

RISK MANAGEMENT IN ISLAMIC BANKING

A conceptual framework

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Tariqullah Khan is associated with the Islamic Research and Training Institute (IRTI), the Islamic Development Bank (IDB). Views expressed in the lecture are his own and do not necessarily reflect those of IRTI-IDB and member countries.

Running order

Part 1

Presentation 20 Minutes

Questions

DLCs 2-3 Minutes each

Tehran

Karachi

Lboro

Islamabad

Answers 10 Minutes

TOTAL 40 Minutes

Part 2

Presentation 20 Minutes

Questions

DLCs 2-3 Minutes each

Karachi

Lboro

Islamabad

Tehran

Answers 10 Minutes

TOTAL 40 Minutes

Part 3

Presentation 20 Minutes

Questions

DLCs 2-3 Minutes each

Islamabad

Lboro

Tehran

Karachi

Answers 10 Minutes

TOTAL 40 Minutes

Main References

- **Chapra, M. Umer & Khan, Tariqullah (2000), *Regulation and Supervision of Islamic Bank*, Jeddah: RTI**
http://www.sbp.org.pk/departments/ibd/Regulation_Supervision.pdf
- **Khan, Tariqullah and Habib Ahmed (2001), *Risk Management: An Analysis of Issues in Islamic Financial Industry*, Jeddah: IRTI**
http://www.sbp.org.pk/departments/ibd/Risk_Management.pdf

Presentation outline

- Part – 1: Discusses the systemic framework of the balance sheet of an Islamic bank and its risks and soundness considerations;
- Part – 2: Deals with the unique risks of Islamic modes of finance and the perception of the industry in this regard, and
- Part – 3: Explores the possibility of developing an internal risk rating system for Islamic modes of finance.

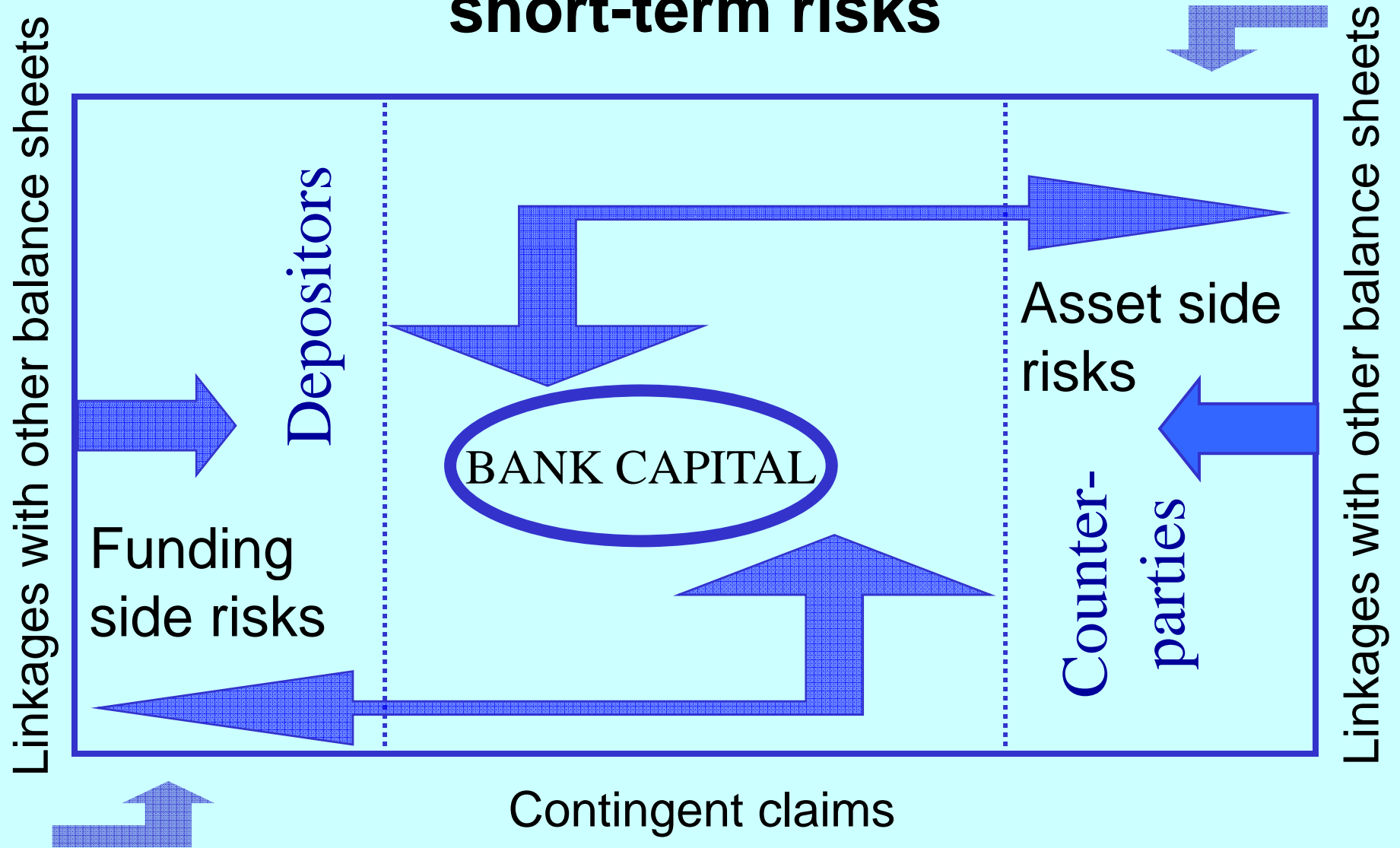
PART I
SYSTEMIC FRAMEWORK

Risks and risk factors

- Risk shall be seen as the probable loss of income and assets' value. Only unexpected losses are included and expected losses are not included in the definition of risk.
- The sources of the possibility of future losses can be classified into:
 - Financial
 - Business
 - Operational

We will return to these in part – 2 of the lecture

Banking is about intermediation of short-term risks



Key parties and their considerations

1. Depositors: May withdraw;
2. Banks: Tend to accumulate assets to maximize return on equity;
3. Counter-parties: May default;
4. Regulators: Seek banking soundness;
5. Other companies and households within the interlinked balance sheets, have contingent claims on each other and
6. Public/tax payers: Faces the cost of deposit protection and financial crisis.

To establish banks that are Shari'ah compliant, enjoy depositors' confidence, and are efficient and stable!

