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Central Bank of Ireland

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AFG comments on the Central Bank of Ireland's Discussion paper on Exchange Traded Funds

AFG's highlights

The Association Française de la Gestion financière (AFG)[1] welcomes the occasion given to comment on the Central Bank of Ireland's consultation on ETFs. French ETFs amount to 78 983 millions € which represent 14.2% of the European domiciled ETFs as of the fist quarter 2017. Our market is the third producer of ETFs in Europe, knowing that the top 5 domiciliating European countries account for 98.9% of the market.

The mutual fund industry and ETFs have known high increases in the assets under management which is one of the reasons of the continuous scrutiny of regulators.

Funds in general (including ETFs) have been the object of continuous sectoral oversight and regulation as well as systemic scrutiny. ETFs in particular have regulalry attracted the attention of regulators with numerous consultations and subsequent rule making ("ESMA guidelines on ETFs and other UCITS issues" issued in December 2012, IOSCO's "Principles for the Regulation of Exchange Traded Funds" released in June 2013 for instance). In addition, ETFs are regulated as mutual funds and are subject as such to tight sectoral regulation. Asset management techniques are also governed by specific rules such as EMIR for derivatives or SFTR for efficient portfolio management techniques.

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[1] The Association Française de la Gestion financière (AFG) represents the France-based investment management industry, both for collective and discretionary individual portfolio managements. 600 management companies are based in France. AFG members manage 3,000 billion euros, making the Paris fund industry a leader in Europe for the financial management of collective investments (with 1,500 billion euros managed from France, i.e. 19% of all EU assets managed in the form of investment funds). In the field of collective investment, our industry includes – beside UCITS – the whole range of AIFs, such as: employee savings schemes, regulated hedge funds/funds of hedge funds, private equity funds, real estate funds and socially responsible investment funds. AFG is an active member of the European Fund and Asset Management Association (EFAMA) and of PensionsEurope. AFG is also an active member of the International Investment Funds Association (IIFA).

AFG believes that continuous scrutiny is welcome to check/understand the market evolution and eventually help ensure that no new issues arrised within the time passing. This means that we believe that at this stage there is no need in the European ETF space of further rule making. AFG strongly encourages regulators to envisage, especially in our domain which is overly regulated, such scrutiny/discussion as a check tool that may very well necessitate no action. We also believe that asset management techniques used by European funds (including ETFs) such as swap/synthetic structures or security lending schemes are now well known and constitue subjects that have been already explored in the past. We do not see any merit in potential reopening of discussions of such aspects.

Regarding more specifically matters dealt in the current DP, our members express the following main remarks:

- Our members note that the DP is based on academic research work and that it includes lots of examples and statements. However, conclusions seem not to be always drawn in relation to the topic analysed and thus appear to be disproportionate to the purported issue. This is the case for some topics (especially section 1) where no clear conclusion emerges from the CBI analysis (it seems indeed there is no issue) but CBI suggests all the same some regulatory evolutions with no clear link with the analysed topic.

- AFG observes that CBI mentions issues that have already been analysed and regulated recently by the European regulators (for instance "ESMA Guidelines on ETFs and other UCITS issues" as of December 2012). While it may be useful to depict all aspects so as to get the "big picture" on ETFs, the industry does not see any merit to go further and "re-open" for discussion some unnecessary debates (from instance liquidity and correlation issues for collateral, or risks within physical and swap-based ETFs).

- Regarding the analysis of ETF structures (Section 2), our members would like to highlight that the paper gives the impression of imbalance in the way physical and synthetic ETFs are analysed, which would be detrimental to the comprehension of the aforementioned ETF structures. Indeed, in comparison to swaps, there is less mention of securities lending (mentioned once with the same concern as forex hedging techniques) and its impact in terms of risks and liquidity. We all know that securities lending is an important management activity that needs to be analysed in the same way as the use of derivatives in a swap-based ETF. As ESMA concluded in the ESMA's 2012 Guidelines, both physical and swap-based replications have to be analysed in parallel. We strongly believe there is no need of new regulatory safeguards, but if decided, there should be an equivalent effect for both derivatives structures and those using securities lending.

