

## **Growth of Non-Bank Trade Finance**

### **Abstract**

*The rise of non-bank trade finance has been especially noticeable in the last decade. Many commodity and e-commerce companies are rapidly entering this arena as sovereign guarantees and collaterals take a backseat making it harder for banks to apply traditional models while lending to businesses. Non-banks which are more nimble occupy space vacated by banks. Increasingly, though, banks have begun to collaborate with non-banks, particularly fintech companies for rapid processing of transactions. Besides, trade finance field is itself developing its own specialised areas such as commodity finance, power generation and financial services. Growth in each field depends on the extent of specialised knowledge, developments in capital markets, innovations by technological service providers permitting new collaborations and a dynamic regulatory framework including self-regulation for assessing and disclosing emerging risks.*

*Keywords: Non-Bank Trade Financiers, Financial Supply Chains, SME financing, Peer-to-Peer Lending, Trade Finance Risk Assessment and Disclosure*

### **Introduction**

The landscape of trade financing has altered rapidly with non-bank institutions and even open account dealings between trading firms coming to the fore since the turn of the century. Earlier, with instruments such as Letters of Credit or Bank Discounting of trade receivables, much of the commercial risks were handled by the banking sector. Today, there are institutions, chiefly dealing with supply chain finance which understands specific factors affecting value realizations at each stage of supply chain that put them in a position to provide such working capital finance due to advancements in digitization that enable risk-sharing and risk transfer much more easily.

### **The Rise of Financial Supply Chains**

Although digitization has helped the growth of financial supply chains, the key element has been the growth of specialized institutions that understand specific businesses and pricing factors thereof. Commodity finance, for example, has become the forte of trading companies such as Sumitomo Mitsui which have set up their own banking corporations that have at least three verticals – agriculture, metals & mining and energy. As against simply pre-shipment and post-shipment finance, specific stage financing may, in addition, be inventory finance or receivable finance that may include warehouse receipt finance. Since commodity prices may be highly volatile, institutions may insist on over-collateralization or increased pricing due to their own need to hedge for risks. The default rates, though, are lower as credit lines are backed by underlying commodity flows. In all supply chain finance, after the invoices are accepted, they are put up on the digital platform and there will be financiers ready to finance

such invoices without even discounting them. Such digitization, thereby, helps the supplier to receive early finance on easier terms as risk is divided into several components. The client is similarly able to extend credit terms without any impact on credit pricing. E-commerce giants such as Alibaba have also entered the fray providing supplier finance to Chinese companies and buyer finance to, for example, British companies purchasing goods from Chinese manufacturers. ICICI Bank in India in 2015 partnered with Alibaba for the launch of the online trade facilitation centre to provide easier finance in terms of rates and discounts to the small and medium enterprises in India who are members of Alibaba.com. Internet giant, Baidu, often referred to as China's Google, has partnered with Citic Bank to launch an online bank and take on its rivals – Alibaba and Tencent. Hence, in China, we have online banks such as Baixin Bank, WeBank and MyBank by Baidu, Tencent and Alibaba respectively. Leveraging with other banks gives them the advantage of their reach in terms of geography as well as number of customers. In a short space of time, these online banks have moved into cloud computing and data services apart from online payments. This also shows that supply chain finance is successful only when suppliers do not otherwise have ready access to liquidity. Even before the supplier can seek invoice financing, the ordering company arranges supplier finance from either a bank or a non-bank institution.

#### Key Trade Financiers

League tables put out by [www.tradefinanceanalytics.com](http://www.tradefinanceanalytics.com) show the following key trade financiers by deal size in the first quarter of the year 2016. Alibaba is right at the top with a deal size of \$4 billion. Other key non-bank trade finance deals include commodity, shipping and leasing companies. Interestingly, the Omani government and the Panama government have been the other key trade finance borrowers.

