

INTRODUCTORY BANKING



Lecture 8 – Principles of Risk Management

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Key terms of Credit risk - Lecture 06 and Tutorial 06

- Credit risk as a key risk in banking
- Credit risk measurement tools and management
 - Credit rating
 - Credit scoring
 - PD (probability of default)
 - NPL (non-performing loans)
 - LGD (loss given default)
 - EAD
 - Provisioning
 - Models (combining all of this)
 - LTV (loan-to-value), in %
 - DTI (debt-to-income), in number of years
 - DSTI (debt-service-to-total-income), in %
- Credit registers
- Capital requirement quantification – risk weights
- Provisions quantification, IFRS 9

Content

1. Definition of Risk and Risk management
2. Risk categorization and ALM
3. Overview of Credit risk
measurement/management
4. Overview of Market risk & Liquidity
measurement/management – GAP
Analysis



Definition of risk and risk management

Risk is ...

- the degree of uncertainty of future net returns.

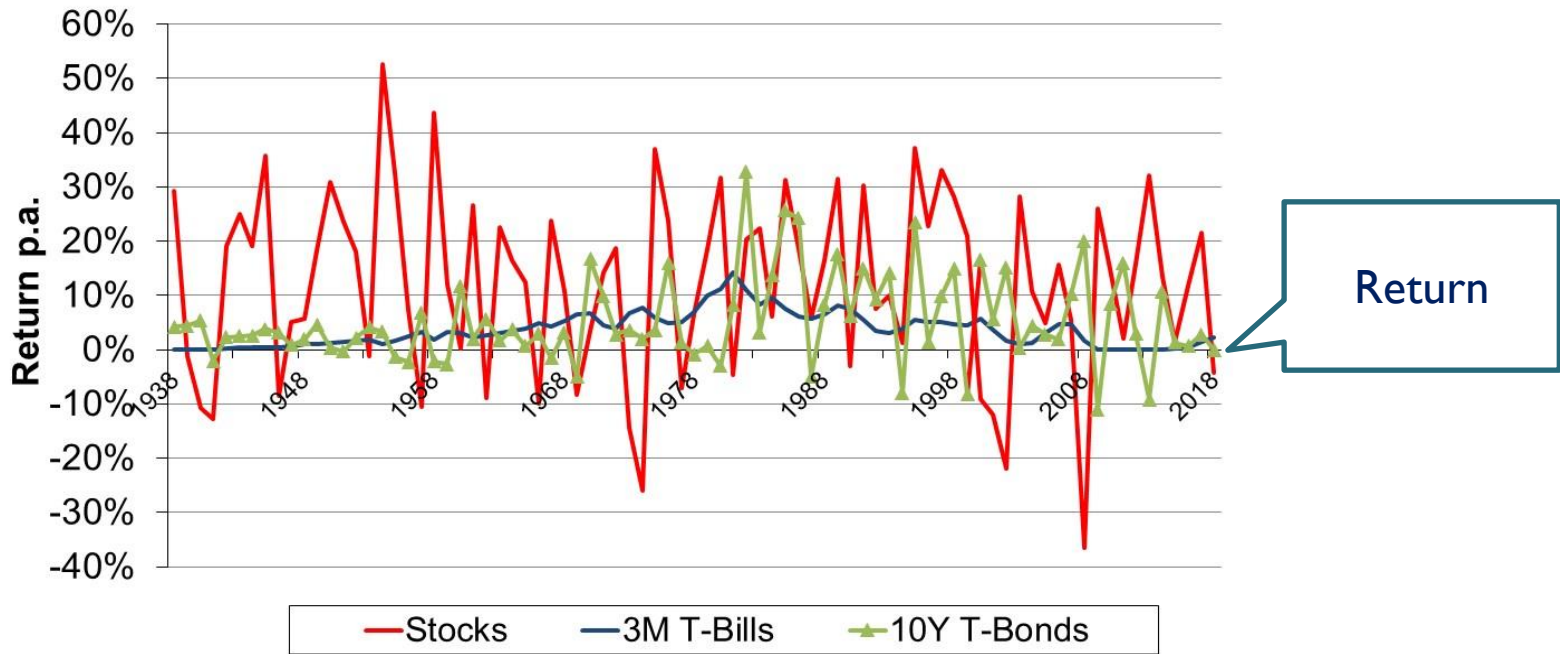
The basic measurement tool is the volatility (standard deviation of price outcomes associated with an underlying asset).

Risk management is ... (different sources)

- Measurement/evaluation and monitoring of risks and, where appropriate, the taking of action to limit the risks undertaken.
- A process involving the identification of the exposures to risk, the establishment of appropriate ranges for exposures, the continuous measurement of these exposures, and their execution.
- Structured asset and liability management as well as the management of off-balance sheet items (ALM). But usually we concentrate on the management of specific risks (specific stage of ALM).

Risk vs return of securities in the 1928 -2018 period

Stocks, T-Bills and T-Bonds Performance in the US in 1938-2018



	<i>Arithmetic Average of Risk Premium</i>	
	Stocks - T. Bills	Stocks - T. Bonds
1928-2018	7.93%	6.26%
Standard Error	2.09%	2.22%
1969-2018	6.34%	4.00%
Standard Error	2.38%	2.71%
2009-2018	9.85%	5.98%
Standard Error	3.71%	5.50%

Risk
(standard error)

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Categorization of risks (besides systemic risk)

Financial risks

- credit risk
- market risk (interest rate risk, FX risk, equity risk, commodity risk)
- liquidity risk

Non-financial risks

- operational
- model
- settlement
- legal
- taxes
- regulation
- political
- reputational.....



