

Agenda for Methcom Meeting 09 February 2021

Members:

Stephan Jortzik (chair)	Pubudu Premawardena (chair)
Patrik Gunnarsson	Ntateko Maimane
Michael Eichhorn	Andrea Buzzigoli
Eric Lin	Rohan Surana
Elizabeth Moleda	Stuart Neilson
Abhishek Kumar	Michael Jacobs
Clemens Mesterom	

Executives:

Erik Rustenburg	Richard Crecel	Nate Royal
Nunzia Rainone (minutes)	Michaël Dhaenens	Nina Brumma
Olivier Plaetevoet	Hale Tatar	Izelle Kirsten

External: Benjamin Galow

Meeting Start: 1200 CET

Location: by telephone and webex

Item No.	Start time	Item	Responsible	Info or Resolution	Material
		Standing Items:	-		-
1.	1200	Approval Draft M130 Minutes Methcom	NR	R	X
2.	1205	Action points	NR	I	X
3.	1210	Forward looking calendar	NR	I	X
4.	1215	Data quality Governance Project	ER BG	R	X
5.	1300	Industry Raw code: GCD stand point	NR	I	X
6.	1315	Outcome of LGD Subcommittee meeting	ER	I	X
7.	1325	Documentation update	ER	I	X
8.	1335	Outcome of BP Subcommittee meeting	HT	I	X

		Other Items	-		-
9.					

2021

February 2021, 1200 CET by Teams

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.

Draft Minutes of the Methcom Meeting held on 16 December 2020

Members Present: Stephan Jortzik (chair)
Pubudu Premawardena (chair)
Clemens Mesterom
Elizabeth Moleda
Michael Jacobs
Patrik Gunnarsson
Stuart Neilson

Excused: Michael Eichhorn
Abhishek Kumar
Andrea Buzzigoli
Eric Lin
Rohan Surana

External (d-fine): Benjamin Galow

Executives: Nunzia Rainone (at the minutes)
Erik Rustenburg
Michael Dhaenens
Nate Royal
Izelle Kirsten
Richard Crecel

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.

Matters are minuted in the order dealt with by the meeting with the numbering based on the agenda. Material for most of the issues to be discussed had been sent out in advance together with the agenda.

Meeting Start: 12:00 CEST

Quorum is met.

Item 1: Approval Draft 129 minutes Methcom October 27th 2020

The minutes were **unanimously approved**.

Item 6: Data quality Public Dashboard and Policy

ER presented the Data quality Public Dashboard.

The Public dashboard is very welcomed by the committee. In principle this is a good initiative, and the idea to link the DQ dimensions to the BCBS239 can promote GCD data usage and trust. The committee is asked to approve the concept. For the details of metrics and approach the committee members are invited to join GCD weekly meetings on Data Quality Governance.

Regarding the publishing of the dashboard, the committee would like to be sure that content will not jeopardize GCD reputation. Therefore, the final version of the dashboard will be shared with the committee members.

The Methcom **unanimously approved** the DQ public dashboard concept.

RC presented the Data Quality Policy.

PP commented that it is a valuable document where lots of good information and concepts are available. It is noted that an Executive summary to define the core concept of the policy should be included. In the policy there are references to other GCD policies. It should be further clarified in this policy what GCD should do regarding Data quality, whilst a separated document should report how and how much GCD is compliant with the policy itself. Moreover, the policy should indicate how it fits in relation to other GCD policies and official documents.

Actions: GCD to include Executive summary and references to previous GCD policies, to remove column "Is GCD compliant?" from the table at pg. 13 of the policy. Feedbacks will be incorporated in the document. Methcom will be updated on the enhanced version.

Item 4: Methcom Calendar and Forward Looking Calendar 2021

NR presented the proposed calendar for 2021. due to the amount of items to be discussed, the committee proposed and voted for having meetings every 6 weeks. the chosen platform is Teams.

Actions: NR to send invites for the whole year 2021.

Item 5: Review Subcommittee Charters

NR presented material. there are no changes for the LGD and Benchmarking platforms. only one change is in the PD subcommittee charter, according with the subcommittee will decide on Technical, non-methodological implementation details for the output structure.

\$ approval and one vote against.

The subcommittee charters are **approved**.

Item 7: GCD 2021 submission cycles plan

The GCD 2021 submission cycles plan has been presented. No remarks from the committee.

Item 8: Review of Country groupings/hierarchy table

NR presented the material. the concept of reviewing the table is accepted. There are some details to be enhanced. GCD is asked to analyse data and see the best hierarchy possible. Updates will be discussed in 2021.


Item 9 was not discussed as there was no time left. NR invite member to reach out her via mail in case of questions on it.

SJ closed the call at 14:10.

Item 2



Action points from Methodology Committee Meetings
December 2020

AP No.	Content	Holder	Due Date	Closed	Prio	Status
MC202010	Restructured Loans investigation	NR/ER	H1 2021		H	

Item 3

Item 4

Request to Methcom

Action Requested

MethCom to **approve on** the Questionnaire on Data Quality

Background and Status

- The Data Quality Project is part of the Compliance Working group. Delivering to members evidences and elements of documentation to proof to members that the GCD data used is compliant with internal and external requirements, e.g., regulatory requirements for banks using the data for IRB modelling purposes
- The Data Quality Policy GCD is stating the following principles:
 - “Yet, the detailed rules around collection of historical data (internal and external) can vary greatly between institutions and therefore GCD needs also to collect evidences of the rule set applied by each member bank.”
 - “To continuously reinforce GCD’s consolidated DQM, GCD is considering the possibility to also collect DQM internal evidences directly from members via appropriate internal measurements and reports.”
 - 2 targets to achieve:
 - 1) Questionnaire, help to understand how data quality is managed among the members
 - 2) Collect other official evidences (based on the survey outcomes questionnaire).

