

Diversification and protection of liability holders

2016 Risk and Stochastics Conference

21-22 April 2016, London School of Economics

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- The primary objective of capital adequacy tests, as instruments of microprudential regulation, is the *protection of liability holders*.

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 - ▶ Expected Shortfall (ES) in Swiss Solvency Test and Basel III
- The primary objective of capital adequacy tests, as instruments of microprudential regulation, is the *protection of liability holders*.
- In this presentation we explore the following questions:
 1. What makes an acceptance set be aligned with the “protection of liability holders”? \rightarrow **surplus invariance**
 2. Which acceptance sets satisfy this requirement and are also able to capture diversification? \rightarrow **convexity**

Financial positions and acceptance sets

Capital positions

We consider the standard setting of a simple one-period economy where financial institutions

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$$L^0_+ = \{X \in L^0 ; X \geq 0 \text{ a.s.}\} \quad \text{and} \quad L^0_- = \{X \in L^0 ; X \leq 0 \text{ a.s.}\}$$

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Remark. Instead of L^0 we could also work in L^p with $0 \leq p < \infty$, L^∞ with the weak*-topology (but not with the norm topology), and Orlicz hearts.

Acceptance sets defined

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- A non-empty, proper subset $\mathcal{A} \subsetneq L^0$ is called an *acceptance set* (or *capital adequacy test*) if it is *monotone*, i.e.

$$X \in \mathcal{A}, Y \geq X \implies Y \in \mathcal{A}.$$

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- Acceptance sets that are convex or coherent (convex cones) are important because acceptability is preserved by diversification
 - ▶ The VaR-acceptance set is a non-convex cone and the ES acceptance set is coherent (\rightarrow more on these acceptance sets later)!

Surplus invariance

Acceptability and protection of policyholders

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A capital position X can always be decomposed as

$$X = S_X - D_X$$

where

$$S_X = \max\{X, 0\} = \textit{Surplus} \text{ (benefits owners!)}$$

$$D_X = \max\{-X, 0\} = \textit{Option to default} \text{ (affects liability holders!)}$$

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Consideration. Absence of surplus invariant implies the existence of $X \in \mathcal{A}$ and $Y \notin \mathcal{A}$ although X is worse for liability holders than Y . What makes X acceptable is that it is better than Y for the owners!

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Observation

For an acceptance set $\mathcal{A} \subset L^0$, the following statements are equivalent:

- \mathcal{A} is surplus invariant;
- $X \in \mathcal{A} \implies -D_X \in \mathcal{A}$;
- $\mathcal{A} = \mathcal{D} + L_+^0$ for some solid set $\mathcal{D} \subset L_-^0$. In this case,

$$\mathcal{D} = \mathcal{A} \cap L_-^0 = \{-D_X ; X \in \mathcal{A}\}.$$

Examples of surplus-invariant acceptance sets

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- The VaR_α acceptance set at level $\alpha \in (0, 1)$

$$\mathcal{A} = \{X \in L^0; \text{VaR}_\alpha(X) \leq 0\} = \{X \in L^0; \mathbb{P}(X < 0) \leq \alpha\}$$

where $\text{VaR}_\alpha(X)$ is the negative upper α -quantile of X .

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- The *shortfall-risk* acceptance set at level $c > 0$

$$\mathcal{A} = \{X \in L^0; \mathbb{E}[\lambda(D_X)] \leq c\}$$

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- The *scenario-based* acceptance set

$$\mathcal{A} = \{X \in L^0; 1_A X \geq 0\}$$

where $A \in \mathcal{F}$ is a given set of test scenarios.

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The ES-acceptance set at level $\alpha \in (0, 1)$

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is **not surplus invariant**. Indeed, for every $X \in L^0$ we have

$$\begin{aligned}\text{ES}_\alpha(X) &= \frac{1}{\alpha} \int_0^\alpha \text{VaR}_\beta(X) d\beta \\ &= \frac{1}{\alpha} \int_0^{\mathbb{P}(X < 0)} \text{VaR}_\beta(-D_X) d\beta + \frac{1}{\alpha} \int_{\mathbb{P}(X < 0)}^\alpha \text{VaR}_\beta(S_X) d\beta .\end{aligned}$$

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Consequence. $\text{ES}_\alpha(X)$ depends on the surplus of X whenever $\mathbb{P}(X < 0) < \alpha$ holds.

