

Research on Risk Control and Regulatory Policies of Financial Institutions

Zhuolin Zhao

Universiti Putra Malaysia

ABSTRACT

This paper examines the risk control and regulatory policies of financial institutions. It begins with classifying the risks faced by financial institutions and analyzes the impact of these risks on both the institutions and the broader financial system. The importance of risk control is then explored, followed by a detailed discussion of the current regulatory policies and strategies in place. Finally, the paper concludes with a summary of the research and suggestions for future study directions.

KEYWORDS

Risk Control; Regulatory Policies; Financial Institutions

1. INTRODUCTION

Financial institutions play a crucial role in the modern economic system, with their safety and stability directly impacting economic health. Financial risk refers to the potential for financial loss due to various uncertainties. As financial markets continue to evolve and globalization accelerates, the risks faced by financial institutions have become increasingly complex and diverse. Thus, effectively controlling financial risk and ensuring the stability of the financial system has become a common focus for financial regulatory bodies and academia.

2. LITERATURE REVIEW

There is an extensive body of literature on risk control and regulatory policies for financial institutions, covering various types of risks and their management strategies. This section provides a detailed review of the research on market risk, credit risk, liquidity risk, and their respective regulatory policies.

(1) Market Risk

Market risk arises from fluctuations in market prices, which can lead to changes in the value of assets or liabilities. Research on market risk primarily focuses on risk measurement and management methods.

J.P. Morgan and R. Reider, in their paper "Innovations in Risk Measurement: The VAR Approach," introduced the Value at Risk (VAR) method, a commonly used tool for measuring market risk. The VAR method estimates the maximum potential loss of a financial asset portfolio within a given confidence level and holding period, based on historical data. Although widely used in market risk management, the VAR method has limitations, such as failing to capture risks under extreme market conditions.

C. Alexander, in his book "Market Risk Analysis," provides a comprehensive overview of various market risk measurement and management methods, including Extreme Value Theory, Conditional Value at Risk (CVaR), and GARCH models. These methods address the shortcomings of the VAR method, offering more comprehensive and accurate market risk assessment tools. Additionally, Alexander explores the use of financial derivatives, such as options, futures, and swaps, in market risk management and their hedging strategies.

(2) Credit Risk

Credit risk refers to the risk of loss due to a borrower's or counterparty's failure to meet contractual obligations. Research on credit risk primarily focuses on its measurement, management, and the role of derivatives markets.

D. Duffie and K. Singleton, in their book "Credit Risk: Pricing, Measurement, and Management," systematically outline quantitative models and measurement methods for credit risk. They introduce default probability models, credit exposure models, and loss given default models, which form the foundation of modern credit risk management. Additionally, Duffie and Singleton discuss the development of the credit derivatives market and its application in credit risk management, particularly the use of credit default swaps (CDS) for hedging and transferring credit risk.

R. Merton, in his paper "On the Pricing of Corporate Debt: The Risk Structure of Interest Rates," proposed the famous Merton model. This model quantifies credit risk by viewing corporate bond default risk as the risk of the company's asset value falling below its liabilities. The Merton model has significantly influenced credit risk pricing and management, providing a theoretical basis for subsequent research in the field.

(3) Liquidity Risk

Liquidity risk refers to the risk that a financial institution cannot quickly obtain funds at a reasonable price to meet payment demands. Research on liquidity risk primarily focuses on its measurement, management, and systemic impact.

H. Acharya and M. Richardson delve into the causes and effects of liquidity risk. They point out that liquidity risk affects not only individual financial institutions' soundness but also has systemic implications through financial contagion effects. Acharya and Richardson also discuss liquidity risk management strategies, including liquidity reserves, the Liquidity Coverage Ratio (LCR), and the Net Stable Funding Ratio (NSFR) regulatory indicators' design and implementation.

B. Holmstrom and J. Tirole analyze the role of financial intermediaries in managing market liquidity. They propose a model of liquidity supply and demand balance, explaining the crucial role of financial intermediaries in alleviating market liquidity shortages. Additionally, Holmstrom and Tirole discuss the role of central banks in providing emergency liquidity support, emphasizing their importance as lenders of last resort.

3. THE SIGNIFICANCE OF RISK CONTROL IN FINANCIAL INSTITUTIONS

Risk control is a critical function within financial institutions due to the complex and dynamic nature of financial markets. Effective risk management is essential for ensuring the stability and sustainability of these institutions, as well as for maintaining confidence among stakeholders including investors, customers, and regulators. This section delves into the multifaceted importance of risk control in financial institutions.

