

# Adherence Guide to the EPC SEPA RTP Scheme



European  
Payments Council

European Payments Council AISBL,  
Cours Saint-Michel 30 B-1040 Brussels  
T +32 2 733 35 33  
Enterprise N°0873.268.927  
secretariat@epc-cep.eu

EPC 085-21

Version 2.0

Date issued: 1 September 2021

Public

Approved

## Guide for Adherence to the SEPA Request-to-Pay Scheme (the “SRTP Adherence Guide”)

Abstract	The present document provides detailed guidelines as well as template application forms for Applicants wishing to join the EPC managed SEPA Request-to-Pay scheme.
Document Reference	EPC085-21
Issue	Version 2.0
Date of Issue	1 September 2021
Reason for Issue	<p>The approved Version 1.0 of the present document was issued on 4 May 2021.</p> <p>The approved Version 2.0 of the present document complements the previous version with all the information relevant to the Homologation Process with the Homologation Body selected by the EPC.</p>
Reviewed by	EPC
Produced by	EPC
Circulation	Publicly available



## Table of Contents

<b>Draft</b> .....	<b>1</b>
<b>Guide for Adherence to the SEPA Request-to-Pay Scheme (the “SRTP Adherence Guide”)</b> .....	<b>1</b>
<b>1. Preface to the SRTP Adherence Guide</b> .....	<b>4</b>
1.1 About the SEPA Request-to-Pay Scheme .....	4
1.2 The role of the EPC .....	4
<b>2. Introduction to the SRTP Adherence Guide</b> .....	<b>4</b>
2.1 Purpose of the document.....	4
2.2 The EPC Registers of Participants.....	5
2.3 Publication Date and Readiness Date .....	5
<b>3. Preparation to the Adherence Process</b> .....	<b>6</b>
3.1 Pre-Conditions to Adhere .....	6
3.2 Eligibility Preliminary Self-Assessment.....	7
3.3 Branches .....	8
3.4 Possible identifiers .....	9
3.4.1 The BIC .....	9
3.4.2 The LEI .....	9
3.4.3 Identifier issued by a SEPA country .....	9
3.5 The Homologation Process.....	9
<b>4 The Adherence Documents and Process</b> .....	<b>12</b>
4.1 The Adherence Pack – Documents to be submitted by all Applicants .....	13
4.2 Completing and submitting the Adherence Documents .....	13
4.2.1 Self-submitting Applicants .....	13
4.2.2 Agents acting on behalf of the Applicant.....	14
4.3 STEP BY STEP GUIDE - Instructions for completing the Schedule (Annex 2) and the Adherence Agreement (Annex 1).....	15
4.4 STEP BY STEP GUIDE - Instructions to the Legal Counsel for completing the Legal Opinion (Annex 3).....	17
<b>5 Application Processing by the EPC Secretariat</b> .....	<b>18</b>
5.1 Evaluation of the Application .....	18
5.2 Inclusion in the Register of Participants.....	18
5.3 Reject of an Application .....	19
5.4 Processing flow of Applications (Including All Actors) .....	19
<b>6 Scheme Participation Fees</b> .....	<b>20</b>
6.1 Invoicing .....	20
6.2 Payment of the Invoices .....	20



<b>7</b>	<b>Personal Data Protection .....</b>	<b>21</b>
7.1	Personal data collected in relation to the adherence process .....	21
7.2	Rights of data subjects .....	21
7.3	Disclosure of personal data.....	21
7.4	Personal data breach notification.....	22



## 1. Preface to the SRTP Adherence Guide

### 1.1 About the SEPA Request-to-Pay Scheme

The **SEPA Request-to-Pay Scheme** (the "**SRTP Scheme**") establishes a set of harmonised rules, practices and standards to allow RTP Service Providers ("**SPs**") located in SEPA to request a payment initiation in euro, based on the rules set out in the SEPA Request-to-Pay Scheme Rulebook (the "**SRTP Rulebook**") and the associated document such as the SEPA Request-to-Pay Scheme Implementation Guidelines (the "**IGs**"), as amended from time to time.

The SRTP Scheme is not a payment means or a payment instrument, but a way to request a payment initiation. Accordingly, the Scheme is open to both, regulated and non-regulated SPs capable of complying with the necessary technical and security requirements detailed under the SRTP Rulebook and related documents.

### 1.2 The role of the EPC

The SEPA Request-to-Pay Scheme is managed by the **European Payments Council** (the "**EPC**"), i.e., the Scheme Manager.

- The **EPC Secretariat** (the "**Secretariat**") is responsible for approving applications to join the Scheme. The decision of the Secretariat is based, amongst other, on the outcome of the Homologation Process performed by the appointed **Homologation Body**. The full process is further detailed under section 4 of the present Guide.
- The EPC body that is charged with overseeing adherence to the Scheme is the EPC Board.
- The **Dispute Resolution Committee** (the "**DRC**") is responsible for investigating complaints from applicant Scheme Participants whose application for has been rejected, as well as for managing disputes arising within the Scheme and for handling breaches of the Rulebook.
- Complaints against the Homologation Body should be addressed to the EPC as part of the Adherence Process.

Further details on the role of the Secretariat and the Request to Pay Task Force ("**RTP TF**") can be found in the section 4 of the SRTP Rulebook ("**Scheme Management**"), whereas further details on the role of the DRC can be found in the [Dispute Resolution Committee Mandate](#) (the "**DRC Mandate**").

