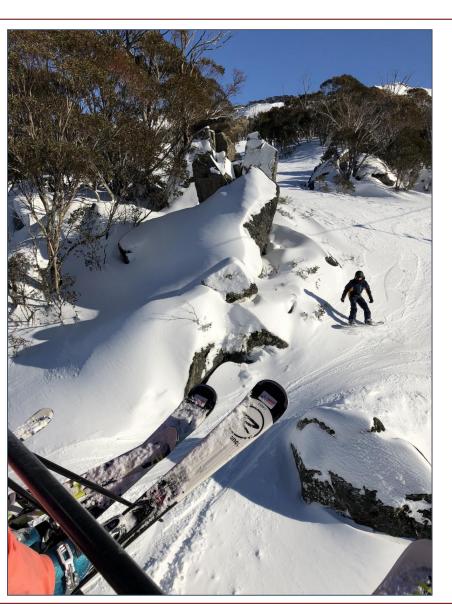
Operational Risk Appetite





The amount and type of risk we are prepared to seek, accept or tolerate in pursuit of our objectives

Some targets are inherently more risky than others



Disclaimer and Opinion: Martin Davies of Causal Capital has authored this presentation for educational and explorative purposes. The Institute of Operational Risk doesn't opinion, endorse or validate the content within and does not accept any liability or claim born from this work.

Author

SME - Risk Framework Architect







Martin Davies

SME Banking & Risk Management

Banking | Markets | Corporate Finance | Structured Finance

25 Years experience

Martin is a **risk framework architect** who designs **risk**, **pricing**, **measurement systems** and **products** for banks, brokerages, exchanges, energy houses and manufacturing companies. He has more than twenty years' experience developing bespoke **reporting**, **valuation** and scorecard solutions for institutions with a particular focus on **operational** and **credit risk** but also product control. He is comprehensively versed in **corporate finance**, **markets**, **treasury services**, **structured products**, **cash management**, **trade** and **project finance**.

He has worked with some institutions performing operational audits, exposure to complex processing environments and performed investigations into operational events. A solid background in risk assessment and strong knowledge in various quantification methods for measuring product / risk performance. Involvement in the design and operationalization of new facilities and involved in business process redesign to reduce cumulative effects of error on processing environments. Martin not only understand various aspects of operational risk including quality control, stress testing and fragility modelling, he is also well versed in financial risk modelling, due diligence and valuation. Enterprise level risk assessment, including contracts, credit risk, strategy and designing optimised solutions for control hazards across the supply chain.

Worked with regulators, exchanges, development banks and tier one international banks and accredited with the American Academy of Financial Management on structured finance, project finance, credit & operational risk.

Martin is a diverse hands on risk manager who works across risk management top to bottom.

Causal Capital

Who is Causal Capital & what we do





What we do

Causal Capital is a Risk, Finance and Project Management training and consulting business that offers clients various services including:

- Off the Shelf & Bespoke Training
- Consultative Knowledge Transfer
- Risk Framework Development
- Risk System Gap & Assurance Reports
- Next Generation Risk Management

Our Clients

Our clients range from large multinational conglomerates, governments, regulators and education bodies through to small local businesses looking to improve the quality of their decision making oversight infrastructure.

CommonwealthBank



Operational Risk Appetite A Framework for Risk Appetite

Webinar

A systematic way to allow individual risk appetites to be expressed and governed across an organisation

Risk Appetite

With all endeavours always start out with a definition



- **✓** IOR Inspired **Appetite** Definition
 - The amount and type of risk that an organisation is prepared to seek, accept or tolerate.
- ✓ MD Inspired Risk Tolerance Definition
 - How much uncertainty / volatility / risk a system can absorb before it fails.
- **✗** ISO 73:2009 Tolerance Definition
 - II An organization's or stakeholder's readiness to bear the risk after risk treatment in order to achieve its objectives.

Don't make these definitions unnecessarily complicated and stay close to a dictionary explanation to ensure the meaning remains natural and neutral.

The number of people that misinterpret the natural language of definitions is unbelievable as we can see.

It follows ...

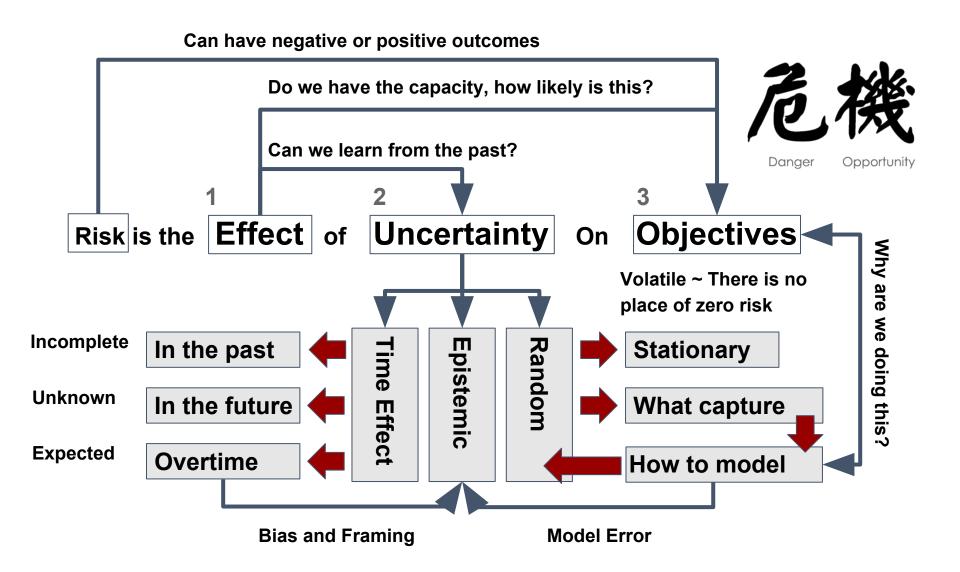
- Risk Appetites that exceed maximum upper thresholds or tolerance levels are dangerous places to operate.
- Setting Risk Appetites for those who have skin in the game by those who don't is an immoral activity.
- Ignoring Risk Appetites altogether is quite simply negligent.

