

EU4Digital: supporting digital economy and society in the Eastern Partnership

Digital innovation SMEs' access to finance: action plan for policy recommendations: Georgia



## **Background**

The EU4Digital Facility was launched by the European Commission in January 2019. It aims to extend the benefits of the European Union's Digital Single Market to the Eastern partner countries: Armenia, Azerbaijan, Belarus, Georgia, Moldova and Ukraine. The EU4Digital Facility works in six digital thematic areas, including ICT innovation stream.

In 2019-early 2020, the ICT Innovation stream is focusing on the identification and sharing of best policies and practices of policy implementation at the national and regional level in ICT innovation field. Each Eastern partner country selected one policy area for EU4Digital Facility to focus on.

Five policy areas have been selected by partner countries:

- Intellectual property rights management for digital innovations (Armenia);
- 2. New organisational forms for supporting ICT Innovation (Azerbaijan);
- 3. Digital innovation SMEs' access to finance (Georgia, Ukraine);
- 4. ICT innovation ecosystems for start-ups and scale-ups (Moldova);
- 5. Digitising industry (digital transformation of SMEs in traditional sectors) (Belarus).

For each of these areas, the Facility has studied the best EU practices, undertaken the gap analysis in each country and developed recommendations that identify specific EU tools, platforms, practices that can be mastered by Eastern partner country stakeholders. The gap analysis and recommendations have been validated with the EU4Digital ICT innovation Expert Network of Georgia in April-May 2020.

This document provides the **action plan** for addressing the gaps related to policy area 'Digital innovation SMEs' access to finance' in Georgia. It defines six key recommendations with action steps and considerations for implementation or intervention.

The proposed action plan can be used as a basis for further activities and possible independent joint projects of stakeholders. Some of activities proposed in this action plan can be covered within the current mandate of the EU4Digital Facility (trainings, study visits, networking events, promotion activities, etc.).

This document was provided for national stakeholder consultation. EU4Digital Facility asked the stakeholders to read and share their position, comments and suggestions during the consultation.

#### List of abbreviations used in the document:

EaP - The Eastern Partnership

**EBA** – European Business Association

**EC** – The European Commission

**ECN** – European Crowdfunding network

**EU** – The European Union

GITA - Georgia's Innovation and Technology Agency

**GNCC** – Georgian National Communications Commission

**GVCA** – Georgian Venture Capital Association

MoESD - Ministry of Economy and Sustainable Development of Georgia

MoF - Ministry of Finance

NBG - National bank of Georgia

**P2P** – Peer to peer

**TBD** – To be determined

TFIRP - Trust Fund Investment Readiness Project, World Bank

WBAF – World Business Angles Investment Forum



This policy area addresses the financing needs of both start-ups and SMEs for which digital innovations make the core of the business model as well as existing enterprises in traditional industries, which can use digital innovations to increase the efficiency of operations.

On their development path, SMEs face different needs and challenges in both – the size and the type of investments – that may help funding the digital innovations and high-risk investments at different lifecycle stages. The goal of a good policy practice is to compensate for weaknesses in the financial markets and increase access to finance for start-ups and SMEs. This explains the logic and the structure of recommendations, covering various types of actors providing external and alternative funding for digital innovations and special knowledge that should accompany high-risk investments.

Alternative finance refers to a range of products emerging outside of traditional banking for businesses that have difficulties in accessing banking loans because of their high-risk business plans (e.g. peer-to-peer lending, crowdfunding, marketplace lending and initial coin offering (ICO)).

**Crowdfunding** is "the practice of funding a project or venture by raising many small amounts of money from a large number of people ("crowd"), typically via the Internet (online platforms)" (Lexico 2014). Crowdfunding platforms in their different models (donation-based, reward-based, equity-based and lending-based) are a new powerful source of alternative funding that make start-ups less dependent on typical venture capital exit models and allow raising funds without a material collateral that is required by banks.

**Business angel (BA) investors** are "high net worth individuals who usually provide smaller amounts of finance at an earlier stage than many venture capital funds are able to invest. They are increasingly investing alongside seed venture capital funds" (WBAF 2019). For Business Angels to operate as a part of international business network is a means of risk-leverage which also helps to increase success rate of investments via better decision making and connection to the next-stage investors.

