

Preliminaries

Communication from the Commission on Packaged Retail Investment Products

Update on Commission work on Packaged Retail Investment Products 16 december 2009

Pre-contractual disclosures

Common elements to <u>allow</u> for <u>comparisons</u> to include the structure of documents, order of sections, use of plain language, and focus on key <u>information about</u> nature of product, its risks, potential performance and costs. the privileged channels to realize an <u>effective</u> <u>transparency</u> both in the offering and in the distribution of non-equity investment products. Such approach, developed and progressively implemented by Consob, is based on <u>three</u> <u>pillars</u>, corresponding to <u>three synthetic</u> <u>indicators</u> defined through the application of

nsob n. 63: A Quantitative Risk pproach to the Transparency of

The regulatory choices Consob has made

over time reflect its view of the prospectus as

Non-Equity Investment Products

specific quantitative methods.

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The three pillars <u>fully define</u> the <u>contents</u> of a <u>product</u> <u>information</u> <u>sheet</u> which should become the core of the prospectus and of the other transparency documentation intended to effectively.

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Preliminaries

FINANCIAL REGULATORY REFORM: A NEW FOUNDATION

Protect consumers and investors from financial abuse.

To rebuild trust in our markets, we need strong and consistent regulation and supervision of consumer financial services and investment markets. \dots

We must promote $\underline{transparency},$ simplicity, fairness, accountability, and access. We propose:

- Stronger regulations to improve the transparency, fairness, and appropriateness of consumer and investor products and services
- A <u>level playing field</u> and higher standards for providers of consumer financial products and services, whether or not they are part of a bank.

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Syllabus

Proposal of the European Commission for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2003/71/EC on the PROSPECTUS (September 2009)

Whereas (10):

Preliminaries

"The <u>summary</u> of the prospectus is a key <u>source</u> of <u>information</u> for retail investors. It should be short, simple and easy for targeted investors to understand. It should focus on the <u>key information</u> that investors need in order to be able to make informed investment decisions. Its content should not be restricted to any predetermined number of words. The format and content of the summary should be determined in a way that ensures <u>comparability</u> with other investment products that are similar to the investment proposal described in the prospectus.".

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Preliminaries



Transparency.

We propose a new proactive approach to disclosure.

[...] all <u>disclosures</u> and other communications with consumers be reasonable: balanced in their presentation of benefits, and <u>clear</u> and conspicuous in their identification of <u>costs</u>, <u>penalties</u>, and <u>risks</u>.

Mandatory disclosure forms should be clear, simple, and concise.

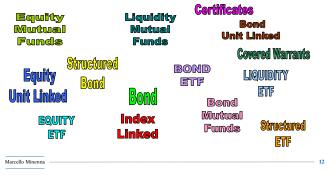
Moreover, reasonableness does not mean a litany of every conceivable risk, which effectively obscures significant risks. It means identifying conspicuously the more <u>significant risks</u>. It means providing consumers with disclosures that help them to understand the consequences of their financial decisions.

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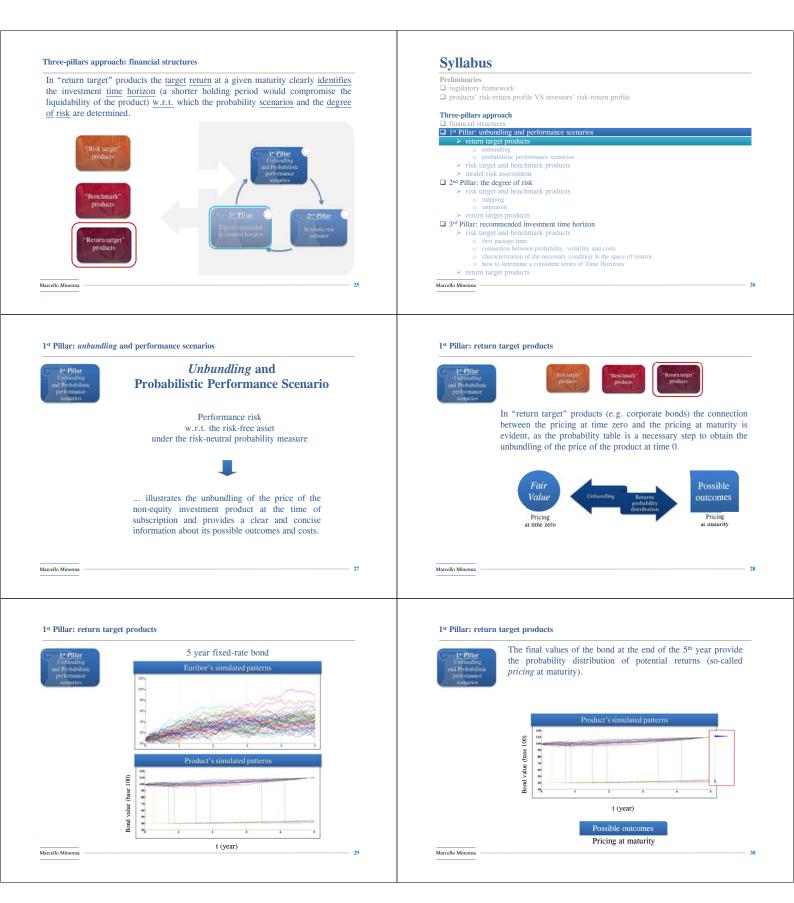
Preliminaries: regulatory framework

