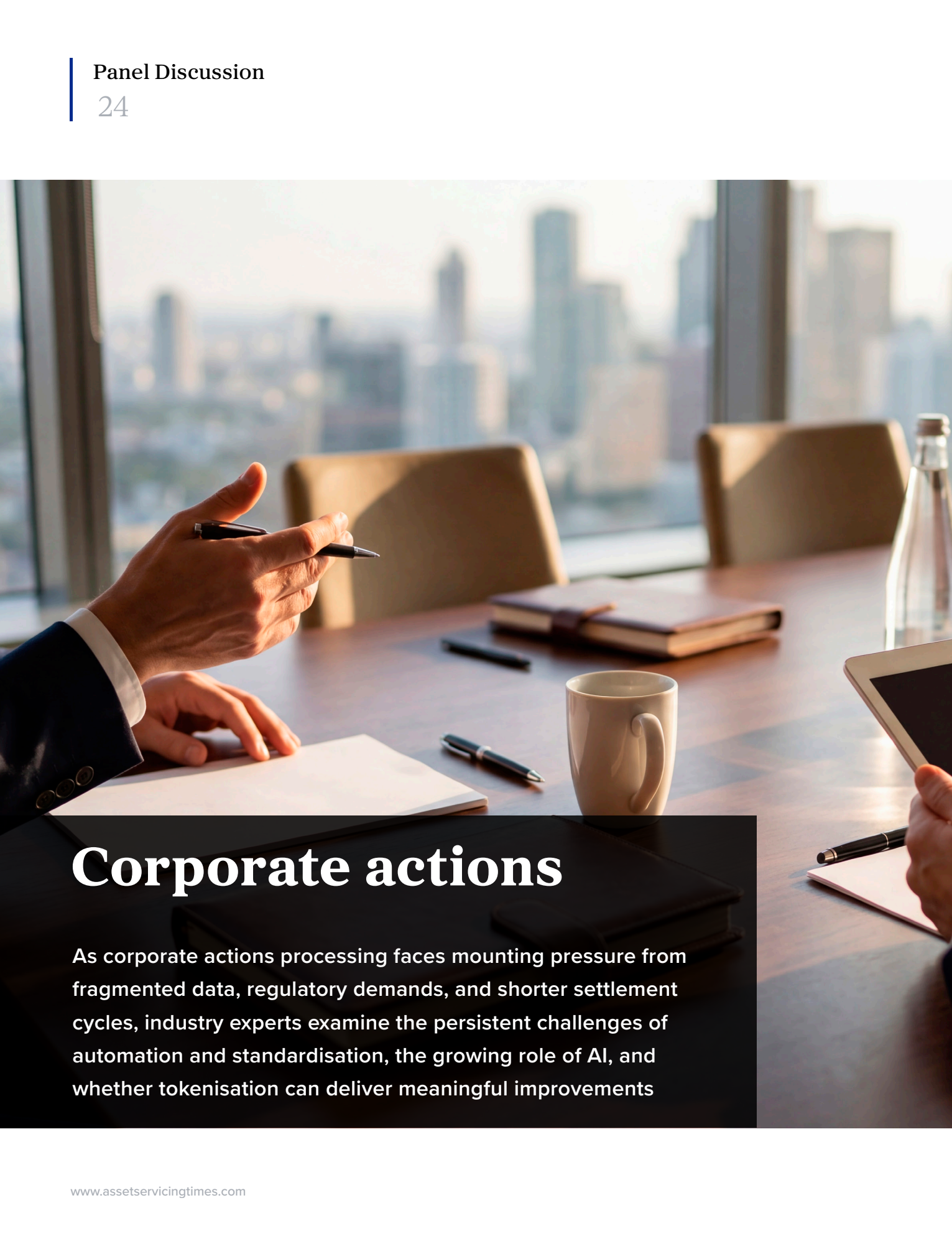


A person in a dark suit is seated at a wooden conference table, holding a pen over a notepad. The table also holds a white mug, a pen, and a closed notebook. In the background, a large window offers a view of a city skyline. To the right, another person's hand is visible holding a tablet.

Corporate actions

As corporate actions processing faces mounting pressure from fragmented data, regulatory demands, and shorter settlement cycles, industry experts examine the persistent challenges of automation and standardisation, the growing role of AI, and whether tokenisation can deliver meaningful improvements


Mariangela Fumagalli

*Head of Asset Servicing Product and Custody
Regulatory Solutions, Securities Services
BNP Paribas*

Mike Wood

*Head of Asset Servicing
Broadridge*

Roann Hautus

*Group Manager Market Solutions & Banking Services
CACEIS*

James Thursfield

*Vice President, Custody Services
and Derivatives Operations
CIBC Mellon*

Swapnil Gupta

*Director - Commercial & Product Strategy,
Corporate Actions
S&P Global Market Intelligence*

Adam Cottingham

*Global Head, Smart Actions
Smartstream*

David Baxter

*Managing Director
T-SCAPE*

Where does corporate actions processing still break down most often today: announcement capture, data validation, entitlement calculation, or election handling? Has that weak point shifted over the past five years?

