## BAIN & COMPANY



## Nuova Definizione di Default – Supporto Audit

Numero Protocollo: 537/2018

Siena, Settembre 2018

#### Premessa

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- Alla fine del 2016, l'EBA ha pubblicato le Linee Guida sulla Nuova Definizione di Default (DoD) con l'obiettivo di armonizzare i criteri utilizzati per identificare le posizioni in default tra i vari Paesi membri
- Lo scorso 26 Giugno, la BCE ha inviato al Gruppo Montepaschi una lettera formale per lanciare l'implementazione della nuova Definizione di Default con go live entro il 1 ° gennaio 2021
- Nella stessa lettera BCE sancisce formalmente la necessità di un ingaggio dell'Audit nella verifica delle evidenze derivanti dall'application package previo invio al Regolatore (nel caso la Banca segua il "2 step approach")

- Come Bain, al fine di rappresentare anche in questa occasione un Vostro partner strategico, abbiamo predisposto il presente documento per condividere:
  - il **contesto normativo** di riferimento
  - i due possibili approcci implementativi ("2 Step" vs "1 single Approach") e gli elementi distintivi che li contraddistinguono
  - La proposta di assistenza progettuale Bain, con riferimento al ruolo dell'Audit



## Contesto di riferimento della nuova Definizione di Default

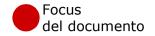
- Proposta di assistenza progettuale da parte di Bain
- Team Bain
- Referenze Bain

Alcuni trends "disruptive" stanno impattando profondamente sul modo di fare Banca e sul contesto competitivo delle Financial Institutions

#### TREND CHIAVE **DESCRIZIONE IMPLICAZIONI** DIFFICOLTA' NEL GENERARE VALORE Bassi tassi d'interesse → scenario a ATTRAVERSO BUSINESS MODELS tassi contenuti continua Contesto macro-COMMERCIALITRADIZIONALI economico • Eccesso di liquidità che continua ad essere RICERCA DI NUOVE FONTI DI REVENUES E una realtà per l'intero Sistema bancario PROFITTABILITA' Continua evoluzione framework IL REGOLATORE HA COMPLETATO IL QUADRO regolamentare: NORMATIVO SUL CREDITO PER ASSICURARSI - SREP Assessment IN FUTURO MODALITÀ DITRATTAMENTO E Credito IFRS9 CONTABILIZZAIZONE DEI CREDITI NPE Guidance - Calendar provisioning ALLINEATE E CERTE A LIVELLO EUROPEO Focus successivo Regulator New definition of default SPINTA VS. OPEN BANKING, MAGGIORE COMPETIZIONE E RIBUZIONE MARGINALITÀ Evoluzioni importanti anche sul mondo dei Altre DI ALCUNI SERVIZI FEE-BASED (E.G. normative pagamenti (PSD2) e del risparmio (MiFiD 2) PAGAMENTI, WEALTH MGMT) • La **Digitalizzazione** sta ormai impattando DE-BANCARIZZAZIONE SERVIZI i Financial Services a 360°: FINANZIARI (FINTECH E BIGTECH), - Differente customer experience AGILITÀ NELLATRASFORMAZIONE, Digitalizzazione Adozione di **nuove tecnologie** GESTIONE E VALORIZZAZIONE BIG DATA. Advanced analytics APPROCCIO CLIENTE - CENTRICO

Processi operativi evoluti

## Il Regulator sta rivoluzionando la gestione del credito nelle Banche



L'Addendum BCE si inserisce in un contesto regolamentare in forte evoluzione che sta portando, tra le altre cose, ad un potenziale aumento del costo del deterioramento del merito creditizio della posizione

#### Principali novità

#### Perimetro di applicazione

.

- Nuovi modelli di accantonamento e svalutazione:
  - Suddivisione portafoglio in 3 differenti Stage, differenziati in termini di livello / modalità di accantonamento
  - Adozione di modelli di Perdita Attesa multiperiodale

 Intero portafoglio creditizio, a partire dal 1 gennaio 2018

Nuova definizione di

**Default** 

IFRS 9

- Utilizzo coerente all'interno dell'UE dei criteri di default e aumento comparabilità stime di rischio / valore fondi propri
- Esposizioni past due e UTP, a partire dal 1 gennaio 2021
- Primo "application package" già a partire da fine 2018

- NPE Guidance e
  Prudential
  Provisioning
  Backstop
  (Addendum ECB)
- Declinazione **linee guida** su criteri chiave per la gestione **NPE** (assetti organizzativi, modalità detection, meccanismi monitoraggio, criteri valutativi, etc.)
- Utilizzo del concetto di "vintage" dell'esposizione deteriorata per l'applicazione dei backstop
- Adozione backstop su posizioni classificate a deteriorato dopo il 1 aprile 2018

# La nuova DoD introduce significativi cambiamenti rispetto alle attuali modalità di gestione, omogeneizzando definizioni e soglie di materialità

<u>Classificazione omogenea</u> a livello di Gruppo

<u>Nuove soglie e trigger</u> <u>Principali regole introdotte</u>

PAST DUE

> Per tuttí I segmentí credítízí

Soglie di materialità



- Entrambe le soglie, assolute e relative, devono essere superate simultaneamente per attivare il Default
- **Relativa**: ≤2,5% (Retail e Corporate)

Ogni Ente nazionale Competente può identificare una soglia all'interno del range 0 – 2,5%

- Attesa una sola soglia per il perimetro di applicazione del Single Supervisory Mechanism
- Al di fuori del perimetro SSM ogni autorità competente definirà una soglia
- **Assoluta**: ≤500€ (Corporate); ≤100€ (Retail)

Conteggio



 Il conteggio dei giorni di Past Due viene effettuato a livello di controparte complessiva e inizia quando entrambe le soglie vengono superate per 90 giorni consecutivi

Default Tecnici/ Compensazione

- Sono considerati Default Tecnici solo situazioni di PD causate da errori a livello di dati o malfunzionamenti dei sistemi IT
- Calcolo (con frequenza giornaliera) per controparte senza possibilità di compensazione, poiché l'ammontare dello sconfinamento viene determinato a livello di singola linea

Probation Period



• Minimo 3 mesi di osservazione prima di poter rientrare in uno stato di non default

UTP/ Bad Loans Armonizzazione dei trigger di UTP

- Armonizzazione dei trigger di "Unlikely to Pay":
  - **Sales of Credit Obligation** (UTP se la Perdita economica eccede il 5% dell'esposizione totale e viene sancita il deterioramento del rischio di credito)
  - **Distressed Restructuring** (UTP se il  $\Delta$ NPV del cash flows atteso eccede l'1% del valore preristrutturazione)

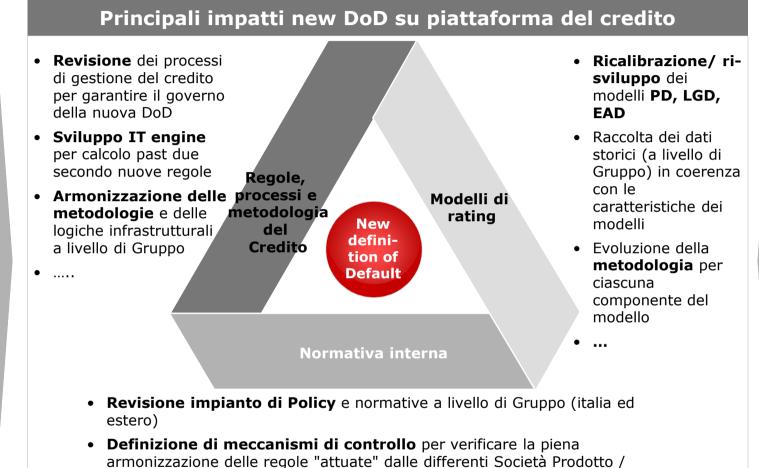
Probation period



• **Minimo 3 mesi di osservazione** (1 anno per le ristrutturazioni), prima di poter rientrare in uno stato di non default

## L'armonizzazione genererà effetti rilevanti su tutte le componenti "core" della piattaforma di gestione del credito / rischio

Pieno e continuo
confronto ed
allineamento del
Regolatore



Definizione di azioni / strategie per minimizzare gli impatti sul **Portafoglio** Crediti nel suo complesso e sul costo del rischio, al momento dell'adozione complessiva della normativa

LA COMPLESSITÀ DELL'IMPLEMENTAZIONE VA AFFRONTATA CON UN APPROCCIO OLISTICO, STRUTTURATO E COERENTE CHE PERMETTA AL GRUPPO DI ESSERE COMPLIANT E DI GESTIRE IN MODO "PROATTIVO"

