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Executive General Manager Business Development & Risk Management Premium Business Services

Commonwealth Bank of Australia ACN 123 123 124

### **CBA Risk Management Briefing**

8 December 2006

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# **Agenda**

- Introduction Mick Leonard
- Economic Update Michael Blythe
- Overview Mick Leonard
- Insurance Risk Jim Evans
- Retail Credit Risk David Grafton
- Market Risk Paul Riordan
- Panel Questions



Michael Blythe
Chief Economist

### **Other Key Information**

### **Notes**

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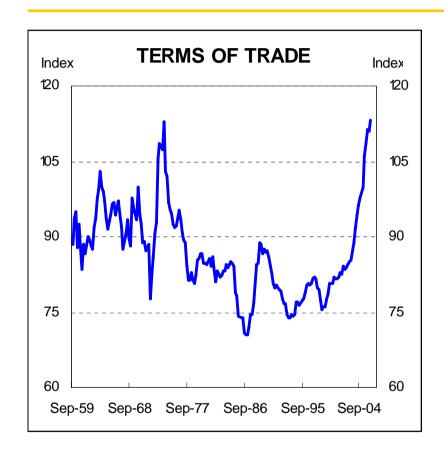
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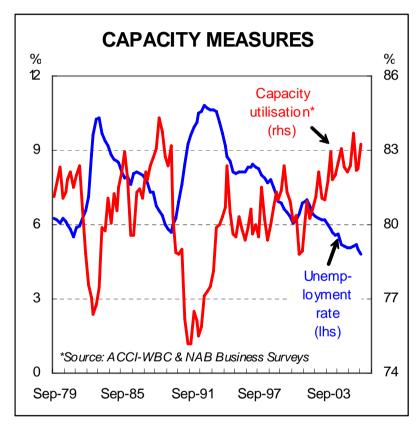
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**Cormonwealth**Bank



# **Key Drivers:** Strong Income & Spending





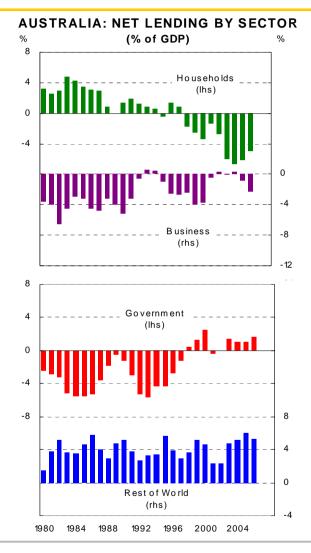
- Rising terms of trade are providing a substantial income boost.
- Lengthy period of uninterrupted growth means little slack in the economy.

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# **Key Outcomes**

### **Squaring the circle**

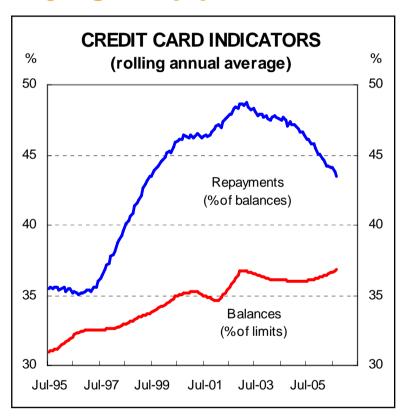
- From a savings-investment perspective, the terms of trade boom encouraged global investors to lend us more and allowed government to become a net lender as well.
- The flip side is that businesses and, especially, households were encouraged to increase their borrowings.
- Implications:
  - leveraged to the global economy like never before;
  - the household sector is most exposed.

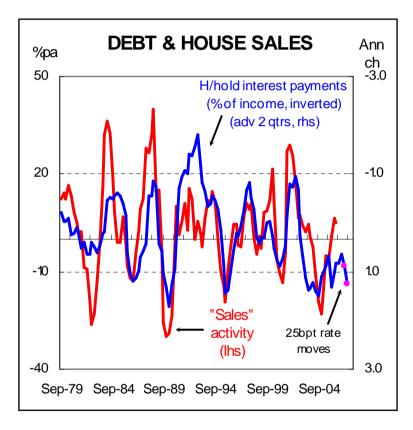


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### **Household Strain - Debt**

### Paying the piper



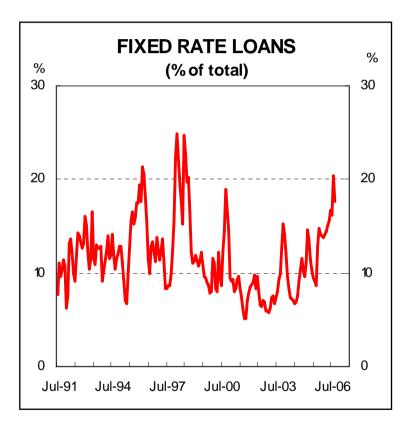


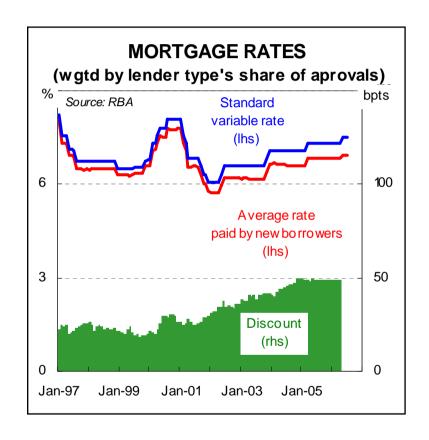
- Adverse trends in credit card indicators an indication of h/hold budget strain.
- Rising debt servicing implies risks lie with slower spending.

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### **Household Strain - Interest Rates**

#### **Consumer Insurance - Part 1**



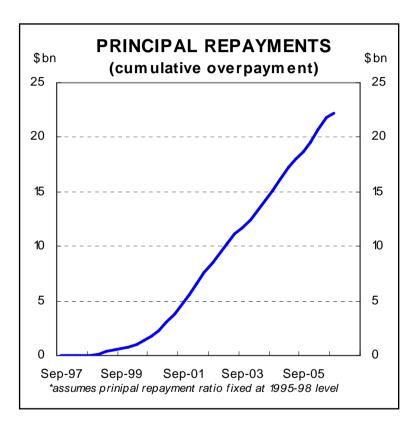


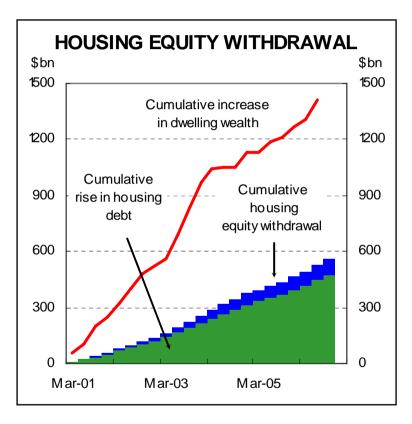
- Fixed rate lending running at high levels.
- Competition limiting flow through of RBA actions to lending rates.