(1) Ensuring Financial Stability

The primary significance of risk control lies in its ability to enhance financial stability. Financial institutions operate in an environment characterized by various types of risks, such as market risk,

credit risk, and liquidity risk. Effective risk management helps mitigate the impact of these risks, thereby preventing potential financial distress or collapse. By identifying, assessing, and managing risks proactively, financial institutions can avoid significant losses and maintain their operational continuity.

(2) Protecting Stakeholder Interests

Risk control is crucial for protecting the interests of various stakeholders, including shareholders, customers, employees, and the broader financial system. Shareholders rely on the institution's stability and profitability for returns on their investments. Customers depend on the institution's ability to provide reliable services, such as loans and deposits. Employees benefit from job security and a stable working environment. By managing risks effectively, financial institutions can safeguard the interests of these stakeholders, fostering trust and loyalty.

(3) Regulatory Compliance

Financial institutions are subject to stringent regulatory requirements aimed at ensuring their soundness and protecting the financial system. These regulations often mandate the implementation of robust risk management frameworks. Effective risk control ensures compliance with these regulatory standards, thereby avoiding penalties, fines, and reputational damage. Moreover, adherence to regulatory requirements can enhance the institution's credibility and standing within the financial industry.

4. CLASSIFICATION OF FINANCIAL INSTITUTION RISKS

Financial institutions face a variety of risks, primarily including market risk, credit risk, operational risk, liquidity risk, legal and compliance risk, and reputational risk. This paper focuses on three aspects: market risk, credit risk, and liquidity risk.

(1) Market Risk

Market risk refers to the risk arising from changes in the value of assets or liabilities due to market price fluctuations. Market risk can be further divided into interest rate risk, exchange rate risk, equity price risk, and commodity price risk.

Interest rate risk, a major component of market risk, refers to the risk of fluctuations in asset or liability values due to changes in interest rates. Interest rate risk affects financial institutions' net interest income and economic value. As assets and liabilities of financial institutions typically have different interest rate sensitivities, interest rate changes impact profitability and capital levels. Interest rate risk management is mainly achieved through asset-liability management (ALM) and interest rate derivatives (such as interest rate swaps and futures).

Exchange rate risk refers to the risk arising from exchange rate fluctuations. For financial institutions holding foreign currency assets or liabilities, exchange rate fluctuations directly affect their financial position and operating results. Exchange rate risk is divided into transaction risk, translation risk, and economic risk. Transaction risk refers to the risk of exchange rate fluctuations on unsettled foreign currency transactions; translation risk refers to the risk of exchange rate fluctuations on foreign currency asset and liability translations into local currency; economic risk refers to the risk of exchange rate fluctuations affecting future cash flows. Exchange rate risk management typically involves hedging strategies such as forward contracts, options, and swaps.

Equity price risk refers to the market price fluctuation risk faced by financial institutions holding stocks and related derivatives. Equity price risk directly impacts financial institutions' investment portfolios and capital adequacy. Financial institutions can manage equity price risk through portfolio diversification and using financial instruments such as stock index futures and options.

Commodity price risk refers to the risk faced by financial institutions holding commodities or related derivatives due to price fluctuations. Commodities include oil, metals, agricultural products, etc., whose prices are influenced by supply-demand relationships, geopolitical factors, etc. Financial institutions hedge commodity price risk using instruments such as commodity futures and options.

(2) Credit Risk

Credit risk refers to the risk of loss caused by the failure of the borrower or counterparty to fulfill the contractual obligations. Credit risk is one of the main risks faced by financial institutions, involving various businesses such as loans, bond investments, and derivative transactions.

Loan credit risk is the most important credit risk faced by financial institutions, referring to the risk that the borrower cannot repay the principal and interest on time. The management of loan credit risk includes pre-loan review, loan monitoring, and post-loan management. Pre-loan review assesses the borrower's repayment ability and willingness through credit scoring, financial analysis, collateral evaluation, etc.; loan monitoring regularly assesses the borrower's financial status, operating conditions and other information to timely discover potential risks; post-loan management includes the disposal, restructuring and collection of non-performing loans.

