ULOGA SUPERVIZORA U OČUVANJU I JAČANJU BANKARSKOG SEKTORA REPUBLIKE SRPSKE

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Apstrakt

Bankarski sektor predstavlja komponentu bankarskog sistema i ukupne ekonomije države, koja ima značajan uticaj na opšti ekonomski ambijent u kojem se realizuju sve poslovne, finansijske aktivnosti ekonomskih subjekata, kao i sva ekonomska dešavanja koja su od značaja za nacionalnu privredu. Poslovne banke okrenute su, s jedne strane, prema upravljačkoj menadžerskoj strukturi banke, a s druge strane državnim kontrolnim institucijama. Regulatori bankarskog sektora nastoje kroz definisane instrumente i zakonsku regulativu očuvati i jačati stabilnost bankarskog sektora, te unaprijediti njegovo sigurno, kvalitetno i zakonito poslovanje.

Odsustvo regulative, neadekvatna regulativa i neadekvatan kapacitet regulatornih tijela i te kako su uticali na stanje u bankarskom sektoru kakvo prepoznajemo danas, odnosno u periodu nakon poslednje ekonomske krize. Stanje je dodatno otežala pandemija COVID-19 koja je u kratkom periodu prouzrokovala pad ekonomske i društvene aktivnosti, kojim su obilježene 2020. i prva polovina 2021. godine. Posljedice će se pokušati umanjiti uvođenjem nove, sveobuhvatnije regulative, uz neizvjesnost da li će regulatorno tijelo biti u stanju da preventivnim djelovanjem spriječi produbljivanje krize bankarskog sektora.

Agencija za bankarstvo Republike Srpske vrši superviziju funkcionisanja bankarskog sektora Republike Srpske, kao i opšteg ambijenta u kojem se nalazi bankarski sistem. Cilj rada je analizirati uticaj krize uzrokovane pandemijom COVID-19 na bankarski sector Republike Srpske, i to kroz kvantitativne pokazatelje - visinu ukupnih depozita/štednje sa jedne strane, te bankarske plasmane i kvalitet aktive sa stanovišta kreditnih gubitaka u periodu 30.06.2019-30.06.2021. godina, sa druge. Rezultati pokazuju da je u posmatranom periodu evidentan rast depozita, ali i povećanje kreditnih aktivnosti u bankarskom sektoru

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Republike Srpske. Zaključak istraživanja ukazuje na to da kriza uzrokovana pandemijom COVID-19 nije poljuljala povjerenje u bankarski sektor, odnosno da promjene nisu bile toliko značajne da bi mogle imati opredjeljujući uticaj na kretanja analiziranih finansijskih pokazatelja u periodu pandemije.

Rad je struktuiran na način da obuhvati kako teorijske principe, tako i konkretno empirijsko istraživanje o uticaju supervizije na jačanje stabilnosti bankarskog sistema.

Ključne riječi*: supervizor, osigurani depozit, finansijska stabilnost, COVID-19*

JEL: E52, E59.

Uvod

Kriza uzrokovana pandemijom COVID-19, koja se pojavila početkom 2020. godine, značajno je uticala ne samo na zdravlje ljudi, već i na privrede i društva širom svijeta. Lokdaun, ograničenja i zabrane kretanja, promjene u načinu rada, smanjenju ukupne društvene i ekonomske aktivnosti doveli su do velikih promjena u potrošnji stanovništva. Najznačajnije promjene uočavaju se u smanjenju potrošnje u sektorima turizma, ugostiteljstva i saobraćaja, odnosno u povećanju potrošnje u sektorima prehrambene industrije i kućnih potrepština.

Kreiranje ekonomskog, finansijskog ambijenta u kojem će se odvijati finansijske, bankarske aktivnosti jedne zemlje, posebno u uslovima pandemije COVID-19, nije ni najmanje jednostavan zadatak. Obzirom da su ekonomski odnosi složeniji u uslovima pandemije, država mora biti pažljivija u definisanju i sprovođenju svih strategija kojim se usmjerava ekonomska aktivnost države.

Da bi se odgovorilo na otežane uslove poslovanja, potrebno je preduzeti niz mjera u bankarskom sektoru. Bankarski sektor u Republici Srpskoj čini 8 banaka, sa ukupnom aktivom od 10,3 milijarde KM i oko 3.000 zaposlenih radnika. Država treba da se postara da kreira adekvatnu regulativu bankarskog sektora koja je, pored ostalih preduslova uspješnog poslovanja, svakako jedan od osnova stabilnog ekonomskog sistema države. Supervizija ima veoma značajnu ulogu u finansijskom sektoru, jer u zavisnosti od alata koje primjenjuje i uticaja koji ima, određuje okruženje u kojem će se obavljati poslovna aktivnost svakog učesnika pojedinačno, odnosno opšta stabilnost finansijskog sektora.

Države danas superviziju kreiraju uglavnom po ugledu na razvijene uspješnije zemlje, trudeći se da maksimalno iskoriste provjerene strategije. Supervizijom banaka kreira se opšte okruženje koje svim bankama daje jednake šanse, a od same banke zavisi da li će i u kojoj mjeri te mogućnosti iskoristiti.

U praksi se mogu identifikovati pravilnosti u pogledu određenih stavki u poslovanju banke. Odnosno, analizom niza raspoloživih indikatora koji pokazuju stepen razvoja, mogu se utvrditi uspješnost poslovanja banke i potencijal za njen dalji razvoj. Na osnovu analize rezultata poslovanja može se i predvidjeti pozicija banke na tržištu u komparaciji sa konkurentnim bankama.

Analiza međuzavisnosti supervizije i poslovanja banaka veoma je značajna. Važno je utvrditi pravilnosti u ponašanju banaka, kao i ispitati uticaje eksternih faktora na korišćenje internih prednosti banaka. U suštini, supervizijom banaka treba omogućiti jedno kompetetivno okruženje, tržište koje će regulatorno biti podešeno i usmjereno na rast i razvoj svakog njegovog učesnika. S obzirom da se u godinama pred nama očekuju još veće neizvjesnosti u poslovanju i rizici na savremenom tržištu, svaka država mora što prije kreirati svoj stabilan ekonomski sistem, stabilno političko i socijalno okruženje koje će omogućiti podsticaje daljem rastu i razvoju zemlje.

Osnovni cilj rada jeste utvrditi ulogu supervizora u očuvanju i jačanju bankarskog sektora na teritoriji Republike Srpske.

Agencija za bankarstvo Republike Srpske (u daljem tekstu: ABRS) predstavlja supervizora u funkcionisanju bankarskog sektora, odnosno opšteg ambijenta u kojem se nalazi finansijski sektor u Republici Srpskoj. Status, organizacija, finansiranje, nadležnosti i rad ABRS kao i osnovni cilj -očuvanje i jačanje stabilnosti bankarskog sistema uz unapređenje njegovog sigurnog, kvalitetnog i zakonitog poslovanja, propisani su Zakonom o Agenciji za bankarstvo Republike Srpske.

Predmet rada je uticaj ABRS na bankarski sektor, sa akcentom na dešavanja u sljedećim područjima: visina ukupnih depozita/štednje sa jedne strane, te uticaj na bankarske plasmane i kvalitet aktive sa stanovišta kreditnih gubitaka u periodu 30.06.2019-30.06.2021. godina, sa druge.

Rad je struktuiran na način da obuhvati teorijske principe i konkretno empirijsko istraživanje o značaju supervizije u jačanju stabilnosti bankarskog sistema. Cilj rada jeste dobijanje jasnije slike i bolje razumijevanje stabilnosti bankarskog sektora, te povjerenja u banke u uslovima pandemije. Konačan cilj rada je ukazati na, prednosti i nedostatke nadzora bankarskog sektora RS od strane ABRS, te uticaj iste na dalji razvoj finansijskog tržišta u Republici Srpskoj.

Supervizija bankarskog sektora

Suština supervizije bankarskog, odnosno finansijskog sistema jedne države je prvenstveno zaštita deponenata, investitora i akcionara finansijskih institucija od različitih rizika kojima su izloženi. Jedan od značajnijih ciljeva supervizije je umanjiti posljedice loše prakse i prevare, odnosno izolovati efekte svakog gubitka koji proizvodi određena institucija, sprečavajući tako nastanak potencijalnog „domino efekta“.

Banka u okviru finansijskog sistema ima ulogu da obezbijedi kredite, prima depozite i pruža druge finansijske usluge klijentima, poštujući striktne zakonske propise koji su pripremljeni prvenstveno u cilju zaštite interesa javnosti. Da bi se funkcija supervizije banaka efikasno vršila neophodno je i postojanje adekvatnih resursa i zakonskih ovlaštenja za sprovođenje oprezne supervizije, uspostavljanje nezavisnih regulatornih i supervizorskih autoriteta, kao i jasno definisanje odgovornosti supervizora u procesu vršenja supervizorskih aktivnosti.

Reforma bankarskog sistema usmjerena je na prevenciju krize, efikasniji nadzor nad bankarskim sistemom, blagovremenom intervenisanju supervizora u slučaju pogoršanja finansijskog položaja banaka i utvrđivanja ovlaštenja i instrumenata za upravljanje procesom izlaska propalih banaka sa tržišta, uz minimalno oslanjanje na javna sredstva.

Regulacija i supervizija poslovanja banaka podrazumijevaju se u tržišnim uslovima privređivanja.

Razdvajanje funkcije upravljanja i rukovođenja, uz postojanje asimetričnih informacija dovodi do problema u odnosima između vlasnika banaka (principala) i menadžera banaka (agenata). Nezadovoljni podrškom koju imaju od strane vlasnika, menadžeri banaka često nisu zainteresovani za maksimiziranje dobiti jednako kao i sami vlasnici banaka i, u želji da ostvare lične koristi, mogu da se odluče i na sprovođenje određenih „sumnjivih“ aktivnosti sa kojima vlasnici banaka nisu upoznati.

Povećana i strožija regulacija aktivnosti banaka, u prvi plan stavlja konkurenciju poslovnih banaka i njihovo aktivno učešće na finansijskom tržištu. Poslovne banke daju akcenat profitabilnosti plasmana, u uslovima promjenljivih kamatnih stopa i fluktuirajućih deviznih kurseva, uz prihvatanje većeg rizika kako bi ostale konkurentne na finansijskom tržištu.

U cilju smanjenja uticaja sistemskog rizika na poslovanje banaka, nužno je uspostaviti novi oblik kontrole putem supervizije banaka, a u cilju očuvanja njihove sistemske stabilnosti. Supervizijom banaka donose se pravila koja stvaraju tržišnu disciplinu i motivišu privatni monitoring banaka koji dokazano ima uticaj na poslovanje banaka, a time i na poboljšanje uticaja bankarstva na cjelokupnu ekonomiju.

ABRS kroz superviziju i mjere za otklanjanje utvrđenih nepravilnosti i slabosti ima za cilj da obezbjedi stabilan, solventan, likvidan i profitabilan bankarski sistem Republike Srpske. Otežavajuća okolnost za regulatora u realizaciji poslovnih aktivosti je ta što banke, odnosno finansijske institucije u potrazi za profitom imaju dobar motiv za izbjegavanje postojećih propisa i traženje „rupa u zakonu“, pronalazeći način da izbjegnu propise, zbog čega regulator mora iste da modifikuje. U finansijskom sistemu u kojem su promjene veoma česte, regulatorni organi se često suočavaju sa novim izazovima, jer ukoliko na promjene ne odgovore brzo, neće uspjeti da spriječe finansijske institucije da se upuste u prevelike rizike. Takođe, otežavajuća okolnost za regulatora su i „sitnice“ koje mogu biti od izuzetnog značaja, jer ukoliko se u podacima pojave i najmanje razlike, one mogu prouzrokovati nesagledive posljedice. Međutim, iako prema zakonskom okviru ABRS ima operativnu nezavisnost, sam kontekst u kojem posluje otežan je zbog značajne međuzavisnosti između Vlade i domaćeg bankarskog sektora čiji uticaj nije zanemarljiv.

ABRS je odlukama (2020. godina) o uvođenju privremenih mjera kako bi se ublažile negativne posljedice uzrokovane virusom COVID-19, preduzela aktivnosti u cilju očuvanja stabilnosti bankarskog sektora Republike Srpske. Mjere su se odnosile na odobravanje olakšica klijentima banke koji su pogođeni negativnim efektima pandemije, kako bi prevazišli poteškoće sa kojima se suočavaju i u narednom periodu uredno izmirivali svoje obaveze prema banci. Takođe, mjere su se odnosile i na određena pravila za upravljanje kreditnim rizikom i očuvanjem kapitala banaka i dr.

