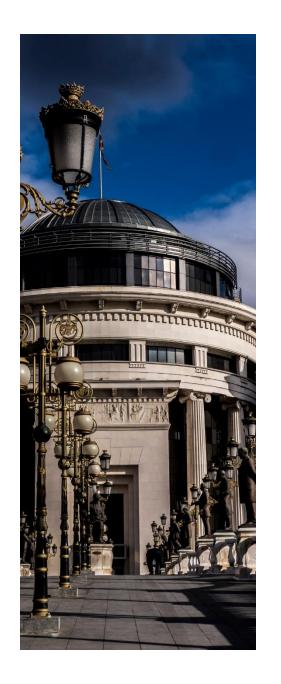


AGENDA

& Objectives

Exploring the possibilities opened up by Fintech, examining the challenges and sharing North Macedonia's journey to developing a National Fintech Strategy



Global & Regional Fintech Developments

Examining Fintech developments globally and in the region post COVID 19

Landscaping Fintech in RNM

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Journey to National Fintech Strategy

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Fintechs innovators thus far





Fintech is Accelerating

Key Drivers Accelerating Fintech, Globally

- 1. COVID 19 accelerate digital transformation
- 2. Changing Consumer Demand
 - 50% of World's population is under 30 & digitally native (University of Cambridge & World Bank)
- Technology Advances
 - Mobile & Internet channels
 - AI, Machine Learning & Bid Data Analytics
 - Blockchain & Distributed Ledger
 Technologies
 - Cloud Computing



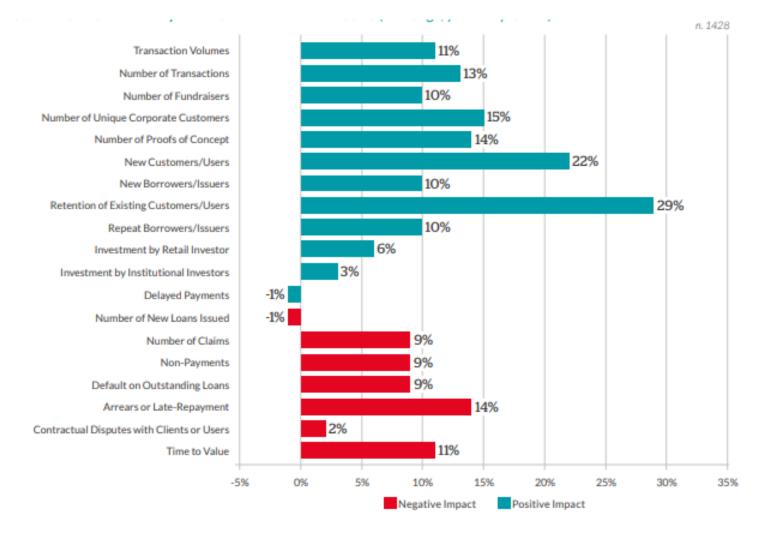


State of Global Fintech by Market Performance Indicators (%change, year-in-year H1)

COVID 19 – A Positive Impact

Fintech continue to thrive

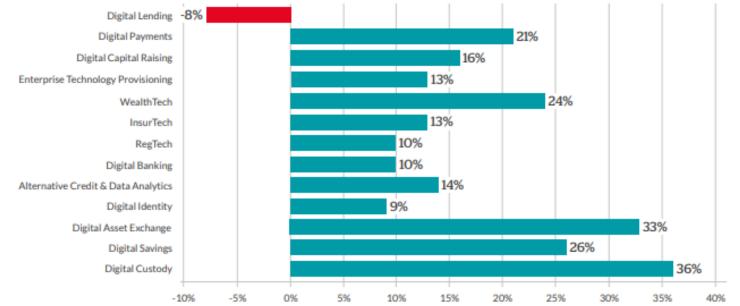
- 11% growth in transaction volume
- 12% growth in transaction numbers
- Indicating a consumer and SME shift to Digital & building trust in Fintech
- 22% acquisition of new customers
- 29% increase in retaining customers
- However, loan defaults and late payments are inevitable







Transaction Volumes, All Fintech Verticals (% change, year-on-year H1)



Specific Areas of Growth

All Verticals Perform Well

- Lending is the only vertical shrinking
- Highest growth areas include:
 - Digital custody Mobile, Web and Tablet Wallets
 - Digital exchanges & trading
 - Digital savings, including micro savings
 - Wealthtech on the rise

Source: World Bank & Cambridge Centre for Alternative Finance: Fintech Innovation in the Western Balkans.



