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# Sovereign Adaptive Risk Modeling and Implications on the Eurozone GREXIT case

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1 **Abstract:** In the wake of the 2008 financial crisis, the Financial Stability Board (FSB) and the  
2 Basel Committee on Banking Supervision (BCBS) created a list of Systemically Important Financial  
3 Institutions (SIFIs) with the intention of determining which financial institutions were important  
4 enough to the global market that their failure would result in systemic collapse. In this work we  
5 create a model that modifies the BCBS's five indicators of size, interconnectedness, cross-jurisdictional  
6 activities, complexity, and substitutability and applies these measures of systemic stress to  
7 governments. The original application of the model is to track the systemic interdependence of  
8 the Eurozone, with particular emphasis on the case of Greece. We anticipate this model can be used  
9 in regional fiscal situations beyond the Eurozone.

10 **Keywords:** Systemic risk - sovereign default - Grexit

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## 11 1. Introduction

12 The financial markets experienced some of the worst activity in recorded history during the global  
13 recession that began with the housing bubble crash in 2007. In the wake of that financial catastrophe,  
14 a new understanding of large corporations emerged, best summed up by former Chairman of the  
15 Federal Reserve Ben Bernanke. In an interview with CBS he said, "Many of the vulnerabilities that  
16 amplified the crisis are linked with the problem of so-called too-big-to-fail firms. A too-big-to-fail firm  
17 is one whose size, complexity, interconnectedness, and critical functions are such that, should the firm  
18 go unexpectedly into liquidation, the rest of the financial system and the economy would face severe  
19 adverse consequences." [24]

20 In the aftermath came the realization that governments relied upon the foundation of certain  
21 financial institutions that had been acting with little accountability and which were on the cusp of  
22 failure during the crisis. In order to better combat this threat to the stability of global finance, the  
23 Financial Stability Board (FSB), along with the Basel Committee for Banking Supervision (BCBS)  
24 drafted a methodology to determine what constitutes Globally Systemically Important Banks (G-SIB),  
25 which changed in later reports to Systemically Important Financial Institutions (SIFI). They suggested  
26 more stringent requirements for those institutions so that any future financial crises would not cause  
27 them to fail. It is important to mention that their determination of what is systemically important is  
28 done on a Loss Given Default (LGD) basis instead of the more popular Probability of Default (PoD)  
29 basis. The LGD viewpoint measures how bad things can get when they get bad and not just the  
30 probability that things will get to an indeterminate level of bad. This methodology was chosen by the  
31 BCBS because the intent of systemic importance was an accounting of the systemic risk of the financial  
32 institution should we already be in crisis and not just a probability of actually going into crisis. [1]  
33 While both the FSB and BCBS are purely advisory bodies, many of the largest nations in the world  
34 have adopted their guidance into law.

35 The BCBS published reports on their methodology beginning in 2009, with further reports  
36 on a biannual basis. The BCBS separated their method of determination of SIFIs into 5 distinct  
37 indicators. These indicators are Size, Interconnectedness, Cross-Jurisdictional Activities, Complexity,

38 and Substitutability. They were chosen specifically to encompass the many different facets that could  
39 contribute to the systemic importance of any given financial institution. The definitions of these  
40 indicators as defined by the BCBS can be found in their report. [1]

41 Each of the five indicators were broken up into a series of sub-indicator categories. Equally  
42 weighted under cross-jurisdictional activity were cross-jurisdictional claims and liabilities. For size the  
43 criteria was just the total exposure as defined by the Basel III ratio. Interconnectedness put equal weight  
44 on three categories: securities outstanding, intra-financial system assets, and intra-financial system  
45 liabilities. For substitutability assets under custody, payments activity, and underwritten transactions  
46 in debt and equity markets were all given equal treatment. As for complexity, the committee measures  
47 the notional amount of OTC derivatives, Level 3 assets, and trading and available for sale securities.  
48 [1]

49 The methodology for assigning a value for an indicated company is as follows:

50 "For each bank, the score for a particular indicator is calculated by dividing the individual bank  
51 amount (expressed in EUR) by the aggregate amount for the indicator summed across all banks in  
52 the sample. This amount is then multiplied by 10,000 to express the indicator score in terms of basis  
53 points. For example, if a bank's size divided by the total size of all banks in the sample is 0.03 (i.e. the  
54 bank makes up 3% of the sample total) its score will be expressed as 300 basis points. Each category  
55 score for each bank is determined by taking a simple average of the indicator scores in that category.  
56 The overall score for each bank is then calculated by taking a simple average of its five category scores.  
57 The maximum total score, i.e. the score that a bank would have if it were the only bank in sample, is  
58 10,000 basis points (i.e. 100%)...

