

# **Credit Risk Programme**

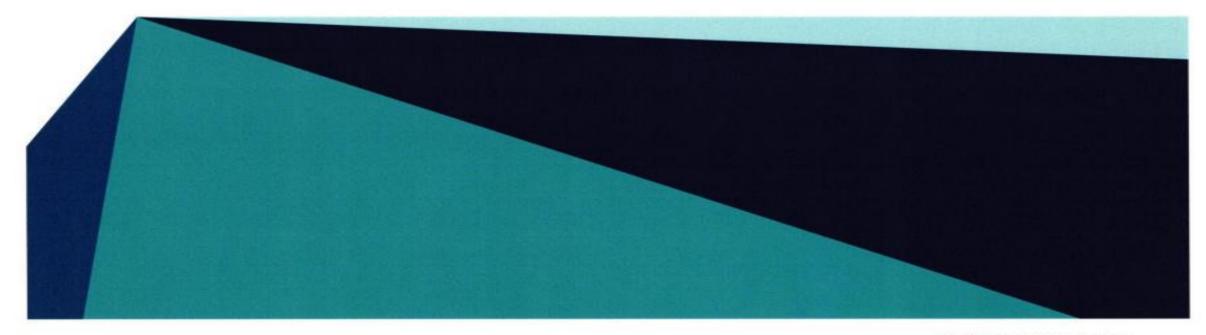
Module 12 Current Trends in Retail Lending





## CURRENT TRENDS IN RETAIL LENDING SENIOR MANAGEMENT RETAIL CREDIT RISK PROGRAM

22ND MARCH 2016







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- Revenue 2014: US\$13.0 BN
- Staff: 57,000
- · Clients in more than 130 countries
- Listed on the New York Stock Exchange



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#### Management, economic and brand strategy consulting

- Strategy
- Organization
- Operations
- · Risk management
- · Transformation management

#### Risk and reinsurance specialist

- Reinsurance and risk management
- Contract management, claims handling, and fiduciary accounting

#### Talent, health, retirement and investment consulting

- Personnel strategy
- · HR systems
- Compensation
- Incentive systems
- Communication

#### Insurance broker and risk advisor

- · Risk management, consulting, and transfer
- · Financial solutions and insurance program management services

- Revenue 2014 **US\$1.71 BN**
- Staff: 3,700
- 50+ offices in 26 countries

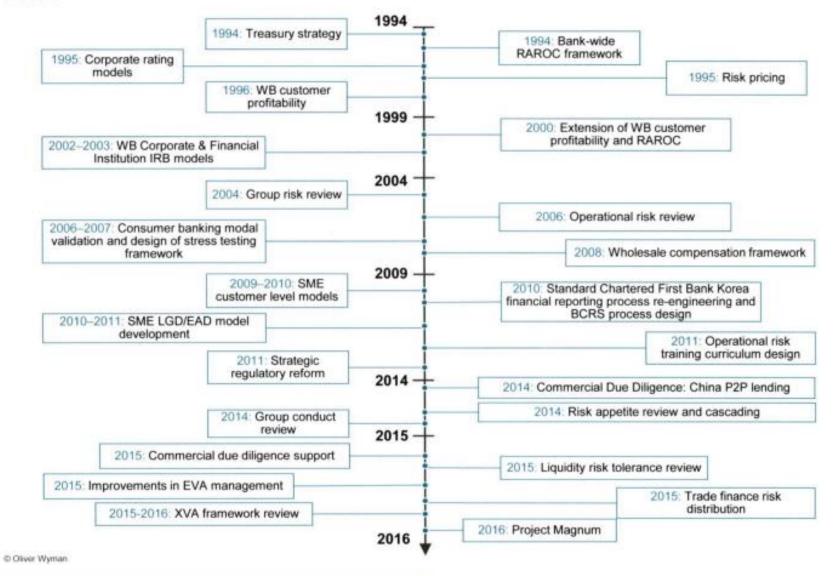
- Revenue 2014 US\$1.15 BN
- Staff: 2,300
- · Offices in over 50 countries

- Revenue 2014 US\$4.35 BN
- Staff: 20,500
- · Offices and operations in more than 130 countries

- Revenue 2014 US\$5.75 BN
- Staff: 26,000
- · Clients in over 130 countries



# We have partnered with Standard Chartered on multiple engagements since 1994





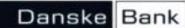
Our dedicated Retail Risk practice serves leading global/ regional banks on the full spectrum of retail risk issues