GCD Questionnaire Data Quality

The objective of this questionnaire is to perform a qualitative assessment of the operative data quality management of the member banks. GCD attempts to address all relevant dimensions in the GCD scope. Data will be collected anonymously via GCD website and aggregated, anonymous information will be provided back.

- » What is your bank readiness in regard of the implementation of the BCBS239?
 - a) Just starting
 - b) Fully implemented
 - c) In process and ramping up
 - d) Not available

- » **Scope of data management and governance**
 - › Do you periodically expand the scope of your data management as your needs (regulatory + business) shifts?
 - a) Yes
 - b) No
 - › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially

 - › What are the functions covered by data management?
 - a) Risk
 - b) Accounting
 - c) Other (Please specify.....)

 - › Is there any other area covered by data management?
 - a) Yes
 - b) No
 - › If yes, please specify....

 - › Is there a business usage of the data that are in the data management program and beyond the regulatory purposes (reporting and model)?
 - a) Yes
 - b) No

 - › Has there been a successful BCBS239 internal/ external audit of your data management?
 - a) Yes
 - b) No
 - › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially

- » **Implementation of data governance**

- › Does your institute have a CDO/ resource responsible for DQ?
 - a) Yes
 - b) No
- › Does your institute have explicitly defined roles and responsibilities w.r.t. to DQM (e.g. Data owners, Data remediation, Data quality management)?
 - a) Yes
 - b) No
- › Do the roles and responsibilities assigned cover the data send to GCD?
 - › Yes
 - › No
 - › Partially

» **Data lineage**

Data-lineage documents how the data flows throughout the organization. This is from the entry point to usage by different systems and users. Including advancing transformations to the data. With this an organization could identify critical (regulatory reporting, clients usage) and less critical paths.

- › Is data lineage evolving as quickly as the banking system?
 - a) Yes
 - b) No
 - c) Partially
- › Is the review of the data lineage scheduled regularly?
 - a) Yes
 - b) No
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially
- › What is the level of granularity in the data lineage (choose more than one if you have..)?
 - a) Loan level
 - b) File level
 - c) Mixed level
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially
- › Documentation of data lineage
 - › Which documentation approach do you pursue?
 - a) partial lineage documentation only (e.g. only on functional attribute level without technical lineage)
 - b) full data lineage for all data elements
 - c) full data lineage for critical data elements only (e.g. elements used for regulatory reporting)

- d) none
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially
- › Do you use a tool-based approach to document your data lineage (e.g. ETL tool, which supports automated data lineage documentation)?
 - a) Yes
 - b) No
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially
- › Is the data lineage tool based e.g. data lake to reduce the complexity of the data lineage?
 - a) Yes
 - b) No
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially

» **Data quality elements**

Improving data quality is one of the objectives of data management. Most banks have elements for measuring data quality and for analyzing, prioritizing, and mitigation.

- › Do you know about data quality risk taxonomy (e.g. risk identification, monitoring and mitigation)?
 - a) Yes
 - b) No
- › Which data quality dimensions (and respective taxonomies) do you use to measure data quality? (choose more than one option if you have...)
 - a) Completeness;
 - › please specify the used metrics
 - b) Accuracy;
 - › please specify the used metrics
 - c) Consistency/Stability;
 - › please specify the used metrics
 - d) Timeliness;
 - › please specify the used metrics
 - e) Uniqueness;

- › please specify the used metrics
- f) Validity;
 - › please specify the used metrics
- g) Availability/Accessibility;
 - › please specify the used metrics
- h) Traceability;
 - › please specify the used metrics
- i) Integrity;
 - › please specify the used metrics
- j) Adaptability;
 - › please specify the used metrics
- k) Comparability and adequacy;
 - › please specify the used metrics
- › Is the data quality over the data sent to GCD measured by the selected dimensions?
 - › Yes
 - › No
 - › Partially
- › How frequently do you revise and enhance your data-control framework?
 - a) On-demand if there are new requirements
 - b) Regularly on a semi-annual basis
 - c) Regularly on an annual basis
 - d) Other, please specify...
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially
- › Which data quality controls do you perform?
 - a) Testing
 - b) Tracing
 - c) Inference
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially
- › Do you apply statistical analysis to detect anomalies that might indicate accuracy issues?
 - a) Statistical limits; e.g. values that change beyond three standard deviations
 - b) Artificial intelligence or machine learning techniques
- › Does this apply to the data sent to GCD?
 - › Yes

- › No
- › Partially

- › Do you provide external/internal proof that your data is complete (sign-off process for submission to GCD)?
 - a) Yes
 - b) No

» **Transaction testing**

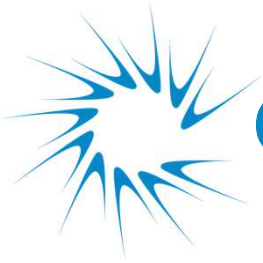
Transaction testing involves checking whether the reported value of data at the end of the journey matches the value at the start of the journey (the source).