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**Table 1**  
**All Lenders – Quarter 1, 2016**

Transaction Name	Borrower	Date Reported	Transaction Country	Transaction Region
Alibaba/\$4 billion/0316	Alibaba Group	16/03/2016	China	Asia & Pacific
Oman government/\$2 billion/0416	Oman Government	27/04/2016	Oman	Africa & Middle East
CMDT/XOF32.92 million/0416	Compagnie malie...	27/04/2016	Mali	Africa & Middle East
Telefonica Moviles Chile/€2.5 billion/0416	Telefonica Moviles...	26/04/2016	Chile	Americas
Navig8 Product Tankers/\$130.3 million/0416	Navig8 Product Ta...	26/04/2016	United Kingdom	Europe
Antofagasta/\$500 million/0416	Antofagasta	26/04/2016	Chile	Americas
Waypoint Leasing/\$100 million/0416	Waypoint Leasing	25/04/2016	United Kingdom	Europe
Subsea 7/\$750 million/0416	Subsea 7	25/04/2016	United Kingdom	Europe
CSSC (Hong Kong) Shipping Company/\$24...	CSSC (HK) Shippi...	26/04/2016	Hong Kong	Asia & Pacific
Aela Energia/\$400 million/0416	Aela Energia	25/04/2016	Chile	Americas
Panama Government/\$2.6 billion/0416	Panama Governm...	22/04/2016	Panama	Americas
Olam/\$175 million/0416	OLAM Group	21/04/2016	India, Nigeria	Africa & Middle Ea...
Molino Canuelas/\$80 million/0416	Molino Canuelas	21/04/2016	Argentina	Americas
Alkane Resources/\$600 million/0416	Alkane Resources	21/04/2016	Australia	Asia & Pacific
Central Africa Building Society/\$25 million/0...	Central Africa Buil...	26/04/2016	Zimbabwe	Africa & Middle East
Zesco/\$122 million/0416	Zesco	20/04/2016	Zambia	Africa & Middle East
Chorus/NZ\$675 million/0416	Chorus	20/04/2016	New Zealand	Asia & Pacific
Russian Copper Company/\$100 million/0416	Russian Copper ...	25/04/2016	Russia	Europe
Yokoyama Kogyo/THB110 million/0416	Yokoyama kogyo	18/04/2016	Thailand	Asia & Pacific
Sembcorp&MMID Utilities/\$250 million/0416	Sembcorp Industri...	15/04/2016	Myanmar	Asia & Pacific
Rosewood Shipping/\$190 million/0416	Rosewood Shipping	15/04/2016	Singapore	Asia & Pacific
Ocean Yield/\$202.5 million/0416	Ocean Yield	14/04/2016	Norway	Europe

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Source: tradefinanceanalytics.com

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As is seen from the list of commercial lenders below, it is seen that while Sumitomo Mitsui Financial Group is the top commercial lender globally, its reach is highest in the Asia-Pacific and the Middle East regions. Deutsche Bank, HSBC and Credit Agricole are the top lenders in Africa. Bank of China, on the other hand, has emerged as the top lender in Europe followed by UniCredit, Societe Generale and ING Group. TD Bank, Bank of America Merrill Lynch and Scotiabank are the most prominent lenders in North America and JP Morgan Chase & Co is at the top spot in South America.

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**Table 2**  
**Global Commercial Lenders by Region and Rank**

Rank	Global	Europe	Africa	APAC	N. America	S. America	Middle East
1	Sumitomo Mitsui Financial Group	<u>Bank of China</u>	<u>Deutsche Bank</u>	Sumitomo Mitsui Financial Group	<u>TD Bank</u>	JPMorgan Chase & Co	<u>Citigroup</u>
2	Mitsubishi UFJ Financial Group	<u>UniCredit</u>	<u>HSBC</u>	Mizuho Financial Group	<u>Bank of America Merrill Lynch</u>	Natixis	<u>Mitsubishi UFJ Financial Group</u>
3	HSBC	<u>Societe Generale</u>	<u>Credit Agricole</u>	Mitsubishi UFJ Financial Group	<u>Scotiabank</u>	BBVA	<u>Sumitomo Mitsui Financial Group</u>

