

# LIBOR

# Transition

Five steps you can take to start preparing for the anticipated end of LIBOR



# What's happening?

LIBOR (London Inter-bank Offered Rate) is expected to be phased out and replaced by various alternative risk-free-rates (RFRs) across global financial markets.

Based on statements by the Financial Conduct Authority (FCA), the expectation is that LIBOR will be phased out by the end of December 2021.

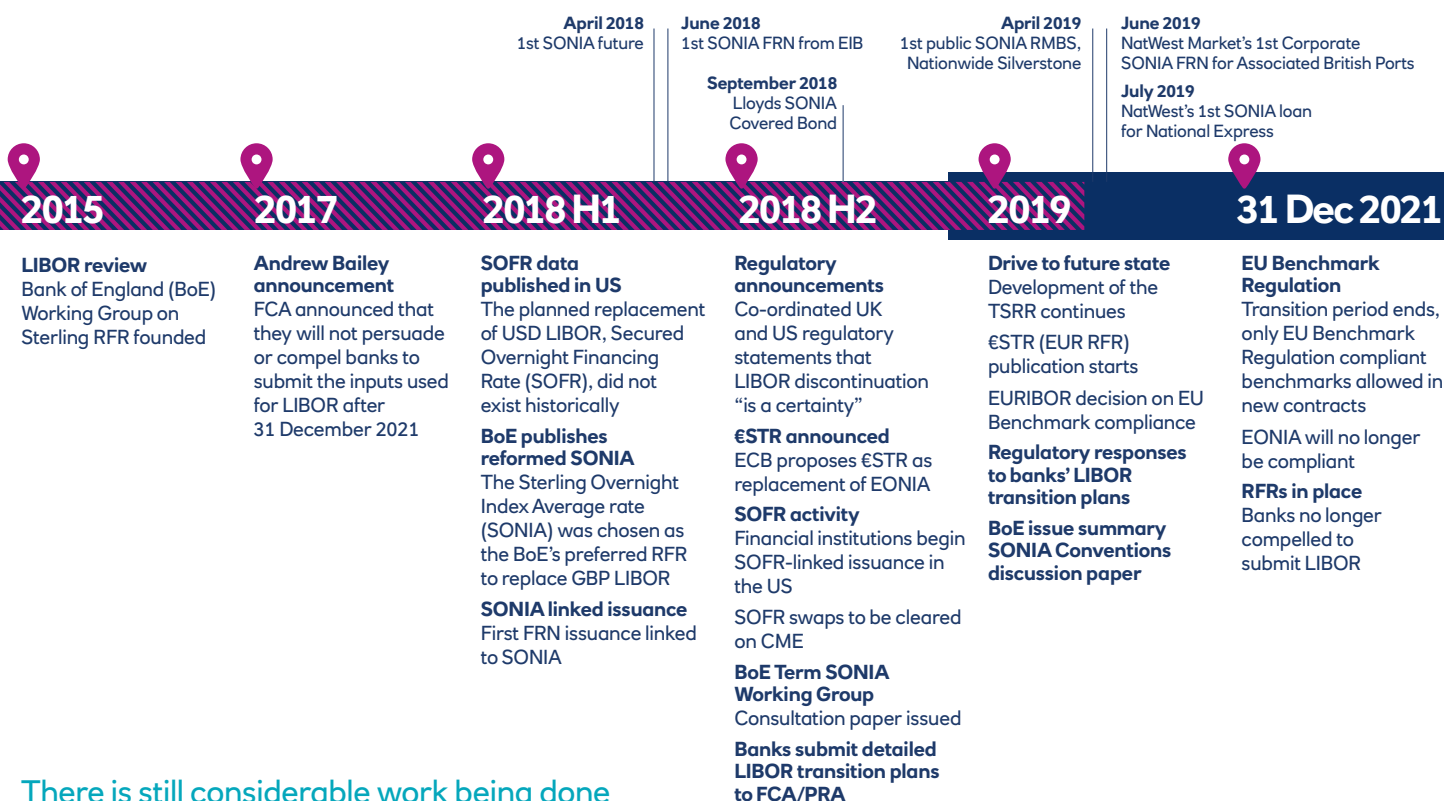
**This change may impact products you have or may be considering purchasing from Royal Bank of Scotland International.**

To help guide you through the upcoming phasing out of LIBOR, we've laid out some information you should know at this stage – together with five practical steps you can take now to start preparing for this transition.