#### Selected recent clients

































#### Retail risk themes



Customer protection and conduct regulation



Digital shaping customer expectations and business models



Availability of new data and analytical capabilities



Focus on balance sheet optimization





Customer protection and conduct regulation



Digital shaping customer expectations and business models



Availability of new data and analytical capabilities



Focus on balance sheet optimization

- Conduct risk management and regulation as a response to the perception that financial services has "lost its way" in its ethics and principles
- Regulators clamping down on perceived 'unfair' dealings with unsophisticated/ vulnerable client groups
- Potential risk exposure across all product lines, customer segments and distribution channels
- STP will become the norm as customers increasingly expect "On demand" service, improved Customer Experience
- Digital technology enabling new business models, new entrants targeting unsecured lending to under-served segments
- · Risk capabilities need to address new expectations and enable innovation
- Data being captured in unprecedented volumes potential to leverage data from social media, mobile application usage and online footprint in credit decisions
- Web app technology has democratized software development and expanded possibilities
- The cloud, mobile devices and high bandwidth communication have broadened the occasions in which insights can be applied
- Full transparency on the use (liquidity, capital and leverage) and effectiveness (EVA) of financial resources
- Deep analytics supporting decision making at granular business unit, product, customer segment level
- RWA optimization: methodology/ computation; process; business strategy

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We see 8 key priority areas for new capability development spanning across retail credit value chain

### Conduct Digital Analytics Retail Risk top priorities across the retail credit value chain Optimization Portfolio Balance sheet Targeting Underwriting Collections management optimization 1. Conduct risk 2. KYC / Customer verification New products / business models – Marketplace Lending 4. New products / business models - Cash flow based lending 7. RWA and EVA-based analytical upgrade for transparency and 5. End to end digital credit process decision making 6. New data sources and analytical techniques

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8. Risk Organisation



Conduct risk management

Conduct risk management and regulation is in part a response to the perception that financial services has "lost its way" in its ethics and principles

Key findings from a recent survey of UK and US finance professionals

30%

had observed wrongdoing in the workplace

32%

feel pressured to compromise standards due to incentive structure 20%

would commit a crime (insider trading) if they could get away with it

25%

believe that unethical/illegal conduct is needed for success

32%

find the current regulatory regime effective

Source: Labaton Sucharow

#### Key things to know about Conduct Risk

- Encompasses product suitability and performance, treating customers fairly, mis-selling, market conduct and anti-competitive behaviour
- Many markets clamping down on perceived "unfair" dealings with unsophisticated/vulnerable client groups
  - All retail banking/insurance clients
  - Municipalities, SMEs, public sector, HNWs
  - Retail investors at asset management firms
- Potential risk exposure across all product lines, customer segments and distribution channels
- Cross-functional challenge across front line, operational risk, compliance etc.
- Regulators are increasingly demanding evidence at board level and below about active Conduct Risk management



## In the retail space, there are multiple risk areas that may require increased attention

Retail areas most impacted by Conduct Risk

### Client suitability/ mis-selling

Needs-based assessments in sales processes

Bundled solutions (esp. insurance cover)

