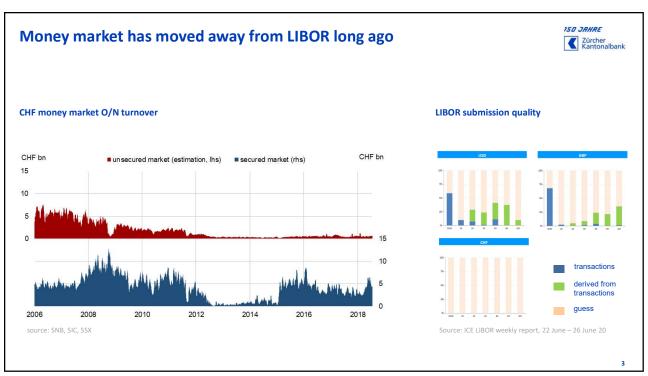
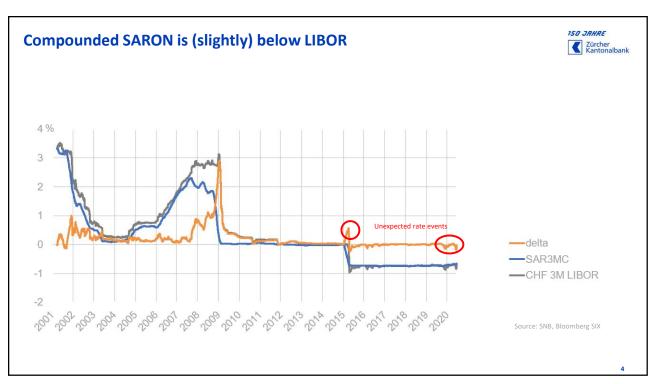


Bye Bye LIBOR

CHF LIBOR is not expected to exist after 2021 –
Announcement might come as early as late 2020





Why the NWG did not recommend a derivative-based term rate



Transition will only reduce vulnerabilities if it addresses the core weakness of the IBORs – the lack of deep and liquid underlying markets. (FSB letter July 2018, http://www.fsb.org/wp-content/uploads/P120718.pdf)

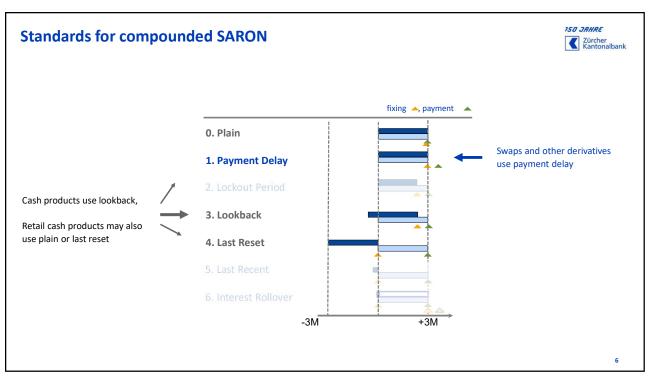


3M SARON swap/future rate would be a forward looking term rate

Compounded SARON is not a forward looking term rate

- no deep and liquid market in short-term CHF interest rate derivatives
- ✗ high volatility of swap and future rates
- × no perfect trade repository for swaps
- ✓ deep, liquid and transparent market
- ✗ psychology: different to LIBOR

5



The cash markets have started with mortgages



Mortgages

GLKB lookback 5 days term UBS perp plain term lookback 5 days Raiffeisen plain term LUKB lookback 2 days term ZKB lookback 2 days perp WIR term last reset (announced) CS plain and last reset (announced) term

Product differentiation without market fragmentation

Banks report positive customer feedback

Corporate loans

SME

Some banks offer SARON loans to SME based upon their mortgage offering.

