

1 Risk in perspective

- 1.1 Risk
- 1.2 A brief history of risk management
- 1.3 The regulatory framework
- 1.4 Why manage financial risk?
- 1.5 Quantitative Risk Management

1.1 Risk

- The Concise Oxford English Dictionary: “hazard, a chance of bad consequences, loss or exposure to mischance”.
- McNeil et al. (2005): “any **event or action** that may adversely **affect an organization’s ability to achieve its objectives** and execute its strategies”.
- No single one-sentence definition captures all aspects of risk.
For us: **risk = chance of loss** \Rightarrow uncertainty \Rightarrow randomness

1.1.1 Risk and randomness

- Kolmogorov (1933) introduced the notion of a **probability space** $(\Omega, \mathcal{F}, \mathbb{P})$:
 - ▶ Ω is the **sample space** which contains realizations $\omega \in \Omega$ (“state of nature”) of an experiment;
 - ▶ the **σ -algebra** \mathcal{F} contains all sets (“events”) to which we can assign probabilities; and
 - ▶ $\mathbb{P}(\cdot)$ denotes a **probability measure**.

- We will mostly model situations in which an investor holds today an asset with an uncertain future value.
- To this end, we model the value of the asset/risky position as a random variable $X : \Omega \rightarrow \mathbb{R}$. Several risky positions are modelled by a random vector $\mathbf{X} : \Omega \rightarrow \mathbb{R}^d$.
- Most of this modelling concerns the distribution functions

$$F_X(x) = \mathbb{P}(X \leq x), \quad x \in \mathbb{R}, \quad \text{and} \quad F_{\mathbf{X}}(\mathbf{x}) = \mathbb{P}(\mathbf{X} \leq \mathbf{x}), \quad \mathbf{x} \in \mathbb{R}^d,$$

of X and \mathbf{X} , respectively.

- If time matters, one can consider sequences of random variables $(X_t)_{t \geq 0}$, so-called stochastic processes.
- Our modelling tools will mainly come from probability and statistics.

1.1.2 Financial Risk

There are various **types of risks**. We **focus on**

Market risk Risk of loss in a financial position due to **changes** in the **underlying components** (e.g. stock/bond/commodity prices)

Credit risk Risk of a **counterparty** failing to meet its obligations (**default**), i.e. the risk of not receiving promised repayments (e.g. loans/bonds).

Operational risk (OpRisk) Risk of loss resulting from inadequate or **failed internal processes, people and systems** or from **external events** (e.g. fraud, fat-finger trades, earthquakes).

There are many **other types** of risks:

Liquidity risk (**Market**) **liquidity risk** is the risk stemming from the **lack of marketability of an investment** that cannot be bought or sold quickly enough to prevent/minimize a loss. **Funding liquidity risk** refers to the **ease** with which institutions can **raise funding**. The two often interact.

Underwriting risk In insurance, underwriting risk is the **risk inherent in insurance policies sold** (related, e.g. to natural catastrophes, political changes, changes in demographic tables).

Model risk Risk of using a **misspecified** (inappropriate) **model** for measuring risk. This is **always present** to some degree!

Good risk management (RM) has to follow a **holistic approach**, i.e. all types of risks and their interactions should be considered.

1.1.3 Measurement and management

Risk measurement

- Suppose we hold a **portfolio** of d investments with weights w_1, \dots, w_d . Let X_j denote the change in value of the j th investment. The **change in value – profit and loss (P&L)** – of the portfolio over a given **holding period** is then

$$X = \sum_{j=1}^d w_j X_j.$$

Measuring the risk now consists of determining the *distribution function* F (or functionals of it, e.g. mean, variance, α -quantiles $F^{\leftarrow}(\alpha) = \inf\{x \in \mathbb{R} : F(x) \geq \alpha\}$).

- To this end, we need a properly calibrated joint model for $\mathbf{X} = (X_1, \dots, X_d)$. Statistical estimates of F or one of its functionals are obtained based on historical observations of this model.
- Good risk measurement is essential (for good RM). For any product sold, the underlying risks need to be properly quantified and clearly communicated to stakeholders. The 2007–2009 crisis saw numerous violations of this principle (e.g. through collateralized debt obligations).

