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Policy Briefing
UKRAINE

Banking Sector Monitor Ukraine

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Structure

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2. Number of banks
3. Market shares
4. Concentration
5. Liquidity
6. Loan growth
7. Non-performing loans (NPLs)
8. Deposit growth
9. Debt
10. Capital adequacy ratio
11. Profitability
12. Interest rates
13. Government bonds

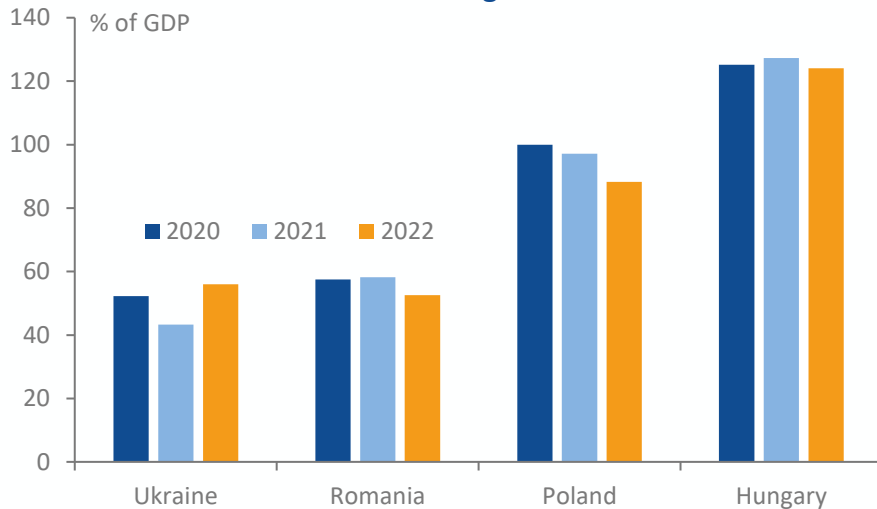
Selected issues

14. Digital transformation
15. Loan subsidy programme '5-7-9'
16. Monetary policy regime change and capital controls
17. Banking supervision measures
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Annex: Banking Sector Statistics

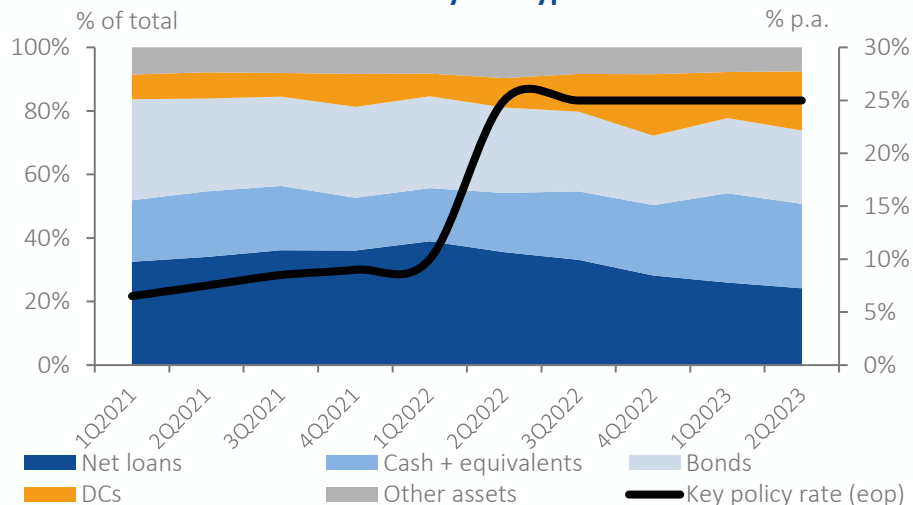
1. Bank assets

Bank assets in a regional context



Sources: respective national banks, Romania is 2Q2022

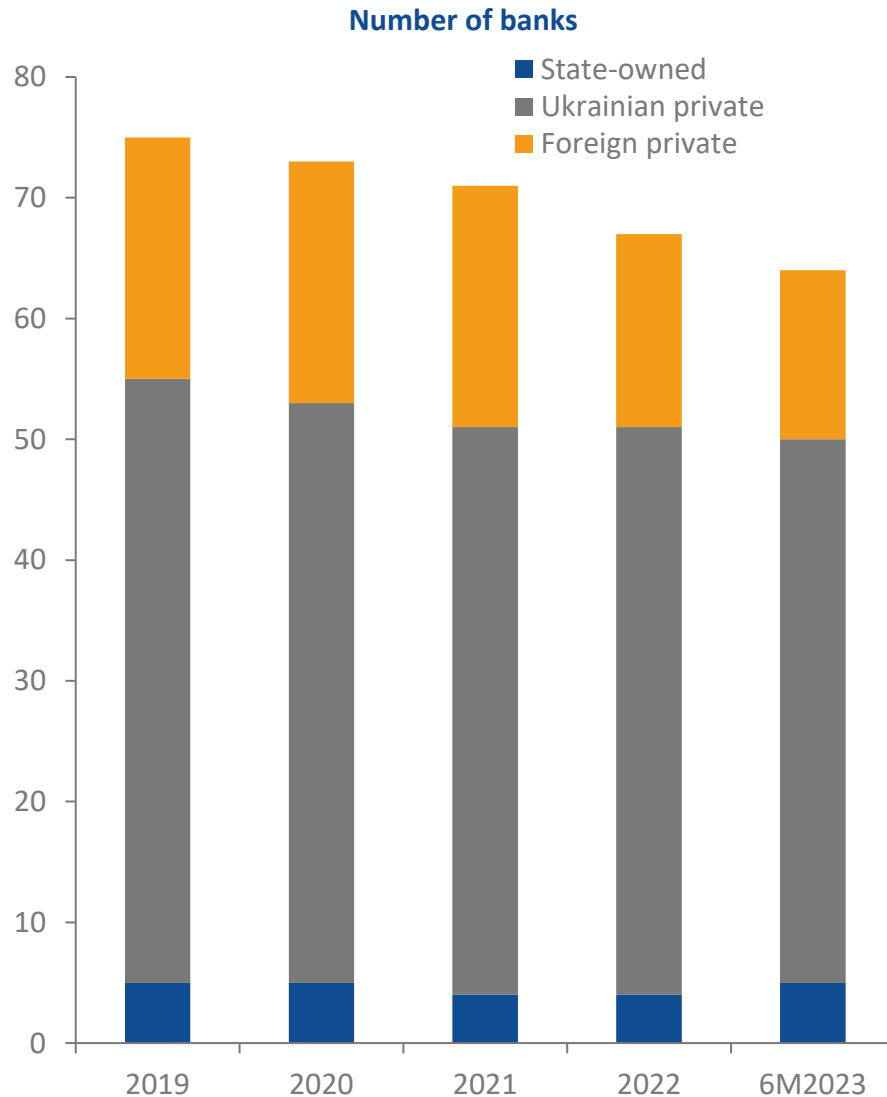
Assets by risk type



Source NBU

- » Ukraine' bank assets as % of GDP are rather low, meaning a low level of financial integration
- » Bank assets to GDP ratio is on a similar level as in ROM but only half of POL or HUN
- » In 2022, bank assets have slightly increased, while GDP has fallen → growing ratio
- » In real terms (in UAH) bank assets have fallen: ca. 13% below Jan-21 level
- » Loan supply declined, while cash and certificates of deposits (CDs) demand increased - banks prefer less risky assets
- » The banking sector continues to play a rather small role in Ukraine's economy

