MOODY'S

# MODELING METHODOLOGY

# Key Steps to Increasing Credit Portfolio Return/Risk

#### Abstract

Institutions holding credit portfolios can increase stakeholder value by increasing portfolio return/risk, while also ensuring capital adequacy and regulatory compliance. This paper describes a conceptually-sound quantitative and practical approach to increase portfolio return/risk, details the requisite steps, and shows how they can be effectively performed using Moody's Analytics PortfolioStudio®, a cloud-based, credit portfolio management solution designed with the business user in mind.

#### Authors

Kamal Kumar Director – Research

Pierre Xu Director – Research

#### Acknowledgements

We would like to thank Christopher Crossen and Amnon Levy for their comments and suggestions.

#### **Contact Us**

Americas +1.212.553.1653 clientservices@moodys.com

Europe +44.20.7772.5454 clientservices.emea@moodys.com

Asia (Excluding Japan) +85 2 2916 1121 clientservices.asia@moodys.com

Japan +81 3 5408 4100 clientservices.japan@moodys.com

## Table of Contents

1.Introduction	3
2. Measuring Portfolio Risk and Ensuring Capital Adequacy	4
Loss Distribution: How much capital is required to absorb possible portfolio losses?	4
Stress Testing: What are the expected losses and capital requirements under stress scenarios?	5
Reverse Stress Testing: What scenarios, borrowers, sectors/regions contribute most to large losses?	6
Capital Planning: What actions will be taken to maintain capital adequacy as stress scenarios unfold?	7
Risk Appetite: What are the target levels (risk appetite) and limits (risk tolerances) for risk taking?	7
3. Quantifying Each Exposure's Incremental Impact on Portfolio Risk	8
Risk Contribution: What is the increase in portfolio risk for a \$1 increase in exposure (notional)?	8
Risk Concentrations: Which borrowers, sectors, and regions impact portfolio risk the most?	9
Risk Attribution: Which factors cause and explain exposure's Risk Contribution level?	10
4. Setting Limits to Prevent Excessive Risk Concentrations	12
Segment Limits: What is the notional limit given a limit on each segment's Risk Contribution?	12
Borrower Limits: What is the notional limit given a limit on each borrower's Risk Contribution?	13
5. Increasing/Decreasing Credit Exposure to Increase Portfolio Return/Risk	14
Asset Selection: Which exposures should be increased/decreased to increase portfolio return/risk?	14
Optimal Allocation to Segments: Which segments should be grown/reduced and by how much, in order to maximize portfolio return/risk (Sharpe Ratio)?	14
6. Pricing and Sizing New Deals to Increase Portfolio Return/Risk	16
Risk-Based Pricing: What is the deal's Risk Contribution and Sharpe Ratio, i.e., deal's impact on portfolio return/risk, taking accou deal's notional, standalone risk, and correlation with the portfolio?	unt of 16
7.PortfolioStudio: Additional Functionality	17
What-If Analysis	17
Risk Dashboard	17
Spread Risk	22
8. Summary	23
References	24

### 1. Introduction

Credit portfolios, consisting of loans, bonds, and other credit assets, make up a large portion of all assets on most financial institutions' balance sheets. Hence, credit portfolio value, return, and risk are key drivers of shareholder/stakeholder value, return, and risk. Institutions can increase stakeholder value by increasing portfolio return/risk while also ensuring capital adequacy and regulatory compliance. This process, for the most part, requires five key steps:

- 1. Measuring portfolio risk and ensuring capital adequacy
- Quantifying each exposure's marginal impact on portfolio risk (An exposure's marginal impact on portfolio risk is defined as the increase in portfolio risk for a dollar more of that exposure and is used to perform Steps 3–5)
- 3. Setting limits to prevent excessive risk concentrations
- 4. Increasing/decreasing credit exposure to increase portfolio return/risk
- 5. Pricing and sizing new deals to increase portfolio return/risk

While Steps 4 and 5, ultimately, and most directly, increase stakeholder value, they cannot be effectively performed without first securing regulatory approval, favorable credit rating, and stakeholder confidence by performing Step 1, i.e., measuring portfolio risk and ensuring capital adequacy, then performing Step 2 to quantify each exposure's marginal impact on portfolio risk, and then using the marginal measures to effectively perform Steps 3, 4, and 5. (Using marginal return/risk measures to perform Steps 4 and 5 leads to a portfolio with optimal (maximum) return/risk, where marginal return/risk impact is equal across all exposures in the optimal portfolio). Each of the five steps involves key questions and sub-steps that must be addressed and performed in order to increase portfolio return/risk and, thereby, increase stakeholder value.

#### Key Steps and Questions

- 1. Measuring portfolio risk and ensuring capital adequacy
  - a. Loss Distribution: How much capital is required to absorb possible portfolio losses?
  - b. Stress Testing: What are the expected losses and capital requirements under stress scenarios?
  - c. Reverse Stress Testing: What scenarios, borrowers, sectors/regions contribute most to large losses?
  - d. Capital Planning: What actions will be taken to maintain capital adequacy as stress scenarios unfold?
  - e. Risk Appetite: What are the target levels (risk appetite) and limits (risk tolerances) for risk taking?
- 2. Quantifying each exposure's marginal impact on portfolio risk
  - a. Risk Contribution: What is the increase in portfolio risk for a \$1 increase in exposure (notional)?
  - b. Risk Concentrations: Which borrowers, sectors, and regions impact portfolio risk the most?
  - c. Risk Attribution: Which factors cause and explain exposure's Risk Contribution level?
- 3. Setting limits to prevent excessive risk concentrations
  - a. Segment Limits: What is the notional limit given a limit on each segment's Risk Contribution?
  - b. Borrower Limits: What is the notional limit given a limit on borrower's Risk Contribution?
- 4. Increasing/reducing credit exposure to increase portfolio return/risk
  - a. Asset Selection: Which exposures should be increased/decreased to increase portfolio return/risk?
  - b. Optimal Allocation: Which segments should be grown/reduced and by how much, in order to maximize portfolio return/risk ("Sharpe Ratio")?
- 5. Pricing and sizing new deals to increase portfolio return/risk
  - a. Risk-Based Pricing: What is the deal's Risk Contribution and Sharpe Ratio, i.e., deal's marginal impact on portfolio return/risk, taking account of deal's notional, standalone risk, and correlation with portfolio?

Designed with the business user in mind and delivered as a cloud-based application, and as described in the rest of this document, Moody's Analytics PortfolioStudio<sup>®</sup> is an agile efficient solution to perform the five steps and their sub-steps and address questions listed above.

We organize the remainder of this paper as follows: Sections 2–6 describe quantitative approaches and methods for performing each of the steps listed above and sub-steps using PortfolioStudio. Section 7 describes additional functionalities of PortfolioStudio. Section 8 concludes.

## 2. Measuring Portfolio Risk and Ensuring Capital Adequacy

While regulatory requirements and expectations differ based on jurisdiction and institution type, most financial institutions understand the need to assess and ensure capital adequacy from regulatory, accounting, and economic perspectives, together with actual use of the capital adequacy assessment results and metrics. PortfolioStudio's outputs inform, support, and enable regulatory, accounting, and economic decision-making by facilitating stress testing and calculating risk and return using CECL- or IFRS 9-based credit earnings, as well as economic or fair value methods.

#### Loss Distribution: How much capital is required to absorb possible portfolio losses?

PortfolioStudio uses the extensively validated Moody's Analytics Global Correlation ("GCorr™") framework, together with bottom-up Monte Carlo simulation, to simulate credit losses (due to credit migration and default) at a future horizon (typically one year) for each exposure in the portfolio, taking into account standalone risk, as well as portfolio correlations and risk concentrations.<sup>1</sup> Exposure losses for all exposures and simulation trials are used to calculate the probability distribution of portfolio losses at the specified future horizon, and to calculate crucial portfolio<sup>2</sup> risk metrics, including:

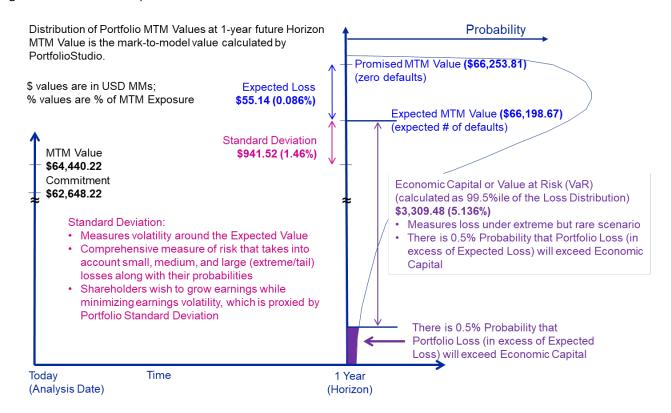
- » Loss quantile (aka Credit Value at Risk (CVaR) or Economic Capital ("EC")) Example: 99.9 percentile loss corresponds to the capital required to absorb all but the worst 0.1% of portfolio losses and can be compared with available capital (e.g. CET1) to assess capital adequacy. The quantile or confidence level (e.g. 99.9 percentile) can be specified in PortfolioStudio to match regulatory or economic requirements or the survival probability corresponding to the institution's target credit rating.
- >> Unexpected loss, i.e., standard deviation or volatility of portfolio losses at a future horizon Note: Expected return and expected loss measures are also calculated and reported by PortfolioStudio. Institutions can choose whether PortfolioStudio calculates return and risk measures using loss based on economic or fair value or (optionally) loss based on CECL- or IFRS 9-based credit earnings.
- » List of macroeconomic variables ranked by their correlation with portfolio loss

PortfolioStudio's portfolio overview functionality outputs the above risk metrics, together with portfolio loss distribution and other relevant metrics — all of which inform and support an institution's capital adequacy assessment, capital planning and management, risk strategy, risk appetite, and risk tolerance, and are increasingly being reported and communicated both internally and externally.