Risk management

- What is RM? Kloman (1990) writes:

“To many analysts, politicians, and academics it is the management of environmental and nuclear risks, those technology-generated macro-risks that appear to threaten our existence. To bankers and financial officers it is the sophisticated use of such techniques as currency hedging and interest-rate swaps. To insurance buyers or sellers it is coordination of insurable risks and the reduction of insurance costs. To hospital administrators it may mean “quality assurance”. To safety professionals it is reducing accidents and injuries. In summary, RM is a discipline for living with the possibility that future events may cause adverse effects.”

⇒ It is about ensuring resilience to future events.

- Note that financial firms are not passive/defensive towards risk, banks and insurers actively/willingly take risks because they seek a return. RM thus belongs to the core competence of a bank or insurance company.
- What does managing risks involve?

- ▶ Determine the capital to hold to absorb losses, both for *regulatory purposes* (to satisfy regulators) and *economic capital* purposes (to survive as a company).
- ▶ Ensuring portfolios are well diversified.
- ▶ Optimizing portfolios according to risk-return considerations (for example, via derivatives to hedge exposures to risks, or *securitization*, i.e. repackaging risks and selling them to investors).

1.2 A brief history of risk management

1.2.1 From Babylon to Wall Street

Academic innovation in the 20th century

- Markowitz (1952): *Theory of portfolio selection*; Desirability of an investment was decided upon a *risk-return diagram* (x-axis: *standard deviation*; y-axis: expected return). An *efficient frontier* determined the optimal return for a given risk level.
- Late 20th century: *Theory of valuation for derivatives* (important milestone for quantifying and managing financial risk)
- Black and Scholes (1973): *Black–Scholes–Merton formula* for the price of a European call option (Nobel Prize 1997)
- Harrison and Kreps (1979), Harrison and Pliska (1981): *Fundamental theorems of asset pricing* (arbitrage-free/completeness conditions)
- By 1995: Nominal values outstanding in *derivatives*: tens of trillions.

Disasters of the 1990s

- Growing volume of derivatives in banks' trading books (often not appearing as assets/liabilities in the balance sheet).
- 1995 Barings Bank ruin: OpRisk losses + *straddle position* on the Nikkei (short in a call and put; allows for a gain if Nikkei does not move too far down or up) + Kobe earthquake = loss of \$1.3 billion
- 1998 Long-Term Capital Management (LTCM): hedge fund; losses due to derivatives trading, required a \$3.5 billion bail-out to prevent collapse; M. Scholes and R. Merton (Nobel Prize winners 1997) were principles.
- Life insurer Equitable Life: Prior to 1988 Equitable Life had sold pension products which offered the option of a guaranteed annuity rate of 7% at maturity. In 1993, current annuity rate fell below the guarantee rate and policyholders exercised their options. Equitable Life faced an enormous increase in their liabilities (not properly hedged). By 2001, Equitable Life was underfunded by around £4.5 billion.

The turn of the century

- 1996–2000: *dot-com bubble*; Nasdaq index climbed from around 1000 to around 5400; many firms contributing to this rise belong to the *internet sector*. Within one year, the *Nasdaq fell by 50%*.
- During this time, *financial engineers discovered securitization* (bundling and repackaging of risks into securities with defined risk profiles that can be sold to investors).
- Different types of assets were transformed into *collateralized debt obligations (CDOs)*. Credits were given to *borrowers with low credit ratings*. CDO issuance volume by 2008 was around *\$3 trillion*, for *credit default swaps (CDS)* around \$30 trillion.
- *CDSs were used by investors to speculate* on (changing) credit risk.
- The *consensus* was that all this activity was a *good thing*:
 - ▶ *International Monetary Fund (IMF)*, April 2006:

“... dispersion of credit risk by banks to ... investors, rather than warehousing such risks on their balance sheets, **has helped to make** the banking and overall **financial system more resilient.**”

► **CEO of AIG Financial Products**, August 2007:

“It is **hard** for us, without being flippant, **to even see a scenario** within any kind of realm of reason **that would see us losing one dollar** in any of these transactions.”