Mariangela Fumagalli: Processing does not really “break down”, it is not as automated or straight-through as it could be. Standardisation and harmonisation, especially in the biggest countries like the US and Europe, have improved automation overall. However, this is not true for all countries, which could benefit from adopting the same standards and removing several paper-based processes. Moreover, while standardisation and

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Swapnil Gupta

automation occurred in the communication/exchanges across intermediaries and between intermediaries and their customers, the same cannot be said vis-à-vis issuer/issuer agents. Therefore, more is to be expected in this area. We are seeing initiatives across a few countries to promote standards for issuer agents, but there is still a long way to go.

Mike Wood: Our experience at Broadridge indicates that the biggest break point is still upstream: announcement capture and, especially, data validation. Entitlement calculation is relatively mature for standard events; the more difficult downstream challenge is election handling for complex voluntary events. Over the past five years, the weakness has shifted from core processing capacity to confidence in the data feeding the process.

David Baxter: Where a breakdown occurs does not necessarily tell you where the problem started. A downstream break can originate much earlier in the process, sometimes outside the organisation experiencing it.

Individual organisations will have their own weaknesses, but across the market the biggest challenge remains at the start: establishing an authoritative, structured record of what the issuer intends. That is what we refer to as an issuer-validated Structured Business Event, and after more than 20 years of discussion, that fundamental challenge remains unresolved.

So, despite improvements elsewhere in the process, I do not think that underlying weak point has shifted. You only have to look at the conversations and airtime still given to it at events like Sibos, POSTTRADE360, and ISITC.

Roann Hautus: The weakest link is still at the front of the chain: announcement capture and data validation. If the event is captured late, incompletely or with conflicting terms, every downstream step inherits the error. Entitlement calculation is now largely automated and rarely the root cause.

The weak point has shifted though. Five years ago the issue was mostly getting the data at all. Today it is reconciling several sources that disagree, often on complex or cross-border events. Election handling remains the riskiest step financially, because a missed deadline is hard to reverse. But the failures there usually trace back to poor or late data upstream.

James Thursfield: It varies considerably by market. In Canada, one of the persistent challenges has been the standardisation of SWIFT corporate actions messaging coming from the depository. That affects announcement capture and can create additional work as information moves through the chain. Internal platforms and processes also matter, particularly around areas such as entitlement calculation and election handling. For example, Canada's central securities depository (CDS) does not accept SWIFT instructions, and our efforts within the market to get this prioritised can be difficult because not all firms are as SWIFT capable as CIBC Mellon and BNY.

The encouraging part is that the industry is investing heavily in technology to address these friction points. We have seen improvements in areas such as entitlement calculation, while greater automation and better connectivity are helping streamline processing and reporting. For CIBC Mellon and other scale providers, continued technology investment is an important part of delivering faster, more consistent outcomes for clients.

Adam Cottingham: Failure to define a corporate action at announcement will break in processing. Stressed and late processing compounds the operational risk. This is an alignment challenge across the issuer, the chain of custody and the beneficial owner. Errors at announcement capture and validation multiply across positions in the book of record and deposit accounts, and flow through election decisions, event accounting, and tax.

The weak points remain and the pressure is increasing. Issuers raising capital and managing debt, and market competition, are driving event volumes and producing more complex terms, with cross-border and tax dependencies. Under T+1's shorter settlement cycles, event processors have no slack to recover from data discrepancies, while legacy systems and manual processes remain the norm.

Event risk defines operational risk in asset servicing, measured across event type, market rules, position type and size, custodian network processing variances, and operational capacity. Measuring event risk is essential to mitigating operational risk and creating alignment.

Swapnil Gupta: Five years ago, the challenge was capturing announcements. Today, it is validating and interpreting them. Issuers are becoming increasingly creative in how events are structured and communicated, while information continues to flow from multiple sources with varying levels of detail. The challenge is particularly evident in funds, where distribution remains fragmented. The industry's biggest issue is no longer obtaining information but determining which version can be trusted and acted upon.

The industry has talked about a 'golden source' for event data for two decades. Why does one not exist yet, and is anyone actually close?

Wood: Technology is not the main issue here. If it was, we would be thrilled to have fixed it. Ownership, incentives, and liability are the root cause. Issuers, agents, CSDs, custodians, and vendors all contribute data to the process, but no one party wants open-ended responsibility for an error that travels through the chain.

