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NEO BANKS, FINTECH, AND BANKING -THE CHANGING LANDSCAPE – A PERSPECTIVE – ON DANGERS, GROWTH, OPPORTUNITIES – A CRITICAL STUDY

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ABSTRACT

The entry and growth of Neo- banks into the financial sector has created disruption in the form of digital lending platforms, new opportunities and risks dimensions of which can accelerate the pace of inclusive growth while at the same time, it is becoming increasingly clear, that the distinction between Neo banks, and fintech's are getting blurred. Heavy investment in digital infrastructure and new products by private banks, may be passes, this becomes another major challenge to be reckoned with. The regulator's role is evolving in situations such as these, with elements of ambiguity for both the regulator and the regulated entities. Self-regulation of fintech entities is also a matter under consideration. The regulatory issues as well as the ill effects/dangers of non-controlled and self-regulated entities are also to be kept in mind. The past literature on Neo banks is examined and the recent report of RBI and Niti Aayog digital bank license proposal discussion paper is also examined. Of particular interest to watch would be the progress made by small economies like Singapore which are using Neo banks to grow their economic strength, and how the regulations are being made more stringent but customer friendly.

The Author goes on to examine how the landscape will get more complicated by the advent of Fintech, who might as well join hands with Neo banks, and its possible implications on the current situation of lending in the Public and Private sector banks. While admittedly it is felt that the decision to include Neo banks will be helpful for financial inclusion –for bottom of the pyramid - it is to be noted that suitable checks and balances need to be present in the system – which can otherwise be subject to misuse by vested interests. How and when we make this transition, in the near future is going to be the key for the Neo banks' growth, our own economic growth and sensitivities in the process. It is going to be a steep gradient over which one needs to negotiate, particularly in regulatory aspect. It is how we negotiate this without any major financial crisis in the background will determine our success or failure in adopting the same. This study proposes to critically examine the risks and opportunities, in the process for Neo banks in the Indian scenario.

Keywords: Neo-Banks, Digital Banks, FinTech's, RBI, Technologies, Regulation, Control Framework, AI.

1. INTRODUCTION

The advent of Digi banks and neo banks as they are called are closely linked to the digital revolution currently taking place in India and also globally. The Pandemic has further accelerated the process to an extent that the change is now inevitable and models will have to be carefully thought out, calibrated and regulations to needs to be flexible, but strigent and capacble of being a deterrent to any players outside who may have malafide interests in entering the muddled waters. Neo banks have grown over the past decade in a big way and it is going to happen more so in the future. The Economy has the potential to absorb the capacity for digital banks which might be quite useful to connect the people at the bottom of pyramid and help to enable a more inclusive financial inclusion in a seamless and dynamic fashion. The RBI has also come out with a paper on digital banks, and plans to give license to select banks.

Each economy had at one time or another been visited by an economic crisis of one type or another. It is also to be noted that the financial landscape today has been highly influenced by technology innovations and become AI driven. With the convergence in tech in the form of ICT, Block Chain, Bit-coin, the risks have gone up considerably. Further innovations in finance along with emerging technologies in Fintech are a new challenge, the outcomes of which are not yet clear to us as of date.

The recent Pandemic has also brought into focus the aspect of innovations and how it is going to aid us in the process of economic revival and growth post the pandemic and it is here that we expect possible advent of Innovtions in financial products and technology may actually accelerate the process of sowing the seeds of future financial crisis unless of course suitable mitigation effects are put in place. These in turn all the more make it imperative for us to focus on effective use and adoption of Innovative technologies for development of the economy in the future, albeit with an focus the possibility of a financial crisis always looming in the background.

The Niti Aayog report has recommended minimum paid up capital a Rs20cr for digital business bank at entry level, while Rs200crs for Full stack digital bank, and is recombing to the MAS (Monetary Authority of Singapore) approach to digital lending. It

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also plans to provide access to the players to i) Aadhar KYC ii) Credit information Companies iii) ATM schemes iv) UPI-NEFT –RTGS v) DICGC against a levy of premium vi) Account

Aggregator eco system. Plans are afoot to offer loans, factoring, Fixed deposits, to MSME, and be technology neutral. Value added services like integrating APIS, payroll, Accounts receivable, payables, and tax compliances etc can be allowed to flow to customers directly.

