

Agenda for LGD - EAD Subcommittee Meeting 11 December 2018

Meeting Start: 1500 CET
Meeting duration: 1,5 hour
Location: by telephone and webex

Item No.	Start time	Item	Responsible	Info or Resolution	Material
		Standing Items:			
1.	1500	Minutes of the last Meeting, Action List and Forward Looking Calendar	ER/ML	I/R	X
2.	1510	Documentation Improvements - Collateral Valuation Types - Seniority Codes	ER	I/R	X
3.	1530	Industry Code proposal	NB	I/R	X
4.	1600	Implementation of LEI	RD	I/R	X
5.	1615	Updates on Methcom	RD	I	
6.	1620	Any other business	ML	I	

Anti-Trust Warning: participants are warned not to provide sensitive information about their financial institution or customers and are warned not to engage in discussions which might encourage or lead to collusive behaviour. If in doubt then please seek guidance from your own institution's policies or legal counsel.

Item 1

Minutes LGD - EAD Subcommittee Meeting October 23th 2018

Ref Minutes LGDSub 20181023

Members:

Martin Lulic - Chair	KfW
Stuart Neilson	Citibank
Ravi Kumar	Credit Suisse
Sourabh Jain	
Philippe Choquette	Desjardins
Carona Ly	EDC
Owen Cox-Dixon	
Robert Aiello	Goldman Sachs
Daniel Langer	Handelsbanken
Thomas Richardson	HSBC
Richard Larock	
Mark Kok	ING
Luis Bochner	JP Morgan
Robert Nebrich	M&T
Eric Swoboda	
Fabio Guacaneme	National Bank of Canada
Jorge Ruiz	
Elizabeth Moleda	RBC
Navin Gupta	
Philip Cox	Santander
Lan Jin	Scotiabank
Anna Brohlin	SEB

Executives: Erik Rustenburg (minutes), Riëtte Dijkstra

Venue: by webex and telephone

Meeting Start: 1500 CET

Item numbers are from the agenda and are presented here in the order in which they were discussed.

Anti-Trust Warning: participants were warned not to provide sensitive information about their financial institution or customers and were warned not to engage in discussions which might encourage or lead to collusive behaviour.

The quorum is reached for decision making.

Item 1: Minutes from the Meeting and Action List

The minutes of the meeting are approved.

No further remarks on the forward-looking calendar.

Item 2: Documentation Improvements - Combined Structure Guides

The combined Input and Output structure document was presented.

Following addition and change were requested:

- Include legend to explain the colours in the document.
- Change sheet name (currently GCD Data Input Guide) to reflect both input and output structure.

Approval is asked for the implementation of the combined input and output structure, considering above requested addition and change.

Vote: all in favor

Item 3: Documentation Improvements - Collateral Valuation Types

A proposal is made to add 2 new Collateral Valuation types: 210 and 220, to reflect whether a haircut has been applied.

The following remarks were made and need further investigation and discussion:

- The haircut is not in the data so that makes it difficult to compare data when a haircut is applied.
- Whether the accounting standards for the borrower balance sheet are known as the book values can have different meanings (e.g. German GAP vs IFRS). This also needs further discussion.
- In the documentation and current methodology all valuations are depicted with no haircut.

No vote for this proposal during the meeting.

Item 4: Documentation Improvements - Collateral Types

1. The following proposals are made for Collateral Type 810 – Oil and Gas Reserves and Mines:

- Removal of Type 105 – General Collateral
- Addition of Types 811 – Oil and Gas Reserves and 812 – Other Mining rights
- Remapping of 810 to either 811 or 812 or other collateral types where possible
- Addition of Validation Rule

The question is raised whether the Validation Rule checking for Collateral Type 810 can be an error instead of a warning. Argument against this is that this will force members to choose 999 in case they don't know whether it is oil and gas or mining, whereas 810 is a better option when members don't know.

Final proposal:

- Removal of Type 105 – General Collateral
- Addition of Types 811 – Oil and Gas Reserves and 812 – Other Mining rights
- Remapping of 810 to either 811 or 812 or other collateral types where possible
- Addition of Validation Rule
- Add question – mandatory to answer - in H1 2019 pre-submission and audit package whether members are able to remap 810 to either 811 or 812

Vote: all in favor

Action item: report to the Subcommittee after the first submission cycle in 2019 what the status is of the use of 810.

