WFC Single Disclosure Report 2021

AGC answers

Date submitted
26/10/2021 10:48:21
AGC: 0a Please indicate the full name of the responding institution:
CAJA DE VALORES S.A.
AGC: 0c Registered address:
25 de Mayo 362, Ciudad de Buenos Aires, Argentina
C1002ABH
AGC: 0d Country of registered address:
Argentina
100.4
Rule 17f-7, by reference to Rule 17f-4, requires that, for a CSD to be eligible to hold securities of U.S. registered investment companies (such depositories hereinafter referred to as "Eligible Securities Depositories"), the CSD must be a "system for the central handling of securities where all securities of any particular class or series of any issuer deposited within the system are treated as fungible and may be transferred or pledged by bookkeeping entry without physical delivery of the securities." Are all securities of a particular class or series of any issuer that are deposited in your institution treated
as fungible, and can they be transferred or pledged by bookkeeping entry without physical delivery of the securities?
YesNo
AGC: 1a Please explain

AGC: 2 Rule 17f-7 also requires that an Eligible Securities CSD "acts as or operates a system for the central handling of securities or equivalent book-entries in the country where it is incorporated," or "acts as or operates a transnational system for the central handling of securities or equivalent book-entries." Does your institution:
Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated?
Act as or operate a transnational system for the central handling of securities or equivalent bookentries?
Act in another capacity with respect to the handling of securities or equivalent book-entries?
☐ Not applicable ☐ OTHER:
AGC: 2a. Please explain:
AGC: 2b. Please specify the types of securities for which you act as or operate a system for the central handling of securities or equivalent book-entries:
Equity, Debt, Corporate and Government Bonds, Trust Securities, Treasury Bills, Commercial Papers, ADRs, GDRs, CEDEARs, Mutual Funds, Deferred Payment Checks, Fixed Term Bank Deposits owned by Insurance Companies, Stock Exchange Tradable Promissory Notes.
AGC: 3 What type of legal entity is the institution?
Public Company
Stock Exchange (or part thereof)
Central Bank (or part thereof)
✓ Private Company
OTHER:
AGC: 4
Is the institution operated as a "for profit" or a "not for profit" organization?"
Ear profit
For profit
Not for profit

AGC: 5

Please provide the names of the owners and their ownership interest percentages.

Bolsas y Mercados Argentinos S.A. 99.96 * Bolsa de Comercio de Rosario, Bolsa de Comercio de Mendoza, Bolsa de Comercio de Cordoba, Bolsa de Comercio de Bahia Blanca, Mercado de Argentino de Valores S.A, BCBA, and Bolsa de Comercio de La Plata, 0.04% all together.

AGC: 6a

What is the date of establishment of the CSD?

Please enter the answer in DD/MM/YYYY format.

If you are filling the survey for more than one organization, please enter the name of each organization in different lines and in front of each one the corresponding date.

1974-05-11

AGC: 6b

What is the date that the CSD's operations began?

Please enter the answer in DD/MM/YYYY format.

If you are filling the survey for more than one organization, please enter the name of each organization in different lines and in front of each one the corresponding date.

1974-05-11

AGC: 7

Under what regulation or statute is the CSD established and governed?

As a Central Securities Depository Act 20.643 and Capital Markets Law Act 26.831 as well as a Corporation Act 19.550

AGC: 7a

Is the regulation or statute electronically available?



Yes



No.

AGC: 7b

If regulation or statute is electronically available, please supply web address(es) here or upload document(s).

https://www.cajadevalores.com.ar/Caja/MarcoLegal

AGC: 7c

filecount - Please supply document(s) here:

0

AGC: 7d

What are the roles and responsibilities of the CSD's board of directors (or equivalent), and are they clearly specified? Please provide details of the structure and composition of your Board together with their industry experience and responsibilities in governing the CSD. What are the qualifications to become a board member?

CVSA's Board of directors is currently composed of 6 members. The Board has ample powers. The Chief Internal Audit Officer reports any findings and observations to the Board . There is only limited and statistical information published through CVSA's website. The Board's size is determined by the CSD's Charter and recognised by law. The Board shall be integrated by at least three (3) and at most six (6) regular members who shall be mainly industry participants . Members are appointed by shareholders in the general meeting, for a term of one (1) year, and they may be re-elected indefinitely. The Shareholders' Meeting may also elect one of the Board members to fill the position of Chief Executive Officer (CEO), for a term of one (1) year. The Board's Chairman represents legally the company and it will be liable for chairman's decisions. There are 5 committees dedicated to specific areas: Technology and Information Security, Investments, Application of the Code of Conduct and Ethic, Crisis and Risk Management Committee. According to the Charter, an executive committee could be created which would be in charge of the company's business but it has not been created vet. One of the Directors is designated as the Company's compliance officer, in accordance with the anti-money laundering rules alternates, the Assembly assess the experience, capacity and professional suitability that they possess for the development of its functions, taking as a parameter the good corporate governance practices. The appointed Directors must enjoy the due integrity and reputation, ensure sound and prudent management, in accordance with that established in the laws or in the regulations that issue control authority. The current members have a vast experience in the capital markets and represent important firms of the local market.

AGC: 7e

What are the election procedures?

The Directors and Alternates are elected by the Ordinary Shareholders' Meeting according to the procedure established in the Statute.

AGC: 7f

What is the maximum length of time a board member can serve?

Their term of office is one (1) year and may be re-elected indefinitely.

AGC: 7g

How are the voting powers distributed amongst the board members (i.e. does each board member have one vote or do certain members have additional voting power)?

The Directory will work with the presence of half plus one of its members and adopt its resolutions by majority. In case of a tie, the President will break the tie voting again. No member has additional voting power.

AGC: 7h

What are the procedures established to review the performance of the board as a whole and the performance of the individual board members? Who is responsible for regulating the board members?

The General Meeting of Shareholders is responsible for regulating the board members, according to the provisions of the Bylaws.

On the other hand, CVSA has implemented an annual boar evaluation, in order to improve the corporate govenance. The Board Evaluation policy is to assess and enhance the effectiveness of the Board as a whole. Individual Board members are assessed on their effective contribution and commitment to their role and responsibilities as Directors

AGC: 8

Rule 17f-7 requires that an Eligible Securities Depository regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act, with section 2(a)(50) establishing that z 'foreign financial regulatory authority' means any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded on or subject to the rules of a contract market, board of trade or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate the participation of its members in activities listed above." Who regulates the activities of the CSD?

A governmental body or regulatory organization empowered to administer or enforce laws related to securities matters.
A governmental body or self-regulatory organization empowered to administer or enforce laws related to other financial activities.
A membership organization which regulates the participation of its members in securities matters or other financial activities.
OTHER:

AGC: 8a.

