EUROPEAN PAYMENTS COUNCIL
Towards our Single Payment Area

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Guide to the Adherence Process for the SEPA Credit Transfer Scheme

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0 DOCUMENT INFORMATION

0.1 References

This section lists documents referred to in the Guide. The convention used throughout is to provide the reference number only, in square brackets. Use of square brackets throughout is exclusively for this purpose.

	Document Number	Title	Issued by:
[1]	EPC125-05	SEPA Credit Transfer Scheme Rulebook	EPC
[2]	EPC027-07	Scheme Management Internal Rules	EPC
[3]	Letter EPC050-07	Open letter to banks planning to adhere to the SEPA Credit Transfer and SEPA Direct Debit Schemes, dated 31 May 2007	EPC

0.2 Change History

Issue number	Dated	Reason for revision
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1 INTRODUCTION

1.1 Purpose of the document

This document provides detailed guidance on the adherence process for the SEPA Credit Transfer Scheme (the "Scheme"). In particular, it is directed at institutions looking to join the Scheme ("Proposed Participants"), agents of Proposed Participants, and National Adherence Support Organisations ("NASOs") with a view to providing these groups with a step-by-step guide on the process established by EPC for adhering to the Scheme.

The objectives of this document are to:

1. Specify which documents must be submitted as part of the adherence process
2. Provide guidance on completing the adherence documentation
3. Define and specify the roles and responsibilities of different actors in the adherence process
4. Set out a clear timetable for the adherence process, starting from 3 September 2007
5. Provide a list of Frequently Asked Questions (FAQs)

1.2 Roles & Responsibilities

The Proposed Participant is responsible for the correct execution of its Adherence Agreement and for the accuracy of documents submitted as part of its application to adhere to the Scheme. The EPC shall be responsible for approving the applications of Proposed Participants. A NASO may facilitate the administrative process, but in so doing, a NASO does not take on any legal obligations or liabilities unless otherwise agreed between the Proposed Participant and its NASO.

1.3 Scheme Adherence Documents

The following documents comprise the Adherence Pack (the "Adherence Pack") for the Scheme:

1. The Scheme Adherence Agreement
2. Schedule to the Adherence Agreement
3. Legal Opinion

Documents contained in the Adherence Pack together form the application for adherence to the Scheme. All Proposed Participants are required to submit an Adherence Pack before they may be considered for participation in the Scheme.

A pro-forma Adherence Agreement, schedule and legal opinion are annexed to this Guide.

The following documents support the adherence process:

1. The SEPA Credit Transfer Scheme Rulebook, version 2.3 approved by the June 2007 Plenary (doc EPC125-05) (the "Rulebook")

2. The Scheme Management Internal Rules (doc EPC027-07) which form an integral part of the Rulebook (the "Internal Rules")

3. This Guide to the Adherence Process for the SEPA Credit Transfer Scheme, including FAQs (doc EPC125-07)

4. The Open Letter to all banks in SEPA (ref [3]).

All documents listed in this section are available for download from the EPC website http://www.europeanpaymentscouncil.eu.

1.4 Timeline for Scheme Adherence

Adherence Process Timeline for 2008 Readiness		
	Date and/or Month	**Action or activity**
1.	2 July 2007	ROC members nominate NASOs and their project managers. ROC members provide the EPC with estimated numbers of Proposed Participants, as represented by each NASO.
2.	08 August 2007	EPC publishes the SEPA Credit Transfer Scheme Adherence Pack on the website http://www.europeanpaymentscouncil.eu.
3.	August 2007	EPC and NASOs to conduct joint meetings (if required) to synchronise process, efforts and timelines for adherence.
4.	23 August 2007	Publication of the list of NASOs and their contact details on the EPC website.
5.	August 2007	EPC organises 1 or 2 open days (if required) for NASOs for question and answer sessions and discussions of any outstanding issues.
6.	31 August 2007	NASOs open their helpdesks.
7.	3 September 2007	NASOs are ready to receive applications from Proposed Participants.
8.	3 September 2007	EPC opens the process for applications and starts processing.
9.	October 2007	The Scheme Management Committee ("SMC") is ready to review applications based on a cycle of meeting dates to be established by the SMC.
10	2 November 2007	First publication of the SEPA Credit Transfer Register of Participants on the EPC website (the "Register").

Adherence Process Timeline for 2008 Readiness		
	Date and/or Month	**Action or activity**
11	3 December 2007	Second publication of the Register.
12	14 December 2007	Deadline for receiving application forms, in readiness for adherence to the Scheme from 28 January 2008.
13	18 December 2007	SMC status report on adherence to the Scheme reviewed by EPC Plenary
14	12 January 2008	Third publication of the Register of Participants – final version before the launch of the Scheme.
15	28 January 2008	The Scheme is launched.
16	29 January 2008	EPC Secretariat re-opens the process for applications and publishes an updated Register of Participants to take effect on the first working day of each month, starting March 2008

TABLE 1: ADHERENCE PROCESS TIMELINE FOR 28 JANUARY 2008 READINESS

1.5 The Register of Participants

The EPC will publish the Register of Participants on the EPC website which will be freely downloadable as a PDF, an XML, and a CSV file.

The Register will be published every month (in accordance with the timetable above) and will contain the names of Participants that are ready to receive and send SEPA Credit Transfer payments from the date on which the Register is published.

The Register will contain a record for each Participant and will include the following information:

1. The name of the Participant
2. Address of its registered office
3. Reference BIC

The reference BIC is a BIC 8 or BIC 11 selected by and applicable to the Participant, and used by the EPC as a means of unambiguously identifying the Participant organisation.

The Register is not an operational database and does not contain a comprehensive list of BICs used for routing payments.

The EPC shall update the Register at the end of every month, adding the names of Proposed Participants joining the Scheme. A Participant formally becomes part of the Scheme and subject to Scheme rules on the first working day of the month following the date on which its name is published in the Register. By way of example, if the EPC publishes the names of new Participants in the Register in the last week of August, the Participants become subject to Scheme rules on the first working day of September. For adherence in January 2008, the EPC will start publishing the names of Participants from November 2007, as set out in section 1.4 above. However, Participants will only commence their participation in the Scheme, and become subject to Scheme rules, on the 28 January 2008.

2 CONDITIONS FOR SCHEME ADHERENCE

Eligibility criteria for the admission to the Scheme are listed in the Scheme Rulebook (ref [1]).