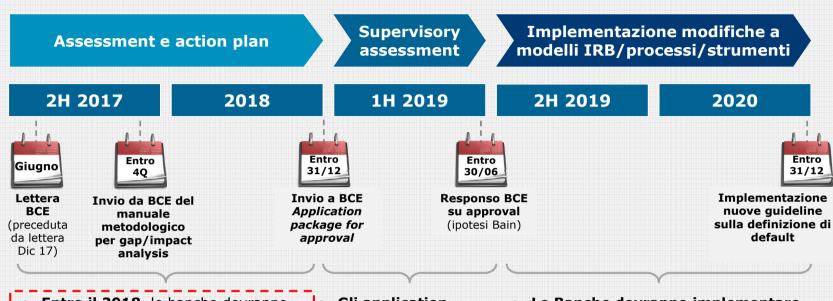
GLI IMPATTI ATTESI

Controllate

• Evoluzione delle anagrafiche di Gruppo

## BCE ha inviato alle Banche una lettera di ingaggio per l'avvio dei lavori propedeutici al recepimento dei nuovi requisiti normativi

- La BCE illustra il processo e declina le attività da completare per il corretto recepimento della nuova definizione di default
- La BCE suggerisce un approccio "Two-Step" per:
  - Garantire la transizione fluida al nuovo modello
  - Consentire la costruzione di serie storiche affidabili prima dell'aggiornamento dei sistemi di rating
- L'approccio "Two-Step" prevede:
  - Step 1: allineamento di processi, procedure e sistemi IT alla nuova DoD
  - Step 2: aggiustamento dei sistemi di rating per recepire
    - Nuova DoD
    - Altri regulatory requirement EBA IRB review2
    - Follow-up da altri temi (es.: TRIM)



- Entro il 2018, le banche dovranno inviare i seguenti template:
  - Registry
  - Gap analysis *Focus*

Focus prossima slide

- Impact analysis
- \_\_Action\_plan\_
- Review of the IT infrastructure
- Questi template devono essere inclusi nell'"Application package for model change"
- Gli istituti che optano per il 2-Step hanno 6 mesi per
  - condurre il Self Assessment sulle loro attuali DoD
  - Ottenere tutte le autorizzazioni interne
  - Ottenere l'opinione indipendente dell'internal audit sul Package
  - inviare il Package a BCE

Gli application
 package verranno
 esaminati dalla BCE
 adottando un

approccio uniforme tra i vari istituti

 Il grado di completezza e precisione delle analisi inciderà su possibili richieste aggiuntive da parte di BCE

- Le Banche dovranno implementare l'action plan approvato:
  - Adattando i propri processi di identificazione di default
  - Revisionando procedure e applicativi IT
  - Emanando nuove policy e normative di gruppo
- Per le banche che adottano sistemi IRB, eventuali cambiamenti ai propri modelli sulla definizione di default devono essere sottomessi a BCE per approvazione
- Tale submission dovrà avvenire durante la fase implementativa e coerentemente con le tempistiche di entrata in vigore della normativa

Alle Banche viene richiesto di inviare entro fine 2018 un application package contenente una analisi di dettaglio sugli impatti derivanti dai nuovi standard e una pianificazione chiara della messa a terra degli interventi

AI BLOCCHI LOGICI SOTTOINDICATI, BCE HA
PRESO IN CONSIDERAZIONE ANCHE LA
"REVIEW DELL'INFRASTRUTTURA IT"

**Gap Analysis** 

- Assessment sugli interventi necessari da operare ai processi, procedure e sistemi IT utilizzati per l'allineamento al nuovo processo di identificazione di Default
- La Gap Analysis dovrà essere svolta su ognuno dei singoli requisiti:
  - Soglie di materialità
  - Effetto propagazione
  - Default tecnico
  - Probation Period

- ..

#### **Impact Analysis**

- Stima degli impatti su:
  - Default rate
  - Parametri di rischio (es. PD, EL, LGD)
  - Assorbimenti di capitale (es. Cet1 ratio, total capital ratio)

**Action Plan** 

- Pianificazione di dettaglio del percorso implementativo finalizzato al recepimento degli standard tecnici definiti dalle GL
- Stima delle tempistiche necessarie per i diversi interventi, in coerenza con le tempistiche di entrata in vigore della normativa (31 dicembre 2020)

SI RICHIEDE ALLE BANCHE DI FORNIRE PRECISE EVIDENZE IN TERMINI DI GAP E IMPATTI, COSÌ COME UN DETTAGLIATO ACTION PLAN AL FINE DI MINIMIZZARE LA NECESSITÀ DA PARTE DEL REGOLATORE DI IMPLEMENTARE MISURE DI SUPERVISIONE ACCESSORIE

## Agenda

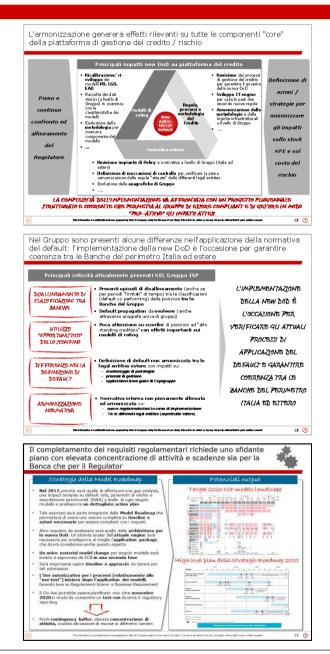
 Contesto di riferimento della nuova Definizione di Default

 Proposta di assistenza progettuale da parte di Bain

• Team Bain

• Referenze Bain

Obiettivo dell'intervento: attivazione di un programma specifico interfunzionale per raggiungere la piena compliance alle logiche della new Definition of Default con focus iniziale sull'assessment e l'action plan



Rilevanza del tema in oggetto, complessità realizzativa, numerosità di altre normative in corso di implementazione ed impatti potenziali richiedono una gestione "attiva" e strategica della nuova DoD per garantire il pieno governo delle nuove logiche e la mitigazione dei relativi "costi"

Logiche di intervento

### ATTIVAZIONE DI UN PROGRAMMA SPECIFICO INTER-FUNZIONALE

(con focus iniziale su Assessment & Action plan e successivamente su Past Due e Processi e impatti di Business La "New Definition of Default" definisce un nuovo set di regole per l'identificazione del default ed è un <u>enabler chiave</u> per la ristima dei parametri di Rischio (c.d. Model Roadmap)

#### **STREAM**

#### **DESCRIZIONE TEMATICHE CHIAVE**

#### • Assessment dei processi, delle procedure e dei sistemi IT di MPS vs quideline BCE • Stima (quali/quantitativa) degli impatti su Default rate, Parametri di rischio (es. PD, LGD) e **Application** assorbimenti di capitale (es. Cet1 ratio, total capital ratio) **Package** • Pianificazione di dettaglio del percorso implementativo, con relativa timeline, e prioritizzazione delle attività (inclusa stima di alto livello del budget pluriennale) • Preparazione dell'Application Package (5 documenti) da inviare al regolatore • Declinazione delle guideline in parametri oggettivi di input, alberi logici per il calcolo, e output Past due • Declinazione requisiti funzionali (motore di • Preparazione delle serie storiche degli ultimi 10 anni per la ricalibrazione dei modelli (es. supporto calcolo past DoD alla definizione di eventuali proxy, test del margine d'errore, etc.) due e data • User Acceptance Test degli sviluppi effettuati e rilascio set di dati per ricalibrazione modelli gathering) • Implementazione del motore di calcolo Past due • **Declinazione** delle sequenti tematiche chiave: - UTP Trigger (eq. Declinazione guideline in parametri oggettivi, dei requisiti funzionali per gli sviluppi IT relativi ai nuovi trigger UTP...) Processi / Early Warning (eq Eventuale revisione dei motori/indicatori di early waning e watchlist derivanti da nuova DoD) Impatti di Processi di detection (eq. Ricognizione dei processi di early detection del default...) business Impatti di Business (eg Declinazione di iniziative gestionali "tattiche" (i.e. senza interventi IT)) **Deployment Roll out**

