

Overview of new accounting standard IFRS 9 and impact on credit risk models

9th February 2015



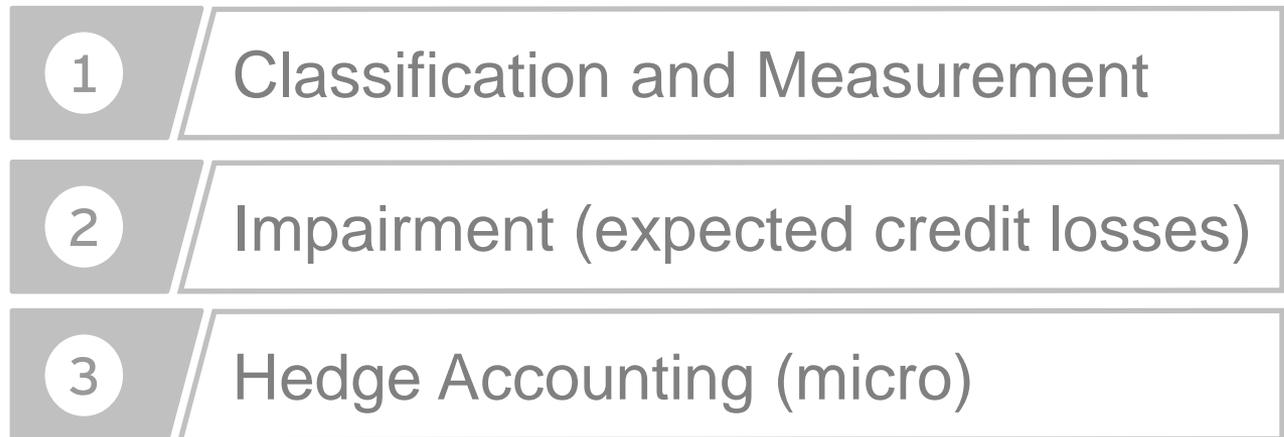
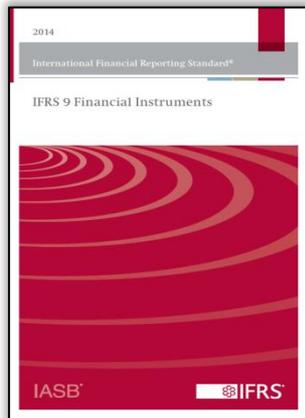
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Agenda

- ▶ Introduction and effective date
- ▶ Expected credit loss model
- ▶ Impact on credit risk models

