PRIIPs – The way forward

May 2018
Agenda

- Introduction: The PRIIPs framework
- PRIIPs: Impact
- Current Challenges
- Current Challenges: Performance Scenarios
- Current Challenges: Insurance
- Current Challenges: Asset Managers
- Current Challenges: Banks and OTC Derivatives
With you today

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Focus on the PRIIPs regulation
Outlining the scope

The PRIIPs regulation* is in force since the 1st of January 2018, impacting the banking, the insurance and the fund industries.

**ASSET MANAGEMENT**
- All investment funds, including UCITS and retail AIF, whether closed ended or open ended
- Discretionary management / Portfolio mandates

**BANKING**
- SPVs, holding companies
- Structured deposits (but not deposits linked solely to interest rates)
- Products with capital and/or return guarantees
- Derivative instruments

**INSURANCE**
- Unit-linked life insurance (external funds, FIC, FID, FAS)
- Certain pension products
- Guaranteed interest rate products with profit sharing (fonds euro)

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*Regulation (EU) No 1286/2014 of the European Parliament and of the Council on Key Information Documents for Packaged Retail and Insurance-based Investment Products*
Focus on the Key Information Document
Main information and timeline

- Maximum 3 A4 pages
- Stand alone document
- Consistent with marketing information

A person advising on, or selling, a PRIIP shall provide retail investors with the KID in good time before those retail investors are bound by any contract or offer relating to that PRIIP

- Regular review of the content.
- Revised version to be made available promptly.

- Easy to read, accurate and not misleading
- Should be available in the language of the retail investor

Timeline

- 5 April 2014: Adoption of final version of the regulation
- 30 June 2016: Publication of latest version of RTS
- 12 Sep 2016: Rejection of RTS by EU Council
- 8 Mar 2017: New RTS published
- 1 Jan 2018: Entry into force
- 1 Jan 2020: End of exemptions for UCITS
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- Current Challenges: Asset Managers
- Current Challenges: Banks and OTC Derivatives
PRIIPs impacts
PRIIPs affects Asset Managers differently depending on products and distribution model.
PRIIPs current challenges

Different actors - Different focus

Increase of the dependencies between the different actors

- **Clients**
  - Comparability between products
  - Increase the awareness on products characteristics

- **Distributors**
  - Increase training on products and related analytics, more specifically performance and costs data
  - Adapt the distribution process

- **Asset managers**
  - Data Quality
  - Availability of data
  - Calculation of transaction costs
  - Set-up of interfaces (EPT, CEPT, EMT)

- **Insurers**
  - Pressure on costs
  - Simplification and rationalization of products
  - Follow-up on underlying investment options
  - Maintenance of the documentation

- **Banks**
  - Data Quality
  - Availability of data
  - Set-up of interfaces (EPT, CEPT)

**To be considered**

- Need for a clear and detailed communication between the different industry players
- Importance to increase awareness of the asset managers/banks to the life insurance business
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Fair, clear and not misleading...
Take 1 – Regulator and Industry reaction

**FCA – 24th-Jan, 2018**
We understand some firms are concerned that, for a minority of PRIIPs, the ‘performance scenario’ information required in the KID may appear too optimistic and so has the potential to mislead consumers. **There may a number of reasons for this: the strong past performance of certain markets, the way the calculations in the RTSs must be carried out, or calculation errors.**

**ESMA – 20th-Jan, 2018**
The European Securities and Markets Authority, the pan-EU financial regulator, said the data were a “misinterpretation” and did not reflect the intended approach. It said regulators would “consider . . . additional guidance as issues arise”.
[Link here](#)

**EFAMA – December 2017**
The new rules are threatening to cause serious investor detriment by mandating figures, particularly in relation to performance and costs, that will at best confuse investors and at worst mislead them.
[Link here](#)
Fair, clear and not misleading...

