

Eonia / Euribor Past, Present and Future Milan, 13th June 2017

Sascha Weil Head of € Funding and Short Term Investments

Agenda

1. Euribor's dilemma

- Regulatory Challenges
- EMMIs Pre-Live Verification (PLV)
- Market Reactions
- Depth (or death?) of Interbank Money Markets
- Euribor Hybrid Model

2. EONIA's dilemma

- Panel bank decline
- Lending or borrowing where lies the truth?
- Comparison to other benchmarks



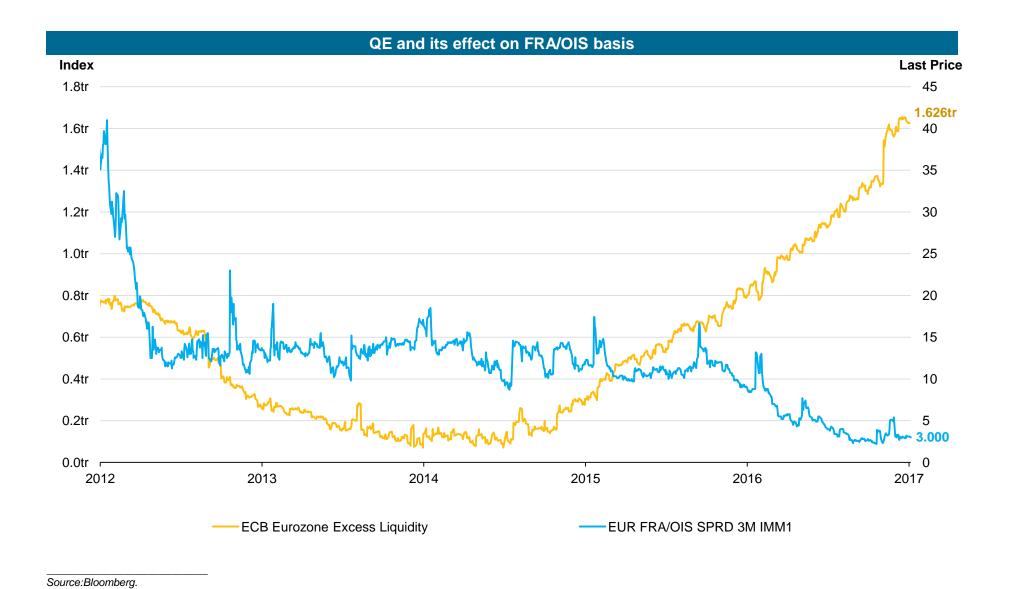
Euribor's dilemma

Background

- Departure of panel banks from 44 banks in 2012 down to 20 banks in 2017
- Definition challenge
 - Euribor® is the rate at which Euro interbank term deposits are offered by one prime bank to another prime bank within the EMU zone, and is calculated at 11:00 a.m. (CET) for spot value (T+2).
- Regulatory challenge
 - Basel III head winds
 - RWA
 - Leveraged Balance Sheet
 - LCR / NSFR
- Behavioral challenge
 - Benchmark Users: what is the downside to not participate? 'Free lunch mentality'
 - Benchmark Contributors: what is the upside to participate? Unbalanced Risk/Reward?
- Transactional / Data challenge
 - Money Market Statistical Reporting (MMSR) into PLV
 - Discounting wholesale liquidity pockets outside of banking

