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WHEN THE CAT'S AWAY THE MICE WILL PLAY DOES REGULATION AT HOME AFFECT BANK RISK TAKING ABROAD?

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and Gregory F. Udell



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This paper presents research conducted within the Macroprudential Research Network (MaRs). The network is composed of economists from the European System of Central Banks (ESCB), i.e. the 27 national central banks of the European Union (EU) and the European Central Bank. The objective of MaRs is to develop core conceptual frameworks, models and/or tools supporting macro-prudential supervision in the EU.

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Abstract

This paper provides the first empirical evidence that bank regulation is associated with cross-border spillover effects through the lending activities of large multinational banks. We analyze business lending by 155 banks to 9613 firms in 1976 different localities across 16 countries. We find that lower barriers to entry, tighter restrictions on bank activities, and higher minimum capital requirements in domestic markets are associated with lower bank lending standards abroad. The effects are stronger when banks are less efficiently supervised at home, and are observed to exist independently from the impact of host-country regulation.

JEL classification: G21, G28, G32.

Keywords: bank regulation, cross-border financial institutions, lending standards, financial risk.

Non-technical summary

Does the strictness of home-country bank regulation and supervision affect lending standards applied by multinational banks to borrowers abroad? Although of crucial importance this question has never received an adequate treatment in the empirical banking literature. A priori, the answer is unclear. Stricter home-country regulation may lead banks to develop a more conservative business model which they then export to their foreign markets. Alternatively, multinational banks may embark on a deliberate strategy of risk-taking abroad to make up for the lack of risky opportunities in their home-country market. For example, international banks may have an incentive to relegate their riskier activities to their foreign subsidiaries (i.e., the bank's "periphery") to which they limit their exposure. More generally, such behavior could simply reflect a "search for yield". This paper provides the first empirical test of these competing hypotheses.

We analyze bank lending standards abroad and how they relate to the degree of home-country regulation and supervision using an extensive firm-level dataset from 16 countries in emerging Europe dominated by subsidiaries of Western European banks. We use answers to detailed questions to SMEs about their financial and non-financial development to derive local measures of bank-lending behavior and lending standards. We address three questions regarding home-country "regulation" (i.e., the rules that constrain bank condition, behavior, and activities) and home-country "supervision" (i.e., the regulatory monitoring of bank condition, behavior, and activities). First, we investigate whether business lending in local host-country markets is affected by how restrictive home-country regulation and how comprehensive home-country supervision is. Second, we study whether the impact of home-country regulation and supervision depends on borrowing firms' ex-ante risk involved (measured as a firm being informationally opaque, i.e., not having its financial statement verified externally). Finally, we investigate whether home-country regulation and supervision interact in determining host-country lending standards. This combined strategy allows us to make inferences about the cross-border spillover effects of domestic regulation and supervision.

We offer three key findings. First, home-country regulation that restricts bank competition (i.e., entry by new banks and/or foreign banks) results in higher bank lending standards abroad, measured by less lending to ex-ante risky firms. Second, home-country regulation that limits bank activities (i.e., restricts banks from engaging in the securities market, in insurance, and in real estate, as well as from owning non-financial firms) results in lower bank lending standards by cross-border banks in local host-country markets, measured by more lending to ex-ante risky firms. Third, these effects occur especially when home-country supervision is less efficient (i.e., when the home-country supervisory agency is not independent from political interference, when it does not have sufficient legal power, when it does not conduct supervision through both on-site and off-site examinations, and when it does not cover all financial institutions without exception). Our results thus imply that home-country regulation which reduces profits and risk taking in the banks' primary domestic markets, leads banks to loosen their

lending standards abroad, and that there is an interaction effect between regulation and prudential supervision in that respect. Importantly, our findings hold when conditioning on a large set of observable firm-level characteristics; the effects are not subsumed in the degree of host-country bank regulation and supervision; and they survive when we control for firm selection into the application process.

The evidence in the paper points to several policy conclusions. First, while the benefits of the globalization of banking in terms of economic efficiency and growth are well understood, we show that these benefits can be sensitive to the characteristics of the regulatory environment in a few countries where most of the global banks are domiciled. Second, tighter bank regulation can have different spillover effects across borders through the lending activities of large multinational banks, depending on the type of regulation at play. For example, domestic regulation that is strict in the sense that it restricts competition can lead cross-border banks to take on less risk abroad (presumably by raising banks' charter values in their primary domestic markets). At the same time, domestic regulation that restricts non-core bank activities can lead cross-border banks to increase their risk taking abroad. Third, our findings imply that there are complementarities between regulation and supervision: regulation is most successful in reducing bank risk taking at home and pushing it to overseas markets when supervision is weak.

Our findings inform the debate on the harmonization of regulation across countries in the EU, and they provide insights into the optimal mix of regulatory tools in terms of constraining bank risk-taking. In particular, one should expect the current drive towards a common European regulatory and supervisory approach to lead cross-border banks to adjust their risk taking activities across local banking markets currently regulated by national authorities. Specifically, a federal supervisory institution should have the potential to contain risk shifting across European countries by simultaneously considering activities in home and host countries.

1 Introduction

In this paper, we analyze the effect of bank regulation in domestic (i.e., home-country) markets on multinational banks' lending standards in foreign (i.e., host-country) markets. We focus on the cross-border impact of barriers to entry, of regulatory restrictions on bank activities, and of capital stringency. Moreover, we examine whether the impact of home-country regulation on host-country lending standards depends on home-country supervision.

We are motivated by three empirical observations. For one, the available evidence suggests that bank risk taking responds to changes in domestic regulation (Barth, Caprio, and Levine, 2004; Laeven and Levine, 2009) and in domestic supervision (Buch and DeLong, 2008). Many academics and policy-makers have blamed the recent financial crisis on poor regulation and supervision, resulting in excessive risk taking prior to the crisis.¹ Second, financial institutions tend to shift poorly monitored risk exposures to taxpayers in markets where safety net benefits are greater (Kane, 2000; Carbo, Kane, and Rodriguez-Fernandez, 2009). Third, international retail and syndicated bank lending reflects conditions in parent banks both during good times (De Haas and van Lelyveld, 2010) and during times of crisis (Cetorelli and Goldberg, 2011; De Haas and van Horen, 2011; Popov and Udell, 2012).

Do these observations imply that stricter home-country regulation induces banks to develop a more conservative business model which they then export into the foreign markets they enter? Or do multinational banks embark on a deliberate strategy of risk taking abroad to make up for the inability to take on risk in their home-country market? In other words, does strict regulation and comprehensive supervision eliminate risk, or does it simply re-allocate it across markets through the actions of multinational banks? In this paper, we address these questions by taking advantage of a dataset that uniquely connects banks and firms in a large cross-section of host countries whose local markets are dominated by subsidiaries of foreign banks. These data allow us to investigate whether business lending in local host-country markets is affected by how restrictive regulation (i.e., the *rules* that constrain bank condition, behavior, and activities) and by how efficient supervision

¹For example, in a speech to the American Economic Association in January 2010, Ben Bernanke, Chairman of the US Federal Reserve, claimed that "Stronger regulation and supervision aimed at problems with underwriting practices and lenders' risk management would have been a more effective and surgical approach to constraining the housing bubble [...]."

(i.e., the regulatory *monitoring* of bank condition, behavior, and activities) is in the parent banks' home country. Crucially, we analyze the impact of home-country regulation and supervision on the riskiness of host-country lending. We also test whether home-country regulation and supervision interact in determining host-country lending standards. This empirical strategy allows us to make inferences about the cross-border effects of domestic bank regulation and supervision.