Sources of funds

| ISLAMIC BANKS | TRADITIONAL BANKS |
|--|--|
| Tier – 1 Capital (equity) | Tier – 1 Capital (equity) |
| Tier – 2 Capital (?) | Tier – 2 Capital (Subordinated loans) |
| Current accounts | Current accounts |
| Saving accounts | Interest-based Saving accounts |
| Unrestricted Profit Sharing Investment Accounts (PSIAs) | Time & certificates of deposits |
| Profit equalization reserves (PER) | Reserves |
| Investment risk reserve (IRR) | |

.... Sources of funds

| ISLAMIC BANK | TRADITIONAL BANK |
|--|---|
| Current accounts | Current accounts |
| <p>Banks in both cases use shareholders' equity to protect these deposits</p> | |
| Profit sharing investment accounts (PSIA) | Time deposits, certificates of deposits, etc – fixed income liabilities |
| <p>Shareholders' equity protects these liabilities <u>only in case of fiduciary risks (theory)</u>; Profit Equalization Reserve (PER) & Investment Risk Reserve (IRR)</p> | <p>Shareholders' equity and subordinated loans protect these liabilities against all risks</p> |
| Cost of funds: Variable | Cost of funds: Fixed |

Uses of Funds

ISLAMIC BANKS

Cash & balances with other banks

Sales Receivables
(Murabaha, Salam, Istisna'a)

Investment securities

Musharaka financing

Mudaraba financing

Investment in real estate

Investment in leased asset

Inventories (including goods for Murabaha)