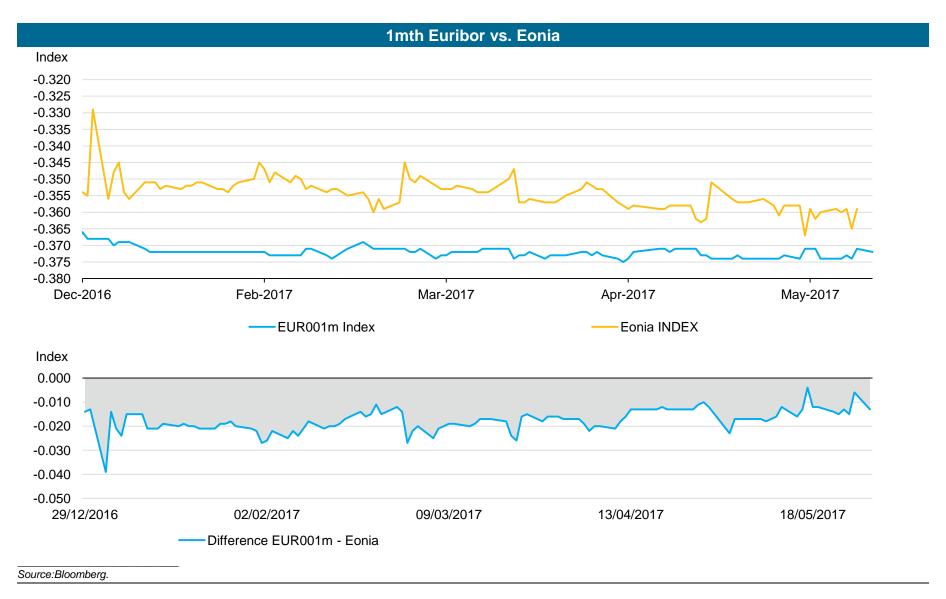


Liquidity Surplus is causing the tightening the basis Is FRA/OIS still fit for purpose as a bellwether of Interbank Markets?



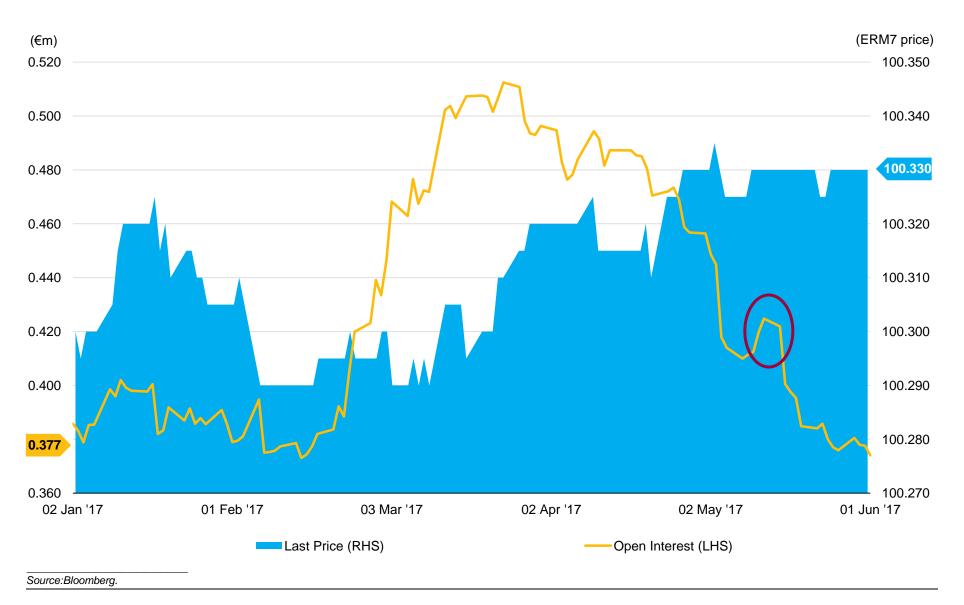


Short end FRA/OIS trades in negative terrain Is each benchmark definition fit for purpose?



