

# Enhancing Our Risk Appetite Framework

A Case Study

#### **Desired Outcomes**

- 1. An approach to developing a risk appetite framework and risk appetite statement.
- 2. Understanding how a risk appetite framework can be operationalized.
- Identifying and overcoming challenges to asserting the value of risk appetite to stakeholders.



### History

- Inaugural group policy/statement in 2011
- Businesses established risk appetite policies and protocols in 2008-2009
  - International business has an actively managed risk appetite framework
- Risk appetite metrics and dashboard are part of ongoing corporate ERM reporting
- Risk appetite concepts are evolving in the industry
- Aim for our risk appetite framework to be both defensive and opportunistic

# Objectives - enhancing framework

- Strengthen link to our vision, strategy and business objectives
- More forward-looking
- Enhance consideration stakeholders
- Incorporate upside and downside
- Vet and validate existing risk tolerances and limit metrics
- Use it
- Continuous improvement



### Approach

#### **Broad Steps**

- Agree principles
- Risk appetite policy
- Questionnaire
  - Multiple rounds
- Group risk appetite statement
- Cascade to business

#### Governance

- Business risk committees
- Executive Risk Management Committee
- Senior management
- C-Suite
- Members of Board of Directors

#### **Establishing Risk Appetite**

- The risk appetite framework should clearly align with our vision and business strategy.
- The risk appetite framework should identify risk preferences for all material risks.
- The diverse interests and objectives of key stakeholders should be considered.
- For risk exposures that are challenging or inappropriate to quantify, qualitative boundaries should be developed and assessed.



#### **Embedding Risk Appetite**

- Ownership of and adherence to risk appetite should be embedded in culture and expectations.
- The risk appetite framework should be cascaded through the company to achieve understanding and support and will build off of business unit and functional operating policies and procedures.
- Risk and other management committees should put the risk appetite framework into practice at the business and/or functional levels;
  - They have oversight responsibility to ensure decisions are consistent with group objectives and risk appetite.

#### **Embedding Risk Appetite**

- Evidence of strategy and risk appetite alignment at both enterprise and business segment levels should be provided.
- Risk limit metrics should relate to business objectives and stakeholders priorities as well as specific objectives of the business unit or function.
- Managing within risk appetites should be practical, applicable and actionable.

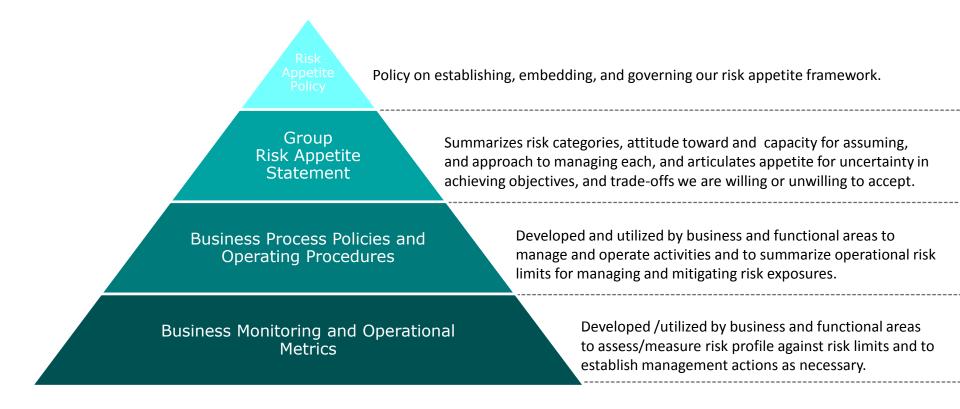


#### Governance

- Board of Directors and senior management involvement, responsibility, and ownership should be clearly established.
- Roles and responsibilities for monitoring adherence to risk appetite should be clearly established.
- Risk appetites should be reassessed after significant events and reviewed by the Board of Directors at least annually.



### Components



Policies, statements, processes and governance that establish and monitor adherence to Risk Appetite

#### Components

#### Risk Limits:

- Granular operational controls, associated with business process policies and operating procedures designed to improve risk-taking.
- Forward-looking measurements that cascade risk tolerances to lower levels of granularity.
- Convenient to monitor, and established at/for the level of the organization that manages risk on a day-to-day basis.
- Serve dual purpose –enough risk taken and as a brake against excessive risk taking.