Proposed Participant: Conditions to Adherence	
Conditions	**Description of the Conditions**
Condition 1: Your bank must satisfy all eligibility requirements.	In order to be eligible as a Participant, a Proposed Participant must at all times comply with Chapter 5.4 of the Rulebook and section 2.2.5 of the Internal Rules.
Condition 2: Your bank must have a valid BIC 8 or BIC 11.	The reference BIC is a BIC 8 or BIC 11 selected by and applicable to the Participant, and used by the EPC as a means of identifying unambiguously the Participant organisation. It is not a routing BIC. If your bank currently has no valid BIC, it will not be possible to adhere to the Scheme. To obtain a valid BIC, contact SWIFT immediately. This process takes approximately 1 month. It is expected that all Participants will take steps to ensure that all their operational BICs are made available to relevant database providers.
Condition 3: Your bank must be actively preparing to be reachable and be able to process SEPA credit transfer payments from 28 January 2008.	If this is not the case, do not submit an Adherence Pack in 2007. Rather, wait until you are ready and then submit your Adherence Pack.

TABLE 2: PROPOSED PARTICIPANT: CONDITIONS TO ADHERENCE

3 ADHERENCE PROCESS

The adherence process is designed to be efficient and convenient. Accordingly, a bank may apply to adhere on its own. Alternatively, a bank may wish to apply alongside other subsidiary or affiliated entities in its corporate group that are also applying to join the Scheme. For banks that are applying with other entities in their corporate group and specifically for banks that are applying with 4 or more adhering subsidiary or affiliated entities located in different SEPA jurisdictions, the EPC allows a direct submission process, whereby the Adherence Packs in respect of the group Proposed Participants may be submitted directly to the EPC, without the intervention of a NASO.

For determining whether a bank qualifies under this exception, references to a subsidiary adhering to the Scheme may be read as including subsidiaries of subsidiaries as well as any affiliated entities within the corporate group. All references to subsidiaries in this Guide are to be read as references to subsidiaries or affiliated entities that are looking to join the Scheme.

A Proposed Participant will fall into one of the following two categories:

1. A bank with three or fewer subsidiaries (including banks with no subsidiaries), or banks with four or more subsidiaries located in a single SEPA jurisdiction

2. A bank with four or more subsidiaries which are located in different SEPA jurisdictions

3.1 Category 1 – Bank with three or fewer subsidiaries (including banks with no subsidiaries) or banks with four or more subsidiaries located in a single SEPA jurisdiction

In Category 1, Proposed Participants will apply to join the Scheme using one of the following two flows:

- Flow 1 - a Proposed Participant prepares and submits its Adherence Pack to a chosen NASO. The NASO checks the Adherence Pack and sends it to the EPC for processing.
- Flow 2 - a Proposed Participant nominates an agent, or itself acts as an agent (for further details on the role of the agent, see Section 5 below). The agent prepares and submits the Adherence Pack to a chosen NASO. The NASO checks the Adherence Pack and sends it to the EPC for processing.

Flow 2 must be used by a group of banks applying together, by a Proposed Participant that is applying on behalf of itself and fewer than 3 of its subsidiaries, or by a Proposed Participant that is applying on behalf of itself and four or more subsidiaries located in one single SEPA jurisdiction. A Proposed Participant may use the NASO of any of the adhering entities on whose behalf or alongside which it is signing.

3.2 Category 2 – Bank with Four or More Subsidiaries in different SEPA Jurisdictions

In Category 2, a Proposed Participant will apply to join the Scheme using one of the following three flows:

- Flow 1 - a Proposed Participant prepares and submits the Adherence Pack to a chosen NASO. The NASO checks the Adherence Pack and sends it to the EPC for processing.
- Flow 2 - a Proposed Participant nominates an agent (the agent is an entity outside of the Proposed Participant's corporate group structure). The agent prepares and submits its Adherence Pack to a chosen NASO. The NASO checks the Adherence Pack and sends it to the EPC for processing. A Proposed Participant may use the NASO of any of the adhering entities on whose behalf and alongside which it is signing.
- Flow 3 - a Proposed Participant prepares and submits the Adherence Pack on behalf itself and agent on behalf of all group Proposed Participants and sends it directly to the EPC for processing.

4 COMPLETING THE ADHERENCE PACK

Under the Internal Rules, a Proposed Participant may complete the Adherence Pack using one of the following two methods:

- Method 1: a Proposed Participant completes its own Adherence Pack
- Method 2: a Proposed Participant gives legal authority to an agent to complete the Adherence Pack

After selecting one of the above methods, a Proposed Participant (or an agent) needs to provide its NASO (and thereby also the EPC) with the following three documents:

- Scheme Adherence Agreement
- Schedule to the Scheme Adherence Agreement
- Legal Opinion

The documents are annexed to this document; they can also be downloaded from www.europeanpaymentscouncil.eu.

The SMC reserves the right to request additional supporting documents from a Participant (or its agent) in exceptional circumstances.

4.1 Method 1: Proposed Participant completes its own Adherence Pack

Where a Proposed Participant downloads the Adherence Pack from the EPC website and completes it on his own behalf, it must read through the Adherence Pack, correctly execute the Adherence Agreement (with schedule) and complete the pro forma legal opinion.

For Method 1 a Proposed Participant needs to prepare and submit the following documentation:

- Adherence Agreement
- Schedule to the Adherence Agreement
- Legal Opinion

4.2 Method 2: An Authorised Agent completes the Adherence Agreement

The EPC recognises that it may be easier for a Proposed Participant to undertake the adherence process through an agent instead of completing the form by itself. A Proposed Participant may authorise an agent to complete the Adherence Agreement on its behalf. In addition, an agent may act on behalf of several Proposed Participants at the same time, thereby potentially speeding up the adherence process.

If a Proposed Participant wishes to use an agent for completing the Adherence Agreement, it must give this agent binding legal authority to act on its behalf. If the Proposed Participant is in any doubt as to whether it has done this correctly, it must consult its own internal or external legal counsel for advice. The Proposed Participant will also be required to supply the agent with sufficient information enabling it to complete the schedule to the Adherence Agreement.

An agent will be responsible and required to:

- Thoroughly read through the Adherence Pack and guidance on the EPC website
- Correctly execute the Adherence Agreement (with schedule)
- Obtain a completed pro-forma legal opinion from either the Proposed Participant's internal counsel or from external counsel. Counsel is to ensure that wording dealing with the legal authority of the agent to complete the Adherence Agreement is included in the legal opinion. This wording is in square brackets in the pro-forma legal opinion.

