

# The Disciplining Effect of Bank Supervision: Evidence from SupTech

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Note: The views expressed in this project are those of the authors and do not necessarily reflect those of the Banco Central do Brasil or the Bank for International Settlements.

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  - Despite the use of SupTech by supervisory agencies around the world, **research is scant**
- **We address this research gap using unique SupTech data from the Central Bank of Brazil**

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  - ② **banks’ corporate lending decisions**
  - ③ **firms’ outcomes**
- We employ **difference-in-differences models** to compare the outcomes of treated (versus non-treated) banks before (versus after) a SupTech event

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- 3 SupTech events generate **spillovers to the real economy**
  - Less creditworthy firms borrowing from treated banks are adversely affected
- We provide evidence that these findings can be explained by a **supervisory scrutiny channel**

# Contribution

- ① **The real effects of regulatory enforcement in the banking sector** (Abbassi et al., 2024; Bonfim et al., 2022; Cortés et al., 2020; Danisewicz et al., 2018; Fuster et al., 2021; Granja and Leuz, 2018; Haselmann et al., 2023; Hirtle et al., 2020; Kandrac and Schlusche, 2021; Kok et al., 2023; Passalacqua et al., 2022; Roman, 2016)
  - The effect of SupTech
- ② **The design of supervisory frameworks in the banking sector** (Agarwal et al., 2014; Carletti et al., 2021; Eisenbach et al., 2022; Ganduri, 2018; Haselmann et al., 2023; Lucca et al., 2014)
  - The effect of formal (punitive) versus informal (non-punitive) regulatory enforcement

## Institutional setting

Data

The effect on banks' balance sheet

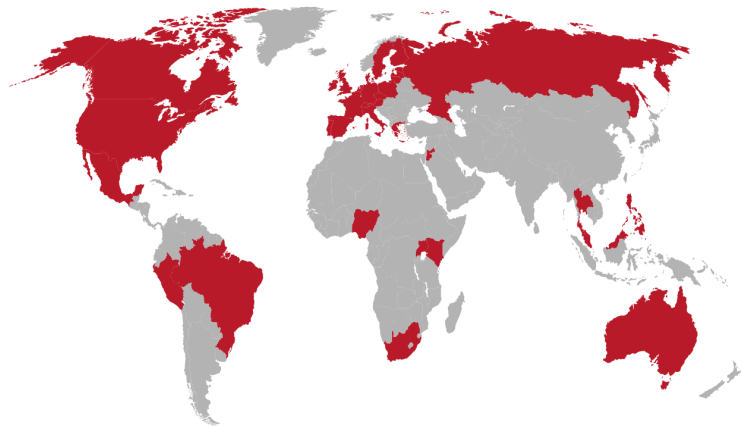
The effect on banks' lending behavior

The effect on firms' outcomes

Conclusion

- SupTech = innovative technologies used by supervisory agencies to support the conduct of bank supervision (BIS, 2018b)
- In the 1990s, SupTech was primarily used by advanced economies and limited to financial ratio analyses **Examples**
- In recent years, SupTech has become a key priority for many supervisory agencies around the world and increasingly data-oriented (FSB, 2020)
  - Data collection
  - Data processing

## SupTech around the world

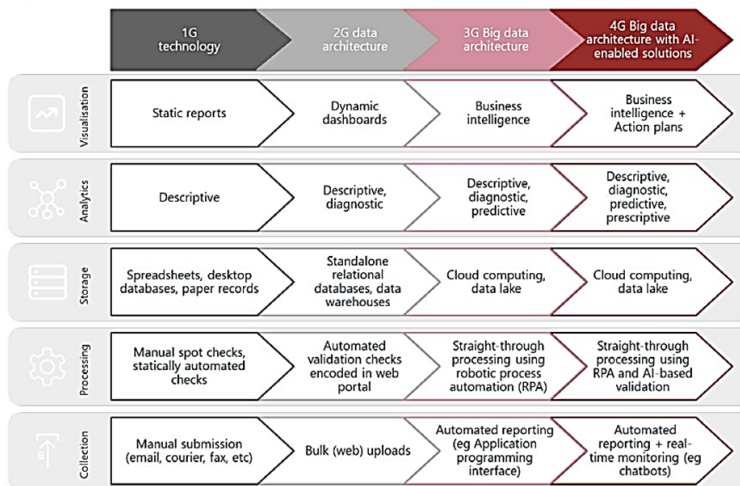


(a) Countries with SupTech initiatives in 2019 in red (source: [Di Castri et al., 2019](#))

## SupTech: Drivers?

- 1 The global financial crisis, which highlighted the need for more proactive and hypothesis-driven supervision ([World Bank, 2021](#))
- 2 Recent improvements in technological capabilities, including data storage capacity, computer processing power, availability and usability of data, and advances in artificial intelligence

# SupTech: different generations



(a) SupTech classification (source: Di Castri et al., 2019)



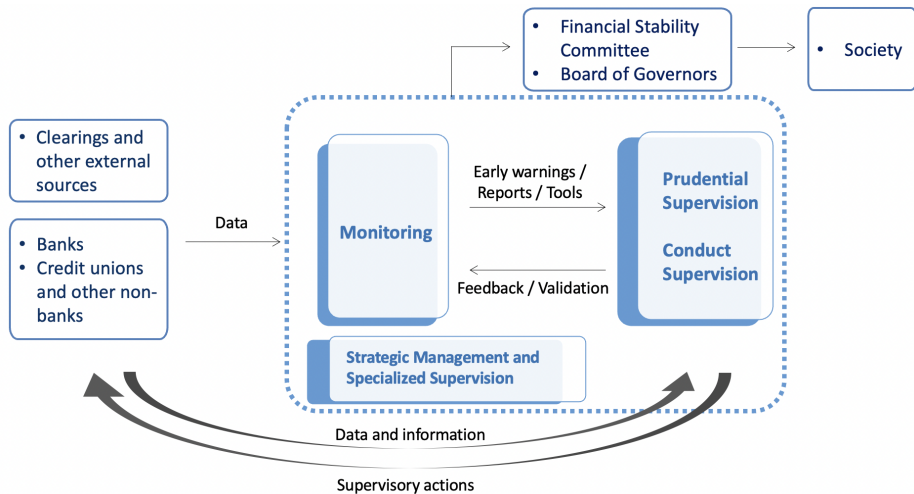
## Central Bank of Brazil (BCB): SupTech within supervisory framework

- BCB supervises financial institutions (banks and non-banks (e.g., credit unions))
- BCB relies on both on-site and off-site monitoring of financial institutions
  - On-site bank inspections
  - Off-site SupTech application – generates “automatic alerts” (“SupTech events”)

## Central Bank of Brazil: SupTech application

- The SupTech application from the BCB automatically analyzes banks' on- and off-balance sheet positions from 3 different perspectives (temporal, comparative, and intrinsic) **Example**
- The application can generate “automatic alerts” that suggest the need for further investigation to the supervisory departments
  - Human intervention remains indispensable (**BIS, 2018b**)
- In general, this leads to “more focused supervision that allows the supervisor to act more preemptively” (**BCB, 2022**)
  - This differs from other regulatory enforcement actions, such as bank sanctions and on-site bank inspections

