



## Circular CSSF 25/877

ESMA Guidelines on stress test scenarios under Article 28 of the Money Market Fund Regulation – Update 2024 (ESMA50-43599798-10651)

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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, 1 April 2025

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 into its administrative practice 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 2023 version of the Guidelines (Ref. ESMA50-43599798-9011), introduced by means of Circular CSSF 24/857, 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. ESMA50-43599798-10651), as published on 7 January 2025 (the “2024 Guidelines”), into its administrative practice. All money market funds (MMFs) under the supervision of the CSSF and Luxembourg managers of MMFs shall duly comply with the 2024 Guidelines.

The 2024 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.

On that basis, the 2024 Guidelines, when compared to the 2023 version, notably combine an update of the methodology to assess the impact of the macro-systemic shocks by providing additional

explanation on the reporting components, with the annual update of the common reference parameters for the stress test scenarios.

The 2024 Guidelines notably concern the topics summarised in Section 1 below.

## **1. Summarised presentation of the 2024 Guidelines**

Section 2 of the Final Report (ESMA50-43599798-10651 dated 7 January 2025) on the 2024 Guidelines provides some background on the rationale behind the 2024 update of the Guidelines, which have only been changed in section 4.8, including in particular sub-section 4.8.5 on the macro-systemic shocks, 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 2024.

The shocks have been calibrated to be severe, consistent with an increase in tail risks, in a context of high geopolitical uncertainty stemming from multiple conflicts worldwide. These geopolitical events would amplify trade disruptions and lead to a sharp increase of commodity prices, ultimately leading to inflationary pressures, which in turn would trigger a broad re-appraisal in market expectations of monetary policy, generating a spike in market risk free rates. The resulting tightening of financing conditions, in combination with sluggish economic growth, would drive higher asset price volatility.

The 2024 Guidelines have the following key characteristics:

- The significant disruptions in financial markets would particularly be influencing the spreads of corporate and government bonds. This would be due to the increased strain on corporate debt servicing capabilities and the prevailing post-pandemic elevated levels of government debt, exacerbated by the high interest rate environment foreseen in the adverse scenario. Due to differing macroeconomic and fiscal positions, the upward shifts in sovereign risk premia would be heterogenous across countries.
- The perceived risk on debt securities, combined with highly volatile market conditions, would cause an abrupt slowdown in market activity, as mirrored by a sharp reduction in instruments' market liquidity and a widening of bid-ask spreads. Finally, such market reactions would also lead to an abrupt revaluation of other financial assets and real estate prices, inducing substantial volatility for market participants and causing sharp increases in risk premia.

### New clarifications in relation to the macro-systemic shocks:

ESMA and the NCAs observed that, when reporting the impact of the macro-systemic shocks on the NAV, some managers deducted the outflows from the figure reported, while others only reported the impact on the value of the fund before outflows.

The 2024 Guidelines include clarifications on how to report the impact of the macro-systemic shock on the funds' NAV and the shock on weekly liquidity. This change of the guidelines is not an amendment but a mere clarification of the methodology, and therefore did not trigger the need for further consultation with stakeholders.

Finally, the 2024 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 24/857 implementing the 2023 version of the Guidelines is repealed and replaced by this Circular with effect as of 24 April 2025. This Circular, with the updated Guidelines, enters into force on 24 April 2025.

The CSSF expects all entities falling under the scope of this Circular to apply the 2024 Guidelines for the preparation of the required MMF reporting as from the reporting date 30 June 2025 onwards.

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Annex                      ESMA Guidelines on stress test scenarios under the MMF Regulation (Ref. ESMA50-43599798-10651)

# Final Report

Guidelines on stress test scenarios under the MMF Regulation

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## 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 19 December 2023<sup>1</sup> and their translation on 6 March 2024 (“the 2023 Guidelines” also referred to as ESMA34-49-495<sup>2</sup>).

This 2024 final report includes:

- Additional explanation on the way to report the results of the macro systemic shocks (section 4.8 of the Guidelines)
- Updated guidelines and risk parameters, so that managers of MMFs have the information needed to fill in the reporting template mentioned in article 37 of the MMF Regulation (section 5 of the Guidelines)

### Contents

The annex of this report contains the full text of the updated guidelines and the calibration of the scenarios for 2024 (updates in red).

