**Regulatory interdependence in global finance: the politics of banking regulation in developing countries**

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**Abstract**

International banking standards are intended for the regulation of large, complex, international banks with trillions of dollars in assets and operations across the globe. Yet they are being implemented in countries with nascent financial markets and small banks that have yet to venture into international markets. Why is this? This paper presents the key findings of a 4-year research project that develops a new framework to explain regulatory interdependence between countries in the core and the periphery of the global financial system. Drawing on in-depth analysis of eleven countries across Africa, Asia and Latin America, it shows how financial globalisation generates strong reputational and competitive incentives for developing countries to converge on international standards. It explains why some configurations of domestic politics within developing countries and forms of integration into global finance generate convergence with international standards, while other configurations lead to divergence. The research contributes to our understanding of the ways in which governments and firms in the core of global finance powerfully shape regulatory decisions in the periphery, and the ways that governments and firms from peripheral developing countries manoeuvre within the constraints and opportunities created by financial globalisation.

** Note to readers – this paper is the draft Introduction to an edited volume 'E. Jones (ed.) *The Politics of Banking Regulation in Developing Countries: Risk and Reputation*' forthcoming with OUP. Comments most welcome to emily.jones@bsg.ox.ac.uk. **Please do not circulate or cite**

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## Introduction

On 19 January 2016, three days after economic sanctions were lifted, Iran's central bank governor announced that he would move quickly to implement the latest set of international banking standards. Companies across the world had been lining up to explore opportunities in Iran and the government was keen to attract them, but Iran's banking sector was perceived as a critical weakness. By implementing international regulatory standards, the governor sought to reassure the international community that Iranian banks were soundly regulated, thereby assisting them to reconnect with international lenders and process international transactions (Bozorgmehr, 2016; Financial Tribune, 2017; Saul and Arnold, 2016).

Iran is not alone: many countries around the world are implementing international banking standards. What is puzzling is that in most cases, governments are choosing to regulate a vital part of their economy on basis of international standards over which they had no influence. International banking standards are designed behind closed doors by a select group of regulators from the world's largest financial centres who belong to the Basel Committee on Banking Supervision (hereafter Basel Committee), which takes its name from the small medieval town in Switzerland where the members meet. The standards are intended for the regulation of large, complex, risk-taking international banks with trillions of dollars in assets and operations across the globe. Yet these standards are being implemented by governments across the world, including in many countries with nascent financial markets and small banks that have yet to venture into international markets. Why is this?

In this book we focus on the responses of regulators in low- and lower-middle income countries to the most recent, and most complex, iterations of international banking standards. These countries are the least likely to adopt the standards as their banks tend to be small and focused on the domestic market, and it is far from obvious that the standards are the best way to address the financial stability risks and challenges of financial sector development these countries face. Yet regulators in many of these countries moving to implement the standards. What is going on?

Drawing on a wealth of primary evidence from eleven countries in Africa, Asia and Latin America, we show how regulator's decisions over whether to adopt international standards are made not only in light of technocratic concerns about what regulation is optimal for the banks they oversee, but also by political considerations. As in advanced economies, banking regulation is very important and intensely political. It is important because badly regulated banks increase the risk of financial crises, which are costly for firms, workers and taxpayers. It is intensely political because how banks are regulated determines how credit is allocated in the economy, and this in turn affects which groups in society get to derive value from processes of economic growth.

What is striking about the politics of banking regulation in low- and lower-middle income countries is that international considerations loom large. Strong incentives to *converge* on international standards stem from large banks and regulators in these countries looking to bolster their reputation in the eyes of international investors and regulators in other jurisdictions; the flow of ideas from international policy circles; and politicians and banks on a quest for international capital and integration into global finance. Our first contribution then, is to show the precise ways in which the decisions of regulators based in Washington DC, London, Beijing and the capitals of other major financial centres, decisively shape the decisions of regulators based in Accra, Hanoi, Ouagadougou, and other developing countries in the periphery of the global financial system.

Yet recognising the powerful impact of international factors does not mean we can simply dismiss regulators in peripheral developing countries as standard-takers, compelled by pressures from other governments, international organisations and incentives generated by markets to implement the standards set by regulators from the world's most powerful countries (Drezner, 2008). Integration into global finance does expose peripheral developing countries to external pressures that constrain regulatory choices, but it also provides new opportunities for some domestic actors.

Our second contribution is to show that there is tremendous variation in the responses of regulators in peripheral developing countries to international standards, and to account for it. Very few regulators in peripheral developing countries have adopted these international standards *tout court*. Instead we see a striking degree of variation in the ways their regulators are responding. Some regulators are ambitious in their adoption of international standards, keeping abreast with developments in the Basel Committee and adopting the major elements of international standards as they are issued. Other regulators are more cautious, taking a slower and highly selective approach, and only adopting some elements. Some eschew the latest standards entirely, sticking with regulations based on the much simpler standards issued by the Basel Committee in the 1980s.

We can only explain cross-country variation in responses if we identify the incentives that regulators in peripheral developing face to *diverge* from international standards. High among these are concerns among politicians about a loss of control over the domestic financial system and the ability to direct credit in the economy; concerns on the part of regulators about the viability and desirability of implementing complex standards; and opposition from small domestic banks. As peripheral developing countries are embedded in the international financial system to different extents and in different ways, and their domestic politics and institutions vary, regulators face different mixes of incentives. Building from the existing literature and our case studies, we develop analytical framework that explains why it is that some configurations of domestic politics and forms of integration into global finance generate processes of convergence with international standards, while other configurations create processes of divergence.

While we focus on banking regulation, our findings speak to other scholarship exploring the ways in which decisions made by governments and firms in the core of the global economy powerfully shape, although do not determine, decisions made by their counterparts in the periphery (e.g. Phillips, 2017). More broadly, our work contributes to scholarship that seeks to understand the global economy from the vantage point of actors in the periphery, rather than the centre, which yields fresh insights into how the global economy functions as a system. Scholars of international political economy are increasingly researching the ways in which large emerging economies like China, Brazil and Mexico interface with the global economy. Yet scant attention is paid to smaller countries, particularly small developing countries and the ways in which actors in these countries navigate the global economy (Acharya, 2014). As a result, we fail to analyse and understand the ways in which the global economy and the processes by which it is governed shape, and are shaped by, the majority of the world's governments, citizens, and firms.

## Core-periphery dynamics in global finance

Following a dramatic increase in the globalization of markets for goods, services, capital and information since the 1980s, national economies are more integrated than ever, generating an unprecedented level of economic interdependence.[1] Within this interdependent system, economic wealth and power is heavily concentrated in relatively few countries. As at 2017, the largest four countries (US, China, Japan and Germany) accounted for half of the world's total economic output, while the largest twenty countries accounted for more than four-fifths.[2] With the fragmentation of

[1] The slow-down in cross-border flows of trade and finance after 2008 led some to speculate that globalization is in retreat, but dramatic increases in cross-border data and information flows, suggest that it has simply entered a new digital phase (Lund et al., 2017).