TRADITIONAL BANKS

Cash & balances with other banks

Loans

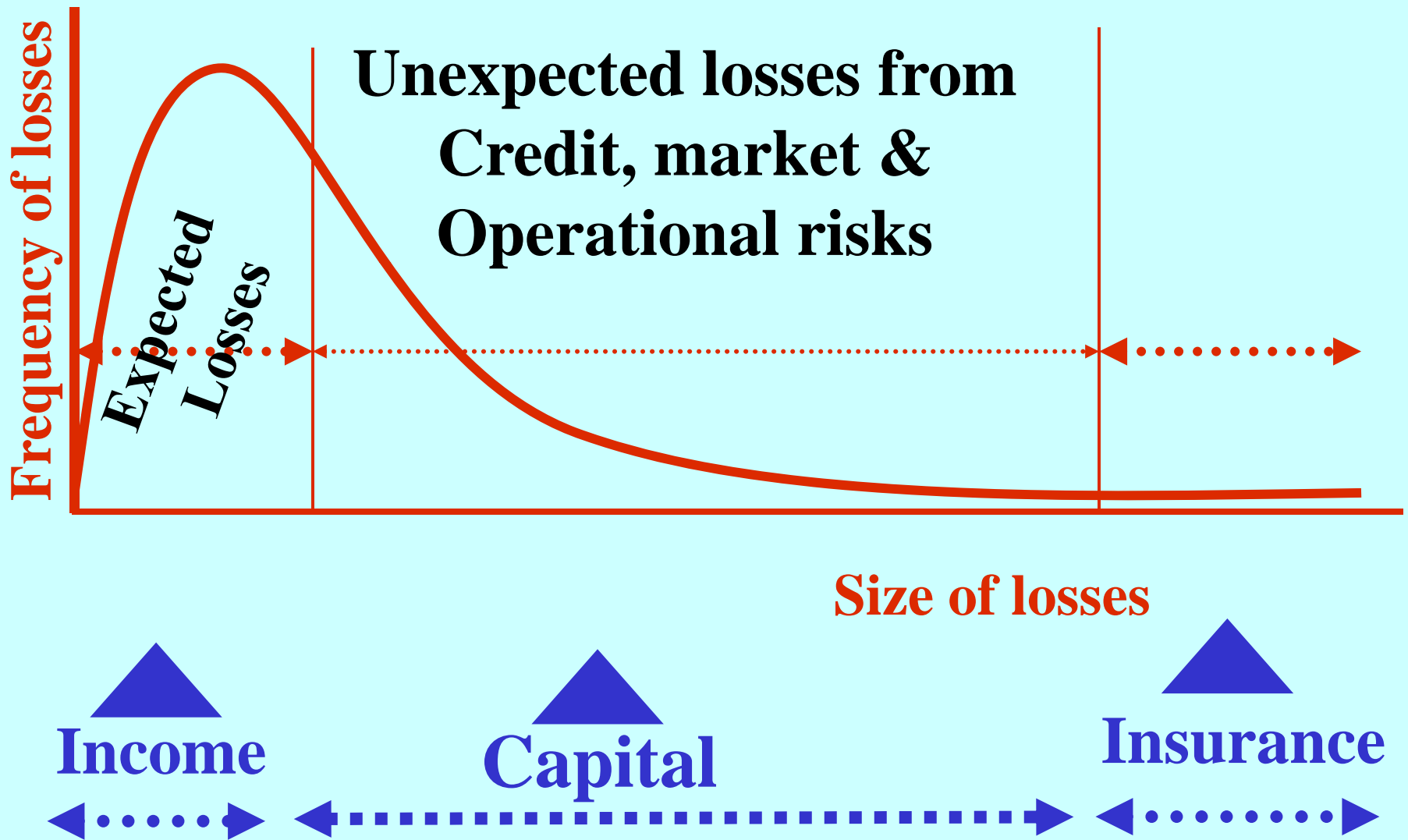
Mortgages

Financial leases

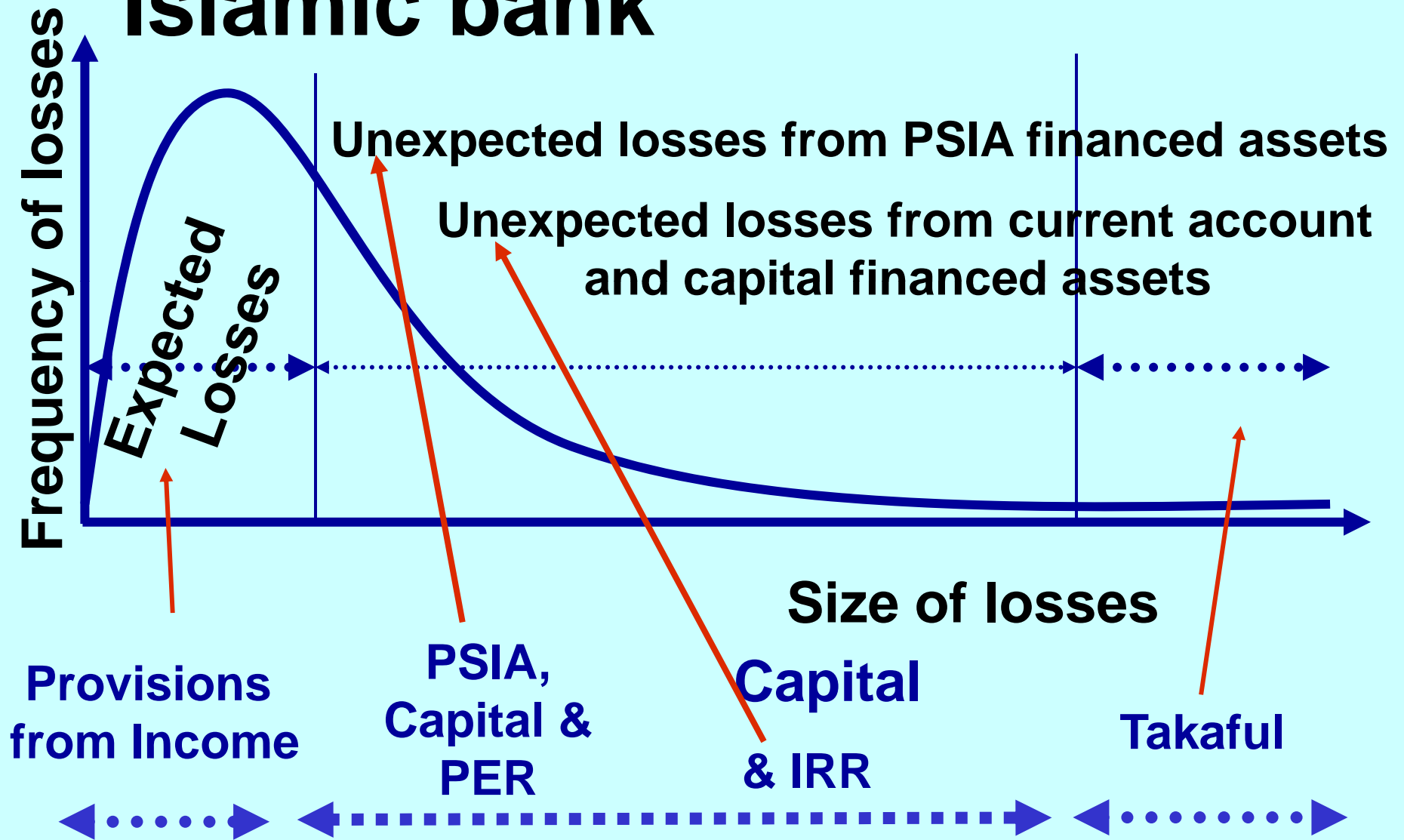
Investment in real estate

Securities

Sustaining losses



Ensuring the stability of an Islamic bank



Risks of PSIA financed assets

| Risks | Risk Mitigation |
|---|--|
| Displaced commercial risk (withdrawal risk) | Profit equalization reserve (PER) from shareholders' contributions |
| Fiduciary risk | Capital (%?) |
| Commercial loss | PSIA-holder, Investment risk reserve (IRR) from PSIA-holders' contribution |

Risks of PSIA financed assets: Emerging rules

- Rule – 1: Completely separate the PSIA financed assets from all other assets financed by current accounts and capital
- Rule – 2: Allocate risks between PSIA holders and shareholders, e.g., Regulatory capital for PSIA financed assets = capital/50% of PSIA financed assets
- Rule – 3: Apply Basel risk weighting rules
- Rule – 4: Establish IRR and PER

Unique systemic risks

- Risk transmission between current accounts and investment accounts (between Qard and Qirad)
- Income mixing between Shari'ah compliant and non-complaint sources



**Need for separate capital as
firewall**

Role of capital: Once again!

$$\textit{Leverage Ratio} = \frac{\textit{Capital}}{\textit{Total Assets}}$$

- In the two-tier Mudharabah Model this ratio is 1
- People are doing business with their own money
- Only 100% loss of asset value will wipe out equity

..... Hence, under this model
banking instability is not a concern.

Consider

Bank capital = \$ 10

Assets = \$ 100

Capital/Asset Ratio is 1: 10

\$ 1 of equity is bearing the risks of \$10 of assets;

Only 10% loss of asset value will wipe-out all equity

... consider

Bank Capital is \$ 10

Asset are \$ 100

**Connected lending – funds allocated to
owners' interest groups are \$ 20**

How much is actual capital?

\$ 10,

\$ - 10 or

\$ - 20?

..... Consider

Bank Capital is \$ 10

Assets are \$ 100

\$40 are concentrated on a single client, in a single line of business, and the client's credit rating has been downgraded

How sound is the Bank?

These and numerous other considerations that effect the quality of assets require risk weighting of assets

Risk weighted assets: A measure of banking soundness

$$\text{Risk-Based Capital Ratio} = \frac{\text{Capital}}{\text{Risk-Adjusted Assets}}$$

Credit

Operational

Market



Standardized risk weighting for all banks

Banks' own internal risk rating systems

The Basel II Pillars of a

sound banking system

**Pillar
1**

**Minimum
Capital
Requirement**

**Pillar
2**

**Transparency
and
disclosures**

**Pillar
3**

**Effective
Supervision**

PART II
UNIQUE RISKS OF ISLAMIC BANKS

Risk factors

Financial

Business

Operational

Financial risk factors

- **Credit risk**
 - Default risk
 - Down grade risk
 - Counter party risk
 - Settlement risk
- **Market risk**
 - Price risk
 - Rate of return risk
 - Exchange rate risk
- **Liquidity risk**
 - Funding liquidity risk
 - Asset liquidity risk
 - Cash management risk

Business risk factors

- **Management Risk**
 - **Planning**
 - **Organization**
 - **Reporting**
 - **Monitoring**
- **Strategic Risk**
 - **Research and development**
 - **Product design**
 - **Market dynamics**
 - **Economic**
 - **Reputation**

Operational risk factors

- **People risk**
 - Relationships
 - Ethics
 - Processes risk
- **Legal risk**
 - Compliance
 - Control
- **System risk**
 - Hardware
 - Software
 - Models
 - ICT
- **External risk**
 - Event
 - Client
 - Security
 - Supervisory
 - Systems
- **Equity investment risk?**

Islamic modes of finance:

Unique risk factors

- Liquidity originated market risk
- Transformation of credit risk to market risk and market risk to credit risk at various stages of a contract
- Bundling of credit risk and market risk
- Market risk arising from owning the underlying non-financial asset until maturity of a contract or until the ownership is transferred to customer
- Treatment of default

Unique balance sheet features of IBs from market risk perspective ...1

- In traditional banks, market risk is mostly in the trading book
- In Islamic banks, market risk is concentrated in the banking book due to Murabahah, Ijara, Salam, Musharakah and Mudharabah in the banking book asset portfolio
- Hence it is unique for Islamic banks that market risk and credit risk are strongly bundled together

Unique balance sheet features of IBs from market risk perspective 2

These are re-price-able

| Liabilities | | Assets | |
|------------------|-----|------------|-----|
| Capital | 10 | Murabahah | 70 |
| | | Istisna | 10 |
| PSIAs | 50 | Ijarah | 10 |
| Current accounts | 40 | Salam | 4 |
| | | Musharakah | 3 |
| | | Mudharabah | 3 |
| Total | 100 | | 100 |

These are not re-price-able

Banking book market risk in IBs

Assumption: 1 % increase in benchmark price

| | IB 1 | | IB 2 | | IB 3 | |
|----------------------------|------|-----|------|------|------|---|
| | L | A | L | A | L | A |
| Re-price-able | 10 | 10 | 10 | 4 | 5 | 5 |
| Non-re-price-able | 0 | 0 | 0 | 6 | 5 | 5 |
| Balance Sheet value change | .10 | .10 | .10 | -.02 | 0 | 0 |
| Asset value change | 0 | | -.12 | | 0 | |

