Working Group on Euro Risk-Free Rates Subgroup 2 update

Subgroup 2 Governance

Governance structure objectives

- Account for very large membership and subject complexity.
- Allocate members to subgroups based on expertise of the principle member and country or geographic area representation.
- Ensure
 - participation of all member institutions
 - flexibility
 - information sharing and
 - full transparency on work done

Coordinating committee(CoCo)

- Ensures
 - roadmap is followed,
 - deliverables are produced on time and in required quality.
- Assesses the need for
 - additional deliverables,
 - reorganizing the work plan
 - reallocating members / resources among subgroups.

Subgroup 2A (SG2A)

Lead: Erste Group

(Team leader: Neil McLeod)

Assessment of available

RFR(s)

Organigram and main objectives

Subgroup 2 (SG2)

Lead: BNP Paribas (Chair: Dominique Le Masson; Alternate: Patrick Chauvet)

Identify and recommend term structure on RFR(s)

Subgroup 2B (SG2B)

Lead: Santander (Team leader: Carlos Infesta)

Assessment of the legal and compliance implications of assessed methodologies incl. their compliance with IOSCO principles and the provisions of the EU Benchmark Regulation

Coordination Committee (CoCo)

- SG2 Chair and Alternate
- SG2A, SG2B &SG2C Team leaders
- **ECB Secretariat representative**
- **ING** representative

Subgroup 2C (SG2C)

Lead: UniCredit (Team leader: Alberto Covin)

Identification of requirements that enable a broad-based adoption of a new term-structure and working out framework proposals ensuring their implementation

methodological approaches to constructing term rates for selected

Representation of institutions in SG2A, SG2B and SG2C

	SG2	SG2A	SG2B	SG2C		SG2	SG2A	SG2B	SG2C
Credit institutions		00271	0022	0020	Asset managers	-	002,	0022	0020
Bayerische LB	х	Х			BMO Global asset management	Х			Х
BBVA	Х			Х	Cardano Risk management	Х			Х
BNP	Х	Х			Benchmark providers				
BPCE Natixis	Х	Х	Х		EMMI	Х	Х	Х	
Caixabank	Х			Х	NEX DATA	Х			Х
Crédit Agricole	Х		Х		Clearing institutions				
Dekabank	Х		Х		Eurex Clearing AG	Х			Х
Deutsche Bank	Х	Х			ICE Futures	Х	Х		
DZ Bank	Х	Х			London Stock exchange Group/ LCH	Х			Х
Erste Bank	Х	Х			User associations				
Eurobank	Х	Х			AFME	Χ		Х	
ING	Х	Х			EACT	Х			Х
Intesa	Х			Х	EFAMA	Х	Х		
JP Morgan	Х	Х			ISDA	Χ	Х	Х	
KfW Bankengruppe	Х	Х			LMA	Χ		Х	Х
LBBW	Х			Х	Other institutions				
Morgan Stanley	Х			Х	EIB	Х			Х
National Bank of Greece	Х			Х	EIOPA	Х		Х	
Norddeutsche Landesbank	Х	X			ESM	Χ	Х		
Nordea	Х			Х	Grand Total	39	18	10	16
Sabadell	Х	Х							
Santander	Х	Х	Х		Public authorities				
Société Générale	Х		Х		ECB	Χ	Х	Х	Х
Unicredit	Х			Х	European Commission	Χ	Х	X	Х
					ESMA	Х	Х	Х	Х
					Belgian FSMA	Х	Х	Х	Х

Subgroup 2A

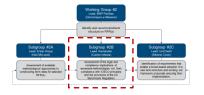
High level objectives and deliverables



Objective		Deliverables		Due Date*
(O1) Outlining the prerequisites and a roadmap for the development of both a liquid futures market and derivatives market on the new RFR	a.	Summary of all requirements for liquid Futures market including roadmap, technical features, involved institutions, operational issues	May 2018	ТВС
	b.	Summary of all requirements for liquid OIS market including roadmap, technical features, involved institutions, operational issues	May 2018	ТВС
	c.	Summary of all requirements for liquid centrally cleared derivatives market including roadmap, technical features, involved institutions	May 2018	ТВС
(O2) Identification and Proposals for alternative term structure methodologies in order to extract multiple rate fixings based on the RFR from WG1, not incorporating any credit spread methodology	a.	Backward looking index methodology (in Arrears fixing)	May 2018	Jul. 2018
	b.	Forward looking index methodology	May 2018	Sep. 2018
		 Maturity profile covered 	May 2018	Jun. 2018
		 Technical feature and data input (fixing, transaction based etc) 	May 2018	Sep. 2018
		 Calculation methodology and fallback procedures 	May 2018	Sep. 2018
		 Infrastructure necessary and institutions involved (e.g. benchmark administrator) 	May 2018	Sep. 2018
(O3) Identification and proposals for various credit/basis spread methodologies to be incorporated into the term structure methodology, considering both requirements for legacy contracts and new business	a.	Historical rate based methodologies	Jul. 2018	Dec. 2018
	b.	Current fixing/forward rate approach at single point of time methodologies	Jul. 2018	Dec. 2018
	c.	Dynamic future credit spread imbedded methodology	Jul. 2018	Dec. 2018
(O4) Analysis of basis risk	a.	Analysis of above methodologies vs Current EURIBOR	Sept. 2018	Dec. 2018
	b.	Analysis of above methodologies if different solutions are implemented by different user groups	Sept. 2018	Dec. 2018