Please explain:

Comision Nacional de Valores (CNV)

AGC: 9

Please provide the name of regulatory authority(ies) identified in question 8:

AGC: 10

Rule 17f-7 requires that an Eligible Securities Depository is subject to periodic examination by regulatory authorities or independent accountants. Is the CSD subject to periodic examination by:

- Independent accountants?
- Regulatory authorities?
- OTHER:

AGC: 10a Please explain:
AGC: 11 Name of Authority #1 (please answer 11a):
Comision Nacional de Valores
AGC: 11a. What enforcement actions are available to regulatory authority #1 for breach of applicable statute or regulatory requirements?
Restrictions on CSD activities.
Termination of CSD activities.
Suspension of CSD activities.
✓ Fines
OTHER: The CNV has broad powers and it may apply any of the above-mentioned remedies.
AGC: 11b. Please explain:
AGC: 11c. What enforcement actions are available to regulatory authority #2 for breach of applicable statute or regulatory requirements?
Fines
Restrictions on CSD activities.
Termination of CSD activities.
Suspension of CSD activities.
OTHER:
AGC: 11d. Please explain:

AGC: 12 Has there been any use of such enforcement actions in the last three years?
Yes
✓ No
OTHER:
AGC: 12a. If yes, please explain:
AGC: 13 Capital. Are annual financial statements publicly disclosed?
YesNo
AGC: 13a. If yes, the AGC requests a copy of the institution's annual report. Is the annual report available electronically?
Yes No
AGC: 13b. filecount - If yes, please upload the document(s) here or insert web link(s) in question 13d:
0
AGC: 13c. filecount - If more than one document for 13b, please upload the additional document here:
0
AGC: 13d. Please insert web link(s) for 13b here:
https://www.cajadevalores.com.ar/InfoFinanciera/EstadosFinancieros
https://www.cnv.gov.ar/SitioWeb/RegistrosPublicos/DetallesRegistrosPublicos/30463?tipoEntidadId=13
AGC: 13e. If no, and annual report and/or financial statements are not disclosed, please state your share capital, reserves, and retained earnings (or equivalents as determined under local accounting standards). Share Capital (then please answer 13f):

AGC: 13g. Retained Earnings:
AGC: 14 Internal Audit. Is an internal audit undertaken in your CSD?
YesNo
AGC: 14a. If yes, what areas does the audit cover (financials, operations, etc.) and which department in your CSD handles it?
The Internal Audit Department handles operational, financial and IT process
AGC: 14b. Please list the date of your last internal audit and the period that the audit covered:
Start date: 01/06/2021 End date: 31/07/2021 Audit date: 30/09/2021
AGC: 14c. How frequently does the internal audit occur?
Two or more times a year Annually
C Less than annually
AGC: 14d. If less than annually, please explain:
AGC: 14e. Are the results of the internal audit publicly available?
○ YesNo

AGC: 14f. Please select the statement that most accurately characterizes the results of the last internal audit:
No material exceptions found.
Minor exceptions found.Material exceptions found.
AGC: 14g. If minor or material exceptions were found, what actions were taken? Please describe:
AGC: 15 Is a financial audit performed by an Audit Firm, Regulatory Authority, or other external party?
YesNo
AGC: 15a. If yes, please state the name(s) of the entity(ies) who perform the financial audit.
Price Waterhouse & Co. S.R.L.
AGC: 15b. Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party:
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party:
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party: 10/08/2021 AGC: 15c.
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party: 10/08/2021 AGC: 15c. Please list the period that the audit covered:
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party: 10/08/2021 AGC: 15c. Please list the period that the audit covered: End date: 30/06/2021 AGC: 15d.
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party: 10/08/2021 AGC: 15c. Please list the period that the audit covered: End date: 30/06/2021 AGC: 15d. How frequently does the financial audit occur?
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party: 10/08/2021 AGC: 15c. Please list the period that the audit covered: End date: 30/06/2021 AGC: 15d. How frequently does the financial audit occur? Start date: 01/01/2021
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party: 10/08/2021 AGC: 15c. Please list the period that the audit covered: End date: 30/06/2021 AGC: 15d. How frequently does the financial audit occur? Start date: 01/01/2021 Two or more times a year

AGC: 15f Are the results of the financial audit publicly available?
O Yes
● No
AGC: 15g. Please select the statement that most accurately characterizes the results of the last financial audit:
No material exceptions found.
Minor exceptions found.
Material exceptions found.
AGC: 15h. If minor or material exceptions were found, what actions were taken? Please describe:
AGC: 16 Is an operational audit performed by an Audit Firm, Regulatory Authority, or other external party?
Yes
O No
AGC: 16a. If yes, please state the name(s) of the entity(ies) who perform the operational audit.
Price Waterhouse & Co. S.R.L.
AGC: 16b. Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party:
17/02/2021
AGC: 16c. Please list the period that the audit covered:
Start date: 01/01/2020 End date: 31/12/2020

AGC: 16d. How frequently does the operational audit occur?
Two or more times a year
Annually
O Less than annually
AGC: 16e. If less than annually, please explain:
AGC: 16f Are the results of the operational audit publicly available?
○ Yes ■ No
AGC: 16g. Please select the statement that most accurately characterizes the results of the last operational audit:
No material exceptions found.
Minor exceptions found.
Material exceptions found.
AGC: 16h. If minor or material exceptions were found, what actions were taken? Please describe:

AGC: 17, 17q PARTICIPANTS AND PARTICIPATION. The purpose of this section is to understand issues relating to participation in the CSD, including eligibility requirements, conditions of participation, and supervision of participants. What types of entities are eligible to become participants and how many of each type are there currently?
✓ Foreign Institutions
Banks
✓ Brokers
Not applicable
Individuals
OTHER: Pension Funds, Mutual Funds, Insurance Companies, Investement Funds, OTC Brokers, Stock Markets, Stock Exchanges, Ministry of Economy, CSDs, ICSDs.
AGC: 17a. How many Bank participants are there currently? (then please answer 17b)
A total of 706 direct participants, of which (407) are stockbrokers, (143) BANK, (24) mutual funds, (14) financial entities and (118) others https://www.cajadevalores.com.ar/InfoFinanciera/CajaEnCifras
AGC: 17b, 17d Please select the features included in the eligibility requirements for Banks.
Financial Thresholds
Regulatory Oversight
Market Experience
OTHER:
AGC: 17c. Where can a description of the specific eligibility requirements for Bank participants be found?
Central Bank of the Republic of Argentina Regulations
AGC: 17d. Please explain:
Central Bank of the Republic of Argentina Regulations
AGC: 17e. How many Broker participants are there currently? (then please answer 17f)
407 BROKERS

AGC: 17f, 17h Please select the features included in the eligibility requirements for Brokers.
Financial Thresholds
Market Experience
Regulatory Oversight
OTHER:
AGC: 17g. Where can a description of the specific eligibility requirements for Broker participants be found?
Comision Nacional de Valores´(CNV) regulations
AGC: 17i. How many Individual participants are there currently? (then please answer 17j)
AGC: 17j. Please select the features included in the eligibility requirements for Individual participants.
Financial Thresholds
Regulatory Oversight
Market Experience
✓ OTHER: N/A
AGC: 17k. Where can a description of the specific eligibility requirements for Individual participants be found?
AGC: 17m. How many Foreign Institution participants are there currently?
6
AGC: 17n, 17p. Please select the features included in the eligibility requirements for Foreign Institution participants.
Regulatory Oversight
Market Experience
Financial Thresholds
OTHER:

AGC: 17o. Where can a description of the specific eligibility requirements for Foreign Institution participants be found?
Comision Nacional de Valores´(CNV) regulations
AGC: 17q. If you have selected "Other entities" above, please explain:
AGC: 17r. Indicate how many "Other entities" are currently participants?
118 others entities
AGC: 17s, 17u Please select the features included in the eligibility requirements for the participants referred to above as "Other entities".
Financial Thresholds
Regulatory Oversight
Market Experience
OTHER:
AGC: 17t. Where can a description of the specific eligibility requirements for participants described above as "Other entities" be found?
Comision Nacional de Valores´(CNV) regulations
AGC: 18 Are participants required to contribute capital to the CSD that would result in ownership of the CSD?
O Yes
No
O Not applicable
AGC: 18a. If yes, what fixed amount is required or what formula is used to determine the appropriate contribution level?