Osiguranje depozita

Potreba zaštite depozita poslovnih banaka prouzrokovana je nestabilnom situacijom na svjetskom finansijskom tržištu. Finansijski sektor se ubraja u red najstrože regulisanih sektora u privredi, a banke se najviše regulišu od svih finansijskih institucija. Regulatorni procesi ne funkcionišu uvijek kako se očekuje i kako treba, o čemu svjedoče i krize bankarskih sistema.

Državni program za osiguranje depozita može da smanji najezdu deponenata na banke, štiteći ih i omogućavajući da oni ponovo ulažu sredstva u bankarski sistem.

Osim osiguranja depozita, vlade su često pomagale domaćim bankama koje zapadnu u probleme, čak i onima koje nemaju osigurane depozite, najčešće na način da Centralna banka odobrava pozajmice problematičnim bankama- „uloga kreditora u krajnjoj instanci“. U drugim slučajevima, problematične banke dobijaju sredstva direktno od vlade ili ih vlada preuzima.

Osnovni principi Bazelskog odbora za uspješnu superviziju bankarstva, potvrdili su da pažljivo kreiran sistem osiguranja depozita može značajno doprinjeti povjerenju javnosti u finansijski sistem i tako ograničiti „zarazu“ od banaka u nevolji, s tim što nije istovremeno ponudio i uputstvo za uspješne sisteme osiguranja depozita. Uvođenje, odnosno reforma sistema za osiguranje depozita uspješnija je ukoliko imamo zdrav bankarski sistem i stabilne institucije u okruženju. Međutim, deponenti su svjesni da neće pretrpjeti nikakve gubitke do iznosa osiguranog depozita, ukoliko banka propadne, te i ne nameću bankama tržišnu disciplinu, odnosno ne povlače sredstva kada posumnjaju da se banka upustila u rizično poslovanje. Sa druge strane, zbog takve sigurnosti banke su motivisane da se upuste u veće rizike.Pošto zaštićeni deponenti nemaju previše razloga da nadgledaju aktivnosti banke, bez uplitanja vlade u bankarski sektor mogu dospjeti i prevaranti koji, za sve loše što učine mogu da dobiju blagu kaznu.

„Previše velik da bi propao“, objašnjava da regulatori banaka nerado dozvoljavaju nekoj velikoj banci da propadne i prouzrokuje svojim deponentima velike gubitke, obzirom da propast velike banke dovodi do velikog finansijskog potresa u zemlji.

U junu 2020. godine donešen je novi Zakon o osiguranju depozita u bankama Bosne i Hercegovine. Osnovni cilj Zakona je da se obezbijedi zaštita depozita fizičkih i pravnih lica u bankama koje su dobile dozvolu za rad nadležne agencije za bankarstvo i na taj način doprinese očuvanju sveukupne finansijske stabilnosti. Takođe, Agencija za osiguranje depozita BiH dobija novi mandat – da sredstvima Fonda za osiguranje depozita, u određenim slučajevima, učestvuje u procesu restruktuiranja banaka. Rok za isplatu deponenata usljed oduzimanja dozvole za rad banci skraćuje se sa 90 na 20 radnih dana.

Maksimalan iznos osiguranog depozita koji trenutno isplaćuje Agencija za osiguranje depozita Bosne i Hercegovine iznosi 50.000 KM (zajedno sa obračunatom kamatom po deponentu po banci članici, umanjen za zakonski ili ugovoreni dug deponenta prema banci).

Bankarski sektor u Republici Srpskoj

Bankarski sistem Republike Srpske obuhvata banke, mikrokreditne organizacije, štedno-kreditne organizacije, davaoce lizinga i druge finansijske organizacije čije se osnivanje i poslovanje uređuje posebnim zakonom.

Bankarski sektor u Republici Srpskoj ima visok stepen pravne i regulatorne uređenosti, a po karakteru prevladava „konzervativno bankarstvo“ sa depozitima kao osnovnim izvorom poslovanja i kreditima kao osnovnim proizvodom. Pod uticajem ekonomske i finansijske nestabilnosti duži period je usporen rast bankarskog sektora, a izloženost prvenstveno kreditnom riziku je povećana.

Bankarski sektor Republike Srpske na dan 30.06.2019. godine čini osam banaka (Tabela 1) sa većinskim privatnim kapitalom, uz dominaciju stranog akcionarskog kapitala kod pet banaka, odnosno sa većinskom učešćem domaćeg akcionarskog kapitala kod dvije banke. Dvije banke imaju državni akcionarski kapital, a učešće državnog akcionarskog kapitala u ukupnom akcionarskom kapitalu banaka u Republici Srpskoj je oko 0,7%.

Struktura vlasništva banaka u Republici Srpskoj data je u sljedećoj tabeli:

Tabela 1: Struktura akcionarskog kapitala sa stanjem na dan 30.06.2021.							(mil. KM)
Red. broj	Banka	Privatni kapital		Državni kapital		Zadružni kapital	
		Iznos	%	Iznos	%	Iznos	%
1.	Nova banka a.d. Banjaluka	184,5	26,8	0,0	0,0	0,1	68,1
2.	NLB banka a.d. Banjaluka	62,0	9,0	0,0	0,0	0,0	0,0
3.	UniCredit Bank a.d. Banjaluka	97,0	14,1	0,0	0,0	0,0	17,4
4.	Sberbank a.d. Banjaluka	62,2	9,0	0,0	0,0	0,0	0,0
5.	Addiko Bank a.d. Banjaluka	153,1	22,2	0,0	0,0	0,0	1,4
6.	MF banka a.d. Banjaluka	51,1	7,4	0,0	0,0	0,0	0,0
7.	Komercijalna banka a.d. Banjaluka	60,0	8,7	0,0	0,0	0,0	0,0
8.	Naša banka a.d. Bijeljina	18,8	2,7	5,0	100,0	0,0	13,0
UKUPNO:		688,7	100	5,0	100	0,2	100

Izvor: ABRS,(2021) "Izvještaj o stanju u bankarskom sistemu Republike Srpske za period 01.01.2021-30.06.2021.",str.21

Iz tabelarnog pregleda uočava se da se ukupni akcionarski kapital u bankarskom sektoru (694 miliona KM) sastoji od privatnog akcionarskog kapitala (99,3%), državnog kapitala (0,7%) i malog učešća zadružnog kapitala.

Privatni strani akcionarski kapital čini 66% ukupnog privatnog akcionarskog kapitala bankarskog sektora Republike Srpske na dan 30.06.2021. godine. Dominantno mjesto imaju akcionari iz Austrije sa učešćem od preko 30%, Italije sa učešćem 15%, te Slovenije, Srbije i ostalih zemalja sa učešćem u ukupnom akcionarskom kapitalu od 20%.

Bilans stanja

Ukupna aktiva bankarskog sektora na 30.06.2021. godine iznosi 10,3 milijardi KM, a čini ju neto aktiva u iznosu od 9.2 milijardi KM i vanbilansna aktiva u iznosu od 1.2 milijardi KM. Bruto krediti bankarskog sektora na 30.06.2021. godine iznose 5.6 milijardi KM i čine 59% ukupne aktive.

Primarni izvor finansiranja bankarskog sektora čine depoziti, te je samim tim obim poslovanja, planiranje i vođenje poslovne politike svake banke u direktnoj zavisnosti od nivoa, strukture i ročnosti depozita. Depoziti bankarskog sektora na 30.06.2021. godine iznose 7.1 milijardi KM i čine 78% ukupne pasive.

Struktura bilansa stanja bankarskog sektora Republike Srpske na dan 30.06.2021. godine data je u sljedećoj tabeli:

Tabela 2: Bilans stanja

Opis	30.06.2021.	
	Iznos (mil. KM)	%
AKTIVA:		
Novčana sredstva	2.371	25
HOV za trgovanje	1.161	12

Plasmani drugim bankama	21	0
Krediti (bruto)	5.605	59
HOV do dospijeća	31	0
Poslovni 117ctive117 i ostala fiksna aktiva	196	2
Ostala aktiva	129	1
UKUPNO:	**9.514**	**100**
Ispravke vrijednosti	364	
Ispravke vrijednosti za stavke kredita	341	
Ispravke vrijednosti za stavke 117ctive bez kredita	23	
NETO AKTIVA:	**9.150**	
Ukupno vanbilans	1162,5	
Aktivni vanbilans	1.085	
Komisioni poslovi	77	
UKUPNO AKTIVA	**10.312**	
PASIVA:		
Depoziti	7.090	78
Uzete pozajmice	0	0
Obaveze po uzetim kreditima	674	7
Subordinisani dugovi	52	1
Ostale obaveze	194	2
Rezerve za stavke vanbilansa	11	0
Kapital	1.128	12
UKUPNO OBAVEZE I KAPITAL	**9.150**	**100**
Ukupno vanbilans	1.163	
Aktivni vanbilans	1.085	
Komisioni poslovi	77	
UKUPNO PASIVA	**10.312**	

Izvor: www.abrs.ba

Bilans stanja bankarskog sektora Republike Srpske baziran je bilansima osam banaka. Stopa promjene neto aktive sa vanbilansom iznosi 6,1% i veća je za 3,1% u odnosu na kraj 2020. godine, što predstavlja pokazatelj pozitivnih kretanja u aktivnostima banaka u uslovima pandemije COVID-19.

Bilans uspjeha

Ukupni prihodi bankarskog sektora sa 30.06.2021. godine iznosili su 240 miliona KM. U strukturi ukupnih prihoda, najznačajnije učešće imaju prihodi od kamata i slični prihodi u iznosu 149 miliona KM, odnosno isti čine 62% ukupnih prihoda. Operativni prihodi čine 38% ukupnih prihoda.

Ukupni rashodi bankarskog sektora u istom periodu iznosili su 171 milion KM. U strukturi ukupnih rashoda bankarskog sektora, najznačajnije učešće imaju operativni rashodi u iznosu 116 miliona KM, odnosno isti čine 67,8% ukupnih rashoda. Rashodi po kamatama i slični rashodi iznosili su 30 miliona KM (17,3%), odnosno poslovni i direktni rashodi iznosili su 26 miliona KM (15% ukupnih rashoda).

Struktura Bilansa uspjeha bankarskog sektora Republike Srpske na 30.06.2021. godine prikazana je u sljedećoj tabeli:

Tabela 3: Bilans uspjeha

(mil. KM)

OPIS	**30.06.2021.**	
	Iznos	**%**
PRIHODI PO KAMATAMA I SL. PRIHODI		
Prihodi od kamata i sl. Prihodi	149	62
Operativni prihodi	92	38
UKUPNI PRIHODI	**241**	**100**
RASHODI		
Rashodi po kamatama i slični rashodi	30	17
Poslovni i direktni rashodi	26	15
Operativni rashodi	116	68
UKUPNI RASHODI	**171**	**100**
UKUPNI PRIHODI-RASHODI	**70**	
DOBIT PRIJE OPOREZIVANJA	**70**	
GUBITAK	**0**	
POREZI	**5**	
Dobit po osnovu poveć.odl.por.sredst.i smanj.odl.por.obaveza	**0**	
Gubitak po osnovu smanj.odl.por.sredst.i poveć.odl.por.obaveza	**1**	
NETO-DOBIT	**64**	
NETO-GUBITAK	**0**	

Izvor: www.abrs.ba

Prema podacima ABRS, u prvih šest mjeseci 2021. godine uočava se rast ukupnih prihoda za 9% i pad ukupnih rashoda za 5% u odnosu na isti period 2020. godine. Odnosno, svih osam banaka u Republici Srpskoj iskazalo je neto dobit u ukupnom iznosu od 64 miliona KM i ista je za 26 miliona (69%) veća u odnosu na isti period 2020. godine. Stopa povrata na kapital je 12,1% i veća je za 4,8%, a stopa povrata na aktivu je 1,5% i predstavlja povećanje za 0,6% u odnosu na prvih šest mjeseci 2020. godine.

Mreža finansijske sigurnosti

Mreža finansijske sigurnosti može ograničiti rizik koji banke preuzimaju, smanjiti šanse za insolventnost ili nelikvidnost, kao i stabilizovati strah privatnog sektora zbog dešavanja vezanih za propadanje pojedinih banaka (npr. Bobar banka, Banka Srpske i dr.).

