

Leading Research

Paul Hyde
Thorsten Liebert
Philipp Wackerbeck

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A Comprehensive Risk Appetite Framework for Banks



What is risk appetite and why does it matter now?

Definition and Objective of Risk Appetite

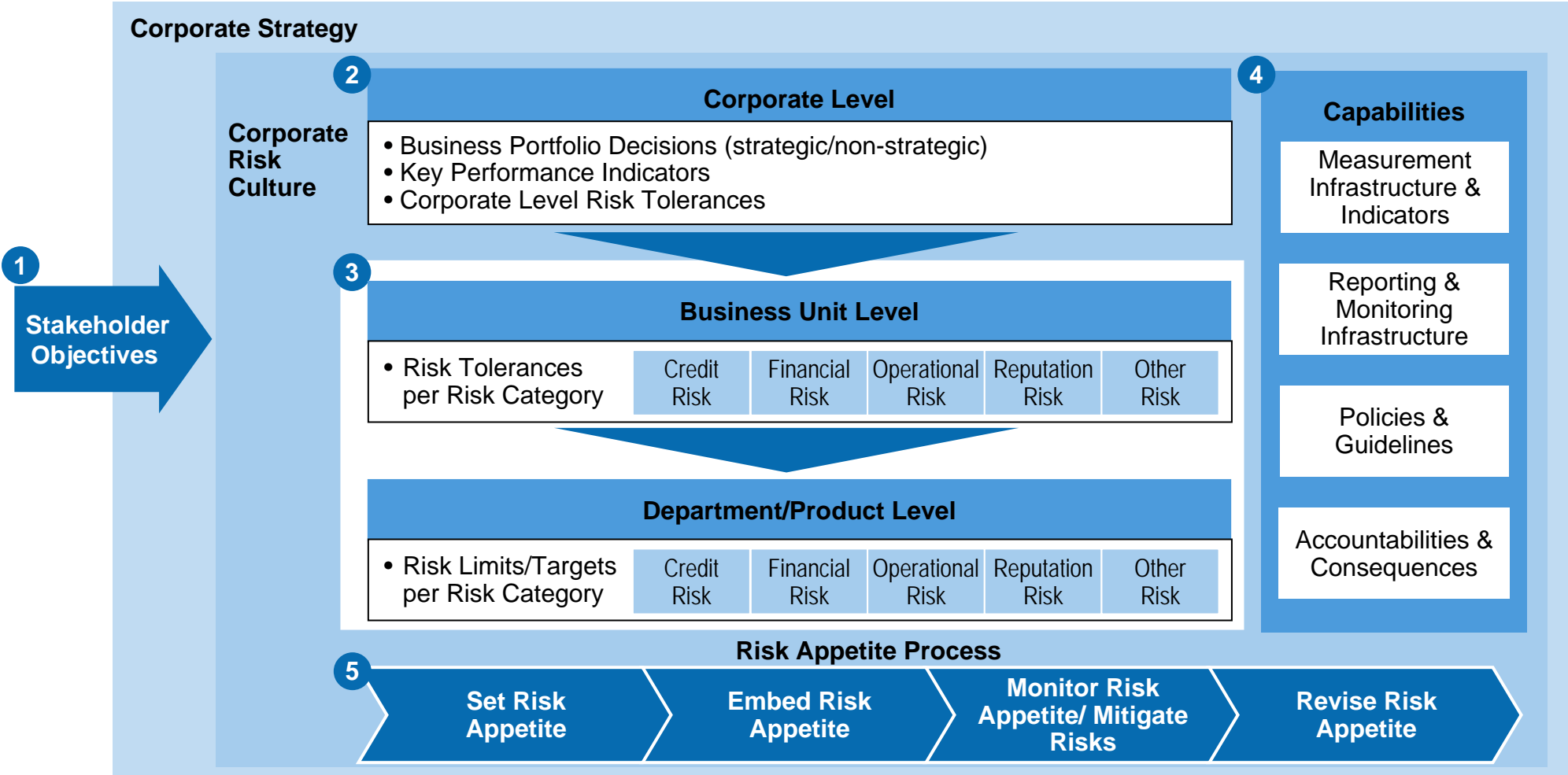
The global financial crisis has demonstrated clearly that many banks lacked a proper understanding of their true risk profile and realized too late that it was not in line with their desired risk profile. This forced senior management to explain losses that were a multiple of what shareholders had expected to face. The key lesson learned from this crisis is that financial institutions need to have a comprehensive risk appetite framework in place that helps them better understand and manage their risks by translating risk metrics and methods into strategic decisions, reporting, and day-to-day business decisions.