CSDs are probably the most credible point to bring the market together around a shared corporate-actions data standard or 'golden record'. They sit close to the top of the post-trade chain, receive issuer information early, and already connect with many market participants. So they are well placed to convene issuers, agents, custodians, regulators, and technology providers to agree on the data, governance, and accountability model. The industry is closer to federated, governed golden records than one universal source today.

Baxter: Partly because the tools have been limited. Manual input templates and mandated submission formats have helped in some markets, but they only go so far. Today, we have tools capable of doing much more.

But I think the bigger issue is the approach. Too much of the discussion has treated the absence of a golden record as the issuing party's failure, with the answer being to persuade or compel them to produce one. Too little attention has been given to how they could share in the value created. If the market research stacks up, that value is significant.

We need to put the technology in the hands of the issuer or its agent, enabling them to create a Structured Business Event and validate that its business outcomes reflect issuer intent before announcement publication.

Why would they take this on when previous attempts have struggled? Because the economics would be different. Downstream beneficiaries would fund the work, creating revenue for the agents supporting it and allowing issuers to benefit through reduced service costs. These are themes we explore in T-Scape's Point of View publications, 'The Last Interpretation' and 'The Price of Trust'.

Is anyone close? Some market participants would undoubtedly say so. But much of the effort remains focused on establishing a trusted record after publication rather than before. That leaves us with a golden interpretation, however sophisticated the means of producing it. What is missing is the issuing party's validation that the business outcomes are those it intends.

Thursfield: The golden source would ideally be the issuer announced, machine readable, disseminated event. Announced over a chain, event notification information, responses, and payments would flow without delay or the need for any interpretation. In today's corporate actions environment, the relevant depository is used as the authoritative source because it sits close to the issuer and transfer-agent ecosystem. But declaring something the 'golden source' does not automatically make the data standardised, complete, or readily consumable by every participant downstream.

That is really the industry's challenge. Different organisations have different systems and data requirements, and they need to determine which information is relevant to intermediaries and what ultimately needs to reach investors. Rather than waiting for a perfect universal golden source, the focus should be on improving data quality, standardisation, and interoperability across the ecosystem so that authoritative information can flow much more efficiently from issuer to investor.

Hautus: Because the only true golden source is the issuer, and issuers are still not required to publish event terms in a structured, machine-readable format. Most announcements still start life as a PDF or a press release. Everyone downstream then re-keys and interprets the same information, and divergence starts there.

The second obstacle is commercial and jurisdictional. Data vendors, CSDs, and agents each own part of the picture, and

“The mechanics of an industry 'golden source' have been understood for 20 years, but no authority or consensus exists to create one”

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market practice differs from one country to another. Nobody has both the mandate and the incentive to consolidate it.

No one is fully there yet. Where CSDs act as the issuer's reference point, data quality is noticeably better. Structured issuer-to-market publication is the most promising route, whether through standard messaging or digital platforms. It will take regulation to make it the norm rather than the exception.

Fumagalli: There has not been sufficient push for issuer and their agents to automate the announcement of corporate events and ensure all required data is communicated along the chain of intermediaries to the investors. Shareholder Rights Directive (SRD) II was a step in the right direction, but it did not go as far as expected. In the review of SRD II, a key improvement could be to promote standardisation and automation in the communication from issuer/issuer agents to the first intermediary (issuer CSD).

Cottingham: The mechanics of an industry 'golden source' have been understood for 20 years, but no authority or consensus exists to create one. Collaborations have led to proofs of concept, and commercial offerings have varying capabilities to meet service standards, but without accountability underwritten by liability. Issuer attestation is absent. Market structure, legacy infrastructure, and misaligned commercial models throughout the processing chain mean corporate actions operations, and the beneficiaries of those events, will be served by many 'silver sources' of event data, causing operational variance and increasing event risk. The 'truth source' of event data exists in the documentation produced by issuers and in exchange bulletins. Vendor-enabled AI extraction has reduced the effort of consuming it, and ISO 15022

and ISO 20022 provide a benchmark for adoption. Technology that supports alignment across counterparties within the event lifecycle, with granular reconciliation of positions, election outcomes, and payments, makes a 'documentation-verified truth source' available without a 'golden source'.

Gupta: Because corporate actions are ultimately an interpretation problem, not a data problem. The same event can originate from multiple parties and be communicated differently as it moves through the market. A golden source is not created through aggregation alone. It requires validation, normalisation, context, and expertise. The real objective should be a trusted golden record, where users understand not only the data itself, but why that interpretation can be relied upon.

How far has the move to ISO 20022 messaging for corporate actions progressed in practice, versus on paper? Is running MT and MX formats side by side creating more reconciliation work, not less?

