

June 1, 2022

Closed Days Template Guidance – Equity Derivatives

UK Queen Platinum Jubilee 2022

The International Swaps and Derivatives Association, Inc. (“ISDA”) announces the following guidance for parties to over-the-counter equity derivatives transactions that are affected by the Queen’s Platinum Jubilee in the UK.

On November 12th, 2020 (the “Announcement Date”), the UK Government announced (the “Announcement”) that the Spring Bank Holiday in 2022 will move from Monday, May 30th, 2022 to Thursday, June 2nd, 2022 and that an additional Bank Holiday will be observed on Friday, June 3rd, 2022 to mark the 70th anniversary as monarch of Her Majesty Queen Elizabeth II.¹

As a consequence, it is ISDA’s understanding that on June 2nd and 3rd, 2022 the London Stock Exchange², the equity securities clearance and settlement systems in the UK and UK commercial banks are expected to be closed (including for dealings in foreign exchange and foreign currency deposits) and that Euronext London will also be closed for trading.

ISDA understands that on May 30th, 2022, the London Stock Exchange, the equity securities clearance and settlement systems in the UK and UK commercial banks are expected to be open (including for dealings in foreign exchange and foreign currency deposits) and that Euronext London will also be open for trading.³

ISDA understands that the London Stock Exchange updated their trading calendar in response to the Announcement on August 31st, 2021.

ISDA is issuing this guidance in the interest of mitigating market risk and the promotion of orderly and efficient valuation and settlement of positions by market participants. This guidance illustrates the consequences of the above market closures based on the default provisions described in the main equity definitional booklets, a master confirmation agreement template and other ISDA published documentation expressly referred to in this guidance. ISDA understands that parties frequently bilaterally agree to amend the provisions of those definitional booklets, that master confirmation agreement template and other ISDA published documentation when executing trades or agreeing the

¹ <https://www.gov.uk/government/news/extra-bank-holiday-to-mark-the-queens-platinum-jubilee-in-2022>

² <https://www.londonstockexchange.com/trade/trading-access/business-days>

³ Euronext London is the part of the broader Euronext trading platform that provides for trading in derivatives on UK underlying securities. ISDA understands that derivatives contracts offered by Euronext London in respect of UK securities follow the trading calendar of the exchange on which such UK underlying securities are listed (e.g. the London Stock Exchange). Therefore, ISDA understands that on June 2nd and 3rd, 2022 it will not be possible to trade derivatives contracts linked to UK underlying securities on the Euronext trading platform and that this should be considered as a ‘closure’ of Euronext London on those days. ISDA understands that on May 30th, 2022 it will be possible to trade derivatives contracts linked to UK underlying securities on the Euronext trading platform.

terms of their trading relationships. This guidance does not cover any such deviations. This guidance includes a description of provisions contained in the main equity definitional booklets, that master confirmation agreement template and other ISDA published documentation expressly referred to in this guidance that may be relevant to market participants. **This guidance is not legal advice and market participants should consult their legal advisors as appropriate.** Market participants should not rely on this guidance for any purpose but should review the contractual terms of each affected transaction in order to understand the effects of the events described above. ISDA does not assume any responsibility for this guidance and it is not intended to set a precedent. Parties are not obliged to follow this guidance and may choose alternate means of addressing the aforementioned event. In addition, firms should consider contacting their counterparties to discuss the consequences for their transactions.

For transactions executed on electronic confirmation platforms, market participants should refer to the contractual terms of the applicable confirmation platform.

Please note that this guidance may be updated from time to time.

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Guidance

1 2002 ISDA Equity Derivatives Definitions (the “2002 Equity Definitions”)⁴

1.1 *Exchange Business Days; Scheduled Trading Days*

May 30th, 2022

ISDA understands that the London Stock Exchange and Euronext London (the “**London Exchanges**”) will be open for trading on May 30th, 2022 (the “**Original Bank Holiday**”) and therefore, unless parties otherwise agree, such date should be treated as an Exchange Business Day for those exchanges.

