

Issuer Insolvency

Liquidity Stress/Cash Flow Reporting

March 2014

General Problem

Liquidity requests in German Jurisdiction

Discussion of a Polish Version



Liquidity Risk in Cover Pools

- Timely Payment in Case of Insolvency
- Sufficient "in-Cash Flows" to cover Interest and Redemptions
- Going concern or Bankruptcy Costs should be considered
- Sufficient (less liquid) OC does not address Liquidity Risks

Prevention of Cover Pool Illiquidity in case of Bank's Insolvency is a crucial task



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Mixed Approach in Germany

- Minimum of 2% liquid Cover requested
- Minimum of 80% Mortgage Cover requested
- → Extra liquid Cover allowed without Limits
- 180 Day Cash Flow Forecast on a daily basis:
 - Liquidity Gap arises if on any day the consolidated "in Cash Flows" plus available Liquid Cover fall below consolidated due interest and redemption Covered Bond Cash Flows
 - Identified Liquidity Gap has to be closed by additional liquid cover immediately



Discussion of German Approach

- No extension of Maturity Date
- No additional liquid cover for "going concern" costs
- Huge OC is not considered
- Issuance Strategy may be influenced:
 - Maturity Diversification > 180 days
 - Smaller Issuances
 - Callable Issuances



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Key Features of Polish Draft Amendment

- Legal (minimum) OC
- Liquid Assets (Market Value) >=10%
 Outstanding Issuances (Nominal Value)
- Liquid Assets<=15% of registered mortgage receivables
- Excessive Indebtness and Liquidity Tests
- Extension of Maturity Dates
- Switch to Pass Through Structure if Liquidity Test fails



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Key Points Stress Management

- Different Stress Approaches in Covered Bond Community
- Efficient Benchmarking/Calculation of actual Exposures
- Effective Forecasting of Stress Measures
- Automatic Reporting/Monitoring Input to avoid Stress



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