Značaj banaka unutar svake ekonomije uzrokuje potrebu za strogom regulacijom bankarskog sektora, kao i za uspostavljanjem mreže finansijske sigurnosti koju u jednoj državi u najužem smislu čine:

- Centralna banka, koja najčešće ima ulogu „kreditora u krajnjoj instanci“,
- bankarska regulativa i supervizija i
- osiguranje depozita.

Sigurnosna mreža ima četiri osnovna cilja:

1. Regulativa i supervizija banaka uspostavljeni su kako bi se osiguralo da banke posluju na siguran i ispravan način. Regulativa daje smjernice za prihvatljivo preuzimanje rizika, a supervizija osigurava da se propisi poštuju.
2. Bankarski sektor mora u krajnjoj nuždi imati pristup utočištu. Neočekivani manjak likvidnosti može izazvati pad banaka i kolaps finansijskog sistema.
3. Mehanizmi za rješavanje pada finansijskih institucija obezbjeđuju da se propale banke uklone brzo, prije nego se finansijske teškoće prošire i na druge institucije.
4. Sigurnosna mreža obezbjeđuje zaštitu deponenata i to prvenstveno malih i relativno ranjivih štediša.

Nivo pokrića je svakako važna karakteristika sigurnosne mreže koja podržava privatne deponente. Ako je postavljen prenisko, relativno mali deponenti mogu se suočiti sa neizvjesnošću u vezi banke u kojoj drže depozite. Ukoliko je nivo pokrića suviše visok, veliki sofisticirani deponenti neće nametati tržišnu disciplinu i banke se mogu izložiti poslovanju sa većim stepenom rizika. U oba slučaja, snažna supervizija i efikasan okvir za rezoluciju banaka mogu ublažiti neke od negativnih posljedica neadekvatno određenog nivoa pokrića.

Efikasan sistem sigurnosne mreže podrazumijeva olakšice deponentima prilikom ispunjavanja svojih obaveza, uključujući isplatu deponenta brzo, tačno i na pravičnoj osnovi, uz smanjenje troškova poremećaja na tržištu, maksimiziranje naplate iz aktive, te pojačanu disciplinu kroz pravne okvire i akcije u slučaju nemara ili drugih pogrešnih aktivnosti. Učesnici u mreži sigurnosti finansijskog sistema trebali bi imati ovlaštenja da uspostave fleksibilne mehanizme za očuvanje kritične funkcije bankarstva.

Currency board aranžman daje CBBiH ograničen prostor da manevriše u slučaju bankarske krize. CBBiH bi trebala povećati svoju nadležnost monitoringa, i efikasno se uvezati sa drugim agencijama, posebno Agencijama za bankarstvo.

Mrežu finansijske sigurnosti, dakle, čine institucije koje imaju ovlaštenja i odgovornosti da regulišu i nadgledaju poslovanje banaka, te da intervenišu kada je neophodno zaštititi deponente i očuvati finansijsku stabilnost.

U situaciji kada dolazi do sistemskih kriza, kao podrška mreži finansijske sigurnosti uključuje se vlada države. Povlačenje depozita u toku bankarske panike, smanjenje kreditnih aktivnosti usljed povlačenja depozita, kao i mogućnost propasti banaka podstiču svaku državu na stvaranje adekvatne mreže finansijske sigurnosti. Iz tog razloga mreža finansijske sigurnosti treba da bude postavljena na način koji će obezbjediti opreznu regulatornu politiku i obeshrabriti neželjeno povlačenje depozita. Podjela ovlaštenja, moći i odgovornosti između učesnica u finansijskoj sigurnosnoj mreži stvar je izbora javne politike i uslova u pojedinim zemljama.

Trendovi u kretanju prikupljenih depozita

Depoziti banaka (78% ukupne pasive) čine primarni izvor finansiranja bankarskog sektora Republike Srpske. Planiranje, obim i vođenje poslovne politike svake banke u direktnoj je zavisnosti od nivoa, strukture i ročnosti depozita. Na 30.06.2021. godine, ukupno prikupljeni depoziti bankarskog sektora Republike Srpske iznose 7 milijardi KM i veći su za 11% u odnosu na isti period 2020., odnosno 15% 2019. godine. Depoziti u konvertibilnim markama (68%) bilježe rast u odnosu na depozite u stranoj valuti.

Pregled sektorske strukture ukupno prikupljenih depozita banaka Republike Srpske u posmatranom periodu dat je u sljedećoj tabeli:

Tabela 4: Sektorska struktura ukupno prikupljenih depozita

(mil. KM)

OPIS	30.06.2019.		30.06.2020.		30.06.2021.	
	Iznos	%	Iznos	%	Iznos	%
Vlada i vladine institucije	643,8	10,5	722,4	11,4	1033,1	14,6
Javna i državna preduzeća	248,0	4,1	286,5	4,5	359,0	5,1
Privatna preduzeća i društva	813,4	13,3	847,6	13,4	1035,7	14,6
Neprofitne organizacije	99,7	1,6	112,0	1,8	116,6	1,6
Banke i bankarske institucije	333,8	5,5	423,3	6,7	171,8	2,4
Nebankarske fin. Institucije	345,1	5,6	247,6	3,9	299,8	4,2
Građani	3551,7	58,0	3.671,9	58,0	4049,2	57,1

Ostalo	84,8	1,4	18,3	0,3	24,6	0,3
UKUPNO	**6.120**	**100**	**6.330**	**100**	**7.090**	**100**

Izvor: www.abrs.ba

Iz tabelarnog pregleda se uočava da najveći rast imaju depoziti vlade i vladinih institucija od 310,7 miliona KM (43%), građana od 377,3 miliona KM (10%), privatnih preduzeća i društava veći su za 188,1 milion KM (22%), u odnosu na isti period 2020. godine.

Pad depozita evidentiran je samo kod banaka i bankarskih institucija i to za 251,5 milion KM (60%).

Rast depozita stanovništva najvećim dijelom je rezultat povjerenja u institut osiguranja depozita i straha od bilo kakvog investiranja. Agencija za osiguranje depozita je u ranijem periodu, periodu insolventnosti i likvidacije banaka djelovala besprijekorno, te bi ukoliko bi došla u situaciju da zataji neminovno dovela do kolapsa bankarskog sistema.

Depozitni osnov, prvenstveno građana (57,1%), sasvim je dovoljan za postojeći nivo kreditnih aktivnosti banaka. Međutim, ročna struktura depozita građana nepovoljna je sa stanovišta mogućnosti dugoročnog kreditiranja.

Pregled ročne strukture ukupno prikupljenih depozita banaka Republike Srpske dat je u sljedećoj tabeli:

Tabela 5: Ročna struktura ukupno prikupljenih depozita

(mil. KM)

OPIS	30.06.2019.		30.06.2020.		30.06.2021.	
	Iznos	**%**	**Iznos**	**%**	**Iznos**	**%**
Štednja i depoziti po viđenju	3.354,5	54,8	3.595,8	56,8	4.499	64
Do 3 mjeseca	80,3	1,3	45,2	0,7	8	0
Do 1 godine	445,9	7,3	364,0	5,8	203	3
1. Ukupno kratkoročni depoziti	**3.881**	**63**	**4.005**	**63**	**4.711**	**67**
Do 3 godine	1.929,7	31,5	2.003,4	31,7	2.074	29
Preko 3 godine	310,1	5,1	321,2	5,1	305	4
2. Ukupno dugoročni depoziti	**2.240**	**37**	**2.325**	**37**	**2.379**	**34**
Ukupno depoziti	**6.120**	**100**	**6.330**	**100**	**7.090**	**100**

Izvor: www.abrs.ba

Pregled pokazuje da su kratkoročni depoziti imali rast u iznosu od 706 miliona KM (18%), a dugoročni depoziti su veći za 54 miliona (1%) u odnosu na isti period 2020. godine. Odnosno kratkoročni depoziti bilježe rast od 21%, a dugoročni 6% u odnosu na isti period 2019. godine.

Kod kratkoročnih depozita zabilježen je rast štednje i depozita po viđenju za 903 miliona KM (25%), pad kratkoročne štednje do 3 mjeseca za 37,2 miliona KM i do 1 godine za 161 milion KM u odnosu na isti period 2020. godine.

Kod dugoročnih depozita, depoziti do 3 godine bilježe rast za 70 miliona KM (3,5%) u odnosu na isti period 2020., odnosno 145 miliona KM (8%) u odnosu na isti period 2019. godine.

Depoziti preko 3 godine manji su za 16 miliona KM (5%) u odnosu na isti period 2020. godine., odnosno za 5 miliona KM (2%) u odnosu na isti period 2019. godine.

Obzirom da se odluka o visini osiguranog depozita donosi na nivou Upravnog odbora Agencije za osiguranje depozita Bosne i Hercegovine, obezbjeđena je mogućnost brzog reagovanja u cilju ispunjavanja ciljeva javne politike, odnosno obezbjeđuje se zaštita štediša i održanje stabilnosti finansijskog sistema. Međutim, sa druge strane postoji potreba detaljne analize koja treba da podrži donešene odluke, pri čemu se moraju uzeti u obzir elementi kao što su nivo privrednog razvoja Bosne i Hercegovine (jedna od odrednica može da bude i veličina društvenog bruto proizvoda po glavi stanovnika), kvalitet bankarskog sektora Bosne i Hercegovine, nivo Fonda za osiguranje depozita, nivo pokrivenosti depozita osiguranjem u zemljama u okruženju, kao i odredbe Direktive Evropske Unije o osiguranju depozita.

Trendovi u kretanju kreditnih plasmana

Iznos plasiranih kredita najvažniji je pokazatelj obima poslovanja svake banke i sektora u cjelini s jedne strane, ali istovremeno i najveći potencijalni generator rizika u poslovanju, s druge. Bruto krediti na dan 30.06.2021. godine čine 59% bruto bilansne aktive.

Pregled sektorske strukture kredita banaka Republike Srpske dat je u sljedećoj tabeli:

Tabela 6: Sektorska struktura ukupnih kredita (mil. KM)

OPIS	30.06.2019.		30.06.2020.		30.06.2021.	
	Iznos	%	Iznos	%	Iznos	%
Vlada i vladine institucije	555,2	10,8	688,5	12,7	656,3	11,7
Javna i državna preduzeća	221,6	4,3	237,1	4,4	235,2	4,2
Privatna preduzeća i društva	1890,8	36,8	1.922,2	35,4	1952,8	34,8
Neprofitne organizacije	8,5	0,2	8,7	0,2	6,2	0,1
Banke i bankarske institucije	0,0	0,0	0,0	0,0	0,0	0,0

Nebankarske fin. institucije	47,7	0,9	61,7	1,1	47,3	0,8
Građani	2406,4	46,8	2.502,1	46,1	2698,5	48,1
Ostalo	11,6	0,2	10,5	0,2	9,0	0,2
UKUPNO	**5.142**	**100**	**5.431**	**100**	**5.605**	**100**

Izvor: www.abrs.ba

Pregled pokazuje da je iznos ukupnih kredita u posmatranom periodu za 174 miliona (3%) veći u odnosu na isti period 2020. godine, odnosno veći za 463 miliona (9%) u odnosu na 2019. godinu.

Usljed nastanka vanredne situacije izazvane pandemijom COVID-19, ABRS je odlukama o privremenim mjerama za ublažavanje negativnih ekonomskih posljedica omogućila bankama da ponude klijentima koji su pogođeni negativnim efektima, moratorijum za otplatu nastalih obaveza, grejs period i dr. Prema izvještaju ABRS, krediti po kojima su odobrene mjere čine 16% portfolija sa 30.06.2021. godine. Banke su, u skladu sa Odlukom o upravljanju kreditnim rizikom i utvrđivanju očekivanih kreditnih gubitaka, u prvih šest mjeseci 2021. godine izvršile računovodstveni otpis kreditnih potraživanja u iznosu 24 miliona KM i trajni otpis u iznosu 5 miliona KM.

Kad posmatramo sektorsku strukturu plasiranih kredita banaka Republike Srpske, najzastupljeniji su krediti plasirani građanima (48%) i privatnim preduzećima i društvima (35%), Vladi i vladinim institucijama (12%) i dr. Kod kredita plasiranih građanima zabilježen je rast od 8%, a kod kredita datih privatnim preduzećima i društvima za 2% u odnosu na isti period 2020. godine, dok se kod svih ostalih sektora bilježi pad kreditnih aktivnosti. Krediti dati vladi i vladinim institucijama manji su za 4%, odnosno javnim i državnim preduzećima za 1% u odnosu na isti period 2020. godine.