This guidance has been produced on the basis that May 30th, 2022 is a Scheduled Trading Day when the London Exchanges are the Exchange and/or Related Exchange for a Transaction. This is consistent with the approach adopted in relation to previous guidance ISDA where the relevant announcement of a change in trading schedule has been made in advance of the relevant date.

However, ISDA is aware that some market participants have interpreted ‘Scheduled Trading Day’ by reference to the schedule of an Exchange/Related Exchange as at the Trade Date of the relevant Transaction and may therefore consider May 30th, 2022 to be a non-Scheduled Trading Day. Where parties adopt this approach to a Scheduled Trading Day then, for the purposes of a Transaction with a Trade Date prior to August 31st, 2021⁵, May 30th, 2022 will not be a Scheduled Trading Day for the London Exchanges and, unless otherwise described below, the guidance set out in this document should be adjusted accordingly.

June 2nd and 3rd, 2022

ISDA understands that the London Stock Exchange and Euronext London will not be open for trading for their respective regular trading sessions⁶ on June 2nd and 3rd, 2022 (the “**Rescheduled Bank Holidays**”) and therefore the Rescheduled Bank Holidays should not be treated as Exchange Business Days for those exchanges (either as they are not deemed to be Scheduled Trading Days (see second paragraph below) or they are deemed to be Scheduled Trading Days, but the London Exchanges do not open (see third paragraph below)).

The Announcement was made eighteen months prior to the Rescheduled Bank Holidays. This guidance has therefore been produced on the basis that the closures of the London Exchanges

⁴ This Section of the guidance covers Transactions documented under the 2002 Equity Definitions and also Transactions documented under the master confirmation agreements detailed below. It does not cover any additional supplements, master confirmations or standard terms used in conjunction with the 2002 Equity Definitions.

⁵ Given the earlier Announcement Date of November 12th, 2020, some market participants adopting this approach may agree to treat May 30th, 2022 as a non-Scheduled Trading Day for the purposes of any Transaction with a Trade Date that is prior to that Announcement Date rather than prior to the date on which the schedules of the London Exchanges were updated (which was August 31st, 2021).

⁶ Euronext London is a part of the Euronext trading platform providing for trading in derivatives on UK underlying securities. ISDA understands that on June 2nd and 3rd, 2022 it will not be possible to trade derivatives contracts linked to UK underlying securities on the Euronext trading platform and that this should be considered as a ‘closure’ of Euronext London for its regular trading session on those days.

are scheduled and that the Rescheduled Bank Holidays are therefore not Scheduled Trading Days when either the Exchange or Related Exchange is one of the London Exchanges. This is consistent with the approach adopted in relation to previous guidance ISDA has issued in relation to market closure events.

However, ISDA is aware that some market participants have interpreted ‘Scheduled Trading Day’ by reference to the schedule of an Exchange/Related Exchange as at the Trade Date of the relevant Transaction and may therefore consider the Rescheduled Bank Holidays to be Scheduled Trading Days when either the Exchange or Related Exchange is one of the London Exchanges. Where parties agree that the Rescheduled Bank Holidays constitute a non-scheduled closure for the purposes of a Transaction with a Trade Date prior to August 31st, 2021⁷, then the Rescheduled Bank Holidays should not be treated as Exchange Business Days but should be treated as Scheduled Trading Days that are Disrupted Days and, unless otherwise discussed below, the guidance set out in this document should be adjusted accordingly in accordance with the consequences for Disrupted Days set out in the 2002 Equity Definitions and, if relevant, in the applicable Master Confirmation Agreement.

1.2 *Exercise/expiration of Option Transactions*

May 30th, 2022

If a Commencement Date, Potential Exercise Date (Bermuda Option) or Expiration Date falls on the Original Bank Holiday, such Commencement Date, Potential Exercise Date or Expiration Date will occur on such date, unless the parties have agreed to treat the Original Bank Holiday as a non-Scheduled Trading Day (see above), in which case, such Commencement Date, Potential Exercise Date or Expiration Date should instead be the next following Scheduled Trading Day (expected to be May 31st, 2022).