Baxter: With DTCC adopting ISO 20022 and SRD II driving its use in Europe for meetings and shareholder identification disclosures, I expected us to be further down the road. Through our work with iActs, we still see inconsistencies in SRD II implementation. We highlighted some of those in our response to the European Commission's consultation earlier this year, and hopefully that will help drive improvements.

For wider corporate actions, ISO 20022 is already supported in parts of the market, but consistent adoption through to downstream clients still feels some way off. The European CSD migration roadmap targets ISO 20022 for corporate actions by the end of 2030, with a subsequent decision on phasing out ISO 15022. That should help, but 2030 is not far away, and I suspect coexistence will be with us for a while.

Technically, coexistence is manageable. A well-designed processing solution should support both formats. What matters is how it translates the information into business meaning.

Many years ago, someone asked me how much training they would need to understand ISO 15022 messages. My answer is the same today: it depends on how good your processing solution is at translating them into business language. If it does that well, users should not need to become messaging specialists. And coexistence does not necessarily mean receiving the same event twice in different formats. An organisation might receive meetings

in MX and other corporate actions in MT. A direct Depository Trust & Clearing Corporation (DTCC) participant might receive MX but pass information to clients in MT. It is not ideal, particularly if information is lost in translation, but it works. Ultimately, an issuer-validated Structured Business Event would give us a trusted source from which to generate whichever formats participants need, while preserving the underlying business meaning.

So yes, coexistence could create more work, but it does not have to.

Hautus: On paper, the standard is mature: the corporate actions message set has existed for years and market practice groups have aligned on it. In practice, adoption is uneven. Some market infrastructures use ISO 20022 natively, but most of the custody chain still runs on MT messages, and there is no hard switch-off date for securities as there was for payments.

Running both formats side by side does add work in the short term. Translation between MT and MX can lose or truncate data, so firms have to check that nothing was dropped. The richer MX format only pays off when it is used end to end, from issuer to investor. Until then, coexistence mostly adds a mapping layer rather than removing reconciliation.

Fumagalli: All our shareholder identification and general meeting communication is via ISO 20022. For the rest of corporate events, since all messages are reversed engineered between ISO 20022 and ISO 15022, there is no reconciliation work but a simple translation from one standard to the other.

Cottingham: ISO 20022 adoption is happening slowly. Key players are processing ISO 20022 messages, but not exclusively. Swift's mirroring of changes across both ISO 15022 and ISO 20022 dilutes the incentive to migrate. A dual standard for asset servicing is here to stay. Interoperability is a necessity because partial adoption happens at message level, for specific processes within a counterparty's event lifecycle. That creates reconciliation work unless it is managed: every translation can lose or reshape data, and every dual-format event must be matched to its counterpart.

This challenge is an opportunity for firms to accelerate the maturity of their processes. The same fundamentals of data object modelling that accommodate variation in data standards underpin automated processing, matching and reconciliation, aligning events, and their accounting across counterparties. They also make integration easier with counterparties that follow neither standard.

Wood: Progress is real, but uneven: ISO 20022 is more established in standards and in parts of the custody infrastructure than in issuer-to-investor operating reality.

Running the older SWIFT format (MT) in parallel with MX, the newer XML-based format, means firms are often having to support two message formats at the same time. During the transition, the same corporate action may arrive, be sent, or be processed in both formats. That can create extra work because teams and systems may need to translate, compare, reconcile, and investigate differences between the versions. Rather than reducing manual work immediately, running both formats can temporarily add another layer of checking and reconciliation.

Thursfield: The industry is clearly progressing toward MX, but we are still in a transition period in which clients and market participants may be operating with different messaging formats. For CIBC Mellon as a high scale provider, part of our role is to insulate clients from some of that complexity. CIBC Mellon has invested in the technology and connectivity required to receive different formats and perform the necessary conversion on the back end. We have built the technology to automate the reconciliation challenges on behalf of our clients.

Ultimately, there will be industry deadlines for migration, but during the transition our objective is straightforward: whether clients are currently operating with MT or MX, we want to make that transition as seamless as possible.

Gupta: The industry is committed to ISO 20022, but moving away from ISO 15022 takes considerable effort. For many firms, it means changes across technology, data mapping, and established workflows. That is why although adoption is happening at a high speed, both standards likely will coexist for some time. The benefits are clear, but getting there is a significant transition.

How are rules on shareholder rights and transparency, such as SRD II in Europe, changing expectations for intermediaries regarding proxy voting and information flow down the chain?

Hautus: SRD II turned intermediaries from passive conduits into accountable links in the chain. They must pass information between issuers and shareholders without delay, support shareholder identification, and confirm that votes were received and counted. Charges must be transparent and non-discriminatory between domestic and cross-border holdings.