Our experimental setting is that of foreign-owned banks in Central and Eastern Europe and it provides an ideal laboratory to study the cross-border spillover of national regulation and supervision from home countries in western Europe. The corporate landscape in emerging Europe is dominated by small and medium enterprises (SMEs), with up to 99% of all firms being classified as such companies. With less developed capital markets and rudimentary corporate bond financing, banks are by far the main provider of external funds. In addition, foreign ownership in the banking sector has grown dramatically in the recent decade, and by 2008 foreign banks controlled around 80% of the assets in the region's banking industry. Finally, in each of the countries in our sample we observe firm access to credit in local markets dominated by banks with parents coming from at least two different countries, allowing us to tease out the variation in lending standards associated with variations in the home-country regulatory environment.

Our empirical strategy proceeds as follows. First, we identify firms who sought access to credit and whether they were denied credit. This latter category includes firms whose loan application was turned down by a bank, as well as firms which were discouraged from applying for loans by adverse credit conditions, for the fiscal years 2004 and 2007. While we cannot observe which bank granted/refused a loan application from a particular firms, we can observe the precise locality in which each firm operates. We proceed to hand-collect information on which banks are present in each locality, as well as on the number of branches each bank has there. This allows us to match firms and banks based on geographic proximity. In order to study the cross-border spillover of bank regulation and supervision, we focus on host-country localities that are dominated by subsidiaries of foreign banks. Then, we combine the data on firm access to finance in local markets with data on regulatory stringency and supervisory efficiency in the parent banks' primary domestic markets. The final sample consists of 9613 firms in 1976 localities across 16 countries served by a total of 155

banks. The data thus provide us with a rich empirical set-up where we can compare how access to finance varies by the firm's ex ante riskiness and by the degree of regulatory stringency and supervisory efficiency faced by the parent bank in its home country, after having netted out the effect of host-country regulation and supervision.

As an illustration, consider the Czech Republic. Its banking sector is dominated by three banks, which are subsidiaries of Erste Group (Austria), KBC (Belgium), and Societe Generale (France). We observe access to finance by 598 firms in 95 local Czech markets. Our empirical strategy then rests on comparing access to finance by firms in a local market dominated by a subsidiary of KBC to access to finance by firms in a local market dominated by Erste Group and relating variations in this access to differences between the regulatory environments in Belgium and in Austria. We further identify the supply effect by appropriately accounting for demand with detailed firm-level data.

We face two main challenges in our analysis. The first challenge is that the banks' entry decisions are not made randomly, i.e., banks tend to strategically choose their foreign markets of operation on the basis of proximity and perceived growth opportunities. For example, South-Eastern Europe has a large presence of Greek banks, while the Baltic countries are dominated by Scandinavian banks. A cross-country study of lending behavior ignoring this entry decision-making would suffer from a standard omitted variables' problem. Our within-country cross-locality empirical set-up is the first step to circumventing this problem. Comparing localities allows us to net out the effect of host country omitted variables with host country fixed effects. To mitigate the even deeper concern that foreign banks made their entry choices based on the characteristics of the individual local markets that they were trying to get access to, we employ an instrumental variables approach where we use geographic proximity and institutional similarity to extract the exogenous component of foreign bank entry.

A second challenge is that using loan rejection rates to define risk taking may be prone to a selection bias as applicant firms may be a systematically truncated sub-sample of all firms. For example, some firms do not apply because they do not need credit, while others do not apply because they are discouraged. If, for example, financially stronger firms account for a larger share of all

firms in local markets dominated by banks from tightly regulated markets, we may overestimate the effect of home-country regulation on host-country risk taking. By observing data on non-applicant firms we are able to address this question in a standard two-step selection framework (see Ongena and Popov, 2011; and Popov and Udell, 2012, for recent applications).

Our key findings are as follows. First, lower barriers to entry in domestic markets (proxied by a regulatory environment that is more permissive of bank competition) results in lower lending standards by cross-border banks in local host-country markets (proxied by more lending to ex ante risky firms). Second, higher restrictions on non-core bank activities (like bank involvement in securities markets, insurance, and real estate, ownership of non-financial firms, etc.) also result in lower lending standards by cross-border banks in local host-country markets. Third, these laxer lending standards occur in these scenarios, and when minimum capital standards are higher, especially when home-country supervision is inefficient.

Uncovering the exact mechanisms through which these effects are realized is beyond the scope of this paper. Nevertheless, one potential hypothesis explaining our results is that home-country regulation which reduces banks' profitability in their primary domestic market, either by lowering their charter value or by restricting them from engaging in certain activities, leads banks to loosen their lending standards and take on more risk abroad. This result could be viewed as qualifying the findings widely reported in the literature that foreign banks "cherry pick" the borrowers that they lend to in host countries (e.g., Berger, Klapper, and Udell, 2001; Gormley, 2010; Mian, 2006; see Degryse, Havrylchyk, Jurzyk, and Kozak, 2009, for a recent survey). Our findings suggest that this phenomenon may depend on the nature of home-country regulation. Importantly, our findings hold when conditioning on a large set of observable firm-level characteristics, the effects are not subsumed in the degree of host-country bank regulation and supervision, and they survive controlling for firm selection into the application process.

The paper proceeds as follows. Section 2 formulates the research hypotheses and presents the data. Section 3 describes the empirical methodology and the identification strategy. Section 4 presents the main results on the link between home-country regulation and supervision and host-country lending standards. Section 5 discusses how our results relate to the extant literature, and

Section 6 concludes.

2 Hypotheses and Data

2.1 Hypotheses

There are two hypotheses that describe the relationship between home-country bank regulation and supervision and host-country bank lending standards. First, the foreign banks in our data are almost exclusively present in foreign markets through subsidiaries rather than through branches. Subsidiaries are separately capitalized and subject to host-country regulation and supervision by default.² The null hypothesis then is:

(H0) The strength of home-country regulation and supervision is uncorrelated with host-country bank lending standards.

Second, stricter regulation at home may reduce the bank's incentives to engage in risk taking in its primary domestic market. For example, capital regulations should reduce the risk taking incentives of owners by forcing them to place more personal wealth at risk (Kim and Santomero, 1994). Regulators can also impose restrictions on various non-core bank activities in an attempt to contain bank risk. In addition, they could restrict competition if they fear that competition may erode the charter value of existing banks and encourage them to pursue riskier policies in an attempt to maintain profit levels (Keeley, 1990). Such restrictive regulation may lead banks to develop a more conservative business model, which they later export when they enter foreign markets. Also, they may be induced to act abroad "as if at home" by various mechanisms, like a reputational one. This type of behavior would in general be consistent with the empirical literature that has found that foreign-owned banks operating in emerging markets are more prudent than domestic banks (e.g., Crystal, Dages, and Goldberg, 2002).

Alternatively, stricter home country regulation and supervision may induce multinational banks to embark on a deliberate strategy of risk taking abroad to "make up" for the inability to engage in

²See the EU's Capital Requirements Directive http://ec.europa.eu/internal_market/bank/regcapital/index_en.htm. The Directive makes explicit the difference between foreign branches and foreign subsidiaries. The home-country regulator is responsible for the entire conglomerate if the bank has expanded abroad through branches. If it has expanded abroad through subsidiaries, then the subsidiaries are evaluated by the host-country regulator.

risk taking in their home-country market. For example, international banks may have an incentive to relegate their riskier activities to their foreign subsidiaries (i.e., the bank's "periphery") to which they limit their exposure (Powell and Majnoni, 2007). In that sense, risky behavior abroad could reflect a "search for yield" (Rajan, 2006; Goldberg, 2009). Another possibility is that stricter regulation leads to more risky behavior both in domestic and in foreign markets. For example, capital regulation might lower lending standards if owners compensate for the loss of utility from more stringent capital requirements by selecting a riskier investment portfolio (Koehn and Santomero, 1980; Buser, Chen, and Kane, 1981). Restrictions on various bank activities could reduce the utility of owning a bank, intensifying the risk taking incentives of the owners relative to the managers (see Laeven and Levine, 2009, for a discussion). Also, less competition among banks could result in higher interest rates being charged on business loans, leading to a higher borrower credit risk as a result of moral hazard (Boyd and De Nicolo, 2005).

