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Questions and answers (Q&A) on the PRIIPs KID

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Acronyms and definitions used

AIF	Alternative Investment Fund
CCP	Central Counterparty
CDS	Credit Default Swap
CRM	Credit Risk Measure
ETD	Exchange traded derivative
IPO	Initial Public Offering
KID	Key Information Document
MOP	Multi-option Product
MRM	Market Risk Measure
MTF	Multilateral Trading Facility
NAV	Net Asset Value
OTC	Over The Counter
PCA	Principal Component Analysis
PRIP	Packaged Retail Investment Product
PRIIP	Package Retail and Insurance-based Investment Product
Q&A	Question and Answer
RIY	Reduction in Yield
SRI	Summary Risk Indicator
UCITS	Undertakings for Collective Investment in Transferable Securities
VaR	Value-at-risk
VEV	VaR-Equivalent Volatility

General topics [Last update 20 November 2017]

1. **Does the categorisation of a retail investor depend on the definition in Directive 2014/65/EU?**

   Yes, in accordance with Article 4(6) of the PRIIPs Regulation.

   It is noted that in addition to the categories of “professional clients” and “retail client” in Directive 2014/65/EU a number of Member States have introduced further categories (such as “qualifying investor”, “informed investor”, or “semi-professional investor”) which, by their definition, share some, but not all elements of the definition of “professional client” pursuant to Point 10 of Article 4(1) of Directive 2014/65/EU. The obligation in the PRIIPs Regulation to provide a KID extends to all investors that do not meet the criteria laid down in Annex II of Directive 2014/65/EU, irrespective of any additional categorisation provided for in national law.

   (Published 18 August 2017)

2. **Is a KID always required when an investment product is listed on a regulated market?**

   A manufacturer is not required to draw up a KID for a product listed on a regulated market when they have defined the product as meant only for non-retail investors

   (Published 20 November)

3. **The Delegated Regulation uses terms “biometric risk premium” and “insurance premium”. Do these terms have the same meaning?**

   The Delegated Regulation defines the term “biometric risk premium” in point 54 of Annex VI. The term “insurance premium payment” in the second sub paragraph of Article 2(4) and the term “insurance premium” at the top of Templates A and B of Annex V - Single or Regular premiums paid – are considered to have the same meaning as biometric risk premium.

   It can be added that some of the references to “premiums” in the Delegated Regulation, for example in the first sub paragraph of Article 2(4) the terms “overall premium”, “premium” or “annual premium”, refer to the total amount paid or total annual payments made by the retail investor. The term “Investment” at the top of Templates A and B of Annex V – Single or Regular premiums paid - also refers to the total amount paid or total annual payments.

   (Published 20 November)

Market risk assessment (Annex II, Part 1)

I. Product categories [Last update 20 November 2017]

1. **Will it be possible for the manufacturer to include certain products, such as leveraged products, voluntarily in "Category 1" for the purposes of the market risk assessment?**

It is not possible to voluntarily include a PRIIP in any Category. The analysis of the appropriate categorisation must be done. For example, leveraged products that could lead retail investors to lose more than their initial investment would be Category 1. Other types of leveraged products, for example those that track a reference value that cannot fall below zero, may be Category 2 or 3.

(Published 4 July 2017)

2. **The main difference between Category 2 and Category 3 is whether the condition of "constant multiple" is fulfilled in Annex II, Part 1, Point 5. Would it be correct to treat unit-linked insurance products with minimal fees charged by the insurer (or absolute fees or fees depending on value) as not fulfilling the definition of "constant multiple" and therefore belonging to Category 3?**

The categorisation referred to in Annex II concerns the MRM of the product. Annex VI and VII concern the calculation and presentation of costs or fees. For insurance-based investment PRIIPs which do not fall into Category 4, the categorisation depends only on the characteristics of the payoff of the PRIIP and the availability of data. It does not depend on the nature of the charges.

(Published 4 July 2017)

3. **Are PRIIPs with unconditional capital protection categorised as Category 2 or Category 3?**

If there is an unconditionally protected amount this usually indicates a non-linear PRIIP and therefore Category 3 or 4 is more likely. In this case, in accordance with Points 24 and 29 of Annex II, Part 1, the MRM may be calculated by discounting the protected amount to get the (97,5%) VaR.

(Published 4 July 2017)

4. **Would a hedge fund that meets the following criteria be considered a Category 1 or Category 3 PRIIP? The criteria are: the hedge fund invests in transferable securities, these transferable securities are valued daily, the hedge fund has quarterly (or less frequent) redemption right, hedge fund is able to use leverage.**

A determination as a Category 1 PRIIP overrules the other categories; thus where a PRIIP satisfies the conditions for a Category 1 PRIIP it shall be classified as a Category 1 PRIIP irrespective of whether it also meets the conditions of another category. The historic availability of price data relates to the frequency of the calculation of the NAV, not the frequency of redemption rights. That means it is a Category 3 PRIIP if there is sufficient historic data from the hedge fund or a benchmark available.

(Published 4 July 2017)

5. **It appears that unit-linked insurance products without guarantees would fall into Category 2. However cost-profit-participation and risk-profit-participation is not reflected in the market values or the Cornish-Fisher methodology. Please provide guidance on how this is to be taken into account.**

Pure unit-linked insurance products, i.e. those which do not have a profit participation mechanism and do not depend on other factors that are unobserved in the market, would fall into categories 1, 2 or 3 depending on the nature of the product´s payoff and the availability of data.

The same unit-linked product may offer units backed by different investment propositions (funds, structured instruments, etc.) that fall into different categories, (e.g. some being Category 2, whilst others being Category 3); separate Risk Indicators would be displayed for these different units.

In the cases of cost and risk profit participation described, the PRIIP or the units offered – depending at what level the participation is occurring -- would not be Category 2, but Category 4. The cost-profit or risk-profit participation is considered an unobserved factor in the market, therefore resulting in the PRIIP being Category 4. Points 25 to 29 of Annex II, Part 1 describe the methodology for calculating the VEV of the part of the PRIIP that depends wholly or partly on factors that are unobserved in the market.

(Published 4 July 2017)

6. **What is the meaning of the term "underlying investments" in Annex II, Part 1, Points 4-6 for a PRIIP that is an Undertaking for Collective Investment (UCI)? In particular, do we need to look at the portfolio of the UCI itself to determine which Category we should consider the PRIIP?**

The determination of the PRIIPs' Category addresses the PRIIP itself, and depends on the pay-off structure and the availability of data. If the pay-off of the UCI is linear, it would be classified as Category 2 provided there is enough data available for the calculation. If there is no data, it would be Category 1. If the pay-off is not linear (for example a structured UCITS), it would be a Category 3 product, provided the data history requirements are met.

(Published 4 July 2017)

7. **For PRIIPs that allow for investment in underlying instruments of a different nature, which are classified in different groups for risk calculation, how should the Summary Risk Indicator (SRI) be calculated? For instance, if the PRIIP that is a fund invests in non-linear instruments that are not material at portfolio level or that do not induce a non-linear payoff for the fund? The reason for the question is that Commission Delegated Regulation indicates the methodology for the calculation of the single underlying and not the combination.**

   It can be helpful to make a distinction between those PRIIPs that allow for investment in underlyings of a different nature because they are for example an Undertaking for Collective Investment or a structured product, and those PRIIPs that allow for the retail investor to invest in different types of underlyings of their choosing (i.e. multi-option products).

   For the first type of PRIIP described above the categorisation for the purposes of the market risk assessment depends on the overall PRIIP pay-off structure of the portfolio as a whole, and not on the underlyings as such. In the two cases mentioned in the question the PRIIP would be classified as Category 2. Where a PRIIP includes a material exposure to a non-linear underlying financial instrument and a linear one, and that, as a consequence, the combined pay-off structure is materially non-linear (e.g. a PRIIP delivers an overall return equal to the upside of an index above a given strike, then the PRIIP would be Category 3).

   For multi-option products, the categorisation may be different for different units offered. The KID for the MOP itself (the generic KID) would include a range of SRI classes in accordance with Article 12(1)(a), but not the range of categorisations.

   (Published 4 July 2017)

8. **In Annex II, Part 1, Points 9 and 10 it states that the minimum observation frequency is monthly but subsequently it is specified that in the event of bi-monthly publication of prices the frequency will be bi-monthly. Is that not contradictory? Further, in Point 10, no minimum history is explicitly mentioned for bi-monthly prices.**

   It is important to clarify that bi-monthly means that prices are available twice a month (to avoid confusion with every 2 months), so that is more frequent than the minimum monthly frequency. Regarding Point 10, where prices are not available on a weekly basis, but are available on at least a monthly basis (i.e. also including where they are available on a bi-monthly basis), the minimum data history is 5 years.

   (Published 4 July 2017)

9. **How should the requirement to use data of an appropriate benchmark/proxy be interpreted where there is no, or insufficient, price data for the PRIIP or the underlying value. For example:**

- **Would an open end structured product linked to the performance of a newly issued stock automatically qualify as a Category 4 PRIIP?**
- **Would it change its Category during the tenor (into Category 2/3) once enough prices are available?**
- **Do you agree that Point 14 of Annex II may also be applied for new funds or funds with daily observation of return lower than 2 years.**

When insufficient price data for the PRIIP or its underlying asset are available, data of an appropriate benchmark or proxy should be used. Such a PRIIP should not be assigned to a different Category unless no appropriate benchmark or proxy exists, in which case it shall be classified as a Category 1 PRIIP and a default MRM (MRM 6) will be assigned. The availability of data has no bearing on the applicability of Point 14 of Annex II. The MRM of a PRIIP based on a newly issued stock should be computed using an appropriate benchmark or proxy if available, until there is enough real data of the new stock. The Category of such a product then will not change once sufficient data becomes available.