**Venture capital (VC)** is a form of private equity financing that is provided by venture capital firms or funds to start-ups, early-stage, and emerging companies. Raising up national **venture investors** is a long-term task that includes providing the wealthy citizens with incentives to make risky investments inside the country and training them by well-educated and internationally practiced venture funds managers. The medium-term task is to attract to Georgia the venture investments from abroad, to equip the Georgian start-ups with an opportunity to get funding for their scale-up stage of development, while staying the residents of the country.

**Digital transformation** is understood as "a fusion of advanced technologies and the integration of physical and digital systems, the predominance of innovative business models and new processes, and the creation of smart products and services" [EC]. Objective of the policy on digitising industry is to ensure that businesses of all sizes, location and sectors in Europe can draw the full benefits from digital innovation. If a solid digital transformation implies the revision of a business model, funding of such modernisation becomes too risky for traditional banking loans, and hence new instruments, like loan guarantees, apply.

**High risk digital innovations** are new ideas based on disruptive technologies coupled with business model changes that need quick introduction into the market. Financial resources for such cases need to be open immediately; a 9-month project contest is an extremely unsatisfactory pipeline for digital innovations. Therefore, alternative financing sources are required as per best practises in EU and globally.



# **Overview of the Action Plan**

Key recommendations	Reference to Policy recommendations
1. Enhance the legal framework to create more trusted and empowered environment for alternative finance	
<b>Final goal:</b> Access of start-ups and SMEs to alternative finance (e.g. peer-to-peer lending, crowdfunding, marketplace lending and initial coin offering (ICO)) takes place in a more trusted and accredited environment.	R.1.1R.1.3.
2. Facilitate further development of individual <u>business angels</u> and associations by providing financial incentives, training to select the investment opportunities and integrating them into the EU and global networks	R.3.1R.3.5.;
<b>Final goal:</b> The capacity of business angels to select the investment opportunities is increased, individual business angels and associations are consolidated inside Georgia and integrated with the EU investors networks as well as financial incentives (tax benefits, co-investment schemes, etc.) are introduced for business angels, resulting in increased success rate and improved conditions for their investments.	R.7.2R.7.3.
3. Facilitate further development of <u>venture capital</u> ecosystem by improving venture investment policy and providing training to	
select the investment opportunities	R.4.1R.4.4.;
<b>Final goal:</b> The capacity of investors to select investment opportunities is increased, the venture capital ecosystem in Georgia is strengthened and taxation policy is improved to attract more EU venture investments in Georgia and increase access of Georgian companies to venture investments.	R.7.2R.7.3.
4. Facilitate the development of local <u>crowdfunding</u> platforms through harmonisation of the legal framework for crowdfunding with the EU regulations and supporting their integration with the EU platforms and networks	
<b>Final goal:</b> The legal framework for crowdfunding in Georgia is harmonised with the EU regulations empowering local crowdfunding and peer-to-peer lending platforms to scale up their operations. Integration of Georgian crowdfunding and peer-to-peer lending platforms with the EU platforms and networks is supported.	R.2.1R.2.3.
5. Determine more accessible and inclusive funding opportunities for successful digital transformation of traditional SMEs	
<b>Final goal:</b> The financial framework which includes both public and private financial opportunities for digital transformation of SMEs in non-IT sectors of economy is determined and provided to help the traditional enterprises to perform digital transformation.	R.6.1.
6. Provide the advisory, training, matchmaking and collaboration support for digital innovation SMEs looking for funding	R.5.1R.5.2.;
<b>Final goal:</b> Increased access to finance for digital SMEs from local and international sources. Information and matchmaking platforms connect finance-seeking SMEs with potential providers of public funds, investors and lenders.	R.7.1.; R.8.1 R.8.3.