## 2. Introduction to the SRTP Adherence Guide

### 2.1 Purpose of the document

This document (the "**SRTP Adherence Guide**") provides detailed guidance on the adherence process for the SEPA Request-to-Pay ("**SRTP**") Scheme.

It is directed at:

- institutions wishing to join the Scheme as **Scheme Participants**,
- **Agents** applying on behalf of Applicants (e.g., NASOs, parent companies of Applicant subsidiaries, etc.)

with a view to providing these entities with a step-by-step guide on the process established by the EPC for adhering to the Scheme.



The institution applying to participate in the Scheme throughout the present document is called “**Applicant**” or “**Request-to-Pay Service Provider**” (abbreviated “**RTP SP**”).

All capitalised terms used but not defined in the present document shall have the meaning attributed to them in the Rulebook.

For all questions that are not covered by the present guide, Applicants can contact the EPC Secretariat at [srtp@epc-cep.eu](mailto:srtp@epc-cep.eu)

## 2.2 The EPC Registers of Participants

The EPC keeps and publishes a Register of Participants for each SEPA Scheme (the “**Register**” or “**Registers**”) on the EPC website. The Registers are freely downloadable as a PDF, an XML, and a CSV file on the [EPC Register webpage](#).

The SRTP Register is published regularly and contains the details of Participants that are ready to send and/or receive SEPA Request-to-Pay messages.

The published SRTP Register contains a record for each Participant and include the following information:

- Name of the Participant
- Address of its registered office
- Reference identifier- a BIC8 or BIC11 selected by and applicable to the Participant, or LEI, or National Registration Number.
- Readiness Date – the date by which the Participant will be ready and able to process SEPA Request-to-Pay messages.

## 2.3 Publication Date and Readiness Date

The EPC updates the Registers regularly, by adding/removing the names of Participants joining/exiting the Scheme. This is done in a process divided by **adherence cycles**.

To this extent, the EPC maintains a [yearly Calendar](#) on its website, that Applicants shall carefully evaluate before applying.

The EPC Calendar shows the following dates for each adherence cycle:

- 1) **Adherence Receipt Deadline at EPC** – The deadline to send the application documents to the EPC Secretariat. To be considered within the deadline, by that date Applicants must send complete adherence packages, at least in their electronic formats (i.e., scanned copies of the originals), to the EPC Secretariat. Original copies of the Adherence Agreement and of the Legal Opinion shall be sent via regular mail to the EPC premises before the relevant Register Publication Date.
- 2) **Register Publication Date** – Is the date on which the updated Register is published on the EPC website. The Register is automatically published at midnight.



- 3) **Operational Readiness Date** – Is the date on which the Applicant effectively becomes a Participant to the Scheme it has adhered to (the “**Readiness Date**”), as it becomes reachable for RTP messages made under the rules of the SRTP Scheme. As of the Readiness Date the Participant is bound to all obligations and is entitled to all the benefits set out in the related Rulebook.

The EPC requires Applicants to choose a Readiness Date in the Schedule (Annex 2) to the Adherence Agreement that is one of the available Operational Readiness Dates on the EPC Calendar or a subsequent one. **Applicants can in fact choose a Readiness Date that is up to 6 months subsequent to the date of their application. This has to be duly specified to the EPC Secretariat.**

**The actual Readiness Date might be influenced/depend on the Homologation process that the Applicant will have to undergo. The Applicant should duly inform the EPC Secretariat of any change in the expected Readiness Date.**

The recommendation to all Applicants is to submit the adherence application well in advance of the Adherence receipt deadline at EPC, to avoid any risk of missing the desired adherence window.

### 3. Preparation to the Adherence Process

Applicants are advised to familiarise themselves with the Adherence Documents and the Adherence Process first. This information can be found under the section 3.4.1 (“Application process”) and Annex II (“Adherence Agreement and related documents”) of the SRTP Rulebook and Section 4 of the present Guide.

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 steps aim at helping Applicants to:

- Design the adherence workflow
- Plan the time schedule
- Plan the effort, budget and resource allocation
- Identify the areas where they need legal advice

#### 3.1 Pre-Conditions to Adhere

Applicant’s Pre-Conditions to Adhere	
Conditions	Description of the Conditions
<b>Condition #1</b>	In order to be eligible as a Participant, an Applicant must at all times comply with <b>Section 3.3</b> of the Rulebook.
<b>The Applicant must satisfy all the relevant Eligibility Criteria</b>	This compliance is equally required from a Participant at all times during its participation in the Scheme.



	Participants should at all times also comply with the relevant Participant obligations as set out in Sections 3.6 and 3.8 of the Rulebook.
<b>Condition #2</b>  <b>The Applicant must have a valid identifier</b>	<p>The following identifiers are accepted by the EPC to adequately identify an Applicant:</p> <ul style="list-style-type: none"> <li>• Business Identifier Code (BIC);</li> <li>• Legal Entity Identifier (LEI);</li> <li>• Identifiers issued by each SEPA country (e.g., enterprise number / trade register number)</li> </ul>
<b>Condition #3</b>  <b>The Applicant must be prepared/actively preparing to be reachable and be able to process SEPA RTP messages by the selected Readiness Date</b>	If this is not the case, the Applicant should not submit an Adherence Pack but rather wait until it is ready and then submit its Adherence Pack.
<b>Condition #4</b>  <b>The Applicant must obtain a Certificate of Homologation issued by the Homologation Body appointed by the EPC</b>	<p>The Applicant should obtain a Certificate of Homologation (see section 3.5) within a maximum of 6 months from the date of its application.</p> <p>Special provisions apply for subsidiary-undertakings that are part of a group (see section 3.5)</p>

Table 1: Applicant Conditions to Adhere

### 3.2 Eligibility Preliminary Self-Assessment

**The Eligibility Criteria for the admission to the Schemes are listed in the Rulebook (section 3.3) and here below.** The criteria reflect the key technical and legal requirements that must be fulfilled by all Scheme Participants to ensure the integrity and proper functioning of the Scheme.

