

Questionnaire re: LIBOR Benchmark Transition

LIBOR Transition Strategy

1. Would the discontinuation of LIBOR have a significant impact on your institution?
 - a. If yes, what is your assessment of the risks arising from inadequate transition away from LIBOR?
 - b. If not, please explain why you do not consider financial market reliance and exposure to LIBOR to be a material risk.

2. Do you have a strategy to make a timely, safe and sound transition away from LIBOR to alternative reference rates?
 - a. If yes, please set out the key elements of your strategy to ensure a timely, safe and sound transition
 - b. If not, please explain why.

LIBOR Exposures

3. Have you started the process of LIBOR transition to alternative reference rates for legacy and new contracts? If yes, please provide details.

4. Please provide total gross exposure to LIBOR (covering derivatives products, asset side products and liability side products) and the number of contracts.

Exposure as at December 2019

DERIVATIVES Product – Total Gross Notional Exposure	Currency Benchmark	USD		GBP		JPY		CHF		EUR		Comments
		Value	No	Value	No	Value	No.	Value	No.	Value	No.	
		Interest Rate Derivatives – OTC	LIBOR									
	OF WHICH: with fallback ¹											
	RFR											
Interest Rate Derivatives – Exchange Traded	LIBOR											
	OF WHICH: with fallback											
	RFR											
Other (please specify)	LIBOR											
	OF WHICH: with fallback											
	RFR											
Total Derivatives	LIBOR											
	OF WHICH: with fallback											
	RFR											

¹ Fallback refers to sufficiently granular contract language that specify the replacement reference rate in the case of LIBOR cessation.

DERIVATIVES Product – Total Gross Notional Exposure maturing after 2021	Currency Benchmark	USD		GBP		JPY		CHF		EUR		Comments
		Value	No	Value	No	Value	No.	Value	No.	Value	No.	
		Interest Rate Derivatives – OTC	LIBOR									
	OF WHICH: with fallback ²											
	RFR											
Interest Rate Derivatives – Exchange Traded	LIBOR											
	OF WHICH: with fallback											
	RFR											
Other (please specify)	LIBOR											
	OF WHICH: with fallback											
	RFR											
Total Derivatives	LIBOR											
	OF WHICH: with fallback											
	RFR											

² Fallback refers to sufficiently granular contract language that specify the replacement reference rate in the case of LIBOR cessation.

ASSET SIDE Product – Total Gross Exposure	Currency Benchmark	USD		GBP		JPY		CHF		EUR		Comments
		Value	No	Value	No	Value	No.	Value	No.	Value	No.	
Interest Rate Derivatives – OTC	LIBOR											
	OF WHICH: with fallback ³											
	RFR											
Interest Rate Derivatives – Exchange Traded	LIBOR											
	OF WHICH: with fallback											
	RFR											
Other (please specify)	LIBOR											
	OF WHICH: with fallback											
	RFR											
Total Derivatives	LIBOR											
	OF WHICH: with fallback											
	RFR											

³ Fallback refers to sufficiently granular contract language that specify the replacement reference rate in the case of LIBOR cessation.

ASSET SIDE Product – Gross Exposure Maturing after 2021	Currency Benchmark	USD		GBP		JPY		CHF		EUR		Comments
		Value	No	Value	No	Value	No.	Value	No.	Value	No.	
		Bonds and securitisations (including CLOs)	LIBOR									
	OF WHICH: with fallback ⁴											
	RFR											
Syndicated Loans	LIBOR											
	OF WHICH: with fallback											
	RFR											
Bilateral Business Loans	LIBOR											
	OF WHICH: with fallback											
	RFR											
Retail Mortgages / Consumer Loans	LIBOR											
	OF WHICH: with fallback											
	RFR											
Preferred Stocks	LIBOR											
	OF WHICH: with fallback											
	RFR											
Other (please specify)	LIBOR											
	OF WHICH: with fallback											
	RFR											

⁴ Fallback refers to sufficiently granular contract language that specify the replacement reference rate in the case of LIBOR cessation.

ASSET SIDE Product – Gross Exposure Maturing after 2021	Currency Benchmark	USD		GBP		JPY		CHF		EUR		Comments
		Value	No	Value	No	Value	No.	Value	No.	Value	No.	
		Total	LIBOR									
	OF WHICH: with fallback											
	RFR											

LIABILITY SIDE Product – Total Gross Exposure	Currency Benchmark	USD		GBP		JPY		CHF		EUR		Comments
		Value	No	Value	No	Value	No.	Value	No.	Value	No.	
CDs and deposits	LIBOR											
	OF WHICH: with fallback ⁵											
	RFR											
Senior debt	LIBOR											
	OF WHICH: with fallback											
	RFR											
Subordinated debt	LIBOR											
	OF WHICH: with fallback											
	RFR											
Preferred stock	LIBOR											
	OF WHICH: with fallback											
	RFR											
Other (please specify)	LIBOR											
	OF WHICH: with fallback											
	RFR											
Total	LIBOR											
	OF WHICH: with fallback											
	RFR											

⁵ Fallback refers to sufficiently granular contract language that specify the replacement reference rate in the case of LIBOR cessation.