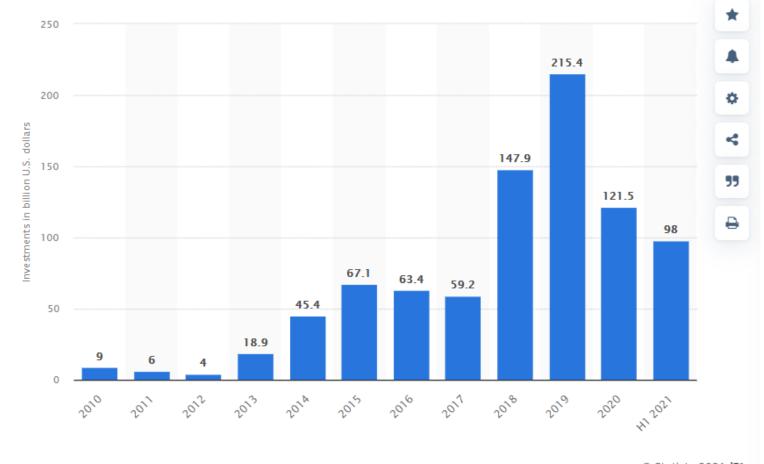


Investments in Fintech Globally

Down but not out!

- Surge in Fintech funding from 2010 to 2019
- COVID 19 see a one third drop in funding

Total value of Investments into Fintech companies worldwide from 2010 to 1st half of 2021 (in billion U.S. Dollars)













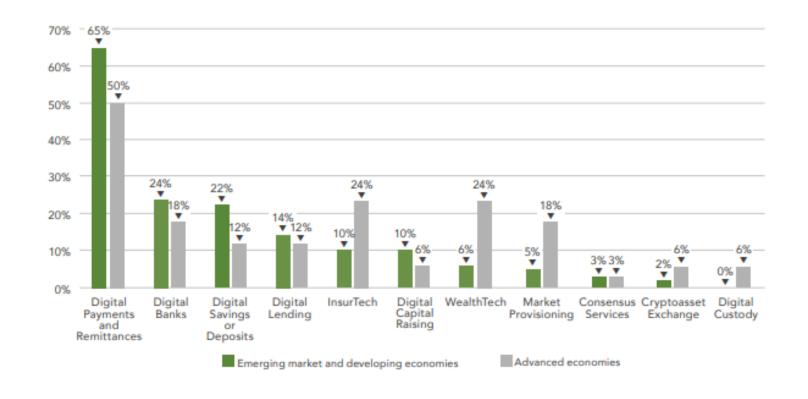


% of Regulatory respondents reporting an increase in Fintech usage or offering in light of COVID – Emerging Market vs Advanced economies (N=97)

Post Covid Impact

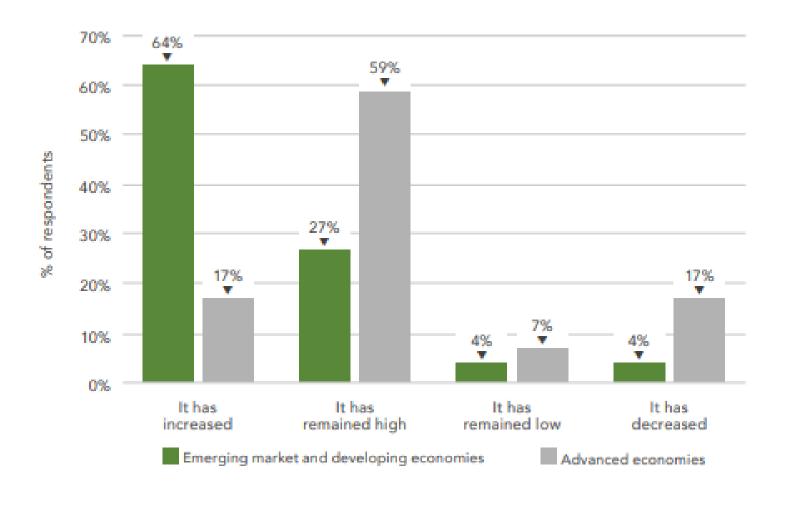
Regulator's Perspective

- Surge in digital payments and remittance
- Digital banks & savings on the rise
- Emerging markets seeing higher rates of growth





Priority of Fintech within regulators in light of COVID – Emerging Market vs Advanced economies (N=72)



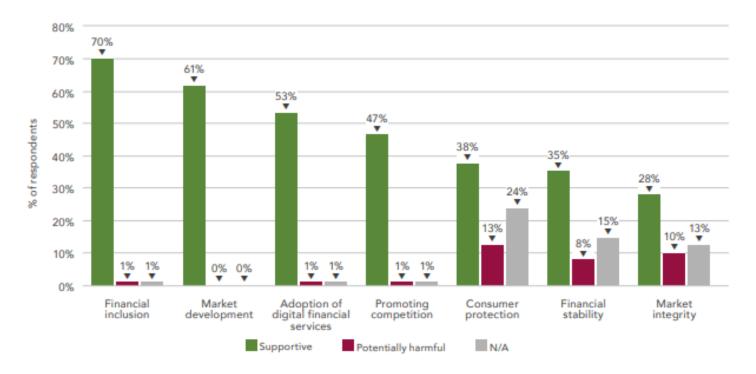
Fintech – A High Regulatory Priority

- COVID 19 has increased prioritisation of Fintech for All Regulators
- Central Banks have prioritise Fintech developments higher than other regulators (payments driven)
- Emerging markets have prioritised
 Fintech over Advanced Economies





Perceived impact of Fintech on Regulatory Objectives in light of COVID 19 (N=88)



Source: World Bank & Cambridge Centre for Alternative Finance: Fintech Innovation in the Western Balkans.