The Secretariat will only approve an Applicant for participation in a Scheme if it can demonstrate that it satisfies the Eligibility Criteria. The information provided by an Applicant in accordance with the instructions included in the present document should enable the Secretariat to determine whether or not the Applicant is able to satisfy them.

**It is extremely important that Applicants provide accurate, up-to-date and complete information** in relation to the criteria set out in this document. If an Applicant fails to provide the necessary information, consideration of its application could be subject to delay or further investigation. Each Applicant shall determine its status as follows:



Eligibility Preliminary Self-Assessment	
Eligibility Requirements (Annex I – Trust and Security Framework (TSF) of the EPC SRTP Rulebook)	In order to successfully onboard an RTP SP as Participant in the SRTP scheme (adherence process), the EPC is generally required to check that an RTP SP: <ul style="list-style-type: none"> <li>• is a validly constituted legal entity;</li> <li>• complies with the eligibility criteria set out under Section 3.3 of the SRTP Rulebook;</li> <li>• has been successfully homologated by the appointed Homologation Body giving certainty about the technical and security capability of the applicant RTP SP to perform the activities in accordance with the SRTP Rulebook.</li> </ul>
Eligibility Criteria (Section 3.3 of the EPC SRTP Rulebook)	In order to be eligible as a Participant, a Participant must at all times: <ol style="list-style-type: none"> <li>1) fulfil the necessary identity verification requirements as part of the contractual relationship with its clients;</li> <li>2) have the capacity to build and maintain a secure and reliable technical infrastructure for the connection with the RTP eco-system in order to be able to exchange RTP messages;</li> <li>3) in case of outsourcing activities in the context of the SRTP service to third parties have in place legally binding agreements with all such third parties to ensure the correct provision of the SRTP service in accordance with the rules of the Scheme;</li> <li>4) develop and effect operational and risk control measures appropriate to the business undertaken by the Participant;</li> <li>5) follow the trust and security requirements outlined in Annex I (Trust and Security Annex);</li> <li>6) fully comply with the SRTP Risk Management Annex (RMA);</li> <li>7) fully comply with the applicable regulations in respect of data protection (i.e., GDPR or other equivalent law).</li> </ol>

Table 2: Eligibility Assessment

The assessment above is relevant to the amount of information required for each type of Applicant SP at the time of its adherence. This is set out in details under Section 4 below.

### 3.3 Branches

**For SPs based in SEPA, a non-subsidiary branch is not able to adhere separately from the legal entity of which it forms part, as a branch does not have separate legal personality.**

In such case a legal entity applies to become a Participant in the Scheme and all of its branches located in SEPA will automatically be covered by its adherence

Before sending the application, **Applicants are required to verify with their legal counsel the legal status/qualification of the relevant institution.**





### 3.4 Possible identifiers

#### 3.4.1 The BIC

The Register lists adhering SPs with, among other identifiers, their individual BIC8 or BIC11. **It does not list branches** of SPs in SEPA as branches of a Participant are considered covered by the BIC8 of the head office.

The Participant Register **does not constitute an operational database** and does not contain a comprehensive list of BICs used for routing payments. The Participant Register is not designed for routing SRTP messages. In the Participant Registers, BIC 8 or BIC11 are used by EPC solely as a means of identifying unambiguously the Participant organisation.

Institutions adhering to more than one SEPA Scheme are requested to provide the EPC with **the same reference BIC for each Scheme**.

#### 3.4.2 The LEI

The Legal Entity Identifier (LEI) can be used as an identifier in the Participant Register. The LEI is formatted as a 20-character, alpha numeric code based on ISO standard, assigned by an issuer accredited by the Global Legal Entity Identifier Foundation (GLEIF).

#### 3.4.3 Identifier issued by a SEPA country

The Participant can also provide any valid identifier issued by a SEPA country (e.g., enterprise number / trade register number). In this case, the Participant Register will mention this identifier.

### 3.5 The Homologation Process

As detailed in the Trust and Security Framework (TSF), Annex I of the SRTP rulebook, in order to ensure that the **Applicants to the SRTP Scheme** have the required technical, operational, security and business continuity capabilities to exchange RTP messages as described in the SRTP Scheme Rulebook and the SRTP Implementation Guidelines, and can therefore send and receive messages in accordance with the scheme rules without compromising security or stability of the SRTP Scheme, they **have to undergo the SRTP Homologation Process**.

This process is outsourced by the EPC to a third party, the Homologation Body, selected by means of Request for Proposal and formally selected by the EPC Board.

Once the EPC Secretariat has validly concluded on the identity of an Applicant, on the basis of the information provided under the Schedule to the Adherence Agreement (Annex E2), the Applicant will be asked to contact the Homologation Body appointed by the EPC to proceed with the Homologation (special provisions apply for "Groupings", as will be further clarified)

Currently two types of Homologation have been identified by the appointed Homologation Body and the EPC:

- 1) Standard Homologation – For Applicants that will have to be homologated against all the below Homologation Requirements, on which the Homologation process is based upon.
- 2) Simplified Homologation – For Applicants that fulfil some of the below Homologation Requirements, on which the Homologation process is based upon (e.g., for having already gone through any relevant formal authorisation/licensing process, and/or being subject to specific relevant regulatory/supervisory requirements, etc.)



