



FEATURE

COVID-19 potential implications for the banking and capital markets sector

Maintaining business and operational resilience

Scott Baret, Anna Celner, Monica O'Reilly, and Mark Shilling

FROM THE DELOITTE CENTER FOR FINANCIAL SERVICES

Learn what questions banking and capital markets leaders should be asking themselves right now and what action steps they should consider in the face of COVID-19.

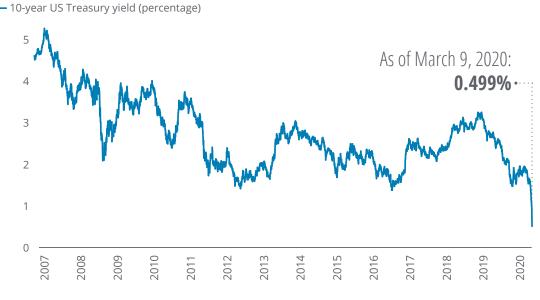
OVID-19'S IMPACT ON individuals, communities, and organizations is rapidly evolving. A recent Deloitte Insights article posited four different scenarios for the global economy resulting from COVID-19, which ranged from a mild and temporary hit to the worst-case scenario, a global financial crisis.¹ Unfortunately, COVID-19 arrived when the global economy was already showing signs of a slowdown.²

In addition to the effects on the supply and demand side, COVID-19 has already jolted financial markets. Since February 21, 2020, bond yields, oil, and equity prices have sharply fallen, and trillions of dollars, across almost all asset classes, have sought safety. In the United States, 10-year bond yields have tumbled below 0.5 percent³ (figure 1), and equity prices on major stock indices around the world have fallen. It appears, as of now, that the markets are trying to price using the worst-case scenario, which has increased volatility recently (figure 2).

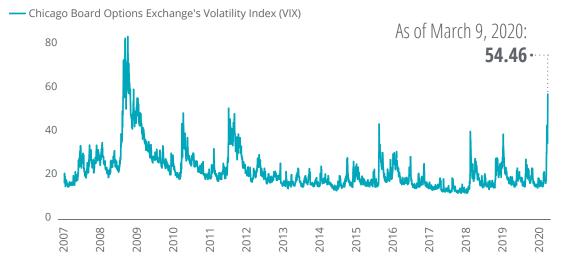
With ongoing shocks to the supply and demand side, there is potential for further market disruption. Institutions and individuals may be experiencing liquidity stress, including limited access to credit. This might, in turn, increase the probability of default, especially near or in the speculative grade of corporate debt. Private debt, including corporate and household debt, has reached record levels recently, and approximately one-half of the investment-grade market currently holds a triple-B rating.⁴

FIGURE 1

The 10-year US Treasury yield has been falling to record-low levels



Source: Federal Reserve Bank of St. Louis.



The VIX, a measure of the stock market's expectation of volatility based on S&P 500 index options, has risen significantly

Source: Federal Reserve Bank of St. Louis.

Central banks around the world, meanwhile, have already proactively intervened to calm markets and show commitment to using all possible measures. In its first emergency move since the recession in 2008, the US Federal Reserve (the Fed) recently cut the federal funds rate by 50 basis points.⁵ The Fed has also actively intervened in the repo market to add further liquidity.⁶ The Bank of Japan (BoJ), meanwhile, issued an emergency statement signaling that it would inject liquidity into the market by increasing asset purchases.7 The People's Bank of China (PBOC) has also pumped more than US\$240 billion of liquidity into the financial system as a countermeasure to the virus.8 Additionally, the Bank of England and the European Central Bank (ECB) have announced various plans to counter COVID-19 in the coming days.9

But as the situation develops, more action may be required by central banks, regulators, and governments, which would necessitate quick coordination at the national and international levels. Meanwhile, banking and capital markets firms around the world are mobilizing and taking steps to minimize COVID-19's effects on day-to-day operations. Firms are testing and implementing business continuity/contingency plans, which include alternate workplace arrangements such as split work sites, working from home, and rotating shifts for all types of employees, even traders.¹⁰ Many have also instituted universal travel bans beyond the countries experiencing the most severe effects, and have canceled large events. Institutions have also heightened measures to ensure the safety and health of their employees through various means. Banks have also requested that regulators ease capital requirements.¹¹ Some regulators, such as the US Securities and Exchange Commission (SEC), have proactively granted relief for regulatory financial reporting to companies affected by COVID-19.12

Many banks are also acting as responsible citizens by extending loans to hard-hit borrowers, renegotiating credit terms, and even donating face masks to their clients.¹³ Beyond the operational actions already underway, banks and capital markets must remain hypervigilant. They need to also actively consider the short- and medium-term financial, risk, and regulatory compliance implications that are resulting from the continuing uncertainty around COVID-19.