The RBI has also constituted a working group on digital lending including lending through online platforms and mobile apps, in Nov 2021, which has submitted its report on the aspects of digital banking and how to go about the framework for the same, governed by i) Technology neutrality ii)Principal backed regulation iii) Addressing regulatory Arbitrage , has evaluated the digital lending practices and regulations elsewhere in the global context and arrived at framework which may be suitable to Indian conditions.

The author here examines the past literature in this regard, in regard to the Neo Banks and Fintechs global setup, and the way technology innovations will affect the society and how economy is going to be shaped up by its increasing role. Innovation in financial products, Technology, AI and its effect on the possible creation of new type financial crisis in the future, as well as the sectors that are likely to be affected are also outlined in brief.

Neobank vs. traditional bank

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2. REVIEW OF LITERATURE

Neo banks and their importance has been growing of late and one needs to note that it has become catalyst for growth and economic development can perhaps be done in an effective manner only by recourse to use of technologies, automated computer systems which uses algorithm, Application interfaces, Block chain technology and AI tools and applications extensively. It is here that the distinction between Fintech startups and Neo Banks are getting increasingly blurred. This has wide ramifications across industrial sectors and the general economic conditions, for societal growth. The growth of Neo banks or Digi banks as they are called is going to play a key role in the current decade and make the financial transformation and inclusion closer and integrate the people at bottom of pyramid. With this the landscape for new financial products also are likely to undergo considerable changes and the Regulatory role becomes more discerning and critical, to balance the twin conflict of economic growth v risk of a possible financial scam in the making. The Indian regulator, RBI's experience has been none too pleasant with the past issues involving Yes bank, PCMB, DHFL and the like. So, caution is more required than experiment and adventurism, lest the introduction of Neo banks unwittingly becomes a trigger for another sub-prime crisis in the Indian context. Economists, business captains and Entrepreneurs should understand the various dimensions of these products and use them suitably according to their risk appetite and capital base levels.

Pant,S. K. (2020). Fintech: Emerging Trends. Telecom Business Review, 13(1), has examined the aspect of role of Fintech in leveraging technology to deliver banking and financial solutions to individual and enterprise customers. According to him it is one of the fastest-growing sectors in both developed & developing countries with India amongst the top three fintech start-ups globally. Blockchain, Cryptocurrency, AI, Data Analytics, Machine learning, big data, Robotics, and Cloud are being leveraged by fintech firms to deliver products. The emerging trends include IMF focus on leveraging fintech for cross border payments using distributed ledger technology, Augmented reality for customer satisfaction, Digital insurance, Digital invoicing, Crowd-funding, Crowd investing, Robotics investment advisory, Future relationships between Banks and Fintech firms, Central bank regulatory role, was looked into. Since there is not much research work carried out on fintech in India, they believe there is an opportunity for further research on innovation and growth of fintech in India.

Martinčević, I., Črnjević, S., et al (2020) have in their paper examined the different challenges presenting before the business today,and with the ever changing financial environment has raised the need to design and innovate new financial solutions, which in today's parlance requires use of Bitcon, block chain technology, with no physical locations have become a sort of novelty in providing solutions. They also mention that these technologies continuously change over time, and force the companies to incorporate the same into their business processes and get the maximum value addition and gain over the competition, in the market.

Folwarski, M. (2020), has in his paper see the decrease in trust in traditional financial institutions and digitisation of financial services have primarily been responsible for emergence of new entities like new age fintechs, big techs and neo-banks which affect the revenue share of business of the traditional financial institutions. They mention that new entitites are not covered by the regulation as the banks are and the market regulators do not have instruments to regulate to supervise these entities. The articles attempt to create a set of systemically important Fintechs, Bigtechs, and Neo banks that can affect the stability of the financial eco-system in the economy.

Fritschi, L. N., (2019, May) has mentioned in his paper that the financial crisis of 2008 was triggering the growth of new entrants like Fintech, to improve their services and introduce products, using a new brand of entities called the Neo banks. They looked at the possible disruption of the existing banks, by these new players, using the disruptive innovation theory of Clay Christenson in the context of Swiss banking sector. Their study suggest that Neo banks cannot be considered as disruptive yet and the incumbents are dealing with a sustaining strategy when attempting to internalise technology related to digitalisation.