[2] Author's calculations based on World Bank data for 200 countries. GDP and population data averaged over 2015-2017. Data available at: https://databank.worldbank.org

production processes, economic power is increasingly concentrated at the firm level too. The vast majority of international trade occurs in global value chains led by transnational corporations and these production systems generate one in five jobs worldwide (UNCTAD, 2013; ILO, 2015). Unsurprisingly, the world's largest firms are overwhelmingly based in the world's largest economies. As at 2013, there were 8,000 companies worldwide with a revenue of more than US$1 billion and half were headquartered in the US, China, Japan and Germany (Dobbs et al., 2013, p. 22). The global economy then is a hierarchical, interdependent system, with a distinct core and periphery, in which economic power is concentrated among relatively few countries and firms.

With attention in academic and policy circles focused on dynamics in countries in the core of the global economy, it is easy to overlook how many governments, firms and citizens are located in countries in the periphery. It is conceptually and empirically challenging to precisely delineate between the core and periphery, as it is dynamic and evolving, as the recent experiences of East Asian countries like South Korea and China powerfully illustrate. These countries that were peripheral to the global economy three decades ago but are now part of the core.

Yet even a cursory glance at the data indicates the magnitude of the periphery: one hundred and eighty countries, home to 2.9 billion people, account for less than one fifth of the world's economy.[3] In more than one hundred countries, governments manage economies that less than one percent of the size of the US economy.[4] While some of these peripheral countries have small populations and high incomes, like Malta and Iceland, the vast majority are low and lower-middle income developing countries, like Nicaragua and Zambia.

Nowhere is this concentration of wealth more pronounced than in international finance. The globalisation of finance has taken a quantum leap since the 1980s, spurred on by the deregulation of banks and liberalisation of cross-border capital flows. Financial flows reached dizzying heights by 2007, with US$12.4 trillion moving between countries on eve of the global financial crisis, equivalent to 23 per cent of global GDP (Lund et al., 2017). Financial assets are heavily concentrated in the US, and to a lesser extent, the UK (Oatley et al., 2013) and, as in other parts of the global economy, and have seen the emergence of very large firms. Some banks are so large, complex and interconnected that twenty-nine of them, including Citigroup and JP Morgan Chase, have been classified by regulators as 'systemically important' on a global level (FSB, 2016). In 2017, the world's ten largest banks had combined assets of more than US$28 trillion, and 37 of the world's largest 100 banks were located in just three countries (China, the US, and Japan) (Mehmood and Chaudhry, 2018).

The flipside of this heavy concentration of global finance in a few countries and firms is that more than one hundred and fifty countries account for less than ten percent of all liquid financial assets around the world.[5] Yet these peripheral countries are integrated into this hierarchical system of global finance to an ever-greater extent, particularly peripheral developing countries. Following waves of privatization and liberalization in the 1980s and 1990s, foreign bank presence increased and by 2007 accounted for more than half of the market share in 63 developing countries (Claessens and van Horen, 2012). In the wake of the global financial crisis, many European and some US banks have retrenched, closing their operations in peripheral countries. However, this has not reduced the amount of foreign bank presence, as the space they left has been filled by banks from China, Canada, and Japan, as well as rapidly-expanding regional banks (Enoch et al., 2015; Lund et al., 2017).

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[3] Ibid.

[4] Ibid.

[5] Author's calculations. Data on liquid liabilities in millions USD (2000 constant) for 178 countries, calculated as a 5-year average 2013-2017 extracted from the World Bank's Global Financial Development Database: http://www.worldbank.org/en/publication/gfdr/data/global-financial-development-database

As a result of these changes, developing countries now have a higher level of foreign bank presence than industrialized countries, making them particularly vulnerable to financial crises and regulatory changes in other jurisdictions. This heightened interconnectedness was powerfully illustrated during the 2007-8 global financial crisis which, unlike previous crises, affected all types of countries around the world (Claessens, 2016). Although there are exceptions and regional differences, few peripheral countries have been left out from this trend of increasing financial integration.

Concentrations of power and wealth in the financial system generates distinct core-periphery dynamics (Bauerle Danzman et al., 2017; Ghosh, 2007). As financial globalisation has intensified, market movements in the financial core ever-increasing effects on financial markets in the periphery (e.g. Aizenman et al., 2015; Akyuz, 2010; Reddy, 2010; Rey, 2015). This was illustrated by the 'taper tantrum' in 2013 as moves by the US Federal Reserve to normalise interest rates led to an outflow of capital from emerging economies. In general, a reduction in demand for capital in the core generates capital inflow bonanzas in the periphery, and banking crises when increased demand in the core leads these flows to reverse (Bauerle Danzman et al., 2017; Rey, 2015).

Similarly, as core countries are home to the world's largest banks and other market actors, regulatory decisions in the core shape the worldwide behaviour of these actors, affecting financial markets in the periphery. For instance, changes in the regulatory and enforcement landscape in core countries has significantly contributed to a reduction of correspondent banking relations, particularly in Europe and Central Asia, the Caribbean, Africa and the Pacific (IMF, 2017).

Low-income countries are positioned particularly precariously in global finance. Increased levels of integrated into the global economy have left low-income countries more exposed and vulnerable to international shocks. However, as they have resource-constrained governments and many economically vulnerable citizens, they have the least resources to cope with them (IMF, 2011).

While dynamics in the core have major impacts on the periphery, dramatic changes in the periphery rarely impact the core. A banking crisis in a country in the core reverberates throughout the system because countries in the core are intimately connected to many other countries and hold many of their financial assets. Conversely, because peripheral countries are connected to only a few other countries and any one peripheral country holds a relatively small proportion of the assets of core countries, a banking crisis in a peripheral country has a limited impact on other countries (Oatley et al., 2013).

## Peripheral countries: excluded from global financial governance

The fortunes of peripheral countries are increasingly shaped by market dynamics and regulatory decisions in the core of the global economy, but peripheral countries are chronically under-represented in many of the international bodies set up to govern the global economy. Again, this is particularly true in global financial governance, and for low- and lower-middle income countries.

In the 1970s, in response to growing financial interdependence and the heightened risk of cross-border financial contagion, central bank governors from the world's largest financial centres came together to form the Basel Committee. They came together to agree minimum regulatory and supervisory standards for internationally active banks. As financial globalisation intensified, other standard-setting bodies were created including for securities (the International Organization of Securities Commissions), insurance (the International Association of Insurance Supervisors) and accounting (the International Accounting Standards Board). At the end of the 1990s, leaders of the G7 countries created the Financial Stability Forum (the forerunner of the Financial Stability Board) to bring these disparate standard-setting bodies together in a bid to improve cooperation and international financial stability.

By design, peripheral developing countries found themselves at the margins of these standard-setting bodies. The remit of these bodies was to promote financial stability in the core of the financial system and membership has been restricted to regulators from the world's largest financial centres. Much of the regulation flowing from the Bank of International Settlements, the Financial Stability Board, the Financial Action Task Force, and other standard-setting bodies is designed to address to regulate the world's largest international banks.