“The broader trend is clearly toward greater transparency and more effective information flow between issuers, intermediaries, and investors”

James Thursfield

The effect is that ‘best effort’ is no longer enough: clients and issuers expect timely, traceable, and standardised flows. The remaining gap is consistency, because national transpositions and market practices still differ. That makes cross-border chains, with several intermediaries in between, the hardest part to get right.

Wood: SRD II raises the bar for timely, traceable shareholder identification, meeting information, and voting instructions moving through every link in the chain.

Intermediaries are expected to provide less opaque, more auditable proxy-voting workflows and not simply pass information on, but demonstrate that it arrived, was actionable, and was processed on time.

Baxter: SRD II or otherwise, intermediaries should enable shareholders to exercise their rights, with timely information, a reliable route for instructions, and evidence of the outcome. The technology exists to support that. Implementation is taking longer. Of course, what that means in practice depends on where each intermediary sits in the chain and who makes the voting decision. Just as issuers have agents, investors may appoint investment managers to act on their behalf. For an individual retail investor, a portal may provide a straightforward way to vote. Within an investment house, however, the meeting must connect to holdings, mandates, decision makers, approvals, and deadlines. More recently, pass-through voting has added another dimension, giving underlying clients a greater say in how votes are cast.

Our experience with iActs Vote Manager demonstrates why those internal processes matter. The potential for dual-loop workflows,

connecting an institution’s own voting process with that of its clients, extends that need for governance across both.

As new digital voting platforms are introduced, interoperability needs to be integral to their implementation. Institutions should be able to receive meeting information, manage decisions through their chosen systems, and return instructions digitally. Practical integration through APIs and ISO 20022 messaging is what connects those processes across platforms and organisations.

Shareholder identification provides a useful comparison. In our own processing experience, we have returned responses to disclosure requests within minutes of receipt. Meetings involve different decisions and dependencies, of course, but it shows that technology need not be the source of delay.

Cottingham: Exercising the right to govern an issuer, through meetings and votes based on the eligibility of your position, is a legal expectation as well as a principle of responsible ownership. SRD II expects that right to be exercised electronically, through standardised messaging, and facilitated efficiently, transparently, and at a proportionate cost: information passed down the chain without delay, votes passed up it, and confirmation that votes were counted.

A review of the directive is under way, with a commission consultation opened in February 2026, and commentators expect a possible SRD III to address weaknesses in the intermediary chain. Effective governance of the proxy chain will need to become more transparent and technology-driven.

Thursfield: The broader trend is clearly toward greater transparency and more effective information flow between issuers, intermediaries, and investors. We see that not only through regulation but also through the expectations of institutional investors themselves. Asset owners and managers increasingly want access to better information to support investment stewardship, disclosure, and proxy-voting decisions. As an example, we had the pleasure of having the CEO of UPP, one of Canada’s fastest growing pensions, and the sustainability leader from Mackenzie Investments on our podcast recently, and they discussed an initiative to push greater transparency around sustainability information.

For Canadian investors operating internationally, this is also where the value of a global network becomes important. European requirements clearly affect Canadian institutions investing in those markets. Through the broader BNY network, and allies

like Proximity. We can draw on expertise in those jurisdictions while continuing to provide Canadian clients with local servicing and support. Ultimately, our role as an intermediary is to help information move reliably through that chain so investors can exercise their rights and make informed decisions.

Fumagalli: We believe in a seamless exchange of information between issuer and their investors for general meetings and all corporate events. Looking at the next few years and the review of SRDII in Europe, real-time access to general meeting information and real-time voting, with investors voting directly from their smartphones for example, would be major improvements. As would be an increased engagement from investors and more scrutiny of meeting resolutions. Further standardisation and automation in general meeting processes to ensure an effective and efficient exchange of information between issuers and investors would also be important enhancements for shareholders.

Gupta: SRD II has raised the bar for transparency and shareholder participation, and a potential SRD III is expected to place even greater emphasis on information flows and voting processes across the intermediary chain. This is increasing demand for proxy and governance solutions, but it also highlights a broader industry need for standardised data, messaging, and workflows to support consistent and auditable communications.

Where is AI being used in corporate actions right now, beyond pilots? And who is accountable when a model misreads an event and a client misses an election?

Hautus: Beyond pilots, AI is mainly used at the front of the chain. It extracts terms from unstructured announcements, compares data from several sources, and flags anomalies for review. It also helps teams prioritise complex events and summarise them for clients.

Accountability does not move to the model. The firm that provides the service remains responsible to its client, exactly as it would for a human error. That is why AI outputs on critical data and elections are kept under human validation, with controls and traceability on every step. AI should speed up the work and sharpen controls, not replace the sign-off.