More specifically, in relation to the sub-questions above:

- No – it would be a Category 3 PRIIP, though the simulation would require using the returns of a suitable proxy.
- No – it is a Category 3 PRIIP.
- Yes Point 14 may be applicable, but it depends on the nature of the investment policies or strategies and not on the availability of data. Point 14 can apply to new funds (and equally to funds with sufficient data history), but the requirements regarding sufficient data history or the use of a suitable benchmark or proxy still apply.

(Published 4 July 2017)

10. **Is the provision in Annex II, Part 1, Point 14 (b) applicable where a fund has sufficient history? This is particularly relevant to multi-asset funds; it would be misleading to put these products in Category 1 (thus MRM class 6), whereas most often, they would actually fall into MRM class 2 or 3.**

The same requirements apply to products to which Point 14 applies as to other products in general as regards the case where there is insufficient data, where a benchmark should be used. If there is no appropriate benchmark or proxy the minimum data requirements will not be satisfied and the PRIIPs will be categorised as 1.

Point 14(b) relates specifically to the case where there has been a revision (that is a material change) to the investment policy (not, that is, simply a rebalancing of asset allocations according to an existing investment policy). The portfolio composition of "life cycle funds", for example, changes substantially over time usually becoming more defensive by switching from equity to fixed income assets. This means that not all of the return history of the fund may be representative of the fund's current overall risk profile. Therefore, the data history requirements in Point 5 or 6 may be met, but part or all of that history may no longer be relevant for the fund due to a revision of its investment policy. In this case the actual fund data history is not used for the VEV calculation, and instead the maximum of Points 14 (a) (ii) and (iii) should be used. This would not involve a re-categorisation of the PRIIP into Category 1.

(Published 4 July 2017)

11. **Can an appropriate benchmark or proxy continue to be used once sufficient data becomes available?**

It is not possible to use an appropriate benchmark or proxy where sufficient market data is available for the PRIIP. However, where market data is available only for a part of the period used for the calculation, the available market data should be concatenated with the relevant price data of an appropriate benchmark or proxy (for example where monthly market data of the PRIIP is available, it should be concatenated with monthly market data of the benchmark or proxy). Once sufficient market data of the PRIIP becomes available to complete the data series, that data should be used in its entirety rather than the data of the benchmark or proxy.

(Published 18 August 2017)

12. What is meant by factors not observed in the market as stated in Annex II, Part 1, Point 7?

Category 4 products are those where the value depends, at least in part, on factors not observed in the market. That is, the value is not calculated using market prices of underlyings but depends to some extent on decisions of the manufacturer which are not triggered automatically by external factors. In insurance, a typical example mentioned in the Delegated Regulation is with-profit insurance contracts that distribute to retail investors a portion of the manufacturer's profits.

Structured products which depend on multiple underlying securities should not be classified as Category 4 due to the impact of the correlation. These products are expected to be either Category 1 or 3 depending on the availability of data.

(Published 18 August 2017)

13. How should credit-linked notes be treated, for example which is their product category for the purposes of the MRM calculation?

The Delegated Regulation does not in general address the treatment of specific product types, and for credit-linked notes the contractual arrangements for each product would need to be assessed on a case-by-case basis, to identify the applicable category and the methodology for this category would then be applied.

However, some guidance can be given in relation to how the Delegated Regulation can be applied to instruments that pay a periodic coupon to the investor until either maturity or the default of a reference entity.

First, in accordance with Annex II, Part 1, point 4(c), where there is not sufficient historical data the product shall be considered a Category 1 product, and hence the MRM is 6. For example, if a product depends, on the default of multiple entities, there may not be observable correlations for a joint default.

Where there is market data, for example CDS prices that give a market based estimate of the probability of default for a particular reference entity, these products may be Category 3 and the corresponding methodology for the risk and performance calculations would apply.

Credit events are not considered to be “factors not observed in the market” (see also Q&A no. 12, Section MRM, 1. Product Categories), and therefore Category 4 is not considered to be applicable.

(Published 20 November 2017)

II. MRM class determination [Last update 20 November 2017]

1. **The MRM class determination for Category 3 PRIIPs, as specified in Annex II, Point 16, states that the "[…] VaR shall be the value of the PRIIP at the 97.5% confidence level […]". Since the formula in Annex II, Point 17 can only be reasonably applied for a value of VaR between 0 and 1, please clarify that the VaR in this formula shall be the ratio of the value of the PRIIP at the 97.5% confidence level and the initial value of the PRIIP according to the proposed methodology?**

   The VaR is calculated from the ratio of the value at a 97.5% confidence level and the amount invested in the PRIIP (as this represents the potential loss to the investor). This is stated in Annex II, Part 1, Point 1.

   (Published 4 July 2017)

2. **Does the formula in Annex II Point 17 use the simulated value of the PRIIP divided by its initial value? Should the calculation of VEV post-issuance be based on the ratio of the simulated value divided by its initial value, or the ratio of the simulated value divided by the current value of the PRIIP? We would expect that the current value seems more appropriate.**

   When calculating the VEV, the ratio should reflect either the initial price to be paid at the time of the first production of the KID, or the price at the point of the review and revision of the KID. The VaR that is used to calculate the VEV is specified under Point 1 of Annex II as 'the percentage of the amount invested that is returned to the retail investor', and is a reference to a rate of return based on the value of units in the PRIIP at the point at which the KID is being prepared.

   In more general terms, it should be stressed that the figures to be shown in the KID, are presented according to a standardised and comparable starting point (for most PRIIPs 10 000 EUR according to Annex VI Point 90).

   (Published 4 July 2017)

3. **For products with an automatic early-redemption feature, the holding periods might differ for each of the simulations. What value of T, related to the formula for the calculation of the MRM, the length of the recommended holding period, should be chosen?**

   The recommended holding period should not be confused with the T (Time) to be used in the conversion of the VaR into a volatility.

   When performing a set of simulations, the exact holding time (T) associated with the 97.5% confidence level can be identified. That is the time to be used in the conversion instead of the recommended holding period.

   It can be noted that any contract with an early redemption feature will be either a Category 3 or a Category 4 product and will require simulations.

   (Published 4 July 2017)

4. **The principal component analysis of Annex II, Point 23 ensures the consistent simulation of curves. Is it mandatory to use this method also for PRIIPs that depend on only one interest rate underlying, e.g. bonds with yearly coupons of max (12m EURIBOR + 0.5%, 0.3%)?**

   A PCA is required whenever an interest rate or interest rates are observed at multiple times in the future. The purpose of the PCA is to capture the correlation between interest rate movements at different points of time in the future. In the example given a PCA would be needed.

   (Published 4 July 2017)

5. **Are we right to assume that the bootstrapping of equity baskets should also be based on a principal component decomposition (at least for baskets of more than two underlyings)? On which rule should the dimension of the resulting factor model be based (dimension 3 as in the curve case could be too small)?**

   A principal component analysis is not needed for equity baskets.

   (Published 4 July 2017)

6. **What is meant by unconditional protection of the capital (e.g. Point 24 of Annex II)?**

   This means that irrespective of market movements the amount invested in the PRIIP is protected up to a prescribed level. The term refers only to market risk and therefore excludes losses in relation to the obligor's default (i.e. credit risk).

   (Published 4 July 2017)

7. **A fully protected product can be allocated to MRM 1. Is this still the case if the underlying assets do not have the required minimum historical data, or is the product automatically allocated to MRM 6 in that case?**

   When a product has protection at maturity this prevails over the availability of data. For a PRIIP that has a 100% protection at maturity and insufficient availability of data, the manufacturer may apply the methodology set out in Points 24 and 29 of Annex II, which indicates that the 97.5% VaR at maturity may be assumed to be the redemption amount. This redemption value should then be discounted to the present date using the expected risk-free discount. This does not necessarily mean that the PRIIP will be allocated in MRM 1 as this depends on the discounted value.

   (Published 4 July 2017)

8. **Regarding the correction for risk neutrality in Annex II, 22(c) of the Delegated Regulation - each of the 10,000 simulated returns needs a correction to ensure that the simulated average return is equal**

to an expected risk-neutral return and to avoid that the simulations follow the implicit drift of the historic row. When applying a correction for risk neutrality, the resulting simulations at the end are only usable for final returns (that appear risk-neutral) but not for the intermediate returns, which means that they are not usable for products where the pay-off is a function of the underlying asset even during the holding period.

To determine the performance at intermediate holding periods, the correction has to be performed for each interval of time (e.g. from the start of the investment to the start of the intermediate holding period and then from the start of the intermediate holding period to the end of the recommended holding period). As the correction only depends on the length of each period in time, it can be applied as required.

(Published 20 November 2017)

Methodology for assessing credit risk (Annex II, Part 2) [Last update 18 August 2017

1. **In which situations does the credit risk of the underlyings of a PRIIP need to be assessed? In particular, a) what approach should be taken for stocks and UCITS investing in stocks? And b) If a position is fully collateralized, shall we consider that there is no residual Credit Risk?**

   Stocks are not PRIIPs so they could only be subject to the PRIIPs methodology as underlyings of a PRIIP, such as an investment fund, an SPV, unit-linked insurance product, or structured product.

   For the PRIIPs methodology, stocks – for instance equity holdings in companies – do not carry credit risk (as it has been defined for the SRI purposes) since the return on these instruments does not depend on the creditworthiness of a manufacturer or party bound to make, directly or indirectly, relevant payments to the investor. The credit risk of this type of product would be generally captured by the MRM.

   In certain situations the credit risk of a PRIIP needs to be assessed at the level of the underlyings to determine the CRM. In this case either a look-through or a cascade assessment shall be performed.

