Consultation on proposed amendments to the methodology of certain Credit Suisse International indices in connection with LIBOR and EONIA discontinuation

LIBOR and EONIA Replacement Consultation #8: Single Stock Indices and Credit Indices

This document is addressed to relevant users and stakeholders and is published by Credit Suisse International (**"CSI**") as the administrator of the CSI indices listed in Schedule 1 (the **"Benchmarks**"), and supersedes the prior notice with the same title dated October 27th 2021.

In light of the upcoming discontinuation of the London Inter-bank Offered Rate ("**LIBOR**") and the Euro Overnight Index Average ("**EONIA**"), as further described in "*Background to the Consultation*" below, and since the methodology of the Benchmarks currently incorporates references to LIBOR and/or EONIA, CSI, acting through its Benchmark Governance Committee, is consulting on its proposed amendments to the methodology of the Benchmarks (the "**Consultation**").

The aim of this Consultation is to provide users and stakeholders with: (i) applicable background; (ii) clear information on the proposed amendments; and (iii) practical information on responding to the Consultation and next steps.

If you do not understand the contents of this notice or are unsure how this affects you, you should consult an appropriate professional adviser.

Background to the Consultation

LIBOR

LIBOR is the benchmark of the interest rates at which major banks lend to each other in the interbank market. It is published in five currencies (US Dollar, Euro, British Pound, Japanese Yen, and Swiss Franc), administered by ICE Benchmark Administration Limited and regulated by the UK's Financial Conduct Authority (**"FCA**").

On 5 March 2021, the FCA published an announcement on the future cessation or loss of representativeness of the LIBORs¹, confirming that:

- publication of all tenors of euro LIBOR, Swiss franc LIBOR, Japanese yen LIBOR, Sterling LIBOR, and the 1week and 2-month USD LIBOR tenors would cease to be provided or would no longer be representative immediately after 31 December 2021; and
- publication of all other USD LIBOR tenors would cease to be provided or would no longer be representative immediately after 30 June 2023.

In response to the Financial Stability Board recommendation of the development and adoption of alternative nearly risk-free rates, the following alternatives have been proposed:

LIBOR Currency	Proposed Replacement Rate	
USD	Secured Overnight Financing Rate ("SOFR")	
GBP	Sterling Overnight Index Average ("SONIA")	

¹

Available here: https://www.fca.org.uk/publication/documents/future-cessation-loss-representativeness-libor-benchmarks.pdf

EUR	Euro Short-Term Rate (" €STR ")
CHF	Swiss Average Rate Overnight (" SARON ")
JPY	Tokyo Overnight Average Rate (" TONAR ")

Where changing from a term reference rate to an overnight reference rate would have an impact on an instrument referencing such rate, a spread may be applied to address such impact. In the case of LIBORs, the International Swaps and Derivatives Association, Inc ("**ISDA**") has applied spreads in the LIBOR fallbacks contained in the 2006 ISDA Definitions, calculated using a historical median approach over a five-year lookback period from the date of an announcement on cessation or non-representativeness, and incorporate differences in tenor, credit risk premium and other factors.

EONIA

On 2 October 2019 the methodology of calculating EONIA, the rate at which banks of sound financial standing in the European Union and European Free Trade Area lend Euro-denominated funds in the interbank market, was amended to be the Euro Short-Term Rate plus a spread of 0.085 per cent, based on the methodology recommended by the working group (established by the ECB, European Securities and Markets Authority, the European Commission and the Belgian Financial Services and Markets Authority) on euro risk-free rates. The European Money Markets Institute has announced that it will cease publication of EONIA on 3 January 2022.

Proposed amendments to the methodology of the Benchmarks

In the context of the above, CSI, as administrator of each of the Benchmarks proposes the following amendments. The purpose of these amendments is to replace Benchmark inputs which are based on LIBOR or EONIA with suitable alternative inputs.