- › Do you use transaction testing, i.e. checking whether data in the reports still matches its source values?
 - c) Yes
 - d) No
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially

- › Do you perform transaction testing as an ongoing exercise (rather than a one-off effort)?
 - a) Yes
 - b) No
- › If yes, how often?
 - › On-demand if there are new requirements
 - › Regularly on a semi-annual basis
 - › Regularly on an annual basis
 - › Other, please specify
- › Does this apply to the data sent to GCD?
 - › Yes
 - › No
 - › Partially

- › Do you use the issues found by transaction testing to improve data governance processes?
 - a) Yes
 - b) No

Item 5



Global Credit Data

by banks for banks

Industry Raw code

Methcom 9th February 2021

Request to Methcom

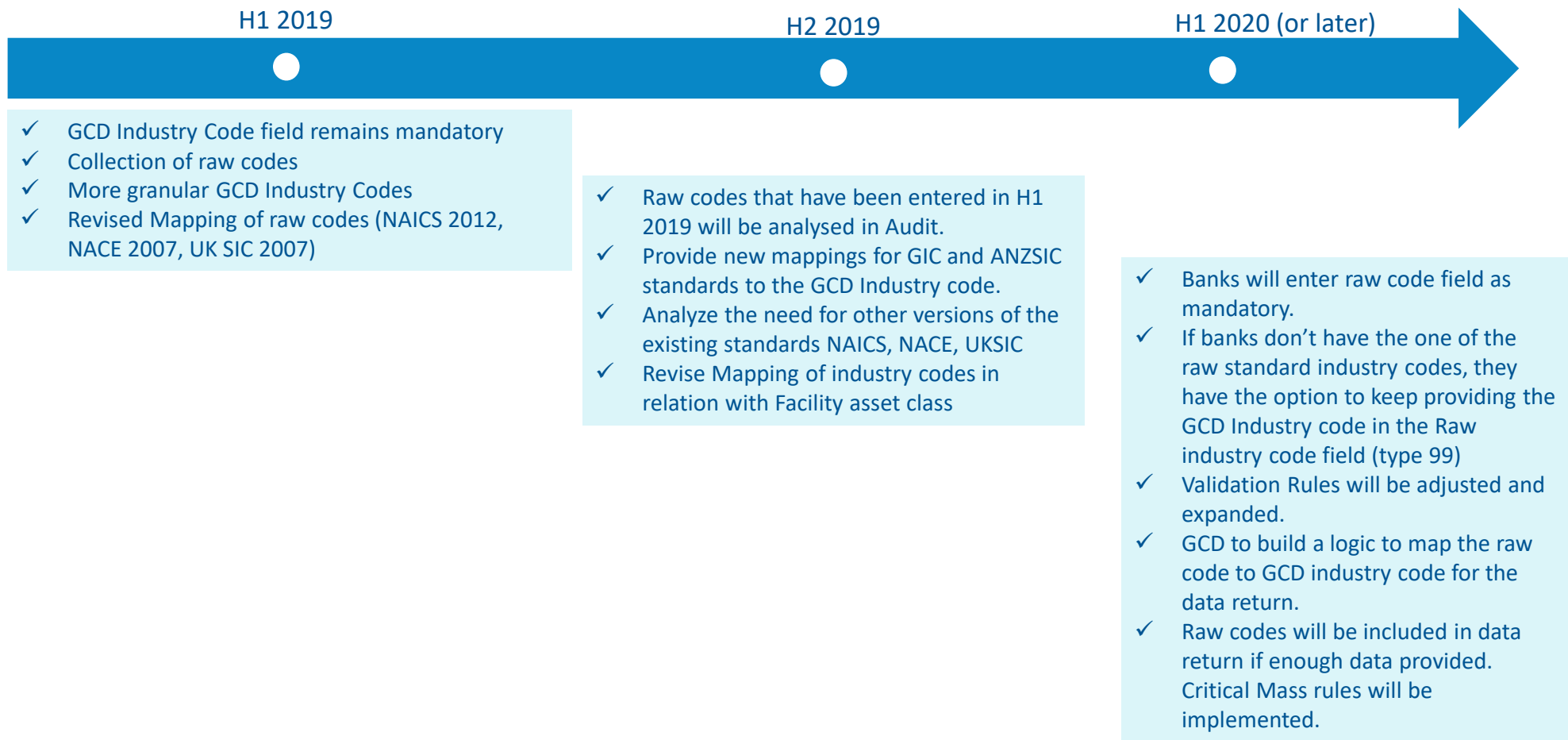
Action Requested

MethCom to be informed on the updates of the road map for collecting and implementing Raw industry code in GCD data model

Background and Status

- In H1 2019 *Raw_Industry_code* has been implemented
 - Methcom has been regularly informed on the status.
- Enhancement and changes on the road map will be shared

What was discussed so far (Timeline approved in h1 2019)



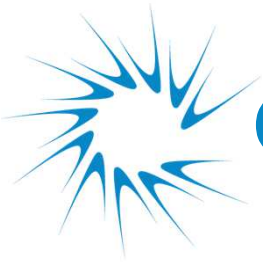
Data assessment and next steps

LGD Platform	
N. of Lenders providing	17
N. Of Entities	13915*

PD Platform	
N. of Lenders providing	3 out of 16
Completion rate	93%

- ❑ **First step:** check weather the Raw industry code provided match with the *Primary_Industry_code*. Are they consistent?
- ❑ **Second step:** GCD to build a logic to map the raw code to GCD industry code for the data return
- ❑ **Third step:** Banks will enter raw code field as mandatory and GCD will assign the GCD Industry code based on step 2.