4	Mizuho Financial Group	<u>ING Group</u>	<u>BNP Paribas</u>	Citigroup	<u>BMO Financial Group</u>	Societe Generale	<u>AlAhli Bank</u>
5	Deutsche Bank	<u>Lloyds</u>	<u>Cassa Depositi e Prestiti</u>	Standard Chartered	<u>Mitsubishi UFJ Financial Group</u>	Itau Unibanco	<u>BNP Paribas</u>
6	UniCredit	<u>Rabobank</u>	<u>Mizuho Financial Group</u>	BNP Paribas	<u>Royal Bank of Canada</u>	Deutsche Bank	<u>SMTB</u>
7	BNP Paribas	<u>Royal Bank of Scotland</u>	<u>Nedbank</u>	HSBC	<u>Mizuho Financial Group</u>	Citigroup	<u>Sompo Japan Nipponkoa Insurance</u>
8	Societe Generale	<u>JBIC</u>	<u>Societe Generale</u>	Axis Bank	<u>Wells Fargo</u>	Sumitomo Mitsui Financial Group	<u>Natixis</u>
9	Citigroup	<u>Mizuho Financial Group</u>	<u>DZ Bank</u>	JPMorgan Chase & Co	<u>HSBC</u>	Banco Bradesco	<u>ING Group</u>
10	ING Group	<u>Bank of America Merrill Lynch</u>	<u>Sumitomo Mitsui Financial Group</u>	Mega Bank	<u>Canadian Imperial Bank of Commerce</u>	Mizuho Financial Group	<u>Emirates NBD</u>

84 Source: Compilation from tradefinanceanalytics.com

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86 As is seen in Table 2, all trade financiers have a specialized field of expertise as all financing  
87 requires specialised understanding of the market of the product/service. Thus, while the top  
88 lender Sumitomo Mitsui Financial Group focuses on energy, HSBC focuses on  
89 manufacturing and power generation and ING Group has metals financing as its main  
90 division. Mizuho, another big actor in trade finance focuses on financial services sector and  
91 Deutsche Bank on power generation. The importance to understanding the specifics of each  
92 market is, thus, the key to selecting the area of trade finance. The table also shows that non-  
93 bank entities like Sumitomo Mitsui Financial Group, Mizuho Financial Group and JPMorgan  
94 Chase & Co have emerged as major trade financiers.

95 **Table 3**

96 **Global Commercial Lenders by Sector**

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Rank	Energy	Finance	Mfg	Power Gen	Soft	Metals	Infra
1	<u>Sumitomo Mitsui Financial Group</u>	Mizuho Financial Group	JPMorgan Chase & Co	Deutsche Bank	<u>Mitsubishi UFJ Financial Group</u>	ING Group	Mitsubishi UFJ Financial Group
2	<u>Societe Generale</u>	Bank of America Merrill Lynch	HSBC	HSBC	<u>Sumitomo Mitsui Financial Group</u>	UniCredit	Royal Bank of Canada
3	<u>Mizuho Financial Group</u>	UniCredit	Societe Generale	Sumitomo Mitsui Financial Group	<u>TD Bank</u>	Rabobank	Scotiabank

4	<u>Mitsubishi UFJ Financial Group</u>	Standard Chartered	Credit Agricole	Mizuho Financial Group	<u>Royal Bank of Canada</u>	Royal Bank of Scotland	Bank of America Merrill Lynch
5	<u>ING Group</u>	Citigroup	ING Group	Mitsubishi UFJ Financial Group	<u>Scotiabank</u>	Societe Generale	Citigroup
6	<u>UniCredit</u>	JPMorgan Chase & Co	UniCredit	AlAhli Bank	<u>Morgan Stanley</u>	Lloyds	Mizuho Financial Group
7	<u>Citigroup</u>	Mitsubishi UFJ Financial Group	Sumitomo Mitsui Financial Group	Alinma Bank	<u>Bank of America Merrill Lynch</u>	BNP Paribas	Sumitomo Mitsui Financial Group
8	<u>Lloyds</u>	Goldman Sachs	Bank of America Merrill Lynch	Banque Saudi Fransi	<u>BMO Financial Group</u>	Natixis	HSBC
9	<u>Rabobank</u>	BNP Paribas	Mitsubishi UFJ Financial Group	Samba Financial Group	<u>Canadian Imperial Bank of Commerce</u>	Citigroup	Credit Suisse
10	<u>Royal Bank of Scotland</u>	Wells Fargo	BNP Paribas	Sumitomo Mitsui Trust Holdings	<u>Rabobank</u>	Abu Dhabi Commercial Bank	Barclays

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Source: Compilation from tradefinanceanalytics.com