The alternative hypothesis then is:

(Ha1) The strength of home-country regulation and supervision is positively correlated with host-country bank lending standards.

(Ha2) The strength of home-country regulation and supervision is negatively correlated with host-country bank lending standards.

2.2 Data

In this section, we discuss the various data sources from which the dataset used in this paper is constructed.

2.2.1 Cross-border banking in emerging Europe

We wish to determine how home-country regulation and supervision affects host-country lending standards. To that end, we start by building a new database of the geographical presence of cross-border banks in local host-country markets. We choose a sample of 16 emerging European markets where foreign bank presence is particularly relevant and for which we also have firm-level data. Next, we determine the set of banks that operate in each host country and that together hold at

least 80% of the banking sector assets in this country. We do so in order to make the matching of banks and firms more manageable by excluding banks with an insignificant national presence. This gives us a range of between 4 banks in Estonia and 9 banks in Bulgaria. Given this criterion, we determine that the localities in the sample were served by a total of 155 banks. Out of those, 28 are domestic banks, and 127 are branches or subsidiaries of 23 foreign banks. There is considerable variation in foreign bank penetration in the sample: in 2008, for example, foreign ownership of banking sector assets ranges from 22.8% in Slovenia to 98.9% in Estonia. Finally, we determine which of these banks were present in which locality in the sample, and how many branches each had in each locality in which it was present.³ We compile this information for a total of 1976 localities. This exercise allows us to determine not just which bank is present in which local market, but also its market share at the unit of observation of the locality (city / town / village). While we also collect data on domestic banks in the process, in the empirical exercises we focus on those localities that are *dominated by foreign banks*. In practice, this means localities in which branches and subsidiaries of foreign banks account for: 1) at least 50% of all bank branches, 2) at least 50% of all banks present, or 3) at least 50% of total assets of all present banks. Depending on which of the three criteria is used, we end up with a bank branching map of at least 1810 localities.

Appendix 1 illustrates the degree of foreign bank penetration in each country in the sample. Clearly, a group of 23 west European and U.S. banks controls the vast majority of assets in the region. These are Erste Group, Hypo Group, Raiffeisen, and Volksbank (Austria), Dexia and KBC (Belgium), Danske Bank (Denmark), Nordea Bank (Finland), Societe Generale (France), Bayerische Landesbank and Commerzbank (Germany), Alpha Bank, EFG Eurobank, Emporiki Bank, National Bank of Greece, and Piraeus Bank (Greece), AIB (Ireland), Intesa Sanpaolo and UniCredit Group (Italy), ING Bank (Netherlands), Swedbank and Skandinaviska Enskilda Bank (Sweden), and Citibank (U.S.). There is also substantial regional variation in the degree of penetration: for example, the Greek banks operate mostly in South-Eastern Europe, the Scandinavian banks in the Baltic countries, and the Austrian banks in central Europe. In addition, there is one domestic "global" bank, the Hungarian OTP, as well as cross-border penetration by, for example,

³Constructing the bank branching network used in the paper was made possible after an extensive research of the web pages of all banks involved. In many cases, information was only available in the respective national language.

Parex Group - Latvia and Snoras Bank - Lithuania.

Appendix 2 lists the coverage in terms of total banking assets in each country. It ranges from 78.2% in Serbia to 98.2% in Albania, with an average sample coverage of 88.8%. Figure 1 presents a map of home countries (where the parent banks are domiciled) and of host countries (where the local firms and the branches and subsidiaries of foreign banks operate). The map illustrates our country selection strategy. In terms of host countries, the only markets in emerging Europe that we have excluded are ones where foreign bank presence is limited,⁴ or ones where it is diluted by the presence of many other banks (like Russia or Ukraine). In terms of home countries, some markets where large cross-border banks are domiciled, like Spain, Switzerland, and the UK, are excluded because the presence of banks such as Santander, UBS, and HSBC in the region is very limited. Finally, only ING and Citigroup are present in the sample countries through branches of the parent bank rather than through subsidiaries.⁵

2.2.2 Bank regulation and supervision

We analyze bank regulatory and supervisory tools which have been highlighted by theory to affect bank behavior and which vary sufficiently across the home countries in the sample. We draw on data from two databases. The first one derives from Barth, Caprio, and Levine (2006) who construct indices of bank regulation and supervision for over 150 countries for end-2002 based on specific survey questions. The second one derives from Abiad, Detragiache, and Tressel (2008) who construct indices of bank regulation and supervision for 91 economies over 1973-2005 based on an assessment of the respective country's regulatory regime.⁶ For consistency's sake, we take all four indices at end-2002 in the main tests, and employ the time dimension in Abiad, Detragiache, and Tressel (2008) when assessing the effects on home-country bank risk in robustness. In all, we employ four indices, three pertaining to regulation and one pertaining to supervision.

⁴For example, we exclude Azerbaijan (7.5% foreign ownership), Belarus (19.7%), Kazakhstan (5.4%), Russia (17.2%), Tajikistan (6.6%), Turkmenistan (1.1%), and Uzbekistan (4.4%).

⁵The national regulator's incentives to intervene in a multinational bank may differ depending on the bank's mode of foreign representation (Calzolari and Loranth, 2011).

⁶While the indices are based on quantifiable rules and changes thereof, in some cases country-specific knowledge has been used and judgement has been applied to complement formal rules. For example, in Spain, the banking system is dominated by savings banks. So, while barriers on branching restrictions were lifted in the early 1980s for commercial banks, in the dataset Spain is coded as liberalized from 1992 on, when savings banks were allowed to open up branches anywhere in the country (see Abiad, Detragiache, and Terrones, 2008).

Barriers to entry is an index which comes from Abiad, Detragiache, and Tressel (2008). It is a composite index of regulatory restrictions associated with entry barriers and privatization. The value of the first restriction is determined from the answer to the following questions: To what extent does the government allow foreign banks to enter into a domestic market? Does the government allow the entry of new domestic banks? Are there restrictions on branching? Does the government allow banks to engage in a wide range of activities? The value of the second restriction is determined from the answer to the following question: To which degree do state-owned banks dominate the domestic market? The resulting composite index measures the degree to which regulation restricts competition, in particular by foreign and private banks.

Restrictions on bank activities measures regulatory impediments to banks engaging in the securities market (e.g., underwriting, brokering, dealing, and all aspects of the mutual fund industry), insurance (e.g., underwriting and selling), real estate (e.g., real estate investment, development, and management), and ownership of nonfinancial firms. The index comes from Barth, Caprio, and Levine (2006).

Capital stringency is an index of regulatory constraints on bank capital, and it comes from Barth, Caprio, and Levine (2006). Capital stringency does not measure statutory capital requirements, instead it measures the regulatory approach to assessing and verifying the degree of capital at risk in a bank. The index is constructed from the following nine questions. (1) Is the minimum capital asset ratio requirement risk weighted in line with the Basle guidelines? (2) Does the minimum ratio vary as a function of market risk? (3) Are unrealized values of loan losses deducted from capital? (4) Are unrealized losses in securities portfolios deducted? (5) Are unrealized foreign exchange losses deducted? (6) What fraction of revaluation gains is allowed as part of capital? (7) Are the sources of funds classified as capital verified by the regulatory or supervisory authorities? (8) Can the initial disbursement and subsequent injections of capital be executed with assets other than cash or government securities? (9) Can the initial disbursement of capital be executed with borrowed funds?

Finally, *Prudential supervision* captures the degree to which an active agency is involved in the supervision of the banking sector and (with the possible exception of the first questions) is based

on more than a mere counting of existing mechanical regulatory rules. Four questions underlie this index: (1) Has a country adopted a capital adequacy ratio based on the Basle standard? (2) Is the banking supervisory agency independent from (bank) executives' influence? (3) Does the banking supervisory agency conduct supervision through on-site and off-site examinations? (4) Does the country's banking supervisory agency cover all financial institutions without exception? The index comes from Abiad, Detragiache, and Tressel (2008).