Default profiles under Expected Shortfall and Value-at-Risk

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Let $0 < \alpha < \beta < 1$ and define

$$\mathcal{D}_\alpha(\text{VaR}) = \{D_X \in L^0; X \text{ is acceptable under VaR at level } \alpha\}$$

$$\mathcal{D}_\beta(\text{ES}) = \{D_X \in L^0; X \text{ is acceptable under ES at level } \beta\}.$$

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Proposition

$$\mathcal{D}_\alpha(\text{VaR}) \subset \mathcal{D}_\beta(\text{ES}) \quad \text{but} \quad \mathcal{D}_\beta(\text{ES}) \not\subset \mathcal{D}_\alpha(\text{VaR}).$$

In particular, for every $D_X \in \mathcal{D}_\alpha(\text{VaR})$ and for every $m \geq 0$ there exists $D_Y \in \mathcal{D}_\beta(\text{ES})$ such that

- (a) $D_Y \geq D_X$;
- (b) $\text{ES}_\beta(Y) \leq -m$.

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- (a) $D_Y \geq D_X$;
- (b) $\text{ES}_\beta(Y) \leq -m$.

Consequence. The Swiss Solvency Test (ES at $\beta = 1\%$) admits worse default profiles than Solvency II (VaR at $\alpha = 0.5\%$)!

Dual representation for convex, surplus invariant acceptance sets

Stability of surplus invariant acceptance sets

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Stability Lemma

Let $\mathcal{A} \subset L^0$ be a closed, surplus-invariant acceptance set and define

$$\mathcal{A}^\infty := \mathcal{A} \cap L^\infty.$$

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Then, the following statements hold:

- (a) $\mathcal{A} = \text{cl}(\mathcal{A}^\infty)$.
- (b) If \mathcal{A} is convex, then \mathcal{A}^∞ is weak*-closed.

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- (a) $\mathcal{A} = \text{cl}(\mathcal{A}^\infty)$.
- (b) If \mathcal{A} is convex, then \mathcal{A}^∞ is weak*-closed.

Remark. This result does not hold if \mathcal{A} is not surplus-invariant.

A useful version of the Hahn-Banach Theorem

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For $\mathcal{C} \subset L^\infty$ define its (lower) support function w.r.t. the weak*-topology $\sigma_{\mathcal{C}} : L^1 \rightarrow \mathbb{R} \cup \{-\infty\}$ by

$$\sigma_{\mathcal{C}}(Z) := \inf_{X \in \mathcal{C}} \mathbb{E}[ZX].$$

The domain of $\sigma_{\mathcal{C}}$ is called the *barrier cone* $b(\mathcal{C})$.

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The domain of $\sigma_{\mathcal{C}}$ is called the *barrier cone* $b(\mathcal{C})$.

Theorem (Hahn-Banach)

Let \mathcal{C} be a nonempty, weak*-closed, convex subset of L^∞ . Then

$$\mathcal{C} = \bigcap_{Z \in b(\mathcal{C})} \{X \in L^\infty; \mathbb{E}[ZX] \geq \sigma_{\mathcal{C}}(Z)\}.$$

Closed, convex, surplus-invariant acceptance sets

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If $\mathcal{A} \subset L^0$ is a surplus-invariant acceptance set, then $b(\mathcal{A}^\infty) \subset L_+^1$ and $\sigma_{\mathcal{A}^\infty}$ is a decreasing map. In particular,

$$\sigma_{\mathcal{A}^\infty}(Z) \leq 0 \quad \text{for all } Z \in L_+^1 .$$

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Dual Representation Theorem

Let $\mathcal{A} \subset L^0$ be a closed, convex, surplus-invariant acceptance set. Then,

$$\mathcal{A} = \bigcap_{Z \in b(\mathcal{A}^\infty) \cap L_+^\infty} \{X \in L^0; -\mathbb{E}[D_X Z] \geq \sigma_{\mathcal{A}^\infty}(Z)\}.$$

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Remark.

- This is a dual representation result in the non locally-convex space L^0 !
- Surplus invariance allows us to take $Z \in b(\mathcal{A}^\infty) \cap L_+^\infty$ instead of L_+^1 and to constrain D_X instead of X !