Impact of Fintech

Regulatory Perspective

- Financial Inclusion driver
- DFS in incumbents
- Market developments

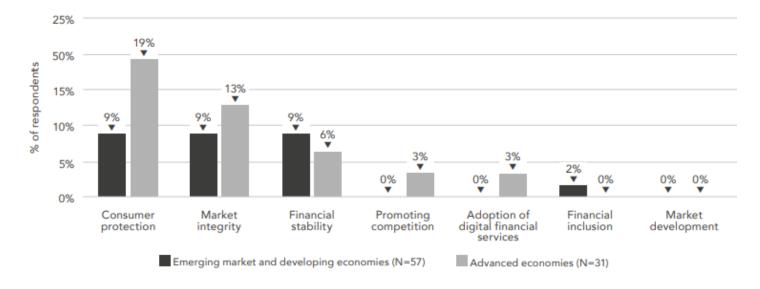
However

- Concerns about
 - Consumer protection
 - Financial Stability and
 - Market Integrity





Perceived Negative Impact of Fintech on Regulatory Objectives in light of COVID 19 (N=88) – Emerging Markets vs Advanced Economies



Source: World Bank & Cambridge Centre for Alternative Finance: Fintech Innovation in the Western Balkans.

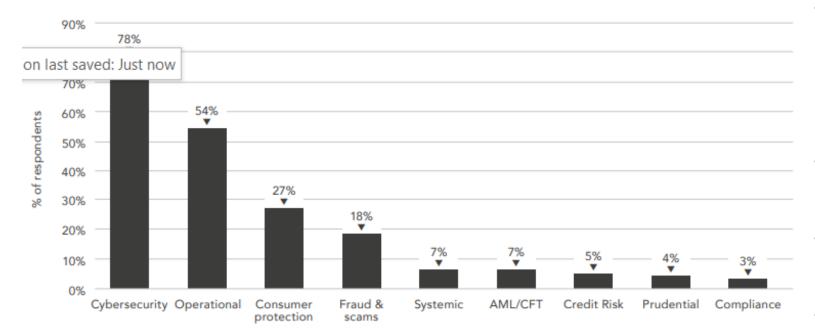
Perceived Negative Impact of Fintech

Regulatory Perspective

- Advanced economies are more concerned about consumer protection (19% vs 9%)
- 13% of Advanced economy participants see Fintech as potentially harmful to market integrity
- More Emerging Market participants (9%) are concerned that Fintech can negatively impact financial stability
- 2% of Emerging Market participants see Fintech as a threat to financial inclusion



Top perceived increasing Fintech risks in light of COVID 19 (N=92)



https://www.jbs.cam.ac.uk/wp-content/uploads/2020/10/2020-ccaf-report-fintech-regulatory-rapid-assessment.pdf

Perceived Risks of Fintech

- Cybersecurity is the highest perceived risk of Fintech post COVID (Advanced economies (90%) more concerned about this risk than Emerging Markets (73%))
- Operational risks and consumer protection is of concern
- AML/CFT does not seem to be a major concern
- Regulators are confident about compliance by Fintech newcomers

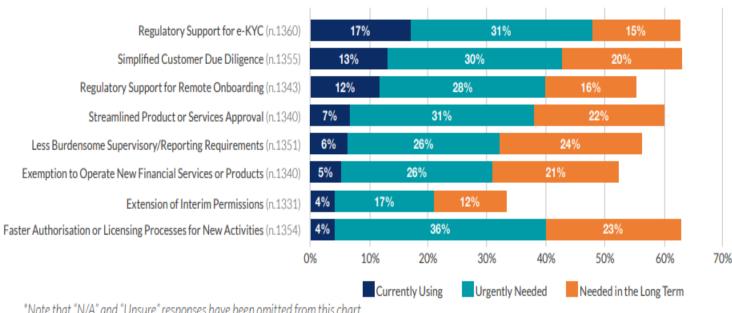


Fintechs want more **Regulatory Support**

Regulators are Accommodating Innovation

- Faster licensing
- Easing of regulatory requirements for smaller firms
- Simplified customer due diligence & remote onboarding

Regulatory Responses & Intervention, (% respondents)



*Note that "N/A" and "Unsure" responses have been omitted from this chart









Western Balkans

DEMAND FOR FINTECH

- Financial inclusion is low at 61.3% compared to
 95.3% in Europe
- Online payments increased by 7%
- However, only 8% used online banking services
 (58% in Europe)
- 80.3% of households have internet access
- 98.8% SIM card penetration
- Significant Market Potential for Fintech and Incumbent innovators

