

“Basel IV”

Regulatory Overview and IRB Approach for Credit Risk

Regulation Overview

In December 2017 the Basel Committee on Banking Supervision published final rules to “Basel IV” (also referred to as Basel 3.1) to build on the earlier Basel Accords. It aims to update the way risk-weighted assets (RWAs) are calculated and improve the comparability of banks’ capital ratios by:

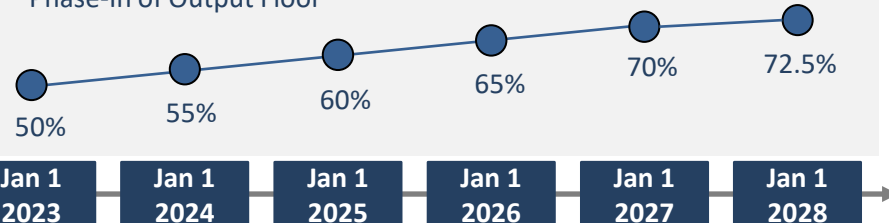
- I. Enhancing the robustness and risk sensitivity of the standardised approaches for credit risk, credit valuation adjustment (CVA) risk and operational risk;
- II. Constraining the use of the internal model approaches by no longer allowing the use of the internal model approaches for CVA risk and for operational risk, and placing input floors on the IRB approach for credit risk;
- III. Introducing a leverage ratio buffer to further limit the leverage of global systemically important banks (G-SIBs); and
- IV. Introducing a new output floor based on the standardized approaches.

Implementation Dates and Transitional Arrangements

BCBS 424: Jan 1 2023 International Implementation Date of “Basel IV”

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|---|--|
| 1. Revised standardised approach for credit risk, | 4. Revised operational risk framework, |
| 2. Revised IRB framework, | 5. Revised market risk framework, |
| 3. Revised CVA framework, | 6. Leverage ratio (revised exposure definition and G-SIB buffer) |

Phase-In of Output Floor



Revisions to the Internal Ratings-Based (IRB) Approaches for Credit Risk

There are three main revisions to the IRB approaches for credit risk:

- 1 Removal of the option to use the advanced internal-ratings based (A-IRB) approach for certain asset classes;
- 2 Floors introduced for bank-estimated IRB parameters such as probabilities of default (PD) and loss-given-default (LGD) which are used as inputs to the RWA calculation;
- 3 Greater specification provided of parameter estimation practices to reduce RWA variability.

Revised scope of IRB approaches for asset classes:

Portfolio/exposure	Before: Available Approaches	After Basel ‘IV’: Available Approaches
Large & mid-sized corporates (consolidated rev’s > €500m)	Advanced IRB (A-IRB), Foundation IRB (F-IRB), Standardised Approach (SA)	F-IRB, SA
Banks & other FIs	A-IRB, F-IRB, SA	F-IRB, SA
Equities	Various IRB approaches	SA
Specialised lending	A-IRB, F-IRB, slotting, SA	A-IRB, F-IRB, slotting, SA

Minimum parameter values in the revised IRB framework:

	PD	LGD		EAD
		Unsecured	Secured	
Corporate	5 bp	25%	Varying by collateral type	The sum of: (i) on-B/S exposures; & (ii) 50% of off-B/S exposure using applicable CCF in standardised approach
Retail Classes:				
Mortgages	5 bp	N/A	5%	
QRRE transactors	5 bp	50%	N/A	
QRRE revolvers	10 bp	50%	N/A	
Other retail	5 bp	30%	Varying by collateral type	

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Revised Standardised Approach to Credit Risk (1/2)

Revisions to the Standardised Approach for Credit Risk

The main revisions to the standardised approach for credit risk applying to banks and corporates is as follows:

- For banks and corporates, a more granular approach has been developed for unrated exposures and exposures where the ratings approach is not permitted;
- For exposures to banks, some of the risk weights for rated exposures have been recalibrated, and standalone treatment for covered bonds has been introduced;
- For exposures to corporates, a more granular approach has been developed, including specific weights applying to small and medium-sized enterprises (SMEs), and a standalone treatment for exposures to project finance, object finance and commodities finance.

