3. 3LOD AND ROLES & RESPONSIBILITIES

The Model Risk RTF reinforces clear accountability and roles for managing risk through the Three Lines of Defence CLOD") model. The first line of defence is the business or function where the models are used and the model development function Model Risk Management ("MRM") — comprising Group Model Validation ("GMV") and Model Risk Policy and Governance ("MRPG") teams — forms the primary second line of defence function. The detailed set of Global, Regional and Country-level roles and responsibilities for the first and second line are provided in Figure 2 below.

Figure 2: Model Risk - Overview ot the Three Lines ot Detence

. 3LOD 和角色與職責

模型風險 RTF 通過三道防線 CLOD") 模型加強了管理風險的明確責任和角色。第一道防線是使用模型的業務或功能以及模型開發功能模型風險管理（"MRM"）——由集團模型驗證（"GMV"）和模型風險政策與治理（"MRPG"）團隊組成——構成主要的第二道防線職能。第一道防線的詳細的全球、區域和國家級角色和職責第二行在下面的圖 2 中提供。

圖 2：模型風險 – 三道防線概述
Figure 2: Model Risk – Overview ot the Three Lines ot Detence

- Please refer to Section 14 for list of countnes that Model Risk as a PRT is applicable. Includes model development team where applicable Includes GMV and MRPG teams.
-

圖 2：模型風險 – 三道防線概述

- 請參閱第 14 節了解模型風險作為 PRT 適用的國家列表。包括適用的模型開發團隊 包括 GMV 和 MRPG 團隊。

Standard chartered

The table below outlines the roles and responsibilities of the Three LOC) model:

Table J Overvvew of Three LOD roles and responsibilities

LOD Primary responsibilities

Model Sponsors • Model Sponsors ensure that the first LOD duties have been camed out and are responsible for the model nsk anstng from (Business/ models for which they are the assigned Model Sponsor

Product/F uncbon • Model Sponsors assign Model Owners for each model and Heads) provide oversight for Model Owner acbvrbes.

Process Universe • Process Unrverse Owners2 have the ultimate responsibility to

Ensure that Process Owners discharging their

Owners / Process in their business'funcuon are

Owners responsibility to identify models used tn thetr respectrve processes.

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• Process Owners are responsible for working With Model Owners in relabon to model overlay processes, model monttonng processes, as well as Model User testing requirements.

Model Users

Model Users • are responsible for providing feedback as part of the development process tn relabon to user tesbng

(Pnmary or • Model Users are responsible for understanding the approval o Secondary Model status of models used including any limitations, terms and

Users) conditions of use, and for providing input to the Model Owner as o part

of the model approval process.

Model Owners • Owners represent model users and must have the Model required competency to provide overstght for thetr models, and (Analyꞇics function must be able to supporting Model Understand model assumptions & Ornrtaꞇions and nsks Sponsor on model associated With model use.

Development, Assess if models rema • n fit-for-purpose or requre Implementation, redevelopment maintenance and o Ensure models are compliant With key GMRP and O & T monitonng) RTF requirements across the MLC. Model family-specific controls should be documented in the respecbve Standards.

• Model Owners must take the lead the end-to-end

In developang model solutions and ensure that these are developed tn line With the requirements of GMRP and applicable Standards. Including

Process Unverse Owners as defined jn the ERMF ve BusjneseJFuncison I

Google

翻譯中文

英文
中文（繁體）
Standard chartered

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下表概述了三個 LOC) 模型的角色和職責：

表 J 三個 LOD 角色和職責概述

LOD 主要職責

模型贊助商 ‧ 模型贊助商確保第一個 LOD 職責已經出來，並負責從（他們是指定的模型贊助商的業務/模型）

Product/F uncbon ‧ 模特贊助商為每個模特指派模特負責人，負責人）對模特負責人進行監督。

Process Universe ‧ Process Unrverse Owners2 有最終責任：

確保流程所有者履行其

其業務功能中的所有者/流程是

所有者有責任識別在各個流程中使用的模型。

（業務/ ‧ 流程所有者，與模型用戶一起，是負責在經理中識別模型和模型用例的產品/功能，該經理尊重業務、產品或功能流程。 ‧ 流程所有者負責與模型端到端協調-結束與模型實施和流程相關的所有者和用戶）退役。

- 流程所有者負責與模型所有者合作，對覆蓋流程、模型蒙頓流程以及模型用戶測試要求進行建模。

模型用戶

模型用戶 ・ 負責在開發過程中向用戶 tesbng 提供反饋

（Pnmary 或 ・ 模型用戶有責任了解所用模型的批准 o 次要模型狀態，包括任何限制、條款和

用戶）使用條件，以及作為模型批准過程的一部分向模型所有者提供輸入。

模型所有者 ・ 所有者代表模型用戶，並且必須具有模型所需的能力來為模型提供監督，並且（Analyücs 功能必須能夠支持模型理解模型假設以及與模型使用相關的模型的發起人和 nsks。

開發、評估模型是否符合用途或要求 實施、重新開發維護和 o 確保模型符合整個 MLC 的關鍵 GMRP 和 O&T 監控）RTF 要求。模型系列特定的控制應記錄在相應的標準中。

・ 模型所有者必須帶頭端到端

開發模型解決方案，並確保這些解決方案的開發符合 GMRP 和適用標準的要求。包含

按照 ERMF ve BusjneseJFuncison I-buts re 的定義處理逆向所有者

Data 8 methodology applied in the development process are appropoate for the intended model use.