<sup>&</sup>lt;sup>1</sup> PortfolioStudio is designed to explicitly analyze a broad range of asset classes (public and private firms, CRE, retail, sovereign, and project finance) and credit instruments (term loans, revolving lines of credit, bonds, CDS, and structured products). GCorr is a multi-factor correlation model — consisting of close to 1,000 geographical, sectoral, and national and regional macroeconomic factors — is updated and validated annually and is based on a long time series of empirical and granular data capturing intra- and inter-asset class correlations. For more information, see "An Overview of Modeling Credit Portfolios" by Levy (2013); "Modeling Credit Correlations: An Overview of the Moody's Analytics GCorr Model" by Huang, Lanfranconi, Patel, and Pospisil (2012); and "Portfolio Management of Default Risk" by Kealhofer and Bohn (2001).

<sup>&</sup>lt;sup>2</sup> The same simulation is also used to calculate exposure and segment-level risk metrics, including marginal risk contributions and correlation with portfolio, described later in this document.

#### Figure 1 Distribution of portfolio value at horizon.



Note: PortfolioStudio calculates return and risk measures and loss distribution using loss based on economic or fair value, or (optionally) loss based on CECL- or IFRS 9-based credit earnings.

#### Stress Testing: What are the expected losses and capital requirements under stress scenarios?

PortfolioStudio's stress testing module uses a Monte Carlo simulation engine, together with the GCorr framework, to capture and calculate systematic factors' (e.g. country and industry factors) and macroeconomic factors' (e.g. GDP, unemployment rate, etc.) impacts on borrower credit quality and the resulting exposure and portfolio losses and credit earnings under user-specified or preloaded stress scenarios (e.g. CCAR scenarios). GCorr model coverage continues to expand and currently includes close to 1,000 total factors, including about 250 national, regional, and international macroeconomic variables.

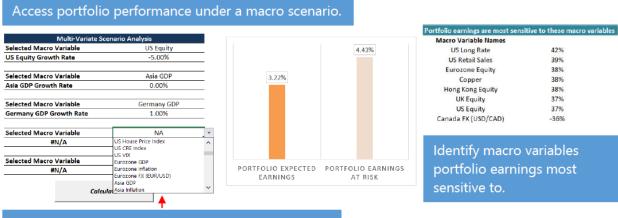
PortfolioStudio's single-period stress testing simulates portfolio loss and credit earnings to calculate, conditional upon a set of macrovariables at horizon, portfolio expected loss (or expected credit earnings) and loss quantile (or credit earnings at risk), which capture the uncertainty in loss (or credit earnings) due to uncertainty in factors other than those specified in the single-period stress scenario.

PortfolioStudio's multi-period stress testing is used to calculate expected losses, loss distribution, and capital requirements for future quarters, given a user-specified multi-quarter macroeconomic scenario. PortfolioStudio first calculates stressed PDs for each borrower, at each period of the scenario, and then, using the stressed PDs as inputs, performs risk analysis and calculates results for each period during the multi-period scenario, thus yielding a term structure of expected loss (or credit earnings), loss quantiles (credit earnings at risk), and capital requirements.

Single-period and multi-period stress testing results from PortfolioStudio can be used to:

- » Calculate expected loss, loss volatility, and capital requirements under stress scenarios
- » Benchmark similar results from alternative models or estimates
- » Assess capital adequacy, e.g. estimate the probability of exhausting the capital surplus by comparing distribution of portfolio loss and credit earnings and capital demand and supply under stress scenarios
- » Meet regulatory and internal requirements for stress testing, communication, and disclosures
- » Hedge assets, rebalance portfolio, set risk limits, and price risk based on sensitivity to stress

Figure 2 Stress testing using PortfolioStudio.



#### Around 100 macro variables available for selection.

Macro-Variable Name	MV Code	Format	Q0	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13
US GDP	MV0001	Percentage Point	2.7	-4.7	-8.9	-6.8	-4.7	-3.6	-1.3	-0.2	2.8	3.5	4	4.2	4.5	4.
US Nominal GDP	MV0002	Percentage Point	5.0	-2.3	-7.1	-5.1	-3	-1.8	0.3	1.4	4.3	4.8	5.2	5.3	5.5	5.4
US Equity	MV0011	Level	27673.2	13465.6	11631.4	10575.2	10306.1	9689.4	10099.8	10948.6	12031.1	13234.4	14712.7	16323.1	18143.2	20168.
US House Price Index	MV0012	Level	194.4	185.7	171.1	159.4	150.7	143.4	139	136.1	136.1	136.2	137.3	138.8	140.7	14
US CRE Index	MV0013	Level	278.7	261.9	234.1	211.8	195.1	181.1	172.8	167.2	167.2	167.3	169.5	172.3	176	180.
US VIX	MV0014	Level	13.1	50.7	62.4	59.5	52.8	47.4	37.9	29.7	23.5	19.8	17.5	16	15	14.4
Eurozone GDP	MV0015	Percentage Point	2.3	-4	-5.2	-4.3	-3.3	-1.6	-0.1	1	1.7	2.1	2.4	2.4	2.4	2.5
Eurozone Inflation	MV0016	Percentage Point	1.7	0.1	-0.7	-1.1	-1.2	-0.8	-0.5	-0.1	0.3	0.6	0.8	1	1.1	1.
Asia GDP	MV0018	Percentage Point	5.9	-1.5	-0.8	1.5	2.9	4.9	5.9	6.2	6.2	6.3	6.4	6.5	6.5	6.
Asia Inflation	MV0019	Percentage Point	2.6	0.3	-1	-1.7	-2.2	-2.1	-1.8	-1.4	-1	-0.6	-0.3	0	0.4	0.3
Asia FX	MV0020	Level	91.0	99.5	103.5	105.9	107.5	106.3	105	103.7	102.5	101.1	100	98.9	98.1	97.4
Japan GDP	MV0021	Percentage Point	1.8	-3.8	-7.4	-9.9	-11.4	-9.8	-7.3	-5	-3.2	-1.7	-0.5	0.3	0.9	1.
Japan Inflation	MV0022	Percentage Point	0.9	-2.6	-3.7	-5	-5.8	-5.2	-4.5	-3.7	-3	-2.3	-1.7	-1.2	-0.7	-0.

Allows for multi-period analysis under a macro scenario.

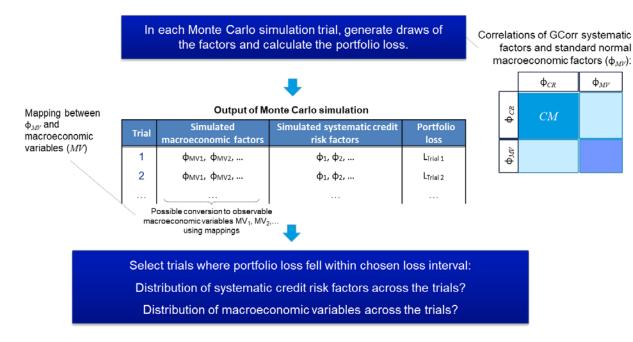
#### Reverse Stress Testing: What scenarios, borrowers, sectors/regions contribute most to large losses?

PortfolioStudio's reverse stress testing module utilizes simulation results (including portfolio loss, tail risk contributions, and GCorr systematic and macroeconomic factor realizations) to:

- » Identify macroeconomic scenarios corresponding to a given level of portfolio loss or credit earnings
- » Identify sectors and borrowers contributing most to such portfolio loss or credit earnings
- » Reveal and plan for hidden vulnerabilities in the portfolio
- » Benchmark against regulatory or other internal stressed scenarios
- » Select macroeconomic variables for stress testing

Reverse stress testing approach using Monte Carlo simulation results. Figure 3

# **Reverse Stress Testing**



#### Capital Planning: What actions will be taken to maintain capital adequacy as stress scenarios unfold?

Previously described loss distribution, stress testing, and reverse stress testing results from PortfolioStudio can be used to:

- Project capital demand and capital supply and assess capital adequacy under stress scenarios »
- Plan and determine management actions (e.g. capital increase or risk/exposure reduction) that will be taken to prevent » and to recover from possible capital deficiencies, if and as stress scenarios unfold
- Use such capital planning as part of internal capital adequacy assessment process and discussion with regulators, » supervisors, and stakeholders.

#### Risk Appetite: What are the target levels (risk appetite) and limits (risk tolerances) for risk taking?

Prior sections describe how PortfolioStudio can be used to measure portfolio risk (loss distribution, volatility, quantile, etc.) and perform stress testing and reverse stress testing to assess and ensure capital adequacy. Portfolio risk and capital adequacy assessment results and metrics from PortfolioStudio can then be used to estimate capital demand and supply and compare them with market opportunity and risk strategy to inform and determine:

- Risk capacity, i.e., the maximum amount of risk an institution can support in pursuit of its business objectives »
- Risk appetite, i.e., the target amount or range of risk an institution is willing to accept in pursuit of its business » objectives; risk appetite is lower than risk capacity to allow for a safety margin
  - o example: risk appetite to have AA S&P rating and CET1/EC of 250%
- Risk tolerance and risk limits, i.e., boundaries of risk taking within which an institution is willing to operate; risk appetite » is articulated more qualitatively and at aggregate level, while risk tolerances and limits are more quantitative and granular, e.g. borrower and segment limits
  - o example of segment risk limit: automotive segment expected loss under CCAR adverse scenario shall not exceed 20% of total portfolio's expected loss under CCAR adverse scenario

This section describes how PortfolioStudio can be used to measure portfolio risk, assess and ensure capital adequacy, and thereby secure regulatory approval, favorable credit rating, and stakeholder confidence — not just from the normative (i.e., regulatory or accounting) perspective but also from internal economic perspective. In the next section, we describe the next key step in increasing portfolio return/risk.