## Did you know?

LIBOR is calculated and published daily across five currencies (GBP, USD, EUR, JPY and CHF) and seven maturities (overnight, one week, and 1, 2, 3, 6 and 12 months) by the Intercontinental Exchange Benchmark Administrator (ICE BA).

It's based on submissions by a number of panel banks using available transaction data and their expert judgement. LIBOR should provide an indication of the average rate at which each panel bank can borrow unsecured funds in the London inter-bank market for a given period, in a given currency. This rate is published and used by the financial markets.



There is still considerable work being done across the industry and applicable jurisdictions to develop new RFRs. Given the complexity of changes to these critical benchmarks we want to share some information with you now about the anticipated transition. It's likely that the process to replace LIBOR will have an impact on both new and existing transactions.

**LIBOR is expected to be phased out by the end of December 2021**



## Step one

### Get up to speed on what's changing

Major interest rate benchmarks are to be phased out globally and replaced by RFRs.

LIBOR is one of a number of Inter-bank Offered Rates (IBORs) that are used in global financial markets.

It's used as a key interest rate benchmark across a number of products such as Bonds and Loans, as well as for banks and other financial institutions own funding and capital needs.

Financial regulatory authorities have expressed their concern that the inter-bank lending market, which LIBOR is intended to reflect, is no longer sufficiently active or liquid.

The Financial Stability Board (FSB) has advised that near risk-free rates, which are based on more active and liquid overnight lending markets, are used instead of LIBOR.

Work is also underway to reform or replace other global IBORs (such as the Euro Inter-bank Offered Rate – EURIBOR and the Euro Overnight Index Average – EONIA).

**GBP LIBOR is expected to be replaced by SONIA across global financial markets by the end of 2021 (according to the FCA). The table below sets out the likely replacement benchmarks for LIBOR:**

Currency	GBP	USD	EUR	CHF	JPY
Alternative rate	<b>Reformed SONIA<sup>2</sup></b>	<b>SOFR<sup>1</sup></b>	<b>€STR<sup>2</sup></b>	<b>SARON<sup>1</sup></b>	<b>TONAR<sup>2</sup></b>
	<p>The Bank of England's (BoE) Working Group has recommended that Sterling Overnight Index Average rate (SONIA) is the preferred rate to replace Sterling LIBOR.</p> <p>SONIA is already widely used for derivatives and bonds, of which NatWest Markets provides various products.</p> <p>Recognising that certain markets may prefer forward-looking term characteristics, the BoE and FCA have consulted the market for views on a forward-looking Term SONIA RFR (TSRR). A decision is expected in late 2019. A summary of consultation findings can be found on: <a href="http://www.bankofengland.co.uk">www.bankofengland.co.uk</a>*</p>	<p>In the US, the Alternative Reference Rate Committee (ARRC) has recommended the Secured Overnight Financing Rate (SOFR) to replace US Dollar LIBOR. The requirement for a Term SOFR is also being considered by the industry and ARRC. Derivative and bond products are developing as markets are adopting the SOFR.</p>	<p>In Europe, the European Central Bank (ECB) has set out its plans for the adoption of the Euro Short-Term Rate (€STR) to replace the Euro Overnight Index Average (EONIA) rate. The ECB has signalled that EURIBOR will continue on a reformed basis.</p>	<p>Local regulators have introduced new RFRs to replace LIBOR.</p>	<p>Local regulators have introduced new RFRs to replace LIBOR.</p>

<sup>1</sup> Overnight, Secured

<sup>2</sup> Overnight, Unsecured

\* Externally hosted website. The Royal Bank of Scotland International is not responsible for the accuracy or content on this site.



## Step two

### Take stock of where you have LIBOR exposure

Identification of your LIBOR exposure is a priority and will enable your business to start detailed planning for the transition.

**LIBOR may not be limited to just your banking products. It may be:**

Used within your own commercial contracts (e.g. late payment clauses).

Embedded in your financial forecasting and budgeting process, including financial system requirements.

Part of your trade financing arrangements (e.g. supplier finance).

Used in pricing any inter or intra company financial arrangements.

Part of your company pension scheme management.

**In addition, depending on the products you hold, you may need to start investigating the impacts from:**

Hedging of discount rates and/or inflation in respect of defined benefit pension liabilities or other post-employment liabilities.

Swapping a debt obligation in one currency to another currency using a cross-currency swap that involves an IBOR.

Discount rates for valuation purposes.

Performance benchmarks for money market funds and/or other asset manager funds.

