



Commission de Surveillance  
du Secteur Financier

## Circular CSSF 24/857

ESMA Guidelines on stress test scenarios under Article 28 of the Money Market Fund Regulation – update 2023 (ESMA50-43599798-9011)

## **Circular CSSF 24/857**

### **ESMA Guidelines on stress test scenarios under Article 28 of the Money Market Fund Regulation – update 2023 (ESMA50-43599798-9011)**

To all money market funds under the supervision of the CSSF and Luxembourg managers of money market funds as well as to those that take part in the functioning and control of these undertakings.

Luxembourg, 23 April 2024

Ladies and Gentlemen,

We refer to Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds (“MMF Regulation”) as well as the 2018 version of the ESMA Guidelines on stress test scenarios under Article 28 of the Money Market Fund Regulation (Ref. ESMA34-49-115) as integrated by the CSSF in its administrative practices and introduced by means of Circular CSSF 18/696 with a view to promoting supervisory convergence at a European level, thereby becoming applicable in the context of the Luxembourg legal and regulatory framework.

Further, we refer to the 2022 version of the Guidelines (Ref. ESMA/34-49-495), introduced by means of Circular CSSF 23/831, which included common reference stress test scenarios as well as common reference parameters for those scenarios. On that basis, MMFs and their managers were provided with the necessary information to calculate and fill in the corresponding fields on the results of the stress tests of the MMF in the reporting template as set out in the Annex of Commission Implementing Regulation (EU) 2018/708 of 17 April 2018 laying down implementing technical standards with regard to the template to be used by managers of money market funds when reporting to competent authorities as stipulated by Article 37 of the MMF Regulation (“Commission Implementing Regulation”).

The ESMA Guidelines on the reporting to competent authorities under Article 37 of the MMF Regulation (Ref. ESMA34-49-168), published on 19 July 2019 by ESMA, as introduced by means of Circular CSSF 20/736, provide guidance on the contents of the fields of the reporting template laid down in the Annex of the Commission Implementing Regulation, including for the fields on the stress tests.

The purpose of this Circular is to inform you that the CSSF, as competent authority, integrates the latest version of the ESMA Guidelines on stress test scenarios under the MMF Regulation (Ref. ESMA50-43599798-9011), as published on 19 December 2023 (“2023 Guidelines”), in its administrative practices. All money market funds (MMFs) under the supervision of the CSSF and Luxembourg managers of MMFs shall duly comply with the 2023 Guidelines.

The 2023 Guidelines are appended to this Circular. The English version as well as the French and German translations are available on the ESMA website <http://www.esma.europa.eu/>.

In accordance with Article 28 of the MMF Regulation, the Guidelines issued by ESMA are to be updated at least every year in relation to the common reference parameters of the stress test scenarios considering the latest market developments. In addition, ESMA published, on 31 January 2023, a Consultation Paper on the review of the methodology set out in section 4.8 of the Guidelines.

On that basis, the 2023 Guidelines, when compared to the 2022 version, notably combine an update of the methodology to implement the scenario related to the hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF following the ESMA consultation, with the annual update of the common reference parameters for the stress test scenarios.

The 2023 Guidelines notably concern the topics summarised in Section 1 below.

## **1. Summarised presentation of the 2023 Guidelines**

Section 2 of the Final Report (ESMA50-43599798-9011 dated 19 December 2023) on the 2023 Guidelines provides some background on the rationale behind the 2023 update of the Guidelines, which have only been changed in section 4.8, including in particular in sub-section 4.8.1 on the level of changes of liquidity, and in section 5 on the calibration.

### Calibration

The updated calibration, done in collaboration with the ESRB and the ECB, was motivated by a recalibration of the risk parameters. The scenarios hence reflect the assessment of prevailing sources of systemic risks identified for the EU financial system by ESMA, the ESRB and the ECB as of November 2023.

The shocks have been calibrated to be severe, while the prevailing sources of systemic risk include a prolonged period of low growth, elevated inflation and higher interest rates, combined with deteriorating asset quality, debt sustainability concerns (households, corporates and sovereigns), disorderly asset price corrections, as well as accumulated risks in real estate. The severity of the parameters of the stress test scenarios in relation to hypothetical movements of the interest rates materially increased compared to the 2022 Guidelines, while other scenarios have been updated with a degree of severity similar to the previous exercise.

The 2023 Guidelines have the following key characteristics:

- Corporate sector profitability expectations would reflect the above-mentioned degraded economic prospects, driving credit risk premia upwards, resulting in a widening of credit spreads and rating downgrades worldwide.
- The sustained high risk-free rates, together with the prevailing pandemic-induced elevated level of government debt, would foster concerns about sovereign debt sustainability, putting further pressure on bond rates.
- Such market reaction would also trigger a sudden revaluation of other financial assets and real estate prices, in an uncertain environment characterised by high volatility. The rapid repricing of financial instruments held at fair value would amplify the liquidity stress in the economy, which would be reflected in the widening of bid-ask spreads.
- The calibration of hypothetical levels of redemptions was modified in 2020 in light of the COVID-19 crisis and these calibrated parameters are still considered appropriate and remain unchanged. Especially, they are consistent with the weekly outflows observed for MMFs during recent stress events.

### Methodology change on the liquidity stress test

The revised methodology aims at improving the common reference stress test scenario on the level of changes of liquidity in section 4.8.1 of the Guidelines by taking into account the interaction between liquidity and redemption pressures. This takes the form of a price impact representing the additional cost incurred by selling a large amount of securities in a market with few buyers. It is also seeking to improve the use of the stress-testing results to monitor the risk of contagion stemming from a shock affecting the EU MMF sector.

Finally, the 2023 Guidelines, while remaining unchanged in relation to the provisions on stress testing which the MMF or the manager of an MMF shall regularly conduct in accordance with sections 4.1 to 4.7 of the Guidelines, they still specify that the factors set out therein are minimum requirements. On that basis, MMFs or managers of MMFs have to tailor the approach to the specificities of the MMFs and add any factors or requirements that are deemed useful to the stress test exercise.

## **2. Entry into force**

Circular CSSF 23/831 implementing the 2022 version of the Guidelines is repealed and replaced by this Circular with effect as of 6 May 2024. This Circular, with the updated Guidelines, enters into force on 6 May 2024.

The CSSF expects all entities falling under the scope of this Circular to apply the 2023 Guidelines for the preparation of the required MMF reporting as from the reporting date 30 June 2024 onwards.

Yours faithfully,

**Claude WAMPACH**  
Director

**Marco ZWICK**  
Director

**Jean-Pierre FABER**  
Director

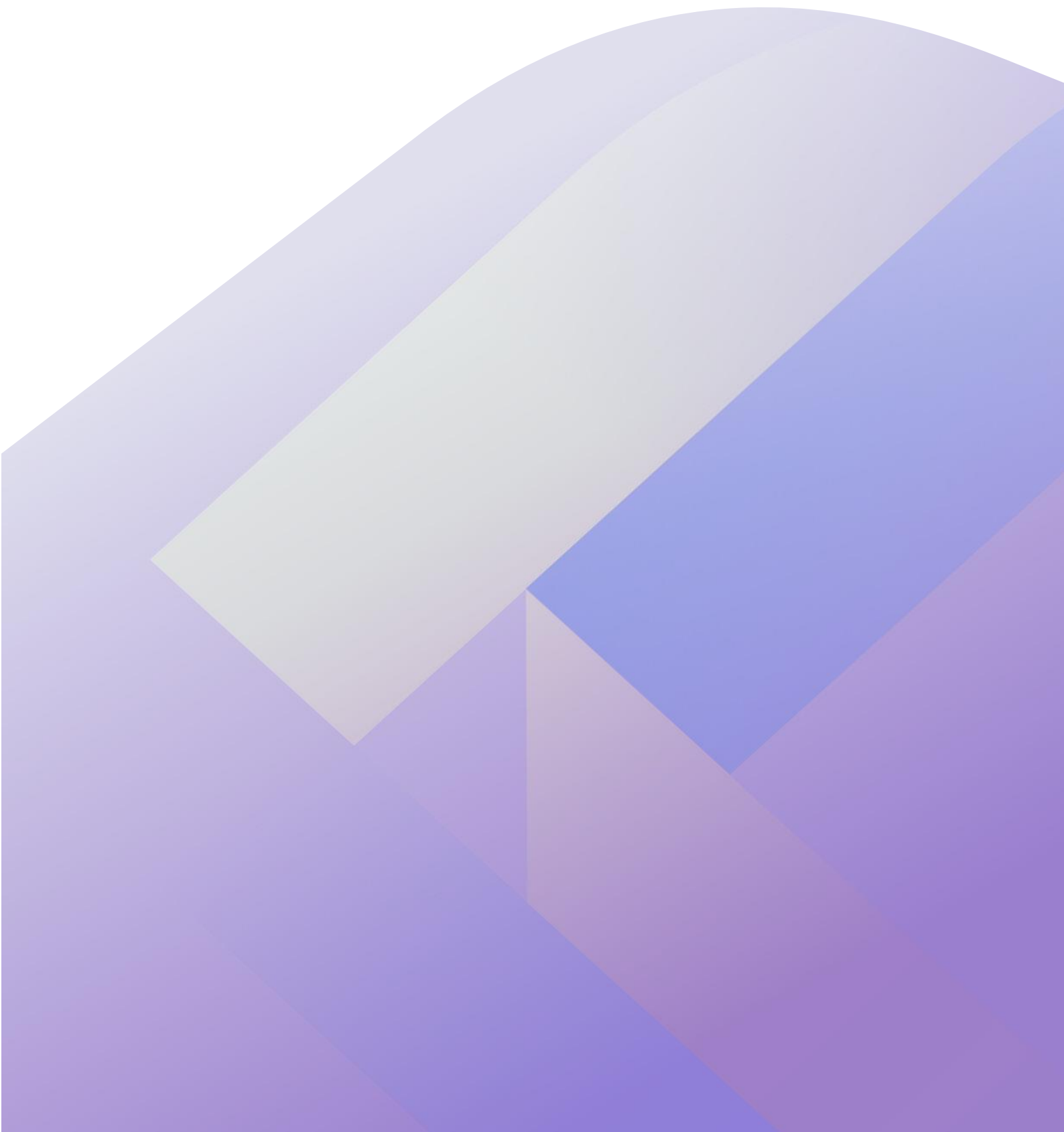
**Françoise KAUTHEN**  
Director

**Claude MARX**  
Director General

Annex                      ESMA Guidelines on stress test scenarios under the MMF Regulation (Ref. ESMA50-43599798-9011)

# Final Report

Guidelines on stress test scenarios under the MMF Regulation



## Table of Contents

1	Executive Summary .....	3
2	Background.....	5
3	Feedback on the consultation.....	8
4	Annexes .....	13
4.1	Annex I.....	13
4.2	Annex II – Guidelines on MMF stress tests .....	24
1	Scope.....	24
2	Purpose.....	24
3	The Compliance and reporting obligations.....	26
3.1	Status of the guidelines .....	26
3.2	Reporting requirements.....	26
4	Guidelines on stress test scenarios under Article 28 of the MMF Regulation (Financial market participants are not required to report results of stress tests referred to in sections 4.1 to 4.7 below).....	27
4.1	Guidelines on certain general features of the stress test scenarios of MMF .....	27
4.2	Guidelines on stress test scenarios in relation to hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF .....	30
4.3	Guidelines on stress test scenarios in relation to hypothetical changes in the level of credit risk of the assets held in the portfolio of the MMF, including credit events and rating events .....	30
4.4	Guidelines on stress test scenarios in relation to hypothetical movements of the interest rates and exchange rates .....	31
4.5	Guidelines on stress test scenarios in relation to hypothetical levels of redemption ....	32
4.6	Guidelines on stress test scenarios in relation to hypothetical widening or narrowing of spreads among indexes to which interest rates of portfolio securities are tied .....	33
4.7	Guidelines on stress test scenarios in relation to hypothetical macro systemic shocks affecting the economy as a whole .....	33

4.8	Guidelines on the establishment of additional common reference stress test scenarios (the results of which should be included in the reporting template mentioned in Article 37(4) of the MMF Regulation) .....	33
4.8.1	Level of changes of liquidity .....	34
4.8.2	Level of change of credit risk .....	36
4.8.3	Levels of change of the interest rates and exchange rates and levels of widening or narrowing of spreads among indices to which interest rates of portfolio securities are tied	37
4.8.4	Levels of redemption .....	38
4.8.5	Macro-systemic shocks affecting the economy as a whole .....	41
5	Calibration .....	44
5.1	Common reference parameters of the stress test scenarios in relation to hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF .....	45
5.2	Common reference parameters of the stress test scenarios in relation to hypothetical changes in the level of credit risk of the assets held in the portfolio of the MMF, including credit events and rating events .....	48
5.3	Common reference parameters of the stress test scenarios in relation to hypothetical movements of the interest rates .....	51
5.4	Common reference parameters of the stress test scenarios in relation to hypothetical movements of the exchange rates .....	55
5.5	Common reference parameters of the stress test scenarios in relation to hypothetical widening or narrowing of spreads among indexes to which interest rates of portfolio securities are tied .....	59
5.6	Common reference parameters of the stress test scenarios in relation to hypothetical levels of redemption .....	60
5.7	Common reference parameters of the stress test scenarios in relation to hypothetical macro systemic shocks affecting the economy as a whole .....	62
6	Appendix .....	64

## 1 Executive Summary

### Reasons for publication

Article 28 of the MMF Regulation provides that ESMA shall develop guidelines with a view to establishing common reference parameters of the stress test scenarios to be included in the stress tests that MMFs or managers of MMFs are required to conduct. These guidelines are updated at least every year taking into account the latest market developments. ESMA published the latest update of these guidelines on 30 November 2022<sup>1</sup> and their translation on 27 January 2023 (“the 2022 Guidelines” also referred to as ESMA34-49-495<sup>2</sup>).