2. The following proposals were made regarding a change from mandatory/optional status for Collateral Types:

Proposal:

- Change status for Collateral Value following Collateral Types from mandatory to not mandatory by removing these from Validation Rule COLL099:
 - Intangibles (700)
 - Life Policy (980)
 - Telecom Networks (900)
- Make status for Collateral Value for following Collateral Types mandatory by adding these to Validation Rule COLL099:
 - Marketable Securities Treasury Bills (111)
 - Other Marketable Securities (112)
 - Oil and Gas Reserves (811)
 - Other mining rights (812)

Vote: all in favor

3. Collateral Type and Project Finance

Proposal: Change VR LOAN094 from warning to error because there must be at least one project as collateral when Facility Asset Class is 7 – Project.

The remark is made that there can be situations where there is no Project as collateral, so when that is the case, members will not be able to submit the data.

This needs further investigation and discussion with members before any decision can be taken.

No vote for this proposal during the meeting.

4. Collateral Type Projects

Proposal: Change VR COLL043 from warning to error because the assumption is that when the Collateral Type is 910 – Project, also the Project Type should be provided.

There is no escape clause for Project Type, so it should be ensured that all members can provide the right Project Type.

Currently there are 36 cases where the Project Type is missing.

This needs further investigation and discussion with members before any decision can be taken.

Proposal:

Add question – mandatory to answer - in audit package to check whether members are able to provide a project type for the 36 cases that are missing.

No vote for this proposal during the meeting.

5. Commodity Types

Proposal: ensure the correct Commodity Type is provided for new Collateral Types 811 and 812:

- Collateral Type 811 – Commodity Type 101 - Oil and Gas
- Collateral Type 812 – any Commodity Type except 101

This will be handled via Validation Rules COLL040 and 2 new VRs.

Vote: all in favor

Item 5: Financials for Guarantors

In the return data set there is incomplete financial data for Guarantors because there is no default date and thus no FX rate to make the conversion to Euros.

To solve the issue and convert 8282 financial unconverted records to Euro a decision must be taken which date should be used for the FX rate. For 53 of these 8282 cases there are multiple loans attached to the guarantor, so for these cases a decision must be taken which default date should be used.

Proposal:

- Use the default date like is done for all other conversions done in the dataset.
- For borrowers with multiple loans attached: use the earliest default date.

The question is asked why the Financial date is not used as date for the FX rate. This is related to the fact that for all conversions made in the dataset the Default date is used, amongst others also to prevent FX risk in the LGD calculations.

The Subcommittee decided not to take a decision/vote on this proposal and refer it to Methcom.

Item 6: Updates on Methcom

- Removing the CMR for Facility Class Banks and Financial Institutions has been discussed, this is not approved by Methcom yet and the request was made to provide more insight in the method that was used to prove that this would be possible.
- Example of the VRs in the output structure has been presented.
- Addition of the optional field LEI in the PD & Rating dataset, next step is to include the LEI also in the LGD dataset.

The chair closed the meeting at 16:40h CET

Action List LGD – EAD Subcommittee
December 2018

AP No.	Content	Holder	Due Date	Closed
LGDSC20170502-03	Create proposal for Restructuring After Default	ER/ML	2018	
LGDSC20170905-03	Analyse different Rank_Of_Security values per collateral on H2 2017 data	NB/NR	2018	
LGDSC20180424-01	Create specifications for HVCRE indicator	NB/ER	2018	
LGDSC20181023-01	Report status of availability of Collateral Type 810 – can this type be removed?	ER	H1 2019	

New items will be included in *Italic* letters and closed items will be marked in light grey

Responsible	Item	Description	Comments	Methcom item yes/no	Priority	December	January
Items in progress							
ER	Financial Table	Entity Sales, Entity Assets and Entity Total Debt: fields not filled in output dataset for guarantors because FX rate is linked to Default Date and for guarantors there is no default date in the database.		Yes - Implementation proposed H1 2019	Medium		
ER	Documentation Improvements	Documentation improvements Collateral Valuation Types Seniority Codes Combined Structure Guides Integrated Documentation FAQ		Yes - Implementation proposed input structure H1 2019	Medium	X	
HT/ER	Industry groups Holdings and Private Banking	Review industry codes. - Potential Collection of Raw industry codes. - Connection with FAC - Connection with Facility Types - Industry groups Holdings and Private Banking		Yes - H1 2019	High	X	
NB/ER/RD	<i>Legal Entity Identifier</i>	<i>Implementation of LEI in LGD database</i>		<i>Yes - Desired implementation H1 2019</i>	<i>High</i>	<i>X</i>	
Items to be planned							
HT/NB	Treatment of Costs	Request from NA banks on how to deal with costs that are repaid or not repaid - new Transaction Types		Maybe - Depending on outcome	Medium		
NB	Recurring defaults	Recurrent defaults: e.g. Shipping analysis: recurring defaults is common in last years, but because these are submitted as new defaults it is difficult to recognize recurrent defaults and analyse these	Is on action item list Methcom: EBA guideline analysis	Yes	Medium		
RD	Negative Pledge as a field in the GCD LGD database	From the EBA benchmarking for Low Default Portfolio it is shown that LGD with or without Negative Pledge is requested separately, indicating that the model segmentation is also used by other banks (column 300 and 310 Annex IV of Final Draft RTS and ITS on Benchmarking Exercise)		Maybe - Depending on outcome	High		
NB	SME: comparison of LGDs	Compare SME LGDs regard to seniority - subordinated vs supersenior		No	High		
RD	HVCRE Indicator	Request from NA banks to add an HVCRE indicator for Real Estate Collateral		Yes	Low		
ER	Borrower_Internal_PD	Question: do we want to include one or more of the fields available for guarantors: Guarantor_Rating_Fitch/Guarantor_Rating_Moodys/Guarantor_Rating_SaP/Guarantor_Rating_Internal		Maybe - Depending on outcome	Low		
RD	Restructured Facilities	Further analysis and proposal on how to input restructured facilities		Maybe - Depending on outcome	High		
RD	Escape clauses	Review fields with escape clauses - eg Guarantor Financials.	Do we want more mandatory fields?	Maybe - Depending on outcome	Medium		