Definitions of main risks + how are reflected in the balance sheet

Credit risk

- risk to the bank of losses resulting from the failure of a counterparty to meet its obligations in accordance with the terms of a contract under which the bank has become a creditor of the counterparty,

Credit risk represents 50–80% of all banking risks.

Assets	Liabilities and Equity
Assets sensitive to credit risk (loans provided, securities purchased)	Liabilities (generally not exposed to credit risk)
Assets non-sensitive to credit risk (tangible and non-tangible investments, cash, deposits at the central bank, sovereign debt (?))	
	Equity
Off-balance sheet assets sensitive to credit risk (accepted guarantees)	Off-balance sheet liabilities sensitive to credit risk (guarantees provided)

Market risk

- risks to the bank of losses resulting from changes in prices, exchange rates and interest rates on the financial markets. This is a summary term for interest rate risk, foreign exchange risk, equity risk and other risk associated with movements in market prices,
- Very roughly, 5–20% of all banking risks are accounted for as market risks.

Assets	Liabilities and Equity
Assets sensitive to interest rates, FX movements, stocks	Liabilities sensitive to interest rate and FX movements
Assets non-sensitive to interest rate and FX movements	Liabilities insensitive to interest rate and FX movements
	Equity
Off-balance sheet assets sensitive to market risk	Off-balance sheet liabilities sensitive to market risk

Definitions of main risks + how are reflected in the balance sheet !!!

Operational risk

- risk to the bank of loss resulting from inadequate or failed internal processes, people and systems, or the risk to the bank of loss resulting from external events, including the legal risk. It excludes strategic and reputational risk.

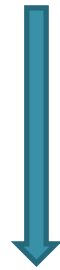
Operational risk represents 5 – 30% of banking risks, depending also on the extent to which it overlaps with the definition of other risks (especially credit risk), examples (frauds, human failures - Barings, SoGe, UBS etc.)

Liquidity risk

- the risk that the bank will lose its ability to meet its financial obligations as they are due, or the bank will not be able to fund its assets,
- „maturity mismatch“
- potential loss due to insufficient market depth.

!! The definitions may overlap; no single set of risks and definitions of risks exists.

Loss distribution of credit, operational and market risk



More difficult to quantify

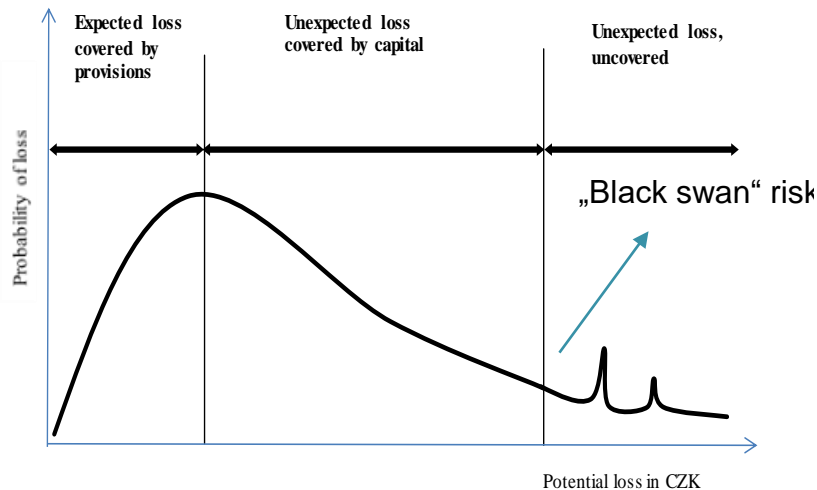
Market risk
Credit risk
Liquidity risk
Operational risk
Legal risk
Political risk
Reputational risk

Easier to quantify

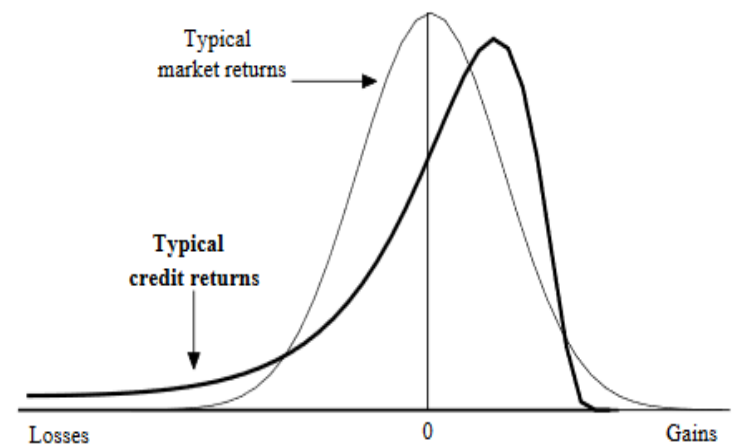


~ Assymetry (credit risk, operational risk)

~ Symetry of losses (market risk)



Comparison of distribution of credit returns and market returns



Market risk – interest rate, equity, FX and commodity risk

Interest rate risk

- of the Trading positions x of the Banking book
- Absolute risk, Relative risk (Yield curve risk, Spread risk) – more on that - Lecture Market risk or the next Tutorial

Equity risk

- Investment in equities of corporate or financial corporations
- (Insignificant positions in the Czech Republic)

FX risk (more on FX risk in the Tutorial)

- Long or short open positions in foreign currencies
- (Limited FX positions in the Czech Republic)

Commodity risk

- Gold, silver and other precious metal
- Energy, crude oil
- Derivatives on commodities
- (Insignificant positions in the Czech Republic)

Market risk - Interest rate risk arises from the Banking book (IRRBB) and Trading Book

The **trading book** refers to assets held by a bank that are available for sale and hence regularly traded.