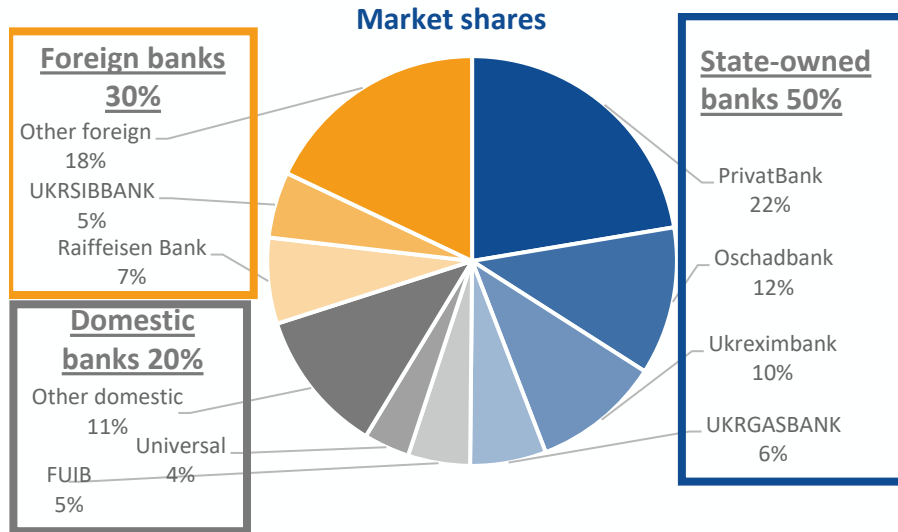
2. Number of banks



Source: NBU

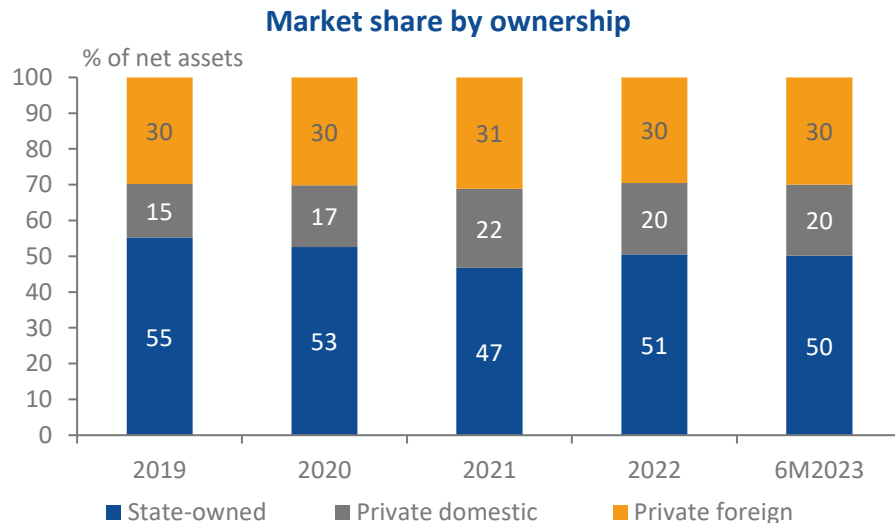
- » The number of banks has declined by 7 since 2021
- » Recently: liquidation of non-systemic CONCORD bank
- » SENSE, a systemically important bank (previously Alfa) was nationalised as main shareholder listed under sanctions
- » Currently, 1/5 of banks are considered to be systemically important → they undergo quality review and stress-tests
- » While these procedures have been postponed since the full-scale war, it is to be expected that the asset quality review (AQR) will be published by Mar-24 according to the IMF EFF
- **Systemically important banks require focused supervision**
- **AQR and stress-test to become vital**

3. Market shares



Source: NBU, net assets, 6M2023, SENSE nationalisation not yet visible in the data

- » State-owned banks (SOBs) dominate with 50% of net assets, even before nationalisation of SENSE is visible in the data only since Jul-23
- » Market leader is Privatbank with 22% of net assets, while the second largest bank accounts for only 12%
- » Ukrainian private banks play less significant role than foreign private ones after 2014/2015

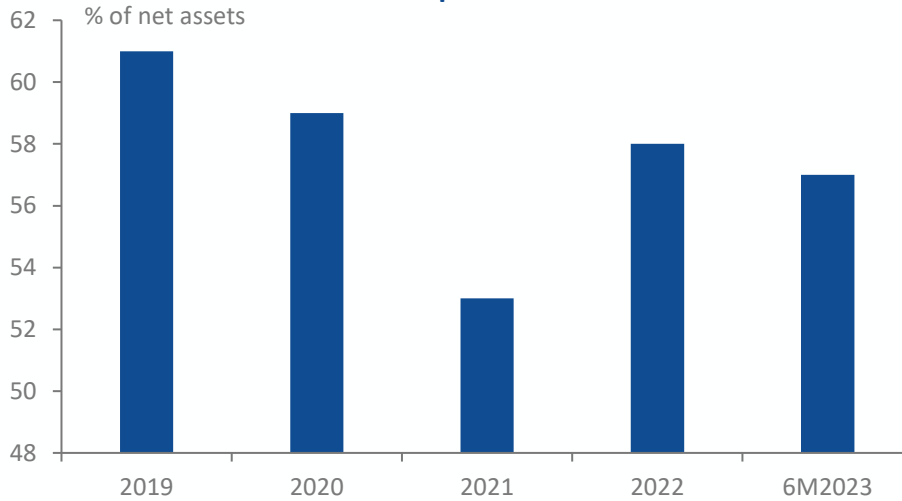


Source: NBU, net assets

- » On the one hand, quite fragmented sector
- » On the other hand, competition is restricted as sector is dominated by state-owned banks

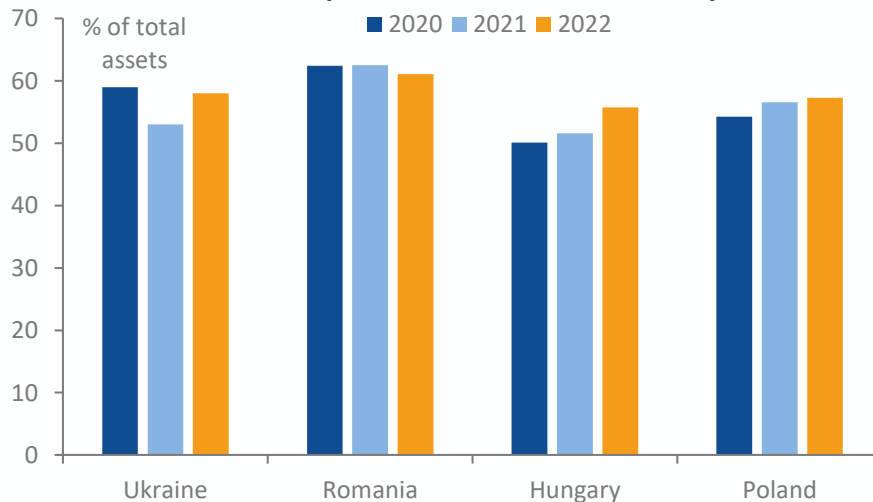
4. Concentration

Asset share of Top-5 banks over time



Source: NBU

Asset share of Top-5 banks: international comparison

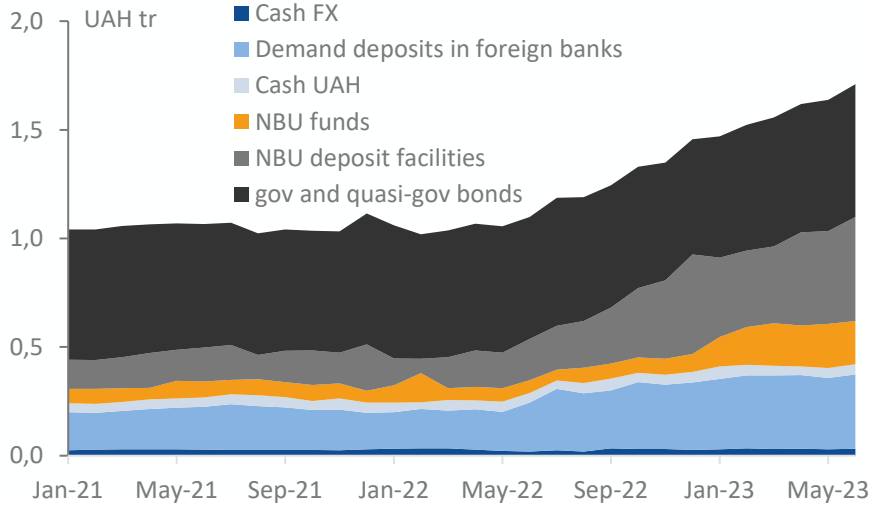


Sources: NBU, ECB

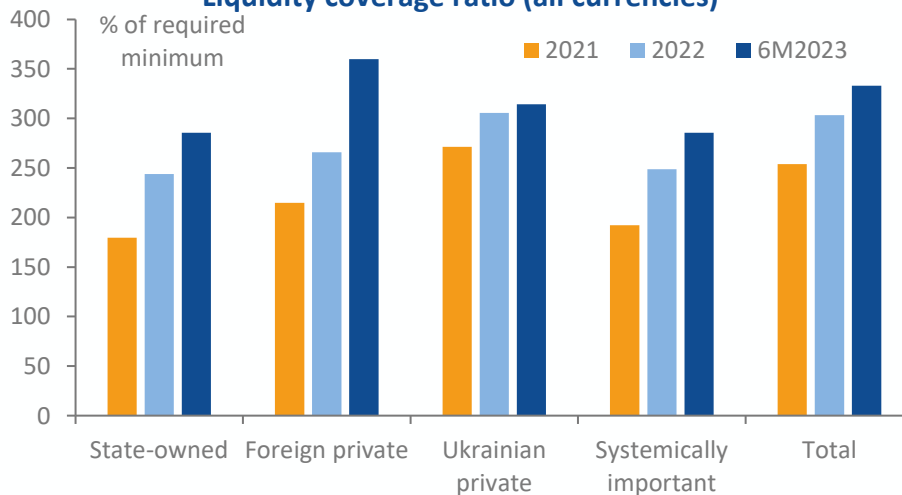
- » Concentration of Top-5 has increased in 2022 compared to pre-war period, but slightly fell during 6M2023
- » However, 4 of top-5 banks are state-owned → 50% of net assets owned by one owner
- » Concentration is on a similar level to EU neighbours
- » However, the share of state-owned banks is much lower in these countries
- Share of Top-5 banks shows a rather fragmented sector
- However, high share of SOBs is a sign of concentration