# Central Bank of Brazil: Supervisory framework



Institutional setting

**Data**

The effect on banks' balance sheet

The effect on banks' lending behavior

The effect on firms' outcomes

Conclusion

- SupTech data [Details](#)
  - Bank data [Details](#)
  - Loan data [Details](#)
  - Firm data [Details](#)
- The ultimate dataset covers 1,325 financial institutions (including 221 treated institutions) and 870,000 firms over the period 2008-2021

Institutional setting

Data

**The effect on banks' balance sheet**

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Conclusion

- First, we study how SupTech events affect banks' balance sheets:

$$y_{b,t} = \beta^{ATE} Post\ SupTech_{b,t} + \delta \mathbf{X}_{b,t-1} + \alpha_b + \alpha_t + \epsilon_{b,t} \quad (1)$$

where  $\beta^{ATE}$  captures the difference in the outcome variable of treated (versus non-treated) banks after (versus before) a SupTech event

## Results

- Banks reclassify loans as problem loans (NPL) and increase loan loss provisions (LLP)

|                         | (1)                   | (2)                  | (3)                      |
|-------------------------|-----------------------|----------------------|--------------------------|
|                         | NPL/TA                | LLP/TA               | LLP <sub>risky</sub> /TA |
| Post SupTech            | 0.0060***<br>(0.0020) | 0.0014**<br>(0.0006) | 0.0044***<br>(0.0014)    |
| Observations            | 100,194               | 99,257               | 99,257                   |
| Adjusted R <sup>2</sup> | 0.6751                | 0.5398               | 0.6326                   |
| Controls                | Yes                   | Yes                  | Yes                      |
| Bank FE                 | Yes                   | Yes                  | Yes                      |
| Time FE                 | Yes                   | Yes                  | Yes                      |

→ Treated banks increase LLP by 20% for risky loans



## Results

- There is no (statistically significant) impact on bank capital (Capital), profitability (ROA), or credit (Loans)

|                         | (4)                 | (5)                 | (6)                |
|-------------------------|---------------------|---------------------|--------------------|
|                         | Capital/TA          | ROA                 | Loans/TA           |
| Post SupTech            | -0.0055<br>(0.0066) | -0.0036<br>(0.0029) | 0.0030<br>(0.0069) |
| Observations            | 99,257              | 54,833              | 99,257             |
| Adjusted R <sup>2</sup> | 0.8644              | 0.5657              | 0.8966             |
| Controls                | Yes                 | Yes                 | Yes                |
| Bank FE                 | Yes                 | Yes                 | Yes                |
| Time FE                 | Yes                 | Yes                 | Yes                |

# Robustness

- A potential concern is that our results are due to the non-random assignment of the SupTech events
- To alleviate this concern, we use four methods to ensure that our estimates are well-identified:
  - Parallel trends assumption [Details](#)
  - Propensity score matching [Details](#)
  - Falsification tests [Details](#)
  - Alternative estimator [Details](#) ([Baker et al., 2022](#))

# Channel

- The literature has proposed 3 channels through which bank supervision can affect banks' balance sheets:
  - ① Capital channel
  - ② Market discipline channel
  - ③ Supervisory scrutiny channel (moral suasion)

## Supervisory scrutiny channel: The types of SupTech events

- First, we show that the effects are stronger for SupTech events related to regulatory non-compliance
  - These events are the ones that allow banks to learn about regulators' supervisory views

## Supervisory scrutiny channel: The types of SupTech events

|                                    | (1)                     | (2)                     | (3)                      |
|------------------------------------|-------------------------|-------------------------|--------------------------|
|                                    | NPL/TA                  | LLP/TA                  | LLP <sub>risky</sub> /TA |
| Post SupTech <sub>regulatory</sub> | 0.00810***<br>(0.00225) | 0.00178***<br>(0.00064) | 0.00544***<br>(0.00159)  |
| Post SupTech <sub>reporting</sub>  | 0.00267<br>(0.00375)    | 0.00009<br>(0.00109)    | 0.00059<br>(0.00247)     |
| Observations                       | 101,194                 | 99,257                  | 99,257                   |
| Adjusted R-squared                 | 0.63737                 | 0.53892                 | 0.63206                  |
| Bank FE                            | Yes                     | Yes                     | Yes                      |
| Time FE                            | Yes                     | Yes                     | Yes                      |

The length of SupTech events

## Supervisory scrutiny channel: Within-municipality spillovers

- Second, we show that SupTech events have within-municipality spillovers on non-treated banks
  - This suggests that SupTech has a “deterrence effect” (Colonnelli and Prem, 2022; Pomeranz, 2015; Rincke and Traxler, 2011)

## Supervisory scrutiny channel: Within-municipality spillovers

|                    | (1)                  | (2)                  | (3)                             |
|--------------------|----------------------|----------------------|---------------------------------|
|                    | NPL/TA               | LLP/TA               | LLP <sub>risky</sub> /TA        |
| Post × Treated     | 0.0033**<br>(0.0015) | 0.0013**<br>(0.0006) | 0.0015 <sup>†</sup><br>(0.0009) |
| Observations       | 66,220               | 62,323               | 62,323                          |
| Adjusted R-squared | 0.6505               | 0.5554               | 0.6361                          |
| Controls           | Yes                  | Yes                  | Yes                             |
| Bank FE            | Yes                  | Yes                  | Yes                             |
| Time FE            | Yes                  | Yes                  | Yes                             |

(Sample: non-treated banks)

$$y_{b,c,t} = \gamma Post \times Treated_{c,t} + \delta \mathbf{X}_{b,t-1} + \alpha_b + \alpha_t + \epsilon_{b,c,t} \quad (2)$$

where  $Post \times Treated_{c,t}$  is equal to one after another bank operating in municipality  $c$  was treated

## In a nutshell

- We find that SupTech events induce financial institutions to reveal unreported credit risks, in line with an informational disclosure effect (Delis et al., 2018; Bonfim et al., 2022; Passalacqua et al., 2022)
- These results can be rationalized by a supervisory scrutiny channel



Institutional setting

Data

The effect on banks' balance sheet

**The effect on banks' lending behavior**

The effect on firms' outcomes

Conclusion

## Bank lending: possible channels

- Second, we study the effect of SupTech events on banks' lending behavior
- The literature has proposed 2 potential channels through which bank supervision can affect bank lending ([Granja and Leuz, 2018](#)):
  - ① Capital shock channel
  - ② Reallocation channel

## Bank Lending: Methodology

- We first test the capital shock channel:

$$\Delta \text{Credit}_{f,b,t} = \beta^{ATE} \text{Post SupTech}_{b,t} + \delta \mathbf{X}_{f,b,t-1} + \alpha_{f,t} + \alpha_{b,f} + \epsilon_{f,b,t} \quad (3)$$

with  $\Delta \text{Credit}_{f,b,t} = \frac{\text{Credit}_{f,b,t} - \text{Credit}_{f,b,t-1}}{0.5 \times (\text{Credit}_{f,b,t} + \text{Credit}_{f,b,t-1})}$  (Davis and Haltiwanger, 1992)