The **trading book** is required (under Basel II and III) to be marked-to-market on a daily basis.

The **banking book** refers to assets on a bank's balance sheet that are expected to be held to maturity or a longer period.

Any instrument a bank holds for one or more of the following purposes must, when it is first recognized on its books, be designated as a **trading book instrument**:

- (1) short-term resale;
- (2) profiting from short-term price movements;
- (3) locking in arbitrage profits; or
- (4) hedging risks that arise from instruments meeting 1, 2 or 3 above.

General Banking book features	General Trading book features
-Medium and long term	-Short term
-More simple instruments	-More complex instruments
-Higher volumes	-Lower volumes
-Lower cash flows	-Higher cash flows
Valuation approach – at amortised costs and (to limited extent) fair/market value	Valuation approach – fair value/market value (marked-to-market on a daily basis)

Interest rate risk in the banking book (IRRBB)

IRRBB – where does IRRBB arise ?

Assets	Liabilities and Equity
Financial assets held for trading (Trading portfolio)	Liabilities (generally exposed IRRBB - deposits, bonds issued, money market obligations)
Banking book instruments exposed to IRRBB (loans (all types), bond investments)	
* Non-trading financial assets mandatorily at fair value through profit or loss	
* Financial assets at fair value through other comprehensive income	
* Financial assets at amortised cost (debt securities, loans and advances)	
Fixed investment (e.g. property) and other IRRBB insensitive items (e.g. equity investments)	Equity
Off-balance sheet assets sensitive to IRRBB	Off-balance sheet liabilities sensitive to IRRBB

More on the topic in the Tutorial

Risks from the point of view of financial stability

Table II.1

Potential sources of risks to financial stability as perceived by selected national authorities

	IT	ES	PL	AT	DK	CZ	DE	HU	NL	UK	FR	FI	BE	SE	NO	SK
Excessive credit growth	Low	Low	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate	Low	Moderate	Moderate	Moderate	Moderate
Residential property prices	Low	Low	Moderate	Low	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Low	Moderate	High	High	High	High
Household debt sustainability	Low	Low	Low	Low	Low	Low	Low	Low	Moderate	Moderate	Moderate	Moderate	Moderate	High	High	High
Macroeconomic environment	Moderate	Low	Low	Low	Low	Low	Low	Low	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
NFC debt sustainability	Moderate	Low	Low	Low	Low	Low	Low	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate	Moderate	Moderate
Bank loan portfolio quality	Moderate	Low	Low	Low	Low	Low	Moderate	Moderate	Low	Low	Low	Low	Low	Low	Low	Moderate
Pension fund sector stability	Low	Low	Low	Low	Low	Moderate	Low	Low	Moderate	Low	Low	Low	Low	Low	Low	Low
Insurance company sector stability	Low	Moderate	Low	Low	Low	Moderate	Moderate	Low	Moderate	Moderate	Moderate	Low	Low	Low	Low	Moderate
Sovereign risk	High	Moderate	Moderate	Low	Low	Low	Low	Low	Low	Moderate	Moderate	Low	Low	Low	Low	Low
Bank profitability	High	Moderate	Moderate	Moderate	Low	Low	Moderate	Low	Low	Moderate	Moderate	Moderate	Moderate	Low	Low	Moderate

Level of risk: ■ High ■ Moderate ■ Low

Risks in 2019

Source: The relevant countries' latest financial stability reports, ESRB Risk Dashboard, CNB

Note: The assessment is based on a qualitative evaluation of the relevant countries' latest financial stability reports. Where a risk is not mentioned in the report, the assessment is based on the CNB's interpretation of the indicators used in the ESRB Risk Dashboard. The ordering of countries and risks in the table is obtained using a visual contrast-optimising algorithm.

NFC – non-financial corporations

What risk is perceived as the most crucial ?

COVID-19

Risks in 2020



Example I - Risk identification in bank's balance sheet

Interest rate risk

all items in the amount of 10 mio EUR

<i>Asset</i>		<i>Liability</i>	
Loan	6M LIBOR + 1 %	Deposit	6M LIBOR + 0,5 %

<i>Asset</i>		<i>Liability</i>	
Loan	3M LIBOR + 1 %	Deposit	0,70%

<i>Asset</i>		<i>Liability</i>	
Loan	3%	Deposit	3,50%

<i>Asset</i>		<i>Liability</i>	
Loan	3M LIBOR + 1 %	Deposit	6M LIBOR + 0,5 %

FX Risk

CZK reporting entity

<i>Asset</i>		<i>Liability</i>	
EUR Loan	20 mio CZK equivalent	EUR Deposit A	10 mio CZK equivalent
		CZK Deposit B	10 mio CZK

<i>Asset</i>		<i>Liability</i>	
USD Loan	20 mio CZK equivalent	USD Deposit	20 mio CZK equivalent

<i>Asset</i>		<i>Liability</i>	
USD Loan	20 mio CZK equivalent	EUR Deposit	20 mio CZK equivalent

Liquidity Risk

<i>Asset</i>		<i>Liability</i>	
5Y Loan		2Y Term deposit	

<i>Asset</i>		<i>Liability</i>	
1Y Loan		Sight deposit	

<i>Asset</i>		<i>Liability</i>	
1Y Loan		3Y deposit	

Now imagine, all combinations come together  ALM



Example 2 - Risk identification in bank's balance sheet

Identify and discuss the risks to which the bank is exposed to:

As of Dec 31			
Assets	Liabilities and Equity		
Cash	10	Sight deposits	120
Overdrafts	20	1 Y Term deposits (retail customers), fixed rate 2 %	180
Interbank loans (based on PRIBOR)	30	3M Term deposits (large customers), PRIBOR + 1 %	160
Czech Government bills	30	Short term Interbank deposits, denominated in EUR	215
German Government bills, denominated in EUR	15	5Y Bonds issued, USD denominated	20
20Y Government bonds, fixed and floating	25		
6Y Commercial real estate loans (corporates)	280		
20Y Receivables (retail)	320	Equity	80
Equity Investments	10		
Fixed assets	35		
Total	775	Total	775

Credit risk ?