AGC: 19 Are prospective participants subject to an initial review and approval process regarding compliance with eligibility requirements?
YesNoNot applicable
AGC: 20 What governs the relationship between the CSD and the participants?
Established terms and conditions of participation
By-laws of the CSD
✓ Rules of the CSD
Relevant law and regulation
Not applicable
Standard participation contract
✓ OTHER: Circulars and newsletters issued by Caja de Valores S.A
AGC: 20a Please explain:
AGC: 21 Rule 17f-7 requires that an Eligible Securities Depository holds assets for the custodian that participates in the system on behalf of the Fund under safekeeping conditions no less favorable that the conditions that apply to other participants. Please confirm that assets of foreign investors held by custodians as participants in the CSD are held under safekeeping conditions no less favorable than the conditions that apply to other participants.
YesNo
O Not applicable
AGC: 21a. If no, other or not applicable, please explain:

AGC: 21b, 21c. Please confirm the basis for the arrangements you have in place to ensure that the assets you hold for custodians receive the same level of safekeeping protection as the assets held for other categories of participants.
✓ Rules of the CSD
Established terms and conditions of participation
Relevant Law and Regulation
By-laws of the CSD
Standard participation contract
OTHER:
AGC: 21d For each item in Question 21b that you checked, please briefly supply references or citations to the law(s), regulation(s), or CSD rule(s), participation condition(s), or participant contract provision (s), as applicable.
N/A
AGC: 22 How does the CSD notify participants of material changes to the conditions of participation?
By press release
✓ By e-mail
By telephone
By public announcement
Not applicable
✓ OTHER: Circulars and releases distributed through webpage
AGC: 22a. Please explain:
AGC: 23
Who enforces compliance with the CSD's conditions of participation?
✓ The CSD's regulator
Not applicable
The exchange
✓ The CSD
OTHER:

AGC: 23a Please explain:
AGC: 24 What enforcement actions are available to the enforcement authority?
Suspension of participation
Termination of participation
Fines
Restrictions on participation
Not applicable
OTHER:
AGC: 24a Please explain:
AGC: 25 Has there been any such enforcement actions in the last three years?
○ Yes • No
AGC: 25a. If yes, please explain, including information relative to any suspensions of CSD participants:
400.00
AGC: 26 CSD FUNCTIONALITY AND SERVICES, USE OF AGENTS. Certain functionalities and services reduce risk to an investor if provided in an efficient manner. The purpose of this section is to identify those functionalities that may potentially be offered by depositories and clearing systems around the world, and ascertain whether they are offered by your institution. For which of the following security types do you serve as a CSD or clearing system?
Equities
Corporate bonds
Corporate money market
Not applicable
Government securities
OTHER:

AGC: 26a. Please name the other security types:
ADRs, GDRs, CEDEARs, Trust Securities, Mutual Funds, Deferred Payment Checks, Fixed Term Bank Deposits owned by Insurance Companies, Stock Exchange, Tradable Promissory Notes, E-cheq, Electronic Bill
AGC: 27a. (i) Please list the instrument types for which it is not compulsory by law to: (i)settle in your CSD
AGC: 27a. (ii) (ii) safekeep in your CSD:
N/A
AGC: 27b. (i) Please list the instrument types for which it is not compulsory by market practice to: (i)settle in your CSD
N/A
AGC: 27b. (ii) (ii) safekeep in your CSD:
N/A
AGC: 27, 27c Is the use of the CSD in your market compulsory by law or compulsory by market practice for the settlement or safekeeping of all instrument types in your market (e.g. equities, government securities, corporate bonds, money market instruments, warrants, derivatives etc).
Yes by market practice for settlement of all instrument types
Neither
Yes by law for settlement of all instrument types
Yes by law for safekeeping of all instrument types
Yes by market practice for safekeeping of all instrument types
Yes by law for settlement, but not for all instrument types
Yes by law for safekeeping, but not for all instrument type
Yes by market practice for settlement, but not for all instrument types
Yes by market practice for safekeeping, but not for all instrument types
OTHER:

AGC: 28 28a Settlement and Safekeeping Percentages 28a Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) settled within your institution, exclusive of your links with third parties.
N/A
AGC: 28b. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) held in safekeeping within your institution.
N/A
AGC: 29, 29i Are there any activities performed by a third party on behalf of the CSD for the CSD participants (e.g., vaulting of physical securities, registration, entitlement processing, etc.)?
✓ No
Not applicable
Yes
OTHER:
AGC: 29a. If third parties are employed, please indicate which services they supply:
AGC: 29b. If third parties are employed, does the CSD assume liability for losses incurred by participants as a result of the actions/inactions of the third parties?
○ Yes
O No
AGC: 29c, 29e. If you acknowledge responsibility, please indicate whether your responsibility is assumed
if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be gross negligence on the part of the agent
regardless of whether such loss was caused by any action or inaction of the agent
if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be negligence on the part of the agent
if the loss was caused by the willful default or other willful conduct on the part of the agent
□ OTHER·

AGC: 29f. Please specify limit:
AGC: 29g. Please specify limit:
AGC: 29d, 29h. If you acknowledge responsibility for agents, your responsibility is assumed for losses
subject to a monetary limit based on insurance limits
which are not consequential losses
subject to a monetary limit not based on insurance limits
without limit
OTHER:
AGC: 30, 30m
Has any participant suffered any losses in the past three years due to the CSD's performance?
○ Yes
No
O Not applicable
AGC: 30a, 30j If yes, please select all of the following in which loss has occurred. You will be prompted to enter the number of instances and total loss in USD thereafter.
Settlement Process - Securities
Settlement Process - Cash
Corporate Action
System Outage
OTHER:
AGC: 30b. Corporate Action. Please specify number of instances:

AGC: 30c.

Corporate Action. Please specify total loss in USD:

n/a

AGC: 30d.

Settlement Process - Securities. Please specify number of instances:

AGC: 30e.

Settlement Process - Securities. Please specify total loss in USD:

n/a

AGC: 30f.

Settlement Process - Cash. Please specify number of instances:

AGC: 30q.

Settlement Process - Cash. Please specify total loss in USD:

n/a

AGC: 30h.

System Outage. Please specify number of instances:

AGC: 30i.

System Outage. Please specify total loss in USD:

n/a

AGC: 30k.

For Other, please specify number of instances:

n/a

AGC: 30I.

For Other, please specify total loss in USD:

n/a

AGC: 31 Who accepts cash deposits (or makes payment credit accommodations) for CSD transactions?
Neither or others (e.g. credit lines used)
Banks appointed by CSD
✓ Not applicable
Central Bank
CSD
OTHER:
AGC: 31a Please indicate the name of the banks appointed by the CSD
AGC: 32 Who processes cash clearing (or draws on credit lines, if applicable) for CSD transactions?
CSD
Central Bank
Banks appointed by the CSD
Neither or others (e.g. credit lines used)
✓ Not applicable
OTHER:
AGC: 32a Please name banks appointed by the CSD
AGC: 33a Please name banks appointed by the CSD

AGC: 33, 33b Who controls the movement of cash for cash deposits (or draws on credit lines, if applicable)?
✓ Not applicable
Neither or others (e.g. credit lines used)
Banks appointed by CSD
Central Bank
CSD
OTHER:
AGC: 34 Who controls the movement of cash for cash clearing (or for draws on credit lines, if applicable)?
Central Bank
Neither or others (e.g. credit lines used)
V Not applicable
CSD
Banks appointed by CSD
OTHER:
AGC: 34a Please name banks appointed by CSD
AGC: 35 Please indicate services you provide.
Tax assistance where foreign holders may be entitled to tax relief at source or through a claim.
Own list or: AGC: Information in advance on corporate (annual or special) meetings in order that owners can vote.
In order to avoid fails, an automatic securities lending facility - if requested - is provided for.
Collateral handling in support of activities including securities lending, overdraft coverage, cash management,repurchase agreements, etc.
Same day turnaround settlements.
Information on distribution of new issues (IPO, Privatization).
Not applicable
OTHER:

AGC: 35a Automatic securities lending facility is provided for:
Brokers
Other financial institutions
Banks
OTHER:
AGC: 35c Summary narrative for PFMI Principle 5. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)
AGC: 35c If collateral handling, please provide details
AGC: 35d Other, please explain:
Information on corporate actions events in order that beneficial owners can participate.
AGC: 36 What procedures are in place for the processing of corporate action entitlements?
Corporate action entitlements are handled by an entity separate from the CSD.
Credited to the securities account upon actual receipt by the CSD.
Credited to the securities account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
Not applicable
OTHER:
AGC: 36a Credited to the securities account:
On pay date.
On pay date +2.
On pay date +1.
OTHER:

AGC: 36c Name of entity:
AGC: 37a Credited to the cash account:
On pay date.
On pay date +2.
On pay date +1.
OTHER:
AGC: 37c Name of entity:
AGC: 37, 37d. What procedures are in place for the processing of interest and dividends?
Income and dividend collection is handled by an entity separate from the CSD.
Credited to the cash account upon actual receipt by the CSD.
Credited to the cash account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
Not applicable
OTHER:
AGC: 38 Please list all depositories or settlement systems to which you have an electronic link.
Clearstream Banking, Euroclear Bank, DTC and B3. Moreover, Caja de Valores has been appointed as Euroclear Bank's Argentinean Domestic Depository for Debt Securities issued by the Repulbic of Argentina since March 16,2015; and as Clearstream Banking's Argentinean Domestic Depository for all domestic securities since June 18, 2015.
Regarding local settlements systems Caja has electronic links with BYMA, MAE AND MATBA-ROFEX.
AGC: 39 Are procedures and controls (firewalls) in place to avoid systemic collapse or contamination if one of the linked entities should experience business interruptions for whatever reason?
□ No
Not applicable

AGC: 39a Please explain
Yes We have firewalls and virus detectors to prevent contamination or hacker intrusion. Local area network is segmented and internal traffic is controlled. Exposure to outside communications is limited to those workstations that need trafic exchange with other entities.
AGC: 40 Has a business interruption recovery plan been developed in the event the linkages should become inoperable for any reason?
The link are redundant and reach the two datecenters. In the case of the agent network, they uso two different providers.
AGC: 40a. If no or other, please explain
YesNoNot applicableOther
AGC: 41 Are participants permitted to maintain more than one account at the CSD?
YesNoNot applicable
AGC: 41a, 41c If yes, please indicate number:
An unlimited number of accountsMore than one accountOTHER:
AGC: 41b If more than one account what is the maximum?

AGC: 42 Are participants required/permitted to segregate assets held for their own benefit from those they hold for their clients?
✓ Yes
☐ No
Not applicable
OTHER:
AGC: 42a If yes, is segregation required or simply permitted?
Required
O Permitted
AGC: 42b, 42c How does segregation occur?
By separately designated participant accounts.
By separately designated beneficial owner accounts.
By sub-accounts within a single participant account.
OTHER:
AGC: 43, 43b Does the CSD permit its participants to open accounts in the participant's own nominee name(s)?
Yes
○ No
O Not applicable
AGC: 43a If yes, do laws exist, which define as well as protect the rights of beneficial owners with respect to securities registered in nominee name?
Yes
○ No

AGC: 44a In the event a participant's single or main account is blocked for any reason (e.g., insolvency, penalties, violations, liens), would securities held in any account or accounts on behalf of the participant's clients be accessible: By the participant's clients?
Yes No
O Not applicable
AGC: 44b If yes, please describe briefly how clients of participants would access their securities and whether there would be any delay in their ability to do so:
Participant regulatory bodies may, depending on their nature, appoint another Participant to manage accounts and sub accounts. In some exceptional cases, customers could directly resort to the Depository. Caja de Valores S.A. would grant prompt access there to, upon due verification of decisions made by regulatory bodies or competent courts
AGC: 44d. By the intervening authorities controlling insolvency or other proceedings?
YesNoNot applicable
AGC: 44e. If yes, please describe briefly under what conditions access would be granted to the intervening authorities:
It would be granted when, in accordande with their control powers, they administer participants accounts.
AGC: 44h If yes, please describe briefly under what conditions access would be granted to the participant's creditors:
AGC: 44g, 44i By the participant's creditors?
O Yes
No
O Not applicable

AGC: 44j. By the CSD's creditors?
O Yes
No
O Not applicable
AGC: 44k. If yes, please describe briefly under what conditions access would be granted to the CSD's creditors:
AGC: 45 In what form does the CSD maintain records identifying the assets of each participant?
Microfiche
Computer file
Computer tape
Hard copy
✓ OTHER: Magnetic Cartridges, SAN
AGC: 45b In which format is the source data maintained?
Back ups and historic files are held within a SAN and on magnetic cartridges.Participants account statements database is mantained in a Data Protector Library
AGC: 46 Rule 17f-7 requires that an Eligible Securities Depository provides periodic reports to its participants with respect to its safekeeping of assets, including notices of transfers to or from any participant's account. Does the CSD make available periodic safekeeping reports to participants, including notices of transfers to or from the participant's account?
Yes○ No
AOO. 40-
AGC: 46a. If no or other, please explain

AGC: 46b, 46c. If yes, please indicate the scheduled frenquency:
Quarterly
Monthly
Weekly
✓ Daily
Upon request
Annually
OTHER:
AGC: 47, 47a What is your document and record retention policy for documents and records described above in this section?
○ 6 months or less
O 1 year
○ 3 years
○ 5 years
7 years
Other: 10 YEARS
AGC: 48 The Committee on Payment and Settlement Systems of the Bank for International Settlements (BIS) has identified three common structural approaches or models for linking delivery and payment in a securities settlement system. Please indicate which model your procedures most closely resemble.
Not applicable
✓ Model3
✓ Model2
✓ Model1
OTHER:

Please briefly describe your settlement process, including how do your settlement procedures vary from the model chosen above?

AGC: 48a

Model 2 or 3 depending on whether securities transactions are considered to be gross intra-day, or net, to be settled at the end of the day. Cash is net at the end of day in both cases.
Model 1 when settlement of cash and securities is made through CSD links at ICSDs.
AGC: 49 Are the cash and security movements simultaneous?
Yes
○ No
O Not applicable
Other: Yes, when settlement of cash and securities is made through CSD links at ICSDs.
AGC: 49a If cash and security movements are not simultaneous, please indicate the duration of the timing gap
O 1 hour
O 2 hours
O 3 hours
O 4 hours
O 5 hours
Overnight
O 2 days
AGC: 50, 50a How are CSD eligible securities held by the CSD?
✓ In dematerialized form
✓ In certificated form
OTHER:

AGC: 51 If CSD eligible securities are certificated, can CSD eligible securities be held outside of the CSD?
 All eligible securities must be held in the CSD Securities may move freely into and out of the CSD Once entered into the CSD, eligible securities must remain in the CSD Certain designated securities may be held outside the CSD Not applicable
AGC: 51a If certain designated securities are held outside the CSD, please indicate under which conditions these securities would be held outside the CSD:
AGC: 51b If CSD eligible securities are required to be centrally immobilized at the CSD, where and with whom are the certificates safekept? (then please answer 51c)
AGC: 51c Are these certificates:
□ Bearer ✓ Registered □ OTHER:
✓ Registered OTHER: AGC: 51d

AGC: 51h If CSD eligible securities may be held either in or out of the CSD, are these certificates:
O Bearer
Registered
AGC: 51i What are the control features for receipt of certificates to the CSD (e.g., authentication procedures, reregistration)? Please describe:
Validity checking; registrar is consulted regarding the number of holdings, status of securities owners, and notice of changes in sharedownership
AGC: 52 If securities are dematerialized: May dematerialized security positions be re-certificated and held outside the CSD?
O Yes
No
O Not applicable
AGC: 52a, 52k Are the securities held:
✓ Through book-entry at the CSD
Through book-entry at a registrar or issuer
OTHER:
AGC: 52b Please identify which types of entities may act as registrars:
✓ Issuers
Separate companies that perform registrar functions
CSD
OTHER:

AGC: 52d If the securities held by the CSD are recorded by book entry at the registrar, are the securities registered only to the CSD, with the CSD providing the function of recording ownership on a centralized basis for the market?
Yes
O No
AGC: 52e If yes, how are securities held at the registrar for the account of the CSD?
In the name of the CSD
O In the name of a separate nominee of the CSD
AGC: 52f Please describe:
AGC: 52g If the securities held with the CSD are recorded by book-entry at the registrar but are not registered exclusively to the CSD, may they be registered to:
O The beneficial owner
O A nominee
AGC: 52h Please describe:
AGC: 52i If the securities held with the CSD are recorded by book-entry at the registrar, what are the control features at the registrar for transfer of registrar positions to and from the CSD (e.g., authentication procedures, reconciliation, confirmation of position at registrar)? Please describe:
Through book-entry at the depository, Through book-entry at a registrar or issuer

AGC: 53 Does the CSD maintain records that identify the assets of each participant and segregate the system's own assets from the assets of participants?
Not applicable
☐ No
✓ Yes
OTHER:
AGC: 53a If answer to question 'G23Q031' is other or not applicable, please explain
AGC: 54 Does the law protect participant assets from claims and liabilities of the CSD?
Yes
O No
O Not applicable
AGC: 55 Can the CSD assess a lien on participant accounts? (A lien would entitle the CSD to take and hold or sell the securities of the participant in payment of a debt.)
O Yes
No
O Not applicable
AGC: 55a If yes, for what reasons are liens or similar claims imposed?
Collateralization of overdrafts
To accure no mont for numbered accuration
To secure payment for purchased securities
Fees and expenses

AGC: 55c Please indicate the limits of this lien as indicated below:
 The lien is limited to securities in the participant's proprietary account The lien is limited to securities in the course of purchase and sale transactio The lien may extend to settled client positions
AGC: 55d Please explain:
AGC: 55e If a lien is placed on a participant's account which has been designated for its clients, will the CSD select certain securities to be subject to the lien?
○ Yes ○ No
AGC: 55f If yes, please indicate whether:
 The lien is placed on the most liquid securities in the account The lien is placed on the securities with the greatest value in the account
AGC: 55g Please explain:
AGC: 55h If no, please indicate whether the entire account will be subject to the lien.
○ Yes ○ No

AGC: 55j For accounts designated as client accounts, do procedures exist to restrict the placement of liens only to obligations arising from safe custody and administration of those accounts?
○ Yes ○ No
U NO
AGC: 55k If yes, are the restrictions accomplished by:
O Contract between the CSD and the participant
AGC: 55I Please explain:
ACC. FC FC
AGC: 56, 56e Transfer of Legal Ownership. Does the CSD have legal authority to transfer title to securities?
O Yes
○ No
O Not applicable
Other: CVSA have legal authority to transfer title to securities upon request from its participants
HANDLING OF SECURITIES OUTSIDE THE DEPOSITORY ENVIRONMENT The purpose of this section is to consider the process (and any risk inherent within such a process) that involves the safekeeping of client assets while they are being removed from a depository and being lodged into a depository
AGC: 56a When does title or entitlement to CSD securities pass between participants?
At the end of the business day on which the transfer occurs
When corresponding money or other consideration is transferred
When the transaction is processed on an intra-day basis
AGC: 56b Please describe:

AGC: 56c Where does title or entitlement to CSD securities pass between participants?
On the CSD books
On the registrars books
AGC: 56d Please describe:
AGC: 57, 57a How are eligible securities lodged in the CSD system?
A registered certificate in the name of the CSD is delivered to the CSD.
A participant delivers the security with a valid transfer deed or stock power or other transfer document to the CSD which then effects registration.
A registrar re-registers the security in the name of the CSD.
Not applicable
OTHER:
AGC: 58, 58a When are securities lodged into the CSD reflected in a participant's CSD account?
Securities are reflected in the participant's CSD account immediately upon delivery to the CSD.
Not applicable
Securities are re-registered prior to being reflected in the participant CSD account.
OTHER:
AGC: 59a Please specify

AGC: 59, 59b How long does it usually take to lodge securities with the CSD?
1 to 2 days
O 3 days to 1 week
O 2 to 4 weeks
O More than 4 weeks
O Not applicable
AGC: 60 During the process of lodging securities into the CSD, can the securities be traded?
O Yes
No
O Not applicable
AGC: 60a During the process of lodging securities into the CSD, can the securities be settled?
○ Yes
No
O Not applicable
AGC: 60b During the process of lodging securities into the CSD, can the securities have ownership transferred?
○ Yes
No
O Not applicable
AGC: 60c If they cannot be traded, or if you answered other, please explain
AGC: 60d If they cannot be settled, or if you answered other, please explain

AGC: 60e If ownership cannot be transferred, or if you answered other, please explain
AGC: 61a If no: Securities are unavailable for
O 1 to 2 days
O 3 days to 1 week
O 2 to 4 weeks
O More than 4 weeks
O Not applicable
AGC: 61b If more than 4 weeks, please specify
AGC: 61c If not applicable, please explain
AGC: 61, 61d Are securities immediately available for delivery upon transfer to the CSD?
Yes
O No
O Not applicable
AGC: 62 Please describe briefly the arrangements / procedures / facilities you maintain to ensure that eligible securities held at the CSD are handled at least as efficiently as compared to securities held outside the CSD, particularly in relation to income, corporate actions and proxy services.

AGC: 63, 63a What transfer process steps are involved when eligible securities are withdrawn from the CSD for safekeeping?
 Securities are re-registered into the name of the beneficial owner or a nominee. Securities are re-certificated and re-registered into the name of the beneficia Securities are re-certificated and delivered as bearer instruments. Securities are transferred as is any physical delivery in the market. Not applicable
AGC: 64a If more than 4 weeks, please specify
AGC: 64, 64b How long does it usually take to remove securities from the CSD?
 1 to 2 days 3 days to 1 week 2 to 4 weeks More than 4 weeks Not applicable Other: The removal of the securities is made in the batch process or real time, so it takes less than 1 day. For physical securities it takes 24 hours.
AGC: 65a While the securities are being removed from the CSD, can they be traded? (Choose one)
No Not applicable Yes AGC: 65b
If they cannot be traded please explain

AGC: 65c While the securities are being removed from the CSD, can they be settled? (Choose one)
No
O Not applicable
O Yes
AGC: 65d If they cannot be settled, please explain
AGC: 65e While the securities are being removed from the CSD, can they have ownership transferred? (Choose one)
No
O Not applicable
O Yes
AGC: 65f If ownership cannot be transferred, please explain
AGC: 66, 66a, 66d Does the CSD accept liability (independent of any insurance coverage) for the following: Reconciliation
errors with the registrar and/or the issuer that result in direct damages or losses to participants?
○ No
○ No O Not applicable
Not applicable Yes
O Not applicable
Not applicable Yes AGC: 66b 66c
 Not applicable Yes AGC: 66b 66c If yes, please check all of the following that apply:
 Not applicable Yes AGC: 66b 66c If yes, please check all of the following that apply: Financial limits are imposed on the amount of liability assumed by the CSD