Where an agent is completing Adherence Packs on behalf of several Proposed Participants at any one time, it is only required to submit one legal opinion to cover all of those Proposed Participants. It is not required by the EPC to submit one legal opinion per Proposed Participant. However, where an agent is acting for Proposed Participants who are not all established in one jurisdiction, it may consider it desirable to obtain separate legal opinions relating to the laws of each jurisdiction.

An agent needs to prepare and submit the following documentation:

- Scheme Adherence Agreement
- Schedule to the Adherence Agreement – IMPORTANT: one schedule per Proposed Participant
- Legal Opinion. Only one legal opinion is required to cover a group of Proposed Participants on whose behalf an agent acts at any one time. However, where an agent is acting for Proposed Participants who are not all established in one jurisdiction, it may consider it desirable to obtain separate legal opinions relating to the laws of each jurisdiction.

An agent may complete one Adherence Agreement on behalf of each Proposed Participant; alternatively, an agent may complete one Adherence Agreement on behalf of all of the Proposed Participants on whose behalf it is acting. Where an agent wishes to complete one Adherence Agreement on behalf of all of the Proposed Participants, it must ensure that it provides a list of each of their names and a schedule completed on behalf of each Proposed Participant as an annex to the Adherence Agreement.

4.3 Instructions for Filling in the Adherence Agreement and Schedule

Steps for a Proposed Participant or agent to complete the adherence agreement and schedule		
	Description of Steps	**Participant's Action**
Step 1	Read the full Scheme Adherence Pack and in particular the Adherence Agreement.	Proposed Participants are advised to familiarise themselves with the documentation first. They are also advised to create a list of their own documentation that they need to support and/or use in the adherence process. These two steps will help Proposed Participants to: – Design the adherence work flow – Plan the time schedule – Plan the effort, budget and resource allocation – Indicate the areas where they need legal advice
Step 2	Download the Adherence Pack set out as an annex in the Rulebook and available for download from www.europeanpaymentscouncil.eu.	It is a requirement that both the Adherence Agreement and other documentation in the Adherence Pack are submitted in original hard copy format. Banks may choose to also save an electronic copy in .PDF format for their records. Hard copy documentation will take precedence over electronic copies.
Step 3	Fill in the legal name of Proposed Participant.	This should be the legal name of the entity.
Step 4	Insert the chosen 'Readiness Date.'	The Readiness Date (as defined in the PREAMBLE section of the Adherence Agreement) is a date from when the Proposed Participant declares to the EPC that it is ready to comply with its obligations under the Scheme. However, as set out in the Open Letter (ref [3]), for Proposed Participants applying to adhere in 2008, the Readiness Date refers to the date on which they are ready, as a minimum, to receive SEPA Scheme payments. Proposed Participants must ensure that on the Readiness Date, all of their branches in SEPA countries are ready to receive SEPA Scheme payments. The Adherence Agreement becomes effective between the Proposed Participant, the EPC and other Participants on a date either on or following the Readiness Date (the "**Effective Date**").

Steps for a Proposed Participant or agent to complete the adherence agreement and schedule		
Step 5	To confirm the completion of the legal opinion and the schedule, tick the appropriate boxes in section 7 of the Adherence Agreement.	If there are queries on the adhering process, Proposed Participants should consult their NASO. If there are queries of a legal nature, Participants should seek professional legal advice. The EPC cannot provide legal advice. A NASO may choose, but is not obliged, to offer legal advice. The EPC shall not accept responsibility for the content or accuracy of any legal advice offered by a NASO to a Proposed Participant in these circumstances.
Step 6	Participant/agent proceeds to signature section.	Proposed Participants/their agents should fill in the following information: • Full name of the authorised person • Position of the authorised person • Date of signing the Adherence Agreement • Impress company seal (if applicable) A Proposed Participant should ensure that an authorised person(s) from its organisation signs the Adherence Agreement. An agent should ensure that it is authorised to sign on behalf of the authorised person(s) from the organisation of the Proposed Participant.

Steps for a Proposed Participant or agent to complete the adherence agreement and schedule		
Step 7	Participants are required to submit some details, as set out in the Schedule to the Adherence Agreement.	The Schedule provides general information to EPC on the Proposed Participant. It is acknowledged that the information provided in section C of this form will be publicly available, and information in section D will be kept confidential by the EPC (and the NASOs if applicable). Proposed Participants may explicitly indicate a date on which they will be ready to adhere to the Scheme (the "Readiness Date"). If such a date is not explicitly given in the Adherence Agreement, its Readiness Date will be deemed to be 28 January 2008. Where a Proposed Participant is not ready to participate from the Readiness Date given, it may delay its participation in the Scheme, as necessary. Where a Proposed Participant wishes to delay its participation in the Scheme, it must give timely notice to the EPC of not less than 15 calendar days before the Readiness Date. For legal reasons, it is very important that the Proposed Participant does NOT provide the name of any individual contact person and that the email they provide for contacts is strictly impersonal, i.e. sepa@orgname.be, info@orgname.de, etc.

Table 3: Adherence Application - Instructions for a Proposed Participant or Agent

4.4 Instructions for Completing the Legal Opinion

Each Adherence Pack includes a legal opinion which has been designed so as to be in a format that is very simple, straightforward and familiar to a legal counsel.

The purpose of the legal opinion is to give comfort to the EPC that the Proposed Participant is able to satisfy the eligibility criteria set out in section 5.4 of the Scheme Rulebook, and that it has the power and authority to become a Participant in the Scheme.

The legal opinion must be completed by either external or internal legal counsel.

There is only one legal opinion to cover applications completed by the Proposed Participant itself as well as those completed by an agent on behalf of the Proposed Participant. However, in order to ensure that the legal opinion is correctly completed, counsel must ensure that, where an agent completes an Adherence Application, the legal opinion includes a statement by counsel to confirm that the agent is properly authorised to complete the Adherence Agreement on behalf of a Proposed Participant. It is not necessary to include this statement where an Adherence Agreement is completed by a Proposed Participant on its own behalf.

5 ROLE OF AN AGENT

5.1 Who can be an Agent?

Any legal person, having received legal authority from the Proposed Participant to act and sign on its behalf, may act as agent for the Proposed Participant. Examples of entities that can act as agents include NASOs, parent companies, national banking associations or other Proposed Participants.

5.2 Role of an Agent

An agent is an intermediary that has received explicit authority from one or several Proposed Participants to arrange the completion of the Adherence Pack on their behalf.