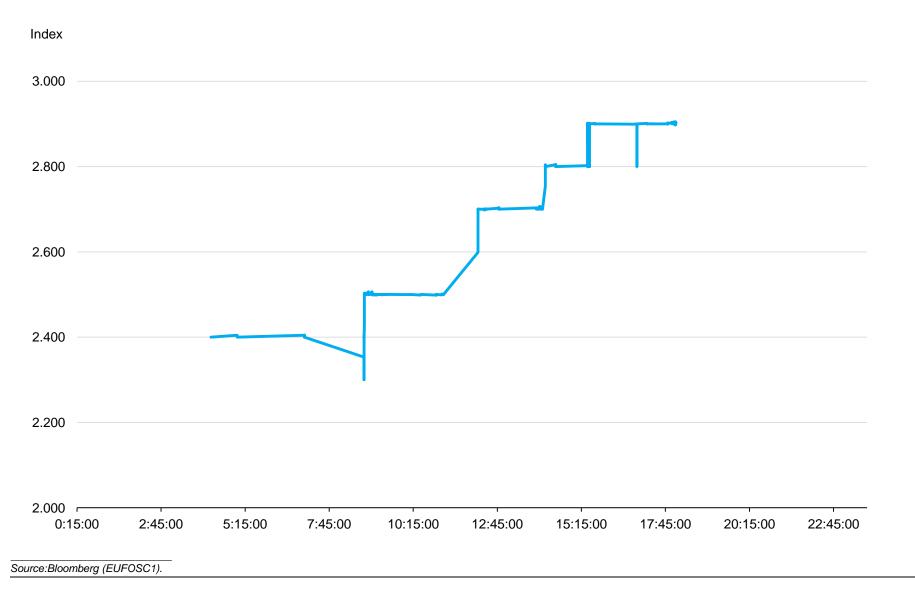


PLV Announcement on 4th May: Open interest declines Market expectation has been disappointed...?



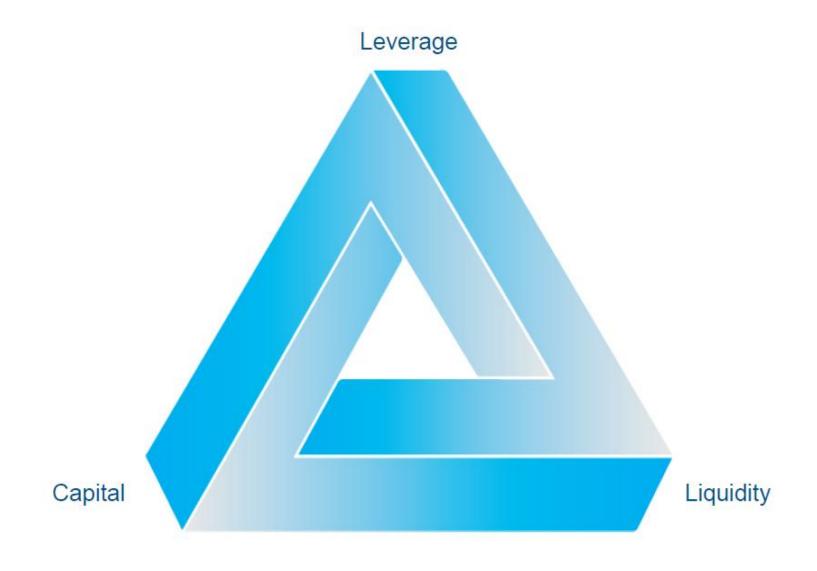


Lower Fixing expected? Euribor/OIS Price action (Intraday) June IMM on 4th May 2017





Regulatory headwinds hamper interbank funding market Is this expected to change?





Dipping your Interbank toe into a 'new' pond of liquidity ...

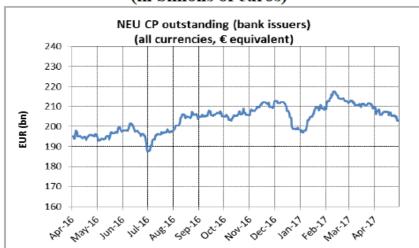
Outstandings	Over the month			2008-2017		2008-2017	
(in billions of euros)	31-Mar-17	30-Apr-17	Change	Min.	Date	Max.	Date
NEU CP	280,5	277,6	-2,9	245,3	04/07/16	547,0	27/01/09
Bank issuers	209,3	202,9	-6,4	187,7	01/07/16	465,9	22/05/09
Corporate and public issuers	66,1	69,9	3,8	35,2	22/01/10	73,7	13/04/17
Securitization vehicles	5,1	4,8	-0,3	3,0	01/10/14	42,4	19/02/08
NEU MTN	46,4	47,5	1,1	40,1	14/11/16	79,5	24/01/14
Total	326,9	325,1	-1,8	291,4	04/07/16	618,1	27/01/09

Source:https://www.banque-france.fr/sites/default/files/media/2017/04/07/highlights_cp_mtn_april_2017_gb_post_ref.pdf.