Corander, B. (2021), have examined the challenges, risks and opportunities the Neobanks entering the banking industry have brought from the societies and customer's point of view. They also look at the risk associated with Neo banks and traditional banks, particularly in the context of cybercrime associated with technology in the banking industry. Using two largest Neo banks, as representative sample in the European market, using the qualitative and quantitative data, plus interview with financial experts, they conclude that Neobanks may have legally questionable practices related to KYC and possible opportunities for money laundering do exist. They conclude by stating that the future business model, market share as well as commercial success of Neo banks are difficult to predict, but it can be anticipated that the banking industry will be impacted by disruptive innovations in the future, arising from opening up of cryto currencies by govts and central banks, plus open banking related regulations in the EU.

Wewege, L., Lee, J., & Thomsett, M. C. (2020) in their paper have examined the various types of services using technology in financial services, provided by 'fintech', that offer various types of services to the traditional banking industry, being more customer centric, fasters, easier, convenient to use free services. They mention that digital-only-neo-banks focus on payment, money transfer,

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loans to small-medium-businesses, and microfinancing, facilitating technological innovation such as digital wallet and messaging peer-to-peer transactions. The perception of Fintech banks is in as a partner for value creation using technologies and innovations to help enable large banks to move to accelerated digital transformation, but are said to lack scale and trust with possible credit and liquidity risk exposures. Their study outcome suggests that digitalised-mobile-banking changes stress on the capabilities of banking infrastructure for data sharing, connectivity, stability and cybersecurity and standardisation of internal and external APIs as progress continues within the regulatory framework.

Branzoli, N., & Supino, I. (2020) have in their paper on empirical research on Fintech credit to households and non-financial corporation, has focussed attention on the factors supporting the development of innovative business models for credit intermediation, such as marketplace lending; the benefits of new credit risk assessment data and methods; the implications of these innovations for access to credit. Their study finds that growth of lenders with innovative business models is mainly driven by the degree of local economic development and of competition in the banking sector. Further new data and methods can improve traditional credit risk models because they assist better in filtering possibly delinquent borrowers, such as those with scant credit history. Finally, they conclude that, FinTech borrowers generally lack (or have limited) access to finance and tend to be riskier than traditional bank borrowers.

Comparative Strength Weakness of Traditional banks – Fintechs – Neo banks

SLno	Tradition banks	Fintechs	Neo banks
	Strengths		
1	Strong connect to existing customers, higher transaction costs	Relatively new –and lower transaction costs	New yet to shape up-lowest transaction costs likely.
2	A permanent and integrated office, infrastructure with office	No major infrastructure with office	No offices needed – all in virtual mode
3	Heavy investment in technology	Lower cost of set up – sharing of technologies and APIs key	Disruptive innovations help to take business away from the other two
4	New product, IOT used in services provided	Capable of introducing new products and services cost efficiency, and timeliness is key	More dependant on technologies uses AI, ML, B-Chain etc and matches efficiencies of Fintechs but at lower costs
	Weakness		
1	Difficulty in catering to bottom of pyramid people	Better placed than traditional banks	Regulation may slow down growth when required
2	Higher capital base requirements	Medium capital required	No such thing – but regulator may stipulate a higher base capital
3	Heavily regulated and subject to audits control,stress testing etc	Somewhat more regulated than Neo banks	May be subject to online audits and regulator intervention frequently
4	Can be threatened by Fintechs and Neo banks and existing customer base may stand eroded or reduced suitably.	Can be more difficult to manage or may need more freedom, to provide a playing field which can get the best out of the model	Fraudulent practices may abound unless suitably monitored under a regulatory framework
5	Can possibly lead to increased NPAs from bigger players	Can handle NPAs better but still may have issues in this	If KYCs and appraisal using tech done properly, lower NPAs are assured