Bond credit risk refers to the risk that the bond issuer cannot pay interest or repay the principal on time. The assessment of bond credit risk mainly depends on the rating results of credit rating agencies, but financial institutions should also conduct independent assessments based on their own credit risk analysis capabilities. Bond credit risk management includes portfolio diversification, investment term matching, and the use of credit derivatives.

Derivative trading credit risk refers to the risk that the counterparty cannot fulfill its contractual obligations when the derivative contract expires. Since derivatives trading usually involves a large leverage, the credit risk is relatively high. Financial institutions can manage the credit risk of derivatives trading by signing credit support agreements, setting margin requirements and conducting regular credit risk assessments.

Counterparty credit risk refers to the risk that financial institutions face due to counterparty default during transactions. This risk is widely present in various financial transactions, such as securities lending, repurchase agreements, foreign exchange transactions, etc. Counterparty credit risk management includes credit rating of counterparties, setting transaction limits, signing guarantee agreements and conducting regular credit risk assessments.

(3) Liquidity Risk

Liquidity risk refers to the risk that financial institutions cannot quickly obtain funds at a reasonable price to meet payment needs. Liquidity risk is divided into asset liquidity risk and funding liquidity risk.

Asset liquidity risk refers to the risk that the assets held by financial institutions cannot be quickly converted into cash or the conversion price is lower than expected. The management of asset liquidity risk is mainly achieved through the diversification of asset portfolios and the proportion of liquid assets held. Financial institutions should hold a certain proportion of highly liquid assets, such as cash, treasury bonds, etc., to cope with short-term funding needs. In addition, the reasonable matching of asset and liability maturities is also an important means of managing asset liquidity risk.

Funding liquidity risk refers to the risk that financial institutions cannot quickly obtain the required funds to meet payment needs. The management of funding liquidity risk includes regulatory indicators such as liquidity coverage ratio (LCR) and net stable funding ratio (NSFR). LCR requires financial institutions to hold sufficient highly liquid assets to cope with 30 days of cash outflows; NSFR requires financial institutions to maintain long-term stable funds to support their long-term assets. In addition, financial institutions should also establish emergency liquidity plans to clarify the channels for obtaining funds and response measures in emergency situations.

Liquidity stress testing is an important tool for assessing the liquidity risk tolerance of financial institutions under extreme market conditions. By simulating various extreme scenarios, such as market crashes and large-scale withdrawals by customers, financial institutions can assess their liquidity risk levels and develop corresponding response strategies. The results of liquidity stress testing can be used to adjust asset-liability structures, increase liquidity reserves, and optimize liquidity management strategies.

(4) Comprehensive management strategy

In order to effectively manage market risk, credit risk and liquidity risk, financial institutions should establish a comprehensive risk management system. First, comprehensive risk management policies and procedures should be formulated to clarify the management objectives and methods of various risks. Secondly, a risk management department should be established and equipped with professional risk management personnel to be responsible for risk identification, assessment, monitoring and reporting. Thirdly, advanced risk management tools and technologies, such as risk models and information systems, should be adopted to improve the scientificity and effectiveness of risk management. Finally, risk culture construction should be strengthened to improve the risk awareness and risk management capabilities of all employees and form a risk management pattern with full participation and full coverage.

In summary, market risk, credit risk and liquidity risk are the main risk categories faced by financial institutions. Effective risk management can improve the robustness and risk resistance of financial institutions and ensure that they maintain competitive advantages and sustainable development in a complex and changing market environment. In the future, with the development and innovation of the financial market, the complexity and importance of risk management will be further improved, and financial institutions should continuously optimize risk management strategies and methods to cope with emerging risks and challenges.

5. REGULATORY POLICY STRATEGIES FOR RISK CONTROL

Financial institutions face a variety of risks. In order to effectively control these risks, regulators have formulated various regulatory policies and strategies. Among them, capital adequacy management, liquidity management and macro-prudential management are key regulatory policy tools. This article will explore these three regulatory policy strategies in detail.

(1) Capital adequacy management

Capital adequacy ratio management is one of the core contents of financial supervision. Its main purpose is to ensure that financial institutions have sufficient capital to resist potential risk losses and maintain the stability of the financial system. Capital adequacy ratio is usually expressed as the ratio of capital to risk-weighted assets. Basel III is the capital adequacy ratio regulatory framework widely adopted internationally. Its core contents include core tier 1 capital adequacy ratio (CET1), tier 1 capital adequacy ratio and total capital adequacy ratio.