# Results

- On average, we do not find a change in credit supply

|                | (1)                 | (2)                | (3)                | (4)                |
|----------------|---------------------|--------------------|--------------------|--------------------|
|                | Credit growth       | Credit growth      | Credit growth      | Credit growth      |
| Post SupTech   | -0.0005<br>(0.0330) | 0.0004<br>(0.0305) | 0.0138<br>(0.0270) | 0.0144<br>(0.0362) |
| Observations   | 10,478,565          | 10,466,282         | 5,371,450          | 5,243,909          |
| R-squared      | 0.0842              | 0.0845             | 0.4239             | 0.4976             |
| Controls       | No                  | Yes                | Yes                | Yes                |
| Bank FE        | Yes                 | Yes                | Yes                | No                 |
| Firm FE        | Yes                 | Yes                | No                 | No                 |
| Time FE        | Yes                 | Yes                | No                 | No                 |
| Firm × Time FE | No                  | No                 | Yes                | Yes                |
| Bank × Firm FE | No                  | No                 | No                 | Yes                |

- We then extend the previous model to test the reallocation channel:

$$\Delta Credit_{f,b,t} = \beta^{ATE} (Post\ SupTech_{b,t} \times Credit\ risk_{f,b,t-1}) + \delta \mathbf{X}_{f,b,t-1} + \alpha_{b,t} + \alpha_{f,t} + \alpha_{b,f} + \epsilon_{f,b,t} \quad (4)$$

where  $Credit\ risk_{f,b,t}$  is a dummy variable equal to 1 if a borrower has a bad credit (*Subprime*) rating or has outstanding payments in arrears (*Arrears*)

# Results

- We do find a reallocation in credit supply

|                         | (1)                    | (2)                    | (3)                   | (4)                    |
|-------------------------|------------------------|------------------------|-----------------------|------------------------|
|                         | Credit growth          | Credit growth          | Credit growth         | Credit growth          |
| Panel A:                |                        |                        |                       |                        |
| Post SupTech × Arrears  | -0.0386***<br>(0.0136) | -0.0604***<br>(0.0199) | -0.0341**<br>(0.0163) | -0.0542***<br>(0.0199) |
| R-squared               | 0.0868                 | 0.4260                 | 0.5023                | 0.4434                 |
| Panel B:                |                        |                        |                       |                        |
| Post SupTech × Subprime | -0.0421<br>(0.0248)    | -0.0583**<br>(0.0296)  | -0.0499*<br>(0.0294)  | -0.0538*<br>(0.0315)   |
| R-squared               | 0.0903                 | 0.4245                 | 0.5013                | 0.4420                 |
| Observations            | 10,219,038             | 5,196,395              | 5,069,598             | 5,189,108              |
| Controls                | Yes                    | Yes                    | Yes                   | Yes                    |
| Bank FE                 | Yes                    | Yes                    | No                    | No                     |
| Firm FE                 | Yes                    | No                     | No                    | No                     |
| Time FE                 | Yes                    | No                     | No                    | No                     |
| Bank × Time FE          | No                     | No                     | No                    | Yes                    |
| Firm × Time FE          | No                     | Yes                    | Yes                   | Yes                    |
| Bank × Firm FE          | No                     | No                     | Yes                   | No                     |

- After a SupTech event, treated banks also increase interest rates and reduce the maturity of loans granted to less creditworthy borrowers [Details](#)
- The results are robust to a set of additional checks:
  - Parallel trends assumption [Details](#)
  - Falsification tests [Details](#)

## In a nutshell

- SupTech events reduce bank lending to less creditworthy firms (Delis et al., 2017; Bonfim et al., 2022)
- These results are consistent with a reallocation channel, indicating that SupTech events reduce banks' risk-taking and enhance banks' loan portfolio quality



Institutional setting

Data

The effect on banks' balance sheet

The effect on banks' lending behavior

**The effect on firms' outcomes**

Conclusion

## Methodology for firms' outcomes

- Third, we study whether SupTech events generate spillover effects to the real economy (based on firms' exposure to treated banks)
- We test this using the following regression model:

$$y_{f,t} = \beta_1 Post_{f,t} + \beta_2 Exposure_{f,t-1} + \beta^{ATE} (Post_{f,t} \times Exposure_{f,t-1}) + \delta \mathbf{X}_{f,t-1} + \alpha_f + \alpha_{j,t} + \alpha_{m,t} + \epsilon_{f,t} \quad (5)$$

$$\text{with } Exposure_{f,t-1} = \frac{\sum_{i=1}^{N_{treated}} Exposure_{f,b,t-1} \times Treated_b}{\sum_{i=1}^{N_{all}} Exposure_{f,b,t-1}}$$

# Results

- There are some spillover effects for less creditworthy firms

|  | (1)                  | (2)                  | (3)                   | (4)                   |
|--|----------------------|----------------------|-----------------------|-----------------------|
|  | $\Delta$ Credit      | $\Delta$ Employment  | $\Delta$ Revenue      | $\Delta$ Productivity |
| Panel A:                                 |                      |                      |                       |                       |
| Post $\times$ Exposure $\times$ Arrears  | -0.0349*<br>(0.0201) | -0.0081*<br>(0.0041) | -0.0093<br>(0.0120)   | -0.0025<br>(0.0121)   |
| R-squared                                | 0.1329               | 0.1903               | 0.1393                | 0.0950                |
| Panel B:                                 |                      |                      |                       |                       |
| Post $\times$ Exposure $\times$ Subprime | 0.0174<br>(0.0150)   | -0.0056<br>(0.0055)  | -0.0544**<br>(0.0259) | -0.0529*<br>(0.0272)  |
| R-squared                                | 0.1340               | 0.1902               | 0.0844                | 0.0950                |
| Observations                             | 2,581,598            | 2,466,176            | 2,664,410             | 2,493,510             |
| Controls                                 | Yes                  | Yes                  | Yes                   | Yes                   |
| Firm FE                                  | Yes                  | Yes                  | Yes                   | Yes                   |
| Industry $\times$ Time FE                | Yes                  | Yes                  | Yes                   | Yes                   |
| Municipality $\times$ Time FE            | Yes                  | Yes                  | Yes                   | Yes                   |

## In a nutshell

- SupTech events generate small spillover effects to less creditworthy firms
- These firms cannot compensate the reduction in credit from treated banks, leading to a reduction in firm performance

Institutional setting

Data

The effect on banks' balance sheet

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The effect on firms' outcomes

**Conclusion**

## Conclusion

- **Supervisors increasingly rely on SupTech** to identify banks where weaknesses are most likely to be found
- We provide **novel insights** that SupTech can help to **improve banks' risk reporting** and **reduce risk-taking in bank lending**
- Our findings warrant further research into SupTech, and its role in the **optimal design of supervisory frameworks**

Thank you!