Membership of the Basel Committee was expanded to incorporate ten emerging market economies following the global financial crisis.[6] However, even among Basel members, regulators from emerging and developing countries are less engaged in Basel Committee proceedings. Historical institutionalist scholars would attribute this to relative sequencing (Farrell and Newman, 2010): institutional capacity and regulatory expertise are important sources of power in global regulatory politics (Slaughter, 2004; Baker, 2009; Posner, 2010; Seabrooke and Tsingou, 2009). Since emerging market representatives in the Basel Committee lack such institutional capacity in relative terms, the incumbent network of well-resourced regulators from industrialized countries continues to dominate the regulatory debate (Chey, 2016; Walter, 2016).

The vast majority of developing countries are not members of the Basel Committee, and have minimal input into the standard-setting processes. Although the Basel Committee has a long-standing Basel Consultative Group that is designed to promote dialogue between members and non-members, it is dominated by developed countries, and low and lower-middle income countries are chronically under-represented.

Thus, as Pistor (2013) notes, through the prowess of the financial institutions they house and their control over the key decision-making processes, regulators from the world's largest economies determine the rules of the game when it comes to global finance. Peripheral developing countries remain woefully underrepresented in financial standard-setting (Griffith-Jones and Persaud, 2008; Jones and Knaack, 2019).

## International banking standards: ill-suited for peripheral developing countries?

The under-representation of peripheral developing countries in standard-setting processes generates challenges for the efficacy of international financial standards for these countries. There is consensus in academic and policy circles that in financial regulation 'one size does not fit all'. As a result there is an inevitable divergence between the international standards and the sui generis regulations that would be most appropriate to each jurisdiction's industry structure, pre-existing financial regulation, and political preferences (e.g. Barth, Caprio, & Levine, 2006; The Warwick Commission, 2009). The gap between international standards and the regulations that would be optimal at the national level is greatest for developing countries, particularly low-income developing countries, as the continued dominance of developed countries in decision-making results in standards that are poorly calibrated for their financial sectors and regulatory capacities.

Should banking regulators in countries in peripheral developing countries base their regulations on international standards? The answer is not obvious. An effectively regulated banking sector is of vital importance for peripheral developing countries, and effective regulation has become even more important as integration into global finance has intensified. Banking crises have high costs in terms of lost economic growth, unemployment, and the fiscal costs of bailouts (Amaglobeli et al., 2015). Opening up the financial sector exacerbates the risks of banking crisis and sharpens the need for sound regulation (Reinhart and Rogoff, 2013).

[6] After the global financial crisis regulators from the world's largest developing countries (those belonging to the G20) were invited to join the Financial Stability Board and related committees. The Basel Committee now covers twenty-eight jurisdictions, including regulators from several large developing countries: Argentina, Brazil, China, India, Indonesia, Mexico, and South Africa. The current membership comprises 45 members from 28 jurisdictions, including the G20 countries. See: http://www.bis.org/bcbs/membership.htm

The general argument in support of modelling national regulations on 'international best practices' is that effective regulations are costly to design. Rather than spend precious resources designing their own *sui generis* regulations, resource-constrained governments can save time and effort by adopting the tried and tested practices of regulators in other countries. Yet practices that have been effective in one context will not necessarily be effective when transposed into a different one (Andrews et al., 2013). Financial systems differ greatly even among advanced industrialised countries (e.g. Haber and Calomiris, 2015; Zysman, 1984) and regulations need to be carefully calibrated to reflect local economic and institutional contexts if they are to be effective (Barth et al., 2006; Barth and Caprio, 2018).

The mismatch between international standards and the regulatory needs of peripheral developing countries has grown wider with time, as international standards have become increasingly complex and targeted at reducing specific forms of risk-taking that are most prevalent in large international banks. The first set of international banking standards (Basel I) were agreed by the Basel Committee in 1988 and, along with the accompanying Basel Core Principles, they were relatively simple and straightforward to use. They were widely adopted across the world and are still used by many Basel member countries for the regulation of smaller domestic banks (Hohl et al., 2018).

As international banks grew in size and developed increasingly sophisticated financial products, the Basel Committee responded by with increasingly complex regulatory standards. Basel II (agreed in 2004) and III (agreed in stages between 2010 and 2017) were designed for regulating internationally active banking groups with complex business models that are subject to a variety of risks, including the ones posed by their own operational complexity (Restoy, 2018). Under Basel I, the regulatory capital a bank needed to hold could be calculated "on the back of a small envelope by a competent clerk" but ascertaining the capital requirements for a large bank under Basel II can easily require over 200 million calculations (Haldane 2011: 3-4).

Basel standards have been widely criticised for failing to effectively regulate banks in the core of the global economy, so it is unclear that they are 'best practice' even for regulating large banks in countries with large and complex financial sectors. Critics point out that Basel II espoused a regulatory approach that ceded too much discretion to banks and ultimately contributed to the global financial crisis (e.g. Admati, 2016; Bayoumi, 2017; Haldane, 2013; Lall, 2012; Persaud, 2013; Romano, 2014; Tarullo, 2008; Underhill and Zhang, 2008). Substantial reforms were made following the global financial crisis, embodied in the Basel III standards. While experts agree that Basel III is an improvement on Basel II, the overall level of capital that banks are required to hold remains far too low to ensure stability and banks are still allowed to use complex, potentially flawed, and gameable internal models (e.g. Admati, 2016; Admati and Hellwig, 2014; Haldane, 2013; Hoenig, 2013; Lall, 2012; Romano, 2014)

In addition to these broad criticisms of the Basel approach, regulators in developing countries face particular challenges when they look to implement the standards. These are not a consequence of the regulatory stringency demanded by the standards, as pre-existing capital and liquidity requirements in developing countries are often higher than Basel standards. Instead implementation challenges arise from the excessive complexity of the standards, and the fact they are not designed with less developed financial markets in mind. Although the Basel standards do offer a menu of options to regulators, the full range of options proposed by the Basel Committee is not properly thought-through for low-income countries, resulting in their adoption of overly complex regulations for the level of economic development and complexity of their financial system (World Bank, 2012).

Overall, the available evidence, which we review in detail in Chapter 2, suggests that while there are strong arguments for strengthening the regulation and supervision of banks in peripheral developing countries, it is far from clear that the Basel standards and accompanying Basel Core Principles are the most effective approach (Barth and Caprio, 2018). The Basel Core Principles and the simplest set of international standards (Basel I) are widely regarded as useful for low and lower-middle income countries, but many experts question the appropriateness of the more complex Basel II and III standards, arguing that financial stability may be achieved through simpler regulatory approaches. Indeed, many question the appropriateness of Basel II and III for smaller banks even in the core of the financial system (Buckley, 2016). For this reason many regulators in core countries only subject their largest banks, typically those with balance sheets of US$20-30 billion, to the full suite of international banking standards (Castro Carvalho et al., 2017).

## The puzzling response of peripheral developing countries to Basel standards

Given the concerns outlined above, it's perhaps not surprising that the international policy advice to regulators in developing countries, particularly in smaller, low-income developing countries, is to proceed cautiously with Basel II and III. The World Bank, IMF and Financial Stability Board advise developing countries with less internationally integrated financial systems and/or with substantial supervisory capacity constraints, is to "first focus on reforms to ensure compliance with the Basel Core Principles and *only move to the more advanced capital standards at a pace tailored to their circumstances*" [emphasis added] (FSB et al., 2011, p. 14). Yet, peripheral developing countries are moving ahead to implement Basel II and III to a greater extent than this policy advice appears to warrant.