If the parties have agreed to treat the Original Bank Holiday as a non-Scheduled Trading Day, then if the Original Bank Holiday falls in the Exercise Period for an American Option and the notice of exercise is given on the Original Bank Holiday, then that notice will be deemed given on the next following Scheduled Trading Day (expected to be May 31st, 2022).

June 2nd and 3rd, 2022

If a Commencement Date, Potential Exercise Date (Bermuda Option) or Expiration Date falls on any of the Rescheduled Bank Holidays, such Commencement Date, Potential Exercise Date or Expiration Date should instead be the next following Scheduled Trading Day (expected to be June 6th, 2022). If the Rescheduled Bank Holidays fall in the Exercise Period for an American Option and the notice of exercise is given on any of the Rescheduled Bank Holidays, then that notice will be deemed given on the next following Scheduled Trading Day (expected to be June 6th, 2022).

1.3 *Valuation of Options, Swaps and Forwards*

⁷ Given the earlier Announcement Date of November 12th, 2020, some market participants adopting this approach may agree to treat June 2nd and 3rd, 2022 as Scheduled Trading Days that are Disrupted Days for the purposes of any Transaction with a Trade Date that is prior to the Announcement Date rather than prior to the date on which the schedules of the London Exchanges were updated.

Valuation Date

May 30th, 2022

If a Valuation Date in respect of a Transaction falls on the Original Bank Holiday, such Valuation Date should take place on such date, unless the parties have agreed to treat the Original Bank Holiday as a non-Scheduled Trading Day, in which case the Valuation Date would instead be the next following Scheduled Trading Day (expected to be May 31st, 2022).

June 2nd and 3rd, 2022

If a Valuation Date in respect of a Transaction falls on any of the Rescheduled Bank Holidays, such Valuation Date should instead be the next following Scheduled Trading Day (which is expected to be June 6th, 2022).

If Futures Price Valuation applies to an Index Transaction, and the Official Settlement Price is published on the Valuation Date, such day should be treated as the Valuation Date irrespective of whether such day is a Scheduled Trading Day.

Averaging Dates

May 30th, 2022

If an Averaging Date in respect of a Transaction falls on the Original Bank Holiday, such Averaging Date should take place on such date, unless the parties have agreed to treat the Original Bank Holiday as a non-Scheduled Trading Day, in which case the Averaging Date would instead be the next following Scheduled Trading Day (expected to be May 31st, 2022).

June 2nd and 3rd, 2022

If an Averaging Date in respect of a Transaction falls on any of the Rescheduled Bank Holidays, such Averaging Date should instead be the next following Scheduled Trading Day (which is expected to be June 6th, 2022).

1.4 *Payments and deliveries*

May 30th, 2022

It is ISDA's understanding that commercial banks and equity securities clearance and settlement systems will be open on the Original Bank Holiday. Accordingly, the Original Bank Holiday will be a Currency Business Day and a Clearance System Business Day in London. Any payment in respect of a Cash Settlement Payment Date, Premium Payment Date, Dividend Payment Date, Prepayment Date, Initial Exchange Date or Final Exchange Date falling on the Original Bank Holiday should be made on that date.

Any delivery in respect of a Settlement Date falling on the Original Bank Holiday should also be made on that date.

June 2nd and 3rd, 2022

It is ISDA's understanding that commercial banks and equity securities clearance and settlement systems will not be open on each of the Rescheduled Bank Holidays. Accordingly,

each of the Rescheduled Bank Holidays will not be a Currency Business Day or a Clearance System Business Day in London.

