

評等準則 | 金融機構 | 意見徵詢： 銀行業國家風險評估方法論與假設

June 8, 2021

摘要與適用範圍

1. 本擬定準則說明的是標普全球評級（S&P Global Ratings）決定銀行業國家風險評估（BICRA）的方法論。
2. 本準則涵蓋了2011年2月16日發佈之「Principles of Credit Ratings（信用評等之基本原則）」下的特定方法與假設。
3. 本準則適用於已經或將被授予金融機構（FI）發行體信用評等（ICR）的所有銀行系統。

擬對前版準則提出之變動

4. 擬提出之準則：

- 與現行架構下以初始評分與接著進行的各項調整來得出每項經濟風險與產業風險因素最終分數的計算方法不同，再一次性考量所有子因素來得到經濟風險與產業風險因素的評分。
- 將更多經濟與產業特色涵蓋入內，以反映特定經濟或金融服務產業的特性。
- 移除調整使用頻率的百分比限制。
- 與現行將主權分析結果納入我們的BICRA分析中的方式不同，提議用一次性考量的分式進行分析。
- 在我們的BICRA分析中更明確地強調我們在何處發現網路風險、技術創新，以及與環境、社會和治理（ESG）因素相關的新興風險。
- 當房地產市場並非經濟失衡的潛在原因時使用替代指標評估出經濟失衡的初始評分。
- 說明對經濟失衡分析中修正階段進行的評估。
- 在評估競爭動態時，不再將銀行業與其他產業的獲利能力比較視為風險偏好的一項關鍵指標。

對流通在外評等之影響

5. 在本擬定準則的規範下，我們認為BICRA分數變動對我們所授予的ICR所產生的影響將微乎其微。根據我們的測試，大約2%的BICRA會改變，可能的變動至多在一個評等級別。不過我們預期對產業風險評分所產生的影響將較大，而且我們認為至多可能會有10%的產業風險評分將向上或向下調整。根據我們的測試，在假設受評金融機構維持其目前信用特性的前提下，僅有低於5%的ICR可能受到本擬定準則的影響，我們預估其中大多數受影響的ICR變動幅度將不會超過一個級距。

重要發佈日期

- 首次發佈日期：2021年6月8日。
- 回覆截止日期：2021年7月20日。
- 生效日期：自最終版準則發布日起立即生效，惟需在當地登記的司法管轄區除外。在前述司法管轄區中，本準則唯有在完成當地登記流程後始得生效。
- 若本擬定準則獲採用，將取代本文文末「Criteria To Be Fully Superseded（即將汰換之準則）」一節中所列出的準則文章。

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- 此處提供之中文版內容係翻譯自英文版摘要章節。

問題

6. 標普全球評級除了要徵求對本建議準則的一般性或特定評論意見外，同時也希望能就以下問題向業界徵求回應看法：

- 請問您對我們在本文中提出的方法論建議的整體看法為何？
- 請問您是否認為本擬定準則還有任何其他因素須納入考量？
- 請問您認為本建議準則是否有任何明顯的重覆或遺漏之處？
- 請問您認為本建議準則的內容與準則結構清楚嗎？如果不是，為什麼？
- 請問您是否認為本架構過分強調任何特定的信用因素？如果是，請問您是否認為可透過調整改善？
- 請問您是否認為我們適當地辨識風險且同意我們所建議的風險評估方法？如果不是，請問您會建議何種替代方式？

回覆截止日期

7. 我們建議有興趣的市場參與人士在 2021 年 7 月 20 日前，就本項建議準則在
<https://disclosure.spglobal.com/ratings/en/regulatory/ratings-criteria/-/articles/criteria/requests-for-comment/filter/all> 提交書面意見，參與人士必須從既有的「意見徵詢（Requests for Comment）」列表中做一選擇以啟動上傳程序

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