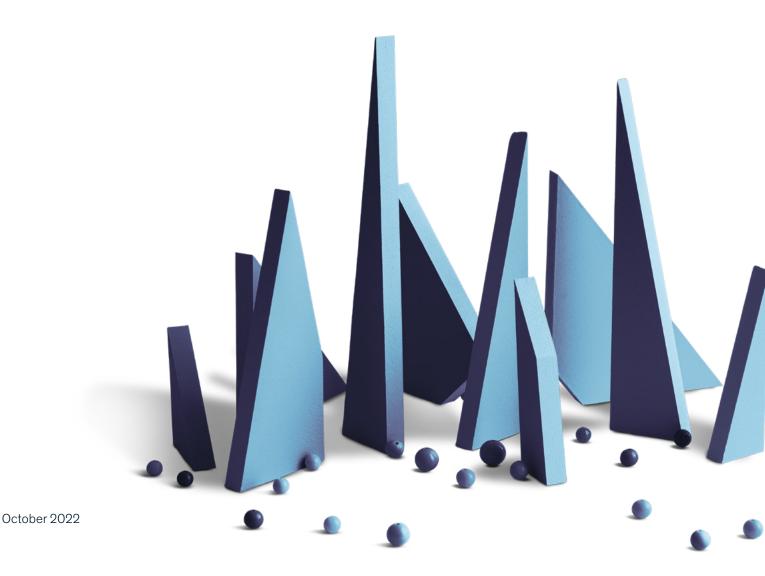




Data and Analytics Innovations to Address Emerging Challenges in Credit Portfolio Management



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The IACPM is an industry association established to further the practice of credit exposure management by providing an active forum for its member institutions to exchange ideas on topics of common interest. The Association represents its members before regulatoryand administrative bodies in the US and internationally, holds bi-annual conferences and regional meetings, conducts research on the credit portfolio management field, and works with other organizations on issues of mutual interest relating to the measurement and management of portfolio risk. Currently, there are over 135 financial institutions based in 29 countries that are members of the IACPM. More information is available at: www.iacpm.org.

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Financial institutions have made significant progress in using new data and techniques for credit portfolio management

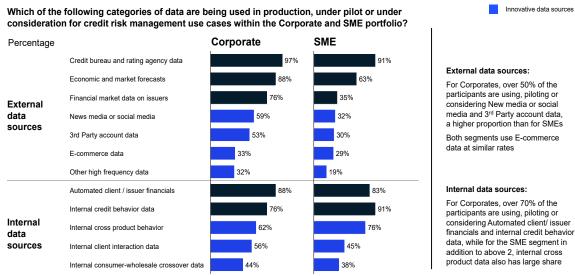
A survey of financial institutions shows firms made significant progress in using new data and techniques for credit portfolio management, but that challenges remain around technology, talent, and integration of new use cases like climate/ESG risk. In recent years, many financial institutions have increased their adoption of data and new technologies to manage credit portfolios. McKinsey and the International Association of Credit Portfolio Managers (IACPM) surveyed 44 financial institutions globally on latest developments in data and analytics for credit portfolio management. The objectives of the survey were to understand the use of traditional and alternative data sources for credit risk information, how financial institutions use analytical approaches across portfolio segments, and to inform the path forward to incorporate next-generation data and analytics across Small and Medium Enterprises (SME), Corporate and Commercial Real Estate (CRE) portfolios.

More than 60% of respondents said that in the past two years they have increased their use of new types of data and deployment of advanced analytical techniques like machine learning for advanced credit portfolio management. An even larger portion of respondents (>75%) expect these trends to continue over the next two years.

As they look to deploy new analytics, companies are obtaining data from sources like automated client financials, internal credit behavior data and cross-product data from internal sources, credit bureau, economic forecasts and news data from external providers. This includes alternative data as well, for example, in the corporate portfolio, more than half of respondents are currently using, piloting, or considering news media, social media, or 3rd party account data. Relative to these sources, fewer banks are using internal cross-portfolio data on consumer-towholesale cross-over accounts, with 44% banks evaluating whether to use this for their corporate portfolio and 38% for their SME portfolio.