- **Not all** of the **risk** from CDOs was **dispersed**, **large banks held alot of it** themselves (see Acharya et al. (2009)):

“Starting in 2006, the CDO group at **UBS** noticed that their risk-management systems treated **AAA securities** as essentially **riskless even though they yielded a premium** (the proverbial free lunch). So they decided to hold onto them rather than sell them! After holding less that \$5 billion of them in 02/06, the CDO desk

was warehousing a staggering \$50 billion in 09/07. ... Similarly, by late summer of 2007, Citigroup had accumulated over \$55 billion of AAA-rated CDOs."

The financial crisis of 2007–2009

- US house prices began to decline in 2006 and 2007.
- Subprime mortgage holders (having difficulties in refinancing their loans due to higher interest rates) defaulted on their payments. Starting in late 2007, this led to a rapid reassessment of the riskiness of securitization and losses in the value of CDOs. Banks were forced into write downs of the value of these assets on their balance sheets.
- The most serious crisis since the 1920s resulted:
 - ▶ March 2008: Bear Stearns collapsed; was sold to JP Morgan Chase
 - ▶ September 2008: Lehman Brothers filed for bankruptcy (⇒ worldwide panic, markets tumbled, liquidity vanished, many banks near collapse)

- ▶ September 2008: **AIG** (insuring the default risk in securitized products by selling CDS protection) got into **difficulty** when many of the **underlying securities defaulted** ⇒ needed an **emergency loan** of **\$85 billion** from the Federal Reserve Bank of New York.

Governments had to bail companies out by injecting capital or acquiring their distressed assets (e.g. US TARP = Troubled Asset Relief Program).

- **Mathematicians/financial engineers were also blamed** due to the failure of pricing models for complex securitized products, e.g. by **F. Salmon** (Wired Magazine, 2009-02-23, "**Recipe for disaster: the formula that killed Wall Street**"). The formula was the **Gauss copula model** and its application to credit risk was **attributed to David Li**.
- **Mathematicians had also warned about securitization** (see, e.g. Frey et al. (2001)). **Political shortsightedness**, the **greed of market participants** and the **slow reaction of regulators** had all contributed.

Recent developments and concerns

- The financial crisis led to **recession** and sovereign **debt crises**.
- **High Frequency Trading (HFT)** has raised concerns among regulators, triggered by such events as the **Flash Crash of 2010-05-06**.
- Trades are executed by computer (algorithms) in fractions of a second (**no testing**), computer centers are build near stock markets for faster trading. One **casualty** of algorithmic trading: **Knight Capital Group** (financial services firm) lost \$460 million due to trading errors on 2012-08-01.
- Ongoing concern: **Systemic risk**, i.e. the **risk of the collapse of the entire financial system** due to the propagation of financial stress through a network of participants. The **networks are complex**. Besides banks and insurance companies they **contain largely unregulated hedge funds and structured investment vehicles** ("shadow banking system"). One **important theme** is the **identification of systemically important financial institutions (SIFIs)** whose failure might cause a systemic crisis.

1.2.2 The road to regulation

- Main **aim of regulation**: Ensure that financial institutions have **enough capital to remain solvent**.
- Robert Jenkin (member of the Financial Policy Committee of the Bank of England, 2012-04-27):

“Capital is there to **absorb losses from risks we understand** and **risks we may not understand**. Evidence suggests that **neither risk-takers nor their regulators fully understand the risks** that banks sometimes take. That’s why banks need an appropriate level of loss-absorbing equity.”
- *Basel Committee of Banking Supervision (BCBS)*: Committee established by the Central-Bank Governors of the Group of Ten (G10) in 1974. The Basel Committee **does not have legal force but it formulates** standards/best practices/**guidelines**, the *Basel Accords*, in the expectation that individual authorities will take steps to implement them.