Take 2 – explanatory notes

<table>
<thead>
<tr>
<th>Risk indicator</th>
<th>Lower risk</th>
<th>Higher risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 2 3 4 5 6 7</td>
<td>This risk indicator assumes you keep your shares for 5 years. The actual risk can vary significantly if you cash in your shareholding at an early stage and you may get back less than your original investment.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The summary risk indicator is a guide to the level of risk of this product compared to other products. It shows how likely it is that the product will lose money because of movements in the markets or because we are not able to pay you.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>We have classified this product as 3 out of 7 which is a medium risk class.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>This rates the potential losses from future performance at a high level and poor market conditions are very likely to impact your returns. The price at which shares in the Company are sold in the market has not historically tracked the Company’s net asset value per share.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The shares are denominated in US Dollars and not in a currency of a Member State of the European Union. The return when expressed in GB Sterling or Euro may change depending on the exchange rates between US Dollars on the one hand and GB Sterling and Euro on the other. Be aware of currency risk. This risk is not shown in the risk indicator shown above.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The whole amount of your invested capital in the Company is at risk and there can be no guarantee that you will get back any or all of the amount invested on a sale of shares in the Company.</td>
<td></td>
</tr>
</tbody>
</table>

**THE REQUIRED NOTES ON THE COMPANY PAYING YOU MONEY ARE MISLEADING. YOU’LL LIKELY RECEIVE SOME DIVIDENDS FROM THE COMPANY, BUT THE MAJORITY OF YOUR RETURN WILL COME FROM THE SALE OF YOUR SHARES WHEN YOU SELL.**
Fair, clear and not misleading...

Take 3 – Candid comments

I am a board director investment fund
You can receive material about the trust through its newly published key information document (Kid). But please, please, do not Google or download this document, And if you have received a hard copy, burn it before reading. Above all, keep it out of the hands of widows and orphans.
Each KID has been produced in accordance with strict legal guidelines (from the European Commission) using complex financial modelling entirely derived from historic share prices to arrive at risk and return figures. Each General Partner has followed these guidelines but makes no representation as to the utility of the resulting document, in particular, as is often pointed out, past returns from investments do not predict future performance.
Maintenance challenge: Annual update and other mandatory refreshes

KID Lifecycle overview

**Key requirements**

Annual update – every 12 months (after initial publication and thereafter 12 months after latest review)

Trigger management: Maintain process to identify “material changes” in the KID information (investment policy, SRI or expected returns, costs…)

Revision of the KID upon “trigger” detection (without undue delay)

Web publication 5 BD after revision
Data Exchange – Managing several files format

Two main file formats exist for data exchange:

- **EPT format**: developed by the European Working Group. The EWG initiative started in the frame of SII when the Asset Management industry was looking for a common solution to exchange data for transparency of funds (TPT files). With the arrival of PRIIPs / MIFID, the EWG decided to create additional templates EPT/EMT to facilitate transfer of data between the different actors involved within these regulations.

- **OpenFund Format**: This format was created initially by Fundinfo to enable the automated upload of information into its database. The format has been then enriched to cope with all the coming regulations.

The main differences between the 2 formats are

<table>
<thead>
<tr>
<th>EWG</th>
<th>Openfund</th>
</tr>
</thead>
<tbody>
<tr>
<td>101 fields</td>
<td>282 (constantly evolving)</td>
</tr>
<tr>
<td>1 EPT per language</td>
<td>1 EPT including all languages</td>
</tr>
<tr>
<td>1 reporting date,</td>
<td>1 reporting date + date referring to specific fields</td>
</tr>
<tr>
<td>used accross all the EPT</td>
<td></td>
</tr>
</tbody>
</table>
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  - Current Challenges: Performance Scenarios
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  - Current Challenges: Asset Managers
  - Current Challenges: Banks and OTC Derivatives
Performance scenarios
A summary..

1. **Performance Scenarios**

   - The problem with historical data - 2 year minimum history for daily, many adopting five years as best practice – bull market...