5. Liquidity

Broad liquidity

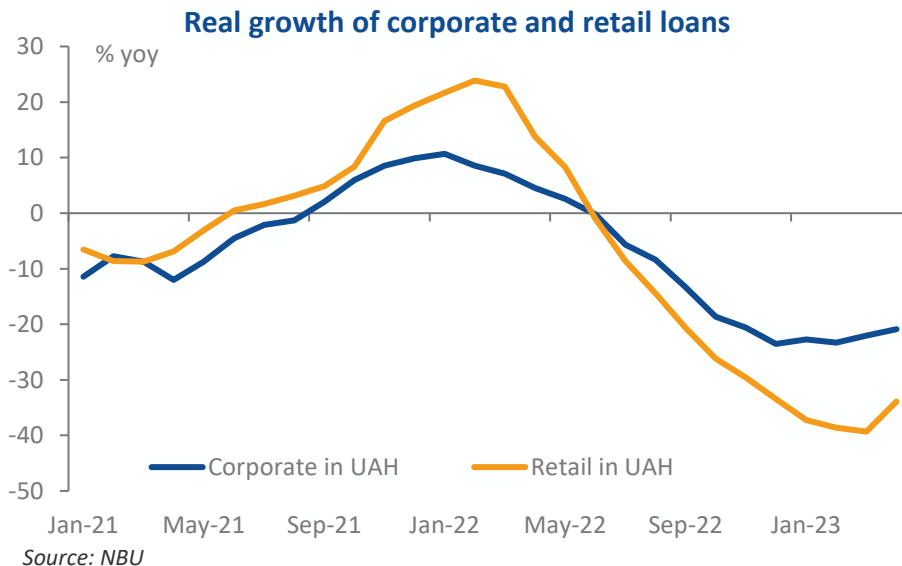
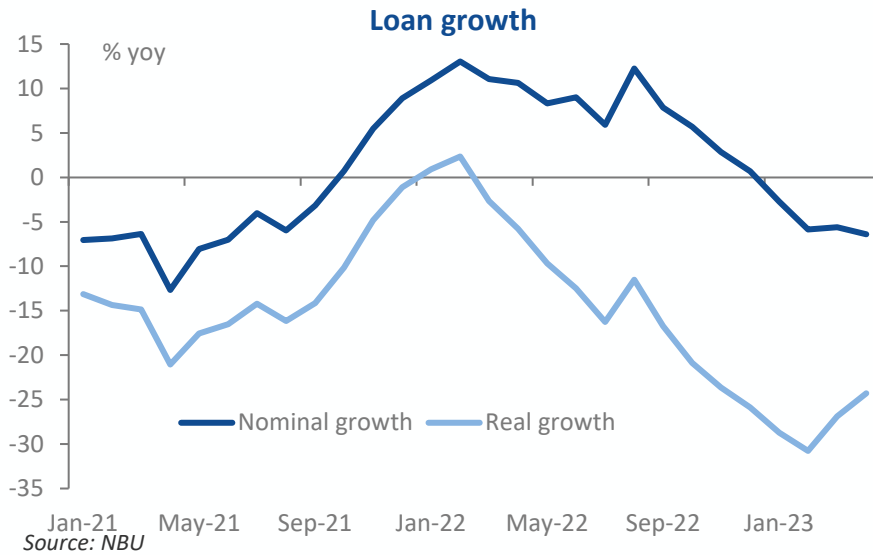


Liquidity coverage ratio (all currencies)



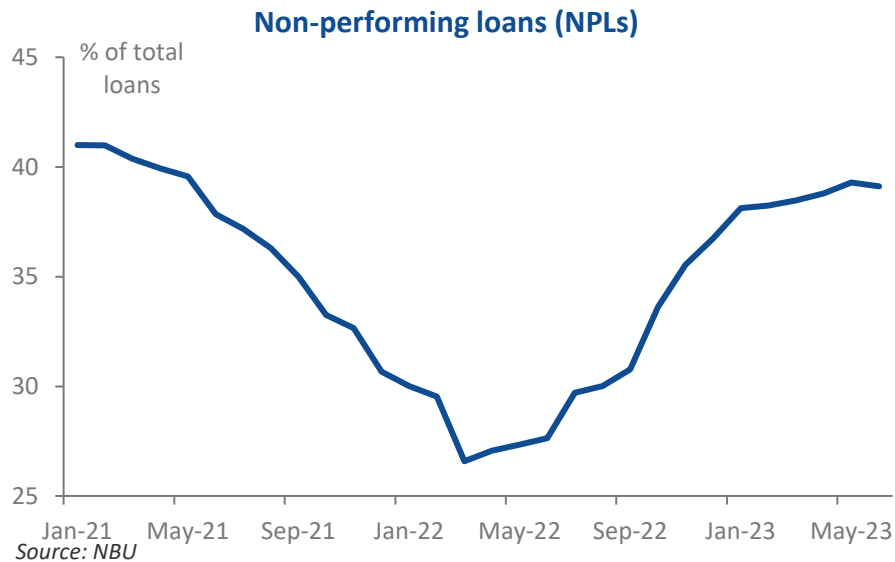
- » The mandatory reserve requirement was hiked strongly since 1Q2023: Jun-23: 5.4 times pre-war level
- » Banks are forced to set aside 10% to 20% of deposits (depending on type) into NBU funds and are allowed to cover 50% of reserves with state securities carrying market-based yields
- » Nevertheless, LCR has grown strongly: to more than 330% of required minimum
- » Growth of deposit certificates due to salaries of military personnel with safe interest rates
- » For banks, this policy is less risky than lending
- » This buffer allows banks to repay debt and relaxes need for additional funding at times when access is restricted
- » On the other hand, excess liquidity reveals lack of market-based lending to the private sector → problem for reconstruction

6. Loan growth

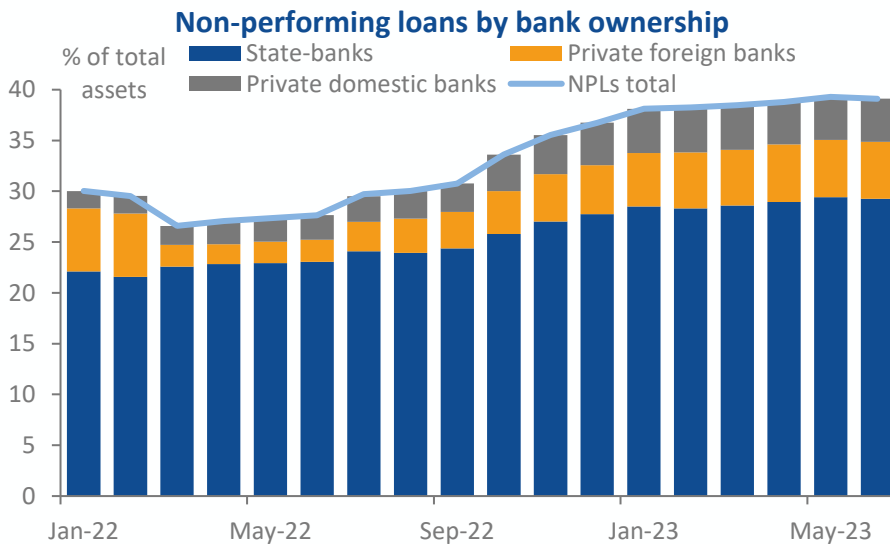


- » Dynamics of loan growth is a good tracker of the overall economic situation
- » Lending to the economy has strongly fallen since the full-scale war
- » This decline would have been much higher without the state subsidy programme '5-7-9'
- » UAH retail loans declined even further as they are not covered by the programme
 - Demand side: households restrain from borrowing due to real wage declines → private consumption fall
 - Supply side: banks charge high risk premia
- **Real loan growth deep in negative space**