Item 6



Global Credit Data

by banks for banks

Data Quality

Validation Rules

For information to Methcom Only.

Approved by LGD & EAD Subcommittee during meeting 27th January 2021

LGDS Subcommittee 27th January 2021

For information to Methcom Only.

Approved by LGD & EAD Subcommittee during meeting 27th January 2021

Proposal new Validation Rule H1 2021 – Liquidation of Collateral

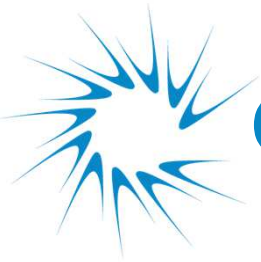
In GCD data model the sale of the collateral should be recorded with the Collateral_Sale_Indicator=1 in the collateral table. The sale should also be reflected in the transaction table with a *Source_of_Payment* 200 (Liquidation of Collateral).

Table	Validation ID	Data Field	Trigger	Message	Type	Correctness / Completeness	Introduced	Amended
Transaction	TRANXXX	Source_Of_Payment	Missing Source_Of_Payment=200 for {Loan_id, Liquidated_Collateral_id} combination where Collateral_Sale_Indicator = 1 for {Loan_ID, Collateral_id} combination at Event_Type 4 or 5	TRANXXX: At least one transaction with Source_Of_Payment = 200 must be provided when there is a Collateral_Sale_Indicator is 1 for (%Loan_id,% %Liquidated_Collateral_ID%) for Event_Type = 4 or 5.	Warning	Correctness	H1 2021	

Proposal: A transaction with Source_of_Payment 200 should exist in the Transaction table when the Collateral is sold (Collateral_Sale_Indicator=1) at Event_type 4 or 5.



Item 7



Global Credit Data

by banks for banks

Documentation improvement

For information to Methcom Only.
Approved by LGD & EAD Subcommittee during meeting 27th January 2021

For information to Methcom Only.

Approved by LGD & EAD Subcommittee during Payment meeting 27th January 2021

Source_of_Payment	Description	Definition
100	Borrower's Cash Flow	Any payment by the obligor.
200	Liquidation of Collateral	Implies the existence of a collateral.
210	Book Value of Collateral	Implies re-possession.
220	Utilisation of Reserves	Implies the existence of Collateral Type 100.
300	Guarantor	Implies the existence of a guarantor.
400	Debt Issuance	The obligor has been granted new loans, of any type and by new lenders.
500	Equity Issuance	The obligor has increased its equity.
700	Sale of Credit	The loan has been sold to another lender.
800	Merger/Acquisition or Sale of Borrower	The loan has been repaid within a global agreement where the obligor has gone under a new management due to a merger or take over.
900	Liquidation of Borrower	The monies come from the liquidator or receiver, without exact knowledge of which assets have been sold.
-1	Other	

Old Descriptions



Source_of_Payment	Description	Definition	Loan Status at Event Type 5	Transaction Type applicable
100	Borrower's Cash Flow	Any payment by the obligor. The source of the cash flow could be normal trading, stock liquidation sale, sale of an asset of the company eg a truck, sale of a subsidiary. If the asset sold has been pledged to the bank as collateral then use source of payment 200 instead. If the source is a refinancing or a new equity then use 400 or 500 instead.	Not 6 and not 9	100 200 299 490
200	Liquidation Sale of Collateral	It requires a collateral connected to the loan. This should be in cases where a borrower sells the collateral voluntarily or where the bank forces the borrower to sell it or where a court orders the sale or where a liquidator or receiver makes the sale.	Not 6 and not 9 and not likely to be 7	100 200 490
210	Repossession of Collateral (Book)	This should only be used in the case where the bank reposses the collateral and then applies a value of that collateral to a reduction or a cancellation of the loan. The bank becomes owner (seizure) post default - the Asset has not been sold. The recorded value is legally accepted by the bank as repayment of the loan. Only applies in certain jurisdictions (e.g. US). Often occurs after repossession of a piece of real estate. Usually only applicable to loans connected to a collateral type 500 real estate or other physical assets, such as ships, aircrafts and leased assets	Not 6 and not 7 and not 9	250 - Recorded Book Value
220	Utilisation of Reserves	The bank has charge over cash reserves (bank accounts of the borrower) then after default the bank can often use these 'reserves' to pay down the loan. This requires the existence of Collateral Type 100.	Not 6 and not 9	100 200 490
300	Guarantor	It requires a guarantor connected to the loan. This should be in cases where a guarantor pays voluntarily or where the bank forces the guarantor to pay or where a court orders the guarantor to pay.	Not 6 and not 9	100 200 490
400	Debt Financing Issuance	The obligor has been granted new loans, of any type from new lenders (refinancing). This can include bond issuance. If the source of cash flow is a new loan from the current lender then this should not be reported as a cash flow.	Not 6 and not 9	100 200 490
500	Equity Financing Issuance	The obligor has obtained cash from sale or issuance of equity in itself or its subsidiaries. This can include debt bond issuance.	Not 6 and not 9	100 200 490
700	Sale of Loan Credit	This could be a sale of an individual non performing loan or as part of a sale of a portfolio of non performing loans. The loan has been sold to another lender or investor or to government sponsored scheme.	5 (Sold Post Default)	100 200 490
800	Merger/Acquisition of Sale-of-Borr	The borrower is sold by its shareholders and the debt is repaid as part of this process. Second possibility is that the company is merged into another company and the debt is taken over by another borrower (a new company, or one of the acquirer's companies). The defaulted loan is repaid and the new good loan is created to another obligor.	3 or 4 only	100 200 490
900	Liquidation of Borrower	The monies come from the liquidator or receiver or bankruptcy trustee. If you know that the monies come from the sale of collateral then use Sale of Collateral (200) instead.	3 or 4 only	100 200 490
-1	Other			