Exhibit 1

Innovative external data sources are more used for Corporate segment while SME segment uses more innovative internal data sources



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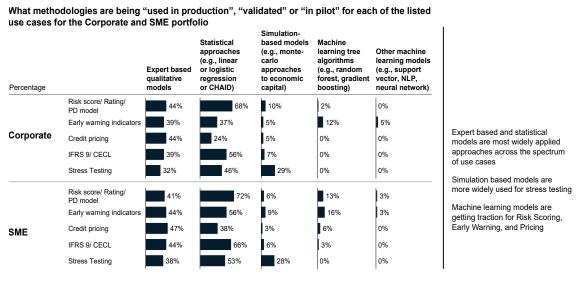
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Innovative data sources

Given segment characteristics, implementation of data intensive, new techniques like machine learning are focused on specific asset classes and specific use cases. Adoption of machine learning models is higher in SME segments than large corporates for a good reason. In SME portfolios these models have found their use in credit scoring, early warning signal development, and credit pricing. In corporate asset classes, however, their usage is largely confined to early warning indicator development.

Exhibit 2

Machine learning models are primarily gaining traction for Risk Scoring of SMEs and Early Warning across the board



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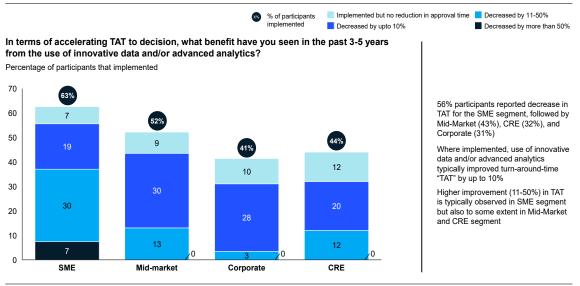
Banks that have fully automated decisions for a majority of the portfolio (>50%) are still relatively rare (~11% for SME portfolios and ~4% for mid-market).

However – specifically for SME portfolios ~30% of respondents reported that they have automated > 30% of their decisions. In addition, in the SME space, respondents report a significant benefit in turnaround time (TAT), with 37% participants reporting a > 10% decrease in TAT.

The benefits of new data and analytics in mid-market, corporate and CRE space has not translated to reduction in turnaround time to such an extent - Only 13%, 3%, and 12% of banks that have automated some of their credit decisions across mid-market, corporate, and CRE portfolios respectively have seen >10% decrease in turnaround time.

Exhibit 3

Where implemented, use of innovative data and/or advanced analytics significantly improved turn-around-time for SMEs



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At the same time, the deployment of machine learning and other analytical techniques has brought several challenges to the forefront. Survey respondents noted various barriers to increased adoption of innovative data solutions and advanced analytical methods in credit portfolio management. This includes data quality assessment, talent availability, and difficulty in validating and explaining new techniques.

Exhibit 4

Data quality assessment and talent management are the top challenges for use of both advanced analytics and innovative data solution

Currently, what are the major challenges faced by your firm that constrain the use of innovative data or advanced analytics (e.g., machine learning and AI)?

	Top 3 challenges for use of innovative data solutions	Top 3 challenges for use of advanced analytics solutions
Data Quality	63	42
Percentage Resources	42	49
Cost of data	30	14
Skepticism/Probability	28	26
Regulatory	28	26
Validation difficulty	19	40
Unmet expectations	14	9
Ability to explain	14	42
Risk concerns	12	7
Other	2	2
Fragmentation	2	5

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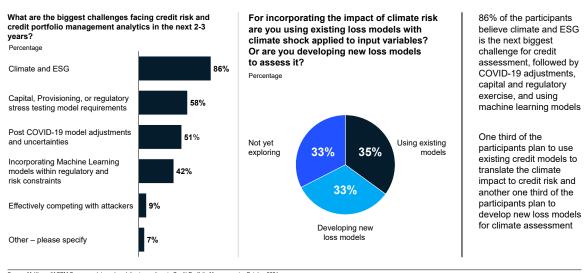
Climate and ESG Risks are emerging as the next biggest Challenge for Credit Portfolio Management

Every survey participant was asked about the biggest challenges facing credit risk and portfolio management analytics in the next two to three years. Notable challenges included capital, provisioning, or regulatory stress testing model requirements (58%), challenges posed by post-COVID-19 model uncertainties (51%) and incorporating machine learning models within regulatory and risk constraints (42%).

However, an overwhelming majority (86%) cited climate risk and ESG as the next big challenge.