### Non-Bank Trade Financiers and SMEs

Access to bank finance has been somewhat of a challenge for small and medium firms, particularly for those that are unable to provide the requisite collateral. As per the WTO report on 'Trade Finance and SMEs' published in 2016, over half of trade finance requests globally made by SMEs are rejected against just 7 per cent for multinational companies. Further, as per the Bank for International Settlements, reduced trade finance could have accounted for as much as two-fifths of the fall in export volumes between the 2008 financial crash and 2014. In developing countries, the challenge is even bigger with the gap in developing Asia estimated at US\$ 700 billion and in Africa at US\$ 120 billion which is approximately one-third of the continent's trade finance market. A number of steps including training of bank officials, monitoring of trade finance provisions and maintaining dialogue with the authorities to ensure that trade and development remain top priorities have been suggested by this report. Nonetheless, SMEs are now turning to non-bank institutions which are more agile and have developed solutions to meet the needs of SMEs. Companies such as General Electric Ltd had floated their own finance subsidiaries which specialised in providing finance to their suppliers and customers. Of course, institutions that were using leveraged funds for trade finance began experiencing difficulties post the 2008 crisis and some such as GE Capital Ltd had to be closed down. Earlier, in Tables 1 and 2, it was seen that Mitsubishi and Mizuho Financial Groups are top commercial lenders. Several hedge funds, too, have entered the fray viewing trade finance as a profitable venture for increasing shareholder wealth. Although margins in trade finance are shrinking rapidly, hedge funds have a size and diversity of business advantage due to which they have been able to structure low-cost

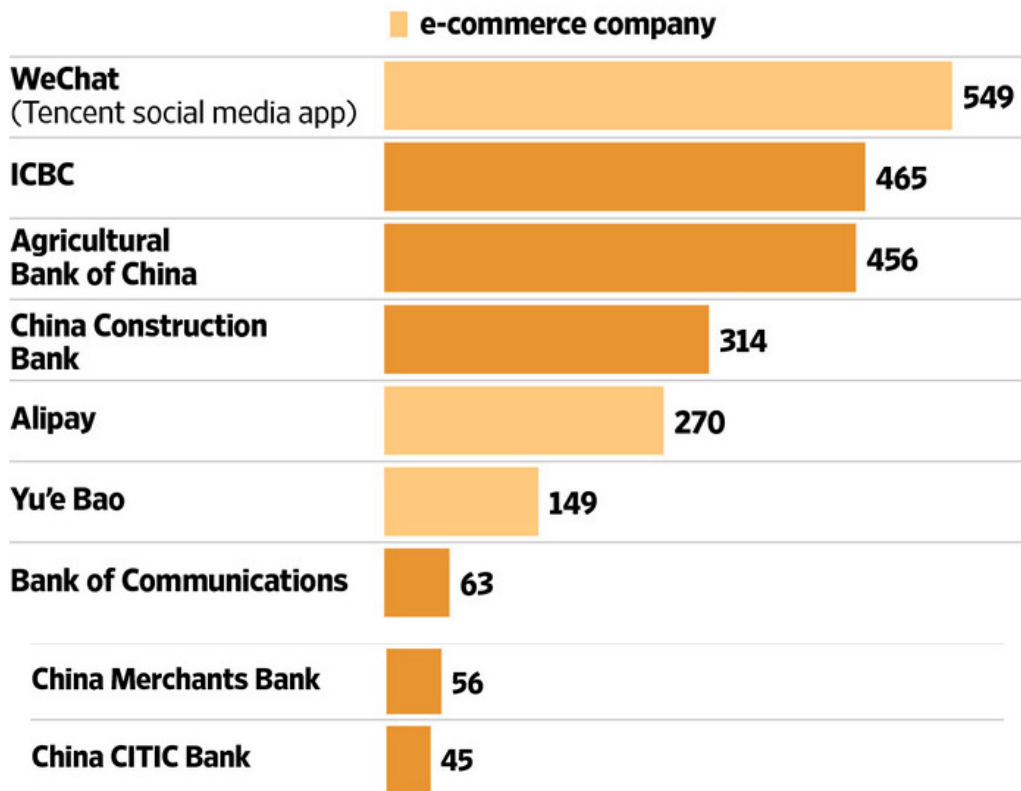
solutions for SMEs. Others like UPS Capital also make use of their network around the world to provide finance to buyers of US goods and services. The latest player in this field that lends to individuals and SMEs, including start-ups, is Incred which is backed by Deutsche Bank's former co-CEO Anshu Jain. As per a survey commissioned by ACI Worldwide and conducted by IDC Financial Insights in 2015, online payment services are accounting for 72.4% of total payments in Asia Pacific, followed by smartphone wallets (32.8%) and mobile money (13.3%) – Digital News Asia, September 29, 2015. As per the survey, the top reason consumers use online payment services is to enjoy faster and more efficient payments (47%), followed by trust in online payments (21%), and better rates compared with other methods of payment (15%). Own words - The Shared Economy, which is built around the sharing of resources, is a major market driver in Asia Pacific. The top three 'shared economy' services across the region are taxi services, aggregated meal delivery and accommodations. Digital methods of payments are set to grow in tandem with shared economy services in Asia Pacific, especially for transactions where convenience, speed and seamlessness are valued. Examples of these transactions include taxi hire and car sharing services where 10% of respondents in the region are already paying for them via smartphone wallets. The region is rapidly moving toward real-time or immediate payments, driven by customers' demand for faster and more efficient payments. Non-financial services are adding to the dynamic competition, extending payments from online and mobile ecosystems into peer-to-peer payments within social apps such as WeChat and Line.

