

# **General IBOR Transition Risk Disclosure**

We seek to ensure that our clients are aware of the changes that are taking place with reference to the London Inter-Bank Offered Rate (LIBOR) and other impacted interbank-offered rates (together with LIBOR, the "IBORs"). The changes are limited to the IBORs and may impact you depending on the reference rates used in your contract. This explanation and general risk warning is provided for customers of Emirates NBD and each of its affiliates (collectively, ENBD) who may have a conventional or Islamic product or agreement which uses the London inter-bank offered rate ('LIBOR') or another interbank offered rate (together with LIBOR, the 'IBORs') as a benchmark rate.

#### What is LIBOR?

The London Interbank Offered Rate (LIBOR) is administered by ICE Benchmark Administration Limited. LIBOR is one of the most commonly used benchmarks for interest rates and is referenced in financial products such as derivatives, bonds, loans, structured products, mortgages and student loans. It often forms the basis on which interest payments under those products are calculated.

Information about LIBOR Currencies and Tenors							
Currencies	USD		GBP	EUR	JP	1	CHF
Tenors	O/N	1W	1M	2M	3M	6M	12M

It is based on submissions from panel banks, which indicate the rate at which they could borrow from other banks, resulting in the publication of 35 rates across tenors and currencies every applicable London business day.

Further information about LIBOR is available at: <a href="https://www.theice.com/iba/libor">https://www.theice.com/iba/libor</a>

#### What is IBOR transition or Benchmark Reform?

In July 2017, Andrew Bailey, Chief Executive of the UK Financial Conduct Authority (FCA) announced that LIBOR rates would only be formally sustained by the FCA through the end of 2021, due to limited market activity around LIBOR benchmarks and the declining contributions of panel banks. The FCA has negotiated with current panel banks for their agreement to continue contributing data towards LIBOR rate generation through the end of 2021, beyond which they will not be obligated to submit their data. This arrangement may result in the last LIBOR rate being published on 31st December 2021. Hence, the drive to transition away from current LIBORs or IBORs to Alternative Reference Rates (ARRs) is what is referred to as IBOR transition.

# Does it only affect LIBORs or other IBORs as well?

No, this transition does not affect LIBORs only. Other interbank offered rates ("IBORs") are also being reformed so that they are calculated wherever possible by reference to actual transactions. For example, the Euro Overnight Index Average (EONIA) has been using a new calculation methodology from 2 October 2019 before being replaced by €STR from 3 January 2022.

# What are the alternative reference rates (ARRs) that could replace LIBOR?

Currency	Existing Rate	Alternative Rate	Transaction Type	Status
GBP	GBP LIBOR	SONIA Overnight	Unsecured	Live
		(Sterling Overnight Index Average)		
EUR	EURIBOR / EONIA	€STR	Unsecured	Live
		(Euro Short-Term Rate)		
USD	USD LIBOR	SOFR	Secured	Live
		(Secured Overnight Financing Rate)		
JPY	JPY LIBOR	TONAR	Unsecured	Live
		(Tokyo Overnight		
		Average Rate)		
CHF	CHF LIBOR	SARON	Secured	Live
		(Swiss Average Rate		
		Overnight)		

#### Where can I find more information on RFRs?

Currency	Working Group	Working Groups Links		
GBP	Bank of England and	https://www.bankofengland.co.uk/markets/tran		
	FCA Working Group	sition-to-sterling-risk-free-rates-from-libor		
EUR	European Central Bank	https://www.ecb.europa.eu/paym/initiatives/int		
	Working Group	erest_rate_benchmarks/WG_euro_risk-		
		free_rates/html/index.en.html		
USD	Federal Reserve	https://www.newyorkfed.org/arrc		
	Alternative Reference			
	Rates Committee			

JPY	Bank of Japan	https://www.boj.or.jp/en/paym/market/jpy_cmt
		e/index.htm/
CHF	Swiss National Bank Working Group on Swiss Franc Reference Rates	https://www.snb.ch/en/ifor/finmkt/fnmkt_bench m/id/finmkt_reformrates

# When LIBORs or other IBORs are unavailable, how will my existing agreements be affected?

In a scenario when IBORs cease to exist, then the interest rates and other parameters related to the specific product may be determined based on the fall-backs present (if present) in the corresponding agreements. These fall-back arrangements may indicate what the replacement benchmark rates would be and what adjustment spreads may need to be applied to the ARRs to appropriately replace the outgoing rates.

### What other impacts should I be wary of pertaining to this transition?

- 1. Emirates NBD may have to make technical and operational changes to its products and agreements
- 2. ARRs may be higher, lower or more volatile than the outgoing IBORs
- 3. The fall-back parameters may dictate the composition of the interest paid / received by you in the ARR environment
- 4. Emirates NBD may entail varying strategies for different products. Hence, from your perspective, different products in a portfolio may witness different transitioning conditions
- 5. Margin calculations, fees and charges may be affected

IBOR transition is an ongoing process that Emirates NBD is aware of. The above impacts are not exhaustive but are presented to give you an idea of the nature of the impacts that the Bank foresees. Emirates NBD is assessing impacts and designing risk mitigating strategies as the market develops more clarity around the transition.

For further information on IBOR transition and its impact on Emirates NBD, please contact your Corporate Relationship Manager.