Risk appetite is considerably more than a sophisticated key performance indicator (KPI) system for risk management. It's the core instrument for better aligning overall corporate strategy, capital allocation, and risk. Regulators, rating agencies, and professional investors are aggressively pushing banks to advance their risk management practices. A comprehensive risk appetite framework is the cornerstone of a new risk management architecture.

A comprehensive risk appetite framework is embedded in the corporate strategy and risk culture of the bank

Five Elements of a Risk Appetite Framework

CONCEPTUAL



Regulators and rating agencies now require banks to align various stakeholder objectives to better balance strategy, capital, and risk

Conversion of Stakeholder Objectives into KPIs



High-level KPIs are defined and operationalized, with risk appetite and tolerances established for each

Key Performance Indicators

ILLUSTRATIVE

- Once a core set of KPIs are defined in alignment with stakeholder objectives, those KPIs must be translated into measurable categories. For example, capital adequacy can be measured by looking at these three ratios:
 - Tier 1 Common Capital/Risk-Weighted Assets
 - Tier 1 Total/ Risk Weighted Assets
 - Tier 1 Total/ Economic Capital
- Next, risk appetite levels need to be set, and risk tolerances established, for the core KPIs.
- Senior management and the board need to review and approve both risk appetite and tolerances for selected KPIs.

Risk Level	Low	Medium		High	Actual	
	1	2	3	4		5
Potential KPIs						
Capital Adequacy (e.g., Tier 1 capital/ economic capital)						
Earnings Volatility (e.g., % Earnings at Risk per annum)						
Shareholder Value (e.g., RAROC or EPA)						
Creditworthiness (e.g., S&P long-term debt rating)						
Regulatory Standing (e.g., Camel)						
Reputation (e.g., Reputation index)						

Existing risk profile
 Desired risk appetite
 Risk tolerance range
 Within tolerance
 Slightly out of tolerance
 Out of tolerance