This article explores these implications. It also raises questions around key areas that banking and capital markets leaders should be asking themselves right now and provides action steps for them to consider.

Of course, any actions taken will depend on the specific context of the organization and its unique

circumstances regarding exposure to the virus. Also, organizational priorities may change dramatically depending on how the situation develops.

We do not know the long-term implications of COVID-19 for financial markets and banking and capital markets firms. But when normalcy returns, banks and capital markets firms will likely have learned a few lessons. These may include how to best retain operational resilience when confronted with future pandemics, and possibly how to design new operating models such as alternate work arrangements. COVID-19 may further accelerate migration to digital channels and connectivity.

Specific implications for banking and capital markets firms

FIGURE 3

Operational resilience

Topic/ issue	Current and potential developments	Relevant questions	Actions banks and capital markets firms should consider
Branch/ ATM operations	 As the pandemic advances, some branches/offices may need to close temporarily, or employees may not want to come in to work. ATMs may need to remain open and have enough cash to dispense. 	 How can banks ensure operational consistency with branch/office operations if there are temporary closings or employee absences? How can branches sufficiently replenish cash for ATMs? 	 Consider reducing branch hours or, if possible, utilizing only drive-through operations. Assess opportunities to deliver services solely through digital channels.
Trade compliance	 Many institutions already have traders working from home and remote offices, and some regulators such as the Financial Industry Regulatory Authority (FINRA) have temporarily waived rules in this regard. Meanwhile, the United Kingdom's Financial Conduct Authority (FCA) has stated that all firms are expected to meet their regulatory compliance obligations regarding trading orders transactions, timely entry of orders, using recorded lines, and giving staff access to compliance support. 	 What flexibility might regulators grant that would enable traders to work from home? What systems/tools/support need to be provided to traders who may be forced to work from home? 	 Be in close contact with industry groups, such as the Securities Industry and Financial Markets Association (SIFMA), and regulators, such as the Commodities Futures Trading Commission (CFTC), National Futures Association, and the FCA, for information and updates on obtaining waivers. Work with vendors to set up alternate recording options.

Sources: Rachel Louise Ensign, Liz Hoffman, and Justin Baer, "Wall Street scrambles to harden virus defenses," *Wall Street Journal*, March 1, 2020; Pete Schroeder and Michelle Price, "Wall Street regulator paves way for home trading as coronavirus spreads," Reuters, March 9, 2020; Laura Noonan, Nicholas Mcgaw, and Primrose Riordan, "Banks seek trading rule guidance as coronavirus spreads," *Financial Times*, March 6, 2020.

Topic/issue Current and potential developments Relevant questions • The Federal Reserve has intervened in the repo market Liquidity • If there is a liquidity crunch, what current plans management to ensure adequate market liquidity. and activation steps are in place? To what • The ECB, BoJ, and PBOC have taken a variety of actions degree have they been reassessed in light of recent market conditions? to ensure market liquidity. If institutions needed to sell assets to cover Some institutions' contingency funding plans (CFPs) may liquidity shortfalls, are the requisite legal have already been invoked. And due to market volatility, documents up to date? there could be big swings in stress testing results and limit/threshold breaches. Some market participants may already be experiencing increased liquidity tightening. Capital • Risk-weighted assets (RWA) may be impacted by higher · How do increased volatility and price charges from increased volatility levels and higher management movements of assets affect RWA? counterparty risks. Does the current economic and market • With the implementation of Current Expected Credit environment warrant additional stress testing? Losses (CECL) and a potentially less favorable economic How severe would a worst-case scenario be? outlook, banks' loss allowances may be negatively • With changes in economic assumptions, how impacted. Also, borrowers may want to refinance at will loan loss allowance estimates change? longer maturities to lock in lower interest rates. Under CECL, this could result in additional loss allowances. If general economic conditions deteriorate and lead to · Do leaders know where potential revenue Revenue and cost • lower GDP growth, there could be reduced demand for management losses could be the steepest? banking products and services. · With potential declines to net interest income, With central banks aggressively cutting interest rates, what options exist to boost noninterest income? banks' net interest income will likely be challenged. Loan book, • With clients potentially experiencing stressed financial · How can firms best assess and proactively work conditions, credit quality/ratings may be affected. with clients who may be affected by the virus to covenants, and exception renegotiate loan terms and conditions? • Also, pledged collateral may experience a decline in management • Are borrowers/clients at risk of violating loan value. covenants? Is there an exception management • Customers, both retail and institutional, may resort to process in place? minimal or delayed payments on their loan balances. · Will firms need to increase loan loss provisions? Trading/hedging • Currently, increased volatility and decline in prices How can capital allocations be determined strategies across many asset classes have impacted the trading across trading books in stressed markets? books and increased market risk as well as counterparty Are precautionary steps, such as trading asset credit risk. divestments, required, and if so, which assets could be disposed of first? How quickly can hedging strategies be adjusted across foreign exchange, commodities, equities, or fixed income, as the situation develops?