    - Counterparty risk has to be emphasized in the same way for both replications. A distortion of treatment might lead to a wrong understanding of risks by the investors. For the sake of example, in § 88-89 (Section 2), the risk of under-collateralization is only mentioned in a synthetic model, whereas this risk is shared also in the physical replication, where securities lending can represent up to 100 per cent of the net asset value of many EU-domiciled ETFs. Similarly, the risk of permanent capital impairment noted in § 90 is not only related to synthetic ETF but also and in the same extent to physical ETFs.

- Collateral risk as highlighted in § 101 is to same way and extent linked both to physical and synthetic ETFs. Then, why elaborating on the collateral risk raised from swap models while ignoring a description of the risks connected to physical models? It is another illustration of the impression given by the DP's wording of a certain unequal and discriminatory treatment between synthetic and physical models. Similarly, in § 114, the risk of correlation of the collateral received by the ETF from the counterparty is only seen by the CBI as being linked to unfunded swaps, whereas this risk exists also in the physical replication.

- Liquidation of the collateral in case of failure of the counterparty as described in § 115 and 116 is not only an option in the case of synthetic ETFs but also an option for physical ETFs entering into securities lending transactions.

➢ ETFs are based on an index. The DP does not elaborate enough about the index aspects such as composition, quality, liquidity etc., and our members think those are issues to look at. For instance, the liquidity of the underlying is key. An ETF does not give any additional liquidity guarantee on the ETF underlying ("Liquidity at all costs" does not exist).

➢ It should be mentioned that spreads change over time. Also, from an economic perspective, they represent transaction related costs similar to those accounted for in entry/exit fees or swing pricing.

Please see hereafter our members' remarks by section:

Section I

A. Is public disclosure of the identity of APs and OLPs of an ETF of benefit and should regulators have a clearer view of the interconnectedness of the AP / OLP ecosystem? Should remuneration models of OLPs (and if relevant APs) be disclosed?

The list of APs, OLPs and other market makers is already public. ETF providers do publish this information on marketing materials and/or on their websites. ETF providers usually have a large number of APs, OLPs and market makers (for instance one of our members has currently more than 50).

Our members definitely reject the disclosure of remuneration data for several reasons among which:
- it is not a cost paid by the final investor as listing costs (including OLP remuneration) are borne by the asset manager (who appoints a market maker (OLP) to list and provide bid/offer quotes for its products);
- the remuneration may change over time;
- the model may vary from one provider to another.

In addition, with synthetic ETF the main OLP may also be the main swap counterparty of the ETF and in this case for example interconnectedness between this OLP and the fund (i.e. OLP being the swap counterparty) is a good thing : as the swap counterparty, the OLP has an incentive to offer tight bid/offer spread.

Public disclosure of the identity of APs and OLPs is not a problem as such. It could be seen as an improvement of ETF transparency, which is positive from an ETF provider's perspective.

Regarding interconnectedness of the Authorized Participants and the Official Liquidity Provider ecosystem, we agree with the distinction made in the discussion paper.

We think that OLP should also have an AP status. Indeed, the situation that should be avoided would be the one in which OLPs would not be able to access the primary market..
Finally, regarding remuneration models, we see no added value in making them public. Indeed, it is suitable to maintain confidentiality on these elements that have no impact on the costs borne by final investors. Therefore, transparency here seems neither useful, nor appropriate.

B. Transparency is described as the feature which enables a tight secondary market price (by comparison to net asset value) to be maintained. It also provides certainty to investors in terms of exposure achieved through the ETF. It might be the case that there are other mechanisms which achieve the same goal as transparency? If ETFs are not transparent does this have unintended consequences?

We certainly see merit in transparency. However, regarding portfolio composition of ETFs, we would like to underline that complete transparency is not necessarily suitable, notably on actively managed ETFs. For passively managed ones, transparency is granted at the index level. Complete transparency should only be granted to final investor on exposure and costs of the ETF. However, we may see merit in providing APs and OLPs with a higher degree of transparency on other issues in order to ensure an optimal functioning of the ETF's setup, in the interest of final investors.

C. Is the idea of secondary market investors dealing directly with an ETF when the AP arrangements breakdown unworkable in practice or unnecessary? Is there a better way of enabling secondary market investors to dispose of their ETF shares at a price close to the next calculated net asset value when secondary market liquidity is impaired?