#### Components

- Risk Profile:
  - Point in time assessment of risk exposures, measuring them relative to our risk tolerances and limits
  - Business monitoring and operational metrics support adherence to risk appetite
- Stress and scenario testing:
  - Utilized to set expectations and highlight risk exposures, allowing management to determine appetite for each and used to monitor against risk tolerances and limits

#### Questionnaire - Primer

| Many employees have laptop computers, allowing them great flexible in how and where they work. What is your appetite for a stolen lapto (the physical asset)? |         |
|---|---------|
| 1-Averse: We have zero or near-zero tolerance and avoid this reat all costs.  | isk     |
| 2-Cautious: We have low tolerance and avoid this risk except<br>under rare circumstances.   |         |
| 3-Moderate: We have limited tolerance, will accept the risk if<br>outweighed by benefits, and if it can be carefully measured,<br>monitored, and corrected.   |         |
| 4-Flexible: We have tolerance, will accept this risk for high likelihood of gain, and will manage the impact.   |         |
| 5-Tolerant: We have a high level of tolerance and accept this ris   | k in    |
| order to exploit the gains.   | SE RISK |

MANAGEMENT SYMPOSIUM

#### Questionnaire - Primer

| What is your appetite for access to customer information or confidential data by the individual who stole the laptop?                                 |
|---|
| 1-Averse: We have zero or near-zero tolerance and avoid this risk at all costs.   |
| 2-Cautious: We have low tolerance and avoid this risk except<br>under rare circumstances.   |
| 3-Moderate: We have limited tolerance, will accept the risk if outweighed by benefits, and if it can be carefully measured, monitored, and corrected. |
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MANAGEMENT SYMPOSIUM

#### Questionnaire - Categories

- What are our strategic/business objectives?
- For each risk category, what is tolerance for each?
- What is our attitude regarding uncertainty in achieving them?
- When faced with decision making, how willing are you to put achievement of each objective at risk?

### Questionnaire - Purpose

- Help senior management and the Board articulate levels of appetite for/aversion to different risks AND tolerance with uncertainty in achieving our key business objectives
- Intended to draw out views and perceptions
- Educate and synthesized to an aligned view

#### Questionnaire - Outcomes

- The method began and sustained the risk appetite conversation.
- We got at the heart of understanding our culture's risk appetite.
- Improved understanding and consistency regarding what we are trying to accomplish



#### Risk appetite framework

#### Decision making framework

- Guidance
- Encourages discussions
- Attitude for consideration of risks and volatility
- High-level filter through which we consider decisions and changes to strategy

#### **Accountability framework**

- Establish boundaries
- Ongoing measurement
- Review of profile against risk appetite – are we operating within our risk appetite?
- Encourages advance preparation and action planning

#### **Supports culture**

- At all levels of the organization, encourages operating in a manner that is mindful of risk implications
- Simple actions protect our results
- Encourages critical thinking and good judgment

#### Defensive and opportunistic

- Early warning system, serving as a control against excessive risk taking
- Also, highlights capacity for risk taking to drive growth and capitalize on opportunities



### Risk Appetite Statement

## Vision & Values Strategy

#### **Risk Appetite**

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We assume risks to create value and achieve objectives. Risk appetite articulates:

- Our preferences
- Our attitude toward and capacity for assuming additional risk
- Our approach to managing our risks.



Risk management supports achievement of objectives. Risk appetite articulates the level of uncertainty we are comfortable with in achieving our objectives

- 1. Protecting and growing our franchise value
- 2. Maintaining adequate and efficient levels of capital
- 3. Maintaining liquidity to satisfy obligations
- 4. Achieving target performance

Implicit in our strategy and aligned with our vision and values is maintaining a solid financial ENTERPRISE RISK foundation, meeting commitments to policyholders and maximizing shareholder value over the MPOSIUM long term.

