

Delivering Integrated COREP and FINREP Reporting

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The Professional Risk Managers'
International Association



Agenda

COREP & FINREP: An Overview

Robert Driver, Policy Advisor, The British Bankers Association

The Challenges of Delivering Fully Integrated COREP & FINREP Reports

A Best-practice Framework for Delivering Integrated COREP & FINREP Reports

Eric Leman, Associate Director, Solution Specialist, Moody's Analytics





COREP and FINREP: An Overview

Robert Driver

British Bankers' Association



British Bankers' Association

- We represent 200 banks from 50 countries
- Which have operations in 180+ countries
- 50 professional services members
- UK, EU and globally focused
- 65 staff



FINREP (Financial Reporting)

Objective

Comprehensive view of the risk profile", "a view on the systemic risks posed by institutions" (art 95 CRR)

Templates

- Standardisation of IFRS disclosure
- •"FINREP" templates
- •Reported on a quarterly, semi annual, or annual basis



FINREP

Challenges

- Practical implementation issues
- •Differences in FINREP and annual account methodology
- Data gaps
- Consistency



COREP (Common Reporting)

Templates

- •Own funds: Capital adequacy, group solvency, credit risk, market risk, operational risk
- Liquidity
- Leverage ratio
- •IP losses



COREP

Challenges

- Consistency of implementation
- Availability and quality of data
- Timelines
- •3rd party solutions
- XBRL and validations
- Alignment to other regulatory requirements



Delivering Integrated COREP and FINREP Reporting

Eric Leman, Associate Director, Solution Specialist Moody's Analytics

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- 1. The Challenges of Delivering Fully Integrated COREP & FINREP Reports
- 2. A Best-practice Framework for Delivering Integrated COREP & FINREP Reports





Increased Regulatory Reporting Demands & Challenges

» EUROPE

- Basel III LCR & NSFR reports on liquidity risk, plus monitoring reports
- COREP Basel III capital and leverage ratio reports
- FINREP financial reports
- Large Exposures
- Forbearance and non performing loans reports
- Unencumbered assets reports

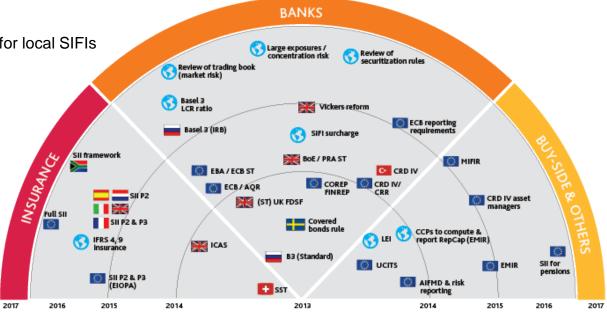
» UK

Actual and Forecast FDSF reports for local SIFIs

Bank Of England reports

» USA

- Update FFIEC101, 102 for Basel III Advanced reports
- Update US call reports for Basel III Standardized
- FRY-14 CCAR monthly, quarterly and annual
- FRY-16 DFAST reports for smaller institutions
- FRY-15 systemic reports for G-SIBs
- FR2320 liquidity risk reports







Increased Regulatory Reporting Demands & Challenges

- » More and more regulations and regulatory reports to file with regulators
- » Enhanced scrutiny on consistent reporting (reconciliation when the same information is reported differently)
- » Increased granularity of reports
- » Increased reporting frequency
- » Increased transparency of Pillar 3 disclosure requirements



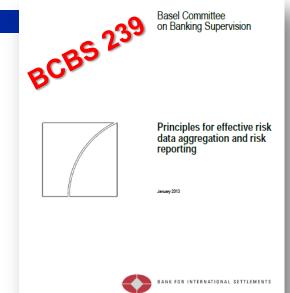
New Regulation and Regulatory Reporting Challenges

- » Collectively, Basel III and stress testing are forcing banks to invest heavily in risk management infrastructure and software. These new regulatory requirements have redefined the quantity and quality of capital and have imposed new stress testing reporting requirements that are straining existing systems and personnel to the limit.
- To effectively manage the balance sheet and comply with stricter regulatory requirements, financial institutions must select the risk technology infrastructure and risk management tools that are appropriate for the institution's size, complexity and risk management objectives.
- To remain competitive, banks must keep up with the latest developments in risk measurement and management.
- Ultimately, firms that tie risk exposures to capital more effectively will be better able to integrate risk-taking decisions into their strategic and tactical decision-making.
- » Convergence between risk and finance is also one of the key challenges that institutions have to face to answer increasingly stringent regulatory reporting demands from regulators.



