Credit Risk Assessment Framework

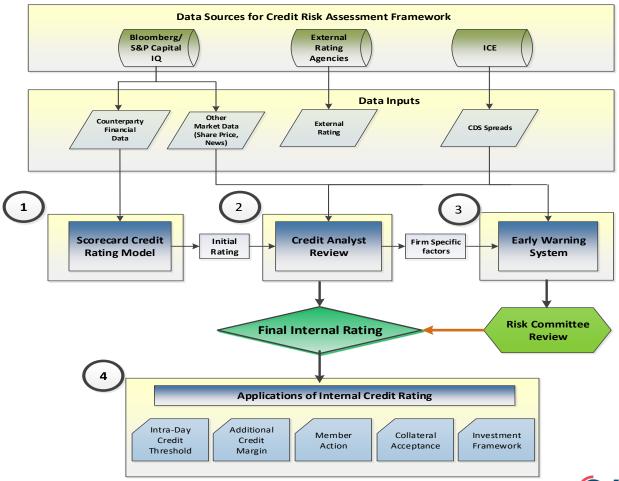


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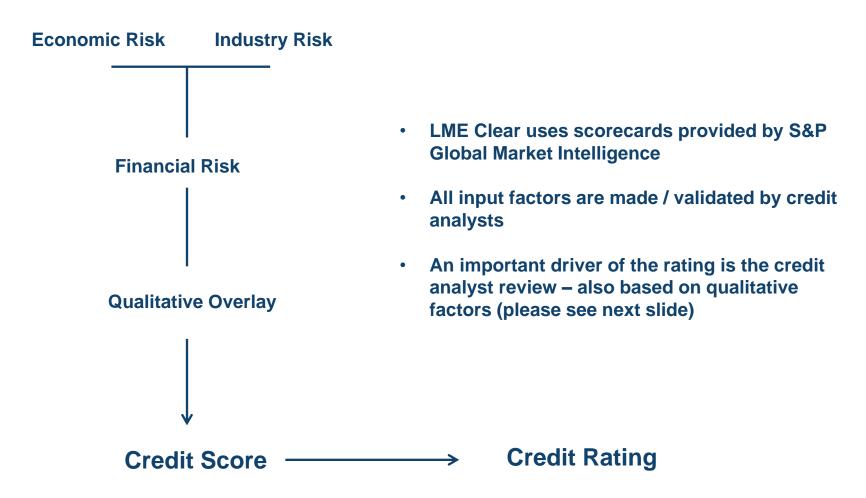
A consistent, transparent and dynamic approach driven by LME Clear's credit judgement to 1) Assess, 2) Quantify and 3) Monitor, the level of credit risk LMEC is materially exposed to from each counterparty it deals with.

The assessment framework will drive member limit setting, collateral and investment decisions, with the goal to prevent

credit loss.



Credit Scorecard Model Process





Credit Analyst Review

- Rationalise counterparty risk against relationship type
- Identify Counterparty Specific Key Risks
- · Justify model factors and confirm credit rating from scorecard
- Provides a full audit trail of the credit assessment process and decision

Risks/Ratings/Relationship

- Exposure Rationalise and Recommendation.
- Assessment of key Risks Likelihood and Impact rating for each identified risk, EWI Monitoring
- · Rating Profile Rating history and trend.
- · LME Relationship Strategy and Products.

Financial

- Profitability/ Cash Generation Assessment of financials.
- Asset Quality Assessment of asset quality
- Capitalisation/Liquidity Assessment of capital and liquidity position.

Counterparty Profile

- Group/Counterparty Description Legal Structure.
- Sector Exposure Sector risks.
- Peer Group Relative analysis, business position.
- WWR Identify wrong way risk it present.

Sensitivity/Stress Scenario

- Forecast financials under counterparty specific stress -Assess vulnerability to firm specific risks.
- Forecast financials under macro stress Assess vulnerability to macro risks.

Final Credit Rating/LME Credit Rating Bands



Early Warning Indicators (EWI)

Identify and monitor credit deterioration for both public and private counterparties based on real time market information

Indicators

Public companies	Private companies
 External Rating Agency Downgrades News Margin performance Market data: CDS prices Share price 	 External Rating Agency Downgrades News Margin performance

Data sourced from ICE (CDS), Bloomberg (Other Market Data), External Rating Agencies

Internal EWI Model Calibration

Credit Cycle Time Series Analysis

Determine the appropriateness of each market instrument as a measure of credit quality.

Optimisation

Set EWI triggers to generate the optimal level of warnings with the least amount of "false alarms"

Sensitivity Analysis

Calibrate to our portfolio characteristics and ensure effectiveness.



LME Clear Rating Scale – Minimum Member Rating

Rating Scale

- LME Clear operate on an internal Rating Scale from 1 to 10.
- 1 is the best rating (AAA/AA+ equivalent) and 10 is the rating of a defaulted entity (D equivalent).

Minimum Rating

- The minimum required rating for new LME Clear Members is 6
- LME Clear considers that an internal rating of 6 represents the appropriate balance between a broad participation and an appropriate risk profile for LME Clear and its members.

Remediation Tools for Members below the minimum rating

Rating Advice

- A downgrade below the minimum rating and the implications will be discussed with affected member, taking account of relevant Anti-Procyclicality considerations.
- LME Clear may make recommendations how the affected member can improve their internal rating, and the member should comply with the recommendation.
- As a general guide, LME Clear will only accept exposure to members below the minimum rating on a temporary basis.
- Compliance with LME Clear's credit standards is a requirement of the LME Clear Rules. Where a member falls below the minimum standards, particularly on a prolonged or repeated basis, LME Clear reserves the right to take appropriate action against the member, including, but not limited to, investigation and disciplinary action for breach of the Rules.

Additional Margin / Exposure Management

- LME Clear will protect itself against increased counterparty risk by calling for additional credit margin.
- The additional margin is charged on a sliding scale in accordance with Anti-Procyclicality considerations based on stress testing losses above margin requirements.
- Any exposures to members where there are material credit concerns will be under heightened scrutiny at the CCP. LME Clear will manage these through the application of the following toolkit so that there will be no significant impact on the CCP and the other members:
 - Exposure Control
 - o Additional Reporting
 - Collateral Management