So many different industry accepted definitions ~ Risk Managers must be clear with what they truly mean, define your terms!

Risk Definition



Risk is an intangible asset, part of the domain of uncertainty



Source of Confusion I

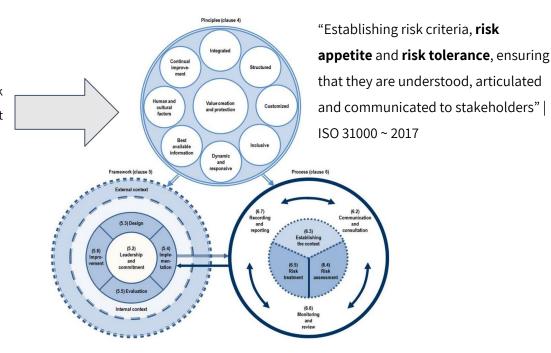
Political Lobby ERM & 31000 Community Fractured



II ISO 31000 Practitioners reject the concept of Risk Appetite.

When ISO 31000 released its inaugural interpretation of a risk management framework in 2009, the enterprise risk management community was fractured and for good reason ...

- ISO 73 Definitions were not consistent with industry or standard practice. No real life case studies existed.
- The ISO 31000 guideline makes no mention to risk appetite but ISO 31010 Risk Assessment techniques certainly does.
- Risk Appetite is a well established ideology in strong risk management fields such as banking, investments, finance, markets and other applications of risk such as in the military.
- Some members of the ISO 31000 community lobbied risk appetite be translated to "levels of risk" and "risk attitude" to differentiate ISO doctrines away from other risk practices.
- New ISO 31000 Drafts have seen many members of the ISO community backtrack and flip on their earlier beliefs to begrudgingly embrace various concepts including risk appetite.



Even today, only hours ago, confusion continues ...

Ah! What you did not know is that I had been doing this stuff for 30 years then (41 years now) and I only worked for Arthur Andersen for a

(21h) ·

The process I use now is the same as that we used 41 years ago - not to assess risk but to help make decisions where the outcomes were uncertain. There were no risk registers or risk appetite statements then and you have

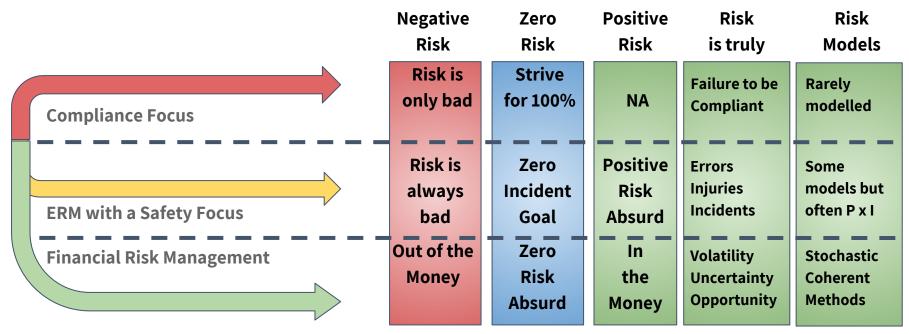
Senior ISO 31000 practitioners not aligned with ISO 31000

Source of Confusion II

Different agendas and interpretations of risk



Depending on who you are, your culture, your operating environment ... Your interpretation of what a risk is will be different to what it may be to someone else, even under the same conditions.



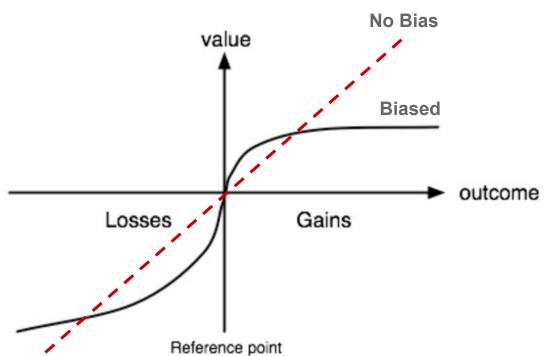
As some practitioners of risk management only see risk as having negative attributes, it is understandable that proposing an appetite for anything negative is quite simply bizarre. One way forwards here is for enterprise risk managers to improve their knowledge in the world of finance, just as an example. Considering ERM units often report risk in terms of currency, this would surely be useful. Other solutions include practitioner or standards boards developing and publishing suitable models on risk appetite from adjacent risk disciplines.