Data on the implementation of international standards in countries outside of the Basel Committee is patchy, but the evidence we have suggests that Basel standards are being widely implemented, including in many developing countries. A recent survey of 100 countries outside of the Basel Committee showed that 60 countries had national regulations based on Basel I, 10 countries had national regulations based on Basel II, and 30 on Basel III (Hohl et al., 2018). While the 2018 data is not disaggregated by income level, the 2015 survey data is. It includes data on Basel implementation in forty-five low and lower-middle income countries shows that more than half (26 countries) were implementing aspects of Basel II or III.

Closer scrutiny of the data shows that there is a high level of variation in the extent to which regulators in low- and lower- middle income countries are implementing international banking standards (figure 1.1). In practice Basel standards are compendia of different regulations, and regulators can choose how many of the different components to implement. The results show that, out of a possible total of twenty-two components of the latest and more complex international standards (Basel II, II.5, and III), regulators in nineteen of the forty-five countries were not implementing any, preferring to stay with simpler Basel I or sui generis standards. Regulators in a further twenty-one countries had implemented between one and nine components, while regulators in five countries implemented between ten and thirteen. Thus, while many regulators in low- and lower-middle income countries in the periphery are engaging with the latest international standards, they are doing so in a selective manner and there is a high level of cross-country variation.

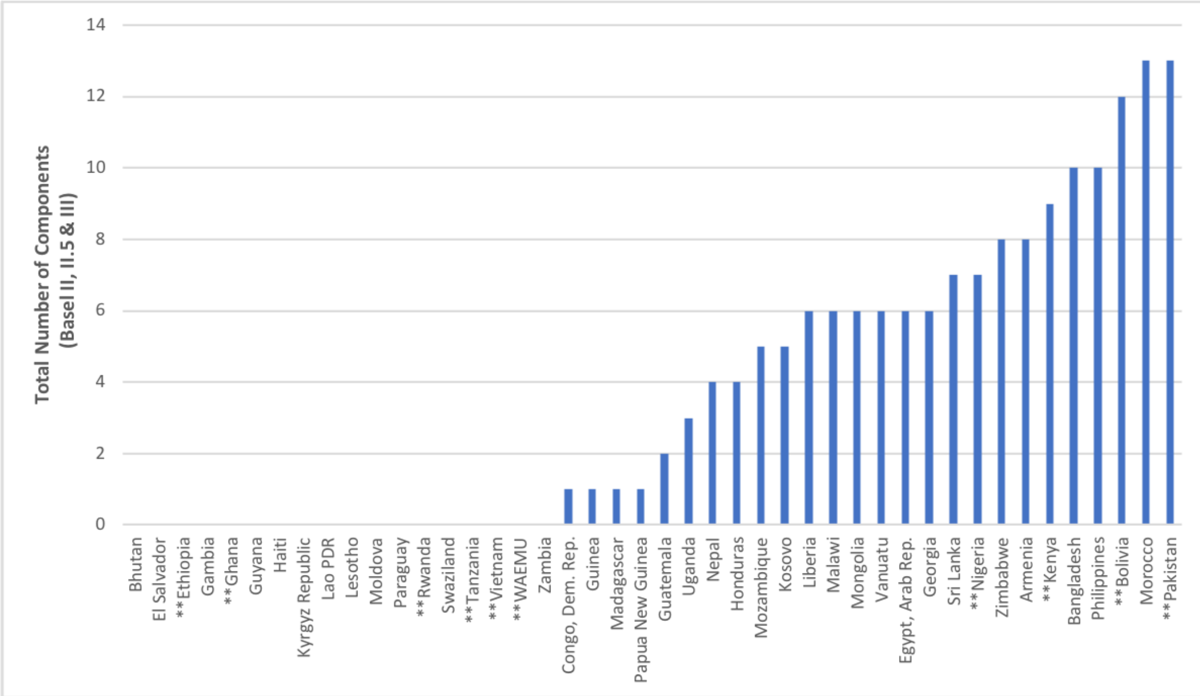


**Figure 1.1.** Implementation of international banking standards by low- and lower-middle income countries (2015)

**Note:** ** denotes a country that is studied in this volume

**Source:** Data from FSI Survey 2015 covering 100 jurisdictions outside of the Basel Committee, supplemented with data from case studies in this volume. Income categories are according to World Bank classifications for the same year (FSI, 2015)

Strikingly, there is substantial variation even among countries in the same geographic region. For instance, among countries in Eastern Africa, regulators in Kenya were implementing nine components in 2015, including aspects of the very latest Basel III standards, while neighbouring Tanzania, Rwanda and Ethiopia were implementing the much simpler Basel I standard. Similarly, in West Africa, Nigeria, Liberia and Guinea had adopted components of Basel II and/or III, but Ghana, Gambia and the eight francophone countries in the West African Economic and Monetary Union (WAEMU) had not.

What explains these patterns of convergence and divergence? Why is it that governments in some peripheral developing countries opt to converge on international standards, while governments in other countries opt to maintain divergent standards? This is the question at the heart of this book.

## Our argument in a nutshell

We examine the political economy of banking regulation in eleven peripheral developing countries and regions, four of which are classified as low-income (Ethiopia, Rwanda, Tanzania, and WAEMU) and seven as lower-middle income (Angola, Bolivia Ghana Kenya, Nigeria, Pakistan, Vietnam).[7] Low- and lower-middle income countries are in many ways the least likely to adopt the latest and most complex international standards (Basel II and III). They have relatively small

[7] The eight countries belonging to the West African Economic and Monetary Union (WAEMU) follow harmonised banking regulations and we study them as a single case. Seven of the eight countries are low-income. As at 2019, the World Bank defines low-income economies as those with a GNI per capita, calculated using the World Bank Atlas method, of $995 or less in 2017; lower middle-income economies are those with a GNI per capita between $996 and $3,895.

financial sectors and low levels of financial sector development and their regulatory institutions are particularly resource-constrained.

Drawing on a wealth of primary evidence, including interviews with more than two hundred regulators, bank employees, and experts, we trace the responses of each of these countries and regions to international banking standards since the late 1990s. We find that regulators our case study countries and regions have responded in very different ways to international banking standards, with their level of engagement increasing over time. At the start of our research project in 2015, only three of the eleven jurisdictions had implemented any components of Basel II and III (Pakistan, Kenya, and Nigeria). By January 2019, Ethiopia was the only country that had not implemented at least one component. While no government had fully implemented all eighteen components of Basel II and III, three governments had implemented ten or more components (Pakistan, Rwanda, WAEMU), and a further seven had implemented between three and nine components (Ghana, Tanzania, Kenya, Nigeria, Angola, Bolivia, Vietnam) (figure 1.2).