Mjere Vlade Republike Srpske za ublažavanje negativnih efekata pandemije, restriktivne mjere u cilju njenog suzbijanja, podrška privredi i dr. uticali su na rast privredne aktivnosti u Republici Srpskoj. Npr. u prvom tromjesečju 2021. godine evidentiran je rast privredne aktivnosti od 2,3% u odnosu na isti period 2020. godine.

Međutim, stagnacija kredita bankarskog sektora ukazuje na izostanak podrške realnom sektoru. Problemi bankarskog i realnog sektora međusobno su uslovljeni, odnosno bankarski sektor zahtijeva visoke kamatne stope na kredite, međutim realni sektor kredite sa visokim kamatnim stopama ne može da prihvati. Problem neusklađenosti u snižavanju aktivnih i pasivnih kamatnih stopa, odnosno značajan pad pasivnih i stagniranje aktivnih kamatnih stopa doprinosi tekućoj rentabilnosti, ali i „žrtvovanju budućnosti“. Obaranje aktivnih kamatnih stopa je preduslov da realni sektor pokaže veći interes za kredite i na taj način obezbijedi bankama izlaz iz stagnacije i značajniji doprinos privrednom i ekonomskom razvoju Republike Srpske.

Posmatrajući ročnu strukturu kredita na 30.06.2021. godine, uočava se da su kratkoročni krediti veći za 15 miliona KM (2%), odnosno dugoročni krediti za 196 miliona KM (4%) u odnosu na isti period 2020. godine. Dospjela potraživanja bilježe smanjenje 36 miliona KM (15%) u odnosu na isti period 2020. godine.

Pregled ročne strukture kredita banaka Republike Srpske dat je u sljedećoj tabeli:

Tabela 7: Ročna struktura ukupnih kredita

(mil. KM)

OPIS	30.06.2019.			30.06.2020.			30.06.2021.		
	< 1 god.	**> 1 god.**	**Dospjela potraž.**	**< 1 god.**	**> 1 god.**	**Dospjela potraž.**	**< 1 god.**	**> 1 god.**	**Dospjela potraž.**
Vlada i vladine institucije	2,9	550,2	2,2	4,7	682,1	1,7	5,3	650,2	0,8
Javna i državna preduzeća	13,8	204,0	3,9	7,5	228,4	1,2	15,8	216,5	2,9
Privatna preduzeća i društva	508,8	1.152,2	229,9	589,4	1.185,1	147,7	592,4	1.243,1	117,3
Neprofitne organizacije	2,6	2,8	3,1	1,3	6,6	0,8	0,7	5,4	0,1
Banke i bankarske institucije	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
Nebankarske fin. institucije	6,1	41,0	0,5	3,0	58,2	0,5	0,9	45,9	0,4
Građani	169,2	2.113,5	123,7	169,2	2.254,1	78,8	175,5	2.450,1	72,9
Ostalo	0	11	0	0	10	0	0,4	8,5	0,1
UKUPNO	**704**	**4.075**	**363**	**776**	**4.424**	**231**	**791**	**4.620**	**195**

Izvor: www.abrs.ba

U ročnoj strukturi kredita prevladava dugoročno kreditiranje i isto u posmatranom periodu bilježi trend rasta.

Sa 30.06.2021. godine dugoročni plasmani iznosili su 4.6 milijardi KM i učestvovali su sa 82% u ukupnom kreditnom plasmanu.

Najveće učešće u strukturi dugoročnih kredita imaju krediti građanima u iznosu 2.4 milijarde KM (53%) i isti pokazuju trend rasta u posmatranom periodu.

Dugoročni krediti privatnim preduzećima i društvima u iznosu 1.2 milijarde KM, učestvuju sa 27% u ukupnim dugoročnim kreditima na kraju juna 2021. godine i veći su za 5% u odnosu na isti period 2020. godine.

U strukturi kratkoročnih kredita, najznačajnije učešće imaju krediti privatnim preduzećima i društvima, u iznosu 592,4 miliona KM (75%) sa trendom rasta u posmatranom periodu.

Kratkoročni krediti građanima u ukupnim kratkoročnim kreditima učestvuju sa 22% i pokazuju blagi trend rasta u posmatranom periodu.

Dospjela potraživanja kod kredita privatnim preduzećima i društvima i dospjela potraživanja kod kredita datih građanima na 30.06.2021. godine čine 98% ukupnih dospjelih potraživanja. Stopa dospjelih kredita u odnosu na ukupne kredite iznosi 3,5% i manja je u odnosu na isti period 2020. godine (4,3%), odnosno isti period 2019. godine (7%). Na smanjenje dospjelih potraživanja uticala je primjena nove Odluke ABRS o upravljanju kreditnim rizikom i utvrđivanju očekivanih kreditnih gubitaka kojom je propisan računovodstveni otpis dospjelih kredita, kvalitetnije upravljanje kreditnim rizikom i dr.

Stopa dospjelih kredita privatnim preduzećima i društvima u odnosu na ukupne kredite date privatnim preduzećima i društvima iznosi 6%, a stopa dospjelih kredita građana u odnosu na ukupne kredite građanima iznosi 2,7%.

Ukupno prikupljeni depoziti i plasirani krediti u Republici Srpskoj

Ukupni depoziti na teritoriji Republike Srpske u posmatranom periodu bilježe rast od 11% u odnosu na isti period 2020. godine, odnosno 2019. godine, a iznos plasiranih kredita je za 4% veći u odnosu na 30.06.2020. godine, odnosno za 10% u odnosu na isti period 2019. godine.

Uporedni pregled prikupljenih depozita i plasiranih kredita na teritoriji Republike Srpske dat je u sljedećoj tabeli:

Tabela 8: Prikupljeni depoziti i plasirani krediti (mil. KM)

OPIS	30.06.2019.		30.06.2020.		30.06.2021.	
	Iznos depozita	**Iznos kredita**	**Iznos depozita**	**Iznos kredita**	**Iznos depozita**	**Iznos kredita**
Banke RS	6.120,4	5.141,8	6.329,6	5.430,7	7.089,9	5.605,2
Poslovne jedinice banaka FBiH	911,4	1.469,8	959,2	1.540,8	1.075,4	1.636,9
UKUPNO:	7.031,9	6.611,6	7.288,8	6.971,5	8.165,3	7.242,1

Minus: Poslovne jed. Banaka RS u FBiH	329,8	244,7	332,5	274,7	432,6	270,6
UKUPNO	**6.702**	**6.367**	**6.956**	**6.697**	**7.733**	**6.972**

Izvor: *www.abrs.ba*

Organizacione jedinice banaka sa sjedištem u Republici Srpskoj, koje obavljaju aktivnosti na teritoriji Federacije BiH, bilježe rast depozita od 30% i pad kredita od 2% na dan 30.06.2021. godine u odnosu na isti period 2020. godine, odnosno rast depozita od 30% i rast kredita od 10% u odnosu na isti period 2019. godine.

Poslovne jedinice banaka koje imaju sjedište u Federaciji BiH, a obavljaju aktivnosti u Republici Srpskoj bilježe rast depozita od 12% i rast kredita od 6% u odnosu na isti period 2020. godine, odnosno rast depozita od 18% i kredita od 11% u odnosu na isti period 2019. godine.

Supervizija banaka u Evropi i svijetu

Bankarski sistem u SAD vezuje se za osnivanje Federalnog rezervnog sistema (1913. godine) koji predstavlja centralnu banku i koji u svom sastavu ima dvanaest federalnih rezervnih banaka. Federalni rezervni sistem, pored obavljanja supervizije i kontrole poslovanja banaka članica, predlaže i sprovodi monetarnu politiku, obavlja transakcije za banke članice sistema, poslove za vladu SAD, te emituje novčanice i kovani novac.

Bankarski sistem Engleske datira od 1694. godine formiranjem Bank of England čiji je zadatak prvenstveno koncentracija kapitala i specijalizacija bankarskog poslovanja. Centralna banka Engleske sastoji se od bankarskog sektora (Banking department) koji se bavi aktivnim i pasivnim bankarskim poslovima i emisionog sektora (Issue department) koji se bavi izdavanjem novčanica.

Bankarski sistem Njemačke institucionalizovan je donošenjem Zakona 1885. godine. Centralna banka Njemačke predstavlja banku prvog stepena, čiji su zadaci emitovanje novca, određivanje eskontne politike, politike monetarnih rezervi, kreditne politike, finansijskih i blagajničkih poslova za centralnu vladu. Njemački bankarski sistem ima federalnih jedinica koliko i distrihta – 11.

Jedan je od najrazvijenijih bankarskih sistema u svijetu je bankarski sistem Švajcarske, u kojem Centralna banka Švajcarske nije državna ustanova, nego mješovita privredna institucija sa većinskim vlasništvom kantona. Kantonalne banke (28 banaka), pretežno se bave hipotekarnim poslovima, predstavljaju državne institucije koje su raspoređene po kantonima.

Bankarski sistem Japana karakterističan je prvenstveno po velikom broju bankarskih institucija (oko 9000), sa međusobno razvijenim finansijskim odnosima i čvrsto uspostavljenom vezom sa finansijskim vlastima. Japanska banka predstavlja Centralnu banku Japana koja obavlja poslove kreditne kontrole, emisione poslove i poslove iz domena monetarne politike, a organizovana je kao jedinstvena institucija sa tridesetak filijala u Japanu i sa filijalama u Londonu i Njujorku. Sa 55% kapitala država je većinski vlasnik kapitala odnosno privatni kapital prisutan je sa 45%. Centralnu banku Japana karakteriše sužena autonomija jer njene odluke može ograničiti ili suspendovati vlada Japana.

Ulogu centralne banke u Srbiji vrši Narodna banka Srbije koja je za svoj rad odgovorna Narodnoj skupštini Republike Srbije. Neke od nadležnosti Narodne banke su: utvrđivanje monetarne politike, regulisanje količine novca u opticaju, regulisanje likvidnosti banaka i drugih finansijskih organizacija, regulisanje aktivnosti u plaćanjima sa inostranstvom, izdavanje novčanica i kovanog novca i dr. Narodna banka Srbije je samostalna i nezavisna u obavljanju aktivnosti.

Supervizija banaka u Evropskoj uniji

Koncept Evropske bankarske unije podrazumijeva da se u okviru Evropske unije ustanovi centralna i zajednička odgovornost za finansijski nadzor, osiguranje depozita i sanaciju i poravnanje kreditnih instituta. Ovaj koncept bi trebao omogućiti zemljama evrozone, ali i zemljama koje se žele priključiti evrozoni, da objedine tri međusobno povezana i komplementarna podsistema:

- ✓ jedinstven nadzorni mehanizam,
- ✓ jedinstven mehanizam restruktuiranja i
- ✓ evropski sistem osiguranja depozita.

Jedinstvena i obavezujuća pravila za sve članice Evropske unije predstavljaju sveobuhvatan regulatorni okvir za funkcionisanje evropskog tržišta finansijskih usluga u cilju uređenja bankarskog sistema.

Kako bi se povećali efikasnost, efektivnost, tržišna disciplina i transparentnost banaka, utvrđena su sljedeća zajednička pravila:

- ➢ pravila vezana za kapitalne zahtjeve,
- ➢ okvir za intervenciju u banci suočenoj sa poteškoćama i likvidacijom i
- ➢ pravila osiguranja depozita.

Obzirom da je cilj Bosne i Hercegovine aplikacija za članstvo u Evropskoj uniji, ABRS je opredjeljena da u periodu tranzicije usmjeri aktivnosti na usaglašavanje regulatornog okvira sa okvirom Evropske unije. Posljedice globalne finansijske krize otkrile su značajne nedostatke u supervizorskim i regulatornim okvirima koji se primjenjuju u BiH, uključujući i nedostatak supervizorske kontrole nad prekomjernim i oslabljenim aktivnostima kreditiranja od strane banaka.

Projekat Evropske bankarske unije osmišljen je kao jedan od ključnih faktora za vraćanje povjerenja u finansijski sektor nakon svjetske finansijske krize i prevenciju budućih finansijskih potresa, koja podrazumijeva centralizaciju odlučivanja na nivou Evropske unije. Strategijom za uvođenje Bazela III, ABRS je predvidjela izmjene koje se odnose unapređenje u oblasti korporativnog upravljanja u bankama i uvođenje novih minimalnih standarda za upravljanje rizikom, uvođenje novih standarda kapitala, unapređenje kvaliteta kapitala, jačanje kapitalnih zahtjeva, uvođenje zaštitnih slojeva kapitala i finansijske poluge i dr. Takođe, predviđen je između ostalog i oprezan, postepen prelazak na novi regulatorni okvir kako bi se osiguralo da ABRS razvije i vlastite supervizorske kapacitete za kreiranje i provođenje novog regulatornog okvira, a u saradnji sa svim relevantnim domaćim i stranim institucijama (ABRS, 2016. godina).