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### **Household Strain - Interest Rates**

#### **Consumer Insurance - Part 2**



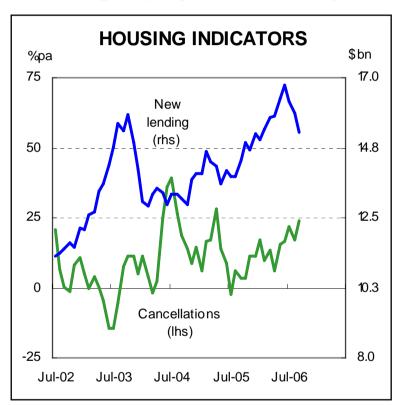


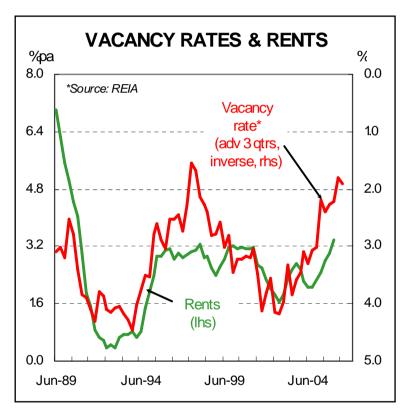
- Borrowers continue to repay loans at a rate in excess of contractual commitments.
- Accumulated housing wealth is a significant untapped financing source.

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# Housing

### **Demography is Destiny**



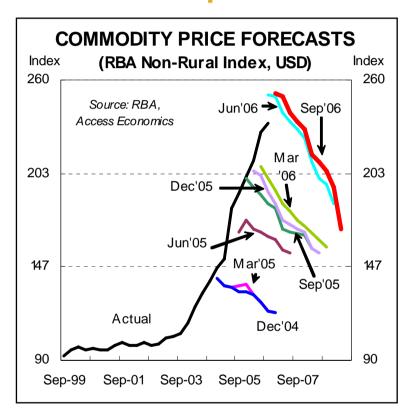


- Housing activity has slowed in response to higher interest rates.
- Demographic drivers favour a lift in residential construction.

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# **Commodity Price Bust?**

### What Goes Up Must Come Down?



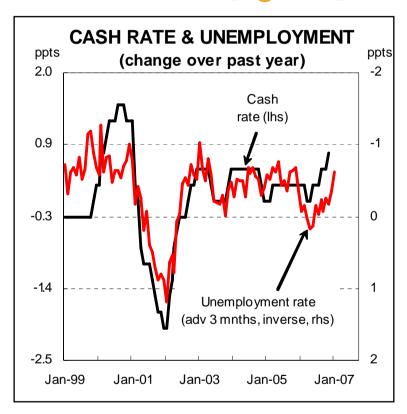


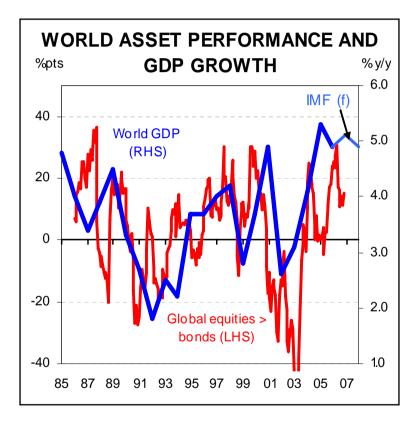
- History says commodity booms are followed by busts.
- But the demand-supply balance still looks favourable.

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### **Interest Rates**

### One and Done [again?]



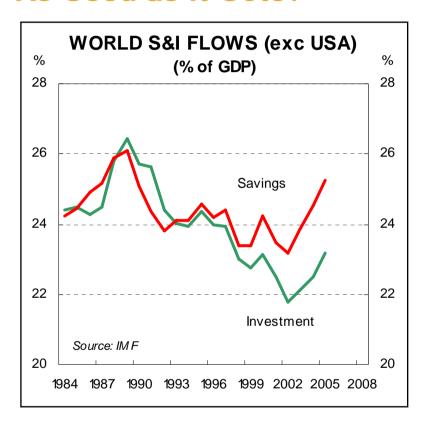


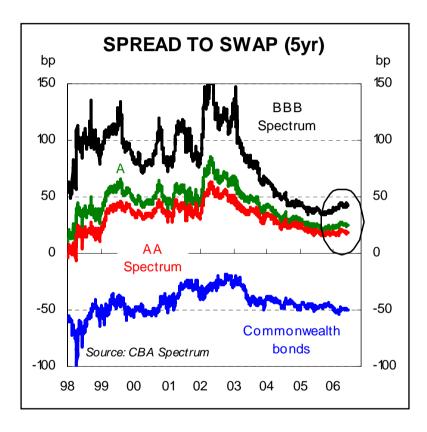
- Tightening bias remains but tough test for getting a 6½% cash rate over the line.
- Global economic backdrop favours growth assets over yield.

Notes			

### **Credit Markets**

#### As Good as it Gets?





Background conditions favour a lift in M&A activity.

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### **Our View**

#### Global growth momentum to continue

- US is slowing but Japan and Asia to absorb any slack;
- Underlying commodity price outlook still favourable;
- Period of low interest rates and excess global liquidity over;
- Background conditions favour a repricing of risk.

#### Australia retains momentum and inflation risks remain

- Business capex and prospective export lift are rebalancing growth;
- High petrol prices and rate rises exposing highly leveraged households;
- Rising terms-of-trade to keep spending pushing against capacity;
- Inflation risks to the high side but fundamental drivers relatively favourable;
- Drought a significant drag.

#### **Economic policy and markets**

- RBA to maintain a tightening bias;
- Bonds still vulnerable to higher risk premia;
- AUD to the high side of the range.