Core tier 1 capital adequacy ratio (CET1) refers to the ratio of core tier 1 capital to risk-weighted assets. Core tier 1 capital includes common stock, retained earnings and other equity instruments, and is the most risk-resistant capital of financial institutions. According to the requirements of Basel III, the CET1 of financial institutions shall not be less than 4.5%. In addition, Basel III also introduces additional capital buffer requirements, including capital protection buffer and countercyclical capital buffer.

Capital protection buffer is a new requirement introduced by Basel III, which aims to enhance the risk resistance of financial institutions in economic downturns. The capital protection buffer requires financial institutions to hold an additional 2.5% of CET1 on the basis of the minimum CET1 ratio of 4.5%. This buffer is gradually built up under normal economic conditions and can be used under

economic pressure to absorb losses and maintain credit supply. If a financial institution fails to meet the capital protection buffer requirements, its distribution activities such as dividends, bonuses and stock repurchases will be restricted.

The countercyclical capital buffer is designed to respond to the cyclical fluctuations of systemic risks and prevent the financial system from over-expanding during economic booms and over-contracting during economic recessions. The specific proportion of the countercyclical capital buffer is determined by regulators in various countries based on domestic economic and financial market conditions, usually between 0% and 2.5%. The introduction of the countercyclical capital buffer requires financial institutions to increase capital reserves during economic booms to cope with the risk losses that may be caused by economic downturns.

Risk-weighted assets (RWA) are the basis for calculating capital adequacy ratios. The calculation of RWA includes three parts: credit risk, market risk and operational risk. Credit risk RWA is calculated based on the credit risk weight of the asset; market risk RWA is calculated based on the market risk exposure of the trading assets held; and operational risk RWA is calculated based on the operating income or other risk indicators of the financial institution. Accurate calculation of RWA is the key to ensuring capital adequacy compliance.

Although capital adequacy ratio regulation has played an important role in improving the risk resistance of financial institutions, it also faces some challenges. First, financial institutions may circumvent capital adequacy ratio requirements through asset securitization, capital arbitrage, etc., thereby weakening the regulatory effect. Second, the calculation of capital adequacy ratio is relatively complex, and there are differences in regulatory standards and implementation details in different countries and regions, which may lead to regulatory arbitrage by multinational financial institutions. In addition, capital adequacy ratio regulation may cause financial institutions to reduce loan issuance during economic downturns, thereby exacerbating economic fluctuations. Therefore, regulators need to continuously optimize the capital adequacy ratio regulatory framework and improve regulatory effectiveness and consistency.

(2) Liquidity Management

Liquidity management is an important part of financial supervision. Its purpose is to ensure that financial institutions have sufficient high-liquidity assets to cope with short-term and long-term funding needs and prevent liquidity risks. Liquidity risk refers to the risk that financial institutions cannot obtain the required funds in a timely manner at a reasonable price, which may cause financial institutions to be unable to fulfill their payment obligations, thereby triggering a systemic financial crisis. Basel III introduced two key indicators in liquidity management: liquidity coverage ratio (LCR) and net stable funding ratio (NSFR).

Liquidity coverage ratio (LCR) is an important indicator to measure the ability of financial institutions to cope with liquidity needs in the short term (30 days). High-liquidity assets include cash, central bank deposits, government bonds with high credit ratings, etc. These assets can be quickly converted into cash in a short period of time. Net cash outflow within 30 days refers to the net value of cash outflows of financial institutions in the next 30 days minus cash inflows. According to the requirements of Basel III, the LCR of financial institutions shall not be less than 100%, that is, high-liquidity assets should at least cover the net cash outflows in the next 30 days.

Net stable funding ratio (NSFR) is an important indicator to measure the stability of financial institutions' funds in the long term (one year). Available stable funds include core deposits, long-term loans and capital, etc. These sources of funds are relatively stable and not easy to be withdrawn in the short term. Required stable funds refer to the funding needs of financial institutions' assets and outstanding commitments. According to the requirements of Basel III, the NSFR of financial institutions shall not be less than 100%, that is, available stable funds should at least cover the required stable funds.

In order to effectively manage liquidity risk, financial institutions should establish a sound liquidity risk management framework. First, liquidity risk management policies and procedures should be formulated to clarify the management objectives and methods of liquidity risk. Secondly, a liquidity risk management committee should be established to be responsible for monitoring and decision-making on liquidity risk. Thirdly, advanced liquidity risk management tools and techniques should be adopted, such as liquidity stress testing, cash flow forecasting and liquidity risk monitoring systems. Finally, liquidity risk assessments and reports should be conducted regularly to timely identify and respond to potential risks.

