Basel II, Basel III Orientation

Understanding the Evolution of bank capital regulation FinanceTrainingCourse.com









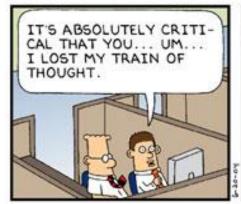










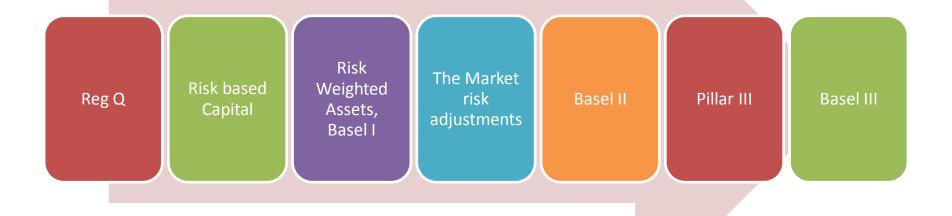








Regulation











Regulation











Capital









Capital Attribution









Core Issue

Capital Allocation

Basis



Policy

- Process
- Distribution
- Appetite



Board and Management

- Involvement
- Awareness



Regulator

- Tracking indicators
- Intervention

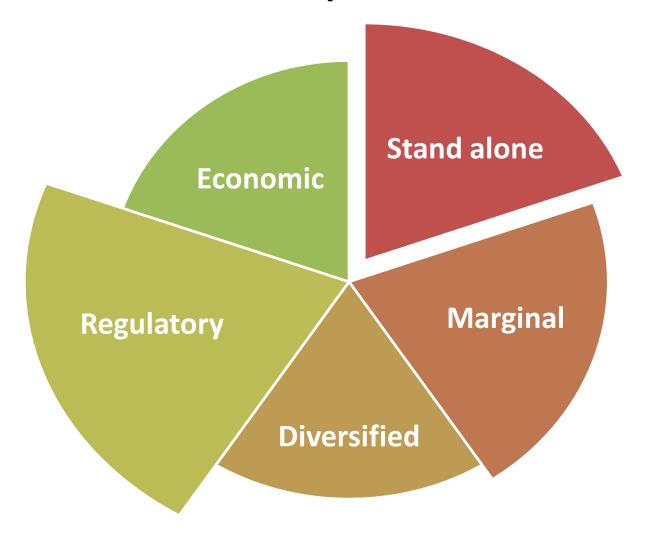








Capital



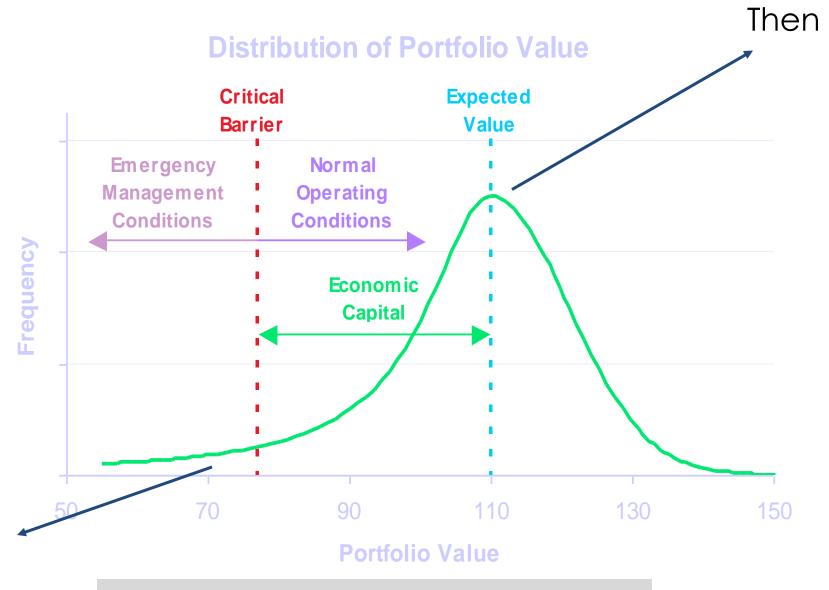








Capital & Distribution





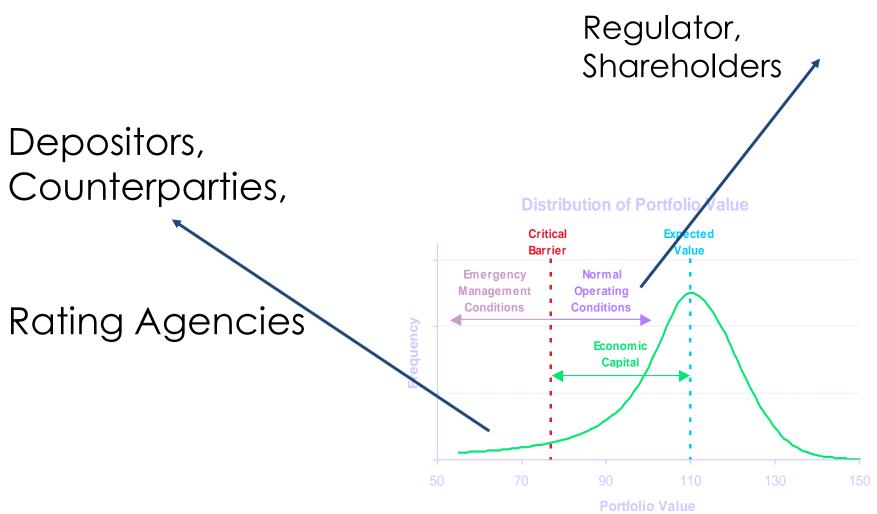
Now







Capital & Distribution











Implementation

- Which capital?
 - regulatory or economic or both
- Calculation engine
 - Data
 - Assumptions
 - Correlation
- Application
 - RAROC or not?