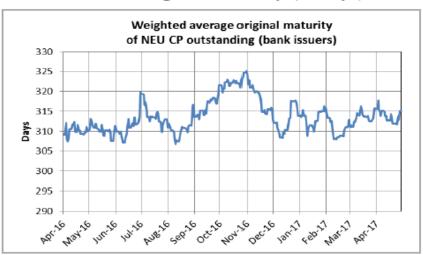


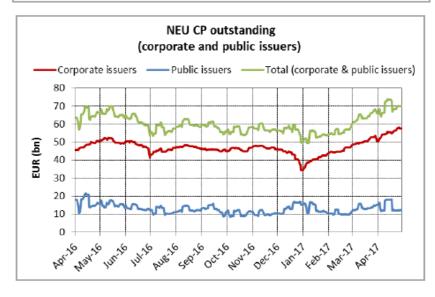
NEU CP (= former French CD)

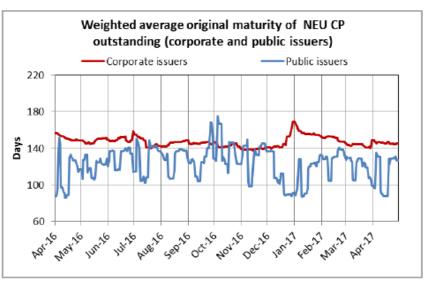
NEU CP Outstanding amounts (in billions of euros)



NEU CP Original maturity (in days)







Source:https://www.banque-france.fr/sites/default/files/media/2017/04/07/highlights_cp_mtn_april_2017_gb_post_ref.pdf.



Every little bit helps... Who is willing to support EMMI's Hybrid Model?

- The new EU Benchmark Regulation comes into play from 1st Jan 2018
 - Implementation of governance systems and other controls to ensure integrity and reliability of in-scope benchmarks
- There are fixed (and floating) transactions within the market, what is holding us back from using them both?
- Don't be afraid to re-invent the benchmark
 - Further encouragement per country to join the Benchmark panel required
 - Operational and legal costs to stay within the panel
 - Make participation an honour, not a burden.
 - How to incentivize a bank to stay in or re-join?
 - Banks evaluate risk of spreads and Risk/Reward
 - Focus on 'the right' Money Market players across the full curve
 - Seamless transition to new benchmark & methodolgy required
 - Euribor contract frustration needs to be avoided
- Euribor ® Hybrid Model
 - Definition: Hybrid / hʌɪbrɪd/ "a thing made by combining two different element"
 - Definition: Cost of Funds / Waterfall "...describes a development method that is linear, sequential, a life cycle"
- Are market users fully aware of their most active benchmark, its contingency and fallback procedures?
 - 1mth Euribor i.e. for Internal transfer pricing?
 - 3mth Euribor i.e. for CCY swaps?
 - 6mth Euribor i.e. for asset swaps?
 - 12mth Euribor i.e. for retail mortgages?

