

Securities Position Management Across Multiple Custodians

Challenges, Solutions, and Future Outlook

18 September 2025

Massimiliano Saccani

Agenda



Introduction: Why is this a complex problem? What are the key pain points?



Intesa Sanpaolo Experience: How ISP manages its portfolio?



Feasible Solutions: How can we address them?



Required Improvements: What is needed for a more efficient future?



Conclusion and outlook

Introduction: Why Position Management is a complex problem?

Institutional investors, Banks and large fund managers often hold assets with multiple depositary banks (custodians) for different reasons such as access to specific markets or specialized services, regulatory or liquidity requirements or Fiscal Aspects and services offered by each Custodian or CSD. This fragmentation creates complexity in gaining a consolidated view of the portfolio

FRAGMENTED DATA FORMATS AND REPORTING STANDARDS ACROSS CUSTODIANS

- Position data received from custodians often have different formats, structures, and naming conventions
- Difficulty in reconciling balances and transactions
- Custodian reports are not always available in real-time or at the same frequency. Some provide end-of-day data, others with a delay

MARKET-SPECIFIC REGULATIONS AND COMPLIANCE REQUIREMENTS

- Market-specific regulations and compliance requirements
- Inconsistent cut-off times and settlement deadlines
- Limited interoperability between infrastructures

OPERATIONAL AND COMPLIANCE RISKS

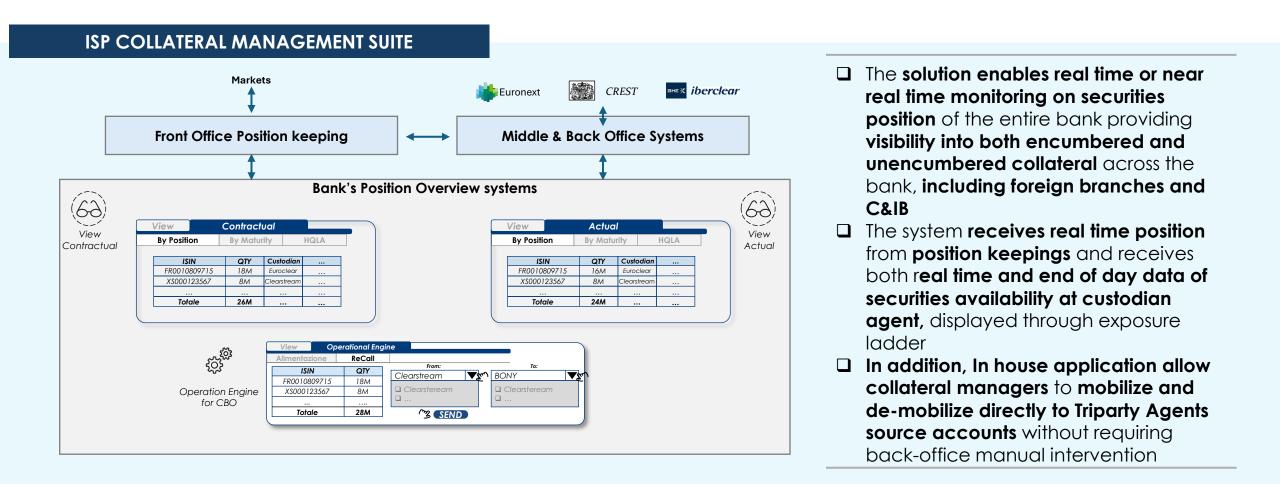
- Difficulty in reconciliation which is important to reduce liquidity risks, incorrect available balance and penalties
- Time reduction introduced by the Euroepean Settlement T+1 Project will increase complexity

COSTS AND RESOURCES

• The manual management of these activities requires a dedicated team, with significant time and resource expenditure

Intesa Sanpaolo Experience: How ISP manages its portfolio?

Over the past few years, Intesa Sanpaolo has faced the significant challenge in terms of collateral management, as this dimension - its measurement and rapid mobilization - is taking on an increasingly central role. To achieve this, the group has adopted a hybrid solution that involves the use of a highly customized third-party software alongside the development of some applications entirely in-house



Feasible Solutions: How can we address them?

DATA AGGREGATION SYSTEMS



- Portfolio Management Systems (PMS): Use specialized software that connects to various custodians via APIs or standardized data feeds (e.g., SWIFT)
- Centralized Data Warehouse: Create an internal database to standardize, cleanse, and consolidate data before use

AUTOMATION AND RECONCILIATION



- Automated Reconciliation Software: Use algorithms that compare internal data with custodian data, automatically flagging discrepancies
- Use of Machine Learning Algorithms: To identify error patterns or anticipate reconciliation problems

SWIFT and API Integration:



- **SWIFT**: Use standardized SWIFT messages for the exchange of position and transaction information
- APIs (Application Programming Interfaces): Request that custodians provide robust APIs for near real-time data access

INTERNAL STANDARDIZATION:



- Define and implement internal protocols for data mapping and corporate actions management
- Create a cross-functional team of experts for data and reconciliation management

Required Improvements: What is needed for a more efficient future?

For effective management of collateral and positions across different custodians, **efforts by financial institutions alone are not sufficient**; a **holistic approach is needed**, involving systemic changes **from all stakeholders**, including custodians themselves, CSDs, CCPs, and regulators

INSTITUTIONS

CUSTODIANS

- Greater Standardization: Unify report formats and securities naming conventions
- Open and Robust APIs: Provide API access for position data, transactions, and corporate actions in near real-time
- Value-Added Services: Offer pre-built reconciliation platforms for clients

CLEARING HOUSES AND CENTRAL SECURITIES DEPOSITORIES

- Harmonization of Corporate Actions: Synchronize the processing of corporate events across various markets
- Data Integration: Facilitate access to standardized data on a global scale



REGULATORS

Promote Uniform Standards



- Regulators (e.g., ESMA in Europe, SEC in the USA) should encourage or mandate the adoption of standard reporting and messaging formats
- E.g., the adoption of ISO 20022 for financial communications

Transparency Requirements

- Require custodians to provide more frequent and transparent data on held positions
- Ensure that data regulations (e.g., GDPR) do not hinder efficient portfolio management

Support Digitalization

 Incentivize the use of innovative technologies (e.g., DLT/Blockchain) that could solve reconciliation issues at the root by creating a shared and immutable ledger of positions

Conclusion and outlook

- ✓ The problem of multi-custodian position management is real and complex
- ✓ Technological solutions exist but require investment and integration
- Collaboration among all stakeholders (investors, custodians, regulators) is fundamental

The future points towards greater standardization, automation, and potentially the adoption of a Distributed Ledger Technology (DLT) infrastructure for a unified real-time view of positions