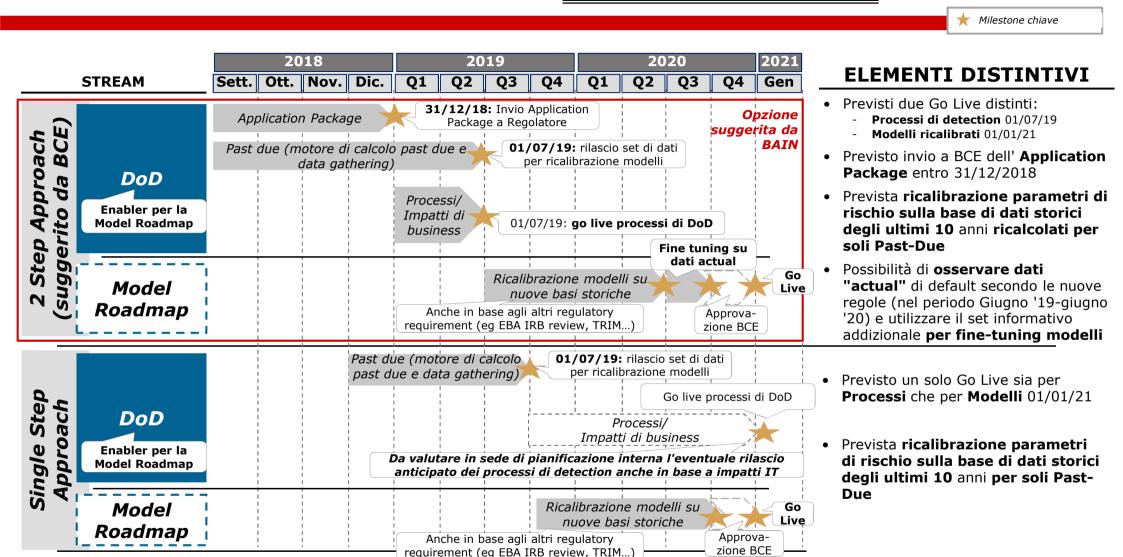
## oadmap Ricalibrazione

- Ricalibrazione modelli di Rating sulla base di dati storici degli ultimi 10 anni per soli Past-Due
- Fine-tuning modelli su dati actual sia Past Due che UTP con processi a nuovo solo nel caso di Two step approach

Ricalibrazione sistemi di rating anche alla luce degli altri regulatory requirement come EBA IRB review e TRIM

## Due approcci implementativi ("Two steps" vs Single step") per adequamento alla New DoD

NON CONSIDERATI EVENTUALI IMPATTI DA TRIM E DI ALTRI REGULATORY REOUIREMENT



L'approccio "two step" (suggerito da BCE), nonostante sia più lungo rispetto al "single step" di circa 3 mesi in quanto prevede una fase di fine tuning su dati actual all'interno della Model Roadmap, garantisce maggiore robustezza del modello

## Focus "2 Step Approach" Wave e obiettivi chiave

#### **OBIETTIVI**

#### ATTIVITÀ PRINCIPALI

Wave I (da settembre a dicembre 2018) Assessment dell'attuale impianto ed Action Plan delle iniziative da intraprendere

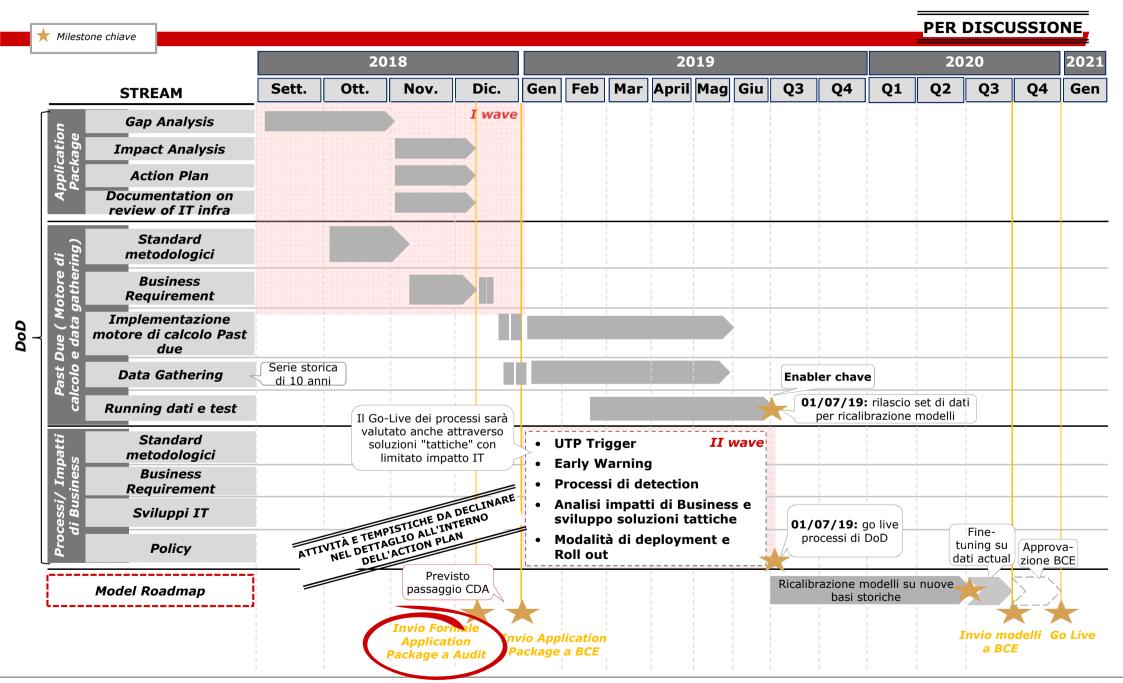
Focus su Past Due per abilitare la ricalibrazione dei modelli

- Messa a terra della Gap analysis finalizzata ad identificare gli interventi necessari fino al 2020 su processi, procedure e sistemi IT per l'allineamento al nuovo processo di identificazione di Default
- Declinazione di un Action Plan di dettaglio del percorso implementativo con relativa timeline, e prioritizzazione delle attività
- Declinazione delle **Guideline sul Past Due** in parametri oggettivi di **input**, **alberi logici** per il calcolo, e **output**
- Preparazione delle serie storiche degli ultimi 10 anni per la ricalibrazione dei modelli

Wave II (da gennaio a giugno 2019) Disegno e messa a terra processi (con estensione a tematiche UtP) per traguardare il Go live entro giugno 2019

- Declinazione UtP trigger
- Identificazione nuove evoluzioni su processi di detection e early warning
- Analisi potenziali impatti di business e possibile set di azioni mitiganti
- Declinazione modalità di deployment e meccanismi di Roll-Out per Go-Live processi a fine giugno 2019

## Focus "2 Step Approach": Possibile timeline progettuale (Wave I e II)



## Focus "2 Step Approach": Ingaggio della funzione Audit

#### **INGAGGIO DELLA FUNZIONE AUDIT**

#### • Il coinvolgimento della funzione Audit prevede un **ingaggio** differenziato nelle due wave progettuali

- Nel corso della Wave 1, si prevede un ingaggio principalmente volto al consolidamento ed alla presa visione di quanto presente nell'application package, oltre ad un check sugli standard metodologici ed i BR relativi ai motori Past Due
- Nel corso della Wave 2, l'obiettivo principale sarà invece la valutazione riguardo la corretta implementazione di quanto definito nella fase precedente

#### **AMBITO DI INTERVENTO AUDIT**

#### MACRO ATTIVITÀ



application package dipendente **Wave I** (set dic 2018)

Gap analysis

Impact analvsis

Action plan

infrastructure

metodologia e BR

- Presa visione e validazione interna del piano di lavoro complessivo dell'iniziativa
  - Deliverable identificati
  - Milestone principali
  - Coerenza con richieste BCE
- Verifica dell'assessment svolto sugli interventi necessari da operare a processi, procedure e sistemi IT
- Validazione dell'Impact analysis su Default rate, Parametri di rischio (es. PD, EL, LGD), Assorbimenti di capitale (es. CET1 ratio, TCR, ...)
- Verifica di coerenza dell'Action plan di dettaglio del percorso implementativo
- Validazione dell'impostazione complessiva dell'infrastruttura IT
- Verifica Business Requirement e standard metodologici per motore di calcolo Past Due e per data gathering

Focus successivo

Verifica motore di calcolo Past Due Wave II (gen giu

2019)

Convalida processi/ impatti di Business

**Validazione** 

per Past Due

**Model roadmap** 

- Verifiche finalizzate al go-live dei processi di detection il 01/07/19
  - Verifica test UAT (tecnici e funzionali) su motore di calcolo PD e data gathering, con focus su completezza test e output ottenuti
  - Interfaccia con COG per controllo su sviluppi infrastrutturali IT
- Convalida dei processi di detection e dell' analisi impatti di **Business**
- Costante aggiornamento della funzione Audit in merito alle evoluzioni dei sistemi di rating