Financial and business impacts

Sources: Federal Reserve Bank of St. Louis, "Overnight repurchase agreements: Treasury Securities purchased by the Federal Reserve in the temporary open market operations," accessed March 9, 2020; European Central Bank, "Statement by the president of the ECB," March 2, 2020; John Ainger and Anooja Debnath, "Investors dodging market meltdown say they can't find liquidity," Bloomberg, March 9, 2020; Sohini Chowdhury and Cristian deRitis, "Beyond theory: A practical guide to using economic forecasts for CECL estimates," Moody's Analytics, August 2018; Laurent Birade, "CECL: Credit cards and lifetime estimation—a reasonable approach," Moody's Analytics, September 2018; David Enrich, James B. Stewart, and Matt Phillips, "Spiraling virus fears are causing financial carnage," *New York Times*, March 6, 2020.

- Adequate liquidity across the enterprise globally should be ensured. Banks should be closely reviewing and monitoring daily liquidity stress testing reporting, limit/threshold monitoring, liquidity coverage ratio (LCR) results, etc. They should be monitoring market activity against their liquidity stress indicators for triggers that would activate the CFP.
- Analyses should be conducted to determine the size and impact of any liquidity shortfall if liquidity stress indicators are being triggered regularly. Impacts to secured funding/asset sales (including market access) should be included in the analysis. This information should be presented to management across liquidity and liquidity risk (liquidity crisis team) as part of the CFP being activated.
- Liquidity preservation actions should be part of banks' CFPs and would include options for ensuring liquidity if the CFP has been invoked.
- · Requirements should be recalibrated based on emerging market conditions and likely future scenarios.
- Banks should go beyond the LCR requirements when communicating their liquidity status to regulators. Regulatory relations teams should be part of the liquidity crisis management team/committee under the CFP.
- Assumptions driving the valuation of asset values should be revisited.
- Additional stress tests with different underlying scenarios specific to COVID-19 should be conducted.

- Work with relevant departments and units globally to develop an understanding of potential revenue hits and outline steps for mitigation.
- Find out which sectors/regions/clients are most at risk.
- · Reach out to clients with communications and information requests to provide temporary help as appropriate.
- Loan loss provisions under different economic scenarios should be reexamined.

· Capital allocations and hedging strategies across trading books should be revisited.