Multinational corporates and institutional clients

NWG has recommended **lookback 5 days** for syndicated loans. This might be a standard for large bilateral loans as well

NWG liaises with other currency groups for standards in multicurrency loans

Limited number of transactions so far

7

CHF FRN expected to be fully implemented by end of 2020



National Working Group on Swiss Franc Reference Rates (NWG)

2 July 2019

Discussion paper on SARON Floating Rate Notes

- The purpose of this paper is to evaluate interest rate provisions for SARON Floating Rate Notes (FRN) assuming that a time lag is required to address operational matters related to the timely determination of interest payments. Further, a sample fallback language is provided.
- Based on the following assessment, the advantages of the approach "Lookback" (approach 3) outweigh its small inherent economic drawbacks. Thereby a time lag between there to five days is deemed sufficient to deal with operational matters. In addition, such as time largest operational acceptance, as it is already applied in FRN referencing to other alternative risk-flee rates (RTR).

- The National Working Group on Swiss Franc Reference Rates is the key forum for considering
 proposals to reform reference interest rates in Switzerland and discussing the latest international
 development. The NPWG is co-bailed by a representative of the private sector and a representative of the SNB, NWG recommendations are not legally binding.
- The results of this assessment were discussed at the NWG meeting on 5 February 2019.¹ The NWG concluded that there are no impediments to issuing SARON FRN and supported the pref-erence for the approach "Lookback".² Exchanges were thereby encouraged to facilitate the list-ing of SARON FRN.

Evaluated approaches³

- Payment delay
 Lockout period
 Lookback

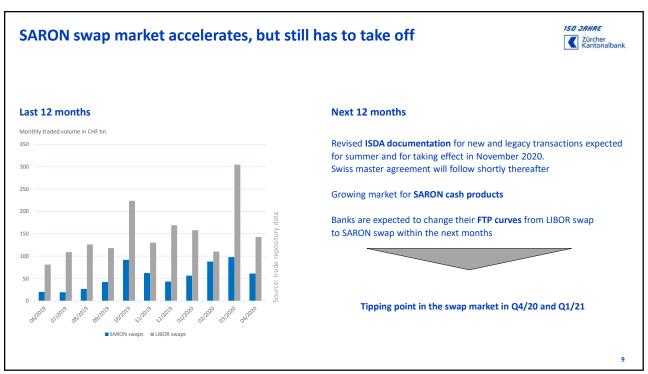
Please refer to the appendix II for a detailed description of the approaches considered and other proposed provisions.

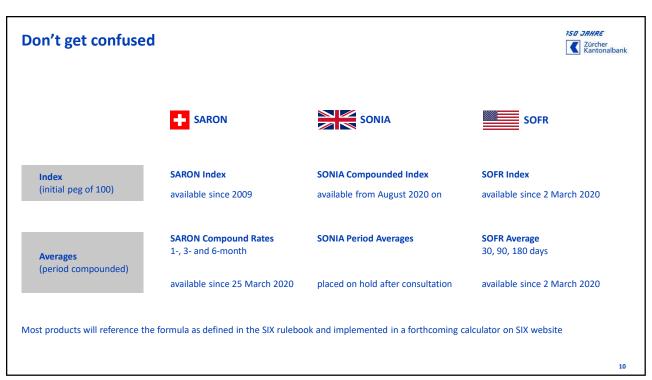
One standard recommended by NWG

Fully specified template:

- Interest rate calculation: lookback [3/4/5] days
- SARON fallback language

NWG has asked SIX to implement the standard by end of 2020





Tough legacy



The problem

For some legacy positions a transition before the end of LIBOR is unfeasible because of **missing robust fallback language** and other features like product complexity or large number of counterparties, investors or customers

Sorry, no loophole: So far only a very small amount of tough legacy in CHF is expected

The magnitude

Only limited tough legacy issues identified in CHF so far.

Significant issues for other currencies, e.g. in the bond markets $% \left(1\right) =\left(1\right) \left(1\right) \left$

Remedy

The USD ARRC has proposed **legislative relief** under NY state law.

The GBP RFRWG has issued a tough legacy paper. Subsequent UK government has announced to update the UK **Benchmark Regulation** (BMR) to empower FCA to introduce methodological changes to deal with tough legacy. This might be a way forward for EU BMR, too.

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