Wood: The most practical uses are in extracting and normalising announcement data, spotting inconsistencies across sources, prioritising exceptions, and supporting reconciliation and workflow

“Given the value that could be created, why not put those same technologies in the hands of the issuer or its agent?”

David Baxter

triage. AI should be a control layer, not the final decision-maker for high-risk events: accountability remains with the regulated firm and its designated operational and risk owners, not with the model or vendor.

Looking ahead, AI-based capabilities will be ubiquitous in the corporate actions platforms used by operations teams. The value will not come from simply adding AI to existing processes, but from embedding it throughout the workflow: interpreting announcements, enriching and validating data, predicting exceptions, orchestrating case management, and helping teams focus their attention where their judgement is genuinely required. This should allow operations to move from manually processing every event to actively overseeing automated, controlled workflows.

At Broadridge, we are also working on an interesting AI-driven concept for corporate actions claims management that would have AI orchestrate matching and exceptions through to closure.

Cottingham: AI regulation is converging on assistive, human-in-the-loop use with transparent, auditable decision making. The EU AI Act is being phased in; cautious governance is the sensible approach. Generative applications integrated into client systems through the Model Context Protocol (MCP) are in production.

Data sourcing, documentation extraction, and reconciling updates against unstructured narrative speed alignment with the issuer and improve data quality. System data also supports external agents for operational KPI, risk, and election analysis. Applications run within technology guardrails and hooks, and are tested and monitored for model drift in output and cost. Next

“We believe in a seamless exchange of information between issuer and their investors for general meetings and all corporate events”

Mariangela Fumagalli

are agentic workflows for elections and communications, with a human approving each election. Accountability does not change because a model is involved. The firm serving the client carries the contractual duty of care, and fault turns on the checks within the process: audit logs, confidence thresholds, documented escalation rules, and evidence that a human saw what the model was unsure about and validated the outcome.

Thursfield: Today, we see the most practical application of AI in corporate actions on the knowledge and client-service side rather than in autonomous transaction processing. AI can help research events, interpret information, and enable employees to respond more quickly to client questions. We are not relying on AI to independently process client elections. More broadly, we believe one of the most important AI investments an organisation can make is in its people, governance, and culture. At CIBC Mellon this includes a team of AI champions focused on learning and enhancing together, as well as building AI in a manner consistent with high governance standards — and we have some of our corporate actions colleagues as part of it.

This approach is helping us build AI literacy, creating appropriate controls and enabling employees to experiment within a consistent enterprise framework. Rather than isolated AI solutions developed independently across individual functions, we are driving responsible adoption at enterprise scale, drawing on the powerful capabilities and best practices from our parent companies CIBC and BNY. AI does not change accountability. If a client provides a valid instruction before an applicable deadline and we fail to execute it properly, we remain responsible. Technology can enhance the process, but it does not remove human or organisational accountability.

Baxter: There are a few areas: reading announcement documents, supporting investment and voting decisions, and helping teams investigate exceptions. Of those, decision support is particularly interesting, although how it is used will depend on the organisation’s policies, mandates, and controls. For me, though, the biggest opportunity for the market as a whole is turning announcement documents into structured event information. The question is where we apply that technology.

Much of the attention remains on applying AI after announcement publication instead of before it. Whether that is one model or several models looking to reach consensus, the result is the same: a golden interpretation.

Given the value that could be created, why not put those same technologies in the hands of the issuer or its agent? A Structured Business Event could be established at source and then processed to extract the resulting business outcomes. Those outcomes would be presented back to the issuing party in clear business language for validation before publication. They would be confirming that the outcomes reflect what they intend — not being asked to understand a technical message or approve a record they cannot meaningfully assess.

And who is accountable? Today, the organisation relying on the AI output still has to take responsibility for how it checks and uses it. But if we remove the need for interpretation after publication, accountability for confirming the event’s intended business outcomes sits where it should — with the issuing party.

Gupta: The real impact of AI in corporate actions is not simply doing the same work faster. It is enabling more validation, earlier identification of risk and a more proactive operating model. As routine processing becomes increasingly automated, human expertise shifts towards judgement and exceptions. What does not change is accountability: that remains firmly with the institution.

When a voluntary election is missed or wrong, who usually ends up absorbing the loss: the custodian, the asset manager, or the end investor?

Thursfield: There is not a blanket rule because responsibility depends on where the failure occurred and whether each party fulfilled its obligations.

If an asset manager provides a valid election to us before the established deadline and we fail to process it correctly,

responsibility rests with us. Conversely, if the asset manager does not provide the necessary instruction before the applicable deadline, responsibility would generally sit with the asset manager.