ABRS je u obavezi da efikasno procjenjuje adekvatnost upravljanja rizicima i kapitalom od strane banaka, te da kontinuirano unapređuje regulativu iz oblasti supervizije banaka u cilju očuvanja, kontrole i jačanja stabilnosti bankarskog sistema Republike Srpske.

Evropska Komisija je u oktobru 2021. godine objavila Odluku kojom je potvrdila ekvivalenciju nadzornog i regulatornog okvira u Bosni i Hercegovini u odnosu na uredbe i direktivu Evropskog parlamenta i Vijeća o bonitetnim zahtjevima za kreditne institucije i investiciona društva, odnosno o pristupanju djelatnosti kreditnih institucijai bonitetnom nadzoru nad kreditnim institucijama i investicionim društvima. Odluka Evropske Komisije predstavlja dostizanje strateškog cilja ABRS i ima veliku važnost za Republiku Srpsku, Bosnu i Hercegovinu, bankarski sistem, ekonomiju i građane.

Zaključak

Svrha supervizije bankarskog sektora, odnosno bankarskog sistema je prvenstveno zaštita deponenata, investitora i akcionara finansijskih institucija od različitih vrsta rizika, te samim tim i smanjenje njihovih gubitaka. Uzimajući u obzir rezultate ostvarene u poslovanju banaka i drugih finansijskih institucija sa krajem juna 2021. godine, može se zaključiti da je u Republici Srpskoj bankarski sistem u cjelini zadržao stabilnost. Ukupne depozitne i kreditne aktivnosti bilježe rast na kraju posmatranog perioda i pored izazova sa kojima je bankarski sektor bio suočen usljed pandemije COVID-19. Kontinuiran rast depozita realnog sektora govori o kontinuiranom jačanju istog, a rast depozita stanovništva najvećim dijelom rezultat je povjerenja u institut osiguranja depozita i straha od bilo kakvog investiranja. Kreditni rast bankarskog sektora Republike Srpske najznačajnijim dijelom vezan je za rast kredita građana, dok kreditiranje privatnih preduzeća i društava koji predstavljaju potencijalno značajne nosioce privrednog i ekonomskog rasta od strane banaka je veoma malo, te ukazuje na nedovoljnu zainteresovanost bankarskog sektora za ulaganje u privredne aktivnosti Republike Srpske.Trend smanjenja depozita bankarskih institucija iz inostranstva, ukazuje na to da strani investitori nemaju interes za ulaganja u Republiku Srpsku. Depozitna osnova domaćih lica, prije svega građana, sasvim je dovoljna za postojeći nivo kreditnih aktivnosti banaka. Međutim, ročna struktura depozita građana ne ide u prilog dugoročnom kreditiranju, čime se značajno smanjuje i mogućnost značajnijeg doprinosa banaka privrednom i ekonomskom razvoju države.

Problem neusklađenosti u visini aktivnih i pasivnih kamatnih stopa, odnosno niske pasivne i stagniranje aktivnih kamatnih stopa doprinosi tekućoj rentabilnosti, ali i „žrtvovanju budućnosti“. Smanjenje aktivnih kamatnih stopa je preduslov da realni sektor pokaže veći interes za kredite i na taj način obezbijedi bankama izlaz iz stagnacije i značajniji doprinos privrednom i ekonomskom razvoju Republike Srpske.

ABRS treba da usmjeri aktivnosti i mjere kako bi se povećale ukupne kreditne aktivnosti, primarno kroz podršku privredi, kontinuiran nadzor banaka - prvenstveno banaka od sistemskog značaja jer je u istim koncentrisan najznačajniji dio štednje i drugih depozita, kapitalnom jačanju prvenstveno banaka koje bilježe natprosječan rast aktive i smanjenje koeficijenta adekvatnosti kapitala. Takođe, potrebno je unaprijediti aktivnosti na projektu "Stres testova" banaka, kao i pojačati nadzor kreditnog rizika, kvaliteta aktive itd.

Bankarska regulativa treba da podrži poslovanje banaka zasnovano na sigurnim i stabilnim osnovama.

Za efikasnu regulatornu disciplinu neophodna je saradnja svih učesnika mreže finansijske sigurnosti.

Efikasan proces rješavanja problematičnih banaka treba da obezbijedi kontinuitet u obavljanju bankarskih poslova, zaštitu osiguranih depozita, lociranje gubitaka ka akcionarima i neosiguranim kreditorima, neoslanjanje na javni novac, minimiziranje troškova rješavanja problematičnih banaka, zatvaranje neodrživih banaka, kredibilitet procesa rješavanja, te jačanje tržišne discipline.

Takođe, efikasan proces rješavanja problematičnih banaka podrazumjeva i da proces rješavanja problematičnih banaka bude takav da se u što je moguće kraćem roku donese odluka da li je neka banka sposobna da nastavi vlastito poslovanje ili, ukoliko to nije slučaj, da se što prije isključi iz sistema kako bi se vrijednost supstance (aktive) zadržala u što većem iznosu.

Brze korektivne supervizorske mjere podrazumjevaju upućivanje zahtjeva direktno prema bankama, njihovim menadžerima i samim vlasnicima banaka, da se zabrani isplata bonusa menadžmentu banke, ili zahtjeva njihova smjena sa menadžerskih pozicija. Supervizori su u mogućnosti da kroz različite mjere i postavljene zahtjeve direktno utiču na samu banku, a naročito na: održavanje visoke stope adekvatnosti kapitala i pozicije likvidnosti, zahtjeve za poboljšanjem sistema interne kontrole, mjere restrikcije u smislu nedozvoljavanja prekomjernog rasta bančinih bilansa, širenja poslovne mreže, i sl.

Ako proces rješavanja problematičnih banaka traje duži vremenski period, može da dođe do daljeg „topljenja“ aktive banaka, nemogućnosti naplate Fonda za osiguranje depozita za prethodno isplaćene osigurane depozite, a time i do moguće destabilizacije cjelokupnog finansijskog sistema.

Efikasan supervizor će preduzeti aktivnosti i mjere koje će da podstaknu korporativno rukovođenje i adekvatno upravljanje rizicima banaka kroz propisane standarde i procedure koje predstavljaju pravce djelovanja menadžera u bankama, adekvatne interne kontrole i revizije, upravljanje rizicima, procjenjivanje bankarske tržišne pozicije, praćenje realizacije definisanih ciljeva, kao i upravljanje kapitalom i likvidnošću.

Naravno, značajnu ulogu u održavanju pozitivnih kretanja u bankarskom sektoru ima okruženje i to prije svega privredni ambijent, sudstvo i zakonodavstvo.

Pred bankarskim sektorom Republike Srpske je budućnost koja će sasvim sigurno biti neizvjesna, ali ono što je svakako izvjesno je da će supervizija banaka i dalje diktirati tempo i uspješnost razvoja i poslovanja bankarskog sektora, odnosno imati veoma važnu ulogu u njegovom daljem napretku i razvoju.

Bankarski sektor Republike Srpske, posmatrano u cjelini, pokazao je stabilnost usljed vanredne situacije izazvane pandemijom COVID-19, iako prolazi kroz određeni period stagnacije.

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THE ROLE OF THE SUPERVISOR PRESERVATION AND STRENGTHENING OF THE BANKING SECTOR OF REPUBLIKA SRPSKA

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Review paper

Abstract

Banking sector represents component of the banking system and the overall economy of the state, which a has a significant impact on the general economic environment in which all business and financial activities of economic entities are carried out, as well as all economic events that are important for the national economy. Commercial banks are facing, on the one hand, according to the management structure of the bank, and on the other hand to the state control institutions. The regulator of the banking sector, through defined instruments and legislation, strives to preserve and strengthen the stability of the banking sector, and to improve its safe, high-quality and legal operations.

Absence of regulation, inadequate regulation and inadequate capacity of regulatory bodies and how they affected the situation in the banking sector as we recognize it today, i.e. in the period after the last economic crisis. State is Additionally heavy sorrow pandemic COVID -19 which is in short period caused fall economic and society activities, which are the birth of women in 2020 the first half of 2021. An attempt will be made to reduce the consequences by introducing a new, more comprehensive regulation, with uncertainty as to whether the regulatory body will be able to prevent the deepening of the crisis in the banking sector through preventive action.

The Banking Agency of the Republika Srpska supervises the functioning of the banking sector Republika Srpska, as well as the general banking environment in which it is located system. The aim of the work is to analyze the impact of the crisis caused by the pandemic COVID -19 on banking sector Republic Srpska, that through quantitative indicators - the amount of total deposits/savings on the one hand, and bank placements and the quality of assets from the point of view of credit losses in the period 30.06. 2 019-30.06.2021. years, on the other. The results show that in the observed period, there is an evident increase in deposits,

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but also an increase in credit activities in the banking sector of the Republic of Srpska. The conclusion of the research indicates that the crisis caused by the COVID-19 pandemic did not shake confidence in the banking sector, i.e. that the changes were not so significant that they could have a decisive impact on the movements of the analyzed financial indicators during the pandemic period.

The work is structured in such a way as to include both theoretical principles and concrete empirical research on the influence of supervision on strengthening the stability of the banking system.

***Keywords**: supervisor, insured deposit, financial stability, COVID-19*

JEL: E52, E59.

Introduction

A crisis caused by a pandemic COVID -19, which appeared at the beginning of 2020, significantly affected not only people's health, but also economies and societies around the world. Lockdown, restrictions and bans on movement, changes in the way of work, reduction of overall social and economic activity have led to major changes in the consumption of the population. The most significant changes are observed in the reduction of consumption in the sectors of tourism, catering and transport, that is, in the increase of consumption in the sectors of the food industry and household goods.

Creating an economic and financial environment in which m will the financial and banking activities of a country take place, especially in conditions of a pandemic COVID -19 is not a simple task at all. Given that -economic relations are more complex in the conditions of a pandemic, the state must be more careful in defining and implementing all strategies that direct the state's economic activity.

In order to respond to difficult business conditions, it is necessary to undertake a series of measures in the banking sector. The banking sector in Republika Srpska consists of 8 banks, with total assets of 10.3 billion KM and about 3,000 employees. The state should make sure to create adequate regulation of the banking sector, which, in addition to other prerequisites for successful business, is one of the foundations of a stable economic system of the state. Supervision has a very significant role in the financial sector, because depending on the tools it applies and the influence it has, it determines the environment in which the business activity of each individual participant will be carried out, that is, the general stability of the financial sector.

Today, countries create their supervision mostly in imitation of more successful developed countries, trying to make maximum use of proven strategies. The supervision of banks creates a general environment that gives all banks equal opportunities, and it depends on the bank itself whether and to what extent it will take advantage of that opportunity.

In practice, regularities can be identified with regard to certain items in the bank's operations. That is, by analyzing a series of available indicators that show the level of development, the success of the bank's operations and the potential for its further development can be determined. Based on the analysis of business results, the position of the bank in the market can be predicted in comparison with competing banks.

Analysis of the interdependence of supervision and bank operations is very significant. It is important to determine regularities in the behavior of banks, as well as to examine the influence of external factors on the use of banks' internal advantages. In essence, the supervision of banks should enable a competitive environment, a market that will be regulated and directed to the growth and development of each of its participants. Given that even greater uncertainties in business and risks are expected in the years ahead, every country must as soon as possible create its own stable economic system, stable political and social environment that will provide incentives for further growth and development of the country.

The main goal of the work is to determine in the supervisor's log the preservation and strengthening of the banking sector in the territory of the Republic of Srpska.

Republika Srpska Banking Agency (hereinafter: ABRS) represents the supervisor in the functioning of the banking sector, that is, the general environment in which the financial sector in the Republic of Srpska is located. Status, organization, financing, competences and work of ABRS as well as dream goal - preserving and strengthening the stability of the banking system while improving its safe, quality and legal operations, are prescribed by the Law on the Banking Agency of the Republic of Srpska.