Item 2

Collateral_Valuation_Type	Description	Definition	Comment	Collateral Types guidance
100	Market value by a third party	Value estimated by a third party	A value is estimated by a party outside the bank. For example a registered valuer values a piece of real estate for a type 500 collateral. A quoted market value on a stock exchange or a Bloomberg terminal would be a third party value for Marketable Securities (110 to 112).	110 or 111 or 112 or 120 or 350 or 360 or 410 or 420 or 430 or 440 or 500 or 700 or 800 or 810 or 811 or 812 or 900 or 910 or 980
200	Book value as per the Borrower's balance sheet	The value of the asset provided as collateral from the latest balance sheet of the borrower before the event date without any adjustments by the lender.	For example accounts receivables (200) would be entered as the net value on the balance sheet after provision for bad debts. For specific fixed assets (410) such as a printing press equipment please use the depreciated value shown in the balance sheet. For a floating charge collateral (400) the lender normally aggregates the book values of accounts receivable, inventory and plant and equipment. The book value should be entered without haircut. If you adjust the balance sheet value, please use 300, 310 or 320.	120 or 200 or 300 or 350 or 360 or 400 or 410 or 600 or 700 or 980
300	Value estimated by the lender	Market Value estimated by the lender, method unknown.	<i>Please use either 310 or 320 below. Only use this when you know that you (the lender) have estimated the value of the collateral, but you are not clear on whether this has been done using an analytical or a statistical method.</i>	100 or 110 or 111 or 112 or 120 or 200 or 300 or 350 or 360 or 400 or 410 or 420 or 430 or 440 or 500 or 800 or 810 or 811 or 812 or 900 or 910 or 980
310	Value estimated by the lender – Analytical	Market Value estimated by the lender, calculated based on a complete reappraisal of the collateral similar to the initial appraisal carried out at the time of the original loan	Eg. Plant and equipment listed by type and age with lookup value from recent auction prices on websites.	100 or 110 or 111 or 112 or 120 or 200 or 300 or 350 or 360 or 400 or 410 or 420 or 430 or 440 or 500 or 800 or 810 or 811 or 812 or 900 or 910 or 980
320	Value estimated by the lender – Statistical	Market Value estimated by the lender, using a simple haircut, price index, macro economic factor model or rental income index	Eg. Family Home revalued by taking a original market value and multiplying by the family home price index movement for that city between the date of last valuation and today.	100 or 110 or 111 or 112 or 120 or 200 or 300 or 350 or 360 or 400 or 410 or 420 or 430 or 440 or 500 or 800 or 810 or 811 or 812 or 900 or 910 or 980



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Collateral Valuation Types

LGD Subcommittee Meeting 11th December 2018

Erik Rustenburg

Collateral Valuation Types

Executives revised the Collateral Valuation Types lookup list after last Subcommittee meeting of 23rd October 2018 and made adjustments accordingly.

- Excluded from last LGD Subcommittee proposal
 - *Book value as per the Borrower's balance sheet, no haircut (210) (new)*
 - *Book value as per the Borrower's balance sheet, after haircut (220) (new)*
 - *Deductions from market value Haircuts field*
- Included since last LGD Subcommittee proposal
 - *Enhanced definitions and comments*
 - *Guidance on Collateral Valuations including a haircut are advised to put under: Value estimated by the lender – Statistical (320)*

No addition of Collateral Valuation Types and no impact on validation rules

Do we agree with the enhanced Collateral Valuation Types lookup in the input structure?