The three regulatory indices are scaled so that higher values indicate a more restrictive regulatory environment. The supervisory index is scaled so that higher values indicate a greater degree of government intervention.

2.2.3 Bank business lending and firm-level characteristics

The data on bank lending and lending standards, as well as on firm-level characteristics come from the 2005 and the 2008 version of the Business Environment and Enterprise Performance Survey (BEEPS). We use two waves of the survey conducted in the Spring of 2005 and in the Spring of 2008 containing 13409 respondent firms from 27 countries in Central and Eastern Europe and the former Soviet Union. As explained earlier, we narrow that initial sample down to the countries (as well as localities within these countries) where there is a sizeable foreign bank penetration. The final sample thus consists of 9613 firms, observed either in 2005 or in 2008, in 1976 localities across 16 countries.

The main purpose of the survey is to obtain information from firms about their experience with financial and legal constraints, as well as government corruption. In addition, however, BEEPS also includes questions about firm ownership structure, sector of operation, industry structure, export activities, use of external auditing services, subsidies received from central and local governments, etc. Respondent firms come from 6 different sectors: construction; manufacturing (11 sub-sectors); transport; wholesale and retail; IT; and hotels and restaurants. The number of firms covered is roughly proportional to the number of firms in the country, ranging from 134 in Montenegro to 1428 in Poland. Detailed analysis suggests that the survey achieves representativeness in terms of the size of firms it surveyed.⁷ Between three quarters and nine tenths of the firms surveyed are

⁷See <http://www.ebrd.com/country/sector/econo/surveys/beeps.htm>.

"small" (less than 20 workers) and only around 5% of the firms surveyed are "large" (more than 100 workers). The survey also achieves representativeness in terms of private vs. public firms, firms with access to foreign product markets, firms which receive government subsidies, etc. Table 1 provides the summary statistics on the number of firms and their size, ownership, and other characteristics by country.⁸

For the purpose of measuring bank business lending, we use the information on the firm's most recent experience when applying for credit. Our strategy follows Cox and Jappelli (1993) in that we group firms that were turned down and firms that were discouraged from applying, as is standard in studies that rely on detailed questionnaires of this type. Formally, Question K16 asks: "Has the establishment applied for any loans or lines of credit?" For firms that answered "No" to K16, Question K17 subsequently asks: "What was the main reason the establishment has not applied for any line of credit or loan?". For firms that answered "Yes" to K16, Question K18a subsequently asks: "Has this establishment applied for any new loans or new credit lines that were rejected?". Firms that answered "No need for a loan" to K17 were classified as firms that do not desire bank credit. Firms that answered "Yes" to K18a or "Interest rates are not favorable", "Collateral requirements are too high", "Size of loan and maturity are insufficient", or "Did not think it would be approved" to K17 were classified as constrained.⁹ Figure 2 summarizes this data across the 2005 and the 2008 BEEPS.

It is crucial given our empirical strategy to separate the firms that did not apply for credit because they didn't need it from those that did not apply because they were discouraged. The literature has also suggested grouping together firms that were turned down with firms that were discouraged from applying because they are observationally equivalent. Moreover, discouragement is frequently an actual rejection that follows a conversation with the loan officer and does not appear in bank records (see Duca and Rosenthal, 1993).

Table 2 presents a summary by country of the shares of firms in need of bank loans and of constrained firms. As the data suggest, fewer firms needed credit in fiscal year 2007 than prior to

⁸See Appendix 3 for all variable definitions, as well as data sources.

⁹Using data on central and east European firms, Brown, Ongena, Popov, and Yesin (2011) show that the share of firms discouraged from applying is up to twice as large than the share of firms which applied and had their loan application rejected.

2005 (60% vs. 70%), but more firms were credit constrained (37% vs. 34%). However, this picture is slightly misleading as the question in the 2008 survey asks about the firm's experience in the fiscal year 2007, while the question in the 2005 survey asks about the firm's experience with the latest loan.

2.2.4 Bank lending standards and risk taking: Firm opacity

Our main firm-level variable used to tease out bank lending standards and risk taking is opacity. It is a dummy which is equal to 1 if the firm does not have its financial accounts verified by an external auditor, and to 0 if it does. This variable directly captures an important dimension of opacity in the sense that having an audit materially affects the informativeness of the financial statements. Audited statements allow banks to underwrite loans primarily based on financial statement ratios and covenants associated with those ratios (Berger and Udell, 2006). Information opacity is thus related to ex ante risk because unaudited statements (i.e., financial statements that have not been verified by an external auditor) have a much higher risk of material misstatement (e.g., Blackwell, Noland, and Winters, 1998; Allee and Yohn, 2009).

In addition, for audits performed by an outside audit firm, risk assessment is a very crucial stage before accepting an audit engagement. The auditor performs risk assessment procedures to obtain an understanding of the entity and its environment, including its internal control, and so audited risk includes detection risk, control risk, and inherent risk.¹⁰ Recent evidence suggests that many firms (especially SMEs) choose not to file a financial report when in distress, implying that firms which do not have their accounts verified by an external auditor, are more likely to default (Jakobson, Linde, and Roszbach, 2012). As a consequence, information opacity also captures an important dimension of ex post risk. Lending based on information opacity is therefore directly related to both bank lending standards and to risk taking by banks.

There is considerable variation across countries in this variable. For example, 80% of the SMEs in Estonia use external auditors to verify their accounts, while only 37% of the firms in Romania and Poland do. On average in the sample, about half of the firms are opaque.

¹⁰See, e.g., International Standard on Auditing 315 "Understanding the Entity and its Environment and Assessing the Risks of Material Misstatement".

3 Empirical methodology and identification

Our goal is to evaluate how home-country regulation and supervision affects host-country bank lending standards. Given the data we have assembled, the immediate approach would be to map regulation into loan rejection and firm risk associated with granted loans. However, this strategy would fail to account for the changing composition across business lenders of firms that demand bank credit, or in other words, for the fact that the sample of firms that apply for credit is not a random sample of the population of firms.

It is now customary to address this problem by incorporating information on non-applicant firms in a standard 2-step Heckman procedure. The idea is that credit constraints are only observable when a firm has a strictly positive demand for bank credit. Let the dummy variable Q equal 1 if the firm desires positive bank credit and 0 otherwise. The value of Q is in turn determined by the latent variable:

$$q = \zeta \cdot Z_{ijklt} + \varepsilon_{ijklt}$$

where Z_{ijklt} contains firm and location variables that may effect the firm's fixed costs and convenience associated with using bank credit. The variable $Q = 1$ if $q > 0$ and $Q = 0$ otherwise. The error ε_{ijklt} is normally distributed with mean 0 and variance σ^2 . The second stage regression can now be updated by adding the term $\sigma \frac{\phi(q)}{\Phi(q)}$ to the RHS, where $\frac{\phi(q)}{\Phi(q)}$ is the inverse of Mills' ratio (Heckman, 1979) derived from the first step. Identification rests on the exclusion restriction which requires that q has been estimated on a set of variables that is larger by at least one variable than the set of variables in the second stage.

