

## WFC Single Disclosure Report 2025

## AGC answers

Date submitted

29/10/2025 16:07:18

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

AGC: 1

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 depositaries 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?

 Yes No

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? Not applicable Act in another capacity with respect to the handling of securities or equivalent book-entries? Act as or operate a transnational system for the central handling of securities or equivalent book-entries? 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?

- Private Company
- Public Company
- Central Bank (or part thereof)
- Stock Exchange (or part thereof)
- OTHER:

AGC: 4

Is the institution operated as a "for profit" or a "not for profit" organization?"

- 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 and \*Bolsa de Comercio de Bahia Blanca 0.005% each one; \*Bolsa de Comercio de Buenos Aires 0.002% and \*Mercado Argentino de Valores 0.010%.

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.

11/05/1974

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.

11/05/1974

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://cajadevalores.com.ar/Institucional/5>

AGC: 7c  
filecount - Please supply document(s) here:

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. The Board shall be integrated by at least three (3) and at most nine (9) 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 yet. 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.

In order to improve the corporate governance, CVSA has implemented an annual board evaluation. Through this evaluation, all members must evaluate the contribution and commitment of the roles 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 '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 membership organization which regulates the participation of its members in securities matters or other financial activities.
- A governmental body or self-regulatory organization empowered to administer or enforce laws related to other financial activities.
- A governmental body or regulatory organization empowered to administer or enforce laws related to securities matters.
- 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?

- Termination of CSD activities.
- Suspension of CSD activities.
- Restrictions on 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?

- Termination of CSD activities.
- Suspension of CSD activities.
- Restrictions on CSD activities.
- Fines
- OTHER:

AGC: 11d.

Please explain:

External Auditor (PWC) will elevate any issues to the board. In addition, they sign an annual evaluation (RG 704) that confirms the compliance with control, operating and technical minimum requirements

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?

- Yes
- No

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:

AGC: 13c.

filecount - If more than one document for 13b, please upload the additional document here:

AGC: 13d.  
Please insert web link(s) for 13b here:

[Caja de Valores](#)  
[EEFF CVSA 31.12.2024 legalizado.pdf](#)

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: 13f.  
Reserves (then please answer 13g):

AGC: 13g.  
Retained Earnings:

AGC: 14  
Internal Audit. Is an internal audit undertaken in your CSD?

Yes  
 No

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:

End date: 30/09/2025  
Start date: 01/01/2025  
Audit date: 17/10/2025

AGC: 14c.  
How frequently does the internal audit occur?

Two or more times a year  
 Annually  
 Less than annually

AGC: 14d.  
If less than annually, please explain:

AGC: 14e.  
Are the results of the internal audit publicly available?

Yes  
 No

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?

Yes  
 No

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:

07/08/2025

AGC: 15c.  
Please list the period that the audit covered:

Start date: 01/01/2025  
End date: 30/06/2025

AGC: 15d.  
How frequently does the financial audit occur?

Two or more times a year  
 Annually  
 Less than annually

AGC: 15e.  
If less than annually, please explain:

AGC: 15f  
Are the results of the financial audit publicly available?

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  
 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:

06/03/2025

AGC: 16c.  
Please list the period that the audit covered:

Start date: 01/01/2024  
End date: 31/12/2024

AGC: 16d.  
How frequently does the operational audit occur?

Two or more times a year  
 Annually  
 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, 17g  
**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?

Brokers  
 Not applicable  
 Banks  
 Foreign Institutions  
 Individuals  
 OTHER: Pension Funds, Mutual Funds, Insurance Companies, Investment 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 595 direct participants, of which (320) are stockbrokers, (158) BANK, (24) mutual funds, (43) financial entities and (37) others. Foreign Institution 13.

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)

320 BROKERS

AGC: 17f, 17h  
Please select the features included in the eligibility requirements for Brokers.

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- 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?

13

AGC: 17n, 17p.  
Please select the features included in the eligibility requirements for Foreign Institution participants.

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- 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?

37 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?

- Yes
- No
- 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?

- Yes
- No
- Not applicable

AGC: 20

What governs the relationship between the CSD and the participants?

- Relevant law and regulation
- Standard participation contract
- Established terms and conditions of participation
- Rules of the CSD
- Not applicable
- By-laws of the CSD
- OTHER: Circulars and newsletters issued by Caja de Valores S.A

AGC: 20b

Provide a link to the rulebook.

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 than 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.

- Yes
- No
- 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.