Seniority_Code	Description	Definition
100	Super Senior	Lender has made agreement with other lenders to “promote” this loan
110	Pari-Passu	By definition a loan is always Pari-Passu unless the lender has made agreements with other lenders to “promote” or “demote” itself
200	Subordinated or Junior	Lender has made agreement with other lenders to “demote” this loan
300	Equity	Only to be used for facilities which are Equity: Facility type 620 (Equity) or 630 (Debt/Equity Hybrids)
-1	Unknown	



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Seniority Codes

LGD Subcommittee Meeting 11th December 2018

Erik Rustenburg

Proposal Seniority Code – 300 – Equity

Current			Proposed		
Seniority_Cod	Description	Definition	Seniority_Code	Description	Definition
300	Equity	Only to be used for facilities which are "Equity/Bonds"	300	Equity	Only to be used for facilities which are Equity: Facility type 620 (Equity) or 630 (Debt/Equity Hybrids)

Bonds are another type of debt and debts could have Seniority Code: Super Senior (100), Pari-Passu (110) or Subordinated (200). And Equity is always subordinated to any type of debt, therefore:

- ❑ The proposed definition has changed and is now only allowing facility types related to Equity (620) or Hybrids (630).
- ❑ Bonds should fall under the other categories: Super Senior (100), Pari-Passu (110) or Subordinated (200).
- ❑ The numbers impacted:
 - In current database (H1 2018) there are 25 loans having a Seniority Code: Equity (300).
 - Accounts for 8 different member banks.

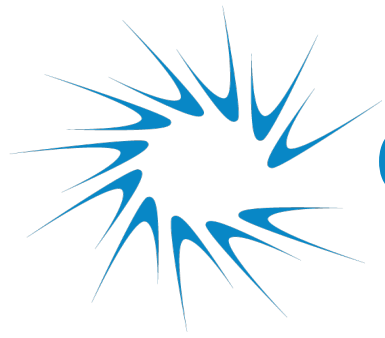
Impacted validation rules

On LOAN102 the Facility Type Bond in the Banking Book (890) will be excluded.

Table	Validation ID	Data Field	Trigger	Message	Type	Correctness / Completeness	Introduced	Amended	Change
Loan	LOAN102	Seniority_Code	Facility_Type = 620, 630 or 890 and Seniority_Code <= 300	Seniority_Code (%Seniority_Code%) must equal 300 when Facility_Type equals 620, 630 or 890.	Error	Correctness	H2 2017	H1 2019	Removal of Bonds

Proposal: The input structure on Seniority Code 300 will be with a renewed definition, by removing the Bonds and keep allowing Equity or Hybrids related to this type of Seniority Code. As well as the change of the Validation Rule LOAN102 as shown above.

Item 3



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Industry Data Enhancement

GCD Platforms

Subcommittees & Methcom

Request

- ❑ Members requested to have more granular GCD industry codes to help them with creating their segments.
- ❑ Members also requested to have raw industry codes (NAICS, SIC, NACE...) to identify more specific industry segments

Current State:

GCD has 22 Industry codes that banks can map using their industry codes to one of the standard look up tables provided in the Input Structure, NAICS, NACE, UK SIC.

Proposal:

Add granularity to some of the existing industry codes. (after receiving inputs from several banks and volumetric of the usage)

Allow banks to submit their raw NAICS, NACE, UK SIC codes in the Entity table.