Exposures to Banks (Risk weights in jurisdictions where the ratings approach is permitted)								
External Rating	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	Below B-	Unrated		
Risk Weight	20%	30%	50%	100%	150%	As for SCRA below		
Short-Term Exposures	20%	20%	20%	50%	150%	As for SCRA below		
Exposures to Banks (Risk weights where the ratings approach is not permitted and for unrated exposures)								
Standardised Credit Risk Assessment Approach (SCRA) grades	Grade A		Grade B			Grade C		
Risk Weight	40%		75%			150%		
Short-Term Exposures	20%		50%			150%		
Exposures to Covered Bonds (Risk weights for rated covered bonds)								
External Issue-Specific Rating	AAA to AA-		A+ to BBB-		BB+ to B-		Below B-	
Risk Weight	10%		20%		50%		100%	
Exposures to Covered Bonds (Risk weights for unrated covered bonds)								
Risk Weight of Issuing Bank	20%	30%	40%	50%	75%	100%	150%	
Risk Weight	10%	15%	20%	25%	35%	50%	100%	
Exposures to General Corporates (Risk weights in jurisdictions where the ratings approach is permitted)								
External Rating of Counterparty	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to BB-	Below BB-	Unrated		
Risk weight	20%	50%	75%	100%	150%	100% or 85% if corporate SME		
Exposures to General Corporates (Risk weights where rating approach is not permitted)								
SCRA Grades	Investment Grade					All Other		
General corporate (non-SME)	65%					100%		
SME general corporate	85%					85%		
Exposures to Project Finance, Object Finance and Commodities Finance								
Exposure (Excluding Real Estate)	Project Finance			Object and Commodity Finance				
Issue-specific ratings available and permitted	Same as for general corporate (see above)			Same as for general corporate (see above)				
Rating not available or not permitted	130% pre-operational phase 100% operational phase 80% operational phase (high quality)			100%				

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Revised Standardised Approach to Credit Risk (2/2)

The main revisions to the standardised approach for credit risk applying to the remaining exposures is as follows:

- For residential real estate and commercial real estate exposures, more risk-sensitive approaches have been developed;
- For retail exposures, a more granular treatment applies, which distinguishes between different types of retail exposures such as revolving facilities & transactors;
- For subordinated debt and equity exposures, a more granular risk weight treatment applies;
- For off-balance sheet items, the credit conversion factors (CCFs) have been made more risk-sensitive, including the introduction of positive CCFs for unconditionally cancellable commitments (UCCs).

Retail Exposures Excluding Real Estate								
Risk Weight		Non-Revolving	Revolving Transactors	Revolving Revolvers	Other Retail			
		75%	45%	75%	100%			
Residential Real Estate Exposures								
LTV bands	Below 50%	50% to 60%	60% to 70%	70% to 80%	80% to 90%	90% to 100%	above 100%	Criteria not met
General RRE: Whole Loan Approach RW	20%	25%	30%		40%	50%	70%	RW of counterparty
General RRE: Loan Splitting Approach RW	20%		RW of counterparty					RW of counterparty
IPRRE: Whole loan approach RW	30%	35%	45%		60%	75%	105%	150%
Commercial Real Estate (CRE) Exposures								
General CRE: Whole loan approach	LTV ≤ 60% Min (60%, RW of counterparty)			LTV > 60% RW of counterparty		Criteria not met RW of counterparty		
General CRE: Loan-splitting approach	LTV ≤ 55% Min (60%, RW of counterparty)			LTV > 55% RW of counterparty		Criteria not met RW of counterparty		
IPCRE: Whole loan approach	LTV ≤ 60% 70%		60% < LTV ≤ 80% 90%	LTV > 80% 110%		Criteria not met 150%		
Land acq., develop and construction exposures:								
Loan to company/SPV	150%							
Residential ADC loan	100%							
Subordinated Debt and Equity (Excluding Amounts Deducted)								
Risk Weight		Subordinated debt	Equity exposures to legislated programmes	“Speculative unlisted equity”	All other equity exposures			
		150%	100%	400%	250%			
Credit Conversion Factors for Off-Balance Sheet Exposures								
CCF	UCCs	Commitments	NIFs and RUFs, and contingencies	ST self-liquidating letters of credit	Direct credit substitutes			
	10%	40%	50%	20%	100%			