On 31<sup>st</sup> January 2023, ESMA published a Consultation Paper (CP)<sup>3</sup> on the review of the methodology set in section 4.8 of the guidelines. The consultation closed on 28 April 2023.

This 2023 final report includes:

- Updated guidelines on the methodology to implement the scenario related to the hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF.
- Updated guidelines on specifications on the type of the stress tests and their calibration, so that managers of MMFs have the information needed to fill in the corresponding fields in the reporting template mentioned in article 37 of the MMF Regulation (section 5 of the Guidelines).

### Contents

Section 3 summarises the feedback received to the consultation that ESMA carried out and explains how ESMA has taken it into account.

Annex I sets out the cost-benefit analysis related to the updated guidelines.

Annex II contains the full text of the updated guidelines and the calibration of the scenarios for 2023 (updates in red).

### Next Steps

The Guidelines in Annex II of this report will be translated into the official EU languages and published on the ESMA website. The publication of the translations will trigger a two-month period during which NCAs must notify ESMA whether they comply or intend to comply with the guidelines.

The updated guidelines in this final report, including the new 2023 parameters, will apply 2 months after the publication of translations of the Guidelines. After the start of the application



of the updated guidelines, managers will have to report the results of the new parameters to NCAs with their quarterly reports, for the purpose of the reporting referred to in Article 37 of the MMF Regulation and set out in Commission Implementing Regulation (EU) 2018/708<sup>4</sup>. Until then, managers should use the parameters set in the 2022 Guidelines and report the results accordingly.

---

<sup>1</sup> Final Report on Guidelines on stress test scenarios under the MMF Regulation ([ESMA50-164-6583](#))

<sup>2</sup> [Guidelines on stress test scenarios under the MMF Regulation - 2022 update \(europa.eu\)](#)

<sup>3</sup> [Consultation paper on the review of the methodology included in the Guidelines on stress test scenarios under the MMF Regulation](#)

<sup>4</sup> Commission Implementing Regulation (EU) 2018/708 of 17 April 2018 laying down implementing technical standards with regard to the template to be used by managers of money market funds when reporting to competent authorities as stipulated by Article 37 of Regulation (EU) 2017/1131 of the European Parliament and of the Council (OJ L119, 15.5.2018, p. 5).

## 2 Background

Article 28(7) of the Money Market Funds Regulation (MMFR)<sup>5</sup> provides that the European Securities and Markets Authority (ESMA) shall develop guidelines with a view to establishing common reference parameters of the stress test scenarios to be included in the stress tests that Money Market Funds (MMFs) or managers of MMFs are required to conduct. These guidelines shall be updated at least every year taking into account the latest market developments. ESMA published the latest update of these guidelines on 30 November 2022 and their translation on 27 January 2023 (“the 2022 Guidelines”).

ESMA has worked in collaboration with the ESRB and the ECB for the annual calibration of the risk parameters. The scenario reflects the assessment of prevailing sources of systemic risks identified for the EU financial system as of November 2023. These include: (i) prolonged period of low growth and elevated inflation resulting in higher vulnerabilities for households and firms (ii) deteriorating asset quality and profitability prospects for the banking, (iii) a disorderly asset price correction, (iv) a re-emergence of sovereign and corporate financing risk and debt sustainability concern and (v) accumulated risks in the real estate sector. Considering that the scenarios will reflect the assessment of systemic risk by ESMA, the ESRB and the ECB, ESMA has not conducted a public consultation on the calibration of the scenario.<sup>6</sup>

On the contrary, ESMA consulted on the revision of the methodology set in section 4.8 of the guidelines from 31 January to 28 April 2023, and this consultation included also general questions to stakeholders on the full text of the Guidelines. The responses submitted on a non-confidential basis can be found on the ESMA webpage<sup>7</sup>.

The revised version of the Guidelines aims at improving the liquidity stress test by taking into account the interaction between liquidity and redemption pressures. This takes the form of a price impact representing the additional cost incurred by selling a large amount of securities in a market with few buyers.

In addition, ESMA is seeking to improve the use of the stress-testing results to monitor the risk of contagion stemming from a shock affecting the EU MMF sector. ESMA and the NCAs currently use the reporting to assess the resilience of individual MMFs, and the impact of the different risk factors on the MMF sector. To go further, ESMA is now seeking to assess spillovers beyond the MMF sector. To do so, ESMA will use the information reported as part of the macro stress test and make assumptions to model internally the potential impact on

---

<sup>5</sup> Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds (OJ L 169, 30.06.2017, p. 8).

<sup>6</sup> The previous calibrations of the stress scenarios were not part of the public consultation either.

<sup>7</sup> [Responses to the consultation](#)

other financial entities. The primary objective is to improve ESMA monitoring and to identify and measure systemic risk, in line with its mandate. While this assessment will build on data reported through the MMF reporting, it will not affect the way MMF managers implement and report the results of the scenario.

Managers of MMFs are expected to include the results of the stress tests in the reports to be sent to National Competent Authorities (NCAs) through the reporting template. The Guidelines include stress test scenarios in relation to hypothetical changes in MMFs’:

- liquidity levels;
- credit and interest rate risks;
- redemptions levels;
- widening/ narrowing of spreads among indexes to which interest rates of portfolio securities are tied; and
- macro-economic shocks.

While sections 4.8.1 on level of changes of liquidity and 5 on the calibration of the Guidelines have been updated, all the other sections of the 2022 Guidelines continue to apply, including the internal stress test exercise to be carried out by managers of MMFs. Article 28(1) of the MMFR provides that “Each MMF shall have in place sound stress testing processes that identify possible events or future changes in economic conditions which could have unfavourable effects on the MMF”. These internal stress tests could include other factors than those referred to in the 2022 Guidelines, and when designing these internal stress tests, ESMA expects that MMFs would factor in the impact of historical market stress according to the risk profile of their fund.

With respect to the 2023 update of section 5 of the Guidelines, the shocks have been calibrated to be severe, consistent with the uncertainty deriving from the economic consequences of a re-intensification or prolongation of geopolitical tensions. Such environment would fuel supply-chain disruptions leading to lower growth, but also to higher prices. Second-round effects via the wage-price spiral would further exacerbate inflationary pressures, ultimately leading to a broad re-appraisal of market’s expectations of interest rates, shifting up yield curves over the whole maturity spectrum. The resulting tightening of financing conditions, combined with higher wages and sluggish economic growth, would weigh on corporates’ profitability. Households would also experience losses in real income and face stronger borrowing costs, amid higher unemployment. Banks’ income and solvency outlook would also eventually deteriorate substantially, due to increased funding costs and defaults.

The surge in rates is further reflected in the parameters of the stress test scenarios in relation to hypothetical movements of the interest rates, whose severity materially increased compared to the 2022 Guidelines. Other scenarios have been updated with a degree of severity similar to the previous exercise.

Corporate profitability expectations would reflect these degraded prospects, driving credit risk premia upwards, and resulting in a widening of credit spreads and rating downgrades worldwide. In addition, the sustained high risk-free rates, together with the prevailing pandemic-induced elevated level of government debt, would foster concerns about sovereign debt sustainability, putting further pressure on bond rates.

Finally, such market reaction would also trigger a sudden revaluation of other financial assets and real estate prices, in an uncertain environment characterised by high volatility. The rapid repricing of financial instruments held at fair value would amplify the liquidity stress in the economy, which would be reflected in the widening of bid-ask spreads.

The calibration of the scenario in relation to hypothetical levels of redemption was modified in 2020 in light of the COVID-19 crisis. These parameters calibrated to reflect the severity of the crisis are still considered appropriate and have not been changed. Especially, they are consistent with the weekly outflows observed for MMFs during stress event in recent time.

The resulting Guidelines include unchanged provisions related to internal stress test exercise to be carried out by managers of MMFs in sections 4.1 to 4.7. The section 4.8 on the establishment of additional common reference stress test scenarios includes changes to the assessment of the level of changes of liquidity **in red**. Section 5 of the Guidelines includes updated parameters **in red** which reflect the new scenario.

### 3 Feedback on the consultation

ESMA received 6 responses<sup>8</sup> to its CP, one from an asset manager and the rest from asset managers' associations.

The following paragraphs detail the contents of the responses received on each question of the CP.

ESMA had also requested the advice of the Securities and Markets Stakeholders Group (SMSG), but the SMSG chose not to opine.

#### Summary of responses

**Q1: Do you have comments or suggestions based on your experience of the application of the current Guidelines (including credit, FX, interest rate and redemption scenarios)?**

**Q1.a: Did you encounter any difficulty or challenge in understanding the requirements of the different stress tests in the current Guidelines?**

**Q1.b: Do you deem that further clarifications are required to ensure that the current Guidelines are being implemented correctly beyond the proposals in the present Consultation Paper? If yes, please specify which parts of the Guidelines are concerned?**

Respondents generally reported that there are no challenges in understanding the current guidelines although some highlighted the resource implications of their implementation.

One respondent considered that the current calibration of the liquidity stress tests was too high and could not be easily compared with actual movements of bid-ask-spreads. Similarly, several respondents considered that the calibration of the redemption scenario was too strong and unrealistic. One respondent considered that the FX stress test is not meaningful since the entire currency risk exposure must be hedged<sup>9</sup>.

One respondent considered that the reverse redemption stress tests does not allow for comparison at industry level. The current methodology necessitates some expert judgment to implement the solution, for example to define what the "regulatory requirements" are.

---

<sup>8</sup> [Responses to the consultation](#)

<sup>9</sup> According to recital 26 of the MMFR: "In the event that an MMF invests in assets labelled in another currency than the currency of the MMF, it is expected that the manager of the MMF would hedge the entire currency risk exposure, including via derivatives".

Indeed, for the purpose of this exercise managers need to assess how much they can redeem before breaching regulatory requirements, which include at least Diversification (Article 17 of the MMF Regulation); Concentration (Article 18 of the MMF Regulation); Portfolio rules for short-term MMFs (Article 24 of the MMF Regulation) and for standard MMFs (Article 25 of the MMF Regulation), in particular Maximum weighted average maturity (WAM); Maximum weighted average life (WAL), daily maturing assets; and weekly maturing assets.

One respondent highlighted that the impact of flows was dominant in the Macro stress test in comparison to the impact of the stress on NAV.

**ESMA's response:** the responses do not reveal any major challenge in implementing the current methodology. ESMA also takes note of the comments on the calibration, and the realism of some of the underlying assumptions. ESMA may take the opportunity to re-consider those assumption in future revisions of the Guidelines. Finally, ESMA is aware of the limitations when interpreting the results of the reverse stress test, but it is considered that they are generally informative.

**Q2: Do you agree that the price impact of asset sales should be taken into account?**

Most respondents considered that the introduction of a price impact in addition to the current liquidity discount was agreeable in principle. However, all respondents highlighted the data gaps preventing the calculation of a market impact. Therefore, they generally considered that while the proposal makes sense theoretically, it may lead to inconclusive results.

**ESMA's response:** there is a broad agreement to consider that it is sensible to take the price impact of market sales into account. ESMA shares the concerns regarding the data gaps and decided to proceed with a methodology which is simple and whose calibration can be easily reviewed when new data become available.

**Q3: What are your views on the different options? Option 1: Price impact factor increases with volume sold; Option 2: Market impact factor increases with the market footprint of the MMF for each individual instrument it holds in its portfolio.**

**Q4: Do you have views on**

- the calculation of the size and market depth of the money markets MMFs invest in (eligible money market instruments)?
- the threshold in option 2 (i.e. the threshold regarding the individual asset market footprint) above which the cost of liquidating positions may increase?

**Q5: Do you have views on the price impact factor, i.e. the impact on the price of an asset (in bps) for a given amount of sales under option 1 and 2?**

**Q6: Do you have views on any other options which would allow to take into account the interaction between liquidity and redemption pressures?**

Respondents generally recognised the rationale of assessing the interaction between liquidity and fund pressure, albeit acknowledging the technical difficulty. However, some respondents also indicated that the vertical slicing assumption was not entirely realistic, since MMF could also use part of their liquidity buffer to meet redemptions.

Respondents expressed a preference for option 1, as option 2 was deemed even more difficult to calibrate due to the lack of transparency of the underlying market data. In addition, one respondent considered that option 2 made the absolute size of the fund a key and overly dominant determinant of the price impact. Another respondent rejected both options.

Under option 1, respondents generally considered that it was difficult to provide a sound estimation of the price impact factor due to data gaps, while other respondents suggested to extrapolate the calibration of the price impact factor from the price impact actually observed during the March 2020 episode.

Respondents generally considered that estimating the size and market depth was a very difficult exercise for money market instruments, due to data gaps. For that reason, no respondent provided views on the calculation of the threshold in option 2.