Long-term project finance contracts/joint ventures.

Hedging the variable interest rate on a floating rate debt obligation by swapping to a fixed rate.

Swapping a fixed-rate to a floating rate using an interest rate derivative.

#### Glossary of definitions

ARRC	Alternative Reference Rate Committee	€STR	Euro Short-Term Rate (€STR)
BoE	Bank of England	EURIBOR	Euro Inter-bank Offered Rate
ECB	European Central Bank	FCA	Financial Conduct Authority
EIB	European Investment Bank	FRN	Floating Rate Note
EONIA	Euro Overnight Index Average	FSB	Financial Stability Board





## Step three

### Consider what the anticipated end of LIBOR could mean for you

This change could be relevant to some products you have already purchased or may be thinking about purchasing from Royal Bank of Scotland International or any other subsidiary owned by NatWest Group plc.

While the market for RFRs is still developing, LIBOR continues to be a widely accepted benchmark in financial markets. For products that may be affected the industry is working together to find the best solution to transition to RFRs by the end of 2021, or in some cases earlier.

Ahead of the discontinuation of LIBOR, market participants need to think about how to review and amend documentation and processes for any existing contracts that reference LIBOR and mature after the end of 2021.

#### How LIBOR compares with RFRs

LIBOR Forward looking 'term rates'	RFRs Overnight rates
Includes an element of credit spread reflecting the borrowing risk in the interbank market.	Based on actual transactions and reset daily in arrears, removes any expectation of future events inherent in a term rate.
Provides a known interest rate and amount of interest due at the end of the borrowing term, something that some customers may find helpful for cash flow forecasting.	SONIA is likely to be a less volatile rate known only at the end of the borrowing term. Customers may favour this rather than a more volatile term rate known at the start of the borrowing term.
	Development of a TSRR would provide borrowers with a rate at the beginning of the borrowing term, similar to LIBOR, although it wouldn't include a credit spread.
	Alternative term RFRs are being considered in the US and Europe that may operate in different ways to a TSRR.

#### Additional product implications:

General market consensus is to include fallback provisions in contractual documentation in case LIBOR stops being used before the relevant transition is completed.

Fallbacks may take the form of a roadmap to determine a replacement rate or reference to a specific replacement rate.

As RFRs develop, differences could occur in relation to fallbacks for different products. These could be, for example, different trigger events, timings, or even a different fallback rate.

#### Did you know?

Products already referencing Base Rate, such as overdrafts and credit cards are not affected by the LIBOR transition.



#### Multi-currency products

RFRs may change how a multi-currency product operates. The industry is working together to find the best solution.



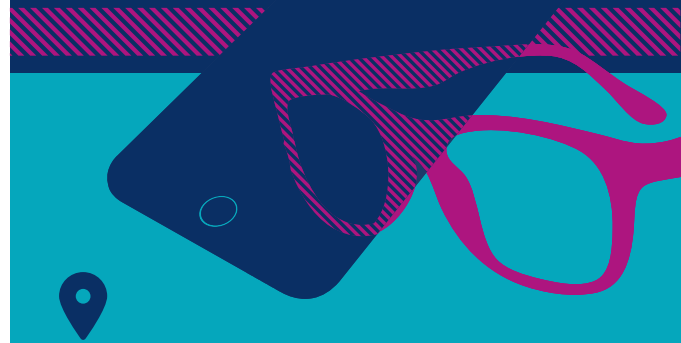
IBOR	Inter-bank Offered Rate	SOFR	Secured Overnight Financing Rate
ICE BA	Intercontinental Benchmark Administrator	SARON	Swiss Average Rate Overnight
LIBOR	London Inter-bank Offered Rate	SONIA	Sterling Overnight Index Average
PRA	Prudential Regulation Authority	TONAR	Tokyo Overnight Average Rate
RFR	Risk Free Rate	TSRR	Term SONIA Reference Rate



## Step Four

### Consider alternatives to LIBOR

You may find it helpful to contact your independent professional advisors (such as accountants or lawyers) to help establish what this transition could mean for you and what alternatives to LIBOR already exist – such as using a Base Rate product where appropriate.



## Step Five

### Look out for further guidance and support from us

We'll continue to work closely with our regulators, market participants, industry bodies and trade associations to consider how the regulatory objective of eliminating reliance on LIBOR to improve global financial stability can best be implemented.

We'll update you on developments throughout the transition process including, how these market-wide changes are likely to affect your day-to-day relationship with us and the products that you have purchased or may be considering purchasing from us.