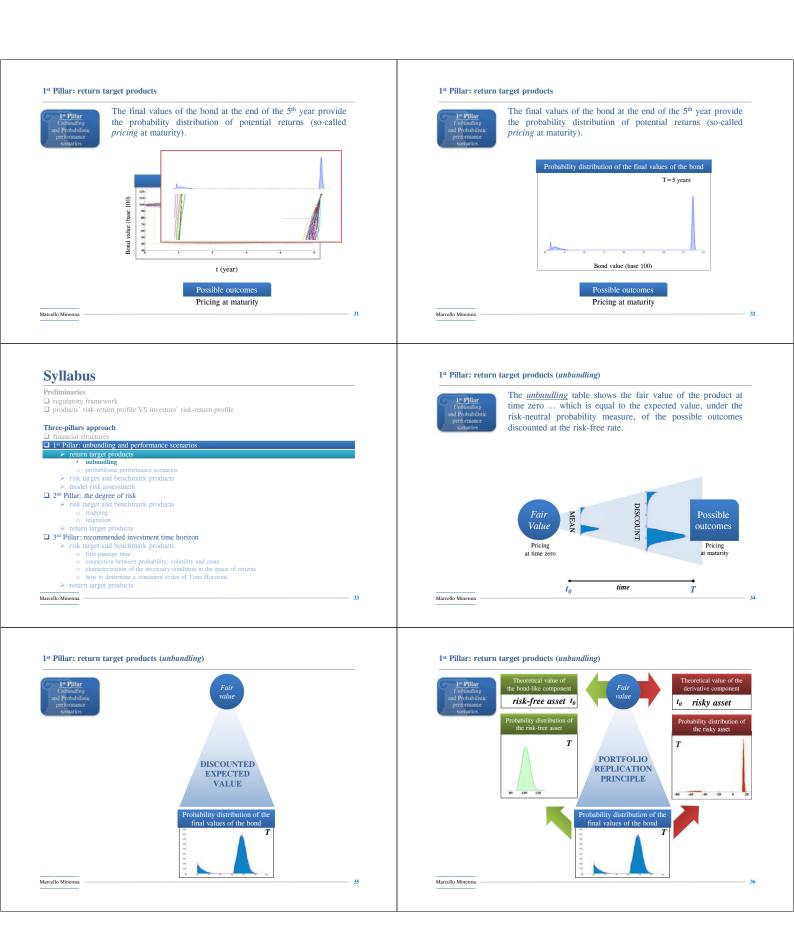
The implementation of the <u>disclosure</u> <u>regulation</u> on the <u>risk-profile</u> of non-equity investment products <u>should allow</u> the <u>investor</u>, even assisted by a financial advisor, to <u>choose</u> the financial <u>product more</u> <u>suitable</u> to his investment objectives.





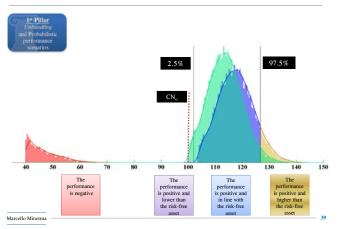






the bond	tical value of like component free asset t_0	Fair value	Theoretical val derivative cor t_0 risky as	nponent
A	Theoretical	value of the bond-lik	e component	
в	Theoretical	value of the derivativ	ve component	
C = A +	B Fair value			
D	Explicit cos	ts		
Е	Implicit cos	ts		
F = C +	D + E Issue price			100

1st Pillar: return target products (probabilistic performance scenarios)



1st Pillar: return target products (unbundling and performance scenarios)



Connection between the pricing at time zero and the pricing at the end of recommended investment horizon





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1:1 Relationship

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Syllabus

Preliminaries regulatory framework products' risk-return profile VS investors' risk-return profile

Three-pillars approach

1st Pillar: unbundling and performance scenarios	
return target products	
o unbundling	
 probabilistic performance scenarios 	
risk target and benchmark products	
model risk assessment	
2 nd Pillar: the degree of risk	
risk target and benchmark products	
o mapping	
o migration	
return target products	
3 rd Pillar: recommended investment time horizon	
risk target and benchmark products	
 first passage time 	
 connection between probability, volatility and costs 	
 characterization of the necessary condition in the space of returns 	
 how to determine a consistent series of Time Horizons 	
return target products	
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1st Pillar: return target products (probabilistic performance scenarios)

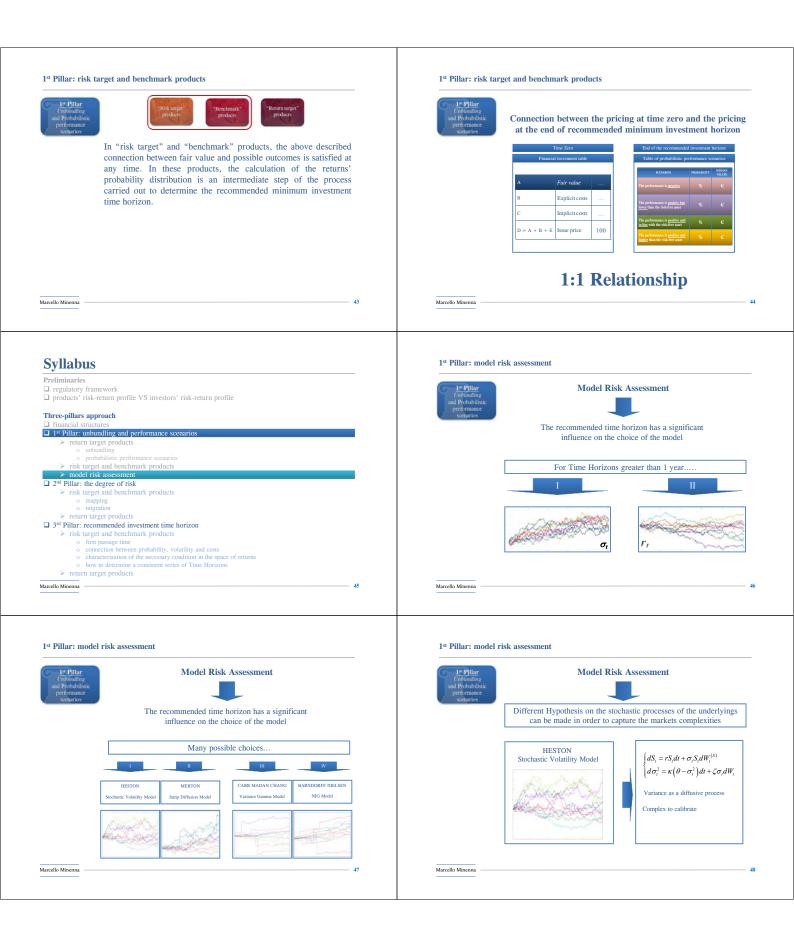
	SCENARIOS	PROBABILITY	MEDIA VALUI
Т	'he performance is <u>negative</u>		
	'he performance is <u>positive but</u> wer than the risk-free asset	%	€
	'he performance is <u>positive and</u> <u>1 line</u> with the risk-free asset	%	€
	he performance is <u>positive and</u> igher than the risk-free asset	%	€

