

Frequently Asked Questions (FAQ)



What is a Benchmark Rate?

Benchmark Rates are used in financial transactions throughout our economy, for example, to calculate interest rates for loans.

What are IBORs?

Interbank Offered Rates represent an estimate of how much it would cost a bank to borrow money from other banks. IBORs are published in several currencies and for a variety of interest periods.

What is LIBOR?

The London Interbank Offered Rate. This is calculated from estimates submitted by a selection of banks in London.

What are Alternative Reference Rates (ARRs)?

They are benchmark rates which are being developed as an alternative to IBORs.

Why are IBORs being replaced?

IBORs are based on forward looking estimates of how much it costs for a bank to borrow money from other banks in the interbank lending market. The activity in this market has been declining gradually. ARR, such as Risk Free Rates, are being introduced because they are based on transactions which have already taken place in markets which are very active, making them more accurate and robust.

What are Risk Free Rates?

Risk Free Rates are a type of ARR. They are overnight rates, based on transactions which have already taken place.

How are Risk Free Rates different to IBORs?

Risk Free Rates are based on information from transactions which have already taken place. They will therefore be less reliant on the judgement of banks, and therefore called "Risk Free".

When do the changes to IBORs come into effect?

ARRs for LIBOR need to be in place by 31 December 2021. A timeline for having ARR for EURIBOR is unclear at this time.

What is SONIA?

The Sterling Overnight Index Average which is the new Risk Free Rate for Sterling transactions.

What is SOFR?

The Secured Overnight Financing Rate which is the new Risk Free Rate for US Dollar transactions.

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What is €STR?

The Euro Short Term Rate which is a new Risk Free Rate for Euro transactions.

What is EURIBOR and how is it changing?

The Euro Interbank Offered Rate. EURIBOR has been reformed to meet the requirements of the EU Benchmarks Regulation, to include in its calculation, information based on transactions that have already taken place. €STR may replace EURIBOR in the future, however it is likely that in the short term, banks will continue to use EURIBOR.

Are all Banks impacted?

All banks which offer products based on IBOR rates are impacted.

What are we doing to get ready for this change?

We are monitoring this situation and will provide customers with further information as things progress and share updates and guidance on a regular basis.

What does this mean for me?

If you have a contract with us that relates to an IBOR, this might need to be amended at some stage in the future. If this is the case, we will communicate with you.

What if I am unsure about these changes?

Should you wish to discuss the impact of IBOR transition on any of the products you hold with us, please contact us as outlined below.

If you are in any doubt as to the impact of these reforms, you are encouraged to seek independent advice (legal, financial, tax, accounting or otherwise), from your own professional advisors, based on your own particular circumstances.

What are the next steps?

Whether you are taking out a new product, or you are an existing customer, we are making you aware that IBOR transition will require us to make changes to products and documents. In either case, whether you are taking out a new product, or you are a new customer, if you are affected by these changes we will communicate with you.

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New FAQs for March 2020

How is IBOR transition being guided by regulators?

In 2017, the Financial Conduct Authority (FCA) announced that they would no longer compel panel banks to submit quotes for LIBOR beyond the end of 2021. Since this announcement the FCA have provided guidance to banks to assist them with the transition from IBORs to ARR. The FCA has been assisted in this task by the Bank of England (BoE) and the working group on Sterling Risk Free Rates (RFRWG), which is a subset of the BoE.

The purpose of the transition to ARRs is to more accurately reflect the current interbank market activities. As a consequence, several industry bodies and private and public sector working groups have been established in various countries to choose suitable ARRs and to provide guidance to banks to help them with the transition.

Does this change only affect GBP LIBOR products?

No. While GBP LIBOR, which seeks to measure lending in sterling on the London interbank market, is a widely recognised benchmark rate, IBORs are available to measure interbank lending in lots of other currencies, for example US Dollar.

What are regulators advising banks in order to assist IBOR transition?

In November 2019, the Risk Free Rates Working Group (RFRWG) set an objective for banks and other financial providers that no new GBP LIBOR based cash products, such as loans, maturing after 31 December 2021, are to be entered into after 30 September 2020. In April 2020, in light of the impact of Covid 19, this has been extended to 31 March 2021.

This means that from this date, it is unlikely that banks will be able to offer customers LIBOR as an interest rate on their loans. The FCA and the BoE both fully support this recommendation from the RFRWG.