Source of Confusion III

Stakeholder Bias Adjust for Perception



There is another problem ... People don't weight uncertainty that has negative outcomes or potential gain with the same measurement stick. They can be overly risk averse or unrealistically optimistic, they can be biased.



$$V = \sum_{i=1}^n \pi(p_i) v(x_i)$$

where V is the overall or expected utility of the outcomes to the individual making the decision, x_1, x_2, \ldots, x_n are the potential outcomes and p_1, p_2, \ldots, p_n their respective probabilities and v is a function that assigns a value to an outcome.

Prospect Theory was created in 1979 - 1992 by Daniel Kahneman and Amos Tversky as a way to psychologically improve accuracy for describing how people form decisions when facing uncertainty. People weigh their choices based on what they chance to lose, how much they can afford to lose, what they have experienced, their religion, culture, duration of risk and many other factors. Over the years many of the systemic risks including the Global Financial Crisis were centred around the paradoxes of poor decision making as an outcome of weak perception.

Financial Risk Context



Chosen risks including investment & credit risk will have appetites

original	probability of rating after five years (percent)							
rating	AAA	AA	Α	BBB	BB	В	CCC	Default
AAA	72.39	21.69	4.74	0.86	0.20	0.08	0.01	0.02
AA	2.49	66.45	25.05	4.45	0.75	0.51	0.09	0.18
Α	0.39	8.19	68.22	18.05	3.19	1.32	0.18	0.50
BBB	0.16	1.72	16.80	60.61	13.16	4.68	0.79	2.08
BB	2 0.13	0.53	3.81	19.50	44.77	19.84	3.09	8.34
В	0.06	0.42	1.62	4.15	15.18	46.97	6.54	25.15
CCC	0.34	0.20	1.21	3.05	6.33	18.10	12.36	58.51
Default	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00

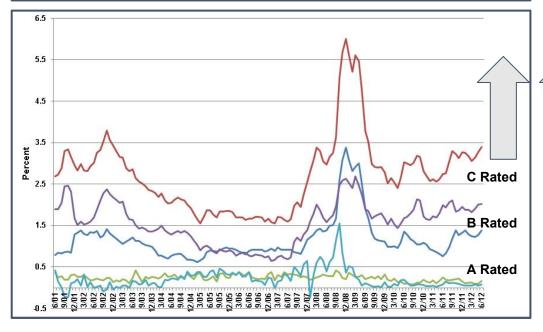
Risk Increases

In the world of finance, high-risk investments are also valuable! Concisely, poor quality ratings tend to yield more to investors. This confuses a lot of people away from finance but the reason under this phenomenon is very simple.

Say you were given two investments, one being low risk and the other high risk, the high-risk investment has to pay more back to you as an investor (yield) to attract your interest away from the low-risk benchmark alternative.

In the diagram to the left, C Rated companies are paying more interest on borrowed funds than A-Rated companies; they also have a higher probability of defaulting at any point of time during the investment.

Where to invest in this opportunity space is part of an investor's Risk Appetite.

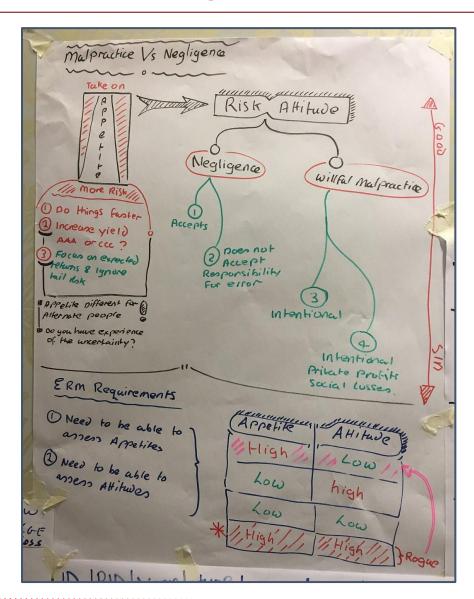


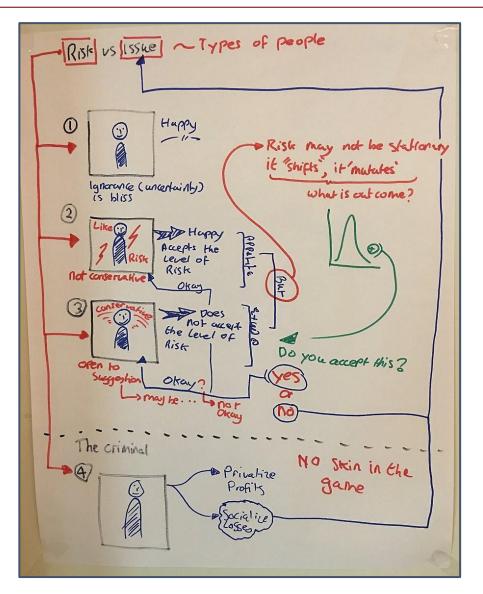
Yield Increases

Risk Appetite Behaviour



Causes that bring risk appetites us to a point beyond conciliation





Case Study: Failure

The transocean catastrophe was a failure of risk~control appetites



Malpractice and Negligence are not the same things and Risk Attitude makes a big difference.