Risk and controls

Topic/issue	Current and potential developments	Relevant questions
Market risk	 A sharp drop in interest rates and increased volatility in securities and FX prices increase banks' market risk, potentially leading to losses. 	 Has the exposure of the institution's earnings or economic value of capital been adversely affected, and is it materially different from model-implied scenarios? Does the current environment warrant an update of internal models?
Counterparty credit risk	Recent market events may have affected counterparties' credit profile.	 How should any potential changes to counterparty creditworthiness be addressed in existing contracts and arrangements? How are market intermediaries, such as clearing agents, responding to any decline in counterparty credit standing?
Nonfinancial risks	 Nonfinancial risks such as conduct risk/culture, model risk, third-party risk, and cyber risk may also become more pressing. Potential disruptions to trading infrastructure may require that trades be rerouted to other venues, locations, and countries. 	 How can risk controls regarding conduct risk be upheld in alternate work arrangements? To what degree are recent market conditions impacting model risk? What would regulatory requirements look like under alternate trade routing? As business process and flows change, what is the best way to manage cyber risk?
Risk governance	 If a bank's operating model needs to change, it may become difficult for the board of directors to continue to meet governance obligations such as overseeing risk, providing credible challenge to management, and acting as responsible stewards of the organization. 	 How should the board of directors adapt its governance?
Dividends and stock buybacks	 Banks have been returning capital to shareholders in the form of dividends and share buybacks over the past few years. Recent market stress may put liquidity pressure on banks, which may want to preserve capital by halting or reducing dividends and share buybacks. 	 What is the appropriate strategy for dividends and buybacks, given current liquidity preferences? If there are commitments in place about dividends and/or stock buybacks, and banks want to temporarily halt these actions, how should this be communicated to shareholders?
Credit ratings	 The COVID-19-induced market environment may negatively impact banks' credit rating profile. New systemic, country, or other business risk factors may intensify and affect the creditworthiness of banks, counterparties, and borrowers, especially in the high- yield grade. 	 How are rating agencies accounting for the changes to these risk factors? How should any potential changes to the credit profiles of counterparties and borrowers resulting from COVID-19 be accounted for?
LIBOR transition	• LIBOR will be replaced with alternative reference rates in various jurisdictions by 2021.	• Does the current market disruption impact transition plans and timing to replace LIBOR?

Sources: Laura Noonan, Nicholas Mcgaw, and Primrose Riordan, "Banks seek trading rule guidance as coronavirus spreads," *Financial Times*, March 6, 2020; Alexandra Dimitrijevic and Paul F. Gruenwald, "Coronavirus casts shadow over credit outlook," S&P Global Ratings, February 11, 2020; Sinead Cruise and Lawrence White, "The end of Libor: the biggest banking challenge you've never heard of," Reuters, October 8, 2019.

- Revisit internal models capturing market risk and account for potentially higher correlation.
- · Communicate with the regulator if capital is adversely affected and materially differs from model-implied scenarios.

• Assess/revisit existing contracts with counterparties most at risk.

- · Work with market intermediaries to stay informed about any changes to counterparties' standing.
- Rethink risk controls for alternate work arrangements and potential disruptions that could warrant a reassessment of conduct risk, cyber risk, and third-party risk.
- · Revisit to what extent model assumptions reflect current and possibly future market conditions.
- Obtain clarity from regulators about alternate trade routing.
- Management should err on the side of overcommunicating with the board of directors, keeping them apprised and seeking their guidance on alternate operating procedures.
- Flexibility in work arrangements and speed of decision-making among the board of directors could become paramount in these circumstances.
- Assess institutional shareholder interest and preferences for share buybacks and dividends and communicate any potential changes.
- Stay in active communication with rating agencies and apprise them of changes to the credit standing.
- Determine whether any rating actions flowing from COVID-19-induced stress would necessitate giving counterparties and borrowers some slack.
- Stay abreast of regulators' guidance and market developments in the alternate reference rate markets, such as the Secured Overnight Financing Rate (SOFR) in the United States.

General implications for banks and capital markets firms

FIGURE 6

Operational resilience

Topic/issue	Current and potential developments	Relevant questions
COVID-19 crisis readiness	 COVID-19 is disrupting the operations of many banks and capital markets firms globally. Financial institutions have already taken a number of actions, but they may need to do more as the situation evolves. 	 Has a comprehensive reassessment of exposure to the full vectors of threat been done? How is the playbook for pandemics being updated as a result of unfolding events? What is the best way to determine the appropriate organizational response? How is the COVID-19 task force empowered?
Communications	• Communicating regularly with various stakeholders may continue to grow in importance.	 How quickly can tailored communications be initiated with employees, customers, business partners, vendors, investors, regulators, etc., across offices, regions, and businesses, nationally and internationally?
Monitoring and review	 The evolving developments regarding COVID-19 call for institutions to be agile/ flexible. 	 Is scenario planning being done proactively? Are plans, policies, and procedures adaptive and flexible, and are they in line with national and local regulations and laws? Is there a clear governance mechanism in place if the pandemic worsens?
Flex and remote work	 As the situation continues to rapidly develop, alternate work arrangements are being implemented to limit the spread of the illness and ensure employee safety. 	 What flex and remote work policies are currently in place? For those with business models that preclude remote work arrangements, have flexible or rotating schedules been considered? What are the risks associated with remote work? Do organizations have tools and solutions to implement remote work?
Infrastructure/ capacity	 To enable flexible or remote work, organizations need to have the right infrastructure in place. 	 Is the necessary technical infrastructure in place to support alternate work arrangements, and how secure is it? Which existing tools could enable remote work collaboration?
Quality of work/ productivity and employee well-being	 The spread of COVID-19 could result in further work disruptions and delays, as governments, public transportation agencies, and educational institutions adjust their practices and policies. 	 How can organizations ensure that the quality of work and productivity remain high? How can organizations ensure they are nimble enough to adjust workflows if work needs to be reprioritized? How can they modify plans to sustain employee engagement, well-being, and motivation?

