Dear Client,

On Friday March 5<sup>th</sup>, the FCA made an <u>official statement</u> on the end of LIBOR, ratifying the proposal initially set forth in the IBA consultation introduced on Nov 30<sup>th</sup>, 2020. Taken directly from the FCA's website:

The FCA has confirmed that all LIBOR settings will either cease to be provided by any administrator or no longer be representative:

- immediately after 31 December 2021, in the case of all sterling, euro, Swiss franc and Japanese yen settings, and the 1-week and 2-month US dollar settings; and
- immediately after 30 June 2023, in the case of the remaining US dollar settings

## What this means for the IBOR Transition:

- Dates confirmed all technology & operational readiness activities must be completed as soon
  as practicable, and by December 31, 2021 at the latest. Markets will dictate volume in alternative
  reference rates (ARRs; SOFR, etc.) over the course of 2021
- New contracts As expected, LIBOR benchmarks are NOT to be used in any new origination after Dec 31, 2021 (all tenors & currencies)
- Legacy contracts Re-planning activities can now be finalized; activities for contract remediation on USD LIBOR positions can extend into 2022 2023, however market liquidity in ARRs & client demand for those benchmark rates will dictate the pace of the transition
- Fallback Rates Spread adjustments which will be used in IBOR fallback language <u>have been fixed as of March 5, 2021</u> as a result of the announcement. This may help liquidity in various ARRs, as it creates a defined correlation to LIBOR.
- **Synthetic LIBOR** The IBA and FCA will consult on the publication of a 'synthetic LIBOR' for some currencies and tenors which expire in Dec 2021. This will be to reduce the risks associated with tough legacy contracts. Any synthetic LIBOR will be considered "non-representative" and is not to be used for new originations

## References:

FCA Statement
IBA Statement
ISDA Announcement
Bloomberg Notice on spread adjustments
BMO Notice to Clients for Certain Lending Agreements (March 5, 2021)