2019 / 2018	Household level of internet access	Use online banking (%)	Make internet purchases	Don't make online purchases; payment security concerns	Individuals with basic or above basic digital skills	Employed ICT specialists (,000)
Albania	:/2018	:/2	5	:	28 / 21	:
Bosnia and Herzegovina	72 / 69	5/5	23 / 18	5/:	24/:	:
Kosovo	93 / 93	5/1	30/22	12/9	28 / 21	:
North Macedonia	82 / 72	15/9	29 / 25	12 / 16	32 / 32	12 / 12
Serbia	80 / 73	18 / 15	34/35	6/9	46 / 39	68 / 64
Montenegro	74/72	3/2	16/12	15/21	:/50	5/5
Bulgaria	75 / 72	9/7	22/21	3/6	29 / 29	96 / 71
Croatia	86 / 83	47 / 41	49 / 41	14/20	49 / 50	166 / 156
Romania	84 / 81	8/7	23/20	3/8	31 / 29	190 / 185
European Union 28	90 / 89	58 / 54	63 / 60	6/7	58 / 57	9,000 / 8,500



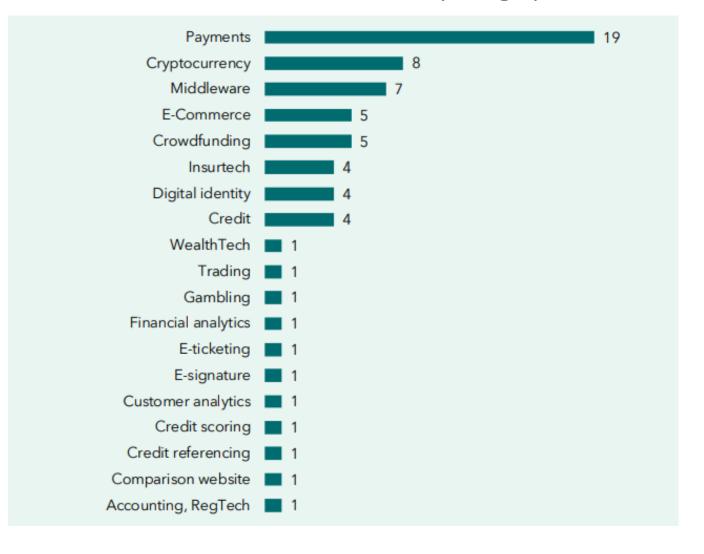


Fintech in Western Balkans

Developing at a steady pace

- 67 Fintech providers in June 2019
 - 35 in Serbia
 - 11 in Albania
 - 7 in North Macedonia
 - 7 in Bosnia and Herzegovina
 - 4 in Kosovo
- Majority in Payments space
- 25 firms applying for licensing (mainly in Bosnia & Herzegovina, Serbia & Albania)

Western Balkan Fintech Firms by Category





Promoting Innovations & Competition Regulatory Mandate

Promotion of competition & innovation is rarely a formal statutory objective for regulators in Western Balakans



Innovation Office

- North Macedonia
 - Montenegro
- Others have single point of contact



Regulatory Sandbox

- Securities Commission of Montenegro (Sept 2019)



Fintech Enabling **E-Commerce**

Barriers & Challenges

Licensing

E-Commerce firms need license in Montenegro and Bosnia and Herzegovina – Deter European e-**Commerce Retailers**

Fewer Payment Gateways

Low competition means higher transaction cost for consumers and payment processing for merchants

E-Signature

Consumers forced to pay cash on delivery due to lack of e-signature and online contracting

	Paid cash on delivery for internet purchase		
Albania			
Bosnia and Herzegovina	77.7		
North Macedonia	46.0		
Serbia	78.1		
Montenegro	41.6		
Kosovo	74.3		
Romania	69		
Croatia	42		
Bulgaria	64		

Source: World Bank & Cambridge Centre for Alternative Finance: Fintech Innovation in the Western Balkans

〈 19 **〉**







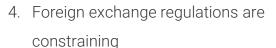
Some Regulatory Challenges

For Developing Fintech





- 1. PSD 2 still not in operation
- 2. More challenging for nonbank payment providers and e-money institutions to come to market
- 3. Strong banks dominate payments no regulatory incentive to allow non-bank payment providers





P2P Lending

- Regulatory uncertainty around P2P regulation and licensing
- 2. Only North Macedonia currently allow P2P Lending
- 3. Uncertainty as to whether platform or lender needs to be licensed



Crowdfunding

- 1. Does prospectus regime apply?
- 2. Do collective investment scheme regulation apply, or can they be carved out?
- 3. Are they an investment broker and need a license for this?





Some Regulatory Challenges

For Developing Fintech





Crypto - Assets

- 1. Regulatory uncertainty of how to regulate crypto assets.
- 2. Amid vibrant market developments
- 3. Citizens are engaging with foreign crypto firms without protection
- 4. Some (e.g. Kosovo) have banned crypto assets





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RESPONDENTS to SURVEY

220 SURVEY RESPONDENTS

Government

2 Respondents + 3 Interviews

Regulators

35 Respondents from 4 Regulators

Incumbents

43 Bank & 89 Non Bank Respondents

Entrepreneurs

11 Alt Finance, 7 Entrepreneurs,

Demand

Consumers &
Businesses Want
Change and Use Fintech
Products & Services

Infrastructure

9 IT Firm Respondents

Investors

Fund for Innovation & Entrepreneurship

Accelerators / Supporters

3 Accelerators, 7 Associations, 9 NGOs / 5 Other e.g. consultants

Talent

Institutions Develop &
Nurture Constant Flow
of Highly Skilled Talent
that Drive
Transformation





North Macedonia FINTECH ECOSYSTEM







Incubators, Accelerators and Tech hubs supporting Entrepreneurs and

Intrapreneurs













Capture Various PERSPECTIVES

1

Drivers Forcing Change

Without compelling drivers forcing change, the industry has very little change of success

Drivers could be needs driven, for example financial inclusion, economic prosperity, etc 2

Assessing
Environment &
Ecosystem

Is the environment conducive to change?