### Next Steps

The Guidelines in the annex 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 2024 parameters, will apply 2 months after the publication of the 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>3</sup>. Until then, managers should use the parameters set in the 2023 Guidelines and report the results accordingly.



## 2 Background

1. Article 28(7) of the Money Market Funds Regulation (MMFR)<sup>4</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 19 December 2023 and their translation on 6 March 2024 (“the 2023 Guidelines”).
2. 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 2024. Considering that the scenario reflects the assessment of systemic risk by ESMA, the ESRB and the ECB, ESMA has not conducted a public consultation on its calibration.<sup>5</sup>
3. 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.
4. While sections 4.8.5 on macro systemic shocks and 5 on the calibration of the Guidelines have been updated, all the other sections of the 2023 Guidelines continue to apply,

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<sup>1</sup> Final Report on Guidelines on stress test scenarios under the MMF Regulation ([ESMA50-43599798-9011](#))

<sup>2</sup> [Guidelines on stress test scenarios under the MMF Regulation - 2023 update \(europa.eu\)](#)

<sup>3</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).

<sup>4</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>5</sup> The previous calibrations of the stress scenarios were not part of a public consultation either.

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 2024 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.

5. With respect to the 2024 update of section 5 of the Guidelines, the adverse scenario is calibrated to be severe, consistent with an increase in tail risks, in a context of high geopolitical uncertainty stemming from multiple conflicts worldwide. These geopolitical events would amplify trade disruptions and lead to a sharp increase in commodity prices, ultimately leading to inflationary pressures. In turn, the rise of inflation would trigger a broad re-appraisal in market expectations of monetary policy, generating a spike in market risk-free rates.
6. The resulting tightening of financing conditions, in combination with sluggish economic growth, would drive higher asset price volatility. Geopolitical instability and high volatility levels would cause significant disruptions in financial markets, particularly influencing the spreads of corporate and government bonds. This would be due to the increased strain on corporate debt servicing capabilities and the prevailing post-pandemic elevated levels of government debt, exacerbated by the high interest rate environment foreseen in the adverse scenario. Due to differing macroeconomic and fiscal positions, the upward shifts in sovereign risk premia would be heterogenous across countries.
7. The perceived risk on debt securities, combined with highly volatile market conditions, would cause an abrupt slowdown in market activity, as mirrored by a sharp reduction in instruments’ market liquidity and a widening of bid-ask spreads. Finally, such market reactions would also lead to an abrupt revaluation of other financial assets and real estate prices, inducing substantial volatility for market participants and causing sharp increases in risk premia.
8. The rest of the Guidelines are largely unchanged:
  - 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.
  - 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 macro systemic shocks **in red**. While the scenario is unchanged, ESMA and the NCAs observed

data quality issues in the data reported<sup>6</sup>. Especially, when reporting the impact on NAV, some managers withdraw the outflows from the figure reported, while other only report the impact on the value of the fund before outflows. The revised guidelines now include additional explanation on the way to report the results of the shock on the funds' NAV and the shock on weekly liquidity. The change is not an amendment but a mere clarification of the methodology, and therefore did not trigger the need for further consultation with stakeholders.

9. Section 5 of the Guidelines includes updated parameters **in red** which reflect the new scenario. Changes include more granular parameters for the scenarios in relation to hypothetical changes in the level of liquidity of the assets. The increased granularity will allow to distinguish the impact between assets from funds holding assets with a maturity of three months to two years.

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<sup>6</sup> See [ESMA60-1389274163-2560 TRV risk analysis article - MMF stress test](#), ESMA, 2023.

## 3 Annex

### **Guidelines on MMF stress tests (updates in red indicate additional text added, parameter updates or amendments which constitute the 2024 update to the ESMA34-49-115 Guidelines)**

#### 1 Scope

##### Who?

10. These guidelines apply to competent authorities, money market funds and managers of money market funds as defined in the MMF Regulation<sup>7</sup>.

##### What?

11. 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?

12. 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

13. 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:

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<sup>7</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.

14. 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 2024, sections 4.8 and 5 of these guidelines were 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>8</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

15. 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.
16. 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

17. 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.
18. 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.
19. 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

20. 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”.

21. 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.

22. 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.

23. 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

24. 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.
25. 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.
26. 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.
27. 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.
28. 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

29. 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



30. 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

31. 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.