7. Non-performing loans



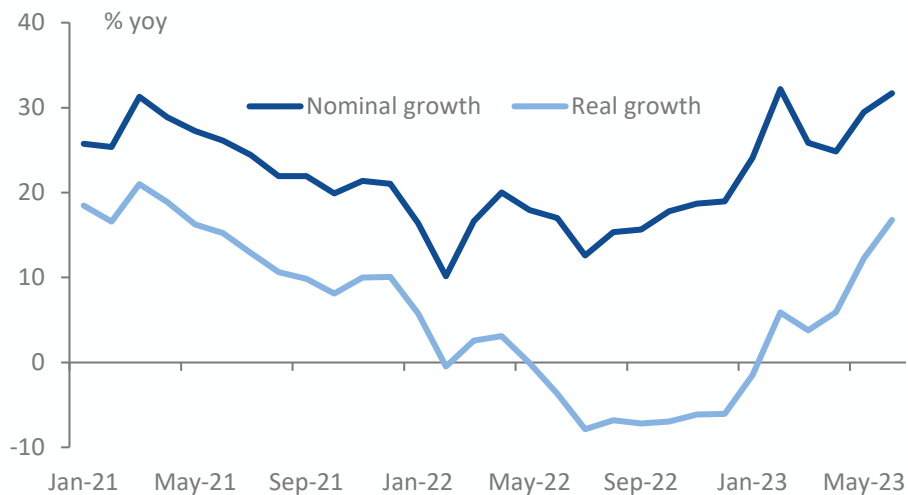
- » NPLs keep rising, but remain below Jan-21 level
- » The rise is driven by state banks and Ukrainian private domestic banks
- » Ca. 14% of corporate loans that were performing at the beginning of the full-scale war now turned into NPLs
- » But asset quality review and stress-test will reveal likely hidden risks of NPLs in the sector



- » Current statistics show a manageable increase of NPLs
- » Comprehensive AQR and stress-tests are essential to understand hidden risks

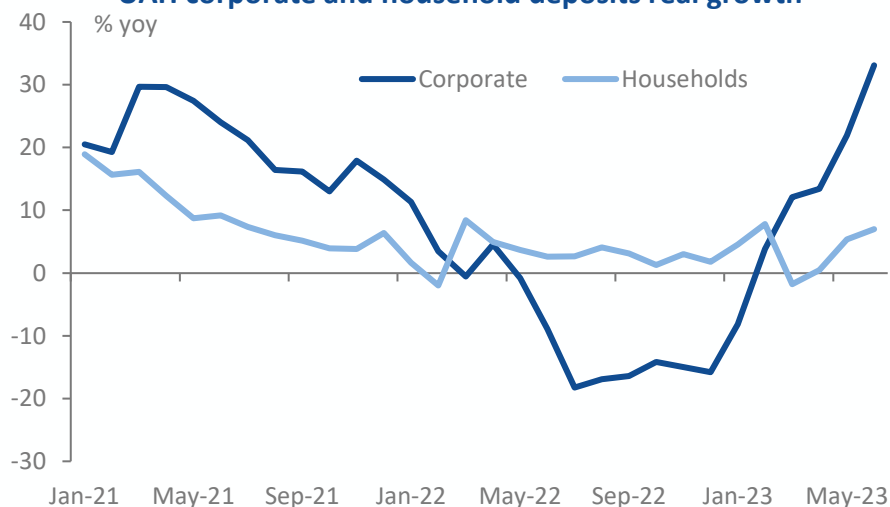
8. Deposit growth

Deposit growth



Source: NBU

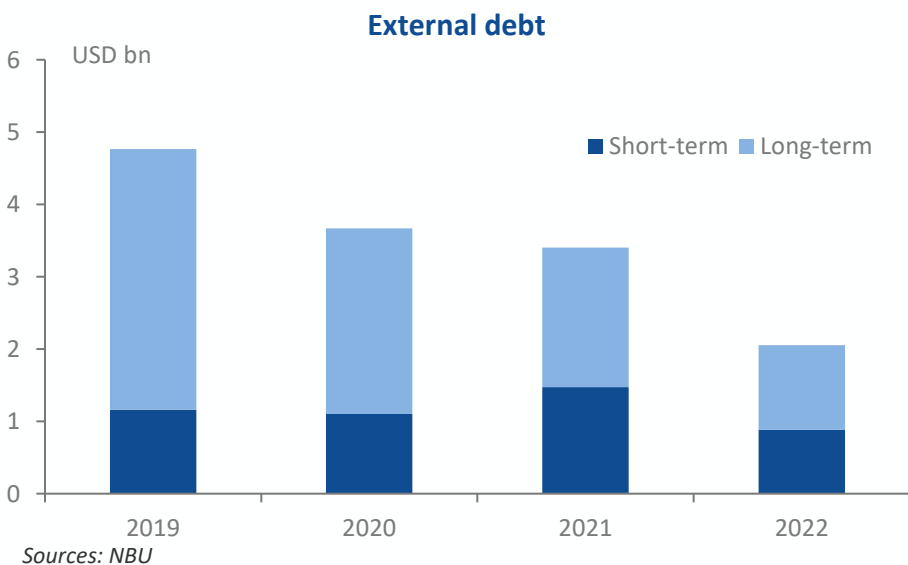
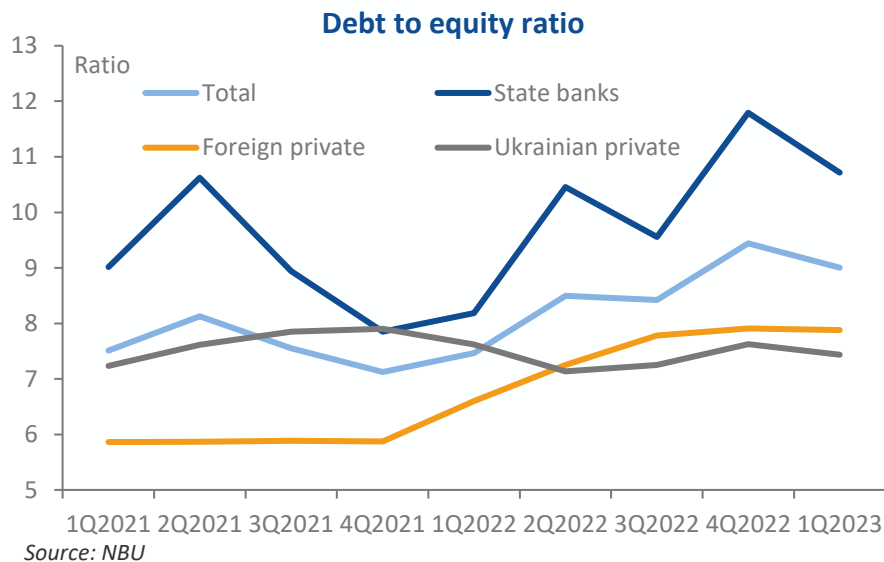
UAH corporate and household deposits real growth



Source: NBU

- » No bank-runs occurred
- » Deposit growth was on a declining path
- » However, it started to recover since the policy rate hike in Jun-23, now turned to positive growth, even in real terms
- » Savings of households and corporates grow in real terms: depressed private consumption and corporates' investment as well as increased demand for deposit certificates
- » Growth of deposits was main reason for the NBU to tighten reserve requirements:
 - Converting highly liquid assets into NBU funds
 - Using domestic gov bonds with market-based yields
- **Recovery of deposits is a sign of stability and public confidence in the sector**

9. Debt and external debt



- » Debt has increased while equity not since Feb-22
- » Debt to equity ratio increased esp. in SOBs and foreign private banks
- » External debt has fallen, however
 - Banks have got only limited access to external financing since beginning of the full-scale war
 - Particularly, SOBs are subject to high-risk country rating, limiting access
 - Excess liquidity supported banks in repaying external debt
- Debt to equity ratio increased
- But external debt declined due to limited access to new external financing