Thus, in the second stage regression in which we determine the effect of domestic regulation and supervision on lending standards in foreign markets, we estimate the following equation:

$$\begin{aligned} \text{Constrained}_{ijklt} = & \beta_1 \cdot X_{ijklt} + \beta_2 \cdot \text{Regulation}_{jkt} \cdot \text{Opaque}_{ijklt} + \beta_3 \cdot \text{Regulation}_{jkt} \\ & + \beta_4 \cdot \text{Opaque}_{ijklt} + \beta_5 \cdot D_{klt} + \beta_6 \sigma \frac{\phi(q)}{\Phi(q)} + \varepsilon_{ijklt} \end{aligned} \quad (1)$$

where $Constrained_{ijklt}$ is a dummy variable equal to 1 if firm i in locality j in country k in industry l in year t is credit constrained; X_{ijklt} is a matrix of firm characteristics; $Regulation_{jkt}$ is a measure of home-country bank regulation pertaining to the banks whose branches and subsidiaries are active in locality j in country k in year t ; $Opaque_{ijklt}$ is a dummy variable equal to 1 if firm i in locality j in country k in industry l in year t does not have its accounts audited by an external auditor; D_{klt} is a matrix of country, industry, and time dummies;¹¹ and ε_{ijklt} is an idiosyncratic error term.¹² The firm-level co-variables control for observable firm-level heterogeneity. The three sets of dummy variables control for any unobserved market, industry, and business cycle variation. Essentially, they eliminate the contamination of the estimates by time-invariant sectoral characteristics, like growth opportunities; by time-invariant macroeconomic factors, like host-country regulation or taxes; and by time-varying developments common to all sample countries, like the business and/or the credit cycle. Finally, the equation is estimated using a probit model.¹³

The main parameter of interest in the model is β_2 , which measures the effect of home-country regulation and supervision on host-country lending standards defined as lending to informationally opaque firms. We construct the home-country bank regulation index by aggregating data on home-country regulation and supervision after determining which banks are present in each locality in each host country, as well as the parent bank of each bank in each locality. The underlying assumption in the absence of a direct match between each loan and the lending bank and between each rejection and the rejecting bank is that if firms were granted/denied credit, then it was most likely the result of interaction with banks in the firms' locality of incorporation. We use three different weighting criteria in constructing the index, namely, giving equal weight to each bank in that particular locality, weighting each bank's home-country regulation and supervision by the number of branches it has in the locality, or weighting it by bank assets.

Here is an example to clarify the above procedure. There are 4 banks in Estonia that hold close to 100% of the banking assets in the country: Swedbank, SEB, Sampo Pank, and Nordea. They

¹¹In the main tests, we use country \times year and industry \times year dummy interactions to eliminate the effect of unobservable country-specific and industry-specific factors that may vary over time. In robustness checks, we also include country \times industry \times year dummy interactions.

¹²Although the research question naturally invokes a difference-in-differences type analysis, there is too little variation in the regulatory variables between 2005 and 2008 to perform a meaningful analysis, which is why we restrict ourselves to level regressions.

¹³In practice, the command "heckprob" is used in Stata.

are subsidiaries of Swedbank - Sweden, SEB - Sweden, Danske Bank - Denmark, and Nordea - Finland. In 2008, our index of prudential supervision from Abiad, Detragiache, and Tressel (2008) takes on the value of 2 in Sweden, 3 in Denmark, and 1 in Finland.

Consider the city Lihula in which only Swedbank has branches. We assign the prudential supervision index a value of 2 in Lihula, and then we match this index of home-country bank supervision to all firms incorporated in that city.

Consider alternatively the city of Kuresaare, in which Swedbank, SEB, and Nordea are present. They have 2, 1, and 1 branches in that city, respectively. Consequently, in the main analysis, where we weigh the probability of each firm doing business with each bank present in Kuresaare by the number of that bank's branches in that locality, we assign the prudential supervision index a value of $\frac{7}{4} = \frac{1}{2} \cdot 2 + \frac{1}{4} \cdot 2 + \frac{1}{4} \cdot 1$, which is then matched to all firms located in Kuresaare. In the exercises where we assign equal probability of each firm in that city doing business with each bank present in that city, we assign the prudential supervision index a value of $\frac{5}{3} = \frac{1}{3} \cdot 2 + \frac{1}{3} \cdot 2 + \frac{1}{3} \cdot 1$. Finally, when weighting by bank assets, the equivalent number is 1.9.

This procedure gives us considerable variation in our main financial variables of interest within each country, due to the fact that not all banks present in a country are present in each locality, and if they are, their market presence varies by locality.¹⁴ For example, in the 2008 sample of firms, there are 1344 localities in the 16 countries in the sample, characterized by 69 unique values of the index of locality-specific home-country regulation when data on all banks in a locality are weighted equally, by 361 unique values of locality-specific home-country regulation when data on all banks is branch-weighted, and by 196 unique values of locality-specific home-country regulation when data on all banks is asset-weighted. Consequently, there is little reason to worry that the country fixed effects in the regressions capture the same variation as locality-specific regulation and supervisory strength. Importantly, identification is achieved not by comparing bank lending behavior and risk taking across countries, but across localities within countries, where the country effect is absorbed by country dummies. In the empirical exercises, we focus on the branch-weighted data, but in robustness exercises we report estimates from the other two approaches.

Finally, we need to emphasize that throughout the paper, it is implicitly assumed that the

¹⁴See Table 3 for country-level aggregates.

effect of bank risk taking is localized and experienced predominately by firms headquartered in the locality in which the bank has operations. All our empirical specifications presume that firms borrow from banks located near their address of incorporation, which is identical to the approach in, for example, Gormley (2010). In general this is expected to hold as banks tend to derive market power ex ante from geographical proximity (e.g., Degryse and Ongena, 2005). Underpinning that conjecture, empirical work regarding lending relationships in different countries has demonstrated that the average distance between SMEs and banks is usually very small. For example, Petersen and Rajan (2002) find that the median distance between a firm and its main bank over the 1973-1993 period was only four miles; in Degryse and Ongena’s (2005) sample, the median distance between a firm and it’s main bank is 2.25 kilometers (1.6 miles); and in Agarwal and Hauswald’s (2010) sample, the median distance between a firm and it’s main bank is 0.55 miles.

4 Empirical results

4.1 First-stage regressions

Table 4 presents the results from the first-stage probit regression. The probability of positive demand for bank credit is generally higher for firms in localities dominated by foreign banks from countries with higher *restrictions on bank activities*, and in two cases, this effect is also statistically significant at least at the 10% level. For example, in a locality at the 75th percentile of (branch-weighted) home-country *restrictions on bank activities*, a typical firm exhibits, *ceteris paribus*, a 3.4% higher probability that it would have a positive demand for bank credit than were it incorporated in a locality at the 25th percentile of (branch-weighted) home-country *restrictions on bank activities*.¹⁵ This implies that along some regulatory dimension, localities may differ systematically in the firms’ demand for loans. This could be because the industrial composition in localities dominated by banks domiciled in countries with higher barriers to entry is skewed towards sectors that for technological reasons do not need much external finance. Alternatively, banks from countries with tighter regulation may have endogeneously chosen to enter through branching networks that serve bank-dependent firms. Not accounting for such selection mechanism

¹⁵All percentage differences that are reported from now on are based on the marginal effects at the sample means.

would thus bias the estimates of the effect of regulation on bank lending and risk taking towards zero.

In terms of firm-level co-variates, the demand for bank credit increases in the size of the firm. One potential explanation is that because of economies of scale in loan size small firms face proportionately higher loan application costs (Brown, Ongena, Popov, and Yesin, 2011). Also, in the beginning of a recession it might be that small firms are better equipped to finance investment with cash flows than more highly leveraged large firms. In addition, some of the size effects may be picked up by ownership and structural characteristics, as sole proprietorships have a higher demand for loans. The probability of desiring credit is higher for exporters, potentially due to their faster expansion, and is lower for non-audited firms, which might simply imply that firms choose to be audited (i.e., they are willing to pay for transparency) when they plan to apply for bank credit.¹⁶ It may also be the case that audited firms have access to financial statement lending which may be a cheaper lending technology (Berger and Udell, 2006). Finally, innovative firms tend to have a higher demand for credit.