The homologation costs will be borne by the Applicants and are detailed on the Homologation Body's website (<https://www.soprasteria.com/homologation-request-to-pay>)

The following (non-exhaustive) list of requirements will be assessed by the Homologation Body:

Category	Requirement
Performance and availability	The applicant has performant and reliable technical infrastructure to connect to the SRTP eco-system and is capable of exchanging and processing fully secured SRTP messages as described in the SRTP Rulebook and the related Implementation Guidelines.
	The applicant's technical infrastructure must be able to provide a near real time service in the inter-SP space in a 24/7/365 mode.
	The applicant must have non-stop monitoring and warning mechanisms (to prepare and verify the RTP messages correctly and securely before these are further transmitted to the Payee or the Payer) together with appropriate escalation procedures to ensure that they meet the performance requirements.
Correct processing of messages	The applicant's technical infrastructure must support all messages defined in the SRTP rulebook and the related Implementation Guidelines depending on the role(s) chosen by the applicant.
	The applicant's technical infrastructure must create messages in the ISO20022 formats specified in the implementation guide and the related Implementation Guidelines (or any technical specifications that might further be approved by the EPC Board).
	The applicant's technical infrastructure must process messages received from RTP SPs, Payers and Payees in accordance with the rules defined in the rulebook.
	The applicant's technical infrastructure must validate all messages received from RTP SPs, Payers and/or Payees and reject any messages that are not formatted as defined in the rulebook and the related Implementation Guidelines (and any technical specifications that might further be approved by the EPC Board).
	The applicant, when acting as SRTP SP of the Payer, has the capability to send the data to the payer to proceed with the payment instruction.
Connections	The applicant's technical infrastructure must be able to connect to other RTP SPs, Payers and/or Payees and send and receive RTP messages.
Fraud	The applicant's current systems used to support the SRTP service adequately address fraud screening through monitoring and warning mechanisms operating in a 24/7/365 mode. Such screening must apply on both outgoing and incoming SRTP messages for existing and newly onboarded Payees, Payers and RTP SPs to detect abnormal patterns (e.g., increase in the frequency).
	The applicant has procedures in place to thoroughly perform the necessary identity verification requirements.
	An authentication is executed by the applicant when there is a communication with the Payee, the Payer and another SRTP SP.



Category	Requirement
Security	All communications between the RTP SPs, Payers and Payees must be secured, and the applicant's technical infrastructure must include the following: <ol style="list-style-type: none"> <li>1. Sealing:                             <ol style="list-style-type: none"> <li>a. Signature</li> <li>b. Encryption of transport</li> <li>c. Integrity</li> </ol> </li> <li>2. Non-repudiation: proof of sending and receiving.</li> </ol>
Testing capabilities	The applicant has reviewing and testing processes in place (based on upfront defined test cases) of the effectiveness of the monitoring and warning mechanisms on a regular basis. The applicant documents the review tests results and undertakes remedial and/or escalation actions if and as necessary.
	The applicant will ensure regular testing of the security of the offered SRTP message-channels and will undertake remedial actions if and as necessary.
	Prior to the implementation of every new update affecting an SRTP channel and/or the SRTP messages preparation, verification and/or transmission, the applicant will conduct and document all necessary tests (e.g., based on pre-defined test cases) to see if this channel functions properly to accept large volumes of SRTP messages and if all relevant procedures and systems function properly to produce, verify and/or transmit the SRTP messages as required by the Rulebook.
Educating customers (Payees and Payers)	The applicant can provide information to Payees and Payers on how to handle SRTP messages in a correct manner.
	The applicant can provide information and security recommendations to the Payees or Payers when using each specific technical channel.
Documentation	The applicant implemented documented procedures to prepare and verify the SRTP messages correctly and securely before these are further transmitted to the Payee or the Payer.
	The applicant has staff screening policies and procedures for all staff members who get in touch with (potential) Payees and/or Payers using the SRTP scheme or dealing with fraud screening.
	The applicant has up-to-date communication procedures for sending appropriate information to their customers in the event of a major incident.
	The applicant documented the authentication procedures.
	The applicant documented the enrolment/activation procedures.
Educating staff members	The applicant develops, communicates about and re-assesses the relevant policies and procedures for all staff members who get in touch with (potential) Payees and/or Payers using the SRTP scheme.
	The applicant ensures that all staff involved in fraud screening are adequately trained, and that the training material is regularly updated as necessary.
	All staff at the applicant's involved in Payee's enrolment are adequately trained.
BCP	The applicant developed, communicates about, maintains and regularly tests the Business Continuity Plan (BCP) set-up for all the systems which the SRTP processing will rely upon.



Special provisions apply to the Applicants that the EPC considers as part of a “group” (“Groupings”) as defined in the Regulation (EU) No 648/2012 on OTC derivatives, central counterparties and trade repositories (the “EMIR Regulation”) as amended from time to time, or Applicants located in a country outside the European Economic Area and within SEPA, which are part of a group meeting substantially equivalent requirements as referred to in the definition of a “group” in the EMIR Regulation.

A Grouping is considered as constituted by the parent undertaking or the central control body of the group, and its subsidiaries-undertakings. While each subsidiary-undertaking is required to adhere separately to the SRTP Scheme, if all the subsidiaries-undertakings that are part of a “group” and intend to adhere to the Scheme are affiliated to and supervised by their parent undertaking/central control body and are subject to the same business and technical processes of their parent undertaking/central control body or any other relevant entity designated by the parent undertaking/central control body, only the parent undertaking/central control body (or relevant designated entity) will be subject to the Homologation process.