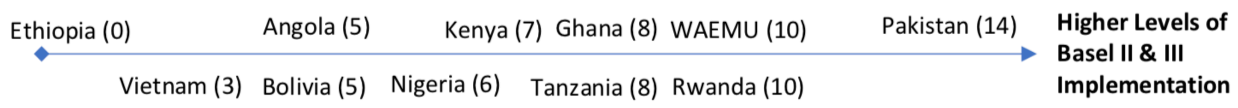


**Figure 1.2.** Implementation of international banking standards among case study countries (January 2019)

**Source:** Author's own analysis

Of course, implementation on paper may not lead to substantive compliance in practice. Regulatory authorities may issue regulations that are in line with international standards, but they may be intentionally lax in their enforcement, exercising regulatory forbearance. Scholars have labelled such situations as forms of 'cosmetic' or 'mock compliance' (Chey, 2016, 2006; Walter, 2008). Alternatively, regulatory authorities may be diligent in their supervision but lack the resources to properly monitor and enforce regulations. For their part, banks may comply with the regulations and bring their behaviour into line with regulatory requirements, they may endeavour to comply but fail because the regulations are too complex or cumbersome, or they may intentionally act to circumvent the regulations. Such practices have been documented among Basel Committee members, promoting scholars to question whether international the standards change regulatory behaviour in meaningful ways.[8]

In this book we are careful to distinguish between the implementation of international standards and substantive compliance with them. We use the terms 'adoption' and 'implementation' interchangeably, to refer to the incorporation of international standards into domestic regulations through enabling domestic legislation, the issuance of domestic regulations and guidance. We use the term 'compliance' to refer to the enforcement of these regulations by the relevant authorities and behavioural changes by banks. Empirically it is relatively straightforward to identify the extent to which a country is implementing international standards, as domestic regulations can be compared to international standards. It is much harder to gauge the level of substantive compliance. We focus on the former, seeking to understand why regulators in peripheral developing countries

[8] On Basel I implementation by Basel Committee members see (Chey, 2014; Quillin, 2008) On the failure of US and EU to implement Basel II and III respectively, see (Quaglia, 2019).

are adopting international standards, but also draw on a range of qualitative evidence to gauge levels of enforcement and substantive compliance.

Drawing on the rich empirical material from our case studies, we develop an analytical framework which sets out the political economy conditions under which we expect to see trajectories of convergence, divergence, or subversion in countries in the financial periphery. These are briefly set out below, and fully elaborated in Chapter 3.

### Incentives to converge

We identify four factors that provide strong incentives for regulators in peripheral developing countries to *converge* on international banking standards, above and beyond concerns about mitigating financial risk. Indeed, we find that concerns about mitigating financial risk is rarely the main driver of convergence.

The first originates from politicians pursuing a development strategy that identifies integrating into global finance as a path to prosperity. In much the same way as politicians in the past sought to emulate East Asia's tiger economies by creating national champions in the manufacturing sector to reap gains from international trade, a new generation of politicians is looking to position their countries as international financial centres like Singapore and Mauritius in order to reap gains from global finance. Politicians promote the implementation of the latest international banking standards in order to signal to potential international investors that the financial services sector is regulated under a sophisticated regulatory and supervisory set-up.

The second stems from large, internationally-oriented domestic banks that are seeking to expand into new international markets. As newcomers to international markets, banks from peripheral developing countries face a reputational deficit, and international third parties do not have sufficient information to readily ascertain whether they are soundly regulated. The adoption of international standards is a mechanism for signalling to regulators in host countries banks are soundly regulated. Regulators face strong incentives to adopt international standards in order to facilitate the international expansion of large domestic banks.

The third incentive stems from the engagement of regulators with their peers from other countries that are implementing international standards. The expansion of cross-border banking has been accompanied by the creation of transnational professional networks, through which bank regulators come together to exchange experiences and ideas about how best to regulate banks. Regulatory authorities also engage with each other through home-host supervisory relationships, as they work together to supervise international banks. We explain why regular interactions with peers who are implementing international standards provides strong incentives for regulators to follow suit.

Finally, regular interactions with international financial institutions like the IMF and World Bank can provide strong incentives for regulators to implement international standards. The IMF and World Bank provide extensive technical assistance and training, including in the area of bank regulation and supervision. While regulators often face strong incentives to follow the advice of these institutions, particularly when their country has an ongoing assistance programme, the advice from these institutions is not consistent with regards to international standards, sometimes encouraging adoption and sometimes advising against it.

### Incentives to diverge

Working in opposition to these incentives are four factors that generate incentives for regulators to *diverge* from international standards. The first of these originates from politicians pursuing interventionist financial policies, where the state plays an important role in allocating credit. The Basel framework is premised on market-based allocation of credit, with the government only stepping in to address market failures. Policy-directed lending and the general use of financial intermediaries as instruments of government policy are identified under the Basel framework as distorting market signals and impeding effective supervision. Thus, in countries where the government relies extensively on policy-directed lending, the Basel framework is unlikely to be an attractive basis for regulation.

Second, where politicians used their control over banks to allocate credit to political allies, or when powerful economic elites use banks to allocate credit to their own businesses and curry favour with politicians, these groups are likely to oppose the implementation and enforcement of international banking standards. Politicians and powerful economic elites are likely to resist moves to increase the quality of regulation and supervision and allocate more resources to regulators, moves that are required for the implementation and enforcement of international banking standards.

Third, regulators may be sceptical about the applicability of Basel standards for their local context, particularly the more complex elements of Basel II and III. Fourth, banks with business models focused exclusively on the domestic market in peripheral developing countries are likely to oppose the implementation of complex regulations due to the additional compliance costs this generates. Opposition is likely to be strongest from small, weak banks, for whom the costs of implementation are highest.

## Dynamics of convergence and divergence

As the political, economic, and institutional context differs across peripheral developing countries, regulators experience these incentives through different channels and with varying levels of intensity, prompting them to respond differently to international standards. We explain why pathways of convergence on international standards, or divergence from them, are likely to differ depending on which actor leads these processes. We distinguish between different pathways to convergence and divergence according to whether they are policy-driven, politically-driven, regulator-driven, bank-driven, or IFI-driven, and we identify the salient features of these pathways. We also explain why, when faced with strong and competing incentives to converge and diverge, regulators are likely to respond with 'mock compliance', whereby international standards are adopted on paper but not enforced in practice.

Our analytical framework focuses on three main actors: the regulator (usually situated within the central bank), large banks, and incumbent politicians. Regulatory outcomes are the product of the relative power position of these three actors within society, and are shaped by the wider domestic and international context in which they are embedded. Central to our argument is the observation that banks are rarely the most dominant actor in regulatory politics in peripheral developing countries, particularly the low- and lower-middle income countries we focus on. While there are some exceptions, the underdeveloped nature of the formal economy and relatively small size of the banking sector in leaves individual banks, and the banking sector as a whole, with much less power to shape regulatory outcomes than in many advanced economies. Yet this does not mean that financial market players have little purchase on regulators' decisions. Far from it. Operating in a context of capital scarcity, regulators, politicians and banks in peripheral developing countries are particularly attuned to the ways in which regulators, banks and investors in other countries will react to their decisions, and, as we explain below, this has an out-sized impact on regulatory outcomes (see also Mosley (2003a)).