Updated Descriptions



Do we agree with the proposed improvements on the Source of Payment Lookup (Decision) ?

Item 8



GCD Benchmarking Platform H2 2020 Cycle

*Status Update for Methcom
from Dec 15 Subcommittee Meeting*

Chair: Ken Dubien (Bank of Nova Scotia)
GCD Support: Hale Tatar

Name Benchmarking

Dramatic Increase in Participation by Members

Name Benchmarking

Data Returned to participant banks on Nov 20.

Increase: Current number of active participants is now **13** with several more banks interested to join next collection.

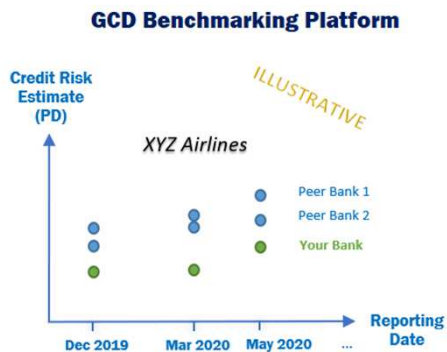
Active Reporting dates: December 2019 onwards. Crisis runs are March, May, July, Aug where banks opt-in.

Orange bar is the potential! (1 or more banks could unlock these names)

Number of names return **increased significantly** since the beginning of the year. From 41 names in June 2019 to **1626** names in December 2019.

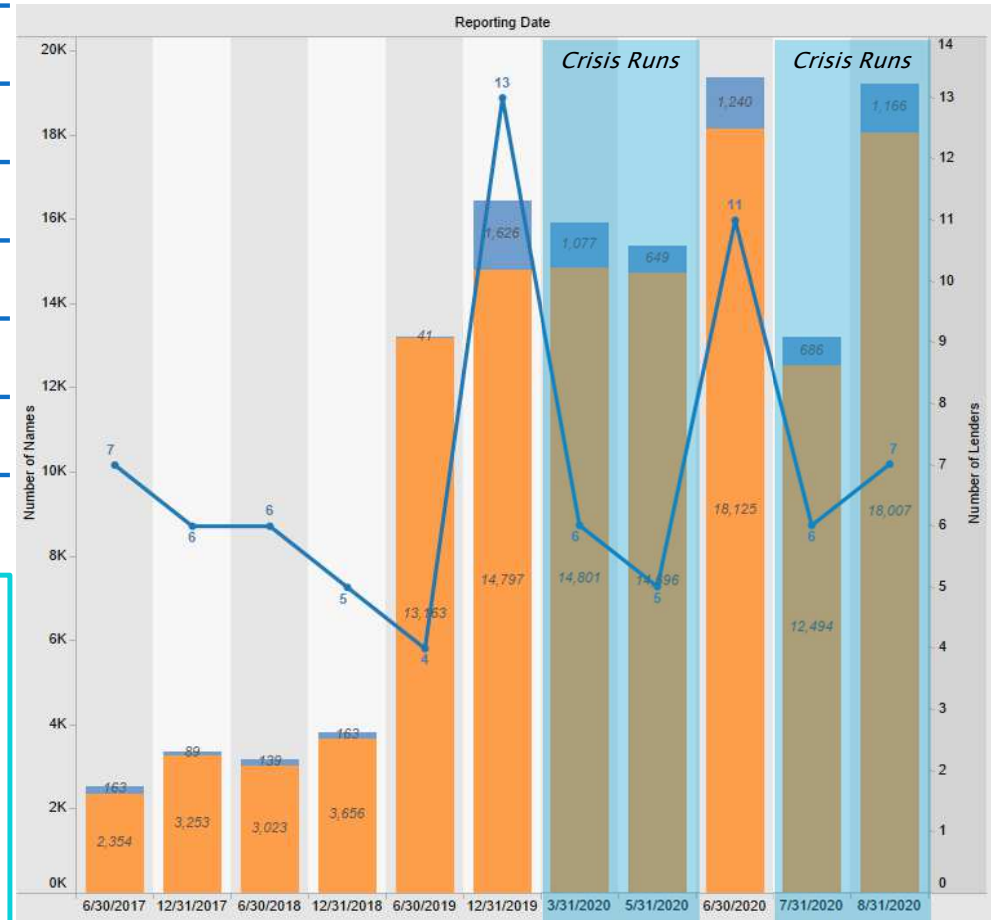
Crisis Benchmarking: More frequent collection due to Covid-19, has increased participation in both number of banks and number of names

Working closely with banks to improve the fuzzy name matching which allows more names to be submitted.