The first Basel Accord (Basel I)

- Issued in 1988
- Only addressed credit risk
- Fairly coarse measurement of risk
 - ▶ Claims were divided into 3 categories only, counterparties being governments, regulated banks and others;
 - ▶ Risk weighting identical for all corporate borrowers, independent of their credit rating;
 - ▶ Unsatisfactory treatment of derivatives.

The birth of VaR

- 1993: G30 (international body of leading financiers and academics) published a seminal report addressing for the first time so-called off-balance-sheet products, e.g. derivatives. The banking industry saw the need for proper measurement of these risks.

- At JPMorgan the famous *Weatherstone 4.15 report* asked for a *one-day, one-page summary of the bank's market risk* to be delivered to the CEO in the late afternoon (hence the "4.15").
- *Value-at-risk (VaR)* as a market risk measure was born and the JPMorgan methodology (which became known as *RiskMetrics*), set an industry-wide standard.
- Banks pushed to be allowed to use *netting* (compensation of long versus short positions on the same underlying)
- Amendment to Basel 1 in 1996 \Rightarrow *standardized model* for market risk and *internal* value-at-risk-based *models* for more sophisticated banks
- Coarseness problem for credit risk remained (not enough incentives to diversify credit portfolios; regulatory capital rules too risk insensitive).

The second Basel Accord (Basel II)

- Initiated in 2001, document published in June 2004.

- **Three pillar concept:** 1) quantification of regulatory capital; 2) regulatory review of the modelling process; 3) disclosure requirements.
- Important themes were:
 - ▶ Under Pillar 1, banks are allowed to use a more risk-sensitive approach for assessing credit risk of their portfolios (they could opt for an *internal ratings-based* approach which permitted the use of credit-rating systems.
 - ▶ Operational risk was introduced as a new class of risk).
- Due to the financial crisis of 2007–2009, further amendments to the 2004 version were made, which delayed the implementation of Basel II.

Basel 2.5

- CDOs had opened up opportunities for regulatory arbitrage (transferring credit risk from the capital-intensive banking book to the less-capitalized trading book).

- Some **enhancements to Basel II** were proposed **in 2009** with the aim of **addressing the build up of risk in the trading book**. These enhancements, known as **Basel 2.5**, include a **stressed VaR** (calculating VaR from data for a 12-month period of market turmoil) and the **incremental risk charge** (estimate of default/migration risk of unsecuritized credit products in the trading book). There were also specific new rules for certain securitizations.

The third Basel Accord (Basel III)

- 2011: **Five extensions** of Basel II and 2.5 were proposed:
 - 1) **Measures to increase the quality and amount of capital** by **changing** the definition of **key capital ratios** and **allowing countercyclical adjustments** to these ratios in crises;
 - 2) A **strengthening of** the framework for **counterparty credit risk** in derivatives trading with **incentives to use central counterparties** (exchanges);

- 3) Introduction of a **leverage ratio to prevent excessive leverage** (technique to multiply gains/losses; often by buying more of an asset with borrowed capital);
 - 4) Introduction of **various ratios** that **ensure** that banks have sufficient **funding liquidity**;
 - 5) Measures to force **systemically important banks (SIBs)** to have **even higher risk capital**.
- Basel III **works alongside Basel II and 2.5**, not replacing it. Its targeted end date of implementation is **2019**.

Parallel developments in insurance regulation

- **More fragmented**, much less international coordination of efforts.
- **Exception: Solvency II** framework in the **European Union (EU)**.
- Overseen by **EIOPA (European Insurance and Occupational Pensions Authority)**, but implementation is a matter for national regulators.