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

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

Stress tests in the case of CNAV and LVNAV MMFs

34. 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

35. 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.

36. 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**

37. 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.

38. 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**

39. 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.

40. 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.

41. 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.
42. 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.
43. 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**

44. 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).
45. 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

46. 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.
47. Stress tests on redemptions should include the specific measures which the MMF has the constitutional power to activate (for instance, gates and redemption notice).
48. 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.
49. 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.
50. 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).
51. 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).
52. 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.

53. 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**

54. 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**

55. 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.

56. 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.

57. 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)**

58. 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

59. 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>9</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>**):

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

- 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:

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<sup>9</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;
- 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

60. 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

61. 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

62. 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**

63. 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**

64. 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**

65. 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**

66. 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**

67. 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

68. 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

69. 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>10</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:

70. 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>11</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.	17(7)	1

<sup>10</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>11</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>12</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

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>12</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)

- 45%/30% = 150% (bucket 1 and 2).

- 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

71. 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

72. 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

	<ul style="list-style-type: none"> <li>- Credit</li> <li>- Spread among indices to which interest rates of portfolio securities are tied</li> </ul>	<ul style="list-style-type: none"> <li>- Gov. bond yields/ spreads</li> <li>- Corp. bond yields/ spreads</li> </ul>
<b>Redemption shock</b>	<ul style="list-style-type: none"> <li>- Level of Redemption</li> <li>- Asset liquidity</li> </ul>	<ul style="list-style-type: none"> <li>- % outflows</li> <li>- Bid/ask spread (discount factor)</li> </ul>
<b>Results</b>	<ul style="list-style-type: none"> <li>- % NAV</li> <li>- Weekly liquid assets/ outflows</li> </ul>	
<b>Memo</b>	<ul style="list-style-type: none"> <li>- % outflows</li> </ul>	

73. The impact of the macro stress test should be assessed taking into account the market shock and the liquidity impact from outflows. The reported impact should not include the outflows.

$$\text{Macro stress test impact (\%)} = \frac{\text{Reporting NAV} - \text{Market shock} - \text{liquidity impact from outflows}}{\text{Reporting NAV}}$$

74. The impact of the redemption shock should be assessed according to weekly liquidity stress test methodology.

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

**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

75. The following section includes the 2024 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.

76. ESMA has worked in collaboration with the ESRB and the ECB for the annual calibration of the risk parameters. Most of the parameters have been updated from the new ESRB adverse scenario. In addition, some parameters were added by ESMA in section 5 and are underlined. If managers need a parameter that is not indicated in this section, they may consult the adverse scenario on the ESRB website<sup>13</sup>.

77. Finally, in case of inconsistency between the Guidelines and the ESRB scenario, managers should use the values provided in the Guidelines.

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<sup>13</sup> [Stress testing \(europa.eu\)](https://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
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**Table 1**

Liquidity discount factor - Sovereign bonds by residual maturity - Reference countries (in %)					
	3M	6M	1Y	1.5Y	2Y
DE	0.19	0.23	0.27	<u>0.37</u>	0.47
ES	0.23	0.40	0.44	<u>0.53</u>	0.61
FR	0.21	0.27	0.28	<u>0.38</u>	0.48
IT	0.20	0.30	0.32	<u>0.42</u>	0.51
NL	0.21	0.34	0.33	<u>0.41</u>	0.48

**Table 2**

Liquidity discount factor - Sovereign bonds by rating and residual maturity (in %)					
	3M	6M	1Y	1.5Y	2Y
AAA	<u>0.20</u>	<u>0.28</u>	<u>0.30</u>	<u>0.39</u>	<u>0.48</u>
AA	<u>0.21</u>	<u>0.27</u>	<u>0.28</u>	<u>0.38</u>	<u>0.48</u>
A	<u>0.23</u>	<u>0.40</u>	<u>0.44</u>	<u>0.53</u>	<u>0.61</u>
BBB	<u>0.23</u>	<u>0.40</u>	<u>0.44</u>	<u>0.53</u>	<u>0.61</u>
Below BBB or unrated	<u>0.30</u>	<u>0.53</u>	<u>0.57</u>	<u>0.68</u>	<u>0.79</u>

**Table 3**

Liquidity discount factor - Corporate bonds by rating and residual maturity					
	3M	6M	1Y	1.5Y	2Y
AAA	<u>0.62</u>	<u>0.92</u>	<u>1.16</u>	<u>1.25</u>	<u>1.34</u>

