



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

Public consultation on the revised ECB guide to internal models

Institution/Company

Addiko Bank AG

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General comments

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Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant chapter/section/paragraph, where appropriate
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 15 September 2023

ID	Chapter	Section	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be incorporated
1	Credit risk	5.1 Structure of PD models	103	94	Clarification	It may be difficult to ensure the listed in Article 103 characteristics of a master scale across all models of a financial institution. Does this mean that a financial institution should/can have several different rating scales (or ultimately a separate rating scale for each model) in order to comply with the requirements?	It's important for understanding how the new regulation should be applied
2	Credit risk	5.1 Structure of PD models	105	95	Clarification	What is the priority between 1-year performance metrics and 2-3-year performance metrics? Does the article require financial institutions to use 2-3-year performance metrics instead of 1-year performance metrics during model development or just additional tests ensuring risk differentiation on 2-3-year horizon should be applied?	It's important for understanding how the new regulation should be applied