- Relevant Law and Regulation
- Standard participation contract
- By-laws of the CSD
- Rules of the CSD
- Established terms and conditions of participation
- 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 public announcement
- By e-mail
- By telephone
- 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
- Not applicable
- The CSD's regulator
- The exchange
- OTHER:

AGC: 23a

Please explain:

AGC: 24

What enforcement actions are available to the enforcement authority?

- Not applicable
- Restrictions on participation
- Suspension of participation
- Termination of participation
- Fines
- 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:

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?

- Corporate money market
- Not applicable
- Government securities
- Corporate bonds
- Equities
- OTHER: 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: 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 (part 1), 27c

For all instrument types eligible for settlement in your depository, please confirm if settlement is compulsory by law or compulsory by market practice, or both? (Choose all that apply.)

- Yes by law for all instrument types (please answer 27a)
- Yes by law and by market practice, for all instrument types (please answer 27b)
- Yes by market practice for all instrument types (please answer 27b)
- OTHER:

AGC: 27 (part 2), 27c

For all instrument types eligible for safekeeping in your depository, please confirm if safekeeping is compulsory by law or compulsory by market practice, or both? (Choose all that apply.)

- Yes by law for all instrument types (please answer 27a)
- Yes by market practice for all instrument types (please answer 27b)
- Yes by law and by market practice, for all instrument types (please answer 27b)
- 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.

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.

AGC: 29, 29i

Are there any settlement/operational activities performed by a third party on behalf of the depository for the depository participants?

- Yes (please answer 29a)
- No

AGC: 29, 29i

Select all applicable

- Entitlement processing
- Vaulting of physical securities
- Registration
- 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
- 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

- without limit
- which are not consequential losses
- subject to a monetary limit not based on insurance limits
- subject to a monetary limit based on insurance limits
- OTHER:

AGC: 30, 30m

Has any participant suffered any losses in the past three years due to the CSD's performance?

- Yes
- No
- 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.

- System Outage
- Settlement Process - Cash
- Settlement Process - Securities
- Corporate Action
- 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: 30g.  
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: 30l.  
For Other, please specify total loss in USD:

n/a

AGC: 31, 31b  
Who accepts cash deposits (or makes payment credit accommodations) for CSD transactions?

- Neither or others (e.g. credit lines used)
- Banks appointed by CSD
- Central Bank
- CSD
- Not applicable
- 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?

- Not applicable
- CSD
- Central Bank
- Banks appointed by the CSD
- Neither or others (e.g. credit lines used)
- OTHER:

AGC: 32a

Please name banks appointed by the CSD

AGC: 33, 33b

Who manages the movement of cash for cash deposits (or draws on credit lines, if applicable)? (Choose all that apply.)

- Central Bank
- Neither or others (e.g. credit lines used)
- CSD
- Banks appointed by CSD
- Not applicable

AGC: 34, 34b

Who manages the movement of cash for cash clearing (or for draws on credit lines, if applicable)? (Choose all that apply.)

- Not applicable
- Neither or others (e.g. credit lines used)
- Banks appointed by CSD
- Central Bank
- CSD
- OTHER:

AGC: 34a

Please name banks appointed by CSD

AGC: 35

Please indicate services you provide.

- Own list or: AGC: Information in advance on corporate (annual or special) meetings in order that owners can vote.
- Tax assistance where foreign holders may be entitled to tax relief at source or through a claim.
- Not applicable
- Information on distribution of new issues (IPO, Privatization).
- Same day turnaround settlements.
- Collateral handling in support of activities including securities lending, overdraft coverage, cash management, repurchase agreements, etc.
- In order to avoid fails, an automatic securities lending facility - if requested - is provided for.
- OTHER:

AGC: 35a  
Automatic securities lending facility is provided for:

- Banks
- Brokers
- Other financial institutions
- 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?

- Credited to the securities account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
- Credited to the securities account upon actual receipt by the CSD.
- Corporate action entitlements are handled by an entity separate from the CSD.
- Not applicable
- OTHER:

AGC: 36a  
Credited to the securities account:

- On pay date +2.
- On pay date +1.
- On pay date.
- OTHER:

AGC: 36c  
Name of entity:

AGC: 37a  
Credited to the cash account:

- On pay date.
- On pay date +1.
- On pay date +2.
- OTHER:

AGC: 37c  
Name of entity:

AGC: 37, 37d.  
What procedures are in place for the processing of interest and dividends?