 $\phi_{MV}$ 

## 3. Quantifying Each Exposure's Incremental Impact on Portfolio Risk

Having measured portfolio risk and assessed and ensured capital adequacy, as described in Section 2, the institution can then focus on increasing portfolio return/risk, which naturally and practically can only be done by taking incremental (marginal) actions on a select few exposures or borrowers at a time. Selecting which exposures to increase or decrease requires calculating each exposure's marginal impact on portfolio return/risk (defined as the increase in portfolio return/risk for a dollar more of that exposure), and then increasing those with the most favorable marginal impact on portfolio return/risk and decreasing those with the least favorable marginal impact on portfolio return/risk.

An exposure's marginal impact on portfolio return/risk:

- » Enables continual improvement of the portfolio from current state towards the optimal state (maximum return/risk), even as the optimal state changes in time as portfolio characteristics change;
- » Transcends limitations and conflicts of siloed measures, e.g. a return/risk measure calculated based on exposure's impact on a business line (sub-portfolio) may increase return/risk for that business line, but actually decrease return/risk for the overall institution (portfolio);
- » Is the most practical, actionable, and optimal measure for selecting which exposures to increase or decrease in order to continually increase portfolio return/risk.

While a tail measure of portfolio risk such as 99.9 percentile loss (i.e., EC or CVaR) focuses on extremely large but rare losses and is used to assess capital adequacy, shareholders are more focused on measuring and minimizing loss volatility (i.e., standard deviation of losses at future horizon), accounting for the full range of losses (small, medium, large, and extremely large) together with their respective probabilities. In this document, an exposure's marginal impact on portfolio tail risk (e.g. EC or a user-specified probability interval (e.g. 99.9 +/- 0.1 percentile) of the loss distribution) is termed "Tail Risk Contribution," whereas, an exposure's marginal impact on portfolio standard deviation (volatility) is termed "Risk Contribution". PortfolioStudio calculates and reports both: Risk Contributions and Tail Risk Contributions.

#### Risk Contribution: What is the increase in portfolio risk for a \$1 increase in exposure (notional)?

Exposure's Risk Contribution ("RC<sub>i</sub>"), defined as the increase in portfolio risk (i.e., standard deviation of portfolio value at horizon) for a \$1 increase in that exposure (notional), can be shown to equal the exposure's standalone risk per unit notional, i.e., standard deviation of exposure value at horizon per unit notional (aka "unexpected loss" or "UL<sub>i</sub>"), multiplied by the correlation between exposure value and portfolio value at horizon ("CORR<sub>i,p</sub>").

#### Figure 4 Risk contribution equation.

## Risk Contribution $(RC_i)$ = Increase in portfolio risk for a \$1 increase in exposure (notional) = $CORR_{i,p^*}UL_i$



Only the correlated portion of the exposure's standalone risk (UL<sub>i</sub>) contributes to and impacts the portfolio risk; the remaining portion of UL<sub>i</sub>, being uncorrelated with the portfolio, is diversified away. Exposure value's correlation with portfolio value (CORR<sub>i,p</sub>), and, resultantly, exposure's Risk Contribution (RC<sub>i</sub>), both increase as any of the following increase, all else equal:

- » Exposure's size, i.e., notional
- » Exposure's unexpected loss (UL<sub>i</sub>), i.e., standalone risk (standard deviation of exposure value at horizon) per unit notional; note: UL<sub>i</sub> generally increases as exposure's PD, LGD, and maturity increase
- » Exposure's R-squared, i.e., % of borrower's asset value risk that is systematic
- » Correlation between sector and region of the exposure with those of the portfolio

PortfolioStudio calculates each exposure's standalone risk (UL<sub>i</sub>) using its PD, LGD, maturity, etc., and then calculates portfolio risk measures (including UL<sub>p</sub> and EC) and instrument risk measures (including CORR<sub>i,p</sub> and RC<sub>i</sub>) using bottom-up, exposure-level,

GCorr-based correlated simulation, taking into account each exposure's notional, standalone risk per unit notional (driven mostly by PD, LGD, and maturity), as well as correlation with other exposures in the portfolio, regardless of the source of correlation or risk concentration, e.g. borrower, sector, or region, thus eliminating the need for any concentration add-on (relative to an assumed benchmark for a supposedly well-diversified portfolio). Exposure-level Risk Contributions can then be appropriately weighted and averaged across borrowers or sub-portfolios (or segments) to calculate borrower- or segment-level Risk Contributions.

#### Risk Concentrations: Which borrowers, sectors, and regions impact portfolio risk the most?

Risk Contribution (RC), the increase in portfolio risk impact for a \$1 increase in current exposure (notional), can be used to decide where to add/reduce the next \$ of exposure, identify risk concentrations and exposures (or sectors) that could cause large losses in a portfolio, and decide where to add/reduce exposure to increase diversification and reduce risk concentration and portfolio risk.

PortfolioStudio outputs RC together with PD, LGD, maturity, standalone risk (UL<sub>i</sub>), R-squared, notional, weight (notional as % of portfolio notional), and correlation with portfolio (CORR<sub>i,p</sub>) (collectively "risk drivers") for each exposure and segment and can be used to measure, manage, and price risk and take incremental (marginal) actions to reduce risk concentrations and increase portfolio return/risk, as discussed in later sections. The following figures list RC and risk drivers for the top15 borrowers and sectors ranked by RC. PortfolioStudio generates them in order to facilitate monitoring and analysis of risk concentrations, including borrower (name) and sector concentration, as shown below via illustrative examples for an example portfolio.

Figure 5 Sources of borrower concentration.

# Borrower Concentration: Top 15 Borrowers by Risk Contribution (RC)

Sub- Portfolio	Sector	Borrower	Notional	Risk Contribution	Correlation w/Portfolio	R-Squared	Stand-Alone Risk	PD	LGD	Maturity
		(Ranked by high RC)	(\$)	(% of Notional)	(Corr[VHi, VHp])	(Systematic Risk %)	(Std Dev as % of Notional)			(Year)
CRE	CRE Multi Family Housing	CRE 1371	3,968,000	9.80%	34.11%	34.35%	28.73%	32.85%	56.0%	3.16
CRE	CRE Multi Family Housing	CRE 1370	6,485,000	8.58%	32.85%	30.57%	26.12%	31.83%	56.0%	1.83
Large C&I	TRANSPORTATION EQUIPMENT	Large C&I 236	25,000,000	7.08%	39.73%	27.21%	17.81%	20.07%	25.0%	7.49
CRE	CRE Multi Family Housing	CRE 285	2,457,000	6.82%	34.59%	34.21%	19.72%	14.57%	53.0%	6.08
CRE	CRE Office	CRE 1432	3,527,000	6.82%	24.99%	28.03%	27.28%	24.05%	65.0%	2.16
CRE	CRE Office	CRE 1202	5,216,000	6.14%	26.59%	31.01%	23.08%	15.39%	63.0%	3.41
Large C&I	TRANSPORTATION EQUIPMENT	Large C&I 237	14,030,000	5.94%	30.43%	27.35%	19.52%	38.34%	25.0%	0.74
Large C&I	FINANCE	Large C&I 244	30,872,000	5.77%	43.97%	31.49%	13.11%	2.49%	50.0%	12.00
CRE	CRE Industrial	CRE 1080	2,064,000	5.71%	31.16%	34.49%	18.32%	8.66%	61.0%	6.08
CRE	CRE Retail Property	CRE 1530	10,877,000	5.65%	20.14%	19.22%	28.07%	41.83%	50.0%	2.75
CRE	CRE Multi Family Housing	CRE 335	8,795,000	5.27%	36.56%	35.39%	14.42%	7.35%	51.0%	5.91
CRE	CRE Multi Family Housing	CRE 1963	2,630,000	5.25%	32.56%	28.73%	16.13%	9.16%	51.9%	6.66
CRE	CRE Office	CRE 45	6,207,000	4.66%	23.45%	28.52%	19.89%	14.82%	63.0%	1.83
CRE	CRE Office	CRE 3	4,237,000	4.59%	23.32%	29.11%	19.70%	15.50%	63.0%	1.66
CRE	CRE Office	CRE 2095	3,138,000	4.45%	23.53%	29.71%	18.90%	14.45%	51.0%	7.49
		Total Portfolio		0.69%	10.44%	10.78%	4.93%	1.96%	38.5%	5.70

 Most of the high RC borrowers can be explained in terms of their very high PD, LGD, and R-Squared (Systematic Risk %) relative to Portfolio average PD of 1.96%, LGD of 38.5%, and R-Squared of 10.78%.

 One would expect the highlighted Finance sector "Large C&I 244" borrower, whose PD (2.49%) is much lower than that of the other borrowers on this list, to have a lower RC. But it has a higher RC because of its much higher "Correlation with Portfolio" (43.97%), which itself is driven by:

· Its large Book Exposure (\$30.8Million), which creates large idiosyncratic risk that is not diversified away

- Its high R-Squared, i.e. Systematic Risk % (31.49%)
- Reducing exposure to these high RC borrowers will reduce Risk Concentration and decrease Portfolio Risk (i.e. Portfolio Standard Deviation as a % of Portfolio Notional).