   A look-through assessment is to be made when the credit risk is entailed solely at the level of the underlying investments or exposures and not at the level of the PRIIP itself (e.g. securities issued by a special purpose vehicle (see point 34 of Annex II Part 2). Point 40 of Annex II Part 2 shall apply in this case.

   A cascade assessment is to be made when the credit risk is entailed at the level of the PRIIP, as well as at the level of the underlying investments or exposures of the PRIIP (e.g. unit-linked insurance contracts). In this case Point 41 of Annex II Part 2 shall apply.

   It is correct that where a position is fully collateralised it is considered that there is no residual credit risk.

   (Published 4 July 2017)

2. **For a PRIIP with an MRM of 6, the aggregate SRI will always be 6. Therefore, is it still necessary to assess the credit risk for a PRIIP with an MRM of 6?**

   The CRM may only adjust the MRM upwards for the SRI. Therefore, if the MRM is 6, the SRI would be 6 as well since the credit risk scale is 1 to 6. Therefore, where the MRM is 6, the CRM has no impact on the SRI based on the aggregated table. However, in terms of the presentation of the SRI, the manufacturer shall include a brief explanation of the classification of the product in the narrative explanation. That explanation may differ depending on the CRM. Therefore, the CRM still needs to be calculated when the MRM is 6. In addition, whilst a credit risk assessment is not required for a PRIIP with an MRM of 7 (in accordance with Annex II, Part 2, Point 30), for the same reasons, the PRIIP manufacturer should still be aware of the credit risk in this case, and where there is material credit risk it may be a good practice for a credit risk assessment to be performed.

   (Published 4 July 2017)

3. **Where the investor has access to a compensation scheme for the investment amount of the KID, is it correct to assume that credit risk is zero?**

   It is not correct to assume that there is no credit risk. A compensation scheme is not included in the CRM assessment. However, a narrative below the SRI (element J) indicates whether a compensation scheme is applicable and cross-refers to the section "What happens if [the name of the PRIIP manufacturer] is unable to pay out?"

   (Published 4 July 2017)

4. **In case a PRIIP is a fund of funds, where the underlying investment is a fund which is in turn investing in another fund, should we consider the funds in which the PRIIP is investing in directly as the underlying investments, or should look through to the underlying exposures, for the credit risk assessment?**

   In the case of fund of funds it is necessary to look-through the different levels of funds to identify the underlying exposures. This does not mean that a credit risk assessment is necessary for all underlying investments or exposures. Point 34 of Annex II, Part II stipulates that the underlying investments or exposures of a fund shall be assessed “where necessary”. “Where necessary” refers to whether those underlying investments or exposures entail credit risk as described in Points 30-36 of Annex II, Part 2, for example, whether the investment represents more than 10% of the total assets or value of the PRIIP.

   (Published 4 July 2017)

5. **How should derivatives be weighted when applying Point 40 of Annex II?**

   The credit risk of the counterparty to a derivative, if it is not fully and appropriately collateralised, should be weighted in proportion to the assets that it represents compared to the other assets for which a credit risk assessment needs to be undertaken.

   (Published 4 July 2017)

6. **Please clarify the requirement in Point 38 of Annex II, part II: where a credit assessment is not available under both (a) and (b), i.e. there is not both a credit assessment assigned to the PRIIP and a credit assessment assigned to a relevant obligor, but one is available solely under (a) or solely under (b), is it possible to use either of these (depending on which of the two is available)?**

   A default credit assessment as set out in Point 43 of Annex II is to be applied in the absence of a credit assessment assigned to the PRIIP, the relevant obligor, or both. The measures under Points 46 to 49 may also apply. In general, where a credit assessment has been assigned at the level of the PRIIP this should take precedence as to a credit assessment at the level of relevant obligors in relation to the PRIIP. Where there are multiple obligors for which a credit assessment is necessary, and a credit assessment is not available for certain of these, the default credit assessment according to Point 43 shall be applied for each of these obligors for which a credit assessment is not available.

(Published 4 July 2017)

7. **Is it fair to assume that a EU-regulated UCITS fund will always meet the requirements under Annex II Point 46 (a) and (b) and thus the CRM for a UCITS fund will always be equal to 1. If not under what circumstances would a UCITS fund not comply with Point 46?**

A UCITS fund will not always have a CRM equal to 1. As described in Points 33 to 36 of Part 2 of Annex II, in the case of a fund, credit risk may need to be assessed in relation to the underlying investments or exposures, for example in the case of exposures to non-exchange traded derivatives and non-cleared OTC derivatives, and to other efficient portfolio management techniques such as repo or securities financing transactions, where these are not fully and appropriately collateralised and amount to 10% or more of the total assets or value of the PRIIP. This is also the case for a structured fund providing a full capital guarantee to its investors.

(Published 4 July 2017)

8. **Is it possible for an insurance company to satisfy the criteria in Point 47 of Annex II, Part 2?**

The drafting of the credit risk mitigation factor in Point 47 of Annex II, Part 2 is purposefully abstract and general in view of ensuring its broad potential applicability by the full range of PRIIP manufacturers, so as to not include or exclude specific types of PRIIP manufacturers or provide a specific treatment only for certain PRIIP manufacturers, for instance to either exclude insurance undertakings or to result in only insurance undertakings being able to satisfy this provision.

Point 47 (a) relates to the matching of assets and liabilities over time. It ensures that the assets backing the payment obligations of a PRIIP are able to satisfy – that is, are at least equivalent to, the payment obligations of the PRIIP.

Point 47 (b) relates to the specific identification of these assets. It refers to arrangements based on provisions in the Solvency II Directive, but does not exclude that other arrangements, including by PRIIP manufacturers who are not insurance undertakings, can satisfy this provision.

Point 47 (c) relates to the priority of claims of retail investors to these assets over the claims of other creditors.

With respect to insurance undertakings, the Commission Delegated Regulation does not automatically lead to the conclusion that either all or no insurance undertakings would benefit from the application of Point 47. Some insurance undertakings are exempt from Solvency II, and these may not be able to meet the conditions under Point 47. In addition, the application of Point 47 would not be met by all insurance undertakings that are subject to Solvency II. Each insurance undertaking would need to apply the criteria set out in Point 47 to assess whether the mitigation foreseen in Point 47 can be applied.

Having said this, the breadth of the drafting has raised some specific practical challenges for insurance undertakings as to how to assess the criteria, including in particular in regards the application of 47 (a) and 47 (c) to an insurance undertaking subject to Solvency II. It is therefore appropriate to further clarify the application of Point 47 in this case without altering the substance of this provision.

Regarding Point 47(a), since insurance undertakings have future liabilities that relate to non-financial factors, the prudential approach in Solvency II is to ensure that in total the net present value of these liabilities is covered by assets on an ongoing basis. The insurance undertaking should, that is, be always in a position to transfer its different books of business to another insurance undertaking. For this reason, for those insurance undertakings that comply with Solvency II, Point 47 (a) can be met – this is indicated already in the Commission Delegated Regulation in Recital 6. However, it is not the case that all insurance undertakings subject to Solvency II will be capable of meeting this point at a given time.

Regarding Point 47 (c) this relates to the claims of policy holders in the insurance context. In this case, the two arrangements foreseen under Article 275 (1) (a) and (b) of Solvency II are relevant. The arrangement under Article 275 1 (a) entails the priority of the claims of policyholders over other claimants, and therefore should enable Point 47 (c) to be satisfied.

However, under Article 275 (1) (b) it would depend on how Article 278 of Solvency II is applied. Article 278 requires that any claims that are prior to those of policyholders shall be represented by assets. In view of this those insurance undertakings that are subject to Article 275 1 (b) are expected to hold specific assets in respect of any claims that can be made on the insurance undertakings assets that are prior to those of policy holders. An insurance undertaking subject to Article 275 (1) (b) may in some cases be able to meet the condition under Point 47 (c), so long as these specific assets entirely cover the claims that have priority over those of the policy holders, and also so long as the remaining assets match, on their own, the insurance undertaking's liabilities, as is required under Point 47 (a).

It can be noted that the legislative intention of the two alternatives foreseen in Article 275 (1) (a) and (b) respectively was that these should be implemented so as to be equivalent in outcome in view of policy holder protection.

(Published 4 July 2017)

9. Should the 10% threshold for calculating credit risk in Annex II, part 2, Point 35 be applied per instrument or per exposure?

The 10% threshold should be assessed per reference entity. For example, if a PRIIP invests directly in multiple financial instruments issued by the same reference entity which individually represent less than 10% of the total assets or value of the PRIIP, but which when considered together represent 10% or more of the total assets or value of the PRIIP, then for the purposes of Annex II, Part 2, Point 35, these instruments should be assessed as an exposure of more than 10% to be separately assessed.

When a PRIIP ("initial PRIIP") invests in another PRIIP ("underlying PRIIP") that does not entail credit risk itself but makes underlying investments that entail credit risk, a look through analysis is required only if the underlying PRIIP represents an exposure of 10 % or more of the total assets or value of the initial PRIIP.

(Published 18 August 2017)

10. In accordance with Annex II, Part 2, Point 42 the credit quality step shall be adjusted to the maturity or recommended holding period of the PRIIP. Should the maturity to be used for this adjustment be updated over time during lifetime of the product?

Yes, the adjustment should reflect the maturity of the PRIIP at the time that the KID is prepared or reviewed. In this latter case, and for those products with a fixed end date, the remaining time to maturity should therefore be used.

(Published 18 August 2017)

11. **Can a credit assessment assigned to a group be used for the assessment of the credit risk of the relevant obligor?**

A credit assessment can only be used where it relates to the PRIIP or the legal entity that is the relevant obligor or guarantor.