- 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.
- Income and dividend collection is handled by an entity separate from the CSD.
- Not applicable
- OTHER:

AGC: 38  
Please list all depositories or settlement systems to which you have an electronic link (note: this excludes institutions where you only hold accounts without further system linkage).

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 Republic 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, A3 and MAV.

AGC: 39  
Are procedures and controls in place to avoid systemic collapse or contamination if one of the depositories and settlement systems should experience business interruptions for whatever reason?

- No
- Yes
- Not applicable

AGC: 39a  
Please explain

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 traffic 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?

- Yes
- No
- Not applicable
- Other

The links are redundant and reach the two datacenters. In the case of the agent network, they use two different providers.

AGC: 40a.  
If no or other, please explain

AGC: 41

Are participants permitted to maintain more than one account at the CSD?

 Yes No Not applicable

AGC: 41a, 41c

If yes, please indicate number:

 More than one account An unlimited number of accounts OTHER:

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?

 Not applicable No Yes OTHER:

AGC: 42a

If yes, is segregation required or simply permitted?

 Required Permitted

AGC: 42b, 42c

How does segregation occur?

 Segregated (By separately designated beneficial owner accounts.) Omnibus with sub account (By sub-accounts within a single participant account.) Omnibus (By separately designated participant accounts.) OTHER:

AGC: 43, 43b

Is the nominee account concept being recognised in your market?

 Yes No Not applicable

AGC: 43a

If yes, does the depository permit its participants to open accounts in the participant's own nominee name(s)?

 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

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?

 Yes No

AGC: 44e.

If yes, please describe briefly under what conditions access would be granted to the intervening authorities:

It would be granted when, in accordance with their control powers, they administer participants accounts. For example under insolvency proceedings

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?

 Yes No

AGC: 44j.

By the CSD's creditors?

 Yes No

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?

- Hard copy
- Computer file
- 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 maintained 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

AGC: 46a.

If no or other, please explain

AGC: 46b, 46c.

If yes, please indicate the scheduled frequency:

- Quarterly
- Real time
- Upon request
- Daily
- Weekly
- Monthly
- 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
- 1 year
- 3 years
- 5 years
- 7 years
- 10 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:

AGC: 48a

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

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 (i.e. immediately with no time gap)?

 Yes No 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

 1 hour 2 hours 3 hours 4 hours 5 hours Overnight 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:

AGC: 51d

If registered, how are the CSD eligible securities registered?

- In the name of the CSD
- In the name of a separate nominee of the CSD
- In the name of the depositing participant or its nominee
- OTHER:

AGC: 51f

If in the name of a separate nominee, please identify by name the nominee used:

AGC: 51h

If CSD eligible securities may be held either in or out of the CSD, are these certificates:

- Bearer
- Registered

AGC: 51i

What are the control features for receipt of certificates to the CSD (e.g., authentication procedures, re-registration)? 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?

Yes  
 No  
 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  
 No

AGC: 52e

If yes, how are securities held at the registrar for the account of the CSD?

In the name of the CSD  
 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:

The beneficial owner  
 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

Rule 17f-7 requires that an Eligible Securities Depository "maintains records that identify the assets of each participant and segregate the system's own assets from the assets of participants."

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 No Not applicable

AGC: 55

Can the depository assess a lien on participant accounts? A lien would entitle the depository to take and hold or sell the securities of the participant in payment of a debt. (Choose all that apply.)

 Yes, for proprietary accounts (please answer 55a) No Yes, for client designated accounts (Please answer 55b)

AGC: 55a

If yes, for what reasons are liens or similar claims imposed for proprietary accounts? (Choose all that apply.)

 Fees and expenses Collateralization of overdrafts To secure payment for purchased securities OTHER:

AGC: 55b

Please describe:

AGC: 55c

Please describe highlighting any difference in approach between proprietary and client designated accounts.

AGC: 55d

Please indicate the limits of this lien as indicated below: (Choose all that apply.)

- Liens are limited to securities in the course of purchase and sale transactions, but do not extend to settled positions.
- Clients fully settled positions are protected from placement of Liens other than where there is a court order.
- Other (please answer 55g)

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
- The lien can only be placed for the securities/trades in question

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

AGC: 55k

If yes, are the restrictions accomplished by:

- Contract between the CSD and the participant

AGC: 55l

Please explain:

AGC: 56, 56e

Transfer of Legal Ownership. Does the CSD have legal authority to transfer title to securities?