Equivalent principles apply for a Grouping of non-regulated Scheme Participants, if all the subsidiaries-undertakings of said group are affiliated to and supervised by their parent undertaking/central control body and are subject to the same business and technical processes of their parent undertaking/central control body.

This is to be confirmed by each Applicant under the Adherence Agreement (Annex 1) and Legal Opinion (Annex 3) to be completed as specified under section 4 here below.

#### 4 The Adherence Documents and Process

Once the Applicant has made sure that the pre-conditions above are fulfilled and has performed a preliminary eligibility self-assessment, in order to adhere to the Scheme, it is required to proceed with the following steps (further detailed under section 5.4).

**Step 1 – Identification with the EPC:** the Applicant submits to the EPC the Schedule to the Adherence agreement (see below) completed with a valid Identifier and communicates to the EPC whether it is a subsidiary-undertaking of a group (see section 3.5 above)

**Step 2 – Homologation Process:** the Applicant is invited by the EPC Secretariat to contact the appointed Homologation Body and proceed with the Homologation Process. <sup>1</sup>

**Step 3 – Final evaluation and Adherence:** once the Applicant has received a valid Certificate of Homologation from the Homologation Body, it will provide the EPC with a complete Adherence Package (the “Adherence Pack”) duly completed and signed.

---

<sup>1</sup> Special provisions for “groups” apply as described under section 3.5



#### 4.1 The Adherence Pack – Documents to be submitted by all Applicants

The Adherence Pack, duly completed with the number of Certificate of Homologation<sup>2</sup>, is the **core set of mandatory documents** necessary to adhere and must be duly completed in all its relevant parts **by all types of eligible SPs**.

The Adherence Packs are available for download on the dedicated EPC webpage [Toolkit for New Scheme Participants](#), and contain the mandatory adherence documents, namely:

- 1) The **Adherence Agreement (Annex 1)** – This is the multilateral contract that will bind the Applicant/Participant with the EPC and each other Participant in the same Scheme;
- 2) The **Schedule** to the Adherence Agreement (**Annex 2**) – Where the Applicant is asked to provide basic details in relation to its organisation and its application;
- 3) The Legal Opinion (**Annex 3**) – To be duly completed and signed by an internal/external qualified lawyer, supporting the information provided for the adherence, including the number of the received Certificate of Homologation.

**Any application will remain valid up to 6 months from its submission**, to allow time to obtain a valid Certificate of Homologation. After 6 months, the Applicant is required confirm that all the other relevant details provided under the Schedule are still up to date and whether it still intends to become a participant in the Scheme.

Sections 4.2 and following below explain in detail how to duly complete and submit each main document of the Adherence Pack.

#### 4.2 Completing and submitting the Adherence Documents

An Applicant may complete the Adherence Pack and the Additional Documents using one of the following two methods:

**Method 1** – the Applicant completes its own Adherence Documents, or

**Method 2** – the Applicant gives legal authority to an **Agent** (e.g., the parent company) to complete the Adherence Pack on its behalf.

##### 4.2.1 Self-submitting Applicants

###### Method 1 – Applicant completes its own Adherence Pack

Where an Applicant downloads the Adherence Pack from the EPC website and completes it on its own, it must read through the Adherence Pack, correctly execute the Adherence Agreement (with Schedule) and complete the relevant pro-forma Legal Opinion.

<sup>2</sup> In case of subsidiary-undertakings, the Certificate of Homologation of the parent undertaking/central body and/or other relevant entity, as applicable.



For Method 1 an Applicant needs to prepare and submit the following documentation:

- Adherence Agreement (Annex 1);
- Schedule to the Adherence Agreement (Annex 2);
- Legal Opinion (Annex 3);
- Additional documents/information evidencing that the Applicant satisfies the eligibility criteria, if required under the present document;

Templates of the three main adherence documents for each Scheme can be found on the EPC website at the dedicated EPC webpage [Toolkit for New Scheme Participants](#)

#### 4.2.2 Agents acting on behalf of the Applicant

##### Method 2 – An Authorised Agent completes the Adherence Agreement for the Applicant

The EPC recognises that it may be easier for an Applicant to undertake the adherence process through an Agent instead of completing the form by itself. Any legal person, having received legal authority from the Applicant to act and sign on its behalf, may act as Agent for the Applicant. **Examples of entities that can act as Agents include NASOs, national banking associations or other Applicants.**

Special provisions apply for Groupings as defined under section 3.5.

If an Applicant 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 Applicant 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 Applicant 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:

- Correctly execute the Adherence Agreement (Annex 1) and Schedule (Annex 2);
- Obtain a Legal Opinion (Annex 3) from either the Applicant's internal counsel or from an external counsel. The legal counsel has to ensure a proper reflection of the legal authority of the Agent to complete the Adherence Agreement in the Legal Opinion. This wording is already provided in square brackets in the pro-forma standard Legal Opinion;
- Provide additional documents and information evidencing that the Applicant satisfies the eligibility criteria, as required under the present document.

An Agent may complete one Adherence Agreement on behalf of each Applicant or on behalf of all of the Applicants on whose behalf it is acting at the same time. Where an Agent wishes to complete one Adherence Agreement on behalf of all of the Applicants, it must ensure that it provides a list of each of their names and a Schedule completed on behalf of each Applicant<sup>3</sup> as an annex to the Adherence Agreement.