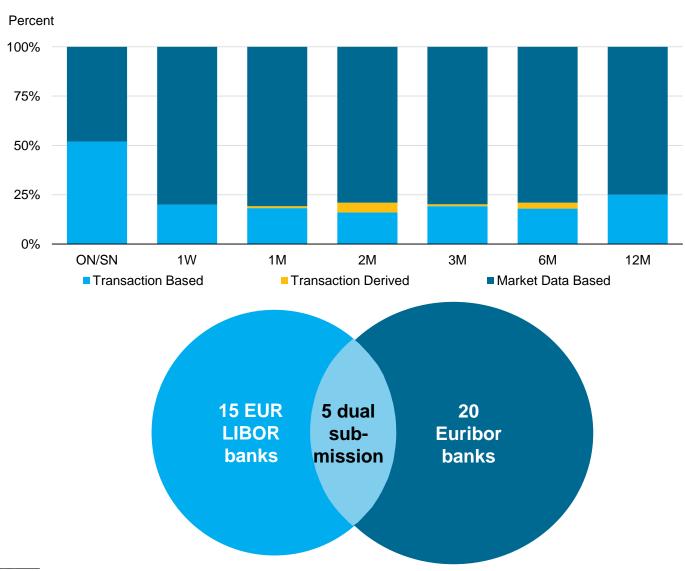


The future of EUR LIBOR as per IBA

- Financial Stability Board recommendation in 22 July 2014 to "Reform Major Benchmarks Interest Rates"
- LIBOR introduction of new submission methodology
 - Submissions will be non-subjective and fully transaction-based wherever feasible
 - IBA will implement a uniform submission methodology for LIBOR panel banks
 - IBA will publish a single, clear, comprehensive and robust LIBOR definition
 - Waterfall:
 - ▶ Level 1: Volume Weighted Average Price (VWAP) in unsecured deposits, CP's and CD's
 - ▶ Level 2: Transaction derived data including time-weighted historical transactions for market movements and interpolation
 - Level 3: If insufficient data in L1 and L2, internally approved procedure with IBA



EUR LIBOR submissions are derived by ... Expert judgement appears essential for most tenors



Source:https://www.theice.com/iba/historical-data.



Observations regarding European benchmark submissions Grouping submissions by country at 12mth Point

Euribor® is the rate at which Euro interbank term deposits <u>are offered by one prime bank to another prime bank</u> within the EMU zone, and is calculated at 11:00 a.m. (CET) for spot value (T+2).

- Large spread in submissions
- Is the European geography fairly reflected, concentration issues?
- Do banks use consistent and similar methodologies?
- Do banks differentiate between LCR efficient cash in their submission (60% or 100% outflow?)

Country	Average Submission of panel banks	12mth Euribor	Submission / Libor	Generic 12mth Government Yield	12mth Germany	Government / Libor
France	-0.194	-0.131	-0.063	-0.550	-0.750	0.200
Belgium	-0.140	-0.131	-0.009	-0.567	-0.750	0.183
Luxembourg	-0.140	-0.131	-0.009			
Netherlands	-0.130	-0.131	0.001	-0.680	-0.750	0.070
Spain	-0.130	-0.131	0.001	-0.320	-0.750	0.430
Italy	-0.126	-0.131	0.005	-0.320	-0.750	0.430
Greece	-0.120	-0.131	0.011			
UK	-0.120	-0.131	0.011			
Germany	-0.090	-0.131	0.041	-0.750	-0.750	-
Portugal	-0.070	-0.131	0.061	-0.230	-0.750	0.520

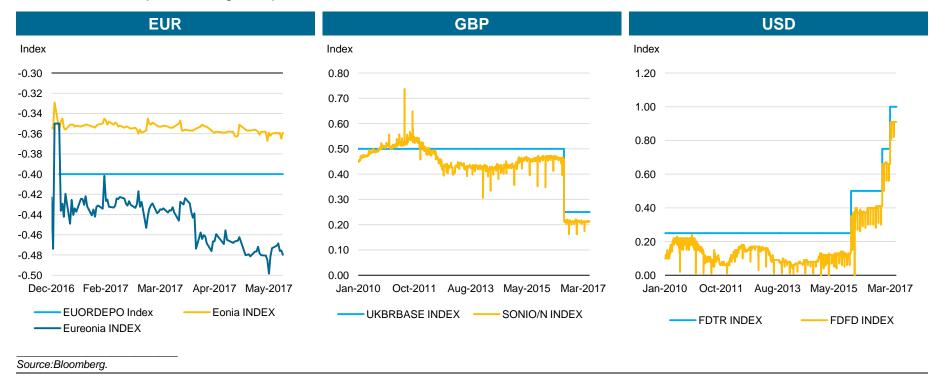
Source:. Bloomberg, per 30th May 2017.