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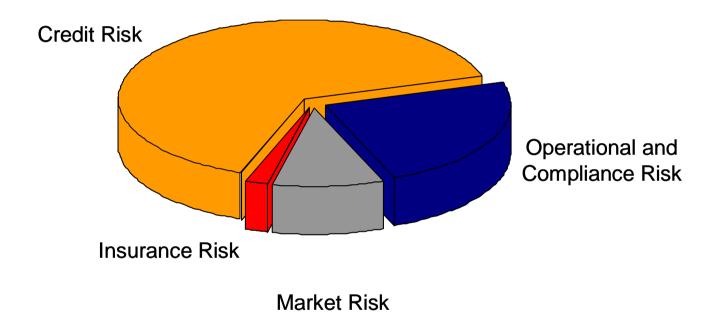
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Mick Leonard
Chief Risk Officer

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## **Our Risks**



**Economic Capital - 30 June 2006** 

Notes			

# **Today**

- Risk Management as a strategic and operational advantage
- Looking forward

Maximising investment in Risk Management



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# A Strategic and Operational Advantage

### **Our strengths:**

- People
- Identification & Measurement
- Pricing for risk
- Tools
- Processes

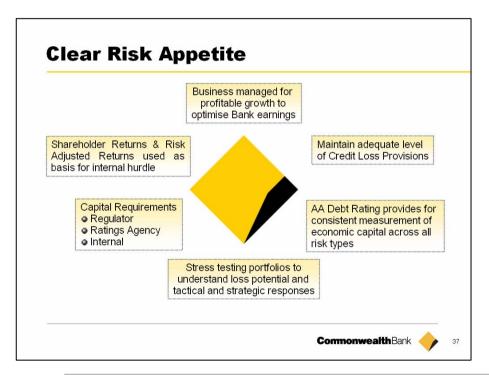


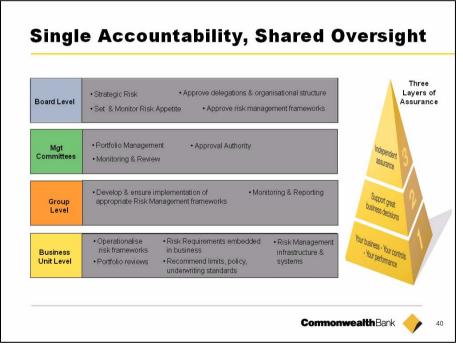


# Our philosophy: Together we deliver optimal

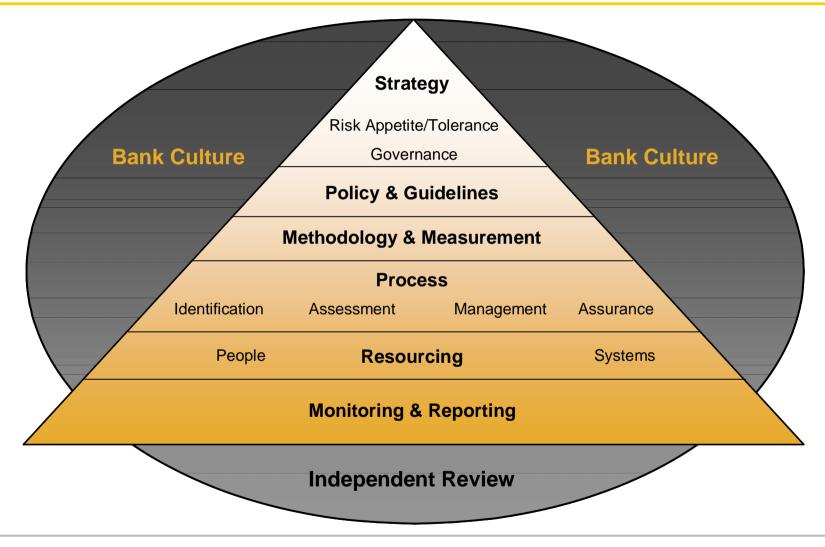
customer outcomes

### **Notes**



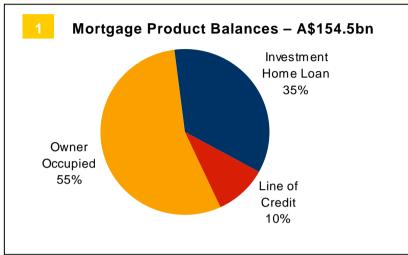


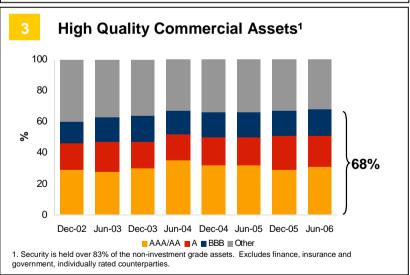
## How We Manage Risk Bank-Wide

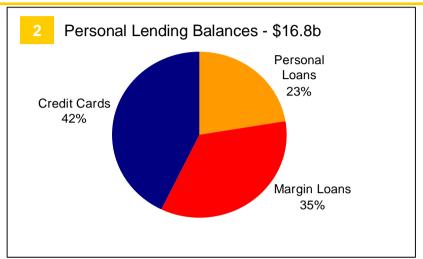


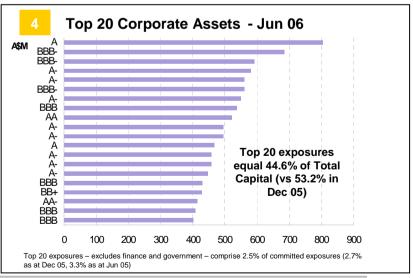
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## **Looking Forward**



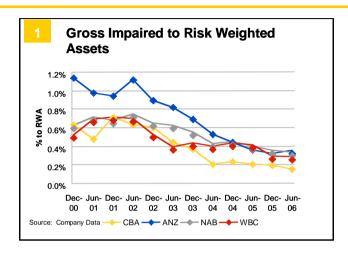


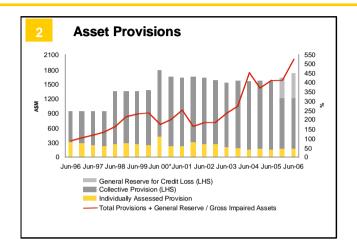




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## Low Bad Debts and Well Provisioned





### AIFRS Adjustment as at 1 July 2005

	AIFRS	AGAAP	Variance
	\$m	\$m	\$m
Collective / General Provision	1,021	1,390	(369) <sup>3</sup>
Other Balance Sheet Items <sup>1</sup>	75	-	75
Sub-Total Individually Significant /	1,096	1,390	(294)
Individually Significant / Specific Provision <sup>2</sup>	191	176	15
	1,287	1,566	(279)

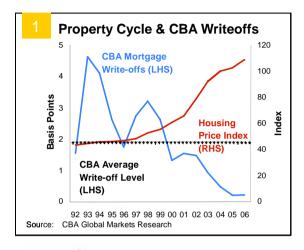
<sup>1.</sup> This amount was previously included within the Australian GAAP General Provision, and under AIFRS must now be reclassified within "Assets at fair value through profit and loss", "Available-for-sale assets" and "Other Liabilities"

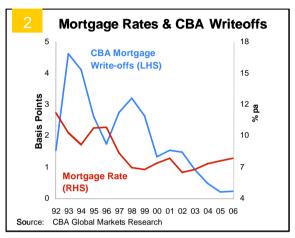
2. Includes interest reserved of \$19 million

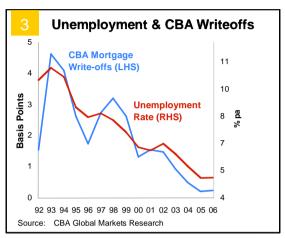
3. This adjustment will be largely offset by the creation of a General Reserve for Credit Loss.