Incentive structures

Robo-advice through algorithms not humans

Complex product structures

Social media interactions

> Inbound/ outbound call monitoring

Accreditation to demonstrate staff competencies

Source: Labaton Sucharow

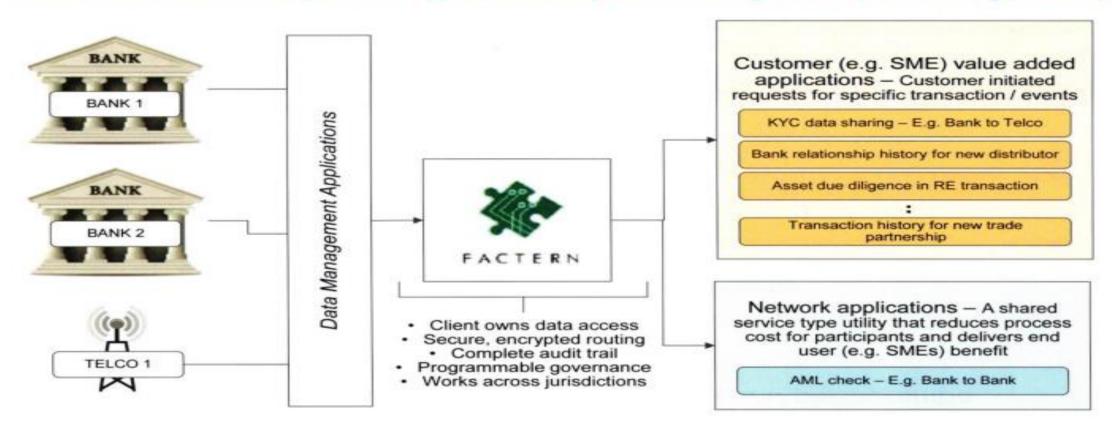
#### Thoughts for the CEO agenda

- Can you/your board explain the biggest conduct risks and what is being done about them?
- Do you know the risks embedded in your back-book?
- · Can your sales force define who a vulnerable client is?
- How robust are training and incentive mechanisms to conduct scrutiny?
- How is culture evolving to embed appropriate conduct?
- Have you set standards for good conduct of business?
   Who is monitoring this?
- How do you prevent Conduct creating yet another 2nd line of defence layer? How will you incorporate this into existing responsibilities?



"Open data" environment and customer privacy concerns are shaping new ideas on industry data sharing – OW has been early mover (via Factern)

Illustrative overview of "Open data" application ecosystem including Factern (Data sharing platform)



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# Various players are developing innovative approaches to customer verification process – leveraging new technology and partnerships

Past 5 days' location

of the phone

Stated residential/work address

#### Type of platform Shared Individual / Bi-lateral amazon New technology **MasterCard** Deployed voice recognition to improve contact center experience and efficiency Trialling new technology allowing customers to pay online · Voice authentication within first 30 seconds of by taking a selfie call. Multiple mechanisms can be used in conjunction (e.g. voice + fingerprint + secure token) Key feature uanateman NUMBER26 DOOW Indonesian start-up digital lender partners with local Partnership telco for innovative address verification German bank Number 26 uses IDnow technology for digital personal identification checks and electronic signatures Phone number

Verification

· Verifies identity of customers and enables

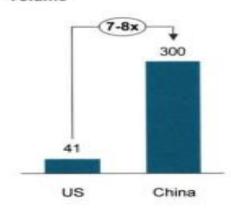
digital contract signing < 5 minutes



### We see five primary impacts the FinTech disruption can have for banks

Revenue pool growth e.g. China P2P Lending

US vs China's P2P market 2014, RMB BN, transaction volume



- Focus of banks on lending to SOEs at expense of private sector
- Lack of alternative investment products for retail customers

Margin Compression (e.g. price aggregators)

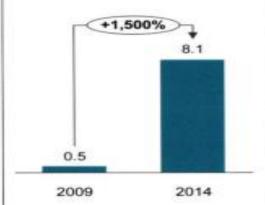
Price comparison website



Provides comparison of rates and charges for personal loans and credit cards

 Greater transparency and more convenient access to multiple quotes that improve price competitiveness Revenue pool shifts e.g. China e-Payments

3rd party internet payments RMB TN, 2009–2014



- Payments sector relatively unregulated, limited barriers
- Chinese millennials comfortable with digital technology, less trust in banks
- Payments highly transactional service with limited customer relationship/loyalty

Cost reduction e.g. Distributed ledger

Potential savings from distributed ledger technology

\$15-20BN1

Cost savings around

- Cross-border payments
- Securities trading
- Regulatory compliance

- Payments infrastructure highly complex – numerous counterparties at each end of transaction
- Cross-border payments as high friction service – settlement requires multiple days

Reduced risk e.g. better underwriting

Advanced underwriting abilities



Aggregates much broader set of data than traditional bank lending to make informed decisions

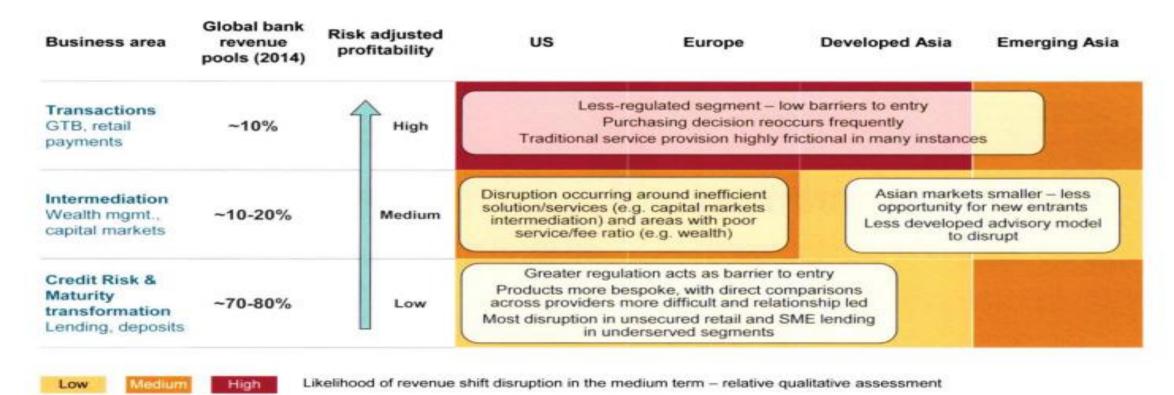
 Technology enables aggregation of diverse and unconnected sets of data