## Focus "2 Step Approach": Ambiti di intervento Audit con supporto Bain: attività previste per la Wave 1

#### **APPROCCIO**

- Il rispetto degli stringenti tempi progettuali sarà possibile mediante un approccio «proattivo», che preveda:
  - Check costanti di coerenza delle singole attività vs. piano complessivo
  - Check intermedi con le funzioni di Business, anche relativamente a «package parziali» di deliverable
  - Tempestiva fornitura di feedback
- Bain & Company propone di supportare la funzione Audit nello svolgimento delle attività descritte

## AMBITO DI INTERVENTO AUDIT

#### ATTIVITÀ DI DETTAGLIO



- Pianificazione complessiva del progetto
- Presa visione e validazione interna del piano di lavoro complessivo dell'iniziativa
- Check su **deliverable** identificati ed eventuale segmentazione in «package parziali» per agevolare l'attività di revisione
- Verifica delle milestone e della coerenza con richieste BCE
- Verifica della pianificazione vs. model roadmap (nel continuo)



- Gap analysis
- **Verifica corretta ed esaustiva mappatura/ricognizione** processi, procedure e sistemi IT rilevanti nel processo di identificazione del Default
  - Verifica correttezza assessment su processi, procedure e sistemi IT mappati
  - Verifica capillarità della Gap Analysis su ognuno dei singoli requisiti: soglie di materialità, Effetto propagazione, DF tecnico, Probation Period, ...

## Opinione indipendente su application package

Impact analysis

Action

plan

- Verifica metodologia (incl. eventuale utilizzo di proxy) ed esaustività degli impatti stimati su:
  - Default rate
  - Parametri di rischio (es. PD, EL, LGD)
  - Assorbimenti di capitale (es. Cet1 ratio, total capital ratio)
- Check di affidabilità della pianificazione di dettaglio per traguardare il recepimento degli standard tecnici definiti dalle linee guida regolamentari
- Verifica delle tempistiche ipotizzate per i diversi interventi
- Presenza di «buffer» temporali per la gestione di eventuali imprevisti



- Check sulle evoluzioni destinate all'architettura IT, allo scopo di verificare:
  - Coerenza con i gap evidenziati, con gli impatti rilevati e con i tempi definiti dall'action plan
  - Verifica sulla flessibilità dei nuovi sistemi
  - Eventuale presenza di soluzioni quick win / di backup in caso di non rispetto dei tempi

Stesura documento • Formalizzazione evidenze in documento per invio al Regolatore previa approvazione CdA

#### Validazione metodologia e BR per Past Due

- Validazione degli standard metodologici in corso di elaborazione per il motore Past Due ed il data gathering
- Controllo su esaustività e coerenza complessiva dei Business Requirement in corso di stesura
- Determinazione/ aggiornamento eventuali impatti su gap/impact analysis e su IT infrastructure (nel continuo)

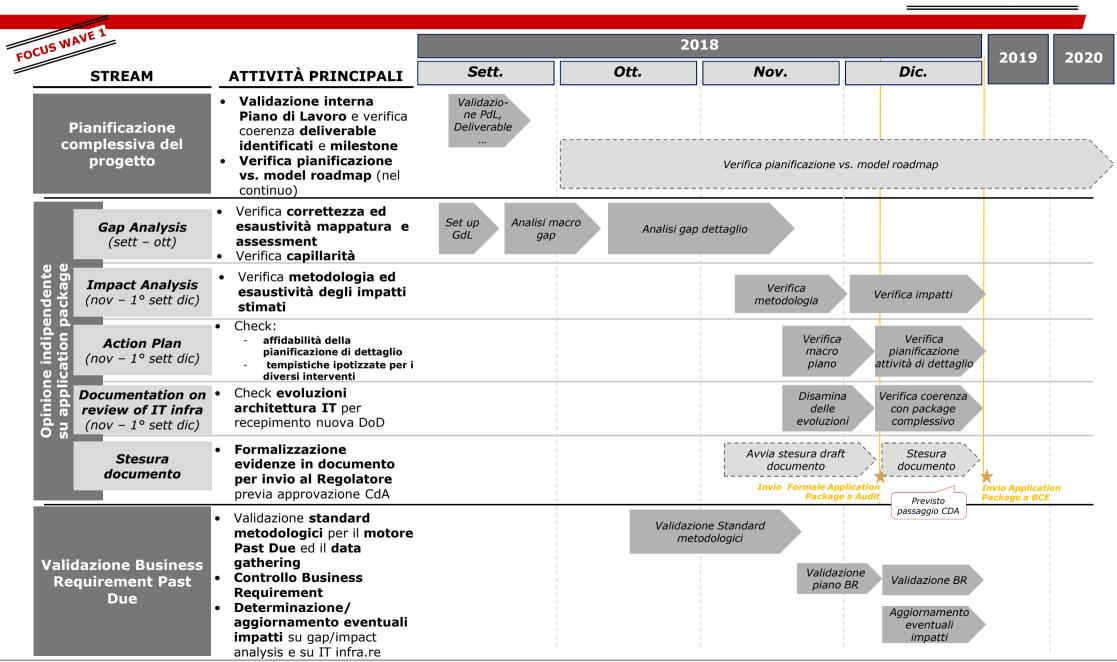
## Focus Wave I: Attività Audit - Proposta GANTT

## DEADLINE DA CONDIVIDERE ALL'INTERNO DEL GDL CRO/CLO

#### Sezioni dell'Application Package

(elapsed riferito a pianificazione attività progettuali ipotizzata)

#### **PER DISCUSSIONE**



## Agenda

- Contesto di riferimento della nuova Definizione di Default
- Proposta di assistenza progettuale da parte di Bain
- Team Bain
- Referenze Bain

# La presente proposta è stata declinata sulle <u>attività progettuali a</u> <u>supporto dell'Audit per la Wave 1</u>: Team Bain & Company e Referenti progettuali

## (1) VP di riferimento



Franco Baronio Partner (Milan Office)



Alessandro Odello Partner (Milan Office)



Marcello Pallotta Partner (Milan Office)

- Conoscenza pluriennale del Gruppo MPS
- Relazioni con senior/ top management
- Profonda esperienza su tematiche di:
  - New Definition of Default
  - NPE strategy
  - Assessment e revisione dei processi del credito
  - Allineamento macchina operativa a richieste regolamentari
  - Mercati finanziari
  - Operazioni Straordinarie



- Risorse senior dotate di significative esperienze pregresse su progetti similari su banche di dimensioni similari
- Team di consulenti selezionati in funzione di esperienze su progetti similari



Wave I (da settembre a dicembre 2018)

~2 consulenti/ Manager dedicati al progetto

## Agenda

- Contesto di riferimento della nuova Definizione di Default
- Proposta di assistenza progettuale da parte di Bain
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Perché Bain: grazie alla expertise distintiva sulla Nuova Definizione di Default e processi di gestione e monitoraggio del credito...

Expertise
distintiva su
modelli e
processi di
gestione e
monitoraggio
del credito

 Abbiamo una forte e consolidata practice/ expertise sulle tematiche relative a modelli e processi di gestione e monitoraggio del credito



 Abbiamo sviluppato un'esperienza consolidata con player nazionali sulla Nuova Definition of Default e sulle NPE Guideline che ci supporteranno nella fase di diagnostico e valutazione delle alternative



• Metteremo a disposizione un framework per la gestione strategica della Nuova Definizione di Default



...alla conoscenza del Gruppo MPS e alla capacità di fare squadra con il suo team, riteniamo di essere il "partner giusto"

Conoscenza del Gruppo MPS e frequente collaborazione  Abbiamo una conoscenza molto approfondita del Gruppo MPS e frequente collaborazione nel corso degli ultimi anni su progetti di prioritaria importanza (es. Sirio, Pelican, Programma di Deleverage UTP, Progetto Valorizzazione Private,...)