Banking book market risk in IBs

Assumption: 1 % decrease in benchmark price

| | IB 1 | | IB 2 | | IB 3 | |
|----------------------------|------|-----|------|-----|------|---|
| | L | A | L | A | L | A |
| Re-price-able | 10 | 10 | 10 | 4 | 5 | 5 |
| Non-re-price-able | 0 | 0 | 0 | 6 | 5 | 5 |
| Balance Sheet value change | .10 | .10 | -.10 | .02 | 0 | 0 |
| Asset value change | 0 | | .12 | | 0 | |

Credit (default) risk

- An unexpected loss in a bank's income due to delay in repayment or non-repayment in full by the client as contractually agreed
- Default risk covers over 80% of risks in an average bank's banking book asset portfolio
- It is the cause of over 80% cases of bank failures
- Default risk, also causes market risk and liquidity risk

Unique credit risk features of IBs1

- Treatment of default: In Islam, compensation-based restructuring of credit is the most well known form of Riba, namely, Riba Al Jahiliyah – this highly necessitates credit risk management
- Moral issues in loan loss reserves
- Collateral quality (restrictions on use of sovereign bonds)
- Insurance – clients' insurance and facilities insurance
- Diverse modes and bundled risks

Unique credit risks of IBs.... 2

- Mudharabah / Musharakah
 - Default event undefined
 - Collateral not allowed
- Salam / Istisna'
 - Counterparty performance risk
 - Separation of market risk from default risk difficult
 - Catastrophic risk high
- Murabahah
 - Baseline default risk, but counterparty risk due to embedded option (Murabahah, binding non-binding matter) also exists
- Conglomeration of risks – each mode having various risks, credit, liquidity, market, reputation,

Perception of Islamic banking industry about risks

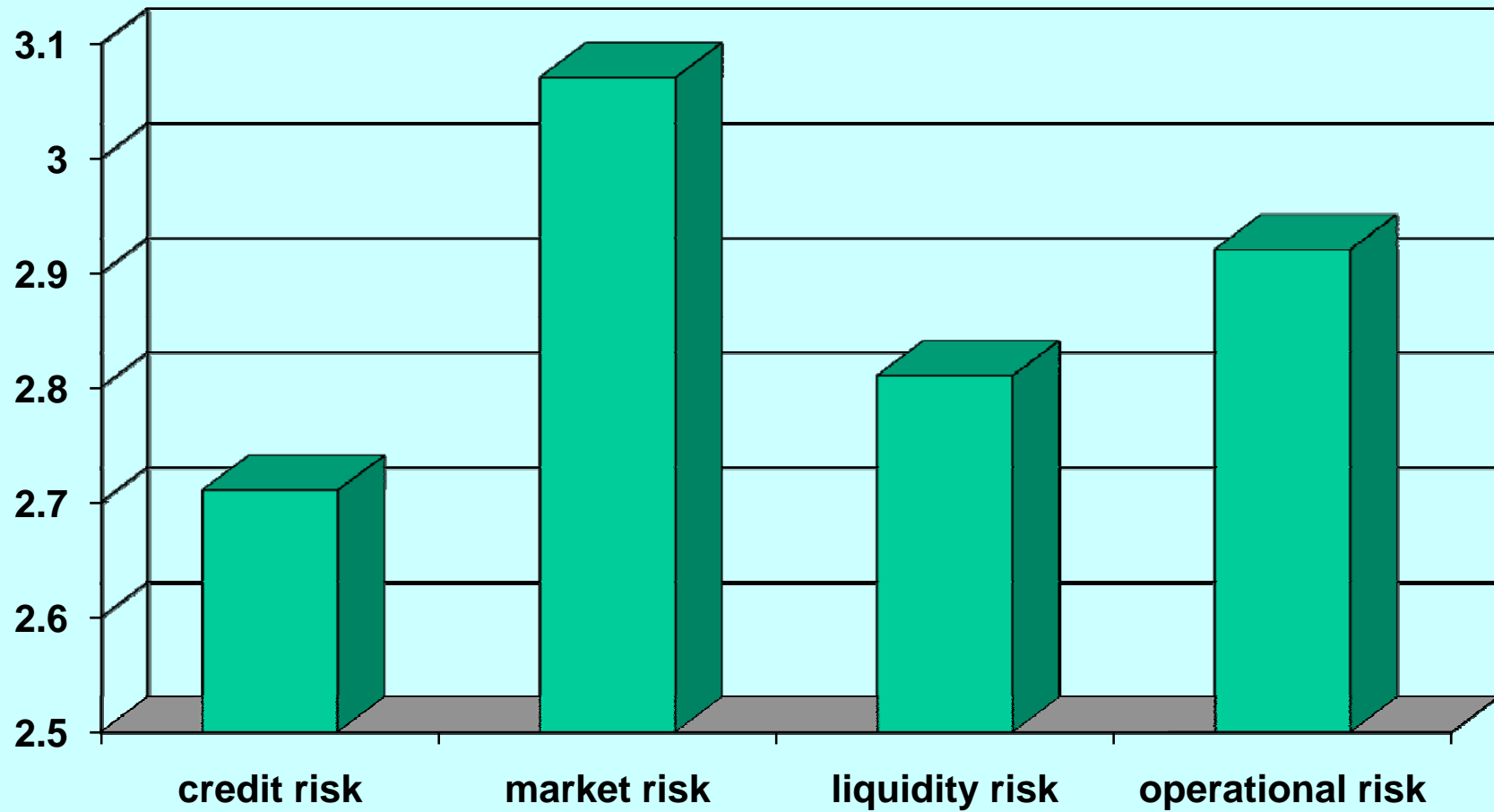
The research asked Islamic banks to rank the Islamic modes of finance used by them from 1 (least severe) to 5 (most severe) in terms of risks.

Responses of 15 Major Islamic banks are included.