Sketch of the proof of the Dual Representation Theorem

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Step 1: The set \mathcal{A}^∞ is weak*-closed in L^∞ , hence by the Hahn-Banach theorem cited earlier

$$\begin{aligned}\mathcal{A}^\infty &= \bigcap_{Z \in b(\mathcal{A}^\infty)} \{X \in L^\infty; \mathbb{E}[XZ] \geq \sigma_{\mathcal{A}^\infty}(Z)\} \\ &= \bigcap_{Z \in b(\mathcal{A}^\infty) \cap L_+^\infty} \{X \in L^\infty; -\mathbb{E}[D_X Z] \geq \sigma_{\mathcal{A}^\infty}(Z)\}\end{aligned}$$

where we were able to take $Z \in L_+^\infty$ instead of L_+^1 because $\sigma_{\mathcal{A}^\infty}$ is decreasing and to constrain D_X instead of X because $X \in \mathcal{A}$ if and only if $-D_X \in \mathcal{A}$.

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Step 2: By the Stability Lemma above

$$\mathcal{A} = \text{cl}(\mathcal{A}^\infty) = \bigcap_{Z \in b(\mathcal{A}^\infty) \cap L_+^\infty} \{X \in L^0; -\mathbb{E}[D_X Z] \geq \sigma_{\mathcal{A}^\infty}(Z)\}$$

where we have used that the closure of \mathcal{A}^∞ is defined by the same inequalities by monotone convergence.

The structure of convex, surplus-invariant acceptance sets

Coherent surplus-invariant acceptance sets

We use the notation

$$L^0(A) = \{1_A X; X \in L^0\}, \quad L^0_+(A) = L^0_+ \cap L^0(A) .$$

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Structure Theorem (Coherent Case)

A closed, **coherent** acceptance set $\mathcal{A} \subset L^0$ is surplus invariant if and only if there exists $A \in \mathcal{F}$ with $\mathbb{P}(A) > 0$ such that

$$\mathcal{A} = L_+^0(A) \oplus L^0(A^c) = \{X \in L^0; 1_A X \geq 0\}.$$

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Interpretation. Under the above conditions, we have

$$\text{surplus invariance} \iff \begin{cases} \text{no default on } A \\ \text{no constraints on } A^c \end{cases}$$

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A closed, **convex** acceptance set $\mathcal{A} \subset L^0$ is surplus invariant if and only if there exists a measurable partition $\{A, B, C\}$ of Ω with $\mathbb{P}(C) < 1$ (unique up to sets of zero probability) and $X^* \in L_-^0$ such that

$$\mathcal{A} = L_+^0(A) \oplus (\mathcal{D} + L_+^0(B)) \oplus L^0(C),$$

where \mathcal{D} is a closed, convex, solid subset of $L_-^0(B)$ such that

$$\text{VaR}_\alpha[X] \leq \text{VaR}_\alpha[X^*] \quad \text{for every } X \in \mathcal{D} \text{ and every } \alpha \in (0, 1) .$$

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Step 1: From the Dual Representation Theorem we know that

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Using an exhaustion argument à la Yan (1980) one proves that there exists a set $C \in \mathcal{F}$ with $\mathbb{P}(C) < 1$ such that

- (a) $Z = 0$ a.s. on C for every $Z \in b(\mathcal{A}^\infty)$,
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Then elements in \mathcal{A} must be positive on A !

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To conclude the proof use the equivalences

- (a) \mathcal{D} is bounded in probability
- (b) \mathcal{D} is stochastically bounded from below
- (c) there exists $X^* \in L^0$ such that

$$\text{VaR}_\alpha[X] \leq \text{VaR}_\alpha[X^*] \quad \text{for every } X \in \mathcal{D} \text{ and every } \alpha \in (0, 1) .$$

Conclusion

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 - ▶ if a position is unacceptable, then no position that is worse for liability holders should be acceptable
- From the two most widely used capital adequacy tests, those based on VaR are surplus invariant, but those based on ES are not
 - ▶ this does not invalidate the known problems with VaR (i.e. lack of convexity and tail blindness)!

Concluding comments (2/2)

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- The set of convex, surplus-invariant tests is richer but still limited since the default options on the set where default is constrained must belong to a set that is bounded (in probability)
- Surplus invariance severely limits the choice of capital adequacy tests that give credit for diversification
 - ▶ when choosing an acceptability criterion a tradeoff must be made between competing, reasonable requirements

Capital adequacy tests and limited liability of financial institutions

Koch-Medina, Moreno-Bromberg, Munari, *Journal of Banking & Finance*, 51, 93-102, (2015)

Diversification, protection of liability holders and regulatory arbitrage

Koch-Medina, Munari, Šikić, *Mathematics and Financial Economics*, forthcoming (2016)

Unexpected shortfalls of Expected Shortfall: Extreme default profiles and regulatory arbitrage

Koch-Medina, Munari, *Journal of Banking & Finance*, 62, 141-151, (2016)

Thank you for your attention!