Data Consolidation Challenge

» For many banks, the greatest challenge in developing a COREP & FINREP reporting infrastructure is understanding how to integrate a broad array of datasets into a single, coherent dataset, in a central repository.



Accuracy	» Accurate and consistent data management is core to integrated COREP and FINREP reporting, as well as broader Basel III regulatory compliance					
Diversity	 The datasets that are used to calculate and populate COREP and FINREP reports are stored: across a wide array of different source systems in multiple formats with differing standards of data quality 					
	» The dataset must include fully reconcile transaction level risk and finance					

data so it can deliver fully reconciled COREP and FINREP reports.



Reconciliation

Cleansing and Auditing the Data



Quality

- » A consolidated dataset is only as good as the quality of its data
 - It is essential that all data is validated as it is imported into the central repository, to ensure that there are no errors, no missing data and that the quality of the data, such as its age, meets banks overall COREP and FINREP reporting requirements.
 - This process should be repeated during the calculation and reporting stage as well.

Automation

- The large number of sources that COREP and FINREP reports draw upon demand an automated approach to highlight any data quality issues:
 - Easily highlight issues
 - Fix them quickly

Auditability

- The ability to audit these changes is central to maintaining the bank's data integrity standards. To maintain data integrity, auditors, security staff and regulators must be able to identify and manage changes applied
 - when a single cell is altered
 - when a comprehensive data patch is applied



Consistent Calculation Process

Same Sources

- » COREP and FINREP reports cover different areas. However they must share the same data source to ensure that banks report their risk and finance results with consistency
- » Therefore, calculation engines should use this data foundation to produce COREP and FINREP results.

Volumes

These engines need to be powerful to handle huge volumes of calculations based on the vast range of transactions they handle.

Flexibility

These engines need to be flexible to fully capture supervisors formulas and to maintain them as regulations evolve.



Consistent Calculation Process

Broader Scope

- These same engines should also calculate other Basel Pillar 1 and Pillar 3 reports, leveraging the same data and the appropriate formulas for these results.
 - This ensures that the results are fully consistent across the broad range of reports that a bank must submit.
 - Leverage Ratio, Liquidity Ratio, Large Exposures calculations
- Other local regulatory reports should use the same results.

Stress Testing

- » An additional complexity is that regulators in the US and EU are enhancing their stress testing regimes
- This can involve financial institutions providing more granular reports.
 - For example in the UK, the Prudential Regulatory Authority's (PRA) Firm Data Submission Framework (FDSF) requires this level of detail.



Complex Reporting Requirements

Solo and Consolidated

- » In line with Pillar 1 reports, COREP and FINREP reports have consolidated and solo reporting requirements.
 - EU-headquartered banks need to report their group COREP results to their primary regulator, and individual country COREP results to the relevant regulators.
 - FINREP reports are typically submitted on a consolidated basis, except where a solo entity issues its own securities.

Alignment

- » In parallel to this, COREP and FINREP reports must be consistent and aligned with other regulatory reports banks submit to their supervisors and stakeholders:
 - Annual Reports to Shareholders
 - Local Regulatory Reports



Complex Reporting Requirements

National Specificities

- » An additional complexity is that the EBA mandates the collection of a core set of FINREP reports, while allowing national discretion over the collection of non-core reports, which varies from country to country
- » For instance, some banking groups may produce IFRS FINREP where some of their subsidiaries produce Local GAAP FINREP

Various Formats

- » Furthermore, each national regulator has wide latitude over how they draw up their COREP and FINREP templates. While the core taxonomy will remain consistent there will be variation in how these results are submitted:
 - the titles used in the returns may vary to accommodate languages issues,
 - the sign off and feedback procedures may be different per country.
- The templates must support the XBRL models, as well as other electronic formats (Microsoft Excel®, XML, ASCII, Online) as required by each of the local regulators.



While the advent of COREP and FINREP reporting present significant challenges for institutions, there are a set of best practice principles that ensure that a bank can comply fully, cost effectively and on-time.