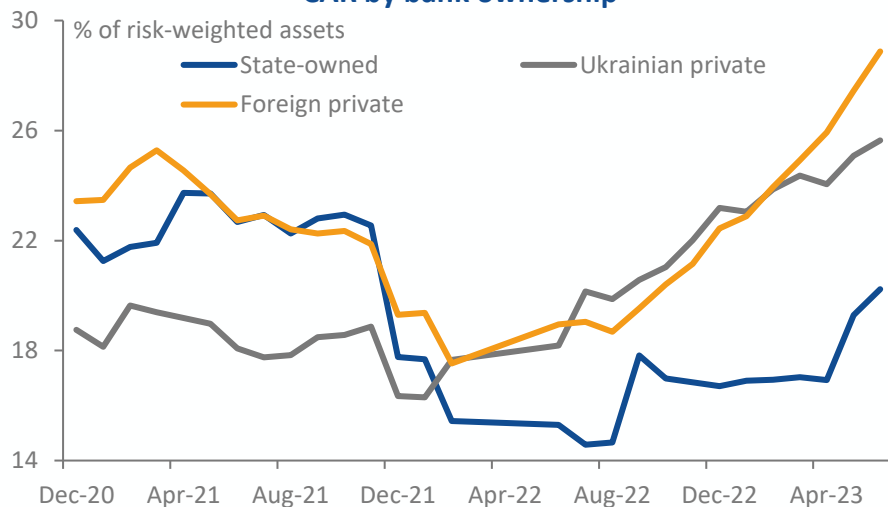
10. Capital adequacy ratio

Capital adequacy ratio (CAR)



Source: NBU

CAR by bank ownership

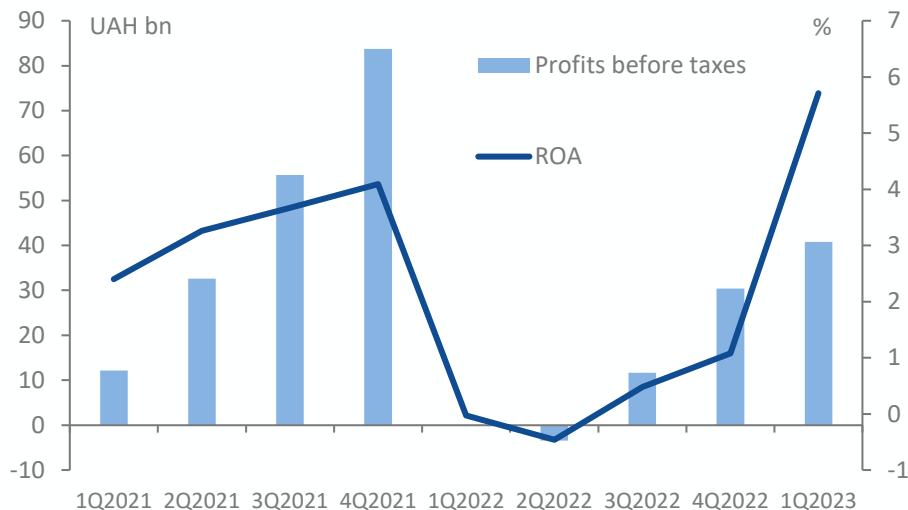


Source: NBU

- » CAR recovered after a moderate decline in first two quarters 2022
- » Despite being on a lower level than pre-war, the ratio remains even higher than in the POL or HUN
- » Sector's profitability stemming from interest income (CDs) maintains the resilience buffer
- CAR reveals a strong resilience buffer
- NBU's supervision policy plays a key role in the development of the resilience

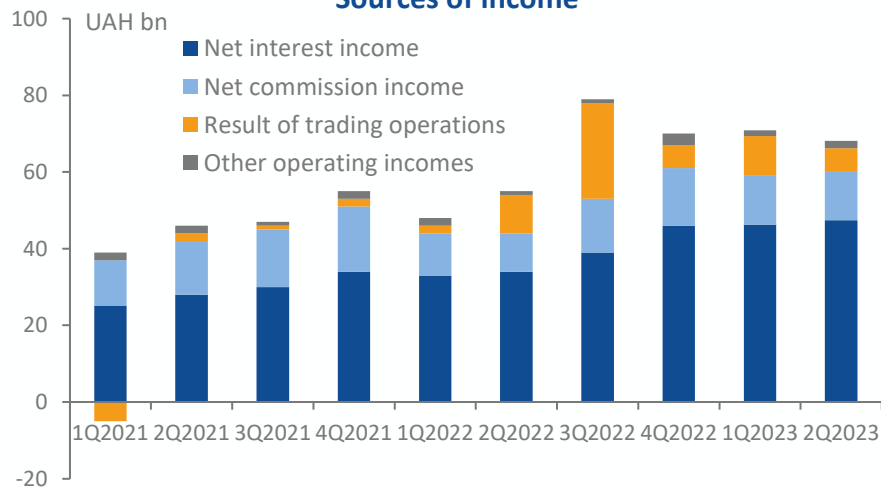
11. Profitability

Banking sector profits and return on assets



Source: NBU, profits before taxation

Sources of income

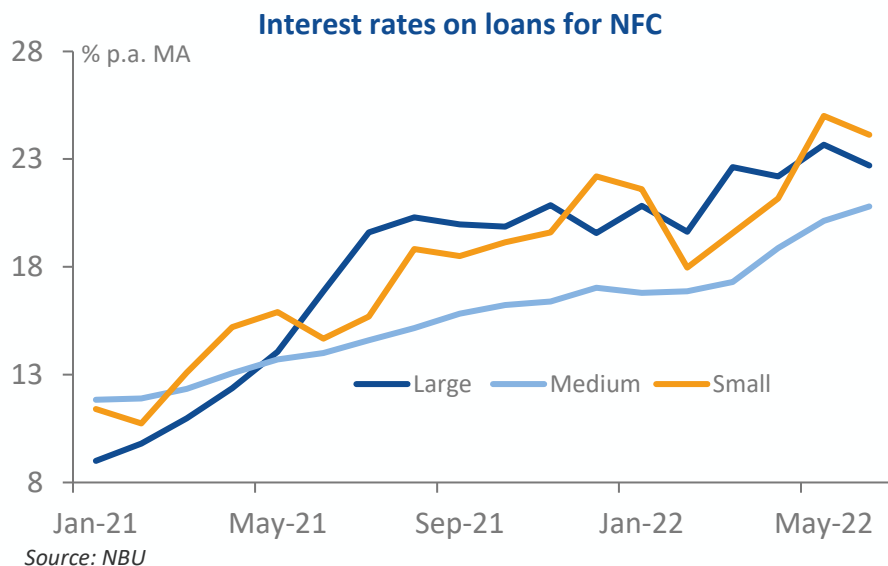
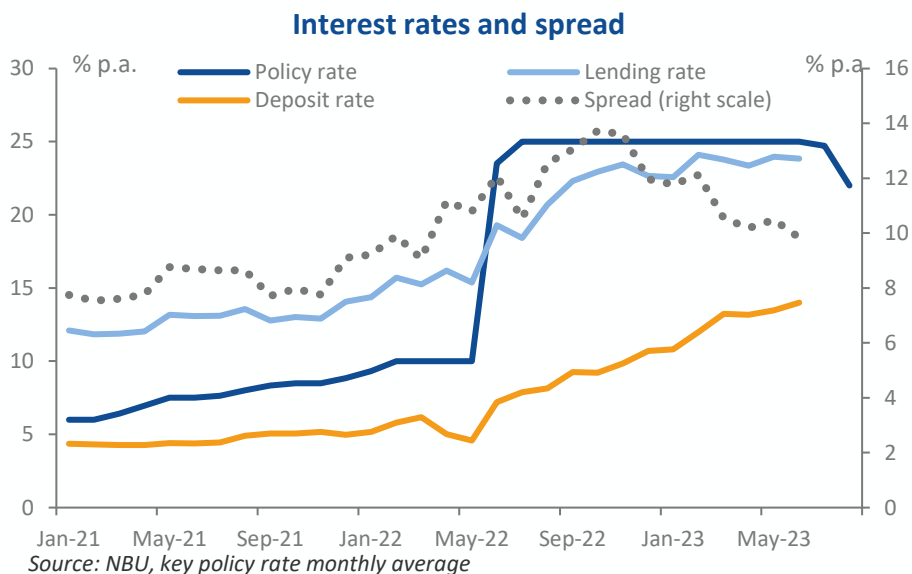


Source: NBU

- » Positive profits despite the war, but lower than in 2021
- » Return on assets has recovered after being close to zero in 1H2022
- » Profitability driven by net interest income, particularly generated from deposit certificates, state bonds and margins from '5-7-9'
- » Trading operations play only a minor role

- Sector remains profitable and gains space to further increase resilience
- But: profitability is driven by state subsidised loans rather than private operations and CDs/state bonds during the war