In respect of a Transaction where the Settlement Currency is GBP, if any of the Cash Settlement Payment Date, Premium Payment Date, Dividend Payment Date or Prepayment Date that is specified in the Confirmation falls on a Rescheduled Bank Holiday (or is otherwise determined by the terms of the Confirmation to fall on a Rescheduled Bank Holiday), such date will instead be the next following Currency Business Day for GBP, expected to be June 6th, 2022. Payments in respect of a Transaction where the Settlement Currency is GBP which are due on an Initial Exchange Date, Final Exchange Date or Prepayment Date (where the Prepayment Payment Date is not otherwise specified in the Confirmation) that is specified to fall on a Rescheduled Bank Holiday (or is otherwise determined by the terms of the Confirmation to fall on a Rescheduled Bank Holiday) should instead be due on the next following Currency Business Day for GBP that is also an Exchange Business Day which is expected to be June 6th, 2022.

Deliveries due on a Settlement Date falling on any of the Rescheduled Bank Holidays should be made on the next following Clearance System Business Day, expected to be June 6th, 2022.

2 2007 European Variance Swap Master Confirmation Agreement and Revised 2007 European Variance Swap Master Confirmation Agreement⁸ (together, the “European Variance Swap MCAs”).

The following guidance is for Index Variance Swap Transactions and Share Variance Swap Transactions confirmed under the European Variance Swap MCAs.

2.1 *Scheduled Trading Day*

- In respect of Index Variance Swaps only, if “Multiple Exchange” applies, a Scheduled Trading Day is a day on which (i) the Index Sponsor is scheduled to publish the level of the Index and (ii) the Related Exchange is scheduled to be open for trading for its regular trading session. This guidance assumes that either,
 1. the Rescheduled Bank Holidays are not days on which the Index Sponsor is scheduled to publish the level of the Index; or
 2. one of the London Exchanges is a Related Exchange for the relevant Transaction and, as set out in paragraph 1.1 (*Exchange Business Days; Scheduled Trading Days*) above, the closures of the London Exchanges are scheduled.(i.e., the guidance assumes that the Rescheduled Bank Holidays are not Scheduled Trading Days for the purposes of the Multiple Exchange Index Annex because of either 1 or 2 above being satisfied).
- In respect of Share Variance Swaps under the Revised 2007 European Variance Swap Master Confirmation Agreement only, the guidance below assumes that one of the London Exchanges is the “Exchange” for the Transaction. If a London Exchange is

⁸ Including Annex IVS (*Index Variance Swap*) and the Multiple Exchange Index Annex, and Annex SVS (*Share Variance Swap*).

specified as a “Related Exchange” for the Transaction but no London Exchange is an “Exchange”, then the Rescheduled Bank Holidays will continue to be Scheduled Trading Days.⁹

2.2 N

“N” is defined in the European Variance Swap MCAs as *“The number specified as such in the relevant Transaction Supplement or, if not so specified, the number of days that, as of the Trade Date, are expected to be Scheduled Trading Days for the period from, but excluding, the Observation Start Date to, and including, the Scheduled Valuation Date”*.

Unless otherwise specified, if the Trade Date of such a Variance Swap Transaction is before the date on which the update performed by the London Stock Exchange took place (August 31st, 2021)¹⁰, N will not include the Original Bank Holiday but will include the Rescheduled Bank Holidays if such dates fall in the period from, but excluding, the Observation Start Date to, and including, the Scheduled Valuation Date.

Unless otherwise specified, if the Trade Date of such a Variance Swap Transaction is on or after the date on which the update performed by the London Stock Exchange took place (August 31st, 2021)¹¹, N will include the Original Bank Holiday but will not include the Rescheduled Bank Holidays if they fall in the period from, but excluding, the Observation Start Date to, and including, the Scheduled Valuation Date.

2.3 Observation Days (other than the Valuation Date)

Observation Days are defined in the European Variance Swap MCAs as *“Each Scheduled Trading Day during the Observation Period, whether or not such day is a Disrupted Day. Section 6.6 [(or, if “Futures Price Valuation” is applicable, Sections 6.8(a) and 6.8(e))]¹² of the Equity Definitions shall not be applicable to any Observation Day other than the Valuation Date, in which case P_t (as defined below) in respect of the Valuation Date shall be determined in accordance with the applicable Section.”*.