Risk Attitude is NOT Risk

Appetite. Actors behave

differently when they have skin
in the game and there is a
reason why the Three Lines of

Defense stands ~ to assign
accountability.

Under the US Clean Water Act, a ruling of negligence would have meant BP was liable to pay \$1,100 per barrel of oil spilled; gross negligence increases the penalty to \$4,300 per barrel.

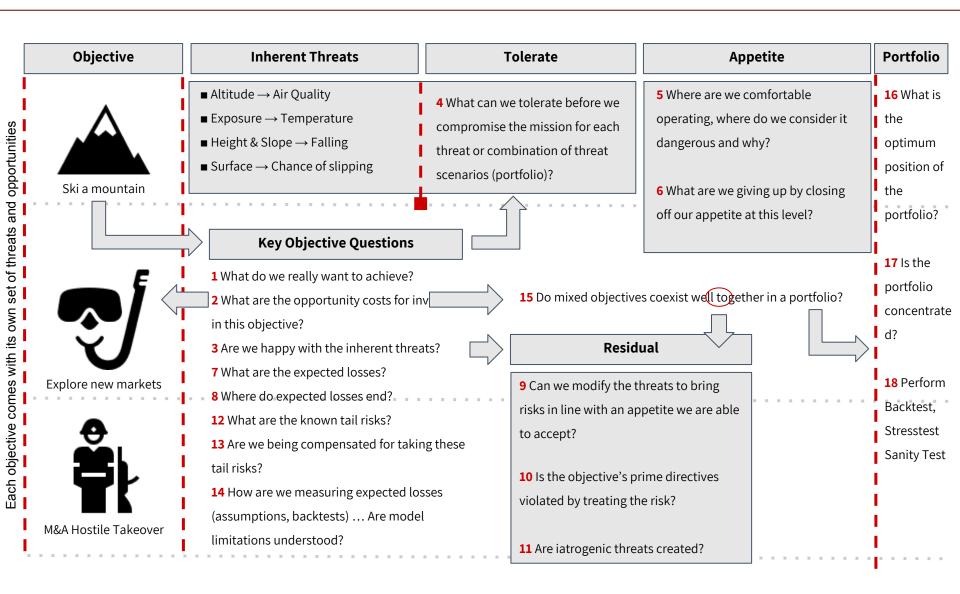
More Information here [LINK].

BP, Transocean Deep Water Horizon explosion

Key Question Flow

93

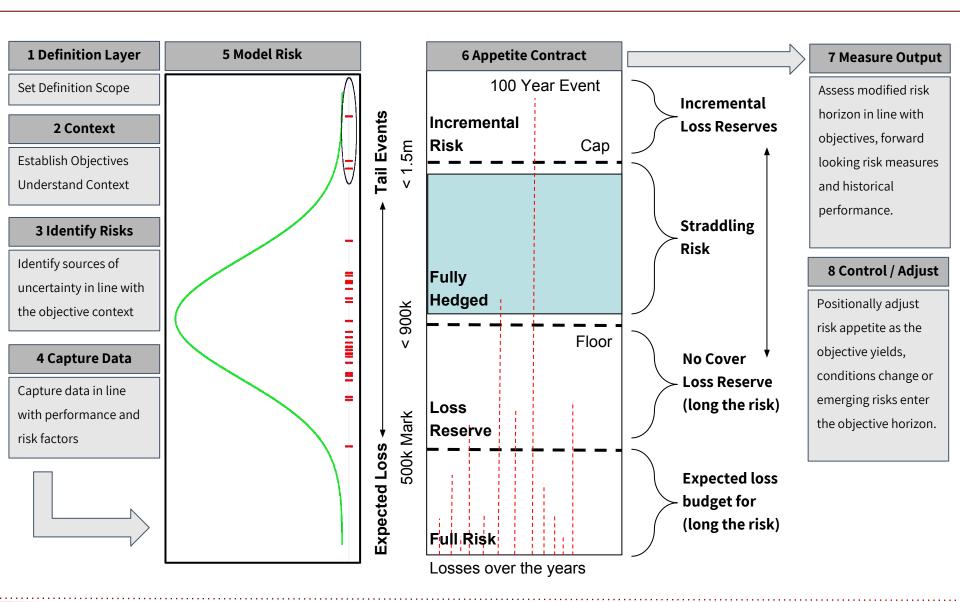
Typical question set that needs to be put to stakeholders