LIABILITY SIDE Product – Gross Exposure maturing after 2021	Currency Benchmark	USD		GBP		JPY		CHF		EUR		Comments
		Value	No	Value	No	Value	No.	Value	No.	Value	No.	
CDs and deposits	LIBOR											
	OF WHICH: with fallback ⁶											
	RFR											
Senior debt	LIBOR											
	OF WHICH: with fallback											
	RFR											
Subordinated debt	LIBOR											
	OF WHICH: with fallback											
	RFR											
Preferred stock	LIBOR											
	OF WHICH: with fallback											
	RFR											
Other (please specify)	LIBOR											
	OF WHICH: with fallback											
	RFR											
Total	LIBOR											
	OF WHICH: with fallback											
	RFR											

⁶ Fallback refers to sufficiently granular contract language that specify the replacement reference rate in the case of LIBOR cessation.

5. Please indicate areas of assessment

<input type="checkbox"/>	Governance framework and organisational structure, including having firm level plan and allocation of resources
<input type="checkbox"/>	Measurement of own exposure and roll off timelines
<input type="checkbox"/>	Valuation
<input type="checkbox"/>	Risk management
<input type="checkbox"/>	Internal audit and controls
<input type="checkbox"/>	Tax and accounting implications
<input type="checkbox"/>	New RFR product design
<input type="checkbox"/>	Potentially required system changes
<input type="checkbox"/>	Legal contract review and remediation
<input type="checkbox"/>	Transition (LIBOR / RFR) client outreach
<input type="checkbox"/>	Issues arising from regulatory frameworks
<input type="checkbox"/>	Other (please specify)

6. Please discuss the progress of migration to alternative benchmarks and the adoption of robust fallbacks (e.g. ISDA’s protocols for derivatives). Please discuss targets and roll of timelines, if applicable.
7. Please explain how targets are set, including underlying criteria.
8. Please discuss intermediate targets, if any, from now until end-2021.
9. Please explain how targets are tracked and applied.
10. Please discuss if there are alternative methods to ensure continued progress in transition.
11. Please discuss any LIBOR exposures that cannot be transitioned. What is the reason why the transition cannot be achieved and for which products?
12. Please indicate whether internal processes and organizational structures - i.e. “transition teams” – to manage the transition to alternative reference rates.
13. Please discuss budget and other resources committed to the transition to alternative reference rates by end-2021. What is the estimated cost of transition?
14. Please discuss work with private sector clients to mitigate issues and facilitate benchmark transition.
15. What changes to systems, products or contractual amendments are used to mitigate the impact? Are there any potential conflicts / frictions, such as re-opening of contractual negotiations, etc. expected?

<input type="checkbox"/>	ISDA fallback
<input type="checkbox"/>	Loan fallback
<input type="checkbox"/>	System issues / changes
<input type="checkbox"/>	New RFR product offerings
<input type="checkbox"/>	RFR-LIBOR basis swap
<input type="checkbox"/>	Other (please specify)

16. On a scale from 1 to 4, what is your assessment of the status of preparedness of your clients?

<input type="checkbox"/>	1 = not aware of transition
<input type="checkbox"/>	2 = planning on transition
<input type="checkbox"/>	3 = transition in progress
<input type="checkbox"/>	4 = transition completed

Please elaborate.

17. What, if any, are the differences between client types? Please elaborate.

18. overall, what is your assessment of the main obstacles to a successful transition? Please identify the top three from the following list by writing 1, 2 and 3 in the relevant box (where 1 is the obstacle you consider to be the biggest). Where you select 'other', please specify.

<input type="checkbox"/>	Lack of liquidity in new RFRs
<input type="checkbox"/>	Lack of term rates for new RFRs
<input type="checkbox"/>	Inadequacy of fallback provisions
<input type="checkbox"/>	Cross border issues
<input type="checkbox"/>	Challenges agreeing contract amendments
<input type="checkbox"/>	Lack of action / engagement from market participants
<input type="checkbox"/>	Lack of awareness
<input type="checkbox"/>	Lack of understanding on the use of RFRs
<input type="checkbox"/>	Other (please specify)

19. Have internal targets and deadlines for transition from LIBOR to alternative reference rates?

20. Has audit (internal / external) assessed whether these targets are reasonable and effective? If so, please describe the overall framework.

21. What are the key indicators that are covered under these targets? e.g. % of financial contracts referencing LIBOR and alternative reference rates, % of financial contracts adopted fallback protocols.

22. Have any requirements been imposed by the parent company?

23. Have you evaluated external vendors for benchmark transition?