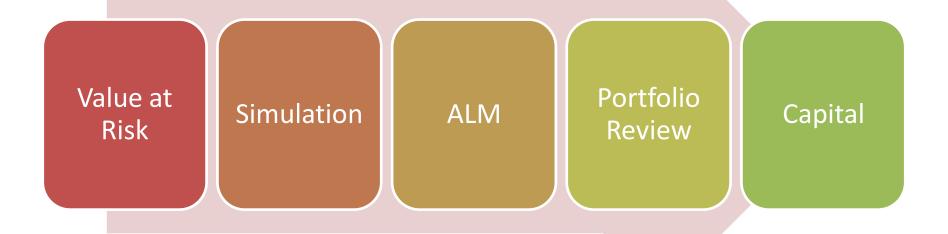








ICAAP - Framework



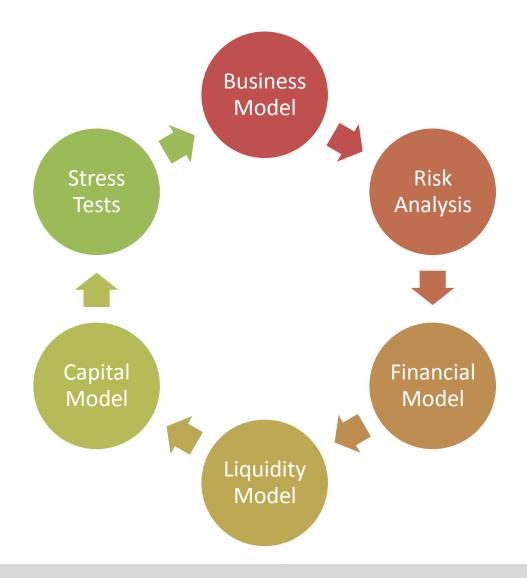








ICAAP Report Structure











Challenges

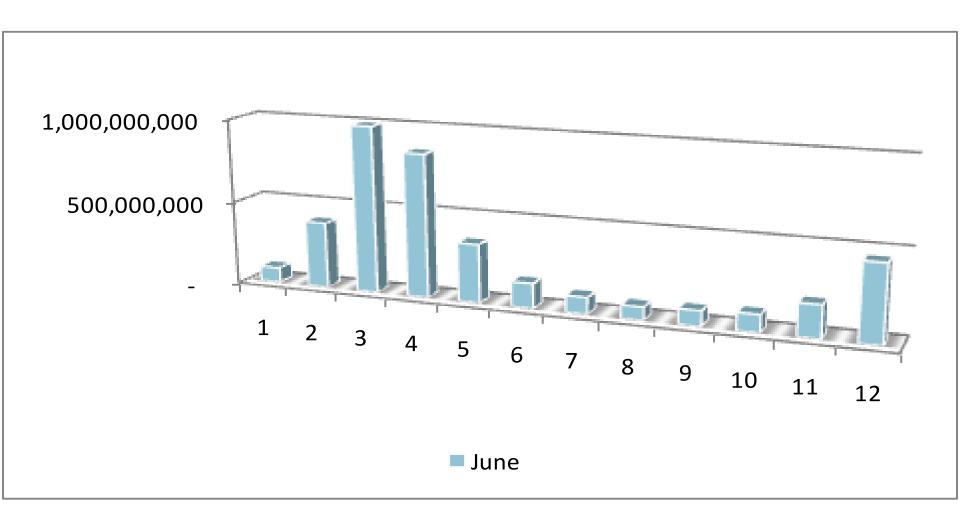








The distribution



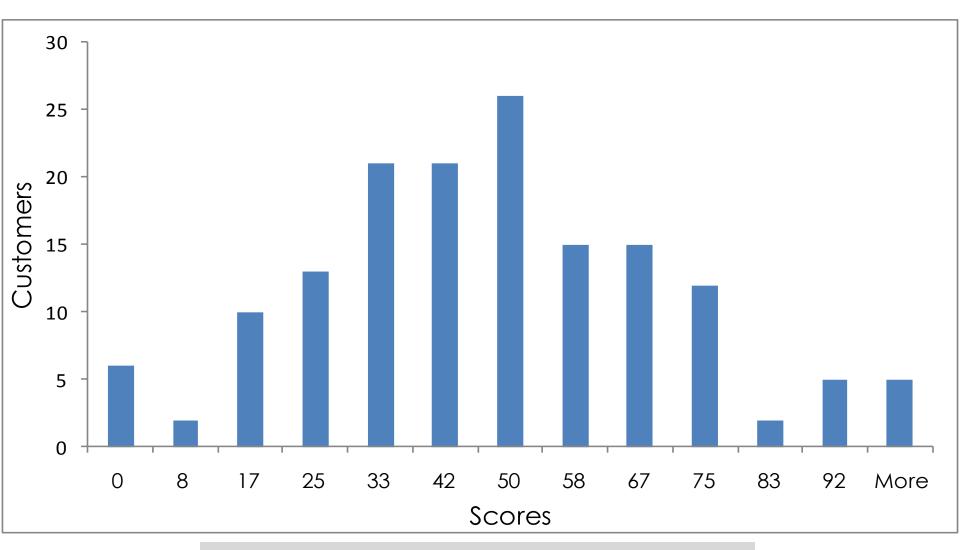








Effectiveness



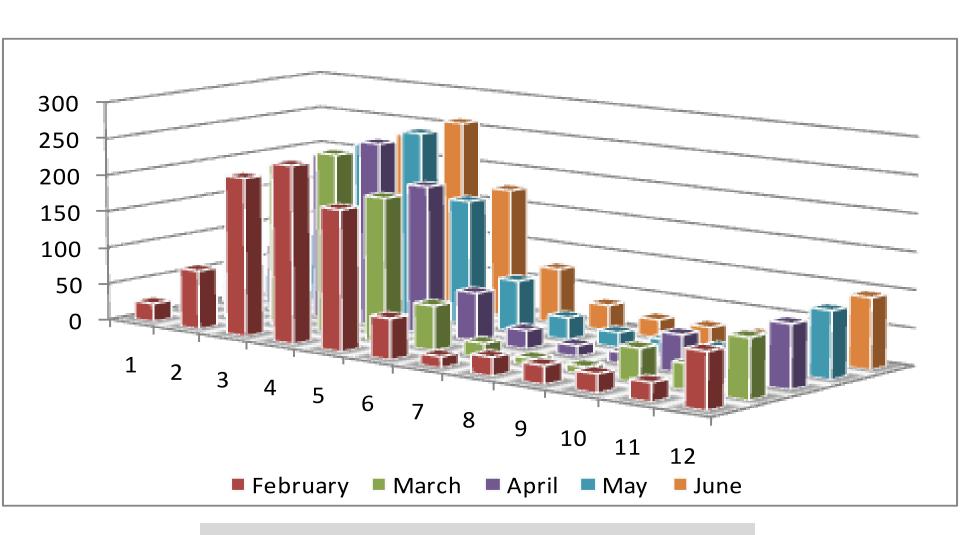








Behaviour



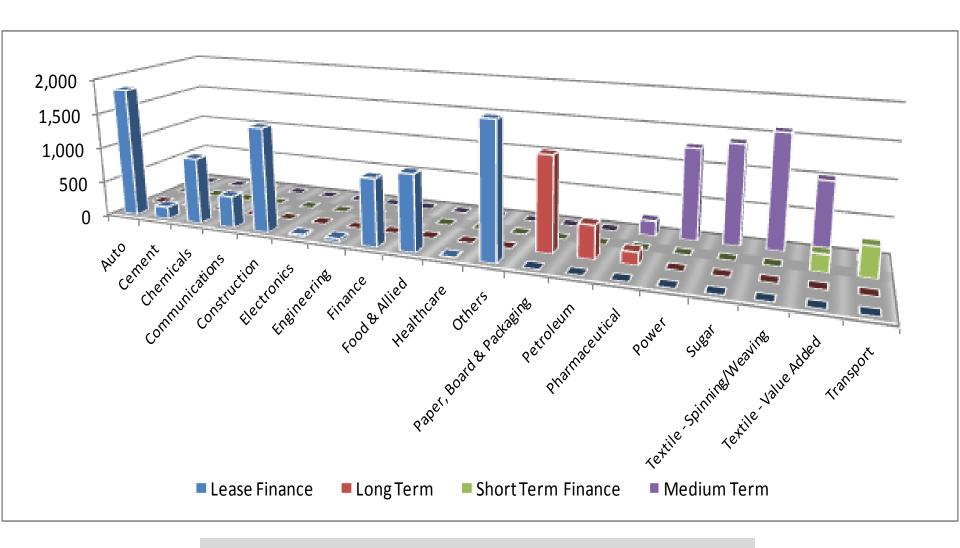








Dissection











Issues









Policy

- Group structure
- Responsibility
- Process
 - Capital attribution
 - Risk Appetite
- Distribution List, Frequency
- Content









Capital = ?

- Credit risk
- Market risk
- Operation Risk
- Interest rate gap ?
- Liquidity risk ?
- Concentration ?
- For strategic risk ?
- For other residual risks ?









Capital = Regulatory

- Credit risk → Standardized or IRB
- Market risk

 Standardized or IMA
- Operation Risk → Basic Indicator









Capital = Regulatory

- Interest rate gap nil
- Liquidity risk nil
- Concentration nil
- For strategic risk nil
- For other residual risks nil









Capital = Economic

- Credit risk → Earnings at Risk
- Market risk → IMA
- Operation Risk → Basic Indicator









Capital = Economic

- Interest rate gap Earnings at Risk
- Liquidity risk Exposure based
- Concentration add on charge
- For strategic risk scenario based
- For other residual risks nil









Aggregation

- Additive
- Impact of correlation
- Across related areas
- Across unrelated areas
- Modeling correlation
- Top down approach
- Bottom up approach









Value addition

- Economic capital
- Loan pricing
- Risk Adjusted Return on Capital
- Transfer Pricing
- Risk appetite
- Risk is half the equation