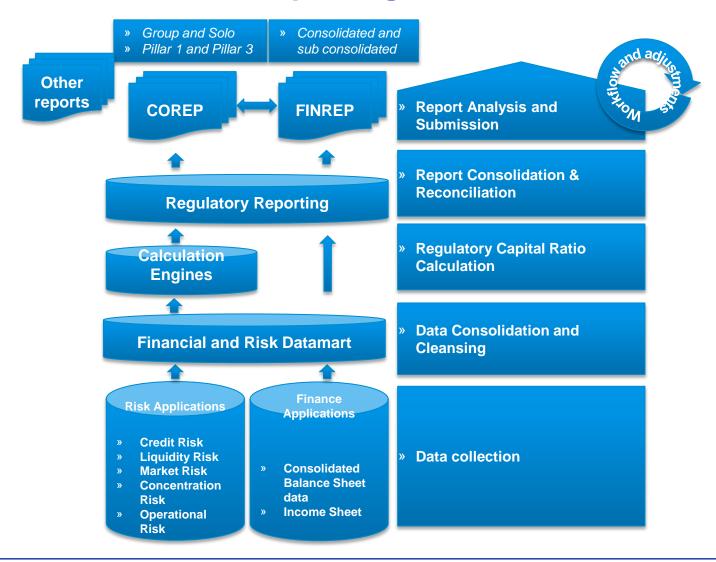
Agenda

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COREP and FINREP Reporting Framework





Leverage An Open Model



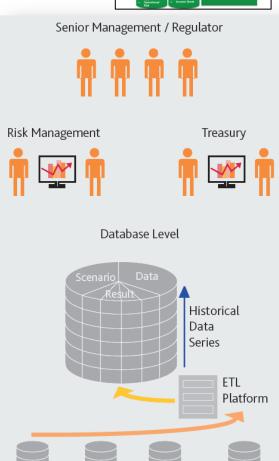
Openness

The data needed to populate COREP and FINREP reports will come from a wide range of source systems.

The solution needs to be open and flexible so that any data type can be pulled from any system with a minimum of systems integration effort, to reduce time and cost.

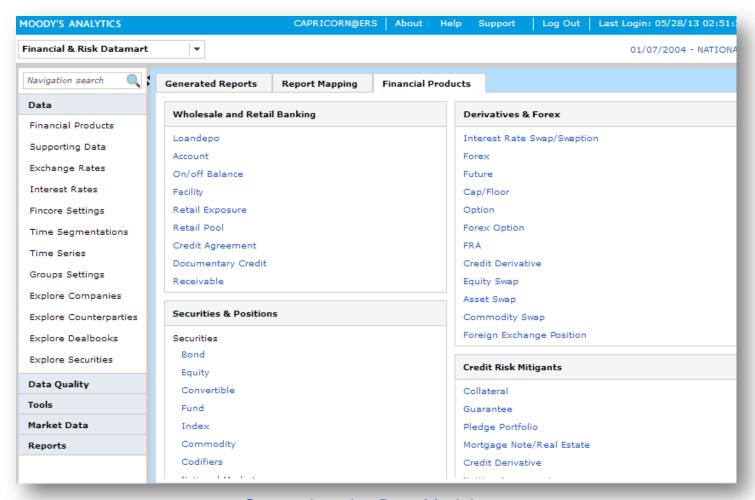
Modularity

- » Moreover, the solution should be flexible enough to accommodate a modular approach to data management, calculation and reporting.
 - Banks should be able to leverage their existing investment in technology, and add modules as needed to create the optimal solution to meet their needs.
 - In a changing regulatory and business environment, flexibility should be at a premium.





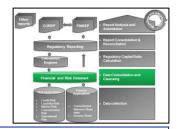
Risk Platform: Integrated Risk and Finance Data



Comprehensive Data Model



Deploy a Centralized Data Platform



Unsiloed

» For COREP, FINREP, National Regulatory Reports, Pillar 3 Reports and Stress Testing, having the data needed to calculate the results spread across multiple silos is no longer realistic.

Data Quality

» A centralized data platform allows for the data to be cleansed, validated and patched if necessary, ensuring that the final calculations and reports are accurate and consistent

Reconciliation

» Importing balance sheet information into the data platform ensures that the risk and finance data is fully reconciled at the transaction level. This provides a platform for fully integrated and reconciled COREP and FINREP reports.

