Understanding the Impact of Regulation on Systemic Risk with ORE

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joint work with

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23/11/2018
Introduction

ORE powering a Systemic Risk Engine

Results: Impact of Collateralization

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Outline

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The Previous Financial Crisis

- The 07/08 crisis challenged 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
Micro- vs. Macro-economics

Financial System

Bank A
Trade 1
Trade 2

Bank B
Trade 3
Trade 4
Micro- vs. Macro-economics

Financial System

Bank A
- Trade 1
- Trade 2

Bank B
- Trade 3
- Trade 4

micro
Micro- vs. Macro-economics

Financial System

Bank A

Bank B

Trade 1

Trade 2

Trade 3

Trade 4
Micro- vs. Macro-economics

Financial System

- Bank A
  - Trade 1
  - Trade 2
- Bank B
  - Trade 3
  - Trade 4
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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, pandas, 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.
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 $\tau : T \rightarrow Y$ (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.
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.
- \( w : A \to \mathbb{R}^k \) is a (possibly multivariate) weight function representing the risk induced from the tail to the head of an arrow.
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- $w : A \to \mathbb{R}^k$ is a (possibly multivariate) weight function representing the risk induced from the tail to the head of an arrow.
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 $b \in B$

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

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

$$\rho^{+/-}(b) := \frac{w^{+/-}(b)}{w(RG)}.$$ 

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 $\Rightarrow$ 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

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

```xml
portfolio.xml
<Trade id="FS1.CP2.CP3.TRADE4">
  <TradeType>FxForward</TradeType>
  <Envelope>
    <CounterParty>FS1.CP2</CounterParty>
    <NettingSetId>FS1.CP2.CP3</NettingSetId>
  </Envelope>
</Trade>
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Collateralization of Derivative Trades

Regulations

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

1. Regulation
2. Financial System
3. Bank
4. Portfolio
5. 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

Total Average Risk across all Financial Systems

<table>
<thead>
<tr>
<th>Total EEPE in EUR mn</th>
<th>REG_1</th>
<th>REG_3</th>
<th>REG_4</th>
</tr>
</thead>
<tbody>
<tr>
<td>-74.01 %</td>
<td>-95.00 %</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2.) Impact on a Financial System

REG_1 (uncoll.)  
REG_3 (VM coll.)  
REG_4 (VM & IM coll.)

Size of nodes indicates $w^+$, i.e. absolute risk induced into the financial system.
3.) Impact on Bank Level in a Financial System

Absolute Risk in Example System

Impact of Collateralization on Systemic Risk By Counterparty

Relative Risk in Example System

Concentration of Risk
4.) Data Mining Impacts on Portfolio Level

Histogram of Relative Impacts on Portfolios

Absolute Impact on all Portfolios

REG_1 (uncoll.) vs. REG_3 (VM)

Total Change in EEPE in EUR mn

-3,500
-3,000
-2,500
-2,000
-1,500
-1,000
-500
0
500

increase
decrease

REG_1 vs. REG_3
REG_1 vs. REG_4
REG_3 vs. REG_4
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

- Systemic Risk paper
  https://ssrn.com/abstract=3090617
- Fintech Lab
  http://fintech.datascience.columbia.edu/
- Quaternion Risk Management
  https://www.quaternion.com/
- SIPA
  https://sipa.columbia.edu/
- Open Source Risk Initiative
  http://www.opensourcerisk.org/
- Open Source Risk Engine
  https://github.com/OpenSourceRisk/
- Initial Margin research
  https://ssrn.com/abstract=3147811
  https://ssrn.com/abstract=2911167
  https://ssrn.com/abstract=3132008
- Borg Backup
  https://www.borgbackup.org
Thanks

- Sharyn O’Halloran, George Blumenthal Professor of Political Economics and Professor of International and Public Affairs, Columbia University, New York City
- Donal Gallagher, CEO of Quaternion Risk Management, Dublin

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 counterparty default, the derivative is worth nothing and the surviving counterparty incurs a hefty loss.
Reg_3: Variation Margin (VM) Collateralized

- To mitigate the credit risk in a derivatives contract, the counterparties 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.
Even a fully VM collateralized trade exposes the counterparties 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.