This idea, which is already technically implemented through ESMA's guidelines appears to be positive even if it is complex to implement in practice. However, it should be kept in mind that such a mechanism would be useful to face technical issues blocking the secondary market, but would not solve issues arising due to liquidity issues on the underlying securities of an ETF.

D. Should ETFs warn investors that the ETF may temporarily become a closed-ended fund in certain market conditions? Would requiring an ETF to remain open-ended in a stressed market be disadvantageous to existing investors or have other unintended consequences?

ETFs are by nature open-ended funds providing exposure to a basket of underlying securities. Should these securities no longer be tradable under certain market conditions, the transfer of liquidity operated at the primary market level by the creation/redemption mechanism could no longer take place. It would therefore be detrimental to existing investors that the fund remains open-ended, given that creations could no longer be covered by the purchase of underlying securities (and/or redemptions can no longer be covered by the sale of these securities) because of the lack of tradable prices.

Under market conditions negatively impacting the liquidity of underlying instruments, or causing these to be no longer tradable, it is natural that the ETF becomes a closed-ended fund – until conditions return to normal or the fund can be liquidated.

Investors should be made aware that such a situation can arise. Our members have already introduced such disclosures in the prospectus, which detail for instance that under certain market circumstances no Net Asset Value will be published for the fund, triggering in turn a suspension of creations and redemptions. As mentioned under question N below, and for the avoidance of doubt, it should always be kept in mind that an ETF manager is not in a position to be responsible in case of secondary market disruption. In such a context, the asset manager, pursuant to ESMA guidelines (2014/937) could only be in a position to accept subscription and redemption orders from final investors.

E. Is it correct to permit share classes to be structured having regard to the operational concerns of APs and the impact this may have on secondary market pricing? Are there factors (other than those noted above) that could be relevant to ETF structuring?

Such flexibility is welcome from our point of view, as it may improve functioning of the ETF without disrupting the necessary fair treatment between shareholders.

F. What are the benefits or disadvantages of permitting listed and unlisted share classes within the same investment fund? Do listed and unlisted share classes create unfairness as between investors in the same investment fund and if so, can these be mitigated or addressed?

Here again, flexibility is welcome and we see no inconvenience in permitting listed share-classes and unlisted ones within the same fund. Fair treatment between shareholders is granted as long as shareholders invested within the same share class are equally treated in equivalent circumstances. On the contrary, investors in different share classes may receive different treatment in some aspects, in accordance with the legal documentation of the fund.

Section II

G. Are conflicts of interest rules effective for dealing with concentrations of activities within an ETF provider's financial group (e.g. group entities could act as promoter, investment manager, AP and swap counterparty or SFT counterparty)? Are other approaches worthy of consideration?

Already existing rules on conflicts of interest are effective for all types of funds, ETFs included. These entities (ETF promoter, AP, swap counterparty etc.) refer to very distinct activities inside each group and their organization does not engender new potential risks of conflicts of interests than already analyzed by the European regulators. Transparency is given to investors on the entities that interact to ensure the ETF's functioning.

UCITS legal frameworks, ESMA Guidelines on ETFs and other UCITS and EMIR/SFTR regulations already regulate the European ETF business. Conflicts of interest have been strictly regulated by the UCITS regulations, in particular potential conflicts of interests between manager/swap counterparty/lending agent is managed and properly mitigated by the best execution obligation.

ETF asset managers are regulated entities that have to comply with strict best execution rules. Swap counterparties are selected through a Request for Proposal - RFP (that encompasses the swap aspect but may also include other services such as market making as the case may be), and entities are selected on numerous criteria so as to ensure investors' best interests and accordingly with best execution principle described by the asset manager. The fund legal documentation (fund's prospectus for instance) mentions the RFP procedure and the swap counterparty selection process is disclosed either in the prospectus or on the asset manager website.

In addition, we would like to insist on the fact that ETF providers have put in place internal guidelines in terms of risks management as well as disclosure to investors (management rules, securities lending policy, swap management, risks data etc.) on their website. In addition to the applicable regulations, ETF providers apply self-imposed best practices. Indeed, ETF providers improved their disclosure rules and practices over time, so as to take clients' expectations into consideration. The ETF space is a highly competitive sector leading the ETF providers to constantly adapt to the ETF market needs and apply a high degree of transparency.

H. Are multiple counterparties necessary, or appropriate for ETFs? Could they expose ETFs to unintended risks and consequences?