Introduction and effective date

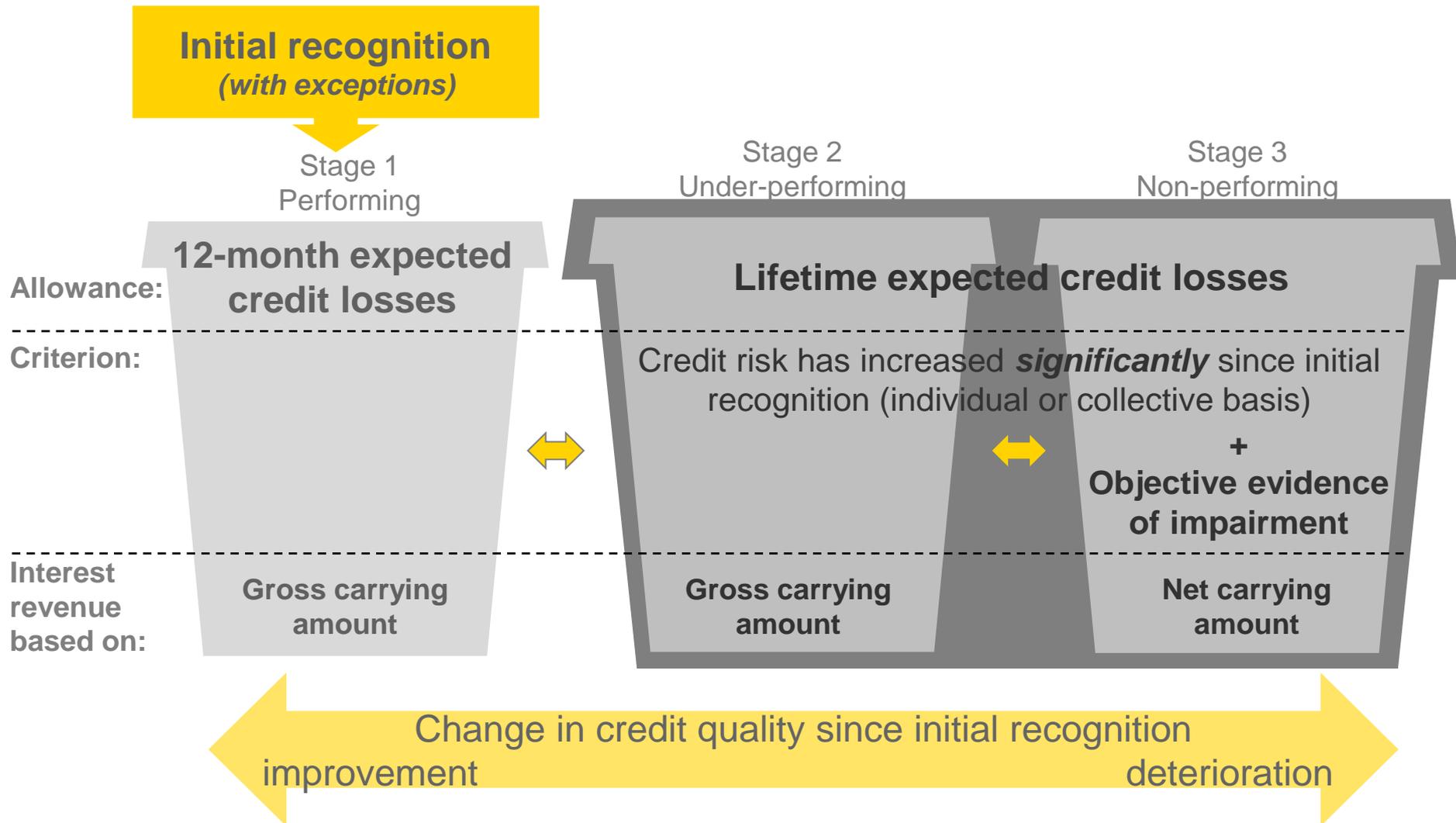
- ▶ On 24 July 2014, the International Accounting Standards Board (IASB) issued the final version of IFRS 9, bringing together all three phases of the financial instruments project:



- ▶ IFRS 9 is effective for annual periods beginning on or after 1 January 2018, with early application permitted

Expected credit loss model

General approach



Expected credit loss model

Challenge 1

Challenge 1

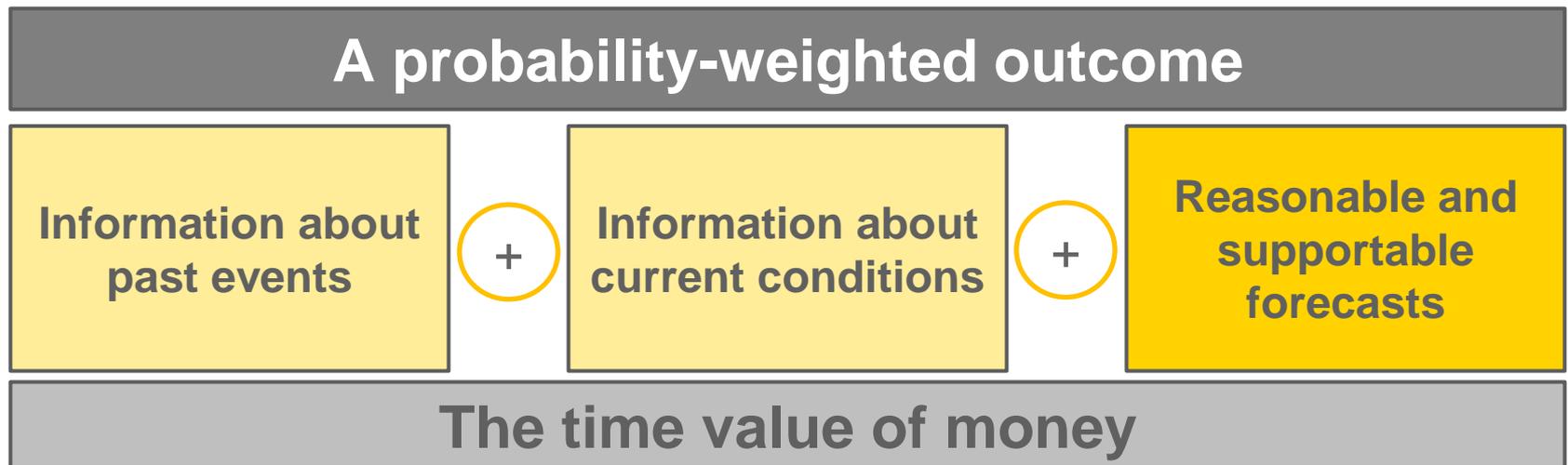
Significant deterioration in credit quality since initial recognition