**ESMA's response:** Respondents expressed a preference for option 1 instead of option 2, even those who did not support the review. They highlighted a number of difficulties, in particular due to data limitation, but did not provide practical solutions to address the issues identified. In that context, ESMA staff considers that existing literature provide converging proposals that could be used for the revision of the methodology under option 1, while minimising the burden for reporting entities. Due to lack of support and alleged additional complexity in implementation, ESMA decided to discard option 2.

**Q7: Do you have views on the proposal that ESMA could use the information reported in the macro-systemic shock to assess systemic risk? Do you agree that the two options are not mutually exclusive and could be conducted in parallel?**

**Q8: Do you have views on the methodology proposed and especially:**

- the proposal to measure the systemic impact on the money market, using a price impact factor;
- the data and calibration;

- **the approach to assess spillovers to short-term issuers, including the assumption that the short-term funding would not be rolled-over;**

**Q9: Do you have views on the proposal to assess spillovers to short-term issuers? Do you have views on the data that could be used to assess short-term funding needs? Do you have views on potential rollover assumptions?**

One respondent agreed that the existing macro scenario for MMFs has not yet specifically captured macroprudential dynamics, and that it was the task of the authorities to analyse the level of systemic relevance and to consider whether and how to incorporate such potential impact in system wide stress testing to better understand collective behaviour dynamics. Another respondent supported the use of data by authorities for information and monitoring purposes in the context of systemic risk assessment.

Several respondents expressed reservations about the accuracy of the underlying market data, and therefore the extrapolation of spill-over effects onto other market participants and the broader economy.

Respondents agreed with the proposed methodology in principle but expressed doubts because the absence of accurate market-wide data would make the conclusions unreliable.

Two respondents considered that it was relevant for ESMA to assess the extent to which unusual outflows from the MMF sector are likely to have a 'spillover' impact on funding more broadly.

**ESMA's response:** Respondents highlighted the same difficulties of calibration as for the liquidity stress test, due to data limitation. In addition, some respondents expressed concerns regarding the use of the results if not based on a robust methodology. In that context, ESMA staff considers that the improvement of the methodology of the liquidity stress test will help improving the assessment of the macro stress test.

**Q10. Do you agree with the approach taken by ESMA of not including a climate scenario in the stress test methodology? And if not, please share views on how climate risks should be taken into account and calibration of parameters.**

**Q11: Do you see any possibility to include other environmental, social and governance issues in a stress test scenario?**

Respondents agreed with ESMA's position of not including a climate scenario in the stress test methodology. In addition to the limited exposure of MMFs to climate risk, respondents



pointed to the difficulty of any such related calibration. Some respondents did not exclude that such scenarios could become more relevant in the future, provided that the right data and methodology are available but were against any consideration of inclusion at this stage.

Respondents indicated that they did not see other ESG stress scenarios applicable to MMFs.

**ESMA's response:** ESMA staff observe that a climate scenario or other ESG-related stress test will not be included in the current review due to the lower relevance of some of those risks in an MMF context. However, ESMA will keep this position under review as it develops methodology around climate stress testing in line with its recent mandates from the European Commission in this area, including on the ongoing one-off fit-for-55 climate risk scenario analysis<sup>10</sup>.

**Q12: What are your views on the costs and benefits of the 2 options? Option 1: Price impact factor increases with volume sold; Option 2: Market impact factor.**

**Q13: What are your views on the costs and benefits of the 2 options? Option 1: Systemic impact on the money market; Option 2: Spillovers to short term issuers.**

As expressed in the response to Q2, respondents generally consider the approach relevant in theory but both options difficult to calibrate, with a preference for option 1.

As expressed in the response to Q2 and Q7, respondents generally consider both options difficult to calibrate and expressed concerns about the conclusion that ESMA could draw from a systemic stress test.

**ESMA's response:** the responses to questions 12 and 13 confirm that option 1 would be easier to implement than option 2. Regarding the macro scenario, ESMA takes note of the concerns expressed.

---

<sup>10</sup> The relevant stress testing mandates are in European Commission (2021), [Strategy for Financing the Transition to a Sustainable Economy \(COM/2021/390 final\)](#). For the detailed mandate for the one-off fit-for-55 climate risk scenario analysis, see European Commission (2023), [Request for a one-off scenario analysis exercise](#).

## 4 Annexes

### 4.1 Annex I

#### Cost-benefit analysis

The following options were identified and analysed by ESMA to address the policy objectives of the guidelines required under the MMF Regulation.

#### **1. Guidelines under Article 28(1)(a) of the MMF Regulation (hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF)**

The baseline scenario should be understood for this Cost-Benefit Analysis (CBA) as the application of the requirements in the Level 1 Regulation (i.e. the provisions of Article 28 of the MMF Regulation) and in the ESMA Guidelines without any further modification. Managers of MMFs would apply the discount factors specified in section 5 of the guidelines<sup>11</sup> to reflect the increase in liquidity premia due to deterioration of market liquidity conditions in a stress scenario. For each relevant transferable security, the discount factors should be applied to the price used for the valuation of the fund at the time of the reporting.

This approach is harmonised, leading to comparable results across MMFs. However, at the moment, the interaction between asset liquidity and redemption is not taken into account, which is not realistic compared to past stress episodes. Both of the proposed options suggest taking into account the interaction between liquidity and redemption pressures.

The CBA is mostly qualitative, due to the data limitations regarding implementation costs. However, both option 1 and 2 of the liquidity stress test only represent an adjustment of the existing framework with no additional cost on an ongoing-basis. In that context, the implementation costs were considered proportionate to the objective of better measuring liquidity risk.

ESMA considered the inclusion of innovation and environmental, social and governance related factors in the risk stress testing methodology. Especially climate risk has been identified as generally relevant for the asset management sector. However, due to the long term nature of the risks and the short term nature of the MMF, ESMA did not identify an impact of climate risk in the 2 scenarios considered for consultation.

---

<sup>11</sup> The discount factor is calibrated on bid-ask spreads.

<p><b>Policy Objective</b></p>	<p>Under Article 37(4), the MMF Regulation indicates that managers of MMFs should conduct common reference stress test scenarios and report the results in the reporting template mentioned in article 37(4) of the MMF Regulation. The MMF Regulation specifies that the different risk factors shall be taken in consideration in the stress test scenarios, including:</p> <p>a. hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF;</p> <p>Under Article 28(7) of the MMF Regulation ESMA is requested to develop guidelines:</p> <p>A. that establish common reference parameters of the stress test scenarios;</p> <p>B. that are updated at least every year taking into account the latest market developments.</p>
<p><b>Baseline scenario</b></p>	<p>Managers of MMFs would apply the discount factors specified in section 5 of the guidelines to reflect the increase in liquidity premia due to deterioration of market liquidity conditions in a stress scenario. For each relevant transferable security, the discount factors should be applied to the price used for the valuation of the fund at the time of the reporting.</p> <p>This approach is harmonised, leading to comparable results across MMFs. However, at the moment, the interaction between asset liquidity and redemption is not taken into account, which is different compared to past stress episodes.</p>
<p><b>Option 1</b></p>	<p>Managers of MMFs should apply the discount factors specified in section 5 of the guidelines to reflect the increase in liquidity premia due to deterioration of market liquidity conditions in a stress scenario.</p> <p>At the same time, managers of MMFs should assume redemption requests and simulate the sale of a vertical slice of the fund portfolio whereby the same percentage of each asset is sold to meet redemptions. The redemption requests are calibrated according to the redemption scenario specified in section 5 of the guidelines.</p> <p>Asset sales would impact asset prices. The “price impact parameter” is the impact on the price of an asset for a given amount of sales. The more the fund sells an asset, the more it impacts the price of the given (“price</p>

	<p>impact factor”). For each asset, MMFs should apply the price impact parameter specified in section 5 of the guidelines:</p> <p>Finally, the manager of the MMF should estimate the impact of the potential losses by valuing the remaining investment portfolio at the derived adjusted price to determine the stressed NAV; (b) valuing assets sold at the derived adjusted price; and (c) calculating the impact as the difference between the reporting NAV and the sum of the stress NAV and the asset sales, in percentage of the reporting NAV.</p>
<p><b>Option 2</b></p>	<p>Managers of MMFs should apply the discount factors specified in section 5 of the guidelines to reflect the increase in liquidity premia due to deterioration of market liquidity conditions in a stress scenario.</p> <p>At the same time, managers of MMFs should assume redemption requests and simulate the sale of a vertical slice of the fund portfolio whereby the same percentage of each asset is sold to meet redemptions. The redemption requests are calibrated according to the redemption scenario specified in section 5 of the guidelines.</p> <p>Asset sales would impact asset prices, based on the MMF market share. The “market footprint discount” is the impact on the price of an asset for a given amount of sales. The higher the market footprint of an asset, the more it impacts the price of the given (“market footprint discount”). For each individual asset, MMFs should apply the market footprint discount that will be specified in section 5 of the guidelines:</p> <ul style="list-style-type: none"> <li>- If the market footprint of an individual asset is below a threshold <math>\alpha</math> specified in the section 5 of the Guidelines, the stress has no impact.</li> <li>- If the market footprint of an individual asset exceeds the threshold, the applied discount is a function <math>f</math> of the market footprint, calibrated by ESMA, multiplied by the value of asset sales.</li> </ul> <p>Finally, the manager of the MMF should estimate the impact of the potential losses by (a) valuing the investment portfolio at the derived adjusted price to determine the stressed NAV; (b) valuing assets sold at the derived adjusted price; and (c) calculating the impact as the difference</p>

	between the reporting NAV and the sum of the stress NAV and the asset sales, in percentage of the reporting NAV.
<b>Preferred Option</b>	Both options would address the interaction between liquidity and redemption pressures. ESMA will proceed with option 1 due to its estimated lower cost of implementation for supervised entities and regulators.

<b>Option 1</b>	Description
Benefits	<p>Stress scenarios simulate severe but plausible shocks. In the case of MMFs, a severe but plausible scenario is the correlation between a liquidity shock on the asset side and redemption requests. In turn, redemption requests lead to asset sales which exacerbate the initial liquidity stress.</p> <p>To take into account the interaction between liquidity and redemption pressures, ESMA suggests introducing a price impact representing the additional cost incurred by selling large amount of securities in a market with few buyers. For each asset, this interaction depends on the MMF market footprint and the depth of the underlying market.</p> <p>This approach is considered to be both more severe and more plausible than the current approach. In particular, it is more appropriate to simulate the COVID-19 related stress of March 2020.</p>
Costs to regulator	<p>The impact of the scenario will depend on the calibration of the price impact factor. This will necessitate development work on the regulators' side (both ESMA and National Competent Authorities) with an impact on staff estimated as below 1 FTE before implementation.</p> <p>No additional IT resources will be involved.</p>
Compliance costs	<p>Compared with the current framework, the proposed approach would necessitate additional steps and therefore implementation costs:</p> <ul style="list-style-type: none"> <li>• An assessment of asset sales in response to redemption requests.</li> <li>• An assessment of the asset sale impact on market prices.</li> </ul>

	On the other hand, the implementation cost would be reduced by the fact that part of the relevant information (esp. portfolio information, outflows) is already collected for the purpose of the current stress test Guidelines.
ESG-related aspects	<p>Climate risk is relevant in general for investment funds. However, the specificity of MMFs make it less relevant in the context of MMF stress tests:</p> <ul style="list-style-type: none"> <li>• MMFs are exposed to risks materialising in the short term while climate-related risks are more long term.</li> <li>• MMFs exposures are predominantly towards financial institutions and government, with less sectoral diversification compared to other funds.</li> </ul>
Proportionality-related aspects	The option has identified benefits, as it will improve the plausibility of the scenario, and limited costs, taking into account the framework already in place.

<b>Option 2</b>	Description
Benefits	<p>Stress scenarios simulate severe but plausible shocks. In the case of MMFs, a severe but plausible scenario is the correlation between a liquidity shock on the asset side and redemption requests. In turn, redemption requests lead to asset sales which exacerbate the initial liquidity stress.</p> <p>To take into account the interaction between liquidity and redemption pressures, ESMA suggests introducing a price impact representing the additional cost incurred by selling assets with a high market footprint.</p> <p>This approach is considered to be both more severe and more plausible than the current approach. Especially, it is more appropriate to simulate the COVID-19 related stress of March 2020.</p>
Costs to regulator	The impact of the scenario will depend on the calibration of a threshold by asset and an impact function. This will necessitate

	<p>development work on the regulator side with an impact on staff estimated as close to 1 FTE before implementation.</p> <p>No additional IT resources will be involved.</p>
Compliance costs	<p>Compared with the current framework, the proposed approach would necessitate additional steps and therefore implementation costs:</p> <ul style="list-style-type: none"> <li>• An assessment of asset sales in response to redemption requests.</li> <li>• An assessment of the asset market footprint against the threshold</li> <li>• An assessment of the price impact based on the impact function</li> </ul> <p>On the other hand, the implementation cost would be reduced by the fact that part of the relevant information (esp. portfolio information, outflows) is already collected for the purpose of the current stress test Guidelines.</p>
ESG-related aspects	<p>Climate risk is relevant in general for investment funds. However, the specificity of MMFs make it less relevant in the context of MMF stress tests:</p> <ul style="list-style-type: none"> <li>• MMFs are exposed to risks materialising in the short term while climate-related risks are more long term.</li> <li>• MMFs exposures are predominantly towards financial institutions and government, with less sectoral diversification compared to other funds.</li> </ul>
Proportionality-related aspects	<p>The option has identified benefit as it will improve the plausibility of the scenario, and limited costs, taking into account the framework already in place.</p>

## 2. Guidelines under Article 28(1)(f) of the MMF Regulation (hypothetical macro systemic shocks affecting the economy as a whole.

