# Understanding the Impact of Regulation on Systemic Risk with ORE

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joint work with

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**2** ORE powering a Systemic Risk Engine

**3** Results: Impact of Collateralization



# Outline

### 1 Introduction

**2** ORE powering a Systemic Risk Engine

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#### Appendix

# The Previous Financial Crisis



- The 07/08 crisis challanged the fundamental assumption that banks cannot fail.
- The failure of a bank causes massive economic damages - and potentially more bank failures.
- This "systemic risk" is seen as particularly prevalent in the interbank derivatives market.
- The problem of reducing "systemic risk" is addressed by regulators worldwide and discussed by experts, who disagree in their judgement.
- No final conclusion has been reached.

# Gap between the Micro- and Macro-economics

#### Micro

- studies a single bank in all its complexities
- ignores systemic effects
- has well-defined types of risk (market risk, credit risk, liquidity risk, model risk, operational risk...) and of risk metrics (VaR, EEPE, LCR, Basel-II-Traffic light test..)
- risk metrics are globally aligned and its use is enforced by regulators
- done primarily in dealer banks

#### Macro

- largely ignores the complexities of single banks
- studies mainly systemic effects
- the US *Office for Financial Research* published "Survey of Systemic Risk Metrics" analysing 31 different metrics of "systemic risk"
- there is not really a consensus on what "systemic risk" precisely is and in what metric it should be measured
- done primarily in central banks and universities









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# Systemic Risk Engine

# Aim: Understand Impact of Regulation on Systemic Risk

- **Evaluate** Has the regulation implemented since the last crisis reduced systemic risk?
- **Predict** How to predict the impact of financial regulation before it is implemented?
- **Optimize** How to find the best possible financial regulation?

#### Problems

- Gap between macro- and micro economics. No standardized metric for systemic risk.
- All trade data of all banks is confidential.
- Banks' risk engines to compute micro metrics are all proprietary.

#### Strategy

- Understand the macro via an aggregation of all the micro (graph theory).
- Use randomly generated financial systems.
- Use an open source risk engine.

# System Architecture



#### **Technology Stack**

 Python: lxml, numpy, networkx, pyvizjs, bqplot, matplotlib seaborn, panadas,json, jupyter

• C++: boost, QuantLib, Open Source Risk Engine

# I.) Random Graph Generation



- The nodedegree in a trade relation graph is empirically known to be Pareto distributed.
- Generating Pareto distributed random sequences of numbers is easy (numpy.random.Pareto).
- Finding graphs that realize a given sequence of node degrees is hard and finding algorithms that compute this is even harder and still subject to active mathematical research.
- We just use the configuration\_erase factory from networkx for now.

# II.) A Graph Model of Financial Systems



We model a financial system  $FS = (B, T, \tau)$  as an undirected *trade relation graph*.

- The nodes B represent the banks.
- The links T represent the trade relations between them.
- All data about the trades is attached to the links via a trade data function

   *τ* : *T* → *Y* (for instance by mapping each trade relation to a list of trade IDs).

# IV.) Open Source Risk Engine (ORE)



- Computes the risk in a derivatives portfolio from the perspective of a single bank using MonteCarlo simulation and risk factor modeling.
- Has been used in consulting projects by Quaternion Risk Management in various tier 1 banks and released initially in 2016.
- Extensive technology stack in C++, based on QuantLib (~400k lines of code).
- Released under a liberal license, which enables new partnerships between academia and the industry.

# V.) Risk Graph



The risk graph RG = (B, A, w) of a trade relation graph  $FS = (B, T, \tau)$  is a directed graph.

- The nodes *B* represent the same banks.
- Each undirected trade relation in *T* is replaced by two arrows in *A* between the same nodes in opposite directions.
- w : A → ℝ<sup>k</sup> is a (possibly multivariate) weight function representing the risk induced from the tail to the head of an arrow.

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# VI.) Aggregation



Using a weighted out-/in-degree the information in a *risk graph* RG = (B, A, w) can be aggregated from the arrows  $a \in A$  to the nodes  $b \in B$ 

$$w^{+/-}(b) := \sum_{\substack{a \in A \\ a \text{ starts / ends at v}}} w(a)$$

and expressed as a percentage of the total of the weight  $w(RG) := \sum_{a \in A} w(a)$  via

$$ho^{+/-}(b) := rac{w^{+/-}(b)}{w({\sf RG})}$$

Any of the quantities w(RG),  $\max_{b \in B} w^+(b)$ ,  $\max_{b \in B} \rho^+(b)$  is a metric of systemic risk.