59 ...Banks that have a score produced by the indicator-based measurement approach that exceeds a  
60 cutoff level set by the Committee will be classified as G-SIBs. Supervisory judgment may also be used  
61 to add banks with scores below the cutoff to the list of G-SIBs...

62 ...It should be noted that the number of G-SIBs, and their bucket allocations, will evolve over time  
63 as banks change their behavior in response to the incentives of the G-SIB framework as well as other  
64 aspects of Basel III and country-specific regulations." [3]

## 65 2. Methods

66 It is the purpose of this paper to modify the methodology used by the FSB and BCBS in order  
67 to apply it to sovereigns instead of financial institutions, with the intention of identifying countries  
68 which are systemically important. This systemic importance is relative to a specified financial system,  
69 whether solely their immediate neighbors or the global financial system. The work is done in the  
70 same mindset as the original BCBS report. However, financial institutions and governments differ in  
71 significant ways. We alter the FSB/BCBS criteria while trying to retain the perceived intent of their  
72 work.

73 This project was originally inspired by the situation developing in Greece during the summer of  
74 2015 and the possible effect that it could have on the members of the Eurozone. Greece was faced with a  
75 debt crisis from which it seemingly could never escape, a large budget deficit, collapsing market assets,  
76 low bond confidence, high unemployment, massive proportional government spending, and few  
77 further means of foreign aid. The Greek public resigned itself to its fate, with bank runs taking place.  
78 Analysts of the situation proposed the inevitability of a Greek financial collapse, and governments who  
79 loaned Greece money that hinged on recovery were facing taking fractions of what they lent or nothing  
80 at all. The most likely scenario of Greece's default would be total Greek bankruptcy accompanied by  
81 its exit from the Eurozone fiscal union, popularly referred to as the "Grexit."

82 Much of the speculation surrounding the Greek financial crisis concerned what a Greek default  
83 would trigger in the Eurozone's financial system and beyond. Especially concerning was the effect  
84 that a Greek default would have on other troubled economies in the Eurozone such as Portugal, Spain,  
85 and Italy. While this model, especially in this first iteration, will not give an absolute determination

86 of what the extent of a Greek default would entail, it will at the very least speak to the relative fiscal  
87 importance of Greece in the Eurozone.

88 The new model devised for the failure of countries, dubbed the Adaptive Country Exposure Model  
89 (ACEM), uses the same five indicators of the FSB/BCBS report. However, because of the differences  
90 between countries and companies, it is necessary to modify the methodology that determined each of  
91 the five indicators.

92 Before such a model can be properly undertaken, we must first believe the assumption that a  
93 country can default. Although sovereign default is an historical fact, many may object to default in  
94 today's world economy. When a sovereign is part of a fiscal union it is particularly important that this  
95 assumption must hold for every country in the region of consideration. This may be a strong or weak  
96 assumption depending on the region and the viewpoint of the audience. Please note that we do not  
97 attempt to analyze the political ramifications of a country's default.

98 The BCBS methodology was frustrating in its simplistic approach to the mathematical bases for  
99 each of the indicators and the fact that equal weights were, seemingly arbitrarily, assigned to each of  
100 the five indicators. Preliminary findings suggested that a higher importance on the indicators of size,  
101 interconnectedness, and complexity would be best at the expense of the other two indicators. The  
102 highest importance would be assigned to interconnectedness due to the systemic impact of a highly  
103 interconnected country defaulting. The indicated country, and the system itself, may be defined at the  
104 discretion of whomever is utilizing the model.

105 We compute two different scores for each of the countries. The first is a SIFI-based score in which  
106 we weight all five categories equally, following the methods of the BCBS and FSB. We then compute a  
107 modified score, in which we have different weights for each of the five categories based upon relative  
108 importance of the scores for countries. In this situation we place a weight of 35% on interconnectedness,  
109 25% on size, 15% apiece on cross-jurisdictional activities and substitutability, and 10% on complexity.  
110 For the stability of a system, interconnectedness is clearly the most important with size second. It is  
111 also notable that interconnectedness focuses on a LGD basis, while the others deal with only PoD  
112 calculations. Since we had the most difficulty emulating the complexity calculation from the SIFI  
113 documentation, we felt this should see the smallest weight.