Oliver Wyman & Santander innoventures: Fintech 2.0

3. New products and business models - Marketplace lending

# Payments currently witnessing most significant disruption, particularly in Western markets, but pockets of disruption emerging across broad range of banking activity including Retail Lending

Potential revenue disruption by bank revenue pool and geography



Source: Oliver Wyman proprietary data and analysis



### A proliferation of attackers offering unsecured lending to under-served segments

#### Balance sheet lenders









Market place – MSME focused













### Market place - Individual focused















#### Aggregators













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3. New products and business models - Marketplace lending

### Example: Conditions in China facilitated dramatic growth in Marketplace Lending

SOEs choking off credit to MSMEs

Limited alternatives to bank borrowing

Search for yield

4 deposits

MSME financing gap ->\$700 BN (by 2018)

Investible assets - >\$2.3 TN (by 2018)

#### An increasingly web savvy population

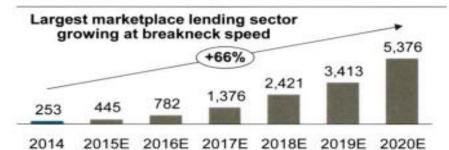
5.5x

Growth in broadband penetration over the last 10 years 36%

Share of adult population using smartphone in China

#### Favourable regulatory framework

- Overseen by CBRC as "Financial institutions" vis-à-vis SEC as an exchange in US
- CBRC has provided clear guidance on what these platforms can and can not do (10 principles)



Primarily funding MSMEs

96% Of all loans are given to MSMEs

Primarily funded by retail investors

98% Of funding is currently coming from retail

Fragmented competitive landscape with few large player and many small ones

V



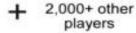








Top 5 market share 70% +





3. New products and business models - Marketplace lending

### StanChart needs to prepare for potential disruptors throughout its network

- 1 Does your market have a large unmet credit need in individual or Micro SME segments?
- 2 Is there a large share of affluent/mass affluent or institutional deposits in deposits but seeking higher yield?
- Has there been an exponential rise in smartphone and online penetration?
- Is there a regulatory policy shift towards support for Micro SMEs/unbanked?
- Is there an open-minded and pragmatic regulatory attitude towards innovation?



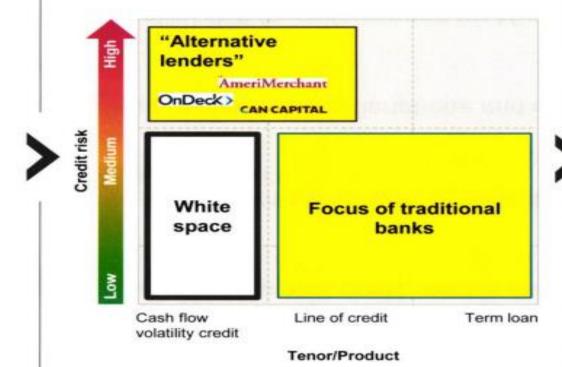
4. New products and business models - Cash flow based lending

# Unmet client needs present a "White space" in SME credit, necessitating a novel solution – cash flow based loans

#### SME customers face significant challenge in predicting cash flows

- Underlying drivers of cash flow variability:
  - Delays in buyer payments
  - Emergency repair/ replacement
  - Discounted purchase opportunities
- >40% of ASEAN SMEs disclosed they find cash flow projections very challenging – in an Oliver Wyman survey conducted in 2015

# Supply gap in addressing SME cash flow volatility credit need



#### A novel solution powered by superior credit analytics

- Short and small: Avg. loan size of \$50 K for 3 months
- Delivered in 1–3 days with minimal manual process (often limited to site inspection)
- Credit underwriting based on largely automated policy rules and decision engine
- Risk managed via daily deductions and extensive early risk indicators