- **US: Insurance regulation is a matter for state governments.** The **National Association of Insurance Commissioners (NAIC)** provides support to insurance regulators from the individual states (helps to promote best practices etc.; early 1990s: NAIC promoted the concept of risk-based capital (RBC), a rule-based (rather than model-based) method of measuring the minimum amount of capital appropriate for supporting overall business operations depending on size and profile).
- After the 2007–2009 crisis: **2010 Dodd–Frank Act** (creation of a **Federal Insurance Office** to “monitor all aspects of the insurance sector” and the **Financial Stability Oversight Council (FSOC)** “charged with identifying risks to the financial stability of the United States”)

From Solvency I to II

- **Solvency I** came into force **in 2004**: Rather **coarse rules-based framework** calling for companies to have a ***minimum guarantee fund*** ⇒ Single,

robust system, **easy to understand**, **inexpensive to monitor**. However, it is **mainly volume based** and **not explicitly risk based**.

- **Solvency II** was **initiated in 2001** (publication of the Sharma report); adopted by the Council of the European Union and the European Parliament in November 2009; **application** of the framework from 2016-01-01.
- The process of **refinement** of the framework is **managed by EIOPA** (conducts a series of **quantitative impact studies (QIS)** in which companies have tried out aspects of the proposals; information about the impact and practicability of the new regulations results).
- **Solvency II goals**: strengthen the **capital adequacy** by **reducing** the possibilities of **consumer loss or market disruption** in insurance
⇒ **policyholder protection** and **financial stability** motives

Swiss Solvency Test (SST)

- Specific to [Switzerland](#).
- Already developed and [in force since 2011-01-01](#).
- Implements its [own principles-based risk-capital regulation](#) for insurers.
- [Similar to Solvency II](#), but differs in its treatment of different types of risk. Also puts [more emphasis on the development of internal models](#).
- The implementation of the SST belongs to the responsibilities of the [Swiss Financial Markets Supervisory Authority \(FINMA\)](#).

1.3 The regulatory framework

1.3.1 The Basel framework

The three-pillar concept (Basel Committee)

- Pillar 1 *Minimal capital charge*. Requirements for the calculation of the *regulatory capital* to ensure that a bank holds sufficient capital for its market risk in the trading book, credit risk in the banking book and operational risk (main quantifiable risks).
- Pillar 2 *Supervisory review process*. Local regulators review the checks and balances put in place for capital adequacy assessments, ensure that banks have adequate regulatory capital and perform stress tests of a bank's capital adequacy.
- Pillar 3 *Market discipline*. Addresses better public disclosure of risk measures and other RM relevant information (banks are required to provide better insight into the adequacy of their capitalization).

Credit and market risk; banking and trading book

- Banking activities are organized around the *banking book* (assets on the balance sheet held to maturity, at historic costs (*book value*)) and the *trading book* (assets held that are regularly traded; marked-to-market every day) reflecting the different accounting practices for different kinds of assets.
- Credit risk is mainly identified with the banking book; market risk with the trading book.
- The distinction is somewhat arbitrary and depends on “available to trade”. There can be incentives to move instruments from one book to the other (often from the banking to the trading book) to benefit from a more favourable capital treatment (e.g. regulatory arbitrage).

The capital charge for the banking book

- The credit risk of the banking-book portfolio is assessed as the sum of risk-weighted assets (RWAs) (i.e. linear combination of notional exposures weighted by risk weights reflecting the creditworthiness of the counterparty)
- The capital charge is determined as a fraction (*capital ratio*) of the sum of risk-weighted assets in the portfolio. The capital ratio was 8% under Basel II, but will be increased for Basel III in 2019.
- To calculate risk weights, banks use either the *standardized approach* (risk weights prescribed by regulator) or one of the more advanced *internal-ratings-based (IRB) approaches*.
- Under the IRB approaches banks may make an internal assessment of the riskiness of a credit exposure, expressing this in terms of an estimated annualized *probability of default (PD)* and an estimated *loss-given-default (LGD)*, which are used as inputs in the calculation of

risk-weighted assets. The total sum of risk-weighted assets (RWAs) is calculated using formulas specified by the Basel Committee, which also take positive correlation into account.

- IRB approaches allow for increased risk sensitivity in the capital charges compared with the standardized approach. Note, however, that the IRB approaches do not permit fully internal models of credit risk in the banking book (they only permit internal estimation of inputs to a model specified by the regulator).