114 Now, the new model can be defined. Important definitions are as follows:

115

#### 116 1. Cross-Jurisdictional Activities

117 An analysis of a country's foreign liabilities to gain an understanding of the extent to which the  
118 country in question exists as a regional or global presence instead of a domestic one, calculated as:

- 119 • Proportion of debt money lent by surrounding countries divided by the total amount of loans to  
120 the indicated country presently outstanding
- 121 • This indicator is partially applicable to the substitutability indicator and as such should be  
122 completed first

123 This follows the committees' work almost completely.

124

#### 125 2. Size

126 The gross earnings of the country in proportion to its total debts, as well as its market share in the  
127 financial system. In addition, there is an added penalty to the size calculation should a country fail the  
128 Basel III leverage ratio.

- 129 • Combination of several metrics

130 – Proportion of Equity assets in relation to the GDP of the indicated country

131 – Market Share of the indicated country in the system

132 –  $size = \frac{Revenue\ Entity}{Revenue\ System} * (Members\ System) * \frac{Exposure\ Liability}{GDP}$

133 – If the indicated country falls underneath the standards set by the Basel III structure, then  
 134 the value will be multiplied by a factor. We have chosen 2 as this factor, but future data may  
 135 imply a different choice is better.

136 Again, this was very easy to adapt from the SIFI calculations.

137  
 138 3. Interconnectedness The effect a default of a country would have on surrounding countries and  
 139 the possible problems that would emerge from such an event. This would be an accounting of the debt  
 140 structure of the indicated country within the system as well as any regulatory actions that would have  
 141 to be taken as a result of the indicated country's default.

- 142 • Simulation of the default exposure on neighboring governments and financial institutions as a  
 143 direct result of the failure of the indicated country's government
- 144 • This would be surmised by a series of weighted directed graphs, a simplified version of the  
 145 counterparty interactions of national banks
- 146 • In pseudocode a single iteration for one node follows:

147 For  $i=1$  to  $N$  do

148 If  $CAI(\text{capital assets of institution}) - DE(\text{default exposure}) \geq 0$  but fails the Basel III structure  
 149 then "1"

150 If  $CAI - DE \geq 0$  and passes the Basel III structure afterward then "2"

151 If  $CAI - DE < 0$  then "3"

152 Sum "3" cases  $3_1, 3_2, \dots, 3_k$  and rank them by quantity  $(CAI - DAE)$

153 For highest rank, apply Regulatory Funds  $V_n$  to each case "3" until they qualify as "1"

154 If no more "3" cases remain, apply  $V_n$  to "1" cases

155 If  $V_n$  is limited, add international claims of second country to  $DE$

156 End

157

- 158 – Understand that "3" cases are the most unstable and face impending bankruptcy, while the  
 159 "1" cases are considered not financially viable by an objective deterministic source, but are  
 160 not as troubling
- 161 – Regulatory Funds are those in place by bodies of leading countries or partially outside of  
 162 the system.
- 163 – Only  $\frac{3}{4}$  of those funds are available (arbitrarily chosen) so as to leave some in reserve for  
 164 any future defaults in the system.
- 165 – Critical value at the end of the summation will be a 15% loss of the initial Total systemic  
 166 Assets
- 167 –  $N$  would represent as many central banks or governments as are in the area under  
 168 consideration
- 169 – This process would have to be run many times through to generate a steady state value for  
 170 the process.
- 171 – This indicator is unique from the other indicators for two important reasons. Firstly, it is  
 172 not understood as a correlated value of systemic importance, but rather a direct calculation  
 173 of the LGD of the indicated country. Secondly, it is also possible that this indicator affects  
 174 other ones recursively in the case of a complete default of the system.

175 Here we tried to get at the calculations that the committees wanted to perform. The committees  
 176 sought to capture the linkages to other entities, both direct and indirect, in order to understand how  
 177 a financial stress of one company would affect others in their industry. We sought to do something  
 178 similar on the sovereign level.

179 We calculated interconnectedness by looking at the amount of debt that a country holds for other  
180 countries vs. the amount of debt it has outstanding. Since our goal is to see what would happen  
181 should a country default, it is important to us to look beyond the first order effects. Should Country A  
182 default, it may leave Country B short to return what it owes to Country C. This kind of domino effect  
183 must be investigated to determine just how interconnected a country is on a relative basis. This is  
184 why we had to reach a steady state before being willing to report this as the true value of a country's  
185 interconnectedness.