# Pivot to Systemic Risk Engine

Manual Setup One input config folder for each bank (produced from boilerplate config)

- very straightforward to do
- very messy very quickly: a lot of folders
- massive duplication  $\implies$  risk of inconsistencies

Automatic Setup Compute from perspective of superbank

 use Python (lxml) to produce one set of config files per regulation and ORE to compute all risks from all perspectives separated by netting sets portfolio.xml

• use Python (pandas, matplotlib, networkx, jupyter..) to process each output folder

e Repository Handling

- use git to version control Python scripts (including environment.yml) and input template config, but NOT for the csv or PDF output
- borg backup entire working directory

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# **Collateralization of Derivative Trades**

### Regulations

- $\ensuremath{\texttt{REG\_1}}$  Uncollateralized Trading
- **REG\_2** Variation Margin (VM) collateralized with Thresholds and Minimum Transfer Amounts
- REG\_3 Full Variation Margin collateralization
- REG\_4 Full collateralization with Variation Margin (VM) and Initial Margin (IM)

#### Impact Levels

- Regulation
- Initial System
- 3 Bank
- Ortfolio
- Trade

#### Simulation Parameters

Risk Metric: EEPE (credit risk) Trade Types: IR/FX Derivatives Number of financial systems: 10 Number of banks in each system:  $\leq$  50 Number of trades: 2360

# 1.) Total Impact of Regulation



# 2.) Impact on a Financial System



Size of nodes indicates  $w^+$ , i.e. absolute risk induced into the financial system.

# 3.) Impact on Bank Level in a Financial System

Rho+In %



Relative Risk in Example System Concentration of Risk 100.0 CP 0 CP 90.0 60.0 CP 9 CP 10 CP 11 40.0 CP\_12 30.0 20.0 REG\_1 REG 3 REG 4

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# 4.) Data Mining Impacts on Portfolio Level



# Conclusion

#### Results

- Collateralization reduces systemic credit risk significantly (measured in EEPE, i.e. the cost of resolving a failed system).
- Collateralization does not materially change the concentration of credit risk in a financial system.
- In corner cases (deeply out of the money portfolios), VM collateralization can increase credit risk.
- The overall approach is sound.

#### **Future Research**

- Large scale simulation
- Dependence on distributions of the trades
- Joint analysis of market, credit, liquidity, operational and model risk
- Initial Margin, Funding and Liquidity Risks (XVAs)
- Derivatives Market vs. Money Market
- Study of central clearing regulation
- Agent based creation of trade relation graphs

### References

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# Thank you!

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# Reg\_1: Uncollateralized



- The value of a derivatives contract stems from payments in the future that are not yet settled.
- Example: An FX Forward is a derivative that pay out  $N(FX_T K)$  at T > 0, i.e. it pays out the difference between an exchange rate  $FX_T$  (say GBP/USD) prevailing at T (say T = 1Y from now) and a fixed strike rate (say K = 1.30) times a notional say N = 10 mn).
- A bank that holds a derivative contract that is highly valuable is exposed to the default of its counterparty.
- In case the counterpary default, the derivative is worth nothing and the surviving counterparty incurs a hefty loss.

# Reg\_3: Variation Margin (VM) Collateralized



- To mititage the credit risk in a derivatives contract, the counterpartys can agree to exchange variation margin (VM).
- In that case, if the derivative has positive value for bank *A*, then bank *B* has to pay this amount to bank *A* (say in cash) as collateral.
- This is updated every day, so if the value of the derivative changes back in *B*'s favour, then *A* has to pay collateral to *B*.

# Reg\_4: Variaiton Margin (VM) and Initial Margin (IM) Collateralized • Even a fully VM collateralized to



- Even a fully VM collateralized trade exposes the counterparies to some credit risk: In case of a default the surviving counterparty needs time to close out the position and enter into a new contract with a third party.
- Because the default of a bank causes significant market turmoil, this will take some time, called Margin Period of Risk (MPOR), during which the markets move against the surviving counterparty.
- To mitigate this gap risk, counterparties can agree to post Initial Margin to each other on top of the Variation margin. Despite its name, this also gets re-adjusted potentially daily.