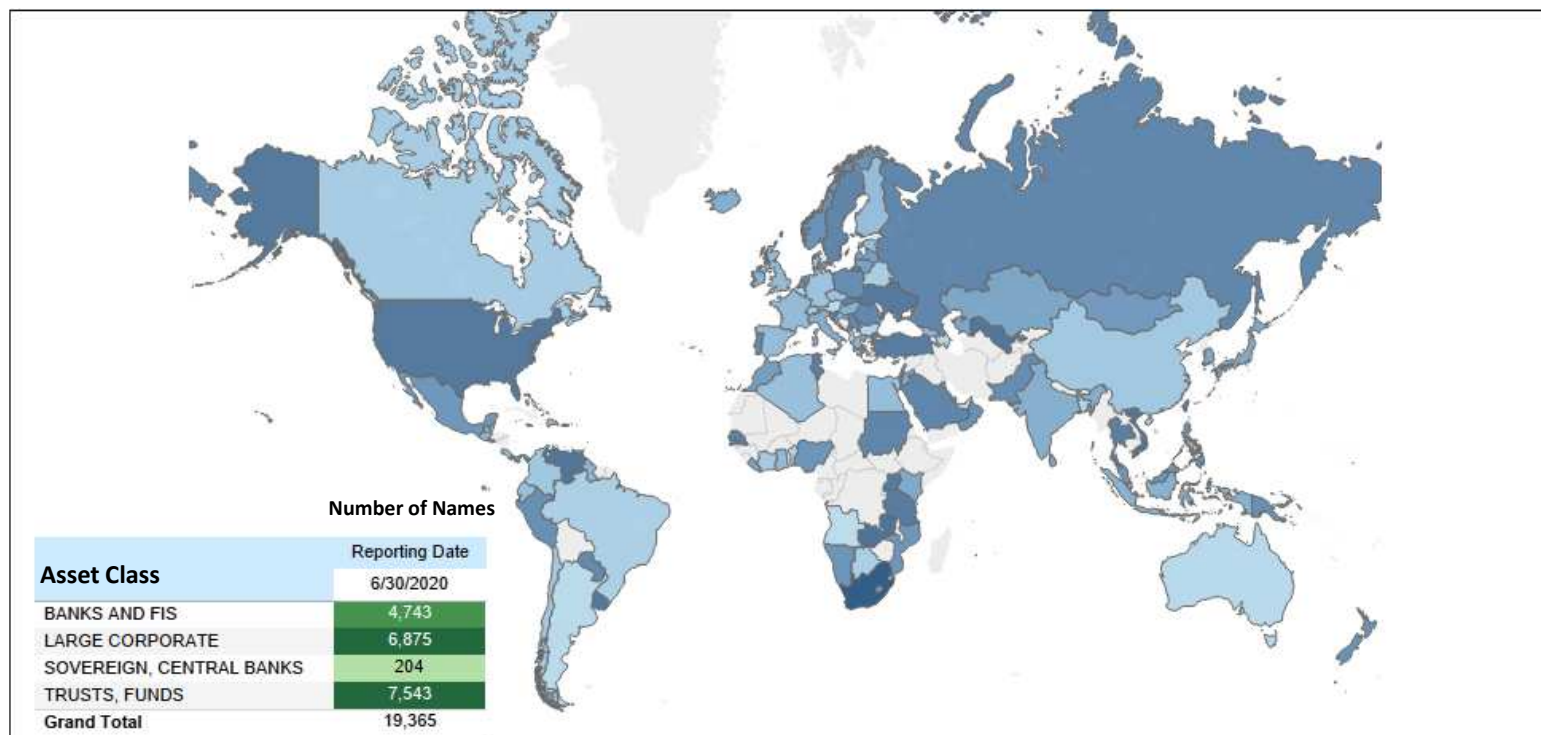
2021 Submission cycle started now:

Snapshots collected in the current run are **September, October, November and December 2020.**



H2 2020 Cycle Overview

Name Benchmarking



Regional focus:
South African regional pilot run was a success and currently kicking off Nordic and US Region