The agent must provide the relevant NASO with an Adherence Agreement(s) and schedules duly filled in and signed for each bank that it represents. It is required to provide at least one legal opinion for all of the Proposed Participants on whose behalf it is acting at any one time. In circumstances where an agent is acting for Proposed Participants who are not all established in one jurisdiction, it may consider it desirable to obtain separate legal opinions relating to the laws of each relevant jurisdiction.

5.3 Responsibilities of an Agent

The agent has no legal responsibility in relation to the Scheme. It does not assume any of the rights and obligations arising from the adherence of the Proposed Participant. It is only obliged to the Proposed Participant to complete the Adherence Pack.

Responsibilities of an agent are covered within the appropriate provisions of Chapter 4 of this document.

More information on the role and responsibilities of an agent can be found in the Internal Rules.

6 NATIONAL ADHERENCE SUPPORT ORGANISATION ("NASO")

6.1 Role of a NASO

NASOs participate in the adherence process with a view to ensuring the effective, efficient and timely launch of the Scheme throughout SEPA.

A detailed description of the role of a NASO can be found in the Internal Rules. NASOs will be chosen by their national banking community. Any entity or person may act as a NASO provided that it is able to carry out the functions of a NASO in accordance with the Internal Rules and the provisions set out below. NASOs will provide a link between Proposed Participants and the EPC, acting as the first point of contact for Proposed Participants in SEPA matters as well as an overall facilitator in the adherence process. NASOs will establish a means through which Proposed Participants can better understand the adherence process by allowing Proposed Participants to liaise with a familiar organisation in a local environment, using a local language and customs.

The sole responsibility for approving the applications of Proposed Participants lies with the EPC. A NASO may facilitate the administrative process, but in so doing, a NASO does not take on any legal obligations or liabilities.

A list of NASOs with their contact details will be available on the EPC website, www.europeanpaymentscouncil.eu .

6.2 Tasks of a NASO

NASOs will be requested to take on the following tasks in the adherence process.

Tasks of a NASO for the Adherence Process	
Task	**Description of the Task**
Task 1: Form an 'adherence' project management team and allocate resources.	In order to efficiently carry out the functions and tasks set out below, NASOs are required to form an internal project management team. It is important that adequate resources are allocated to managing the adherence process.
Task 2: Identify the banks and report to the EPC.	Identify the banks that they represent in their community, together with an indication of when these banks are likely to submit their Adherence Packs.
Task 3: Guidance and support for adherence process.	Provide guidance on the adherence process. Provide a helpdesk for Proposed Participants on adherence issues.
Task 4: Collect the Adherence Packs.	Organise and manage the collection of Adherence Packs.

Tasks of a NASO for the Adherence Process	
Task	**Description of the Task**
Task 5: Process the Adherence Packs.	Check Adherence Packs, see below.
Task 6: Submit the Adherence Packs to the EPC.	Organise and manage the process of submitting Adherence Packs to the EPC.

Table 4: Tasks of a NASO for the Adherence Process

6.3 NASO Check of Adherence Packs

6.3.1 General Provisions

In accordance with the Internal Rules, a NASO(s) should conduct a basic preliminary review of the Adherence Packs that it receives (see section 6.3.2 for examples of the types of checks that a NASO(s) may wish to conduct) and liaise with the Proposed Participant in the event of any queries or concerns about the application, prior to forwarding the Adherence Packs to the EPC for determination. NASO(s) should ensure that all Adherence Packs, received from Proposed Participants, are sent to the EPC accompanied by a statement setting out concerns, if any, that the NASO(s) may have in respect of any application.

The final decision in respect of determining applications shall always rest with the SMC of the EPC, in accordance with the Internal Rules.

NASOs are not entitled to make any determination in respect of an application. Accordingly, when a Proposed Participant is ready to submit the Adherence Pack, NASOs must not approve or reject the application of a Proposed Participant. NASOs must send all Adherence Packs to the EPC Secretariat, with any comments or concerns that they may have in respect of an application, as set out above.

NASOs are subject to a duty of confidentiality in respect of information contained in Adherence Packs received by them in the course of the adherence process. NASOs are not permitted to discuss details contained in the Adherence Packs received by them with persons other than the EPC (or the relevant Proposed Participant itself) without the prior written consent of the Proposed Participant concerned.

6.3.2 Check Procedure

As part of the adherence process, a NASO(s) should conduct a preliminary check of each Adherence Pack that it receives. Examples of checks that a NASO may conduct are set out in the table below. The examples below are suggestions only and a NASO(s) may conduct such checks as it considers appropriate to facilitate the adherence process for the EPC.

NASO Checks of the Adherence Pack	
Check	**Description of the Check**
Check 1 (form and procedure check)**:** Execution of the Adherence Pack.	Check that the Adherence Agreement, schedule and legal opinion are correctly executed: • All forms are filled in • All required information (field) is filled in • Signatures are present.
Check 2 (internal rules check)**:** Proposed Participant's eligibility for the Scheme.	Check that the Proposed Participant appears to be eligible for the Scheme in accordance with the legal opinion and Rulebook: • Check eligibility according to the legal opinion, i.e. the legal opinion has been properly completed by internal or external counsel. The NASO should check any qualifications supplied by counsel here and indicate to the EPC if it has concerns in respect of any such qualifications. • Check eligibility according to the Rulebook.
Check 3 (information check)**:** Proposed Participant's information check.	Check that the details provided by the Proposed Participant in the Adherence Agreement and schedule are consistent with any information already held by the NASO or any other central fiduciary organisations on the Proposed Participant: • Check that the authorisations of the Proposed Participant are consistent with eligibility criteria set out in the Scheme Rulebook.

Table 5: NASO Checks of the Adherence Pack

7 SMC AND EPC SECRETARIAT

7.1 Role of the Scheme Management Committee

The role of the SMC in relation to scheme management is set out in detail in the Internal Rules.

As part of its responsibilities under the Internal Rules, the SMC shall be responsible for carrying out the adherence function in respect of the Scheme.

Accordingly, the SMC shall be responsible for determining whether a Proposed Participant is eligible for joining the Scheme in accordance with the criteria set out in chapter 5.4 of the Rulebook. The SMC shall review an Adherence Pack submitted by a Proposed Participant, together with any statements provided by NASOs, in making its decision in respect of a Proposed Participant.