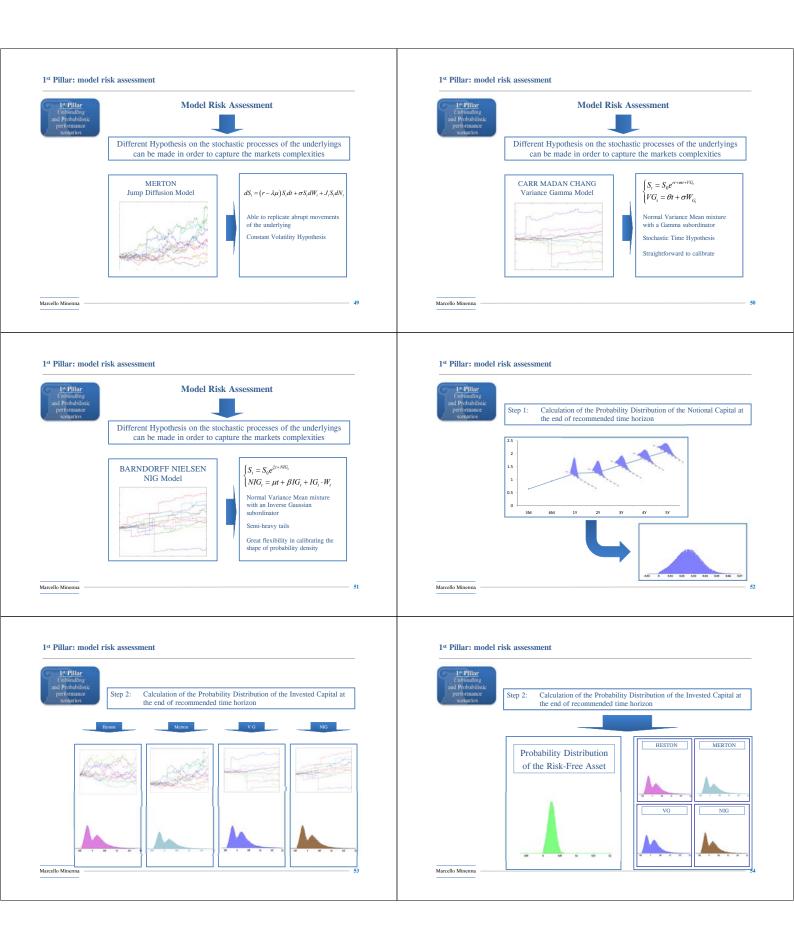
Syllabus

Preliminaries regulatory framework products' risk-return profile VS investors' risk-return profile

Three-pillars approach
financial structures

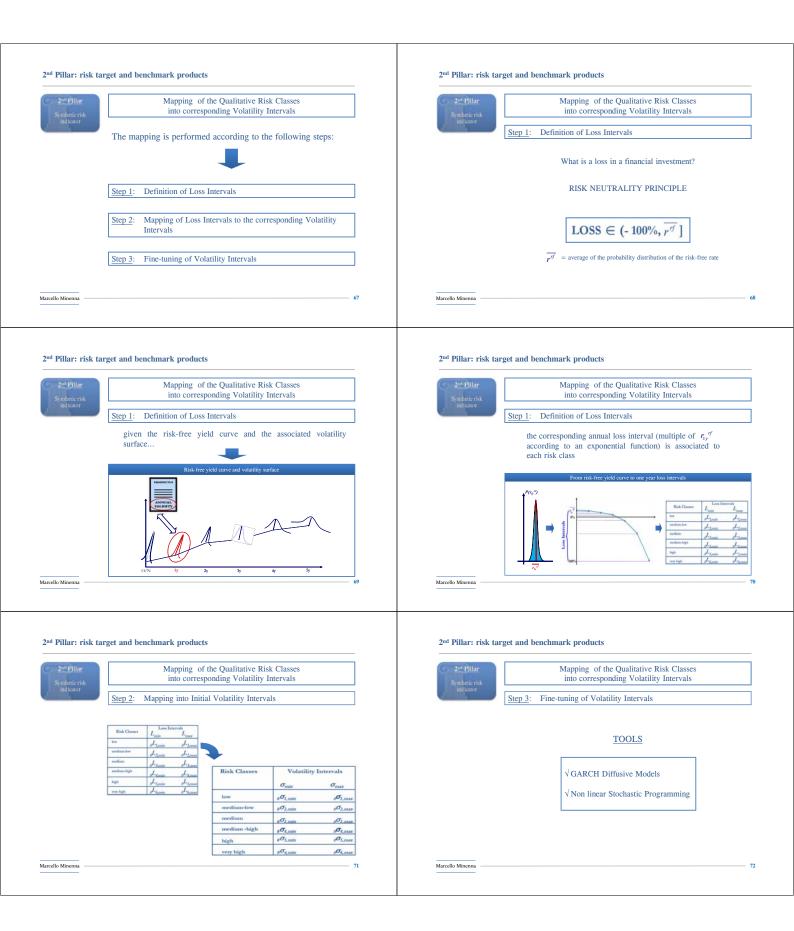
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return target products	
o unbundling	
 probabilistic performance scenarios 	
risk target and benchmark products	
model risk assessment	
□ 2 nd Pillar: the degree of risk	
risk target and benchmark products	
o mapping	
o migration	
return target products	
3 rd Pillar: recommended investment time horizon	
risk target and benchmark products	
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return target products	
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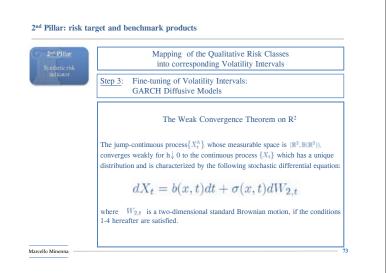








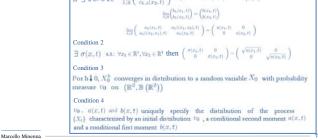




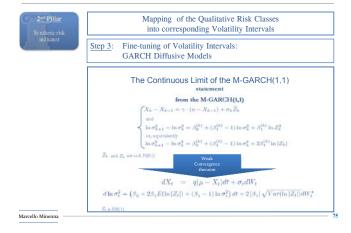
2 # Pillar Mapping of the Qualitative Risk Classes into corresponding Volatility Intervals Sended risk Step 3: Fine-tuning of Volatility Intervals: GARCH Diffusive Models Condition 1 If $\exists * \delta > 0 * t. = \lim_{t \to 0} \left(\frac{c_{i,t}(x_t)}{c_{i,t}(x_t, t)} \right) = 0$ then $\exists a(x, t)$ and b(x, t) * t.:

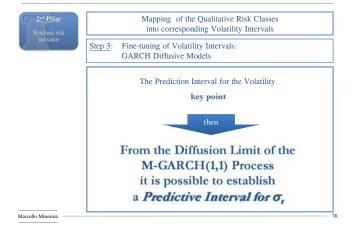
2nd Pillar: risk target and benchmark products

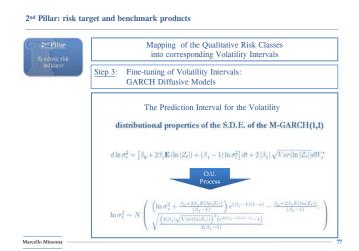
2nd Pillar: risk target and benchmark products



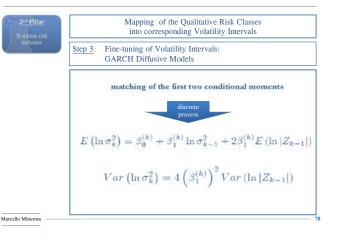
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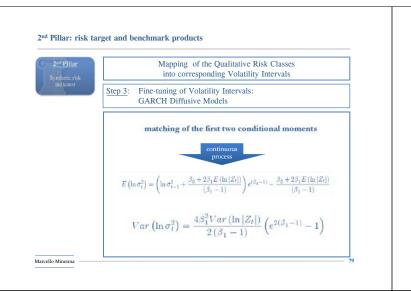


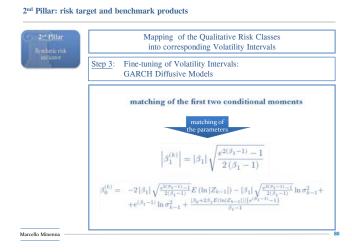




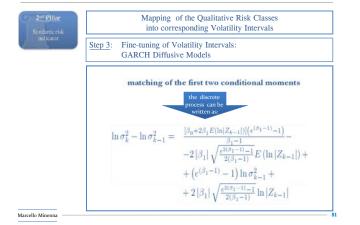
2nd Pillar: risk target and benchmark products



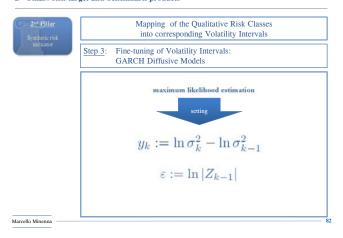


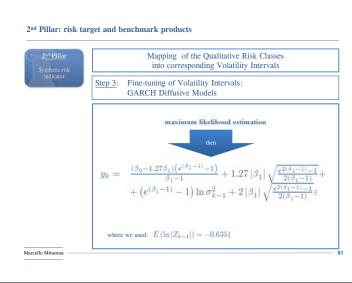


2nd Pillar: risk target and benchmark products

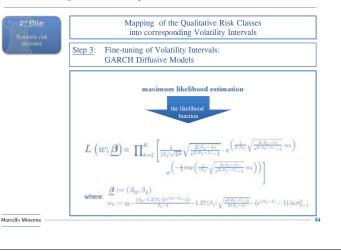


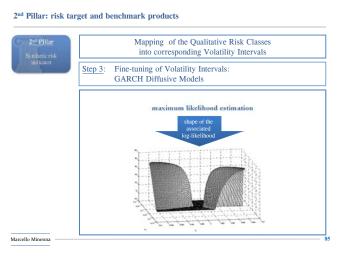






2nd Pillar: risk target and benchmark products





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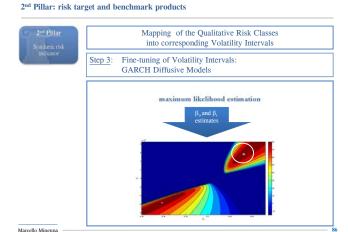
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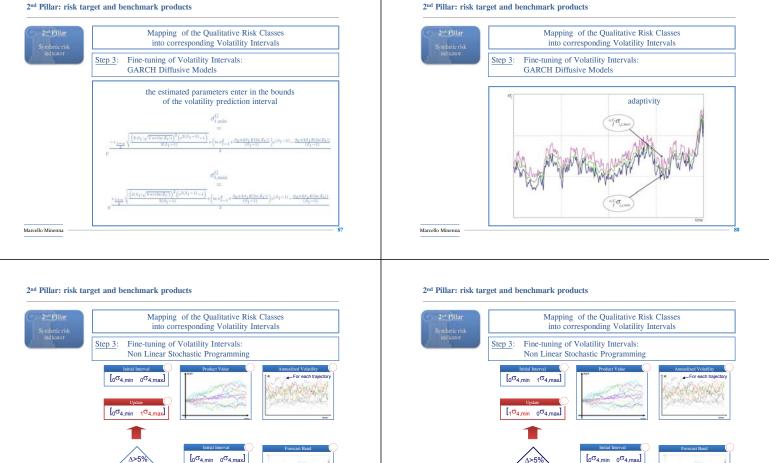
 $\begin{bmatrix} {}_0\sigma^{\rm G}_{4,min} & {}_0\sigma^{\rm G}_{4,max} \end{bmatrix}$

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$2^{nd}\ \mbox{Pillar:}\ \mbox{risk}\ \mbox{target}\ \mbox{and}\ \mbox{benchmark}\ \mbox{products}\ \ \mbox{}$