(Published 18 August 2017)

Summary Risk Indicator (SRI) (Annex III) [Last update 18 August 2017]

1. **Clarification is necessary on the specific currency risks which will be covered by Element C of Annex III of the Commission Delegated Regulation. Clarification is necessary for PRIIPs distributed simultaneously in EUR and a non-EUR jurisdiction, as to whether only the currency risk between the product currency and the home currency of the investor is covered.**

   Only the currency risk between the product currency and the currency of the Member State where the product is being marketed is covered. See Article 3(2)(c) of the Commission Delegated Regulation.

   (Published 4 July 2017)

2. **How should the CRM be calculated when the credit risk needs to be assessed only for a part of the assets of the PRIIP? For example if there are both individual investment holdings representing 10% or more of the total value of the PRIIP and individual holding of below 10%; are all individual holdings below 10% given a credit quality step of 0?**

   A proportional approach should be used when calculating the CRM.

   In the case of credit risk assessed on a look-through basis in accordance with Point 40 of Annex II, Part 2 the credit quality step (CQS) shall be weighted in relation to the proportion of total assets that each exposure represents. This can be illustrated with an example:

   Asset A 12% CQS 1

   Asset B 12% CQS 5

   The rest of the assets (i.e. 76%) are not separately assessed and therefore a CQS of 0 should be used.

   This means the weighted average CQS is (12% * 1) + (12% * 5) + (76% *0) = 0.72 (Rounded up to 1)

   (Published 18 August 2017)

3. **What are the implications of Point 53 of Annex II, Part 3 in terms of the monitoring of data? In particular, is it necessary to calculate the MRM on a daily basis?**

   The requirements for the review of the KID are set out in Article 15 of the Delegated Regulation, where it is stated that changes in the summary risk indicator shall be identified without undue delay. The requirement in Annex II, Part 3, Point 53 is for the PRIIP manufacturer to monitor the market data relevant to the calculation of the MRM.

   Where the reference points for the MRM calculation are daily market prices, although a daily recalculation of the MRM would be possible, the exact frequency with which the MRM needs to be calculated is not prescribed.

4. Does “as appropriate” in Point 7 of Annex III mean that the wording of the elements A-J can be amended? Or should the manufacturer remove an entire text element if it is not suitable for a specific PRIIP?

The term "as appropriate" refers to whether or not the issue is relevant to the PRIIP, for example in relation to element D this text is not appropriate where there are no circumstances in which the retail investors will be required to make further payments to pay for losses. Where the retail investor may be required to make further payments to pay for losses the exact wording of the narrative explanations shall be used, unless the template explicitly allows the manufacturer discretion to draft the appropriate text, such as for Element E.

(Published 18 August 2017)

Performance Scenarios (Annex IV) [Last update 20 November 2017]

1. **With reference to Annex IV Points 19-20: could you clarify for which intermediate holding periods should we show performance scenarios during the lifetime of a product? (E.g.: 1.1 years product, with remaining lifetime of 9 months). We believe this should reference the remaining life of the product.**

   For products with a fixed end date, the remaining time to maturity should be used to demonstrate the performance scenarios. Therefore, in this specific example, in accordance with Point 21 of Annex IV no intermediate performance scenario is needed where the time to maturity is less than a year.

   (Published 4 July 2017)

2. **Where do savings plans in funds sit for performance scenarios? Template B of Annex V refers to "regular investments" and includes a line entitled "accumulated investment amount", but can the manager delete the narrative that relates specifically to the insurance element (such as "survival" and "death")?**

   Yes, the terms [Survival] and [Death] are between square brackets to indicate that they can be deleted where they are not applicable.

   (Published 4 July 2017)

3. **How should the number of trading periods to use be calculated (Point 9 of Annex IV)?**

   The Delegated Regulation does not specify a conventional number of trading periods which compose one year. Since conventions can vary between Member States or markets, the number of trading periods to use should be the actual number of prices observed in the prescribed interval.

   (Published 20 November 2017)

4. **How should the term "rolling" in Point 10(c) of Annex IV be applied?**

   Rolling means that the volatility should be measured with the sub-interval – of length w – increasing by one step each time; for example where there are daily prices and a recommended holding period of 1 year (see Point 10(a) of Annex IV of the Delegated Regulation) the sub-interval would start at 1-21 days and roll to 2-22, 3-23 etc.

   (Published 20 November 2017)

Derivatives [Last update 20 November 2017]

1. **Should KIDs for ETDs be produced per individual series or can a KID with a lower level of granularity be provided?**

   In the case of futures, call options or put options traded on a regulated market an appropriate level of granularity could be a grouping according to the type of derivative and underlying (e.g. securities, currencies, interest rates, commodities, indices, etc.), as long as the relevant product characteristics, such as exercise style, that determine the presentation of risks and costs in the KID are the same within that group. This level of granularity could for example result in different KIDs for long call options on shares, short put options on indices or futures long.

   (Published 4 July 2017)

2. **Can non-ETDs use the same treatment as ETDs?**

   Call options, put options or futures traded on certain trading venues, including MTF may have similar features to those traded on a regulated market, such as high levels of standardisation. However, these products may also differ considerably in terms of risk or reward and costs structure as a result of the characteristics of the trading venue. The use of a pay-off structure graph and an equivalent level of granularity to that described in question 1 of this section [Derivatives] should only be possible for call options, put options or futures that have the same characteristics relevant for the KID, for example in terms of risk and reward, as call options, put options or futures traded on a regulated market.

   This condition is not considered to be fulfilled unless at least the following conditions are met:

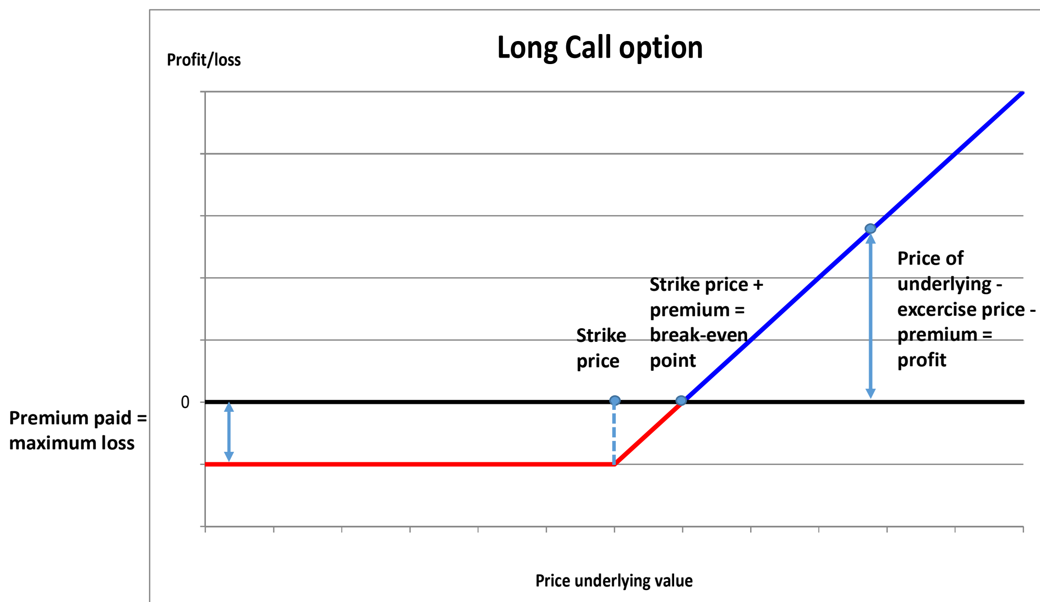
- The trading venue has non-discretionary rules;
- The definition of the contract is fixed by the trading venue;
- The costs of trading are fixed by the trading venue;
- The structure of the trading venue allows for an efficient price formation process: this is considered to be facilitated when at least one market maker is available and the quotation rules are as stringent as those in place on a regulated market in term of bid-ask spread, size and presence;
- The contract is cleared through a CCP;
- The policy the trading venue follows in cases of corporate actions (such as dividend payments, stock splits, etc.) ensures the retail investor will not have a worse outcome as a result of a corporate action than for the same derivative on a regulated market.

(Published 4 July 2017)

3. **Can a PRIIP manufacturer supplement the information described in Annex IV, point 17, of the Commission Delegated Regulation for the pay-off graph to ensure that it is comprehensible and meaningful for retail investors?**

Whilst the information described in Point 17 of Annex IV must be included in the pay-off graph, in order to help a retail investor to understand the product and what it means for his / her return, a good practice would be to provide the retail investor with some additional information in the pay-off graph to help him / her interpret the graph.

An example would be to label some elements of the pay-off graph that show the retail investors how they can calculate their loss or profit at expiration date. A graphical example is provided below:



(Published 4 July 2017)

4. **Can OTC derivatives use the same approach as options and futures traded on an exchange in terms of the level of granularity and the display of risks and performance scenarios?**

It is not possible to use the same approach as for call and put options and futures traded on a regulated market. The KID for an OTC derivative contract should be drawn up indicating the relationship with the underlying asset, the type of underlying asset, the currency of the notional amount, the underlying value of the contract, a representative term, price or interest rate, and any other relevant features such as a strike, barrier or guarantee.

The content of the KID, including the performance scenarios and the cost information, should be based on market data that are representative for the market conditions applicable as long as the OTC derivative contract is made available to retail investors. This means that the KID should not be based on purely hypothetical data nor that it has to contain specific contractual data. In turn, this means that 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, including those outlined in the first paragraph. Equally, a separate KID can be drawn up for each OTC derivative contract reflecting the bespoke offer to the retail investor.