Anatomy of a liquidity crisis Basel III Adjustments









Name Crisis

Change in market conditions

Operational Loss

Asset related Loss Regulatory scandal

Accounting Scandal

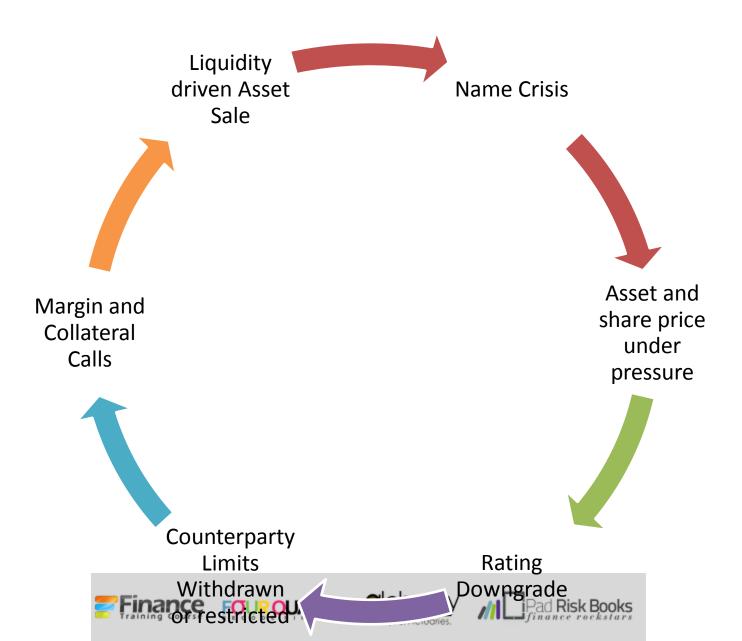




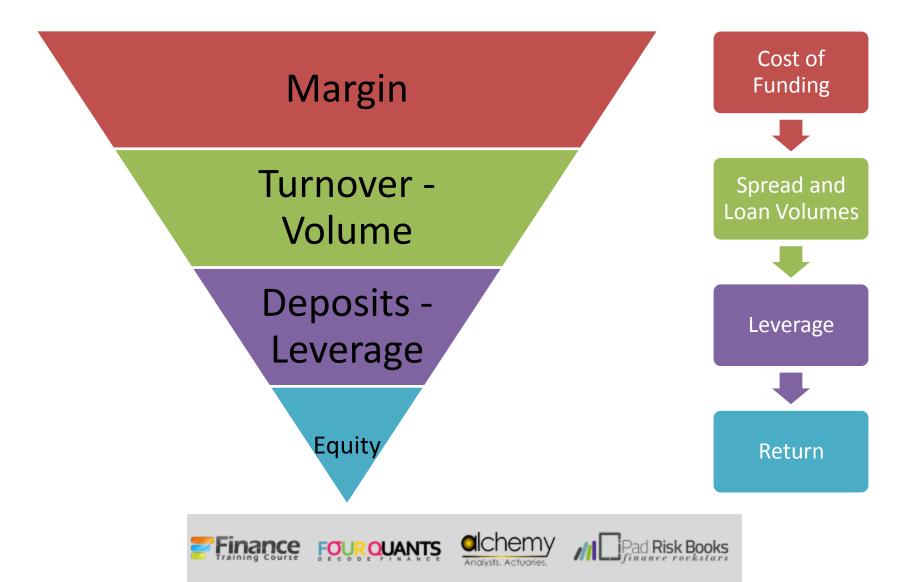




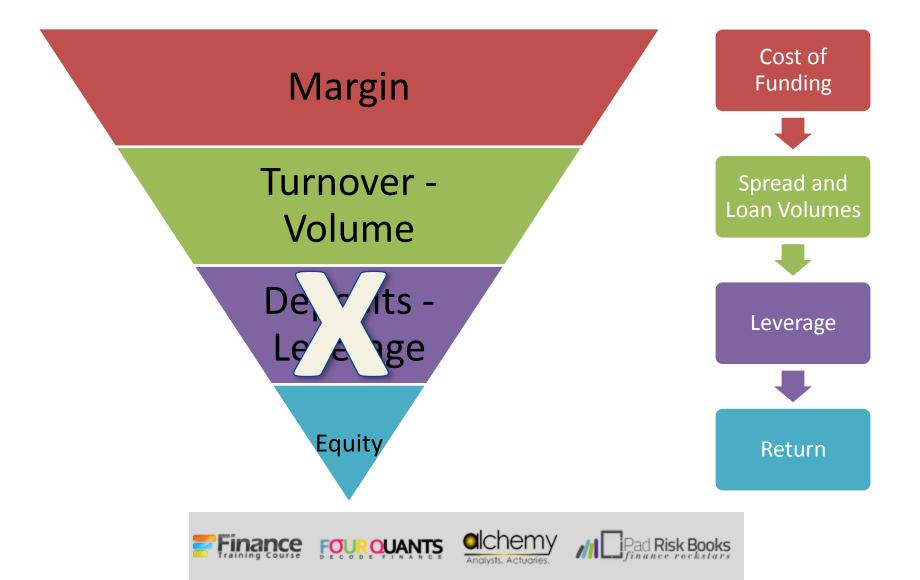
Liquidity Crisis



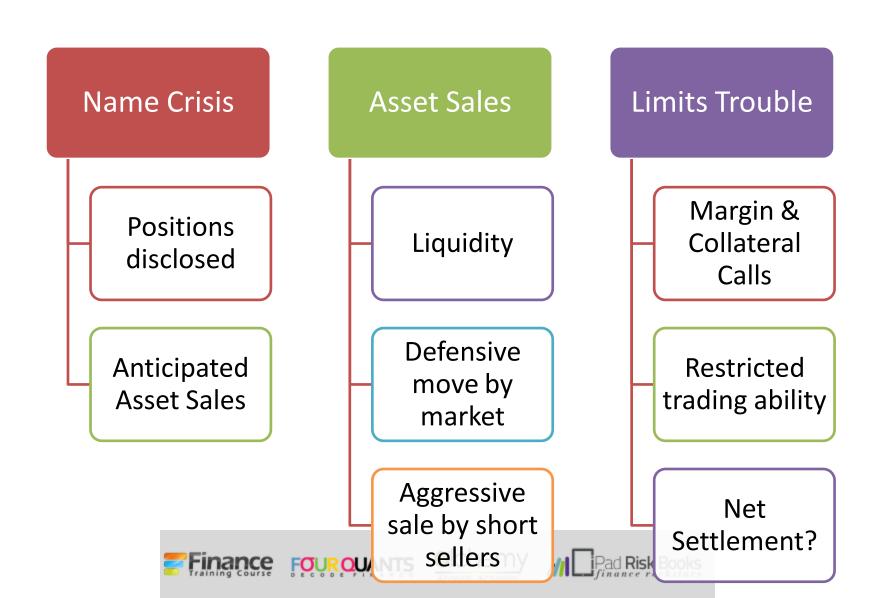
Financial Inst. Business Model



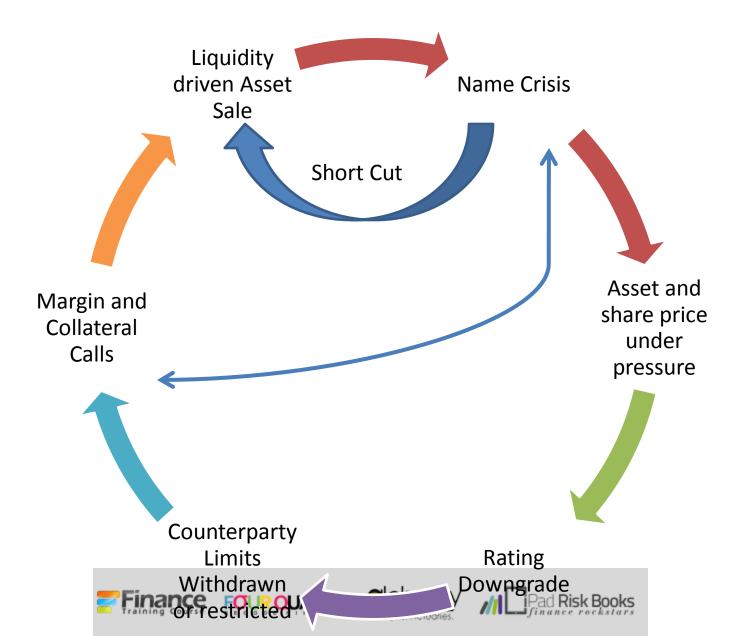
FI Business Model



Asset Sales



Liquidity Crisis



Cash Generation

Asset Sales

- Repurchase agreements
- Discount window
- Outright sale at depressed prices
- Off market settlement for netting off liabilities

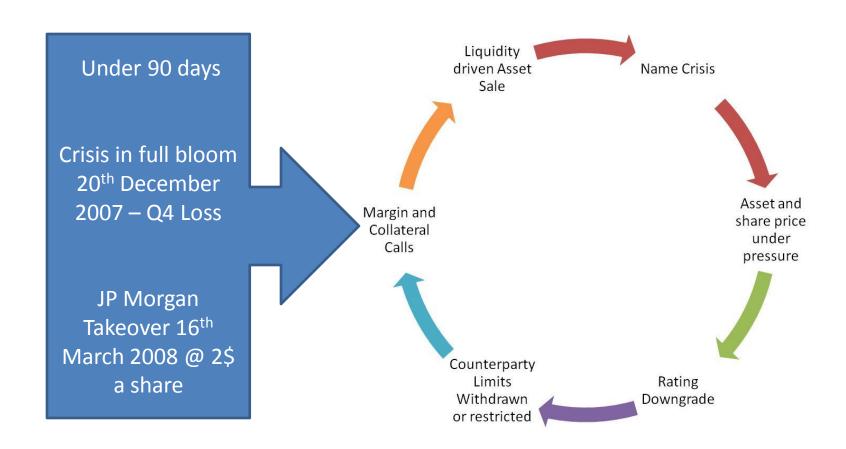
Cash Generation

- Secured Term loans
- Equity Injection
- Asset Swap for Cash
- Regulatory driven cash injection or take over

Cash conservation

- Realignment and restructuring of resources
- Discontinued operations
- Limit management
- Centralization of cash management

Bear Stearns





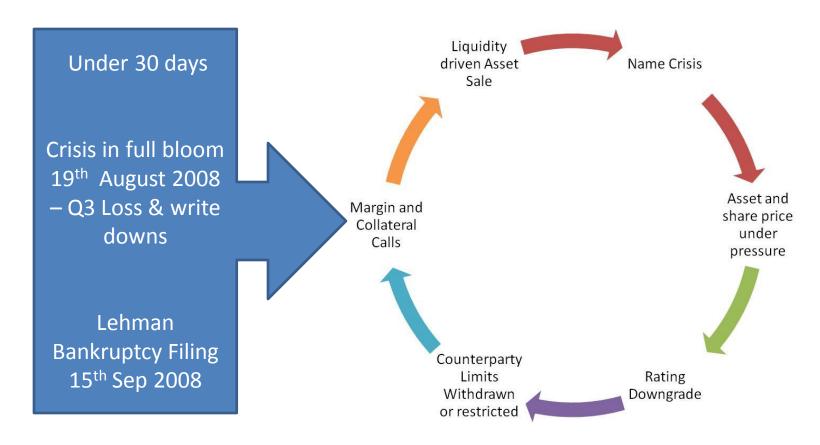






Lehman

9th June: \$45 billion in liquidity, 20% reduction risky assets, leverage from 31:1 to 25:1. Survived March Bear fallout. Raised US\$ 10 billion through capital issues in April/June











Bear Stearns Case Study

20 December 2007: BS records 4th quarter loss, writes down mortgage assets of \$1.9 billion. Sued by Barclays

28 December 2007: Employees sell BS stock worth \$ 20 million

Early January 2008: CEO James Cayne resigns. Moody's downgrade of MBS tranches issued by BS

Mid-January 2008: Over 20% fall in BS share price

- 7 March 2008: Shares of Carlyle Capital Corporation (CCC) (BS has significant exposure), suspended. Triggers concerns regarding liquidity
- **10 March 2008**: BS Press Release to reassure investors that liquidity concerns are false. Rumors of loss of confidence and credit facilities.
- 11 March 2008: CFO says rumors false. Goldman Sach's says it will not stand in for it clients for derivative deals with BS
- **12 March 2008**: CEO says no liquidity crisis on CNBC, quarter will show profit. Banks withdraw credit lines, clients stop using BS brokerage
- **13 March 2008**: CCC hedge fund collapses. BS share price falls 17%. CEO announces all is well. Liquidity falls from \$17 billion to \$2 billion.
- **13 March 2008:** CEO approaches JP Morgan for rescue package and clients to express confidence in BS publicly. Latter declined.
- **14 March 2008**: BS says JP Morgan with Fed Reserve has agreed to provide funding. Share price falls 40%. S&P and Moody's cut BS ratings
- 16 March 2008: JP Morgan announces that they have acquired BS for \$2 per share









Lehman Case Study

- **13**th **March 2007**: Stock market suffers largest one-day drop in 5 years on reports that Lehman's profitability would be significantly impacted because of rising subprime mortgage delinquencies.
- 14th March 2007: Lehman reports record revenues and profits for its first fiscal quarter.
- August 2007: Announces closing of subprime mortgage originator BNC Mortgage cutting 1200 jobs. Also closes down offices of Alt-A originator offices in a number of states.
- **13**th **December 2007**: Reports record net income for the year of \$4.2 billion and revenue of \$19.3 billion.
- 17th January 2008: Stops originating mortgages through its wholesale channels.
- 17th March 2008: Share price declines sharply by more than 48% following the collapse of Bear Stearns
- **18**th **March 2008**: Reports better than expected reported profits for the first fiscal quarter. Share prices rise to recover value lost the previous day.
- 1st April 2008: Announces that it has raised \$4 billion in preferred stock.
- **15**th **April 2008**: Lehman's CEO Richard Fuld tells investors that worst of credit crisis is over but financial environment would remain challenging.









Lehman – Cont.