Liquidity stress testing is an important tool for assessing the liquidity risk tolerance of financial institutions under extreme market conditions. By simulating various extreme scenarios, such as market crashes and large-scale withdrawals by customers, financial institutions can assess their liquidity risk levels and formulate corresponding response strategies. The results of liquidity stress testing can be used to adjust the asset-liability structure, increase liquidity reserves and optimize liquidity management strategies.

Liquidity contingency plans are important measures to deal with sudden liquidity crises. Liquidity contingency plans should include emergency funding channels, emergency asset liquidation strategies, internal and external communication mechanisms, etc. Financial institutions should regularly test and update liquidity contingency plans to ensure that they are operational and effective in actual crises.

(3) Macroprudential Management

Macroprudential management is one of the important strategies of financial supervision, and its purpose is to maintain the stability of the entire financial system and prevent and respond to systemic risks. Systemic risk refers to the risk contagion effect in the financial system, which may lead to large-scale turbulence in the financial market and affect the overall stability of the economy. Macroprudential management ensures the sound operation of the financial system by monitoring and controlling cyclical fluctuations and structural risks in the financial system.

Countercyclical capital buffer is an important tool of macroprudential management, which aims to deal with systemic risks in the financial cycle. Countercyclical capital buffer requires financial institutions to increase capital reserves during economic booms to cope with the risk losses that may be caused by economic downturns. The specific ratio is determined by regulatory authorities in various countries based on domestic economic and financial market conditions, usually between 0% and 2.5%. The implementation of countercyclical capital buffer can slow down the procyclical behavior of the financial system and enhance the risk resistance of financial institutions during economic downturns.

Leverage ratio restrictions are an important measure to prevent excessive leverage in the financial system. Leverage ratio refers to the ratio of a financial institution's capital to its total assets, usually without considering the risk weight of the assets. Basel III stipulates that the leverage ratio of financial institutions shall not be less than 3%. Leverage ratio limits are intended to prevent financial institutions from obtaining high-risk and high-return returns by increasing leverage, thereby enhancing the robustness of the financial system.

(4) Systemically Important Financial Institutions

Systemically important financial institutions (SIFIs) refer to financial institutions with significant influence and potential systemic risks in the financial system. The collapse of SIFIs may have a significant impact on the financial system and the overall economy. In order to reduce the systemic risks of SIFIs, regulators have imposed higher capital requirements and stricter regulatory standards on them. For example, global systemically important banks (G-SIBs) need to hold an additional 1% to 3.5% of core tier 1 capital. In addition, regulators also require SIFIs to formulate and implement effective risk management policies to enhance their ability to respond to crises.

The Financial Stability Board (FSB) is an important institution for macroprudential management worldwide, responsible for coordinating financial regulatory policies of various countries and maintaining the stability of the global financial system. The FSB has developed and promoted a series of macroprudential tools, such as countercyclical capital buffers, leverage ratio limits, and supervision of systemically important financial institutions. The implementation of these tools helps to reduce the accumulation of systemic risks and enhance the risk resistance of the financial system.

The effectiveness of macroprudential management depends on the monitoring and assessment of systemic risks. Regulators regularly assess the risk level and contagion effect in the financial system by establishing a systemic risk monitoring framework. Monitoring indicators include the capital adequacy ratio, leverage ratio, liquidity ratio, market risk exposure, etc. of financial institutions. In addition, regulators should also pay attention to the liquidity status of financial markets, asset price fluctuations and behavioral changes of market participants, and timely discover and warn of potential systemic risks.

The effective implementation of macro-prudential policies requires close coordination and cooperation among regulators of various countries. Due to the globalization of financial markets and the cross-border operations of financial institutions, systemic risks have cross-border contagion effects. Therefore, regulators of various countries should strengthen information sharing and policy coordination to ensure the consistency and synergy of macro-prudential policies on a global scale. In addition, regulators should establish a cross-departmental coordination mechanism to deal with systemic risks to ensure rapid response and effective response when crises occur.