8 Finite Risk Appetite Steps



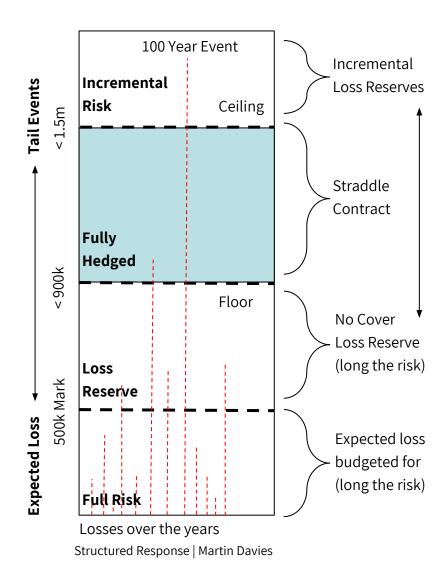
A simple approach for assessing a stakeholder's risk appetite



Structured Risk Response



Effective Risk Appetite framework results in structured risk responses



In the example to the left, a business faces losses that are randomly distributed over different periods of operation from stormy weather. If the risk manager takes no action, there will be some years when the losses are very large, so large that the business may not even be able to remain solvent.

If the manager insures for all losses from the 10k limit up (just as an example), the insurance premiums are going to be potentially worse than the actualized risk experienced over the average year. This is not optimum or effective because it transfers too much risk to the 2nd party.

By carefully setting different thresholds throughout the range of potential losses, the business can balance premiums for cover and reduce their uncertainty inline with their appetite for risk.

In the full risk area below the 900k threshold, the business reserves for losses or prices these costs into the operating cost model of the business. In the blue banding, the company is fully hedged but above that, losses are incrementally charged. It is important to note that the insurance premiums are lower with this model because the total exposure the insurance company faces is now capped by the straddle contract. The use of Extreme Value Theory allows for this structured risk solution to be designed with "relative pricing accuracy" reducing loss exposure but in an effective way and optimised way.

Comparing Risk Treatment Structures



Mixing contracts in the same asset class can have very different effects

[RA]

What is the cost

What do you expect

What is the likely downside

Are you aware of the tail threats

How long to wait

The portfolio effects of multiples risks across multiple objectives will alter risk appetites substantially.

Risk appetites need to be considered at aggregate levels and that will require consistent reporting.

Buying a single call contract for Oct 18 in belief that oil will rise ... How does it feel?

Order Description	BUY +10 /CLV8 1/1000 OCT 18 /LOV8 71 CALL @.66 LMT [TO OPEN]
Break Even Stock Prices	71.66
Max Profit	Infinite
Max Loss	\$6,600.00 (not including possible dividend risk)
Cost of Trade including commissions + fees	\$6,600.00 + \$22.50 +\$15.10 @ = \$6,637.60
Buying Power Effect	(\$6,746.00)
Resulting Buying Power for Stock	\$186,508.00
Resulting Buying Power for Options	\$93,254.00

Buying a single vertical contract for Oct 18 in belief that oil will rise but without greed ... How does it feel?

BUY +10 VERTICAL /CLV8 1/1000 OCT 18 /LOV8 71/71.5 CALL @.14 LMT [TO OPEN/TO O
71.14
\$3,600.00
\$1,400.00 (not including possible dividend risk)
\$1,400.00 + \$45.00 +\$30.20 🚱 = \$1,475.20
(\$1,451.00)
\$197,098.00
\$98,549.00
֡

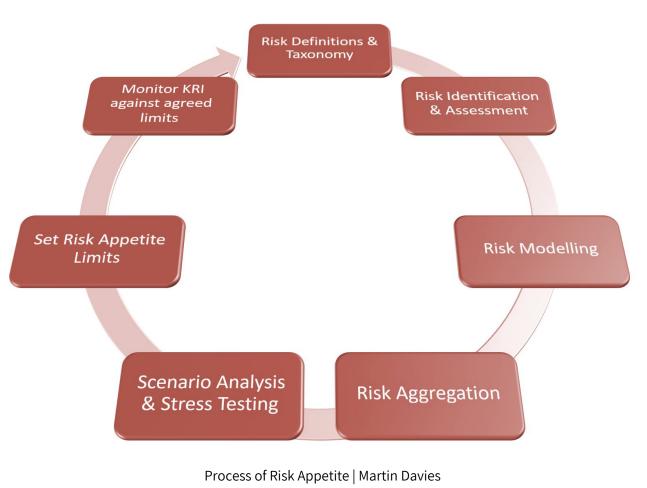
What happens if we break our vertical contract apart without netting the effects ... How does it feel?

Order Description	SELL -10 /CLV8 1/1000 OCT 18 /LOV8 71.5 CALL @.50 LMT [TO OPEN]
Break Even Stock Prices	72.00
Max Profit	\$5,000.00
Max Loss	Infinite
Cost of Trade including commissions + fees	credit \$5,000.00 - \$22.50 -\$15.10 🔞 = credit \$4,962.40
Buying Power Effect	(\$24,582.00)
Resulting Buying Power for Stock	\$ 150,836.00
Resulting Buying Power for Options	\$ 75,418.00

Risk Appetite Process



Risk Managers will need to modify their risk management process



The formal management of risk appetites will end up being a process that is inserted into existing risk management practices.