- Banks and capital markets firms should reexamine their crisis readiness, run tests, reexamine governance, and streamline decision-making and communication approaches.
- Determine what constitutes a proportionate response and encourage decisive action.
- Playbooks already in place should be reviewed with necessary updates made to ensure organizational resilience.
- · Activation and deactivation triggers should be determined and continuity procedures reviewed.
- The COVID-19 task force should be empowered to make decisions at both the global and local level, where applicable. The task force should be connected to and actively align its priorities with the CEO and board of directors.
- Ensure empathetic responses to employees' situations.
- · Appropriate communication mechanisms tailored to different audiences should be prepared and tested.
- Consider testing preparedness using interactive, scalable crisis exercises.
- Actively monitor results and iterate as needed.
- Ensure that policies, procedures, and plans are in line with current local, state, and national laws, and any updates. These may include Leave of Absence (LOA), the Americans with Disabilities Act (ADA), the Family and Medical Leave Act (FMLA), the right to privacy, Occupational Safety and Health Administration regulations, National Labor Relations Act regulations, state safe environment laws, and discrimination laws.
- Based on the most up-to-date information, whenever possible, consider instituting work-from-home or flexible/rotating schedules.
- Ensure that technology options are in place to connect employees working remotely without compromising access/data security.
- Review infrastructure that is currently in place, such as VPN connections, security tokens, bandwidth, and laptops.
- Prioritize which projects, workflows, and deliverables matter most, and communicate these clearly to employees.
- Provide appropriate tools and employ relevant tactics to maintain quality of work/productivity.

Continued >

Operational resilience (continued)

Topic/issue	Current and potential developments	Relevant questions
Offshore delivery centers	 Many organizations have offshore delivery centers, from IT services to call centers. 	 How can firms ensure delivery from offshore centers with minimal disruption? Are there alternate/secondary delivery options in case the offshore delivery center is compromised? What is the business continuity plan for offshore centers?
Global operations	 Each market could experience varying levels of stress and disruption. 	 How efficiently can critical activities be rerouted to local offices around the world? How resilient are global entities/offices operationally?
Digital/IT infrastructure	 There may be increased demands on organizations' digital infrastructure to replace manual operations. 	 Are digital banking, payments, trading platforms, and other systems robust and resilient enough to handle disruption?
Legal matters	 At any institution, legal contracts that deal with labor, clients, counterparties, and/or vendors, may be at risk. 	 Are there any work/projects/deliverables that are at risk of missing deadlines or not being fulfilled? What are the third-party and client implications?
Tax, financial, and regulatory compliance reporting	 Looming deadlines for tax filings, financial reporting, and regulatory compliance reporting may be jeopardized due to operational disruptions. There may be tax implications as employees work remotely, potentially in different cities or states. 	 How would changes to operations and alternate work arrangements or reduced capacity affect tax filings, financial reporting, and regulatory compliance reporting? What are the tax implications from work being done remotely? What would the potential losses be for tax-loss carry forwards?

Source: Deloitte analysis.

- Maintain frequent communication with offshore delivery centers and develop appropriate contingency plans if they are not yet in place.
- Consider testing alternate work arrangements from offshore delivery centers to determine if service performance is affected in any way.
- Find alternate venues for service delivery if a particular center experiences an operational disruption.
- Identify which operations and/or activities can be rerouted or sent to other global offices, or even third parties.
- · Consider testing and planning for alternate capacity to process and continue to deliver services whenever possible.
- Confirm if existing contracts include *force majeure* clauses.
- Contracts or statements of work should be revisited or amended, whenever possible.
- Be realistic about meeting deadlines. Proactively communicate with tax authorities and regulators, such as the SEC or OCC in the United States, or the ECB, Bank of England, and local tax authorities in Europe.
- Gain an understanding of the tax implications.