Similarly, in the UK and other places, 'peer-to-peer' lending has picked up whereby firms, instead of lending themselves, create market places to enable the coming together of borrowers and lenders (savers). Some market places may be for purely debt, others for both debt and equity, particularly in start-ups and others may just enable the purchase and sale of receivables. MarketInvoice, Zopa, Prosper etc. were among the first few firms to get into this space and enabled large volumes of transactions on their sites. Unlike USA where banks fund not more than 25%-30% of credit requirements, in Europe and other places, the picture is reverse; hence, the fear has been that even with non-bank finance companies coming in, the gap may just be too wide to be filled by them. Capital markets are another source of funding and banks are only too happy advising on and arranging the raising of capital. However, for smaller firms, the minimum volumes and the transaction costs of entering the capital markets may be too high. Securitisation markets are an answer to this problem wherein the receivables of a group of firms are pooled and securities issued against them to investors. During the financial crisis years, securitisation markets were seen as part of the problem and hence this non-bank money had stopped flowing to the SMEs. Though large firms find it relatively easy to enter capital markets, infrastructure companies though have a problem as their funding needs stretch over multiple decades for which bond investors have very little appetite. Pension funds and insurance companies may be the only saviours for infrastructure companies but their investment in non-corporate or private debt may be restricted. Besides, their expertise in dealing with less credit-worthy investors may have been dwarfed by bank dominance. In India, non-bank finance companies (NBFCs) have scripted a very successful story under the guidelines framed by the central bank. However, their foray into international trade finance is still limited. Chinese e-commerce companies have moved very fast to occupy prime positions in the international trade finance arena. Such companies are also getting the required support from the government which has the goal of boosting

170 consumption through digital finance. Below is a graph showing the top e-commerce  
171 companies in the business of moving money:

## Moving Money

Number of retail customers in 2014, in millions



Source: Citigroup

THE WALL STREET JOURNAL.

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174 China is said to be moving faster than the mobile phone companies such as Apple, Samsung  
175 and Android. A survey released by the Federal Reserve in March 2016 (Consumers and  
176 Mobile Financial Services) revealed that only about 25% of smartphone users in the US had  
177 used their device to make payments in the last one year.

178 Similarly, PayPal Holdings Ltd, a US company holds more customer money than many  
179 leading banks in the US. Such money does not earn any interest and is not insured. It is  
180 ready-to-spend money and PayPal has tied up with several retailers where customers can  
181 shop without any cash payment or use of any debit/credit card. Money gets directly  
182 transferred from PayPal account to the retailer's account. And PayPal has also partnered with  
183 lenders to offer services such as remittance transfer, small business loans and debit/credit  
184 cards. The Xoom international transfer service which it acquired in 2015 permits bill  
185 payments to flow directly from the consumer to utilities or mobile-phone operators. This has  
186 further brought convergence between banking and fintech. Below is a picture of demand  
187 deposits with some non-banks vis a vis banks:

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190 US demand deposits as of Q1, 2016 (billion dollars)

191	Bank of America Corp	427.19
192	J.P Morgan Chase & Co	383.28
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194	US Bancorp	80.27
195	Bank of New York Mellon Corp	71.09
196	Wells Fargo & Co	67.81
197	Citigroup	61.22
198	HSBC North America Holdings Ltd	29.42
199	Deutsche Bank Trust Corp	20.71
200	CapitalOne Financial Corp	15.70
201	PayPal	13.02

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203 Source: Asian Wall Street Journal