But our focus is less on assigning blame and more on preventing that outcome in the first place. We are continuing to invest in technology/platforms, clearer communication, stronger controls, and capabilities that support processes such as proxy management — for example working with allies like Proximity.

The goal is continuous improvement: helping all participants reduce operational risk and ultimately deliver better outcomes for investors.

Cottingham: Best practice is to manage each election at account level as a systematic, deadline-driven process, monitored within an event risk framework. Operational teams that can evidence transparency, validation, and quality-gating of information are best placed to recover from a provider further up the chain. With the right technology and operational governance, the contract is a backstop, not the first resort.

When an election is missed or wrong, the loss typically lands first on the firm closest to the client, which may compensate to protect the relationship and avoid a breach. The error itself can arise anywhere in the information chain: interpretation of narrative, updates, restrictions, or a misunderstood email election.

Custodians absorb the loss only when they can be shown to have breached their standard of care, and even then caps and exclusions often limit recovery.

Baxter: There is not one universal answer. It depends on where the failure occurred, the responsibilities of those involved and what the evidence establishes. A custodian failing to communicate an additional benefit available for an early response is a different failure from an investment manager receiving the relevant information but missing the deadline.

We experienced a case involving a loss of approximately £700,000 where the custodian initially blamed the investment manager, pointing to our iActs platform. The audit evidence enabled us to demonstrate that the fault lay in the custodian's systems. The custodian ultimately absorbed the loss.

That is the commercial value of process governance. Preventing failures is the priority, but when something does go wrong, being

“Losses are often contested or allocated among the custodian, asset manager and end investor depending on where the failure occurred”

Mike Wood

able to establish what happened, when, and where responsibility lay can make a substantial financial difference.

Hautus: It depends on where the failure happened, and what the contract and service levels decide. If the custodian is notified late, gave wrong terms, or failed to act on a valid instruction, the custodian typically compensates. If the asset manager instructed late or incorrectly, the loss usually sits with the manager.

The end investor should be the last to bear it, and in a well-run chain rarely is. The harder cases are where responsibility is shared, such as ambiguous terms or a deadline that shifted. That is why audit trails, clear deadlines, and timestamped confirmations matter so much: they settle the question quickly.

Wood: It depends on the facts, service agreement, and evidence trail, but the custodian or intermediary is often the first party exposed because it controls the client-facing processing obligation. Losses are often contested or allocated among the custodian, asset manager, and end investor depending on where the failure occurred. Unclear data provenance makes that process slower and more contentious.

Gupta: There is no single answer because it depends on the service model, contractual arrangements, and where the breakdown occurred. What is consistent is that voluntary events remain one of the highest-risk areas in corporate actions.

They combine changing information, tight deadlines, and investor choice, making even small operational failures capable of creating significant financial and reputational consequences.

“When holdings sit on a shared ledger, everyone sees the same positions, so entitlement and reconciliation work shrinks”

Roann Hautus

Does tokenisation or DLT solve anything real in corporate actions, or does it just move the same data problem onto a new rail?

Baxter: Smart contracts can automate execution using terms defined upfront or supplied later when a corporate action is announced. But those terms still have to come from somewhere, and someone needs to establish that they correctly reflect what the issuer intends. Any necessary investment decisions, approvals, and instructions also remain part of the process. So, tokenisation does not, by itself, resolve the underlying data problem. If a published announcement still has to be interpreted before its terms are supplied to a smart contract, the same uncertainty has simply moved onto a different infrastructure.

That is why an issuer-validated Structured Business Event matters just as much for tokenised assets. Establishing authoritative event information before publication provides a foundation for both existing processing systems and programmable execution. Process governance remains necessary to manage decisions, responsibilities, deadlines, and exceptions throughout the lifetime of each event.

We do not need to wait for tokenisation to establish that foundation. Doing so now would address an existing weakness while preparing the industry for what comes next.

Cottingham: Tokenisation speeds the passing of events and reduces reconciliation and payment lag, but it requires data consistency or it accelerates breaks. That suits mandatory event processing and accounting in a T+0 environment. Post-trade

applications of distributed ledger technology (DLT) are emerging where the data consistency issue has been resolved.

For voluntary events, the interpretation of optionality in the chain of custody creates data volatility, which causes breaks, and election decisions that wait on interpretation add delay.

Positions, elections, and payments must be reconciled and aligned on time, or election risk and payment risk will accelerate. Tokenisation does not remove the data problem. It moves it onto a faster rail.

Wood: It can help with shared visibility, time-stamped records, and more direct coordination where ownership and event data are already trusted and standardised. But it does not solve the underlying issues of poor announcement data, unclear entitlement rules, or liability: without data integrity and common operating standards, DLT simply moves the same exceptions onto a new rail.