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# Appendix

# Historical SupTech applications

**Table 1: Supervisory risk assessment and early warning systems in selected G10 countries**

| Country        | Supervisory Authority             | System  | Year of implementation           | System type  |
|----------------|-----------------------------------|---|----------------------------------|--|
| France         | Banking Commission                | ORAP<br>(Organisation and Reinforcement of Preventive Action) | 1997                             | Off-site<br>Supervisory bank rating system                     |
|                |                                   | SAABA<br>(Support System for Banking Analysis)                | 1997                             | Early warning model -<br>Expected loss                         |
| Germany        | German Federal Supervisory Office | BAKIS (BAKred Information System)                             | 1997                             | Financial ratio and peer group analysis system                 |
| Italy          | Bank of Italy                     | PATROL  | 1993                             | Off-site<br>Supervisory bank rating system                     |
|                |                                   | Early Warning System  | Planned                          | Early warning model - failure and timing to failure prediction |
| Netherlands    | Netherlands Bank                  | (RAST) Risk Analysis Support Tool                             | 1999                             | Comprehensive bank risk assessment system                      |
|                |                                   | Observation system  | Planned                          | Financial ratio and peer group analysis system                 |
| United Kingdom | Financial Services Authority      | RATE (Risk Assessment, Tools of Supervision and Evaluation)   | 1998                             | Comprehensive bank risk assessment system                      |
|                | Bank of England                   | TRAM (Trigger Ratio Adjustment Mechanism)                     | Developed 1995 – not implemented | Early warning model  |
| United States  | All three supervisory authorities | CAMELS  | 1980                             | On-site examination rating                                     |
|                | Federal Reserve System            | Individual Bank Monitoring Screens                            | 1980s                            | Financial ratio analysis                                       |
|                |                                   | SEER Rating<br>(System for Estimating Exam Ratings)           | 1993                             | Early warning model -<br>Rating estimation                     |
|                |                                   | SEER Risk Rank  | 1993                             | Early warning model-<br>Failure prediction                     |
|                | FDIC                              | CAEL  | 1985 (withdrawn December 1999)   | Off-site supervisory bank rating system                        |
|                |                                   | GMS – Growth Monitoring System                                | mid 1980s (refined recently)     | Simple early warning model -<br>tracking high growth banks     |
|                |                                   | SCOR<br>(Statistical CAMELS Off-site Rating)                  | 1995                             | Early warning model -<br>Rating downgrade estimation           |
|                | OCC                               | Bank Calculator   | Planned                          | Early warning model<br>Failure prediction                      |

## Central Bank of Brazil (BCB) ADAM

*Tool classification:* Risk identification

*Tool description:* The BCB is using ADAM to examine the entire credit portfolio of a supervised firm and identify credit exposures with inadequately recognised expected loss (EL).

*Supervisory use and deployment:* The BCB requires banks to classify credit exposures based on their EL ranges. ADAM identifies credit exposures with high ELs (ie 50-100%) but that banks incorrectly classified.

ADAM has impressive scale and results in a huge time gain. It can analyse 3 million exposures to customers in just 24 hours, while a team of 10 experienced inspectors would take 30 years to do the same. ADAM was first used by non-banking supervision teams and then increasingly used for banking supervision. Now all inspectors have access to it and can continuously enhance it.

ADAM was initially trained using data from credit portfolio analyses by inspectors in 2015 (and also some in 2013 and 2014). Training data are regularly updated with field inspection data.

*Status:* Operational

*Who developed?* Internally developed



## Summary statistics

Summary statistics: Bank data

|                          | N       | Mean   | SD    | Min    | Max    |
|--------------------------|---------|--------|-------|--------|--------|
| ln(TA)                   | 131,928 | 18.824 | 2.469 | 13.604 | 25.213 |
| Loans/TA                 | 131,928 | 0.532  | 0.243 | 0.000  | 0.958  |
| Deposits/TA              | 131,928 | 0.482  | 0.264 | 0.000  | 0.807  |
| Liquidity/TA             | 131,928 | 0.334  | 0.213 | 0.020  | 0.957  |
| Capital/TA               | 131,928 | 0.261  | 0.218 | 0.040  | 0.930  |
| NPL/TA                   | 131,928 | 0.036  | 0.036 | 0.000  | 0.198  |
| LLP/TA                   | 131,928 | 0.011  | 0.012 | 0.000  | 0.123  |
| LLP <sub>risky</sub> /TA | 131,928 | 0.023  | 0.024 | 0.000  | 0.117  |
| ROA                      | 62,267  | 0.022  | 0.040 | -0.114 | 0.184  |
| Treated                  | 131,928 | 0.211  | 0.410 | 0.000  | 1.000  |

## Summary statistics

Summary statistics: Bank data

|                          | Non-treated |       | Treated |       | Difference |
|--------------------------|-------------|-------|---------|-------|------------|
|                          | Mean        | SD    | Mean    | SD    |            |
| ln(Total assets)         | 18.678      | 2.267 | 19.768  | 2.214 | 1.090***   |
| Deposits/TA              | 0.489       | 0.267 | 0.474   | 0.292 | -0.015***  |
| Loans/TA                 | 0.536       | 0.239 | 0.522   | 0.258 | -0.014***  |
| Equity/TA                | 0.265       | 0.205 | 0.244   | 0.198 | -0.021***  |
| ROA                      | 0.030       | 0.038 | 0.023   | 0.033 | -0.007***  |
| NPL/TA                   | 0.033       | 0.037 | 0.041   | 0.044 | 0.008***   |
| LLP/TA                   | 0.012       | 0.016 | 0.012   | 0.015 | 0.000      |
| LLP <sub>risky</sub> /TA | 0.023       | 0.023 | 0.027   | 0.026 | 0.004***   |
| Liquid assets/TA         | 0.358       | 0.198 | 0.340   | 0.211 | -0.017***  |
| Observations             | 114,962     |       | 30,178  |       | 145,140    |

## Summary statistics

Summary statistics: Loan data

|                  | N          | Mean   | SD    | Min    | Max    |
|------------------|------------|--------|-------|--------|--------|
| Credit growth    | 15,630,592 | -0.028 | 0.473 | -2.000 | 2.000  |
| Collateral       | 15,630,592 | 0.607  | 0.489 | 0.000  | 1.000  |
| ln(Amount)       | 15,630,592 | 10.363 | 1.969 | 0.010  | 26.047 |
| ln(Rate)         | 15,630,592 | 2.506  | 2.924 | -4.605 | 5.521  |
| ln(Maturity)     | 15,630,592 | 2.811  | 1.271 | 0.000  | 7.375  |
| N(Relationships) | 15,630,592 | 2.235  | 1.715 | 1.000  | 31.000 |
| Subprime         | 15,630,592 | 0.133  | 0.340 | 0.000  | 1.000  |
| Arrears          | 15,630,592 | 0.206  | 0.404 | 0.000  | 1.000  |



## Summary statistics

Summary statistics: Firm data

|                                   | N         | Mean   | SD    | Min     | Max    |
|-----------------------------------|-----------|--------|-------|---------|--------|
| $\Delta \ln(\text{Credit})$       | 8,603,946 | 0.008  | 0.664 | -2.991  | 3.891  |
| $\Delta \ln(\text{Employment})$   | 3,685,596 | 0.000  | 0.207 | -0.977  | 1.203  |
| $\Delta \ln(\text{Wage/hour})$    | 3,684,614 | 0.011  | 0.073 | -0.409  | 0.655  |
| $\Delta \ln(\text{Hours worked})$ | 3,685,596 | -0.001 | 0.270 | -1.244  | 1.592  |
| $\Delta \ln(\text{Revenue})$      | 4,649,900 | 0.035  | 1.318 | -13.106 | 13.700 |



## Summary statistics

Table: Distribution of treated vs. non-treated banks

|             | Frequency | Percentage | Cumulative Percentage |
|-------------|-----------|------------|-----------------------|
| Treated     | 221       | 16.86      | 16.86                 |
| Non-treated | 1,104     | 83.32      | 100.00                |
| Total       | 1,325     | 100.00     |                       |