12. Interest rates

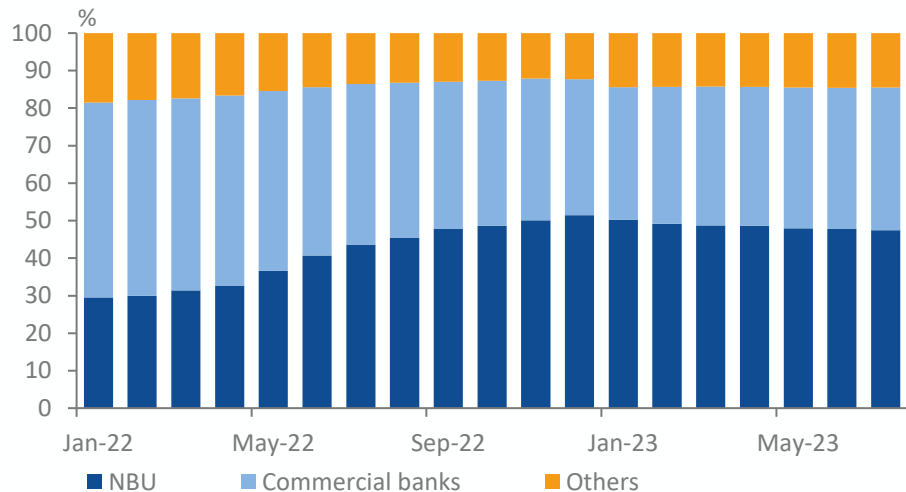


- » Policy rate hiked by 15pp in Jun-23, since then, deposit and lending rates are on a steady growth path
- » Easing cycle with first cut to 22% p.a started in Jul-23
- » Spread has been declining and reached pre-war level in Jun-23
- » Large NFC cannot borrow as part of 5-7-9 programme: rates are not subject to lending rate caps → higher interest rates than for medium-sized companies

- Policy rate easing started
- Further cuts expected for this year key policy rate to fall below 20% p.a.
- Large NFC experience higher interest rates compared to medium-sized → market distortions

13. Government bonds

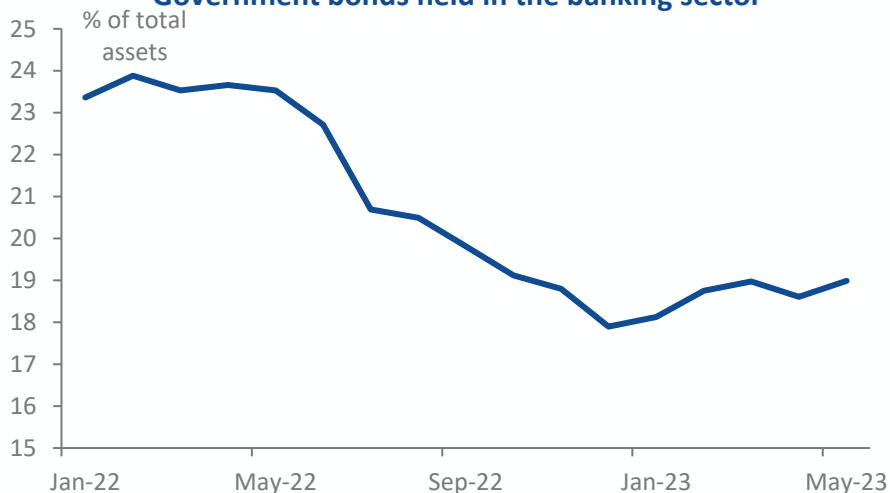
Government bonds in circulation



Source: NBU

- » The NBU increased its share of government bonds from 30% in Feb-22 to 51% in Dec-22
- » The NBU stopped this policy in Jan-23, commercial banks stepped in gradually, they are allowed to cover 50% of reserves with state securities
- » Government bonds are an important source for profits and can be accounted for in the reserve requirements → this increases demand

Government bonds held in the banking sector

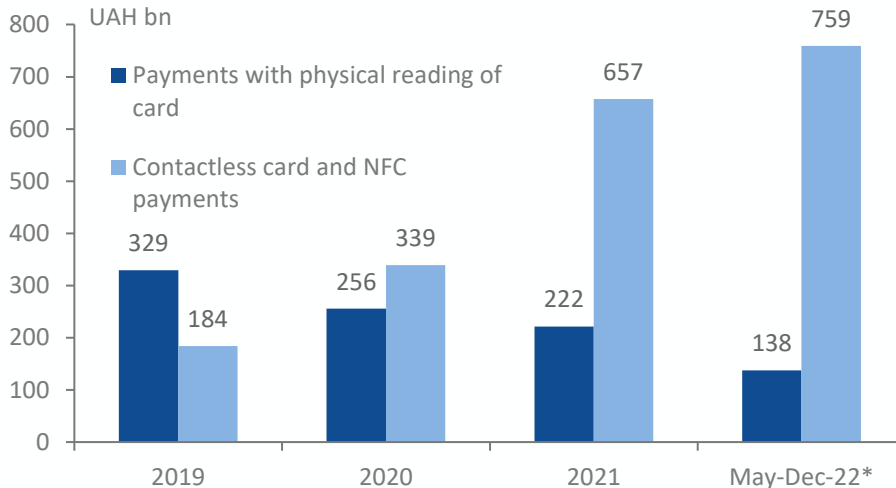


Source: NBU

- » NBU's policy change supports banks' demand

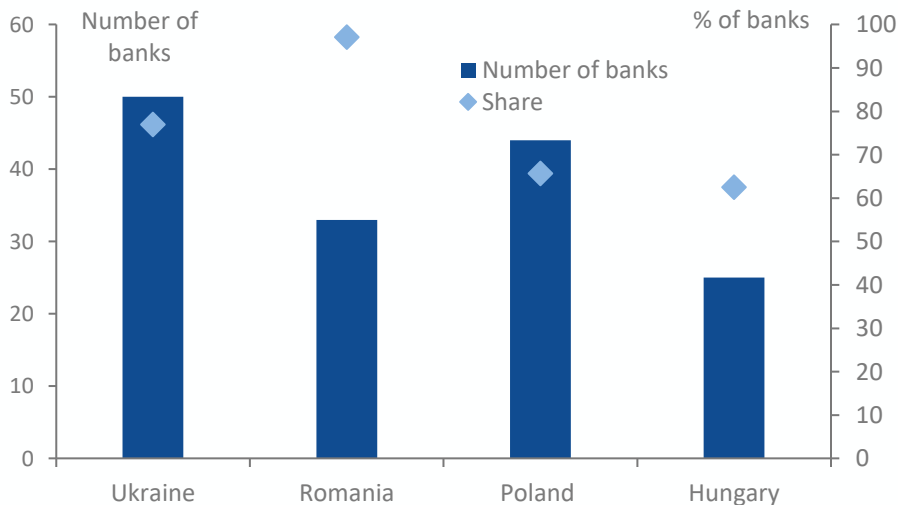
14. Digital transformation

Card and digital transactions in Ukraine



Source: NBU, between Feb-Apr-22, the submission of statistical reporting on transactions with payment cards was suspended.