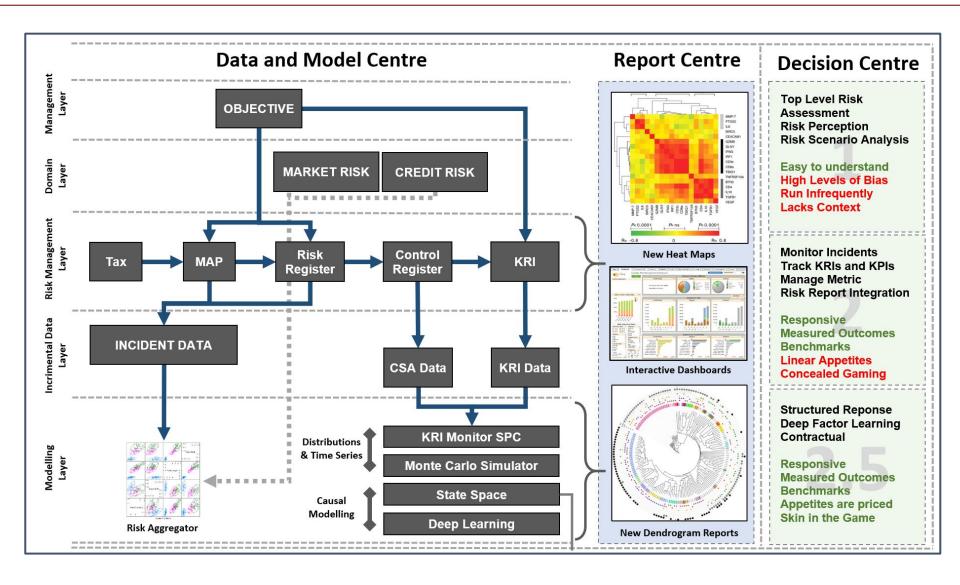
Risk Appetites work at a business unit management level as nothing more than limits which are agreed, monitored and reported upon.

Risk Appetites at a board level will required consolidated and aggregated reports like Economic Capital to be in place.

For companies that are measuring Risk Adjusted Return on Capital, the process of risk appetite is much more straightforward to manage.

Framework Elements

Risk Appetite cannot be ascertained without a functioning Risk Framework



Bottom Up Case: MC Simulation



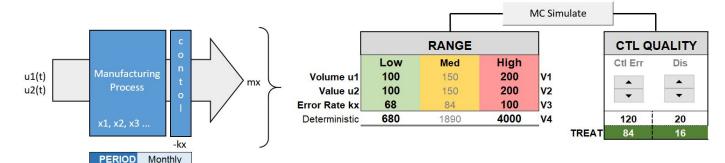


Simulation Example

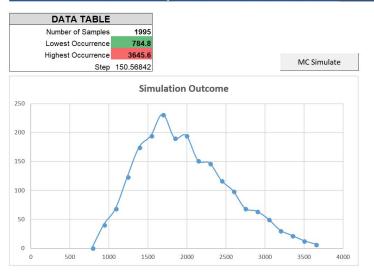
Spreadsheet model [LINK]

Part 1 - The Business Situation

Imagine we have a manufacturing plant which is processing various inputs to create a special product. However, things don't always work out as planned because of errors in our detection control. Unfortunately, this allows faulty products to be released to our clients which results in losses.



Part 2 - Stochastic Perspective from Simulation



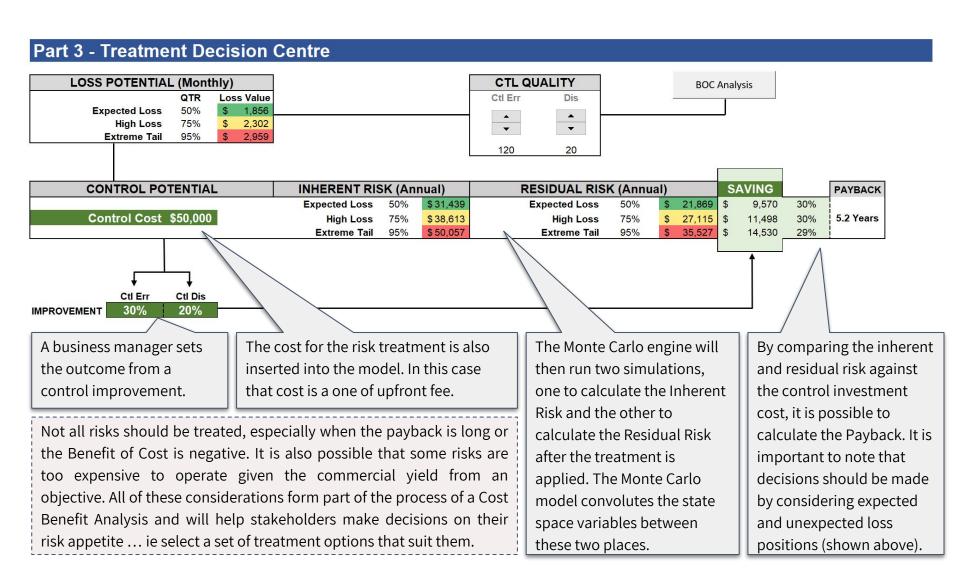
STRATIFICATION SET						
	QTR	Magnitude	Frequency			
1	5%	784.8	1			
2	10%	935.368421	41			
3	15%	1085.93684	69			
4	20%	1236.50526	124			
5	25%	1387.07368	175			
6	30%	1537.64211	195			
7	35%	1688.21053	232			
8	40%	1838.77895	191			
9	45%	1989.34737	195			
10	50%	2139.91579	152			
11	55%	2290.48421	147			
12	60%	2441.05263	117			
13	65%	2591.62105	99			
14	70%	2742.18947	69			
15	75%	2892.75789	64			
16	80%	3043.32632	50			
17	85%	3193.89474	31			
18	90%	3344.46316	22			
19	95%	3495.03158	13			
20	100%	3645.6	7			