### **Detailed Action Plan**

Recommendation / Action	Potential activity	Other participants	Indic time	ative eline	Status	Specification	Link to Policy	Comments and			
Recommendation/ Action	owners / leads	(optional)	2020- 2021	2022- 2025	Status	Ореспісацоп	REC	suggestions			
1. Enhance the legal framework to create more trusted and empowered environment for alternative finance  Final goal: Access of start-ups and SMEs to alternative finance (e.g. peer-to-peer lending, crowdfunding, marketplace lending and initial coin offering (ICO)) takes place in a more trusted and accredited environment.											
1.1. Develop communication with the advanced EU organisations on alternative finance regulation for knowledge transfer	NBG; GITA	TBD	х		In progress	Note: NBG is a member of GFIN  Examples: Altfinator; Global Financial Innovation Network; The World Savings and Retail Banking Institute; European Savings and Retail Banking Group; European Forum for Innovation Facilitators (EFIF)	R.1.1.				
1.2. Review the EU member states' practice of the legal framework for alternative finance, including the development of regulatory sandboxes, and consider its application in Georgia	NBG	GITA; Startup Georgia; MoESD; Enterprise Georgia; GNCC	X	x	In progress	Example: ESBG, 2019  Notes:  In following public consultations, NBG adopted a regulatory sandbox framework, which came into force on 25/05/2020. The Rule allows regulated financial institutions to test their innovative products and services in the testing environment. Gradually NBG plans to expand the scope of the sandbox. For example, to crowd funding platforms.  In TAIEX and TWINNING are the EU technical assistance tools that could be supportive in transfer of particular EU policy practices in Georgia by the EU supervision during policy elaboration.	R.1.2.				
1.3. Consider introduction of an accreditation system for alternative finance providers	NBG	Enterprise Georgia; GNCC; GITA		х	In progress	Example: an accreditation (certification) system for institutions and providers of alternative financing administered by the Catalan Agency for Business Competitiveness (ACCIÓ).	R.1.3.				

<sup>2.</sup> Facilitate further development of individual business angels and associations by providing financial incentives, training to select the investment opportunities and integrating them into the EU and global networks

**Final goal:** The capacity of business angels to select the investment opportunities is increased, individual business angels and associations are consolidated inside Georgia and integrated with the EU investors networks as well as financial incentives (tax benefits, co-investment schemes, etc.) are introduced for business angels, resulting in increased success rate and improved conditions for their investments.

Recommendation / Action	Potential activity	Other		cative eline	Status	Specification	Link to Policy	Comments and
Recommendation / Action	owners / leads	participants (optional)	2020- 2021	2022- 2025	Status	Specification	REC	suggestions
2.1. Reactivate the Georgian BA association and its integration to the EU and global networks of investors to support BA in building relations with further investors	GVCA	MoESD; Business associations; GITA; TFIRP	х		In progress	Note: In March 2017, Georgian Business Angels Association was established; however, it is not fully active and was not a member of any international associations.  Examples: Business Angels Europe; The European Trade Association for Business Angels, Seed Funds and Early Stage Market Players (EBAN); World Business Angel Investment Forum	R.3.1.	
2.2. Introduce capacity building programme for individual BAs to enhance capacity of selecting projects for investments	TFIRP (TBD)	Private organisations; GITA	x		In progress	Note: The World Bank /EU Trust fund 'Startup Investors Program' started from January 2020 and implemented by GITA has two components, supporting both supply and demand side of Business Angel investing in Georgia.  Examples of BAs trainings in EU: Altfinator; ESIL Digital Academy; EBAN Knowledge Center; World Business Angel Investment Forum.	R.3.2.; R.7.2.; R.7.3.	
2.3. Consider the transfer of European practice of application of convertible permissible notes and advanced subscription agreements for better BA investments protection and incentives to invest	GITA (TBD)	Private sector organisations; TFIRP; NBG		х	Not started	Possible steps:  1. analyse the European practice (Germany, the UK, etc.) of application of convertible permissible notes and advanced subscription agreements, which are specific types of investments (mezzanine/quasiequity);  2. consider the introduction of definitions and rules;  3. consider transfer to Georgia of model agreements and practices.	R.3.1 R.3.2.	
2.4. Consider introducing tax benefits for BAs to foster their investments	MoF	NBG; GITA	x		Not started	Notes:  consider introducing a definition of BA for the purpose of introducing the taxation framework;	R.3.3 R.3.4.	