EONIA compared to international peers

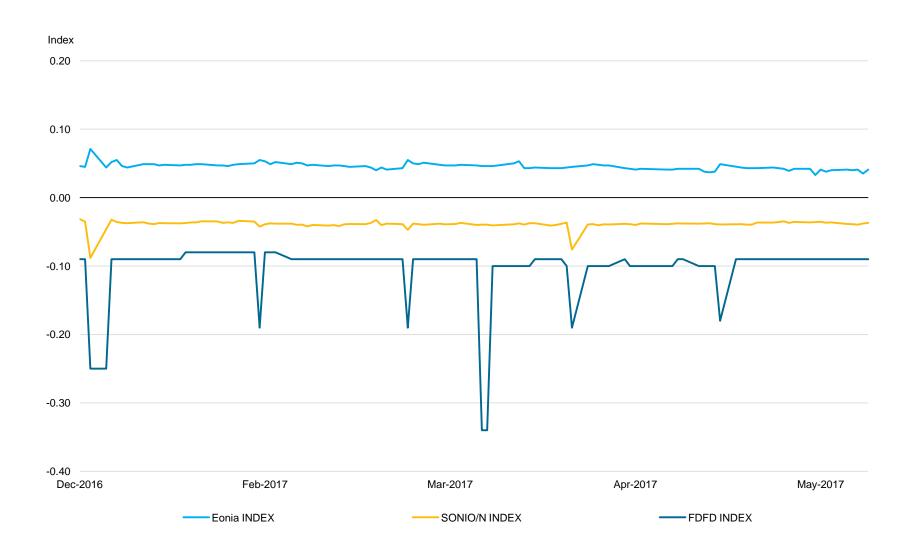
Background:

- Definition challenge: EONIA (Euro OverNight Index Average) is computed as a weighted average of all overnight unsecured <u>lending</u> transactions in the interbank market, undertaken in the European Union and European Free Trade Association (EFTA) countries by the Panel Banks.
- Departure of panel banks, 80% of daily transactions are coming from 5 banks.
- EONIA volume dropping on German bank holidays below €1bln, is EONIA really a Pan-European Benchmark?
- Does the definition of lending transactions reflect the market considering individual ways passing on regulatory costs?
- EONIA in comparison to global peers





OIS vs. Benchmark Rate



Source:Bloomberg.



EUR overnight fixing

- Since May 2017 addtional two banks left the EONIA panel
- Could the future o/n Benchmark be moving from lending to borrowing?
- Could ECB make all MMSR data anonymously available to EMMI?
- Could a value date approach instead of trade date approach increase volumes considerably?
- Would banks create an underlying swap market on the ECB?
- Could the ECB take a similar approach as taken by BOE and FED creating their own benchmarks?



Summing up

- Euribor is a systemic relevent Benchmark tied to c.€105tr in contracts
- Reduced number of panel banks (20) providing Euribor submissions could create challenges for the actual or perceived credibility of the benchmark
- EONIA volumes are shrinking
 - 2017 average below €10bn
 - Top 5 banks contribute >80% of the volume*
 - Record low volume of €836m on 2nd June 2017
- A change to the benchmark definitions would help to maintain their credibility and relevance
- Collective interest in robust Interest Rate benchmarks for the functioning of markets and transition of monetary policies
- Mandatory contribution is not a long term solution once triggered it begins the process of the wind down of the benchmark



*Source: Eonia consultation paper 2016

Disclaimer

Markets - Legal - EME

The Markets Legal team is responsible for providing legal, risk management and transaction execution advice to support Markets across a wide variety of products in every major jurisdiction in the APAC, EMEA and Americas regions.

Products' coverage includes the following:

- > Equities (including Equity Sales & Trading, Equity Derivatives and EFS, and Prime Services),
- > Credit (including Securitized Products and Munis), and
- > the Macro businesses (including Rates, Foreign Exchange (FX), Commodities, Markets Solutions Group (MSG) and eFICC).

In addition, the Markets Legal team provides the following services:

- Developing, revising and negotiating legal documents (including engagement letters, confidentiality agreements and master agreements);
- · Provides risk management, conflict/business selection and disclosure-related advice for transactions;
- . Serves as legal counsel to the Firm's committees, including, among others, the Client and Markets Conflict Forums, the Retail Oversight Forum and the Suitability Committee;
- · Develops internal policies, procedures and guidance;
- · Arranging and conducting training programs for Markets businesses;
- · Participate in new product approval process;
- · Managing relationships with external counsel;
- Representing the Firm in certain industry trade groups;
- · Participating in consultations initiated by regulatory and supervisory bodies