Capacità di "fare squadra" con il team MPS già testata sul campo

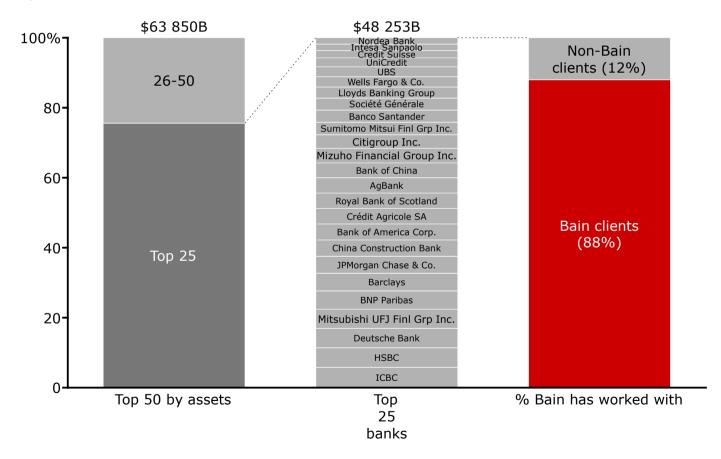
- Abbiamo sviluppato un rapporto consolidato con le strutture chiave Banca da coinvolgere per il successo dell'iniziativa (Crediti, Commerciale, Organizzazione, IT, ecc.); abbiamo un legame consolidato con le unità operative che ci potrà consentire di "fare squadra" in tempi rapidi con il team MPS
- Nel corso delle recenti attività progettuali abbiamo costruito un'ottima conoscenza dei processi e modelli del credito MPS e dei repository dei dati chiave per lo sviluppo del progetto; pensiamo di poter quindi ottimizzare i tempi di start up delle attività di progetto e di riuscire a gestire al meglio, nel tempi molto stringenti, le varie fasi progettuali



## Bain collabora inoltre con 22 delle 25 top Banche a livello globale

Bain's past work in banking credit and capital efficiency

Top 50 banks by assets globally (US\$B, 2012)

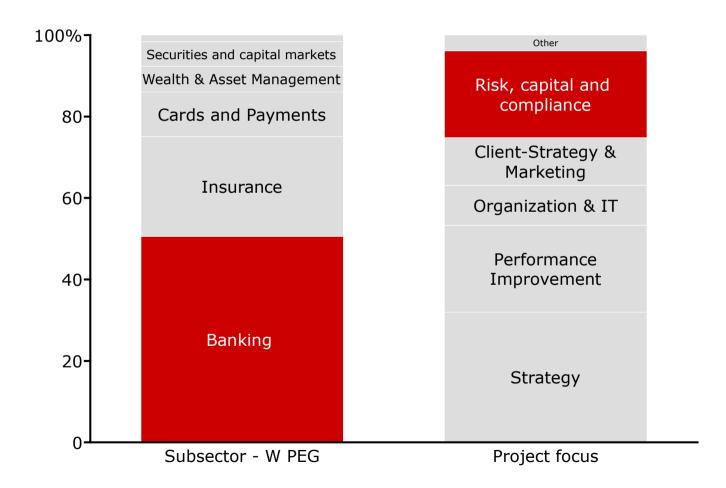


Source: SNL Financial, Bain GXC

Ha sviluppato una profonda esperienza nel risk management, e in ambiti capital e compliance...

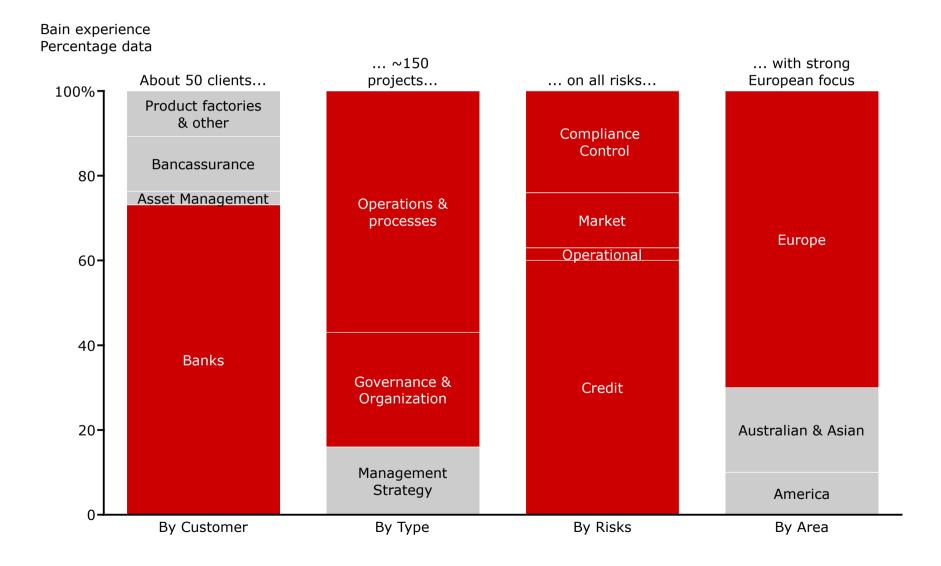
Bain's past work in banking credit and capital efficiency

% Financial Services Projects (2006-2015)



## ...con oltre 150 progetti di risk, capital and compliance in tutto il mondo

#### Bain's past work in banking credit and capital efficiency



## Bain Credentials – Risk management

Summary of Selected Cases

Bain competencies on selected rísk. managemen t cases and managing complexity

## Collection & recovery full potential

- Reduced client credit risk cost by implementing initiatives identified during diagnostic including:
  - Set up Process Performance Management system
  - Improving quality of customer contact details
  - Defining customer segments and assigning differentiated processes for each segment
  - Increasing efficiency of call centers
  - Streamlining refinancing process
- Results visible in Month 1
- More than 30% reduction on credit risk cost at the end of project
- **Results sustained** by client team after the project

#### **Basel II implementation**

- Defined and organized dedicated teams to facilitate information sharing and decision taking processes
- Defined a high level integration plan
- Defined actions to be taken and timelines required
- Developed a Program Management to foster transition processes
- Defined structures and teams
- Defined internal governance
- Defined the transition approach:
  - Identification of phases granting a gradual change
- Developed detailed definitions of actions to be implemented and related timelines for all kinds of risks (credit, operative, Pillar II)
- Proper fostering of processes and activities, through:
  - Meetings
  - Decision sharing
  - Commitment sharing

## Project Management Integration

- Defined overall project governance
- Identified separate working groups and progressive integration
- Defined New Basel II roadmap and project plan
- Developed diagnostic of internal models, processes and infrastructures within the two banks
- Identified choice of "best practices" within the two projects and consequent alignment
- Managed project of IT integration involving Basel II infrastructure
- Reported to the top management

## Bain Credentials - Risk management

**Summary of Selected Cases** 

Bain
competencies
on selected
risk
managemen
t cases and
managing
complexity
(2/2)

#### Risk management

- Managed project for compliance with Basel II requirements:
  - Internal models development: rating, credit risk mitigation, fair value, LGD, customer segmentation
  - Use of risk metrics in Bank's processes
  - Documents arrangement and relationship with regulator
  - Data collection process for Regulator requirement
- Designed, implemented and coordinated a complex and articulated project structure
- Developed and followed up a detailed project planning
- Analyzed the level of coverage of new rating models
- Identified and activated potential action to increase the coverage
- Estimated the potential benefits for the client related to the application of a Basel II IRB approach

## Risk Management and PMO

- **Project management** of the Italian Group Basel 2 compliance path:
  - Developing and updating project plans
  - Ensuring project scheduling and quality
  - Managing priorities with project
- Direct support to vertical work streams:
  - Impact analysis on commercial and credit processes deriving from new rating models adoption
  - Contribution to the identification of target processes/models
  - Relationships with both Italian and French regulators
  - Data collection process for regulatory requirements
- Designed, implemented and coordinated a complex and articulated project structure
- Analyzed potential impact on credit portfolio and on credit and commercial processes
- Designed roll-out plan for the new Basel 2 tools
- Provided direct support in the models roll out process

## NPL management (SCT – AF)

- Performed full diagnostic to understand situation and status of portfolio
- Mapped key processes with suggested improvements in each major segment of the value chain
- Determined collection plan to tackle non-performing loan segment of the portfolio
- Designed new initiatives to improve the quality of new loans and improve status of the portfolio
- Jointly developed recovery plan that featured 25% recovery of NPLs and presented to the shareholders
- Numerous Bain recommendations adopted by the client and implemented in this year's plan including:
  - Setup of automatic payment measures and drive customers towards them
  - Refinement of organization structure and setup of call center to handle beneficial customers
  - Split leasing approval decision from dealership's sales team
  - Adopt risk-based pricing model
  - Improve management of repossessed vehicles
  - Setup training programs for collectors