Is there a Fintech supportive ecosystem and & what does it look like?

Government & regulator attitude to financial transformation

Digital transformation at

3

Exploring Benefits that Fintech can bring

Fintech is not worth pursuing if they don't bring real tangible benefits

Benefits can be a catalyst to changing hearts & minds & driving initiatives

4

Examining Barriers & Challenges

Explore barriers such as

Regulation / Licensing

New risks introduced

Lack of access to infrastructure, such as payment system, bank accounts

Risks, Costs & Funding

5

Formulating Strategic Recommendations

Based on research, formulate strategic pathways (recommendations) for discussion with stakeholders.

Assess appropriateness and workability of strategies in RNM context.



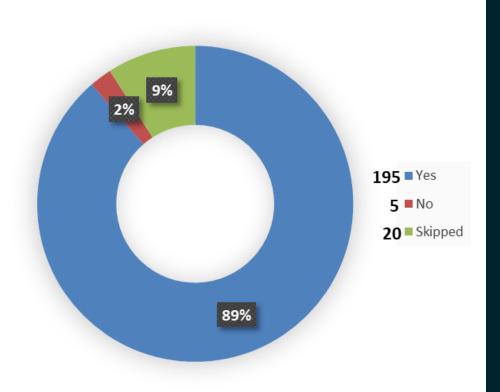




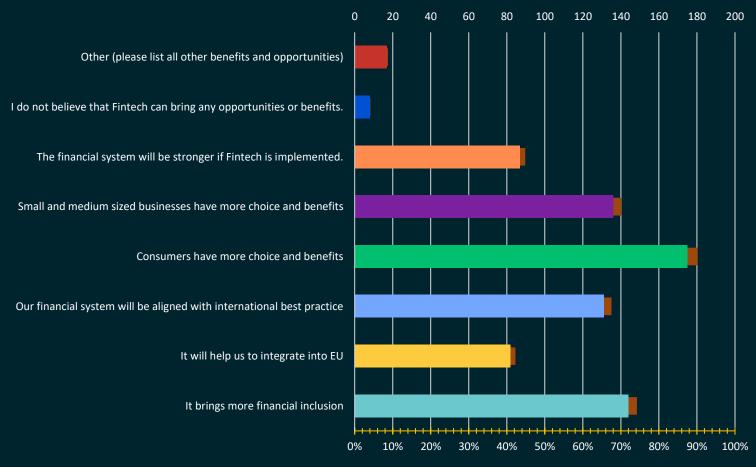




NEED for FINTECH





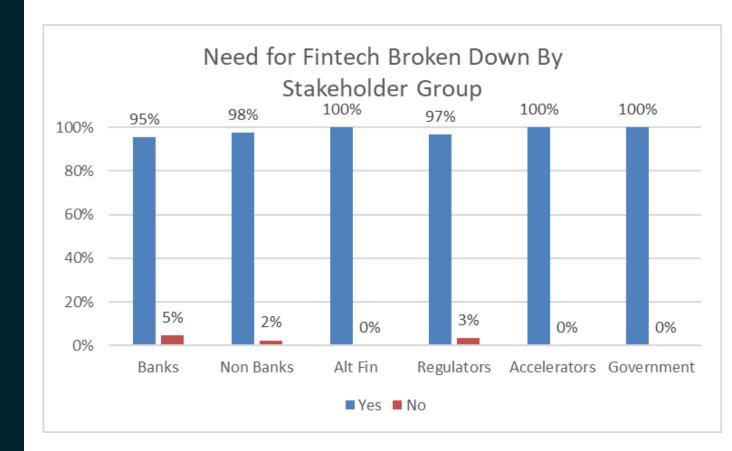




Rationale for "No"

- Traditional players have capacity to meet customer need
- Already highly competitive space with low growth and profitability
- Market is too small
- People are not ready to adopt Fintech solutions
- Cyber risks

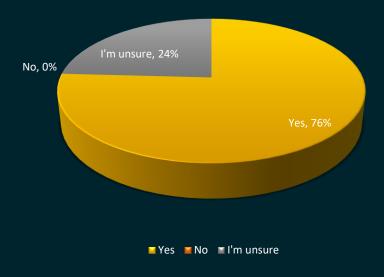
NEED for FINTECH





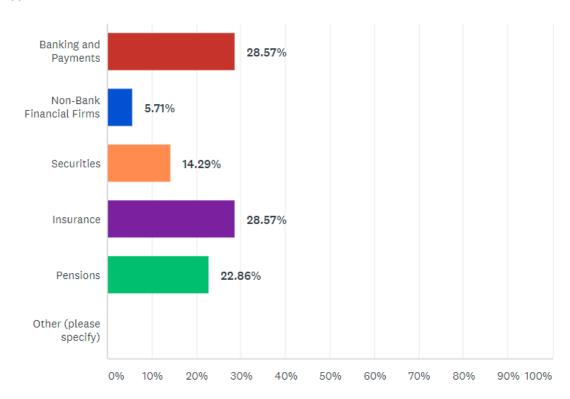
Progressive REGULATOR

Should Regulators be Open to Fintech Newcomers?