4. New products and business models - Cash flow based lending

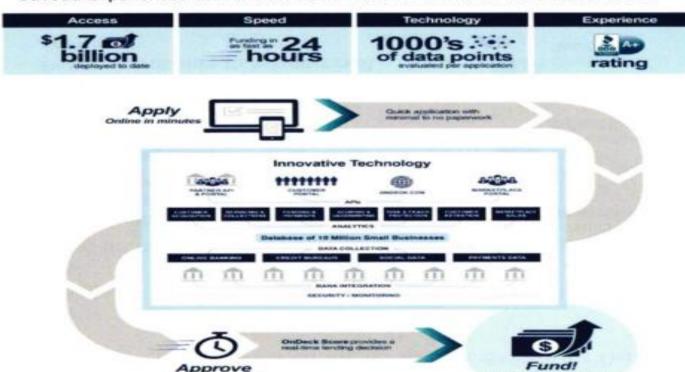
Cashflow based lending is a significant opportunity but requires banks to develop crucial new capabilities throughout the end-to-end activity chain

## OnDeck>

- · SME loan approval and funding in < 24 hours
- Uses data aggregation and algorithm
- Founded in 2006, \$1.3 BN at its IPO in 2014

Rapid response

· Caveat: Experienced severe decrease in value since March 2015 due to losses



#### Key capabilities

- Fast, easy and convenient application
  - Online application
  - Automated data collection
- · High level of automation
  - Applications made online
  - Credit decision and pricing done automatically
  - Only manual moment is document / fraud checks
- Early warning signals
  - Credit decision based on upto-date cash flow
  - Faster repayments as they are done daily
  - Ability to monitor sales data in real time for early identification of risk for losses



5. End to end process digitization

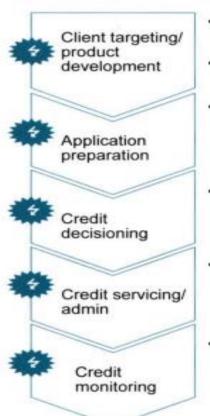
# A fundamental transformation in capabilities is necessary to remove hassles across various points of SME credit activity chain

Disguised OW client example

#### Client context

- · Leading UK bank with global operations
- Need to revamp strategy to transform operating model and differentiate credit underwriting process
  - Challenging macro environment: increased defaults and muted demand
  - Regulatory changes: increased funding costs and capital requirements
  - Political pressure to support real economy
  - Business model: decreased profitability of ancillary products and cost pressure
  - Competition: Increased institutional investor appetite

#### Typical activity chain in SME credit and interventions

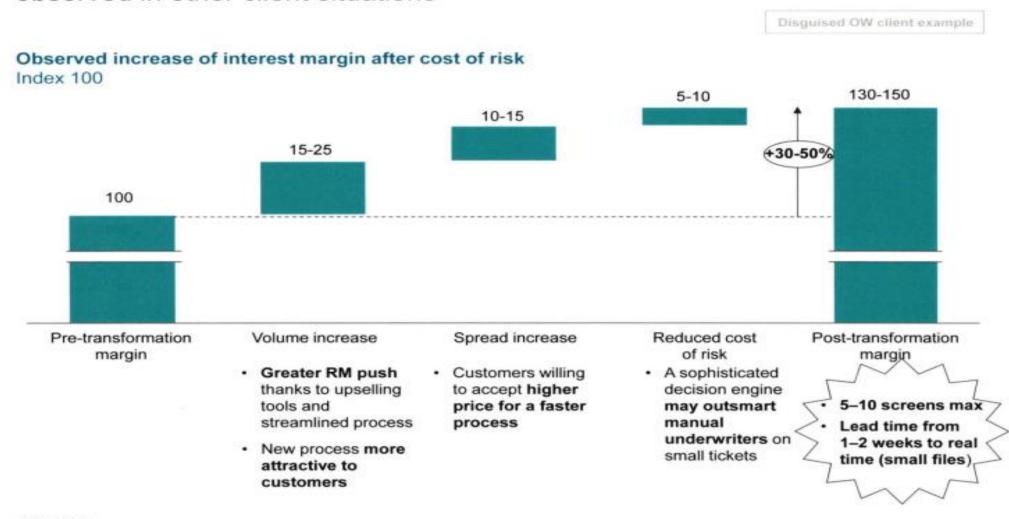


- Improved accessibility of policies via dedicated intranet site
- Enhanced overall KYC operating model through IT design and RM training
- Developed best-in-class electronic platform linking every product to specific client account and generate automatic pricing
- Automated credit assessment and decision through a decision engine
- Developed forward looking rating approaches through pro-forma simulation
- Usage of electronic flow tools to monitor the end-to-end credit process