## Retail Bank Co - Collection & recovery full potential

#### **CLIENT SITUATION**

- Leading bank in Argentina facing negative economic context
- Products portfolio mainly composed of credit cards and non-secured loans

• Increasing credit risk cost over the last years

**ISSUES** 

 Prior Bain diagnostic identified several opportunities to improve recovery process and reduce risk

#### **BAIN CONTRIBUTION**

- Reduced client credit risk cost by implementing initiatives identified during diagnostic including:
  - Set up Process Performance Management system
  - Improving quality of customer contact details
  - Defining customer segments and assigning differentiated processes for each segment
  - Increasing efficiency of call centers
  - Streamlining refinancing process

- Results visible in Month 1
- More than 30% reduction on credit risk cost at the end of project
- **Results sustained** by client team after the project



## Italian Bank Co - Basel II implementation

#### **CLIENT SITUATION**

- Client is a leading Italian Bank, working on retail and corporate businesses
- After and integration plan for a recently acquired smaller bank was defined, problems in processes and IT systems integration came out:
  - Different processes and procedures for the data gathering
  - Different kinds of clients' information storing
  - Different IT systems

#### **ISSUES**

- Client needed to structure an implementation plan for the operative integration according to the new parent company policies
- Client wanted to avoid a "break-through" and assure a gradual transition period to the acquired Bank

#### **BAIN CONTRIBUTION**

- Defined and organized dedicated teams to facilitate information sharing and decision taking processes
- Defined a high level integration plan
- Defined actions to be taken and timelines required
- Developed a **Program Management** to foster transition processes

- Defined structures and teams
- Defined internal governance
- Defined the transition approach:
  - Identification of phases granting a gradual change
- Developed detailed definitions of actions to be implemented and related timelines for all kinds of risks (credit, operative, Pillar II)
- Proper fostering of processes and activities, through:
  - Meetings
  - Decision sharing
  - Commitment sharing



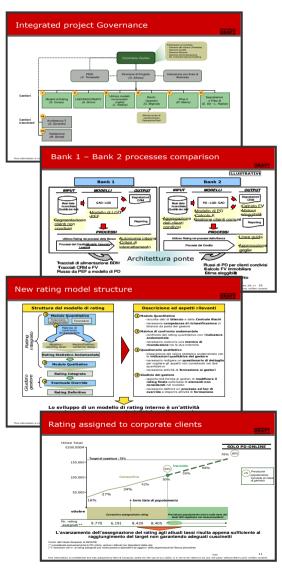
## Italian Bank Co - Project Management Integration

#### **CLIENT SITUATION**

- · Client is a major Italian Banking Group
- Following a merger with a leading Italian bank, the Client wanted to integrate the two existing Basel II projects and develop a unique roadmap

#### **ISSUES**

- Client wanted to identify the "state of the art" of Basel II implementation within the two banks and answer the following questions:
  - What are the possible ways to integrate the two projects?
  - Which are **main interventions** required?
  - Which are the best existing models, processes, infrastructures?
  - Which is the **timing** to complete Basel II compliance process for the whole Group?



#### **BAIN CONTRIBUTION**

- Defined overall project governance
- Identified separate working groups and progressive integration
- Defined New Basel II roadmap and project plan
- **Developed diagnostic** of internal models, processes and infrastructures within the two banks
- Identified choice of "best practices" within the two projects and consequent alignment
- Managed project of IT integration involving Basel II infrastructure
- Reported to the top management

- Defined project governance within the two banks
- Defined integrated project roadmap
- Identified group regulatory **targets** and timing
- Identified main gaps between banks' respective processes
- Defined new processes' guidelines and consequent alignment
- Formalized integrated processes and policies
- Selected "best practices" about internal models
- Designed and implemented new models (e.g. rating model)
- Integrated IT infrastructures
- Rolled out risk models within the integrated group
- Evaluated capital allocation impact with Basel II approach at Group level
- Developed credit risk reporting tools to risk department
- Arranged documents for validation required by Regulator

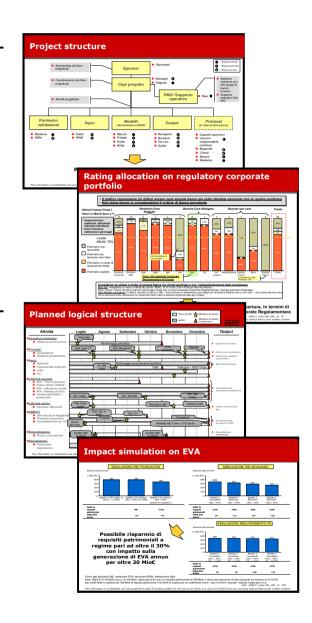
## Italian Bank Co - Risk management

#### **CLIENT SITUATION**

- Client is the product factory for medium/long term corporate credit of one of the major Italian and European banking groups
- The Basel II road to compliance required to coordinate client work streams within the overall group project and to identify potential fine tuning to take into account the specificity of the product factory business

#### **ISSUES**

- Client needed to answer the following questions:
  - Which is the most effective organization to manage the Basel II project and the Risk Management Department?
  - Which are the commercial impacts and opportunities related to the implementation of Basel II metrics and tools?
  - Are there potential **fine tuning** to be implemented on the factory?



#### **BAIN CONTRIBUTION**

- Managed project for compliance with Basel II requirements:
  - Internal models development: rating, credit risk mitigation, fair value, LGD, customer segmentation
  - Use of risk metrics in Bank's processes
  - Documents arrangement and relationship with regulator
  - Data collection process for Regulator requirement

- Designed, implemented and coordinated a complex and articulated project structure
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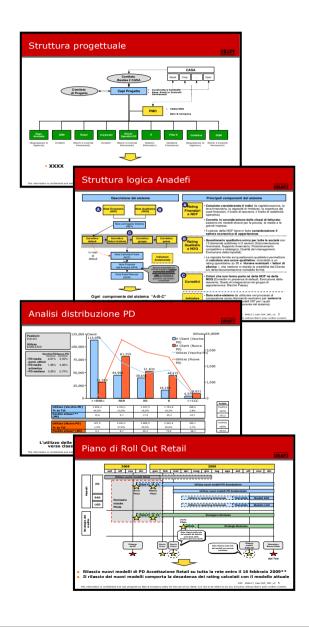
## Bank Co - Risk Management and PMO

#### **CLIENT SITUATION**

- Client is a national banking group recently acquired by a major European Banking Group as its Italian subsidiary
- The integration within such Group required
  - Creation of a Risk Management Department (resources, processes and systems)
  - Integration of the Basel II road to compliance of the Italian banks with the overall framework of the acquirer

#### **ISSUES**

- Client needed to:
  - Identify the most effective organization to manage the Basel 2 project and the Risk Management Department
  - Structure the new credit rating model in order to balance regulatory and operational requirements
  - Identification of the commercial impacts and opportunities related to the implementation of Basel II metrics and tools



#### **BAIN CONTRIBUTION**

- **Project management** of the Italian Group Basel 2 compliance path:
  - Developing and updating project plans
  - Ensuring project scheduling and quality
  - Managing priorities with project
- Direct support to vertical work streams:
  - Impact analysis on commercial and credit processes deriving from new rating models adoption
  - Contribution to the identification of target processes/models
  - Relationships with both Italian and French regulators
  - Data collection process for regulatory requirements

- Designed, implemented and coordinated a complex and articulated project structure
- **Developed the logical structure** and main inputs for the new credit rating models
- **Identified appropriate fine tuning** to apply international models on the Italian market
- Analyzed potential impact on credit portfolio and on credit and commercial processes
- Identified potential organizational corrections (e.g. credit delegation scheme)
- **Designed roll-out** plan for the new Basel 2 tools
- Provided direct support in the models roll out process

## Middle East Leasing Co - NPL management (SCT - AF)

#### **CLIENT SITUATION**

- Client is the leasing arm of a major automotive dealer in Saudi Arabia
- Significant share of current portfolio consisted of delinquent accounts, and client relied primarily on manual processes with limited scalability and sales driven by a lax credit process
  - No process to control loan granting or collections
- Client sought to understand its portfolio and salvage its financial position
  - Minimize write-off of bad loans
  - Improve the quality of new loans coming into the business by employing best in class processes

#### **ISSUES**

- Current processes are not automated and subject to interpretation of local branches
  - Can not cope with increases in portfolio to support dealer's sales
- Oracle system implemented not suited to handle and track loan granting and collection
- Limited information on delinquent customers and lack of follow-ups undermine efforts to combat non-performing loans
- **Unstable management structure**, with high turnover in key personnel