The capital charge for the trading book

- For **market risk in the trading book** there is also a standardized approach. However, most **major banks** use an *internal VaR model approach*.
- **VaR calculation is the main component** of risk quantification, **but Basel 2.5 added**:
 - ▶ *Stressed VaR*: Banks are required to carry out VaR calculations based on their **models being calibrated to a historical 12-month period of financial stress**.
 - ▶ *Incremental Risk Charge (IRC)*: Banks must calculate an **additional charge** based on an estimate of the 99.9% quantile of the one-year loss distribution **due to defaults and rating changes** (since default and rating migration risk are not considered otherwise).
 - ▶ *Securitizations*: **Exposures** to securitizations in the trading book **are subject to new capital charges**.

The capital charge for OpRisk

There are *three options* of increasing sophistication. Under the *basic-indicator* and *standardized approaches* banks may calculate their OpRisk charge using simple formulas *based on gross annual income*. Under the *advanced measurement approach* banks may develop *internal models* (most are based on internal and external historical data).

New elements of Basel III

The *main changes* will be (may change before final implementation):

- Banks will need to hold *more* and *better quality* capital (*the latter* is achieved through a more *restrictive definition of eligible capital*, *the former* relates to *Basel II's 8%* + a *capital conservation buffer of 2.5%* of risk-weighted assets + a *countercyclical buffer of up to 2.5%*)
- A *leverage ratio will be imposed* to put a floor under the build-up of excessive leverage (*leverage* will be measured through the *ratio of Tier 1*

capital to total assets; a minimum ratio of 3% is currently being tested).

- A charge for *counterparty credit risk* is included. When counterparty credit risk is taken into account in the valuation of an OTC derivative contract, the default-risk-free value has to be adjusted by an amount known as the *credit valuation adjustment (CVA)*.
- Banks will become subject to *liquidity rules*; this is a completely new direction for the Basel framework which has previously only been concerned with capital adequacy. A *liquidity coverage ratio (LCR)* will be introduced to ensure that banks have enough highly liquid assets to withstand a period of net cash outflow lasting 30 days. A *net stable funding ratio (NSFR)* will ensure that sufficient funding is available in order to cover long-term commitments (\geq one year).

Risk quantification may change: from VaR to ES.

1.3.2 The Solvency II Framework

Main features

- Solvency II also adopts a three-pillar system (Pillar 1: quantification of regulatory capital; Pillar 2: governance and supervision; Pillar 3: disclosure of information to the public)
- Under Pillar 1, a company calculates its *solvency capital requirement (SCR)* = amount of capital to ensure that the probability of insolvency over a one-year period is no more than 0.5% (referred to as a confidence level of 99.5%).
- The firm also calculates a smaller *minimum capital requirement (MCR)* = minimum capital to continue operating without supervisory intervention.
- For calculating capital requirements, a *standard formula* or an *internal model* may be used. Either way, a *total balance sheet approach* is taken (all risks and their interactions are considered).

- The insurer should have *own funds* (surplus of assets over liabilities) that exceed both the SCR and the MCR.
- Under Pillar 2, the company must demonstrate that it has a RM system in place and that this system is integrated into decision making processes.
- An internal model must pass the “use test”: It must be an integral part of the RM system and be actively used in the running of the firm. Moreover, a firm must undertake an ORSA (*own risk and solvency assessment*) as described below.

Market-consistent valuation.

- Assets and liabilities of a firm must be valued in a *market-consistent* manner. Where possible, actual market values should be used (*marking-to-market*).
- When no market values exist, models (consistent with market information) have to be calibrated (a process known as *marking-to-model*).

- Market consistent valuation of the liabilities of an insurer is possible if cash flows to policyholders can be replicated by a replicating portfolio of matching assets.
- If this is not possible (e.g. for mortality risk), valuation is done by computing the sum of a *best estimate of the liabilities* (basically an expected value) *plus a risk margin*.