The baseline scenario should be understood for this CBA as the application of the requirements in the Level 1 Regulation (i.e. the provisions of Article 28 of the MMF Regulation) and in the ESMA Guidelines without any further modification.

The scenario would remain the combination of the consistent shocks specified in the macro scenario designed by the ESRB and the ECB, and the redemption shock calibrated by ESMA.

A macro systemic shock causes an abrupt and sizeable repricing of risk premia in global financial markets characterised by a sharp increase in short term interest rate including swap rate, government bond yields and corporate bond yields and an adverse FX shock. In the wake of the market shock, liquidity demand rises sharply and investors ask for redemption. Outflows are calculated similarly to the redemption scenario by differentiating professional and retail investors. To meet the redemption requests, the fund sells assets in a stressed environment characterised by a widening of bid-ask spread as in the liquidity stress test. For the purposes of the stress test, the loss is entirely borne by remaining investors (and not by redeeming investors).

However, the scenario does not specifically capture the macroprudential dynamics and systemic risk, including potential contagion effects to other market participants. Both proposed options suggest assessing the macroprudential impact on the market and contagion effects to other market participants.

The CBA is mostly qualitative. In both options the costs will be only borne by regulators. ESMA did not identify an impact of innovation factors or environmental, social and governance related factors on the systemic impact on the market and contagion to other market participants.

<p><b>Policy</b></p> <p><b>Objective</b></p>	<p>Under Article 37(4), the MMF Regulation indicates that managers of MMFs should conduct common reference stress test scenarios and report the results in the reporting template mentioned in article 37(4) of the MMF Regulation. The MMF Regulation specifies that the different risk factors shall be taken in consideration in the stress test scenarios, including:</p> <p style="padding-left: 40px;"><b>f.</b> hypothetical macro systemic shocks affecting the economy as a whole.</p> <p>Under Article 28(7) of the MMF Regulation ESMA is requested to develop guidelines:</p> <p style="padding-left: 40px;"><b>A.</b> that establish common reference parameters of the stress test scenarios;</p>
--	---



	<p><b>B.</b> that are updated at least every year taking into account the latest market developments.</p>
<p><b>Baseline scenario</b></p>	<p>The scenario would remain the combination of the consistent shocks specified in the macro scenario designed by the ESRB and the ECB, and the redemption shock calibrated by ESMA.</p> <p>A macro systemic shock causes an abrupt and sizeable repricing of risk premia in global financial markets characterized by a sharp increase in short term interest rate including swap rate, government bond yields and corporate bond yields and an adverse FX shock.</p> <p>In the wake of the market shock, liquidity demand rises sharply and investors ask for redemption. Outflows are calculated similarly to the redemption scenario by differentiating professional and retail investors.</p> <p>To meet the redemption requests, the fund sells assets in a stressed environment characterised by a widening of bid-ask spread as in the liquidity stress test. For the purposes of the stress test, the loss is entirely borne by remaining investors (and not by redeeming investors).</p>
<p><b>Option 1</b></p>	<p>In option 1, managers of MMFs should apply the scenario in the same way as in the current Guidelines.</p> <p>ESMA would then use the information reported as an input to assess the systemic impact on the money market, without changing the Guidelines.</p> <p>ESMA would use the outflows reported by MMF managers in the macro scenario (the “input factor”) and the portfolio information reported by MMF managers, to estimate and aggregate the asset sales in response, assuming a vertical slicing of fund portfolios whereby the same percentage of each asset is sold to meet redemptions.</p> <p>ESMA would assess the impact on asset prices. The more the fund will sell an asset, the more it will impact the price of the given asset (“price impact factor”). Considering the heterogeneity of liquidity in the market, the price impact factor may differ for each market. The price impact factor will be based on the best available estimates of price impact parameter, where the price impact parameter is the impact on the price of an asset (in bps) for a given amount of sales.</p>

	<p>Finally, ESMA would use the results to assess the impact on (1) money market instruments and (2) MMFs. Especially, it may allow to identify funds which are more impacted by a systemic stress than an idiosyncratic stress (e.g. because they are exposed to a money market instrument more affected by the aggregated sales).</p>
<b>Option 2</b>	<p>In option 2, managers of MMFs should apply the scenario in the same way as in the current Guidelines.</p> <p>ESMA would then use the information reported as an input to assess the systemic impact on the money market, without changing the Guidelines.</p> <p>ESMA would use the outflows reported by MMF managers in the macro scenario (the “input factor”) and the portfolio information reported by MMF managers, to estimate and aggregate the asset sales in response, assuming a vertical slicing of fund portfolios whereby the same percentage of each asset is sold to meet redemptions.</p> <p>ESMA would aggregate asset sales of all MMFs by issuer category, reported under item (A.6.7) of MMF Reporting “Information on the assets held in the portfolio of the MMF”. For each issuer, this would represent a potential reduction in short-term funding.</p> <p>ESMA will assess the impact on each issuer category and compare it with the funding needs of the counterpart category, based on external data (e.g. EU bank short-term funding). Assuming that issuers cannot rollover their short-term debt they may experience a funding gap. The MMF stress could then spill over to other entities.</p>
<b>Preferred Option</b>	<p>ESMA suggests implementing both options, which are not mutually exclusive.</p>

<b>Option 1</b>	Description
Benefits	<p>The current scenario does not specifically capture the macroprudential dynamics (esp. impact to and from other market participants). While a revision of MMF Regulation could eventually take this issue into account, ESMA suggests using the reported</p>

	<p>information as an input to assess the systemic impact on the money market, without changing the Guidelines.</p> <p>While the current Guidelines provide information on the individual resilience of MMFs, this would allow ESMA to assess the impact on the money market itself, and to identify funds which are more impacted by a systemic stress than an idiosyncratic stress (e.g. because they are exposed to a money market instrument more affected by the aggregated sales).</p>
Costs to regulator	The implementation cost would be borne by ESMA, less than 1 FTE including development and implementation costs.
Compliance costs	Compared with the current framework, the proposed approach would not cause additional costs to managers of MMFs.
ESG-related aspects	<p>Climate risk is relevant in general for investment funds. However, the specificity of MMFs makes climate risk less relevant in the context of MMF stress tests:</p> <ul style="list-style-type: none"> <li>• MMFs are exposed to risks materialising in the short term while climate-related risks are more long term.</li> <li>• MMFs exposures are predominantly towards financial institutions and government, with less sectoral diversification compared to other funds.</li> </ul>
Proportionality-related aspects	The option has identified benefit and limited costs, taking into account the framework already in place.
<b>Option 2</b>	<b>Description</b>
Benefits	<p>The current scenario does not specifically capture the macroprudential dynamics (esp. impact to and from other market participants). While a revision of MMF Regulation could eventually take this issue into account, ESMA suggests using the reported information as an input to assess the systemic impact on the money market, without changing the Guidelines.</p> <p>While the current Guidelines provide information on the individual resilience of MMFs, this would allow ESMA to assess the impact on the funding needs of the counterpart category (the issuers). Assuming</p>

	that issuers cannot rollover their short-term debt they may experience a funding gap. The MMF stress could them spill over to other entities.
Costs to regulator	The implementation cost would be borne by ESMA, less than 1 FTE including development and implementation costs.
Compliance costs	Compared with the current framework, the proposed approach would not cause additional costs to managers of MMFs.
ESG-related aspects	<p>Climate risk is relevant in general for investment funds. However, the specificity of MMFs makes climate risk less relevant in the context of MMF stress tests:</p> <ul style="list-style-type: none"> <li>• MMFs are exposed to risks materialising in the short term while climate-related risks are more long term.</li> <li>• MMFs exposures are predominantly towards financial institutions and government, with less sectoral diversification compared to other funds.</li> </ul>
Proportionality-related aspects	The option has identified benefit and limited costs, taking into account the framework already in place.

## 4.2 Annex II – Guidelines on MMF stress tests

### **Guidelines on MMF stress tests (updates in red indicate additional text added, parameter updates or amendments which constitute the 2023 update to the ESMA34-49-115 Guidelines)**

## 1 Scope

### Who?

These guidelines apply to competent authorities, money market funds and managers of money market funds as defined in the MMF Regulation<sup>12</sup>.

### What?

These guidelines apply in relation to Article 28 of the MMF Regulation and establish common reference parameters for the stress test scenarios to be included in the stress tests conducted by MMFs or managers of MMFs in accordance with that Article.

### When?

These guidelines apply from two months after the date of publication of the guidelines on ESMA's website in all EU official languages (**with respect to parts in red** – the other parts of the Guidelines already apply from the dates specified in Articles 44 and 47 of the MMF Regulation).

## 2 Purpose

The purpose of these guidelines is to ensure common, uniform and consistent application of the provisions in Article 28 of the MMF Regulation. In particular, and as specified in Article 28(7) of the MMF Regulation, they establish common reference parameters of the stress test scenarios to be included in the stress tests taking into account the following factors specified in Article 28(1) of the MMF Regulation:

---

<sup>12</sup> Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds (OJ L 169, 30.06.2017, p. 8).

- a) hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF;
- b) hypothetical changes in the level of credit risk of the assets held in the portfolio of the MMF, including credit events and rating events;
- c) hypothetical movements of the interest rates and exchange rates;
- d) hypothetical levels of redemption;
- e) hypothetical widening or narrowing of spreads among indexes to which interest rates of portfolio securities are tied;
- f) hypothetical macro systemic shocks affecting the economy as a whole.

In accordance with Article 28(7) MMF Regulation, these guidelines will be updated at least every year taking into account the latest market developments. **In 2023, sections 4.8 and 5 of these guidelines were in particular updated** so that managers of MMFs have the information needed to fill in the corresponding fields in the reporting template referred to in Article 37 of the MMF Regulation, as specified by Commission Implementing Regulation (EU) 2018/708<sup>13</sup>. This information includes specifications on the types of stress tests mentioned in section 5 and their calibration.

## 3 The Compliance and reporting obligations

### 3.1 Status of the guidelines

In accordance with Article 16(3) of the ESMA Regulation, competent authorities and financial market participants must make every effort to comply with these guidelines.

Competent authorities to which these guidelines apply should comply by incorporating them into their national legal and/or supervisory frameworks as appropriate, including where particular guidelines are directed primarily at financial market participants. In this case, competent authorities should ensure through their supervision that financial market participants comply with the guidelines.

### 3.2 Reporting requirements

Within two months of the date of publication of the guidelines on ESMA's website in all EU official languages, competent authorities to which these guidelines apply must notify ESMA whether they (i) comply, (ii) do not comply, but intend to comply, or (iii) do not comply and do not intend to comply with the guidelines.

In case of non-compliance, competent authorities must also notify ESMA within two months of the date of publication of the guidelines on ESMA's website in all EU official languages of their reasons for not complying with the guidelines.

A template for notifications is available on ESMA's website. Once the template has been filled in, it shall be transmitted to ESMA.

## **4 Guidelines on stress test scenarios under Article 28 of the MMF Regulation (Financial market participants are not required to report results of stress tests referred to in sections 4.1 to 4.7 below)**

### **4.1 Guidelines on certain general features of the stress test scenarios of MMF**

#### Scope of the effects on the MMF of the proposed stress test scenarios

Article 28(1) of the MMF Regulation requires MMFs to put in place “sound stress testing processes that identify possible events or future changes in economic conditions which could have unfavourable effects on the MMF”.

This leaves room for interpretation on the exact meaning of the “effects on the MMF”, such as:

- impact on the portfolio or net asset value of the MMF,
- impact on the minimum amount of liquid assets that mature daily or weekly as referred to in Article 24(c) to 24(h) and Article 25(c) to 25(e) of the MMF Regulation,
- impact on the ability of the manager of the MMF to meet investors’ redemption requests,
- impact on the difference between the constant NAV per unit or share and the NAV per unit or share (as explicitly mentioned in Article 28(2) of the MMF Regulation in the case of CNAV and LVNAV MMFs),
- impact on the ability of the manager to comply with the different diversification rules as specified in Article 17 of the MMF Regulation.

The wording of Article 28(1) of the MMF Regulation should include various possible definitions. In particular, the stress test scenarios referred to in Article 28 of the MMF Regulation should test the impact of the various factors listed in Article 28(1) of the MMF Regulation on both i) the portfolio or net asset value of the MMF and ii) the liquidity bucket(s) of the MMF and/or the ability of the manager of the MMF to meet investors’ redemption requests. This broad interpretation is in line with the stress-testing framework of the AIFMD, which includes both meanings in its Articles 15(3)(b) and 16(1). The specifications included



in the following sections 4.2 to 4.7 therefore apply to stress test scenarios on both aspects mentioned above.

With respect to liquidity, it is to be noted that liquidity risk may result from: (i) significant redemptions; (ii) deterioration of the liquidity of assets; or (iii) a combination of the two.