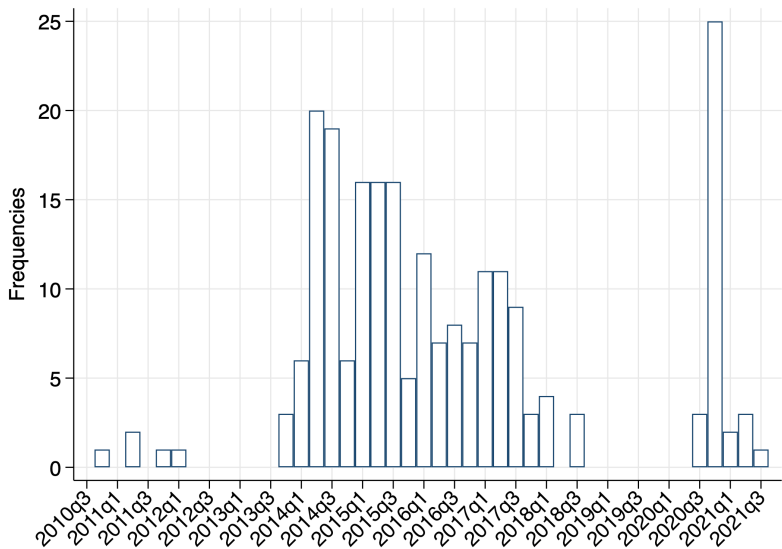
## Summary statistics

Table: Number of SupTech events per treated bank

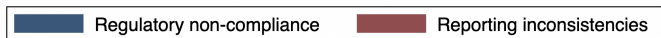
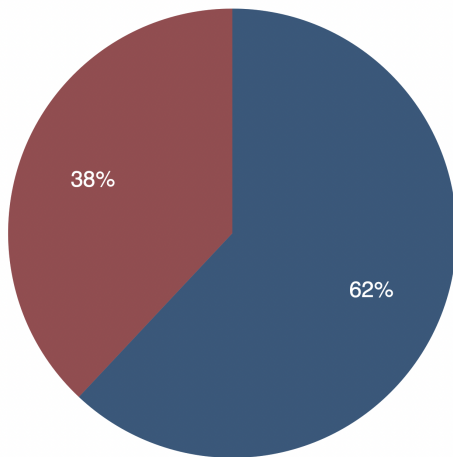
|       | Frequency | Percentage | Cumulative Percentage |
|-------|-----------|------------|-----------------------|
| 0     | 1,104     | 83.32      | 83.32                 |
| 1     | 187       | 14.11      | 97.43                 |
| 2     | 28        | 2.11       | 99.55                 |
| 3+    | 6         | 0.45       | 100.00                |
| Total | 1,325     | 100.00     |                       |



# Summary statistics

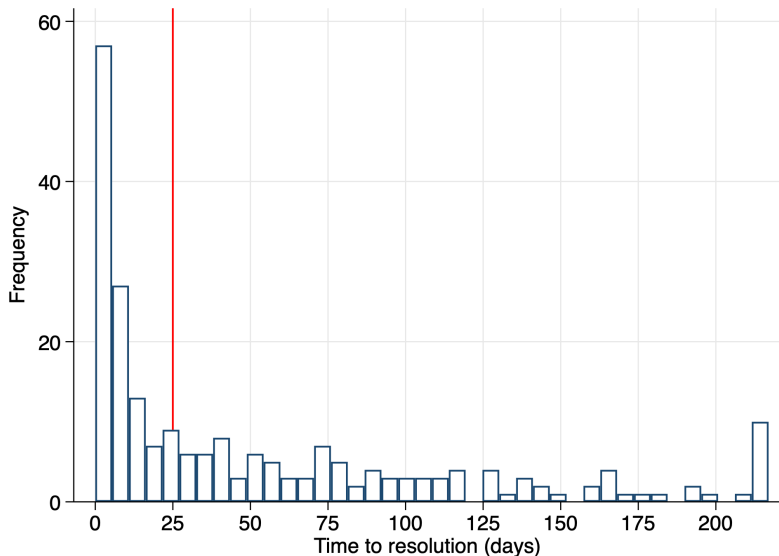


## Summary statistics

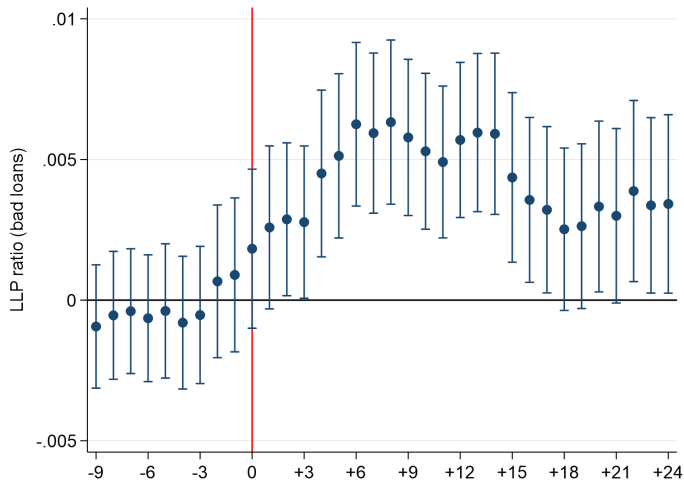




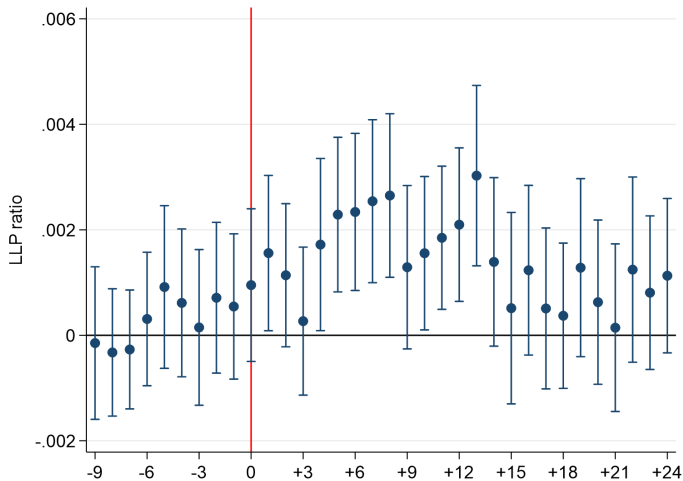
# Summary statistics



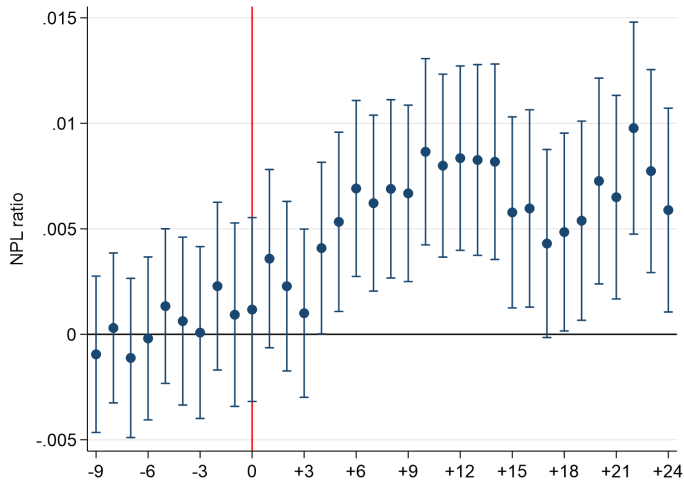
# The effect on banks' balance sheet: Dynamic