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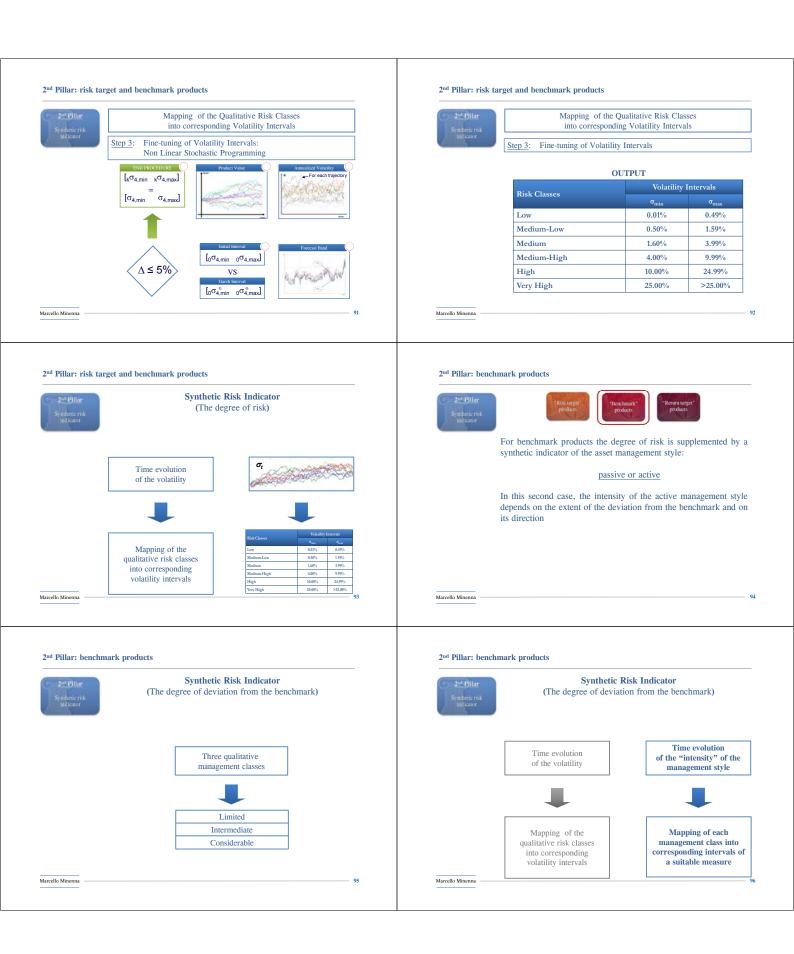
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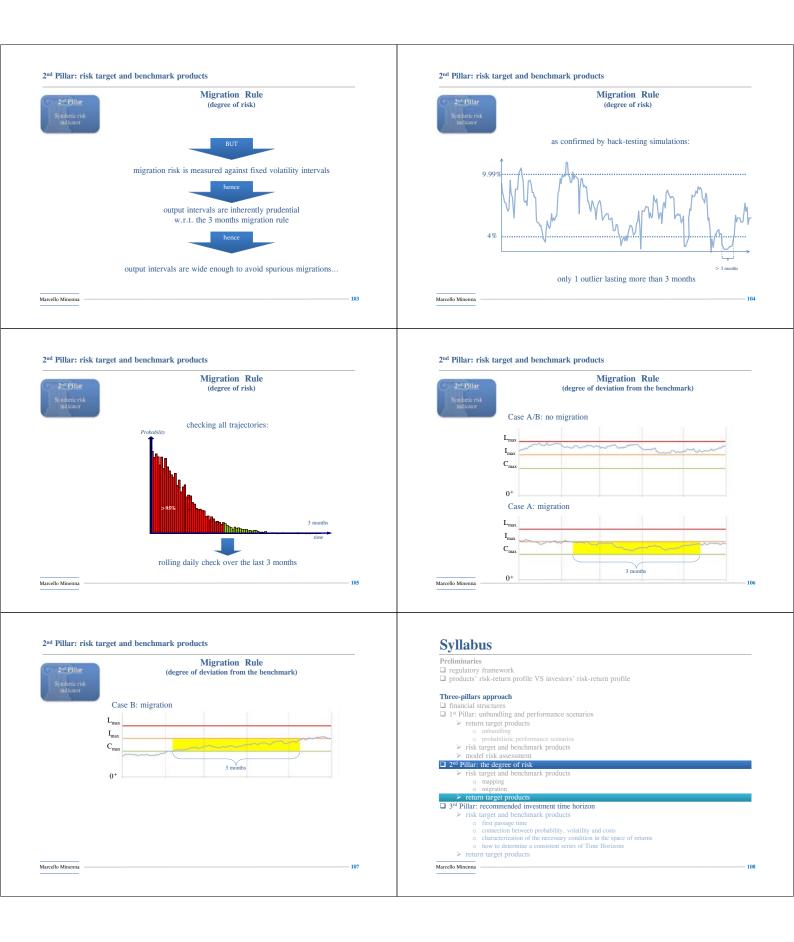
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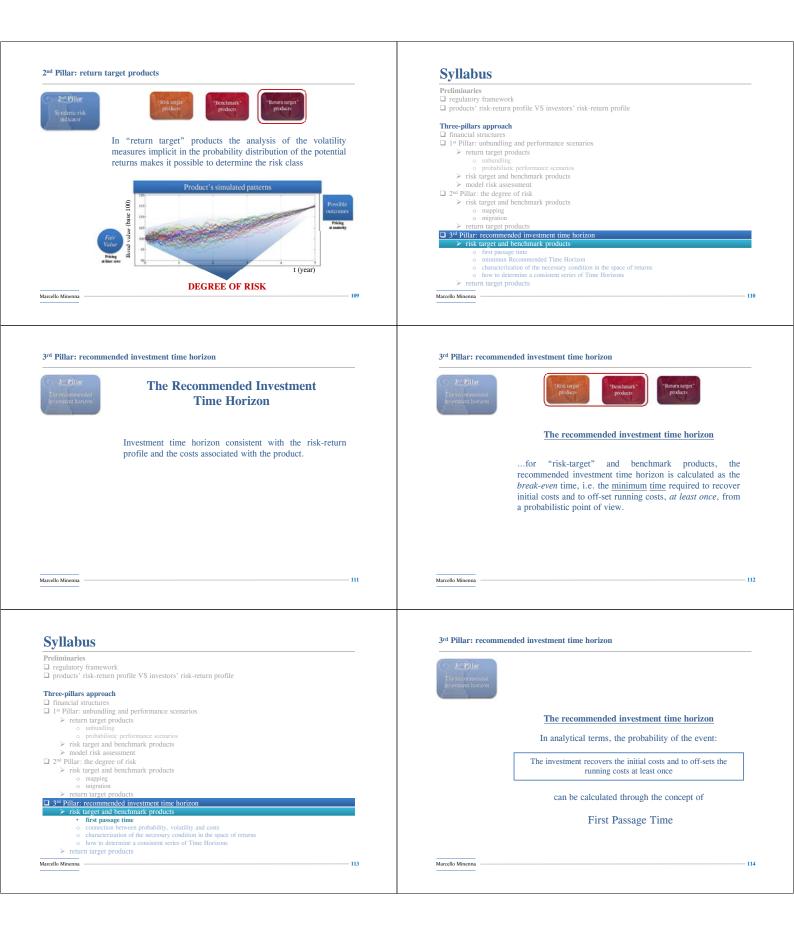
 $[_{0}\sigma_{4,min}^{G} \ _{0}\sigma_{4,max}^{G}]$

