

Michael Blythe Chief Economist

Mick Leonard Chief Risk Officer Financial & Risk Management

Jim Evans Executive General Manager Risk Management & Compliance Wealth Management

David Grafton Executive General Manager Credit Risk Management Retail Banking Services

Paul Riordan 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

# Disclaimer

The material that follows is a presentation of general background information about the Bank's activities current at the date of the presentation, 8 December 2006. It is information given in summary form and does not purport to be complete. It is not intended to be relied upon as advice to investors or potential investors and does not take into account the investment objectives, financial situation or needs of any particular investor. These should be considered, with or without professional advice when deciding if an investment is appropriate.



# 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

#### **Important Information**

This advice has been prepared without considering your objectives, financial situation or needs, and before acting on the advice, you should consider its appropriateness to your circumstances.

Commonwealth Bank of Australia as a provider of investment, borrowing and other financial services undertakes financial transactions with many corporate entities in Australia. This may include any corporate issuer referred to in this report.

If you would like to speak to someone regarding the subject securities described in this report, please contact Commonwealth Australia Securities LLC (the "US Broker-Dealer"), a broker-dealer registered under the U.S. Securities Exchange Act of 1934 (the "Exchange Act") and a member of the National Association of Securities Dealers, Inc. (the "NASD") at 1 (212) 848-9307 or e-mail at rowly.hirst@cba.com.au. This report was prepared, approved, published, and distributed in the USA by Commonwealth Securities Limited (CSL). CSL is not registered as a broker-dealer under the Exchange Act and is not a member of the NASD or any U.S. selfregulatory organization. Please see the analyst certification and disclaimer in the attached Disclosure and Disclaimer Appendix.

Please also view our website at www.research.commsec.com.au for a more detailed disclaimer.

CormonwealthBank



## 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.

CormonwealthBank 🔶	0
	8

# **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.



**Cormonwealth**Bank



×
CommonwealthBank 🔶 10

# **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.

· · · · · · · ·
CormonwealthBank 🥠 12

# **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.

• • • •
CormonwealthBank 🔶 14

# **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.

CommonwealthBank 🔶 16
CormonwealthBank () 16

# Housing

#### **Demography is Destiny**



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

• · · · · · · ·
CormonwealthBank 🔶 18

# **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.

A
CommonwealthBank 🔶 20

# **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.

CommonwealthBank	22

# **Credit Markets**

#### As Good as it Gets?



Background conditions favour a lift in M&A activity.

A
CormonwealthBank 🥠 24

# **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.





#### DISCLOSURE AND DISCLAIMER

The Bank and the US Broker-dealer are affiliates under common control. The Bank and certain of its affiliates transact and seek to transact business with some of the companies covered in the Bank's research reports. As a result, investors should be aware that the Bank may have a conflict of interest that could affect the objectivity of this report. Investors should consider this report as only a single factor in making their investment decisions. This report has been prepared for general circulation and is circulated for general informational purposes only; this report should not be regarded as an offer to sell or as a solicitation of an offer to buy the securities described herein. No part of this report may be reproduced in any manner without the prior written permission of the Bank. With the exception of the disclosures herein relating to the Bank and its affiliates, this research report is based on certain information that The Bank considers to be reliable, but we make no representation that this report is accurate or correct, and it should not be relied upon as such.

This research report is provided with the understanding that the Bank and its affiliates are not acting in a fiduciary capacity. This research report represents the views of the Bank and are subject to change without notice. The securities discussed in this research report may not be eligible for sale in all States or countries, and such securities may not be suitable for all types of investors. Offers and sales of securities discussed in this research report, and the distribution of this report, may be made only in States and countries where such securities are exempt from registration or qualification or have been so registered or qualified for offer and sale, and in accordance with applicable broker-dealer and agent/salesman registration or licensing requirements.

The preparer of this research report is employed by the Bank and is not registered or qualified as a research analyst, representative, or associated person under the rules of the NASD, the New York Stock Exchange, Inc., any other U.S. self-regulatory organization, or the laws, rules or regulations of any State.