Decommondation / Action	Potential activity owners / Other			ative eline	Status	Specification	Link to	Comments and
Recommendation / Action	owners / leads	(optional)	2020- 2021	2022- 2025	Status	Specification	Policy REC	suggestions
						<ul> <li>both Income and capital gains taxation of investors can be considered;</li> <li>different schemes (tax deduction, tax exemption, tax credit, tax deferral, loss relief) can be considered;</li> <li>TAIEX and TWINNING are the EU support tools that could be supportive in transfer of particular EU tax benefits scheme in Georgia by the EU supervision during policy elaboration.</li> </ul>		
2.5. Consider introducing co-investments scheme for BAs complemented with expertise and advice from experienced international investors	MoF	NBG; Enterprise Georgia; MoESD; GITA; Commercial banks; International financial institutions;		x	Not started	<ol> <li>Action steps:         <ol> <li>different schemes in the EU to be analysed;</li> <li>their feasibility and economic effects for Georgia to be assessed and further decision made.</li> </ol> </li> <li>Options:         <ol> <li>this co-investment might be done by a dedicated public fund (from the state budget), or be a private-public fund, or a fund established with assistance of international financial organisations (WB, EIB, USAID);</li> <li>the advisory council could be sought from the EU/international BA communities.</li> </ol> </li> </ol>	R.3.5.	
	vestors to select	investment opportu	nities is i	ncreased	l, the venture	estment policy and providing training to select the capital ecosystem in Georgia is strengthened and to venture investments.		
3.1. Harmonise legislation of venture capital investments in Georgia with the further advanced EU legislation	MoESD	NBG; GITA; Business associations; GVCA ( <i>TBD</i> )	X	X	In progress	Note: The 'Law on Investment Funds' has been prepared which inter alia introduces the framework for an Authorized investment fund (Undertaking for collective investment in transferable securities (UCITS) or retail investment fund) and incorporates main principles of AIFD directive. It is already submitted to parliament for approval. Venture capital and private equity funds will be covered	R.4.1.; R.4.3.	

Recommendation / Action	Potential activity	Other participants		ative eline	Status	Specification	Link to Policy	Comments and
Recommendation / Action	owners / leads	(optional)	2020- 2021	2022- 2025	-	Specification	REC	suggestions
						by this law as well. Once the law is approved, the relevant regulatory package will be issued for public consultation. The investment fund legal/regulatory framework (including venture capital) is supported by number of IFIs.		
3.2. Perform analysis of other competing jurisdictions comparing with the current Georgian policy for venture investments taxation to identify required adjustments	MoF; GITA; MoESD	NBG	x		In progress	Note: The legal package contains investment tax framework under the investment fund law that is submitted to parliament for approval.	R.4.2.	
3.3. Consider introducing the national co-investments scheme for venture capital investments into digital innovations	GITA	NBG; MoF (TBD)		X	Not started	Possible steps:  1. prioritising the areas to be supported by coinvesting; 2. setting up the operating body; 3. allocating budget; 4. in a medium-term, the list of EU coinvestment mechanisms is recommended to be used.	R.4.4.	
3.4. Introduce capacity building programme for individual venture capital investors and fund managers to enhance capacity of selecting projects for investments	GITA; TFIRP	NBG; Private sector organisations	x		Not started	Possible steps:  1. inventorise training opportunities, decision-making tools, and other capacity building opportunities across the world;  2. promote opportunities;  3. develop national training programmes based on the best global trainings' practices (optional).  Examples of VCs programmes:  Altfinator; Venture University, i.e. The VC/PE Investment Apprenticeship Track; ESIL (Early stage investing Launchpad); InnoRate project.	R.7.2.; R.7.3.	