It is this dynamic that sets regulatory harmonisation between the core and periphery apart from regularity harmonisation among core countries. In explanations of regulatory harmonisation among core countries, the interests of large domestic banks looms large. For instance, in his seminal work, Singer (2007) argues that regulators as face a dilemma of increasing regulatory requirements in order to mitigate the risk of financial crisis, or easing those requirements and enhancing the international competitiveness of the domestic financial sector (Singer, 2007, p. 19). It is these trade-offs that shape the nature of regulatory harmonisation among core countries. In this chapter we show how regulators in the periphery face a different dilemma, namely that of implementing overly-complex and costly international standards to attract capital and help their banks expand abroad, or eschewing those standards to focus on regulations better attuned to supporting their financial sector development.

Strikingly, and in contrast to our initial expectations, we find that the presence of foreign banks does not provide regulators in peripheral developing countries with strong incentives to converge on international standards. Rather than lobby for the adoption of complex and costly global standards to gain a competitive edge over domestic banks, we explain why foreign banks typically adapt their business models to the local context, adopting a similar stance to domestic banks when it comes to regulation in their host jurisdiction.

## Contribution to scholarship

Our primary contribution is to develop a new framework that specifies the channels of regulatory interdependence between countries in the core and the periphery of the global financial system, and to probe its explanatory power through in-depth analysis in eleven countries in Africa, Asia and Latin America.

We draw on, and contribute to, the literature on diffusion by parsing out the specific ways that cross-border relationships between regulators, politicians and banks in peripheral developing countries and a variety of international actors generate incentives to converge on international standards. Scholars have highlighted the ways in which international organisations like the IMF and World Bank have promulgated international standards and the development of financial markets (Lavelle, 2004; Mosley, 2010, 2003b; Wilf, 2017), highlighted the incentives that markets generate (Simmons, 2001), how other states harness the reputational dynamics in global markets to pressure convergence (Sharman, 2009, 2008), and the ways in which transnational networks generate processes of learning and emulation that drive convergence (Dobbin et al., 2007; Porter, 2005).

This literature is important in identifying the mechanisms through which international standards spread from the core to the periphery, but tells us little about how actors in peripheral countries engage with these processes and why these mechanisms generate convergence in some peripheral countries but not others. In Jones and Zeitz (2017) we show that there is a correlation between level of financial sector development and the extent of Basel adoption, which suggests that regulators' decisions are strongly influenced by the suitability of the Basel standards to their country's level of financial sector development, but this doesn't explain why countries with similar levels of development respond differently to international standards.

We also draw on a substantial literature on the politics of financial regulation in developing countries and emerging economies. This helped us identify the ways in which domestic politics and institutions is likely to shape responses to international standards. A few scholars have looked specifically at how individual peripheral countries respond to international financial standards and shown how reformist coalitions can drive the adoption of international standards, often in the face of entrenched vested interests Walter (2008) and Chey (2007, 2014). Haggard and Maxfield (1996) and Martinez-Diaz (2009) examine the politics surrounding capital account liberalisation and bank ownership respectively, and highlight the role that financial crises have in reconfiguring domestic politics and generating reforms. Others show how varying distribution of power among firms, banks and governments shapes regulatory outcomes (Haggard and Lee, 1995) and how political economy dynamics help account for variation in the strength of regulatory institutions (Hamilton-Hart, 2002). We contribute to this literature in highlighting the ways in which different configurations of domestic politics and institutions generate different incentives at the national level for actors to embrace or eschew international standards, and the ways in which trajectories of convergence and divergence are likely to differ depending on whether they are led by politicians, regulators or banks.

The way we have approached this work is very much in the spirit of the new interdependence approach in international political economy, which draws attention to the global economy as a hierarchy of interdependent networks (Farrell and Newman, 2016, 2014; Oatley, 2016; Oatley et al., 2013; Quaglia and Spendzharova, 2017). This literature seeks to capture relations of interdependence in ways that has not been possible in the open economy approach that has dominated international political economy in recent years. We contribute to a strand of this literature that is starting to grapple with core-periphery dynamics (Bauerle Danzman et al., 2017).

Our second contribution is to draw attention to the politics of financial regulation in peripheral developing countries and, in doing so, link debates in international political economy to a set of countries that scholars rarely engage with, and shed light on a topic that is rarely examined by scholars in area studies.

There is a vast, and growing, literature on the politics of financial regulation within and among countries in the core of the global financial system (See for instance Botzem, 2014; Büthe and Mattli, 2011; Haber and Calomiris, 2015; Helleiner, 2014; Kapstein, 1989; Lall, 2012; Lavelle, 2013; Oatley and Nabors, 1998; Perry and Nölke, 2006; Porter, 2005; Quaglia, 2019, 2014; Singer, 2007; Tarullo, 2008; Underhill and Zhang, 2008; Young, 2012; Zysman, 1984). Scholarship on the politics of financial regulation in emerging economies and developing countries is equally insightful yet much less extensive and has tended to focus on the largest emerging and developing countries (Chey, 2014; Haggard and Lee, 1995; Hamilton-Hart, 2002; Hutchcroft, 1998; Knaack, 2017; Lavelle, 2004; Martinez-Diaz, 2009; Naqvi, 2018; Walter, 2008). This reflects a tendency among scholars of international political economy, and international relations more broadly, to focus on countries with the largest economies on the grounds that they exert systemic influence over the global economy and the way it is governed (Drezner, 2008). Yet, as Acharya (2014) forcefully argues, the result is that the discipline "does not reflect the voices, experiences, knowledge claims and contributions of the vast majority of societies and states in the world, and often marginalizes those outside of the core countries of the West".

A particularly striking gap in the literature is the dearth of attention paid to the politics of financial regulation in African countries, and low- and lower-middle income countries in other regions. Economists have studied the financial regulation in these countries from various vantage points and sought to identify reforms that will support development, including Beck et. al. (2011), Murinde (2012), and Gottschalk and Griffith-Jones (2016). Yet few political scientists have examined the politics of financial regulation, despite the central role played by the financial sector in economic development. Notable exceptions include Boone (2005), who seeks to explain variation in financial sector reforms across African countries and attributes this to differences in the strength, diversity and autonomy of private capital vis a vis the state. Lewis and Stein (1997) who study the politics of financial reform in Nigeria and attribute failure to weaknesses in the capacity of state institutions and private banks. More recently, Dafe (2017) examines the how sources of capital shape the policy stances of central banks in Nigeria, Kenya and Uganda, while Soares and Ferreira (2018) analyse the evoluation of banking in Angola. For almost all of our case study countries and regions, our chapters are the first attempt to systemically analyse the politics of financial regulation.

## Policy implications

Our research has substantial policy implications. There is growing consensus among international policymakers that countries outside of the Basel Committee, particularly developing countries, should be selective in their implementation of international standards and adopt a proportional approach (Barth and Caprio, 2018; Hohl et al., 2018; Restoy, 2018). Yet this well-intentioned advice overlooks the powerful reputational, competitive and functional incentives generated by financial globalization that, as we show, may lead regulators to adopt international standards even if they are ill-suited to their local context.