Where the KID does not reflect a bespoke offer, the guiding principle would be that there should be limitations on any differences between the information in the KID and the actual OTC derivative contract purchased such that the requirement for the KID to be accurate, fair, clear and not misleading and consistent with the binding contractual documentation can be satisfied. Regarding the possibility to draw up a KID for an entire class or group of OTC derivatives this would be acceptable only if the data used would be such that the difference between the figures (e.g. on costs) in the KID for the group and the corresponding figures that would have been included in the KIDs of each OTC derivative within that group would be less than the reasonably expected margin of uncertainty on these figures in general.

For example, regarding the representative term, it could be acceptable to draw up KIDs representing different ranges of maturities for a derivative contract (e.g. one KID for the OTC derivative contract with a maturity up to 3 months, one KID for the OTC derivative contract with a maturity from 3 to 6 months, etc.). Regarding the applicable price or interest rate in this case this would need to be accurate within the margin of uncertainty referred to above for all of the OTC derivative contracts within the range of maturities for which the KID is prepared. In order to be fair and not misleading, it may be appropriate to present the information in the KID, such as the performance scenarios and the cost information, reflecting the worst outcome for the investor within the maturity range.

In case of a material change of the market conditions such that the data on which the KID is based are no longer representative for the market conditions, the KID should be reviewed, if that OTC derivative contract is still made available to retail investors. If a KID is drawn up for a bespoke offer, the review requirements do not apply as that PRIIP is by definition no longer available to other retail investors.

(Published 4 July 2017)

4. Is it possible to alter the prescribed wording in the KID template for OTC derivatives?

The prescribed wordings, such as the narrative explanations, are intended to be appropriate for the range of PRIIPs in scope and to facilitate comparison between different products. Therefore, in general, it is not possible to alter the prescribed wording. Nonetheless, in view of the heterogeneity of PRIIP products, cases might occur where the verbatim use of the prescribed wording creates a risk that the retail investor will be misinformed about the characteristics of the product. It is recognised that this is the case for some of the specific prescribed texts when applied to swaps and similar OTC derivative products which do not require initial payments. In this specific case, it is considered appropriate to adjust the text. However, the adjustments should be limited to those set out below, where the following texts are applicable (changes shown in strikethrough and bold).

Presentation of the SRI (Annex III)

1. Text below the presentation of the SRI based on Annex III, point 3(b):
Prescribed language [When considered illiquid]:
You cannot/may not be able to cash in early. You will/may have to pay significant extra costs to cash in early

Specific adjustments:
*You cannot/may not be able to ~~cash in~~ **end your product** early. You will/may have to pay significant extra costs to ~~cash in~~ **end your product** early*

Prescribed language [When considered to have a materially relevant liquidity risk]
"*You may not be able to sell (end) your product easily or you may have to sell (end) at a price that significantly impacts on how much you get back*."

Specific adjustments:
"*You may not be able to ~~sell~~ end your product easily or you may have to ~~sell~~ end your product at a price that significantly impacts on **the performance of your product** ~~on how much you get back~~*."

2. Narrative explanation - Element D
Prescribed language:
"*In some circumstances you may be required to make further payments to pay for losses. (in bold) The total loss you may incur may significantly exceed the amount invested.*"

Specific adjustment:
"*In some circumstances you may be required to make ~~further~~ payments to pay for losses. (in bold) The total loss you may incur may be significant.*

3. Narrative explanation - Element H
Prescribed language:
"*This product does not include any protection from future market performance so you could lose some or all of your investment*."

Specific adjustment:
"*This product does not include any protection from future market performance so you could ~~lose some or all of your investment.~~ **incur significant losses**.*"

4. Narrative explanation – Element I:
Prescribed language:
"If (we) (are) not able to pay you what is owed, you could lose your entire investment"

Specific adjustment:
"If (we) (are) not able to pay you what is owed, you could ~~lose your entire investment~~ ***<u>incur significant losses</u>****"*

Presentation of performance scenarios (Annex V)

<u>1. Templates – Table headings</u>

Prescribed language:
"Investment"

Specific adjustment:
"Nominal amount"

2. Templates – Table rows
Prescribed language:
"What you might get back after costs"
"Average return each year"

Specific adjustment for certain OTC derivatives where the amounts shown will represent the overall value of the product over time, which could result in amounts due to, or owed by, the retail investor:
"*What you might get back* ***<u>or pay</u>*** *after costs*".
*"Average return/****<u>loss over nominal amount</u>*** *each year"*

<u>2. Narratives - Element A</u>
Prescribed language:
"*This [table/graph] shows the money you could get back over the next [recommended holding period] years, under different scenarios, assuming that you invest EUR […] [per year]."*

Specific adjustment:
"*This table shows the money you could get back* ***or pay*** *over the next [recommended holding period] years, under different scenarios, assuming ~~that you invest~~* ***<u>a nominal value of</u>*** *EUR […] ~~[per year]~~"*

<u>3. Narratives - Element E</u>
Prescribed language:
"*This product cannot be [easily] cashed in. This means it is difficult to estimate how much you would get back if you cash in before [the end of the recommended holding period/maturity]. You will either be unable to cash in early or you will have to pay high costs or make a large loss if you do so.*"

Specific adjustment:
"*This product cannot be [easily] ~~cashed in~~* ***<u>ended</u>****. This means it is difficult to estimate how much you would get ~~back~~ if you ~~cash in~~* ***<u>end</u>*** *before [the end of the recommended holding period/maturity]. You will either be unable to ~~cash in~~* ***<u>end</u>*** *early or you will have to pay high costs or make a large loss if you do so.*"

Presentation of costs (Annex VII)

<u>1. Description of Reduction in Yield in the section "What are the costs?"</u>
Prescribed language:
"*The Reduction in Yield (RIY) shows what impact the total costs you pay will have on the investment return you might get. The total costs take into account one-off, ongoing and incidental costs.*

The amounts shown here are the cumulative costs of the product itself, for three different holding periods. They include potential early exit penalties. The figures assume you invest [EUR 10 000 (OR EUR 1 000 each year for regular premium PRIIPs)]. The figures are estimates and may change in the future."

Specific adjustment:
"*The Reduction in Yield (RIY) shows what impact the total costs you pay will have on the ~~investment return you might get~~* ***performance of the product****. The total costs take into account one-off, ongoing and incidental costs.*

The amounts shown here are the cumulative costs of the product itself, for three different holding periods. They include potential early exit penalties. The figures assume ~~you invest~~ ***a nominal value of*** *[EUR 10 000 (OR EUR 1 000 each year for regular premium PRIIPs)]. The figures are estimates and may change in the future".*

2. Table 1 "Costs over time"
The text "investments" should be replaced with "notional amount"

The text "if you cash in" should be replaced with "if you end"

3. Table 2 "Composition of costs"

Prescribed language:
"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"

Specific adjustment:
"the impact each year of the different types of costs on the ~~investment return you might get~~ ***performance of the product*** *at the end of the recommended holding period"*

(Published 20 November 2017)

Multi-option products (MOPs) [Last update 20 November 2017]

1. How does the information on the underlying options of a MOP need to be provided?

The rules for the provision of the KID are set out in Articles 13 and 14 of the Regulation. For MOPs, in accordance with Article 10 of the Delegated Regulation, information can be provided in two different ways.

The provision of the KID – in a face to face distribution - is on paper unless the investor requests the KID through a durable medium other than paper or by means of a website. In the latter cases, the person advising on, or selling, the PRIIP would need to evidence that the conditions in paragraph 4 or 5 of Article 14 of the Regulation were met. This also applies in the case of an “open architecture” product design, i.e. where a contract allows for retail investors to invest in a wide range of investment options.

The person selling the PRIIP is not precluded from providing information to the retail investor in addition to the provision of information necessary for the satisfaction of the requirements in Article 14 of the Regulation, for instance if the retail investor requests certain documents on paper in addition to those provided through a durable medium other than paper or by means of a website, (such as the generic KID or specific information on certain underlying investment options where the approach in Article 10(b) of the Delegated Regulation is used).

Furthermore, taking into account the sales process followed, for example if advice is given, it is not necessary to provide the retail investor with information on every possible underlying investment option available, but only those options that the retail investor is considering. In this case, the person advising on, or selling, the PRIIP would need to be able to evidence that the retail investor is considering a limited number of the underlying investment options and agrees to be provided with information on those options only.

In all cases, the person advising on, or selling, the PRIIP would need to evidence how it was determined that the conditions for the provision of the KID in good time were met, or alternatively that the conditions in Article 13(3) of the Regulation were satisfied.

(Published 20 November 2017)

2. In the case of Article 10(b) of the Delegated Regulation how should information on costs be reflected in the generic KID?

The generic KID should present a range of costs by showing figures for the highest and lowest costs of the product depending on which underlying investment option is selected and state that the costs to the retail investor vary on the basis of the selection.

It is expected that this statement would include some explanation of how the costs can vary, for example which parts of the costs are fixed and variable.

The default approach is that the figures used to determine this range of costs should include all product costs and therefore combine the costs specific to each underlying investment option (e.g. transaction costs) with the other costs of the product, such as the costs of the insurance cover. This is the case where the specific information on each underlying option is prepared in accordance with Article 14(1) of the Delegated Regulation and accordingly Article 13(1) of the Delegated Regulation applies.

Where some or all of the underlying investment options are UCITS or non-UCITS fund referred to in Article 32 of Regulation (EU) No 1286/2014, the Delegated Regulation allows for a number of different approaches, depending on whether the MOP manufacturer decides to provide information on underlying investment options in accordance with Article 14(1) or Article 14(2) of the Delegated Regulation:

- To start with, the MOP manufacturer may still decide to present the range of costs in accordance with Article 13(1)(a) of the Delegated Regulation.