Standard formula approach

- Insurers calculate capital charges for different kinds of risk within a series of *modules* (e.g. for market risk, counterparty default risk, life underwriting risk, non-life underwriting risk and health insurance risk)
- Within each module, capital charges are calculated with respect to fundamental risk factors (e.g. within market risk are interest-rate/equity/credit-spread risk). Capital charges are calculated by considering stress scenarios

on the value of net assets (assets – liabilities). The stress scenarios are intended to represent 1 in 200 year events (i.e. annual 0.5% probability).

- The capital charges for each risk factor are aggregated to obtain the module risk charge. Again a set of correlations is used to express the regulatory view of dependencies between the fundamental risk factors.
- The risk charges arising from these modules are aggregated to obtain the SCR using a formula that involves a set of prescribed correlations.

Internal model approach.

- On regulatory approval, firms can develop an internal model for the financial and underwriting risk factors.
- An internal model often takes the form of a so-called economic scenario generator (ESG) in which risk-factor scenarios for a one-year period are randomly generated and applied to determine the SCR.

ORSA (Own risk and solvency assessment)

- *ORSA* = Entirety of processes and procedures to identify, assess, monitor, manage, and report short and long term risks a (re)insurance company may face and to determine the own funds necessary to ensure the company's solvency at all times.
- *ORSA* (Pillar 2) is different from capital calculations (Pillar 1):
 - ▶ *ORSA refers to a process* (and not just an exercise in regulatory compliance);
 - ▶ *Each firm's ORSA is its own process* and likely to be *unique* (not bound by a common set of rules such as the standard-formula approach in Pillar 1; even firms using *internal models* under Pillar 1 *are bound to similar constraints*).
 - ▶ *ORSA goes beyond the one-year time horizon* (which is a limitation of Pillar 1); e.g. for life insurance.

1.3.3 Criticism of regulatory frameworks

- **Benefits of regulation:** Customer protection, responsible corporate governance, fair and comparable accounting rules, transparent information on risk, capital and solvency for shareholders etc.
- The following aspects have raised criticism:
 - ▶ **Costs and complexity** for setting up and maintaining a sound risk management system compliant with present regulations (PRA: in the UK, Solvency II compliance costs at least £3 billion. Regulation becomes more and more complex.
 - ▶ **Endogenous risk:** Regulation may amplify shocks. It can lead to risk-management herding (institutions all run for the same exit by following the same (perhaps VaR-based) rules in times of crisis and thus further destabilize the whole system).

- ▶ **Market-consistent valuation** (at the core of the Basel rules for the trading book and Solvency II) **implies that capital requirements are closely coupled to volatile financial markets.**
- ▶ **Highly quantitative nature of regulation:** **Extensive use of mathematical and statistical methods.** Lord Turner (2009) (Turner Review of the global banking crisis):

“The very complexity of the mathematics used to measure and manage risk, moreover, made it **increasingly difficult for top management** and boards to assess and exercise judgement over the risk being taken. Mathematical sophistication ended up not containing risk, but **providing false assurances that other** prima facie **indicators of increasing risk** (e.g. rapid credit extension and balance sheet growth) **could be safely ignored.**”
- ▶ **Can tighter regulation prevent a crisis** such as that of 2007–2009? **Rules are constantly overtaken** by financial innovation.

1.4 Why manage financial risk?

1.4.1 A societal view

- Society relies on the stability of the banking and insurance system. The regulatory process (from which Basel II and Solvency II resulted) was motivated by the desire to prevent insolvency of individual institutions and thus protect customers (*microprudential perspective*).
- The reduction of systemic risk has become an important secondary focus since the 2007–2009 crisis (*macroprudential perspective*).
- Most would agree that the protection of customers and the promotion of financial stability are vital, but it is not always clear whether the two aims are well aligned (e.g. might be good to let a company go bankrupt to teach other companies a lesson).
- This is related to systemic importance of the company in question (size and connectivity to other firms). Considering some firms as too big to

fail creates a moral hazard (should be avoided!) since the management of such a firm may take more risk knowing that it would be bailed out in a crisis.