#### **BAIN CONTRIBUTION**

- Performed full diagnostic to understand situation and status of portfolio
- Mapped key processes with suggested improvements in each major segment of the value chain
- **Determined collection plan** to tackle nonperforming loan segment of the portfolio
- Designed new initiatives to improve the quality of new loans and improve status of the portfolio

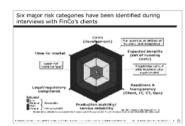
- Jointly developed recovery plan that featured 25% recovery of NPLs and presented to the shareholders
- **Numerous Bain recommendations adopted** by the client and implemented in this year's plan including:
  - Setup of automatic payment measures and drive customers towards them
  - Refinement of organization structure and setup of call center to handle beneficial customers
  - Split leasing approval decision from dealership's sales team
  - Adopt risk-based pricing model
  - Improve management of repossessed vehicles
  - Setup training programs for collectors

## European Bank Co – Strategic risk framework set-up

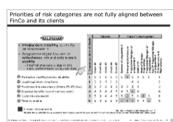
Bain's past work in banking credit and capital efficiency

#### **CLIENT SITUATION**

- Client is currently managing several strategic projects, with an implementation timeframe up to several years
- The various stakeholders are not aligned on perception of risks inherent to client's projects and do not communicate efficiently



- Identification of key risk areas through interviews with key stakeholders
- Definition of risk priorities between the different stakeholders

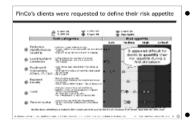


appetite

#### **ISSUES**

#### Questions:

- How can the client define its risk appetite?
- What are the root causes of weak risk management (communication, decision-making and prioritisation)?
- What are the lessons learned from an external benchmarking on programme risk management?
- What are the major improvements to be implemented in the client's risk management principles and framework?



- Assessment of the risk level of strategic projects vs. defined risk appetite
- of the different stakeholders, for each of the key risk areas identified Evaluation of this risk

Definition of risk

appetite vs. external companies

Risk level of pilot project must fit within risk appetite of clients

# Risk level of pilot project must fit within risk appetite of clients of clients. The hard of short white the constant of the short within risk appetite of clients. The short within the constant of the short within the short withi

#### **BAIN CONTRIBUTION**

#### **Setup risk management framework:**

- Identify major risk categories, define priorities and evaluate risk appetite
- Determine how trade-offs should be managed

## Perform in-depth analysis of Programme Management:

- Assess Programme Management weaknesses
- Identify root causes/impacts/ mitigating actions
- Derive Programme Risk Management principles

#### Benchmarking:

 Use best practices from other companies to update client Programme Risk Management principles and framework

- Identified priority actions
- External benchmarks supported recommendations

## Italian Bank Co - Strategic business allocation

Bain's past work in banking credit and capital efficiency

#### **CLIENT SITUATION**

- Client is one of the top five commercial banks in Italy
- In the last years the Bank has significantly improved the planning and accounting systems to integrate the profitability of business segments with risk indicators (economic capital, expected losses)
- The Bank wants to support the process of budget with the full integration of risk return consideration to optimize its business portfolio (focus on loans)
- The optimization framework must be robust in order to be shared with business lines in the negotiation process

# Example of definition of Risk Appetite matrix



#### **BAIN CONTRIBUTION**

- Creation of risk-return indicators for the main products by segments (e.g. short term loans for SB, mortgages for family, ...)
- Calculation of a track record for each risk -return indicator by integrating historical and actual data

#### **ISSUES**

- The budget process has already started and the project must be fully integrated with the running process
- The bank's system are not designed to offer an integrated and consistent risk-return view with a product/segment view

- Definition of a system of boundaries for defining the risk appetite matrix (reference portfolio allocated for business)
- Definition of alternative scenarios of capital allocation considering the defined boundaries

## Brazilian Bank Co - Capital budgeting

Bain's past work in banking credit and capital efficiency

#### **CLIENT SITUATION**

- Capital management becoming increasingly important in Brazil mainly because of:
  - Credit market growth and sophistication
  - Financial crisis impact
  - Expected regulatory changes on capital management
  - Pressure on ROE/ROA with decrease in spread/interest
- Client had hired Bain to develop its Credit Portfolio Management capabilities in the previous stages of this project, and secondary sale of credit was perceived as a key lever for capital management and the bank felt there was room to be more active in selling assets

**BAIN CONTRIBUTION** 

- Bain identified improvement opportunities in terms of the importance of capital in the existing budgeting and management process
- Bain led client to include capital as a key input for the budgeting process in order to guide commercial **projections** to maximize results/economic profit
  - Began incorporating capital in the coming year's budgeting cycle
  - Monitored implementation during that year and enhanced process for the following cycle

#### **ISSUES**

- Bank needed to structure an efficient way to increase focus on capital in the planning and **budgeting processes** (along with other relevant metrics)
- Bank wanted to achieve better capital efficiency and return through improved information for portfolio management and prioritization of commercial decisions
- Bank wanted to take relationships among Commercial, Credit and Risk Areas to the next level in order to **create more value for the bank** through proactive capital management

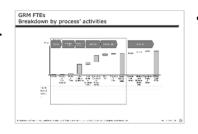
- CFO and Heads of Commercial Segments agreed on changes to budgeting process
- New online budgeting tool developed for the most recent budgeting cycle, including
  - Capital and RAROC information calculated during all steps and levels of budgeting process to support decision making
  - Economic sector guidelines based on credit portfolio view
  - Information regarding Risk Appetite
- Sophistications foreseen for next years' budgeting cycles
  - Add variables in the process to make capital an active lever during
  - Develop a tool to provide the Commercial Area with information of utilized vs. budgeted capital during the year on all relevant breakdowns

## European Bank Co - Set-up and launch of optimization program

Bain's past work in banking credit and capital efficiency

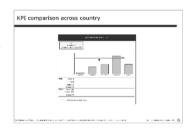
#### **CLIENT SITUATION**

- Client is a European Banking Group
- In 2010 the Bank launched an extensive project to reach and maintain best in class efficiency targets for all its Competence Lines in several European Countries
- Global Risk Management competence line has identified macro-actions and related savings full-potential



 Direct Costs/FTEs consolidation

 Saving calculation (overall/per each Country)

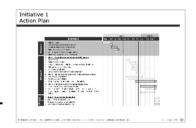


#### **BAIN CONTRIBUTION**

- Identification of # FTEs split by risk typology and process' step
- KPI definition per each segment/ process step
- Identification of initiatives targeted to improve efficiency/ increase automation
- Fine-tuning of available KPIs and check with local resources (focus on homogeneity)

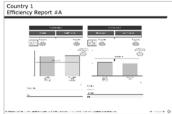
#### **ISSUES**

- Questions that arose were:
  - How to guarantee the effective roll-out of the saving initiatives?
  - How to track identified actions performance over time?



Development of action plan per each initiative

 Tableau de board development



- Consolidation of GRM Master plan:
  - Definition of the approach with each key referent
  - Launch of in-depth analysis of potential impacts on processes and IT platforms
  - Quick wins identification
- Development of efficiency/ productivity Tableau de board
  - Fine-tuning and consolidation of target KPIs
  - Efficiency report definition
  - IT briefing and first draft of implementation activity
- Launching of operative initiatives

## Brazilian Bank Co - Optimizing capital management & managerial alignment

#### **CLIENT SITUATION**

- Client is a leading Brazilian bank that has followed a relatively conservative approach to capital management which has been very successful to date
- Client's ambition is to use capital management as a tool to drive competitive advantage and superior risk adjusted performance and to be recognised in the marketplace (e.g. by investors, regulators, rating agencies etc..) as a leading exponent of capital management disciplines
- Bain has been asked to support this initiative through:
  - Developing a **point of view on capital management**
  - Capturing local and global market **best practices**
  - Objective process management

#### **ISSUES**

- Brazilian banking market is evolving rapidly:
  - Increasing importance of credit on banks' balance sheets
  - Increasing intensity of competition (often on price)
  - Declining spreads and therefore pressure on profitability
- Regulatory requirements are changing and will demand increasing sophistication (i.e. Basel III, ICAAP, etc.)
- Client has some **outstanding concerns**:
  - Whether and how to tailor capital management practices to different businesses (e.g. wholesale vs. retail)
  - How to evolve the capital management model in a way that best fits with Client's 'DNA' and that maintains effective controls while also supporting competitive advantage