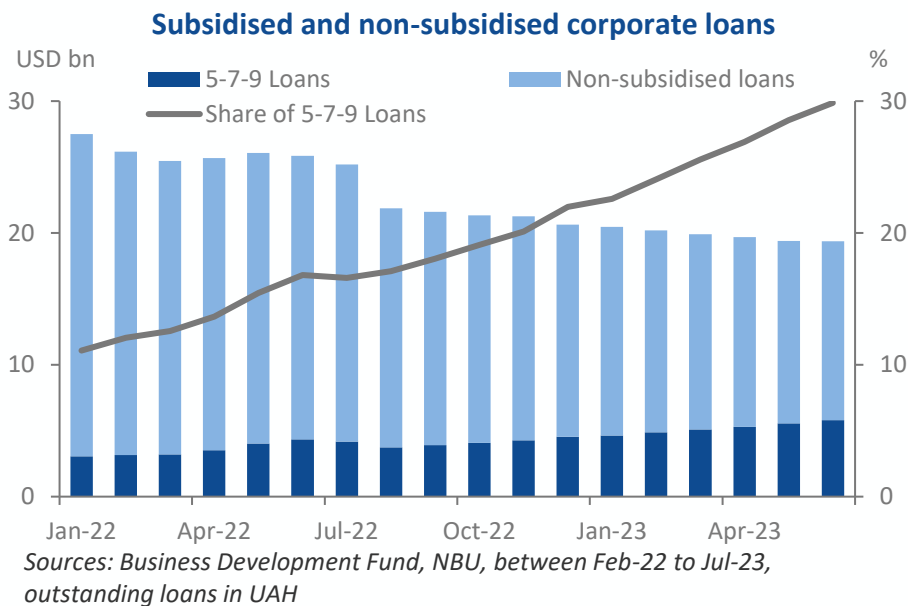
Apple Pay participating banks



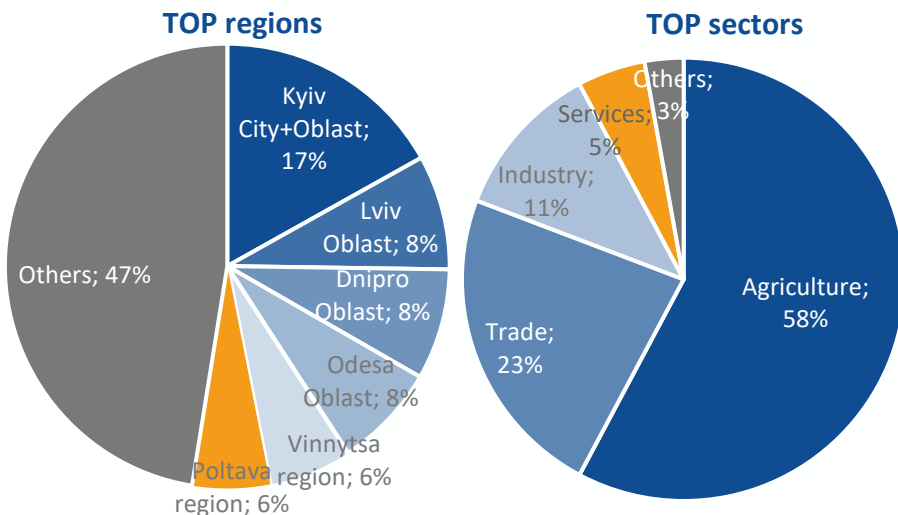
Sources: Apple, respective central banks, European Banking Federation

- » Cashless transactions have become the most important payment method in Ukraine since 2020 (COVID), accounting for 69% of the amount of all card-based transactions in war-affected 2022.
- » Despite Russia's attacks on the energy system in 2022, UKR payments system ran uninterrupted.
- » Payments with contactless cards and NFC increased by 53% in 2022 yoy, accounting for 85% of all cashless transactions (75% in 2021)
- » The availability of Apple Pay technology in UKR is exceeding that in POL, HUN
- Digital transactions are encouraged by UKR government as they improve transparency, lower costs and increase sector productivity, all crucial in wartimes

15. Loan subsidy programme '5-7-9'



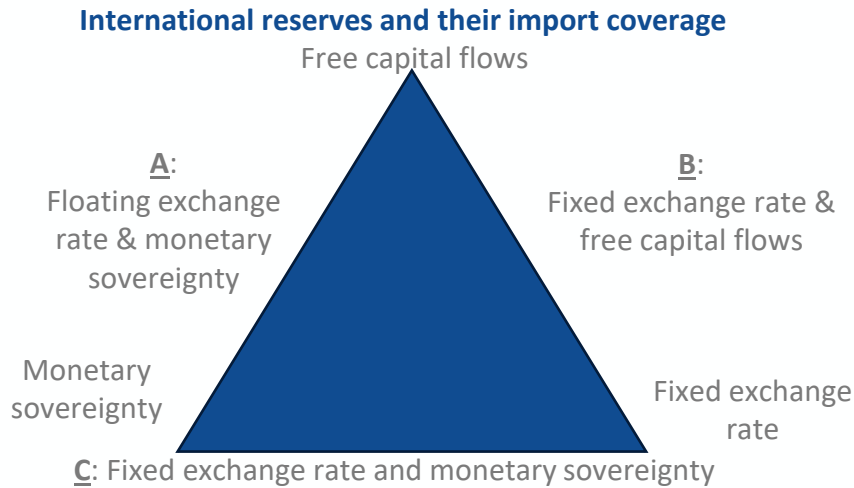
- » High risk premia and increased lending rates are the main reasons behind a decline in market-based loan volume.
- » 5-7-9 program aims to maintain loan access, volume: USD 3.5 bn since 24-Feb-22, currently constitutes 30% of all business loans.
- » Main sectors: share of top sector agriculture (58%) further increased
Regions: Kyiv city + region (17%),
- » However, high policy rates increased fiscal burden, though subsidy capped at 3-month UIRD + margin (currently ca. 10-25% p.a): Fiscal costs at ca. UAH 10 bn (USD 0.3 bn) after 6M2023



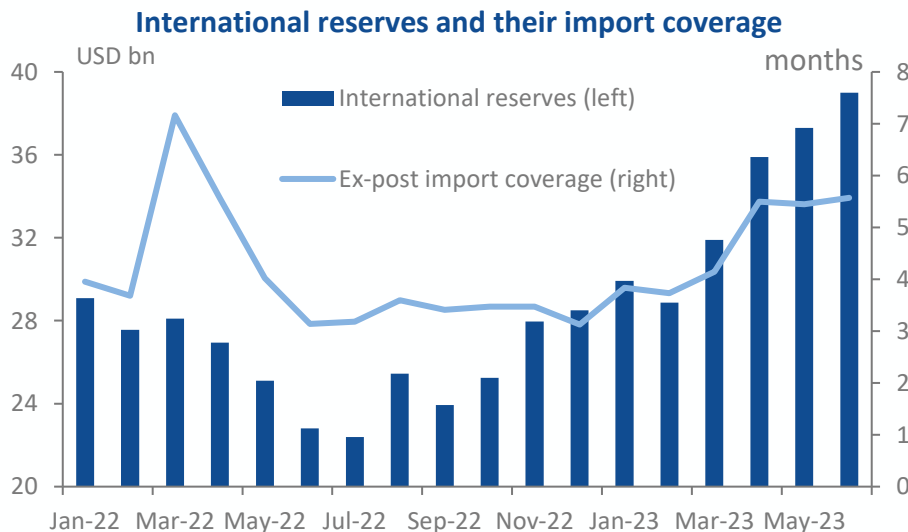
Sources: Business Development Fund, NBU, between Feb-22 to Jul-23

- State support maintains access to loans
- Banks foresee the hryvnia portfolio growth to be primarily driven by state programs: threat of crowding out
- Managing fiscal burden is essential

16. Monetary policy regime change and capital controls



Sources: Obstfeld et al. (2005), [Link](#), Shambaugh and Klein (2013), [Link](#).

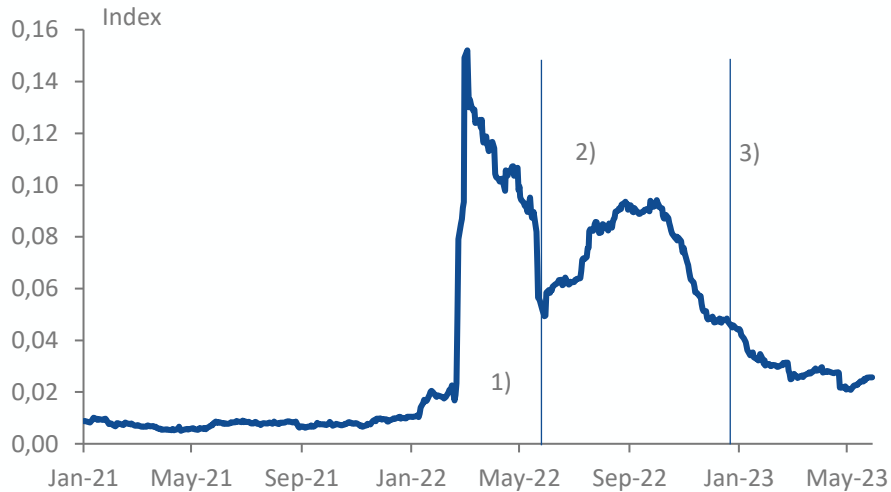


Source: NBU

- » Ukraine had to prioritise monetary budget financing over inflation stability and set exchange rate as main anchor: move A to C
- » New regime was successful in calming down markets: reserves reached all-time high, disinflation continues, spread between cash-market rate and official almost disappeared
- » NBU prepares markets to shift back C to A: capital controls slowly liberalized and new strategy agreed with the IMF announced
- » Though key policy cut recently, further liberalization steps will be followed keeping a tight regime
- » Current macro-financial situation shows a window of opportunity to return to A and inflation targeting (IT)
- » BUT only possible if inflation expectations are firmly anchored for the purposes of monetary policy, e.g. no sudden jump in capped energy tariffs