Our research highlights that there is room for manoeuvre at the national level. Selective implementation of international standards and careful adaptation of the standards to suit the local context can help regulators to address the challenges they face. The reputational and competitive incentives to converge on international standards derive from the fact that regulators in other countries, as well as international investors and other market actors, face imperfect information about the quality of regulation and supervision in peripheral developing countries. While implementing Basel II and III is a useful signal of quality, regulators appear to derive similar signalling effects irrespective of whether they partially or fully implement the standards. Similarly, while Basel standards may not correspond to the prudential needs of developing country regulators as designed, they can be adapted. For example, the Central Bank of the Philippines has recalibrated the risk-weights associated with lending to small and medium-sized enterprises to ensure that banks are not unduly dissuaded from lending to them.[9] Given the acute resource-constraints that regulators in peripheral developing countries face, there is a strong argument for greater sharing of information and experiences among peripheral regulators on the various ways to adapt international standards to better suit their needs.

Our research also provides a compelling argument for reforming international standards and standard-setting processes so that international standards better reflect the interests of countries in the financial periphery. We show how, in today's world of globalised finance, regulators in peripheral developing countries cannot simply ignore international standards even when they are not appropriately designed for their jurisdiction, as this carries significant reputational risks. Financial regulators in peripheral developing countries face the challenge of harnessing the prudential, reputational and competitive benefits of international banking standards, while avoiding the implementation risks and challenges associated with wholesale adoption.

So far, the international policy community has adopted a minimalist 'do no harm' approach when it comes to international banking standards, seeking to establish where there have been negative unintended consequences for developing countries and only then looking for remedies (e.g. FSB, 2012, 2014). Much more could and should be done at the design stage to ensure that international standards work for peripheral developing countries. While international experts are increasingly advising developing countries to take a proportional approach to the implementation of international standards (Hohl et al., 2018; Restoy, 2018), regulators in developing countries are left the onerous task of figuring out exactly how to modify international standards to suit their local context. Instead, proportionality could be built much more systematically into international standards at the design stage, so that this resource-intensive task adjusting standards is not left to the regulators with the least resources. Related to this, standard-setting processes could be opened up to more meaningful input from regulators from peripheral developing countries. While consultative mechanisms exist, they fall far short of providing peripheral developing countries with voice in standard-setting processes (Jones and Knaack, 2019).

## Structure of the book

This book is divided into three parts.

### Part I: Introduction, cross-country variation, and analytical argument

Following this introduction, **Chapter 2** analyses in more detail the context for banking regulation in peripheral developing countries, the evidence on the merits and demerits of Basel standards for developing countries, and ways in which peripheral countries are, in practice, responding to Basel II and III. **Chapter 3** provides an analytical framework that explains why we can expect regulators in peripheral developing countries to responding in different ways to international banking standards. It builds from the existing literature and the case studies in this volume to identify the conditions

[9] Discussion with senior regulator from the Philippines, via Skype, September 2018

under which we can expect countries to converge with, diverge from, or subvert international standards.

In the subsequent chapters, we present our eleven country case studies, using the analytical framework to guide our analysis. Each chapter follows the same format, to facilitate cross-case comparison. Each chapter starts by providing an analysis of the key features of the financial sector and salient political economy dynamics, noting any major shifts over time. It then assesses the extent to which the country has based its national regulations and supervisory practices on international standards, looking specifically at the adoption and implementation of Basel I, II, III and compliance with the Basel Core Principles. The heart of each case study is a political economy explanation for these regulatory decisions, which engages with the analytical framework. Each case study concludes with a summary of the main insights.

## Part II: Country case studies

We present our case studies according to the extent to which they have converged on international standards, starting with the highest adopters, and the specific pathway through which convergence and divergence occurred. This sequence is summarised in table 1.1 and followed by short summaries of each case study.

| **Country** | **Pathway** | **Outcome (number of Basel II and Basel III components implemented out of max. 18)** |
|---|---|---|
| Pakistan | Policy-driven convergence | Ambitious implementation (14) |
| Rwanda | Policy-driven convergence | Ambitious implementation (10) |
| Ghana | Policy-driven convergence | Ambitious implementation (8) |
| WAEMU | IFI-driven convergence | Ambitious implementation (10) |
| Tanzania | Regulator-driven convergence | Selective implementation (8) |
| Kenya | Regulator-driven convergence | Selective implementation (7) |
| Bolivia | Regulator-driven convergence | Selective implementation (5) |
| Nigeria | Regulator-driven mock compliance | Mock compliance (6) |
| Angola | Politically-driven mock compliance | Mock compliance (5) |
| Vietnam | Politically-driven mock compliance | Mock compliance (3) |
| Ethiopia | Policy-driven divergence | No implementation (0) |

**Table 1.1.** Pathways to convergence and divergence among case study countries

**Notes:** Ambitious implementation = includes at least one of the more complex components (internal models under Basel II and/or liquidity or macro-prudential / liquidity standards under Basel III); Selective implementation = standardised approaches under Basel II and only micro-prudential capital requirements under Basel III; Mock compliance = on paper, not enforced

**Source:** Author’s own analysis

### Policy-driven convergence

In three cases, politicians championed convergence on international standards. In **Chapter 4**, Natalya Naqvi explores the politics of adoption in **Pakistan**, which has the highest level of implementation among our case study countries. The impetus for converging on international standards has come from different actors over time. The adoption of Basel I adoption in the 1980s was driven by the World Bank and IMF. In the 1990s and early 2000s, the adoption of Basel II was driven first by a politicians promoting the expansion of financial services, and then by banking sector regulators. Most recently, as banks have internationalised, they have championed the implementation of Basel III. Pakistan is one of the few cases where all three major actors – politicians, regulators, and major banks – are now aligned behind the implementation of the standards, leading to a high and ambitious level of implementation.

As Pritish Behuria shows in **Chapter 5**, for many years the **Rwandan** government showed little interest in moving beyond Basel I. However, in 2015, the government's stance changed and politicians made a formal commitment to the rapid adoption and implementation of Basel II and III. This exuberance for adopting global standards is puzzling given that Rwanda's financial sector remains largely underdeveloped and the government is aims to become a developmental state. The motivations behind this policy shift are to reduce risk in the financial sector, encourage harmonisation of financial sector regulation across the East African Community (EAC), and to develop a service-based economy, including by making Kigali a financial hub. The adoption and implementation of the latest international banking standards has become a strategic policy priority for Rwanda's economic leadership.

In **Chapter 6**, Emily Jones explores the stop-start dynamics of Basel implementation in **Ghana**, a pattern that reflects party politics. The main driver for implementing Basel standards has been the development strategy of the New Patriotic Party (NPP), a party with strong ideological and material connections to international finance, and a vision for positioning Ghana as a financial services hub for West Africa. The drive to converge with international standards has come from a small group of NPP politicians and closely aligned officials in the Bank of Ghana with strong connections to international financial institutions. In contrast, the National Democratic Congress (NDC) focused on directing finance to the productive sectors of the economy and supporting indigenous banks. Moves to implement Basel and other international standards have coincided with periods when the NPP has been in office. In 2017 the NPP government embarked on a radical reform of the banking sector, implementing major elements of Basel II and III and catapulting Ghana to among the most ambitious implementers of Basel standards among our case study countries.