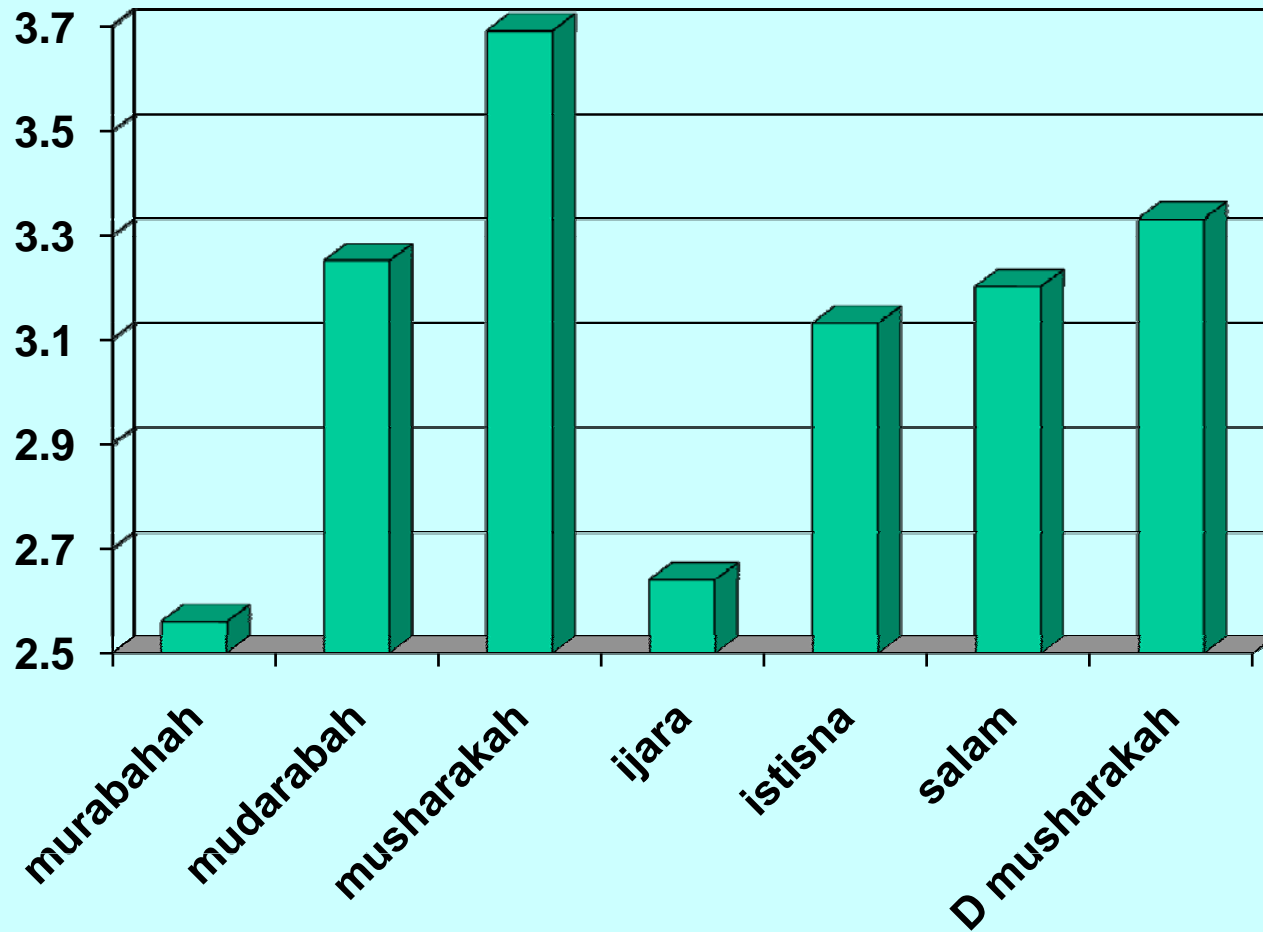
Outlier responses are not included.

Based on, Tariqullah Khan and Habib Ahmed (2001), *Risk Management: An Analysis of Issues in Islamic Financial Industry*, Jeddah: IRTI