However, where an Agent is acting for Applicants who are not all established in one and the same jurisdiction, it must obtain separate Legal Opinions relating to the laws of each jurisdiction.

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 Applicant. It is only obliged to the Applicant to complete the Adherence Pack.

<sup>3</sup> If the Schedule information is provided as an excel file, only one excel file containing the Schedule information of each Applicant on whose behalf the Agent submits the adherence pack has to be completed.



Where an Agent is completing Adherence Packs at the same time in the capacity of parent company on behalf of several subsidiaries, i.e., as a “**Grouping**”, it is only required to submit one Legal Opinion, appropriately covering all the Applicants.

However, where a parent company is acting for subsidiary-undertakings that are not all established in one and the same jurisdiction, it must obtain separate Legal Opinions relating to the laws of each jurisdiction.

In case of Groupings, the parent company/central body will provide the EPC Secretariat with a list of all the subsidiary-undertakings that are part of the group.

Applicants (and Agents on behalf them) should submit the Application Documents to the EPC directly in two manners:

1. **Electronic copies of the Adherence Documents** should be sent (PDF version of the Adherence Agreement, the Schedule information and the Legal Opinion) by e-mail to the EPC at [srtp@epc-cep.eu](mailto:srtp@epc-cep.eu) .  
It is strongly recommended to provide the Schedule information in an Excel spreadsheet for which a template is available at [www.epc-cep.eu](http://www.epc-cep.eu). Applicants may, however, choose to provide the Schedule information in a Word document for which a template is available as well at [www.epc-cep.eu](http://www.epc-cep.eu). Applicants are recommended to also save an electronic copy for their own records.
2. **The original documents (mandatory)**. When original documents are sent either to Agents or to the EPC this should be done by secure means (e.g., courier or special delivery), not by regular mail. **The Applicants are required to send an original wet copy only of the Adherence Agreement.**

#### 4.3 STEP BY STEP GUIDE - Instructions for completing the Schedule (Annex 2) and the Adherence Agreement (Annex 1)

Steps for an Applicant or Agent to complete the Adherence Agreement and the Schedule		
	Description of Steps	Applicants' Action
Step 1	Read through the Adherence Guide and template Adherence Documents and in particular the Adherence Agreement.	Applicants are advised to familiarise themselves with the documentation first.
Step 2	Download the Adherence Pack from the <a href="#">Toolkit</a> .	The documents are made available in MS-Word format. There is also an Excel version available for the Schedule information.
Step 3	Schedule: Applicants are required to submit certain details, as set out in the Schedule	The Schedule provides the EPC with general information on the Applicant. The following information provided in the Schedule will be published in the relevant Participant Register: <ul style="list-style-type: none"> <li>• Name of Participant</li> </ul>



		<ul style="list-style-type: none"> <li>• Address of Participant</li> <li>• Reference BIC, or another permitted Identifier</li> <li>• Readiness Date (targeted EPC Calendar date, to be further confirmed by the applicant after receipt of the Certificate of Homologation)</li> </ul> <p>On the basis of the provided data, the EPC Secretariat will advise the Applicant to contact the appointed Homologation Body to start the Homologation Process.</p> <p>Applicants in this phase are required to indicate a planned Readiness Date, which constitutes the date on which they intend to be ready to adhere to the SRTP Scheme.</p> <p>It is strongly recommended that Applicants provide the Schedule information in an Excel file, for which a template Excel file is available for download from the EPC website. A printed version of the file must be forwarded along with the duly signed Adherence Agreement and Legal Opinion.</p> <p>The provided Readiness Date will have to be confirmed or/updated by the Applicant, after it has received a valid Certificate of Homologation issued by the selected Homologation Body. In the absence of further communication from the Applicant, the Readiness Date will be automatically updated by the EPC Secretariat with the date indicated under the Certificate of Homologation.</p>
Step 4	Sending of the Schedule	The Schedule is sent to the EPC.
Step 5	Adherence Agreement: Fill in the legal name of Applicant.	Once a Readiness Date is confirmed, the Applicant can proceed signing the Adherence Agreement.  This should be the legal name of the entity.
Step 6	Adherence Agreement: Applicant/Agent proceeds to signature section.	Applicants/their Agents should fill in the following information: <ul style="list-style-type: none"> <li>• Full name of the authorised person</li> <li>• Position of the authorised person</li> <li>• Date of signing the Adherence Agreement</li> <li>• Impress company seal (if applicable)</li> </ul> <p>An Applicant 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 Applicant.</p>
Step 7	Sending of the Adherence Agreement	The Adherence Agreement can be sent to the EPC.