Where the SMC rejects an application, it will provide a letter to the Proposed Participant setting out its reasons for rejecting an application. The Proposed Participant may appeal the decision of the SMC. A Proposed Participant should consult the Internal Rules for further information on making an appeal in these circumstances.

7.2 Role of the EPC Secretariat

The EPC Secretariat provides secretarial and administrative support to the SMC. The major responsibilities of the EPC Secretariat include:

- Collating the adherence documentation received in respect of each Proposed Participant and preparing lists of Proposed Participants for review and approval by the SMC;
- Managing data in respect of the Adherence Packs received and archiving files;
- Maintaining the EPC Register of Participants;
- Liaising with NASOs and Proposed Participants (where necessary) to facilitate the adherence process; and
- Producing the Register of Participants and publishing it on the EPC website.

The EPC Secretariat has its own internal procedure for processing the Adherence Packs; this process is not set out in this document.

8 DETAILED FLOW FOR PROCESSING OF ADHERENCE PACKS (ALL ACTORS)

	Actions of NASO(s), SMC and the EPC Secretariat in the Adherence Process
1.	A Proposed Participant or its agent prepares and sends the Adherence Pack either directly to the EPC if the Proposed Participant is a bank with 4 or more subsidiaries in different SEPA jurisdictions, otherwise to the appropriate NASO.
2.	NASOs collects and checks Adherence Packs. NASO should retain a copy of each Adherence Pack for its records.
3.	NASOs are required to submit the original Adherence Pack to the EPC, along with any statement setting out their concerns in respect of the application. Every Friday, NASOs send all original Adherence Packs received and checked by them to the EPC.
4.	NASOs send an e-mail every Friday with an Excel file containing details of all Adherence Packs sent to the EPC Secretariat in hard copy.
5.	The EPC Secretariat receives the Adherence Packs from NASO(s) (or directly from Proposed Participants that are banks with 4 or more subsidiaries in different SEPA jurisdictions).
6.	EPC Secretariat confirms receipt to NASO of hard copy Adherence Packs received (EPC Secretariat to cross-reference hard copy set of Adherence Packs against details provided in the Excel file).
7.	EPC Secretariat registers the Adherence Pack with number and date.
8.	Once the Adherence Pack is received, the EPC Secretariat confirms to the Proposed Participant within 10 days that the Adherence Pack has been received and is being processed. This email is an automated confirmation sent to the Proposed Participant once its file has been encoded in the database. The e-mail will contain a username and password to enable the Proposed Participant to log into the EPC Register of Participants on the EPC web site. The Proposed Participant will have access only to the details of its own application. They will have a read-only authorisation level and must check their record and only revert to the EPC Secretariat if there is an error in the database. The Proposed Participant will only be able to view (not edit) their own record.
9.	If the information is incorrectly recorded in the EPC Register of Participants, a Proposed Participant can access a link through the site and fill in an automatic web-form which is sent to the EPC Secretariat.
10.	EPC Secretariat changes the information in the Register in accordance with the instructions of the Participant. EPC Secretariat has the right to contact the Proposed Participant in case the changes provided are unclear.

	Actions of NASO(s), SMC and the EPC Secretariat in the Adherence Process
11.	EPC Secretariat and the SMC process the application within 60 days. If approved, the Proposed Participant is notified. All approved applications will be logged into the Register for the next publication date following the date of approval and in accordance with but not earlier than the Readiness Date supplied by the Proposed Participant. Note: With reference to the timetable in Section 1.4 above, all adherence applications received by the 14 December 2007 limit will be processed by 12 January 2008
12.	If the application is rejected, the EPC Secretariat sends a letter of explanation to the Proposed Participant.
13.	EPC provides regular updates to all NASO on the status of the applications that they have sent.
14.	EPC Secretariat updates the information on the EPC Register of Participants (to be completed).
15.	EPC Secretariat publishes the Register of Participants, in CSV and PDF formats.

Note: whenever original Adherence Packs are to be sent from either NASOs to the EPC, or from Proposed Participants to the EPC, this must be done by secure means (e.g. courier, registered mail).

Table 6: Detailed Flow for Processing of Adherence Packs (All Actors)

ANNEX A: ADHERENCE PACK

This chapter contains templates for the documents that collectively make up the Adherence Pack. These are as follows:

1. Scheme Adherence Agreement
2. Schedule to the Adherence Agreement
3. Pro-forma legal opinion for a Participant

In addition, there is a section devoted to "FAQs"

EUROPEAN PAYMENTS COUNCIL
Towards our Single Payment Area

A-1 SEPA Credit Transfer Adherence Agreement

To: The European Payments Council (the "**EPC**")

From: Name of Proposed Participant[s]*:

[As set out in the list annexed to this Adherence Agreement]*

([each]* a "**Proposed Participant**")

*Please include the text in square brackets if this Adherence Agreement covers more than one entity.

PREAMBLE

(A) The SEPA Credit Transfer Scheme (the "**Scheme**") is a pan-European Credit Transfer Scheme that operates in all SEPA countries, comprising the EU member states, the three additional member states of the European Economic Area (the EEA), and Switzerland.

(B) The EPC oversees the operation of the Scheme in accordance with the terms and conditions set out in the SEPA Credit Transfer Scheme Rulebook (the "**Rulebook**").

(C) The Rulebook sets out the rights and obligations of all institutions bound by its terms (the "**Participants**"), and the EPC Plenary and binds each Participant to comply with their obligations to the EPC and to all other Participants pursuant to the rules set out therein.

(D) The EPC, acting on its behalf and on behalf of all Participants, will notify the Proposed Participant of the date following the Readiness Date (as defined below) on which this Adherence Agreement becomes effective (the "**Effective Date**") as between the Proposed Participant, the EPC and other Participants.

(E) As of the Effective Date the Proposed Participant shall become a Participant and be bound to all the obligations, and entitled to all the benefits, set out in the Rulebook.

IT IS HEREBY AGREED AS FOLLOWS:

1. The Proposed Participant hereby undertakes to all Participants and to the EPC to perform the obligations imposed by and to comply with the provisions of the Rulebook, as modified from time to time, with effect from the Effective Date.

2. The Proposed Participant makes the following representations and warranties:

2.1 The Proposed Participant has the power and authority to enter into and has taken all corporate action to authorise its entry into the Scheme and to perform the obligations and comply with the provisions of the Rulebook.

2.2 The signatories of the Proposed Participant [and the agent signing on behalf of the Proposed Participant] have all necessary corporate authorisations and the power and authority to bind the Proposed Participant to the Rulebook.