<b>AA</b>	<u>0.62</u>	<u>0.92</u>	<u>1.16</u>	<u>1.26</u>	<u>1.36</u>
<b>A</b>	<u>0.63</u>	<u>0.93</u>	<u>1.18</u>	<u>1.26</u>	<u>1.36</u>
<b>BBB</b>	<u>0.64</u>	<u>0.94</u>	<u>1.21</u>	<u>1.28</u>	<u>1.36</u>
<b>Below BBB or unrated</b>	<u>0.83</u>	<u>1.22</u>	<u>1.58</u>	<u>1.67</u>	<u>1.76</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	Yes	Extrapolation of the results to shares

			issued by other MMFs	issued by other MMFs
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**Table 5: Shocks to government bond credit spreads**

<b>Credit Spread by residual maturity - Government bonds (absolute changes - basis points)</b>					
<b>Geographic Area</b>	<b>Country</b>	<b>3M</b>	<b>6M</b>	<b>1Y</b>	<b>2Y</b>
EU	<b>Austria</b>	35	45	55	60
EU	<b>Belgium</b>	30	40	55	60
EU	<b>Bulgaria</b>	50	60	75	95
EU	<b>Croatia</b>	40	50	65	70
EU	<b>Cyprus</b>	40	50	65	70
EU	<b>Czech Republic</b>	55	70	95	105
EU	<b>Denmark</b>	15	35	45	50
EU	<b>Finland</b>	30	40	50	60
EU	<b>France</b>	15	30	40	45
EU	<b>Germany</b>	10	20	30	35
EU	<b>Greece</b>	60	80	95	110
EU	<b>Hungary</b>	55	80	95	115
EU	<b>Ireland</b>	25	35	50	55
EU	<b>Italy</b>	55	70	85	105
EU	<b>Latvia</b>	45	60	75	85
EU	<b>Lithuania</b>	45	55	70	85
EU	<b>Luxembourg</b>	15	25	35	50
EU	<b>Malta</b>	45	50	50	85
EU	<b>Netherlands</b>	15	25	35	40
EU	<b>Poland</b>	45	60	70	85
EU	<b>Portugal</b>	35	45	55	65
EU	<b>Romania</b>	40	55	65	80
EU	<b>Slovakia</b>	40	45	70	75
EU	<b>Slovenia</b>	30	35	50	55
EU	<b>Spain</b>	50	60	70	75
EU	<b>Sweden</b>	15	25	35	40
EA (weighted averages)	<b>EA (weighted averages)</b>	25	35	50	60
EU (weighted averages)	<b>EU (weighted averages)</b>	30	40	50	60
Advanced economies	<b>United Kingdom</b>	15	30	40	45
Advanced economies	<b>Switzerland</b>	25	35	40	40
Advanced economies	<b>Norway</b>	15	30	35	45
Advanced economies	<b>United States</b>	15	25	30	40
Advanced economies	<b>Japan</b>	30	30	35	40
Advanced economies	<b>Advanced economies non EU and non US</b>	20	30	35	40
Emerging markets		85	110	145	200

**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	110	90	120	110
AA	120	110	130	140
A	150	140	160	200
BBB	190	180	220	240
BB	270	260	300	<u>336</u>
B	340	310	350	<u>336</u>
≤CCC	380	360	410	<u>336</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	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

**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)	90	90	120	130	140
EU	<b>Bulgaria</b>	Interest rate swap on the BGN (Bulgarian lev)	120	140	160	170	180
EU	<b>Czech Republic</b>	Interest rate swap on the CZK (Czech koruna)	100	110	120	150	180
EU	<b>Denmark</b>	Interest rate swap on the DKK (Danish krone)	90	100	120	130	140
EU	<b>Hungary</b>	Interest rate swap on the HUF (Hungarian forint)	110	120	140	160	180
EU	<b>Poland</b>	Interest rate swap on the PLN (Polish zloty)	110	110	140	160	180
EU	<b>Romania</b>	Interest rate swap on the RON (Romanian leu)	120	140	160	170	180
EU	<b>Sweden</b>	Interest rate swap on the SEK (Swedish krona)	90	90	120	130	140