 Yes No Not applicable Other: CVSA has 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 participant delivers the security with a valid transfer deed or stock power or other transfer document to the CSD which then effects registration. A registered certificate in the name of the CSD is delivered to the CSD. 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
- 3 days to 1 week
- 2 to 4 weeks
- More than 4 weeks
- Not applicable

AGC: 60  
During the process of lodging securities into the CSD, can the securities be traded?

- Yes
- No
- Not applicable

AGC: 60a  
During the process of lodging securities into the CSD, can the securities be settled?

- Yes
- No
- Not applicable

AGC: 60b  
During the process of lodging securities into the CSD, can the securities have ownership transferred?

- Yes
- No
- 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

- 1 to 2 days
- 3 days to 1 week
- 2 to 4 weeks
- More than 4 weeks
- 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
- No
- 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 beneficiary
- 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
- Not applicable
- 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
- Not applicable
- 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 Not applicable Yes

AGC: 66b 66c

If yes, please check all of the following that apply:

 The CSD assumes liability for indirect or consequential losses The CSD assumes liability for direct losses Financial limits are imposed on the amount of liability assumed by the CSD OTHER:

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 Not applicable

AGC: 66f

If yes, please check all of the following that apply:

 The CSD assumes liability for indirect or consequential losses The CSD assumes liability for direct losses Financial limits are imposed on the amount of liability assumed by the CSD OTHER:

AGC: 66i, 66l

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 Not applicable

AGC: 66j, 66k

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: 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:

The CSD assumes liability for indirect or consequential losses  
 The CSD assumes liability for direct losses  
 Financial limits are imposed on the amount of liability assumed by the CSD  
 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 indirect or consequential losses  
 Financial limits are imposed on the amount of liability assumed by the CSD  
 The CSD assumes liability for direct losses  
 OTHER:

AGC: 66u.  
Does the CSD guaranty settlement?

No  
 Yes  
 Not applicable

AGC: 66v.  
Please explain how this is accomplished. What are the procedures and safeguards that permit the CSD to guaranty settlement?

AGC: 66x.  
Any direct damages or losses to participants caused by the CSD as a result of force majeure events, acts of God, or political events, etc.?

Yes  
 No  
 Not applicable

AGC: 66.  
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: 66+  
In all cases where the CSD assumes responsibility for direct or indirect or consequential losses, is the CSD's liability limited by a standard of care determination?

- Yes
- No
- Not applicable

AGC: 66\*  
Please define the standard of care applied:

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

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AGC: 67d.  
Insurance

- Not applicable
- No
- Yes
- 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 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: 67l.

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?

 Yes No

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.?

- Yes
- No
- 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:

- Internet
- Dial-up modem
- Secured, leased, dedicated telephone line
- Fax

AGC: 70c.  
Please explain:

AGC: 71 71a.  
Regarding data security: Are passwords used by participants to access their accounts?

- Yes
- No
- Not applicable

AGC: 71c.  
Does each user have a unique user ID?

- Yes
- No
- Not applicable

AGC: 71e.  
Are passwords regularly changed?

- Yes
- No
- 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
- 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
- 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?

- other
- Internet
- Not applicable
- Paper
- Dial-up modem
- Secured, leased, dedicated telephone line
- Fax
- OTHER:

AGC: 73b  
How does the CSD communicate with Payment Systems?

- Secured, leased, dedicated telephone line
- Paper
- Dial-up modem
- other
- Not applicable
- Fax
- Internet
- 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
- Not applicable
- other
- Paper
- Fax
- Internet
- Secured, leased, dedicated telephone line
- OTHER: BYMA DIGITAL

AGC: 74  
How is access to the physical building controlled?

- By alarm system
- personal ID card
- By electronic keys
- By guards
- OTHER: Videocameras, fingertips

AGC: 74a.  
Please explain:

AGC: 75

What are the vault security procedures for the safekeeping of physical paper?

- Intrusion alarms
- Visitor logs
- Dual access control
- Electronic keys or combinations
- Vault counts
- Not applicable, no vault is maintained
- Fire alarms
- 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?)

- CCP covers the loss
- The depository guaranty fund covers the loss
- Depository insurance covers the loss (please answer 76a)
- Loss is shared among participants (please answer 76b)
- Other/Not applicable (please answer 76d)

AGC: 76a

Please explain the process:

AGC: 76b

Please explain the process of how the loss is shared:

- Equally, among participants
- Pro-rata based on participant's volume
- 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
- 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
- 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
- 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 depository have forms of oversight management for assessing and monitoring of the following? (Choose all that apply.)