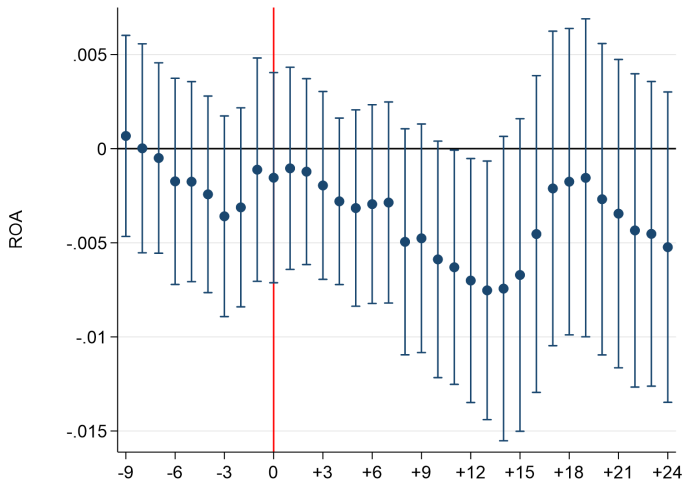
# The effect on banks' balance sheet: Dynamic



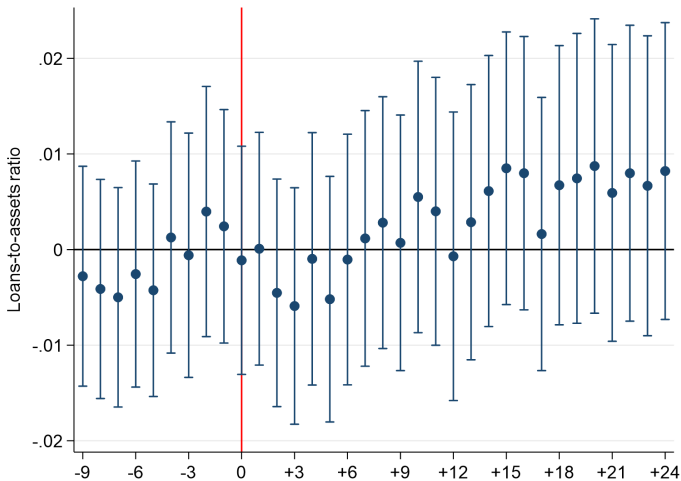
# The effect on banks' balance sheet: Dynamic



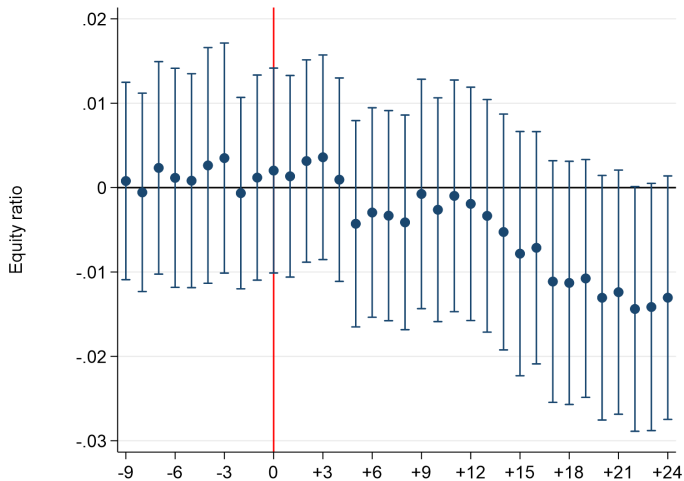
# The effect on banks' balance sheet: Dynamic



# The effect on banks' balance sheet: Dynamic



# The effect on banks' balance sheet: Dynamic



## The effect on banks' balance sheet: PSM

- To create a matched sample, we follow the standard approach in the literature: for a bank  $b$  inspected at period  $p$ , we compute the propensity score by running a logit model of the following form:

$$\log(y_{b,p}) = \alpha_0 + \delta \mathbf{X}_{b,p} + \epsilon_{b,p} \quad (6)$$

- We then match (with replacement) an inspected bank with a non-inspected bank based on one-to-one nearest neighbor matching within a 0.25 standard deviations caliper of the estimated propensity score
- Based on the matched sample, we then re-estimate the regressions from Equation (1)





## The effect on banks' balance sheet: PSM

|                    | (1)                   | (2)                 | (3)                      | (4)                | (5)                 | (6)                |
|--------------------|-----------------------|---------------------|--------------------------|--------------------|---------------------|--------------------|
|                    | NPL/TA                | LLP/TA              | LLP <sub>risky</sub> /TA | Capital/TA         | ROA                 | Loans/TA           |
| Post SupTech       | 0.0102***<br>(0.0031) | 0.0039*<br>(0.0024) | 0.0069**<br>(0.0028)     | 0.0013<br>(0.0081) | -0.0071<br>(0.0045) | 0.0003<br>(0.0090) |
| Observations       | 26,280                | 26,037              | 26,037                   | 26,037             | 14,279              | 26,037             |
| Adjusted R-squared | 0.6393                | 0.3481              | 0.6050                   | 0.8657             | 0.4547              | 0.8852             |
| Controls           | Yes                   | Yes                 | Yes                      | Yes                | Yes                 | Yes                |
| Bank FE            | Yes                   | Yes                 | Yes                      | Yes                | Yes                 | Yes                |
| Time FE            | Yes                   | Yes                 | Yes                      | Yes                | Yes                 | Yes                |



## The effect on banks' balance sheet: Falsification

- Although the staggered nature of SupTech events makes it unlikely that our results are driven by other events, we run falsification tests to ensure that our results are not driven by other, coinciding events
- Specifically, we assign a random date in the pre-enforcement period to the bank's supervisory intervention, and then estimate the effect of these placebo interventions on banks' balance sheet



## The effect on banks' balance sheet: Falsification

|                    | (1)                | (2)                | (3)                      | (4)                 | (5)                 | (6)                |
|--------------------|--------------------|--------------------|--------------------------|---------------------|---------------------|--------------------|
|                    | NPL/TA             | LLP/TA             | LLP <sub>risky</sub> /TA | Capital/TA          | ROA                 | Loans/TA           |
| Post SupTech       | 0.0024<br>(0.0020) | 0.0002<br>(0.0006) | 0.0002<br>(0.0014)       | -0.0093<br>(0.0086) | -0.0020<br>(0.0038) | 0.0095<br>(0.0083) |
| Observations       | 92,462             | 91,634             | 91,634                   | 91,634              | 51,508              | 91,634             |
| Adjusted R-squared | 0.6834             | 0.5747             | 0.6379                   | 0.8689              | 0.5919              | 0.8913             |
| Controls           | Yes                | Yes                | Yes                      | Yes                 | Yes                 | Yes                |
| Bank FE            | Yes                | Yes                | Yes                      | Yes                 | Yes                 | Yes                |
| Time FE            | Yes                | Yes                | Yes                      | Yes                 | Yes                 | Yes                |



## The effect on banks' balance sheet: Stacked

- Recently, researchers have raised concerns about the use of standard two-way fixed effects estimators for difference-in-differences estimates with variation in treatment timing (e.g., [Baker et al., 2022](#)).
- To alleviate this concern, we provide an alternative estimation method, a stacked difference-in-differences model, that addresses this concern (see [Deshpande and Li, 2019](#); [Joaquim et al., 2019](#)):

$$y_{b,p,t} = \beta Treated_{b,p} + \gamma^{post} (Treated_{b,p} \times Post_{p,t}) + \alpha_{b,p} + \alpha_{p,t} + \epsilon_{b,p,t} \quad (7)$$