#### **Analyst Certification**

Each research analyst primarily responsible for the content of this research report, in whole or in part, certifies that with respect to each security or issuer that the analyst covered in this report: (1) all of the views expressed accurately reflect his or her personal views about those securities or issuers; and (2) no part of his or her compensation was, is, or will be, directly or indirectly, related to the specific recommendations or views expressed by that research analyst in the research report.

The analyst(s) responsible for the preparation of this report may interact with trading desk personnel, sales personnel and other constituencies for the purpose of gathering, synthesizing, and interpreting market information. Employees of the Bank or its affiliates may serve or may have served as officers or directors of the subject company of this report. The compensation of analysts who prepared this report is determined exclusively by research management and senior management (not including investment banking). Analyst compensation is not based on investment banking revenues, however, compensation may relate to the revenues of the Group, as a whole, of which investment banking, sales and trading are a part.

#### **Detailed Disclaimer**

The Commonwealth Bank of Australia ABN 48 123 123 124 AFSL 234945 (the "Bank", and together with its subsidiaries and affiliates, the "Group"), is incorporated in Australia with limited liability.

This report is prepared, approved, published, and distributed solely by the Bank. Entities within the Group and/or their directors, officers and employees (excluding the research analyst[s] preparing this report unless otherwise specifically disclosed) or clients of the Group may have or have had interests or long or short positions in the securities or other financial instruments referred to herein, and may at any time make purchases and/or sales in such interests or securities as principal or agent. Entities within the Group may have or have had a relationship with or may provide or have provided investment banking, capital markets and/or other financial services to the subject companies described in this research report.

#### For U.S. Investors:

Commonwealth Australia Securities LLC ("US broker-dealer") is a wholly owned, but non-guaranteed, subsidiary of the Bank, organized under the laws of the State of Delaware, USA, with limited liability. The US broker-dealer is not authorized to engage in the underwriting of securities and does not make markets or otherwise engage in any trading in the securities of the subject companies described in our research reports. The US broker-dealer is registered under the Exchange Act and is a member of the NASD. The U.S. broker-dealer is the distributor of this research report in the United States and accepts responsibility for its content.

#### For European Investors:

This report is published, approved and distributed in the UK by the Bank. The Bank is registered in England No. BR250 and authorised and regulated in the UK by the Financial Services Authority (FSA). This report does not purport to be a complete statement or summary. For the purposes of the FSA rules, this report and related services are not intended for private customers and are not available to them.

#### General:

This report is published solely for informational purposes and is not to be construed as a solicitation or an offer to buy any securities or related financial instruments. This report is for distribution only under such circumstances as may be permitted by applicable law. This report has been prepared without taking account of the objectives. financial situation or needs of any specific person who may receive this report. Any such person should, before acting on the information in this report, consider the appropriateness of the information, having regard to the specific person's objectives, financial situation and needs and, if necessary, seek appropriate professional or financial advice regarding the appropriateness of investing in any securities or investment strategies discussed in this report. The Bank believes that the information in this report is correct and any opinions, conclusions or recommendations are reasonably held or made, based on the information available at the time of its compilation, but no representation or warranty, either expressed or implied, is made or provided as to accuracy, reliability or completeness of any statement made in this report. Any opinions, conclusions or recommendations of the Bank set forth in this research report are subject to change without notice and may differ or be contrary to the opinions, conclusions or recommendations expressed by other business areas or groups of the Group as a result of using different assumptions and criteria. The analysis contained in this research report is based on numerous assumptions; different assumptions could result in materially different results. The Bank is under no obligation to update or keep current the information contained in this report. None of the entities within the Group or their directors, employees or agents accepts any liability for any loss or damage arising out of the use of all or any part of this report. Any valuations, projections and forecasts contained in this report are based on the number of assumptions and estimates and are subject to contingencies and uncertainties. The inclusion of any such valuations, projections and forecasts in this report should not be regarded as a representation or warranty by or on behalf of the Group or any person or entity within the Group that such valuations, projections and forecasts or their underlying assumptions and estimates will be met or realized. Past performance is not a reliable indicator of future performance. Foreign currency rates of exchange may adversely affect the value, price or income of any security or related investment mentioned in this report. In addition, investors in securities, such as ADRs, whose values are influenced by the currency of the underlying security, effectively assume currency risk.