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## **Key Indicators**









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## **Monitoring Sensitivities**

- Retail unsecured
- Automobile Industry, including Auto parts
- Grape growing
- Property developers

Some aspects of agriculture

Discretionary Retail



Notes			

## **Managing Sensitivities**

- Stress Test the Portfolio
  - Internal
    - an event driven approach i.e. a worst case economic downturn, to assess the impact on the portfolio of exceptional but plausible large loss events
    - specific parameters based on a hybrid between historical experience and a hypothetical future case
  - External
    - APRA Panama
    - IMF Financial System Stability Assessment
- Contingency Planning
- Diversification
- Recovery Workout Group
- Opportunities



Reduced Volatility = Predictable Earnings

## Other Key Information

## **Notes**

### **Regulatory Developments**

### Sarbanes Oxley

- A review of the design and operating effectiveness of SOX internal controls over financial reporting was conducted and independently tested for the 2006 Financial Year.
- This was undertaken to support an internal SOX compliance management assessment across the Bank.
- It concluded that there were no material weaknesses identified as at June 30th 2006 and that the Bank's internal controls over financial reporting were effective as at that date.
- The benefits from SOX include improved controls and testing regimes, with improved visibility and clarification of control ownership. Management's external Certification is on track for June 30th 2007.
- Significant announcements are expected from the PCAOB and US SEC about December 2006.

### **AIFRS**

- The Bank adopted the Australian equivalent to International Financial Reporting Standards (AIFRS) from 1 July 2005.
- Ongoing convergence project between the International Accounting Standards Board and FASB (US Accounting Standards setters).

### Basel II

- The Bank is targeting Advanced accreditation for Basel II for both credit risk and operational risk
- The Basel II project has assisted in the elevation of risk management culture throughout the Bank. The implementation of improved risk management awareness, processes and systems mean that we can:
  - Package and price our products more competitively
  - Making better decisions, taking risk into consideration
  - Optimise our regulatory capital position
  - Support our objectives of excelling in customer service
- The Bank awaits advice from the regulator for standards related to Pillar II & III. We are on target for 1 January 2008, with the parallel run for 2007.

#### Anti Money Laundering & Counter Terrorism Financing

- The proposed new legislation for AM/CTF signals a move to a risk based system. The Bank continues to work with the regulator (AUSTRAC) and Industry bodies to finalise the rules. The Bank is also updating its AML risk assessment and will complete a scoping study following the passage of the Bill.
- Our approach will be to implement a program with minimal disruption to our customer relationships, while leveraging our technology investment in CommSee and the Group Data Warehouse

**Commonwealth**Bank



## **Maximising Investment in Risk**

## Approach:

## **Anti Money Laundering**

Optimise business outcomes versus compliance

### **Benefits:**

**AIFRS** 

- Package & price our products more competitively
- Optimise capital
- Improved processes & systems
- Better decisions that reflects risk
- Improved risk awareness
- Support our objectives of excelling in customer service

**Sarbanes Oxley** 

**Investment = Delivering Business Growth** 

Basel II

Notes			

## **Key Messages**

- Strategic & Operational Advantage
   Bank-wide
- Reduced Volatility —— Predictable Earnings
- Investment —— Delivering Business Growth

# Together we deliver optimal customer outcomes





**Jim Evans** 

Executive General Manager
Risk Management & Compliance
Wealth Management

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## **Today**

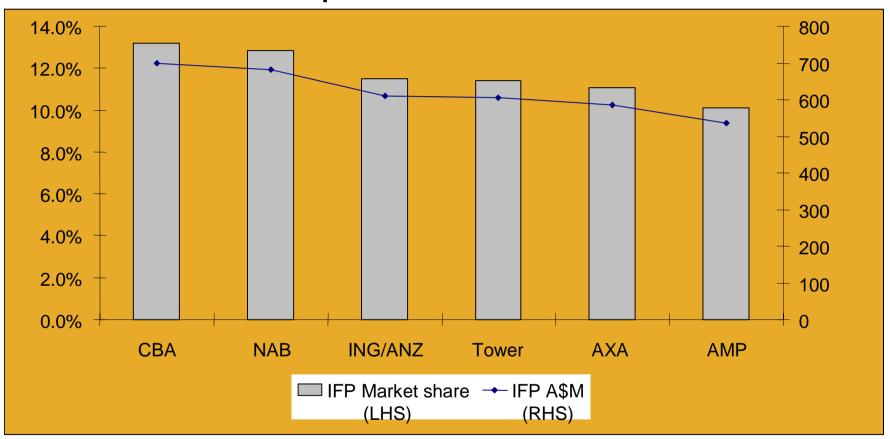
- About our business
- What we do
- How we manage risk
- Risk Management cycle
- How we complement the Bank's products and services



Notes			

## **About Our Business**

### Life insurance – in force premium market share



Source: Data per Plan For Life as at 30 June 2006.

CMLA Life assets as at Oct 06 \$22.6 bn

CMLA Life net assets as at Oct 06 \$1.2 bn

Notes			

## What We Do

- Insurance businesses offer products that are promises to pay
- The promise is either event based or time based
- Examples are losses that arise from accident, weather, earthquakes
- For people these can be sickness, disability, temporary loss of income or time based, being superannuation.