What is AIB doing based on the new Bank of England guidance?

We will work towards meeting the objectives set by regulators. We are also working on a strategy so we can offer a new product based on ARRs.

What options are being proposed for new products and when will they be in place?

We are currently working on both a new product strategy, and a plan to transition existing customers with contracts linked to LIBOR to ARRs, such as an RFR. We will provide an update once a path has been clearly established.

How will my IBOR contract be changed to one which incorporates an RFR?

This will depend on the kind of product you hold with us and the terms of your contract. You should review your documents carefully and seek independent advice (legal, financial, tax, accounting or otherwise), from your own professional advisors, based on your own particular circumstances. The amendment process may be different for each product type. If you are affected we will contact you.

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New FAQs for September 2020

What will the outcome be for transition away from LIBOR?

The Bank of England have stated that steps should be taken to ensure customers have been treated fairly when replacing LIBOR. This means that LIBOR discontinuation should not be used to move customers with continuing contracts to replacement rates that are expected to be higher than what LIBOR would have been, or otherwise introduce inferior terms. The regulator also states that firms receiving LIBOR-linked interest are not expected to give up the difference between LIBOR and SONIA. Both of these factors must be considered as part of the move to SONIA.

Will there be any changes to the terms of my current documentation?

Depending on the expiry date of your current documentation, we may need to make a change to bring it into line with the new SONIA benchmark. If you are affected your Relationship Manager will be in touch over the coming months.

Who will bear the cost of repapering legal documentation?

As its possible that both AIB and its customers are likely to incur legal costs, these will be paid by each individual party.

How do I know if these changes will affect me?

These changes affect customers with products that reference LIBOR. If changes to documentation are required, your Relationship Manager will be in touch.

What options are available for customers who are transitioning away from LIBOR?

The default option will be SONIA, but there will also be an option for a fixed rate in some cases, subject to AIB internal approval. If you are in any doubt as to the impact of these reforms, you are encouraged to seek independent advice (legal, financial, tax, accounting or otherwise), from your own professional advisors, based on your own particular circumstances. The rate options available to each customer will be on a case by case basis. Each customer will have their products reviewed by the Relationship Manager, and they will be in touch to discuss this with you.

Will the new calculation affect my interest payment date?

No, this will remain as previously agreed.

Where can I go for more information?

IBOR.QUERY@aib.ie or your Relationship Manager

In addition the following websites may be useful:

UK

<https://www.bankofengland.co.uk/>

Europe

<https://www.ecb.europa.eu/home/html/index.en.html>

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Any terms set forth herein are intended for discussion purposes only and are subject to the final terms as set forth in separate definitive written agreements. This guide is not a commitment or firm offer and does not oblige us to enter into such a commitment, nor are we acting as a fiduciary to you.

Any transaction which you may enter into with AIB will be on the basis that you have made your own independent evaluations, without reliance on AIB, and based on your own knowledge and experience and any professional advice which you may have sought in relation to all aspects of the transaction including, without limitation, legal, accounting and/or tax advice.

Recipients of this guide should be aware of statements made by the Financial Conduct Authority and other international regulators, that LIBOR will cease to be published between now and the end of 2021. We encourage you to understand how the provisions of your product(s) with AIB and any linked products will operate should LIBOR or other applicable benchmarks be discontinued, have their use restricted, if any published benchmark rate ceases to be in customary market usage, or if there are changes to the way in which the benchmark is calculated, and bear in mind that amendments to your contract and any contract for linked products may be required in the future.

AIB cannot give any assurances that LIBOR or any other benchmarks will continue to be published or give any assurances as to the likely impact (including on the value, price or performance of your product), costs or expenses associated with any resulting transition. If you are in any doubt as to the impact of these reforms, you are encouraged to seek independent advice (legal, financial, tax, accounting or otherwise), from your own professional advisors, based on your own particular circumstances.

In no event will AIB be liable to you or any third party for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising whether in contract, tort (including negligence), breach of statutory duty, or otherwise, arising out of, or in connection with, your use of (or failure to use) any information provided in this document.

We encourage you to keep up to date with the latest regulatory and industry developments in relation to IBOR transition and to consider its impact on your business. You should consider, and continue to keep under review, the potential impact of IBOR transition on any existing product you have with AIB, any new product you enter into with AIB, and any other products you hold.