# Feedback on the Proposed Reporting Standard ARS 220.0 - Credit Exposures and Provisions

Use of this template is optional. Respondents may choose to use it to provide structured feedback on the proposed reporting standard.

#### General Feedback

[Please provide any general feedback regarding the collection, for example timeframes, application, confidentiality of data and allocation of provisions in this section. Please also indicate if all or part of the submission is to remain in confidence.]

#### Specific Feedback

#### Table 1: Exposures and provisions

#### Scope Feedback

[Please provide any feedback regarding the scope of the table in this section]

#### Field by Field Feedback

[Please provide any feedback regarding specific data requirements in the table below, please include any feedback regarding ability to deliver and definitions in this section. It is not necessary to provide feedback for all data elements]

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Name** | **Description** | **Feedback** |
| 1 | Loan identifier | Report the loan identifier. This should be a unique identifier assigned by the lender for each individual loan. It must not include any personal details such as names, addresses or date of birth.  The loan identifier should be consistent across collections. |  |
| 2 | ***On/off balance sheet*** | Report whether the exposure is ***on-*** or ***off-balance sheet***. |  |
| 3 | IRB asset class | Report the IRB asset class.  Non-IRB ADIs or those not seeking IRB approval should report *not applicable*. |  |
| 4 | Standardised asset class | Report the standardised asset class. |  |
| 5 | Degree of performance | Report the degree of performance. |  |
| 6 | Impairment stage | Report the impairment stage for the current ***reporting period***. |  |
| 7 | Restructure | Report whether the exposure is ***restructured***. |  |
| 8 | Security | Report the exposure’s security category. |  |
| 9 | Number of days ***past due*** | Report the number of days ***past due***. |  |
| 10 | ***Geography*** | Report the ***geography*** of the exposure.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 11 | Counterparty | Report the ***SESCA classification*** of the counterparty to the exposure.  Refers to the SESCA sector, subsector, group, or class of the counterparty to the exposure as applicable. Report the most detailed level possible. If the subsector, group or class cannot be determined, aggregate the exposures to the parent hierarchy.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 12 | Residency | Report the counterparty’s residency. |  |
| 13 | Repayment type | Report the repayment type.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 14 | ***ANZSIC*** | Report the ***ANZSIC*** code of the exposure.  If the ANZSIC category cannot be determined or if the counterparty covers multiple categories, aggregate the relevant exposures to the parent hierarchy. For example, if a counterparty covers multiple ANZSIC classes, report the ANZSIC group.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 15 | Prescribed provisioning category | Report the prescribed provisioning category.  Non-Prescribed provisioning ADIs should report *not applicable*. |  |
| 16 | Security type | Report the security type. |  |
| 17 | Interest rate type | Report the interest rate type.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 18 | Origination channel | Report the origination channel.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 19 | ***Currency*** | Report the ***currency*** of the exposure.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 20 | Booking country | Report the ***country of domicile*** of the exposure.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 21 | ***Origination date*** | Report the ***origination date*** of the exposure.  If the origination date is not known, or not clear; use the date the current loan expiry date was approved. |  |
| 22 | Maturity date | Report the contractual maturity date of the exposure. |  |
| 23 | Gross carrying amount of credit exposures | Report the ***gross carrying amount of credit exposures***. |  |
| 24 | Drawn amount | Report the drawn amount. |  |
| 25 | Prescribed provisioning adjusted balance | Report the ***prescribed provisioning adjusted balance***.  Prescribed provisioning ADIs should report *0*. |  |
| 26 | Portfolio-allocated provisions (pro rata) | Report the value of portfolio-allocated provisions. |  |
| 27 | Allocated provisions | Report the value of provisions that have been allocated at a loan level. |  |
| 28 | Credit RWA | Report the value of ***credit risk-weighted assets***. |  |
| 29 | Reconciliation balance | Report Y if the line is for a reconciliation balance, N otherwise. |  |

#### Table 2: Exposures and value adjustments

#### Scope Feedback

[Please provide any feedback regarding the scope of the table in this section]