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## **How We Manage Risk**

- Governance processes
- Risk management cycle
  - Specifying the problem
  - Developing the solution
  - Monitoring the experience



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## **Governance Process**

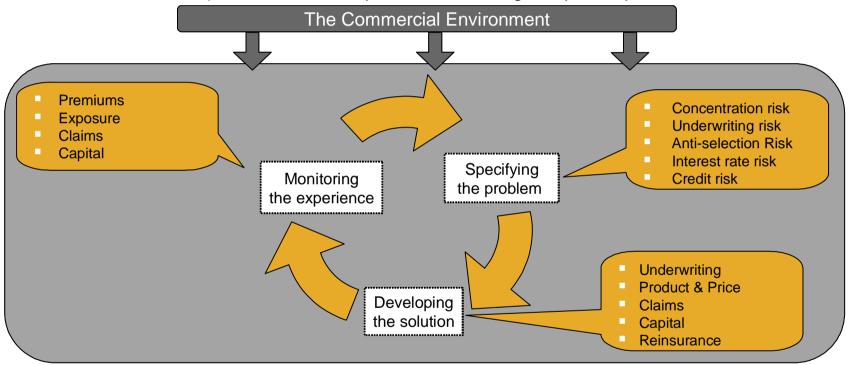
- Majority of Independent Directors
- Appropriate committee structures and members superannuation trustees – majority of independents
- Board and committee charters create agenda completeness.



Notes			

## Risk Management Cycle

- Insurers pool risks to consistently achieve required return on capital.
- A three stage risk management process is adopted where risks are constantly monitored (and new ones identified) with future assumptions revised in light of past experience.



Take risk opportunities to satisfy customer needs that are profitable to the shareholder

Notes			

## **Developing the Solution**

Example: Home & Content Insurance

- Underwriting risk
- Anti-selection risk
- Concentration risk
- Interest rate risk
- Reinsurance credit risk



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## Monitoring the Experience

Example: Home & Content Insurance

Regular monitoring identifies where & why actual experience differs from expected:

- New Business Sales
- Sales Conversion & Retention
- Exposure
- Claims
- Capital

Refine solutions (products) to enhance growth & market share



Notes			

# How we Complement the Bank's Products and Services

- What is different about insurance?
  - Evolution of time (Create wealth)
  - Event risk (Protect wealth)
- Products are designed to enhance people's lifestyles through either:
  - Wealth creation (Superannuation)
  - Wealth protection (Insuring assets)
- Complementary to Banking products

Risks are seen as an opportunity to help a customer in a way that is profitable to our shareholders

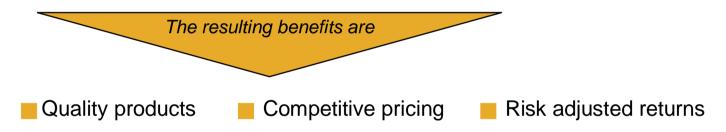
**Create and Protect People's Wealth** 

Notes			

# **Key Messages**

### Insurance businesses offer products that are promises

- Governance processes are critical
- Quality risk management is vital
- So that we can create and protect people's wealth



- Reduce volatility of financial results
- Competent and reliable management

### **Optimal Shareholder Returns**





**David Grafton** 

Executive General Manager
Credit Risk Management and Analytics
Retail Banking Services

Notes			

# **Today**

- What is happening in:
  - Retail Credit Risk Management
  - Retail Credit Portfolios
- What are the improvements driving performance?
- The benefits



Notes			
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# What is Happening in Retail Credit Risk Management?

- Considerable investment in improving capability
- Talented team of scale and capability
- All credit scorecards rebuilt and range of new ones implemented
- New parameterised credit risk management software systems

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### **Centre of Excellence**

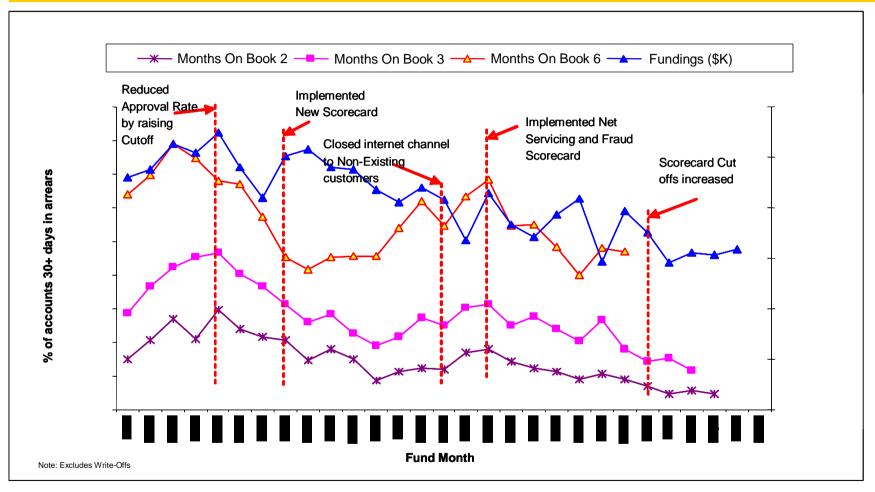
- Small Business Automation
- International [NZ, China, Indonesia]
- Group Security [fraud]
- Group Risk Management [Basel models]



Leveraging capabilities across the Bank

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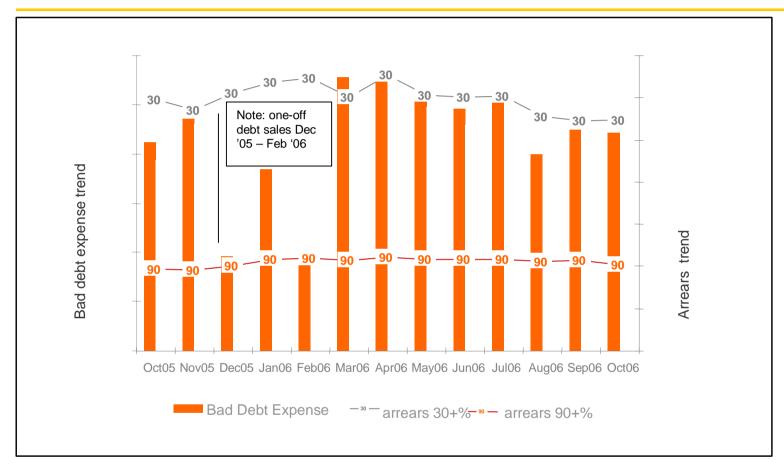
# **Credit Portfolio: Results from Improved Capability - Personal Loans**