In terms of the exclusion restriction, the variables *competition*, *subsidized*, and *corruption* are included in this demand model, but excluded from the rest of the exercises. *Competition* is a dummy variable equal to 1 if the firm declared that "Pressure from domestic or foreign competitors" is "Fairly important" or "Very important" and to 0 if it responded that it is "Not at all important" or "Slightly important". *Subsidized* is a dummy variable equal to 1 if the firm has received over the past three years subsidies from national, regional, or local government, or from EU sources, and to 0 otherwise. *Corruption* is a dummy variable equal to 1 if the firm declares that "it is usually or always common to have to pay irregular additional payments or gifts to get things done with regard to customs, taxes, licences, regulations, services, etc.", and to 0 otherwise. The rationale for using these particular variables as instruments for demand is the following. Firms in more competitive environments will likely have a higher demand for external credit due to lower profit margins, but it is unlikely that credit decisions will be correlated with product market competition. Analogously, having applied for state subsidies is likely a signal for external financial need. Finally, firms whose

¹⁶The results are broadly consistent with Ongena and Popov (2011) who apply a double-selection model to the BEEPS 2005 sample.

profits are hit by unexpected shocks linked to having to bribe officials will also had a higher demand for external funds. We argue that these considerations make the three variables good firm demand shifters.¹⁷ All three variables are very positively correlated with the demand for loans, and the effect is statistically significant at the 1% level. For different weighting schemes, the F -statistics from a first-stage regression of loan demand on the three variables (unreported) is between 13 and 14, depending on different weightings of home-country regulation and supervision, which satisfies the relevance condition.

Finally, due to information limitations in the data we use at most 6678 firms in these regressions rather than the 9613 reported in Table 1. This is because from Table 4 onwards, we focus on firms in localities dominated by foreign banks. We thus lose information on 438 firms when we weigh the regulatory and supervisory variables by banks present, 738 firms when we weigh the regulatory and supervisory variables by the number of branches of each bank present, and 417 firms when we weigh the regulatory and supervisory variables by the relative assets of each bank present.¹⁸ The remaining part of the reduction is accounted for by the firms which are incorporated in localities for which no data on bank presence are available, or information on one or more explanatory variables is missing.

4.2 Home-country regulation and supervision and bank lending standards abroad

We start the main part of our empirical analysis with the estimation of Model (1) in which we study how the stringency of home-country regulation and the efficiency of home-country supervision is mapped into host-country bank-lending standards as measured by our variable for opacity and ex ante risk - the variable *opaque* which indicates that a firm's financial statements are not audited. In Table 5, we present a series of regressions in which we examine the direct and interactive asso-

¹⁷We cannot ensure, however, that the exclusion restriction is not violated. On the one hand, unlike size, ownership, whether the firm exports or not, and whether the firm is audited or not (RHS variables in the credit supply equation) are more readily observed by the bank than the competition the firm faces, whether it receives subsidies, and whether it has to pay bribes. On the other hand, firms in more competitive environments could be more efficient; if a firm is backed by government subsidies, it can be viewed as less risky.; and banks may be less willing to lend to firms that are subject to extortion. If banks had this information, the validity of some of the instruments could be put into question. While all three variables appear to be uncorrelated in a statistical sense with the probability of a firm being constrained - all else equal - we need to acknowledge this caveat.

¹⁸This implies that 438 firms reside in localities where strictly more than 50% of the banks present are domestic-owned, 738 in localities where strictly more than 50% of the bank branches belong to domestic-owned banks, and 417 in localities where strictly more than 50% of the bank assets are held by domestic-owned banks.

ciations among home-country regulation, host-country lending, and firm opacity. Specifically, after conditioning on firm-level traits and on various country, industry, and year dummy interactions, we include the interaction term of each of the locality-specific home-country regulations with firm-level information opacity. In particular, we include all firm-level co-variates from Table 4, with the exception of *competition*, *subsidized*, and *corruption*, which we omit from the regressions in order to satisfy the exclusion restriction. We examine the effect of the regulatory variables one by one (columns (1)-(4)), in a horse race (column (5)), in a horse race with a Heckman correction (column (6)), and in a horse race with a Heckman correction after including country×industry×year dummy interactions (column (7)).

The estimates of the regression coefficients on the non-excluded firm-level variables imply that small firms, sole proprietorships, non-innovative firms, and non-exporting firms tend to be more constrained in credit markets. Regarding our main proxy for informational opacity and ex ante risk, non-audited firms also tend to be more credit constrained. These results are broadly in line with findings in the literature on SME lending that foreign banks cherry-pick (e.g., Berger, Klapper, and Udell, 2001; Mian, 2006; Gormley, 2010), as well as on the literature of how credit constraints vary with firm characteristics (e.g., Beck, Demirgüç-Kunt, and Maksimovic, 2005). The sign of the inverse of Mills’ ratio is negative and significant (columns (6) and (7)), implying that unobservable factors that increase the demand for credit also decrease the probability of being constrained in credit markets.

Turning to the estimates of β_2 , we first consider the composite index of *barriers to entry*. This variable enters negatively and significantly in columns (1) and (5)-(7). This finding indicates that the direct effect of a less competition-friendly type of home-country regulation is to increase bank lending abroad. Crucially, the interaction term between regulation and firm opacity enters positively and significantly in both regressions, indicating that competition-reducing regulation results in higher lending standards abroad, implied by less lending to informationally opaque firms. In terms of the economic significance, the effect of regulation on lending depends crucially on the firm’s information opacity. For instance, column (6) implies that a firm has a 7.4% lower probability of being credit constrained if it is dealing with banks at the 75th percentile instead of with banks

at the 25th percentile of the sample home-country barriers to entry. However, an informationally opaque firm (i.e., $Opaque=1$) has only a 2.5% lower probability of being constrained if it is dealing with banks at the 75th percentile instead of with banks at the 25th percentile of the sample home-country barriers to entry. This combined evidence implies that multinational banks which for regulatory reasons face less competition at home, tend to extend more loans abroad, and that this higher volume of lending is not necessarily associated with lower lending standards as proxied by lending to ex-ante risky firms.

The association between home-country *restrictions on bank activities* and host-country lending also turns out to depend crucially on the informational opacity of the banks' corporate clients abroad. Columns (2) and (5)-(7) indicate that higher home-country restrictions on bank activities result in less credit being allocated abroad, although this effect is not statistically significant. However, the interaction term between restrictions and firm opacity enters negatively and significantly in all four regressions, indicating that the type of home-country regulation that reduces the scope of bank activities in domestic markets results in higher risk taking abroad, implied by relatively more lending to informationally opaque firms. Once again, the economic significance depends crucially on the firm's transparency. Given that the direct effect of *restrictions on bank activities* is statistically indistinguishable from zero, column (6) implies that an informationally opaque firm (i.e., $opaque=1$) has a 11.5% lower probability of being credit constrained if it is dealing with banks at the 75th percentile instead of with banks at the 25th percentile of the sample home-country regulatory stringency. The evidence thus suggests that restrictions on bank activities at home lead to lower lending standards abroad. To the degree that opaque firms are ex ante risky, this effect may be interpreted in the sense that banks look abroad for the risk they cannot take on at home.

In contrast, home-country *capital stringency* and *prudential supervision* have neither a significant level effects on lending, nor a significant nonlinear effect that depend on the firm's degree of informational opacity (columns (3) and (5)-(7) and columns (4) and (5)-(7), respectively).

To conclude, our estimates suggest that aspects of home-country regulation associated with higher barriers to competition are mapped into higher lending standards by cross-border banks in foreign markets. Conversely, aspects of home-country regulation associated with strict restrictions

on bank activities lead to lower lending standards abroad.