- The interests of society are served by enforcing the discipline of risk management in financial firms, through the use of regulation. Better risk management can reduce the risk of company failure and protect customers and policyholders. However, regulation must be designed with care and should not promote herding, procyclical behaviour or other forms of endogenous risk that could result in a systemic crisis. Individual firms need to be allowed to fail on occasion, provided customers can be shielded from the worst consequences through appropriate compensation schemes.

1.4.2 The shareholder's view

- While *individual* investors are typically risk averse and should therefore manage the risk in their portfolios, it is not clear that risk management at the corporate level (e.g. hedging a foreign-currency exposure or holding a certain amount of risk capital) increases the value of a corporation and thus enhances shareholder value. The rationale for this is simple: if investors have access to perfect capital markets, they can incorporate RM via their own trading and diversification.
- The famous *Modigliani–Miller Theorem*, which marks the beginning of modern corporate finance theory, states that, in an ideal world without taxes, bankruptcy costs and informational asymmetries, and with frictionless and arbitrage-free capital markets, the financial structure of a firm (thus its RM decisions) is irrelevant for the firm's value.
- In order to find reasons for corporate RM, one has to “turn the Modigliani–Miller Theorem upside down”:

- ▶ RM can *reduce tax costs*.
- ▶ RM can be beneficial, since a company may have *better access to capital markets* than individual investors.
- ▶ RM *can increase the firm value* in the presence of *bankruptcy costs* (e.g. cost of lawsuits or liquidation costs), as *it makes bankruptcy less likely*.
- ▶ RM can reduce the impact of *costly external financing*.

1.5 Quantitative Risk Management

1.5.1 The Q in QRM

- We treat QRM as a quantitative science using the language of mathematics in general, and probability and statistics in particular.
- Mathematics and statistics provide us with with a suitable language and with appropriate concepts for describing financial risks.
- We also point out assumptions and limitations of the methodology used.
- We should also be aware that the regulatory system needs to be more vigilant about the ways in which models can be gamed.
- The Q in QRM is an essential part of the RM process. We believe it remains (if applied correctly and honestly) a part of the solution to managing risk (not the problem). See also Shreve (2008):
“Don’t blame the quants. Hire good ones instead and listen to them.”

1.5.2 The nature of the challenge

- Our approach to QRM has two main strands:
 - ▶ Put current practice onto a firmer mathematical ground;
 - ▶ Put together techniques and tools which go beyond current practice and address some of the deficiencies.
- In particular, some of the challenges of QRM are:
 - ▶ Extremes matter. There is the need to address unexpected, abnormal or extreme outcomes. Lord Turner (2009):

“Price movements during the crisis have often been of a size whose probability was calculated by models (even using longer term inputs) to be almost infinitesimally small. This suggests that the models systematically underestimated the chances of small probability high impact events ... it is possible that financial market movements are inherently characterized by

fat-tail distributions. VaR models need to be buttressed by the application of stress test techniques which consider the impact of extreme movements beyond those which the model suggests are at all probable.”

- ▶ Interdependence and concentration of risks. Risk is multivariate in nature, we are generally interested in some form of aggregate risk that depends on high-dimensional vectors of underlying risk factors. A particular concern is the dependence between extreme outcomes, when many risk factors move against us simultaneously.
- ▶ The problem of scale. A portfolio may represent the entire position in risky assets of a financial institution, but calibration of detailed multivariate models for all risk factors is impossible and hence any sensible strategy involves dimension reduction (i.e. identification of key risk drivers/features to be modelled, e.g. correlation in credit risk models).

- ▶ **Interdisciplinarity**. Ideas and techniques from **several existing quantitative disciplines** are drawn together. A combined quantitative skillset should include concepts, techniques and tools from **mathematical finance, statistics, financial econometrics, financial economics and actuarial mathematics**.
- ▶ **Communication and education**. A quantitative risk manager operates in an environment where **additional non-quantitative skills are equally important** (communication, market practice, institutional details, humility). A lesson from the 2007–2009 crisis is that **improved education in QRM is essential**; from the front office to the back office to the boardroom, **users of models and their outputs need to be better trained to understand model assumptions and limitations**.