Rest of Europe	<b>United Kingdom</b>	Interest rate swap on the GBP (British pound)	100	100	120	130	140
Rest of Europe	<b>Norway</b>	Interest rate swap on the NOK (Norwegian krone)	100	100	120	130	140
Rest of Europe	<b>Russia</b>	Interest rate swap on the RUB (Russian ruble)	210	210	220	220	260
Rest of Europe	<b>Switzerland</b>	Interest rate swap on the CHF (Swiss franc)	80	90	110	130	140
Rest of Europe	<b>Turkey</b>	Interest rate swap on the TRY (Turkish lira)	230	270	310	340	380
North America	<b>Canada</b>	Interest rate swap on the CAD (Canadian dollar)	100	110	130	140	150
North America	<b>United States</b>	Interest rate swap on the USD (US dollar)	100	110	130	140	150
Australia and Pacific	<b>Australia</b>	Interest rate swap on the AUD (Australian dollar)	100	130	130	150	160
Australia and Pacific	<b>New Zealand</b>	Interest rate swap on the NZD (New Zealand dollar)	100	130	140	150	160
South and Central America	<b>Chile</b>	Interest rate swap on the CLP (Chilean peso)	170	190	220	240	280
South and Central America	<b>Colombia</b>	Interest rate swap on the COP (Colombian peso)	230	250	250	260	270
South and Central America	<b>Mexico</b>	Interest rate swap on the MXN (Mexican peso)	160	180	200	220	250
Asia	<b>China</b>	Interest rate swap on the CNY (Chinese yuan)	100	120	140	170	190
Asia	<b>Hong Kong</b>	Interest rate swap on the HKD (Hong Kong dollar)	110	130	150	170	190
Asia	<b>India</b>	Interest rate swap on the INR (Indian rupee)	120	140	160	180	200
Asia	<b>Japan</b>	Interest rate swap on the JPY (Japanese yen)	10	10	10	20	30
Asia	<b>Korea</b>	Interest rate swap on the KRW (South Korean won)	100	120	130	170	200

Asia	<b>Malaysia</b>	Interest rate swap on the MYR (Malaysian ringgit)	40	60	80	110	120
Asia	<b>Singapore</b>	Interest rate swap on the SGD (Singapore dollar)	120	130	140	150	160
Asia	<b>Thailand</b>	Interest rate swap on the THB (Thai baht)	50	70	90	120	130
Africa	<b>South Africa</b>	Interest rate swap on the ZAR (South African rand)	150	160	160	190	220

**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	100	110	140	150	170
Other advanced economies	Default value for countries not included in table 8	90	100	120	140	150
Other emerging markets	Default value for countries not included in table 8	150	170	180	200	230

## 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
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**Table 10**

FX shocks (appreciation 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
EU	EURHUF represents 1 EUR per x HUF (Hungarian forints)	EURHUF	16
EU	EURPLN represents 1 EUR per x PLN (Polish zloty)	EURPLN	10
EU	EURRON represents 1 EUR per x RON (Romanian leu )	EURRON	3
EU	EURSEK represents 1 EUR per x SEK (Swedish krona)	EURSEK	11
Rest of Europe	EURRSD represents 1 EUR per x RSD (Serbian dinar )	EURRSD	2
Rest of Europe	EURNOK represents 1 EUR per x NOK (Norwegian krone)	EURNOK	9
Rest of Europe	EURGBP represents 1 EUR per x GBP (British pound)	EURGBP	10
Rest of Europe	EURCHF represents 1 EUR per x CHF (Swiss franc)	EURCHF	6
Rest of Europe	EURRUB represents 1 EUR per x RUB (Russian ruble)	EURRUB	46
Rest of Europe	EURTRY represents 1 EUR per x TRY (Turkish lira)	EURTRY	20
North America	USDCAD represents 1 USD per x CAD (Canadian dollar)	USDCAD	-5