204 Banking Collaborations with FinTech Companies

205 These developments show that banks, for their own survival, may have to tie up with non-  
 206 bank finance companies or fintech companies. Private sector banks such as RBL Bank,  
 207 IndusInd Bank and Yes Bank have started giving fintech start-ups access to their Application  
 208 Programme Interface (APIs) so that their systems could be directly integrated with the  
 209 systems in the banks ensuring rapid and smooth sharing of data. Historically, banks have not  
 210 opened up their APIs to other entities but this opening up now enables more retail solutions  
 211 for the customer as all transactions, particularly relating to money transfer and pre-paid card  
 212 business are processed on behalf of banks by fintech companies. Many banks admit that such  
 213 tie-ups have facilitated the efficient handling of transactions but are also aware that it exposes  
 214 the bank's platform to malware which could harm the bank's database. Security, therefore, is  
 215 an important issue for banks opting to tie up with fintech companies. Often, this is handled  
 216 through ensuring that the data is encrypted and obfuscated and also through private secured  
 217 channel and mutual authentication techniques to establish a right connect with third parties.

218 As noted earlier, a slew of startups in the fintech space are disrupting the financial services  
 219 and banking industry. These firms are developing innovations that include peer-to-peer  
 220 lending platforms that match borrowers and savers. They are helping banks to detect fraud  
 221 and money laundering using artificial intelligence and machine learning. Platforms like  
 222 Paytm and BankBazaar.com are developing apps that quickly transfer money and provide a  
 223 wide range of financial products to the consumers. Paytm has also announced to open a  
 224 payments bank in August 2016 in India and issue debit cards to its account holders. Rather  
 225 than lose the game, some banks are, therefore, forming collaborations with payments banks.  
 226 E-commerce companies, too, have tied up with payments banks to facilitate payments and  
 227 refunds. And Paytm is itself an e-commerce player backed by Alibaba which has a 25% stake  
 228 in it. Trade finance is acquiring a truly different dimension.

## 229 Regulation of Trade Finance

### 230

231 Trade finance has historically been used as a risk management tool ensuring that cross-border  
232 business is not affected by late payments or deliveries, geopolitical instability, currency  
233 fluctuations and other known and unknown risk factors. Trade finance providers today not  
234 only need to manage operational and market risks but also risks related with money-  
235 laundering activities and terrorism. Trade finance providers, therefore, now need to do  
236 behavioural profiling of clients and check minutely all transactions subject to sanctions using  
237 complex algorithms as well as verify trading partners' banks as part of KYC (Know Your  
238 Customer) regulations. Compliance with regulations of different jurisdictions means that  
239 business processes must be continually aligned to changes in a bid to mitigate financial  
240 crime. But such compliances also means that there is a realization that banks alone may not  
241 be able to finance growing trade volumes. Besides, additional capital requirements under  
242 Basel III for trade-finance assets, including off-balance-sheet assets has made securitization  
243 of trade finance assets a huge possibility. Commodity trade finance by traditional lenders has  
244 seen a big decline, but the space has quickly been occupied by banks from many emerging  
245 economies including Middle-East countries who have tended to partner with an expert  
246 commodity bank. Syndicated lending by European banks, in particular, are becoming  
247 common with such lending directed to mainly regional banks of developing countries wishing  
248 to get into commodity finance. A number of deals backed by export credit agencies are also  
249 coming into the capital markets. Alternative financiers or non-bank trade financiers have,  
250 therefore, become the new phenomenon in the market. Although these non-banks do not  
251 have to comply with Basel III or liquidity requirements, they, in their own interest, are  
252 finding it prudent to comply with anti-money laundering and counter-terrorism regulations.  
253 But the industry is still afraid of what one may call 'de-globalisation of regulations' with  
254 regulations varying from jurisdiction to jurisdiction creating an un-level playing field and  
255 minimizing risk mitigation opportunities on some deals. In the meanwhile, non-banks or  
256 alternate trade financiers are discovering the merits of the individuality of trade finance asset  
257 class and reaping its benefits.