4.3 Home-country regulation and supervision and bank lending standards abroad: Robustness

In the previous sub-section, we had calculated a locality-specific index of home-country regulation and supervision by weighting each bank's home-country regulation and supervision by the number of branches it has in a certain locality. Given that we do not have a direct match between a bank and a firm, we needed a criterion which would tell us, which bank in its locality of incorporation each firm most likely does business with. The underlying assumption is that firms have a higher probability of doing business with banks that have a wider penetration in a certain locality. However, other criteria are also possible. For example, firms may have an equal chance of doing business with any bank in a particular locality, or they may have a higher probability of having a credit relationship with the bank that has the largest asset base. We need to check if our results are robust to such alternative criteria.

In Table 6 we investigate this possibility. Panel A reports estimates from regressions where each locality-specific index of regulation and supervision is calculated by weighting equally each bank's index of home-country regulation and supervision. Panel B reports estimates from regressions where each bank's home country regulation and supervision is weighted by the bank's assets. The results are broadly consistent with what we already estimated in Table 5. Namely, the direct effect of *barriers to entry* is to increase bank lending abroad, but such regulation results in higher lending standards abroad, implied by less lending to informationally opaque firms (columns (1) and (5)-(7) of Panel A and Panel B). Conversely, higher home-country *restrictions on bank activities* map into lower lending standards abroad, implied by relatively more lending to informationally opaque firms (columns (2) and (5)-(7) of Panel B). In the latter case, we estimate that when self-selection is accounted for (column (6) of Panel B), an informationally opaque firm has a 9% lower probability of having its loan application rejected if it is dealing with banks at the 75th percentile instead of with banks at the 25th percentile of the sample home-country regulatory stringency. We conclude that to the degree that firm opacity is associated with ex ante risk, home-country regulation that

is more conducive to competition, yet more activity-restrictive, is associated with significant cross-border spillovers in terms of risk taking by multinational banks. Finally, in both panels the sign of the inverse of Mills' ratio is negative and significant, implying that unobservable factors that increase the demand for credit also decrease the probability of being constrained in credit markets.

4.4 Interaction between supervision and regulation

In our tests so far, we found an effect of various types of regulation on lending standards, but no significant effect of supervision. However, the effect of strict regulation may itself vary with the strength of the bank supervisor. For example, restrictions on bank activities may be relatively more desirable in environments where the public sector lacks the ability to monitor banks because of inefficient official supervision. Similarly, capital regulations may be especially important in countries with a regulatory environment that does not spur private monitoring (see Barth, Caprio, and Levine, 2004, for an exposition of these arguments). Alternatively, powerful supervisors may have an incentive to undertake socially sub-optimal actions. This situation may arise if there are agency problems between taxpayers and bank supervisors, for example when supervisors are self-interested and there is uncertainty about their ability to monitor banks, as in Boot and Thakor (1993). If this is the case, then strict regulation will limit the instability consequences of powerful and efficient supervision.

To test these hypotheses, Table 7 examines whether the effect on bank lending standards abroad of regulating banks more strictly in home markets depends on the degree of home-country supervision. In particular, we perform our previous tests on two groups of localities, those dominated by foreign banks in the top half of the sample distribution of home-country supervision, and those in the bottom half of this distribution. As before, lending standards abroad are proxied by the probability of lending to informationally opaque firms in host markets. We report the estimates for all three criteria of weighting relevant home-country data in constructing host-country locality-specific indices, namely by bank branches (columns (1) and (2)), equally (columns (3) and (4)), and by bank assets (columns (5) and (6)). Only results from the horse-race regressions with a correction for self-selection and country \times year and industry \times year dummy interactions (the analogue of

column (6) in Tables 5 and 6) are reported.

The evidence implies that regulation and supervision tend to be substitutes, but not for all types of regulation. For example, the effect of *barriers to entry* in domestic markets on lending standards abroad does not seem to vary with the degree of home-country supervision; for various criteria for data-weighting, this effect goes in the same direction both when banks are less (columns (1), (3), and (5)) and more (column (6)) efficiently supervised at home. However, the decline in host-country lending standards induced by stricter *restrictions on bank activities* in home markets, tends to be magnified by inefficient home-country supervision, although this result is significant in only two cases (columns (1) and (5)). This finding lends support to those theories that yield substitutabilities between regulation and supervision. Namely, in markets with weak supervision, strict regulation (e.g., the kind that is less permissive in non-core bank activities) will be more efficient in restricting bank risk taking, pushing banks to shift risk taking abroad.

4.5 Endogeneity of foreign bank entry

In Table 8, we address the issue of the endogeneity of foreign bank entry. For example, foreign banks may in particular enter countries which are populated by fast-growing but high-risk firms. On the face of it, given our within-country cross-locality identification strategy, we shouldn't worry about this as much as studies which use country-level foreign bank presence as explanatory variable (see, for example, Giannetti and Ongena (2009)): the dominant mode of entry for foreign banks in the region has been through purchasing existing banks rather than through greenfielding, and so while the entry choice is endogenous, the variation in local presence is somewhat predetermined conditional on entry. Nevertheless, it is still entirely possible that the purchaser took into account the conditions of the target bank, including its customer base and geographic outreach. In this case, the extent of local presence by foreign banks will not be a randomly applied treatment.

In order to mitigate this problem, we attempt to extract the exogenous element of entry using an instrumental variable (IV) procedure. To that end, we need instruments which are correlated with the entry choice but not with local variations in the customer base. The set of instruments that we use for our proxies for bank regulation and supervision includes: 1) geographical distance to bank

headquarters; 2) local protection of creditors' rights; and 3) whether the host country is a member of the EU. The rationale behind this choice is that banks prefer to enter and extend loans in markets that are easier to monitor (in the sense of geographic proximity), more institutionally similar (in the sense of a common legal framework), and where their investments are better protected. This procedure is in spirit similar to Jayaratne and Strahan (1996) who use the removal of barriers to bank entry in the U.S. as an instrument to show that improvements in the quality of bank lending are causally related to economic performance.

We find that *barriers to entry* have a much weaker effect on lending standards abroad (column (1)). However, column (2) confirms that higher *restrictions on bank activities* map into lower lending standards in host-country markets, implying that the correlation we detected in the previous tests is not driven by omitted variable bias.

In column (3), we detect for the first time an effect of home-country *capital stringency* on lending standards in host countries. In particular, stricter home-country capital requirements are associated with less overall lending abroad, but with more lending to informationally opaque corporate clients. This suggests that higher minimum capital requirements at home also tend to result in lower lending standards abroad.

Finally, in this case more efficient home-country supervision is associated with more lending abroad, both in levels and in interaction with firm opacity (column (4)).

4.6 Lending to ex-ante risky firms or bank risk taking?

We have so far presented evidence that the subsidiaries of parent banks domiciled in markets with certain kinds of regulatory environment tend to exhibit lower lending standards as proxied by lending to informationally opaque firms. Naturally, while information opacity is a reasonable proxy for ex-ante risk, lending to ex-ante risky firms may not necessarily imply bank risk taking. Indeed, we have presented no evidence that opacity is related to measurable proxies of ex-post risk, like variations in firms' delinquency rates or growth rates, or to variations in the riskiness of the host-country bank subsidiaries. One interpretation of our results then, which is unrelated to bank risk taking, is that countries with tighter regulation may also have better institutions.

Superior institutions may lead to the emergence of better banks which are able to lend based more on expected profit and less on collateral. Informational opacity may not be an issue for such banks if they are in possession of better screening technologies.

One way to address this issue would be to relate home-country regulation to host-country bank risk proxied by variables like the Z-score or the bank's stock price volatility, as in Laeven and Levine (2009). Unfortunately, with several exceptions the host-country banks in our sample are not publicly traded, and so we cannot calculate proxies for bank risk based on, for example, stock price volatility. Similarly, many of the host-country banks do not have sufficient balance sheet information to allow us to calculate their Z-score. For example, for fiscal year 2007, Bankscope reports data on capital for only 57 out of the 155 banks in the dataset. Given our empirical strategy of matching probabilistically firms to all banks in a certain locality, systematically missing information would make such an exercise problematic.