2.3 The Proposed Participant shall ensure that it satisfies and will at all times during its participation in the Scheme satisfy the eligibility criteria for participation in the Scheme as set out in the Rulebook. If at any time, the Proposed Participant has reason to believe that it no longer satisfies such criteria, or may be unable to satisfy such criteria, it shall notify the EPC immediately of the circumstances.

2.4 The Proposed Participant will be in a position to comply with all of the obligations set out in the Rulebook by [insert date] (the "**Readiness Date**").

3. By submitting this completed form of Adherence Agreement the Proposed Participant agrees to be bound by the provisions of the EPC's Internal Rules governing applications for participation in the Scheme, whether or not it becomes a Participant.

4. Any communication, including service of process, to be made with the Proposed Participant under or in connection with the Rulebook shall be made in writing and addressed to the Proposed Participant at the address set out above.

5. The Proposed Participant consents to the publication of its name and basic details of its adherence application on the public website of the EPC.

6. This Agreement is governed by Belgian law.

7. This Agreement is supported by the following information (please check boxes as applicable).

☐ Internal or external legal counsel's opinion on capacity and authority in the form prescribed by the EPC.

☐ Responses to questions set out in the schedule to this Adherence Agreement.

FOR AND ON BEHALF OF THE PROPOSED PARTICIPANT

Signed by (1)	By (2) (if necessary)
---	---
Name/Position ----------	Name/Position ----------
Date of signature ----------	Date of signature ----------
Seal: (if necessary)	

A-2 SCHEDULE[1]

(A) The Proposed Participant must supply the information requested in this schedule in support of its application to adhere to the Scheme. A failure to supply this information may result in a rejection of the application or a delay in processing it.

(B) The information supplied below shall be recorded on the EPC's Register of Participants for the Scheme.

(C) The Proposed Participant understands that any information supplied in response to questions in this section (C) shall publicly available on the public website of the EPC and may be made generally available for download by the EPC.

Full Name of Proposed Participant	
Official Address for Notices	
BIC Code (BIC 8 or BIC 11)	

(D) The Proposed Participant understands that any information supplied in response to questions in this section (D) shall be available only to the EPC or to any National Adherence Support Organisation ("**NASO**") that has been chosen by the Proposed Participant to assist in the completion of this application, as specified in section (F), and will not be disclosed to any other body.

Details of Contact Point (for communication with the EPC, a generic email must be supplied here, e.g. sepa@bank.com. Contact details of individuals must NOT be supplied).	
Readiness Date[2]	[28 January 2008] or [*Proposed Participant to provide an alternative future date for adherence*]

(E) The Proposed Participation nominates the following NASO(s) to have access to information supplied under section (D) of this schedule (if applicable):

Full Name of NASO(s)	

[1] Where more than one Proposed Participant is covered by this Adherence Agreement, please ensure that information requested by this schedule is supplied in respect of each Proposed Participant and annexed to this Adherence Agreement alongside the full list of Proposed Participants covered by this Adherence Agreement.

[2] For a Proposed Participant adhering in 2008, the Readiness Date is to be construed as being the date on which the Proposed Participant (including all of its branches in SEPA countries) is , as a minimum, ready to receive SEPA Credit Transfers in accordance with the Rulebook.

EUROPEAN PAYMENTS COUNCIL
Towards our Single Payment Area

A-3 Pro-forma Legal Opinion for proposed Participants for adherence to SEPA Scheme

LEGAL OPINION OF COUNSEL FOR ADHERENCE TO SEPA SCHEMES

[Date]

To:

European Payments Council ("**EPC**")
Av. de Tervueren 12
1040 Brussels
Belgium

Dear Sirs,

[Name of entity applying for adherence] (the "**Applicant**")

I/We act as legal counsel to the Applicant in connection with its application to become a participant in the SEPA Credit Transfer Scheme (the "**Scheme**").

All capitalised terms used and not otherwise defined in this opinion shall have the meanings ascribed to such terms in the SEPA Credit Transfer Scheme Rulebook (the "**Rulebook**").

This opinion is given in respect of the laws of [insert local jurisdiction].

ASSUMPTIONS

1. We have assumed that the Adherence Agreement and the Rulebook (including the Scheme Management Internal Rules) are legal, valid, binding and enforceable under Belgian law.

[*insert any other assumptions as to factual, but not legal, matters relied on*]

OPINIONS

Based on the foregoing, it is my/our opinion that:

1. The Applicant[s] [is/are] [a credit institution which is authorised in accordance with Article 6 of Directive 2006/48/EC by a state which is a member of the European Economic Area] [an undertaking which is listed in Article 2 of Directive 2006/48/EC] [a bank which is authorised in accordance with Article 3 of the Federal Law on Banks and Savings Banks of 8 November 1934 by the Swiss Federal Banking Commission, and Swiss Post, the post office giro institution of Switzerland, as defined in the Swiss Federal Post Office Organisation Act of 30 April 1997].

2. The Applicant[s] [has/have] the power and authority to enter into, deliver and perform its obligations under the Rulebook and the Adherence Agreement and all necessary corporate and other action has been taken to enable it validly to enter into the Adherence Agreement.

3. The Adherence Agreement has been validly executed by the Applicant[s] and the Rulebook and the Adherence Agreement constitute legal, valid and binding obligations of [each of] the Applicant[s], enforceable against the Applicant[s] in accordance with their terms.

4. Under the laws of [insert local jurisdiction] in force to date, [there are no] [all] requirements to procure consents, authorisations, approvals of, or filing with any governmental authority or any regulatory authority in connection with the Applicant's application to adhere to the Scheme [have been satisfied].

5. [We note that the Adherence Agreement has been executed by an agent (the "Agent") on behalf of the Applicant[s]. We can confirm that the Agent has the legal authority to execute the Adherence Agreement on behalf of [each of] the Applicant[s]]

QUALIFICATIONS

[*insert qualifications, if any*]

This opinion is addressed to the EPC and may be relied upon by the EPC and its legal advisers only.

Signed

EUROPEAN PAYMENTS COUNCIL
Towards our Single Payment Area

A-4 Frequently Asked Questions

Re: SEPA Scheme Adherence Process

Introduction

This document sets out a list of responses to common questions that may arise for Proposed Participants in the course of their application process for adherence to the SEPA Credit Transfer Scheme. These responses are based on information set out in the Guide to Adherence Process for the Credit Transfer Scheme. If a Proposed Participant is unable to find a response to a particular question or if a more detailed response is sought, the Proposed Participant should consult any available EPC documentation and its NASO at first instance.