## The effect on banks' balance sheet: Stacked

|                    | (1)                   | (2)                   | (3)                      | (4)                | (5)                 | (6)                 |
|--------------------|-----------------------|-----------------------|--------------------------|--------------------|---------------------|---------------------|
|                    | NPL/TA                | LLP/TA                | LLP <sub>risky</sub> /TA | Capital/TA         | ROA                 | Loans/TA            |
| Treated × Post     | 0.0077***<br>(0.0022) | 0.0014***<br>(0.0005) | 0.0043***<br>(0.0015)    | 0.0036<br>(0.0045) | -0.0007<br>(0.0015) | -0.0015<br>(0.0050) |
| Observations       | 382,337               | 378,465               | 378,465                  | 378,465            | 204,891             | 378,465             |
| Adjusted R-squared | 0.8373                | 0.6414                | 0.8392                   | 0.9499             | 0.6852              | 0.9563              |
| Controls           | Yes                   | Yes                   | Yes                      | Yes                | Yes                 | Yes                 |
| Bank × Cohort FE   | Yes                   | Yes                   | Yes                      | Yes                | Yes                 | Yes                 |
| Time × Cohort FE   | Yes                   | Yes                   | Yes                      | Yes                | Yes                 | Yes                 |



## Channel: The length of SupTech events

|                               | (1)                   | (2)                   | (3)                      |
|-------------------------------|-----------------------|-----------------------|--------------------------|
|                               | NPL/TA                | LLP/TA                | LLP <sub>risky</sub> /TA |
| Post SupTech <sub>short</sub> | 0.0064**<br>(0.0026)  | 0.0018***<br>(0.0007) | 0.0047***<br>(0.0017)    |
| Post SupTech <sub>long</sub>  | 0.0072***<br>(0.0026) | 0.0015***<br>(0.0007) | 0.0047<br>(0.0037)       |
| Observations                  | 100,194               | 99,257                | 99,257                   |
| Adjusted R-squared            | 0.6751                | 0.5398                | 0.6326                   |
| Controls                      | Yes                   | Yes                   | Yes                      |
| Bank FE                       | Yes                   | Yes                   | Yes                      |
| Time FE                       | Yes                   | Yes                   | Yes                      |



# The effect of SupTech events on banks' lending behavior

|                | (1)                | (2)                | (3)                | (4)                  |
|----------------|--------------------|--------------------|--------------------|----------------------|
|                | ln(Loan rate)      | ln(Loan rate)      | ln(Loan rate)      | ln(Loan rate)        |
| Post SupTech   | 0.2774<br>(0.3771) | 0.2390<br>(0.2917) | 0.1765<br>(0.3254) | 0.3541**<br>(0.1560) |
| Observations   | 14,870,060         | 12,452,655         | 6,219,594          | 6,100,998            |
| R-squared      | 0.5313             | 0.5455             | 0.6281             | 0.8369               |
| Controls       | No                 | Yes                | Yes                | Yes                  |
| Bank FE        | Yes                | Yes                | Yes                | No                   |
| Firm FE        | Yes                | Yes                | No                 | No                   |
| Time FE        | Yes                | Yes                | No                 | No                   |
| Firm × Time FE | No                 | No                 | Yes                | Yes                  |
| Bank × Firm FE | No                 | No                 | No                 | Yes                  |



# The effect of SupTech events on banks' lending behavior

|                             | (1)                   | (2)                   | (3)                  | (4)                  |
|-----------------------------|-----------------------|-----------------------|----------------------|----------------------|
|                             | ln(Loan rate)         | ln(Loan rate)         | ln(Loan rate)        | ln(Loan rate)        |
| Panel A:                    |                       |                       |                      |                      |
| Post supervision × Arrears  | 0.5166**<br>(0.265)   | 0.8615***<br>(0.3209) | 0.7554**<br>(0.3470) | 0.3485**<br>(0.1672) |
| R-squared                   | 0.5378                | 0.6176                | 0.6561               | 0.8364               |
| Panel B:                    |                       |                       |                      |                      |
| Post supervision × Subprime | 0.4391***<br>(0.1375) | 0.8934***<br>(0.3363) | 0.7249*<br>(0.3703)  | 0.4013**<br>(0.1830) |
| R-squared                   | 0.5380                | 0.6177                | 0.6560               | 0.8362               |
| Observations                | 10,219,038            | 5,196,395             | 5,189,108            | 5,069,598            |
| Controls                    | Yes                   | Yes                   | Yes                  | Yes                  |
| Bank FE                     | Yes                   | Yes                   | No                   | No                   |
| Firm FE                     | Yes                   | No                    | No                   | No                   |
| Time FE                     | Yes                   | No                    | No                   | No                   |
| Bank × Time FE              | No                    | No                    | Yes                  | No                   |
| Firm × Time FE              | No                    | Yes                   | Yes                  | Yes                  |
| Bank × Firm FE              | No                    | No                    | No                   | Yes                  |





## The effect of SupTech events on banks' lending behavior

|                | (1)                   | (2)                   | (3)                | (4)                |
|----------------|-----------------------|-----------------------|--------------------|--------------------|
|                | ln(Maturity)          | ln(Maturity)          | ln(Maturity)       | ln(Maturity)       |
| Post SupTech   | 0.1921***<br>(0.0422) | 0.1644***<br>(0.0460) | 0.1007<br>(0.0665) | 0.0354<br>(0.0255) |
| Observations   | 14,870,060            | 12,452,655            | 6,219,594          | 6,100,998          |
| R-squared      | 0.5218                | 0.5318                | 0.6226             | 0.8550             |
| Controls       | No                    | Yes                   | Yes                | Yes                |
| Bank FE        | Yes                   | Yes                   | Yes                | No                 |
| Firm FE        | Yes                   | Yes                   | No                 | No                 |
| Time FE        | Yes                   | Yes                   | No                 | No                 |
| Firm × Time FE | No                    | No                    | Yes                | Yes                |
| Bank × Firm FE | No                    | No                    | No                 | Yes                |



# The effect of SupTech events on banks' lending behavior

|                         | (1)                   | (2)                    | (3)                    | (4)                    |
|-------------------------|-----------------------|------------------------|------------------------|------------------------|
|                         | ln(Maturity)          | ln(Maturity)           | ln(Maturity)           | ln(Maturity)           |
| Panel A:                |                       |                        |                        |                        |
| Post SupTech × Arrears  | -0.2872**<br>(0.1097) | -0.2475***<br>(0.0636) | -0.2928***<br>(0.0675) | -0.1506***<br>(0.0469) |
| R-squared               | 0.5386                | 0.6256                 | 0.6386                 | 0.8251                 |
| Panel B:                |                       |                        |                        |                        |
| Post SupTech × Subprime | -0.2778*<br>(0.1680)  | -0.2996***<br>(0.0984) | -0.3117***<br>(0.1004) | -0.1810**<br>(0.0731)  |
| R-squared               | 0.5382                | 0.6235                 | 0.6364                 | 0.8552                 |
| Observations            | 12,452,655            | 6,219,594              | 6,211,012              | 6,100,998              |
| Controls                | Yes                   | Yes                    | Yes                    | Yes                    |
| Bank FE                 | Yes                   | Yes                    | No                     | No                     |
| Firm FE                 | Yes                   | No                     | No                     | No                     |
| Time FE                 | Yes                   | No                     | No                     | No                     |
| Bank × Time FE          | No                    | No                     | Yes                    | No                     |
| Firm × Time FE          | No                    | Yes                    | Yes                    | Yes                    |
| Bank × Firm FE          | No                    | No                     | No                     | Yes                    |