Table 3: Adherence Application - Instructions for an Applicant or Agent





#### 4.4 STEP BY STEP GUIDE - Instructions to the Legal Counsel for completing the Legal Opinion (Annex 3)

Steps for a Legal Counsel to complete the Legal Opinion		
	Description of Steps	Legal Counsel's Action
Step 1	Familiarise with the standard pro-forma template enclosed under Annex 3 of the Adherence Pack.	The Legal Opinion must be completed by the Applicant's legal counsel. The Legal Opinion can be completed either by an external or by an internal legal counsel. The legal counsel shall be a qualified lawyer.
Step 2	Evaluate all the necessary elements and information required	The purpose of the Legal Opinion is: <ul style="list-style-type: none"> <li>- to give comfort to the EPC that the Applicant is able to satisfy the eligibility criteria set out in section 3.3 of the Rulebook,</li> <li>- confirm that a valid Certificate of Homologation has been obtained by the Applicant, and</li> <li>- that the Applicant has the necessary power and authority to become a Participant in the Scheme.</li> </ul>
Step 3	Assess if the Legal Opinion related to an Adherence Agreement is to be completed and signed by an Agent	The provided template wording of the Legal Opinion can cover both the Adherence Agreement executed by the Applicant itself and the Adherence Agreement executed by an Agent on behalf of the Applicant. To this extent, <b>the relevant square brackets in the text must be properly adjusted.</b>  In fact, in order to ensure that the Legal Opinion is correctly completed, in case of Adherence documents completed and sent by an Agent, the Legal Counsel must ensure that the Legal Opinion includes a proper statement, confirming that the Agent is properly authorised to complete the Adherence Agreement on behalf of the Applicant.
Step 4	Make sure that the Legal Opinion does not pre-date the Adherence Agreement and that all dates are consistent	In completing the Legal Opinion, the Legal Counsel is asked to confirm that the Adherence Agreement has been validly executed by the Applicant.  Consequently, <b>the Legal Opinion cannot pre-date the Adherence Agreement (nor the date of issuing of the Certificate of Homologation).</b> The Applicant will ensure that this is respected before submitting its Adherence Pack to the EPC Secretariat, saving time and costs.  The Legal Counsel and the Applicant will also ensure that the date of signing of the Adherence Agreement is properly reflected under the "Assumptions" of the Legal Opinion.
Step 5	Sending of the Legal Opinion – Evaluation time	The Legal Opinion can be sent directly by the Applicant or by the Legal Counsel.



Applicants are advised that a Legal Opinion which follows the pro-forma provided in Annex 3 of the Adherence Packages is usually handled rapidly, while any non-standard Legal Opinion might require longer processing.

Table 4: Adherence Application - Instructions for a Legal Counsel

## 5 Application Processing by the EPC Secretariat

### 5.1 Evaluation of the Application

The **EPC Secretariat**, overseen by the EPC Board, is **responsible for determining whether an Applicant is eligible for joining the Schemes** in accordance with the criteria set out in section 3.3 of the Rulebook.

The Secretariat shall review an Adherence Pack submitted by an Applicant, together with the provided number of Certificate of Homologation and any statements provided by Agents, in making its decision in respect of an Applicant.

In the case of a successful application, the Applicant or its Agent will receive a written notification of adherence to a Scheme.

The major responsibilities of the Secretariat include:

- Collating the adherence documentation received in respect of each Applicant and preparing lists of Applicants;
- Determining applications and informing Applicants which fail to satisfy the eligibility criteria set out in section 3.3 of the Rulebook;
- Managing data in respect of the Adherence Packs received and archiving files;
- Maintaining the EPC Registers of Participants;
- Producing the Registers of Participants and publishing the Registers on the EPC website.

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

The relevant scheme participant shall ensure that the EPC is at all times provided with up-to-date contact details in order to allow the EPC to contact the scheme participant.

### 5.2 Inclusion in the Register of Participants

**The Applicant becomes a Scheme Participant and becomes subject to the Rulebook(s) on one of the Readiness Date as published under the EPC Calendar or, where requested by the Applicant and agreed by the Secretariat, on a deferred Readiness Date (specified by the Applicant in advance to the Secretariat and provided that by that date the Applicant will have received a valid Certificate of Homologation).** The Secretariat shall send the written notification to the Applicant in case of successful application.

The Secretariat will notify an Applicant for Scheme participation if it fails to satisfy the eligibility criteria set out in section 3.3 of the Rulebook. In such case, the Secretariat may decide to request the Applicant to provide additional information, or to reject the application.



### 5.3 Reject of an Application

Where the Secretariat rejects an application, it will provide a response to the Applicant setting out its reasons for rejecting an application. The Applicant may file a complaint with the DRC for a re-consideration of its application. An Applicant should consult the DRC Mandate for further information on filing a complaint in these circumstances.

The DRC is responsible for investigating complaints from applicant Participants whose application for participation in one or more Schemes has been rejected.

The role of the DRC in relation to scheme adherence is set out in detail in the DRC Mandate.

### 5.4 Processing flow of Applications (Including All Actors)

Actions of Applicant, Agent, EPC Secretariat and DRC in the Adherence Process	
Step 1	An Applicant or its Agent prepares and sends the Schedule to the Adherence Agreement to the EPC (See Table 3)
Step 2	The EPC identifies the Applicant and advise it to contact the Homologation Body to start the Homologation Process and obtain a Certificate of Homologation
Step 3	Once the Applicant has obtained a Certificate of Homologation, it can proceed completing and signing the Adherence Pack.
Step 4	Applicants are required to submit an Adherence Pack to the EPC in two manners: <ul style="list-style-type: none"> <li>i) <b><u>Electronic copies of the Adherence Documents (Adherence Pack and Additional Documents)</u></b> should be sent (PDF version of the Adherence Agreement, the Schedule information and the Legal Opinion) by e-mail to the EPC at <a href="mailto:srtp@epc-cep.eu">srtp@epc-cep.eu</a>. It is strongly recommended to provide the Schedule information in an Excel spreadsheet for which a template is available at <a href="http://www.epc-cep.eu">www.epc-cep.eu</a>. Applicants may, however, choose to provide the Schedule information in a Word document for which a template is available as well at <a href="http://www.epc-cep.eu">www.epc-cep.eu</a>. Applicants are recommended to also save an electronic copy for their own records.</li> <li>ii) <b><u>The original documents (mandatory)</u></b>. When original Adherence Packs are sent to the EPC (European Payments Council AISBL, Cours Saint-Michel 30A, B-1040 Brussels, Belgium), this should be done by secure means (e.g., courier or special delivery), not by regular mail. <b>The Applicants are required to send original wet copies only of the Adherence Agreement (Annex 1) and of the Legal Opinion (Annex 3).</b></li> </ul>
Step 5	The EPC Secretariat receives the application and stores an electronic version of it. Then it date-stamps the Adherence Packs received from Applicants.
Step 6	Once the Adherence Pack is received, the EPC Secretariat confirms to the Applicant within 10 days that the Adherence Pack has been received and is being processed. This email is an automated confirmation sent to the Applicant once its file has been marked as received.
Step 7	The EPC Secretariat process the application and gives feedback to the Applicant if further evidence or information are needed.