#### Historical scenarios and hypothetical scenarios

With respect to both stress test scenarios on i) the portfolio or net asset value of the MMF and ii) the liquidity bucket(s) of the MMF and/or the ability of the manager of the MMF to meet investors' redemption requests, managers could use the factors specified in sections 4.2 to 4.7 using historical and hypothetical scenarios.

Historical scenarios reproduce the parameters of previous event or crises and extrapolate the impact they would have had on the present portfolio of the MMF.

While using historical scenarios, managers should vary the time windows in order to process several scenarios and avoid getting stress test results that depend overly on an arbitrary time window (e.g. one period with low interest rates and another with higher rates). By way of example, some commonly used scenarios refer to junk bonds in 2001, subprime mortgages in 2007, the Greek crisis in 2009 and the Chinese stock market crash in 2015. These scenarios may include independent or correlated shocks depending on the model.

Hypothetical scenarios are aimed at anticipating a specific event or crisis by setting its parameters and predicting its impact on the MMF. Examples of hypothetical scenarios include those based on economic and financial shocks, country or business risk (e.g. bankruptcy of a sovereign state or crash in an industrial sector). This type of scenario may require the creation of a dashboard of all changed risk factors, a correlation matrix and a choice of financial behaviour model. It also includes probabilistic scenarios based on implied volatility.

Such scenarios may be single-factor or multi-factor scenarios. Factors can be uncorrelated (fixed income, equity, counterparty, forex, volatility, correlation, etc.) or correlated: a particular shock may spread to all risk factors, depending on the correlation table used.

#### Aggregation of stress tests

In certain circumstances, in addition, managers could use aggregate stress test scenarios on a range of MMFs or even on all the MMFs managed by the manager. Aggregating results would provide an overview and could show, for example, the total volume of assets held by all the MMFs of the manager in a particular position, and the potential impact of several portfolios selling out of that position at the same time during a liquidity crisis.

#### Reverse stress testing

In addition to the stress test scenarios discussed in this section, the inclusion of reverse stress testing may also be of benefit. The intention behind a reverse stress test is to subject the MMF to stress testing scenarios to the point of failure, including the point where the regulatory thresholds set up in the MMF Regulation, such as those included in its Article 37(3)(a) would be breached. This would allow the manager of a MMF to have another tool to explore any vulnerabilities, pre-empt, and resolve such risks.

#### Combination of the various factors mentioned in the following sections 4.2 to 4.7 with investors' redemption requests

All factors mentioned in the following sections 4.2 to 4.7 should be tested against several levels of redemption. This is not to say that at first, managers should not also test them separately (without combining them with tests against levels of redemption), in order to be able to identify the corresponding respective impacts. The way this combination of the various factors mentioned in the following sections 4.2 to 4.7 with investors' redemption requests could be carried out is further specified in each of these sections.

In that context, some hypothesis on the behaviour of the manager with regard to honouring the redemption requests could be required.

A practical example of one possible implementation is given in Appendix.

#### Stress tests in the case of CNAV and LVNAV MMFs

Article 28(2) of the MMF Regulation indicates that in addition to the stress test criteria as set out in Article 28(1), CNAV and LVNAV MMFs shall estimate for different scenarios, the difference between the constant NAV per unit or share and the NAV per unit or share. While estimating this difference, and if the manager of the MMF is of the view that this would be useful additional information, it may also be relevant to estimate the impact of the relevant factors included in sections 4.2 to 4.7 on the volatility of the portfolio or on the volatility of the net asset value of the fund.

#### Non-exhaustiveness of the factors mentioned in the following sections 4.2 to 4.7

The factors set out in the following sections 4.2 to 4.7 are minimum requirements. The manager would be expected to tailor the approach to the specificities of its MMFs and add any factors or requirements that it would deem useful to the stress test exercise. Examples of other factors that could be taken into account include the repo rate considering MMFs are a significant player in that market.

More generally the manager should build a number of scenarios, with different levels of severity, which would combine all the relevant factors (which is to say that there should not

just be separate stress tests for each factor – please also refer to the following sections 4.2 to 4.7).

## **4.2 Guidelines on stress test scenarios in relation to hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF**

With respect to the level of changes of liquidity of the assets mentioned in Article 28(1)(a) of the MMF Regulation, managers could consider such parameters as:

- the gap between the bid and ask prices;
- the trading volumes;
- the maturity profile of assets;
- the number of counterparties active in the secondary market. This would reflect the fact that lack of liquidity of assets may result from secondary markets related issues, but may also be related to the maturity of the asset.

The manager could also consider a stress test scenario that would reflect an extreme event of liquidity shortfall due to dramatic redemptions, by combining the liquidity stress test with a bid - ask spread multiplied by a certain factor while assuming a certain redemption rate of the NAV

## **4.3 Guidelines on stress test scenarios in relation to hypothetical changes in the level of credit risk of the assets held in the portfolio of the MMF, including credit events and rating events**

With respect to the levels of changes in credit risk of the asset mentioned in Article 28(1)(b), guidance on this factor should not be too prescriptive because the widening or narrowing of credit spreads is usually based on quickly evolving market conditions.

However, managers could, for example, consider:

- the downgrade or default of particular portfolio security positions, each representing relevant exposures in the MMF's portfolio;
- the default of the biggest position of the portfolio combined with a downgrade of the ratings of assets within the portfolio;

- parallels shifts of the credit spreads of a certain level for all assets held in the portfolio.

With respect to such stress tests involving the levels of changes of credit risk of the asset, it would also be relevant to consider the impact of such stress tests on the credit quality assessment of the corresponding asset in the context of the methodology described in Article 19 of the MMF Regulation.

The manager should, for the purpose of combining different factors, combine changes to the level of credit risk of the assets held in the portfolio of the MMF with given levels of redemptions. The manager could consider a stress test scenario that would reflect an extreme event of stress due to uncertainty about the solvency of market participants, which would lead to increased risk premia and a flight to quality. This stress test scenario would combine the default of a certain percentage of the portfolio with spreads going up together while assuming a certain redemption rate of the NAV.

The manager could also consider a stress test scenario that would combine a default of a certain percentage of the value of the portfolio with an increase in short term interest rates and a certain redemption rate of the NAV.

#### **4.4 Guidelines on stress test scenarios in relation to hypothetical movements of the interest rates and exchange rates**

With respect to the levels of change of the interest rates and exchange rates mentioned in Article 28(1)(c) of the MMF Regulation, managers could consider stress testing of parallel shifts of a certain level. More specifically, managers could consider depending on the specific nature of their strategy:

- i. an increase in the level of short term interest rates with 1-month and 3-month treasury rates going up simultaneously while assuming a certain redemption rate;
- ii. a gradual increase in the long term interest rates for sovereign bonds;
- iii. a parallel and/or non parallel shift in the interest rate curve that would change short, medium and long interest rate;
- iv. movements of the FX rate (base currency vs other currencies).

The manager could also consider a stress test scenario that would reflect an extreme event of increased interest rates that would combine an increase in short-term interest rates with a

certain redemption rate. The manager could also consider a matrix of interest rates / credit spreads.

#### **4.5 Guidelines on stress test scenarios in relation to hypothetical levels of redemption**

With respect to the levels of redemption mentioned in Article 28(1)(d) of the MMF Regulation, managers could consider redemption stress tests following from historical or hypothetical redemption levels or with the redemption being the maximum of either a certain percentage of the NAV or an opt-out redemption option exercised by the most important investors.

Stress tests on redemptions should include the specific measures which the MMF has the constitutional power to activate (for instance, gates and redemption notice).

The simulation of redemptions should be calibrated based on stability analysis of the liabilities (i.e. the capital), which itself depends on the type of investor (institutional, retail, private bank, etc.) and the concentration of the liabilities. The particular characteristics of the liabilities and any cyclical changes to redemptions would need to be taken into account when establishing redemption scenarios. However, there are many ways to test liabilities and redemptions. Examples of significant redemption scenarios include i) redemptions of a percentage of the liabilities ii) redemptions equal to the largest redemptions ever seen iii) redemptions based on an investor behaviour model.

Redemptions of a percentage of the liabilities could be defined based on the frequency of calculating the net asset value, any redemption notice period and the type of investors.

It is to be noted that liquidating positions without distorting portfolio allocation requires a technique known as slicing, whereby the same percentage of each asset (or each liquidity class if the assets are categorised according to their liquidity, also known as bucketing) is sold, rather than selling the most liquid assets first. The design and execution of the stress test should take into account and specify whether to apply a slicing approach or by contrast a waterfall approach (i.e. selling the most liquid assets first).

In the case of redemption of units by the largest investor(s), rather than defining an arbitrary redemption percentage as in the previous case, managers could use information about the investor base of the MMF to refine the stress test. Specifically, the scenario involving redemption of units by the largest investors should be calibrated based on the concentration of the fund's liabilities and the relationships between the manager and the principal investors of the MMF (and the extent to which investors' behaviour is deemed volatile).

Managers could also stress test scenarios involving redemptions equal to the largest redemptions ever seen in a group of similar (geographically or in terms of fund type) MMFs

or across all the funds managed by the manager. However, the largest redemptions witnessed in the past are not necessarily a reliable indicator of the worst redemptions that may occur in the future.

A practical example of one possible implementation is given in Appendix.

#### **4.6 Guidelines on stress test scenarios in relation to hypothetical widening or narrowing of spreads among indexes to which interest rates of portfolio securities are tied**

With respect to the extent of a widening or narrowing of spreads among indexes to which interest rates of portfolio securities are tied as mentioned in Article 28(1)(e) of the MMF Regulation, managers could consider the widening of spreads in various sectors to which the portfolio of the MMF is exposed, in combination with various increase in shareholder redemptions. Managers could in particular consider a widening of spreads going up.

#### **4.7 Guidelines on stress test scenarios in relation to hypothetical macro systemic shocks affecting the economy as a whole**

With respect to the identification of macro-systemic shocks affecting the economy as a whole mentioned in Article 28(1)(f) of the MMF Regulation, guidance on this item should not be prescriptive because the choice of hypothetical macro systemic shocks will depend to a large extent on the latest developments in the market.

However, ESMA is of the view that managers could use an adverse scenario in relation to the GDP. Managers could also replicate macro systemic shocks that affected the economy as a whole in the past.

Examples of such global stress test scenarios that the manager could consider are provided in Appendix.

#### **4.8 Guidelines on the establishment of additional common reference stress test scenarios (the results of which should be included in the reporting template mentioned in Article 37(4) of the MMF Regulation)**

In addition to the stress tests managers of MMFs conduct taking into account sections 4.1 to 4.7 of these guidelines, managers of MMFs should conduct the following common reference stress test scenarios. the results of which should be included in the reporting template mentioned in Article 37(4) of the MMF Regulation.

#### 4.8.1 Level of changes of liquidity

With respect to the level of changes of liquidity of the assets mentioned in Article 28(1)(a) of the MMF Regulation:

- Managers of MMFs should apply the discount factors specified in section 5 of the guidelines<sup>14</sup> to reflect the increase in liquidity premia due to deterioration of market liquidity conditions in a stress scenario.
- At the same time, managers of MMFs should assume redemption requests and simulate the sale of a vertical slice of the fund portfolio whereby the same percentage of each asset is sold to meet redemptions. The redemption requests are calibrated according to the redemption scenario specified in section 5 of the guidelines.
- Asset sales would impact asset prices. The “price impact parameter” is the impact on the price of an asset for a given amount of sales. The more the fund sells an asset, the more it impacts the price of the given (“price impact factor”). For each asset, managers of MMFs should apply the price impact parameter specified in section 5 of the guidelines:

$$\text{Price impact factor} = \text{price impact parameter} * \text{asset sales}$$

- For each relevant transferable security, managers of MMFs should apply the discount factors and the price impact factors to the price used for the valuation of the fund at the time of the reporting (VPrice) in accordance with Article 29(3)(a), according to their type and maturity, to derive an adjusted price (VPrice<sub>adj</sub>):

$$\text{VPrice}_{\text{adj}} = (1 - \text{liquidity discount} - \text{market impact factor}) * \text{VPrice}$$

- The impact of the liquidity discount should be evaluated for all assets including the following (non-exhaustive list of) eligible assets: Sovereign Bonds, Corporate Bonds, Commercial Papers, Certificates of deposit, ABCPs and eligible securitisations.
- The manager of the MMF should estimate the impact of the potential losses by (a) valuing the remaining investment portfolio at the derived adjusted price, VPrice<sub>adj</sub>, to determine the stressed NAV; (b) valuing assets sold at the derived adjusted price, VPrice<sub>adj</sub>; and (c) calculating the impact as a percentage of the reporting NAV:

---

<sup>14</sup> The discount factor is calibrated on bid-ask spreads.



$$\text{Asset liquidity risk impact (\%)} = \frac{\text{Reporting NAV} - (\text{Stressed NAV} + \text{Assets Sales})}{\text{Reporting NAV}}$$

Notes:

The following assets should be stressed, using the discount factors specified in section 5 of the guidelines:

- Sovereign bonds, with a break down at country level;
- Corporate bonds, including commercial papers issued by financial and non-financial corporates and certificates of deposits, distinguishing at least between investment grade and high yield instruments;
- ~~Commercial Papers~~, ABCPs and eligible securitisations, using the corporate bond parameters.
- Shares issued by other MMFs, using the corporate bond parameters (when there is a difference between financial and non-financial, it shall be the financial corporate bond parameters).
- Other assets (especially repos), using the corporate bond parameters (when there is a difference between financial and non-financial, it shall be the financial corporate bond parameters).