Exhibit 5

86% of the participants believe that Climate and ESG is the next biggest challenge for credit assessment



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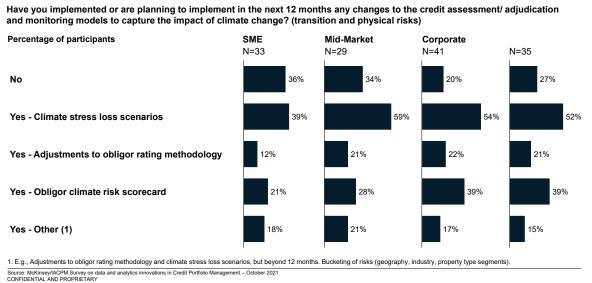
ESG risks are comprised of environmental risks arising from operations and consumption of the output (i.e., services, products) of the organization, social risks arising from how the organization treats people, including employees, customers, and the communities in which it operates, and governance risks arising from poor practices in the organization's interactions with its shareholders, board, and management. These risk factors may have a positive or negative impact on the financial performance or solvency of an entity, sovereign or individual.

Within this overall taxonomy, climate risk falls within the category of environmental risk, and is associated with both direct and indirect impact of physical hazards associated with climate change (e.g., both direct damages caused by hazards like flood/wildfire/hurricane, potential increase in insurance premium in expectation of increased severity of such hazards, and impact on living standards in a community due to increased frequency of such hazards) and the policy, technology and regulatory risk inherent in transitioning away from an economy overly reliant on Green House Gas (GHG) producing activities.

Many financial institutions are now assessing the exposure of their portfolio to climate risk, either due to regulatory requirement, or to test the hypotheses that hurricanes, floods, blizzards, tornados, wildfires, and other natural hazards can inflict billions of damages across loan portfolios in any given year.

Exhibit 6

> 50% of participants have implemented/or are planning to implement climate stress loss analyses in mid-market, corporate, or CRE space



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Banks that have started climate stress testing are now considering whether to build new credit models or, to tailor existing ones for stress testing. Respondents were evenly split into thirds, saying they are developing new loss models, using current models, or are not yet exploring. In addition, analyses on climate stress loss scenarios were more concentrated on mid-market, corporate, and CRE portfolios (>50% of banks for each), with fewer banks (<40%) conducting these analyses on SME portfolios.

EMEA institutions are further advanced in developing internal models to assess climate risk with majority developing models internally or subscribing to vendor models. North American institutions are in the middle and APAC respondents are the least advanced,

Addressing Climate Risk will require a coherent framework

Our survey indicates that portfolio managers have only recently started to consider how climate and ESG risks affect risk identification and risk measurement, including obligor credit ratings. They now need new tools and processes for climate stress loss analyses, climate scenario analyses, and need to evaluate how climate risk assessment can be integrated with existing credit processes.

Based on discussions with survey participants as well as our extensive work with banks, there are several important factors to consider about the material impacts of climate risk on credit:

Climate Risk is typically concentrated in "pockets"

We found both physical and transition risks lie in very targeted areas of the portfolio. To identify the pockets with a high concentration of climate risk impact, financial institutions need to perform a detailed heatmapping to focus their efforts on prioritized hazards for each of the high-risk portfolios. For example, it is commonly observed that most of the credit impact (~70-80% of incremental impact) for real estate related asset classes come from 10-20% of the obligors in the portfolio. This understanding is also reflected in the priorities identified by survey respondents:

Sample survey responses related to heatmapping approach:

"... (We use...climate) in Risk Acceptance Criteria and Industry Risk Assessment"

"... (Climate is used in) Bucketing of risks (geography, industry, property type segments)"

The average credit impact can be moderate in the near term, but there is likely to be a high degree of obligor-level variability

We found that even in industries exposed to high physical and transition risk, the aggregate/average impact to the portfolio can be moderate. For example, in a portfolio of upstream oil and gas companies, the median impact might be an approximately 7% reduction in EBITDA. However, the difference between borrowers with maximum and minimum impact can be stark. In this example of upstream oil and gas industry, there are several companies with up to a 40% negative impact on EBITDA, while others experience a positive impact on EBITDA in some scenarios due to reallocation of demand of oil and gas. Financial institutions have started evaluating these impacts and plan to explore them further, indicating there is still a long way to go:

Sample survey responses related to counterparty level climate risk assessment:

"Climate Risk Taxonomy and analysis on carbon intensity are used as an input to our internal client ratings for large companies"

"Exploration of climate factors as risk drivers in PD model is a priority"

"...Adjustments to obligor rating methodology and climate loss scenarios, but beyond 12 months"

• For industries exposed to physical hazards, most risk is in knock-on impacts, not through direct damages

The near-term credit impact of direct damages is typically covered through insurance in industries like real estate (both commercial and retail). However, the knock-on effects can dwarf direct impacts, and any assessment of material risk drivers would include requirement of higher insurance payment and impact on the asset due to deterioration in living standards in the community, even though the property itself might not be damaged.