Liquidity risk ?

Market risk ? (Interest rate risk ?, FX risk ?, Equity risk ?)

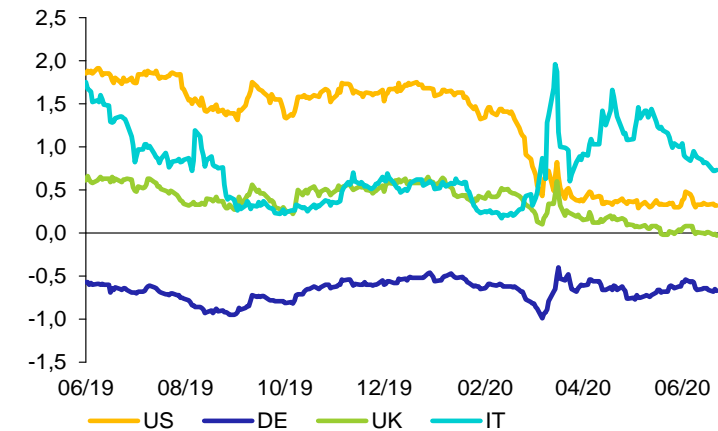
Operational risk ?

?

Market risk – interest rate risk

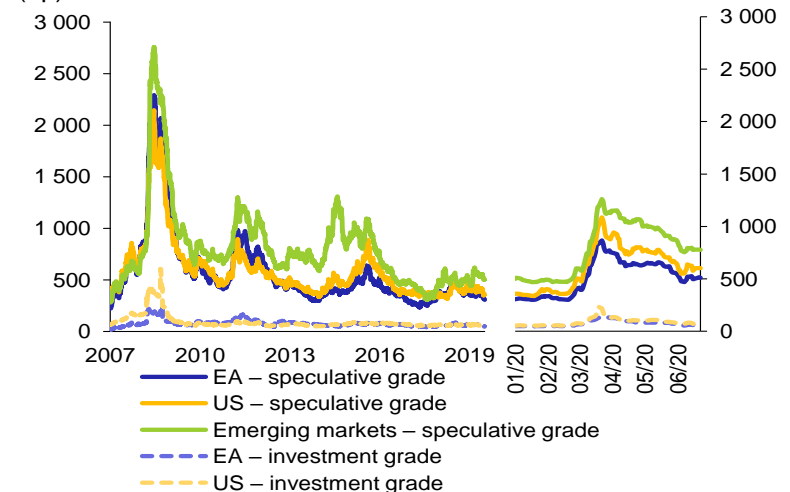
Interest rate risk of the Trading positions – bond yield relationship (all plays a role – absolute i.r. risk, relative i.r. risk)

Chart II.3
Five-year government bond yields for selected countries (%)



Source: Refinitiv

Chart II.2
Credit spreads on corporate bond yields (bp)



Source: Bank of America Merrill Lynch

Note: Credit spread means the yield spread over government bond yields adjusted for any embedded options (option-adjusted spread). Higher values represent a higher risk premium. Speculative grade is a rating of BB+ or lower.

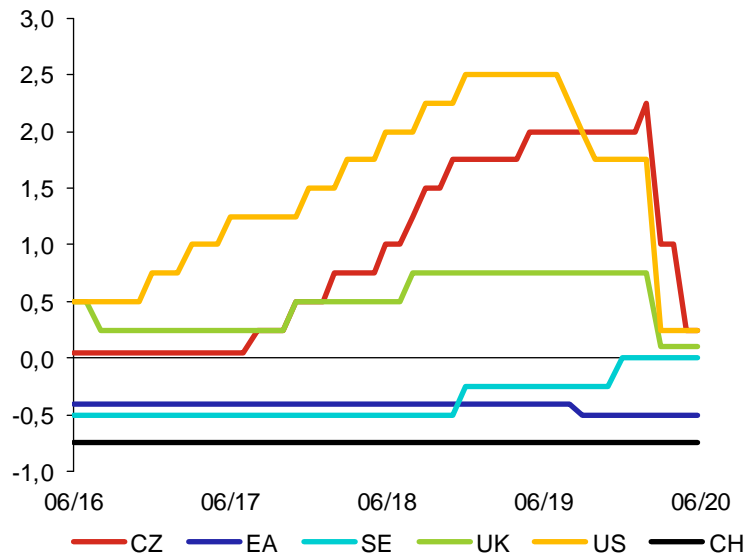
Interest rate risk of the Banking book – modelling potential market value changes due to changes in interest rates or modelling impact on NI („NPV and NI effect“), for the positions held until maturity (incl. loans)

Market risk – (1) interest rate risk (monetary rates (absolute risk)), (2) equity risk

Chart II.8

Main monetary policy rates of selected central banks

(%)



Source: Refinitiv

Note: In the case of EA, the chart shows the deposit rate.