#### Field by Field Feedback

[Please provide any feedback regarding specific data requirements in the table below, please include any feedback regarding ability to deliver and definitions in this section. It is not necessary to provide feedback for all data elements]

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Name** | **Description** | **Feedback** |
| 1 | Loan identifier | Report the loan identifier. This should be a unique identifier assigned by the lender for each individual loan. It must not include any personal details such as names, addresses or date of birth.  The loan identifier should be consistent across collections. |  |
| 2 | ***On/off balance sheet*** | Report whether the exposure is ***on-*** or ***off-balance sheet***. |  |
| 3 | IRB asset class | Report the IRB asset class.  Non-IRB ADIs or those not seeking IRB approval should report *not applicable*. |  |
| 4 | Standardised asset class | Report the standardised asset class.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 5 | Degree of performance | Report the degree of performance. |  |
| 6 | Restructure | Report whether the exposure is ***restructured***. |  |
| 7 | Security | Report the exposure’s security category. |  |
| 8 | Number of days ***past due*** | Report the number of days ***past due***. |  |
| 9 | ***Geography*** | Report the ***geography*** of the exposure.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 10 | Counterparty | Report the ***SESCA classification*** of the counterparty to the exposure.  Refers to the SESCA sector, subsector, group, or class of the counterparty to the exposure as applicable. Report the most detailed level possible. If the subsector, group or class cannot be determined, aggregate the exposures to the parent hierarchy.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 11 | Residency | Report the counterparty’s residency.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 12 | Repayment type | Report the repayment type.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 13 | ***ANZSIC*** | Report the ***ANZSIC*** code of the exposure.  If the ANZSIC category cannot be determined or if the counterparty covers multiple categories, aggregate the relevant exposures to the parent hierarchy. For example, if a counterparty covers multiple ANZSIC classes, report the ANZSIC group.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 14 | Security type | Report the security type.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 15 | Interest rate type | Report the interest rate type.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 16 | Origination channel | Report the origination channel.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 17 | ***Currency*** | Report the ***currency*** of the exposure.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 18 | Booking country | Report the ***country of domicile*** of the exposure.  Prescribed provisioning ADIs should report *not applicable*. |  |
| 19 | Origination date | Report the origination date of the exposure.  If the origination date is not known, or not clear; use the date the current loan expiry date was approved. |  |
| 20 | Maturity date | Report the contractual maturity date of the exposure. |  |
| 21 | Gross carrying amount of credit exposures at fair value | Report the ***gross carrying amount of credit exposures at fair value***. |  |
| 22 | Valuation adjustment | Report the ***prescribed provisioning adjusted balance***.  ADIs that do not use the prescribed provisioning approach should report the drawn amount in this column. |  |
| 23 | Drawn amount | Report the drawn amount. |  |
| 24 | Credit RWA | Report the value of ***credit risk-weighted assets***. |  |
| 29 | Reconciliation balance | Report Y if the line is for a reconciliation balance, N otherwise. |  |

#### Table 3: Movements in exposures and provisions

#### Scope Feedback

[Please provide any feedback regarding the scope of the table in this section]

#### Field by Field Feedback

[Please provide any feedback regarding specific data requirements in the table below, please include any feedback regarding ability to deliver and definitions in this section. It is not necessary to provide feedback for all data elements]

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Name** | **Description** | **Feedback** |
| 1 | Impairment stage | The impairment stage for the current ***reporting period***. |  |
| 2 | Reason for movement | The reason for movement. |  |
| 3 | IRB asset class | Report the IRB asset class.  Non-IRB ADIs or those not seeking IRB approval should report *not applicable*. |  |
| 4 | Standardised asset class | Report the standardised asset class.  All other ADIs should report *not applicable*. |  |
| 5 | Movement in gross carrying amount of credit exposures | The movement in ***the gross carrying amount of credit exposures***. |  |
| 6 | Movement in drawn amount | The movement in the drawn amount. |  |
| 7 | Movement in provisions | The movement in ***provisions***. |  |