### IFI-driven convergence

In **Chapter 7** Ousseni Illy and Seydou Ouedraogo examine the politics of implementation in the West African Economic and Monetary Union (**WAEMU**). As with Ghana and Rwanda, after implementing Basel I for many years, WAEMU moved to adopt Basel II and III standards in 2016 and began implementation in 2018. Given the weak development of the financial sector in the Union and its poor connectedness to the international financial system, this reform was unexpected. The adoption of Basel standards has been championed by the Central Bank of West African States (BCEAO), under the influence of the IMF, which has strongly encouraged implementation. National governments and domestically-oriented banks have not played an active role, complicating the implementation and enforcement of the new regulations. The Central Bank is embedded in regulatory peer networks, has close links with the IMF, and is insulated from domestic political pressure due to its supranational position.

### Regulator driven convergence

In **Chapter 8,** Radha Upadhyaya examines adoption in **Kenya**. The impetus for Basel implementation has come from the regulator, the Central Bank of Kenya (CBK), which is a highly independent, has strong links to international policy networks and is very receptive to international policy ideas. Since 2003, the incumbent politicians have also been keen to adopt the latest international standards in order to attract investment into Kenya's financial sector. Meanwhile, as the banking sector is relatively well capitalised, there has been little opposition from banks, with some international and large local banks being mildly in favour of Basel II and III adoption. In the Kenyan case the regulator has been the driving force for Basel adoption, supported by internationally-oriented politicians and banks.

**Tanzania** has been a slow and cautious adopter of Basel standards, as Hazel Gray explains in **Chapter 9**, although recent moves to implement the standards have led to a relatively high level of adoption. Tanzania only finished implementing risk-based supervision in 2009 and opted for selective implementation of Basel II and III standards beginning in 2017. From 1991 to 2008 Tanzania liberalised its financial sector under influence of the IMF and World Bank, but a significant gap emerged between the formal commitment to adopting Basel standards and the actual pattern of implementation and enforcement. It was only from 2009 onwards that Basel implementation was prioritised due to the appointment of a new Governor at the Bank of Tanzania (BoT) with strong connections to the international policy community, and the influence of regional commitments to regulatory harmonisation. The central bank adopted a selective and tailored approach to Basel adoption, with different regulatory requirements for development banks. Domestic and foreign banks initially showed little interest in implementation but their preferences have shifted due to pressures from parent banks and anti-money laundering concerns.

In **Chapter 10,** Peter Knaack explores why **Bolivia** has very ambitious plans to implement Basel standards, but these only partly came to fruition. A novel financial services law promulgated by the regulator in 2013 established the legal framework for a wholesale adoption of Basel II, including all advanced internal-ratings based components, and elements of Basel III. It is puzzling to see such a whole-hearted embrace of Basel standards by a domestically-oriented left-wing government that follows a heterodox approach to economic policymaking. Basel adoption has been driven by a regulatory agency that is embedded in transnational technocratic regulators networks and actively seeks to implement international standards. Bolivian regulators wrote a wide range of Basel rules into the draft legislation. But Bolivian politicians, prioritising the twin goals of financial stability and inclusive growth, grafted onto this legislation significant interventionist policies. Thus, Bolivia's Basel adoption is pulling in two directions: adherence to Basel Committee-style best practices and, concurrently, financial interventionism to stimulate economic growth and financial inclusion.

**Regulator-driven mock compliance**

In **Chapter 11**, Florence Dafe examines **Nigeria's** engagement with international standards where regulators have gradually adopted Basel I, II, and III, although implementation and enforcement has been slow. The impetus for Basel adoption has become primarily from regulators, who are embedded in international policy networks. They consider Basel II and III the most appropriate set of regulatory standards to stabilise and manage risk in Nigeria's large, internationalised banking sector. While Basel adoption was not a salient issue among Nigeria's politicians, Nigeria's large internationally active banks welcomed the implementation of Basel II as an important means to enhance their competitiveness and signal soundness to markets. However implementation and enforcement has been slow, as regulators have conflicting preferences: while promoting Basel II adoption, they are reluctant to move faster on implementation and enforcement because it might trigger regulatory interventions in several fragile domestic banks. These banks play an important role in providing employment and access to finance for the private sector, and their resolution would meet with resistance from politicians and lead to a loss of confidence in Nigeria's banking sector.

**Politically-driven mock compliance**

In **Chapter 12**, Rebecca Engebretsen and Ricardo Soares de Oliveira examine **Angola's** adoption of Basel standards. As in other resource-rich countries, the financial sector in Angola plays a key role in facilitating outgoing financial flows. The banking sector is also highly politicised, as loans are extended, often without collateral, and bank licenses issued to political insiders. The political allocation of credit has been an important avenue for securing political support for the regime. The result has been strong opposition to the ratcheting up of bank regulation and supervision. Yet a balance-of-payments crisis in 2009, falling in oil prices from 2014, and changes in the global regulatory environment together meant that divergence from international standards was no longer an option. For Angolan banks to maintain their links to the global financial market, the country needed to signal its readiness to regulate the sector in line with international standards. The result has been an upsurge in regulatory efforts since 2009, and especially since 2014. Yet, because the politicised nature of the banking sector has not changed, standards are either not implemented or are implemented but not enforced, leading to a situation of 'mock compliance'.

The implementation of international banking standards in **Vietnam** has been the subject of contestation between reformist and conservative factions within the governing political party, as Que Giang Tran Thi and Tu Anh Vu Thanh explain in **Chapter 12**. In any given period, the speed of implementation has been affected by which of these factions dominates regulatory decision-making, as well as the health of the banking sector. The adoption and implementation of Basel standards in Vietnam has gone through three distinctive periods: from 1999–2006, the reformist faction pursued international regulations in order to discipline state-owned banks and improve the functioning of the financial sector. From 2006-13, the central bank (SBV) formally adopted Basel II but a domestic banking crisis effectively halted implementation. More recently there has been a return to pro-Basel preferences. However, interventionist financial policies, high implementation costs, the low internationalisation level of the banking sector, and the lack of competent technocrats inside both the State Bank of Vietnam and domestic private banks have all contributed to a high level of regulatory forbearance.

### Policy-driven divergence

In **Chapter 14**, Toni Weis explains why **Ethiopia** has chosen to diverge from international standards and not to adopt any aspect of Basel II or III. Ethiopia has the least internationalised banking sector among our case countries. Despite significant exposure to the Basel standards through donors and the IMF, banking supervisors at the National Bank of Ethiopia (NBE) have little use for Basel II and III. Ethiopia's decision to diverge from international the Basel framework results from a strong preference for political control over the financial industry. The Ethiopian government seeks to emulate the example of East Asian 'tiger' economies, for whom financial repression was a key tool in the pursuit of rapid industrialisation. However, as Ethiopia's domestic banks struggle to sustain transformative growth, pressures for greater financial openness (and, by extension, for increased regulatory convergence) are beginning to mount.

## Part III: Conclusion

The book ends with a short **Conclusion (Chapter 15)** that distils comparative insights from across the case studies, identifies areas for future research, and distils policy recommendations. It makes the case for reforming the key institutions of global financial governance to increase the voice and influence of actors from countries in the periphery.

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