The subject of the paper is the impact of ABRS on the banking sector, with an emphasis on developments in the following areas: the amount of total deposits/savings on the one hand, and the impact on bank placements and asset quality from the point of view of credit losses in the period 06.30.2019-06.30.2021. years, on the other.

The paper is structured in such a way as to include theoretical principles and concrete empirical research on the importance of supervision in strengthening the stability of the banking system. The aim of the work is to get a clearer picture and a better understanding of the stability of the banking sector, as well as trust in banks in the conditions of a pandemic. The final goal of the paper is to point out the advantages and disadvantages of supervision of the RS banking sector by AB RS, and its influence on the further development of the financial market in the Republic of Srpska.

Supervision of the banking sector

The essence of the supervision of the banking and financial system of a country is primarily the protection of depositors, investors and shareholders of financial institutions from various risks to which they are exposed. One of the more important goals of supervision is to reduce the consequences of bad practice and fraud, that is, to isolate the effects of any loss produced by a certain institution, thus preventing the emergence of a potential "domino effect ".

The role of the bank within the financial system is to provide loans, receive deposits and provide other financial services to clients, observing strict legal regulations that were prepared primarily to protect the interests of the public. In order for the function of bank supervision to be carried out effectively, it is necessary to have adequate resources and legal authorizations for the implementation of prudent supervision, the establishment of independent regulatory and supervisory authorities, as well as a clear definition of the supervisor's responsibilities in the process of performing supervisory activities.

The reform of the banking system is aimed at crisis prevention, more efficient supervision of the banking system, timely intervention of supervisors in the event of a deterioration in the financial position of banks, and determination of authorizations and instruments for managing the exit process of failed banks from the market, with minimal reliance on public funds.

Regulation and supervision business operations of banks are understood as market conditions and economic conditions.

and leadership functions, along with the existence of asymmetric information, leads to problems in the relationship between bank owners (principals) and bank managers (agents). Dissatisfied with the support they have from the owners, bank managers are often not interested in maximizing profits as much as the bank owners themselves and, in the desire to achieve personal benefits, they may decide to carry out certain "dubious" activities that the bank owners are not comfortable with. to meet.

Increased and stricter regulation of bank activities puts the competition of commercial banks and their active participation in the financial market in the foreground. Commercial banks emphasize profitability and placement, in conditions of variable interest rates and fluctuating exchange rates, while accepting greater risk in order to remain competitive on the financial market.

In order to reduce the influence of systemic risk on the operations of banks, it is necessary to establish a new form of control through the supervision of banks, and in order to preserve their systemic stability. With the supervision of banks, rules are adopted that create market discipline and motivate private monitoring of banks, which has proven to have an impact on the operations of banks, and thus on improving the impact of banking on the entire economy.

Through supervision and measures to eliminate established irregularities and weaknesses, ABRS aims to ensure a stable, solvent, liquid and profitable banking system of the Republic of Srpska. A complicating circumstance for the regulator in the implementation of business activities is that banks, that is, financial institutions in search of profit have a good motive for avoiding existing regulations and looking for "loopholes", finding a way to avoid regulations, which is why the regulator has to modify them. In a financial system in which changes are very frequent, regulatory authorities often face new challenges, because if they do not respond to changes quickly, they will not be able to prevent financial institutions from taking excessive risks. Also, aggravating circumstances for the regulator are "little things" that can be extremely important, because if even the smallest differences appear in the data, they can cause unfathomable consequences. However, although according to the legal framework ABRS has operational independence, the very context in which it operates is difficult due to the significant interdependence between the Government and the domestic banking sector, whose influence is not negligible.

With the decisions (year 2020) on the introduction of temporary measures in order to mitigate the negative consequences caused by the COVID-19 virus, ABRS undertook activities aimed at preserving the stability of the banking sector of the Republic of Srpska. The measures were related to the granting of relief to the bank's clients who were affected by the negative effects of the pandemic, in order to overcome the difficulties they are facing and to properly settle their obligations to the bank in the following period. Also, the measures related to certain rules for credit risk management and capital preservation of banks, etc.

Deposit insurance

The need to protect the deposits of commercial banks is caused by the unstable situation on the world financial market. The financial sector is one of the most strictly regulated sectors in the economy, and banks are the most regulated of all financial institutions. Regulatory processes do not always function as expected and as they should, as evidenced by the crises of banking systems.

A government deposit insurance program can reduce the influx of depositors into banks, protecting them and allowing them to reinvest funds in the banking system.

In addition to deposit insurance, governments have often helped domestic banks that get into trouble, even those that do not have insured deposits, most often in the form of the Central Bank approving loans to troubled banks - "the role of the lender of last resort". In other cases, troubled banks receive funding directly from the government or are taken over by the government.

The basic principles of the Basel Committee for Successful Banking Supervision confirmed that a carefully created deposit insurance system can significantly contribute to public confidence in the financial system and thus limit the "contagion" from banks in trouble, with the fact that it did not offer instructions for successful deposit insurance systems at the same time. The introduction or reform of the deposit insurance system is more successful if we have a healthy banking system and stable institutions in the environment. However, depositors are aware that they will not suffer any losses up to the amount of the insured deposit, if the bank fails, and they do not impose market discipline on banks, that is, they do not withdraw funds when they suspect that the bank has engaged in risky business. On the other hand, because of such security, banks are motivated to take greater risks. Since protected depositors do not have much reason to monitor the bank's activities, without the government's interference in the banking sector, fraudsters can also get into the banking sector and, for all the bad things they do, they can get a light sentence..

"Too Big to Fail" explains that bank regulators are reluctant to allow a large bank to fail and cause large losses to its depositors, since the failure of a large bank leads to a major financial upheaval in the country.

In June 2020, a new Law on deposit insurance in banks of Bosnia and Herzegovina was adopted. The main goal of the Law is to ensure the protection of deposits of individuals and legal entities in banks that have received a license to operate from the competent banking agency and thus contribute to the preservation of overall financial stability. Also, the Deposit Insurance Agency of Bosnia and Herzegovina receives a new mandate - to participate in the process of bank restructuring with the funds of the Deposit Insurance Fund, in certain cases. The deadline for paying depositors due to the revocation of the bank's license to operate is shortened from 90 to 20 working days.

The maximum amount of the insured deposit that is currently paid out by the Deposit Insurance Agency of Bosnia and Herzegovina amounts to 50,000 KM (together with the calculated interest per depositor per member bank, less the depositor's legal or contractual debt to the bank).

The banking sector in the Republic of Srpska

The banking system of the Republika Srpska includes banks, microcredit organizations, savings and credit organizations, lessors and other financial organizations whose establishment and operations are regulated by a special law.

The banking sector in Republika Srpska has a high degree of legal and regulatory organization, and "conservative banking" prevails in character, with deposits as the main source of business and loans as the main product. Under the influence of economic and financial instability, the growth of the banking sector slowed down for a long period, and the exposure primarily to credit risk increased.

The banking sector of the Republic of Srpska as of June 30, 2019. year consists of eight banks (Table 1) with the majority of private capital, with the dominance of foreign equity capital at five banks, i.e. with the majority participation of domestic equity capital at two banks. Two banks have state share capital, and the share of state share capital in the total share capital of banks in Republika Srpska is about 0.7%.

The ownership structure of banks in the Republic of Srpska is given in the following table:

Tabela 1: Struktura akcionarskog kapitala sa stanjem na dan 30.06.2021. (mil. KM)

Red. broj	Banka	Privatni kapital		Državni kapital		Zadružni kapital	
		Iznos	%	Iznos	%	Iznos	%
1.	Nova banka a.d. Banjaluka	184,5	26,8	0,0	0,0	0,1	68,1
2.	NLB banka a.d. Banjaluka	62,0	9,0	0,0	0,0	0,0	0,0
3.	UniCredit Bank a.d. Banjaluka	97,0	14,1	0,0	0,0	0,0	17,4
4.	Sberbank a.d. Banjaluka	62,2	9,0	0,0	0,0	0,0	0,0
5.	Addiko Bank a.d. Banjaluka	153,1	22,2	0,0	0,0	0,0	1,4
6.	MF banka a.d. Banjaluka	51,1	7,4	0,0	0,0	0,0	0,0
7.	Komercijalna banka a.d. Banjaluka	60,0	8,7	0,0	0,0	0,0	0,0
8.	Naša banka a.d. Bijeljina	18,8	2,7	5,0	100,0	0,0	13,0
UKUPNO:		688,7	100	5,0	100	0,2	100

Izvor: ABRS,(2021) "Izvještaj o stanju u bankarskom sistemu Republike Srpske za period 01.01.2021-30.06.2021.",str.21

From the tabular overview, it can be seen that the total share capital in the banking sector (694 million KM) consists of private share capital (99.3%), state capital (0.7%) and a small share of cooperative capital.

Private foreign share capital constitutes 66% of the total private share capital of the banking sector of the Republic of Srpska as of June 30, 2021. years. The dominant position is held by shareholders from Austria with a share of over 30%, Italy with a share of 15%, and Slovenia, Serbia and other countries with a share in the total share capital of 20%.

Balance Sheet

Total assets of the banking sector at 3 0. 06.20 21. year is 10.3 billion KM, and it consists of net assets in the amount of 9. 2 billion KM and off-balance sheet assets in the amount of 1.2 billion KM. Gross loans of the banking sector at 3 0. 06.20 21. years are 5. 6 billion KM and make up 59 % of total assets.

primary source of funding for the banking sector, and thus the volume of operations, planning and management of the business policy of each bank is directly dependent on the level, structure and maturity of deposits. Deposits of the banking sector at 3 0. 06.20 21. years are 7. 1 billion KM and make up 7-8 % of the total liabilities.

Structure of the balance sheet of the banking sector of the Republic of Srpska as of 30. 06.20 21. year is given in the following table:

Table 2: Balance sheet

Description	30.06.2021.	
	Amount (mil. KM)	**%**
ASSETS:		
Cash assets	2.371	25
HOV for trading	1.161	12
Placements with other banks	21	0
Loans (gross)	5,605	59
HOV until maturity	31	0
Business assets 139and 139other fixed assets	196	2
Other assets	129	1
IN TOTAL:	**9,514**	**100**
Value corrections	364	
Value corrections for loan items	341	
Corrections values For items 139cive without credit	23	
NET ASSETS:	**9,150**	
Total off balance	1162.5	
Active off balance	1.085	
Commission affairs	77	
TOTAL ASSETS	**10,312**	
LIABILITIES:		
Deposits	7,090	78
You took out loans	0	0
Obligations for taken loans	674	7
Subordinated debts	52	1
Other obligations	194	2
Reserves for off-balance sheet items	11	0
Capital	1.128	12
TOTAL LIABILITIES AND EQUITY	**9,150**	**100**
Total off balance	1.163	
Active off balance	1.085	
Commission affairs	77	

TOTAL LIABILITIES	10,312	

Source: www.abrs.ba

The balance sheet of the banking sector of Republika Srpska is based on balance sheets of eight banks. The rate of change in off-balance sheet net assets is 6.1% and is 3.1% higher than at the end of 2020, which is an indicator of positive trends in the activities of banks in pandemic conditions

COVID-19.

Income statement

Total revenues of the banking sector from 3 0. 06.20 21. were 240 million KM. In the structure of total income, the most significant share is income from interest and similar income in the amount of 149 million KM, that is, they make up 6.2 % of total income. Operating revenues make up 3 8 % of total revenues.

Total expenditures of the banking sector in the same period amounted to 171 million KM. In the structure of total expenditures of the banking sector, the most significant share is operational expenditures in the amount of 116 million KM, that is, they make up 67.8 % of total expenditures. Interest expenses and similar expenses amounted to 30 million KM (17.3%), that is, business and direct expenses amounted to 26 million KM (1.5 % of total expenses).

Structure of the Income Statement of the banking sector of the Republika Srpska at 30. 06.20 21. year is shown in the following table:

Table 3: Income statement

(mil. KM)

DESCRIPTION	30.06.2021.	
	Amount	**%**
INTEREST INCOME, ETC. INCOME		
Interest income, etc. Income	149	62
Operating income	92	38
TOTAL INCOME	**241**	**100**
EXPENSES		
Interest expenses and similar expenses	30	17
Business and direct expenses	26	15
Operating expenses	116	68
TOTAL EXPENDITURE	**171**	**100**
TOTAL INCOME-EXPENSES	**70**	
PROFIT BEFORE TAX	**70**	
LOSS	**0**	
TAXES	**5**	

Profit as per basis more dept. Lt. means. and reduce. dept. Lt. obligation	**0**	
Loss as per basis reduce. dept. Lt. means. and more dept. Lt. obligation	**1**	
NET PROFIT	**64**	
NET LOSS	**0**	

Source: www.abrs.ba

According to ABRS data, in the first six months of 2021, there is a 9% increase in total revenues and a 5% decrease in total expenses compared to the same period in 2020. That is, all eight banks in the Republic of Srpska reported a net profit in the total amount of 64 million KM, which is 26 million (69%) higher than in the same period of 2020. The rate of return on capital is 12.1% and is higher by 4.8%, and the rate of return on assets is 1.5% and represents an increase of 0.6% compared to the first six months of 2020.