Practical challenges

- ▶ Significant increase in credit risk since initial recognition should be monitored:
 - ▶ It should be assessed at the time of implementation: since when do you use your rating models?
 - ▶ Behavioural models are necessary
 - ▶ Change in risk over remaining life of the loan – 12M PD might not be enough: do you have bullet loans in your portfolio?
 - ▶ Different approaches for individual loans of one client
 - ▶ Use of decentralized approaches – difficulty to compare results across subsidiaries
 - ▶ Use of other than “PD-based” approaches – e.g. loss rate approach – might be challenging as collateral should not be considered in the analysis of credit risk development

Definition of 12-month and lifetime expected credit losses

- ▶ **Lifetime ECL** = expected credit losses that result from **all possible default events** over the **expected life** of a financial instrument
- ▶ **12-month ECL** = a portion of lifetime expected credit losses that result from **default events** on a financial instrument that are **possible within the 12 months** after the reporting date.



Expected credit loss model

Challenge 2

Challenge 2

Calculation of life-time and 12M expected credit losses for entire portfolio

Practical challenges

- ▶ 12M Expected losses:
 - ▶ PD/LGD models should be created for all portfolios (Banks, Sovereigns, etc.)
 - ▶ LIP of 1 is required
- ▶ Life-time expected losses – life-time PD and Exposure models are required
- ▶ Forward-looking models – macroeconomic conditions should be reflected (HPI, UR, FX)

Modelling considerations

General

- ▶ The definitions of 'expected credit losses' and 'risk of a default occurring' are identical to the Basel definitions of 'EL' and 'PD'
- ▶ **BUT adjustments will be required** to remove the effects of Basel rules, including:
 - ▶ Remove through-the-cycle assumptions of default and conservatism bias (for instance regarding LGD)
 - ▶ Have a forward-looking estimate of PD and LGD(!) that is available **without undue cost or effort** at the reporting date

IRB banks

- ▶ You build on the existing Basel and provisioning models
- ▶ You have to build:
 - ▶ life-time PD models
 - ▶ models for uncovered portfolios (institutions, sovereign, etc.)
- ▶ EAD forecasting models (especially for revolving loans)

Non IRB banks

- ▶ You have to build something phenomenologically new
- ▶ Modelling considerations will be significantly different for retail and low default (corporate/SME portfolios)

Highlights of the new impairment approach

- ▶ Loss allowance required for all credit exposures
- ▶ Earlier recognition of credit losses
- ▶ Likely to increase the loss allowance due to expected loss approach and earlier life-time expected losses - depending on portfolio and current practice
- ▶ Potential volatility due to changes in economic conditions and movement between 12-month and lifetime expected credit losses
- ▶ Need to consider forecasts of future economic conditions
- ▶ Impact on regulatory capital due to impact on equity
- ▶ Modification of current credit risk management and reporting systems

Thank you



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