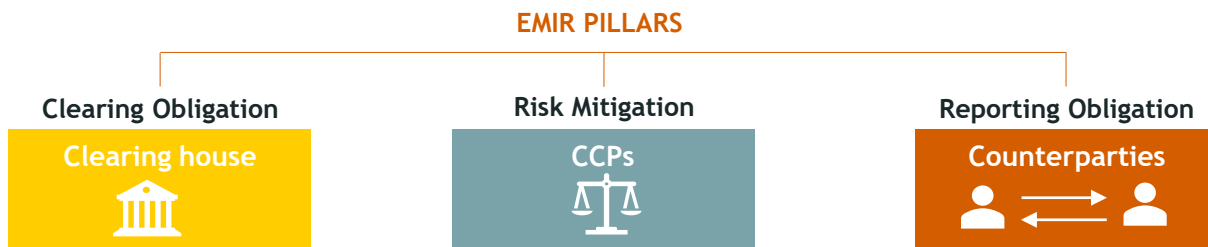




What is EMIR Refit and how is it different from EMIR?

EMIR Refit is an amendment of the previous EMIR regulation in order to reduce disproportionate costs and burdens on counterparties without compromising the objectives of the regulation nor changing fundamentally the three pillars.



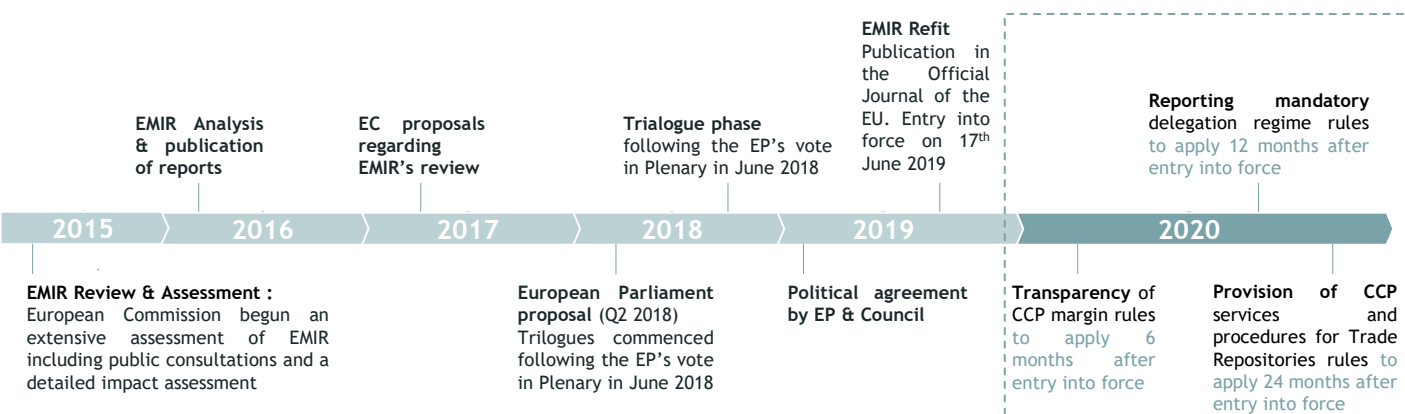
EMIR Refit key changes for derivatives market participants

EMIR Refit brings changes to certain technical aspects of EMIR but do not fundamentally amend it.. Key changes are:

- **New categorization of Financial counterparties:** Small Financial counterparties (SFC) for FCs with their OTC Derivatives position not exceeding any of the clearing thresholds. SFC will be exempt from the clearing obligation
- **Clearing obligation for specific assets by NFC+:** NFC+ whose positions exceed at least one of the clearing thresholds will be subject to the clearing obligation only for the derivatives belonging to the asset class for which the clearing threshold has been exceeded.

What next ?

Another review of EMIR is mandated within five years of entry into force of the revised regulation (by 18 June 2024).