Observation Period is defined as *“the period from, but excluding, the Observation Start Date to, but excluding, the Observation End Date, and the Valuation Date”*. The Observation Start Date is the Trade Date (unless otherwise specified), and the Observation End Date is the Scheduled Valuation Date.

⁹ The Share Variance Swap General Terms Confirmation under the Revised 2007 European Variance Swap Master Confirmation Agreement provides that there shall be no Related Exchange for the purpose of the definition of Scheduled Trading Day.

¹⁰ Given the earlier Announcement Date of November 12th, 2020, some market participants adopting this approach may agree to treat N as not including May 30th, 2022 and as including June 2nd and 3rd 2022 (if such dates fall in the period from, but excluding, the Observation Start Date to, and including, the Scheduled Valuation Date) for the purposes of any Transaction with a Trade Date that is prior to the Announcement Date rather than prior to the date on which the schedules of the London Exchanges were updated.

¹¹ Given the earlier Announcement Date of November 12th, 2020, some market participants adopting this approach may agree to treat N as including May 30th, 2022 and as not including June 2nd and 3rd 2022 (if such dates fall in the period from, but excluding, the Observation Start Date to, and including, the Scheduled Valuation Date) for the purposes of any Transaction with a Trade Date that is on or after the Announcement Date rather than on or after the date on which the schedules of the London Exchanges were updated.

¹² Applies to Index Variance Swaps only

In order to align the number of Observation Days with “N” for the purposes of the Final Realized Volatility formula, as the definition of “N” is determined (as specified in paragraph 2.2 (*N*) above) by reference to the number of days that, as at the Trade Date, are Scheduled Trading Days in the period from, but excluding, the Observation Start Date to, and including, the Scheduled Valuation Date, parties should consider whether, as at the Trade Date, each day during the Observation Period should be treated as a Scheduled Trading Day for the purposes of determining the Observation Days. For such purposes, and unless otherwise agreed between the parties:

- (i) if the Trade Date of such a Variance Swap Transaction is before the date on which the update performed by the London Stock Exchange took place (August 31st, 2021)¹³ and:
 - (a) a day during the Observation Period falls on a Rescheduled Bank Holiday, it will be treated as a Scheduled Trading Day that is a Disrupted Day (see paragraph 1.1 (*Exchange Business Days; Scheduled Trading Days*) above), with the result that P_t for such Observation Day shall be deemed to equal P_{t-1} , and
 - (b) a day during the Observation Period falls on the Original Bank Holiday, it will not be an Observation Day; and
- (ii) if the Trade Date of such a Variance Swap Transaction is on or after the date on which the update performed by the London Stock Exchange took place (August 31st, 2021)¹⁴ and:
 - (a) a day during the Observation Period falls on a Rescheduled Bank Holiday, it will not be an Observation Day, and
 - (b) a day during the Observation Period falls on the Original Bank Holiday, it will be an Observation Day.

2.4 Valuation Date

If the Observation End Date (i.e. the Valuation Date) falls on any of the Rescheduled Bank Holidays, the Valuation Date will be adjusted to instead be the next Scheduled Trading Day (which is expected to be June 6th, 2022).

If the parties have agreed to treat the Rescheduled Bank Holidays as non-Scheduled Trading Days, the Observation End Date (i.e. the Valuation Date) will be adjusted in accordance with Section 6.6 of the 2002 Equity Definitions (i.e. it will move to the next following Scheduled Trading Day that is not a Disrupted Day) and P_t in respect of such Observation End Date will be determined on such adjusted Valuation Date.

If Futures Price Valuation is applicable and the Valuation Date falls on any of the Rescheduled Bank Holidays and the Official Settlement Price is not published on such date, the Valuation

¹³ Given the earlier Announcement Date of November 12th, 2020, some market participants adopting this approach may agree to evaluate Observation Days for the purposes of any Transaction with a Trade Date that is prior to the Announcement Date rather than prior to the date on which the schedules of the London Exchanges were updated.