AGC: 66e, 66g, 66h Theft of securities (either physical certificate or electronically from accounts at the CSD) from the CSD that results in direct damages or losses to participants?
○ No
Yes
O Not applicable
AGC: 66f If yes, please check all of the following that apply:
Financial limits are imposed on the amount of liability assumed by the CSD
The CSD assumes liability for direct losses
The CSD assumes liability for indirect or consequential losses
OTHER:
AGC: 66i, 66i. Failure of the CSD's systems that result in direct damages or losses to participants because they cannot use either securities or funds?
○ No
Yes
O Not applicable
AGC: 66j, 66k If yes, please check all of the following that apply:
The CSD assumes liability for direct losses
Financial limits are imposed on the amount of liability assumed by the CSD
The CSD assumes liability for indirect or consequential losses
OTHER:

AGC: 66m, 66p. Any direct damages or losses to participants caused by the CSD due to its errors, omissions or fraud?
✓ Yes
☐ No
Not applicable
OTHER:
AGC: 66n. If yes, please check all of the following that apply:
Financial limits are imposed on the amount of liability assumed by the CSD
The CSD assumes liability for direct losses
The CSD assumes liability for indirect or consequential losses
OTHER:
AGC: 66q. Does the CSD accept liability (independent of any insurance coverage) for the following: Any direct damages or losses to participants caused by the CSD in its capacity as a central counterparty?
○ Yes
○ No
Not applicable
AGC: 66r. If yes, please check all of the following that apply:
The CSD assumes liability for direct losses
Financial limits are imposed on the amount of liability assumed by the CSD
The CSD assumes liability for indirect or consequential losses
OTHER:

AGC: 66u. Does the CSD guaranty	settlement?
No Yes	
O Not applicable	
AGC: 66v. Please explain how this to guaranty settlement?	is accomplished. What are the procedures and safeguards that permit the CSD
AGC: 66x. Any direct damages or lacts of God, or political	osses to participants caused by the CSD as a result of force majeure events, events, etc.?
O Yes	
No	
O Not applicable	
AGC: 66y. If yes, please check all	of the following that apply:
If yes, please check all	of the following that apply: liability for indirect or consequential losses
If yes, please check all	
The CSD assumes The CSD assumes	liability for indirect or consequential losses
The CSD assumes The CSD assumes	liability for indirect or consequential losses liability for direct losses
If yes, please check all the CSD assumes The CSD assumes Financial limits are in OTHER:	liability for indirect or consequential losses liability for direct losses
If yes, please check all of the CSD assumes The CSD assumes The CSD assumes Financial limits are i OTHER: AGC: 66+ In all cases where the C	liability for indirect or consequential losses liability for direct losses
If yes, please check all of the CSD assumes The CSD assumes The CSD assumes Financial limits are i OTHER: AGC: 66+ In all cases where the C	liability for indirect or consequential losses liability for direct losses mposed on the amount of liability assumed by the CSD CSD assumes responsibility for direct or indirect or consequential losses, is the
The CSD assumes The CSD assumes Financial limits are i OTHER: AGC: 66+ In all cases where the CCSD's liability limited by	liability for indirect or consequential losses liability for direct losses mposed on the amount of liability assumed by the CSD CSD assumes responsibility for direct or indirect or consequential losses, is the
The CSD assumes The CSD assumes The CSD assumes Financial limits are i OTHER: AGC: 66+ In all cases where the CCSD's liability limited by Yes	liability for indirect or consequential losses liability for direct losses mposed on the amount of liability assumed by the CSD CSD assumes responsibility for direct or indirect or consequential losses, is the

AGC: 67a, 67b. Do the CSD's written contracts, rules, or established practices and procedures provide protection against risk of loss of participant assets by the CSD in the form of indemnification?
Not applicable
Yes
□ No
OTHER:
AGC: 67b. Please explain (then please answer 67c):
If applicable, Caja de Valores delivers to the participants the same quality and type of lost securities.
AGC: 67c. Please provide details of the relevant sections of the contracts, rules or practices where this information is found
Act 20,643
AGC: 67d. Insurance
Yes
✓ No
Not applicable
OTHER:
AGC: 67e. Please explain (then please answer 67f):
AGC: 67f. Please provide details of the relevant sections of the contracts, rules or practices where this information is found
AGC: 67g.
Acknowledgement of liability for losses caused by CSD's own actions.
Yes
○ No
O Not applicable

AGC: 67h. Please explain (then please answer 67i):
If applicable, Caja de Valores delivers to the participants the same quality and type of lost securities.
AGC: 67i. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.
AGC: 67j. Other
○ Yes ○ No
AGC: 67k. Please explain (then please answer 67l:
AGC: 67I. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.
AGC: 68 Is the CSD immune from legal action in its own jurisdiction?
YesNo
AGC: 69 Security Control. How do participants receive information (view actual settlement of trades, movement of securities on their accounts, etc.) and see the status of their accounts?
 Not applicable By receipt of physical account holding statements By direct electronic link OTHER: By access to electronic account holding statements in a special website
AGC: 69a. Please explain:

AGC: 70 Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?
YesNo
O Not applicable
AGC: 70a. How is access given to participants?
By direct electronic link
OTHER: By means of written instructions
AGC: 70b. Please select type of electronic link:
Secured, leased, dedicated telephone line
Dial-up modem
✓ Internet
☐ Fax
AGC: 70c. Please explain:
AGC: 71 71a. Regarding data security: Are passwords used by participants to access their accounts?
Yes
○ No
O Not applicable

AGC: 71c. Does each user have a unique user ID?
Yes
○ No
O Not applicable
AGC: 71e. Are passwords regularly changed?
Yes
○ No
O Not applicable
AGC: 71f. How often?
Every thirty (30) days.
AGC: 71h. Is there a user lock-out after a pre-set number of unsuccessful User ID attempts?
Yes
○ No
O Not applicable
AGC: 71i. How many?
4
AGC: 72 Does the CSD communicate with other market entities such as stock exchanges, payment systems, clearing houses, etc., by secured linkages?
Yes
○ No
O Not applicable

AGC: 72a Please explain:
Central Bank Electronic Payment System (MEP); DTC(Settlement Web & SWIFT); Euroclear BANK(SWIFT & Easyway); Clearstream BANKING LUX.(SWIFT & Creation Online); B3 (SWIFT).
AGC: 73 73a How does the CSD communicate with Stock Exchanges?
Dial-up modem
other
✓ Paper
✓ Fax
Not applicable
Secured, leased, dedicated telephone line
✓ Internet
OTHER:
AGC: 73b How does the CSD communicate with Payment Systems?
Dial-up modem
Secured, leased, dedicated telephone line
✓ Internet
Fax
Paper
other
Not applicable
OTHER:

AGC: 73c How does the CSD communicate with Clearing Houses?
Dial-up modem
Secured, leased, dedicated telephone line
✓ Internet
✓ Fax
✓ Paper
other
Not applicable
OTHER:
AGC: 73d How does the CSD communicate with Registrars?
Dial-up modem
Secured, leased, dedicated telephone line
✓ Internet
Fax
Paper
other
Not applicable
OTHER: BYMA DIGITAL
AGC: 74 How is access to the physical building controlled?
✓ By guards
✓ By alarm system
personal ID card
✓ By electronic keys
OTHER: Videocameras, fingertips
AGC: 74a. Please explain:

AGC: 75 What are the vault security procedures for the safekeeping of physical paper?
Fire alarms
✓ Intrusion alarms
✓ Vault counts
✓ Visitor logs
✓ Dual access control
✓ Electronic keys or combinations
Not applicable, no vault is maintained
✓ Guards
✓ OTHER: Videocameras
AGC: 75a. Please indicate frequency of vault counts:
At least once a month.
AGC: 75b Please explain:
AGC: 76, 76d
Participant Default Protections Resulting from a Participant Failure. If a participant defaults, how is the loss covered? (Choose all that apply?)
CSD insurance covers the loss
The CSD guaranty fund covers the loss
Loss is shared among participants
✓ Not applicable
OTHER:
AGC: 76a Please explain the process:

AGC: 76b Please explain the process of how the loss is shared:
C Equally, among participants
Pro-rata based on participant's volume
C Limited to participants with transactions with failing counterparty
AGC: 76d Please explain:
AGC: 77 During the past three years, has there been a situation where a participant defaulted which resulted in a significant loss?
○ Yes
No
O Not applicable
AGC: 77a How was the situation resolved? Or if you answered "Other," then please explain:
AGC: 78 Does the CSD have a guaranty fund independent of stock exchange or other market guarantees?
○ Yes
No
O Not applicable
AGC: 78a. If yes, please respond to the following questions: What is the size of the fund?