AFG members believe there is no specific issue relative to the number of counterparties nor unintended risks.

First, because counterparties' issues ultimately refer to counterparty risk. On that field, several regulations are in place, including the recent implemented EMIR regulation that is meant to reduce counterparty risk.

Synthetic ETF providers choose their swap counterparties through a best selection/execution process (RFP). These counterparties (even single counterparties sometimes) are high quality counterparties with a high rating. In addition, synthetic ETF providers may have set internal rules in terms of swap management and disclosure, such as:

- daily reset: where the counterparty risk level is set at zero each end of day (whereas UCITS requires to apply a 10% limit per counterparty) with assets' buying/selling in order to reach this target
- disclosure of the assets of the fund
- strict guidelines in terms of assets quality (application of the ESMA's Guidelines pertaining to items such as quality, liquidity, daily pricing, diversification).

These best practices lower the risk to a minimum, going beyond what is required. In unfunded swaps, the structure used by AFG members, ETFs' assets bought/sold from/to the swap counterparty/ies <u>belong</u> to the fund and are kept on <u>segregated accounts</u> at the custodian.

I. Some academic research suggests that if a synthetic ETF experiences counterparty default, the synthetic ETF is more likely to be able to deliver the performance of its underlying index if the collateral received is correlated to that index. Should collateral received (where a funded model is used) or securities purchased (where an unfunded model is used) be correlated to the index being tracked? Is this practical, particularly for example where the index tracked by an ETF is comprised of securities which may be relatively expensive to access? Is collateral quality sufficiently regulated and disclosed?

First of all, it has to be mentioned that the idea of requiring correlation between collateral received and the index was introduced in ESMA's Consultation Paper of Sept. 2011 but it was finally abandoned: it clearly appeared that such correlation did not bring additional security to the existing requirements. Moreover, requiring a correlation between collateral and index would jeopardize the benefit of using portfolio management/optimization techniques. In case of securities lending transactions (used by physical ETFs), the benefit of the securities lending would be lost if securities received as collateral by the fund were identical or similar to those lent. The same applies for synthetic ETFs: Outperformance generated by total return swap would be alleviated or aborted with no added benefit.

As of today we do not consider that provisions on the quality and the type of assets constituting the collateral should be further developed as proposed by the CBI. ESMA Guidelines already provide for stringent collateral requirements for UCITS, and we consider that they are sufficient.

Secondly, it is important to remind that counterparty risk is present in both ETF structures: with the use of securities lending in physical ETFs and with the use of the total return swap in synthetic ETFs. As with any efficient portfolio technique used by funds, the collateral received with these OTC transactions represents a second layer defense, a 'safety portfolio' that is meant to be sold immediately in case of the OTC counterparty's default. Obviously, this applies to a swap but also to a securities lending transaction. Therefore, the analysis and correlation proposal underlined in the DP is flawed and has no meaning if understood as a specific case for synthetic ETFs. We fully disagree with considering only synthetic ETFs in this approach.

All that said, what is the purpose of collateral? Collateral is provided to secure a claim and should not be confused with portfolio assets. Collateral is not meant to become a portfolio asset and is expected to be highly liquid since it has to be sold quickly and efficiently.

Let's take the case of a non-investment grade bond AIF that uses EPMs such as reverse repos. No one would expect in a high yield debt portfolio to secure a reverse repo with high yield debt merely because the fund is invested in HY or junk bonds.

The correlation issue of the collateral is linked with the counterparty, because a high correlation would de facto limit the second layer security offered by the concept of collateral. Requiring correlation between the assets of the portfolio and the collateral is in fact requiring roughly the same thing on both sides of the deal. This changes radically the economy of the instrument.

The ESMA Guidelines on ETFs and other UCITS issued in 2012 defined a list of criteria applicable to all collateral of UCITS funds in box 43, both for OTC derivatives and securities lending transactions: liquidity, valuation, issuer credit liquidity, diversification and correlation. It is stated that "*the collateral received by the UCITS should be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty*". We fully agree with this requirement since the risk relies on the economic direct link with the counterparty.