Increased quality of new business

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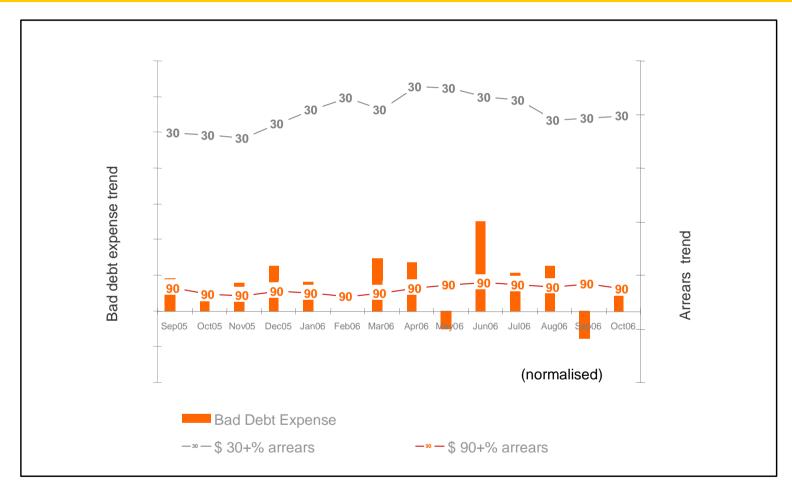
## **Credit Cards - Recent Improvements**



Scorecards implemented plus new decisioning software driving arrears and loss performance

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# **Home Loans - In Great Shape**

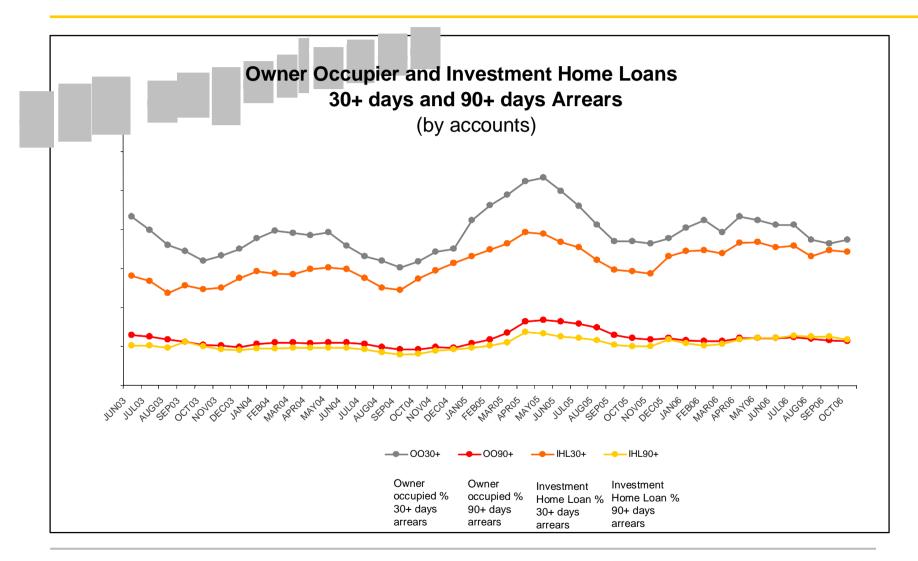


### Losses at historic lows, arrears flat

Notes			
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# **Home Loans - Dispelling Two Myths**

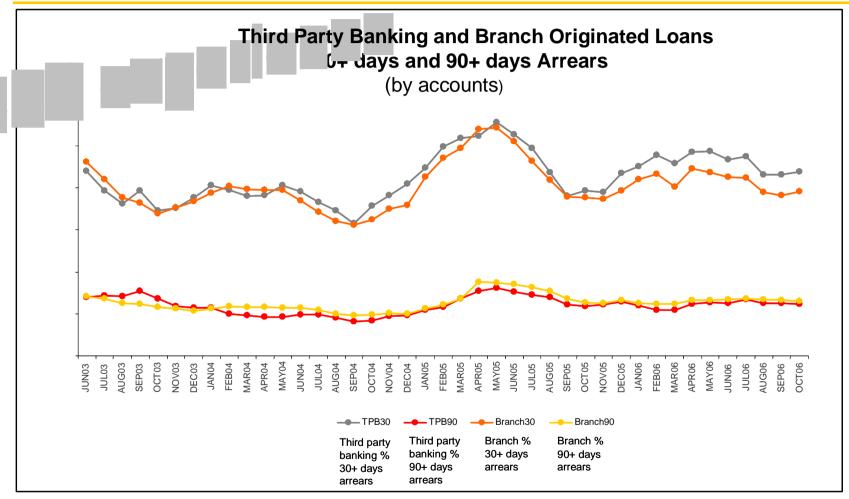
(1) owner occupied loans perform much better than investment loans



Notes			

# **Home Loans - Dispelling Two Myths**

(2) third party introduced loans perform much worse than branch originated loans



Quality accreditation program working well

Notes			

### **Home Loans - Low Doc**

- Low doc loans less than 1% of portfolio
- Less than 4% of monthly new business written
- Arrears 2-3 times higher
- Risk of loss with insurer not with CBA
- Low doc loans capped at 80% LVR
- Customer pays for LMI 60-80% LVR
- Bank pays for insuring 0-60% LVR
- Pricing for insurance premium not for risk of loss

Notes			

### **Home Loan Portfolio - Stress Tested**

#### **Market Value Stress**

FL (f)	PD Stress Factor						
EL (\$m)	1	2	4	6			
0%	10.3	14.1	20.1	24.8			
10%	27.3	38.4	56.7	70.6			
20%	58.6	84.8	128.6	161.8			
30%	103.6	153.1	236.4	299.4			

Note:

PD = Probability of Default EL = expected loss (\$m)



- Under current conditions, 1 year HL expected loss at around \$10m
- \$299m loss = 3 months home loan net income
- Loss = 0.27% total value of loans, under most stressed conditions

Notes			

# What are the Improvements Driving Performance?

- Instant and better retail credit decisions via new decisioning software, new models and CommSee
- Completely rebuilt all retail credit decisioning models and implemented in last 2 years
- Using Basel II for business advantage
- Leveraged competitive advantage by using customer data in all scorecards
- New fraud scorecards (leading the market)

### ....making better credit decisions

Notes			

### The Benefits

- Better credit models mean better credit decisions
- Better credit decisions mean reduced bad debt &/or increased business volumes
- Tools in place to optimise return for risk
- Financial benefits currently well over \$100m over life of loans booked through new scorecards