Managers of MMFs should assume redemption requests and simulate the sale of a vertical slice of the fund portfolio whereby the same percentage of each asset is sold to meet redemptions. Asset sales would impact asset prices. According to the price impact parameter specified in section 5 of the guidelines:

- For example, if a fund meets a redemption shock of 30%, it is expected to sell for 30% of each asset (for the sake of consistency this is to be understood in a strict sense and manager should simulate the sale of 30% of each security, or nearest)
- If the funds hold EUR 500mn of commercial papers issued by banks, it is expected to sell for EUR 150mn of them (=30%\*500,000,000)
- If the corresponding price impact factor is 8E-13, the resulting price impact for this asset is 0.01% (=8E-13\*150,000,000)

The calibration is available in section 5 of the Guidelines.



#### 4.8.2 Level of change of credit risk

With respect to the levels of change of credit risk of the assets held in the portfolio of the MMF, including credit events and rating events, in accordance with Article 28(1)(b) of the MMF Regulation:

1) Credit spread stress test

Managers of MMFs should measure the impact of an increase in credit spread, according to the following specifications:

- For each security, the increase in spread specified in section 5 of the guidelines should be applied.
- For each security, the corresponding change in spread should be translated into a haircut.
- The impact of the cumulated haircuts in percentage of reporting NAV should be calculated.

$$\text{Credit risk impact (\%)} = \frac{\text{Reporting NAV} - \text{Stressed NAV}}{\text{Reporting NAV}}$$

2) Concentration stress test

Managers of MMFs should also simulate the default of their two main exposures. The resulting impact on NAV should then be calculated, expressed as a percentage:

$$\text{Concentration risk impact (\%)} = \frac{\text{Reporting NAV} - \text{Stressed NAV}}{\text{Reporting NAV}}$$

Notes:

The concentration risk scenario depends on the characteristics of the exposure. The collateral (or any other mitigant, e.g. credit derivatives) received should be considered. If there is no collateral, or if the collateral is insufficient to cover the exposure, the following loss given default should apply:

- Senior exposures: 45 %;
- Subordinated exposures: 75 %.

The calibration is available in section 5 of the Guidelines.

#### **4.8.3 Levels of change of the interest rates and exchange rates and levels of widening or narrowing of spreads among indices to which interest rates of portfolio securities are tied**

With respect to the levels of change of the interest rates and exchange rates referred to in Article 28(1)(c) of the MMF Regulation, managers of MMFs should apply the following stressed market parameters using the parameters specified in section 5 of the guidelines in respect of (a) interest rate yield shocks which correspond to movements of the interest rates; and (b) FX shocks which corresponds to movements of the exchange rates.

##### 1) Levels of change of the interest rates

With respect to the levels of change of the interest rates, managers of MMFs should use the same reference rate curve for all instruments denominated in a given currency and the reference rate tenor should align with the residual maturity of the instrument. For floating rate instruments, instruments may be contractually linked to a particular reference rate, in which case this rate is considered moving in parallel with the reference rate curve. If the table does not provide the tenor corresponding to the residual maturity of the instrument, managers of MMFs should use the most appropriate parameter in the table (e.g. the closest).

##### 2) Levels of change of the exchange rates

With respect to the levels of change of the exchange rates, two scenarios should be used in the calculations: appreciation of the EUR against the USD; depreciation of the EUR against the USD.

##### 3) Levels of widening or narrowing of spreads among indices to which interest rates of portfolio securities are tied

With respect to the levels of widening or narrowing of spreads among indices to which interest rates of portfolio securities are tied referred to in Article 28(1)(e) of the MMF Regulation, managers of MMFs should apply stressed market parameters, according to the following specifications:

- Managers of MMFs should use the parameters specified in section 5 of the guidelines.
- For instruments not tied to a specific index, managers of MMFs shall use the reference rate curve provided for the change of the interest rates scenario.
- If the table does not provide the tenor corresponding to the residual maturity of the instrument, managers of MMFs should use the most appropriate parameter in the table (e.g. the closest).

#### 4) Results

Managers of MMFs should reevaluate their portfolio considering the new parameters separately: interest rates, exchange rates, benchmark rates. They should express the impact of each risk factor as a percentage of NAV by calculating the following:

$$\text{Risk factor impact (\%)} = \frac{\text{Reporting NAV} - \text{Stressed NAV}}{\text{Reporting NAV}}$$

Notes:

The calibration is available in section 5 of the Guidelines.

#### 4.8.4 Levels of redemption

With respect to the levels of redemption referred to in Article 28(1)(d) of the MMF Regulation, managers of MMFs should apply the following stressed redemption scenarios: a reverse liquidity stress test, a weekly liquidity stress test and a concentration stress test.

##### 1) Reverse liquidity stress test

The reverse liquidity stress test comprises the following steps:

- For each asset, managers of MMFs should measure the weekly tradable amount (including maturing assets).
- Managers of MMFs should measure the maximum weekly tradable amount that can be liquidated with the portfolio allocation still being in line with all regulatory requirements of the MMF without distorting the portfolio allocation.

$$\text{Result (\%)} = \frac{\text{Maximum weekly tradable amount that can be liquidated without distorting the portfolio allocation}}{\text{NAV}}$$

Notes:

- For each asset, the weekly tradable amount shall be based on the manager's assessment of the fund's portfolio that is capable of being liquidated within one

week. Such assignment should be based on the shortest period during which such a position could reasonably be liquidated at or near its carrying value<sup>15</sup>.

- The maximum size of outflows the fund can face in one week without distorting the portfolio allocation is determined by (1) the sum of the weekly tradable amounts; and (2) the fund's capacity to comply with the regulatory requirements.
- For these purposes, the regulatory requirements are not limited to but should include at least:
  - Diversification (Article 17 of the MMF Regulation);
  - Concentration (Article 18 of the MMF Regulation);
  - Portfolio rules for short-term MMFs (Article 24 of the MMF Regulation) and for standard MMFs (Article 25 of the MMF Regulation), in particular, Maximum weighted average maturity (WAM); Maximum weighted average life (WAL), daily maturing assets; and weekly maturing assets.
- For example, if 50% of a LVNAV MMF assets are tradable within a week but its WAM becomes higher than 60 days after selling 30%, the manager should report 30%.

The calibration is available in section 5 of the Guidelines.

## 2) Weekly liquidity stress test:

The weekly liquidity stress test assesses the fund's capacity to meet outflows with available weekly liquid assets, considered as the sum of highly liquid assets and weekly maturing assets and comprises the following steps:

- managers of MMFs should apply a stressed redemption scenario where the fund receives net weekly redemption requests from 40% of the professional investors and 30% of the retail investors.
- managers of MMFs should measure available weekly liquid assets to meet the redemption requests according to the following table:

<b>Assets</b>	<b>Article</b>	<b>CQS</b>
Assets referred to in Article 17(7) <sup>16</sup> of the MMF Regulation which are highly liquid and can be redeemed and settled within one working day and have a residual maturity of up to 190 days.	<b>17(7)</b>	<b>1</b>

<sup>15</sup> For its definition, [see the Guidelines on reporting obligations under Articles 3\(3\)\(d\) and 24\(1\), \(2\) and \(4\) of the AIFMD](#)

<sup>16</sup> Money market instruments issued or guaranteed separately or jointly by the Union, the national, regional and local administrations of the Member States or their central banks, the European Central Bank, the European Investment Bank, the European Investment Fund, the European Stability Mechanism, the European Financial Stability Facility, a central authority or

Cash which is able to be withdrawn by giving prior notice of five working days <u>without penalty</u> .	24(1) 25(1)	
Weekly maturing assets	24(1) 25(1)	
Reverse repurchase agreements which are able to be terminated by giving prior notice of five working days	24(1) 25(1)	
<b>x100% = Weekly liquid assets (bucket 1)</b>		
Assets referred to in Article 17(7) of the MMF Regulation which can be redeemed and settled within one working week.	17(7)	1,2
Money market instruments or units or shares of other MMFs which they are able to be redeemed and settled within five working days.	24(1) 25(1)	1,2
Eligible securitisations and asset-backed commercial paper (ABCPs).	9(1)(b)	1
<b>x85% = Weekly liquid assets (bucket 2)</b>		

- Managers of MMFs should calculate the coverage of outflows by weekly liquid assets as a percentage in the following way:

$$\text{Result (\%)} = \frac{\text{Weekly liquid assets}}{\text{Weekly outflows}}$$

**Notes:**

- Weekly liquid assets are classified in two buckets (bucket 1 and 2) according to their category and credit quality. CQS refers to “Credit Quality Steps”, within the meaning of the COMMISSION IMPLEMENTING REGULATION (EU) 2016/1799<sup>17</sup>.
- The sum of the weighted weekly liquid assets will be expressed in percentage of the redemption shock. For example, if a fund meets a redemption shock of 30% with 20% of bucket 1 liquid assets and 45% of total weekly liquid assets (buckets 1 and 2), the manager should report the ratio (Weekly liquid assets)/(Weekly outflows) as a result:
  - 20%/30% = 67% (bucket 1); and
  - 45%/30% = 150% (bucket 1 and 2).

central bank of a third country, the International Monetary Fund, the International Bank for Reconstruction and Development, the Council of Europe Development Bank, the European Bank for Reconstruction and Development, the Bank for International Settlements, or any other relevant international financial institution or organisation to which one or more Member States belong.

<sup>17</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2016%3A275%3ATOC&uri=uriserv%3AOJ.L\\_.2016.275.01.0003.01.ENG](https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2016%3A275%3ATOC&uri=uriserv%3AOJ.L_.2016.275.01.0003.01.ENG)

- It is important to note that the liquidity of any assets should always be checked in an appropriate manner. If there is any doubt regarding the liquidity of a security, managers of MMFs should not include it in the weekly liquid assets.

The calibration is available in section 5 of the Guidelines.

### 3) Concentration stress test

The concentration stress test is a scenario where the MMF faces redemption requests from its two main investors. The impact of the stress test should be assessed according to weekly liquidity stress test methodology.

$$\text{Result (\%)} = \frac{\text{Weekly liquid assets}}{\text{Invested amount of the two main investors}}$$

Note:

The calibration is available in section 5 of the Guidelines.

## 4.8.5 Macro-systemic shocks affecting the economy as a whole

With respect to the identification of macro-systemic shocks affecting the economy as a whole referred to in Article 28(1)(f) of the MMF Regulation, managers of MMFs should take the following steps:

- measure the impact of a market shock combining different risk parameters in accordance with the table below;
- assess the impact of a redemption shock following the market shock. Assets sold in response to the redemption shock will result in additional losses, as defined in the liquidity stress test;
- calculate the result as a percentage of NAV;
- calculate the value of weekly liquid assets after market shock as a percentage of outflows.

	Risk factors	Parameters used for the calibration
<b>Market shock</b>	- FX Rate	- EUR/USD etc.
	- Interest Rate	- Swap rate
	- Credit	- Gov. bond yields/ spreads

	- Spread among indices to which interest rates of portfolio securities are tied	- Corp. bond yields/ spreads
<b>Redemption shock</b>	- Level of Redemption - Asset liquidity	- % outflows - Bid/ask spread (discount factor)
<b>Results</b>	- % NAV - Weekly liquid assets/outflows	
<b>Memo</b>	- % outflows	

Notes:

The scenario envisages the following circumstances:

- The MMF is affected by a shock combining an adverse FX shock and an increase in interest rates including swap rate, government bond yields and corporate bond yields. The credit risk is included in the yield shock. Managers of MMFs should use their internal models to measure the combined impact. The calibration of the shock is based on a macro scenario provided by ESMA and the ESRB and combining shocks from the other scenarios.
- In the wake of the market shock, investors ask for redemption. Outflows are calculated similarly to the redemption scenario by differentiating professional and retail investors, i.e. **the calibration available in table 14 of section 5.**
- To meet the redemption requests, the fund sells assets in a stressed environment characterized by a widening of bid-ask spread as characterized in the liquidity stress test. For the purposes of the stress test, the loss is entirely borne by remaining investors (and not by redeeming investors).
- The impact on the NAV is the result of the market shock, the outflows and the liquidity shock.
- The impact on liquidity is calculated using the weekly liquidity stress test methodology.

The calibration is available in section 5 of the Guidelines.





## 5 Calibration

The following section includes the 2023 calibration for the MMF stress tests the results of which have to be reported in accordance with Article 37 of the MMF Regulation, and which are detailed in section 4.8 above.

If managers need a parameter that is not indicated in this section, they may consult the adverse scenario on the ESRB website<sup>18</sup>.