Now, what are the risks of having collateral that differs very much from the index portfolio? There is only one risk: the risk of not respecting the counterparty risk limit: if the market moves in different directions very strongly, the counterparty risk limits (5% or 10% by counterparty) could be breached. In fact, counterparty risk limits create an incentive for the ETF manager to request some collateral that is well correlated to the index that is replicated. And we see that in practice: equity ETFs have collateral equity, bond ETF have bond collateral. There could be some natural tendency to use collateral that is correlated to the index that is replicated, but in no case this should be a requirement.

Regulations in terms of correlation could have a negative effect, because it is in the best interest of investors to give the manager some flexibility in order to optimize the return of his fund. For example, in a securities lending transaction, the fund manager may prefer, in some instances, in order to respect the counterparty limits at all times, to have some over-collateralization, but some badly correlated assets. For another fund, the fund manager may prefer to have well correlated asset, but to be closer to the counterparty limit.

It is also not always possible to have a collateral that is close to the index. For example, this is not possible for commodities indices (according to UCITS diversification rules). There are also cases where it may be easier and preferred by investors, to have a collateral that is not linked to the index; for example, in ETFs indexed on emerging markets indices. In this case having a correlated collateral consisting of emerging securities would significantly increase costs and risks. There are also often tax considerations to take into consideration and that make it more appropriate to use a specific collateral.

We strongly believe that the current regulation on these matters are sufficient. If nevertheless collateral rules were to be further developed, the only sensible requirement could be that the collateral should at least be of an equivalent or better quality than that of the index being tracked. In this situation, an ETF tracking an emerging market index could have collateral comprising the securities from the same index or developed market securities but at the same time an ETF tracking a developed market index could not be backed by collateral comprising emerging market securities.

Finally, there is no reason and no added value in making a case of synthetic ETFs nor adding rules on the management of collateral. There are sufficient regulatory safeguards.

Section III

J. Are active strategies appropriate for "housing" in an ETF structure and if so, is there a limit to the type of strategy that would be appropriate? If the ETF structure provides opportunities for managers to achieve scale is there a downside to this where the strategy is active (or, if scale is achieved, its potential impact is not otherwise capable of being ascertained)?

Our members think active strategies may be "housed" in an ETF structure. It should be underlined that the European regulatory authorities, (ESMA in particular), share this view. Indeed, ESMA's guidelines (2014/937) clearly state that it is possible to create actively managed ETFs. Regarding the possible limits in terms of types of strategies, our members' view is that it is the asset manager's role and responsibility to determine whether or not a strategy can be implemented through an ETF structure. One of the key elements to be taken into consideration should be the liquidity of the assets in which the ETF invests.

K. Similar to the question posed in Section I, is portfolio transparency fundamental to the nature of an ETF or are there are other mechanisms which achieve the same goal as transparency? In the context of an active ETF, is transparency essential in order to achieve a liquid market and to facilitate efficiency in pricing?

Portfolio transparency should be given by the asset manager to the market makers and to the relevant regulators. Indeed, the necessity of such transparency towards regulators cannot be contested. Transparency is also needed by the market makers in order for them to be able to fulfill their own obligations towards trading venues on which they ensure the ETF's liquidity.

Still, it is not suitable at all to provide full portfolio transparency to final investors or to the public. It should be kept in mind that active strategies are based on a fund manager inner conviction and skill (can be considered as his intellectual property) and should not be made fully transparent.

Section IV

L. Some commentators are concerned that ETFs are tracking indices of underlying stocks which are not sufficiently liquid to match the intra-day liquidity on the secondary market which the ETF offers. This statement is quite simplistic and does not, for example, reflect that there may be much secondary market activity but very little primary market activity. UCITS, including UCITS ETFs, are subject to general liquidity management rules which should ensure that ETFs track indices of underlying stocks that are sufficiently liquid to allow the ETF to meet creation and redemption requests. Is this sufficient? What liquidity practices do ETFs follow? Are there other practices that might be appropriate for ETFs?

As correctly pointed out in the paper, the key element of ETFs in this regard is the AP mechanism, allowing liquidity transmission between ETFs and underlying securities. We deem the UCITS rules to be sufficient in that regard.

M. One of the potential impacts from greater investment in index-tracking ETFs is decreased informational efficiency of underlying securities as well as increased non-fundamental volatility of underlying securities. However, these may not be risks *per se* or, at any rate, may not be risks that ETF providers or regulators can mitigate, manage or eliminate. Is this assessment correct or could measures be taken to address this impact?