- **9**th **June 2008**: Lehman announces first quarterly loss of \$3 billion since becoming a public company. Also announces sale of \$6billion in stock to raise capital, an increased liquidity position of \$45 billion, a 20% reduction in residential and commercial mortgages exposure and a reduced leverage ratio of 25 to 1.
- 19th August 2008: Share price falls by 13% on reports that 3-quarter results would be impacted by significant asset write downs
- **22**nd **August 2008:** Stock price recovers on negotiations with state-controlled Korean Development Bank.
- 2nd September 2008: New reports indicate that KDB would purchase a 25% stake in Lehman.
- 8th September 2008: Lehman's share price falls sharply on reports that KDB talks are on hold.
- 9th September 2008: New reports indicate talks with KDB have ended. Lehman's share price falls by 45%. Liquidity drys up as hedge fund clients start pulling out, lines of credit are withdrawn, calls for more margin/ collateral increase and trades with Lehman are cancelled.
- **10**th **September 2008**: Lehman reports third quarter results, a loss of \$3.2 billion with asset write-downs amounting to \$5.6 billion. Stock price declines by 7%. Moody's announces potential credit ratings downgrade.
- 11 12th September 2008: Lehman's stock declines a further 42% as it struggles to find a buyer. BofA and Barclays comes forward.
- 13th 14th September 2008: Bids by both parties end as US government insists that it will not provide assistance.
- 15th September 2008: Lehman files for bankruptcy protection. Dow Jones suffers its largest drop since 11th September 2001.









Group Assignment

The Libor Crisis and Probability of Default for LIBOR Banks

Due Wednesday 10 am









The Usual Suspects

ine Usuai Suspects		
	Market Cap / Equity	Pretax Income
Submitting Bank	Base (USD Billions)	(USD Billions)
Bank of America	230	1
JP Morgan Chase	184	19
HSBC	136	22
The Royal Bank of		
Scotland Group	116	(1)
Bank of Tokyo-		
Mitsubishi UFJ Ltd	108	7
Barclays Bank plc	101	9
Citibank NA	77	11
Lloyds Banking		
Group	72	4
Deutsche Bank AG	69	6
Royal Bank of		
Canada	69	7
Credit Agricole CIB	64	(2)
Société Générale	61	3
Rabobank	58	4
UBS AG	57	4
The Norinchukin		
Bank	53	2
BNP Paribas	48	8
Credit Suisse	32	29
Sumitomo Mitsui		
Banking		
Corporation Europe		
Ltd (SMBCE)	2 Einange - 2	alchemy .P
Source: Public Data. Compiled by FinanceTrainingCourse.com		

Assignment – 48 hours

- Estimate trailing PD's using the structured approach for the following 6 banks
- Barclays
- BAML
- HSBC
- JP Morgan Chase
- Royal Bank of Canada
- RaboBank









Need

- Trailing Volatility estimates for last 2 years for the 6 banks
- Total Assets, Total Equity, Total Liability
- Due date. Wednesday 10 am
- Calculate Prob. Of Default using
- Structured Approach









BASEL III – LIQUIDITY RISK FRAMEWORK









Basel III reforms

Minimum liquidity risk standards

Liquidity Coverage Ratio (LCR) Net Stable Funding Ratio (NSFR)

30 days

12 months

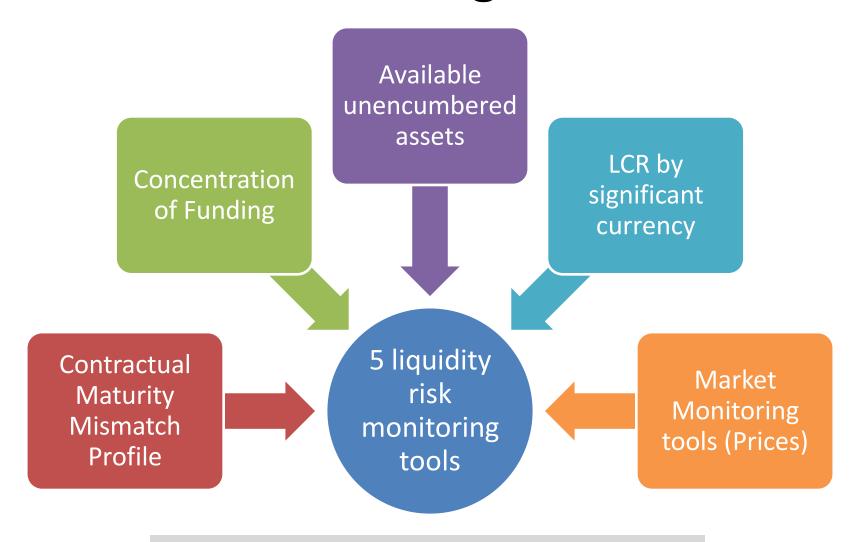








Monitoring tools



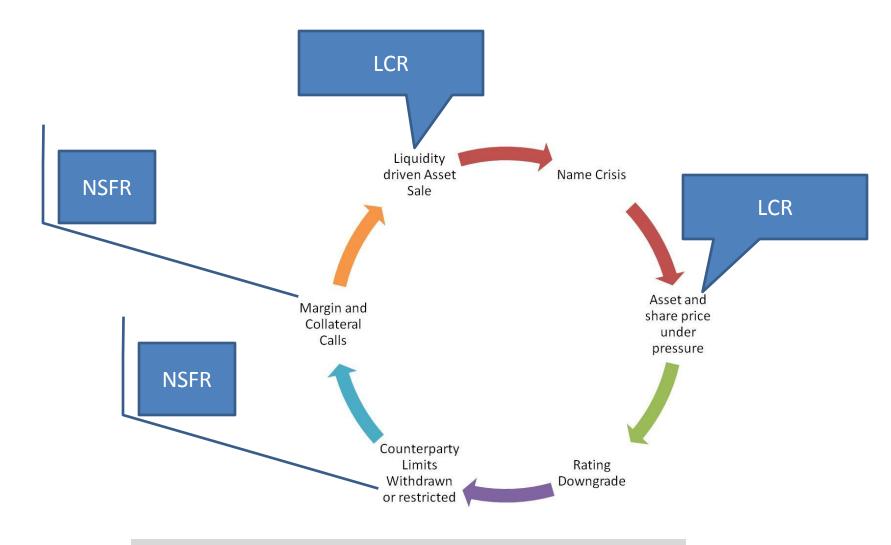








Basel III - Liquidity Framework



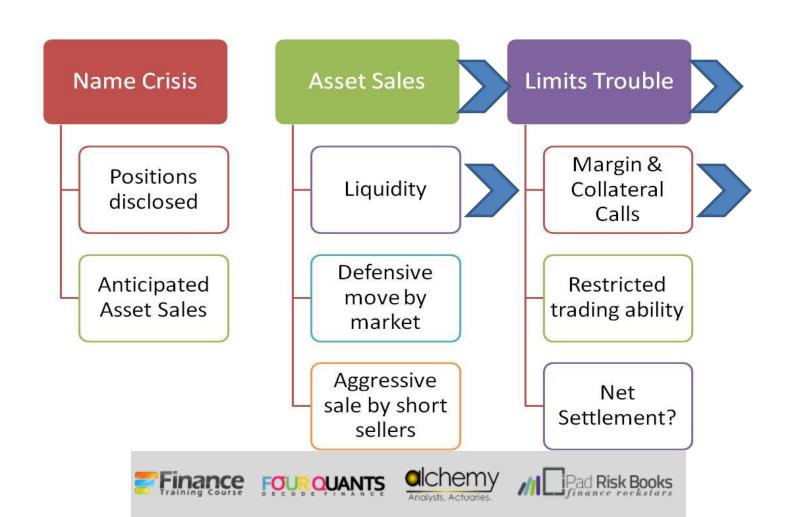








Basel III – Liquidity Framework



LCR Summary

LCR = Value of stock of high-quality liquid assets in stressed conditions / Total net cash outflows ≥ 100%

Implementation date - 2015

Inventory of liquid assets

30 calendar day severe liquidity stress

Supervisory stress testing









NSFR Summary

NSFR = Available amount of stable funding/ Required Amount of stable funding≥ 100%

Effective 2018

Longer term liquidity risk profile

1 year horizon under conditions of extended firmspecific stress

Short term structural funding liquidity mismatches









Metrics - Summary

Contractual maturity mismatch

Maturity gaps for each maturity time band

Concentration of funding

 Whole sale funding concentration by significant counterparty, product/instrument/currency