   - Or if less frequent than monthly valuations, estimate

   - When Recommended Holding Periods are less than 1 year

   - Cornish fisher, complex

   - Proxy data, distributing funds?
### Performance scenarios

**Looks good!**

#### Investment USD

<table>
<thead>
<tr>
<th>Scenario</th>
<th>What might you get back after costs</th>
<th>Average return each year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stress scenario</td>
<td></td>
<td>8,381.34 USD</td>
</tr>
<tr>
<td></td>
<td></td>
<td>-100%</td>
</tr>
<tr>
<td>Unfavourable scenario</td>
<td></td>
<td>9,256.14 USD</td>
</tr>
<tr>
<td></td>
<td></td>
<td>-100%</td>
</tr>
<tr>
<td>Moderate scenario</td>
<td></td>
<td>10,001.94 USD</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7.34%</td>
</tr>
<tr>
<td>Favourable scenario</td>
<td></td>
<td>10,632.29 USD</td>
</tr>
<tr>
<td></td>
<td></td>
<td>523456206 618.89%</td>
</tr>
</tbody>
</table>

*Source: ETFS Commodity Securities Limited ([Link](#))*
Performance scenarios
Overly Optimistic? Negative returns in all scenarios...

<table>
<thead>
<tr>
<th>Scenarios</th>
<th>What you might get back after costs</th>
<th>1 Year</th>
<th>2 years</th>
<th>3.46 Years (Recommended Holding Period)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stress scenario</td>
<td>What you might get back after costs</td>
<td>1 756.85</td>
<td>4 074.09</td>
<td>2 967.80</td>
</tr>
<tr>
<td></td>
<td>Average return each year</td>
<td>-82.43%</td>
<td>-36.17%</td>
<td>-29.61%</td>
</tr>
<tr>
<td>Unfavourable scenario</td>
<td>What you might get back after costs</td>
<td>6 360.60</td>
<td>4 626.74</td>
<td>3 016.80</td>
</tr>
<tr>
<td></td>
<td>Average return each year</td>
<td>-36.39%</td>
<td>-31.98%</td>
<td>-29.27%</td>
</tr>
<tr>
<td>Moderate scenario</td>
<td>What you might get back after costs</td>
<td>8 070.57</td>
<td>6 441.86</td>
<td>4 639.22</td>
</tr>
<tr>
<td></td>
<td>Average return each year</td>
<td>-19.29%</td>
<td>-19.74%</td>
<td>-19.91%</td>
</tr>
<tr>
<td>Favourable scenario</td>
<td>What you might get back after costs</td>
<td>9 875.46</td>
<td>8 649.56</td>
<td>6 880.02</td>
</tr>
<tr>
<td></td>
<td>Average return each year</td>
<td>-1.25%</td>
<td>-7.00%</td>
<td>-10.24%</td>
</tr>
</tbody>
</table>
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PRIIPS in the frame of the Unit-linked life insurance business

Various quality standards – Scan of internet

- PRIIPs KIDs on 4 pages – main reason is the translations in some languages
- Track changes still appearing on some documents
- Missing Risk indicator scale
- Mandatory regulatory narratives missing
- Cost table format that does not comply with the regulatory requirements
- Signature required on the KID as a proof that the policyholder has received a copy and that this copy is sufficient to allow comparison between products
PRIIPS in the frame of the Unit-linked life insurance business

Multi Option Product – MOP - model

Insurance products offer different type of investment options. The multi-option product approach is therefore suitable and explained as follows:

- A **Generic KID** that includes all investment options: there is a range of SRI (« Synthetic Risk Indicator »), range of fees (including fees from the insurance contract and underlying);
- A **mini-KID** or **Specific Information Document** related to each investment options. The UCITs KIID until 2020 is accepted.
PRIIPS in the frame of the Unit-linked life insurance business
Interaction behind MOP structure
Insurance Companies - Current challenges
Collection of data

More specifically it includes:

Availability of data
- Follow-up with Fund managers of UCITS, AIF, DPM, Structured product to get EPT and KIID/KID for their underlying options
- Specific issue with Discretionary mandates

Completeness and Correctness
- EPT files with various level of quality.
- Missing and incorrect data – Workaround by putting in place remediation plans
- Review of underlying options scope

Specific data needs
- UCITS funds must provide PRIIPs corresponding data
- DPAM must provide Proxies related to their mandate profiles
- UCITS KIIDs to be delivered in languages where the insurance product is distributed
Insurance Companies - Current challenges
Aggregation of data