---

<sup>18</sup> [Stress testing \(europa.eu\)](#)

## 5.1 Common reference parameters of the stress test scenarios in relation to hypothetical changes in the level of liquidity of the assets held in the portfolio of the MMF

### Scope of the scenario

MMFR Eligible assets	Typical assets	Liquidity	
		Stressed	Parameters
(a) money market instruments	-Certificate of deposit (CD)	Yes	Table 3, 4
	-Commercial Paper (CP)	Yes	Table 3, 4
	-Government bonds, treasury and local authority bills	Yes	Table 1,2, 4
	-Corporate bonds	Yes	Table 3, 4
(b) eligible securitisations and asset-backed commercial paper (ABCPs)	-Eligible securitisations	Yes	Table 3, 4
	-ABCPs	Yes	Table 3, 4
(c) deposits with credit institutions	-Deposits, of which time deposits	No	
(d) financial derivative instruments	-Financial derivative instruments dealt in on a regulated market	No	
	-Financial derivative instruments dealt OTC	No	
(e) repurchase agreements	-Repos	Yes	4
(f) reverse repurchase agreements	-Reverse repos	Yes	4
(g) units or shares of other MMFs	-Shares issued by other MMFs	Yes	Extrapolation of the results to shares issued by other MMFs

**Table 1**

Liquidity discount factor - Sovereign bonds by residual maturity - Reference countries (in %)					
	3M	6M	1Y	1.5Y	2Y
DE	0.18	0.26	0.65	<u>0.76</u>	0.87
ES	0.22	0.42	0.99	<u>1.11</u>	1.23
FR	0.19	0.39	0.90	<u>1.01</u>	1.11
IT	0.19	0.36	0.80	<u>0.93</u>	1.07
NL	0.20	0.40	0.95	<u>1.05</u>	1.16

**Table 2**

Liquidity discount factor - Sovereign bonds by rating and residual maturity (in %)					
	3M	6M	1Y	1.5Y	2Y
AAA	<u>0.19</u>	<u>0.33</u>	<u>0.80</u>	<u>0.91</u>	<u>1.02</u>
AA	<u>0.19</u>	<u>0.39</u>	<u>0.90</u>	<u>1.01</u>	<u>1.11</u>
A	<u>0.22</u>	<u>0.42</u>	<u>0.99</u>	<u>1.11</u>	<u>1.23</u>
BBB	<u>0.22</u>	<u>0.42</u>	<u>0.99</u>	<u>1.11</u>	<u>1.23</u>
Below BBB or unrated	<u>0.28</u>	<u>0.55</u>	<u>1.28</u>	<u>1.44</u>	<u>1.60</u>

**Table 3**

Liquidity discount factor - Corporate bonds by rating and residual maturity		
	≤1Y	>1Y
AAA	<u>1.16</u>	<u>1.28</u>
AA	<u>1.16</u>	<u>1.35</u>
A	<u>1.20</u>	<u>1.42</u>
BBB	<u>1.24</u>	<u>1.42</u>
Below BBB or unrated	<u>1.62</u>	<u>1.85</u>

**Table Option 4: Price impact parameter**

<b>Price impact parameter (%)</b>	
Cash and deposits	-
Sovereign bonds	1E-13
Corporate bonds (non-financial)	4.3E-13
Corporate bonds (financial)	8E-13
Securitisation and ABCPs	4E-13
Shares issued by other MMFs	2.7E-13
Other (incl. repos)	4.7E-13

## 5.2 Common reference parameters of the stress test scenarios in relation to hypothetical changes in the level of credit risk of the assets held in the portfolio of the MMF, including credit events and rating events

### Scope of the scenario

MMFR Eligible assets	Typical assets	Credit (credit spreads)		Credit (2 main counterparties)	
		Stressed	Parameters	Stressed	Parameters
(a) money market instruments	-Certificate of deposit (CD)	Yes	Table 6	Yes	Table 7
	-Commercial Paper (CP)	Yes	Table 6	Yes	Table 7
	-Government bonds, treasury and local authority bills	Yes	Table 5	Yes	Table 7
	-Corporate bonds	Yes	Table 6	Yes	Table 7
(b) eligible securitisations and asset-backed commercial paper (ABCPs)	-Eligible securitisations	Yes	Table 6	Yes	Table 7
	-ABCPs	Yes	Table 6	Yes	Table 7
(c) deposits with credit institutions	-Deposits, of which time deposits	No		No	
(d) financial derivative instruments	-Financial derivative instruments dealt in on a regulated market	No		No	
	-Financial derivative instruments dealt OTC	No		No	
(e) repurchase agreements	-Repos	No		No	
(f) reverse repurchase agreements	-Reverse repos	No		No	
(g) units or shares of other MMFs	-Shares issued by other MMFs	Yes	Extrapolation of the results to shares issued by other MMFs	Yes	Extrapolation of the results to shares issued by other MMFs

**Table 5: Shocks to government bond credit spreads**

Credit Spread by residual maturity - Government bonds (absolute changes - basis points)					
Geographic Area	Country	3M	6M	1Y	2Y
EU	Austria	36	48	58	61
EU	Belgium	37	48	55	61
EU	Bulgaria	54	56	72	78
EU	Croatia	46	59	68	74
EU	Cyprus	72	89	104	110
EU	Czech Republic	71	87	103	109
EU	Denmark	22	33	46	57
EU	Finland	38	49	56	62
EU	France	17	26	39	40
EU	Germany	12	23	30	32
EU	Greece	72	89	104	110
EU	Hungary	13	22	39	40
EU	Ireland	23	37	44	51
EU	Italy	55	66	78	82
EU	Latvia	50	64	73	80
EU	Lithuania	47	60	69	76
EU	Luxembourg	17	29	35	39
EU	Malta	38	53	57	62
EU	Netherlands	14	25	31	35
EU	Poland	58	68	80	86
EU	Portugal	62	74	87	100
EU	Romania	35	43	58	67
EU	Slovakia	49	63	72	79
EU	Slovenia	16	27	34	37
EU	Spain	52	63	71	78
EU	Sweden	13	22	31	41
EA (weighted averages)	<b>EA (weighted averages)</b>	29	39	49	52
EU (weighted averages)	<b>EU (weighted averages)</b>	30	41	50	55
Advanced economies	<b>United Kingdom</b>	14	25	36	43
Advanced economies	<b>Switzerland</b>	30	31	33	35
Advanced economies	<b>Norway</b>	14	26	34	45
Advanced economies	<b>United States</b>	16	23	31	40
Advanced economies	<b>Japan</b>	35	35	45	45
Advanced economies	<b>Advanced economies non EU and non US</b>	23	29	37	42
Emerging markets		<b>95</b>	<b>117</b>	<b>136</b>	<b>214</b>

**Table 6: Shocks to corporate bond and ABS credit spreads (all maturities)**

Rating	Corporate credit spreads (absolute changes - basis points)			
	Non-financial	Financial covered	Financial	ABS
AAA	121	92	129	137
AA	124	106	149	144
A	147	120	162	190
BBB	210	196	253	261
BB	273	247	313	<u>329</u>
B	329	297	372	<u>329</u>
≤CCC	397	366	453	<u>329</u>

**Table 7: Loss given default**

Loss given default (%)	
Senior exposure	45
Subordinated exposure	75

### 5.3 Common reference parameters of the stress test scenarios in relation to hypothetical movements of the interest rates

#### Scope of the scenario

MMFR Eligible assets	Typical assets	IR (Interest rate swap)	
		Stressed	Parameters
(a) money market instruments	-Certificate of deposit (CD)	Yes	Table 8, 9
	-Commercial Paper (CP)	Yes	Table 8, 9
	-Government bonds, treasury and local authority bills -Corporate bonds	Yes Yes	Table 8, 9 Table 8, 9
(b) eligible securitisations and asset-backed commercial paper (ABCPs)	-Eligible securitisations	Yes	Table 8, 9
	-ABCPs	Yes	Table 8, 9
(c) deposits with credit institutions	-Deposits, of which time deposits	Yes	Table 8, 9
(d) financial derivative instruments	-Financial derivative instruments dealt in on a regulated market	Yes	Table 8, 9
	-Financial derivative instruments dealt OTC	Yes	Table 8, 9
(e) repurchase agreements	-Repos	No	
(f) reverse repurchase agreements	-Reverse repos	Yes	Table 8, 9
(g) units or shares of other MMFs	-Shares issued by other MMFs	Yes	Extrapolation of the results to shares issued by other MMFs



**Table 8: Shocks to swap rates**

Interest rate yield shocks absolute changes (basis points)							
Geographic Area	Country	Description	1M	3M	6M	1Y	2Y
EU	<b>Euro area</b>	Interest rate swap on the EUR (euro)	87	99	112	120	130
EU	<b>Bulgaria</b>	Interest rate swap on the BGN (Bulgarian lev)	112	130	148	156	166
EU	<b>Czech Republic</b>	Interest rate swap on the CZK (Czech koruna)	110	112	125	133	144
EU	<b>Denmark</b>	Interest rate swap on the DKK (Danish krone)	91	105	115	124	132
EU	<b>Hungary</b>	Interest rate swap on the HUF (Hungarian forint)	170	182	191	206	222
EU	<b>Poland</b>	Interest rate swap on the PLN (Polish zloty)	101	108	124	133	144
EU	<b>Romania</b>	Interest rate swap on the RON (Romanian leu)	112	130	148	154	161
EU	<b>Sweden</b>	Interest rate swap on the SEK (Swedish krona)	92	105	115	126	135
Rest of Europe	<b>United Kingdom</b>	Interest rate swap on the GBP (British pound)	92	107	121	129	135
Rest of Europe	<b>Norway</b>	Interest rate swap on the NOK (Norwegian krone)	90	104	113	123	133
Rest of Europe	<b>Switzerland</b>	Interest rate swap on the CHF (Swiss franc)	64	83	107	122	136
Rest of Europe	<b>Turkey</b>	Interest rate swap on the TRY (Turkish lira)	195	250	305	322	340

North America	<b>Canada</b>	Interest rate swap on the CAD (Canadian dollar)	98	112	127	137	141
North America	<b>United States</b>	Interest rate swap on the USD (US dollar)	97	111	126	133	139
Australia and Pacific	<b>Australia</b>	Interest rate swap on the AUD (Australian dollar)	99	113	139	142	152
South and Central America	<b>Chile</b>	Interest rate swap on the CLP (Chilean peso)	167	180	193	206	220
South and Central America	<b>Colombia</b>	Interest rate swap on the COP (Colombian peso)	218	224	246	251	256
South and Central America	<b>Mexico</b>	Interest rate swap on the MXN (Mexican peso)	168	171	184	220	235
Asia	<b>China</b>	Interest rate swap on the CNY (Chinese yuan)	98	115	135	154	177
Asia	<b>Hong Kong</b>	Interest rate swap on the HKD (Hong Kong dollar)	108	125	144	157	179
Asia	<b>Japan</b>	Interest rate swap on the JPY (Japanese yen)	8	9	14	19	29
Asia	<b>Malaysia</b>	Interest rate swap on the MYR (Malaysian ringgit)	34	51	83	104	107
Asia	<b>Singapore</b>	Interest rate swap on the SGD (Singapore dollar)	119	130	138	148	148
Africa	<b>South Africa</b>	Interest rate swap on the ZAR (South African rand)	162	166	169	188	210

**Table 9 Shocks to swap rates (default values for countries not included in table 8)**

Interest rate yield shocks absolute changes (basis points)						
Geographic Area	Description	1M	3M	6M	1Y	2Y
EU	Default value for countries not included in table 8	109	121	135	144	154
Other advanced economies	Default value for countries not included in table 8	85	99	115	128	141
Other emerging markets	Default value for countries not included in table 8	140	155	174	196	210

## 5.4 Common reference parameters of the stress test scenarios in relation to hypothetical movements of the exchange rates

### Scope of the scenario

MMFR Eligible assets	Typical assets	FX (Appreciation of the EUR)		FX (Depreciation of the EUR)	
		Stressed	Parameters	Stressed	Parameters
(a) money market instruments	-Certificate of deposit (CD)	Yes	Table 10	Yes	Table 11
	-Commercial Paper (CP)	Yes	Table 10	Yes	Table 11
	-Government bonds, treasury and local authority bills	Yes	Table 10	Yes	Table 11
	-Corporate bonds	Yes	Table 10	Yes	Table 11
(b) eligible securitisations and asset-backed commercial paper (ABCPs)	-Eligible securitisations	Yes	Table 10	Yes	Table 11
	-ABCPs	Yes	Table 10	Yes	Table 11
(c) deposits with credit institutions	-Deposits, of which time deposits	Yes	Table 10	Yes	Table 11
(d) financial derivative instruments	-Financial derivative instruments dealt in on a regulated market	Yes	Table 10	Yes	Table 11
	-Financial derivative instruments dealt OTC	Yes	Table 10	Yes	Table 11
(e) repurchase agreements	-Repos	No		No	
(f) reverse repurchase agreements	-Reverse repos	Yes	Table 10	Yes	Table 11
(g) units or shares of other MMFs	-Shares issued by other MMFs	Yes	Extrapolation of the results to shares issued by other MMFs	Yes	Extrapolation of the results to shares issued by other MMFs