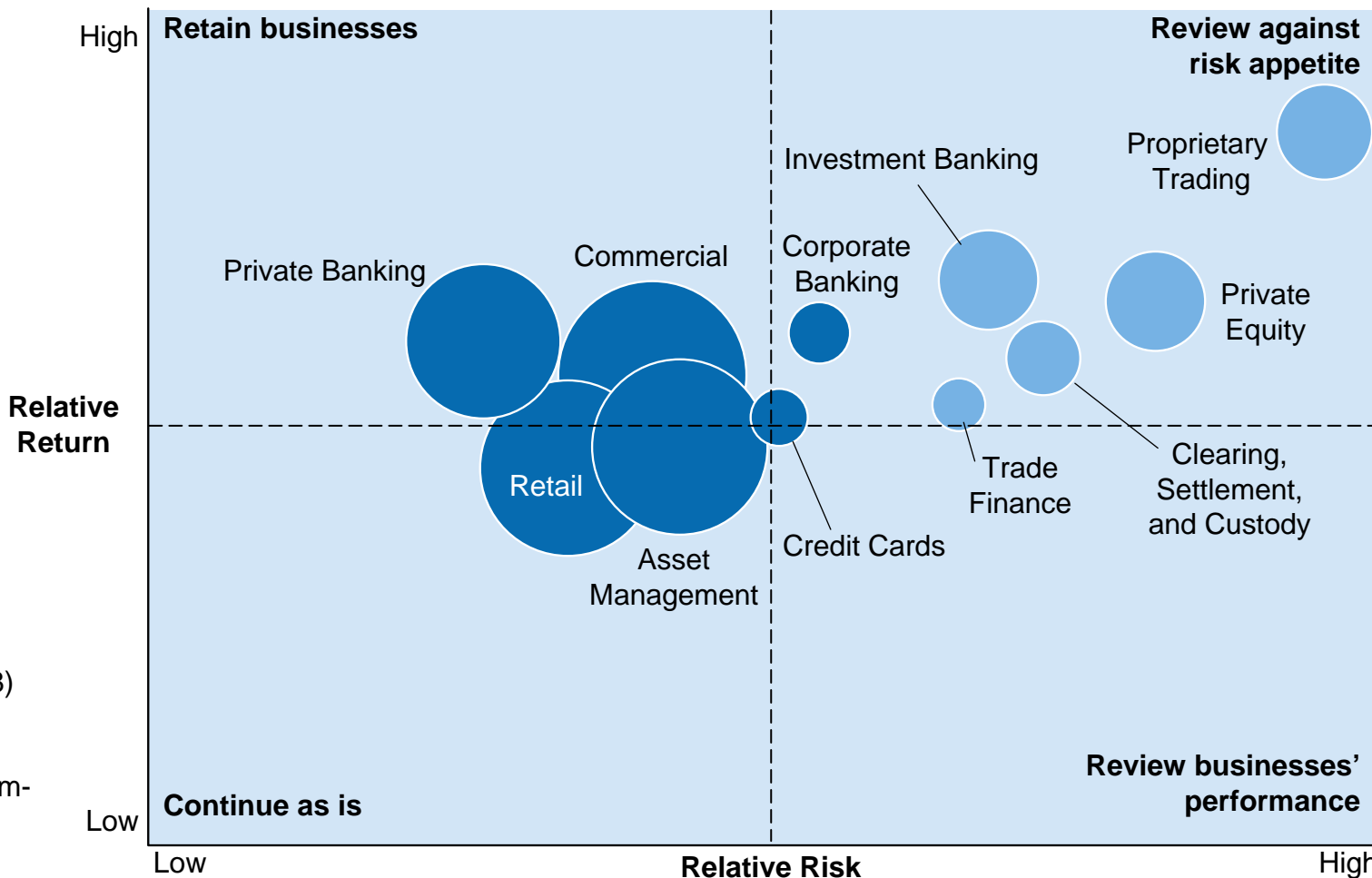
The desired risk appetite helps facilitate business portfolio decisions based on a comparison of risk-return profiles

Business Portfolio Decisions

ILLUSTRATIVE

For each business ask:

- Are there clear intentions (continue, review, or divest)?
- Should it be grown, contracted, or maintained?
- Should its risk be increased, decreased, or maintained?
- Should controls be increased, decreased, or maintained?



Notes:

- 1) Size of the bubble indicates net profit (2008) of business unit
- 2) Lighter blue in bubble shading indicates medium-high risk or high-risk businesses

For specific risk management purposes, risk appetite and tolerances are defined for all major risk categories

ILLUSTRATIVE

Corporate-Level Risk Appetite and Tolerances

- Risk appetite is usually expressed in risk measures (e.g., value at risk), nominal measures (e.g., \$ amount of credit outstanding), or outcomes (e.g., capital level).
- Efforts to manage risk appetite and risk tolerance will necessarily focus on those risk categories that have the highest percentage of total economic capital allocated to them.
- Aggregation of risk tolerances ensures that the bank operates in line with its desired overall risk appetite.