- Debit caps for participants
- Participant financial strength
- Participant eligibility requirements
- Participant volumes
- Other loss or default protections the CSD maintains
- Not applicable (please answer follow up question)
- Settlement controls that minimize or eliminate the risk of default by a participant
- Collateral requirements for participants
- Blocking of securities movement before receipt of payment
- Blocking payment until securities are moved
- OTHER: Electronic transfers system controls.

AGC: 79  
Please provide the risk management framework (it can be a link or attachment at the end of this section)

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

- Simultaneous DVP
- Controlling DVP settlement
- Blocking or freezing of securities positions
- 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?

- Not applicable
- No
- Financial requirements for stock exchange membership
- Margin requirements for stock exchange members
- Guaranty fund for stock exchange members
- 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 part 1.  
Please identify the frequency of testing for the following third party:  
- Depository participants/members

AGC: 81b part 2.  
Please identify the last date of testing for the following third party:  
- Depository participants/members

AGC: 81c part 1.  
Please identify the frequency of testing for the following third party:  
- Stock exchange

AGC: 81c part 2.  
Please identify the last date of testing for the following third party:  
- Stock exchange

AGC: 81d part 1.  
Please identify the frequency of testing for the following third party:  
- Central bank

AGC: 81d part 2.  
Please identify the last date of testing for the following third party:  
- Central bank

AGC: 81e part 1.  
Please identify the frequency of testing for the following third party:  
- Local brokers

AGC: 81e part 2.  
Please identify the last date of testing for the following third party:  
- Local brokers

AGC: 81f part 1.  
Please identify the frequency of testing for the following third party:  
- Any other third party

AGC: 81f part 2.  
Please identify the last date of testing for the following third party:  
- Any other third party

AGC: 81a, 81h.  
Does your Business Recovery Plan include:

- Off-site operations facility
- Digital/electronic signing of documentation
- Remote working ability
- Back-up files stored and locked
- Off-site data storage
- Back-up of all computer files
- 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
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours
- 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
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours
- Not applicable

AGC: 84  
Will the CSD publicly announce any system interruption?

- Yes
- No
- 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 the CSD regulators
- To direct and indirect participants
- To the public via the internet
- To all direct participants
- 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
- Press release
- By telephone
- By e-mail
- 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
- Not applicable

AGC: 85a.  
If yes, how much time was needed to implement the recovery plan?

- Less than 1 hour
- 1 - 2 hours
- 2 - 4 hours
- Longer than 4 hours

AGC: 85b.  
How much time was needed to recover and restore business to normal operations?

- 1 - 4 hours
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours

AGC: 85c, 85d.  
What was the impact to the market?

- All cash settlements took place one business day late with good value
- All securities settlements took place as scheduled on the same day with good value
- All cash settlements took place as scheduled on the same day with good value
- All securities settlements took place one business day late with good value
- All securities settlements took place one business day late with value one day late
- All cash settlements took place one business day late with value one day late
- All securities settlements took place more than one business day late
- All cash settlements took place more than one business day late
- Even though there was a system failure, all fines and penalties for late settlements were still assessed
- As a result of the system failure, all fines and penalties for late settlements were waived
- OTHER: N/A

AGC: 86  
Has there been any material loss by the CSD during the past three years?

- Yes
- No
- 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?

- Yes
- No
- 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
- Yes for two of the last three years
- Yes for one of the last three years
- None of the last three years
- Not applicable

AGC: 89, 89b  
Does the CSD maintain a reserve for operating losses?

Yes  
 No  
 Not applicable

AGC: 89a.  
Please describe and indicate reserve (for operating losses) amount:

Legal reserve: ARS 21,799,391 ,000

Reserve for possible risks: ARS 22,831,065,000

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  
 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

Please confirm whether you maintain insurance policies to cover any liabilities and indemnities that you may incur in connection to the services you provide.

Insurance to cover losses in the event of Default on settlement commitments by the depository or a participant (please answer 91a)  
 Insurance for Operational Errors and Error & Omissions (please answer 91c)  
 Insurance for the Premises  
 No insurance  
 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) (please answer 91b)  
 OTHER:

AGC: 91a

For insurance of default on settlement, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

AGC: 91b

For Fidelity insurance, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

Coverage: USD 10MM

Deductible: USD 1.000.000.-

AGC: 91c

For Insurance for Operational Errors and Error & Omissions, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

A01

For Insurance for Operational Errors:

Coverage: USD 15MM

Deductible: USD 25,000.-

For Insurance for Errors and Omissions:

Coverage: USD 15MM

Deductible by event

Capital Market claim: USD 25.000.-

AGC: 91d

For Insurance for the Premises, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

A01

Coverage: 33.8MM

Deductible: USD 1.500.-

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.