Chart II.1

Key global stock indices

(indices in points)



Source: Refinitiv

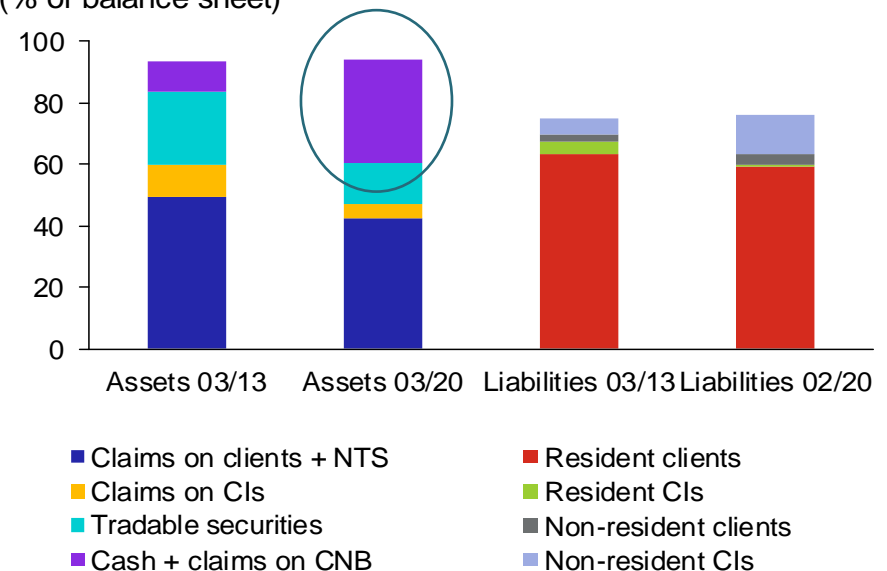
Source: Financial Stability Report 2019/20

Liquidity risk

- The Czech banking sector has above-average liquidity by international comparison and a **significant excess of deposits over loans**
- Sufficient room for credit granting activity
- Liquidity must be assessed by an analysis of **maturity mismatch**
 - Above average LCR (liquidity coverage ratio), more on that Lecture Liquidity



Chart III.15
Selected balance-sheet items of the domestic banking sector
(% of balance sheet)



Source: CNB

Note: CIs = credit institutions. NTS = nontradable securities.

Managing all risks together and at the same time - Asset and liability management

ALM - coordinated management of the balance sheet using various development scenarios of interest rates, liquidity and payments.

ALM is managed through special banking units and/or Assets and Liabilities Committee (ALCO).

The objective of ALM is to assure a banks' **liquidity, solvency and efficiency** concerning:

- **capital and liabilities structure** in term of the management of capital and external sources; most of the external sources come from small depositors, but their influence on a bank is minimal, and on the other hand, the influence of management and big creditors is substantial,
- **assets structure**, their liquidity, return and risks,
- assets and liabilities and off-balance sheet item **relations**.

At this point liquidity risk and insolvency risk shall be mentioned especially because they might be in mutual contradiction when achieving an optimal assets and liabilities structure.

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1. Definition of Risk and Risk management
2. Risk categorization and ALM
3. Overview of Credit risk measurement/management
4. Overview of Market risk & Liquidity measurement/management – GAP Analysis



Credit risk – see L06, T06 on credit risk

Instruments

- **Loans** - Non-standard contracts difficult to transfer to third parties
- **Securities** (Tradable securities) - Standard contract easy to transfer to third parties

Counterparties

- **Corporate** financing (corporate loans, securities)
- **Retail** financing (retail loans, loans to households = individuals + small trades)
 - Consumer credits
 - Mortgages
 - Etc.
- **Government** and **public** financing
- Loans to **financial institutions**
- **Project** financing and other structured financing (of corporate or public projects)
- Etc.

Counterparty credit risk (CCR) – counterparty risk arising from derivative deals (OTC derivatives, repo style transactions)

Measurement tools:

- **Credit rating**
- **Credit scoring**
- **PD (probability of default)**
- **NPL (non-performing loans)**
- **LGD (loss given default)**
- **IFRS 9, provisioning**
- **Models (combining all of this)**
- **LTV (loan-to-value), in %**
- **DTI (debt-to-income), in number of years**
- **DSTI (debt-service-to-total-income), in %**

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Market risk measures

GAP analysis (for measuring interest rate risk, liquidity risk, FX risk via GAPS - open positions)

Volatility

Another instrument for measuring risk is the **sensitivity** to adverse movements in the value of a key variable.

- **First-order** risk measures:
 - Beta (β),
 - Duration (D),
 - Delta (δ)
- **Second-order** risk measures (changes in sensitivities):
Convexity, Gamma, Vega and others

Models (e.g. Value at risk)