Available unencumbered assets

• By amount, currency, type, location

LCR by significant currency



Market-related monitoring tools

IMPACT ASSESSMENT

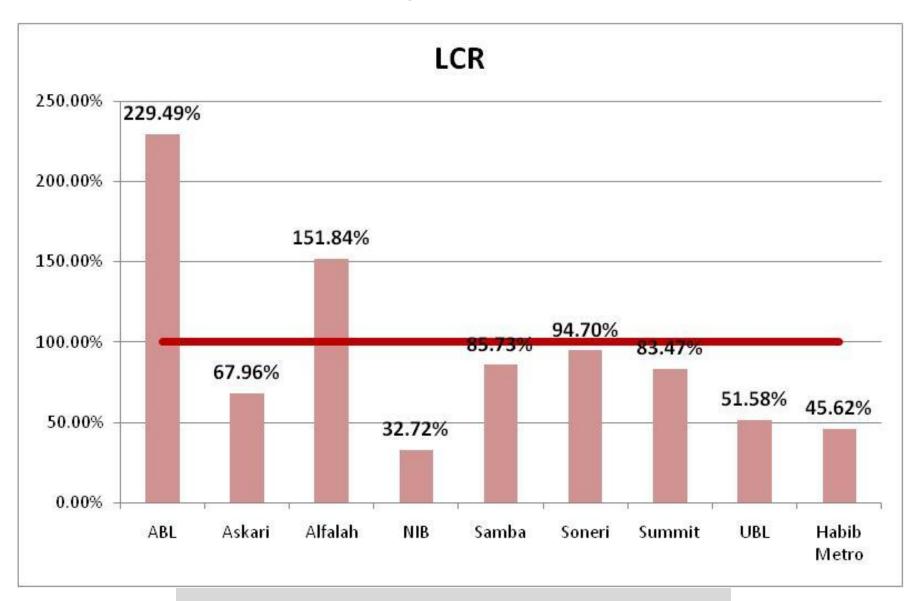




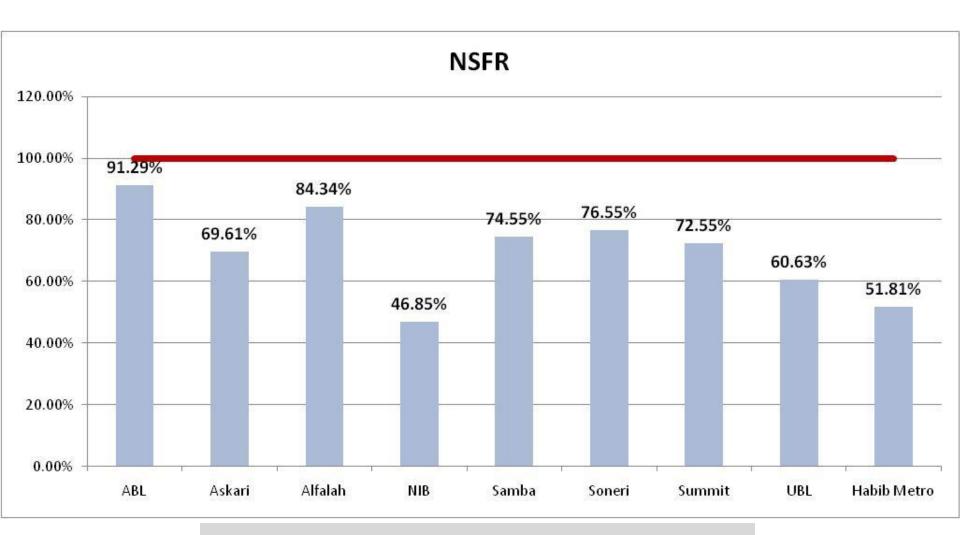




Sample LCR's



Sample NSFR



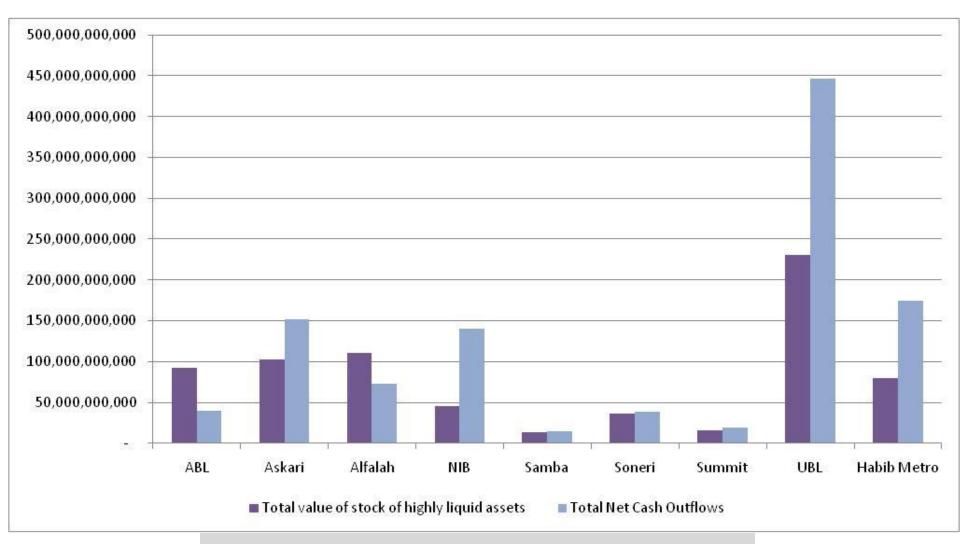








Liquid Stock / MCCO



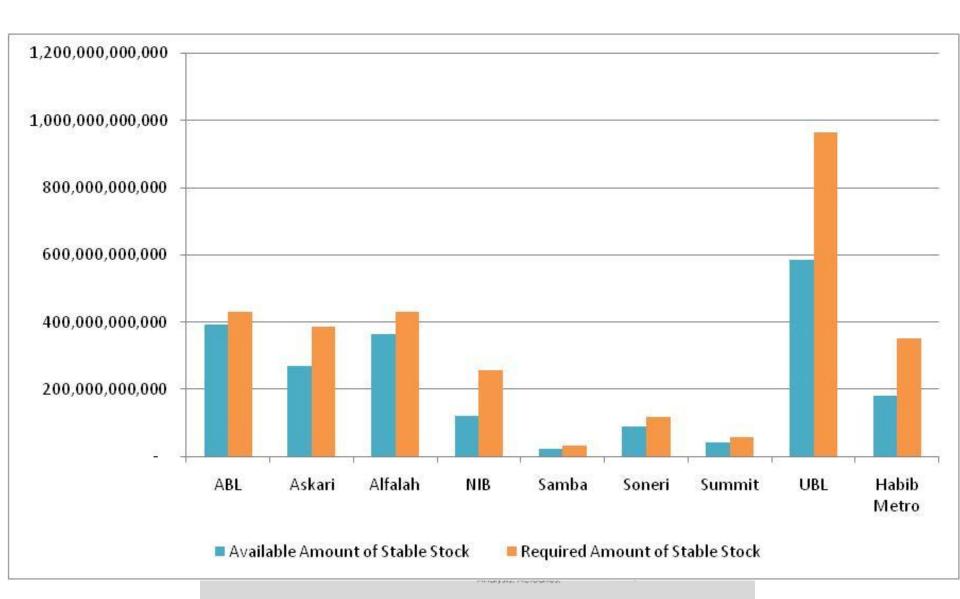




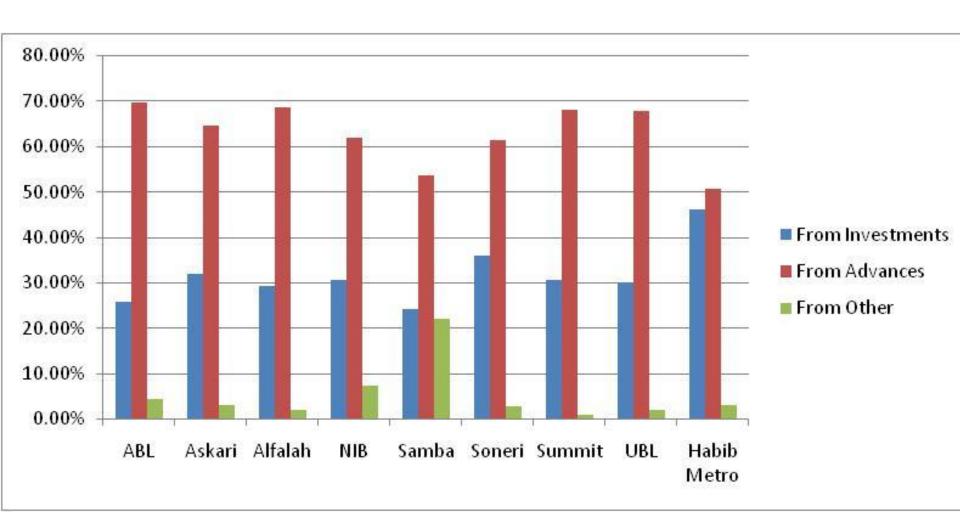




Stable funding/Required Funding



Breakdown of Gross Int. Inc.



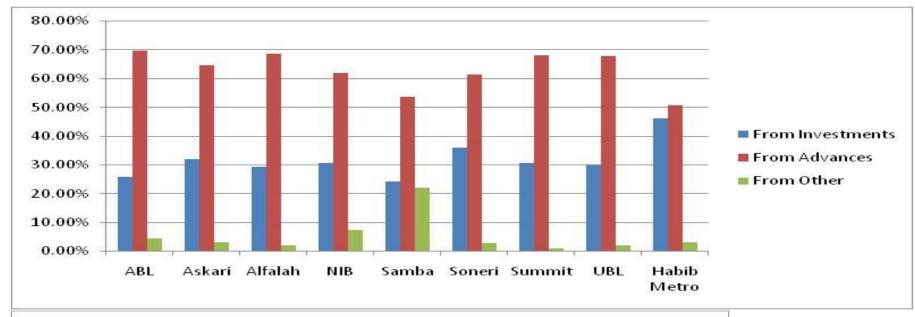


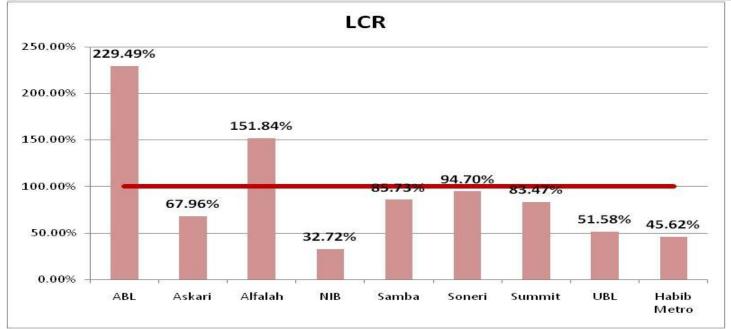




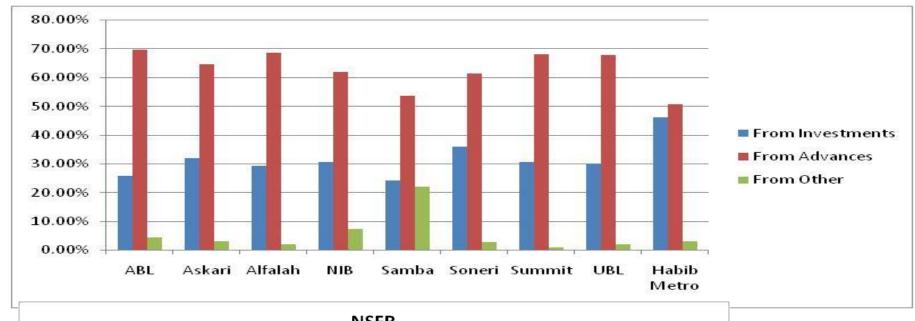


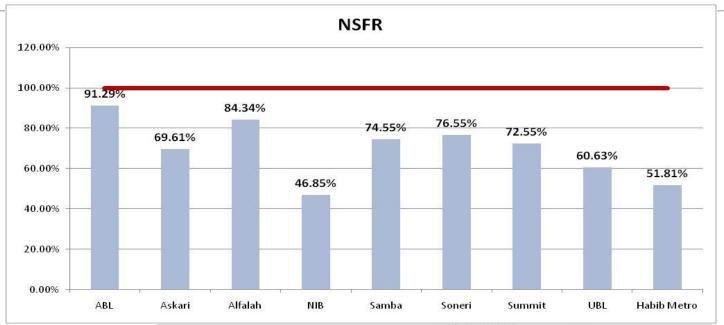
Side by side comparison





Side by side comparison





Conclusion

LCR

- High interest, low growth scenario
- Implementation? Relative basis?
- 2015 is/should be quite doable
- Possibly push sooner
- Reservations?