	<p>In case of successful homologation and application, the Secretariat sends a written confirmation to the Applicant.</p> <p>All approved applications will be logged into the Register for the first publication date following the date of approval and in accordance with (but not earlier than) the Readiness Date supplied by the Applicant.</p>
Step 8	If the application is rejected, the EPC Secretariat sends an email or letter of explanation to the Applicant, which may decide to appeal the decision to the DRC.
Step 9	The EPC Secretariat updates the Registers of Participants.
Step 10	On Publication Date, the EPC Secretariat publishes the Registers of Participants.

Table 5: Processing Applications Flow

## 6 Scheme Participation Fees

### 6.1 Invoicing

The EPC may levy Scheme participation fees to recover the costs related to the Scheme Management function performed by the EPC.

To this end, specific invoicing related details for each Applicant are to be provided with the Schedule to the Adherence Agreement (for example **VAT number, address and contact details for invoicing**).

### 6.2 Payment of the Invoices

**The EPC aims to collect SEPA Scheme participation fees using SEPA Direct Debit Core (SDD Core) as the preferred payment instrument.**

By making use of SDD Core, the Participants' payment administration will be made easier, since the process is automated. It will also avoid missing payment deadlines, which generates reminders as well as unnecessary escalation and extra work, and could even result into being suspended from the Registers of Participants.

Participants which prefer not to make use of SDD Core may settle their SEPA Scheme participation fee invoices by SEPA Credit Transfer (SCT) or SEPA Instant Credit Transfer (SCT Inst). No other payment methods are supported by the EPC.

Applicants will be requested to indicate their preferred method of payment (SDD Core, SCT or SCT Inst) with the Schedule to the Adherence Agreement. Applicants wishing to make use of SDD Core to settle their Scheme participation fees are requested to provide the EPC with a duly completed and signed template SDD Core mandate, the template of which will be provided by the Secretariat.

More details regarding the Scheme participation fee invoicing policy and guidelines are set out in the document [EPC194-15](#)



## 7 Personal Data Protection

### 7.1 Personal data collected in relation to the adherence process

In the course of completing its adherence application, an Applicant may provide the EPC with information or documents including “personal data” (i.e., information relating to an identified or identifiable natural person, hereafter referred to as a “data subject”).

The personal data collected typically include contact details of data subjects provided by the Applicant (such as personal data relating to employees, officers, or directors of the Applicant) and are only accessible or shared on a need-to-know basis.

Applicants that submit personal data relating to a data subject to the EPC in the course of completing their adherence application must ensure that they do so in accordance with all applicable laws and regulations, including providing notice to the individual about the adherence process and, where required, obtaining appropriate consent.

The EPC may process such personal data for the purpose of ensuring the performance of the adherence agreement, the Rulebooks and/or any related document.

### 7.2 Rights of data subjects

The EPC shall, under the conditions of the applicable Belgian legislation, allow data subjects to:

- exercise their access rights and obtain the correction or deletion of their personal data
- restrict the processing of their personal data in the future
- object to the processing of their personal data on compelling legitimate grounds
- unsubscribe from any EPC publications, notably the EPC newsletter

Data subjects may exercise the above rights by sending a written request with a proof of their identity to European Payments Council AISBL, to the attention of the EPC Legal Counsel, Cours Saint-Michel 30, B-1040 Brussels, Belgium, or by e-mail to [secretariat@epc-cep.eu](mailto:secretariat@epc-cep.eu).

The relevant scheme participant shall ensure that the EPC is at all times provided with up-to-date contact details in order to allow the EPC to contact the scheme participant.

### 7.3 Disclosure of personal data

The EPC will refrain from including any personal data with the Participant’s data shared on the EPC public website.

As and when required to achieve the performance of the adherence agreement, the Rulebooks, and/or any related document, the EPC may share personal data with its processors and disclose them to third parties (i.e., professional advisers, NASO’s, or relevant supervisory authorities).

In addition, the EPC may, in exceptional circumstances, disclose personal data to third parties when:



- disclosure is required by law or regulation
- non-disclosure exposes the EPC or its staff to civil or criminal liability
- disclosure is necessary to co-operate with competent authorities
- disclosure is necessary to the relevant persons involved in any further investigation or subsequent judicial proceedings instigated as a result of an enquiry by the EPC (for example, external counsel) or following a scheme participant's complaint

The EPC will require entities acting as processors to process the personal data on behalf and under the instructions of the EPC to achieve the performance of the adherence agreement, the Rulebooks, and/or any related document.

The personal data collected by the EPC in the context of the adherence process will not be transferred to countries that do not offer a level of data protection considered as adequate under applicable EU standards.

#### **7.4 Personal data breach notification**

In case of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data that the EPC collected in the context of the adherence process, the EPC will notify the personal data breach to the relevant supervisory authority and to the individuals concerned, if and as required under the applicable Belgian legislation.