Unmanaged climate risk can have a tangible impact on returns and economic profit

Comprehensive capital analysis and review (CCAR), European Central Bank (ECB) mandated stress tests or regulatory capital driven methodologies might not be appropriate for climate risk assessment. These are focused on capital risks and can underestimate credit impact on single obligors. Climate risk assessment requires understanding of returns from new climate-oriented businesses, and obligor specific scenario analyses – not done well, the impact can be high. At one North American bank, we identified a 35% potential erosion of profits by 2030 in the absence of action on key pockets of climate risk exposure.

Before addressing and mitigating climate risk, financial institutions must address several barriers related to capabilities, data, and analytics

First, financial institutions need internal alignment on their climate ambitions and aspirations to gain stakeholders' buy-in and collaborate with relevant board committees. Financial institutions must also acquire technical capabilities and education by familiarizing themselves with climate science-related topics, risk assessment methodologies, and the complex design choices related to net-zero targets and its impact on credit assessment. As many existing risk assessment tools were not built for the requirements of climate assessment, financial institutions will need an open architecture that can support new requirements for data quality, standardization, and collection. Finally, to capture and address the holistic impact of climate risk on the portfolio, financial institutions need to increase their focus on interdisciplinary skills and mobilization across credit, front-line, and model risk management.

A starting point to overcome these barriers, would be to make significant progress in two important climate risk assessment approaches (i) Climate Scenario Analyses and (ii) Integration of climate into credit processes. Evaluation of data sources that can be used in scenario analyses and credit assessment and analytics that help in providing transparency around impact of potential climate risk will also help financial institutions in understanding the evolving data and vendor landscape.

i. Scenario Analyses to start climate risk assessment journey

Scenario analyses helps financial institutions understand and quantify pockets of climate risk exposure. Outputs from scenario analyses can include portfolio expected loss range under different transition and physical risk climate scenarios in short, medium and long term. Typically, it would also augment the financial institution understanding of climate drivers and transmission channels and how they interact with obligor level credit risk factors.

Scenario analyses consists of three major steps:

Identify risks across portfolios

The first phase is to identify hazards such as floods, hurricanes, or wildfires that are most relevant for the portfolio. In addition to physical hazards, the potential macro-economic impact to different regions (e.g., loss of economic output in counties with high fossil-fuel dependencies), and regional exposure can also feed into the risk identification process. One of the best ways to illustrate this risk is by using a "climate risk heatmap" or an "exposure-at-risk" metric to understand how much of a portfolio is exposed to climate-related vulnerabilities. For example, a financial institution might determine through this exercise that it is exposed to wildfire and coastal flooding due to its geographical concentration in California.

Assess impact on obligor financials

The next phase is to connect these risks to how they can impact financial ratios (e.g., net operating income, property values for a CRE portfolio), or additional drivers of credit worthiness (e.g., additional sponsor risk for CRE). At this point - It is important to start testing detailed scenario analysis for each portfolio while understanding different climate scenarios and their impact on hazards and macro-economic factors. The transmission mechanism of translating this impact to obligor financials can be complex, and should factor in uninsured damages, business interruption and increased insurance costs among others. Since some of this can't be empirically validated at this stage, financial institutions would also be advised to leave ample room for sensitivity analyses of assumptions.