Financial safety net

The financial security network can limit the risk that banks take, reduce the chances of insolvency or illiquidity, as well as to stabilize the fear of the private sector due to events related to the collapse of certain banks (eg Bobar banka, Banka Srpske, etc.).

The importance of banks within every economy causes the need for strict regulation of the banking sector, as well as for the establishment of a financial security network, which in a country in the narrowest sense consists of:

- The central bank, which most often plays the role of "creditor of last resort",
- banking regulation and supervision i
- deposit insurance.

The safety net has four main objectives:

1. Regulation and supervision are established to ensure that banks operate in a safe and sound manner. Regulation provides guidelines for acceptable risk-taking, and supervision ensures that regulations are followed.
2. The banking sector must have access to a safe haven as a last resort. An unexpected lack of liquidity can cause a bank failure and collapse of the financial system.
3. Mechanisms for resolving the failure of financial institutions ensure that failed banks are removed quickly, before financial difficulties spread to other institutions.
4. The safety net ensures the protection of depositors, primarily small and relatively vulnerable depositors.

The level of coverage is certainly an important feature of the safety net that supports private depositors. If it is set too low, relatively small depositors may face uncertainty about the bank where they hold their deposits. If the level of coverage is too high, large sophisticated depositors will not impose market discipline and banks may expose themselves to business with a higher degree of risk. In both cases, strong supervision and an effective bank resolution framework can mitigate some of the negative consequences of an inadequately determined coverage level.

An efficient safety net system implies relief for depositors when fulfilling their obligations, including paying depositors quickly, accurately and on a fair basis, while reducing the costs of disruptions in the market, maximizing recovery from assets, and strengthening discipline through legal frameworks and actions in case of negligence or other wrongful activities. Participants in the safety net of the financial system should be empowered to establish flexible mechanisms to preserve the critical function of banking.

The currency board arrangement gives the CBBH limited room to maneuver in case of a banking crisis. The CBBH should increase its monitoring authority and effectively link with other agencies, especially the Banking Agencies.

The financial security network, therefore, consists of institutions that have the authority and responsibility to regulate and supervise the operations of banks, and to intervene when necessary to protect depositors and preserve financial stability.

In a situation where systemic crises occur, the government of the country is involved as support for the financial security network. The withdrawal of deposits during a banking panic, the reduction of credit activities due to the withdrawal of deposits, as well as the possibility of bank failure encourage every country to create an adequate network of financial security. For this reason, the financial safety net should be set up in a way that will ensure prudent regulatory policy and discourage unwanted withdrawal of deposits. The division of authority, power and responsibility between participants in the financial safety net is a matter of public policy choices and conditions in individual countries.

Trends in the movement of collected deposits

Bank deposits (78 % of total liabilities) are the primary source of funding for the banking sector of the Republic of Srpska. The planning, scope and management of the business policy of each bank is directly dependent on the level, structure and maturity of deposits. N a 30.06.2021. In 2019, the deposits collected in the banking sector of the Republika Srpska amount to 7 billion KM and are higher by 11 % compared to the same period in 2020, i.e. 15 % in 2019. Deposits in convertible marks (68%) recorded growth compared to deposits in foreign currency.

An overview of the sectoral structure of the total collected deposits of the banks of the Republic of Srpska in the observed period is given in the following table:

Table 4: Sector structure of total collected deposits

(mil. KM)

DESCRIPTION	30.06.2019.		30.06.2020.		30.06.2021.	
	Amount	**%**	**Amount**	**%**	**Amount**	**%**
Government and government institutions	643.8	10.5	722.4	11.4	1033.1	14.6
Public and state enterprises	248.0	4.1	286.5	4.5	359.0	5.1
Private companies and societies	813.4	13.3	847.6	13.4	1035.7	14.6
Non-profit organizations	99.7	1.6	112.0	1.8	116.6	1.6
Banks and banking institutions	333.8	5.5	423.3	6,7	171.8	2,4
Non-bank fin. Institutions	345.1	5,6	247.6	3.9	299.8	4.2
Citizens	3551.7	58.0	3,671.9	58.0	4049.2	57.1
Other	84.8	1.4	18.3	0.3	24.6	0.3
IN TOTAL	**6,120**	**100**	**6,330**	**100**	**7,090**	**100**

Source: *www.abrs.ba*

From the tabular review, it can be seen that the largest growth is in the deposits of the government and government institutions, amounting to KM 310.7 million (43%), citizens' deposits, amounting to KM 377.3 million (10%), and private companies and societies increasing by KM 188.1 million (22%), compared to the same period in 2020.

The drop in deposits was recorded only at banks and banking institutions, by 251.5 million KM (60%).

is mostly the result of trust in the deposit insurance institute and fear of any investment. In the earlier period, the period of insolvency and liquidation of banks, the Deposit Insurance Agency operated flawlessly, and if it were to fail, it would inevitably lead to the collapse of the banking system.

The deposit base, primarily of citizens (57.1%), is quite sufficient for the current level of credit activities of banks. However, the term structure of citizens' deposits is unfavorable from the point of view of the possibility of long-term lending.

An overview of the maturity structure of the total collected deposits of the banks of the Republic of Srpska is given in the following table:

Table 5: Due date structure in total collected deposit (mil. KM)

DESCRIPTION	30.06.2019.		30.06.2020.		30.06.2021.	
	Amount	**%**	**Amount**	**%**	**Amount**	**%**
Savings and demand deposits	3,354.5	54.8	3,595.8	56.8	4,499	64
Up to 3 months	80.3	1,3	45.2	0.7	8	0
Up to 1 year	445.9	7.3	364.0	5.8	203	3
1. Total short-term deposits	**3,881**	**63**	**4.005**	**63**	**4,711**	**67**
Up to 3 years	1,929.7	31.5	2,003.4	31.7	2,074	29
Over 3 years	310.1	5.1	321.2	5.1	305	4
2. Total long-term deposits	**2,240**	**37**	**2,325**	**37**	**2,379**	**34**
Total deposits	**6,120**	**100**	**6,330**	**100**	**7,090**	**100**

Source: www.abrs.ba

The overview shows that short-term deposits grew by 706 million KM (18%), and long-term deposits increased by 54 million (1%) compared to the same period in 2020. That is, short-term deposits recorded a growth of 21%, and long-term deposits 6% compared to the same period in 2019.

Short-term deposits recorded an increase in savings and demand deposits by 903 million KM (25%), a decrease in short-term savings up to 3 months by 37.2 million KM and up to 1 year by 161 million KM compared to the same period in 2020.

In terms of long-term deposits, deposits up to 3 years recorded an increase of 70 million KM (3.5%) compared to the same period in 2020, i.e. 145 million KM (8%) compared to the same period in 2019.

Deposits over 3 years are lower by 16 million KM (5%) compared to the same period in 2020, or by 5 million KM (2%) compared to the same period in 2019.

Given that the decision on the amount of the insured deposit is made at the level of the Board of Directors of the Deposit Insurance Agency of Bosnia and Herzegovina, the possibility of quick reaction is ensured in order to fulfill the goals of public policy, that is, the protection of savers and the maintenance of the stability of the financial system are ensured. However, on the other hand, there is a need for a detailed analysis that should support the decisions made, where elements such as the level of economic development of Bosnia and Herzegovina must be taken into account (one of the determinants can be the size of the gross social product per capita), the quality of the banking sector of Bosnia and Herzegovina, the level of the Deposit Insurance Fund, the level of deposit insurance coverage in neighboring countries, as well as the provisions of the European Union Directive on deposit insurance.

Trends in the movement of credit placements

The amount of loans placed is the most important indicator of the business volume of each bank and the sector as a whole, on the one hand, but at the same time, it is also the biggest potential risk generator in business, on the other. Gross loans on day 3 0. 06.20 21. years make 59 % of gross balance sheet assets.

An overview of the sectoral structure of loans from banks in the Republic of Srpska is given in the following table:

Table 6: Sectoral structure of total loans (mil. KM)

DESCRIPTION	30.06.2019.		30.06.2020.		30.06.2021.	
	Amount	%	Amount	%	Amount	%
Government and government institutions	555.2	10.8	688.5	12.7	656.3	11.7
Public and state enterprises	221.6	4.3	237.1	4,4	235.2	4.2
Private companies and societies	1890,8	36.8	1,922.2	35.4	1952, 8	34.8
Non-profit organizations	8.5	0.2	8.7	0.2	6.2	0.1
Banks and banking institutions	0.0	0.0	0.0	0.0	0.0	0.0
Non-bank fin. institutions	47.7	0.9	61.7	1,1	47.3	0.8
Citizens	2406.4	46.8	2,502.1	46.1	2698.5	48.1
Other	11.6	0.2	10.5	0.2	9.0	0.2
IN TOTAL	**5.142**	**100**	**5.431**	**100**	**5,605**	**100**

Source: www.abrs.ba

The overview shows that the amount of total loans in the observed period is 174 million (3%) higher compared to the same period in 2020, i.e. 463 million (9%) higher compared to 2019.

Due to the emergence of an emergency situation caused by the COVID-19 pandemic, the ABRS, by decisions on temporary measures to mitigate negative economic consequences, enabled banks to offer clients who are affected by the negative effects, a moratorium on the repayment of incurred obligations, a grace period, etc. According to the ABRS report, loans for which the measures were approved make up 16% of the portfolio as of June 30, 2021. years. In accordance with the Decision on Credit Risk Management and Determination of Expected Credit Losses, in the first six months of 2021, the banks made an accounting write-off of credit claims in the amount of 24 million KM and a permanent write-off in the amount of 5 million KM.

When we look at the sectoral structure of loans placed by the banks of the Republic of Srpska, the most represented are loans placed to citizens (48%) and private companies and societies (35%), to the Government and government institutions (12%) and others. An 8% increase was recorded in loans placed to citizens, and a 2% increase in loans granted to private companies and societies compared to the same period in 2020, while a decline in lending activities was recorded in all other sectors. Loans given to the government and government institutions are lower by 4%, that is, to public and state enterprises by 1% compared to the same period in 2020.

Measures of the Government of the Republic of Srpska to mitigate the negative effects of the pandemic, restrictive measures aimed at suppressing it, support for the economy, etc. they influenced the growth of economic activity in the Republic of Srpska. For example. in the first quarter of 2021, economic activity grew by 2.3% compared to the same period in 2020.

However, the stagnation of loans in the banking sector indicates the absence of support for the real sector in. The problems of the banking and real sectors are mutually conditioned, that is, the banking sector requires high interest rates on loans, but the real sector cannot accept loans with high interest rates. The problem of inconsistency in lowering active and passive interest rates, that is, a significant drop in passive and stagnant active interest rates contributes to current profitability, but also to "sacrificing the future". Lowering active interest rates is a prerequisite for the real sector to show greater interest in loans and thus provide banks with a way out of stagnation and a more significant contribution to the economic development of the Republic of Srpska.

Looking at the maturity structure of the loan as of June 30, 2021. year, it is observed that short-term loans are higher by 15 million KM (2%), that is, long-term loans by 196 million KM (4%) compared to the same period in 2020. Due receivables recorded a decrease of 36 million KM (15%) compared to the same period in 2020.