- Alternatively, in accordance with Article 13(2) of the Delegated Regulation, for investment options that are UCITS and non-UCITS funds referred to in Article 32 of Regulation (EU) No 1286/2014 the MOP manufacturer can decide to calculate the transaction costs using the methodology for new PRIIPs in point 21 of Annex VI of the Delegated Regulation (even though the fund may have been operating for more than 3 years). In all other respects and for all other underlying investment options the calculation of the cost figures follows the requirements in Annex VI of the Delegated Regulation.

- Finally, in accordance with Article 13(3) of the Delegated Regulation, where the MOP only offers UCITS or non-UCITS funds referred to in Article 32 of Regulation (EU) No 1286/2014 as underlying investment options, the MOP manufacturer can present the range of costs for the investment options in the generic KID based only on the costs specified in each of the key investor information documents. Information on costs related to insurance (and insurance benefits) would be included in the 'What is this product?' section of the generic KID.

(Published 20 November 2017)

Methodology for the calculation of costs

I. List of costs of investment funds (except transaction cost related questions) (Annex VI, Part 1) [Last update 4 July 2017]

1. **Point 3 (d) of Annex VI indicates that subscription fee includes taxes. Would this include the following types of taxes: VATs, FTTs, stamp duties?**

   Yes, these are notably the types of taxes that are referred to in this point.

   (Published 4 July 2017)

2. **How would the benefits from securities lending (compared to the costs as mentioned in Point 5 (b) (v) of Annex VI) be presented in the KID?**

   The benefits from securities lending would be taken into account in the performance scenarios section of the KID if these are passed to the investor. If these benefits are not passed to the investor, they should be accounted for as costs, according to Point 5(p) of Annex VI.

   (Published 4 July 2017)

3. **Is a look-through only required for underlying investments above a certain threshold within the portfolio of the fund of fund? When dealing with fund of fund or other multi-layer instruments, does the cost look-through need to be done through all layers or only through the first layer of underlying? Private equity feeder funds invested in a master fund: do we have to apply a look through basis?**

   The calculation should take into account the costs incurred in the underlying funds or other underlying PRIIPs. Where the underlying investments are PRIIPs producing KIDs, it will only be necessary to obtain cost information from the KIDs. Where the underlying investments do not have KIDs, it will be necessary to obtain KID equivalent information for the direct underlyings. This is because this information includes costs incurred in any further layer of the underlying. This calculation applies to private equity feeder funds as well.

   (Published 4 July 2017)

4. **Some fees are paid from the fund/investors to the manager based on the narrowing of the share price to NAV discount on a closed-ended listed fund. Should this type of fee be classed as a performance fee?**

   The methodology specified in Point 24 of Annex VI applies to all performance related fees defined in Point 6 as "performance–related fee payable to the management company or any investment adviser".

   (Published 4 July 2017)

5. **In the case of private Equity, infrastructure and other similar funds where the investments to be made by those funds are unknown at the date of creation/investment in the fund, how to anticipate costs that should be calculated for the purpose of the cost section of the KID?**

   In this case, the section "Calculation methodology for new PRIIPs" of the annex VI shall apply (Points 85 and followings) that includes in particular the use of best estimates adopting as proxies either a comparable PRIIP or a peer group. With respect to performance fees and carried interest, there are specific requirements for new PRIIPs, included in Point 24 (b) and 25 (b) of Annex VI.

   (Published 4 July 2017)

6. **Could you provide an example of the provisioned fees for specific treatment of gain and losses, which are referred to in Point 5 (d) of Annex VI?**

   For example, such fees are related to the treatment of gains and losses (withholding tax) in some non-EU countries, and the corresponding potential fees taken by asset managers on an ex-ante basis.

   (Published 4 July 2017)

7. **While financing costs related to borrowing (provided by related parties)" are recognised as a recurring cost in Point 5(h) of Annex VI, could you confirm that overdraft charges on a bank account operated by an external custodian are in the scope of such cost calculation and disclosure?**

   Yes, overdraft charges on a bank account operated by an external custodian are in the scope of such cost calculation.

8. **Could you specify which types of costs of capital guarantee provided by a third party guarantor are those mentioned in Point 5 (i) of Annex VI?**

   Costs of capital guarantee are in particular related to the instruments (and associated costs) aimed to provide for the capital guarantee.

   (Published 4 July 2017)

9. **Could you provide an example of the 'dividends served by the shares held in the portfolio of the funds, shall the dividends not accrue to the fund' mentioned in Point 5 (r) of Annex VI?**

   An example would be the following unit link contract. The unit link is based on the performance of a single stock. The insurer owns the stock and is receiving the dividends. The client has initially purchased the unit link at the market value of the stock. The claim of the client is subsequently valued as the current value of the stock (without reinvestment of the dividends).

(Published 4 July 2017)

10. For new funds with performance fees, is it possible to refer to an appropriate benchmark for estimating the relevant returns of a peer group as foreseen in Point 24(b)(ii) second subparagraph of Annex VI?

When computing performance fees for new funds, the relevant fund return shall be estimated using the return of a" comparable fund or a peer group". The "appropriate benchmark" as referred to in Point 5 of Annex II used for the purpose of the calculation referred to in Point 4 of Annex IV could indeed be considered as a "peer group" under the requirements of Point 24(b)(ii) of Annex VI. If this “appropriate benchmark” is composed of other investment funds the respective returns of which are calculated on the basis of net fund performance, the adjustment of returns in terms of costs referred to in Point 24(b)(ii) second subparagraph of Annex VI is not needed.

(Published 4 July 2017)

11. According to Point 5 (l) (i) the most recently available summary cost indicator shall be used. What is meant by most recently available summary cost indicator?

The most recently available summary cost indicator is the one that has been calculated according to Points 61 to 89 of the same Commission Delegated Regulation. Point 79 indicates that the summary cost indicator shall be calculated at least once a year.

(Published 4 July 2017)

II. Transaction costs (Points 7-23 of Annex VI, Part 1)

Methodology set out in Point 21 of the Annex VI of the Commission Delegated Regulation (standardized costs) [Last update 4 July 2017]

- *Guidance on the methodology described in point 21 (c) (i) to estimate transaction costs:*

1. **What could be the 'reference indexes' mentioned in Point 21 (c) (i) of the Annex VI of the Commission Delegated Regulation?**

The 'reference indexes' mentioned in Point 21 (c) (i) could be the following:

Asset Classes	**Sub Asset Classes**	**Indice**
Government bonds	Government bonds and similar instruments developed market rating AAA-A	*JPMorgan EMU AAA-A + JPMorgan US* *Barclays Euro Sovereign High Quality Index*
	Government bonds and similar instruments developed market different rating below A	*filtering on JPMEMU or iBoxx € Overall*
Government bonds emerging markets (hard and soft currency)	Government bonds emerging markets (hard and soft currency)	*JPMorgan EMBIG Diversified* *Barclays EM Local Currency Liquid Government Index*
Investment grade corporate bonds	Investment grade corporate bonds	*Barclays Euro Corporate IG + Barclays US Corporate IG* *EURO STOXX 50® Corporate Bond*
Other corporate bonds	High yield corporate bonds	*Markit iBoxx EUR High Yield Liquid + Markit iBoxx USD High Yield Liquid*
Liquidity	Money market instruments (for the sake of clarity, money markets funds not included)	*Barclays Euro Treasury Bill*
Shares developed markets	Large-cap shares (developed markets)	*MSCI World Large Cap* *STOXX® Europe 50* *STOXX® Developed Markets 150*
	Mid-cap shares (developed markets)	*MSCI World Mid Cap* *EURO STOXX® Mid*
	Small-cap shares (developed markets)	*MSCI World Small Cap* *EURO STOXX® Small*
Shares emerging markets	Large-cap shares (emerging markets)	*MSCI Emerging Markets Large Cap* *STOXX® Emerging Markets 50*
	Mid-cap shares (emerging markets)	*MSCI Emerging Markets Mid Cap* *STOXX® Emerging Markets 500 Mid*
	Small-cap shares (emerging markets)	*MSCI Emerging Markets Small Cap* *STOXX® Emerging Markets 500 Small*

(Published 4 July 2017)

2. **Using the 'reference indexes' mentioned in the question above, how should the 'average bid-ask spreads' mentioned in Point 21 (c) (i) of the Annex VI of the Commission Delegated Regulation be estimated?**

   Please refer to the Appendix I to this Q&A

   (Published 4 July 2017)

- *Guidance on the methodology described in Point 21 (c) (ii) to estimate transaction costs:*

3. **What could be the 'explicit costs' and 'comparable information' mentioned in Point 21 (c) (ii) of the Annex VI of the Commission Delegated Regulation?**

   The explicit costs' mentioned in Point 21 (c) (ii) of the Annex VI of the Commission Delegated Regulation could be, for example, transaction taxes and commission payments.

   The "comparable information' could be for example i) the transaction costs of a comparable fund or peer group (as an example of source: fund annual reporting); ii) information about transaction costs used to calculate the bid and ask prices of the fund

   (Published 4 July 2017)

Other Q&A on transaction cost related issues [Last update 4 July 2017]

1. **According to Point 8 of the Annex VI of the Commission Delegated Regulation aggregate transactions shall be calculated as the sum of all transaction costs for all individual transactions undertaken by the PRIIP in the specified period. What is meant by specified period?**

   The term specified period refers to the period of three years, as outlined in Point 7.