Current codes & usage

A	B	Entity Count	Facility Asset Class											Grand Total
Industry_Code	Description	Industry_Code	1	2	3	4	5	6	7	8	9	10	11	
100	Agriculture, Hunting and Forestry	Manufacturing	11,529	3,843		7	32	188	45	24	2	4	30	15,704
150	Fishing and Fishing Products	Real Estate and Rental and Leasing	6,076	851	2	35	42	8,453	9	3	1	4	67	15,543
200	Mining	Wholesale and Retail Trade	11,481	2,196		1	6	189	14	194	1		25	14,107
250	Manufacturing	Construction	7,053	796				1,748	21	1		2	19	9,640
300	Utilities	Professional, Scientific and Technical Services	7,003	957	1	3	13	192	7	4	2	1	103	8,286
310	Utilities - Not Regulated	Unknown	3,145	1,052	8	6	1	1,063	14	3	17		91	5,400
320	Utilities - Regulated	Transportation and Storage	2,823	786	1	569	216	45	51	3	2	3	4	4,503
		Individual											3,591	3,591
350	Construction	Agriculture, Hunting and Forestry	2,777	337	1			203	7	13			93	3,431
400	Wholesale and Retail Trade	Private Sector Services (Household)	2,546	117				250	4		3	5	86	3,011
450	Hotels and Restaurants	Health and Social Services	2,252	226				87			3	21	62	2,651
500	Transportation and Storage	Finance and Insurance	248	88	2,181		1	7	1	1			4	2,531
550	Communications	Other Community, Social and Personal Services	1,869	355	1	1		60	19	1	2	33	44	2,385
600	Finance and Insurance	Hotels and Restaurants	1,937	236				149	3				4	2,329
650	Real Estate and Rental and Leasing	Communications	782	842				30	23	1	1	1	3	1,683
700	Professional, Scientific and Technical Services	Utilities	334	387	3	2		8	162	12	1	6		915
750	Public Administration and Defence	Mining	371	429		10		7	43	14	5	2	2	883
800	Education	Public Administration and Defence	229	43				7	2		44	33	3	361
850	Health and Social Services	Education	304	27				6			5	6	2	350
900	Other Community, Social and Personal Services	Fishing and Fishing Products	109	21				1		7				138
950	Private Sector Services (Household)	Extra-Territorial Services and Organizations	111	19									1	131
990	Extra-Territorial Services and Organizations	Utilities - Not Regulated		9										9
995	Individual	Utilities - Regulated							1					1
-1	Unknown	Grand Total	62,979	13,617	2,198	634	311	12,693	426	281	89	122	4,233	97,583

Revised Industry Codes

Industry Code	Description
100	Agriculture, Hunting and Forestry
1001	Agriculture
1002	Hunting
1003	Forestry
150	Fishing and Fishing Products
200	Mining
2001	Mining - Oil & Gas Extraction (Upstream)
2002	Mining - Metals and Nonmetals except Oil & Gas
250	Manufacturing
2501	Manufacturing - Automotive
2502	Manufacturing - Chemicals
2503	Manufacturing - Food and Beverage
2504	Manufacturing - Oil & Gas (Downstream)
2509	Manufacturing - Other
300	Utilities
3001	Utilities - Oil & Gas
3009	Utilities - Other (excluding Oil & Gas)
350	Construction
400	Wholesale and Retail Trade
4001	Wholesale and Retail Trade - Automotive
4002	Wholesale and Retail Trade - Durable Goods
4003	Wholesale and Retail Trade - Nondurable Goods
4004	Wholesale and Retail Trade - Other
450	Hotels and Restaurants
4501	Hotels
4502	Restaurants and Food services

NEW CODE
EXISTING CODE

500	Transportation and Storage
5001	Transportation - Air Transport
5002	Transportation - Rail Transport
5003	Transportation - Water Transport
5004	Transportation - Road Transport
5005	Transportation - Oil & Gas (Midstream)
5009	Transportation - Other
5010	Warehousing and Storage
550	Communications
600	Finance and Insurance
650	Real Estate and Rental and Leasing
700	Professional, Scientific and Technical Services
750	Public Administration and Defense
800	Education
850	Health and Social Services
900	Other Community, Social and Personal Services
950	Private Sector Services (Household)
990	Extra-Territorial Services and Organizations
995	Individual
-1	Unknown

- ❑ 7 Industry codes are expanded to have 26 subcategories.
- ❑ Remapping of NAICS, NACE and UKSIC to the new proposed GCD codes will be provided in the Input structure

Proposed changes for H1 2019

- 1) Entity Table – Input template changes
 - a. New column: Raw_Industry_code (optional field)
 - b. New column: Raw_Industry_code_type (optional field)
 - c. Remove column: Secondary_industry_code
- 2) Entity Table – Output template changes
 - a. Remove column: Secondary_industry_code
- 3) Look up changes
 - a. Revise Primary_Industry_Code lookup field, changes to include the new 26 subcategories.

These proposed changes are planned for LGD Platform only.

For the other PD and Benchmarking platforms, only change will be the revised lookup table for the Primary_Industry_code field.

Note: Raw codes for PD and Benchmarking platforms will be planned for after LGD platform changes are in effect and input from banks are analyzed.

Industry Survey (2018)

Industry Code Survey

This page shows analysis of submitted data, such as the number of submissions per component

Please select your internal industry code system(s) from below list. If not on the list, please select "Other" and provide details.

NAICS (North American Industry Classification System)	5
NACE (Nomenclature of Economic Activities)	3
GICS (Global Industry Classification Standard)	2
ANZSIC (Australian and New Zealand Standard Industrial Classification)	1
UK SIC	1
CANADA SIC	2
Other	3

- ❑ Survey conducted on member website and 15 banks provided input.
- ❑ Under category "Other" banks included more regional industry codes.