17. Banking supervision measures

Financial stress index: Bank subindex



Source: NBU

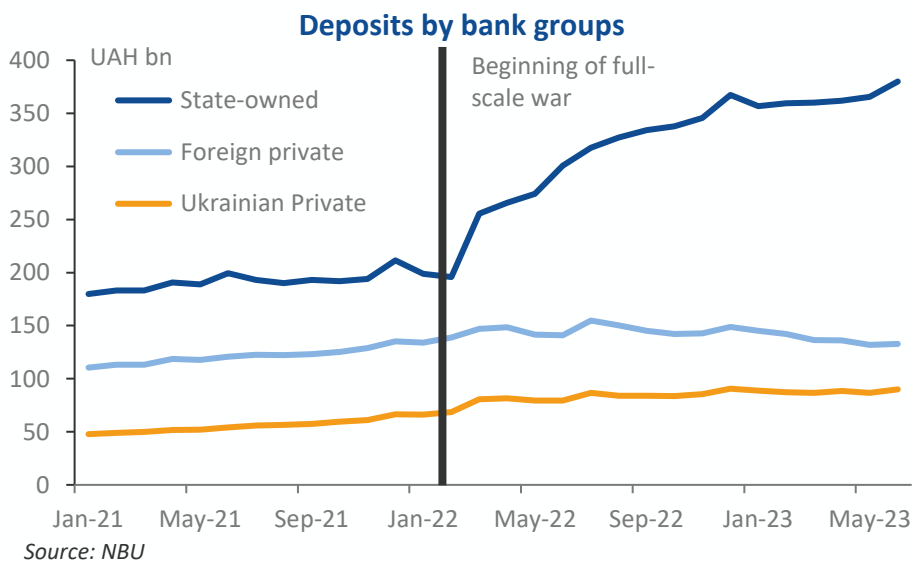
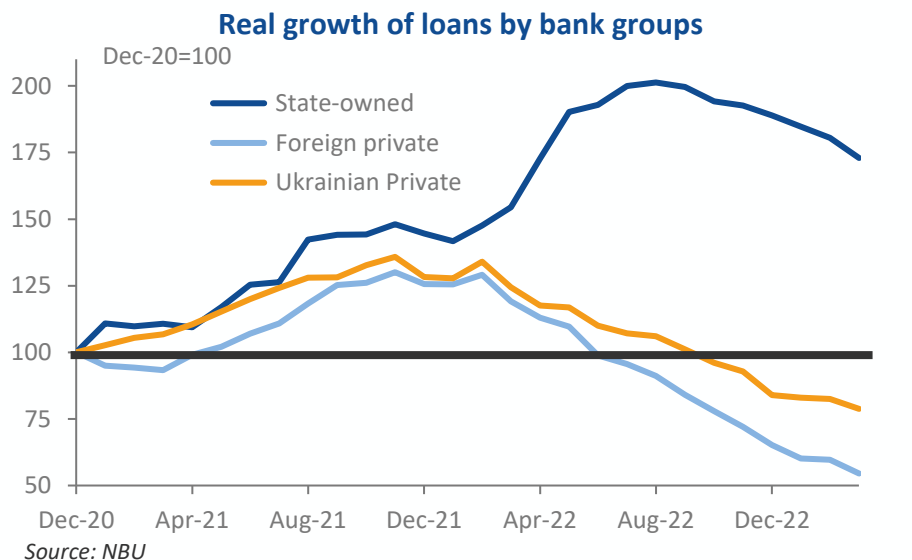
Regulatory measures

Period	Measures
1) Emergency	<ul style="list-style-type: none"> • Unsecured refinancing loans launched • Dividends payout forbidden • Suspended AQR, stress-test, actions for violating CAR, LCR etc. • Loan rate increase were forbidden for customers • Key policy rate (KPR) decisions suspended, exchange rate fixed at pre-war, capital controls
2) Adjustment	<ul style="list-style-type: none"> • UAH/USD depreciated, policy rate hike • Cancel additional fees for ATM withdrawals • Simplified cash withdrawal, currency exchange, money transfer at cash desks
3) Recovery	<ul style="list-style-type: none"> • Changes to liquidity requirements • Liberalisation of capital controls + KPR cut • Allowance to cover 50% of reserves with state securities • Resilience assessment announced for 2023 • Nationalisation of SENSE

Source: NBU

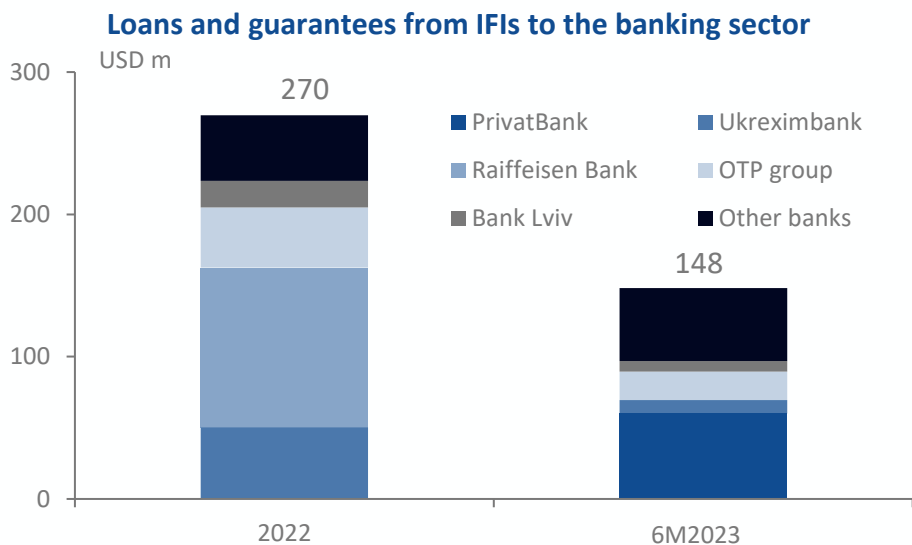
- » Supervision measures were decisive at the beginning of the full-scale war to reduce financial stress
- » Experience from 2014/2015 (max. 0.138), COVID (0.03) and past reforms but stress level was less profound
- » Then, they supported adjustment to the situation and during energy blackouts and now in the period of recovery
- » Measures aim at large availability of liquidity, simplified access to cash for customers and FX stability
- » Recovery of loan growth was not tackled: vital for investment recovery
- Professional response ensures stable banking sector based on key past reforms
- Loan growth resumption is key
- Stress-test and AQR important for 2023

18. Challenges for state-owned banks



- » State ownership plays an extraordinary role during the full-scale war
 - + Rescue of systemically important bank activities (SENSE) during the war
 - + Streamline state priorities during the war (e.g. loans for (re-)construction, agri-food sector, 5-7-9, state-owned companies)
 - Reduce competition
 - Possible political influence
- » SOBs have higher NPLs, debt-to-equity, lower CAR and LCR than private banks in Ukraine, while having increasing share of deposits (63% in Jun-23)
- » Strengthening independent supervisory board vital: stressed in the IMF EFF
- » Roadmap for privatisation after comprehensive AQR in 2024
- The role of SOBs has increased since war
- However, many challenges remain

19. Banks' role in reconstruction



Financial sector development strategy

Initiative	Measures	Responsibility
Development of financial institutions	<ul style="list-style-type: none"> Updated regulation and supervision Improvement of corporate governance Resolving bad asset problems Information disclosure efficiency based on IFRS 	NBU, <i>National Security and Stock Market Commission (NSSMC)</i> , <i>Deposit Guarantee Fund (DGF)</i>
Development of SOBs	<ul style="list-style-type: none"> Reduction of the state's share Ensuring the financial resilience, including by conducting AQRs 	Ministry of Finance (MoF), NBU
Recovery of failed Institutions	<ul style="list-style-type: none"> Implementation of EU laws on rehabilitation and resolution of financial institution 	NBU, DGF, MoF, NSSMC, Ministry of Justice
Guarantee system	<ul style="list-style-type: none"> Implementation of EU laws 	DGF, NSSMC

Source: NBU

- » Worldwide, banks usually play a powerful role in financing the economy and green recovery. However, this is not the case in Ukraine yet:
 - New lending is driven by state subsidies rather than private operations
 - Assets are heavily dominated by risk-free investments (NBU certificates and government bonds) rather than lending
- » There's a lack of international funding support during the war
- » The policies to address these shortcomings might include:
 - Enlarging banks' participation in investment guarantee and export credit insurance schemes, thus reducing risk premia and making loans affordable
 - Promote participation of banks in IFI programmes
- The NBU's financial sector development strategy aims at preparing the sector for its reconstruction role, which is lacking so far

About the German Economic Team

Financed by the Federal Ministry for Economic Affairs and Climate Action, the German Economic Team (GET) advises the governments of Ukraine, Belarus*, Moldova, Kosovo, Armenia, Georgia and Uzbekistan on economic policy matters. Berlin Economics has been commissioned with the implementation of the consultancy.

**Advisory activities in Belarus are currently suspended.*

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