5. End to end process digitization

# The case for change is persuasive given the economic impact we have observed in other client situations





6. New data sources and analytical techniques

# Technological developments and increasing digital footprint have led to availability of new data types / sources and analytical techniques

### **Expanding horizons of Retail Analytics**

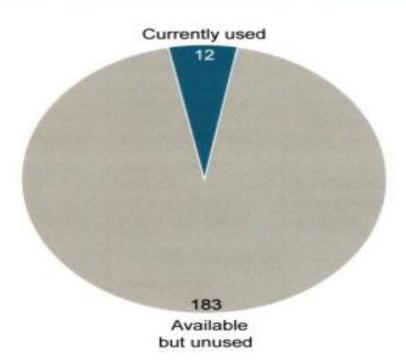
Traditional data Traditional 2.0 New sources of data Demographics / Account Transaction-level data. Social media. behaviour balance volatility, etc. Online footprint, etc. Traditional technique (e.g. logistic regression) Increasing frequency of digital interactions are creating new New analytical data sources and opening up techniques (e.g. new application points machine learning) Web app and cloud technology This has unlocked analytical has democratized software horse power necessary to access to data organization and analyze internal data that went analytics tools unnoticed until now



New data sources and analytical techniques

# Banks are only beginning to realize the value of data assets they are sitting on

In a comparable bank only 6% of the available, predictive features were used for decisions Client example (data used for decisioning and marketing)



Source: Oliver Wyman

A wide range of predictive data is available but unused due to the available analytical methods

Illustrative unused data types (non-exhaustive)

- Spend history correlation between spend patterns with repayment behavior
- Account organization inference of risk from patterns of account use and organization
- Sources of income inference of repayment ability
- Channel use implication of risk from banking frequency (e.g. >4 mobile log-ins per day indicative of high-level of financial awareness in under 30 yr. olds)
- Social groupings connections between borrowers (addresses, payments, etc.) can be used to identify lower risk social groups (e.g. members of high income families)
- Voice-to-text /call notes indication of financial health from customer phone call analysis (e.g. specific key words used)



6. New data sources and analytical techniques

# Large financial service providers are applying advanced techniques to leverage Traditional 2.0 data across a variety of applications

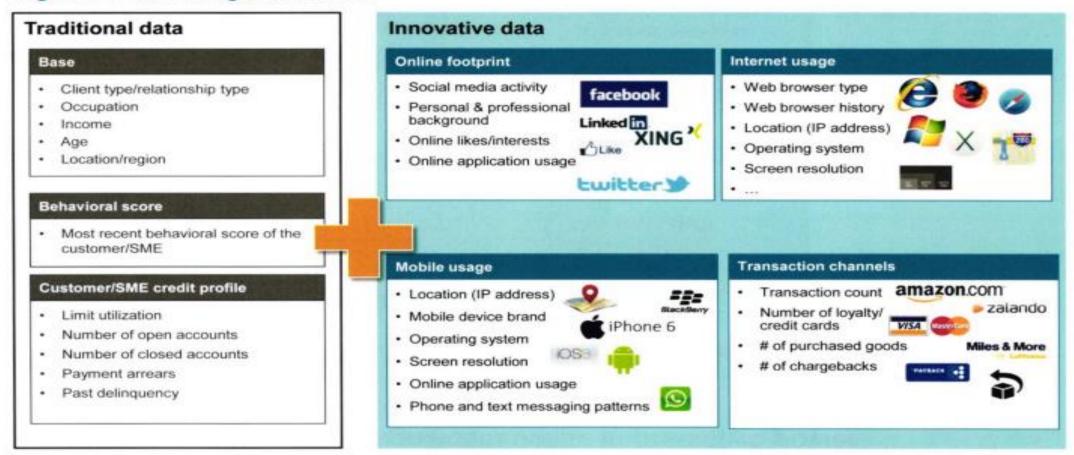
Firm	Capital One Son borcloycord	BANKING CROUP	<b>S</b> barclaycard	Zepo	Multinational Bank (Retail Collections
Application	Internal data use in CVM, digital marketing	Digital marketing, trigger-based	Pre-approvals	Advanced use of bureau data	Right party contact
Description	Advanced use of use of internal data in CVM incl. trigger-based Direct Mail campaigns and mobile channel targeting	Use of sophisticated rule-set that triggers marketing activities and next-best-action based on customer actions (e.g. transactions, branch visits, "Off-Us" activity, complaints)	Use of Group customer base group scoring to pre-approve customers for credit cards and personal loans.  Based on policy rules and customer behaviour (e.g. transactions)	Customer creditworthiness defined by credit score obtained from Equifax (credit bureau), using "quotation searches" (not credit applications)	Introduced "machine learning" to enhance collections process. This actively incorporates customer responses to collections activit to identify best means to attempt future contact