Figure 6 Sources of sector concentration.

# Sector Concentration: Top 15 Sectors by Risk Contribution (RC)

		<b>V</b>						
Sector	Notional	Risk Contribution	Correlation w/Portfolio		Stand-Alone Risk	PD	LGD	Maturity
(Ranked by high RC)	(% of Portfolio)	(% of Notional)	(Corr[VHi, VHp])	(Systematic Risk %)	(Std Dev as % of Notional)			(Year)
TRANSPORTATION EQUIPMENT	0.14%	6.67%	36.39%	27.26%	18.42%	26.64%	25.0%	5.07
FINANCE	0.23%	3.01%	25.34%	25.23%	8.08%	2.44%	42.3%	6.09
CRE Hotel Full Service	0.45%	2.39%	29.39%	49.02%	7.62%	5.10%	32.4%	4.14
CRE Multi Family Housing	4.60%	1.58%	23.16%	31.27%	6.09%	2.29%	49.1%	4.04
REALESTATE	6.64%	1.58%	15.56%	7.77%	10.06%	4.27%	39.2%	3.46
CONSTRUCTION	12.27%	1.50%	14.85%	6.45%	10.17%	4.39%	39.1%	3.42
CRE Office	2.16%	1.48%	17.18%	27.27%	7.35%	3.50%	49.3%	4.35
CRE Retail Property	1.35%	1.40%	18.31%	28.00%	6.73%	3.62%	46.0%	3.69
CRE Industrial	1.75%	1.36%	18.55%	31.26%	6.53%	4.09%	49.8%	3.36
MINING	0.64%	1.30%	20.67%	29.37%	5.30%	1.73%	39.7%	2.83
CONSUMER PRODUCTS	0.35%	1.26%	23.48%	24.33%	4.98%	2.04%	26.4%	3.51
LESSORS	1.98%	1.06%	10.50%	5.03%	8.17%	3.75%	40.1%	3.53
AEROSPACE & DEFENSE	0.35%	1.03%	20.19%	35.07%	4.23%	1.66%	35.2%	2.17
TELEPHONE	0.84%	0.78%	16.28%	25.59%	3.71%	4.76%	28.8%	2.46
BUSINESS SERVICES	3.23%	0.71%	10.99%	10.70%	6.02%	2.28%	37.1%	2.78
Total Portfolio	100.00%	0.69%	10.44%	10.78%	4.93%	1.96%	38.5%	5.70

Comparing Transportation Equipment and Construction:

Transportation Equipment has a lower MTM (0.14% vs. 12.27%) but higher RC (6.67% vs. 1.5%), which is driven by higher PD (26.64% vs. 4.39%) and higher R-Squared, i.e. Systematic Risk % (27.26% vs. 6.45%).

• The borrowers in Transportation Equipment are large C&I firms, which have high Systematic Risk %.

· Most borrowers in Construction are small SME firms, which have very low Systematic Risk %.

 Reducing exposure to Transportation Equipment will be more effective in reducing Risk Concentration and decreasing Portfolio Risk (i.e. Portfolio Standard Deviation as a % of Portfolio Notional).

#### Risk Attribution: Which factors cause and explain exposure's Risk Contribution level?

Users often want to understand why an exposure's Risk Contribution (RC) is higher or lower and what drives the changes. Users can use PortfolioStudio outputs to better understand, communicate, and act upon the reported risk measures for any exposure via:

- i. An annotated flowchart (see Figure 7) relating the inputs and risk drivers to intermediate and final risk outputs and showing their levels.
- ii. A table (see Figure 8) comparing the risk drivers and outputs of the chosen exposure with those of the relevant sector, geography, segment, and portfolio.
- iii. An automated commentary (see Figure 8) describing the dynamics in simple business terms.

Figure 7 Risk attribution flowchart.

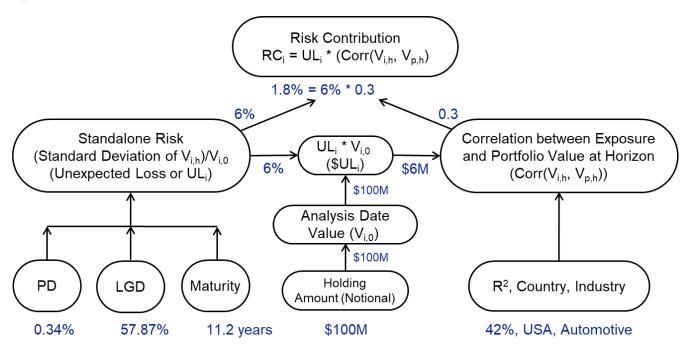


Figure 8 Risk attribution comparison table and commentary.

#### **Risk Attribution: Comparison Table & Commentary**

	Notional (% of Portfolio)	Risk Contribution (per \$ Notional)	Correlation with Portfolio (CORR <sub>i.p</sub> )	Systematic Risk Fraction (RSQ)	Standalone Risk per \$ Notional (UL)	PD	LGD	Maturity (years)
Borrower: Nikola Inc.	1.00%	1.80%	0.30	45.22%	6.00%	0.34%	57.0%	11.2
Industry: Automotive	10.00%	3.60%	0.40	50.00%	9.00%	0.68%	58.0%	5.32
Segment: Commercial	40.00%	1.50%	0.30	35.00%	5.00%	0.25%	50.0%	5.00
Portfolio Total	100.00%							
Portfolio Average		2.31%	0.33	35.00%	7.00%	0.50%	50.00%	5.10

### **Risk Attribution: Commentary**

- » Nikola Inc. has a PD of 0.34%, compared to PD of 0.68% for Automotive, 0.25% for Commercial, and 0.5% for portfolio.
- » Nikola Inc. has an LGD of 57% compared to 58%, 50, and 50% for Automotive, Commercial, and portfolio respectively.
- » Nikola Inc.'s maturity is 11.2 years compared to 5.32, 5, & 5.1 years for Automotive, Commercial, & portfolio respectively.
- » As a result of its PD, LGD, and maturity, Nikola Inc.'s Standalone Risk (UL) is 6% compared to 9%, 5%, and 7% for Automotive, Commercial, and portfolio respectively.
- » Nikola Inc.'s R-Squared (systematic risk fraction) is 45% compared to 50%, 35%, and 35% for Automotive, Commercial, and portfolio respectively.
- » Nikola Inc.'s commitment weight of 1%, UL of 6%, and R-squared of 45%, together with its industry automotive (with a 10% weight) results in a correlation with portfolio of 0.3 compared to .4, .3, and .33 for Automotive, Commercial, and portfolio respectively, causing its RC per \$ commitment to be 1.8% (= UL \* correlation w/ portfolio = 6% x 0.3) compared to 3.6%, 1.5%, and 2.31% for Automotive, Commercial, and portfolio respectively.

To review, PortfolioStudio can be used to (i) calculate each exposure's marginal impact on portfolio risk, (ii) identify sources of risk concentration and diversification, and (iii) better understand, communicate, and act upon the reported risk measures for any exposure, borrower, or segment. We now turn to the next key step in increasing portfolio return/risk.

#### 4. Setting Limits to Prevent Excessive Risk Concentrations

Exposure- and segment-level marginal return/risk measures, calculated as expected return divided by Risk Contribution (RC), can be used not only to increase portfolio return/risk via asset selection, as described in Section 5, but also to monitor marginal return/risk and prevent excessive risk concentrations by rejecting deals or reducing exposures that have high RC and low marginal return/risk and that would decrease portfolio return/risk. Doing so requires reliable tools and metrics and unflinching discipline.

As a practical, conservative alternative and/or supplementary approach, and as a backstop to the aforementioned marginal return/risk-based monitoring and limit setting, most institutions also calculate and enforce absolute notional limits in order to prevent excessive risk concentrations and to keep risk levels consistent with risk appetite and risk strategy. Limits based on notional exposure are a good start, but they have significant limitations:

- » They do not account for borrower- or segment-specific risk.
- » They do not account for the impact of borrower's or segment's correlation and concentration relative to the portfolio.
- » They are more qualitative and subjective, and thus prone to subjective bias, and not easily defendable.
- » They involve a manual process and are difficult to update frequently.
- » They are not dynamic; they generally remain fixed despite changes to portfolio holdings and profile.

PortfolioStudio overcomes these limitations by using a quantitative and risk-sensitive approach. It uses analytic formulas, together with Monte Carlo simulation results, to calculate the relationship ("Risk vs. Notional Curve") between a borrower's or segment's "Notional Weight" and the corresponding "Risk Contribution Weight" for varying levels of borrower's or segment's Notional Weight, assuming no change to the rest of portfolio. Risk Contribution Weight is defined as a borrower's or segment's notional-weighted Risk Contribution, as a fraction of the sum of notional-weighted Risk Contribution of all exposures in the portfolio.

#### Segment Limits: What is the notional limit given a limit on each segment's Risk Contribution?

Given a set of user-specified Segment Risk Contribution Weight Limits and using the aforementioned Risk vs. Notional Curve, PortfolioStudio calculates the corresponding set of "Risk-Adjusted Notional Limits" for each segment, assuming no change to the rest of the portfolio. Users can specify the Segment Risk Contribution Weight Limits to be the same or different across segments. In addition to the GCorr industry and country segmentations, PortfolioStudio allows for up to four user-defined segmentations for segment-level reporting, what-if analysis, stress testing, optimization, and limit setting.