Above all, we remain committed to supporting you through this transition and will always strive to support you and meet more of your financial needs.



There is no immediate action for you to take and we'll continue to provide timely updates to support you through this transition.

For further information and the latest LIBOR news  
- please visit [rbsinternational.com/libortransition](https://rbsinternational.com/libortransition)

#### **Disclaimer:**

This document has been prepared by NatWest Group plc (NatWest Group) and its affiliates (together 'NatWest Group') and is for the use of intended recipients (the "Recipient") only. This document has been delivered to the Recipient for information purposes only. It does not constitute an offer or invitation for the sale, purchase, exchange or transfer of any investment, loan or asset and is not intended to form the basis of any decision or evaluation by the Recipient and should not be regarded as a recommendation by NatWest Group that the Recipient should participate in any transaction. The Recipient should seek its own financial and tax advice and perform its own independent investigation research and analysis, and shall rely solely on its own judgement, review and analysis to determine its interest in participating in any transaction. Nothing in this document should be construed as legal, tax, regulatory, valuation or accounting advice by NatWest Group for the Recipient; all of which the Recipient acknowledges that it should seek from its own advisers.

The content of this document reflects prevailing conditions and NatWest Group's views as at this date. NatWest Group reserves the right, but shall not be obliged, to revise, update or replace such content. NatWest Group has prepared this document based on information obtained from a number of different sources and assumed, without independent verification, the accuracy and completeness of all such information. No representation, warranty, undertaking or assurance of any kind, express or implied, is or will or has been authorised to be made as to the accuracy or completeness of the document. Without prejudice to the generality of the foregoing, nothing contained in this document is, or shall be, relied upon as a promise or representation as to the achievability or reasonableness of any future projections, estimates, prospects or returns contained herein (or in such other written or oral information provided to the Recipient). The issue of this document shall not be deemed to be any form of commitment on the part of NatWest Group to proceed with any transaction.

NatWest Group shall not be liable for any direct, indirect or consequential loss or damage suffered by any person as a result of relying on any statement in or omission from this document or in any other information or communications made in connection with the matters set out herein. NatWest Group accepts no liability for the actions of any third party referred to in this document. By accepting this document, the Recipient agrees to be bound by the foregoing limitations.

The publication and distribution of this document may, in certain jurisdictions, be restricted by law. Recipients of this document should be aware of, and comply with, applicable legal requirements and restrictions. NatWest Group accepts no responsibility for any violation of any such restrictions.

The Royal Bank of Scotland International Limited ("RBS International") is incorporated in Jersey and registered on the Jersey Financial Services Commission ("JFSC") company registry as a private company with limited liability. It is authorised and regulated by the JFSC with registration number 2304. Registered and Head Office: Royal Bank House, 71 Bath Street, St. Helier, Jersey, JE4 8PJ. Tel. 01534 285200. RBS International London Branch is registered in the United Kingdom as a foreign company with registration number FC034191 and branch number BR019279. United Kingdom business address: 1 Princes Street, London, EC2R 8BP. RBS International London Branch is authorised by the Prudential Regulation Authority and is subject to regulation by the Financial Conduct Authority (reference number 760675) and limited regulation by the Prudential Regulation Authority. Details about the extent of RBS International's regulation by the Prudential Regulation Authority are available on request.

Guernsey business address: Royal Bank Place, 1 Glatigny Esplanade, St. Peter Port, Guernsey, GY1 4BQ. Tel. 01481 710051. Regulated by the Guernsey Financial Services Commission and licensed under the Banking Supervision (Bailiwick of Guernsey) Law, 1994, as amended, the Insurance Managers and Insurance Intermediaries (Bailiwick of Guernsey) Law, 2002 and the Protection of Investors (Bailiwick of Guernsey) Law, 1987, as amended.

Isle of Man business address: 2 Athol Street, Douglas, Isle of Man, IM99 1AN. Tel. 01624 646464. Licensed by the Isle of Man Financial Services Authority in respect of Deposit Taking, Investment Business and registered as a General Insurance Intermediary.

The Royal Bank of Scotland International Limited, Luxembourg Branch, (RBS International Luxembourg Branch). Business address: Espace Kirchberg, The Square, Building A-40 Avenue J.F. Kennedy, L-1855 Luxembourg. Tel. + 352 270 330 355. Authorised and supervised by the Commission de Surveillance du Secteur Financier