Entity Table – Changes in H1 2019

Raw_Industry_code

- ❑ Introduce new input columns for banks to enter their Raw Industry codes from one of the standards available: NAICS, NACE and UK SIC.
 - If banks use internal mappings, they still need to input one of the above standard codes, or fill with GCD Primary_industry_Code value.
- ❑ The new columns will be optional during first year of implementation and move to be a mandatory field.

Raw_Industry_code_type

Raw_Industry_code_type	Code	Description
1	NAICS(2012)	North American Industry Classification System (v2012)
2	NACE(2007)	Nomenclature of Economic Activities (v2007)
3	GICS	Global Industry Classification Standard
4	ANZSIC	Australian and New Zealand Standard Industrial Classification
5	UK SIC(2007)	UK Standard Industry Classification (v2007)
99	GCD Industry Code	GCD Industry Code

Entity Table – Changes in H1 2019

Input file							Existing	New	Delete	New
Lender_ID	Entity_ID	Entity_Name	Entity_Type	Default_Status	Country_Of_Residence	Entity_Asset_Class	Primary_Industry_Code	Raw_Industry_Code	Secondary_Industry_Code	Raw_Industry_Code_Type
999	1	Borrower	1	Resolved	US	1	250	331491	-	1

Input: New column: Raw_Industry_code (optional field)
 New column: Raw_Industry_code_type (optional field)
 Remove column: Secondary_industry_code

Output file							Existing
Lender_ID	Entity_ID	Entity_Name	Entity_Type	Default_Status	Country_Of_Residence	Entity_Asset_Class	Primary_Industry_Code
999	1	Borrower	1	Resolved	US	1	250

Output file does not change except remove column Secondary_industry_code

Timeline

H1 2019

H2 2019

H1 2020 (or later)

- ✓ GCD Industry Code field remains mandatory
- ✓ Collection of raw codes
- ✓ More granular GCD Industry Codes
- ✓ Revised Mapping of raw codes (NAICS 2012, NACE 2007, UK SIC 2007)

- ✓ Raw codes that have been entered in H1 2019 will be analysed in Audit.
- ✓ Provide new mappings for GIC and ANZSIC standards to the GCD Industry code.
- ✓ Analyze the need for other versions of the existing standards NAICS, NACE, UKSIC
- ✓ Revise Mapping of industry codes in relation with Facility asset class

- ✓ Banks will enter raw code field as mandatory.
- ✓ If banks don't have the one of the raw standard industry codes, they have the option to keep providing the GCD Industry code in the Raw industry code field (type 99)
- ✓ Validation Rules will be adjusted and expanded.
- ✓ GCD to build a logic to map the raw code to GCD industry code for the data return.
- ✓ Raw codes will be included in data return if enough data provided. Critical Mass rules will be implemented.

Item 4



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LEI in LGD Template

LGD Subcommittee Meeting 11 December 2018

Methcom 18 December 2018

Erik Rustenburg/Riëtte Dijkstra

Proposal: add LEI in LGD Template

- ❑ Legal Entity Identifier (or LEI) is a 20-character identifier that identifies distinct legal entities that engage in financial transactions. It is known globally and pushed by more and more authorities to be used to identify bank clients.
- ❑ LEI is already implemented in Benchmarking Platform, PD&Rating Platform (and ICC Platform)

Proposal: add the LEI as an optional field in the Entity Table

Table	Field	Definition	Data Type	Priority	Lookup
Entity	LEI	Legal Entity Identifier is a 20-character identifier that identifies distinct legal entities that engage in financial transactions.	Lookup	Optional	LEI Code

LEI Code Lookup

<https://www.gleif.org>

Data return – will be further discussed when data are entered in coming submission cycles

Example included that was discussed in Methcom meeting 13 November 2018

LEI ID Anonymisation

- ❖ An Over the time Consistent anonymized ID is given to each LEI like any other id within GCD called DA_Obligor_LEI

Deal_ID	DA_Deal_ID	Obligor_ID	DA_Obligor_ID	Obligor_LEI	DA_Obligor_LEI
DEAL01	1	OBLIG1	1	LEI01	1
DEAL02	2	OBLIG2	2	LEI02	2
DEAL03	3	OBLIG1	1	LEI01	1
DEAL01	4	OBLIG1	3	LEI01	1
DEAL02	5	OBLIG2	4		
DEAL03	6	OBLIG1	3	LEI01	1
DEAL01	7	OBLIG1	5	LEI03	3
DEAL02	8	OBLIG2	6		
DEAL03	9	OBLIG2	6		

Give to Get Principle & Lender entitlement

Major principle of GCD which means that you need to contribute in a segment of data to get back the same data segment coming from the data pool of all banks. These rules are defined per data pool.