186

187 4. Substitutability The amount of domestic expenditure will be calculated as a percentage of the  
188 country's tax base, as well as on a per capita basis comparable to neighboring countries.

- 189 • Several metrics are possible to use in the hope of understanding true domestic tax expenditure.  
190 Alternates and Corollaries could be: Domestic liability dollarization, which takes into  
191 account the debts that a citizen holds internally (per <http://chartsbin.com/view/34074> ),  
192 Unemployment, a measure of the work force collecting from taxes instead of paying into it  
193 (per <http://databank.worldbank.org/>)  
194 • The most comprehensive metric of the list was Final Consumption Expenditure, both as a  
195 proportion of the specified countries' GDP and on a per capita basis.

196 The committees hoped to ascertain the extent to which other institutions could provide materially  
197 the same services at a similar price in a similar amount of time to the institution under consideration.  
198 We sought to find the notional amount that countries provide that would not be easily replicated by  
199 the private sector as a complement to what the committee desired to calculate.

200 Here we view substitutability in the sense of which services the country provides to its citizens.  
201 Does the country take a larger role than its neighbors? Does it do a lot more than the private sector? If  
202 the government were no longer able to function because of fiscal problems, how difficult would it be  
203 to substitute for them?

204

205 5. Complexity The relative stability of the country as defined by the consumer market. This is  
206 done by compiling the valuation of the indicated country relative to the systemic average scaled  
207 appropriately. This will be where any market action would be taken into account as well.

208

209 In the SIFI criteria, this measure attempts to determine just how complex are the financial  
210 instruments that a financial institution holds. Although the committees look only at derivatives  
211 that are centrally cleared, they also look at illiquid or difficult to value assets (Basel Level III assets).  
212 We have to come up with something that approximates this kind of riskiness for a sovereign. One  
213 reasonable proxy for the riskiness is the market's opinion of a country's riskiness, spreads on Credit  
214 Default Swaps. We use these data to find implied annual probabilities of default.

215

### 216 3. Results

#### 217 3.1. Greece

218 As was stated above, the situation that was afflicting Greece, the "Grexit", was the inspiration  
219 for the model and as such was its first test case. For most of the statistics, the annual reports  
220 of the appropriate central banks, World Bank [26] and CIA World Factbook [27] were used to  
221 generate the necessary metrics. For these scores we used our unequally weighted version of the score.  
222 Cross-Jurisdictional Activities: For this section, statistics for External Debt and Public Debt were found  
223 using the CIA Factbook and applied for each of the members' states of the Eurozone.

224 Size: The relevant revenue stream for each of the Eurozone members was found to be the tax base  
225 to accede to the logic posed in the definition of the size indicator. The Tax Base and GDP numbers for

226 the member states were found in the World Databank and the Total Debt and capital reserve numbers  
227 were found in the CIA Factbook

228 Interconnectedness: In order to best approximate the strain that would be placed upon the  
229 Eurozone members as a direct result of Greece's default, proportional quotas were found within the  
230 three major lending bodies in the situation: the IMF, the ECB, and Eurozone states. Less than obvious  
231 counterparty interaction between central banks, such as the TARGET2 payment system, were also  
232 taken into account and added to the default exposure of Greece.

233 Substitutability: Final Consumption expenditure data, both per capita and as a percentage of the  
234 Eurozone members' GDP, was found in the World Databank

235 Complexity: CDS spreads come from S&P CapitalIQ.

236

237 RESULTS OF THE GREECE TEST CASE AS OF 7/30/15:

**Table 1.** Greece's Cross-Jurisdictional Activities

Mean	Std Dev	standard score	Systemic Importance
0.54741	0.2996	-0.3072	44.88

238 The cross-jurisdictional activities index (Table 1) indicates that Greece operates slightly less than  
239 the systemic average on foreign soil, holding its debt more in domestic markets. While the definition  
240 of the indicator would identify this as systemically less important, the unique case of the Eurozone's  
241 financial systems, where much of the foreign debt is hidden and public debt can be transferred to  
242 foreign entities, dampen the little indication that this category would have on sovereigns.

**Table 2.** Greece's Size

Mean	Std Dev	standard score	Systemic Importance
3.30966	4.0575	-0.36653	43.89

243 The size indicator (Table 2) implies that Greece as a country is proportionally a smaller financial  
244 presence than the systemic average, which is logically coherent. Even with the penalty as a result of  
245 failing the Basel III Leverage Ratio, their miniscule size determined the point value. It is important to  
246 understand that the standard deviation of this indicator is massive proportional to the mean. This is  
247 indicative of the great financial disparity within the Eurozone.