Thursfield: I think we are very early in this move. Before we can properly evaluate the impact of tokenisation on corporate actions, the industry needs meaningful volumes of tokenised assets actually moving through servicing environments.

There is certainly potential for new infrastructure to improve aspects of the process, but a new technology rail does not automatically solve fundamental questions about data quality, standardisation, instructions, controls, and accountability.

The real test will come as tokenised assets move from experimentation toward scale. At that point, we will be better positioned to determine where the technology genuinely removes friction from corporate actions and where existing challenges simply need to be solved in a new environment. Nonetheless, it is an exciting time and we see this as a key area for innovation and opportunity where we are happy to engage alongside CIBC and BNY.

Hautus: It solves part of the problem. When holdings sit on a shared ledger, everyone sees the same positions, so entitlement and reconciliation work shrinks. Smart contracts can also automate simple, mandatory events such as coupons or splits when corporate action logic is pre-programmed directly into the contract.

In practice, the execution method varies depending on the event type: cash payments are typically handled in fiat offchain, whereas tokenised distributions, such as stock dividends or share splits, must be delivered onchain.

But DLT does not fix the data at its source. If the issuer's terms are ambiguous or published late, the ledger simply carries the same error faster. The real gain comes when issuers publish event terms directly on the ledger in a structured form. For now, most corporate actions on tokenised securities are still processed offchain, including at CACEIS, which currently does not perform onchain corporate actions.

Gupta: Tokenisation can improve the movement of information and ownership records, but it does not remove corporate actions complexity. Dividends, elections, reorganisations, and tax implications still need to be interpreted and processed correctly. In many respects, the challenge remains unchanged: transforming information into trusted action. New rails may improve efficiency, but they do not eliminate the need for high-quality data, governance, and oversight.

In one sentence, what will corporate actions look like in 2030?

Fumagalli: Automated and real time.

Cottingham: By 2030, asset servicing operations will be centred on event risk, able to tokenise mandatory events, running an eventual data consistency model for voluntary events, and still discussing how to comply with SRD III.

Wood: By 2030, the strongest corporate-actions models will be built around connected platforms that bring trusted, standardised data together at source, and automate the routine lifecycle from issuer announcement through to investor outcome. Skilled operations teams will still be essential, but focused on genuine exceptions, oversight and client service, and not on repeatedly repairing fragmented data or reconciling the same event across multiple systems.

Those platforms will need to support a more immediate and more diverse market: shorter settlement cycles, global operating models, and both traditional and tokenised assets running in parallel. The winning approach will not be separate operating models for each market or asset type, but a common, flexible foundation that unifies data and workflows while allowing the necessary market-specific controls.

There is real reason for optimism. The investment case is becoming clearer: rising volumes, costly errors, tighter client expectations, and regulatory pressure make the cost of standing

still harder to defend than the cost of modernisation. Investment will come not just from a search for efficiency, but from the need to protect market resilience, reduce risk, and sustain confidence in a marketplace that investors rely on.

Getting there will require a practical, coordinated approach: improve data integrity at the point of origin, use common standards and shared governance to make that data actionable, and connect it through modular platforms, embedded AI, and automated workflows. With issuers, CSDs, custodians, intermediaries, and technology providers aligned around accountability, the industry can move beyond manual handling and build the scalable, transparent infrastructure needed to support the next generation of market growth.

Baxter: By 2030, I would like to see issuer-validated structured business events published at source and digitally ingested by downstream participants through interoperable platforms, with the value created by removing the cost of repeated interpretation and rekeying shared with the issuing parties that enabled it — but as an experienced optimist, I would settle for one issuing party demonstrating what we have proposed in 'The Last Interpretation' and giving the market a reason to follow.

Hautus: By 2030, most corporate actions will run on structured data from the issuer, processed with little manual work, so that experts spend their time on the complex events and client decisions that really need judgement.

Thursfield: By 2030, corporate actions will be more standardised, connected, and automated, with AI helping people make faster and better-informed decisions while scale providers continue to provide the governance, controls, and accountability clients need to navigate an increasingly complex global market. Above all, we will still have great people with deep expertise and client focus. No matter how much the tools or technologies help us change and advance, we know our clients value support, expertise and service and we look forward to supporting clients. 2026 is CIBC Mellon's 30th anniversary, and we want to be their provider not just to 2030 but for the next 30 years and beyond.

Gupta: By 2030, the biggest change may be the move from processing corporate actions to orchestrating them. Tokenisation could make parts of the asset lifecycle more programmable, while AI automates interpretation and validation. The real challenge will be connecting traditional and digital markets so that the same event can be understood, reconciled, and acted upon consistently across both. ■