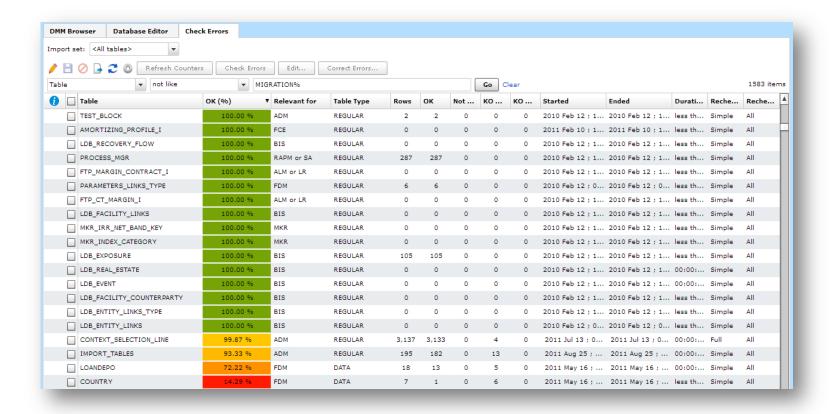
ERM

This type of centralized data approach can be leveraged further to encompass liquidity risk management, economic capital management and stress testing, to provide an end-to-end to enterprise risk management platform for a bank.



Quickly Identify and Fix Data Errors

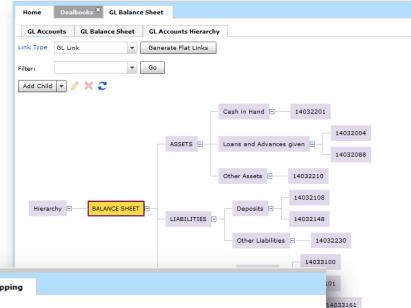
- » More than 3,000 data quality checks built-in
- » Capacity to edit data with audit trail

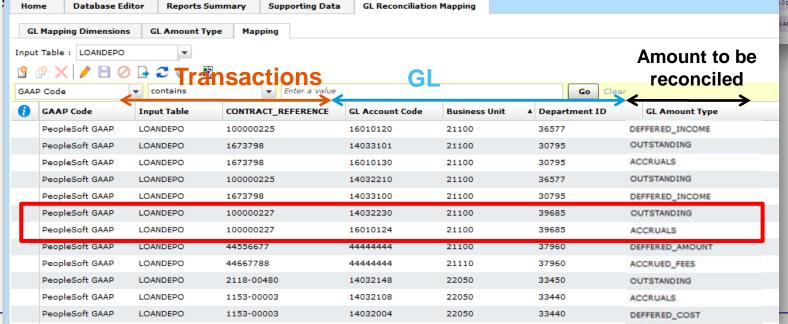




General Ledger Reconciliation

- » Model the GL structure
- » Mapping transaction to GL Accounts
- » Check the results and find discrepancies







Use Automated Calculations



Automation

- The scale and scope of COREP and FINREP reports (now with over 35,000 data points), alongside other Basel III calculations, means that manual, or even semi-automated calculations that banks might have used in the past are no longer feasible.
- » Highly automated processes, leveraging built-in calculation formulas, should be used as widely as possible to meet the demands of accurate, consistent, auditable and timely results.

Maintenance

- The enhanced scale and scope of COREP and FINREP reporting means that maintaining the calculation formulas might best be outsourced to a third-party, to maintain accuracy.
- » Maintaining the currency of formulas is a significant overhead for banks that can prove exceptionally costly if errors and oversights find their way into the calculation process.



Built-in Basel I, II & III Rules Per Regulator

- » Out-of-the-box regulatory parameters
- » Fully auditable

Supervisor/Regulation:

Configuration Version:

Credit Risk

▶ Regulatory Data
▶ Mapping

▶ EAD Rules

▶ RW Rules

▶ Rating and PD

Limit Types

▶ Counterparty Rules

▶ CRM - Calculation Approaches

► CRM - Eligibility and Haircuts

► CRM - Guarantee Double Defau

CRM - Diversification Treatment

Reclassification Rules and Filter

» Regulatory Maintenance

Regulatory Calculation

Liquidity Risk

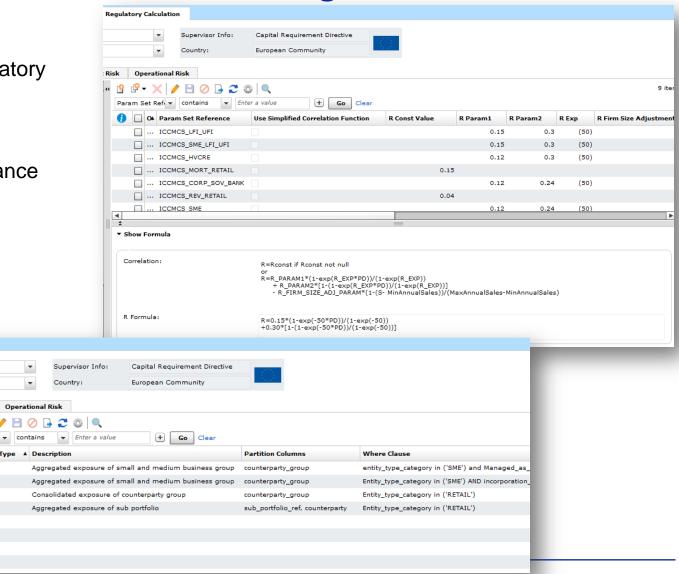
CRD Basel 3

Market Risk

DOA

EU

UPS





Automate COREP & FINREP Reporting



End-to-end process

» Alongside the automated data consolidation and the calculation of the results, the solution should also seamlessly integrate regulatory reporting, to create a comprehensive, automated and consistent end-to-end process.

Maintenance

Automatically populating the reports, by leveraging built-in reporting templates, overcomes the significant challenges of reporting COREP and FINREP results. This approach also allows the straightforward updating of reports, as regulators' requirements develop.

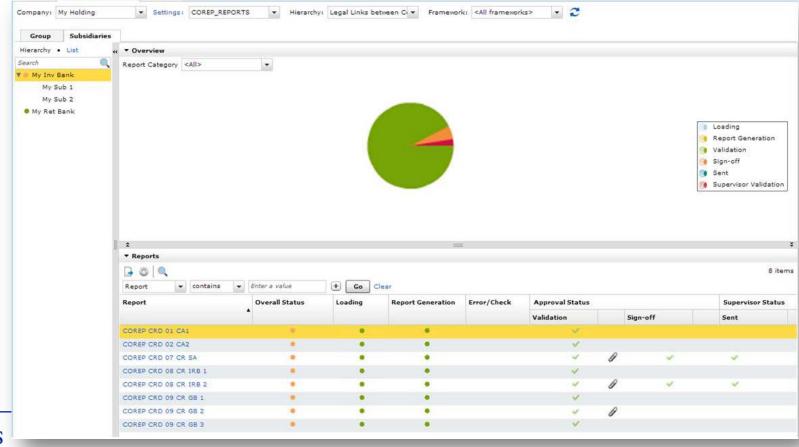
Perimeter

These templates should cover all the various COREP and FINREP reports that national regulators require, covering both core and non-core reports, on both a group and solo basis.



Group and Solo Entity Monitoring

- Manage inter-company deals
- » Monitor Reports production for the group





Automate COREP & FINREP Reporting



Broader Scope

- The reporting solution must also be able to manage all other regulatory reports to ensure consistent results:
 - Basel III Pillar 1 and 3 Reports
 - Stress Testing Reports
 - National Reports
 - Internal Business Reports
- » Leveraging templates across all reports can enable banks to provide an accurate and consistent picture to all of their regulators, in the most effective way.