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3. DISCUSSION

The author after having reviewed the above literature review, the current economic and global conditions, believes that given the current dimensions of problems in the world we are in, it is essential for us to accept that Neo banks, are going to play crucial role to sustainable economic growth globally. It is also felt that a sea-change in the financial services landscape particularly with new product offerings can happen, and virtually revolutionise the scope of lending and borrowing. In the services category, it might pave way for introduction of mini- bank guarantees based on some level of KYC, which may kick off a revolution in securitisation and lending at the retail level. At the same, if the credit infrastructure and pooling of good quality debts is facilitated, can give rise to Retail Debt Securitisation, which can be a huge opportunity. However, it is possible that innovations are not without its ill effects, which might as well impact us in ways which can cause a financial crisis, unless properly regulated, and the dimensions of which are more than what we can now imagine. The Neo Banks and Fintechs are increasingly, using APIS, Mobile applications, interfaces with open software technologies, block chain, Bit coin technologies, wireless network, AI, deep learning applications etc which, though beneficial for value added services can possibly destabilise and increase volatility in lending in financial markets, which has the potential to spin out of control, if proper KYC, AML, Cyber risk etc aspects are not suitably factored in.

4. LIMITATIONS OF STUDY

The present paper is an exploratory study on the subject of Neo banks, Fintechs and their role in the growth and development of financial markets, in the context of financial inclusion and connect more to the bottom of pyramid stakeholders in the future. There is no discussion on how the regulatory aspect of fintechs and Neobanks will shape up the future, and more empirical evidence needs to be looked into. While innovation in technology is going to be there in the future, how it may contribute to possibly a future financial crisis, is not dealt with. However, the author's understanding is that the situation is at a nascent stage and it is too early to make any judgement as the technologies and regulations are still in evolutionary stage, and it may take a few more years to see how it all evolves in the financial services sector.

5. CONCLUSION

The Implications arising due to emergence of Neo Banks. and Fintechs is most likely to provide a fillip to the economic development of emerging economies at an accelerated pace, with lower investment in infrastructure, applying reverse cost effective technogy diffusion adaptation approaches, the value proposition they offer, appears to be quite high. These models will also facilitate better capital allocation, risk adjusted return, reduce the threshold for a new financial crisis, the contours of which are most likely to be resident in proper KYC, regulation-based approaches. Increased support and backing of stakeholders and educating them is going to be crucial while at the same time the gaps in timelines arising due to new technologies, time it is available to time being made commercially capable of being exploited will be critical. The author also believes that promoting Neo banks, and Fintechs in the current global order would perhaps pave way for reduced risk levels in the economy, in giving rise to major financial crisis. The too big to fail syndrome may perhaps give way to newer challenges in form of KYC, cyber risks, basic credit appraisal system, related issues, which the regulators and providers will have to find a way to reduce and control. The culmination of financial services, Technology innovations, new application interfaces are likely to change the basic way we look at evaluating loan proposals, customer worthiness and perhaps even credit ratings. A possibly new approach to credit ratings may be called for. The Regulator needs to be watchful and provide level play for the products by participatns while not hestitating to take timely measures to step in or prohibit certain market players from exhibiting unfair practices. An integrated approach is called for and the author believes that certain sectors of the Indian economy, more particularly those related to the bottom of pyramid, retail, unroganised sector, informal sector of economy will be highly benefited from the entry of Neobanks, as is happening by advent of Fintechs.

The Fintechs and Neo banks, along with the growth of startups may perhaps help form a new eco-system which may integrate trust, integrity, entrepreurship and technology innovations more closely, give birth to new players in the financial services domain, help arrive at a suitable framework for deposit and lending in the domestic context, increase the linkage to bottom of pyramid and this might spawn growth opportunities, for small, medium businesses, whose reliance on banks may come down substantially if the eco-system is properly set up.At the same time NPAs from formal banking sector might rise, if lending not regulated properly as they may get into dealing with delinquent large customers. A next growth phase in financial services, with emerging new products in retail lending, placing power in the hands of lower economic stratum of society seems possible. However, care has to be taken to ensure that KYC, and Anti Money laundering provisions be tweaked suitably by regulators so that misuse of new forms of technology innovation in products do not turn to a nightmare for regulator, due to malafide intent on part of some players.

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