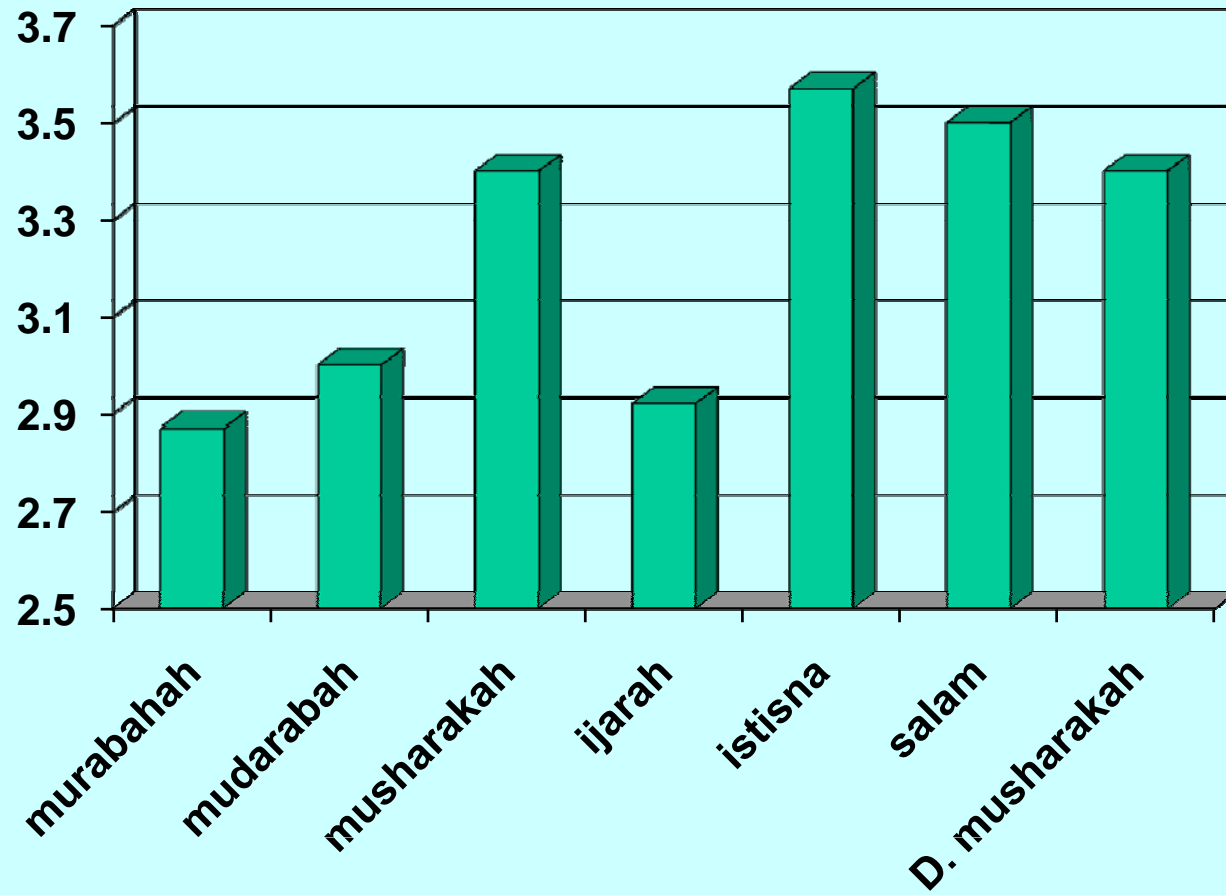
Industry averages



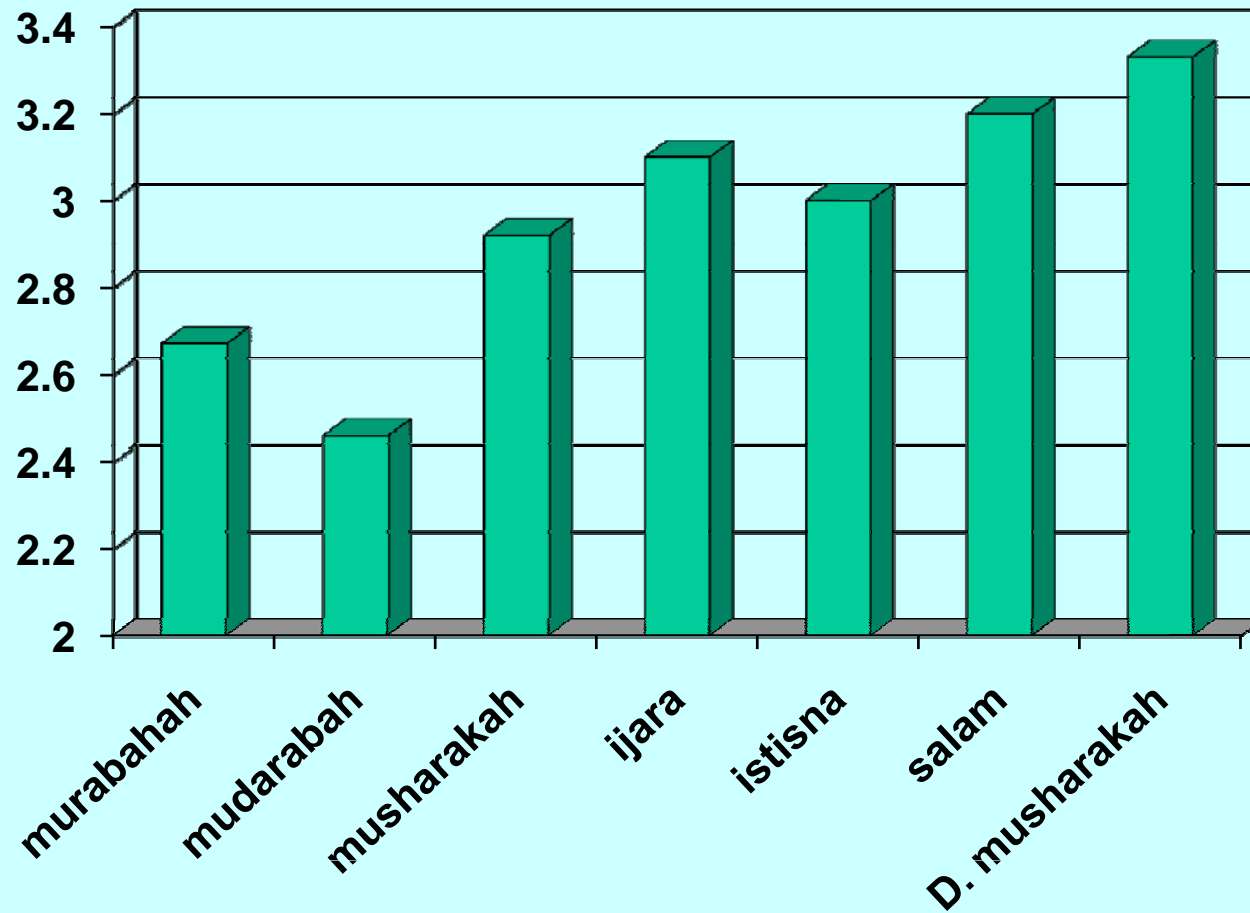
Credit risk



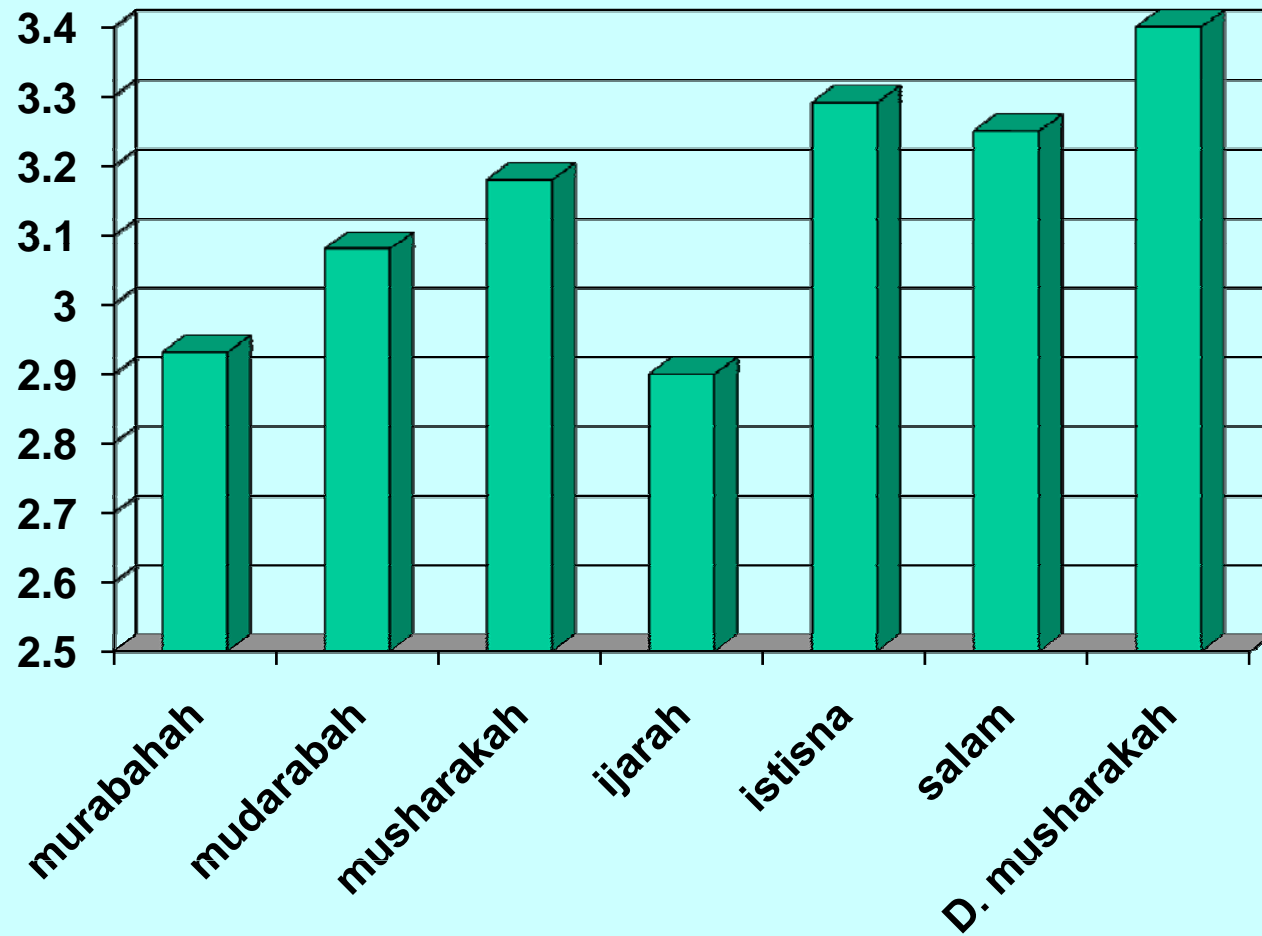
Market risk



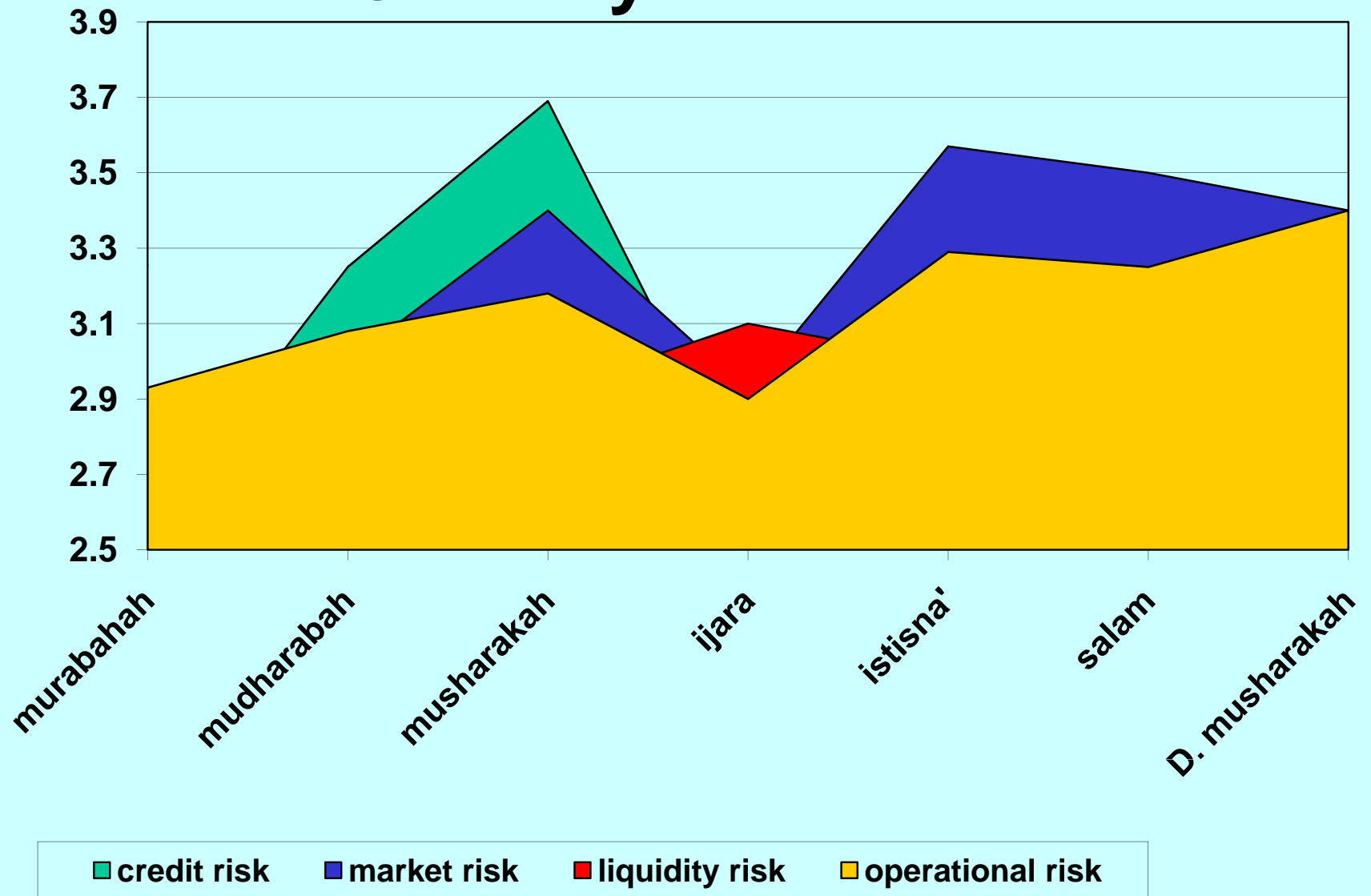
Liquidity risk



Operational risk



Severity of risks

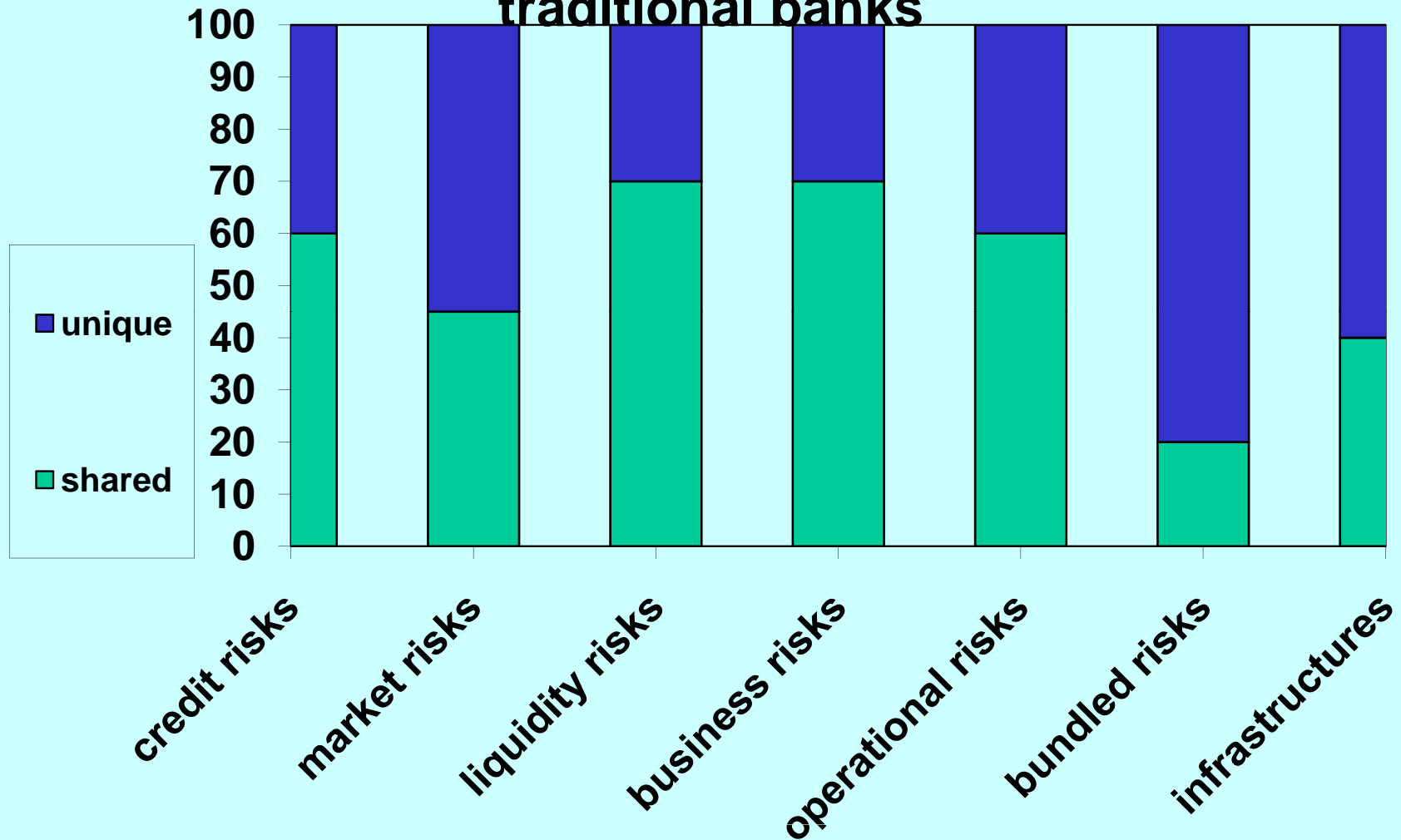


**Part II – EXPLORING AN INTERNAL
RATING SYSTEM FOR ISLAMIC
MODES OF FINANCE**

Need for broader look

| Mode of finance | Obligor | Business line - 1 | | | Business line - 2 | | |
|-----------------|---------|-------------------|------------|------------|-------------------|------------|------------|
| | | < 1 year | 1- 2 years | 2 -3 years | < 1 year | 1- 2 years | 2 -3 years |
| Murabahah | AAA | | | | | | |
| | BBB | | | | | | |
| | CCC | | | | | | |
| Musharakah | AAA | | | | | | |
| | BBB | | | | | | |
| | CCC | | | | | | |
| Istisna' | AAA | | | | | | |
| | BBB | | | | | | |
| | CCC | | | | | | |
| Ijara | AAA | | | | | | |
| | BBB | | | | | | |
| | CCC | | | | | | |

Islamic banks' risks: Unique versus shared with traditional banks



Challenge: How to capture the unique risks of IBs?

- The answer is to develop Internal Rating Systems (IRSs) in IBs
- IRSs can be considered as risk-based inventories of individual assets of banks either based on the loss given default (LGD) of the facility or probability of default (PD) of the obligor or both
- Most IRSs are **JUDGMENTAL NOT STATISTICAL**
- Rationale for IRSs

Uses of IRSs

- IRSs differ from bank to bank, from use to use
- IRSs are used for a number of purposes:
 - guiding credit origination process,
 - portfolio monitoring and management reporting
 - Analysis of adequacy of loan loss reserves and capital
 - Profitability and loan pricing analysis
 - Input to formal mathematical modes of risk management
 - Facilitate prudential bank supervision

Desirability of IRSs for IBs

- To capture the diverse nature of the Islamic modes of finance
- Internal ratings are based on the profile of individual assets, not on a bucket of assets