Better Decision Making

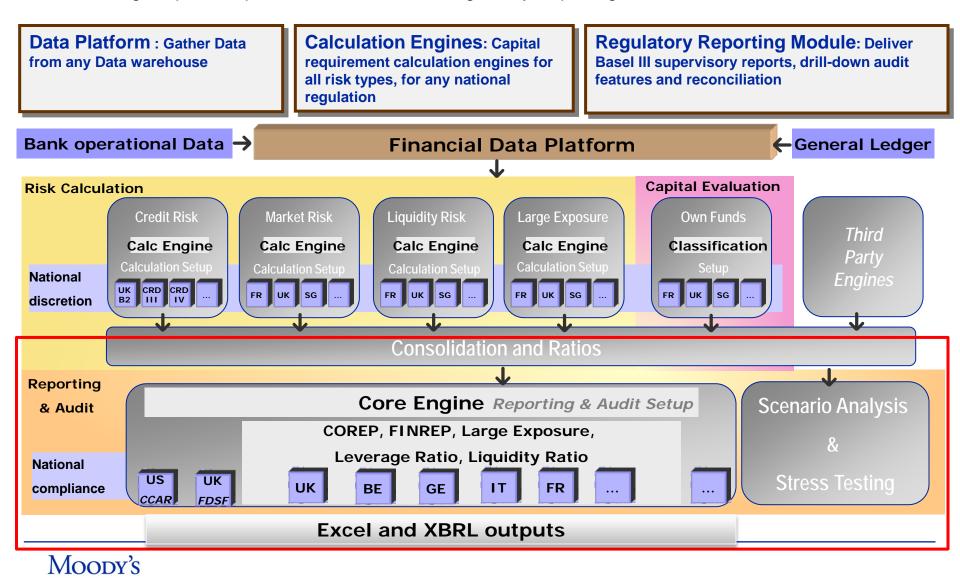
This approach can provide a bank's management with a single, fully integrated, fully reconciled perspective of its risk and finance position. It can enable managers to make fully informed risk and finance strategic business decisions.



Regulatory Compliance Best Practices

ANALYTICS

Data Modeling, Capital Requirement Calculation & Regulatory Reporting



Utilize Drill-Down and Validation Capabilities



Auditability

- The optimal solution also needs to have drill-down capabilities, allowing managers to drill-down into the results to gain insight into the reports and the business.
- This capability allows banks to respond quickly to enquiries from regulators about their results, reducing the compliance overhead.

Understanding The Business

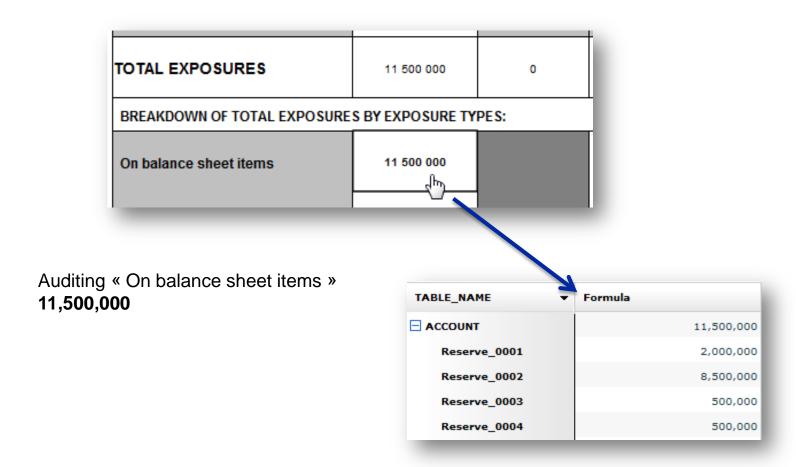
» It also allows managers to quickly and easily drill-down into the risk and finance details of the business, enhancing their insight into the business and helping them to generate strategic options for the business.

Validity Check

- » Validation rules should also ensure the consistency intra- and inter-reports.
 - EBA provides consistency rules for COREP and FINREP
 - Banks should also be able to create their own validity checks

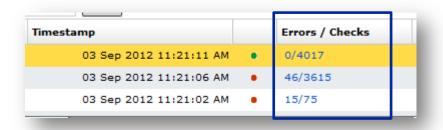


Drill-Down into the Granularity

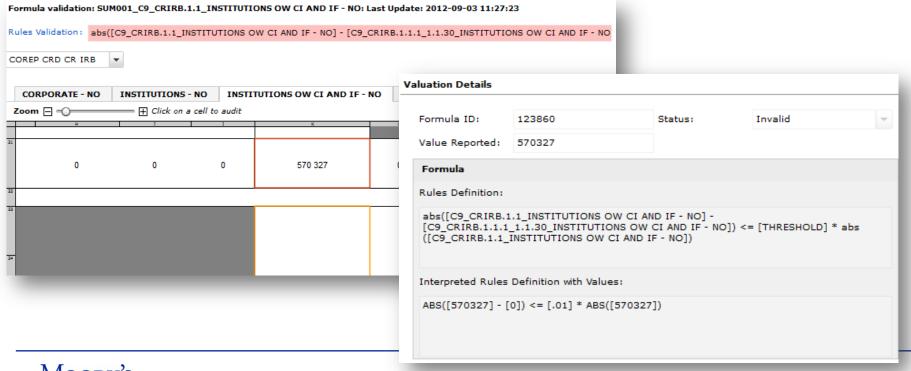




Users Perform Quality Checks – Validation



- » Supervisor Validity Checks are delivered out-of-the-box.
- » Custom validity checks can be implemented