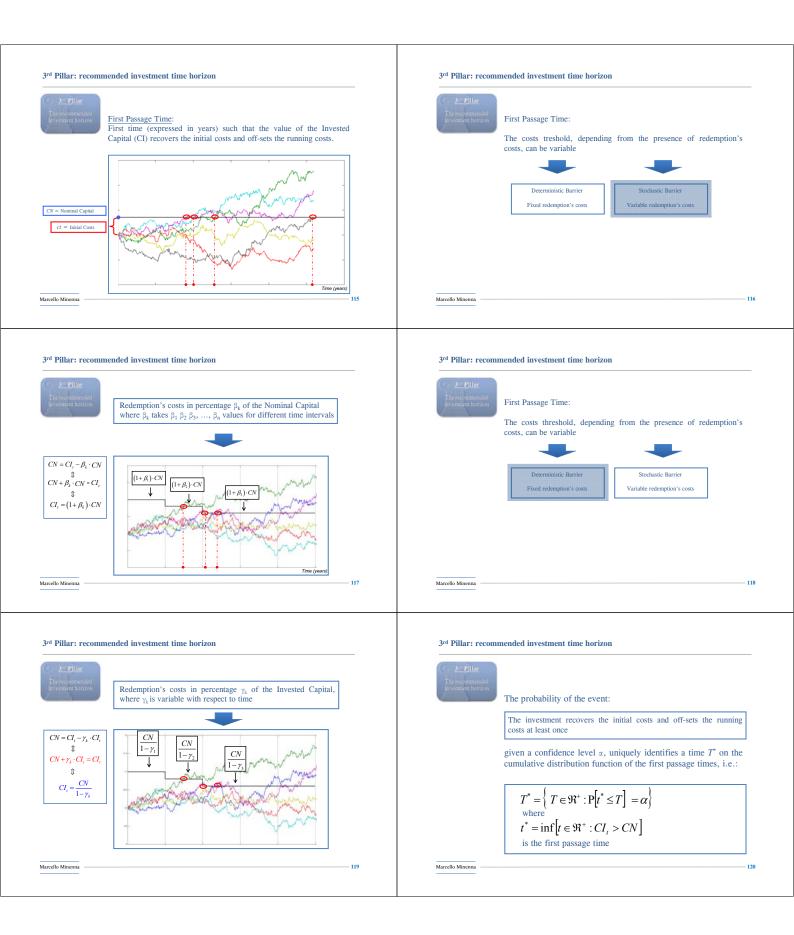
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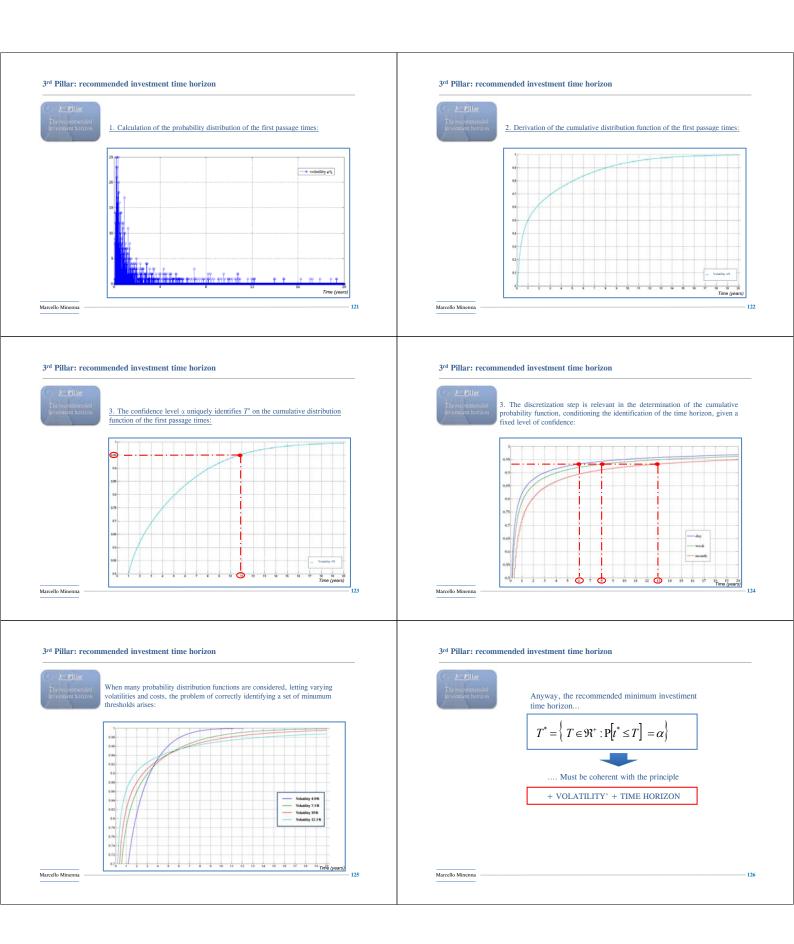