6. New data sources and analytical techniques

### In addition, a wide range of new data sources are becoming available

#### Big Data underwriting data sources





New data sources and analytical techniques

# Combination of unused existing data, new data and new analytical techniques are producing significant uplifts in predictive power

## Use case 1: Social media networks

Affluent customer targeting for a leading East European Bank 50K

"High value" prospects identified based on digital footprint information

## Use case 2: Online footprint data

Credit risk prediction with online footprint data – Leading European Bank 22% Increase in \*PD

Model" Gini

# Use case 3: Social media; online footprint

First payment default prediction – leading bank in Turkey 20%

Increase in "FPD model Gini

### Use case 4: Unstructured call centre data

"Big data" analytics in Collections – leading global bank 37% Fewer calls

27% Fewer agent contacts

21% Less handle time



7. RWA and EVA-based analytical upgrade for transparency and decision making

StanChart is moving towards Risk-Adjusted Performance Management, linking vision and strategy to key processes and decisions via common performance metrics which are risk-adjusted and have "bite"

### Topics of our recent work at Group level

Full cascading of Group risk appetite Development and use of EVA metrics Development and cascading of risk-adjusted performance criteria More detailed risk analysis as part of planning



7 RWA and EVA-based analytical upgrade for transparency and decision making

We helped SCB to develop an EVA framework which underlie the key principles of the risk-adjusted performance metrics

### **EVA** framework objectives

- 6. Trade offs: Support decisions regarding growth vs. retrenchment vs. "fixed cost" coverage
  - 5. Capital allocation: Encourage reallocation of underutilised capital

- 1. Delivery of strategic objectives:
- Support capital, RWA & cost optimisation
- EVA framework
- 4. Capital & return targets: Identify optimal path to achieving target ROE/ capital

- 2. Transparency: Inform true
- performance of the measured "entities"
- 3. Behavioural change: Forward looking management of risk and capital in business decisions

#### Use of the EVA framework

- The EVA will be used at Group level as part of regular performance management reporting
- Key management decisions require balanced, strategic considerations to which the EVA should contribute but not be the only input (e.g. accounting profit, leverage, brand considerations)



Core objectives

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7. RWA and EVA-based analytical upgrade for transparency and decision making

# The EVA framework aimed to enable key stakeholders to make informed strategic decisions

	CFO/ Group Finance	Global Segment Heads (e.g. CIB)	Regional Segment Heads (e.g. Retail)	Country Heads (e.g. Singapore CEO)
Uses	<ul> <li>Strategic country/ segment sustainability assessments</li> <li>Annual planning and budgeting process/ target setting</li> <li>Quarterly performance management</li> <li>Cross-group capital allocation</li> <li>Business model strategy (hub vs. spoke approach)</li> </ul>	<ul> <li>Annual strategic planning/ budgeting/ target discussions</li> <li>Strategic viability assessment of country coverage (within segment)</li> <li>Quarterly segment performance management</li> <li>Business model strategy (hub vs. spoke approach)</li> </ul>	<ul> <li>Annual strategic planning/ budgeting/ target discussions</li> <li>Strategic viability assessment of country coverage (within segment)</li> <li>Global/ regional client segment/ product strategy</li> <li>Quarterly segment performance management</li> </ul>	<ul> <li>Annual strategic planning/ budgeting/ target discussions</li> <li>Quarterly country performance management</li> <li>Segment performance assessment</li> <li>Booking hub vs. origination business model strategy</li> <li>Capital and Balance Sheet management</li> </ul>
	~	~	~	~
Decisions	<ul> <li>Grow/ transform/ retrench from countries</li> <li>Grow/ transform/ retrench businesses/ segments</li> <li>Inform group dividend/ capital issuance policy</li> </ul>	<ul> <li>Grow/ retrench from client segments and products</li> <li>Optimise capital (RWA) usage</li> </ul>	Grow/ transform/ retrench from countries     Grow/ transform/ retrench businesses/ segments	Grow/ retrench from segments in the market     Steer local portfolio composition (risk capital)     Upstream capital (e.g. group dividends policy)

<sup>1.</sup> IFRS adjusted local TCE. // 2. PRA RWA to be adjusted for major risks (e.g. concentration) in the medium term // 3. Global RWA/ ECAP based metric used for additional information