Figure 9 Limit setting using Risk vs. Notional Curves for segments in an example portfolio.

## Risk vs. Notional Curve (for a Sample Portfolio)

Risk Contribution Weight Limits can vary by segments, e.g. 30% for CRE and 20% for Commercial. Given an RC Weight Limit, diversifying segments will get larger Risk-Adjusted Notional Limits, reflecting each segment's impact on portfolio risk, taking account of portfolio correlations and risk concentrations.

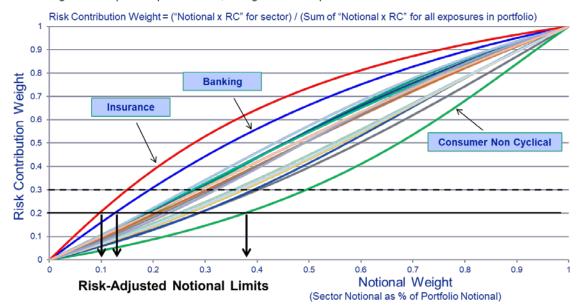


Figure 10 Limit setting via PortfolioStudio.

Group Names	Notional (\$)	Risk Contribution Weights (%)	Correlation with Portfolio (%)	Risk Contribution Limits (0-100%) 🙎	Notional Limits (\$)	Weight Limits 🙎	Evenly Assign Risk Contribution Limi	its (0 100) 10.00% ?
APPAREL & SHOES	1,563,135	0.48%	16.71%	10.00%	15,042,685	23.04%	4	•
AUTOMOTIVE	291,942	0.94%	23.01%	10.00%	1,826,807	3.42%		,
BANKS AND S&LS	4,799,908	9.45%	43.31%	10.00%	5,010,825	9.63%		?
BUSINESS PRODUCTS WHSL	1,697,490	0.18%	8.80%	10.00%	25,449,689	33.67%	Calculate Risk-based	Limits
BUSINESS SERVICES	1,555,601	1.82%	26.55%	10.00%	5,713,987	10.21%		
CHEMICALS	2,841,340	8.49%	37.37%	10 00%	3,185,339	6.11%		
COMPUTER SOFTWARE	2,376,424	14.47%	45.65%	10.00%	1,833,363	3.58%		
CONSTRUCTION	3,143,736	4.28%	34.07%	10.00%	5,995,676	10.97%		
CONSTRUCTION MATERIALS	505,437	0.16%	5.97%	10.00%	6,113,954	10.65%		
ONSUMER PRODUCTS RETL/WHSL	1,407,632	8.92%	34.99%	10.00%	1,515,061	2.92%		- 5,0
CONSUMER SERVICES	1,994,950	5.89%	32 75%	10 00%	2,881,193	5.47%		- 5,0
ELECTRICAL EQUIPMENT	1,797,960	6.19%	35.04%	10.00%	2,539,658	4.83%	APPAREL & SHOES	S
ELECTRONIC EQUIPMENT	713,151	0.92%	24.49%	10.00%	4,740,148	8.49%	AUTOMOTIVE	E
FINANCE COMPANIES	1,543,834	1.35%	15.43%	10.00%	5,318,181	9.57%	BANKS AND S&L	5
FINANCE NEC	1,322,315	1.43%	31.12%	10.00%	6,653,838	11.64%	BUSINESS PRODUCTS WHS	L
FOOD & BEVERAGE	3,003,492	2.27%	24.02%	10.00%	8,544,282	14.90%	BUSINESS SERVICES	5
FOOD & BEVERAGE RETL/WHSL	1,442,066	0.70%	16.60%	10.00%	9,573,506	15.97%	CHEMICAL	S
HOTELS & RESTAURANTS	1,345,933	6.45%	32.27%	10.00%	1,806,057	3.45%	COMPUTER SOFTWARE	E
INVESTMENT MANAGEMENT	640,325	0.26%	8.43%	10.00%	6,496,732	11.26%	CONSTRUCTION	
MACHINERY & EQUIPMENT	811,776	0.37%	19.82%	10.00%	11,357,474	18.21%	CONSTRUCTION MATERIAL	s
MEASURE & TEST EQUIPMENT	1,354,744	0.38%	15.49%	10.00%	15,313,935	23.28%	CONSUMER PRODUCTS RETL/WHS	
MEDICAL SERVICES	1,563,447	1.18%	18.27%	10.00%	6,822,787	11.95%	CONSUMER SERVICES	
MISCELLANEOUS	686,578	0.39%	24,64%	10.00%	10,751,891	17.37%	FLECTRICAL EQUIPMENT	
OIL, GAS & COAL EXPL/PROD	2,042,306	9.82%	38.96%	10.00%	2,068,279	3.99%	ELECTRONIC EQUIPMENT	
PAPER	1,595,906	5.54%	28.93%	10.00%	2,334,510	4.44%	FINANCE COMPANIES	
PHARMACEUTICALS	369,501	0.31%	12.92%	10.00%	4,411,050	7.90%	FINANCE NEC	
PUBLISHING	1,023,330	0.27%	8.26%	10.00%	9,588,906	15.88%	FOOD & BEVERAGE	
REAL ESTATE	1,025,567	1.25%	26.11%	10.00%	5,295,996	9.44%	FOOD & BEVERAGE RETL/WHSI	
REAL ESTATE INVESTMENT TRUSTS	1,733,533	1.35%	19.47%	10.00%	6,974,125	12.22%	HOTELS & RESTAURANTS	
STEEL & METAL PRODUCTS	1,803,016	1.18%	17.08%	10.00%	7,519,003	13.07%		
TELEPHONE	881,813	1.34%	16.65%	10.00%	3,223,701	5.95%	INVESTMENT MANAGEMENT	
TRANSPORTATION	1,191,793	0.93%	16.04%	10.00%	5,929,023	10.48%	MACHINERY & EQUIPMENT	
TRUCKING	479,997	0.04%	7.95%	10.00%	28,431,282	35.64%	MEASURE & TEST EQUIPMENT	
UTILITIES, ELECTRIC	1,274,524	0.98%	13.42%	10.00%	5,336,027	9.55%	MEDICAL SERVICES	5

#### Borrower Limits: What is the notional limit given a limit on each borrower's Risk Contribution?

Using a similar approach as that for limit setting for segments described above, PortfolioStudio can also calculate Risk-Adjusted Notional Limits for the top-20 borrowers ranked by notional-weighted Risk Contribution.

To review, this section describes how PortfolioStudio can be used to set Risk-Adjusted Notional Limits given a user-specified limit on segment's or borrower's Risk Contribution Weight. This quantitative risk-sensitive limit setting can be performed periodically using PortfolioStudio to reflect changes to portfolio holdings and their risk characteristics, as well as changes to risk appetite. In the next section, we describe the next key step in increasing portfolio return/risk.

## 5. Increasing/Decreasing Credit Exposure to Increase Portfolio Return/Risk

Prior sections focused on risk, i.e., the denominator of return/risk ratio. In this section and the next, we describe how PortfolioStudio can be used to calculate and increase portfolio return/risk and stakeholder value. We also discuss relevant best practices and ways to overcome implementation challenges.

#### Asset Selection: Which exposures should be increased/decreased to increase portfolio return/risk?

We can show that exposure's (standalone) expected return equals that exposure's marginal contribution to portfolio expected return, regardless of exposure notional and portfolio characteristics. Thus, an exposure's Sharpe Ratio, defined as "expected return / Risk Contribution," is a marginal measure quantifying exposure's marginal impact on portfolio return/risk and can be used to decide which exposures to increase/decrease in order to increase portfolio return/risk. Portfolio return/risk can be increased by increasing exposures with Sharpe Ratios higher than the portfolio Sharpe Ratio and decreasing exposures with Sharpe Ratios lower than portfolio Sharpe Ratio. Portfolio Sharpe Ratio changes with the portfolio, and it can be used as a dynamic hurdle rate, without the need to compare exposure's Sharpe Ratio with an exogenously imposed hurdle rate, which often is static and not portfolio-sensitive, despite changes in the portfolio. Furthermore, using an exogenously imposed hurdle rate is superfluous (relative to using portfolio Sharpe Ratio as the hurdle rate) and may lead to asset selection that can actually decrease the portfolio's Sharpe Ratio.<sup>3</sup>

PortfolioStudio calculates and reports each exposure's and segment's expected return (or credit earnings based on CECL or IFRS 9) and Sharpe Ratio, together with Risk Contribution, correlation with portfolio, and other risk measures discussed previously, and which can be used to selectively increase/decrease exposures and increase portfolio return/risk. If regulatory or capital structure requirements appear to constrain the said asset selection, the institution can overcome such apparent constraints by scaling down (decreasing) all current exposures in the portfolio, or by raising additional capital at market rates. In either case, and to the extent there is no gain/loss relative to market price, the institution can continue to increase portfolio return/risk by rebalancing portfolio using aforesaid marginal return/risk contributions, while simultaneously and independently meeting regulatory and/or economic capital requirements.

# Optimal Allocation to Segments: Which segments should be grown/reduced and by how much, in order to maximize portfolio return/risk (Sharpe Ratio)?