   (Published 4 July 2017)

2. **According to Point 21 of the Annex VI of the Commission Delegated Regulation for PRIIPS that have been operating less than 3 years transaction costs may be calculated as an average of the actual transaction costs incurred during the period of operation and a standardized estimate. When and how should the costs be calculated?**

   At the occasion of the first annual review the product manufacturer can use data about the actual transaction costs for the first six months of the PRIIPs existence and for the remaining 30 months (to give an average over 3 years) the estimate of portfolio turnover in each asset class according to the methodology referred to in Point 21 c). Accordingly, at the second annual review the product

manufacturer may use 18 months of actual data and for the remaining 18 months the standardized estimate.

(Published 4 July 2017)

3. **Transaction costs are based on the average of the previous three years, but some managers have not been collecting these in the detail required (with the "arrival price") by Annex VI. How to calculate transaction costs in this case?**

In this case, Point 15 of Annex VI may apply: "When calculating transaction costs using data prior to 31 December 2017, intra-day prices may be considered as not available" (therefore 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").

Notwithstanding this, firms should consider whether using opening prices or previous closing prices will lead to a result that is contrary to the overall requirement to be accurate, fair, clear and not misleading. For example, where a PRIIP frequently buys and sells the same instrument on an intra-day basis, using the opening or previous closing price will not be accurate, since this would be the same for both the purchase and sale. In this instance, the firm should seek accurate intra-day arrival prices.

(Published 4 July 2017)

4. **Should transaction costs be calculated the same way in the 'Composition of costs' and the 'Cost over time' table?**

Yes, in both cases, transaction costs should be calculated according to Point 65 and followings of Annex VI.

(Published 4 July 2017)

5. **When comparing the arrival price and execution price of an instrument denominated in a foreign currency, should the manager apply the same FX conversion rate to base currency to both the arrival price and the execution price?**

In this case, transaction costs should be calculated in foreign currency and then converted to base currency using the FX rate on the day of the transaction.

(Published 4 July 2017)

6. **Could the 'reasonable estimate of the consolidated price' referred to in Point 17 of Annex VI be an average of observable quotes within a certain time frame?**

Yes, an average of observable quotes could be a reasonable estimate of the consolidated price, provided that they are not all quotes from a 'single counterparty or foreign exchange platform'.

(Published 4 July 2017)

7. **If the order is a limit order, should the arrival price be the limit order?**

   No, Points 15 and followings of Annex VI do not specify that limit orders should be treated differently to other orders.

   (Published 4 July 2017)

8. **If the prescribed methodology for transaction costs results in obtaining negative costs, should the transactions costs be reflected as negatives, or should the implicit costs portion be shown as 0 instead?**

   The result of the estimate from the methodology specified in the Commission Delegated Regulation should be included (i.e. it should not be 0, if negative).

   (Published 4 July 2017)

9. **When should I use opening prices rather than closing prices to calculate the transaction costs for periods prior to 31 December 2017?**

   Opening prices should be used when they are available. Opening prices will normally be available for equities. Available means they are generally available via market data sources [such as Thomson Reuters / Bloomberg], not simply that they are available as data currently stored within the firm's own systems.

   (Published 4 July 2017)

10. **How should I calculate the transaction costs associated with an IPO or other offering of primary securities?**

    The transaction costs of IPOs and other offerings of primary securities should use the offer price as the arrival price.

    (Published 4 July 2017)

III. List of costs of PRIPs other than investment funds (Annex VI, Part 1) [Last update 4 July 2017]

1. **According to Point 33 (b) of Annex VI, the costs of the underlying shall be taken into account in the list of costs of PRIPs other than investment funds. How should this requirement be understood in the case of a structured product or derivative linked to the performance of a fund?**

   First, it should be noted that if these costs are already taken into account (e.g. through the estimate of costs embedded in the price), these costs should not be accounted twice in the summary cost indicators, according to Point 77 of Annex VI. In addition, the methodology set out in the case of investment funds in the Points 5 (l), 5 (m) and 5 (n) should equally apply in the case of PRIPs other than investment funds (as well as in the case of insurance-based investment products which invest in funds).

   (Published 4 July 2017)

2. **Is it correct to say that for the purpose of the Points 36 and followings, while the fair value of the product needs to be in line with accounting standards, it does not have to be necessarily equal to any accounting fair value (as accounting standards generally allow for provisions and adjustments to the fair value which are at book or portfolio level, rather at transaction level)?**

   Yes, as mentioned in Point 40 of Annex VI, the rules referred to in Point 39 of this Annex VI on fair value shall aim at outlining a valuation process that complies with the applicable accounting standards in relation to fair value and the principles outlined in Points 40 - 46 of the same Annex. This does not mean that the value should be necessarily equal to the accounting fair value.

   (Published 4 July 2017)

3. **What value should be input into portfolio transaction costs of PRIPs other than investment funds?**

   This will depend on the situation of each PRIP. All costs must be included but only once. When transaction costs are, for example, included in hedging costs, there should not be any double counting of such costs, as specified in Point 77 of Annex VI.

   (Published 4 July 2017)

4. **According to the Point 37 of Annex VI 'If the PRIIP manufacturer is unable to distinguish the relevant implicit costs to be disclosed as referred to in Point 29 of this Annex using the difference between the price and the fair value, it shall liaise with the issuer of the different components of the product, or the relevant body, in order to gather the relevant information on those costs'. Could you provide with an example of such a situation?**

   This situation in particular occurs when a contractual arrangement between two entities (e.g. one being the PRIIP manufacturer and the other the issuer of one or more derivative components used by the PRIIP manufacturer to structure its PRIIP) is such that the PRIIP manufacturer is not aware of the amount of hedging cost of a specific PRIIP.

(Published 4 July 2017)

5. **The exchange as manufacturer may not know all the costs, since some costs are added by the broker. In this situation is it acceptable for the exchange only to report the costs which relate to the product as they create it?**

The manufacturer should only need to include distribution costs to the extent that the costs are fixed (e.g. certain) and the manufacturer is aware of them. Therefore an exchange does not need to include costs that are added by the broker, where these are different between different brokers. With respect to extra costs, Annex VII (table 1) of the Commission Delegated Regulation specify that the following explanatory text should be included in the KID: "*The person selling you or advising you about this product may charge you other costs. If so, this person will provide you with information about these costs, and show you the impact that all costs will have on your investment over time*".

(Published 4 July 2017)

IV. List of costs of insurance-based investment products (Annex VI, Part 1) [Last update 4 July 2017]

1. **Are portfolio costs for traditional endowment insurances to be taken into account in the summary cost indicator of the KID?**

   Yes, Point 52 (g) of Annex VI indicates that "Any amount implicitly charged on the amount invested such as the costs incurred for the management of the investments of the insurance company (deposit fees, costs for new investments, etc.)" shall be taken into account in the summary cost indicator. And Point 52 (h) of Annex VI specifies that "payments to third parties to meet costs necessarily incurred in connection with the acquisition or disposal of any asset owned by the insurance-based investment product (including transaction costs as referred to in Points 7 to 23 of this Annex" shall also be taken into account in the summary cost indicators.

   (Published 4 July 2017)

2. **Does Point 53 of Annex VI apply inter alia to insurance-based investment products (unit-linked products as well as non-unit-linked products) in which the capital provided by investors is invested in UCITS, AIFs or other PRIIPs?**

   Yes, this Point applies to insurance-based investment products that invest a part of their assets in UCITS or AIFs in a PRIIP other than UCITS or AIFs or in an investment product other than a PRIIP. Points 5 (l), 5 (m) and 5 (n) of Annex VI shall then apply respectively.

   (Published 4 July 2017)

3. **Point 52(h) of Annex VI indicates that transaction costs are included in the 'other ongoing costs'. Does that mean that in the table 2 'Composition of costs" of the Annex VII, transaction costs should be included in the costs of the line 'other ongoing costs' and not shown separately in the section 'ongoing costs' of that table?**

   No, as indicated in Point 66 of the Annex VI and in the table 2 of the Annex VII itself, transaction costs should be shown separately in the section "ongoing costs" of the table 2 of the Annex VII.

   (Published 4 July 2017)

V. Calculation of the summary cost indicators (Annex VI, Part 2) [Last update 4 July 2017]

1. **The Reduction in Yield (RIY) summary cost indicator is based on the moderate scenario of the performance scenario section of the KID (according to Point 71 (a) of Annex VI), which is based on prices which are already net of charges. Is it therefore necessary to add the charges back into the returns and then deducting all costs to arrive at a net return when calculating the RIY indicator?**

   No, the estimation of the future benefits for the purpose of the calculation of the RIY indicator shall be calculated according to the methodology and hypothesis used for the calculation of the moderate scenario of the performance scenario section of the KID (except for PRIIPs as referred to in Point 17 of Annex IV, according to Point 71 (c)), without further deductions or calculations.

   (Published 4 July 2017)

2. **For a product with tiered charging, is it possible to make an assumption on investment growth to reflect in the cost over time section given it is difficult to determine what the underlying assets are?**

   In this case as well, according to Point 71 (a) of Annex VI, the estimation of the future benefits for the purpose of the calculation of the RIY indicator shall be calculated according to the methodology and hypothesis used for the estimation of the moderate scenario of the performance scenario section of the KID.

   (Published 4 July 2017)

3. **In the case of unit-linked products the underlying of which are UCITS, is it possible to use a predetermined yield for the purpose of the estimation of the benefits to be used in the calculation of the RIY indicator?**

   In this case as well, according to Point 71 (a) of Annex VI, the estimation of the future benefits for the purpose of the calculation of the RIY indicator shall be calculated according to the methodology and hypothesis used for the estimation of the moderate scenario of the performance scenario section of the KID. Please also refer to Points 74 to 76 of Annex VI which are specific to insurance-based investment products.