7. RWA and EVA-based analytical upgrade for transparency and decision making

Product/customer segment analytics reveal portfolio skews and quantify impact of cross-selling on customer level profitability

Disguised OW client example Example: Economic profit skew for Profitability (RORWA) by cross **RWA** optimisation mortgage customers in the portfolio product holding for mortgage customers **OPTIMISE** Only clients with >2 cross-**RWA CALCULATION** Value generators product holdings Decrease pricing to demonstrate positive ensure higher volumes economic profit and take-up RoRWA, Max EP: XX M BUSINESS SEGMENT **DRILL-DOWNS** Overall RORWA% Value destroyers Increase pricing up to EP breakeven or don't **ENHANCE GROUP** onboard # of cross-LEVEL PROCESSES product holdings Total EP: - XX M

We have a proprietary database of 300+ RWA optimization levers which could lead to 5-10% RWA savings even for banks which have already done a first pass

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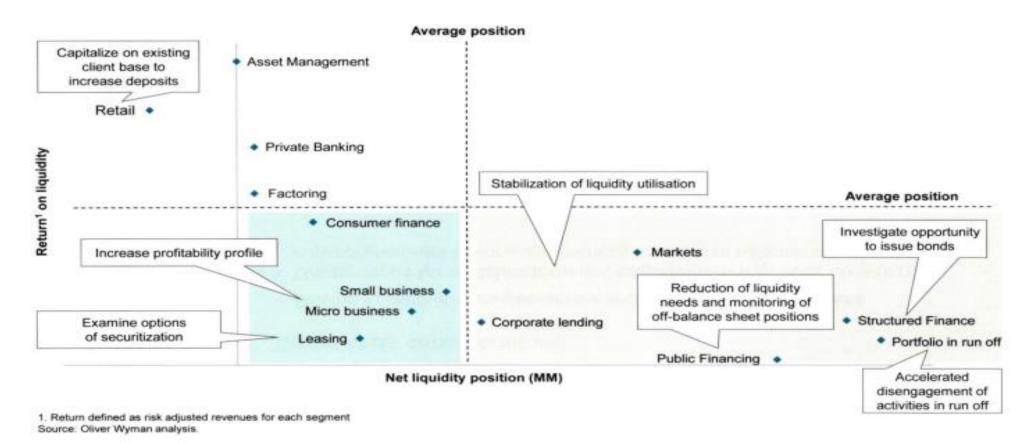


7 RWA and EVA-based analytical upgrade for transparency and decision making

# An understanding of the return on liquidity across business units would help banks to devise tactical funding strategies

Disguised OW client example - Universal Bank

#### Return on liquidity and funding balance by client segment





8 Risk Organisation

Given preceding developments, banks would need to consider how risk organizations should evolve to effectively address these changes

Key	themes	Target state considerations
1	Roles and responsibilities	<ul> <li>Moving towards a more pro-active and advisor role to business</li> <li>Greater need for collaboration and engagement with other units (e.g. collaboration with finance and strategy to optimize balance sheet)</li> </ul>
2	Processes	<ul> <li>Driving increasing automation of repeatable processes; leading to fundamental change in machine vs. manual work mix</li> </ul>
3	IT / Data infrastructure	<ul> <li>Move towards a centralised data lake, consolidating all data for big data analysis</li> </ul>
4	Talent management	<ul> <li>Shifting of profiles of risk staff towards deeper expertise on analytics, modern-day quants vis-à-vis seasoned underwriters</li> </ul>
5	Risk Culture	<ul> <li>Increasing involvement of risk in non-traditional areas (e.g. product design)</li> <li>Evolution of incentives and KPIs – more business performance linked</li> </ul>



# **Key Takeaways**

- Critically examine business for robustness against current/future. Conduct regulation, and embed appropriate conduct into culture and existing responsibilities.
- Be early mover to embrace trend towards "open data", industry KYC utilities, and innovative approaches to KYC to drive efficiencies and improve customer experience.
- Proactively engage regulators on their approach to innovation, new business models, data sharing, KYC requirements etc. to influence outcomes.
- Build new lending business models to meet unmet needs and defend against onslaught from Fintech attackers, or risk being marginalized in SME lending.
- Make retail analytics a competitive advantage by leveraging existing and new sources of data across the spectrum of retail lending activities.
- Re-design/ optimize credit processes end-to-end to deliver concrete margin uplift.
- Take action now to prepare for cascading to countries of more rigorous risk adjusted performance criteria
- . Future-proof risk organizations, with heavy focus on building analytics capability



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