- ❑ ICC Give to Get at Field level (Within GCD we apply this for postal code, if lender provide us with postal code data for 80% of cases they receive back the postal code from the data pool. If less than 80 % they only receive back the postal codes they submit, not the postal codes of the entire data pool) :
 - If Obligor LEI is given for 90 % by the banks on certain segment , an Anonymized LEI is given.
 - You receive back your **own data**
 - You receive back your **own original ID**
- ❑ So :
 - If you submit 90% of LEI for a certain segment of Data
 - ❑ And You deliver the same LEI → You get back the Obligor_LEI and the DA_Obligor_LEI (similar to Benchmarking named Principle)
 - ❑ And You deliver the same LEI → You only get back the DA_Obligor_LEI and not the original Lei so you can't know the exact name of the customer.
 - If you don't submit 90% of LEI for a certain segment of Data
 - ❑ You only get back the Obligor_LEI and the DA_Obligor_LEI for your Own Data.

GCD Executives will analyze further once we receive data with LEI to ensure anonymity is kept. If not, GCD Executives could decide to change the rules, only provide Analytics or not release LEI at all.

ST LGD EAD Example

FULL DB																	
Lender_ID	Deal_ID	DA_Deal_ID	Obligor_ID	DA_Obligor_ID	Obligor_LEI	DA_Obligor_LEI	Product_Code	Risk_Country_Code	DA_Risk_Country_Code	Currency	FX_RATE_USD	Exposure_date	Exposure_amt	Exposure_amt_USD	Defaulted_Balance	Defaulted_Balance_USD	:
BANK01	DEAL01	1	OBLIG1	1	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK01	DEAL02	2	OBLIG2	2	LEI02	2	100	NL	BENELUX	EUR	1.15	1/02/2014	10000000	11500000	5000000	5750000	
BANK01	DEAL03	3	OBLIG1	1	LEI01	1	200	BE	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL01	4	OBLIG1	3	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL02	5	OBLIG2	4			100	NL	BENELUX	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL03	6	OBLIG1	3	LEI01	1	200	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK03	DEAL01	7	OBLIG1	5	LEI03	3	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK03	DEAL02	8	OBLIG2	6			100	US	WORLD	EUR	1.15	1/02/2016	10000000	11500000	5000000	5750000	
BANK03	DEAL03	9	OBLIG2	6			300	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	

Theoretical Entitlement			
Bank / Product	100	200	300
Bank 1	2014-2015	2015	-
Bank 2	2015	2015	-
Bank 3	2015-2016	-	2015

CMR 1			
Product	100	200	300
Lender	3 Lender	2 Lender	1 Lender

LEI Theoretical Threshold 50 % for exemple	
Bank 1	100%
Bank 2	66%
Bank 3	0%

Data return Bank 1																	
Lender_ID	Deal_ID	DA_Deal_ID	Obligor_ID	DA_Obligor_ID	Obligor_LEI	DA_Obligor_LEI	Product_Code	Risk_Country_Code	DA_Risk_Country_Code	Currency	FX_RATE_USD	Exposure_date	Exposure_amt	Exposure_amt_USD	Defaulted_Balance	Defaulted_Balance_USD	:
BANK01	DEAL01	1	OBLIG1	1	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK01	DEAL02	2	OBLIG2	2	LEI02	2	100	NL	BENELUX	EUR	1.15	1/02/2014	10000000	11500000	5000000	5750000	
BANK01	DEAL03	3	OBLIG1	1	LEI01	1	200	BE	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached
		4		3			100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		5		4			100	BENELUX	BENELUX	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		6		3			200	-	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached
		7		5			100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		8		6			100	WORLD	WORLD	EUR	1.15	1/02/2016	10000000	11500000	5000000	5750000	Only get 2014-2015
		9		6			300	-	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached

ST LGD EAD Example

FULL DB																	
Lender_ID	Deal_ID	DA_Deal_ID	Obligor_ID	DA_Obligor_ID	Obligor_LEI	DA_Obligor_LEI	Product_Code	Risk_Country_Code	DA_Risk_Country_Code	Currency	FX_RATE_USD	Exposure_date	Exposure_amt	Exposure_amt_USD	Defaulted_Balance	Defaulted_Balance_USD	:
BANK01	DEAL01	1	OBLIG1	1	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK01	DEAL02	2	OBLIG2	2	LEI02	2	100	NL	BENELUX	EUR	1.15	1/02/2014	10000000	11500000	5000000	5750000	
BANK01	DEAL03	3	OBLIG1	1	LEI01	1	200	BE	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL01	4	OBLIG1	3	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL02	5	OBLIG2	4			100	NL	BENELUX	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL03	6	OBLIG1	3	LEI01	1	200	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK03	DEAL01	7	OBLIG1	5	LEI03	3	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK03	DEAL02	8	OBLIG2	6			100	US	WORLD	EUR	1.15	1/02/2016	10000000	11500000	5000000	5750000	
BANK03	DEAL03	9	OBLIG2	6			300	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	