¹⁴ See footnote 13.

Date will be postponed and will be the first succeeding Scheduled Trading Day on which the Official Settlement Price is published (which is expected to be June 6th, 2022).

2.5 Payment

The Cash Settlement Payment Date falls the specified number of Currency Business Days after the Valuation Date. Unless otherwise specified, if the Valuation Date falls on any of the Rescheduled Bank Holidays, the Cash Settlement Payment Date will be moved to two Currency Business Days after the adjusted Valuation Date (expected to be June 6th, 2022).

3 2007 European Master Equity Derivatives Confirmation Agreement¹⁵

The guidance set out in paragraph 1 above should be equally applicable to Transactions documented under the 2007 European Master Equity Derivatives Confirmation Agreement (and the Annexes attached to it). However, in addition, the following points should be noted:

3.1 Multiple Exchange Index Annex: With respect to any Index Transaction, if the “Multiple Exchange Index Annex” applies, a Scheduled Trading Day is a day on which (i) the Index Sponsor is scheduled to publish the level of the Index and (ii) the Related Exchange is scheduled to be open for trading for its regular trading session. This guidance assumes that either,

1. the Rescheduled Bank Holidays are not days on which the Index Sponsor is scheduled to publish the level of the Index; or
2. one of the London Exchanges is a Related Exchange for the relevant Transaction and, as set out in paragraph 1.1 (*Exchange Business Days; Scheduled Trading Days*) above, the closures of the London Exchanges are scheduled.

(i.e., the guidance assumes that the Rescheduled Bank Holidays are not Scheduled Trading Days for the purposes of the Multiple Exchange Index Annex because of either 1 or 2 above being satisfied).

3.2 Component Security Index Annex: With respect to any Index Swap under Annex IS to which the Component Security Index Annex applies,¹⁶ a Scheduled Trading Day is a day on which the Index Sponsor is scheduled to publish the level of the Index. Accordingly, the guidance above in paragraph 1.3 (*Valuation of Options, Swaps and Forwards*) only applies if the Rescheduled Bank Holidays are not days on which the Index Sponsor is scheduled to publish the level of the Index.

3.3 Forward starting transactions: In respect of an Index/Share Option Transaction or an Index Swap, where the Transaction is forward starting and a Strike Date is specified in the Transaction Supplement, if the Strike Date falls on any of the Rescheduled Bank Holidays and such days are not Scheduled Trading Days (as to which, see paragraph 3.1 (*Multiple Exchange Index Annex*) and 3.2 (*Component Security Index Annex*) above in respect of Index

¹⁵ Including Annex ISO (Cash/Physically-Settled Index/Share Option), Annex EFS (Cash-settled Equity Finance Share Swap), Annex IS (Cash-settled Index Swap) and the Multiple Exchange Index Annex.

¹⁶ The Component Security Index Annex applies by default unless disapplied in the Transaction Supplement.

Transactions) it should be moved to the next following Scheduled Trading Day (which is expected to be June 6th, 2022).

3.4 Cash Settlement Payment Date:

- In respect of an Index or Share Option Transaction, the Cash Settlement Payment Date falls two Currency Business Days after each Valuation Date and in respect of an Index Transaction, the specified number of Currency Business Days following the relevant Valuation Date. If a Valuation Date falls on any of the Rescheduled Bank Holidays, the Cash Settlement Payment Date will be moved to two, or the specified number (as applicable), Currency Business Days after the adjusted Valuation Date (the adjusted Valuation Date is expected to be June 6th, 2022).
- In respect of an Equity Finance Share Swap Transaction, the Cash Settlement Payment Date falls one Settlement Cycle after the Valuation Date (or if that date is not a Currency Business Day, the next Currency Business Day). If the Valuation Date falls on any of the Rescheduled Bank Holidays, the Cash Settlement Payment Date will be moved to one Settlement Cycle after the adjusted Valuation Date (the adjusted Valuation Date is expected to be June 6th, 2022).