258 Thus, non-bank institutions have flourished despite the onset of stricter regulatory  
259 frameworks. In India, additional Tier I capital requirements rising to Rs 2 crore in March  
260 2017 and reduced ability to take public deposits to 1.5 times their minimum capital from 4  
261 times that prevailed earlier are unlikely to dent their onward march. This is despite the fact  
262 that many of them with deep linkages to the capital markets have been categorised as  
263 systemically important financial institutions (SIFIs) and are being watched very closely by  
264 the regulator for any risks arising due to counter-party failure or funding and asset  
265 concentrations affecting liquidity and solvency. Apart from their nimbleness, new  
266 technological innovations such as cloud-computing has also served to bring down costs of  
267 offering trade finance and increase capacities due to the use of third-party computing  
268 capability infrastructure which is also continually monitored by them. Smaller players are  
269 leveraging on applications like software as a service (SaaS) to host their entire trade finance  
270 systems on cloud resources. Other applications line infrastructure as a service (IaaS) typically  
271 encompassing on-demand memory management, computational power and secondary storage  
272 and platform as a service (PaaS) whereby customer portals, trade transactional processing  
273 solutions and trade reporting systems can be developed in any programming platform are also  
274 increasingly been used to build new capabilities and enter new territories. Of course, quality  
275 of service delivery and data protection, therefore, now assume a lot of significance. Cloud

suppliers must consciously upgrade their capacity to handle technological platforms and exhibit a great sense of responsibility to address critical business issues while providing services such as application hosting, data centre management, virtual databases, virtual server processing capabilities and storage and business support. Further growth in non-bank trade finance will, thus, depend as much on ethical handling of data as the nimbleness of the operating entities.

Another development that may have some impact on the growth of non-bank trade finance is the introduction of international financial reporting standards (IFRS) on financial transactions. IFRS 9, applicable from January 2018, requires recognition of anticipated losses over the next one year and over the lifetime for all financial assets and not just incurred losses as at present. This may result in reduced capital affecting capital adequacy ratios. Besides additional investments are necessary in risk assessment and evaluation of qualitative data as significant changes in credit risk are to be assessed throughout the lifetime of the financial asset. Besides, all assets and liabilities have to be initially recognised at fair value and after that amortised values may be allowed only if the intention to hold the financial instrument to maturity is proven. Fair value, which has the potential to bring in a lot of volatility in income statements, will thus be dominant in financial reporting for both banks and non-banks providing trade finance. All this also requires huge disclosure on capital management strategies, significance of financial instruments and the risks attached. The growth in trade finance assets, thus, depends on establishing a dynamic regulatory framework and the ability of banks and non-banks to invest in new capabilities and incur the necessary costs.

#### Concluding Observations

Non-bank players have become prominent for providing solutions for non-standard transactions and this, no doubt, requires specialist credit skills. These players are now able to reach their customers online and are, therefore, not inhibited by the lack of a distribution channel. Besides, Basel III liquidity requirements have made it easier to hold trade finance assets for non-banks. These non-banks have alternative capital structures with equity coming from private sources of funds including hedge funds. Invariably, most of them manage long-term risk through multiple contracts such as appointment of collateral managers, escrow account managers and third party certification agents to verify the quality of shipments. These market trends are opening up the returns that were historically only available to banks and institutional investors are now available to private investors via new fund structures. Transportation risks have traditionally been well-handled through insurance contracts; but political risks including export or import bans, border closures or security disruptions have the potential to lead to re-routing and delays increasing the risk of non-acceptance by buyers and disruptions by collateral, escrow and third party certification service providers. Banks have traditionally focussed on balance sheet financing wherein the general credit of the borrower or the purchaser has been a key input in the financing decision. Trade finance is transaction-based and the stronger the documentation which is now moving online, the easier and quicker will be the financing of the trade transaction. Non-banks clearly have been able to create a niche for themselves in financing of trade transactions including commodity trade which has gradually gone into the hands of private traders and has become riskier due to the absence of government guarantees or state-backed letters of credit. Technology definitely has aided processing of such riskier transactions and collateral managers and escrow account managers, too, have played a significant role by breaking down the trade financing risks. Due to this, unsecured credit has become a possibility and traders are now able to borrow

323 more than what their physical collateral permits. Yet, the need for regulation, even though,  
324 different from jurisdiction to jurisdiction in some cases, remains as large contracts pose  
325 systemic risk to the economy and small businesses deserve to be protected just like small  
326 depositors who get the needed protection. This regulation includes new laws on data security  
327 and ethical conduct by technological service providers as well as changing accounting  
328 standards meant to give advance information to investors and other users of financial reports.  
329 Trade financiers will have to take into account the constantly changing context of trade  
330 finance to continue to experience growth in this area.

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