The Group may engage in transactions in a manner inconsistent with this research report. In the case of certain products, the Bank or one of its affiliates is or may be the only market maker. No inducement has been or will be received by the Group or any person or entity within the Group or the research analyst from the subject of this report or its associates to undertake the research or make the recommendation. The research staff responsible for this report receive a salary and a bonus that is dependent on a number of factors including their performance and the overall financial performance of the Group, including its profits derived from investment banking revenues. The Group provides, or seeks to provide, services to the subject of the report and its associates. This report is not directed to, or intended for distribution to or use by, any person or entity who is a citizen or resident of or located in any locality, state, country or other jurisdiction where such distribution, publication, availability or use would be contrary to law or regulation or which would subject any entity within the Group to any registration or licensing requirement within such jurisdiction. All material presented in this report, unless specifically indicated otherwise, is under copyright to entities within the Group. None of the material, nor its content, nor any copy of it, may be altered in any way, transmitted to, copied or distributed to any other party, without the prior written permission of the Group or the appropriate entity within the Group. Unless otherwise noted, all data is sourced from Australian Bureau of Statistics material. (www.abs.gov.au)



### Mick Leonard Chief Risk Officer



CommonwealthBank 🥠 30

# **Our Risks**



Economic Capital - 30 June 2006



CormonwealthBank 🔶	~~
	32

# Today

- Risk Management as a strategic and operational advantage
- Looking forward
- Maximising investment in Risk Management





CormonwealthBank 🔶 34
CormonwealthBank 🥢 34

# **A Strategic and Operational Advantage**

### **Our strengths:**

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





Our philosophy: Together we deliver optimal customer outcomes







#### **Single Accountability, Shared Oversight**



CormonwealthBank
## How We Manage Risk Bank-Wide



CormonwealthBank 🔶 38	3

# **Looking Forward**





**Cormonwealth**Bank

CormonwealthBank 🔶 40	
CormonwealthBank 🔶 40	
CormonwealthBank 🔶 40	
CormonwealthBank 🕢 40	
CormonwealthBank 🔶 40	
CormonwealthBank 🔶 40	
CommonwealthBank 🥠 40	
CormonwealthBank 🕢 40	
CormonwealthBank 40	
CommonwealthBank 40	
CormonwealthBank 40	
CormonwealthBank 40	
CommonwealthBank 40	
CormonwealthBank 40	
CommonwealthBank 40	
CommonwealthBank 40	
CommonwealthBank 40	
CormonwealthBank 🥠 40	
CormonwealthBank 🥠 40	
CormonwealthBank 🥠 40	
CormonwealthBank 🥠 40	
CormonwealthBank 🥠 40	
<b>Cormonwealth</b> Bank 🥠 40	
	<b>Cormonwealth</b> Bank <b>40</b>

# 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 /	<u>191</u>	<u>176</u>	15
Specific Provision <sup>2</sup>	1,287	1,566	(279)

1. 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.



# **Key Indicators**







· · · · · · · ·
CormonwealthBank 🔶 44

# **Monitoring Sensitivities**

- Retail unsecured
- Automobile Industry, including Auto parts
- Grape growing
- Property developers
- Some aspects of agriculture
- Discretionary Retail





CommonwealthBank 🥠 46
CommonwealthBank () 46

# **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

#### Basel II

- 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).

- 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

CormonwealthBank



# Maximising Investment in Risk

#### Approach:

# **Anti Money Laundering**

AIFRS

Optimise business outcomes versus compliance

#### **Benefits:**

- 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**





CormonwealthBank 🥠 50

# **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





CommonwealthBank 🔶 54

# Today

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





CormonwealthBank 🔶 🕫	56

# **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





CormonwealthBank 🔶 58

# 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.





· · · · · · ·
CormonwealthBank 🔶 👩

# How We Manage Risk

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





· · · · · · · · ·
CormonwealthBank 🔶 62

# **Governance Process**

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





CormonwealthBank 🔶 64

# **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

CommonwealthBank 🔶 66

# **Developing the Solution**

#### Example: Home & Content Insurance

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







# **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



• • • •
CormonwealthBank 🔶 70

# 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**



·	
CommonwealthBank 🔶 72	>
#### **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