An overview of the maturity structure of loans from the banks of the Republic of Srpska is given in the following table:

Table 7: Maturity structure of total loans

(mil. KM)

DESCRIPTION	**30.06.2019.**			**30.06.2020.**			**30.06.2021.**		
	< 1 year	**> 1 year**	**The search is due.**	**< 1 year**	**> 1 year**	**The search is due.**	**< 1 year**	**> 1 year**	**The search is due.**
Government and government institutions	2.9	550.2	2,2	4.7	682.1	1.7	5.3	650.2	0.8
Public and state enterprises	13.8	204.0	3.9	7.5	228.4	1,2	15.8	216.5	2.9
Private companies and societies	508.8	1,152.2	229.9	589.4	1,185.1	147.7	592.4	1,243.1	117.3
Non-profit organizations	2.6	2.8	3.1	1,3	6.6	0.8	0.7	5.4	0.1
Banks and banking institutions	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-bank fin. institutions	6.1	41.0	0.5	3.0	58.2	0.5	0.9	45.9	0.4
Citizens	169.2	2,113.5	123.7	169.2	2,254.1	78.8	175.5	2,450.1	72.9
Other	0	11	0	0	10	0	0.4	8.5	0.1
IN TOTAL	**704**	**4,075**	**363**	**776**	**4,424**	**231**	**791**	**4,620**	**195**

Source: www.abrs.ba

In the maturity structure of loans, long-term lending prevails, and also in the observed period, there is a growing trend.

With 3 0. 06.20 21. In 2008, long- term placements amounted to 4.6 billion KM and accounted for 82% of the total credit placement.

The largest share in the structure of long-term loans is held by loans to citizens in the amount of 2. 4 billion KM (5 3 %) and the same shows a growth trend in the observed period.

Long-term loans to private companies and companies in the amount of 1. 2 billion KM, participate with 27 % in total long-term loans at the end of June 2021 and are higher by 5 % compared to the same period in 2020.

In the structure of short-term loans, loans to private companies and companies have the most significant share, in the amount of 592.4 million KM (75%) with a growing trend in the observed period.

Short-term loans to citizens account for 22% of total short-term loans and show a slight growth trend in the observed period.

Due receivables from loans to private companies and companies and due receivables from loans given to citizens as of June 30, 2021. make up 98% of the total due receivables. The rate of overdue loans in relation to total loans is 3.5% and is lower compared to the same period in 2020 (4.3%), i.e. the same period in 2019 (7%). The reduction of overdue receivables was influenced by the application of the new ABRS Decision on credit risk management and determination of expected credit losses, which prescribes the accounting write-off of overdue loans, better credit risk management, etc.

The rate of overdue loans to private companies and companies in relation to total loans given to private companies and companies is 6%, and the rate of overdue loans to citizens in relation to total loans to citizens is 2.7%.

Total collected deposits and placed loans in Republika Srpska

Total deposits in the territory of Republika Srpska in the observed period recorded an increase of 11% compared to the same period in 2020, i.e. 2019, and the amount of loans placed was 4% higher compared to June 30, 2020. year, i.e. by 10% compared to the same period in 2019.

A comparative overview of collected deposits and placed loans in the territory of the Republic of Srpska is given in the following table:

Table 8: Deposits collected and loans placed (mil. KM)

DESCRIPTION	30.06.2019.		30.06.2020.		30.06.2021.	
	Deposit amount	**Loan amount**	**Deposit amount**	**Loan amount**	**Deposit amount**	**Loan amount**
Banks of the RS	6,120.4	5,141.8	6,329.6	5,430.7	7,089.9	5,605.2
Business units of FBiH banks	911.4	1,469.8	959.2	1,540.8	1,075.4	1,636.9
IN TOTAL:	7,031.9	6,611.6	7,288.8	6,971.5	8,165.3	7,242.1
Minus: Business units. Bank RS in FBiH	329.8	244.7	332.5	274.7	432.6	270.6
IN TOTAL	**6,702**	**6,367**	**6,956**	**6,697**	**7,733**	**6,972**

Organizational units of banks based in the Republic of Srpska, which perform activities on the territory of the Federation of Bosnia and Herzegovina, recorded an increase in deposits of 30% and a decrease in loans of 2% as of June 30, 2021. compared to the same period in 2020, i.e. a 30% increase in deposits and a 10% increase in loans compared to the same period in 2019.

Business units of banks that have their headquarters in the Federation of BiH and perform activities in the Republika Srpska recorded an increase in deposits of 12% and an increase in loans of 6% compared to the same period in 2020, i.e. an increase in deposits of 18% and loans of 11% compared to for the same period in 2019.

Supervision of banks in Europe and the world

The banking system in the USA is linked to the establishment of the Federal Reserve System (in 1913) which represents the central bank and which includes twelve federal reserve banks. The Federal Reserve System, in addition to supervising and controlling the operations of member banks, proposes and implements monetary policy, performs transactions for member banks of the system, business for the US government, and issues banknotes and coins.

The banking system of England dates back to 1694 with the establishment of the Bank of England, whose task is primarily the concentration of capital and the specialization of banking operations. The Central Bank of England consists of the banking department (Banking Department), which deals with active and passive banking operations, and the issue department (Issue Department), which deals with issuing banknotes.

The German banking system was institutionalized by the passing of the Law in 1885. The Central Bank of Germany represents a bank of the first degree, whose tasks are issuing money, determining discount policy, monetary policy reserves, credit policy, financial and treasury operations for the central government. The German banking system has as many federal units as there are districts.

It is one of the most developed banking systems in the world the Ankara system of Switzerland, in which the Central Bank of Switzerland is not a state institution, but a mixed economic institution with majority ownership by the cantons. Cantonal banks (28 banks), mainly engaged in mortgage business, represent state institutions that are distributed across the cantons.

The banking system of Japan is characterized primarily by a large number of banking institutions (about 9,000), with mutually developed financial relations and a firmly established connection with the financial authorities. The Bank of

Japan represents the Central Bank of Japan, which performs credit control, issuance and monetary policy activities, and is organized as a single institution with thirty branches in Japan and with branches in London and New York. With 55% of the capital, the state is the majority owner of the capital, that is, private capital is present with 45%. The Bank of Japan is characterized by narrow autonomy as its decisions can be limited or suspended by the Japanese government.

The role of the central bank in Serbia is performed by the National Bank of Serbia, which is responsible for its work to the National Assembly of the Republic of Serbia. Some of the responsibilities of the National Bank are: determining the monetary policy, regulating the amount of money in circulation, regulating the liquidity of banks and other financial organizations, regulating activities in foreign payments, issuing banknotes and coins, etc. The National Bank of Serbia is autonomous and independent in carrying out its activities.

Supervision of banks in the European Union

The concept of the European Banking Union implies that central and joint responsibility for financial supervision, deposit insurance and rehabilitation and settlement of credit institutes is established within the European Union. This concept should enable the countries of the Eurozone, as well as the countries that want to join the Eurozone, to unite three interconnected and complementary subsystems:

- ✓ a single supervisory mechanism,
- ✓ j unique restructuring mechanism i
- ✓ e European deposit insurance system.

The unique and binding rules for all members of the European Union represent a comprehensive regulatory framework for the functioning of the European market of financial services in order to regulate the banking system.

In order to increase the efficiency, effectiveness, market discipline and transparency of banks, the following common rules were established:

- ➢ rules related to capital requirements,
- ➢ o queer for intervention in a bank facing difficulties and liquidation i
- ➢ rules.

Given that Bosnia and Herzegovina's goal is to apply for membership in the European Union, ABRS is determined to focus its activities on harmonizing the regulatory framework with that of the European Union during the transition period. The consequences of the global financial crisis revealed significant deficiencies in the supervisory and regulatory frameworks applied in BiH, including the lack of supervisory control over excessive and impaired lending activities by banks.

The European Banking Union project was designed as one of the key factors for restoring confidence in the financial sector after the global financial crisis and preventing future financial upheavals, which implies the centralization of decision-making at the level of the European Union. With the strategy for the introduction of Basel III, ABRS envisaged changes related to improvement in the field of corporate governance in banks and the introduction of new minimum standards for risk management, introduction of new capital standards, improvement of capital quality, strengthening of capital requirements, introduction of protective layers of capital and financial leverage, etc. Also, a careful, gradual transition to the new regulatory framework is foreseen, among other things, in order to ensure that ABRS develops its own supervisory capacities for the creation and implementation of the new regulatory framework, in cooperation with all relevant domestic and foreign institutions (ABRS, 2016)..

ABRS is obliged to effectively assess the adequacy of risk and capital management by banks, and to continuously improve regulations in the field of bank supervision in order to preserve, control and strengthen the stability of the banking system of the Republika Srpska.

In October 2021, the European Commission published a Decision confirming the equivalence of the supervisory and regulatory framework in Bosnia and Herzegovina in relation to the regulations and directive of the European Parliament and the Council on prudential requirements for credit institutions and investment companies, i.e. on access to the activities of credit institutions and prudential supervision over credit institutions and investment companies. The European Commission's decision represents the achievement of the ABRS strategic goal and is of great importance for the Republika Srpska, Bosnia and Herzegovina, the banking system, the economy and citizens.

Conclusion

The purpose of supervision of the banking sector, i.e. the banking system, is primarily to protect depositors, investors and shareholders of financial institutions from various types of risks, and therefore to reduce their losses. Taking into account the results achieved in the operations of banks and other financial institutions as of the end of June 2021, it can be concluded that in the Republic of Srpska the banking system as a whole has maintained stability. Purchase, deposit and credit activities recorded growth at the end of the observed period, despite the challenges the banking sector faced due to the pandemic COVID -19. The continuous growth of deposits of the real sector speaks of its continuous strengthening, and the growth of household deposits is mostly the result of trust in the deposit insurance institute and fear of any kind of investment. The credit growth of the banking sector of the Republic of Srpska is most significantly related to the growth of citizens' loans, while the lending of private companies and companies that represent potentially significant carriers of economic and economic growth by the banks is very small, which indicates insufficient interest of the banking sector in investing in the economic activities of the Republic Republika Srpska. The trend of decreasing deposits of banking institutions from abroad indicates that foreign investors are not interested in investing in the Republic of Srpska. The deposit base of domestic persons, primarily citizens, is quite sufficient for the current level of credit activities of banks. However, the term structure of citizens' deposits does not support long-term lending, which significantly reduces the possibility of a significant contribution of banks to the economic development of the country.

The problem of mismatch in the level of active and passive interest rates, ie low passive and stagnant active interest rates contributes to current profitability, but also to "sacrifice the future". The reduction of active interest rates is a prerequisite for the real sector to show greater interest in loans and thus provide banks with a way out of stagnation and a more significant contribution to the economic and economic development of the Republic of Srpska.

ABRS should direct and activities and measures to increase overall credit activities, primarily through support to the economy, continuous supervision of banks - primarily banks of systemic importance because the most significant part of savings and other deposits are concentrated in them, capital strengthening primarily of banks that record above-average growth in assets and a reduction in the capital adequacy ratio. Also, it is necessary to improve the activities on the project "Stress tests" of banks, as well as strengthen the monitoring of credit risk, asset quality, etc.

Banking regulation should support bank operations based on safe and stable foundations.

Effective regulatory discipline requires the cooperation of all participants in the financial security network.

An efficient process of solving problem banks should ensure continuity in the performance of banking operations, protection of insured deposits, locating losses to shareholders and uninsured creditors, not relying on public money, minimizing the costs of solving problem banks, closing unsustainable banks, credibility of the resolution process, and strengthening market discipline.

Also, the effective process of solving problem banks implies that the process of solving problem banks should be such that a decision is made as soon as possible whether a bank is capable of continuing its own business or, if this is not the case, to be excluded from the system as soon as possible. in order to keep the value of the substance (asset) as high as possible.

Quick corrective supervisory measures include sending requests directly to banks, their managers and bank owners themselves, to prohibit the payment of bonuses to bank management, or request their removal from managerial positions. Supervisors are able to directly influence the bank itself through various measures and requirements, especially: maintaining a high rate of capital adequacy and liquidity position, the requirement to improve the internal control system, restrictive measures in the sense of not allowing excessive growth of bank balances, expansion of business networks, etc.

If the process of resolving problem banks lasts for a long period of time, there may be further "melting" of bank assets, the impossibility of charging the Deposit Insurance Fund for previously paid insured deposits, and thus the possible destabilization of the entire financial system.

An efficient supervisor will undertake activities and measures that will encourage corporate management and adequate risk management of banks through prescribed standards and procedures that represent the directions of action of managers in banks, adequate internal controls and audits, risk management, assessment of the banking market position, monitoring of implementation defined goals, as well as capital and liquidity management.

Of course, the environment plays a significant role in maintaining positive developments in the banking sector, primarily the economic environment, judiciary and legislation.

The banking sector of Republika Srpska has a future that will certainly be uncertain, but what is certainly certain is that the supervision of banks will continue to dictate the pace and success of the banking sector's development and operations, that is, it will play a very important role in its further progress and development.

The banking sector of Republika Srpska, viewed as a whole, showed stability due to the emergency situation caused pandemic COVID -19, although it is going through a certain period of stagnation.

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