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About the authors

Scott Baret | sbaret@deloitte.com

Scott Baret is a vice chairman of Deloitte LLP and the leader of Deloitte's US Banking & Capital Markets practice, which provides a broad spectrum of services to each of the banks and capital market firms listed on the Fortune 500. Baret leads the overall strategic direction of the sector as well as its go-to-market strategies and resources. He has more than 25 years of experience working with Deloitte's largest US and international banking and capital markets clients and has led a number of global projects focused on assessing, improving, and transforming the way senior management, boards, and the broader organization approach governance, regulation, and risk management across the enterprise.

Mark Shilling | mshilling@deloitte.com

Mark Shilling is Deloitte Consulting's US practice leader for the Banking & Capital Markets industry. In this role, he is responsible for strategy, technology, operations, and human capital services to global and regional clients, along with fintech and emerging ecosystem players. Shilling brings more than 20 years of experience advising clients in large-scale/global programs to drive efficiency and effectiveness in core areas of cost reduction, operational risk, performance management, asset efficiency, and regulatory reporting.

Anna Celner | acelner@deloitte.ch

Anna Celner is the Global Banking & Capital Markets practice leader for DTTL, the Deloitte Global firm, with the responsibility for setting and executing global banking strategy. In this role, she leads strategic client portfolio, go-to-market strategy, and the coordination of Deloitte's global network to help banking clients address their strategic priorities and respond to regulatory, technology, and growth challenges. She is also responsible for managing the global relationships of the Swiss firm and bringing the power of Deloitte's global expertise and insights to Swiss clients. Celner is a vice chairman of Deloitte UK and the global lead client service partner for a major financial services organization. She has been a member of the Swiss executive team since 2010 and has more than 25 years of experience serving global financial services institutions in Europe and the United States.

Monica O'Reilly | monoreilly@deloitte.com

Monica O'Reilly is the Financial Services industry leader for Deloitte Risk and Financial Advisory and has more than 20 years of experience in risk management, regulatory compliance, and controls consulting. In her role, she is responsible for market growth, solution development, and service delivery nationally. O'Reilly has an in-depth knowledge of the banking industry with a specific focus on payments. She has worked with many clients in the industry to assess compliance with applicable laws and regulations across various geographies, as well as enterprise and operational risk management capabilities.

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Scott Baret

Vice chairman | US Banking & Capital Markets leader | Deloitte & Touche LLP 1 908 902 1383 | sbaret@deloitte.com

Scott Baret is a vice chairman of Deloitte LLP and the leader of Deloitte's US Banking & Capital Markets practice, which provides a broad spectrum of services to each of the banks and capital market firms listed on the Fortune 500.

Anna Celner

Global Banking & Capital Markets practice leader | Deloitte Consulting Switzerland 41 58 279 6850 | acelner@deloitte.ch

Anna Celner is the Global Banking & Capital Markets practice leader for DTTL, the Deloitte Global firm, with the responsibility for setting and executing the global banking strategy.

Monica O'Reilly

US Financial Services industry leader | Deloitte Risk and Financial Advisory | Deloitte & Touche LLP 1 415 783 5780 | monoreilly@deloitte.com

Monica O'Reilly is the Financial Services industry leader for Deloitte Risk and Financial Advisory with more than 20 years of experience in risk management, regulatory compliance, and controls consulting.

Mark Shilling

US Banking & Capital Markets leader | Deloitte Consulting LLP 1 973 602 5218 | mshilling@deloitte.com

Mark Shilling is Deloitte Consulting's US practice leader for the Banking & Capital Markets industry.

The Deloitte Center for Financial Services

Jim Eckenrode

Executive director | The Deloitte Center for Financial Services | Deloitte Services LP 617 585 4877 | jeckenrode@deloitte.com

Jim Eckenrode is the managing director of the Deloitte Center for Financial Services, where he is responsible for developing and executing Deloitte's research agenda while providing insights to leading financial institutions on business and technology strategy.

Val Srinivas

Banking and capital markets research leader | The Deloitte Center Financial Services | Deloitte Services LP 212 436 3384 | vsrinivas@deloitte.com

Val Srinivas is the banking and capital markets research leader at the Deloitte Center for Financial Services.

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