Exhibit 7

Using a phased framework to develop bespoke scenario impact assessment tool for CRE portfolios

Identify risks and specify scenarios		Assess impact on obligor's financials		Quantify portfolio impact
 Identify hazards Flood, hurricane and wildfire most important, given the bank's footprint Transition risk leading to GVA impact in counties with high fossil-fuel dependency 		Impact to Net Operating Income • Uninsured damage from physical risk event • Short term revenue decrease due to business interruption • Increase in insurance cost due to increase in frequency and severity of physical risk Impact to Property Value • Decline in property value due to change in expected		 Mechanism to translate financials to expected loss NOI and property valuation impact Loan-to-value and DSCR of properties, translated into PD, LGD and EL Detailed sensitivity testing, e.g.: Change in cap rate Insurance unavailability for specific hazard like fire, or in a specific state
 Downscale scenarios Hurricane wind severity in every mile across areas where storms have been observed Probability of flood and inundation levels 	Manual Manua Manual Manual Ma Manual Manual Ma Manual Manual Manu	Additional drivers of credit worthiness Community and infrastructure resilience or vulnerability Additional sponsor risk Risk mitigants like levees		

· Quantify portfolio impact of change in obligor financials

The final phase integrates obligor level analysis into credit loss assessment for portfolios. It is important to develop a transparent framework to link changes in obligor financials to changes in credit rating or PD/LGD parameters. We have found that banks in particular can use existing underwriting or loss forecasting models (e.g., CCAR, CECL/IFRS-9, ECB Stress Test) with some modifications to inform this phase.

ii. Integration of climate with credit assessment process

As financial institutions develop their climate risk assessment capability through risk identification and climate scenario analyses, the next level of questions that need to be answered also includes developing an approach to credit decisioning that ensures climate risks are appropriately and sufficiently considered in credit portfolio construction and management. To achieve this, process changes need to be implemented and methodology gaps closed to incorporate climate risk quantitative analysis into the credit adjudication process.

We believe that designing and piloting a climate risk scorecard that uses knowledge gathered during the risk identification and scenario analyses phase will be critical to this effort. For example, a climate risk scorecard for a high priority portfolio like CRE can have the following modules:

Module 1: Pre-screening filter

This is an Initial heuristic-based assessment of property 's vulnerability to climate risk to identify properties exposed to climate risk require further assessment. Example of severity metrics for physical and transition risk can be Flood inundation depth (property level), Fire risk zone (property level), and % of O&G and utilities related sectors in local GDP (e.g., at the county level in the US).

The Output is Climate vulnerability classification of the property as Low or High, with only properties identified as 'High' going through the next two modules.

Module 2: Scenario Analyses Tool

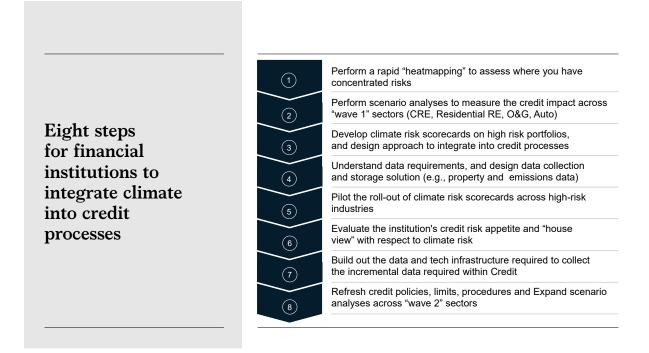
This provides a quantitative estimate of change in credit risk under different climate scenarios for obligors that have been flagged as high risk in the previous pre-screening module. The change in credit risk parameters can be reflected in a separate 'climate score'.

Module 3: Property-level climate scorecard

This module enables qualitative assessment of factors not captured in step 2 to adjust the climate score (through client questionnaire, 1st and 2nd line's assessment). A detail client questionnaire is designed for each sector with graded response options and potential source of information. The output is the adjusted Climate Risk Score.

While practices in climate risk assessment are still very much evolving, we believe it will track the 8-step approach laid out below:

Exhibit 8



The research summarized in this article has highlighted the benefits and challenges of incorporating new data sources and analytical techniques in the various aspects of credit risk and credit portfolio management. We see great promise which should motivate institutions to maintain and intensify their efforts, as most expect to do over the immediate horizon.

In the specific case of assessing the credit implications of climate risk, indicated as the greatest challenge currently facing practitioners, institutions are rapidly implementing methodologies to do this. The article describes the three most immediate steps in this direction, and the benefits of developing a detailed use-case driven understanding of climate data required as input, the technology infrastructure requirements for storage and processing, the reporting requirement for risk assessment, and the best orchestration model across functions. The lessons learned in implementing data and analytics-driven approaches to address credit risk assessment in the past few years, captured in this survey, inform what credit institutions must do to meet the

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