AGC: 78b. How is the size of the fund determined?
By participant volume By asset value
A fixed amount
AGC: 78d. How is the fund financed?
Contributions from owner
O Contributions from participants
Funding from retained earnings
AGC: 78e. If so, what is the amount or percentage per owner?
AGC: 78f. If so, what is the amount or percentage per participant?
AGC: 78h. Who is covered by the fund?
Direct CSD participants only
The beneficial owner also
OTHER:
AGC: 78j. When is the guaranty fund used?
When a broker defaults
When a direct participant defaults
OTHER:

AGC: 79 Does the CSD have forms of oversight management for assessing and monitoring of the following?
Collateral requirements for participants
Blocking of securities movement before receipt of payment
Other loss or default protections the CSD maintains
Settlement controls that minimize or eliminate the risk of default by a participant
Participant financial strength
Blocking payment until securities are moved
Not applicable
Debit caps for participants
✓ Participant volumes
Participant eligibility requirements
OTHER: Electronic transfers system controls.
AGC: 79a Please explain other loss or default protections:
AGC: 79a Please explain other loss or default protections:
AGC: 79b Please explain the requirements:
AGC: 79c Please explain how these debit caps work:
AGC: 79d. What type or types of settlement controls
Blocking or freezing of securities positions
Controlling DVP settlement
Simultaneous DVP
OTHER:
AGC: 79e. Please explain:

AGC: 79f. Please explain:
AGC: 79g. Please explain:
AGC: 79h Please identify and explain:
AGC: 79i Please explain briefly how these work:
AGC: 80 Does the stock exchange have default protections that extend to the CSD, such as the following?
Margin requirements for stock exchange members
Guaranty fund for stock exchange members
Financial requirements for stock exchange membership
✓ No
Not applicable
OTHER:
AGC: 80a Please explain:
AGC: 81
BUSINESS RECOVERY PLAN. This section is intended to identify key aspects of the CSD's Business Recovery Plan (BRP), including testing requirements and past results, expected recovery time periods, and the independent review and validation (if any) of the BRP. Do you have a formal business recovery plan?
Yes
○ No
AGC: 81b.
Please identify both the frequency and the last date of testing for the following third party: CSD participants/members

AGC: 81c. Please identify both the frequency and the last date of testing for the following third party: Stock exchange
Yearly
AGC: 81d. Please identify both the frequency and the last date of testing for the following third party: Central bank
Yearly
AGC: 81e. Please identify both the frequency and the last date of testing for the following third party: Local brokers
Yearly
AGC: 81f. Please identify both the frequency and the last date of testing for the following third party: Any other third party
Yearly
AGC: 81a, 81h. Does your Business Recovery Plan include:
Back-up of all computer files
Back-up files stored and locked
✓ Off-site operations facility
✓ Off-site data storage
OTHER: We have IT Disaster Recovery Plan and BCP.
AGC: 82 How quickly can the main system be reactivated in the event of an outage?
1 - 4 hours
0 4 - 8 hours
0 8 - 24 hours
C Longer than 24 hours
O Not applicable

AGC: 83 If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing?
1 - 4 hours
O 4 - 8 hours
O 8 - 24 hours
O Longer than 24 hours
O Not applicable
AGC: 84 Will the CSD publicly announce any system interruption?
○ Yes
○ No
O Not applicable
Other: Depending on the magnitude of the event and the number of participants impacted with the
interruption, the communication would be to the direct participants by e-mail or telephone and / or the regulator via the web, following a mechanism specially established to inform Relevant Events
AGC: 84a. To whom will the CSD disclose any system interruptions?
To all direct participants
To the CSD regulators
To direct and indirect participants
To the public via the internet
In the press
OTHER:
AGC: 84b. If so, please list webpage address:
AGC: 84c. If so, please list all publications:

AGC: 84d. Please explain:
AGC: 84e. How will the CSD disclose any system interruptions?
Public announcement
✓ By e-mail
✓ By telephone
Press release
OTHER:
AGC: 84f. Please explain:
Depending on the magnitude of the event and the number of participants impacted with the interruption, the communication would be to the direct participants by e-mail or telephone and / or the regulator via the web, following a mechanism specially established to inform Relevant Events.
AGC: 85 In the past three years, has it been necessary to activate the recovery plan in a live situation?
○ Yes
No
O Not applicable
AGC: 85a. If yes, how much time was needed to implement the recovery plan?
C Less than 1 hour
O 1 - 2 hours
O 2 - 4 hours
C Longer than 4 hours

AGC: 85b. How much time was needed to recover and restore business to normal operations?
O 1 - 4 hours
O 4 - 8 hours
O 8 - 24 hours
O Longer than 24 hours
AGC: 85c, 85d. What was the impact to the market?
As a result of the system failure, all fines and penalties for late settlements were waived
All cash settlements took place more than one business day late
All securities settlements took place more than one business day late
All cash settlements took place one business day late with value one day late
All securities settlements took place one business day late with value one day late
All cash settlements took place one business day late with good value
All securities settlements took place one business day late with good value
Even though there was a system failure, all fines and penalties for late settlements were still assessed
All cash settlements took place as scheduled on the same day with good value
All securities settlements took place as scheduled on the same day with good value
✓ OTHER: N/A
AGC: 86 Has there been any material loss by the CSD during the past three years?
○ Yes
No
O Not applicable
AGC: 86a. If there has been a loss, please describe the cause, the final impact and the action taken to prevent a recurrence:

AGC: 87 Has the CSD been subject to any litigation involving a participant during the past three years?
O Yes
No
O Not applicable
AGC: 87a. Please explain the circumstances and resolution:
AGC: 88, 88a Has the CSD realized revenues sufficient to cover expenses during the past three years?
Yes for all three years
O Yes for two of the last three years
O Yes for one of the last three years
O None of the last three years
O Not applicable
AGC: 89, 89b Does the CSD maintain a reserve for operating losses?
Yes
○ No
O Not applicable
AGC: 89a. Please describe and indicate reserve (for operating losses) amount:
- Legal reserve: ARS 219.852.802
- Reserve for possible risks: ARS 249.410.041 Special reserve: ARS 4.420.031.713

AGC: 90 Has the regulatory body with oversight responsibility for the CSD issued public notice that the CSD is not in current compliance with any capital, solvency, insurance or similar financial strength requirements imposed by such regulatory body?
○ Yes
No
O Not applicable
AGC: 90a. Please describe:
AGC: 90b.
In the case of such a notice having been issued, has such notice been withdrawn, or, has the remedy of such noncompliance been publicly announced by the CSD?
○ Yes
○ No
AGC: 90c. If yes, please describe:
AGC: 90d. If no, why not?
AGC: 91
Does the CSD have insurance to cover losses in the event of Default on settlement commitments by the CSD or a participant?
O Yes
○ No
Not applicable
AGC: 91a What is the amount of the coverage?
AGC: 91b What is the amount of the deductible?