The Adherence Process

1.	What will be the process for adherence and what information must be supplied?	The process for adherence is set out in the Scheme Management Internal Rules which form an integral part of the Rulebook. The required information is set out in the Adherence Agreement which is contained in an Annex to the Rulebook.
2.	If my organisation is admitted to the Scheme, will my, and all other, adherence registrations be made public?	The EPC will maintain a Register of Participants for the SEPA Credit Transfer Scheme and the Register will be published on the EPC website. Selected information in the Register may be downloaded and published by others, for non-commercial purposes. The information that will be held in the public domain is the following: • name of Participant • official address for service of notices • reference BIC Information held on the Register that will not be disclosed to the public is the following: • contact point • Readiness Date (i.e. the date given by the Participant as being the date after which it is operationally ready to participate in SEPA).

3.	Can my organisation submit an application to become a Participant now but only become subject to Scheme obligations on a date in the future when we are operationally ready for SEPA?	Yes. That is possible because each Proposed Participant will be required to state a Readiness Date in the schedule to the Adherence Agreement. The adherence of a Participant will only become effective on a date following the Readiness Date, so that it will become subject to Scheme obligations on a date that is either on or after its Readiness Date. For adherence in 2008, the Readiness Date shall be construed to mean the date on which Proposed Participants (including all of their branches in SEPA countries) are ready, as a minimum, to receive SEPA Credit Transfers in accordance with the Rulebook. As set out in the Open Letter (ref [3]), banks that may not be ready to originate SEPA Credit Transfers on the launch date for the Scheme, are permitted to develop this capability in the course of 2008. In addition, banks, that may not have sending capability in all of their SEPA branches, may nevertheless adhere to the Scheme provided that all branches are able to, as a minimum, receive SEPA Credit Transfer payments. The maximum period for the EPC to process a completed Adherence Pack is 60 calendar days, irrespective of the requested Readiness Date.
4.	How can my organisation declare to the EPC that it is ready for SEPA operationally?	An organisation can show that it is ready operationally through declarations to its community as set out in the SEPA Testing Framework. In addition, a Proposed Participant must supply a Readiness Date in the schedule to the Adherence Agreement (see response to Question 3). By declaring a date for adherence to and registration in the Scheme, the Scheme Participant is assumed to be and must have taken steps to be operationally ready.

5.	If my organisation submits an Adherence Agreement and before or on becoming a Participant, is unable to become operationally ready for the Scheme, what steps can my organisation take to either withdraw the application or to request another date for becoming ready for the Scheme? How will other Participants know that my organisation has requested another date for participation or withdrawn the application?	Under the answer to Question 3 above, arrangements for providing a future date for registration are explained. An adhering institution may postpone such a date, as necessary, subject to the EPC receiving notice of such a postponement at least 15 calendar days in advance of the originally specified date. Until the date of effective adherence, the adhering institution will not appear in the Register.
6.	When my organisation submits an Adherence Agreement, what data will it have to provide and how will this data be stored?	This is set out in the Rulebook. In short:- • Adherence Agreement • schedule to Adherence Agreement • legal opinion, completed in accordance with the pro-forma legal opinion for the Scheme, as annexed to this document and as published on the website of the EPC. The physical documents will be securely stored by EPC and a copy retained by the National Adherence Support Organisation (NASO)
7.	Once my organisation's Adherence Agreement is submitted for consideration, who will have access to the details of this application?	The data will usually be handled first by a relevant NASO as described in the Internal Rules. The data will also be accessible to the EPC Secretariat and members of the SMC.
8.	If details supplied in my organisation's Adherence Pack change after we have already submitted the Pack, is my organisation obliged to inform the EPC?	Yes.
9.	Once my organisation's Adherence Agreement is submitted for consideration, how will the EPC decide whether my organisation qualifies for participation in the Scheme?	With reference to the criteria for admission to the Scheme set out in Chapter 5.4 of the Rulebook. The SMC will formally consider applications in the light of these criteria and will be obliged to approve all applications that so comply.
10.	I understand that my organisation will be required to prepare a legal opinion. Can my organisation submit a legal opinion in a language other than English?	Yes, it may. However, if your organisation wishes to submit a legal opinion that is not in English, it must ensure that it also submits a translation of the opinion into English. It is absolutely essential that the EPC receive a fair and accurate translation of the legal opinion because it will generally be relying on the English version of the opinion in the adherence process.

11.	I understand that the Rulebook is subject to Belgian law. Will the legal opinion (and any power of attorney prepared in relation to it) also be required to be subject to Belgian law?	No, the legal opinion and power of attorney may be governed by an appropriate governing law other than Belgian law. It is expected that a power of attorney or legal opinion will generally be governed by the law of the SEPA jurisdiction where the Proposed Participant is domiciled.
12.	The legal opinion provides for assumptions to be made. In particular, the legal opinion states that it may be assumed that the Adherence Agreement and Rulebook are legal, valid, binding and enforceable under Belgian law. What is the purpose of including such an assumption?	Assumptions are, generally,matters of fact or matters outside of the scope of counsel's competence that counsel may exclude from the scope of their opinion. Counsel are not required to investigate whether the Adherence Agreement or the Rulebook are legal, valid, binding and enforceable under Belgian law, particularly as most counsel will not have expertise in matters of Belgian law. It is very important that such an assumption can be made by counsel because it allows counsel to give an opinion on whether or not, under the laws of their relevant jurisdiction, the Rulebooks and the Adherence Agreement constitute legal, valid and binding obligations on the Proposed Participant that may be enforced against the Proposed Participant (legal opinion number.3).
13.	If the EPC rejects my organisation's application, what options does my organisation have to try and become a Participant?	There will be an appeals process in the event that an application is declined. Please consult the Internal Rules for further details on this process.
14.	How much does it cost my organisation to become a Participant?	It is not planned to levy fees on Scheme Participants, although the EPC reserves the right to recover costs at a future date. This possibility is not contemplated during the early years of the Scheme being launched.
15.	If I have any additional questions while completing my adherence application, who can help?	Your NASO at the first instance and the EPC Secretariat.
16.	How do I find out who my NASO is and its contact details?	A list of NASOs will be provided on the EPC website.
17.	Does my organisation require a valid BIC in order to become a Participant?	Yes, each organisation must have at least one valid BIC in order to become a Participant. Your organisation will not be able to adhere to the Scheme if it does not have a valid BIC.