What best describes the sector that you regulate?

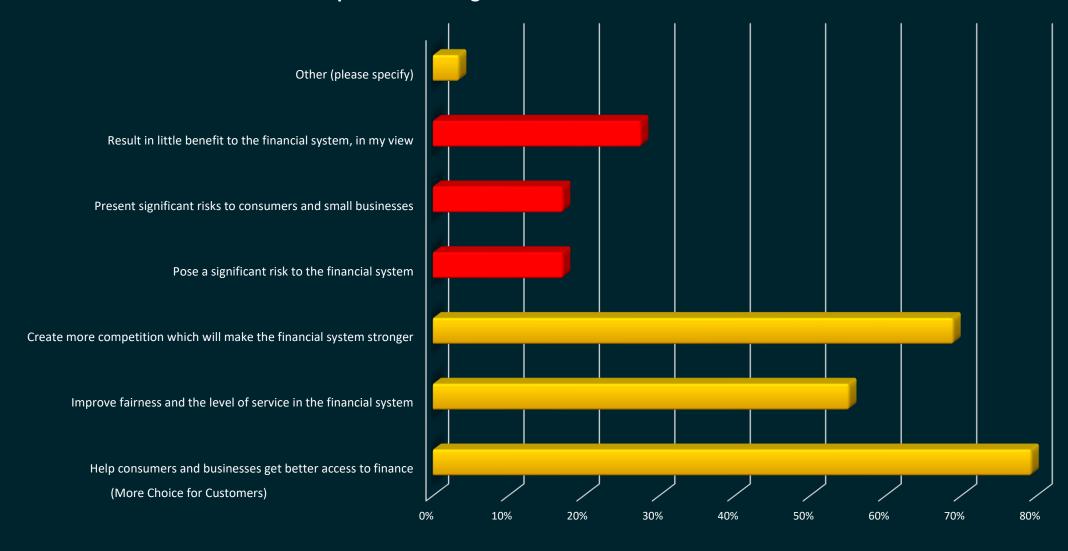
Answered: 35 Skipped: 0





REGULATORS see POSITIVE IMPACT of FINTECH

Impact of Allowing Fintech Newcomers or Innovation

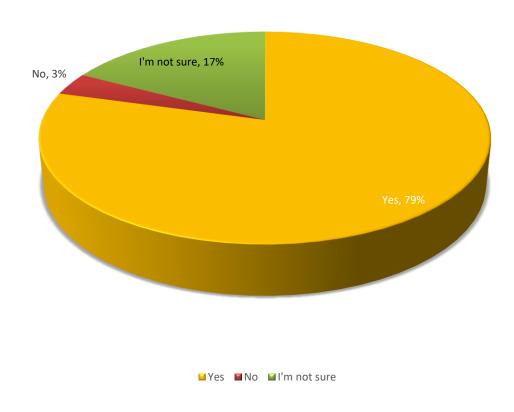




REGULATORS Support a SANDBOX

- However, they need legislative support to allow experimentation
- New legislation that provide legal ground for functioning of a Sandbox
- Consumers / End Users must be afforded regulatory protection while transacting during sandbox testing

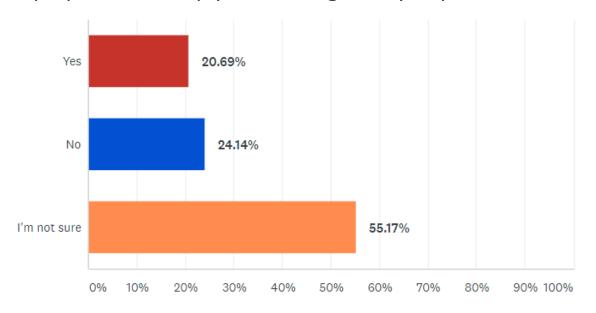
Support Developing Regulatory Sandbox?





Will FINTECHS COMPLY?

Do you believe that Fintech newcomers are adequately prepared to comply with all regulatory requirements?



