

IFRS 9 – Comply and Compete

Improving credit decisions across the lifecycle

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Executive Summary – Why Comply and Compete?

- IFRS 9 moves impairment accounting from an incurred to **expected loss basis**
- All accounts will require provisions based on “Expected Credit Losses” over at least the next 12 months – deteriorated accounts over their remaining lifetime
- Compliance with the new standard is usually required by January 2018
- The change **will affect the financial impact of daily decision strategies**, including but not limited to:
 - Originations / pricing / product structure
 - Customer management (especially line management)
 - Collections / recoveries
- Organisations who can plan for and mitigate these impacts will have an advantage over those who focus only on compliance – **“Comply and Compete”**

Stage Classification Requirements

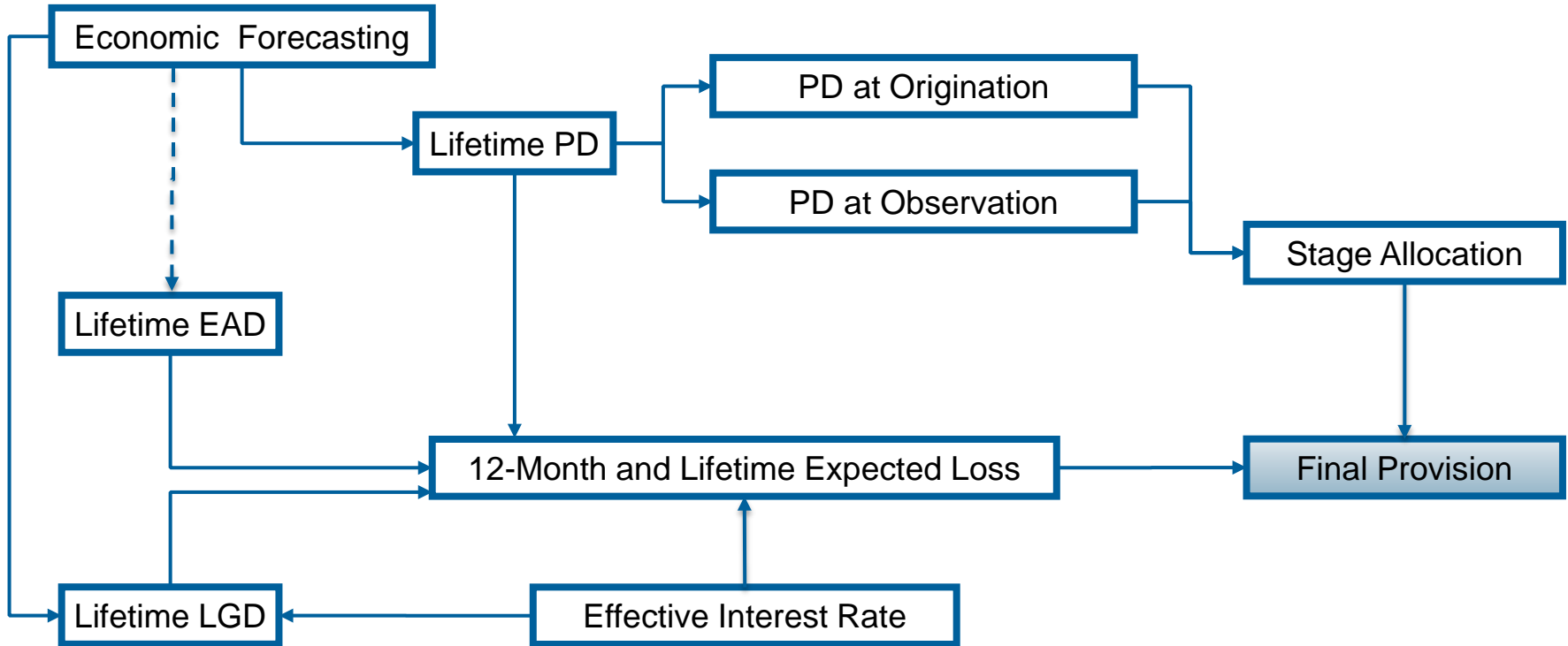
All accounts are segmented into “stages” based on credit risk

	Stage 1	Stage 2	Stage 3
Inclusion criteria	No significant increase in credit risk since initial recognition / low risk	Significant increase in credit risk since initial recognition	Default (credit impaired)
“Rebuttable presumption”		30 days past due	90 days past due
IFRS 9 Basis for Provision	12-month expected credit losses	Lifetime expected credit losses	
Typical IAS 39 Basis for Provision	No provision or minimal general provision	General provision for non-delinquent accounts, else driven by “outcome period”	Outcome period for 90+ non-charged off accounts, else similar to IFRS 9 approach

Credit risk deterioration since initial recognition 

IFRS 9 High Level Analytic Schematic

Numerous models (each with their own useful outputs) combine to produce IFRS 9 provisions.



Linking Expected Credit Loss drivers to business decision areas

PD	EAD	LGD	Lifetime	Stage
<ul style="list-style-type: none">• Underwriting• High Risk Account Management• Collections	<ul style="list-style-type: none">• Initial line• Credit line increases / decreases• Authorisations• Charge vs credit cards	<ul style="list-style-type: none">• Recoveries• Settlements• Debt sales• Collateral values	<ul style="list-style-type: none">• Product tenor• 'Encouraged attrition'	<ul style="list-style-type: none">• High(er) Risk Account Management• Collections• Mitigants to economic conditions

Expected Credit Loss

Profitability / Returns

Sensitivity to Stress

Focus on EAD: Line management

PD

- Underwriting
- High Risk Account Management
- Collections

EAD

- Initial line
- Credit line increases / decreases
- Authorizations
- Charge vs credit cards

Unused credit line bears a cost under IFRS 9
...so card issuers may choose to switch to a “low and grow” strategy
...but this may reduce revenue potential
...and create “adverse selection”
...and a negative customer experience

Focus on Stage: High(er) Risk Account Management

PD

- Underwriting
- High Risk Account Management
- Collections

Preventing movement into Stage 2 is key
...but accounts may move before they are even delinquent
...and they may not be your highest risk accounts
...so 'Pre-Pre-Delinquency' and 'High(er) Risk Account Management' tactics are now needed

Stage

- High(er) Risk Account Management
- Collections
- Mitigants to economic conditions

Thank You

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