#### Risk Preferences



#### Minimize Exposure

Strategic Insurance Credit Market Operational Reputational

Capacity

Definition

Focus

Avoid

Strategy

**Expertise** 

**Preferences** 

N /

#### Risk Tolerances - examples

# Franchise Value Protection and Growth

- Brand, reputation
- Data security and privacy
- Third parties
- Regulatory compliance

# Capital and Liquidity Management

- Regulatory/excess capital
- Liquidity metrics
- Use of stress testing and EC
- Capital quality and fungibility

# Target Performance Achievement

- Minimum profitability
- Sale/price balance
- Volatility sensitivity testing
- Statutory and GAAP



#### Cascading to the business

#### Establishing risk tolerances and limits

- Risk and other management committees have oversight responsibility
- Business units determine risk tolerances and limits, utilizing existing structures
  - Risk limits are applicable and serve as metrics by which to manage within risk appetite.
  - Aligns with level at which business decisions are made.
- Encourages operating with a risk management mindset.
  - Accountable for establishing/enhancing programs to keep risk exposures within risk appetite using risk limits and actions triggered as needed

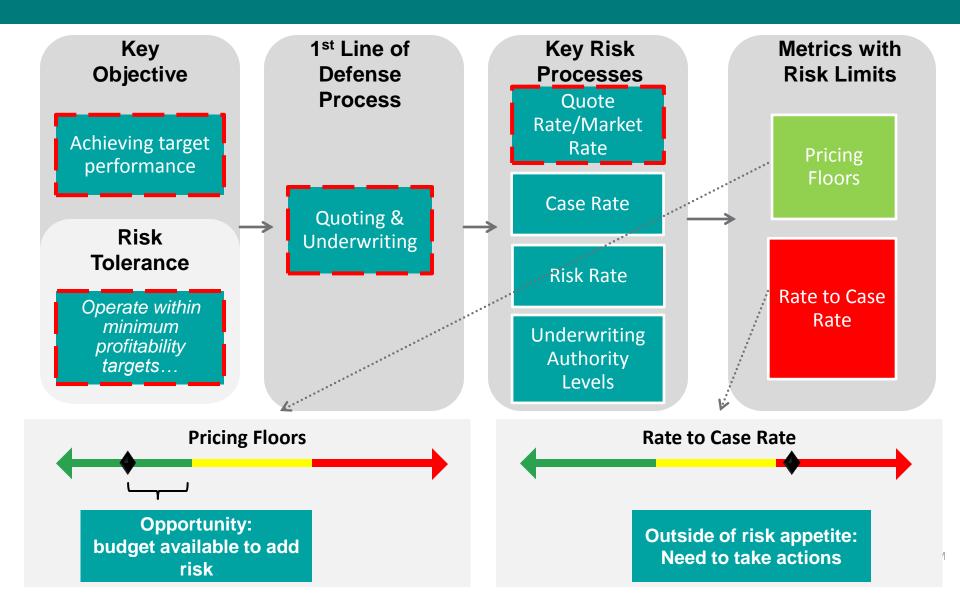
#### Cascading to the business

#### Monitoring and reporting

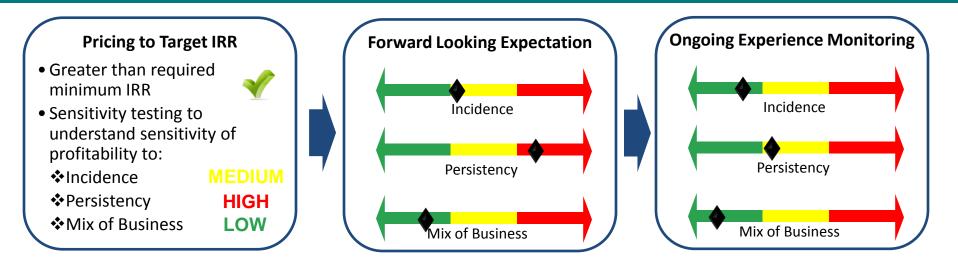
- Accountability for establishing policies and procedures with relevant risk limits.
- Anticipate risk limit breaches, by considering a <u>projected</u> <u>risk profile</u>
- Escalation process with procedures to ensure action
- Employ "soft limits" and "hard limits".
  - Soft limits relate to an exposure level that triggers discussion and heightened monitoring, but for which remedial action is not yet necessary.
  - Hard limits breach results in immediate remedial action.

### Establishing the link





### Establishing the link



Sensitivity testing can be used to understand volatility, determine risk appetite and monitor against it.