Consistent with the Sharpe Ratio-based asset selection discussed previously, and utilizing segment level results from Monte Carlo simulation, PortfolioStudio's Deal Allocation application quickly calculates segment level optimal investment amounts that maximize portfolio return/risk, given user-specified investment budget and segment level buy/sell limits. Users can choose to optimize the portfolio via any of the four strategies:

- » Mean-Variance: minimize portfolio return volatility while meeting a target expected return
- » Minimum Volatility: minimize portfolio return volatility across all expected return levels
- » Maximum Sharpe Ratio: maximize portfolio Sharpe Ratio, i.e., expected return/return volatility
- » Risk Parity: to the extent possible, equalize each segment's notional-weighted Risk Contribution

Each of these optimization strategies can be performed on the portfolio with or without new deals. Each strategy can also be performed under user-specified stress scenarios. If regulatory or capital structure requirements appear to constrain the said optimization, the institution can overcome such apparent constraints by scaling down (decreasing) all current exposures in a portfolio, or by raising additional capital at market rates. In either case, and to the extent there is no gain/loss relative to market price, the institution can continue to increase portfolio return/risk by rebalancing portfolio using aforesaid marginal return/risk contributions, while simultaneously and independently meeting regulatory and/or economic capital requirements.

<sup>&</sup>lt;sup>3</sup> For example, an exposure "i" with Sharpe Ratio (SR<sub>i</sub>) greater than an exogenously imposed hurdle rate (HR) but less than portfolio Sharpe Ratio (SR<sub>p</sub>), i.e. HR < SR<sub>i</sub> < SR<sub>p</sub>, will pass the hurdle but will actually decrease portfolio Sharpe Ratio. Similarly, an exposure "i" with Sharpe Ratio (SR<sub>i</sub>) less than an exogenously imposed hurdle rate (HR) but greater than portfolio Sharpe Ratio (SR<sub>p</sub>), i.e. HR > SR<sub>i</sub> > SR<sub>p</sub>, will fail the hurdle but will actually increase portfolio Sharpe Ratio.

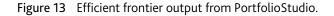
Allows custom Allows users to set new funding amount. segmentation. Deal Allo er Limits (S) Upper Limits (S) ? \$50,000,000 Group Nan it (S) 3,**9**57,529 cto < Sector 1 2.14% Inf 3,000,000 Sector O 2.74% Inf 3,000,000 2.61% Target Earnings Sector D 3.22% Inf 3.041.242 Set Target Earnings to Portfolio Average 2,000,000 2.93% Sector E 700,000 2.47% 6.339.401 Sector F Inf .000.000 3.55% Inf 2.000.000 Sector G Optimal Deal Allocation Sector H 2.34% 5.000.000 5.000.000 Sector I 2 16% Inf 2.461.533 Sector J 3.19% 400,000 4,000,000 4,000,000 Minimum Volatility Allocation Maximize Sharpe Rati Sector K 3.07% Inf 176,804 Risk Parity Allocation Sector L 2.25% 7,000,000 6,275,060 Sector M 2.05% 00,000 6,000,000 1,000,000 Sector N 2.42% 000,00 Inf 500,000 Portfolio Earnings Sharpe Ratio 1.15 2.50% Inf 5,769,177 Expected Earnings (\$) Sector O \$2,657,231 2.34% 4,111,906 Expected Earnings (%) 2.61% Sector Sector Q 3.28% Inf 2,367,348 Earnings Volatility (\$) \$2,304,949 1.90% Inf Earnings Volatility (%) 2.26% Sector R

Figure 11 Segment-level optimization and deal allocation via PortfolioStudio.

Figure 12 Increase in portfolio return/risk after performing deal allocation and portfolio optimization via PortfolioStudio.

	Before Optimization	After Optimization	Change
Holding Amount (Billion)	\$50.434	\$60.435	19.83%
Expected Return (ER)	1.73%	1.90%	9.58%
Unexpected Loss (UL)	1.90%	1.80%	-5.26%
Economic Capital (EC)	7.89%	8.21%	4.08%
Sharpe Ratio (ER/UL)	0.91	1.05	15.67%

PortfolioStudio also calculates and plots the efficient frontier, showing the full range of possible return and risk levels for the portfolio, including the point (shown as a red cross in Figure 16) corresponding to the maximum Sharpe Ratio.





To review, this section describes how PortfolioStudio can be used to increase portfolio return/risk by Sharpe Ratio-based asset selection and segment-level portfolio optimization. The following section describes the next key step in increasing portfolio return/risk.

## 6. Pricing and Sizing New Deals to Increase Portfolio Return/Risk

The prior section focused on how PortfolioStudio can be used to decide what to buy, sell, or hold to increase portfolio return/risk. What is equally important is to do so at the right price and with the correct size and terms. Sizing and structuring deals appropriately become even more important when the institution is a price-taker rather than a price-setter. PortfolioStudio's deal pricing module enables institutions to quickly calculate return and risk measures for a new deal or a basket of new deals, considering the deal's standalone risk (driven mostly by PD, LGD, and maturity), as well as portfolio correlation and risk concentrations. The module has an intuitive user interface that enables deal makers to conveniently specify borrower characteristics (e.g. notional, PD, LGD, etc.) and deal terms and conditions (e.g. coupon, maturity, etc.). Users can also choose to incorporate the impact of CECL and IFRS 9 provisions or macroeconomic/stress scenarios into deal pricing.

# Risk-Based Pricing: What is the deal's Risk Contribution and Sharpe Ratio, i.e., deal's impact on portfolio return/risk, taking account of deal's notional, standalone risk, and correlation with the portfolio?

Leveraging key metrics from the original portfolio analysis, PortfolioStudio can quickly (within seconds and at the point of origination) calculate marginal return and risk statistics, including expected return (or credit earnings), Risk Contribution (RC), Sharpe Ratio, and incremental portfolio economic capital for new deals. Alternately, given RC for a deal, one can calculate the pricing required to meet or exceed portfolio Sharpe Ratio or any user-specified hurdle rate. Users can also calculate return/risk measures by substituting PortfolioStudio's expected return (numerator) with a user-specified expected return, which should be a marginal measure, in order to remain consistent with Risk Contribution (denominator), which is marginal.

lotional (\$)	Maturity Date (MM/DD/YYYY)	Counterparty ID	Coupon (%)	<b>Coupon Frequency</b>	1 Year PD (%)	1 Year LGD (%)	Currency	Other Net Income (9
\$10,000	12/23/2022	069842_2014_ED	1.00%	Quarterly	5.00%	50.00%		2.00%
\$200,000	12/24/2022	446150_2014_ED	2.00%	Annually	4.00%	50.00%		1.00%
\$164,000	12/25/2022	501242_2014_ED	3.00%	Semi-Annually	3.00%	50.00%		3.00%
\$53,533	12/26/2022	G10195_2014_ED	4.00%	Semi-Annually	2.00%	50.00%		0.00%
\$111,111	12/27/2022	G11876_2014_ED	5.00%	Monthly	1.00%	50.00%		3.00%
\$10,000	12/28/2022	G16087 2014 ED	1.00%	Quarterly	5.00%	50.00%		2.00%
arnings Sharpe R	latio RORAC RW	Earnings Risk Contribu Earnings Risk Contribu Economic Capital (TS,	ution (%) ^ ution (\$) %)	Spec	Expected Interes		?	
arnings Sharpe R	latio RORAC RW	Earnings Risk Contribu Earnings Risk Contribu	xtion (%) ^ xtion (\$) %) \$) %)	Spec		t Income (%) Allowance Impact	Time Va	lue of Loss Allowance 2.00%
arnings Sharpe R	atio RORAC RW	Earnings Risk Contribu Earnings Risk Contribu Economic Capital (TS, Economic Capital (TS, Economic Capital (EL,	xtion (%) ^ xtion (\$) %) \$) %)	Spec	Expected Interes ust Return for Loss	t Income (%) Allowance Impact		
arnings Sharpe R	atio RORAC RW	Earnings Risk Contribu Earnings Risk Contribu Economic Capital (TS, Economic Capital (TS, Economic Capital (EL, Economic Capital (EL, RWA	xtion (%) ^ xtion (\$) %) \$) %)	Spec	Expected Interes ust Return for Loss Yes	t Income (%) Allowance Impact / Loan Pricing	Time Va	

#### Figure 14 Risk-based deal pricing via PortfolioStudio.

Sections 2–6 describe how PortfolioStudio can be used to efficiently perform the five key steps to increasing portfolio return/risk. Section 7 describes additional PortfolioStudio functionality.

## 7. PortfolioStudio: Additional Functionality

#### What-If Analysis

PortfolioStudio's what-if analysis application allows users to modify inputs, e.g. by scaling or shifting PDs, for certain or all segments in a portfolio and examine the impact on portfolio risk statistics. It provides a convenient way for users to perform sensitivity analysis without creating and loading new portfolios.

#### Figure 15 What-If analysis inputs.

hat-if Analysis				
Variable Name	Scale	Shift	Segmentation Level	Segmentation Name
Notional		100000	Industry	AUTOMOTIVE
Coupon		0.01	Country	AUSTRALIA
PD Term Structure	1.10		User Defined Sector 1	A1
Maturity		1	All	

#### Figure 16 What-If analysis results.

	Previous Portfolio Results	Updated Portfolio Results
Holding Amount	\$1,000,000,000	\$2,000,000,000
Expected Earnings	3.2%	1.3%
Expected Interest Income - Default Loss	3.4%	8.8%
Expected Interest Income	4.0%	9.5%
Earnings Volatility	1.6%	2.7%
Earnings at Risk	6.8%	19.6%
Earnings Sharpe Ratio	2.1	3.2
Economic Capital (TS)	8.6%	21.5%
Economic Capital (EL)	9.7%	20.5%
Risk-Based Capital (RBC)	NA	NA
RORAC	0.4	0.1
Current Loss Allowance	NA	NA
Average Annualized PD to Maturity	1.0%	1.1%
Average LGD	50.0%	50.0%
Average Maturity	2.2	2.1
Average RSQ	22.7%	21.9%

#### **Risk Dashboard**

PortfolioStudio's Risk Dashboard provides an executive view of all relevant risk measures on one screen. Users can choose from pre-defined templates with the ability to move, select, or remove items. Clicking any item on the Risk Dashboard launches a detailed view or corresponding module, most of which have been described previously in this document.