NSFR

- Hitting the core business model
- Significant resistance
- Alternate liquidity and funding instruments?
- -2018?









Basel II – Technology

09 Sep 2005









Expectations

- Process
 - Questions from the audience
 - Answers from the panel









Vendor Challenges

- The skill set & expertise challenge
- The political challenge
- The system & technology challenge
- The interpretation challenge









The skill set and expertise challenge

- Just Statistics & Modeling
- 2. Just Finance
- Just Banking (traditional, core, non-core)
- 4. Just Change management
- 5. Just Regulation
- 6. Certification bookish knowledge versus experience or intuition









The system & tech challenge

- 1. What was the price again?
- 2. When did you say you could implement this solution?
- 3. Competition?
- 4. Moving specs & Ongoing development
- 5. Part consulting, Part implementation, Part trouble shooting
- 6. Data set integrity
- 7. Number validation
- 8. Profile & Visibility









System & Tech challenges

- The stages
- Discovery & Analysis 3 6 months
- Business Case 8 12 weeks
- Change management On going
- Product mapping 4 8 weeks
- Data Interface 6 8 weeks
- System configuration 8 weeks
- Pre live run 6 12weeks
- Live









System & Tech challenges

- Team structure
 - Domain expert
 - Basel expertise
 - Number validtor
 - Banking / Regulatory requirements
 - Development team
 - Client Partner / Account Manager
 - Implementation team
 - Quality Assurance









The political challenge

- 1. The business case challenge
- 2. Treasury Operations
- 3. Credit Risk Management
- 4. Firm wide Risk
- New blood versus old team
- 6. Board interaction
- 7. Board responsibility
- 8. Reporting time frames, lines & mandate









The political challenge

- 1. Data ownership?
- Regulatory Compliance or Risk Management?
- 3. Whose neck is it anyways?
- 4. Is it a step up or step down?









The interpretation challenge - II

- 1. How do I put them to work?
- 2. How much is enough?
- 3. How much is acceptable?
- 4. How do I explain these to my board?
- 5. Where do we go from here?
- 6. What is the worst that can happen?
- 7. What if I breach the numbers?









The interpretation challenge - I

- 1. What do the numbers mean?
- 2. Value at Risk?
- 3. Volatility?
- 4. Monte Carlo simulation?
- 5. Capital Adequacy?

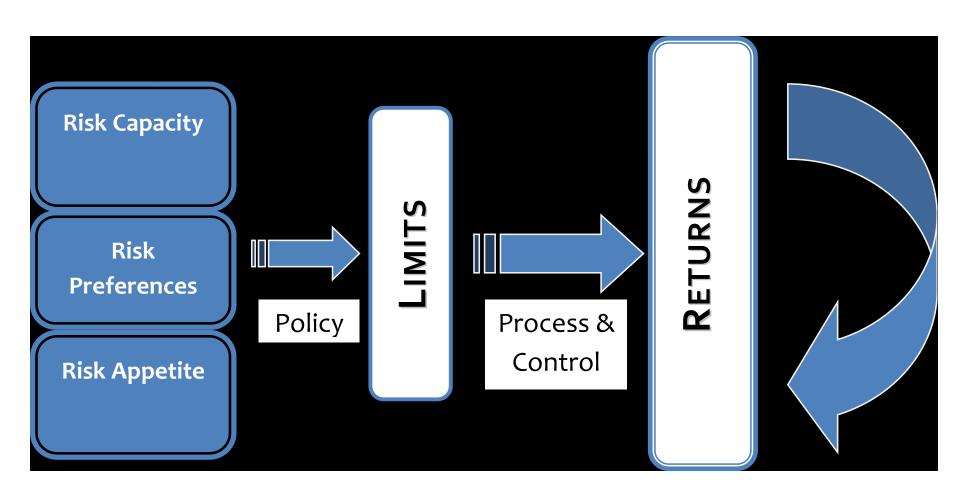








Framework











Game Plan

- Anatomy of a Liquidity Crisis
- The Basel III Liquidity adjustments
 - Framework
- Impact and implications
 - Liquidity
 - Profitability
 - Stress Testing









PD Models









Overview of PD Models

- 1. KMV Market Price Model / Merton Model
- 2. Z Score driven PD Application Score
- 3. Credit Spread driven Loss Norms
- 4. Provisions Data based Loss Norms
- 5. Payment Behavior Cohort or Mortality Model









Overview of PD Models

- KMV Market Price Model (limited application)
- 2. Z Score driven PD (data set specific)
- Credit Spread driven Loss Norms (not PD)
- 4. Market Data based Loss Norms (not PD)
- 5. Payment Behavior Cohort or Mortality Model









Approach









Process

Data set

(selection)

Rescore

(standard)

Pool

(bucket)

Behavior

(Default event)

Results / Test

(Robustness)

Report

(Results)









Key Terms

- Credit Update
- Credit Event
- Probability of Default (PD)
- Internal PD
- Regulatory PD
- Credit Score
- Scoring Engine
- Feedback Loop









Key Concepts

Probability of Default

```
P (Default) = Amount Outstanding for Credit Events
Amount Outstanding for All Updates
```

P (Default) = Number of Credit Events Number of Updates

- Credit Event / Credit Updates
- Scoring Engine ←→ PD
- Repayment data by product

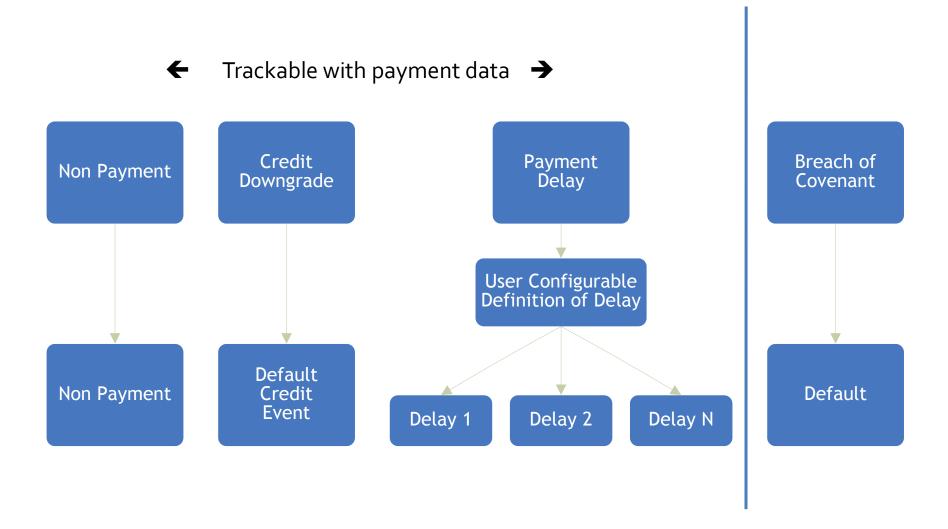








Default / Credit Event











PD 1.0

Credit	Events													
Aggregat		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Total
Ran	_	Ų١	_	_	_	_	_	-	_	_	_	-	QIZ	
90	100	-	2	2	1	1	1	3	6	3	2	2	1	24
80	90	-	3	5	2	2	2	3	3	3	4	4	5	36
70	80	-	7	3	4	4	5	3	2	3	2	3	4	40
60	70	-	5	5	6	5	7	4	2	3	5	2	3	47
50	60	-	7	4	5	7	7	4	2	3	5	6	7	57
40	50	-	9	6	8	9	9	3	5	8	5	8	5	75
30	40	-	10	5	6	9	11	9	10	6	7	8	9	90
20	30	-	11	9	6	8	11	6	13	9	7	6	8	94
10	20	-	11	13	12	9	15	5	8	9	9	13	11	115
-100	10	-	14	13	12	15	10	11	12	16	16	13	11	143
Total U	•													
Aggregat		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Total
Rar 90	ige 100	34	21	23	12	34	32	21	13	32	23	42	12	299
80	90	34	23	44	52	34	32 43	54	23	32 43	52	13	32	443
70	80	22	23 31	44	30	32 29	43 48	43	60	43	52 53	45	32 35	443 477
60	70	28	3 i 29	43	53	43	40 54	43 49	56	40 47	55	53	36	546
		26 55	67	43 54	74	43 55	45	49 55	36	47 53	43	55	36 41	633
50	60	67	64	62	7 4 45	76	88	69	52	65	63	86	75	812
40	50													
30	40	56	63	67	74	72	77	77	81	91	90	91	90	929
20	30	67	69	76	84	111	95	87	60	81	77	76	78 50	961
10	20	123	124	107	104	97	94	93	95	77	73	69	58	1,114
-100	10	99	93	96	68	93	107	89	94	128	125	113	76	1,181