- Management of RHP
  - Quick reactivity for including new products
  - Missing or incomplete data in the EPT that makes difficult the aggregation into the Generic KIDs
  - Align assumptions (RHP, costs, age of the insured persons, risk indicators)

- Structured products
  - Clarify treatment of incidental costs (performance fees and carried interest) in the Generic KID:
    - Not visible / n.a. in the Table 2 of costs
    - Included or not in the RIY
    - Data to be mentioned in EPT to be clarified

- Incidental costs

More specifically it includes:
- Aggregation of supports with different RHP
Insurance Companies - Current challenges

Maintenance cycle

More specifically it includes:

**Frequency**
- Frequency of data collection: depending on support? Others?
- Collection process to be streamlined, automated
- Management of large number of data – audit, traceability

**Thresholds management**
- Clarify threshold to be applied – subject to interpretation (materiality?)
- Re-Publication process to be simplified

**Review of options**
- Ensure the regular reception of underlying options data
- Control consistency over time of data received
Insurance Companies - Current challenges
Market places – difference in PRIIPs application

**Gold Plating**

- Data aggregation:
  - Calculation of ranges
    - On the overall scope of underlying options
    - On the MIN/MAX ranges
  - Aggregation of the product data into underlying

- Additional fields on bonds funds (Germany)
  - Weight, Duration, annualized Volatility

- Data on costs
  - Costs negotiated between insurer and UCITS fund manager
  - Publish average costs or maximum costs

- Direct lines: production of a mini-KIDs

**Notification of new/updated KIDs**

<table>
<thead>
<tr>
<th>Country</th>
<th>Notification</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Luxembourg</td>
<td>No</td>
<td>✗</td>
</tr>
<tr>
<td>France</td>
<td>No</td>
<td>✗</td>
</tr>
<tr>
<td>Belgium</td>
<td>Yes</td>
<td>✓ Specific platform</td>
</tr>
<tr>
<td>Germany</td>
<td>No</td>
<td>✗</td>
</tr>
<tr>
<td>Italy</td>
<td>Yes</td>
<td>✓ Mail sent by the insurer</td>
</tr>
<tr>
<td>Portugal</td>
<td>Yes</td>
<td>✓</td>
</tr>
<tr>
<td>UK</td>
<td>No</td>
<td>✗</td>
</tr>
<tr>
<td>Ireland</td>
<td>No</td>
<td>✗</td>
</tr>
</tbody>
</table>
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PRIIPs calculations...
A summary..

Transaction Costs

- Either greater than unit costs or sometimes negative
- Why negative?
  - Arrival price - explicit costs +\- implicit costs (market movement) - three different core calculations and several alternatives.
  - Anti-dilution levy
- Manufacturers not required to disclose which methodologies – four broad alternatives for transaction costs
- Studies have shown transaction costs ranging from -0.50% to +2% for the same investment portfolio depend on the methodology and market data employed.
- Press coverage treat them like they are hidden costs- note press coverage of low cost trackers when transaction costs were revealed:
  [https://www.moneymarketing.co.uk/mifidii-transaction-costs-funds/](https://www.moneymarketing.co.uk/mifidii-transaction-costs-funds/)
Transaction costs under PRIIPs

PRIIPs RTS requires transaction costs be the sum of:

Explicit costs

- Brokers fees, research costs paid by the clients, taxes, etc.

Implicit costs

For existing PRIIPs (>3y):

Standard Approach - Comparison of the arrival price with the price when the transaction decision was made.

For existing PRIIPs (<3y):

Actual portfolio turnover rate per asset class multiplied by the bid-ask spread of the representative of that asset class + arrival price after six months

For new PRIIPs:

Estimated portfolio turnover rate per asset class multiplied by the half bid-ask spread of the representative of that asset class

Anti-dilution proceeds

The PRIIPs methodology allows a reduction of the transaction costs by the proceeds of anti-dilution mechanism that cover the transaction costs resulting from subscriptions or redemptions.
Transaction costs – alternatives
What is the cost?