18.	If my organisation does not have a valid BIC, what is the process for obtaining one and how long does this process take?	SWIFT is the registration authority for BICs. Contact SWIFT and request a valid BIC. This process may take at least a month.
19.	Can my organisation use information in the Register of Participants as a basis for routing payment transactions?	No. The Register does not hold operational routing information.

The Adherence Agreement

20.	In my organisation, who can sign the Adherence Agreement?	The Adherence Agreement should be signed by an officer(s) with the necessary powers to sign such a binding contract. Where the agreement is to be executed by another entity such as an association or parent bank on behalf of the actual Proposed Participant, the officer of the signing entity should have the power to do so and have received the necessary authority from the Proposed Participant.
21.	If my organisation signs the Adherence Agreement, will all the branches of my organisation be covered and so subject to obligations in the Rulebook?	Yes, branches of an adhering institution located in a SEPA country will be covered by the Adherence Agreement and be subject to Scheme rules in relation to Scheme payments made or received.
22.	If yes, does this mean that all of my organisation's branches must be able to comply with the Rulebook from the time that my organisation states that it is ready to adhere to the Scheme?	Yes, from such time as branches intend to make or receive Scheme payments. It is not possible for branches located in a SEPA country to defer their participation, or opt out of the Scheme since they are deemed to form an integral part of the Proposed Participant for the purposes of the Scheme.
23.	If my organisation has branches that are located outside of SEPA, will they also have to comply with the Rulebook?	No. Such branches are not eligible to participate in the Scheme.
24.	If my organisation signs the Adherence Agreement, will all the subsidiary entities of my organisation also joining the Scheme be covered by this application?	No, such subsidiaries or affiliated institutions (i.e. any entity with a separate and distinct legal personality within your organisation) will need to execute a separate Adherence Agreement.
25.	If no, will my organisation be legally responsible if its subsidiaries participating in the Scheme do not correctly perform their obligations under the Rulebook?	No, these subsidiaries are responsible for their own acts.

26.	Is it necessary for every legal entity making payments in my organisation's group structure to adhere to the Scheme, even if its SEPA Scheme payments are "routed" through another legal entity in the group?	It is expected that all legal entities making and receiving SEPA Scheme payments will join the Scheme. It is possible for an entity in the same group to handle payments in the way described, but in such a case the signing entity is fully responsible for all the obligations set out in the relevant Rulebook on behalf of the other group entity.
27.	My organisation is a savings/co-operative bank forming part of a “de-centralised group. Can one bank sign on for all of the banks in this co-operative structure?	One bank or an association may sign on behalf of all or some of the banks in the group. In so doing it is signing only as agent and all liabilities are assumed by the adhering bank as if it had itself signed.
28.	If yes, what will each bank be required to do to permit another bank to sign up to the Scheme on its behalf and what documentation is required?	If a bank or an association signs as agent on behalf of another, the two parties must have taken the necessary legal steps to establish the necessary authority for the agency arrangement. The adherence documentation will require confirmation of these steps having been completed by way of legal opinion.
29.	I represent a national banking association. Can my organisation sign up to the Scheme on behalf of all of my association's members?	Yes, subject to the foregoing provisions
30.	If yes, what must each of my association's members be required to do to permit the national banking association to sign up to the Scheme on their behalf and what documentation is required?	See response to Question 27.
31.	If my organisation signs up to a Scheme on its behalf and on behalf of another legal entity (e.g. a subsidiary), will my organisation have any legal responsibility if this legal entity fails to comply with its obligations under the Rulebook?	No. The underlying obligations under the Scheme are the responsibility of the adhering bank only and not the agent.
32.	The Internal Rules mention NASOs. Is my organisation obliged to use a NASO?	In general, yes. Only organisations that are banks signing as an agent for 4 or more of their subsidiaries, which are located in different SEPA jurisdictions, will be permitted to send their Adherence Packs directly to the EPC. All other organisations will be obliged to first consult a NASO before submitting their application to the EPC. NASOs can answer questions on the adherence documentation as well as provide a preliminary review of the Adherence Pack before this is submitted to the EPC.

33.	My organisation wishes to consult a NASO. However, my organisation is signing an adherence agreement as an agent on behalf of subsidiaries located in various different SEPA jurisdictions. Does this mean that my organisation must consult the NASO in each of jurisdictions where a subsidiary is located?	No. Where subsidiaries are located throughout SEPA, it is not necessary to consult a NASO in each of the countries where a subsidiary is located. In such cases, your organisation need consult only one NASO in any of the countries where it has a subsidiary.
34.	My bank currently does not offer any product or service allowing customers to originate credit transfers, and we want to adhere to the SCT Scheme as a Beneficiary Bank. Are we now obliged to be an Originator Bank?	The Open Letter from the EPC, dated 31 May 2007, acknowledged that there are banks that are not active in initiating payments, in the phrase "*Other institutions falling outside this group are expected to be in a position to originate SCT transactions for their customers (assuming they conduct such business) during the course of 2008.*" The spirit of the Rulebook is that a bank active today in sending and receiving payments should do so in the Scheme, starting from 28 January 2008, but that a bank not active in originating credit transfer payments today is not suddenly obliged to do so by adhering to the Scheme, as it may adhere to the Scheme in the capacity of a Beneficiary Bank only, capable of receiving Scheme payments. Note that the role of Beneficiary Bank requires that for a credit transfer that cannot be executed for a valid reason (such as wrong account number, account closed), the Beneficiary Bank must make a 'Return', as defined in the Rulebook.

Problem Scenarios

35.	What happens if my organisation is ready for SEPA and is a Participant in the Scheme but is asked by customers to make Scheme payments to an organisation that is not yet a SEPA compliant Participant?	Such a payment cannot be executed within the Scheme and, if possible, will need to be executed through another channel.
36.	What happens if my organisation's customers wish to make Scheme payments but my organisation is not operationally ready for SEPA? Can my organisation make Scheme payments without joining the Scheme?	It will not be possible to make Scheme payments until your organisation is a Scheme Participant.
37	What happens if my organisation starts receiving Scheme payments but is not yet a participant in SEPA?	This is a commercial matter for your organisation, the sending institution and your customer. Such a situation should not arise. It demonstrates the importance of joining the Scheme in an expeditious manner, to avoid such potentially difficult situations.
38	What happens if there is no NASO established in my country when I wish to submit my Adherence Pack.	In this situation, the bank should submit its Adherence Pack directly to the EPC Secretariat.