CommonwealthBank 🔶 76

## Today

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





***
CommonwealthBank 🥠 78

## 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



CommonwealthBank 🔶 80

## **Centre of Excellence**

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



#### Leveraging capabilities across the Bank



• • • •
CormonwealthBank 🔶 82

#### Credit Portfolio: Results from Improved Capability – Personal Loans



#### **Increased quality of new business**

<b>_</b>
CommonwealthBank 🔶 84

#### **Credit Cards - Recent Improvements**



## Scorecards implemented plus new decisioning software driving arrears and loss performance

CormonwealthBank

#### Home Loans - In Great Shape



#### Losses at historic lows, arrears flat





· · · · · ·

## Home Loans - Dispelling Two Myths

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



CormonwealthBank 📀 90	
CommonwealthBank 📀 20	
CommonwealthBank 📀 90	
CommonwealthBank 📀 90	
CommonwealthBank 🥠 90	
CormonwealthBank 📀 90	
CormonwealthBank 🧑 90	
CormonwealthBank 📀 90	
CormonwealthBank 🥠 90	
CormonwealthBank 📀 90	
CormonwealthBank 🥠 90	
CormonwealthBank 🕢 90	
CormonwealthBank 🥠 90	
CormonwealthBank 🥠 90	
CormonwealthBank 🥠 90	
CommonwealthBank 90	
CommonwealthBank 🥠 90	
CormonwealthBank 🥠 90	 
CormonwealthBank 🥠 90	
CormonwealthBank 🔶 90	
CormonwealthBank 🥠 90	
CormonwealthBank 🥠 90	
Some and the second sec	

## Home Loans - Dispelling Two Myths

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



**Quality accreditation program working well** 

_	
CommonwealthBank 🔶	92

## 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



CormonwealthBank 🥠 94

### Home Loan Portfolio – Stress Tested

#### Market Value Stress

	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



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

Note:

- 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

CommonwealthBank 🥠 96

# 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



• • • •

### **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** 





<b>Cormonwealth</b> Bank / 100

#### **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



CormonwealthBank / 104

## Today

- Governance & Execution
- Poachers turned Gamekeepers
- Key Metrics









#### **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		

#### **Key Principles**

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




# **Key Principles**

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

#### Accountability, Transparency & No Surprises



· · · · · · · ·
CormonwealthBank 🥠 110

# **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**



CommonwealthBank 🔶 112

## **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



· · · · · · ·
CormonwealthBank 🔶 114

## **Key Market Risk Metrics**



#### Sources:

 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 CormonwealthBank



<sup>1.</sup> S&P report entitled 'Lifting the Lid on Traded Market Risk' published 31-Oct-2006

CormonwealthBank 116	
CommonwealthBank 🔶 116	
CommonwealthBank 116	
CormonwealthBank 116	
CommonwealthBank 116	
CormonwealthBank 116	
CormonwealthBank 116	
CommonwealthBank 116	
CommonwealthBank 116	
CommonwealthBank 116	
CormonwealthBank 116	
CommonwealthBank 116	
CommonwealthBank 116	
CormonwealthBank 116	
CormonwealthBank 116	
CommonwealthBank 116	
CormonwealthBank 116	
CormonwealthBank 116	
CormonwealthBank 116	
CommonwealthBank 116	
CommonwealthBank 116	
CommonwealthBank 116	
CormonwealthBank 🔶 116	
CommonwealthBank 🔶 116	
CormonwealthBank 🔶 116	
CormonwealthBank 🔶 116	
CommonwealthBank 🥠 116	
CommonwealthBank 🥠 116	
	Commonwealth Bank () 116

# **Key Market Risk Metrics**





A
CommonwealthBank 🔶 118

## **Key Market Risk Metrics**



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

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



CommonwealthBank () 120

## **Key Market Risk Metrics**



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

• 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.



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

CommonwealthBank 🔶 122

# **Snapshot - Key Market Risk Metrics**



CormonwealthBank

CommonwealthBank 🔶 124
CommonwealthBank ( ) 124

# **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** 





CormonwealthBank 🔶 126

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







CormonwealthBank 128

## **Panel Questions**



Michael Blythe



Mick Leonard



Jim Evans



David Grafton



Paul Riordan