In our demonstration we evolve the State Space concept through a Monte Carlo model that generates an outcome based on a set of commercial variables. In this example a business manager will need to define these commercial variables before inserting the factors into a Monte Carlo simulation as shown. Please note that a single risk or control failure has many outcomes not one risk level!

Bottom Up Case: Benefit of Cost



If you don't have the Risk Appetite, can you benefit from the cost?



In the Banking Domain



Simply reporting without Risk without 'Appetite Adjustment' is a FAIL

			31 Dec 15 Total	31 Dec 15 Total	30 Sept 15 30 Total	Sept 15 Tota
St	arting from January 1	2015	2016	2017	2018	201
Mi	nimum LCR	60.0%	70.0%	80.0%	90.0%	100.
D.	rticulars	1.4	Takal	:l.4d		
Fa	Farticulars		Total unweighted value (average)		Total weighted value (average)	
Hig	gh quality liquid assets					
1	Total high quality liquid ass	ets		N.A.	5	34,184
Ca	sh outflows					
2	Retail deposits and deposits	from				
	small business customers, of	of				
	which:		2,1	66,232.6	1	95,869
(i)	Stable deposits			15,068.1		20,753
(iii				51,164.5	175,116	
,,,,	Unsecured wholesale funding	ng, of	.,,	. ,		,
3	which:	.0, -1	8	43,829.9	4	16,069
۳	Operational deposits (all			,020.0	410,009.	
(i)			1	44,097.4		36,024
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Non-operational deposits (all		,557.4		00,02
l l (ii)			661,388.5 341		41,700	
(iii					38,343	
4	Secured wholesale funding			N.A.		30,040
1	Additional requirements, of			14574		
5	which:		1	07,404.9		61,11
(i)		ivo		07,404.3		01,117
(1)	exposures and other collat					
	requirements	Ciai		8,782.9		8.782
\vdash	Outflows related to loss of			0,702.3		0,702
(ii)				414.8		414
(iii			2	98,207.2		51,920
(III)	Other contractual funding	5		30,207.2		51,920
6	obligations			49,265.9		49.265
 	Other contingent funding			+9,205.9		45,20
7	obligations		10	40,289.6		97,014
8	Total Cash Outflows		1,9	N.A.		9,337
Pa	Particulars		Total unwe value (ave		Total wei value (av	
	Secured lending (e.g. revers	se				
9	repos)			-		
	Inflows from fully performing					
10	exposures		2	45,792.4	1	93,081
11	Other cash inflows			38,273.5		21,435
12			28	4,065.8		4,517
13	Total HQLA			N.A.	53	4,184
14	Total Net Cash Outflows	3		N.A.	60	4,819
15	Liquidity coverage ratio	19/6)		N.A.		88.32

Sufficiency of these static reports ...



These reports are compliant with local regulation and only for 30 days which is reported disparately throughout a year !!!

The prime directive of LCR in its very essence or purpose can't be satisfied this way.

What is missing?

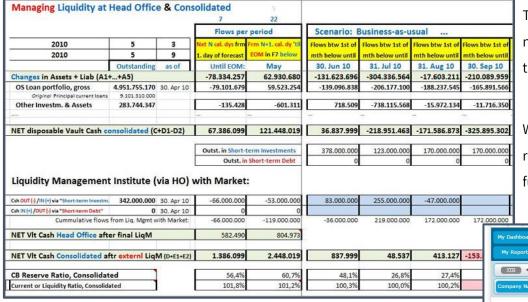
- 1 No modelling of volatility, seasonality, trend or stress
- 2 No modelling or understanding of cash flow dependency
- 3 No banded (limit response) policy for liquidity constraints

Without these additional components, the banking systems aren't any safer and even with them, how much safer can be anticipated. Structural change might be needed inline with the LCR reporting system.

Risk Appetite Reporting Solution



If you want to solve risk appetite problems use a risk dashboard



The reporting of funding liquidity has been a major feature of the new Basel III requirements but most banks are not going beyond the tabular reports that are being recommended.

While this shows compliance, it lacks an integration to policy response and it is this integration which will lead to improved funding liquidity management.

Dashboard reports will allow treasury, ALCO and risk management teams to see the types of problems they may be facing from market events along with their funding options.

Actions taken to change the liquidity profile should also be recorded.

Specific policy responses for treatment of liquidity 'states' or conditions should also be planned before a bank navigates itself into an illiquid position.