- Internal ratings help the development of systematic database of critical financial variables
- Internal ratings supplement external credit assessment
- Internal ratings can enhance external ratings
- Internal ratings improve quality of MISs

.....desirability of IRSs

- Formal internal ratings are normally used by large and sophisticated banks
- The size of most Islamic banks is very small and therefore, their capacity to develop internal rating systems is limited in general
- For a long time, this method cannot be utilized for supervisory assessment of individual Islamic banks' risks
- However, initiation of IRS is imperative to develop risk management culture consistent with the Islamic modes of finance

Sources and inputs of IRSs

- Client oriented system - probability of default (PD)
- Facility oriented system - value of an asset expected to be lost in the event of a default (loss given a default: LGD)
- In both cases: balance sheet value of total asset i.e., Exposure-at- Default (EAD)
- Maturity of facility
- Concentration of credit to the specific client as a percentage of total portfolio, etc.

PDs: Starting point in building IRBs

In the framework of Basel II, with the approval of supervisors, banks can use their own internal assessments of their **asset risk components** for meeting regulatory capital requirements.

Asset risk components: Probability of default (PD), loss given default (LGD), exposure at default (EAD), and effective maturity of facility (MOF)

Foundation internal ratings based (IRB) approach
– **Banks use their own PDs**; supervisors assign LGDs, EADs, and MOFs

Advanced IRB approach – banks can use their own PDs, LGDs, EADs, and MOFs

Building judgmental default probabilities

- Analysis of financial statements of the client to assess its future cash flow and its ability to meet its contractual obligations
 - Debt service capacity of the client
 - Liquidity of the clients' balance sheet
 - Historical earnings
 - Access to sources of funds
 - Leverage ratio etc
- Peer group analysis