   (Published 4 July 2017)

VI. Presentation of costs (Annex VII) [Last update 18 August 2017]

1. **Should entry and exit fee ratios under the table 'Composition of costs' of Annex VII be recalculated as an impact per year based on the recommended holding period instead of a RIY figure?**

   No, the calculation of all costs in the second table 'Composition of costs' are specified in Points 61 and followings of Annex VI. These are RIY indicators calculated at the recommended holding period, allowing these figures to be consistent with the RIY at the recommended holding period included in the second line 'Impact on return (RIY) per year' of the first table 'Cost over time', as specified in Annex VII.

   (Published 4 July 2017)

2. **Should the line 'Incidental costs' (performance fees and carried interests) included in the table 'Composition of costs' of Annex VII be included in the case of insurance-based investment products and PRIPs other than investment funds?**

   No, according to Points 6 and 68 of Annex VI, incidental costs and incidental costs ratios apply to investment funds, not to the other types of PRIIPs.

   (Published 4 July 2017)

3. **Which impact of costs on the investment return is shown in table 2 (composition of costs)?**

   The table shows the impact of the different types of costs on the investment return the investor might get at the end of the recommended holding period. The values indicated are the annualized impact on return per year, and more precisely the RIY at the recommended holding period.

   (Published 4 July 2017)

4. **How should the information on costs mentioned in Article 2(4) of the delegated Regulation 2017/653 be presented?**

   Article 2(4) of the Delegated Regulation indicates that "*The details of insurance benefits in the section entitled 'What is this product?' of the key information document shall include (…) or the <u>impact of the cost part of the biometric risk premium taken into account in the recurring costs of the 'Costs over the time table' calculated in accordance with Annex VII</u>*".

   So that this information on the cost part of the biometric risk premium is shown to retail investors in a comparable and consistent way, the cost part of the biometric risk premium could be presented using a cost ratio, as for the other types of costs presented in the KID. For the purpose of this question and answer, this ratio is called in the following parts of this answer the "insurance costs ratio".

   For the calculation of this insurance costs ratio, the costs to be disclosed should be the insurance costs according to Points 59 and 60 of Annex VI for insurance based investment products and the

methodology to be used for the calculation of the ratio should be the methodology described in Points 70 to 76 of Annex VI.

This information on this cost part of the biometric risk premium could be accompanied with the following narratives:

"This is the impact of insurance costs.

[Where full biometric risk premium presented]. This is the impact of the amount you are paying to buy insurance protection.

[Where cost part of the biometric risk premium presented] This is the impact of the amount you are paying for insurance cover which exceeds the estimated value of insurance benefits

Insurance costs are included in the "total costs" and "other ongoing costs" presented in the cost section.

(Published 18 August 2017)

5. **Is the biometric risk premium part of the investment of insurance-based investment products?**

   In order to be consistent with table 1 in Annex VII (Cost over time), where investment is 10000 EUR (or 1000 EUR regular premium), investment should be the total payment made by the retail investor and insurance premium should be part of it. Furthermore, since insurance costs are part of the total costs, the biometric risk premium is a part of the total investment.

   (Published 18 August 2017)

6. **When performance fees or exit costs are not applicable for a product - does the format of Table 2 Composition of costs allow that the manufacturer to mention 'n.a.' instead of '0%' in the table?**

   Yes, in that specific case, the table 2 Composition of costs allows the manufacturer to mention 'n.a.' instead of '0%' in the table."

   (Published 18 August 2017)

7. **For derivatives that do not require an investment, does the format of Table 2 Composition of costs allow to use the word 'Notional amount' instead of 'Investment'?**

   Yes, the words 'Notional amount' could be used in that case.

   (Published 18 August 2017)

8. **The paragraph which comes directly after the heading "Table 1" ("The person selling you or advising you about this product …") is duplicate in view to Element K of Annex V and does not apply to all PRIIPs. Is this compulsory?**

Yes, because these statements apply to two different sections of the KIDs (costs and performance scenarios) in which this information is equally relevant.

(Published 18 August 2017)

VII. Other topics on costs [Last update 4 July 2017]

1. **At what frequency must the Recurring costs and Incidental costs be calculated?**

   According to Point 79 of Annex VI all cost ratios shall be calculated at least once a year.

   (Published 4 July 2017)

2. **Point 80 of Annex VI specifies that "the costs are assessed on an 'all taxes included' basis. Which types of taxes are referred to in this point?**

   These taxes are not the taxes directly paid by the investor, but the taxes that are included in the product (such as transaction tax - duty stamp, financial transaction tax, etc.)

   (Published 4 July 2017)

Appendix I

Standardised transaction costs: examples of calculation [Last update 4 July 2017]

The procedure explained in Point (c) of Point 21 of Annex VI, Part I can be broken down as follows:

EXAMPLES OF CALCULATION

Step 1: Index selection

Identify the relevant index on the basis of table below.

Asset Classes	Sub Asset Classes	Indice
Government bonds	Government bonds and similar instruments developed market rating AAA-A	*JPMorgan EMU AAA-A +* *JPMorgan US* *Barclays Euro Sovereign High Quality Index*
	Government bonds and similar instruments developed market different rating below A	*filtering on JPMEMU or iBoxx € Overall*
Government bonds emerging markets (hard and soft currency)	Government bonds emerging markets (hard and soft currency)	*JPMorgan EMBIG Diversified* *Barclays EM Local Currency* *Liquid Government Index*
Investment grade corporate bonds	Investment grade corporate bonds	*Barclays Euro Corporate IG +* *Barclays US Corporate IG* *EURO STOXX 50® Corporate Bond*
Other corporate bonds	High yield corporate bonds	*Markit iBoxx EUR High Yield Liquid + Markit iBoxx USD High Yield Liquid*
Liquidity	Money market instruments (for the sake of clarity, money markets funds not included)	*Barclays Euro Treasury Bill*
Shares developed markets	Large-cap shares (developed markets)	*MSCI World Large Cap* *STOXX® Europe 50* *STOXX® Developed Markets 150*
	Mid-cap shares (developed markets)	*MSCI World Mid Cap*

		EURO STOXX® Mid
	Small-cap shares (developed markets)	*MSCI World Small Cap* *EURO STOXX® Cap*
Shares emerging markets	Large-cap shares (emerging markets)	*MSCI Emerging Markets Large Cap* *STOXX® Emerging Markets 50*
	Mid-cap shares (emerging markets)	*MSCI Emerging Markets Mid Cap* *STOXX® Emerging Markets 500 Mid*
	Small-cap shares (emerging markets)	*MSCI Emerging Markets Small Cap* *STOXX® Emerging Markets 500 Small*

Step 2: Time period

Identify the valuation day (the tenth business day of the month) and the time period (the 12 months before YYYY/MM).

Step 3: Collect the index/indexes constituents

Collect the index/indexes (Step 1) constituents and their weights for each day of valuation of each month during the time period (as defined in Step 2). (Following an example related to the government bond index).

Date	ISIN	Rating	Index Weight (%)
20160331	ISIN1	AA+	0,00269808
20160331	ISIN2	BB	0,00290327
20160331	ISIN3	AAA	0,00329052
20160331	ISIN4	AA-	0,00155998
20160331	ISIN5	BBB	0,00133706
…	…	…	…
TOTAL			100%

Step 4: Select the source of the closing bid-ask spread

Collect the closing bid-ask spread of the constituents identified in Step 4 for each day of valuation from the source of information identified.

There could be different sources of information for the closing bid-ask spreads of the underlying indexes, since this information may be not available from the index provider [and/or it could be costly]. The selection of the source should be based on reasonable grounds and resulting from an internal procedure. As an example, the potential data source for closing bid-ask spreads of the underlying indexes may be:

- the index provider;
- Multilateral Trading Facilities [as an example MarketAxess];
- Alternative trading system
- Data providers [as an example Bloomberg BVAL, Bloomberg BondTrade Composite (CBBT/BBT), Bloomberg Generic Number (BGN)].

To estimate the transaction cost twelve monthly observation should be taken.

Date	ISIN	Rating	Index/composite Weights (in %)	PX-BID	PX-ASK
20160331	ISIN1	AA+	0,303341	105,3984375	105,484375
20160331	ISIN3	AAA	0,326410	106,9296875	107
20160331	ISIN4	AA-	0,369948	108,46875	108,53125
…	…	…			
			100,00		

Step 5: Calculate the estimate cost of transaction of each point in time

For each day of valuation, the bid-ask spread collected for each constituent (step 5) is divided by two applying the following formula (please see column D in the next table)

$$\frac{P_{ask} - P_{bid}}{2 * P_{mid}}$$

(Remark: in the denominator the multiplication *Pmid is intended to obtain a standardised data).

Then, calculate the estimated cost of transaction at each point in time (E) by multiplying (A) and (D) and adding the results.

Date	ISIN	Rating	Index/composite Weights (A)	PX-BID (B)	PX-ASK (C)	D = (C–B) / 2 x ((C+B)/2))	Estimate cost of transaction of each point in time (E): (A) X (D)
20160331	ISIN1	AA+	0,303341	105,3984375	105,484375	0,040750	0,00012362%
20160331	ISIN3	AAA	0,326410	106,9296875	107	0,032870	0,00010728%
20160331	ISIN4	AA-	0,369948	108,46875	108,53125	0,0288000	0,00010655%
…	…	…					…
TOTAL			100,00				**0,03149%**

Step 6: Calculate the estimate cost of transaction under normal market conditions

Calculate the average of the estimated cost of transaction of each point in time identified (E) in Step 6 for the last twelve months.

Time period	Estimate cost of transaction of each point in time (E)
January	**0,03149%**
February	0,03256%
March	0,03158%
…	
Estimated cost of transaction in normal market condition (Average)	0,031742%

(Published 4 July 2017)