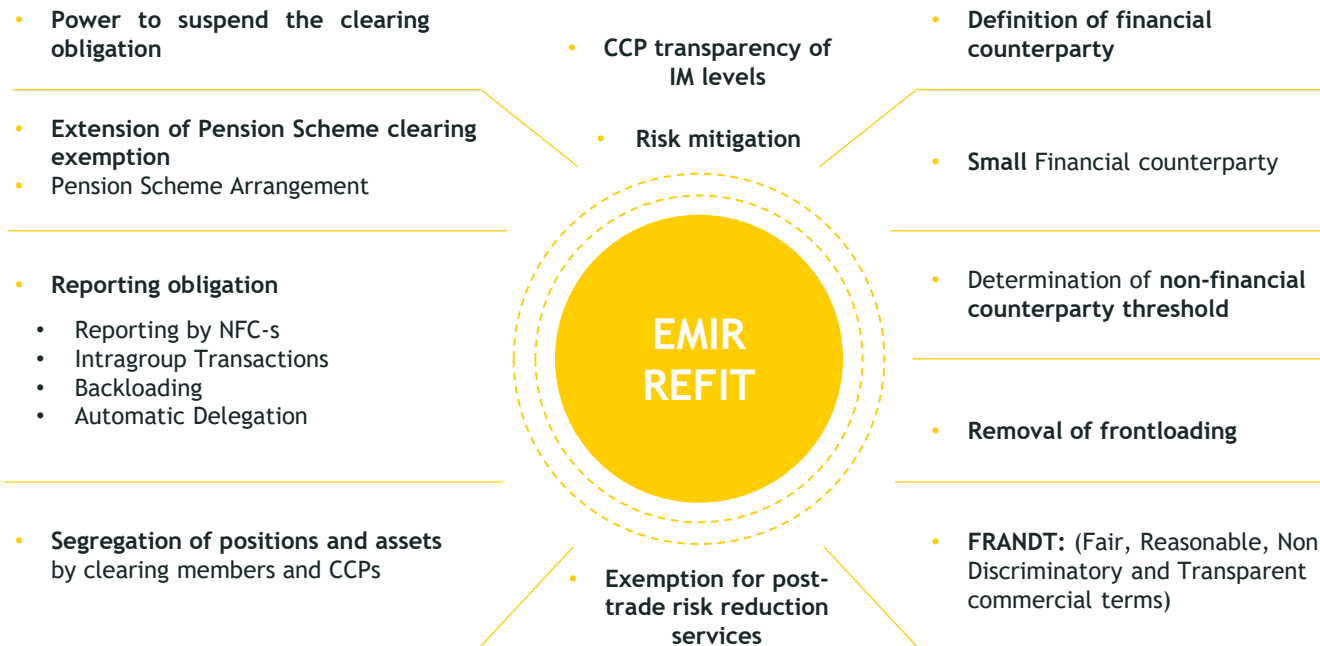
About EMIR: the European Market Infrastructure Regulation (EMIR) was developed by the EU has recommended by the Pittsburgh summit, in order to reduce the systemic risk inherent in the massive use of over-the-counter (OTC) derivatives, building up a reliable and complete data on the activity, as well as identifying pockets of concentration of end risks





EMIR - REFIT

EMIR Refit impacts



What should you be doing about the REFIT Regulation?

Although the REFIT Regulation contains some **phase-in periods**, these are relatively limited in nature. Some of the changes discussed above will require **existing processes to be updated**, **new processes to be established**, and fresh client/counterparty outreaches. The experience of implementing EMIR has demonstrated that these will require a **significant amount of preparation & time**.

How CH&Co. can help

1 Regulatory Health Check

- Audit and compliance review of current EMIR's procedures
- Review of risk management procedures
- Review of reporting processes

2 Impact Simulations

- Provide decision-making solutions by simulating impacts, projecting strategic and business related items
- Comparative Impact Analysis between EMIR and EMIR Refit

3 Implementation Support

- Regulatory Gap Analysis identifying applicability, scope and next steps to support project planning
- Full implementation support covering the entire process