Risk Categories	Risk Appetite		Low		Medium		High	Economic Capital Allocated (in % of Total EC)	Actual
	1	2	3	4	5				
Credit Risk		█						60%	○
Financial Risk - Market Risk - Interest Rate Risk - Liquidity Risk - Counterparty Risk			█					25%	○
Operational Risk - Operational Risk - Compliance Risk - Corporate Security Risk - Technology Risk			█					10%	◐
Reputation Risk		█						1%	○
Other Risks - Strategic Risk - Legal Risk			█					4%	●

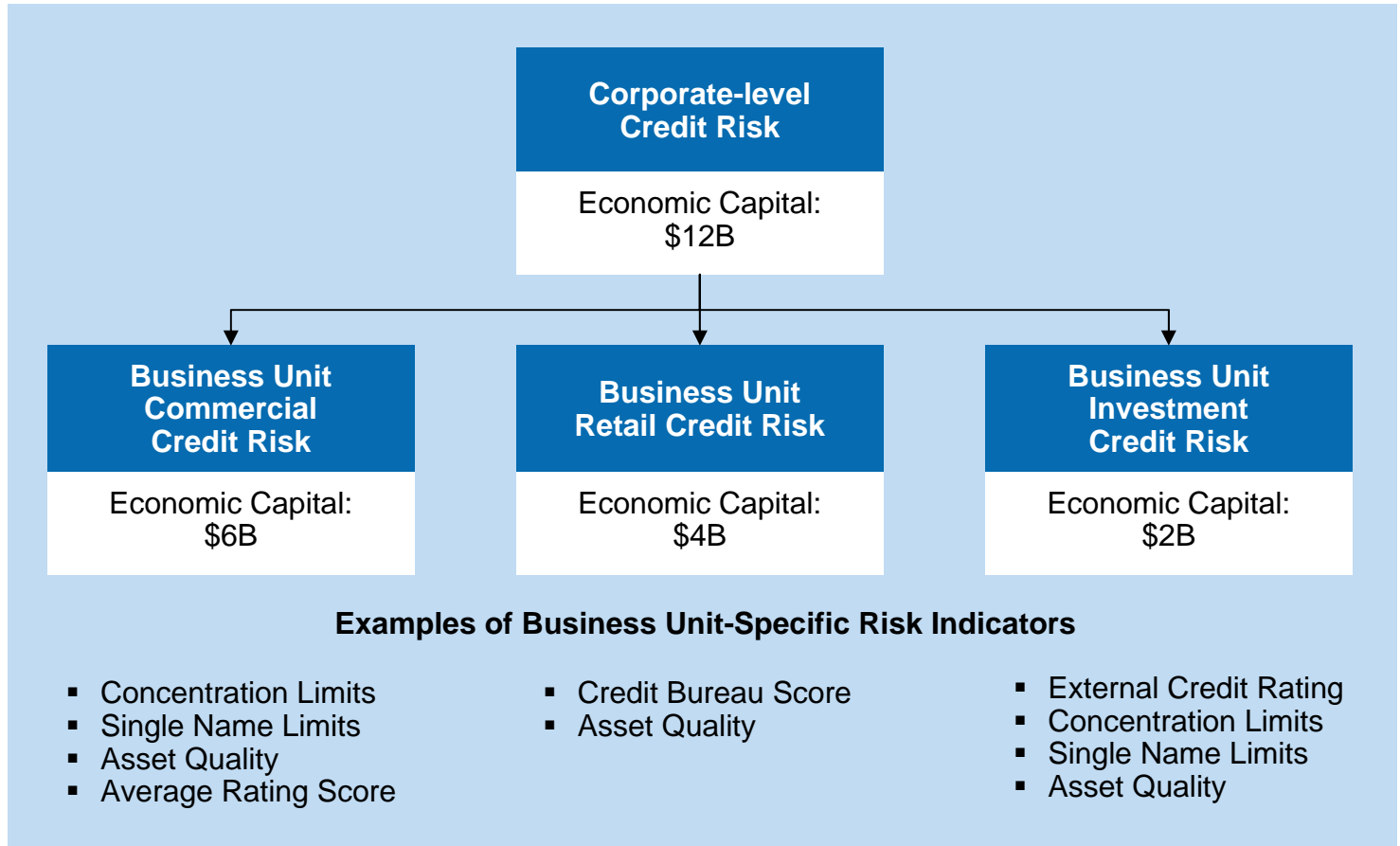
Existing risk profile
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Corporate-level risk appetite and tolerances are drilled down to business units with limits and targets for departments and products