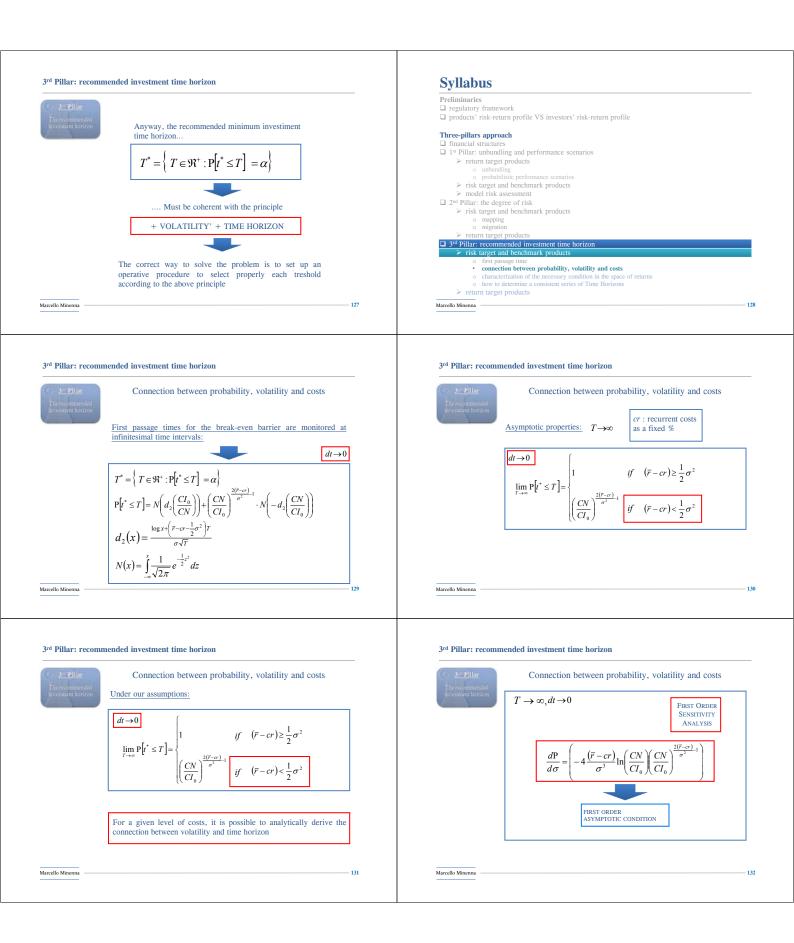
2 nd Pillar: bench								
	mark products							Syllabus
2 nd Pillar Synthetic risk indicator	Map	ping of eacl inte		ment class suitable r		esponding	2	Preliminaries rgulatory framework products' risk-return profile VS investors' risk-return profile
indicator		Choice	the a	er Volatilit delta-vol $\sigma_F - \sigma_B$	y Measure	:		Three-pillars approach financial structures I* Pillar: unbundling and performance scenarios return target products
	Risk		iited	Delta-Vo	l Intervals nediate		derable	 unbundling probabilistic performance scenarios risk target and benchmark products
	Classes	$\Delta \sigma_{\min}$	Δσ _{max}	$\Delta \sigma_{min}$	Δσ _{max}	$\Delta \sigma_{min}$	Δσ _{max}	 > model risk assessment □ 2^{nal} Pillar: the degree of risk > risk target and benchmark products
	Low Medium- Low	-0.118%	0.118%	-0.176% -0.358%	0.176%	-0.235%	0.235%	mapping migration return target products
	Medium Medium-	-0.600%	0.600%	-0.900%	0.900%	-1.200%	1.200%	 3rd Pillar: recommended investment time horizon risk target and benchmark products
	High High	-1.250%	1.250%	-1.875%	1.875% 4.668%	-2.500%	2.500% 6.249%	first passage time connection between probability, volatility and costs characterization of the necessary condition in the space of returns
rcello Minenna	Very High	-6.250%	6.250%	-9.375%	9.375%	-12.500%	12.500%	o how to determine a consistent series of Time Horizons return target products Marcello Minema 98
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	Migrations of degree of risk which can sig equity product	c or of the gnificantly	e degree	of devia	tion fron	the ber	nchmark	High
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nd Pillar: risk ta	arget and bench	mark prod figration (ynthetic]	Risk Ind	icator	99	Medium-high medium-high Marcello Minema ime Marcello Minema 100
				ynthetic 3	Risk Ind	icator	99	Medium-high Marcello Minema 2 nd Pillar: risk target and benchmark products
nd Pillar: risk ta 2 nd Pillar		figration of a contract of the second	of the Sy	tions, the uately set	width of with res	both vola	e period	Medium-high Medium-high Marcello Minema ime Marcello Minema 100
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^{2nd} Pillar: risk ta 2 nd Pillar	In order to <u>c</u> delta-vol inte taken as a ref <u>Too</u> wide inte	figration of orrectly det ervals must ference to a ervals could a detected.	of the Sy ect migra be adequessess the d result in could r	<u>itions</u> , the uately set occurrence n an <u>artific</u> result in	width of with resp e of these <u>cial</u> <u>reduct</u>	both vola pect to th phenome: tion in the	e period na. e number	Medium-high medium-high Marcello Minema me Marcello Minema me