It is proposed that, with effect from the 'Replacement effective date' specified in Schedule 2, each reference rate specified as an "Input Reference Rate" in Schedule 2 which is used in the provisions of the index rules of the Benchmarks to determine the value of either (i) a cash component or cash asset, or (ii) a funding component or funding asset (including for the purposes of determining the 'excess return' value of any asset), in each case included in the Benchmark calculation, will be amended to refer to the specified replacement rate of the relevant tenor (each a "**Replacement Reference Rate**") specified in Schedule 2 in relation to the relevant Input Reference Rate.

The replacement reference rates proposed are those recommended by the Financial Stability Board as described in *"Background to the Consultation"* above.

Consultation process

In order to take into account the views of users and stakeholders, CSI, as administrator of each of the Benchmarks, is conducting this Consultation on the proposed amendments. The Consultation opens on Wednesday 27 October 2021 and will run until close of business in New York on Tuesday 30 November 2021 (the "**Consultation Period**").

Within the Consultation Period, users and stakeholders are invited to send any feedback or comments on this Consultation to: <u>list.qis-consultation@credit-suisse.com</u>.

This Notice and any relevant updates relating to the Consultation will be made available here: <u>https://www.credit-suisse.com/uk/en/investment-banking/financial-regulatory/customer-notices.html?a=32</u>

Exiting positions or products prior to the implementation of any amendments

Users or stakeholders who wish to exit a position or product referencing a Benchmark prior to the implementation of any amendments should contact CSI via their usual contact or via email addressed to <u>list.qis-consultation@credit-suisse.com</u>.

SCHEDULE 1

IMPACTED BENCHMARKS AND TICKERS

Index Name	Bloomberg Ticker
Credit Suisse Anxious Societies EUR Index	CSEAASET
Credit Suisse Infrastructure EUR Index	CSEAIET
Credit Suisse Global Family EUR Index	CSEAGFE
Credit Suisse Silver Economy EUR Net Index	CSEASEEN
Credit Suisse Global Family CHF Index	CSEAGFC
Credit Suisse Millennials' Values EUR Index	CSEAMVET
Credit Suisse Silver Economy EUR Index	CSEASEET
Credit Suisse Technology at the Service of Humans EUR Index	CSEATET
Credit Suisse Listed Swiss Real Estate Funds Index	CSEASREF
Credit Suisse Credit Carry USD ER Index	CSEACAUE

SCHEDULE 2

Input Reference Rate	Tenor	Replacement Rate	Replacement effective date
CHF LIBOR	Spot		3 January 2022
	1 week		3 January 2022
	1 month	SARON Fixing 3. (Market	3 January 2022
	2 months	Close. 18:00 pm CET)	3 January 2022
	3 months	(BBG: SRFXON3 Index)	3 January 2022
	6 months		3 January 2022
	12 months		3 January 2022
EUR LIBOR	Overnight		3 January 2022
	1 week		3 January 2022
	1 month	ESTR Volume Weighted	3 January 2022
	2 months	Trimmed Mean Rate	3 January 2022
	3 months	(BBG: ESTRON Index)	3 January 2022
	6 months		3 January 2022
	12 months		3 January 2022
USD LIBOR	Overnight		3 January 2022
	1 week		3 January 2022
	1 month	United States SOFR	3 January 2022
	2 months	Secured Overnight Financing Rate	3 January 2022
	3 months	(BBG: SOFRRATE Index)	3 January 2022
	6 months		3 January 2022
	12 months		3 January 2022
GBP LIBOR	Overnight	SONIA Interest Rate Benchmark	3 January 2022
	1 week	(BBG: SONIO/N Index)	3 January 2022
	1 month		3 January 2022
	2 months		3 January 2022
	3 months		3 January 2022
	6 months		3 January 2022
	12 months		3 January 2022
JPY LIBOR	Overnight		3 January 2022
	1 week		3 January 2022
	1 month	Bank of Japan Final Result: Unsecured	3 January 2022
	2 months	Overnight Call Rate	3 January 2022
	3 months	TONAR (BBG: MUTKCALM Index)	3 January 2022
	6 months		3 January 2022
	12 months		3 January 2022
EONIA	Overnight	ESTR Volume Weighted Trimmed Mean Rate (BBG: ESTRON Index)	3 January 2022

INPUT REFERENCE RATES AND REPLACEMENT REFERENCE RATES