Drill-down of Risk Appetite and Tolerances

CREDIT RISK EXAMPLE

- This example illustrates the tradeoffs between capital, strategy, and risk. To meet the growth targets of their respective strategic plans, each business unit must pitch Corporate for additional economic capital, incorporating a risk-based view.
- Targets are set on the basis of desired risk/return profile and management's capacity to manage each risk.
- Limits help translate appetite and tolerances into practical constraints on business activity.



Specific capabilities are required to successfully implement and manage a risk appetite framework

Capability Requirements

Measurement Infrastructure & Indicators

- At the corporate level, develop a comprehensive set of KPIs and high-level tolerances for all risk categories.
- At the business unit and product level, develop risk tolerances for all relevant risk categories.
- Ensure that all data for defined KPIs is readily available as needed.

Reporting & Monitoring Infrastructure

- Develop a high-level corporate risk appetite and tolerances dashboard for senior management and board as well as individual dashboards for major business units with detailed appendices, covering all relevant risk categories.
- Define monitoring responsibilities and frequencies within business units and the risk management function.

Policies & Guidelines

- Risk appetite and tolerance adherence needs to be consistently embedded in all risk-related policies and guidelines.
- Ensure that risk appetite statement is aligned with overall corporate risk philosophy and culture.

Accountabilities & Consequences

- Define clear responsibility for setting, approving, and reviewing risk appetite and tolerances.
- Establish and communicate escalation mechanisms and consequences for breaches of limits and tolerances.
- Put in place good communication, understanding, and agreement across all organizational levels.

Once the risk appetite is set, it needs to be embedded, and then continuously monitored and revised

Ongoing Risk Appetite Process



Key activities

- Set desired risk appetite by considering:
 - Business strategy
 - Economic conditions
- Ensure alignment with business strategy.
- Obtain board signoff of risk appetite statement.
- Cascade the risk appetite down through the bank:
 - At the portfolio level
 - At the BU level within portfolios (e.g., for retail, corporate, investment banking)
- Align compensation and culture with risk appetite.
- Embed governance.
- Regularly monitor as-is risk profile against the risk appetite.
- Support monitoring with:
 - Relevant infrastructure
 - Appropriate processes
- Mitigate unwanted risks.
- Review risk appetite in light of:
 - Changing business and economic conditions
 - Evolving group- and portfolio-level strategic priorities
 - Changing competitive conditions

Output

- Clearly defined risk appetite statement containing both qualitative and quantitative elements.
- Risk appetite that is defined at the most granular level possible while still remaining actionable.
- Clear understanding of the risk appetite by all executives:
 - At the portfolio level
 - At the BU level within portfolios
- Buy-in from executives to run their businesses in line with the risk appetite.
- Risk profile reports containing:
 - Assessment of risk profile against risk appetite
 - Mitigating actions to align risk profile with risk appetite
 - Other key findings
- Revised risk appetite statement.

For more information, please contact:

Cleveland

Philipp Wackerbeck, PhD

Senior Associate

+1-216-905-6605

philipp.wackerbeck@booz.com

London

Thorsten Liebert

Principal

+44-207-393-3272

thorsten.liebert@booz.com

New York

Paul Hyde

Partner

+1-212-551-6069

paul.hyde@booz.com

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