PD 2.0

P	Probability of Default														
		ate Score inge	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Total
	90	100	0.00%	9.52%	8.70%	8.33%	2.94%	3.13%	14.29%	46.15%	9.38%	8.70%	4.76%	8.33%	8.03%
	80	90	0.00%	13.04%	11.36%	3.85%	6.25%	4.65%	5.56%	13.04%	6.98%	7.69%	30.77%	15.63%	8.13%
	70	80	0.00%	22.58%	7.32%	13.33%	13.79%	10.42%	6.98%	3.33%	7.50%	3.77%	6.67%	11.43%	8.39%
	60	70	0.00%	17.24%	11.63%	11.32%	11.63%	12.96%	8.16%	3.57%	6.38%	9.09%	3.77%	8.33%	8.61%
	50	60	0.00%	10.45%	7.41%	6.76%	12.73%	15.56%	7.27%	5.56%	5.66%	11.63%	10.91%	17.07%	9.00%
	40	50	0.00%	14.06%	9.68%	17.78%	11.84%	10.23%	4.35%	9.62%	12.31%	7.94%	9.30%	6.67%	9.24%
	30	40	0.00%	15.87%	7.46%	8.11%	12.50%	14.29%	11.69%	12.35%	6.59%	7.78%	8.79%	10.00%	9.69%
	20	30	0.00%	15.94%	11.84%	7.14%	7.21%	11.58%	6.90%	21.67%	11.11%	9.09%	7.89%	10.26%	9.78%
	10	20	0.00%	8.87%	12.15%	11.54%	9.28%	15.96%	5.38%	8.42%	11.69%	12.33%	18.84%	18.97%	10.32%
	-100	10	0.00%	15.05%	13.54%	17.65%	16.13%	9.35%	12.36%	12.77%	12.50%	12.80%	11.50%	14.47%	12.11%

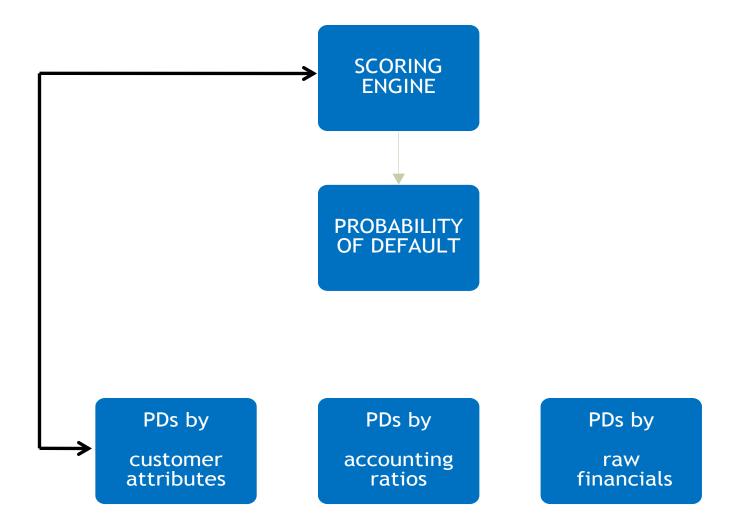








Feedback Loop











Feedback 1.0

Interest (Coverage	PD	Sales G	rowth	PD	Leve	rage	PD
-10.00	-5.00	5.26%	-100.0%	0.0%	5.45%	-1.00	0.20	3.38%
-5.00	0.00	1.28%	0.0%	10.0%	6.18%	0.20	0.50	5.53%
0.00	5.00	6.48%	10.0%	20.0%	5.03%	0.50	0.70	5.93%
5.00	10.00	4.59%	20.0%	30.0%	8.97%	0.70	1.00	6.89%
10.00	15.00	5.99%	30.0%	40.0%	5.88%	1.00	1.20	10.00%
15.00	20.00	5.51%	40.0%	50.0%	0.00%	Sec	tor	PD
20.00	25.00	1.49%	50.0%	70.0%	5.47%	SME		5.04%
25.00	30.00	1.33%	70.0%	100.0%	3.48%	Corporate		3.85%
30.00	35.00	0.00%	100.0%	200.0%	5.67%	Current R	atio	PD
35.00	40.00	9.09%	200.0%	300.0%	3.77%	0.00	2.00	5.44%
40.00	45.00	0.00%	300.0%	400.0%	2.00%	2.00	3.00	4.89%
45.00	50.00	0.00%	400.0%	500.0%	5.00%	3.00	4.00	3.35%
50.00	100.00	0.00%				4.00	5.00	3.10%
						5.00	7.00	2.50%









PD Snapshot

Score	Range	Updates	Events	PD
81	100	574	14	2.40%
61	80	535	7	1.28%
41	60	2,679	53	1.98%
21	40	1,985	28	1.42%
0	20	604	3	0.42%

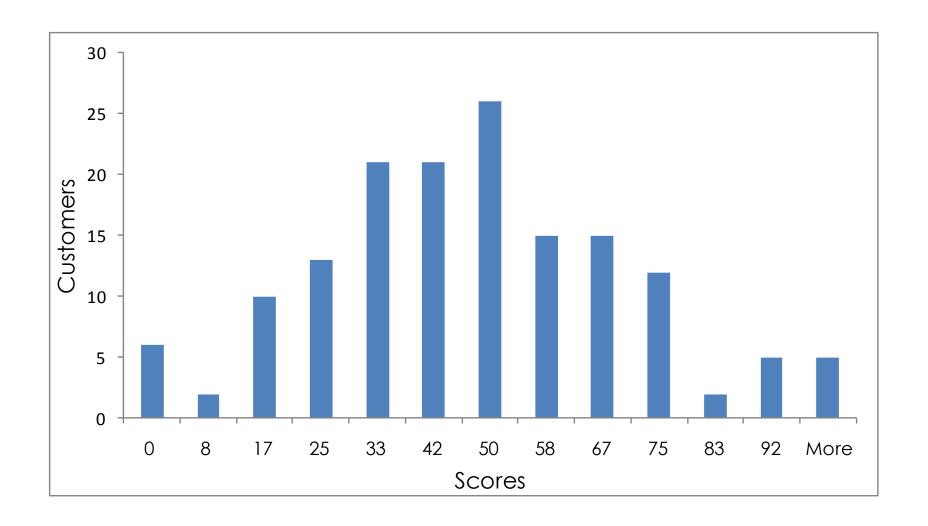








Score Distribution



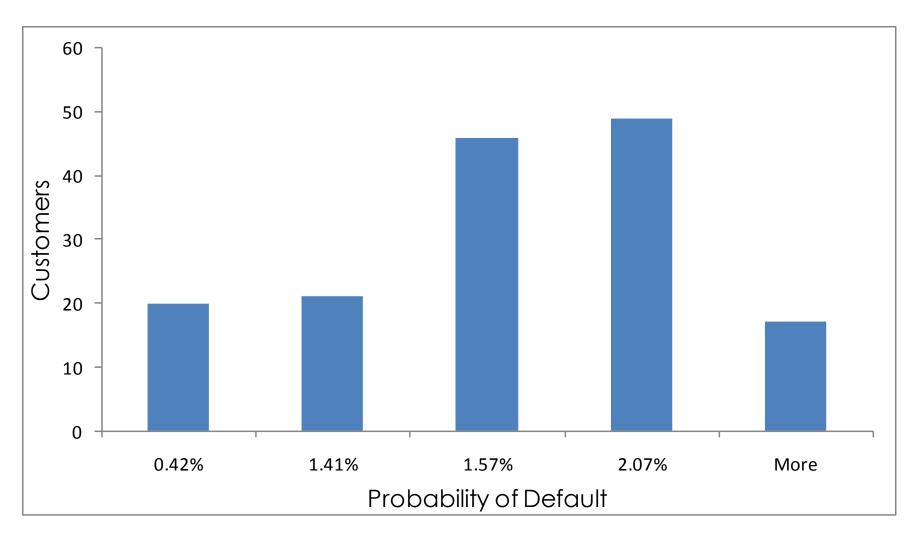








PD Distribution











PD 3.0

CUSTOMER PROFILE

Basic Attributes & Financials

PAYMENT BEHAVIOR

Amounts & Status

Customer Score

Credit Event

Probability of Default









PD 4.0

CUSTOMER SNAPSHOT

CUSTOMER FINANCIALS

PAYMENT BEHAVIOR

FACILITY INFORMATION

Customer Score

Credit Event

Probability of Default









PD 5.0

CUSTOMER SNAPSHOT **CUSTOMER** FINANCIALS

PAYMENT BEHAVIOR FACILITY INFORMATION

Scoring Engine

Customer Score **Updates**

Default Definition

Credit Event



Probability of Default



Re-scoring engine

Customer Financials **Customer Profile Determine Scoring Elements Assign Sector Specific Weights** to Scoring Elements Compute sector **COMPUTE** specific scoring **SCORING** elements for each **ELEMENTS** customer Map scoring elements to rating Mapping scores For elements 1 to **CUSTOMER** n, Σ scores for all **SCORE**

weighted elements

Transition Matrix

Others												
	1	2	3	4	5	6	7	8	9	10	11	12
1	-	-	-	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	152.21	-	-	-	-	-	-	-	-	-
4	-	-	-	46.04	-	-	-	-	-	1.30	-	141.44
5	-	-	-	-	31.35	-	-	-	-	-	-	0.39
6	-	-	-	-	-	0.44	56.65	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	7.32