Cluster Benchmarking

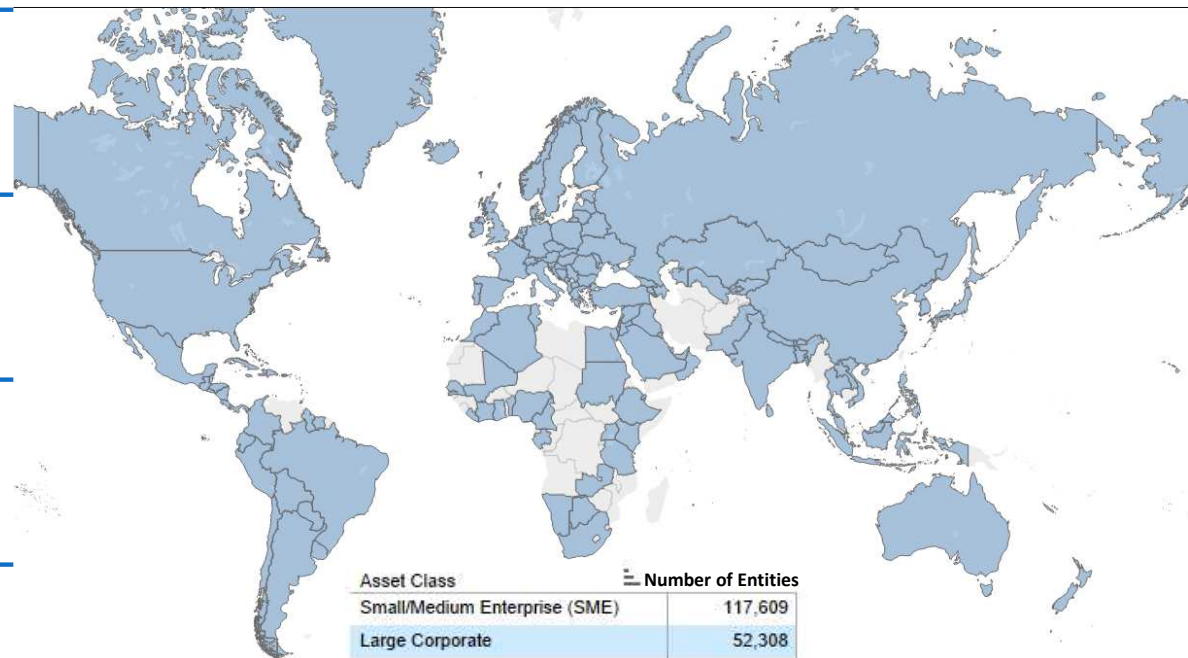
H2 2020 Cycle Overview

Data Returned to participant banks on Dec 4th.

Current number of active participants is **8**, with global data coverage.

Banks can compare estimates for their segments with their data return for December 2019 and June 2020 to see the impact of the Covid-19 pandemic.

Currently cluster data collection runs semi annually.



2021 Submission Planning

Upcoming cycle dates

Banks can submit names for previous RDs

Banks can submit monthly snapshots Sep, Oct, Nov, Dec

Q4 - Dec2020

Q1 - March2021

Q2 - June2021

Q3 - Sept2021

H1/2021

Week	Dates	BP Names	BP Clusters	LGD	PD & Rating	ICC	GCD Conference
2	4/1 - 10/1	CL				S	
3	11/1 - 17/1	CL				S	
4	18/1 - 24/1	CL				S	
5	25/1 - 31/1	CL			PP	S	
6	1/2 - 7/2	S			S	A	
	8/2 - 14/2	S			S	A	
	15/2 - 21/2	D			S	A	
9	22/2 - 28/2	A	S		S	A	
10	1/3 - 7/3	RS	S		S	A	
11	8/3 - 14/3	DA	S	PP	S	A	
12	15/3 - 21/3	DR	S	S	D	RS	
13	22/3 - 28/3	CL	S	S	A	RS	
14	29/3 - 4/4	CL	S	S	A	RS	
15	5/4 - 11/4	CL	D	S	A	DA	
16	12/4 - 18/4	CL	A	S	RS	DA	
17	19/4 - 25/4	CL	A	S	DA	ICC PR	
18	26/4 - 2/5	CL	A	D	DA	ICC PR	
19	3/5 - 9/5	CL	RS	A	DA	ICC PR	
	10/5 - 16/5	S	DA	A	DR	ICC PR	
	17/5 - 23/5	S	DA	A	DR	ICC PR	
	24/5 - 30/5	D	DR	RS		ICC PR	
23	31/5 - 6/6	A	DR	DA			
24	7/6 - 13/6	RS		DA			
25	14/6 - 20/6	DA		DA			
26	21/6 - 27/6	DR		DR			
27	28/6 - 4/7	CL		DR			
28	5/7 - 11/7	CL					
29	12/7 - 18/7	CL					
30	19/7 - 25/7	CL					
31	26/7 - 1/8	CL					