Yes

- North Macedonian Fintech firms will follow international firms. who are complying
- If regulation is tailored to their needs, they will be more likely to comply

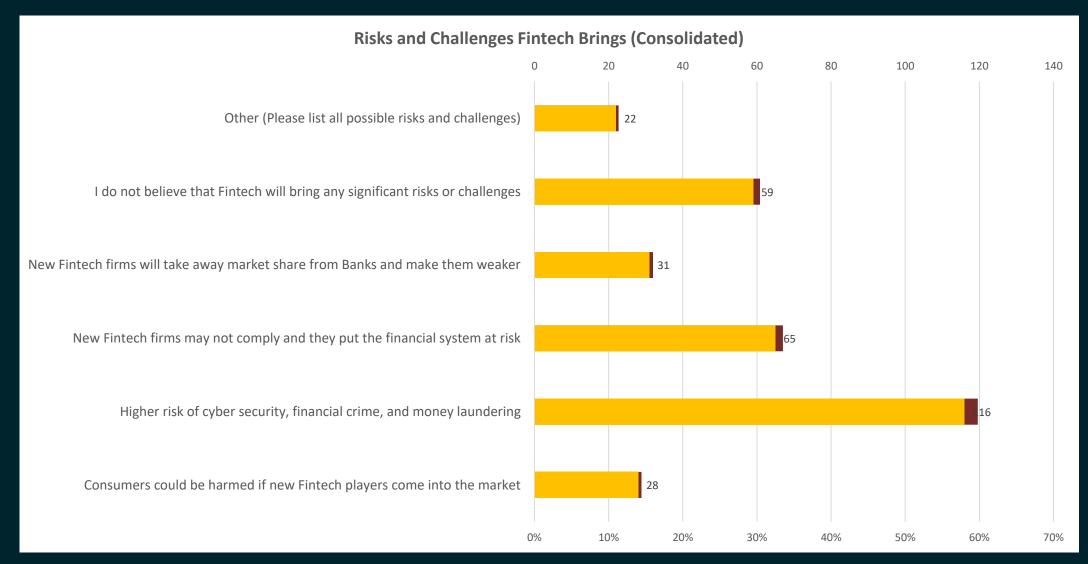
No

- Fintech firms do not fully understand regulatory requirements
- Current regulatory framework is too burdensome
- Smaller companies who may not have compliance resources
- Conflict between market traction & compliance





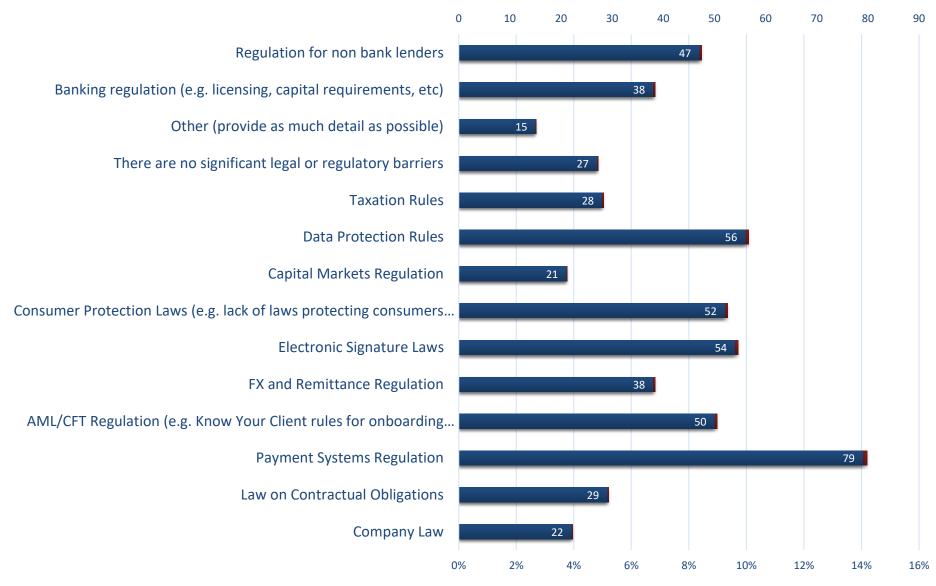
RISKS & CHALLENGES of FINTECH





LEGAL & REGUALTORY BARRIERS

Biggest Legal & Regulatory Barriers



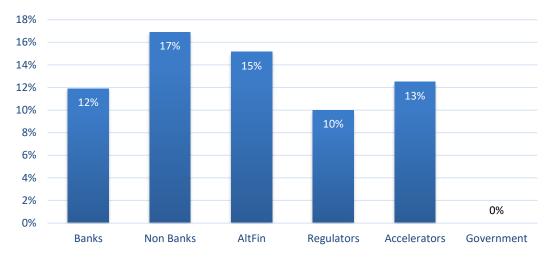




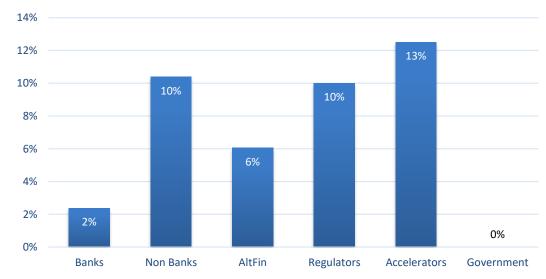
OTHER REGULATORY OBSTACLES

- Impractical & changing regulatory landscape
- Insurance Regulation (Solvency II)
- Inflexible Labour Law
- Sometimes laws can be overly protective or restrictive
- No specific legal framework for Fintech
- Overlapping regulatory requirements and supervision