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Other Key Revisions to Risk Frameworks

Revisions to the CVA Risk Framework

The CVA risk framework is being revised to ① enhance its risk sensitivity, ② strengthen its robustness, and ③ improve its consistency with the market risk framework:

- ① The CVA framework is being revised to take into account the exposure component of CVA risk along with its associated hedges;
- ② The internally modelled approach is no longer allowed to be used as it was viewed that banks could not model it in a robust and prudent manner. Rather CVA risk be calculated using: (i) a standardised approach; and (ii) a basic approach.
In addition, a bank with an aggregate notional amount of non-centrally cleared derivatives less than or equal to €100 billion may calculate their CVA capital charge as a simple multiplier of its counterparty credit risk charge.
- ③ The standardised and basic approaches of the revised CVA framework is being updated to be more consistent with the revised market risk framework such as basing the standardized CVA approach on fair value sensitivities to market risk factors.

Revisions to the Leverage Ratio Framework

“Basel IV” introduces a leverage ratio buffer for global systemically important banks (G-SIBs) which must be met with Tier 1 capital and is set at 50% of a G-SIB’s risk-weighted higher-loss absorbency requirements. In addition, there will be distribution constraints imposed on G-SIBs that will depend on its CET1 risk-weighted ratio and Tier 1 leverage ratio.

Also, there are updates to the definition of the leverage ratio exposure measure such as (i) modifying how derivatives are reflected in the exposure measure and (ii) updating the treatment of off-balance sheet exposures.

Revisions to the Operational Risk Framework

The operational risk framework is becoming more streamlined as the advanced measurement approaches (AMA) for calculating operational risk capital requirements which uses bank’s internal models and the existing three standardised approaches are being replaced with a single risk-sensitive standardised approach.

- The new standardised approach for operational risk determines a bank’s operational risk capital requirements based on two components:
- (i) A measure of a bank’s income: assuming operational risk has a positive correlation with bank’s income; and
 - (ii) A measure of a bank’s historical losses: assuming historical operational losses is positively correlated with future operational losses.

Operational Risk Capital is the product of:

Business Indicator (BI)	x	Marginal BI Coefficients (α_i)	x	Internal Loss Multiplier								
BI = Interest, Leases, & Derivative Component + Services Component + Financial Component		α_i based on BI bucket:		A function of the bank’s previous 10 years historical losses								
		<table border="1"><thead><tr><th>BI Range</th><th>α_i</th></tr></thead><tbody><tr><td>≤€1 bn</td><td>0.12</td></tr><tr><td>€1 bn < BI ≤ €30 bn</td><td>0.15</td></tr><tr><td>>€30 bn</td><td>0.18</td></tr></tbody></table>	BI Range	α_i	≤€1 bn	0.12	€1 bn < BI ≤ €30 bn	0.15	>€30 bn	0.18		
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Introduction to a New Output Floor

A new capital output floor is being introduced that limits the extent to which banks can lower their capital requirements using internal models relative to the standardised approaches..

- Under the new approach the calculation of risk weighted assets is the higher of:
- (i) total risk weighted assets calculated under the approach approved by their regulator, and
 - (ii) 72.5% of the total risk weighted assets calculated using the standardised approach;

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