Theoretical Entitlement			
Bank / Product	100	200	300
Bank 1	2014-2015	2015	-
Bank 2	2015	2015	-
Bank 3	2015-2016	-	2015

CMR 1			
Product	100	200	300
Lender	3 Lender	2 Lender	1 Lender

LEI Theoretical Threshold 50 % for exemple	
Bank 1	100%
Bank 2	66%
Bank 3	0%

Data return Bank 2																	
Lender_ID	Deal_ID	DA_Deal_ID	Obligor_ID	DA_Obligor_ID	Obligor_LEI	DA_Obligor_LEI	Product_Code	Risk_Country_Code	DA_Risk_Country_Code	Currency	FX_RATE_USD	Exposure_date	Exposure_amt	Exposure_amt_USD	Defaulted_Balance	Defaulted_Balance_USD	:
		1		1		1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		2		2		2	100	NL	BENELUX	EUR	1.15	1/02/2014	10000000	11500000	5000000	5750000	Only get the 2015
		3		1		1	200	BE	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached
BANK02	DEAL01	4	OBLIG1	3	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL02	5	OBLIG2	4			100	NL	BENELUX	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL03	6	OBLIG1	3	LEI01	1	200	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached
		7		5		3	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		8		6			100	US	WORLD	EUR	1.15	1/02/2016	10000000	11500000	5000000	5750000	Only get the 2015
		9		6			300	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached

ST LGD EAD – Example

FULL DB																	
Lender_ID	Deal_ID	DA_Deal_ID	Obligor_ID	DA_Obligor_ID	Obligor_LEI	DA_Obligor_LEI	Product_Code	Risk_Country_Code	DA_Risk_Country_Code	Currency	FX_RATE_USD	Exposure_date	Exposure_amt	Exposure_amt_USD	Defaulted_Balance	Defaulted_Balance_USD	:
BANK01	DEAL01	1	OBLIG1	1	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK01	DEAL02	2	OBLIG2	2	LEI02	2	100	NL	BENELUX	EUR	1.15	1/02/2014	10000000	11500000	5000000	5750000	
BANK01	DEAL03	3	OBLIG1	1	LEI01	1	200	BE	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL01	4	OBLIG1	3	LEI01	1	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL02	5	OBLIG2	4			100	NL	BENELUX	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK02	DEAL03	6	OBLIG1	3	LEI01	1	200	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK03	DEAL01	7	OBLIG1	5	LEI03	3	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK03	DEAL02	8	OBLIG2	6			100	US	WORLD	EUR	1.15	1/02/2016	10000000	11500000	5000000	5750000	
BANK03	DEAL03	9	OBLIG2	6			300	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	

Theoretical Entitlement			
Bank / Product	100	200	300
Bank 1	2014-2015	2015	-
Bank 2	2015	2015	-
Bank 3	2015-2016	-	2015

CMR 1			
Product	100	200	300
Lender	3 Lender	2 Lender	1 Lender

LEI Theoretical Threshold 50 % for exemple	
Bank 1	100%
Bank 2	66%
Bank 3	0%

Data return Bank 3																	
Lender_ID	Deal_ID	DA_Deal_ID	Obligor_ID	DA_Obligor_ID	Obligor_LEI	DA_Obligor_LEI	Product_Code	Risk_Country_Code	DA_Risk_Country_Code	Currency	FX_RATE_USD	Exposure_date	Exposure_amt	Exposure_amt_USD	Defaulted_Balance	Defaulted_Balance_USD	:
		1		1			100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		2		2			100	NL	BENELUX	EUR	1.15	1/02/2014	10000000	11500000	5000000	5750000	Only get the 2015 - 2016
		3		1			200	BE	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached
		4		3			100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		5		4			100	NL	BENELUX	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
		6		3			200	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached
BANK03	DEAL01	7	OBLIG1	5	LEI03	3	100	BE	BE	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	
BANK03	DEAL02	8	OBLIG2	6			100	US	WORLD	EUR	1.15	1/02/2016	10000000	11500000	5000000	5750000	
BANK03	DEAL03	9	OBLIG2	6			300	US	-	EUR	1.15	1/02/2015	10000000	11500000	5000000	5750000	CMR 1 not reached

Item 5