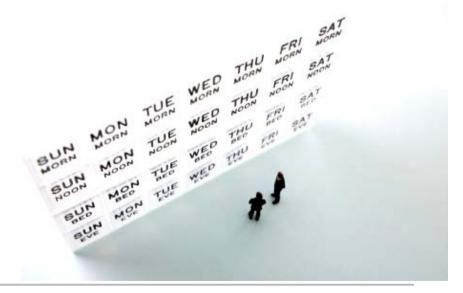


Better customer & shareholder outcomes

Notes			

# **Key Messages**

- Created new capability for the Retail Bank
- Leveraging these capabilities across the CBA
- Improvements providing better consumer credit decisions
- Better customer & shareholder outcomes





### **Paul Riordan**

Business Development & Risk Management
Premium Business Services
Market Risk

Notes			

# **Today**

- Governance & Execution
- Poachers turned Gamekeepers
- Key Metrics



### **Other Key Information**

### **Notes**

#### **Execution & Oversight** ALCO Market Risk and Product Control Committee Capital mix and Pipeline Revaluation Business Issues targets Committee Committee Committee Liquidity End-of-month rate Business related management Business limit requests validation issues Funding Delegations Manual - End-of-month fair value Unusual Transactions revision Transfer pricing adjustments All VaR and non-VaR Non-traded market Rate source and valuation excesses risk model approvals Back testing results Oversight of business Desk reviews performance and net Stress testing results Propose update to Group interest margin Propose update to Policy and approve PBS Group Policy and procedures approve PBS Sub-committees: Model procedures Review Committee and Equity Volatility Committee **Commonwealth**Bank 110

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## **Governance Framework**

	Market Risk (MR)	Operational Risk (Op Risk) & Compliance	Audit
Board Level	MR Appetite and Policies		
Mgt Committees	Approvals, ratification, monitoring, oversight as per Committee Charters	Approvals, ratification, monitoring, oversight as per Committee Charters	Assurance
Group level	MR Framework, Limit delegation Approvals and Monitoring	Op Risk & Compliance Framework	Independent Assurance
BU level	Framework implementation Independent Finance Function, P&L Monitoring	Op Risk & Compliance Framework Implementation & BU Compliance Framework	

### **Other Key Information**

### **Notes**

#### **Key Principles Clear Accountabilities & Authorities** Risk Policies, Limits & Trading Delegations Committee structure governs changes Group Risk Management oversight & governance Segregation of Duties & Effective Limit Independent Market Risk Management (MRM) Framework MRM establishes/monitors risk limit framework Independent Finance area **Transparency & Escalation** Daily risk reporting by MRM Escalation as appropriate through PBS/FRM Committees, Group Executives & Risk Committee, and Finance **Control Culture & Resourcing** Front office training, accreditation & discipline Specialist/experienced front office staff Specialist/experienced market risk staff **Robust Risk Measurement** Specialist quantitative resources in MRM with risk measurement accountability FRM oversight & model validation policy **Commonwealth**Bank

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# **Key Principles**

- Clear Accountabilities & Authorities
- Segregation of Duties and Effective Limit Framework
- Transparency & Escalation
- Control Culture & Resourcing
- Robust Risk Measurement

#### **Accountability, Transparency & No Surprises**

Notes			

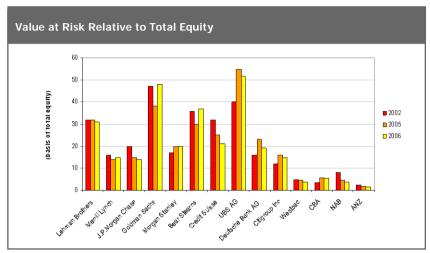
#### **Poachers Turned Gamekeepers**

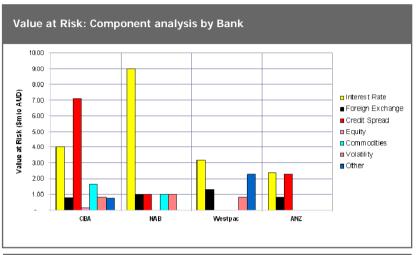
- Market Risk team led by market-savvy former trading professionals
- A mix of skills and experience aligned with both current risk concentrations and growth opportunities
- Physical co-location of risk teams with the business
- Allows deep understanding of business strategies, market opportunities and culture
- Supported by a formalised committee structure including front office, risk, finance, operations and audit
- Detailed reviews of linkages between risk positions and resultant financial outcomes
- Regular stress testing and scenario analysis

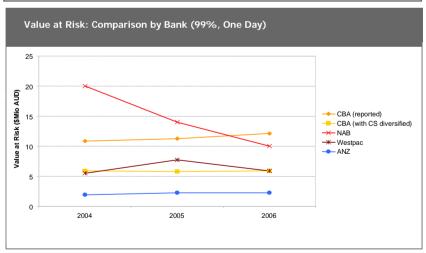
#### **Risk Optimisation, Not Risk Minimisation**

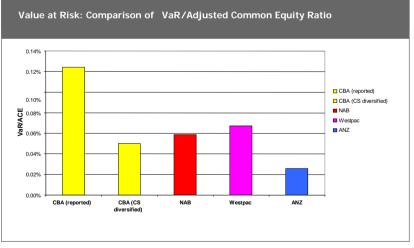
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#### **Snapshot - Key Market Risk Metrics**







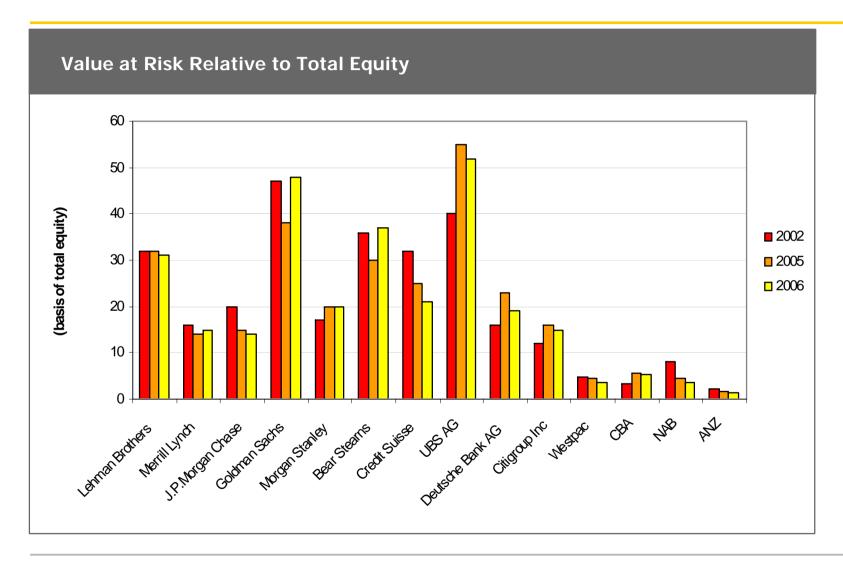


#### Sources:

- 1. Derived from data in each bank's annual report.
- 2. S&P report entitled 'Lifting the Lid on Traded Market Risk' published 31-Oct-2006