- Audit reports
- External credit assessment reports etc

Internal capital allocation: An Example

Survey results regarding risk perceptions
Rank 1 (not serious) to 5 (critically serious)

- *Musharakah* 3.69
- Diminishing *Musharakah* 3.33
- *Mudarabah* 3.25
- *Salam* 3.20
- *Istisna* ' 3.13
- *Ijarah* 2.64
- *Murabahah* 2.56

.... Internal allocation of capital: An Example

| Modes of finance | Risk perception | | Weight (w), Index Murabahah=100 | Capital needs \$ |
|------------------|-----------------|--------|------------------------------------|------------------|
| | 1 to 5 | % of 5 | | |
| Musharakah | 3.69 | 73.8 | 144; w=1.44 | 288 |
| D. Musharakah | 3.33 | 66.6 | 130; w=1.30 | 260 |
| Mudharabah | 3.25 | 65 | 127; w=1.27 | 254 |
| Salam | 3.2 | 64 | 125; w=1.25 | 250 |
| Istisna | 3.13 | 62.6 | 122; w=1.22 | 244 |
| Ijara | 2.64 | 52.8 | 102; w=1.02 | 204 |
| Murabahah | 2.56 | 51.2 | 100; w=1 | 200 |

Assumptions: Commitment (C) = \$10,000; EAD = 50% (of C); LGD = 50% (of EAD); Minimum capital requirement = 8%; Weight (w) base = 100; Actual capital requirement = $C \cdot EAD \cdot LGD \cdot W \cdot 8\%$

C commitment, EAD exposure at default, LGD loss given default

Conclusion

- Asset side and liability side unique features of Islamic banks can strengthen linkages between financial and real sectors and enhance financial stability;
- The unique balance sheet features of Islamic banks however, also give rise to significant unique risks;
- The proper management of these risks can strengthen the Islamic banking industry's role in financing development and enhancing financial markets' efficiency and stability

..... Conclusion

- The existing standards which are meant for traditional banks need to be complemented with standards covering the unique risks of Islamic banks
- The challenging role is being played by the Islamic Financial Services Board (IFSB)
- Internal Rating Systems are most suitable for Islamic Banks

Thank You

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