Liquidity is indeed a complex concept and assessing the liquidity impact of ETFs/index/beta directional funds globally may be difficult.

Our members agree with the DP's remark that there is no conclusive evidence at this stage of the impact of ETFs on informational efficiency or non-fundamental volatility. In addition, ETFs would not be any different from much larger index funds in that regard, and should be looked at in a similar light.

N. One of the key issues in the context of support by ETF providers is investor expectation. Investors' views about purchasing ETFs and their ability to sell may be informed by whether or not the ETF provider will support the ETF in the face of stress events. There are, however, divergent views amongst ETF providers as to whether they would support their ETFs. Is provider support a desirable objective?

First, AFG members would require clarification on what "support" means: what features does CBI consider under this wording? To support the market making activity (in finding other market makers/APS) in case of stressed markets? Or to find an alternative way of disposing ETFs units to the asset manager if there is no secondary market? Or to provide a kind of financial guarantee to ETF investors if there is a fail/default of an entity in the "ETF chain/ecosystem"? Our members think that this section is somewhat unclear.

Second, recent regulations such as EMIR and SFTR help dealing with liquidity risks for ETFs in case of the counterparty's default.

If regulatory safeguards were to be envisaged, it should be kept in mind that secondary markets are in no way under the asset manager's responsibility. Indeed, trading venues on which ETFs are traded should remain fully responsible for these aspects, and therefore should ensure they have satisfying and secure rules in this regard.

Last, it should be reminded that ETFs, like any other investment management fund[2], are not "guaranteed" funds as the investor bears the market risk. They do not benefit from a "sponsor support" and no "promise" of that kind is given to the investor. AFG believes that there is no step-in risk in regulated funds (as ETFs are).

In this respect, we would like to recall that asset managers act as agents for clients that pay them to run their money according to the risk/return profile they agree upon. It is the "promise" of the fund, its investment objective that informs investors on the risks they take. This means there is no risk on the balance sheet of the asset manager. AFG advocates strongly that the bulk of asset management funds do not constitute a case for step-in risk. European funds (such as UCITS / locally regulated AIFs such as money market funds or ETFs) benefit from tight rules (valuation, investment management and risk spreading ratios, asset eligibility restrictions, reporting and disclosure requirements etc) that are highly protective for investors and cannot be considered as "shadow banking".

Section V

O. The Central Bank is primarily interested in risks associated with Irish authorised ETFs and European ETFs more generally yet much of the available academic literature, analysis and data relates to US ETFs. The concern is that any analysis of Irish authorised and European ETFs may be adversely affected by reliance on US-centric materials. Is this valid? Are Stakeholders aware of EU ETF specific information that might lead to different conclusions? Will MIFID II resolve these data issues?

AFG members clarify that US and European ETFs work differently on certain aspects. As a general remark, and as mentioned in the answer to question P below, it can be considered that UCITS and MIFID regulatory frameworks create a satisfying level of investor protection. More specifically, regarding MIFID 2 evolutions, they can be expected as having positive impact on ETF market in the European Union, notably in terms of data transparency.

P. Does the nature of an ETF have peculiarities (and therefore risks) that neither the UCITS nor MiFID regulatory frameworks, either in isolation or in conjunction, address and which we have not examined here?

We consider that the above mentioned pieces of regulation, taken either in isolation or in conjunction, properly address risks related UCITS funds in general, and ETFs in particular. We also would like to underline that in our view the present discussion paper globally examines all relevant topics related to ETFs.

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[2] AFG would like to recall that this aspect of « sponsor support » has been analysed in depth with money market funds and that the European co-legislators decided with the Money Market Fund Regulation released on 30 June this year to ban any such « sponsor support » so that investors do not rely on a false impression of « implicit guarantee » on the fund. Investors in mutual funds (unless they exceptionally offer an explicit guarantee given by a third party entity prudentially regulated) should always understand that market risks are borne by them.

As a concluding remark, we would like to insist on the fact that checking and analysing aspects of investment funds' functioning does not automatically mean that the exercise should result in additional regulatory safeguards. We have an extensive, detailed and comprehensive European regulation that proves resilient.

If you need any further information, please don't hesitate to contact me at +33.1.44.94.94.31 (a.gurau.audibert@afg.asso.fr).

Sincerely Yours,

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