4 2009 European Interdealer Master Equity Derivatives Confirmation Agreement¹⁷

The guidance set out in paragraph 1 above should be equally applicable to Transactions documented under the 2009 European Interdealer Master Equity Derivatives Confirmation Agreement (and the Annexes attached to it). However, in addition, the following points should be noted:

4.1 Interdealer Index Swap (Annex IIS):

- *Scheduled Trading Day:* In respect of any Index Swap under Annex IIS (Cash Settled Interdealer Index Swap) for which “Component Security Price” is not specified to apply, a Scheduled Trading Day is a day on which the Index Sponsor is scheduled to publish the level of the Index. Accordingly, the guidance above applies if the Rescheduled Bank Holidays are not days on which the Index Sponsor is scheduled to publish the level of the Index.
- *Component Security Scheduled Trading Day:* In respect of any Index Swap under Annex IIS (Cash Settled Interdealer Index Swap) for which “Component Security Price” is specified to apply, a Scheduled Trading Day is determined individually for each Component Security based on the relevant Exchange for such Component Security. If some (but not all) of the Component Securities are listed on a London Exchange and the Valuation Date or (for forward starting transactions and in respect of the Initial Price), the Strike Date falls on any of the Rescheduled Bank Holidays, the Valuation Date for such Component Securities only will be postponed to the next Scheduled Trading Day for such Component Securities (expected to be June 6th, 2022). For any Component Securities for which the relevant Exchange is not a London Exchange, the

¹⁷ Including Annex FVSS (Fair Value Share Swap General Terms Confirmation), Annex IIS (Index Swap General Terms Confirmation), and Annex SS, Share Swap General Terms Confirmation).

price for such Component Securities will be determined on the Valuation Date or (for forward starting transactions and in respect of the Initial Price) the Strike Date that falls on any of the Rescheduled Bank Holidays.

- 4.2 *Forward starting transactions:*** Where the Transaction specifies “Forward Starting” in the Transaction Supplement for the Initial Price, the Strike Date shall be treated as a Valuation Date for the purposes of the Equity Definitions. Therefore, if the Strike Date falls on any of the Rescheduled Bank Holidays it should instead be the next following Scheduled Trading Day (which is expected to be June 6th, 2022).
- 4.3 *Effective Date:*** In respect of a Transaction under Annex FVSS (Cash-settled Fair Value Share Swap) or Annex IIS (Cash-settled Interdealer Index Swap), if the Strike Date is adjusted, the Effective Date may also be adjusted accordingly.

5 2011 ISDA Equity Definitions – Index Volatility Swaps

The following guidance is for equity derivative transactions confirmed under the Equity Matrix for Index Volatility Swaps (General Terms Confirmation, Definitions, and Terms Supplement) where the terms defined in such Equity Matrix are sourced from the 2011 ISDA Equity Derivatives Definitions (“**Index Volatility Transactions**”).

5.1 *Scheduled Trading Day*

For such Index Volatility Transactions, a Scheduled Trading Day is a day that is both a scheduled Exchange Business Day (determined as of the Trade Date) and a day on which the Index Sponsor is scheduled to publish a value for the Index (determined as of the Trade Date). As such, where the relevant Exchange is the London Stock Exchange, if the Trade Date of the relevant Transaction is before the date on which the London Stock Exchange updated their trading calendar (August 31st, 2021)¹⁸, the Rescheduled Bank Holidays should be deemed to be Scheduled Trading Days.

¹⁸ Given the earlier Announcement Date of November 12th, 2020, some market participants adopting this approach may agree to treat June 2nd and 3rd, 2022 as Scheduled Trading Days for the purposes of any Transaction with a Trade Date that is prior to the Announcement Date rather than prior to the date on which the schedules of the London Exchanges were updated.