**Alternatives for arrival price**

1. Arrival price: RTS Annex VI Para 12(a) For each purchase undertaken by the PRIIP, *the price of the instrument at the time the purchase order is transmitted to another person for execution (the purchase ‘arrival price’) shall be subtracted from the net realised execution price of the transaction. The resulting value shall be multiplied by the number of units purchased*;

2. **OR...Use same day opening or prior day closing price** (RTS Annex VI Para 15) *Where information about the time when the order to transact is transmitted to another person is not available (or not available to a sufficient level of accuracy), or where information about the price at that time is not available, it is permissible to use as the arrival price the opening price of the investment on the day of the transaction or, where the opening price is not available, the previous closing price. When calculating transaction costs using data prior to 31 December 2017, intra-day prices may be considered as not available.*
Negative transaction costs using opening price as “arrival price”
A simplified illustration – a divergence from identifiable costs

PRIIP manufacturer (fund manager) buys one Vodafone share at close, market price declines during the day

**Opening (Arrival) price**
£210.45

**Actual purchase price**
£207.20

**Purchase - Arrival Price methodology (Para 15)**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actual purchase price</td>
<td>£207.20</td>
</tr>
<tr>
<td>Less actual commission (est 20bps)</td>
<td>£0.41</td>
</tr>
<tr>
<td>Net realised execution price</td>
<td>£206.79</td>
</tr>
<tr>
<td>Less Arrival (opening price)</td>
<td>£210.45</td>
</tr>
<tr>
<td>Transaction cost</td>
<td>-£3.66</td>
</tr>
</tbody>
</table>

**New PRIIPS (Para 21)**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actual purchase price</td>
<td>£207.20</td>
</tr>
<tr>
<td>Less &quot;New PRIIPs&quot; spread (est 15bps)</td>
<td>£0.31</td>
</tr>
<tr>
<td>&quot;New PRIIPS Net realised execution price&quot;</td>
<td>£206.89</td>
</tr>
</tbody>
</table>

Explicit transaction costs:
£0.41
Transaction costs calculation under PRIIPs
Market figures are still dispersed and may evolve in the coming months
Fair, clear and not misleading...
Take 6 – What is the Reduction in Yield? At least two ways of calculating...

<table>
<thead>
<tr>
<th>Investment £ 10,000 through an Offer of Subscription Scenarios</th>
<th>If you cash in after 1 year</th>
<th>If you cash in after 3 years</th>
<th>If you cash in after 5 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total costs</td>
<td>£ 581.76</td>
<td>£ 1,054.57</td>
<td>£ 1,591.83</td>
</tr>
<tr>
<td>Impact on return (R/Y) per year</td>
<td>5.42%</td>
<td>3.40%</td>
<td>3.00%</td>
</tr>
</tbody>
</table>

Composition of costs
The table below shows the impact each year of the different types of costs on the investment return you might get at the end of the recommended holding period and the meaning of the different cost categories.
This table shows the impact on return per year

<table>
<thead>
<tr>
<th>One-off costs</th>
<th>Entry costs</th>
<th>0.50%</th>
<th>The impact of the costs you pay when entering your investment. This is the most you will pay, and you could pay less and is based on a 2.5% entry cost spread over the 5 year recommended holding period.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Exit costs</td>
<td>0.00%</td>
<td>The impact of the costs of exiting your investment.</td>
</tr>
<tr>
<td>Ongoing costs</td>
<td>Portfolio transaction costs</td>
<td>0.00%</td>
<td>The impact of the costs of us buying and selling underlying investments for the product.</td>
</tr>
<tr>
<td></td>
<td>Other ongoing costs</td>
<td>2.03%</td>
<td>The impact of the costs that we take each year for managing your investments.</td>
</tr>
<tr>
<td>Incidental costs</td>
<td>Performance fees</td>
<td>0.00%</td>
<td>The impact of the performance fee.</td>
</tr>
<tr>
<td></td>
<td>Carried interests</td>
<td>0.00%</td>
<td>The impact of carried interests.</td>
</tr>
</tbody>
</table>
Summary Risk Indicators
Apples to apples? Mixing UCITS and PRIIPs methodologies for Insurance firms

- PRIIPs SRI tends to be lower than UCITS SRRI for the same volatility/product
PRIIPs current challenges