Notes			

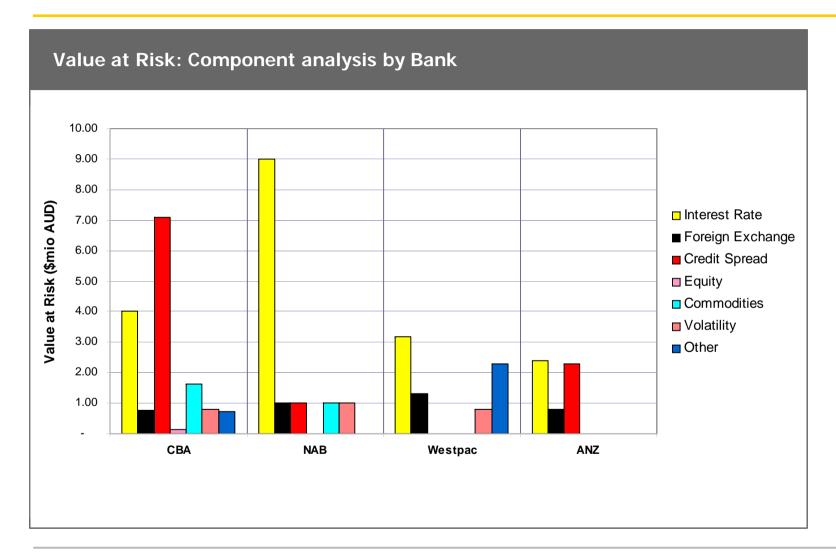


#### Sources

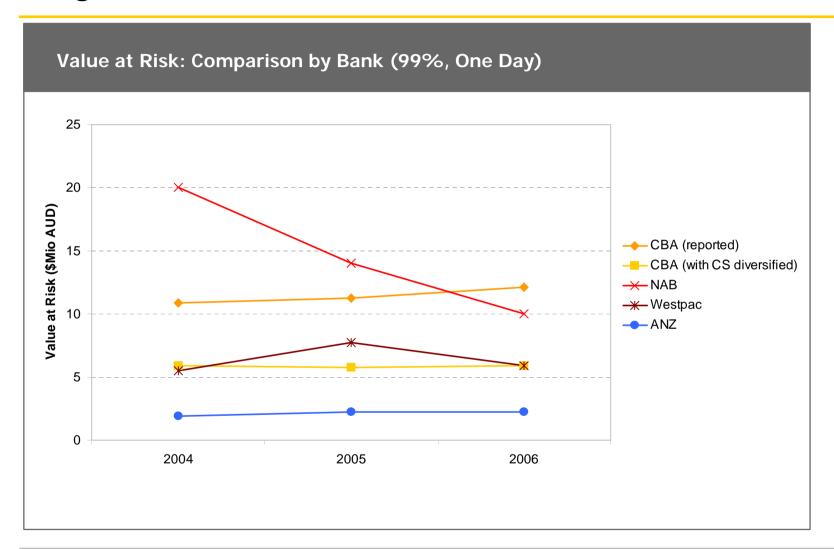
- 1. S&P report entitled 'Lifting the Lid on Traded Market Risk' published 31-Oct-2006
- Calculation for the four Australian Majors based on Total Equity (derived from data in each bank's annual report) and not 'adjusted total equity' as in the S&P report provided, as the study did not indicate what adjustments had been made



Notes			



Notes			



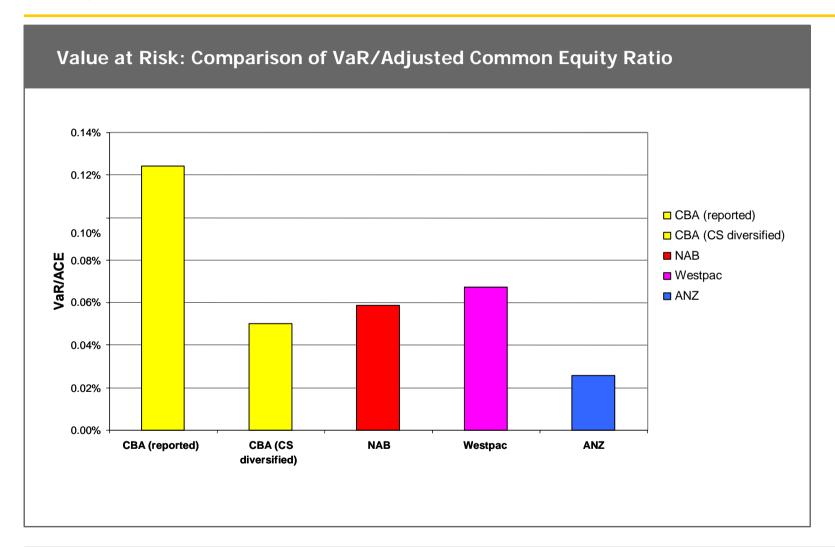
Source: Derived from data in each bank's annual report Note:

• CBA (with CS diversified) VaR diversifies Credit Spread VaR along with IR, FX, Equity and Commodity VaR.

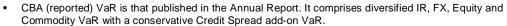


<sup>•</sup> CBA (reported) VaR is that published in the Annual Report. It comprises diversified IR, FX, Equity and Commodity VaR with a conservative Credit Spread add-on VaR.

Notes			



Source: Derived from data in each bank's annual report Note:



• CBA (with CS diversified) VaR diversifies Credit Spread VaR along with IR, FX, Equity and Commodity VaR.



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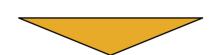
# **Snapshot - Key Market Risk Metrics**



Notes			

### **Key Messages**

- Robust governance framework
- Experienced hands-on oversight
- Strong risk culture



- VaR in line with domestic competitors (after adjusting for credit spread) and conservative by international standards
- Reported VaR not telling the whole story
- Comprehensive non-VaR controls in place



**Risk Optimisation, Not Risk Minimisation** 

Notes			

# To be Australia's finest financial services organisation through excelling in customer service



Notes			

#### **Panel Questions**



Michael Blythe



Mick Leonard



Jim Evans



**David Grafton** 



Paul Riordan