#### Figure 17 Risk dashboard.

Portfolio Risk Breakdown

Segment	EAD (\$bn)	EAD	Risk Contribu (% of Portfolio)	ition (RC) (Per \$EAD)	PD	LGD
Corporate	6.287	55%	35.0%	1.51%	0.30%	57.9%
CRE	2.033	18%	18.0%	1.94%	0.50%	23.8%
Retail	2.097	18%	12.0%	1.31%	0.40%	20.7%
Structured	1.031	9%	35.0%	6.44%	1.70%	41.4%
Portfolio	11.448	100%	100%	1.94%	0.50%	43.5%

#### Top 20 Borrowers by Risk Contribution (RC)

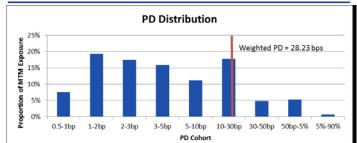
Sector	EAD	Risk Contribu (% of Portfolio)	ition (RC) (Per \$EAD)	Concentration Coefficient (CC)	PD	LGD	Maturity (Years)
Borrower1	1.8%	4.8%	7.51%	7.51%	0.30%	57.9%	3.3
Borrower2	2.2%	3.7%	4.94%	3.94%	0.50%	23.8%	5.1
Borrower3	1.8%	3.2%	5.31%	3.31%	0.40%	20.7%	2.2
Borrower4	1.5%	2.5%	5.00%	2.44%	1.70%	41.4%	2.8
Portfolio	100%	100%	1.94%	1.94%	0.50%	43.5%	3.2

#### Top 20 Sectors by Risk Contribution (RC)

Country	EAD	Risk Contribu (% of Portfolio)	ition (RC) (Per \$EAD)	Concentration Coefficient (CC)	PD	LGD	Maturity (Years)
Sector 1	10%	22.1%	5.51%	7.51%	0.30%	57.9%	3.3
Sector 2	15%	17.7%	2.94%	3.94%	0.50%	23.8%	5.1
Sector 3	10%	14.2%	3.31%	3.31%	0.40%	20.7%	2.2
Sector 4	8%	11.1%	3.00%	2.44%	1.70%	41.4%	2.8
Portfolio	100%	100%	1.94%	1.94%	0.50%	43.5%	3.2

#### Top 20 Countries by Risk Contribution (RC)

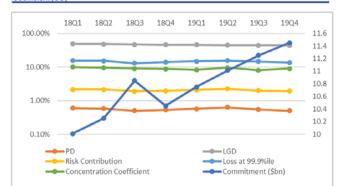
Country	EAD	Risk Contribu (% of Portfolio)	ition (RC) (Per \$EAD)	Concentration Coefficient (CC)	PD	LGD	Maturity (Years)
Country 1	10%	22.1%	5.51%	7.51%	0.30%	57.9%	3.3
Country 2	15%	17.7%	2.94%	3.94%	0.50%	23.8%	5.1
Country 3	10%	14.2%	3.31%	3.31%	0.40%	20.7%	2.2
Country 4	8%	11.1%	3.00%	2.44%	1.70%	41.4%	2.8
Portfolio	100%	100%	1.94%	1.94%	0.50%	43.5%	3.2



# O.4 Weighted TTM = 10.28 yrs 0.35 0.35 0.25 0.35 0.15 0.15 0.05 0.15 0.05 0.05 0.19r 1-2yr 2-3yr 3-5yr 5-10yr 10-20yr 20-40yr 40-110yr TTM Cohort

#### Portfolio Risk Trend (last 8 quarters)

	18Q1	18Q2	18Q3	18Q4	19Q1	19Q2	19Q3	19Q4
EAD (\$bn)	10.01	10.25	10.85	10.45	10.75	11.01	11.25	11.45
PD	0.60%	0.58%	0.50%	0.53%	0.57%	0.63%	0.55%	0.50%
LGD	48.5%	47.5%	46.5%	45.5%	45.5%	44.5%	44.0%	43.5%
Risk Contribution	2.14%	2.15%	1.89%	1.97%	2.09%	2.22%	1.99%	1.94%
Loss at 99.9%ile	15.5%	15.2%	13.0%	14.0%	14.9%	15.5%	14.5%	13.5%
Concentration Coefficient (CC)	9.9%	9.5%	9.0%	8.7%	8.2%	9.5%	8.0%	9.0%



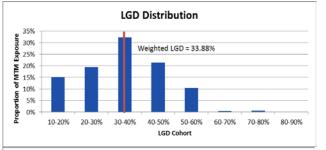
#### **Concentration Limit Breaches:**

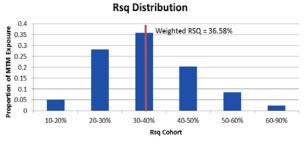
Sector Limit	Breach: None     Watch: Sector1 EAD of 1.14B close to limit of 1.2B
Borrower Limit	Breach: Borrower1 EAD of 220M exceeds limit of 200M

#### New Deals:

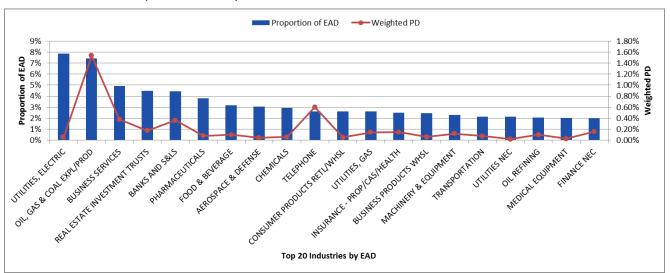


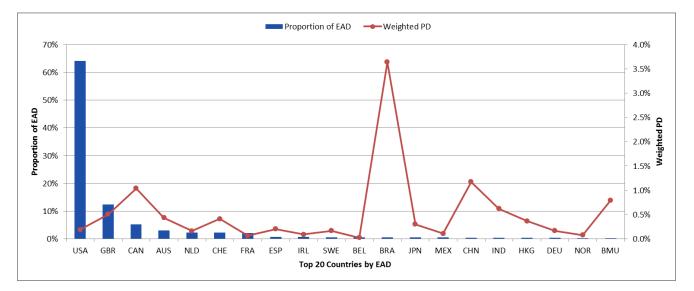
•100M, 5-year Term Loan 3.75% maturing 12/31/2025 •Rating AA, PD 0.25%, LGD 50%, Expected Return: 5% •RegCap: 10M, EC: 11M, Sharpe Ratio: .5





# Risk Dashboard (continued)





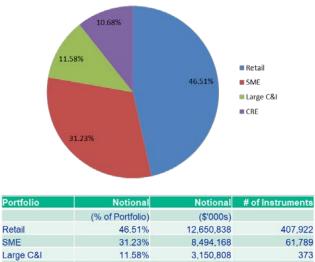
# Risk Dashboard (continued)





# Risk Dashboard (continued)

Portfolio Composition (Notional)

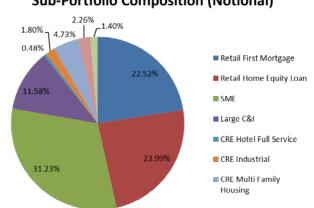


2,905,110

27,200,924

10.68%

100.00%



	Portfolio	Notional	Notional
		(% of Portfolio)	(\$'000s)
	Retail	46.51%	12,650,838
	First Mortgage	22.52%	6,125,363
	Home Equity Loan	23.99%	6,525,475
	SME	31.23%	8,494,168
	Large C&I	11.58%	3,150,808
truments	CRE	10.68%	2,905,110
	Hotel Full Service	0.48%	130,471
407,922	Industrial	1.80%	490,905
61,789	Multi Family Housing	4.73%	1,286,432
373	Office	2.26%	615,381
2,225	Retail Property	1.40%	381,921
472,309	Total Portfolio	100.00%	27,200,924

Sub-Portfolio	МТМ	Risk Contribution		R-Squared	Stand Alone Risk		LGD	Maturity
	(% of Portfolio)	(	(Correlation [VHi,VHp])	(Systematic Risk %)	(StdDev as % of MTM)			(Year)
Retail	47.02%	0.22%	5.65%	4.70%	2.91%	0.95%	35.38%	8.14
SME	31.12%	1.06%	11.19%	5.03%	8.06%	3.23%	40.19%	3.42
Large C&I	11.54%	0.84%	18.71%	33.19%	3.25%	1.60%	38.02%	3.47
CRE	10.32%	1.53%	20.76%	30.78%	6.58%	3.15%	48.16%	3.95
Total Portfolio	100.00%	0.69%	10.44%	10.78%	4.93%	1.96%	38.50%	5.70