Challenges

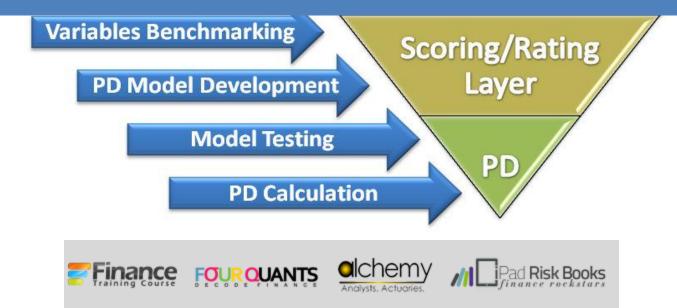




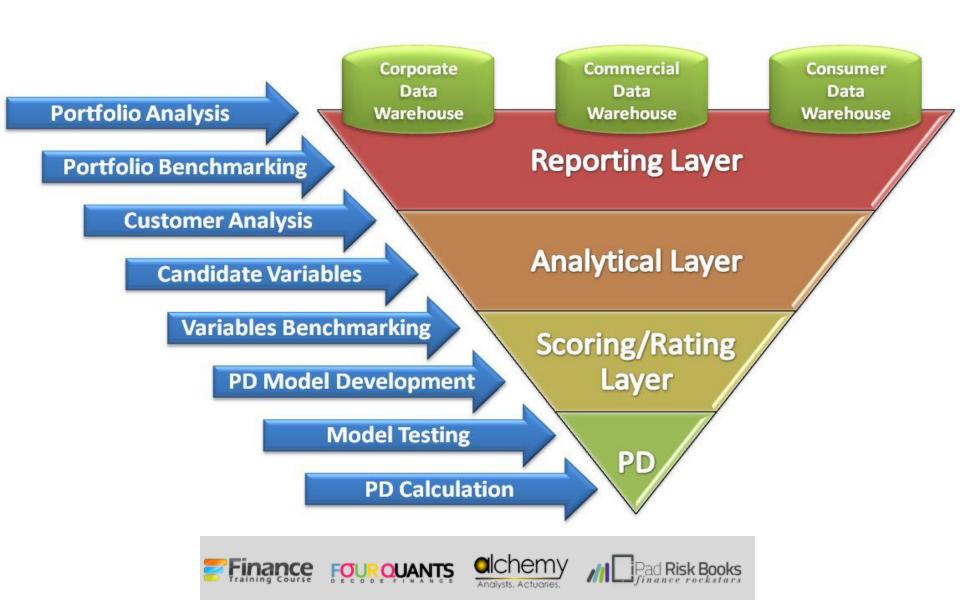




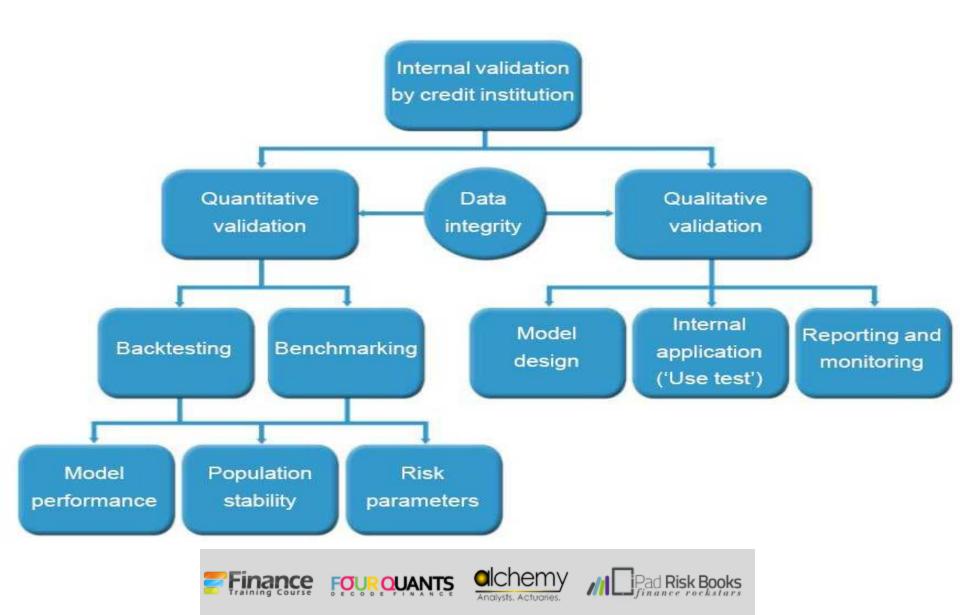
Project Scope



The Pooled PD vision



Data & Process



Merton's









Merton PD Model Mapping

Spot Price

- Spot price of Firm Assets
- Market Value of Firm Assets

Strike Price

• Book Value of Firm Debt

Volatility

- Volatility of Assets
- Volatility of Equities MV of Equities

Time

• 1 year? Term of loan or firm liabilities

Risk Free Rate

Risk Free Rate











$$c(S,t) = SN(d_1) - Xe^{-r(T-t)}N(d_2)$$

where:

 $N(\cdot)$ distribution function for a standard Normal (i.e. N(0,1))









Merton's

Equity =
$$V *N(d1) - \\ exp(-rt)*D*N(d2)$$

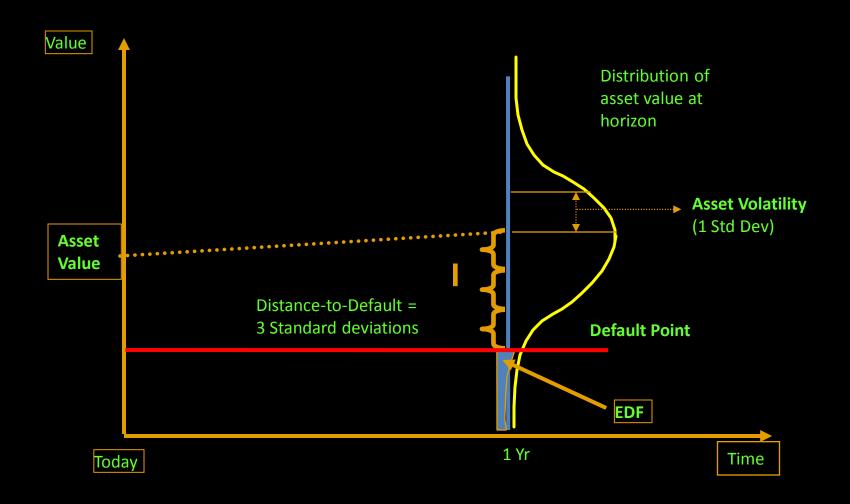








EDF/Structural Approach











Merton PD Equation

$$V_E = V_A N(d1) - e^{-rT} X N(d2)$$

where

 V_E is the market value of the firm's equity,

$$dl = \frac{\ln\left(\frac{V_A}{X}\right) + \left(r + \frac{\sigma_A^2}{2}\right)T}{\sigma_A \sqrt{T}},$$

$$d2 = d1 - \sigma_A \sqrt{T}$$
 , and

r is the risk free interest rate.

$$\sigma_E = \frac{V_A}{V_E} \Delta \ \sigma_A$$









Call Option

Change in derivative value X When prices increase A call option gets more valuable ownership of a call as prices rise option is very similar to ownership of underlying security 0 -X X Change in underlying's Option Premium Price -X.









The Usual Suspects

	The Usual Suspects							
	Market Cap / Equity	Pretax Income						
Submitting Bank	Base (USD Billions)	(USD Billions)						
Bank of America	230	1						
JP Morgan Chase	184	19						
HSBC	136	22						
The Royal Bank of								
Scotland Group	116	(1)						
Bank of Tokyo-								
Mitsubishi UFJ Ltd	108	7						
Barclays Bank plc	101	9						
Citibank NA	77	11						
Lloyds Banking								
Group	72	4						
Deutsche Bank AG	69	6						
Royal Bank of								
Canada	69	7						
Credit Agricole CIB	64	(2)						
Société Générale	61	3						
Rabobank	58	4						
UBS AG	57	4						
The Norinchukin								
Bank	53	2						
BNP Paribas	48	8						
Credit Suisse	32	29						
Sumitomo Mitsui								
Banking								
Corporation Europe								
Ltd (SMBCE)		alchemy P						
Source: Public Data. Compiled by FinanceTrainingCourse.com								

Assignment – 48 hours

- Estimate trailing PD's using the structured approach for the following 6 banks
- Barclays
- BAML
- HSBC
- JP Morgan Chase
- Royal Bank of Canada
- RaboBank

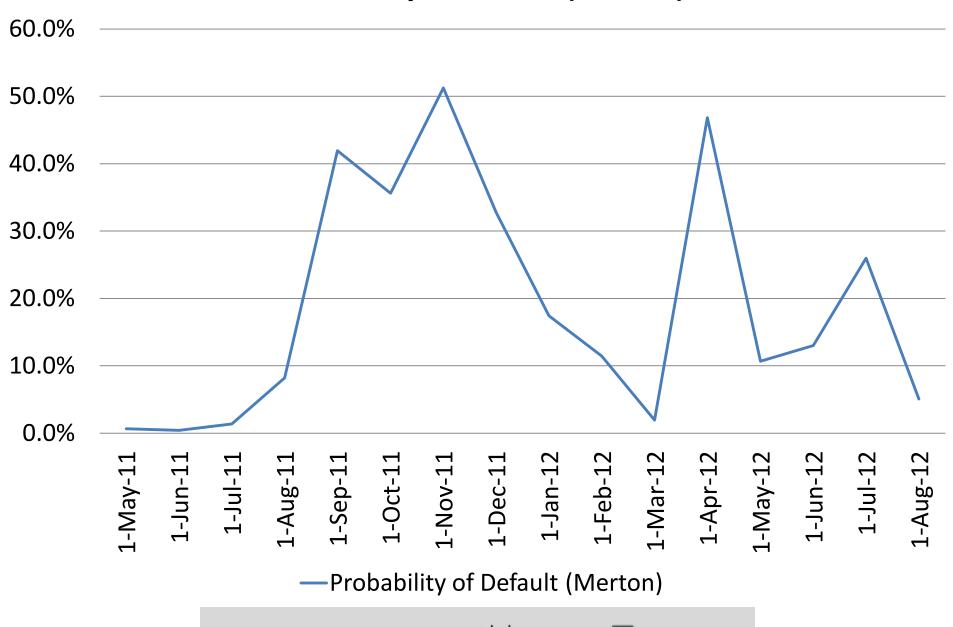








Probability of Default (Merton)



Probability of Default (Merton)