**Table 10**

<b>FX shocks (appreciation of the EUR against the USD)</b>			
<b>relative changes (%)</b>			
<b>Geographic Area</b>	<b>Description</b>	<b>Exchange rate name</b>	<b>Shock</b>
EU	EURCZK represents 1 EUR per x CZK (Czech koruna)	EURCZK	4.80
EU	EURHUF represents 1 EUR per x HUF (Hungarian forints)	EURHUF	10.90
EU	EURPLN represents 1 EUR per x PLN (Polish zloty)	EURPLN	7.52
EU	EURRON represents 1 EUR per x RON (Romanian leu )	EURRON	2.87
EU	EURSEK represents 1 EUR per x SEK (Swedish krona)	EURSEK	9.33
Rest of Europe	EURRSD represents 1 EUR per x RSD (Serbian dinar )	EURRSD	2.10
Rest of Europe	EURNOK represents 1 EUR per x NOK (Norwegian krone)	EURNOK	12.85
Rest of Europe	EURGBP represents 1 EUR per x GBP (British pound)	EURGBP	8.79
Rest of Europe	EURCHF represents 1 EUR per x CHF (Swiss franc)	EURCHF	5.72
Rest of Europe	EURTRY represents 1 EUR per x TRY (Turkish lira)	EURTRY	16.95
North America	USDCAD represents 1 USD per x CAD (Canadian dollar)	USDCAD	-5.92
North America	EURUSD represents 1 EUR per x USD (US dollar)	EURUSD	7.86
Australia and Pacific	AUDUSD represents 1 AUD per x USD (Australian dollar)	AUDUSD	10.59
Australia and Pacific	NZDUSD represents 1 NZD per x USD (New Zealand dollar)	NZDUSD	10.44
South and Central America	USDARS represents 1 USD per x ARS (Argentine peso)	USDARS	9.24

South and Central America	USDBRL represents 1 USD per x BRL (Brazilian real)	USDBRL	-17.62
South and Central America	USDMXN represents 1 USD per x MXN (Mexican peso)	USDMXN	-12.46
Asia	USDCNY represents 1 USD per x CNY (Chinese yuan renminbi)	USDCNY	-3.38
Asia	USDHKD represents 1 USD per x HKD (Hong Kong dollar)	USDHKD	-0.65
Asia	USDINR represents 1 USD per x INR (Indian rupee)	USDINR	-2.99
Asia	USDJPY represents 1 USD per x JPY (Japanese yen)	USDJPY	-8.47
Asia	USDKRW represents 1 USD per x KRW (South Korean won)	USDKRW	-8.11
Asia	USDMYR represents 1 USD per x MYR (Malaysian ringgit)	USDMYR	-3.64
Asia	USDSGD represents 1 USD per x SGD (Singapore dollar)	USDSGD	-4.97
Asia	USDTHB represents 1 USD per x THB (Thai baht)	USDTHB	-7.21
Africa	USDZAR represents 1 USD per x ZAR (South African rand)	USDZAR	-12.16

**Table 11**

FX shocks (depreciation of the EUR against the USD)			
relative changes (%)			
Geographic Area	Description	Exchange rate name	Shock
EU	EURCZK represents 1 EUR per x CZK (Czech koruna)	EURCZK	-6.44
EU	EURHUF represents 1 EUR per x HUF (Hungarian forint)	EURHUF	-13.46
EU	EURPLN represents 1 EUR per x PLN (Polish zloty)	EURPLN	-8.38
EU	EURRON represents 1 EUR per x RON (Romanian leu)	EURRON	-2.70
EU	EURSEK represents 1 EUR per x SEK (Swedish krona)	EURSEK	-5.47
Rest of Europe	EURRSD represents 1 EUR per x RSD (Serbian dinar)	EURRSD	-1.95

Rest of Europe	EURNOK represents 1 EUR per x NOK (Norwegian krone)	EURNOK	-6.77
Rest of Europe	EURGBP represents 1 EUR per x GBP (British pound)	EURGBP	-5.92
Rest of Europe	EURCHF represents 1 EUR per x CHF (Swiss franc)	EURCHF	-8.21
Rest of Europe	EURTRY represents 1 EUR per x TRY (Turkish lira)	EURTRY	-7.74
North America	USDCAD represents 1 USD per x CAD (Canadian dollar)	USDCAD	10.11
North America	EURUSD represents 1 EUR per x USD (US dollar)	EURUSD	-11.34
Australia and Pacific	AUDUSD represents 1 AUD per x USD (Australian dollar)	AUDUSD	-15.68
Australia and Pacific	NZDUSD represents 1 NZD per x USD (New Zealand dollar)	NZDUSD	-14.33
South and Central America	USDARS represents 1 USD per x ARS (Argentine peso)	USDARS	17.90
South and Central America	USDBRL represents 1 USD per x BRL (Brazilian real)	USDBRL	16.00
South and Central America	USDMXN represents 1 USD per x MXN (Mexican peso)	USDMXN	9.14
Asia	USDCNY represents 1 USD per x CNY (Chinese yuan renminbi)	USDCNY	7.38
Asia	USDHKD represents 1 USD per x HKD (Hong Kong dollar)	USDHKD	0.80
Asia	USDINR represents 1 USD per x INR (Indian rupee)	USDINR	6.85
Asia	USDJPY represents 1 USD per x JPY (Japanese yen)	USDJPY	14.25
Asia	USDKRW represents 1 USD per x KRW (South Korean won)	USDKRW	12.95
Asia	USDMYR represents 1 USD per x MYR (Malaysian ringgit)	USDMYR	6.53
Asia	USDSGD represents 1 USD per x SGD (Singapore dollar)	USDSGD	5.55
Asia	USDTHB represents 1 USD per x THB (Thai baht)	USDTHB	8.90
Africa	USDZAR represents 1 USD per x ZAR (South African rand)	USDZAR	18.84

## 5.5 Common reference parameters of the stress test scenarios in relation to hypothetical widening or narrowing of spreads among indexes to which interest rates of portfolio securities are tied

### Scope of the scenario

MMFR Eligible assets	Typical assets	IR (Interest rate swap)	
		Stressed	Parameters
(a) money market instruments	-Certificate of deposit (CD)	Yes	Table 8, 9
	-Commercial Paper (CP)	Yes	Table 8, 9
	-Government bonds, treasury and local authority bills	Yes	Table 8, 9
	-Corporate bonds	Yes	Table 8, 9
(b) eligible securitisations and asset-backed commercial paper (ABCPs)	-Eligible securitisations	Yes	Table 8, 9
	-ABCPs	Yes	Table 8, 9
(c) deposits with credit institutions	-Deposits, of which time deposits	Yes	Table 8, 9
(d) financial derivative instruments	-Financial derivative instruments dealt in on a regulated market	Yes	Table 8, 9
	-Financial derivative instruments dealt OTC	Yes	Table 8, 9
(e) repurchase agreements	-Repos	No	
(f) reverse repurchase agreements	-Reverse repos	Yes	Table 8, 9
(g) units or shares of other MMFs	-Shares issued by other MMFs	Yes	Extrapolation of the results to shares issued by other MMFs



## 5.6 Common reference parameters of the stress test scenarios in relation to hypothetical levels of redemption

### Scope of the scenario

MMFR Eligible assets	Typical assets	Redemption (reverse liquidity ST)		Redemption (weekly liquidity ST)		Redemption (2 main investors)	
		Stressed	Parameters	Stressed	Parameters	Stressed	Parameters
(a) money market instruments	-Certificate of deposit (CD)	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
	-Commercial Paper (CP)	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
	-Government bonds, treasury and local authority bills	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
	-Corporate bonds	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
(b) eligible securitisations and asset-backed commercial paper (ABCPs)	-Eligible securitisations	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
	-ABCPs	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
(c) deposits with credit institutions	-Deposits, of which time deposits	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
(d) financial derivative instruments	-Financial derivative instruments dealt in on a regulated market	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
	-Financial derivative instruments dealt OTC	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
(e) repurchase agreements	-Repos	Yes	Self-assessment	No	Table 12, 13	No	Table 12
(f) reverse repurchase agreements	-Reverse repos	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12
(g) units or shares of other MMFs	-Shares issued by other MMFs	Yes	Self-assessment	Yes	Table 12, 13	Yes	Table 12

**Table 12**

Assets	Article	CQS
Assets referred to in Article 17(7) which are highly liquid and can be redeemed and settled within one working day and have a residual maturity of up to 190 days	17(7)	1
Cash which is able to be withdrawn by giving prior notice of five working days without penalty	24(1) 25(1)	
Weekly maturing assets	24(1) 25(1)	
Reverse repurchase agreements which are able to be terminated by giving prior notice of five working days	24(1) 25(1)	
<b>x100% = Weekly liquid assets (bucket 1)</b>		
Assets referred to in Article 17(7) which can be redeemed and settled within one working week	17(7)	1,2
Money market instruments or units or shares of other MMFs which they are able to be redeemed and settled within five working days	24(1) 25(1)	1,2
Eligible securitisations and asset-backed commercial paper (ABCPs)	9(1)(b)	1
<b>x85% = Weekly liquid assets (bucket 2)</b>		

**Table 13**

Net outflows (%)	
Professional investor	40
Retail investor	30

## 5.7 Common reference parameters of the stress test scenarios in relation to hypothetical macro systemic shocks affecting the economy as a whole

### Scope of the scenario

MMFR Eligible assets	Typical assets	Macro	
		Stressed	Parameters
(a) money market instruments	-Certificate of deposit (CD)	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
	-Commercial Paper (CP)	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
	-Government bonds, treasury and local authority bills	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
	-Corporate bonds	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
(b) eligible securitisations and asset-backed commercial paper (ABCPs)	-Eligible securitisations	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
	-ABCPs	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
(c) deposits with credit institutions	-Deposits, of which time deposits	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
(d) financial derivative instruments	-Financial derivative instruments dealt in on a regulated market	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
	-Financial derivative instruments dealt OTC	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
(e) repurchase agreements	-Repos	No	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
(f) reverse repurchase agreements	-Reverse repos	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14
(g) units or shares of other MMFs	-Shares issued by other MMFs	Yes	Tables 1,2,3,4,5,6,7,8,10,11, 12, 14

**Table 14**

<b>Net outflows (%)</b>	
<b>Professional investor</b>	20
<b>Retail investor</b>	10

## 6 Appendix

A.

Example of stress combining the various factors mentioned in sections 4.2 to 4.7 with investors' redemption requests

A practical example of one possible implementation of the section "Combination of the various factors mentioned in the following sections 4.2 to 4.7 with investors' redemption requests" is given below.

The table below estimates the losses incurred by the MMF in the event of redemptions or market stress (credit or interest rate shocks).

First scenario: credit premium shock of 25 bps

Second scenario: interest rate shock of 25 bps

	Three largest investors (25%) ↓									Very stable investors (15%) ↓
<b>Redemptions</b>	0%	10%	20%	30%	40%	50%	60%	70%	80%	90%
<b>Initial portfolio</b>			2 bps	3 bps	5 bps	6 bps	8 bps	9 bps	11 bps	12 bps
<b>First scenario</b>	7 bps	9 bps	13 bps	18 bps	24 bps	32 bps	45 bps	66 bps	110 bps	236 bps
<b>Second scenario</b>	3 bps	4 bps	6 bps	9 bps	12 bps	16 bps	21 bps	28 bps	38 bps	85 bps
<b>WAL (days)</b>	105	117	131	149	169	192	219	249	290	320

This stress test shows that a redemption by the three largest investors (25% of net assets) would push the weighted average life (WAL) beyond the 120-day regulatory threshold (for a short-term money market fund) and cause the portfolio to lose in the region of 2-3 bps under normal conditions. The same level of cumulative redemptions with a 25 bps rise in credit premium would cause a loss of around 13-18 bps.

B.

Example of redemptions based on an investor behaviour model, in accordance with the breakdown of liabilities by investor category. This implies the simulation of the behaviour of each type of investor and establishes a simulation based on the composition of the liabilities of the MMF.

**Example of investor classification and simulation of their behaviour** (the figures shown are not real): Investor type Record redemptions for this investor type

	Over one day	Over one week	Over one month
Large institutional Group entity (bank, insurance, own account)	25%	75%	100%
Investment fund	20%	65%	100%
Small institutional Private banking network	10%	25%	40%
Retail investor with distributor A	15%	40%	75%
Retail investor with distributor B	5%	10%	20%
	7%	15%	20%

Stressed redemptions for this investor category

Large institutional Group entity (bank, insurance, own account)	75%	0%	(in agreement with the AMC)
Investment fund	65%		
Small institutional Private banking network	25%		
Retail investor with distributor A	40%		
Retail investor with distributor B	10%		
	15%		

In order to build such a simulation of this kind, the manager needs to make assumptions about the behaviour of each investor type, based in part on historical redemptions. In the example

above, the manager has noted that the retail investors who invested through distributor A are historically slower to exit in the event of difficulty, but that they exhibit the same behaviour over one month as retail investors who invested through distributor B. This fictitious example shows a possible classification that the manager may use based on the data available on the liabilities of the MMF and the behaviour of its investors.

C.

Examples of global stress test scenarios that the manager could consider:

- i. the Lehman Brothers' event with the calibration of all relevant factors one month ahead of the failure of this firm;
- ii. A) a scenario including a combination of the 3 following factors: i) a parallel shift in interest rate (x) ii) a shift in credit spreads (y) and iii) a redemption stress (z);
- iii. B) a scenario including a combination of the 3 following factors: i) a parallel shift in interest rate (x) ii) a shift in credit spreads (y) and iii) a redemption stress (z) Variables x, y and z being the worst figures/shifts experienced by the fund, on an independent basis, for the last 12 months.