AGC: 92 Does the CSD have Fidelity insurance (that is, insurance to cover loss of securities or money resulting, for example, from acts such as forgery, theft, fraud and/or employee dishonesty)?
● Yes ○ No
O Not applicable
AGC: 92a. What is the amount of the coverage?
USD 30MM
AGC: 92b. What is the amount of the deductible?
Deducible: u\$s 1.000.000
AGC: 93 Does the CSD have insurance for Operational Errors?
YesNo
O Not applicable
AGC: 93a. What is the amount of the coverage?
USD 10 MM
AGC: 93b. What is the amount of the deductible?
Deductible: USD 25,000
AGC: 94 Does the CSD have Errors and Omissions insurance?
Yes
○ No
O Not applicable

AGC: 94a. What is the amount of the coverage?
USD 10MM
AGC: 94b. What is the amount of the deductible?
Deductible by event
D&O responsability: without deductible.
Indemnization recover: without deductible.
Capital Market claim:u\$s 10.000
AGC: 95 Does the CSD have insurance for the Premises?
Yes
○ No
O Not applicable
AGC: 95a. What is the amount of the coverage?
USD 38.24 MM
AGC: 95b. What is the amount of the deductible?
Deductible: USD 1.500
AGC: 96a. If so, what is it for?
CIVIL LIABILITY
AGC: 96b. What is the amount of the coverage?
USD 2.000.000
AGC: 96c. What is the amount of the deductible?
Deductible USD 1250

AGC: 96, 96d Does the CSD have any other insurance?
Yes
○ No
O Not applicable
AGC: 97 Who is the insurance carrier? If more than one insurance carrier, please list each carrier here and provide your responses to questions 97a and 97b in corresponding order.
Zurich Argentina Insurance Company
AGC: 97a. Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)
n/a
AGC: 97b. What is the term of the policy?
1 year. 05/10/2021 to 05/10/2022
AGC: 97c, 97d Who does the insurance cover?
✓ CSD
Direct CSD participants
Final investors
Not applicable
OTHER: The insured is covered as owner and / or policyholder and / or responsible and / or depositary and / or tenant and / or holder for any reason and / or existing subsidiary and / or associated and / or controlled companies or that may be formed, acquired or be constituted
AGC: 98
If you feel that you would like to provide additional details on any of the given answers, feel free to provide any additional comments here (maximum of 5,000 characters) or prepare an additional document identifying the question(s) you are commenting on and upload the document under 98a:
ACC: 09a
AGC: 98a. filecount - Upload document here:

AGC: 99 The WFC, the AGC, CPMI and IOSCO encourage respondents to make their disclosure reports publicly available. Do you agree to make your response publicly available?
Yes, my full response will be publicly available. I agree that my response can be published on the
website of the WFC and on the website of the regional CSD association(s) which my CSD is a member of.
Yes, my response will be public, but only for my answers to AGC questions.
Yes, my response will be public, but only for my answers to PFMI questions.
O No, I do not wish my response to be publicly available.
AGC: 99a How will you be making your answers publicly available?
✓ Website
Upon request
OTHER:
AGC: 99b This disclosure can also be found at the following web address(es):
https://www.cajadevalores.com.ar/Caja/MarcoInternacional
AGC: 99c First and Last Name of the contact person:
MARTIN PALADINO
AGC: 99d How do you prefer to be contacted?
✓ e-mail
AGC: 99e Telephone number (please include the international country code):
mail/air courier
Fax
Telephone +54 11 4317 8952

AGC: 99f Fax number
N/A
AGC: 99g What is the preferred street address for mailing requests?
25 de Mayo 362 C1002ABH Buenos Aires
AGC: 99h Email address of the contact person:
MARTIN.PALADINO@CAJADEVALORES.COM.AR
AGC: 100 AGC members from time to time receive requests from their direct investor-clients for an informational copy of a CSD's completed questionnaire. Such requests typically lead to interactions between personnel at the CSD in question and member personnel or client personnel, or both. Those interactions take time and impose costs on both members and depositories. Do you approve of AGC members delivering a copy of your completed questionnaire to the member's direct client in response to the client's request?
○ YesNo
AGC: 101 Does your organization have a documented cyber security policy in place?
YesNo
This document is confidential and for internal use only.
This desament is confidential and for internal use only.
AGC: 102 Please confirm that your staff receive relevant training about this policy.

AGC: 103 Please provide an overview of your policy for continuity of business in the event of a large data breach or cyber attack against your organization.
Yes
○ No
We have documents referring to the Management of critical incidents and cyber security, in which it is mentioned that the affected business area participates in the decision of the mitigation and communication plan. Besides, there is a predefined Critical Incident Response Team or Cyberattack Team, with the following members:
- IT and information security specialists
- Public relations and communication of the organization
- Legal Department
- HR
- Business area and operations managers.
AGC: 104
In the last 12 months have there been any changes to the policy?
O Yes
No
AGC: 105
Please advise how often you review the policy.
Annually
O Semi-annually
Other
AGC: 106 filecount - Please provide (as an attachment) a diagram showing where your cyber security function resides and who it reports to.
0
AGC: 107

How does your organization identify which business functions carry a cyber risk

Our organization has developed an Information Security Matrix, aimed to identify information assets that are critical according to the CIA triad. Those business functions that are responsible for one or more critical information assets are classified as risk functions.

AGC: 108 Do you conduct ongoing testing and monitoring processes to ensure that all internal and external connectivity and system configurations are not at risk of cybersecurity breaches?
Yes
○ No
AGC: 109 What technological controls and protections are in place for your systems and networks?
Security HW includes: irewalls, IPS/IDS, VPN Controllers /Antivirus-Malware corporate protection.
AGC: 110 Does your organization use multi-factor authentication
• Yes
○ No
AGC: 111 Where your organization has outsourced activities or functions to a third-party provider, is your cyber risk exposure documented?
○ Yes
No
AGC: 112 What measures does your organization have to ensure early detection of a cyber attack?
SOC 7x24
AGC: 113 What is the agreed resumption time for critical operations following a cyber attack?
The agreed resumption time, in case of total loss scenario of main DPC as a result os a cyber attack, is 3 hours.
AGC: 114 How would you advise clients of a successful cyber attack against your organization?
An internal protocol (ecosistema) has been established to identify the need of any external communication required to notify customers and vendors about cyber-attacks and/or outages affecting critical services

AGC: 115 In the last 12 months has your organization been subject to a cyber attack that impacted the service you provide to us? If yes, please provide details.
○ Yes
● No
AGC: 116 Are the following elements of your cybersecurity framework tested pre and post deployment of changes?
Vulnerability assessment
Scenario based penetration tests
Testing of incident response process and technical/business/operations (e.g. table-top exercise)
OTHER: There is a formal procedure to manage and repair vulnerabilities identified as a result of pentest. there is a security baseline that must be applied in application systems development. There is a Pentest annual plan to scan critical application systems. External penetration testing is conducted be Neosecure and Base 4. Incident management framework is being aligned to NIST Framework. The playbooks to respond in case of cyber incidents are under development.
AGC: 117
For cloud technology and associated cyber security risks, do you you have procedures and controls in place to protect our information from mishandling or theft?
In the comments section could you please explain how these procedures and controls tie back to your record retention policy?
○ Yes
○ No
AGC: 118 Does your organization conduct dark web searches for signs of a breach (internet protocol or customer/client personally identified information for sale)?
AGC: 119
Is your organization aware of SWIFT's Customer Security Program (CSP)?
○ Yes
No
Yes
O No

AGC: 120 Does your organization ensure compliance with SWIFT's CSP controls?
YesNo
AGC: 121 Does your organization respond to requests for your institution's attestations?
○ Yes
No
AGC: 122 Does your organization request the attestation details of your counterparties and incorporate the responses into ongoing relationship and risk management programs?
○ Yes
No