Therefore, we address this criticism by using our firm-level data to calculate proxies for ex-post risky lending. We present results based on bank lending to firms with *observationally* riskier growth prospects, namely, small firms, young firms, and sole proprietorships. Prior research has generally shown that size and age tend to be negatively associated with firm risk. For example, age has been shown to be a highly statistically negative predictor of firm failure although firm size was not statistically significant in this study (Kallberg and Udell, 2003). However, in a longitudinal study of start-up firms, surviving firms were on average considerably larger than firms that did not survive (Robb et al., 2009). Moreover, in pricing regressions both age and firm size have been shown to be negatively related to loan interest rates consistent with these characteristic being associated with lower ex ante risk (Petersen and Rajan, 1995; and Berger and Udell, 1995). In addition, Table 5 shows that in particular small firms and sole proprietorships tend to be considered by banks to have riskier growth prospects as testified by the higher credit constraints such firms face.

In Table 9, we interact our proxies for various aspects of home-country regulatory stringency with these alternative firm-level characteristics. We find that small firms face lower credit constraints when they deal with the subsidiaries of parent banks which face lower *barriers to entry* and higher *restrictions on bank activities* in their primary domestic market (column (1)). We also

find that sole proprietorships and younger firms face lower credit constraints when they deal with the subsidiaries of parent banks which face in their primary domestic market a regulatory environment characterized by a higher degree of *capital stringency* (columns (2) and (3)). As firm size, ownership, and age are all readily observable, this implies that our previous results are not driven by relying on a poor proxy for risk taking.

5 Discussion of results

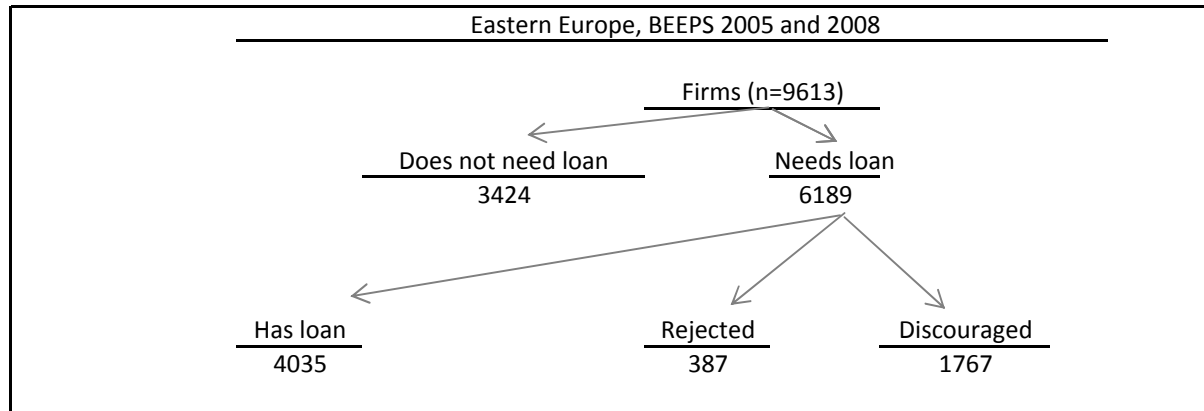
There is a large literature on the role of government in regulating economic activity (Pigou, 1938; Stigler, 1971). One of the prime targets of such regulation are commercial banks because their risk taking behavior has important implications for financial and economic fragility (Bernanke, 1983; Calomiris and Mason, 1997, 2003a,b). To that end, various domestic regulatory and supervisory agencies have been charged with the task to monitor and assess bank risk. The construction of databases containing indices of regulatory stringency and supervisory structure has enabled researchers to look into how the actions of these agencies have affected various banking developments. For example, Barth, Caprio, and Levine (2004) show that restrictions on bank activities affect negatively bank development, while capital regulations enhance bank stability. Laeven and Levine (2009) show that capital requirements and capital stringency reduce risk taking by banks, and also that this effect depends crucially on the bank's ownership structure.

Our evidence suggests that to different degrees, these results extend across borders. For example, we find that the type of regulation that restricts competition and promotes state ownership of banks results in *more loans* being extended to *predominantly ex ante safe* corporate clients in foreign markets (Table 5, columns (1) and (5)-(7)). This suggests that bank deregulation at home may give banks incentives to lower lending standards and engage in more risk taking in foreign markets. This evidence relates to theories of the beneficial effect of competition in enhancing prudent risk taking behavior, as well as to theories relating government incentives to the social desirability of economic outcomes (see Shleifer and Vishny, 1998, for an extensive treatment of both types of theories). In particular, our evidence seems to lend support to the argument in Keeley (1990) that banks with monopolistic power possess greater charter value, resulting in higher profits at home

Appendix 1. Domestic and parent banks in the sample

Country	Bank	Parent bank and country of incorporation
Albania	Alpha Bank	Alpha Bank – Greece
	Raiffeisen	Raiffeisen – Austria
	Banka Kombetare Trektare	domestic
	Tirana Bank	Pireus Bank – Greece
	Intessa San Paolo Bank Albania	Intesa Sanpaolo – Italy
	National Bank of Greece	National Bank of Greece - Greece
	Emporiki	Emporiki Bank – Greece
Bulgaria	Banka Credins	domestic
	Alpha bank	Alpha Bank – Greece
	Unicredit Bulbank	UniCredit Group – Italy
	DSK	OTP – Hungary
	First Investment Bank	domestic
	PostBank	EFG Eurobank – Greece
	Expressbank	Societe Generale – France
	United Bulgarian Bank	National Bank of Greece - Greece
	Reiffeisen	Raiffeisen – Austria
Piraeus	Piraeus Bank – Greece	
Bosnia and Herzegovina	Raiffeisen Bank Bosna i Hercegovina	Raiffeisen – Austria
	UniCredit Bank	UniCredit Group – Italy
	Hypo Alpe-Adria-Bank Mostar	Hypo Group - Austria
	Intesa Sanpaolo Banka Bosna i Hercegovina	Intesa Sanpaolo – Italy
	NLB Tuzlanska Banka	KBC - Belgium
Croatia	Volksbank Sarajevo	Volksbank - Austria
	Zagrebaska Bank	UniCredit Group - Italy
	Privredna Bank Zagreb	Intesa Sanpaolo - Italy
	Erste & Steiermarkische Bank	Erste Group - Austria
	Raiffeisen Bank	Raiffeisen - Austria
	Societe Generale - Splitska Banka	Societe Generale - France
	Hypo Alpe Adria Bank	Hypo Group - Austria
	OTP Banka Hrvatska	OTP - Hungary
Slavonska Banka	domestic	
Czech Republic	Hrvatska Postanska Banka	domestic
	Ceska Sporitelna	Erste Group - Austria
	CSOB	KBC - Belgium
	Komercni Banka	Societe Generale - France
	UniCredit Bank CR	UniCredit Group - Italy
	Citibank	Citibank - US
	Ceskomoravska zarucni a rozvojova banka	domestic
	GE Money Bank	GE Money - US
	Hypotecni Banka	KBC - Belgium
Raiffeisenbank	Raiffeisen - Austria	
Estonia	Swedbank Estonia	Swedbank - Sweden
	SEB	Skandinaviska Enskilda Banken - Sweden
	Sampo Bank	Danske Bank - Denmark
	Nordea	Nordea Bank - Finland
Hungary	OTP Bank	domestic
	K&H Commercial and Credit Bank	KBC - Belgium
	MKB Bank	Bayerische Landesbank - Germany
	CIB Bank	Intesa Sanpaolo – Italy
	Raiffeisen Bank	Raiffeisen - Austria
	Erste Bank Hungary	Erste Group - Austria
KDB Bank	KDB Seoul - Korea	

Figure 2. Responses to BEEPS questions on credit access



The figure summarizes the responses of firms to questions on access to credit in the 2005 and the 2008 BEEPS surveys.