#### **BAIN CONTRIBUTION**

- Phase 1: Best practices and diagnostic
  - Internal diagnostic of Client's current risk and capital management practices
  - Interviews with global financial institutions, regulators, ratings agencies etc. to develop a point on global best practices
- Phase 2: Opportunities and business case
  - Opportunity identification
  - Implications and prioritization
  - Business case and requirements for success
- Phase 3: Implementation
  - Integrated implementation roadmap
  - Communication and change management plan
  - Governance and tracking

- Client has agreed to launch three pilot initiatives within the wholesale bank:
  - Capital budgeting: integrate capital and RAROC in the planning process. Develop an integrated (P&L and capital) 2 year plan and 12 month budget as well as the internal processes/tools for performance review and re-budgeting through the cycle
  - Credit guidelines and limits: develop a managerial framework to manage to group appetite and strategic priorities through credit guidelines
  - Credit portfolio management: begin to develop the information, tools and infrastructure necessary for active credit portfolio management

## Brazilian Bank Co - Risk based pricing

#### **CLIENT SITUATION**

- Customers with different risk profiles also have different needs and diverging profitability levels
- Customers with higher risk do show higher loan losses on one hand, on the other hand they offer some attractive characteristics
  - Higher propensity to accept the card offer
  - **Higher activation and usage**, and lower defection rates
  - Less sensitive to interest rates and higher usage of revolving credit lines

#### **ISSUES**

 The challenge is to identify the optimal level of risk that maximizes profitability, after this level, loan losses start offsetting gains of higher activation, usage and retention, thus reducing profitability

#### **BAIN CONTRIBUTION**

- Calculated optimal level of risk through statistical modeling based on current database
- Undertook implementation:
  - Interest rate reduction for lower risk clients to increase attractiveness
  - Differentiated value proposition for higher risk clients with risk based pricing (based on probability of default)
  - Other product characteristics adapted by segment like minimum payments, % over limit, rewards program
- Defined business requirements like profitability model, acquisition cost, monthly vintage performance analysis and organizational structure

- The results were positive, with increases in interest income, fees, interchanges and overall profitability
- Significant impact with 25% income in profits in the first year of implementation and 50% increase in the second year

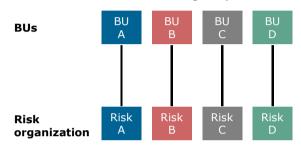
## US Commercial Finance Co - Risk Management

#### **CLIENT SITUATION**

- Parent company needs to lower risk costs 25% as part of a broad cost reduction initiative
- Commercial Finance Co has functionalized risk into Centers of Excellence (COEs) to reduce costs
  - Risk no longer reports into the business unit head
  - Underwriting COE is segmented by industry vertical and product
  - Other Risk functions (e.g. Workout, Audit) support all sales orgs

#### **Old organization**

**Decentralized:** Risk orgs reported to BU heads



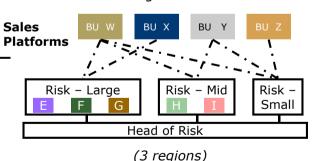
(Up to 8 regions per Risk org)

#### **New organization**

**Centralized:** Risk orgs consolidated into COEs

## **ISSUES**

 Functionalization of risk changes underwriting roles, decision-making authorities, modes of interaction with other functions, and day-to-day processing of deals





Risk organization was consolidated into COEs to reduce costs

#### **BAIN CONTRIBUTION**

- Determined what actions were necessary to ensure client was ready to underwrite deals in the immediate term
- Analyzed what is necessary for sustained cost-out and maximum effectiveness going forward
- Established clear decision roles in the early deal process using RAPID
- Standardized deal write up templates were deployed to reduce low-value-added work
- Defined a process to load-balance resources between businesses
- Concluded that tracking operating metrics closely would help to identify cost reduction opportunities

- Client is resuming underwriting with 40% less headcount
- Client now has mechanisms to generate sustained cost-out by driving process efficiency, increasing utilization of underwriters, and building support infrastructure
- Client risk managers have clear near term and long term priorities



### Brazilian Bank Co - Credit Guidelines

#### **CLIENT SITUATION**

- Bank needed to develop a systematic coordination among Risk Appetite, portfolio priorities and commercial priorities, with a more proactive approach to portfolio management
- Bank needed to ensure conditions for implementation of portfolio management policies to guide the portfolio in a systematic way

#### **ISSUES**

- Bank needed to proactively implement and manage Risk Appetite framework with the level of flexibility and governance process required by a Corporate segments
- Bank needed to prepare for a **future scenario** of capital constraints

#### **BAIN CONTRIBUTION**

- Bain **analyzed most relevant dimensions** (economic sector, rating, products etc.) and metrics (capital, RAROC, exposure, share of wallet etc.) of the portfolio
- Developed a methodology and processes to manage portfolio within existing limitations
- Bain developed bank's target portfolio framework and compared against existing portfolio to define main Credit Guidelines
- Bain helped prioritize and align guidelines with Risk Appetite Framework set by Group Holding

- Created a Capital Management Committee
- Economic sector and single name guidelines discussed and defined by senior management in Capital Management Committee
- Sector guidelines and Risk Appetite framework included as inputs for next year's budgeting cycle
- CEO decided to include sector and single name guidelines as inputs for new approvals in Credit Committee
- More structured process initiated to define bank's target portfolio

## Regional Bank Co - Market risk management

#### **CLIENT SITUATION**

- Regional Bank Co. is a big-4 state-owned bank in China
- Has trading/investment portfolios in all major financial instruments exposed to market risk
- Plans to apply for IMA approval within Basel
   II and improve related market risk mgmt
- Hired Bain to assist its journey to achieve regulatory compliance and improve market risk management

#### **ISSUES**

- The project implies technical capabilities especially in the validation of the existing models and in the valuation of exotic products
- Client requires extensive benchmark for defining worldwide best practices that takes into account the recent developments from the crisis
- Team needs to gain client trust as market risk experts

#### **BAIN CONTRIBUTION**

- Adopt Bain RACAD framework to identify the gap with the regulatory framework
- Split the project into five interlinked modules
- Leverage Bain network for extensive market risk benchmarking
- Hire outside technical experts and coding development interns for model validation and developing valuation models for complex products
- Collaborate closely with client team to ensure knowledge transfer and solutions' implementation
- Open a communication channel with local regulator CBRC

  RESULTS
- Design market risk management tools, including org., policy, process, risk model validation, valuation models and stress test for the client
- During the VaR model validation and valuation model development, uncovered and fixed Bloomberg and Risk Metrics' technical bugs
- Regional Bank Co. often consults Bain team for its market risk management decisions
- Bain China has developed a market risk expertise to be leveraged in other project or transferred to other offices

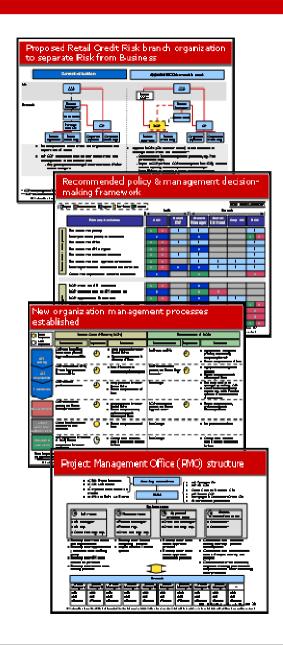
## China Bank Co - Credit risk organization

#### **CLIENT SITUATION**

- Client is a major Chinese bank with a large commercial and retail lending businesses
- Bank Co wanted to structure independent, vertically managed credit risk departments while minimizing business disruptions

#### **ISSUES**

- Unclear organizational segregation between business unit and credit risk dept at branch level made independent risk management difficult:
  - Retail risk mgmt was inside retail lending dept, creating conflict of interest
  - Branch manager decided all risk mgmt hiring and firing
  - Unclear decision-making roles, reporting lines and KPIs



#### **BAIN CONTRIBUTION**

- Developed high-level branch organization blueprint for independent, vertically managed credit risk
- Established decision-making process via RAPID framework
- Identified and adjusted mgmt process gaps/conflicts to realize new risk org
- Developed implementation framework, roadmap, and processes for PMO

- Identified key success factors and risk factor solutions
- Assessed approval, KPI evaluation and hiring/firing processes
- Redefined processes in line with new org and decision-making framework
- Defined decisions within RAPID framework to facilitate vertical management
- Developed escalation process and revised organization structure
- Redefined and codified reporting lines/relationships within branch and between HO and branch