SURA - MERIDIONAL/ZURICH & GALICIA SEGUROS

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 MONTH (extension of validity) 30/10/2025 (Others) 18 MONTHS. 30/04/2027 (Galicia Seguros)

AGC: 97c, 97d

Who does the insurance cover?

Not applicable

Final investors

Direct CSD participants

CSD

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:

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.
- No, I do not wish my response to be publicly available.

AGC: 99a

How will you be making your answers publicly available?

- Upon request
- Website
- OTHER:

AGC: 99b

This disclosure can also be found at the following web address(es):

<https://cajadevalores.com.ar/Institucional/7>

AGC: 99c

First and Last Name of the contact person:

ALEJANDRO BERNEY

AGC: 99d

How do you prefer to be contacted?

- Fax
- Telephone
- mail/air courier
- e-mail

AGC: 99e

Telephone number (please include the international country code):

+54 11 4316-6000

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:

alejandro.berney@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?

 Yes No

AGC: 101

Does your organization have a documented cyber security policy in place?

 Yes No<https://cajadevalores.com.ar/Institucional/5> - Políticas y reglamentos - Documentos asociados[https://cajadevalores.com.ar/uploads/2\\_P-59001-03-Pol%C3%ADticadesseguridadInformacion-CVSA.pdf](https://cajadevalores.com.ar/uploads/2_P-59001-03-Pol%C3%ADticadesseguridadInformacion-CVSA.pdf)

AGC: 102

Please confirm that your staff receive relevant training about this policy.

 Yes No

AGC: 103

Please confirm what topics are covered by your policy for continuity of business in the event of a large data breach or cyber attack against your organization.

- IT Asset & Inventory Management
- Logging, Monitoring, and Alerting
- Architecture Management
- Cyber Event Detection
- Incident Response and Recovery
- Access Management
- IT Protective Security Technology
- Security Awareness & Training
- Change Management
- OTHER:

AGC: 104  
In the last 12 months have there been any changes to the policy?

Yes  
 No

AGC: 105  
Please advise how often you review the policy.

Annually  
 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.

AGC: 107  
How does your organization identify cyber risks to business functions?

Risk and Control Assessments  
 External Reviews  
 Enterprise Risk Management Framework  
 OTHER:

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?

Encryption of data at rest  
 Encryption of data in transit  
 Anti-virus software  
 Anti-malware software  
 Intrusion detection systems  
 Intrusion prevention systems  
 Firewalls  
 Patch Management  
 User Access Controls  
 OTHER:

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  
 Not applicable as no outsourcing

AGC: 112  
What measures does your organization have to ensure early detection of a cyber attack?

Incident Response Plan  
 Searching for network traffic patterns  
 Searching for user login patterns  
 Logging of IT systems  
 OTHER:

AGC: 113  
What is the agreed resumption time for critical operations following a cyber attack?

8 - 24 hours  
 Longer than 24 hours  
 4 - 8 hours  
 1 - 4 hours  
 OTHER:

AGC: 114  
How would you advise clients of a successful cyber attack against your organization?

By e-mail  
 By telephone  
 Public announcement  
 Press release

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: 116a

Are the following elements of your cybersecurity framework tested pre deployment of changes?

- Testing of incident response process and technical/business/operations (e.g. table-top exercise)
- Scenario based penetration tests
- Vulnerability assessment
- 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 Ptest 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: 116b

Are the following elements of your cybersecurity framework tested 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:

AGC: 117

For cloud technology and associated cybersecurity risks, please confirm:

- (i) that you have procedures and controls in place to protect our information from mishandling or theft;
- (ii) how these procedures and controls tie back to your record retention policy

 Yes No Not applicable as cloud not used

AGC: 118

Does your organisation have a cyber threat intelligence programme to understand and protect against a potential threat actor's motives, targets, and attack behaviors?

 Yes No

AGC: 119

Is your organization aware of SWIFT's Customer Security Program (CSP)?

 Yes No

AGC: 120

Does your organization ensure compliance with SWIFT's CSP controls?

 Yes No