Sub-Portfolio	МТМ	Risk Contribution	Correlation w/Portfolio	R-Squared	Stand Alone Risk	PD	LGD	Maturity
	(% of	(% of MTM)	(Correlation	(Systematic	(StdDev as %			(Year)
	Portfolio)		[VHi,VHp])	Risk %)	of MTM)			
Retail	47.02%	0.22%	5.65%	4.70%	2.91%	0.95%	35.38%	8.14
First Mortgage	23.00%	0.14%	6.51%	6.35%	1.59%	1.26%	8.10%	8.28
Home Equity Loan	24.01%	0.30%	4.83%	3.12%	4.17%	0.65%	61.51%	8.00
SME	31.12%	1.06%	11.19%	5.03%	8.06%	3.23%	40.19%	3.42
Large C&I	11.54%	0.84%	18.71%	33.19%	3.25%	1.60%	38.02%	3.47
CRE	10.32%	1.53%	20.76%	30.78%	6.58%	3.15%	48.16%	3.95
Hotel Full Service	0.45%	2.39%	29.39%	49.02%	7.62%	5.10%	32.43%	4.14
Industrial	1.75%	1.36%	18.55%	31.26%	6.53%	4.09%	49.83%	3.36
Multi Family Housing	4.60%	1.58%	23.16%	31.27%	6.09%	2.29%	49.14%	4.04
Office	2.16%	1.48%	17.18%	27.27%	7.35%	3.50%	49.35%	4.35
Retail Property	1.35%	1.40%	18.31%	28.00%	6.73%	3.62%	46.04%	3.69
Total Portfolio	100.00%	0.69%	10.44%	10.78%	4.93%	1.96%	38.50%	5.70

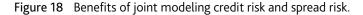
## Sub-Portfolio Composition (Notional)

CRE

Total Portfolio

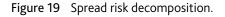
#### Spread Risk

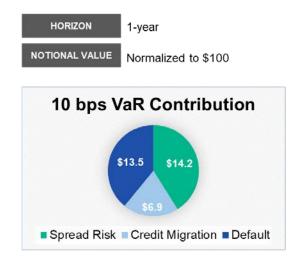
PortfolioStudio's spread-risk module allows for simultaneously modeling of credit risk and spread risk and facilitates spread-risk decomposition.

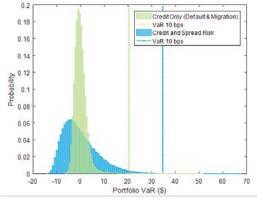




- » Ability to set more accurate and granular risk correlation parameters
- » Straightforward risk decomposition
- » Avoids double counting
- » Improved operational efficiency







Negative correlation between credit quality changes and price-of-risk changes ensures the joint-loss distribution is wider

Straightforward spread risk	Select Portfelio Run		Select Portfolio Run		Select Portfolio Run 3
decomposition	Default/Risk-Demo-5	<b>/2</b> vs	Default+Migration Ris	sk vs	Default+Migration+Spread Risk
Number of Monte Carlo Simulations	100000	=	100000	=	100000
Target Probability	0.05%	=	0.05%	=	0.05%
Horizon (year)	1.00	=	1.00	=	1.00
Accounting Rule	Fair Value		Fair Value		Fair Value
Spread Valuation	Static Lambda		Static Lambda		Stochastic Lambda
Default/Non-Default Mode	TRUE		FALSE		FALSE
Holding Amount	\$51,824,502	=	\$51,824,502	=	\$51,824,502
Expected Interest Income - Default Loss	2.18%	=	2.18%	=	2.18%
Earnings Volatility	1.26%	<	2.32%	<	4.39%
Economic Capital (TS)	4.51%	<	7.60%	<	14.84%
Economic Capital (EL)	6.82%	<	9.92%	<	17.39%
	Default Risk		Default +		Default + Migration
	Only		Migration Risk		+ Spread Risk

#### 8. Summary

Institutions holding credit portfolios can increase stakeholder value by increasing return/risk, while also ensuring capital adequacy and regulatory compliance. This process, for the most part, requires five key steps:

- 1. Measuring portfolio risk and ensuring capital adequacy
- 2. Quantifying each exposure's marginal impact on portfolio risk
- 3. Setting limits to prevent excessive risk concentrations
- 4. Increasing/decreasing credit exposure to increase portfolio return/risk
- 5. Pricing and sizing new deals to increase portfolio return/risk

Designed with the business user in mind, and as described in this document, Moody's Analytics PortfolioStudio is an agile efficient solution that helps institutions perform these five key steps and increase portfolio return/risk.

## References

Bohn, Jeffery and Stephen Kealhofer, "Portfolio Management of Default Risk." Moody's KMV Whitepaper, 2001.

Huang, Jimmy, Mariano Lanfranconi, Nihil Patel, and Libor Pospisil, "Modeling Credit Correlations: An Overview of the Moody's Analytics GCorr Model." Moody's Analytics Whitepaper, 2012.

Kaplin, Andrew, Amnon Levy, Nihil Patel, and Libor Pospisil "Applications of GCorr™ Macro: Risk Integration, Stress Testing, and Reverse Stress Testing." Moody's Analytics Whitepaper, 2014.

Kaplin, Andrew, Amnon Levy, Qiang Meng, and Libor Pospisil "Quantifying Risk Appetite in Limit Setting." Moody's Analytics Whitepaper, 2015.

Levy, Amnon, "An Overview of Modeling Credit Portfolios." Moody's Analytics Whitepaper, 2013.

Levy, Amnon, "Nonbank players are ready for CECL — are banks?" American Banker, August 15, 2019.

Levy, Amnon and Jing Zhang, "Measuring and Managing the Impact of IFRS 9 and CECL Requirements on Dynamics in Allowance, Earnings, and Bank Capital." Moody's Analytics Whitepaper, 2018.

Levy, Amnon, Xuan Liang, and Pierre Xu, "Earnings Volatility, Share Price Performance, and Credit Portfolio Management Under CECL and IFRS 9." Moody's Analytics Whitepaper, 2019.

© 2021 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ISSUED BY MOODY'S INVESTORS SERVICE, INC. AND ITS RATINGS AFFILIATES ("MIS") ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND CREDIT RATINGS AND RESEARCH PUBLICATIONS PUBLISHED BY MOODY'S ("MOODY'S PUBLICATIONS") MAY INCLUDE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL, FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS AND MOODY'S OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S PUBLICATIONS MAY ALSO INCLUDE QUANTITATIVE MODEL-BASED ESTIMATES OF CREDIT RISK AND RELATED OPINIONS OR COMMENTARY PUBLISHED BY MOODY'S ANALYTICS, INC. CREDIT RATINGS AND MOODY'S PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS AND PUBLISHES MOODY'S PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTORWILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

MOODY'S CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT INTENDED FOR USE BY RETAIL INVESTORS AND IT WOULD BE RECKLESS AND INAPPROPRIATE FOR RETAIL INVESTORS TO USE MOODY'S CREDIT RATINGS OR MOODY'S PUBLICATIONS WHEN MAKING AN INVESTMENT DECISION. IF IN DOUBT YOU SHOULD CONTACT YOUR FINANCIAL OR OTHER PROFESSIONAL ADVISER.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT.

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the rating process or in preparing the Moody's Publications.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability to any person or entity for any indirect, special, consequential, or incidental losses or damages whatsoever arising from or in connection with the information contained herein or the use of or inability to use any such information, even if MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers is advised in advance of the possibility of such losses or damages, including but not limited to: (a) any loss of present or prospective profits or (b) any loss or damage arising where the relevant financial instrument is not the subject of a particular credit rating assigned by MOODY'S.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability for any direct or compensatory losses or damages caused to any person or entity, including but not limited to by any negligence (but excluding fraud, willful misconduct or any other type of liability that, for the avoidance of doubt, by law cannot be excluded) on the part of, or any contingency within or beyond the control of, MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers, arising from or in connection with the information contained herein or the use of or inability to use any such information.

NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

Moody's Investors Service, Inc., a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by Moody's Investors Service, Inc. have, prior to assignment of any rating, agreed to pay to Moody's Investors Service, Inc. for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at www.moodys.com under the heading "Investor Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

Additional terms for Australia only: Any publication into Australia of this document is pursuant to the Australian Financial Services License of MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657AFSL 336969 and/or Moody's Analytics Australia Pty Ltd ABN 94 105 136 972 AFSL 383569 (as applicable). This document is intended to be provided only to "wholesale clients" within the meaning of section 761G of the Corporations Act 2001. By continuing to access this document from within Australia, you represent to MOODY'S that you are, or are accessing the document as a representative of, a "wholesale client" and that neither you nor the entity you represent will directly or indirectly disseminate this document or its contents to "retail clients" within the meaning of section 761G of the Corporations Act 2001. MOODY'S credit rating is an opinion as to the creditworthiness of a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail investors. It would be reckless and inappropriate for retail investors to use MOODY'S credit ratings or publications when making an investment decision. If in doubt you should contact your financial or other professional adviser.

Additional terms for Japan only: Moody's Japan K.K. ("MJKK") is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly-owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MZO. Moody's OVERSEAS Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MJKK. MSFJ is not a Nationally Recognized Statistical Rating Organization ("NRSRO"). Therefore, credit ratings assigned by MSFJ are Non-NRSRO Credit Ratings. Non-NRSRO Credit Ratings are assigned by an entity that is not a NRSRO and, consequently, the rated obligation will not qualify for certain types of treatment under U.S. laws. MJKK and MSFJ are credit rating agencies registered with the Japan Financial Services Agency and their registration numbers are FSA Commissioner (Ratings) No. 2 and 3 respectively.

MJKK or MSFJ (as applicable) hereby disclose that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MJKK or MSFJ (as applicable) have, prior to assignment of any rating, agreed to pay to MJKK or MSFJ (as applicable) for appraisal and rating services rendered by it fees ranging from JPY200,000 to approximately JPY350,000,000.

MJKK and MSFJ also maintain policies and procedures to address Japanese regulatory requirements.