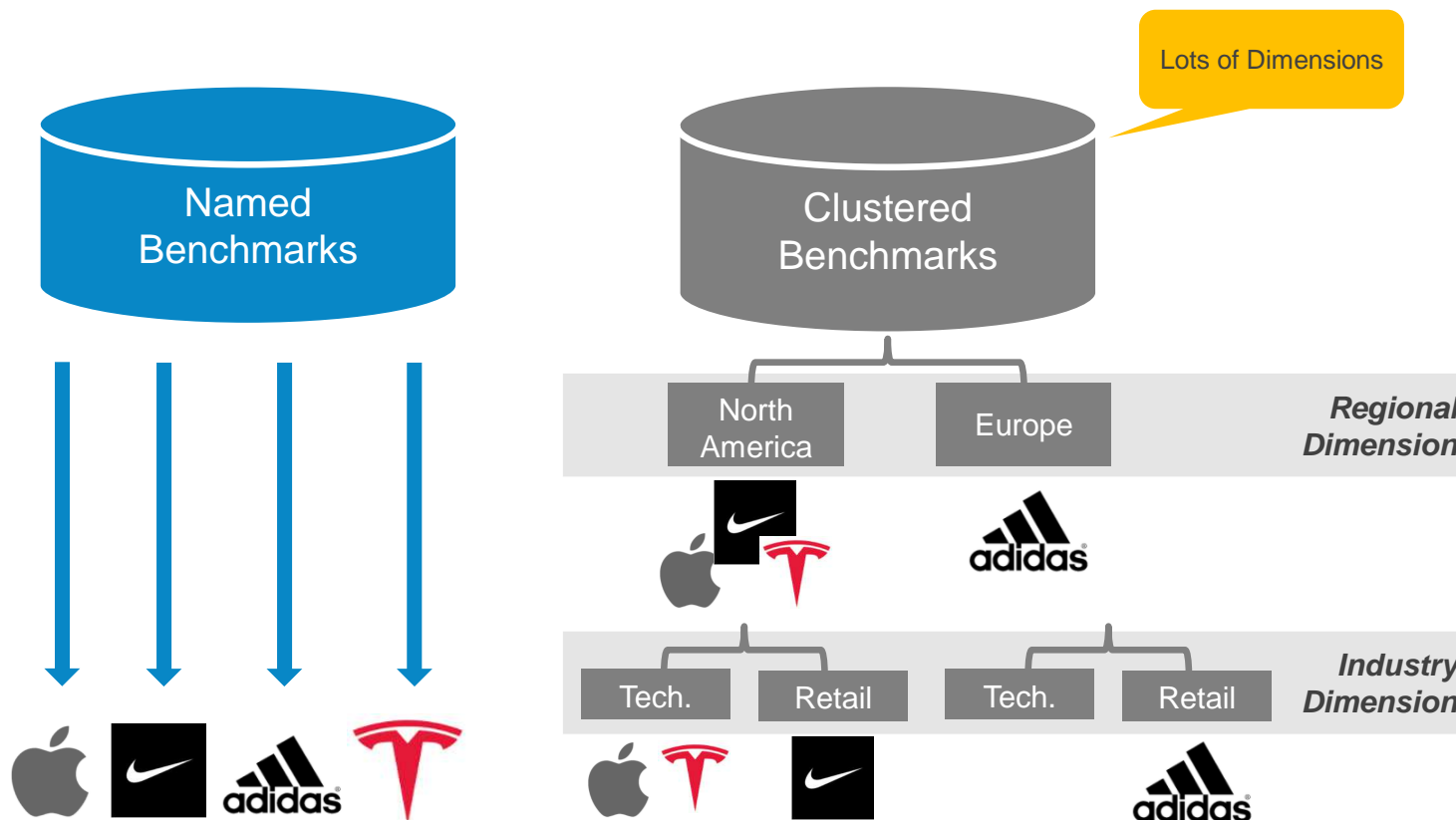
H2/2021

Week	Dates	BP Names	BP Clusters	LGD	PD & Rating
32	2/8 - 8/8	CL			
33	9/8 - 15/8	CL			
34	16/8 - 22/8	CL	S		
35	23/8 - 29/8	S	S	PP	
36	30/8 - 5/9	S	S	S	
	6/9 - 12/9	D	S	S	
	13/9 - 19/9	A	S	S	
	20/9 - 26/9	RS	S	S	
40	27/9 - 3/10	DA	D	S	
41	4/10 - 10/10	DR	A	S	
42	11/10 - 17/10	CL	A	D	
43	18/10 - 24/10	CL	A	A	
44	25/10 - 31/10	S	RS	A	
45	1/11 - 7/11	S	DA	A	
	8/11 - 14/11	D	DA	RS	
	15/11 - 21/11	A	DR	DA	
	22/11 - 28/11	RS	DR	DA	
49	29/11 - 5/12	DA		DA	
50	6/12 - 12/12	DR		DR	
51	13/12 - 19/12	CL		DR	
52	20/12 - 26/12	CL			
1	28/12 - 3/1	CL			
2	4/1 - 10/1	CL			
3	11/1 - 17/1	CL			
4	18/1 - 24/1	CL			
5	25/1 - 31/1	CL			
6	1/2 - 7/2	CL			
7	8/2 - 14/2	CL			
8	15/2 - 21/2	CL			
9	22/2 - 28/2	CL			

PP	Presubmission Package & Put in Production and Release Note of small Enhancement	RS	Revised Submission
S	Submissions (Test or Firm)	DA	Data Aggregation and final DQ checks
D	Firm Submission Deadline	DR	Data and Reports Deliverable
A	Audit & Resubmission	ICC PR	ICC Public Report
CL	Send to GCD the New Name you want to include in central List		

Please keep in mind that the portal is always open for use.

Appendix: Named Benchmarks vs Cluster Benchmarks



What is a Cluster?

Create a cluster – banks benchmark based on creating their very own cluster, using available dimensions to ‘slice-and-dice’ and create their benchmarking Clusters.

Dimensions – Facility Asset Class, Country & Rating are mandatory dimensions. Additional dimensions are optional (financials, etc.).

Appendix: Credit Risk Parameters in the template, 116 in total

Applicable Components	PD	LGD	CCF/EAD
Regulatory or Economic	✓	✓	✓
PiT or TTC	✓	✓	✓
S&P Equivalent	✓		
Post-Default Advances (EAD or LGD)		✓	✓
Seniority		✓	
Rank		✓	
CCF1, CCF2 or CCF3			✓
Term-Loan/Revolving Credit/Contingent Liab.			✓
Issued or Called Amount			✓

Highly granular template – 116 parameter codes

- PD → 6 parameters
- LGD → 48 parameters
- CCF/EAD → 60 parameters
- IFRS9 → 2 parameters