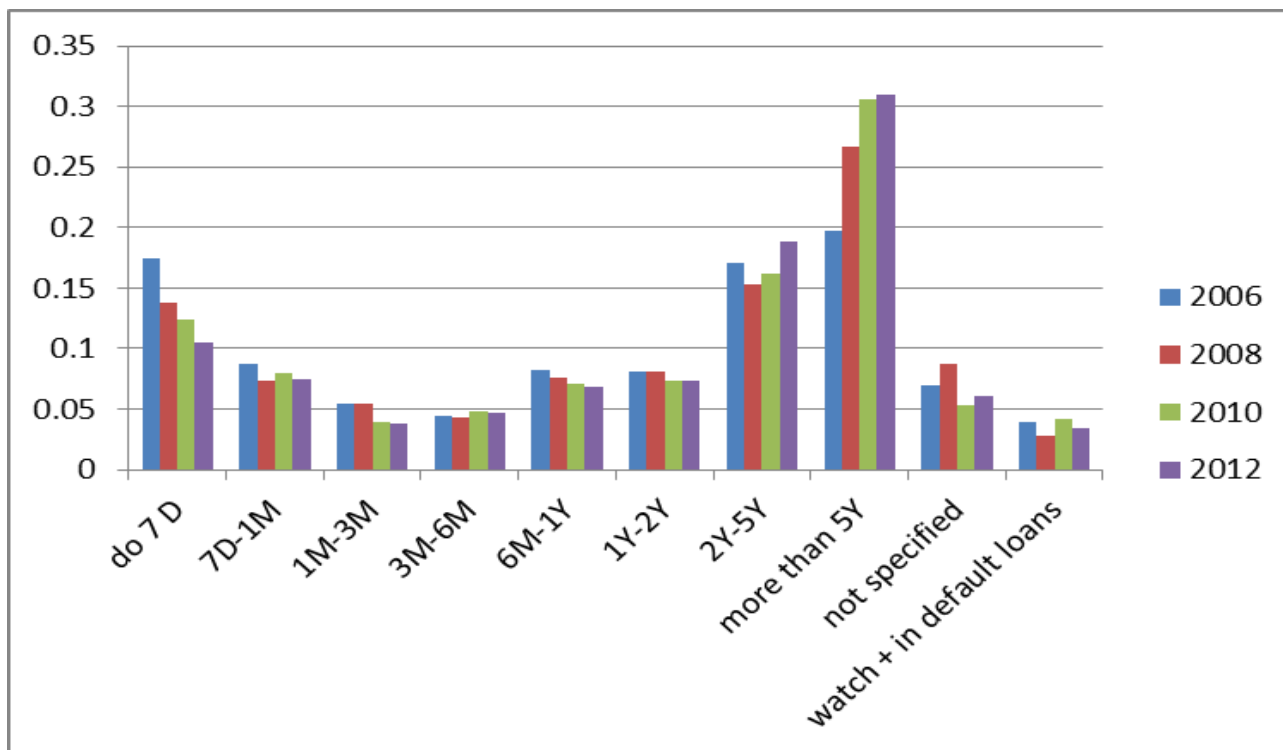
GAP Analysis – Basic risk management model

GAP analysis for measuring liquidity risk - incremental GAP

- An incremental GAP analysis divides **all** institutions' assets and liabilities into different time buckets.
- The periodic (relative) incremental GAP is defined as the difference between assets and liabilities in each time bucket.

GAP Analysis – Basic view on macroliquidity in the CZ (Balance sheet approach)

Time structure of all assets in the Czech banking sector (according to their agreed maturity) \approx average commercial bank

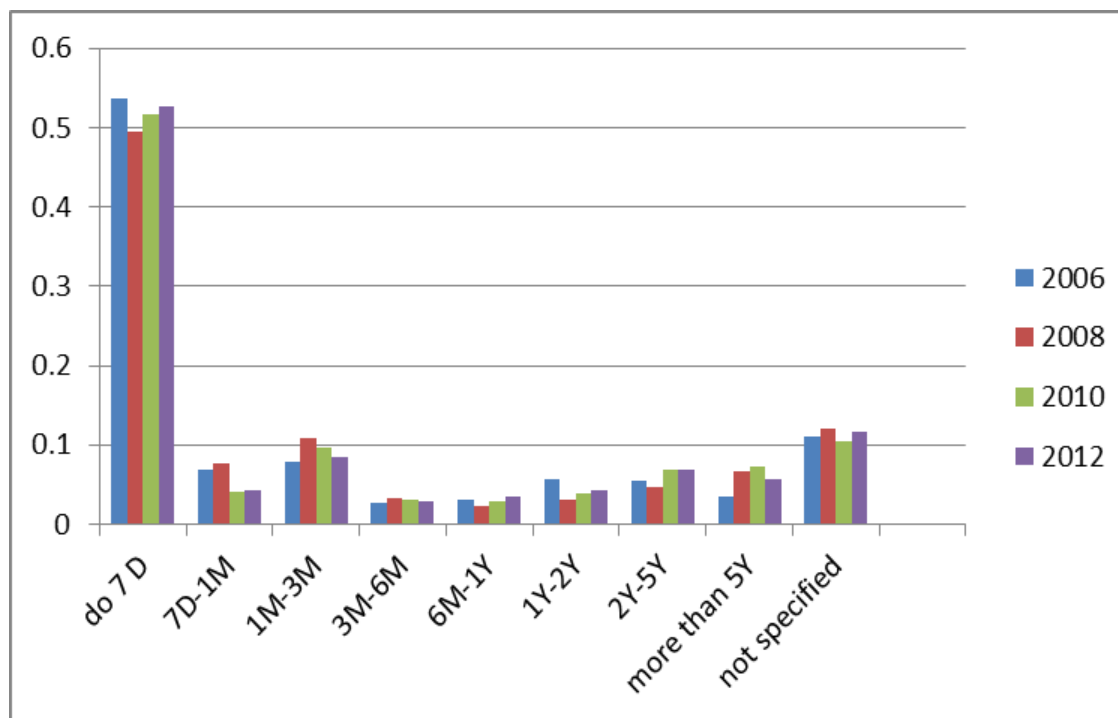


Source: www.cnb.cz

Today (2018 – 2020), the exposure toward CNB would imply higher 7D bucket

GAP Analysis – Basic view on macroliquidity in the CZ (Balance sheet approach)

Time structure of all liabilities in the Czech banking sector (according to their agreed maturity)



Source: www.cnb.cz

Conclusions ?