**Table 3.** Greece's Interconnectedness

Number of simulations	mean default	max default	mean assets lost (bn)	Systemic Importance
250	0.26	8	1060	23.46

248 The results of the interconnectedness simulations (Table 3) indicate that Greece's default leveraged  
249 in the worst possible way would result in the potential default of 8 system members within the  
250 Eurozone.

251 In the most recent estimation of the umbrella debt funds, the relevant regulatory bodies have  
252 sufficient funds to save the 8 system members without drawing on their external claims within the  
253 rest of the system, thus determining that Greece is not systemically important by the standard set in  
254 ACEM. However, it is important to note that approximately 560 billion euros of the 750 billion euros  
255 available would have to be used to stop the bleeding that a Greek default and/or Grexit would cause.  
256 Umbrella funds for the entire Eurozone would be used to stabilize the region in the event of a "Grexit,"  
257 thus making the rest of the member states extremely fragile to further financial distress.

258 Table 4 indicates that Greece spends more domestically than the systemic average, implying that  
259 it is systemically important by that metric. Logically, high domestic expenditure makes it more costly  
260 for any future governmental authority to step in to the financial situation of the populace. This would

**Table 4.** Greece's Substitutability

Mean	Std Dev	z-score	Systemic Importance
76.142	9.076	0.617	60.29

261 most likely result in payment loss domestically, which would then trigger further financial issues, such  
 262 as perennial bank fragility, public unrest, and decline in available domestic industry.

The summarized data for the complexity indicator (Table 5) is as follows:

**Table 5.** Greece's complexity

CDS spread	annual prob of default	score
5003.09	0.45	100

263  
 264 Combining the results of the five indicators into a total systemic importance, it is determined  
 265 that Greece, while a nuisance to the rest of the Eurozone, is not systemically important. A lack  
 266 of Systemic Importance in the relative size of Greece as well as the mock default scenario run in  
 267 the interconnectedness portion were especially crucial to the determination. Complexity was the  
 268 largest indicator indicating that Greece is systemically important to the health of the Eurozone. The  
 269 substitutability indicator result was largely in favor of systemic importance, implying that the Greek  
 270 people would be extremely negatively affected in the result of a Grexit.

271 The Greek test case listed above contains just a single data point for the systemic importance of  
 272 the country. We desire to create a time series of Systemic Importance data, but we have been unable  
 273 to obtain reliable detailed TARGET2 data, despite the request to several sources. Even the European  
 274 Central Bank was unwilling to provide us with such data.

### 275 3.2. Eurozone

276 Although it is interesting to score Greece, the more compelling question is about which of the  
 277 nations are most important to the fiscal stability of the Eurozone. Once again the only data point we  
 278 have is from 30 July 2015, as this is the only date for which detailed TARGET2 data are available.  
 279 With the appropriate TARGET2 data, we would be able to compute a time series of these Systemic  
 280 Importance scores. It would be incredibly interesting to see whether the relative Systemic Importance  
 281 is static, or whether countries change rankings over time. With the information we have, we can tell  
 282 what the Eurozone Systemic Importance levels were on 30 July 2015.

283  
 284 From Table 6 we can see that Germany and France are far and away the most important countries  
 285 for the systemic health of the Eurozone. The Netherlands is a clear third. Using the somewhat arbitrary  
 286 mark of 50 to determine systemic importance, we find that Luxembourg is the only other country  
 287 to clear that level in our scoring system. It is interesting that just below the score of 50 come two  
 288 countries with fear about their continuing stability: Italy and Greece, though Belgium is nearly equal  
 289 in the modified (unequal weight) score for 30 July 2015. It is also interesting that an equally-weighted  
 290 version of the score has Greece and Luxembourg trading places, with Greece above the mark of 50 and  
 291 Luxembourg dropping below.

292 By staring at the chart, we can notice some trends among the scores. The four most systemically  
 293 important countries were the four that had the largest size. Germany and France also had the  
 294 highest interconnectivity. The Netherlands' score was bolstered by having the second largest  
 295 cross-jurisdictional activity. Greece's complexity was the largest pull for it.