O The process ts adequately documented, allowtnq a qualrfied third party to reproduce and assess the results of the model.

Model nsks should assessed at the tnmabon and development stages, preliminary matenallty and uncertajnty raongs assigned. And necessary rnmgabng actions and controls incorporated.

Model monitoring js regularly performed to track and remediate model performance issues and potential model ms-use.

Model limitations, assumptions and nsks are communicated to model users & model sponsors.

Model Owners should provide the annual project plan covenng known major projects and quarterly updates to addresses any plan changes.

Model Owners should coordinate the submission of the model for validation, and submwon of the approval package for considerabon.

Model Owners should coordinate With Process Owners and Model Users in relabon to model approval, Implementation and decomm • sston.'

Model Owners should work With Process Owners tn relation to model overlay processes and model morutonng processes.

Model Owners should ensure models perform as expected and are only used for thetr approved use cases. They should formally nsk-accept and remediate where necessary for conbnuabon of business.

Mode/ Owners must ensure that appropnate model users are suffctentjy engaged jn model use test acbvmes.

Model Owners, co-own MFS and ensure alignment between this RTF, GMRP and applicable laws and regulabons. Model Owners coordinate submtssjon of models tor validabon and subrntssjon of the approval package for consideration.

GMV • Independent validabon and grading of the models as per the (Group requirements tn me RTF. Policy, Standards and apphcable laws Model Vabdabon) and regulations.

Revvew and challenge on whether models remam fit-forpurpose Ime mth desjgn objecbves and busmess uses, including models' Inputs. Processing and output o
     Identify and assess any model nsk Issues that are relevant to the bustness requirements and model approval dects • ons.

Ensure sutfictent resources and competent staff to validate
Standard chartered

The table below outlines the roles and responsibilities of the Three LOC) model:

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Co-own MFS and ensure alignment between thts RTF, GMRP and applicable laws and regulabons.

開發過程中應用的 Data 8 方法適用於預期的模型用途。

O 過程 ts 充分記錄，允許合格的第三方復制和評估模型的結果。

模型 nsks 應在 tnmabon 和開發階段進行評估，初步評估和分配的不確定性。並納入必要的 rnmgabng 行動和控制。

模型監控 js 定期執行以跟踪和修復模型性能問題和潛在的模型 ms 使用。

將模型限制、假設和 nsk 傳達給模型用戶和模型發起人。

模型所有者應提供與已知主要項目相關的年度項目計劃和季度更新，以解決任

何計劃變更。

模型所有者應協調模型的提交以進行驗證,並提交批准包以供考慮。

模型所有者應與流程所有者和模型用戶就模型的批准、實施和分解進行協調。

模型所有者應該與流程所有者一起工作,這與模型覆蓋流程和模型 morutonng 流程有關。

模型所有者應確保模型按預期執行,並且僅用於已批准的用例。他們應該正式接受並在必要時進行補救,以實現業務合作。

模式/所有者必須確保適當的模型用戶足夠參與模型使用測試活動。

模型所有者共同擁有 MFS,並確保此 RTF、GMRP 與適用法律和法規保持一致。模型所有者協調模型的提交以用於驗證和批准包的提交以供考慮。
GMV · 根據(集團要求 tn me RTF。政策、標準和適用法律 Model Vabdabon)和法規對模型進行獨立驗證和分級。

Revvew 和挑戰模型是否適用於 Ime mth 設計對象和業務用途,包括模型的輸入。處理和輸出 o 識別和評估與完整性要求和模型批准指令相關的任何模型 nsk 問題。

確保有足夠的資源和稱職的員工來驗證
渣打銀行

下表概述了三個 LOC) 模型的角色和職責:

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Product/F uncbon · 模特贊助商為每個模特指派模特負責人,負責人)對模特負責人進行監督。

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開發模型解決方案，並確保這些解決方案的開發符合 GMRP 和適用標準的要求。包含

按照 ERMF ve BusjneseJFuncison I-buts re 的定義處理逆向所有者

共同擁有 MFS 並確保 RTF、GMRP 與適用法律和法規之間的一致性
模型風險政策和治理）

根據 GMRP 和相關標準規定的具體要求，持續評估和維護 MRM 框架。

準備模型 nsk 報告給模型風險委員會和其他高級管理人員，包括執行級別和董
事會級別的 nsk 委員會。

負責年度狀態評估的管理和執行。

準備集團的模型 nsk 評估、模型風險委員會和其他高級管理人員（包括執行級
別和董事會級別的 nsk 委員會）的 nsk 概況報告。

共同擁有 MFS 並確保此 RTF、GMRP 與適用法律法規保持一致。

○

8

當地的

RFO 代表

模型風險的二線活動在很大程度上是集中的。對於地區和國家，當地 RFO 代
表國家特定模型的第二個 LOD 活動中的責任。評估模型 nsk 管理的當地監管
要求，並確保將這些要求嵌入到他們的流程中

確保該地區/國家/地區使用的模型符合 GMRP 的要求

在必要時與集團 MRPG 聯絡，以協助履行第二個 LOD 職責。

領導示範 nsk 管理事項的當地監管互動。

確保監控模型性能並針對所有模型性能違規採取補救措施。

如果國家 I 的區域做法不合規，請將問題上報至 Group MRPG。

在適用的情況下，維護本 RTF 的國家附錄。

〇

團體

內部審計

集團內部審計充當第三個 LOD，獨立評估第一個和第二個 LOD 控制和風險管理流程是否有效。