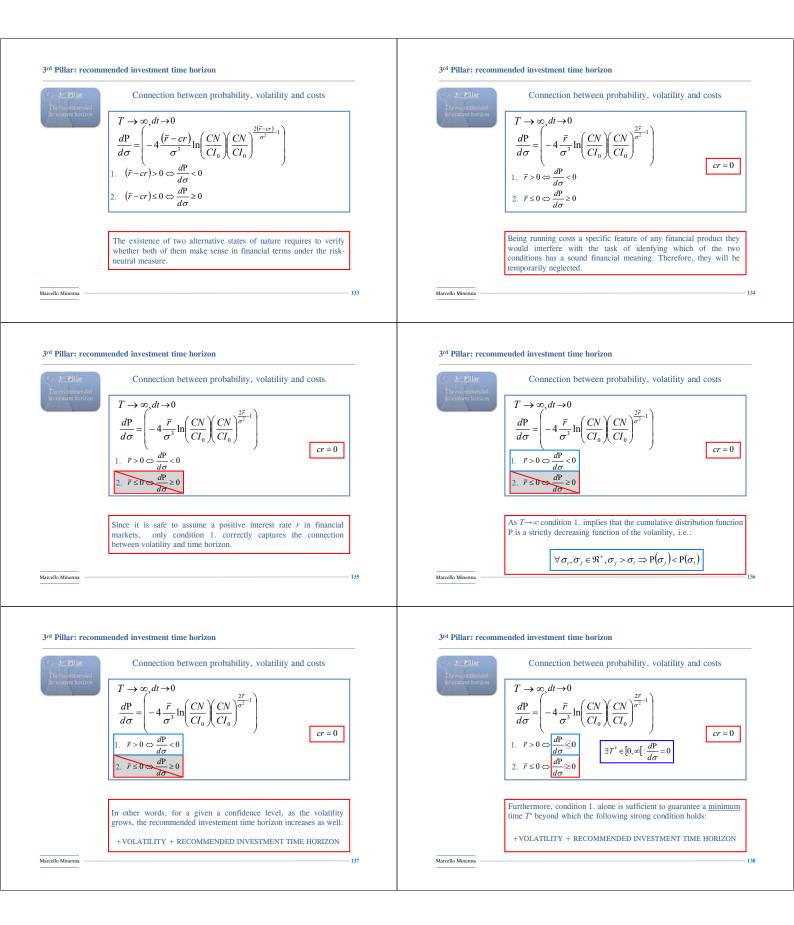


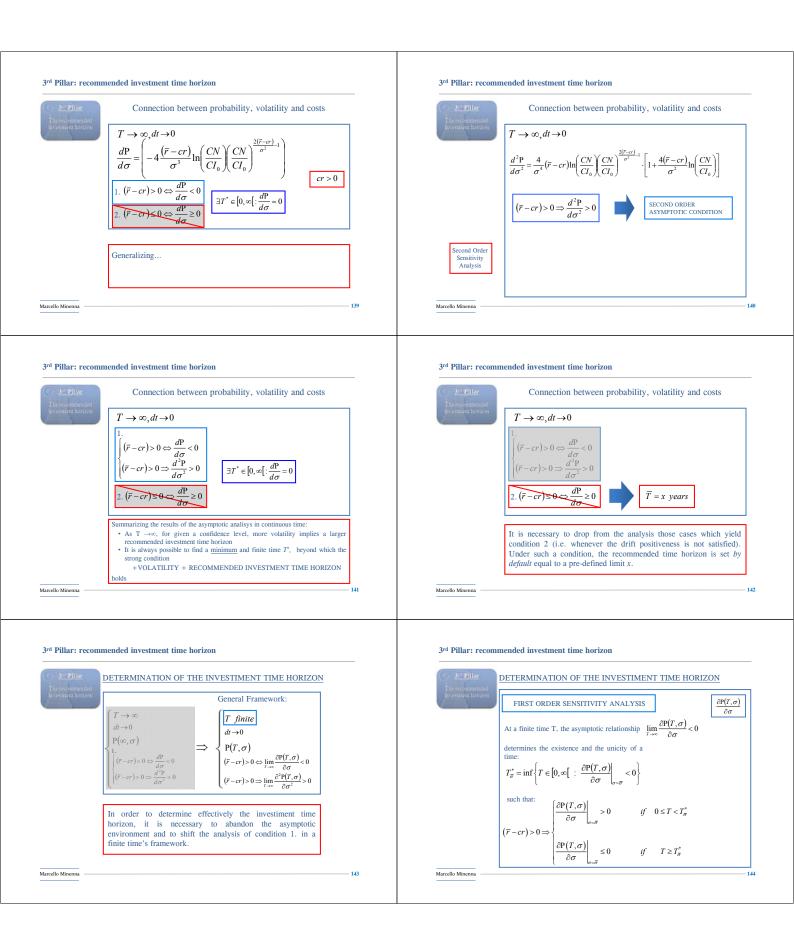


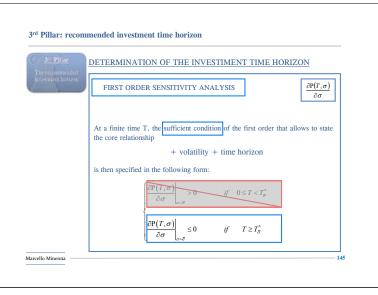




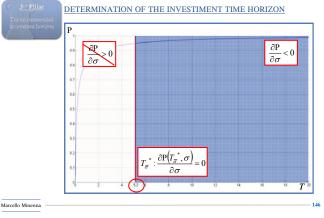




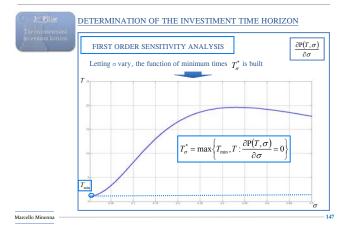




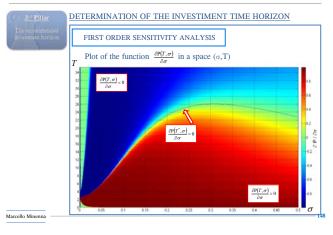
3rd Pillar: recommended investment time horizon

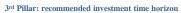


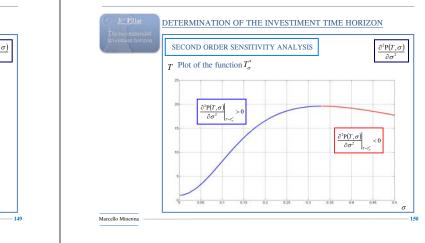
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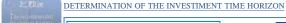




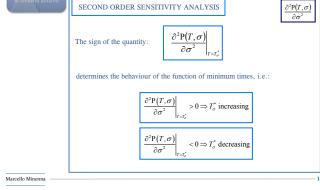


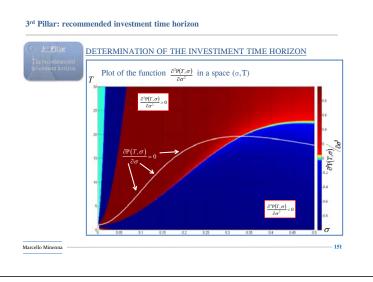


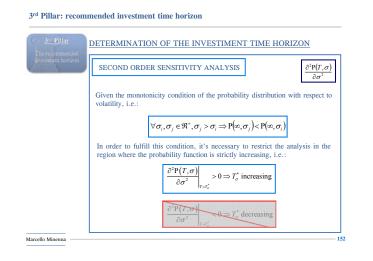




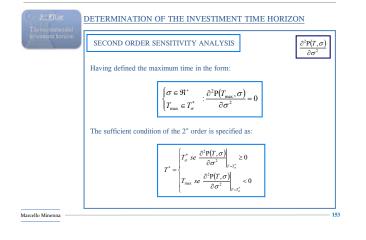
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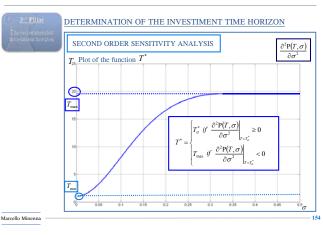




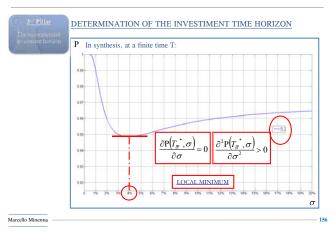


3rd Pillar: recommended investment time horizon









3rd Pillar: recommended investment time horizon

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