<sup>4.</sup> Facilitate the development of local crowdfunding platforms through harmonisation of the legal framework for crowdfunding with the EU regulations and supporting their integration with the EU platforms and networks

Recommendation / Action	Potential activity owners / leads	Other participants (optional)	time	eative eline 2022-	Status	Specification	Link to Policy REC	Comments and suggestions
	ework for crowd					lations empowering local crowdfunding and peer-to th the EU platforms and networks is supported.	-peer lendi	ing platforms to scale
4.1. Consider the introduction of legislation on crowd and peer to peer finance service providers in Georgia	GITA; NBG	TBD	X		In progress	Note:  NBG has started to analyse crowdfunding regulatory frameworks of different countries, including EU regulations, and considers in cooperation with GITA to adopt a draft regulation for crowdfunding service providers. NBG is ready to use regulatory sandbox and its outcomes to develop regulatory approach.  Possible steps:  1. perform analysis of the EU regulatory framework on crowd and peer to peer finance service providers, including:  a. legislative proposal for an EU framework on crowd and peer to peer finance adopted by Commission on 8 March 2018  (COM(2018)113/DOCUMENT-2018-31146);  b. the Proposal for a Regulation of the European Parliament and of the Council on European Crowdfunding Service Providers (ECSP) for Business (COM/2018/0113 final - 2018/048 (COD).  2. consider its potential application in Georgia with attention to crowd investing (equity-based) and P2P lending (loan-based).	R.2.1.	
4.2. Register the Georgian crowdfunding platforms to international networks and platforms to increase the global visibility of investment opportunities and attract	NBG	National Start- up Association		х	Not started	Examples: P2P Market Data; European Crowdfunding Network  Possible steps: 1. identify platforms and networks; 2. promote the registration opportunities among GE crowdfunding platform.	R.2.2.	

Recommendation / Action	Potential activity	Other participants		ative eline	Status	Specification	Link to Policy	Comments and
	owners / leads	(optional)	2020- 2021	2022- 2025	Status	Specification	REC	suggestions
additional funds through crowdfunding platforms								
4.3. Facilitate joining Georgian crowdfunding platform management to the EU professional networks	NBG	Business associations		Х	Not started	Examples of networks: European Crowdfunding Network; Crowd Fund Portal	R.2.3.	
4.4. Promote crowdfunding to raise level of trust to such kind of investments	National Start-up Association	TBD	x		Not started	Examples: Best Practice Crowdfunding Campaigns; A Framework to promote crowdfunding; ECN Library; P2P Academy	R.2.2 R.2.3.	

#### 5. Determine more accessible and inclusive funding opportunities for successful digital transformation of traditional SMEs

**Final goal:** The financial framework which includes both public and private financial opportunities for digital transformation of SMEs in non-IT sectors of economy is determined and provided to help the traditional enterprises to perform digital transformation.

5.1. Revise the financial support framework for digital transformation of traditional SMEs	MoESD; GITA	Enterprise Georgia; Information Technology Association of Georgia	X	x	In progress	Possible steps:  1. the classification of digital transformation processes and loan allocation rules of COSME Loan Guarantee Facility should be applied;  2. addressing the gaps not covered by existing funding sources for SMEs (for all enterprises: internal processes, innovative business models; for state-owned enterprises: supply chain management and business development; for private enterprises: product/service innovations, customer relationships; security and digitals skills and training).  Notes:  mapping of the available sources of funding from state, international financial organisations, etc. that are available to SMEs covering various types of digital transformation activities was performed by EU4D Facility;	R.6.1.	
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Recommendation / Action	Potential activity	Other participants		cative eline	Status	Specification	Link to Policy	Comments and
Recommendation / Action	owners / leads	(optional)	2020- 2021	2020- 2022-	Status	Specification	REC	suggestions
						<ul> <li>the support can include both public support mechanisms (grants, innovation vouchers, state guarantees, tax incentives) and negotiated instruments of support from international (financial) organisations as well as private financial sector;</li> <li>potential donor organisations: EIB, EIF, WB.</li> </ul>		
5.2. Localise the recommendations in other relevant ICT Innovation intervention areas (developed for other Eastern partner countries by EU4Digital Facility) in order to support digital transformation of SMEs	TBD	GITA; MOESD	x		Not started	Notes:  For example, analyse and adjust the topic 'Digitising industry (digital transformation of SMEs in traditional sectors)'.  To support digital transformation of SMEs, a set of complementary issues are recommended to be covered:  the resource base for digital transformation apart from the funding, including network of specialised competence centres, specialised digital innovation and entrepreneurial education organisation, digital platforms and digital industrial (sectoral) platforms, etc.;  policy and organisational setup for digital transformation in the country, including organisational mechanisms and practices for discussions and joint work of diverse stakeholders;  mapping the outcomes of digital transformation.	NA	
5.3. Consider establishing cross border copiloting and cofinancing schemes for digital transformation	TBD	GITA		х		Possible steps: 1. establish a specialised fund, its governance and operating model; 2. negotiate partnership with international limited partners; 3. develop the investment policy (one of criteria: pilots should be able to be implemented in different jurisdictions (the EU and Georgia/the EaP) and by different	N/A	