**Table 6.** Eurozone ACEM scores

Country	Size	C-J Act.	Subst.	Complex.	Interconn.	SIFI score	modified score
Austria	47.45	18.87	60.78	0.24	26.46	30.76	33.10
Belgium	52.88	81.08	63.50	0.22	25.57	44.65	43.88
Cyprus	22.36	81.35	51.36	7.59	5.01	33.53	28.01
Estonia	21.00	97.48	15.91	0.64	3.42	27.69	23.52
Finland	30.04	21.51	75.76	0.26	20.32	29.58	29.24
France	98.04	21.87	67.44	0.19	150.42	67.59	90.57
Germany	99.34	39.54	58.02	0.08	198.57	79.11	108.98
Greece	35.70	49.21	65.43	100	23.46	54.76	44.33
Ireland	64.68	15.96	28.92	1.76	39.78	30.22	37.00
Italy	31.68	28.85	59.97	1.64	77.95	40.02	48.69
Latvia	21.27	86.11	30.18	0.51	1.97	28.01	23.50
Lithuania	22.68	55.25	33.23	1.00	11.75	24.78	23.15
Luxembourg	85.52	29.36	39.21	0.22	52.70	41.40	50.13
Malta	23.19	29.36	49.78	1.10	7.01	22.09	20.23
Netherlands	93.32	89.35	53.14	0.13	45.20	56.23	60.54
Portugal	38.45	17.26	52.16	2.14	18.30	25.66	26.64
Slovakia	22.10	14.25	26.39	0.58	7.53	14.17	14.31
Slovenia	21.20	29.49	25.83	1.13	5.67	16.66	15.70
Spain	34.07	18.80	45.35	1.31	42.50	28.41	33.15

#### 296 4. Discussion

297 Due to the political situation for a government in default, there may be ramifications that are  
 298 unnoticed by the purely fiscal ACEM. While these influences are not in the model in any way, they open  
 299 up avenues for future study on how countries act when there is some fiscal danger in the Eurozone.

300 Governments should probably be more swayed by public opinion than financial institutions, so  
 301 the effects that a catastrophe would have on the public and their response to those effects should  
 302 possibly be considered when determining the systemic importance of a country, though mathematically  
 303 explaining this would be incredibly difficult. The devaluation of citizens' assets by a possible shift back  
 304 to a domestic currency could conceivably be calculated from historical cases of governmental default  
 305 in the modern age. For the case of Greece up to a 40% loss of value of assets for individual citizens  
 306 from a shift back to the drachma has been proposed. It is clear that this would lead to significant civil  
 307 unrest.

308 It is conceivable that the decisions made by leading politicians during financial crises will cause  
 309 some volatility, most obviously in the country that would default, but also possibly in neighboring  
 310 countries. Especially interesting are the effort needed from the leading bodies in the system to restore  
 311 consumer faith, even in their own countries. Extraordinary measures like quantitative easing and  
 312 similar fiscal policies would likely be necessary. These policies would then result in the devaluation of  
 313 a currency compared to all others.

314 With the issues in Venezuela, we believe a study of South America could be particularly insightful.  
 315 The situation of North Korea could be an interesting reason to look at the Asian region. The pull of  
 316 OPEC on the Middle East could lead to some provocative results. And Zimbabwe is one of several  
 317 African countries that would be compelling to investigate. Again, the major problem in any of these  
 318 calculations is likely to be obtaining reliable data.

#### 319 5. Conclusions

320 In general, this model is as imprecise as its predecessor. During the construction of the model, we  
 321 were especially dissatisfied with the complexity and interconnectedness indicators. It is the hope of the  
 322 authors that in later iterations of the model that all of the indicators will become more comprehensive,  
 323 especially the more involved ones such as interconnectedness and complexity. However, it is with the  
 324 original intention of the BCBS and FSB model that the value of the ACEM model is found. As advisory

bodies, it is the responsibility of the FSB and BCBS to prepare regulators to contain the damage that would be caused by the default of a SIFI. The ACEM model, while imperfect, aims for the same goal for regulatory governmental bodies, and at the time of this writing there is no superior model which serves the same purpose. With all things, the ACEM model can be improved over time, and to that effect we would be more than happy to receive any ideas from others.

With the centralization of debt around national, public institutions it may become possible that sovereign default will become a real concern, not just strategically but also fiscally. This work is intended as the beginning of a framework describing which nations are systemically important so that the risk to the global financial system can be estimated and hopefully mitigated.

**Conflicts of Interest:** The authors declare no conflict of interest.

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