In summary, capital adequacy management, liquidity management and macro-prudential management are important strategies for financial supervision. Through the implementation of these strategies, regulators can effectively control the risks of financial institutions and improve the robustness and risk resistance of the financial system. In the future, with the development and innovation of financial markets, regulatory policies and strategies also need to be continuously optimized and improved to cope with emerging risks and challenges and ensure the stability and security of the financial system.

6. CONCLUSION

The risk control and regulatory policies of financial institutions are important means to ensure the stability and security of the financial system. Through scientific risk classification, effective risk control strategies and strict regulatory policies, financial institutions can better cope with various risk challenges. Future research can further explore the prevention measures for emerging risks (such as cyber risks) and improve the overall risk management level of financial institutions. At the same time, with the development of financial technology, how to strike a balance between innovation and regulation is also a topic worthy of in-depth study.

REFERENCES

- [1] Malhotra, Yogesh. Stress Testing for Cyber Risks: Cyber Risk Insurance Modeling beyond Value-at-Risk (VaR): Risk, Uncertainty, and Profit for the Cyber Era. SSRN, 2017.
- [2] Alexander, Carol, ed. Market Risk Analysis, Boxset. John Wiley & Sons, 2009.
- [3] Duffie, Darrell, and Kenneth J. Singleton. "Credit risk: pricing, measurement, and management." Credit Risk. Princeton university press, 2012.
- [4] Holmström, Bengt, and Jean Tirole. "Private and public supply of liquidity." Journal of political Economy 106.1 (1998): 1-40.
- [5] Merton, Robert C. "On the pricing of corporate debt: The risk structure of interest rates." The Journal of finance 29.2 (1974): 449-470.

- [6] Oldfield, George S., and Anthony M. Santomero. *The place of risk management in financial institutions*. Vol. 39. Wharton School, University of Pennsylvania, 1995.
- [7] Hull, John. *Risk management and financial institutions*,+ Web Site. Vol. 733. John Wiley & Sons, 2012.
- [8] Calluzzo, Paul, and Gang Nathan Dong. "Has the financial system become safer after the crisis? The changing nature of financial institution risk." *Journal of Banking & Finance* 53 (2015): 233-248.
- [9] Hirtle, Beverly, Til Schuermann, and Kevin J. Stiroh. "Macroprudential supervision of financial institutions: lessons from the SCAP." FRB of New York Staff Report 409 (2009).
- [10] Islam, Mazhar M. "Regulations and supervision of financial institutions in GCC countries." *Managerial Finance* 29.7 (2003): 17-42.
- [11] Llewellyn, David T. "Institutional structure of financial regulation and supervision: the basic issues." Paper dipresentasikan pada World Bank seminar "Aligning Supervision Structures with Country Needs" tanggal. Vol. 6. 2006.
- [12] Charles, Mordi N. "Institutional framework for the regulation and supervision of the financial sector." *Bullion* 28.1 (2004): 5.
- [13] Elamer, Ahmed A., and Ismail Benyazid. "The impact of risk committee on financial performance of UK financial institutions." *International Journal of Accounting and Finance* 8.2 (2018): 161-180.
- [14] Aloqab, Abdullab, Farouk Alobaidi, and Bassam Raweh. "Operational risk management in financial institutions: An overview." *Business and economic research* 8.2 (2018): 11-32.
- [15] Elamer, Ahmed A., and Ismail Benyazid. "The impact of risk committee on financial performance of UK financial institutions." *International Journal of Accounting and Finance* 8.2 (2018): 161-180.
- [16] Di Renzo, Bernard, et al. "Operational risk management in financial institutions: Process assessment in concordance with Basel II." *Software Process: Improvement and Practice* 12.4 (2007): 321-330.
- [17] Ellul, Andrew, and Vijay Yerramilli. "Stronger risk controls, lower risk: Evidence from US bank holding companies." *The journal of finance* 68.5 (2013): 1757-1803.
- [18] Sato, Yuri. "Bank restructuring and financial institution reform in Indonesia." *The Developing Economies* 43.1 (2005): 91-120.
- [19] Hall, Matthew, Anette Mikes, and Yuval Millo. "How do risk managers become influential? A field study of toolmaking in two financial institutions." *Management Accounting Research* 26 (2015): 3-22.
- [20] Suh, Joon B., Rebecca Nicolaidis, and Richard Trafford. "The effects of reducing opportunity and fraud risk factors on the occurrence of occupational fraud in financial institutions." *International Journal of Law, Crime and Justice* 56 (2019): 79-88.