Recommendation / Action	owners / (optional)		time	ative eline	Status	Specification	Link to Policy	Comments and
leads		(optional)	2020- 2021	2022- 2025			Policy Suggestion	suggestions
						instruments (minority equity investments, up to 30%; seed and early growth stage start-ups); 4. enhance the fund governance with experts in different industries/sectors; 5. support enterprises by co-funding, matchmaking, legal advice, etc; 6. establish a promotion programme for EU companies to co-pilot the digital transformation solutions.		

### 6. Provide the advisory, training, matchmaking and collaboration support to digital innovation SMEs looking for funding

Final goal: Increased access to finance for digital SMEs from local and international sources. Information and matchmaking platforms connect finance-seeking SMEs with potential providers of public funds, investors and lenders.

6.1. Develop and update an online freely accessible database accumulating the necessary information about national funding possibilities for digital innovations for start-ups, SMEs and public organisations	NBG; GITA; Startup Association	Enterprise Georgia; Startup Georgia; Commercial banks; Fintechs	x	x	In progress	<ul> <li>Note:</li> <li>EU4Digital Facility has identified the wide list of funding opportunities on the national level.</li> <li>Possible steps:</li> <li>1. identify the funding opportunities (update national sources, add international sources, both private and public);</li> <li>2. develop the tool for publishing the funding opportunities, including a unified structure for presenting the data, APIs for automatic update (optional), and other functionalities (e.g. matchmaking SMEs and investors);</li> <li>3. maintain and operate the platform and promote its usage.</li> </ul>	R.5.1.; R.8.1.; R.8.3.	NBG could use its Financial Innovation Office to post relevant information just for Fintech firms.
6.2. Facilitate joining the existing matchmaking platforms in the EU connecting finance-seeking SMEs with private investors and lenders	GITA	NBG; Enterprise Georgia; Startup Georgia	x		Not started	Examples of EU platforms: <a href="https://www.euroquity.com/">https://www.euroquity.com/</a> , Dealroom, EuropeanStartups	R.8.2.	The EU partner is needed – EU delegation or other sources.
6.3. Promote wider usage of the available EU	GITA	Private sector organisations	Х	Х	In progress	Possible steps:	R.5.2.	The EU partner is needed – EU

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Recommendation / Action	owners / leads	participants (optional)	2020- 2021	2022- 2025	Status	Specification	Policy REC	suggestions
public funding opportunities						collect the list of the EU funding opportunities for digital innovations for which Georgia is eligible;     promote it via public agencies, trade chambers; business associations, NGOs.      Examples of EU funding opportunities:  EIC Pathfinder, Accelerator, FTI, InnovFin		delegation or other sources.
6.4. Consider the possibilities to shorten the application review process for fast track support of high-risk innovations and social innovations	GITA	NBG; Commercial bank; Fintechs		х	Not started	Possible steps:  1. study the scheme of the EU financial fast track instruments' operational mechanism and decision-making process;  2. consider implementing them in Georgia with account of currently applied WB guidelines.  Example: the UK Small and Medium Sized Business (Finance Platforms) Regulations.	R.5.1.	Funding organisation might consider criteria to fast track if Fintech is accepted in the Regulatory Sandbox of NBG
6.5. Launch national training programmes for start-ups and SMEs to attract business angel and venture funding and other types of alternative funding	GITA; Business Accelerator Spark; TFIRP	Entrepreneurial training providers; National Start- up Association; Business associations	Х	Х	In progress	Note: The World Bank/EU Trust fund 'Startup Investors Program' started in January 2020 and implemented by GITA has two components, supporting both supply and demand side of Business Angel investing in Georgia.	R.7.1.	