There are no significant legal or regulatory barriers



Other (provide as much detail as possible)





/Suggestions

To Develop Fintech in RNM



CREATE DEMAND FOR FINTECH



SUPPORTING INNOVATION



COORDINATED EFFORTS



REMOVING BARRIERS to ENTRY

EDUCATION

Financial literacy and creating awareness and trust in Fintech solution

EMPOWER

Empower
entrepreneurs and
innovators with
support / More
accelerators

COMMON PURPOSE

Better coordination of
Fintech initiatives to
ensure a successful
outcome

CONDUCIVE

Lower Regulatory Requirements Regulatory Support

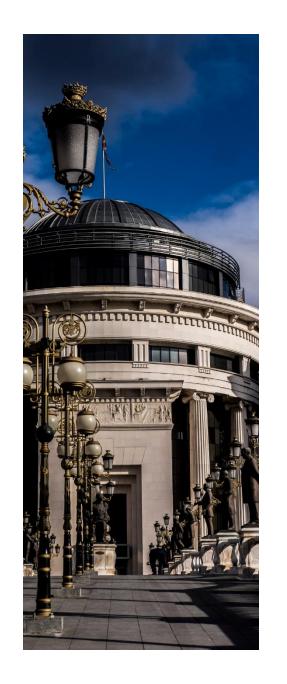




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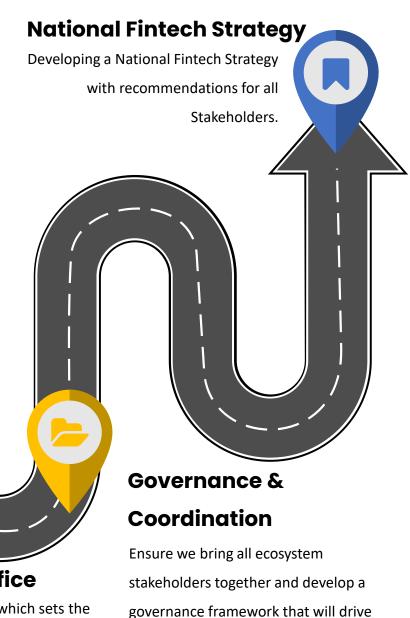
NBRNM Roadmap

Landscaping

development

Understand the current landscape and

how conducive it is to Fintech



action

Regulatory Education

Understanding the opportunities

& challenges of Fintech

Innovation Office

Fintech working group which sets the Innovation Gateway as a platform for engaging with Fintech









Our Journey Thus Far

- Innovation office representatives from different
 Departments within the Bank
- Almost 30 queries received since the start of the Innovation Office
- Most of them related with the innovations in the payment area, but questions for clarification for crypto-assets as well
- Coordination with regulators and other stakeholders
- Senior Management Engagement





Structuring Innovation Hub & Sandbox

Joint and Joined Up Approach

- Cross Regulatory Innovation Hub and Sandbox
- Seamless engagement for Fintech & Incumbent Innovators
- Facilitate cross regulatory testing and licensing of ideas
- Ensure consistency in support, testing and licensing







Key Opportunities Driving RNM Ahead

- Competition
- Financial Accessibility (increasing depth of the market)
- Financial Stability (increasing breadth of the market)
- Motivate incumbents to transform and tap into untapped markets

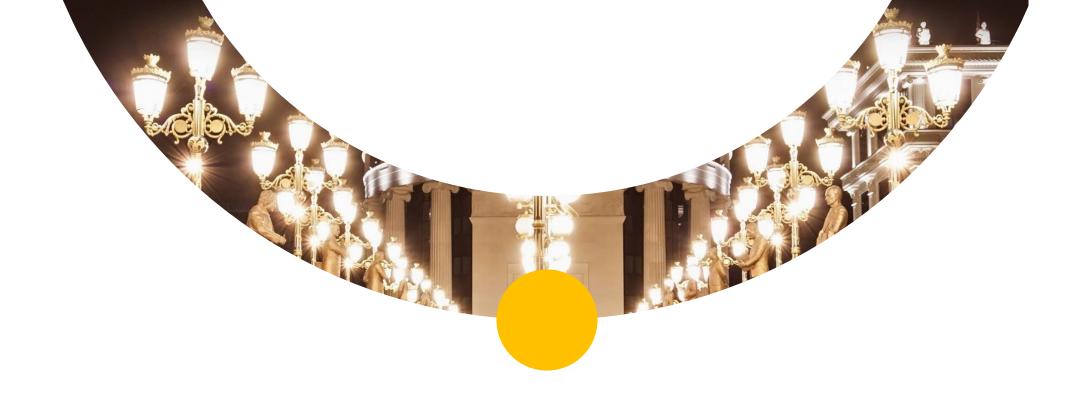


Key Challenges

Addressing Concerns

- Governance & Coordination
- Capacity Building
- Resourcing
- Risk assessment Consumer and risk to financial stability
- Broad range of innovation landing on our desk





THANKS!

Any QUESTIONS?