Comprehensive Change Workflow



Adjustments

- Consolidating data, calculating results and submitting COREP and FINREP reports is highly complex, often requiring changes and amendments as issues and errors are identified and fixed.
- The amendment process needs to be carefully controlled, so that a bank's management can be assured that what they formally submit is a true reflection of its position.

Workflow

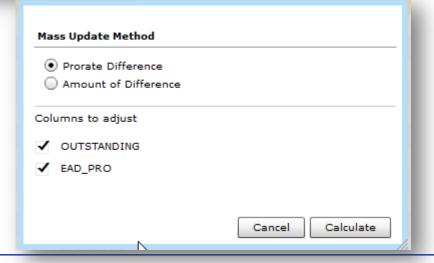
- Central to this is having an automated change approval process that both controls and records who can make and approve changes.
- » Automation ensures speed and accuracy, and can be leveraged to provide management control and audit capabilities to highlight what changes were made and on whose approval.
- » This audit capability is now a requirement for many regulators.



Error Detection & Correction

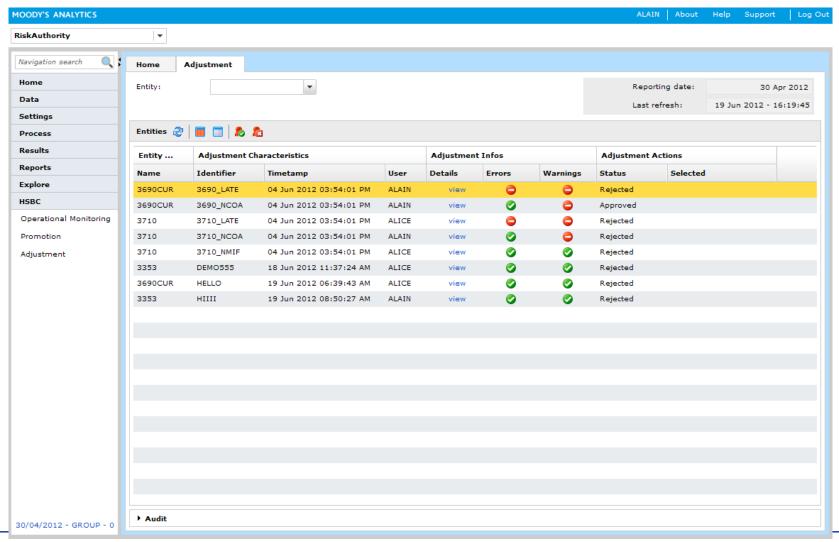
Booking Company	Contract Reference	P.	. Outstanding		EAD pro		EAD	
			Initial	Adjusted	Initial	Adjusted	Initial	Recalculated
My Inv Bank	DEAL_IMPORT_SWAP_MS_02		0	0	0	0	252618.3	252618.3057
My Inv Bank	SG7J27931939		100000	200000-	0	0	88000	8
My Inv Bank	IR_Swap_0002		15803310	15803310	0	0	236218.7	236218.7100
My Inv Bank	OPTIONS_0003		-8568646	-8568646.5	0	0	0	
My Inv Bank	IR_Swap_0001		63213242	63213242	0	0	2949951	2949951.314
My Holding	HK0000061173		21071080	21071080	0	0	21071080	21071080.81
My Holding	FRA_0002		19474196	194741966	0	0	0	
My Holding	Loan_FI_0014		11500000	11500000	0	0	11500000	1150
My Holding	Loan_FI_0013		116000000	116000000	0	0	116000000	11600
My Holding	Loan_FI_0012		3000000	3000000	0	0	3000000	300

- » Adjustments may be completed manually or by Mass Update
- » Other metrics are recalculated on a prorata basis





Approval/Submission Workflow





Moody's ANALYTICS

Q&A

Thank You

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