North America	EURUSD represents 1 EUR per x USD (US dollar)	EURUSD	6
Australia and Pacific	AUDUSD represents 1 AUD per x USD (Australian dollar)	AUDUSD	8
Australia and Pacific	NZDUSD represents 1 NZD per x USD (New Zealand dollar)	NZDUSD	7
South and Central America	USDARS represents 1 USD per x ARS (Argentine peso)	USDARS	9
South and Central America	USDBRL represents 1 USD per x BRL (Brazilian real)	USDBRL	-18
South and Central America	USDMXN represents 1 USD per x MXN (Mexican peso)	USDMXN	-8
Asia	USDCNY represents 1 USD per x CNY (Chinese yuan renminbi)	USDCNY	-3
Asia	USDHKD represents 1 USD per x HKD (Hong Kong dollar)	USDHKD	-1
Asia	USDINR represents 1 USD per x INR (Indian rupee)	USDINR	-2
Asia	USDJPY represents 1 USD per x JPY (Japanese yen)	USDJPY	-6
Asia	USDKRW represents 1 USD per x KRW (South korean won)	USDKRW	-9
Asia	USDMYR represents 1 USD per x MYR (Malaysian ringgit)	USDMYR	-4
Asia	USDSGD represents 1 USD per x SGD (Singapore dollar)	USDSGD	-4
Asia	USDTHB represents 1 USD per x THB (Thai baht)	USDTHB	-5
Asia	USDTWD represents 1 USD per x TWD (New Taiwan dollar)	USDTWD	-3
Africa	USDZAR represents 1 USD per x ZAR (South African rand)	USDZAR	-11

**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

EU	EURHUF represents 1 EUR per x HUF (Hungarian forints)	EURHUF	-9
EU	EURPLN represents 1 EUR per x PLN (Polish zloty)	EURPLN	-5
EU	EURRON represents 1 EUR per x RON (Romanian leu )	EURRON	-2
EU	EURSEK represents 1 EUR per x SEK (Swedish krona)	EURSEK	-3
Rest of Europe	EURRSD represents 1 EUR per x RSD (Serbian dinar )	EURRSD	-2
Rest of Europe	EURNOK represents 1 EUR per x NOK (Norwegian krone)	EURNOK	-9
Rest of Europe	EURGBP represents 1 EUR per x GBP (British pound)	EURGBP	-5
Rest of Europe	EURCHF represents 1 EUR per x CHF (Swiss franc)	EURCHF	-10
Rest of Europe	EURRUB represents 1 EUR per x RUB (Russian ruble)	EURRUB	-44
Rest of Europe	EURTRY represents 1 EUR per x TRY (Turkish lira)	EURTRY	-7
North America	USDCAD represents 1 USD per x CAD (Canadian dollar)	USDCAD	10
North America	EURUSD represents 1 EUR per x USD (US dollar)	EURUSD	-12
Australia and Pacific	AUDUSD represents 1 AUD per x USD (Australian dollar)	AUDUSD	-15
Australia and Pacific	NZDUSD represents 1 NZD per x USD (New Zealand dollar)	NZDUSD	-15
South and Central America	USDARS represents 1 USD per x ARS (Argentine peso)	USDARS	18
South and Central America	USDBRL represents 1 USD per x BRL (Brazilian real)	USDBRL	14
South and Central America	USDMXN represents 1 USD per x MXN (Mexican peso)	USDMXN	11
Asia	USDCNY represents 1 USD per x CNY (Chinese yuan renminbi)	USDCNY	7
Asia	USDHKD represents 1 USD per x HKD (Hong Kong dollar)	USDHKD	1
Asia	USDINR represents 1 USD per x INR (Indian rupee)	USDINR	8
Asia	USDJPY represents 1 USD per x JPY (Japanese yen)	USDJPY	16
Asia	USDKRW represents 1 USD per x KRW (South korean won)	USDKRW	12

Asia	USDMYR represents 1 USD per x MYR (Malaysian ringgit)	USDMYR	6
Asia	USDSGD represents 1 USD per x SGD (Singapore dollar)	USDSGD	5
Asia	USDTHB represents 1 USD per x THB (Thai baht)	USDTHB	10
Asia	USDTWD represents 1 USD per x TWD (New Taiwan dollar)	<b>USDTWD</b>	7
Africa	USDZAR represents 1 USD per x ZAR (South African rand)	USDZAR	20

## 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)	

**Table 13**

Net outflows (%)	
<b>Professional investor</b>	40
<b>Retail investor</b>	30

<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>		

## 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	10%	25%	40%
Private banking network	15%	40%	75%
Retail investor with distributor A	5%	10%	20%
Retail investor with distributor B	7%	15%	20%

Stressed redemptions for this investor category

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

Retail investor 10%  
with distributor A  
Retail investor 15%  
with distributor B

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.