Subgroup 2B

High level objectives and deliverables



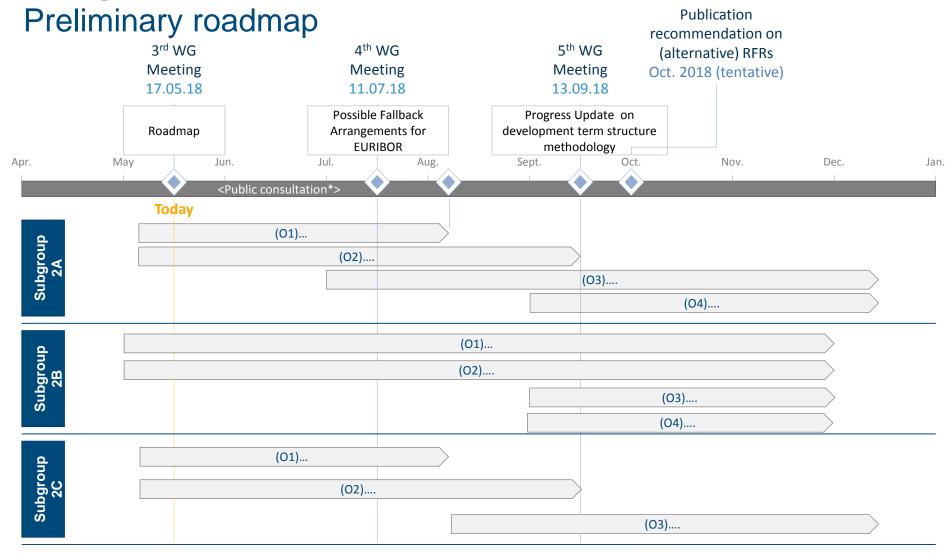
Objective	Deliverables	Start Date*	Due Date*	
(O1) Interaction with other jurisdiction: Coordinate with the works done in the US and UK on term structure	a. Establish communication channel with US and UK working groups	May 2018	Dec 2018	
	b. Initial Document comparing roadmaps	May 2018	June 2018	
	c. Updates on document	As needed		
(O2) Evaluate options of WG2A against BMR & IOSCO principles)	a. Scorecard	May 2018	Dec 2018	
	b. Evaluation proposals template	May 2018	Dec 2018	
(O3) Propose implementation options for Fallback	a. Proposal to define triggers for fallbacks	Sept 2018	Dec 2018	
	b. Evaluation of legal issues regarding fallbacks	Sept 2018	Dec 2018	
	c. Design of mechanisms that would allow market participants to efficiently incorporate the fallbacks into existing contracts that reference IBORs	Sept 2018	Dec 2018	
(O4) Communication & Education plan	 Stakeholder list (banks, corporates, AMs, retail,) and issues affecting each one. Understand different country implications 	ТВС	Dec 2018	
	b. Legal issues around communication	ТВС	Dec 2018	
	c. Contact Trade Associations, NCAs, around communication issues	TBC	Dec 2018	
	b. Prepare the implementation plan	ТВС	Dec 2018	

Subgroup 2C

High level objectives and deliverables



Objective		Deliverables	Start Date*	Due Date*
(O4) Manuin no list of	a.	A survey has been prepared and will be circulated shortly among members of all Working and Sub-groups. Outcome to be presented at July plenary session, and distributed beforehand.	May 18	Jun 18
(O1) Mapping a list of challenges/requests by market users, market infrastructures	b.	By engaging a wide range of stakeholders, deliver a list of products that might be moved to an O/N RFR, and others that most likely cannot	May 18	Jul 18
	c.	Listing critical issues that may impede the adoption of a given solution	Jun 18	Aug 18
(O2) Agree on design criteria for potential administrators and data providers	a.	In conjunction with Objective 2 of WS2A, identify the list of essential requirements that will encourage adoption by the various stakeholders (potential administrators, contributors / users, infrastructure providers) and satisfy the technical requirement of the associated derivatives.	May 18	Sep 18
O3) Implementation Plan	a.	Liaise with WS3 and WG3 in order to refine details in light of proposed instruments and methodology	Aug 18	Dec 18
	b.	How to foster broad based acceptance of the new RFR, i.e. whether it can be made compulsory (or not) and "big bang" approach (or not).	Aug 18	Dec 18
	C.	Identify possible solutions for legacy contracts . Possible P/L and MtM assessment.		
	d.	List of critical issues with existing derivatives contracts	Aug 18	Dec 18



Key issues emerging in preliminary discussions

Coordination => essential

- Internally with WS1 and SG3
 - Interconnectedness of issues addressed by SG2, WS1 and SG3
 - Need of a stronger coordination and information sharing with WS1 and SG3
- Externally with other international fora dealing with RFR term structures:
 - Central Bank Working Groups: the Sterling Working Group / BoE and the ARRC / FRBNY
 - ISDA

EONIA

 Stronger awareness of scope of transition challenges due to EONIA not being EU BMR compliant after 2019.

Timing => tight

 Mandate to work on a Euribor fallback or alternative in the absence of information about the EU BMR compliance of the new Euribor methodology

=> We need transparency, coordination, involvement and collaboration!