Sight deposits, prepayment options etc.

Illustration - Liquidity GAP Analysis

GAP Analysis for Interest Rate Risk

Maturity	Interest rate sensitive items							Non-sensitive items
	O/N - 90 days	91-180 days	181-270 days	271-365 days	1-2 years	2-5 years	6-15 years	N/A
Assets								
Cash	80							
Overdrafts	20							
Interbank loans	50	30						
Treasury Bills	20			50				
Government bonds					50			
Company loans					20		10	
Property								80
Total	170	30	0	50	70	0	10	80
Liabilities								
Retail deposits	100		50	30				
Wholesale deposits		40	20	30				
Bonds issued					40	40	20	
Equity								40
Total	100	40	70	60	40	40	20	40
Solution								
Periodical GAP	70	-10	-70	-10	30	-40	-10	40
Cumulative i.r. GAP	70	60	-10	-20	10	-30	-40	
Cumulative GAP								0

* Calculated from short to long term

Note, that if only balance sheet items are assigned to respective time buckets, the liquidity GAP must sum up to 0.

(If expected cash flows included, it does not sum up to 0, as expected cash inflows and cash outflows differ)



Example 3 – Liquidity GAP

Below you see a simplified bank balance, which takes into account the expected cash flows by contractual maturity of each item. Therefore, it also contains expected future payments of interests and coupons, which makes it different from a real bank balance sheet. In this case the expected cash in-flows do not equal the expected cash out-flows. However, this is a more realistic view of a bank's liquidity situation than a simple breakdown of assets and liabilities.

Task is:

- a) calculate GAPs for each time period;
- b) interpret the results calculated;
- c) calculate the cumulative GAP for 6 months and for 1 year;
- d) suggest how we could restructure this breakdown to better reflect the actual maturity of each item.

GAP analysis

Example 3 – Liquidity GAP

According to maturity	Total	Expected Cash Flows							N/A
		O/N - 90 days	91-180 days	181-270 days	271-365 days	1-2 years	2-5 years	6-15 years	
Assets									
Cash	10	10							
Overdrafts	10	10							
Interbank loans (PRIBOR)	55	40	15						
Czech Government bills	90	25	0	2	63				
Government bonds, CZ, fixed and floating	26		1		25				
Receivables (retail)	96		3	4	2	25	2	60	
Receivables (corporates)	280					60	80	20	
Fixed assets	83								83
Total inflows	530	85	19	6	90	85	82	80	83
Liabilities and Equity									
Sight deposits	100								100
Deposits (small customers), fixed rate 2 %	137	80	4	30	5	10	8		
Deposits (large customers), PRIBOR + 1 %	96	6	40	20	30				
Interbank deposits, denominated in EUR	100				20	50	30		
Bonds issued, USD denominated	50							50	
Capital	40								40
Total outflows	523	86	44	50	55	60	38	50	140

Actually, if the bank is profitable, the expected cash inflows should be higher than cash outflows (here $530 > 523$)

Solution to be provided in excel

Example 4 - interest rate risk - floating vs. fixed rates – effect of interest rate change on NII

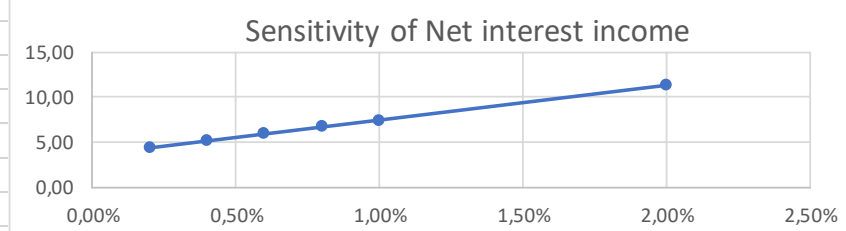
Here see a simplified balance sheet with pricing of assets and liabilities. You see interest income and interest cost over a one-year horizon (-IBOR rate of 0,4%) and recalculation when short term interest rates are changing/rising – sensitivity.

The overall impact is dependent upon the pricing structure of different types of assets and liabilities. Note, that the example is simplified (no differentiation among different short-term rates (e.g. -IBORs (1W, 1M, 3M, 6M....)), only annual frequency of interest rate, etc....

		-IBOR	0,40%					
As of Dec 31								
Assets	Pricing	Asset amount	App. annual i.r. income	Liabilities and Equity	Pricing	Liab. and Equity amount	App. annual i.r. costs	
Cash	0%	80	0	Sight deposits (-IBOR-0,2%)	0,20%	120	0,24	
Overdrafts (-IBOR + 1%)	1,40%	20	0,28	1 Y Term deposits (retail customers), fixed rate 2 %	2,00%	180	3,60	
Interbank loans (based on -IBOR)	0,40%	30	0,12	3M Term deposits (large customers), fixed rate 1,5%	1,50%	160	2,40	
Government bills (fixed 0,1%)	0,1%	30	0,03	Short term EUR deposits	0,30%	215	0,65	
20Y Government bonds, (fixed 3 %)	3%	25	0,75	5Y Bonds issued, USD denominated, fixed 3,3%	3,30%	20	0,66	
6Y Commercial real estate loans (corporates), -IBOR + 2,5'	2,90%	200	5,8					
20Y Receivables (retail), -IBOR +1,9%	2,30%	250	5,75					
Equity Investments		10	0	Equity		80		
Fixed assets		130	0					
Total		775		Total		775		

Annual income			12,73	Annual costs			7,55
Interest rate profit			5,19				

	-IBOR rate	NII
-IBOR rate sensitivity	0,20%	4,43
(with this structure of the balance sheet - short term rates are rising -> profit is	0,40%	5,19
	0,60%	5,95
	0,80%	6,71
	1,00%	7,47
	2,00%	11,27



GAP Analysis – for measuring interest rate risk

GAP analysis for measuring interest rate risk

- The interest rate GAP analysis divides an institution's interest rate sensitive assets (**RSA**) and liabilities (**RSL**) into different time buckets. It measures the risk that arises from interest rate mismatch between the different time buckets.
- The basic methodology is the same as for liquidity GAP analysis, only not the maturity matters in the first place, but REPRICING of the position, on both the asset and liability side (new setting of interest rates)
- Examples ?