Recommended Risk Guidance



Setting Risk Appetite Statements without the framework is a FAIL

Risk Level Matrix							
LIKELIHOOD	CONSEQUENCE						
	Severe	Major	Moderate	Minor			
Almost Certain	Extreme	Extreme	Very High	High			
Likely	Extreme	Very High	High	Medium			
Possible	Very High	High	Medium	Low			
Unlikely	High	Medium	Low	Low			

A likelihood and consequence matrix must be developed for each risk assessment to define what each level of likelihood and each level of consequence means in relation to the objective against which the risk assessment is being conducted. This supports the practical application of the risk appetite statement below.

Risk Appetite

<Organisation Name> will not accept risks with a risk level of Very High or Extreme and requires all risks to be controlled so that no risk levels are greater than High.

Risk Escalation

When current risk levels are assessed as Very High or Extreme, the employee responsible for the objective against which the risks are identified, must notify/escalate this issue to the next level of management/governance. ie Team Leader, Manager, General Manager, CEO, Board.

It is expected that such notification will include detail on what is being done in response to the situation or what needs to be done to bring the risk level down to an acceptable level.

The sample Risk Appetite statement approach shown to the right is a TOTAL FAIL. It's a cut and paste of guidance that doesn't consider the context of the objectives for an organisation, it is based off a Risk Matrix that is being used to measure risks using methods that are not coherent.

Any statements around the risks being taken in this context are insincere and not useful for ascertaining whether a company is making informed choices that are inline with their chosen appetite for risk.

What is most disappointing is that this way to assess appetites for risk is very common, misleading and not helpful. I wonder why risk management departments bother at all.

Regulatory Interest

63

New Regulations as a consequence of failures during the GFC

- **a**) Establish a [**process for communicating**] the RAF across and within the financial institution as well as [**sharing non-confidential information**] to external stakeholders (e.g. shareholders, depositors, fixed income investors);
- **b**) be driven by [**both top-down board leadership**] and [**bottom-up involvement of management at all levels**], and embedded and understood across the financial institution;
- c) facilitate [embedding risk appetite] into the financial institution's [risk culture];
- d) [evaluate opportunities for appropriate risk taking] and act as a [defence against excessive risk-taking];
- e) allow for the risk appetite statement to be used as a tool to promote robust discussions on risk and as a basis upon which the board, risk management and [internal audit functions] can effectively and [credibly debate and challenge] management recommendations and decisions;
- **f**) be [**adaptable to changing business and market conditions**] so that, subject to approval by senior management and the board as appropriate, opportunities that require an [**increase in the risk limit of a business line**] or legal entity could be met while remaining within the agreed institution-wide risk appetite;
- **g**) cover [**activities**, **operations** and **systems**] of the financial institution that fall within its risk landscape but are outside its direct control, including subsidiaries and [**third party outsourcing suppliers**]; and
- **h**) be [**consistent with the principles**] in this document.

Financial Stability Board | 2013

Risk Appetite Statements

Risk Appetite Statements are a FAIL



FAILED

a) include key background information and assumptions that informed the financial institution's strategic and business plans at the time they were approved;

FAILED

b) be linked to the institution's short- and long-term strategic, capital and financial plans, as well as compensation programs;

PARTIAL

c) establish the amount of risk the financial institution is prepared to accept in pursuit of its strategic objectives and business plan, taking into account the interests of its customers (e.g. depositors, policyholders) and the fiduciary duty to shareholders, as well as capital and other regulatory requirements;

WORKABLE

d) determine for each material risk and overall the maximum level of risk that the financial institution is willing to operate within, based on its overall risk appetite, risk capacity, and risk profile;

WORKABLE

e) include quantitative measures that can be translated into risk limits applicable to business lines and legal entities as relevant, and at group level, which in turn can be aggregated and disaggregated to enable measurement of the risk profile against risk appetite and risk capacity;

COMPLEX

f) include qualitative statements that articulate clearly the motivations for taking on or avoiding certain types of risk, including for reputational and other conduct risks across retail and wholesale markets, and establish some form of boundaries or indicators (e.g. non-quantitative measures) to enable monitoring of these risks;

WORKABLE

g) ensure that the strategy and risk limits of each business line and legal entity, as relevant, align with the institution-wide risk appetite statement as appropriate; and h) be forward looking and, where applicable, subject to scenario and stress testing to ensure that the financial institution understands what events might push the financial institution outside its risk appetite and/or risk capacity.

Recommended Reading

Leading Risk Management Reading on Risk Appetite



Item	Publication	Published By	Link
1	Operational Risk Sound Practice Guidance	Institute of Operational Risk	LINK
2	Principles for An Effective Risk Appetite Framework	Financial Stability Board	LINK
3	Risk Appetite Frameworks spot the genuine article	Deloitte	LINK
4	Framework and challenge of practical implementation	Institute of Actuaries	LINK
5	Developing the Risk Appetite Framework	Institute of Actuaries	LINK
6	Risk Appetite Market Study	Grant Thornton	LINK
7	Risk Appetite Case Study for IT and Processing Centres	Causal Capital	LINK
8	Australian Risk Policy Risk Framework	Australian Risk Policy Inst	LINK

Author: Martin Davies

Risk Framework Architect | Causal Capital Banking | Markets | Corporate & Structured Finance

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