Difference of treatment between UCITS KIID vs. PRIIPs KID vs. MIFID II

<table>
<thead>
<tr>
<th></th>
<th>MIFID II</th>
<th>PRIIPs (KID)</th>
<th>UCITS (KIID)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Format</strong></td>
<td>Expressed in monetary and percentage terms</td>
<td>Expressed in monetary and percentage terms</td>
<td>Expressed in percentage terms</td>
</tr>
<tr>
<td><strong>Methodology</strong></td>
<td>Ex-ante and ex-post</td>
<td>Ex-ante and ex-post</td>
<td>Ex-post</td>
</tr>
<tr>
<td><strong>One-off charges[1]</strong></td>
<td>To be disclosed</td>
<td>To be disclosed as effect on return</td>
<td>To be disclosed as % of invested amount</td>
</tr>
<tr>
<td><strong>On-going charges[2]</strong></td>
<td>To be disclosed</td>
<td>To be disclosed</td>
<td>To be disclosed</td>
</tr>
<tr>
<td><strong>All costs related to the transactions[3]</strong></td>
<td>To be disclosed</td>
<td>To be disclosed</td>
<td>Don’t have to be disclosed</td>
</tr>
<tr>
<td><strong>Incidental costs[4]</strong></td>
<td>To be disclosed</td>
<td>To be disclosed</td>
<td>To be disclosed</td>
</tr>
<tr>
<td><strong>Cost and charges to be aggregated</strong></td>
<td>All above mentioned costs</td>
<td>All above mentioned costs</td>
<td>No aggregation required</td>
</tr>
<tr>
<td><strong>Cumulative effect of costs on the return</strong></td>
<td>To be disclosed</td>
<td>To be disclosed</td>
<td>N/A as no aggregation required</td>
</tr>
</tbody>
</table>
### PRIIPs current challenges

#### Maintenance cycle

<table>
<thead>
<tr>
<th></th>
<th>UCITS KIID</th>
<th>PRIIPs KID</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SR(R)I</strong></td>
<td>Reference period: 4 months</td>
<td>- Reference period of 4 months if change due to MRM</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- After change due to CRM</td>
</tr>
<tr>
<td>Moderate performance scenario</td>
<td></td>
<td>5 percentage points variation</td>
</tr>
<tr>
<td><strong>Cost over time</strong></td>
<td>Variation of 5% (Market practice)</td>
<td>UCITS practice used (Market practice)</td>
</tr>
<tr>
<td><strong>Composition of costs</strong> (excluding entry / exit costs)</td>
<td>Variation of 5% (Market practice) and at each change</td>
<td>UCITS practice used (Market practice)</td>
</tr>
<tr>
<td><strong>Entry and exit costs</strong></td>
<td></td>
<td>UCITS practice used (Market practice)</td>
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<tr>
<td><strong>Narratives and templates</strong></td>
<td></td>
<td>UCITS practice used (Market practice)</td>
</tr>
<tr>
<td><strong>Minimum revision frequency</strong></td>
<td>Annual Mid-February (Market practice)</td>
<td>At least every 12 months after the last publication date</td>
</tr>
</tbody>
</table>
Agenda

- Introduction: The PRIIPs framework
- PRIIPs: Impact
- Current Challenges
- Current Challenges: Performance Scenario
- Current Challenges: Insurance
- Current Challenges: Asset Managers
- Current Challenges: Banks and OTC Derivatives
Banks - Structured products and OTC Derivatives
Current challenges

• Illustrative trade versus bespoke

• De-scoping – many banks realised late in the day that they were distributing to retail de-scoped.

• FX Forward, 1 year tenor - So many assumptions that multiple versions of the same trade exist with different performance scenarios

• Capital markets transactions
Illustrative trade v Trade specific

European Commission perspective - Where are the boundaries between KID information and individual contractual information?

- EC has indicated that KIDs are not intended to be trade specific
- ESMA PRIIPs QA (20-Nov-2017) states: “it could be acceptable, to draw up a single KID for a class or group of OTC derivatives that share the same relevant product characteristics”

- Where are the boundaries between KID information and individual contractual information?
Thank you very much for your attention!