Example 5 GAP Analysis – effect of shock on NPV and NII

Illustration of an interest rate change effect on an institution's market value balance sheet and income statement (inspired by Sinkey, 1998):

the basic premise is that a four-year fixed-rate asset of 100 at 3% is funded with a one-year liability of 90 with a floating interest rate and yearly repricing. The shock is simulated as an interest rate increase by 200 basis points (2%) immediately after the asset is funded.

GAP Analysis – effect of shock on NPV and NII

Yield curve:

	<i>1 Y</i>	<i>2 Y</i>	<i>3 Y</i>	<i>4 Y</i>
Spot rate	2%	3%	3.50%	3.80%

Before the shock:

	Spot rate	Discount Factor	Fwd Rates
1	2%	0.9804	
2	3%	0.9426	4.01%
3	3.50%	0.9019	4.51%
4	3.80%	0.8614	4.71%

After the shock:

	Spot rate	Discount Factor	Fwd Rates
1	4.00%	0.9615	
2	5.00%	0.9070	6.01%
3	5.50%	0.8516	6.51%
4	5.80%	0.7981	6.71%

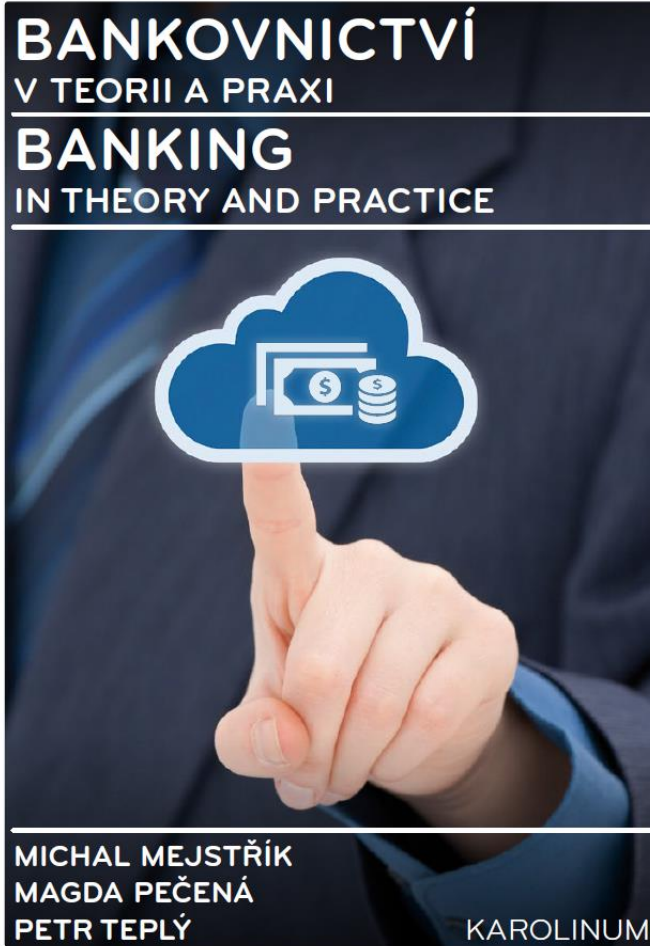
GAP Analysis – effect of shock on NPV and NII

<i>Before the shock - interest income</i>						
	Market value	Book value	Cash flow			
			<i>CF1</i>	<i>CF2</i>	<i>CF3</i>	<i>CF4</i>
Asset	97.20	100	3.0	3.0	3.0	103.0
Liabilities	-90.0	90	-1.8	-3.6	-4.1	-94.2
Capital	7.20	10	1.2	-0.6	-1.1	8.8
<i>Before the shock - fair value</i>						
	Market value	Book value	Cash flow			
			<i>CF1</i>	<i>CF2</i>	<i>CF3</i>	<i>CF4</i>
Asset	97.20	100	3.0	3.0	3.0	103.0
Liabilities	-90.0	90	-91.8			
Capital	7.20	10	-88.8	3.0	3.0	103.0

GAP Analysis – Basic risk management model, example

<i>After the shock - parallel shift + 200 bps, interest income</i>						
	Market value	Book value	Cash flow			
			<i>CF1</i>	<i>CF2</i>	<i>CF3</i>	<i>CF4</i>
Asset	90.36	100	3.0	3.0	3.0	103.0
Liabilities	-88.3	90	-1.8	-5.4	-5.9	-96.0
Capital	2.10	10	1.2	-2.4	-2.9	7.0
<i>After the shock - parallel shift + 200 bps, fair value</i>						
	Market value	Book value	Cash flow			
			<i>CF1</i>	<i>CF2</i>	<i>CF3</i>	<i>CF4</i>
Asset	90.36	100	3.0	3.0	3.0	103.0
Liabilities	-88.3	90	-91.8			
Capital	2.10	10	-88.8	3.0	3.0	103.0

Reading for the this lecture



✓ **Chapter IV – Risk measurement and risk management**