## The effect of SupTech events on banks' lending behavior

|                | (1)                | (2)                 | (3)                 | (4)                 |
|----------------|--------------------|---------------------|---------------------|---------------------|
|                | Pr(Collateral)     | Pr(Collateral)      | Pr(Collateral)      | Pr(Collateral)      |
| Post SupTech   | 0.0073<br>(0.0477) | -0.0088<br>(0.0538) | -0.0222<br>(0.0422) | -0.0108<br>(0.0329) |
| Observations   | 14,870,060         | 12,452,655          | 6,219,594           | 6,100,998           |
| R-squared      | 0.4738             | 0.4928              | 0.6035              | 0.8220              |
| Controls       | No                 | Yes                 | Yes                 | Yes                 |
| Bank FE        | Yes                | Yes                 | Yes                 | No                  |
| Firm FE        | Yes                | Yes                 | No                  | No                  |
| Time FE        | Yes                | Yes                 | No                  | No                  |
| Firm × Time FE | No                 | No                  | Yes                 | Yes                 |
| Bank × Firm FE | No                 | No                  | No                  | Yes                 |



# The effect of SupTech events on banks' lending behavior

|                         | (1)                 | (2)                 | (3)                 | (4)                   |
|-------------------------|---------------------|---------------------|---------------------|-----------------------|
|                         | Pr(Collateral)      | Pr(Collateral)      | Pr(Collateral)      | Pr(Collateral)        |
| Panel A:                |                     |                     |                     |                       |
| Post SupTech × Arrears  | -0.0365<br>(0.0417) | -0.0214<br>(0.0231) | -0.0013<br>(0.0186) | -0.0441*<br>(0.0238)  |
| R-squared               | 0.4952              | 0.6049              | 0.6928              | 0.8223                |
| Post SupTech × Subprime | -0.0736<br>(0.0594) | -0.0470<br>(0.0295) | -0.0149<br>(0.0217) | -0.1011**<br>(0.0462) |
| R-squared               | 0.4929              | 0.6035              | 0.6917              | 0.8221                |
| Observations            | 10,219,038          | 5,196,395           | 5,189,108           | 5,069,598             |
| Controls                | Yes                 | Yes                 | Yes                 | Yes                   |
| Bank FE                 | Yes                 | Yes                 | No                  | No                    |
| Firm FE                 | Yes                 | No                  | No                  | No                    |
| Time FE                 | Yes                 | No                  | No                  | No                    |
| Bank × Time FE          | No                  | No                  | Yes                 | No                    |
| Firm × Time FE          | No                  | Yes                 | Yes                 | Yes                   |
| Bank × Firm FE          | No                  | No                  | No                  | Yes                   |



# The effect of SupTech events on banks' lending behavior

|                | (1)                   | (2)                   | (3)                   | (4)                  |
|----------------|-----------------------|-----------------------|-----------------------|----------------------|
|                | Rating deviation      | Rating deviation      | Rating deviation      | Rating deviation     |
| Post SupTech   | -0.02618<br>(0.02835) | -0.02051<br>(0.03102) | -0.03432<br>(0.05257) | 0.01538<br>(0.03192) |
| Observations   | 14,871,421            | 12,453,694            | 6,220,155             | 6,101,470            |
| R-squared      | 0.0812                | 0.0877                | 0.1417                | 0.6109               |
| Controls       | No                    | Yes                   | Yes                   | Yes                  |
| Bank FE        | Yes                   | Yes                   | Yes                   | No                   |
| Firm FE        | Yes                   | Yes                   | No                    | No                   |
| Time FE        | Yes                   | Yes                   | No                    | No                   |
| Firm × Time FE | No                    | No                    | Yes                   | Yes                  |
| Bank × Firm FE | No                    | No                    | No                    | Yes                  |

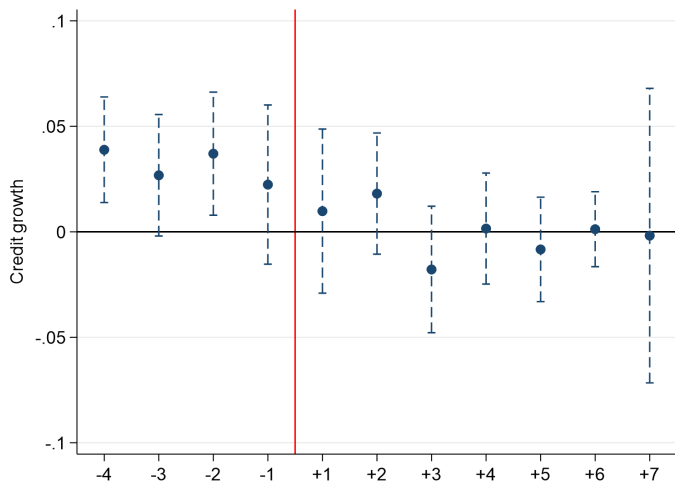


# The effect of SupTech events on banks' lending behavior

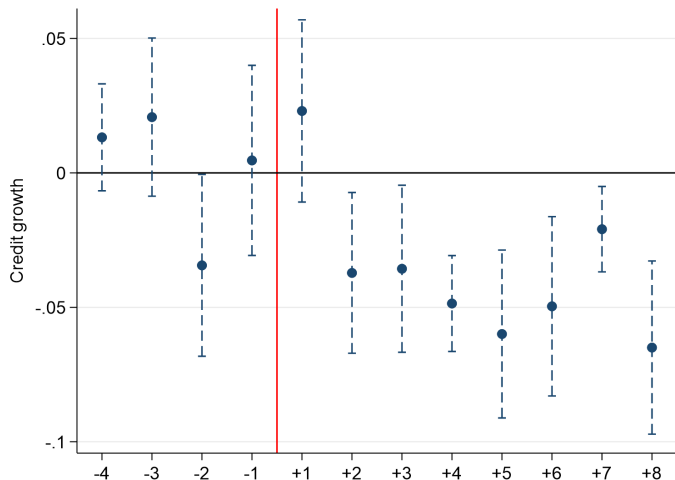
|                         | (1)<br>Rating deviation | (2)<br>Rating deviation | (3)<br>Rating deviation | (4)<br>Rating deviation |
|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| Panel A:                |                         |                         |                         |                         |
| Post SupTech × Arrears  | -0.1307**<br>(0.0574)   | -0.3567***<br>(0.1096)  | -0.3492***<br>(0.1122)  | -0.2470***<br>(0.0709)  |
| R-squared               | 0.1048                  | 0.1935                  | 0.2321                  | 0.6194                  |
| Panel B:                |                         |                         |                         |                         |
| Post SupTech × Subprime | -0.0841<br>(0.1379)     | -0.1585<br>(0.1172)     | -0.1504<br>(0.1188)     | -0.0659<br>(0.1045)     |
| R-squared               | 0.1741                  | 0.5609                  | 0.5914                  | 0.7771                  |
| Observations            | 12,453,694              | 6,220,155               | 6,211,525               | 6,101,470               |
| Controls                | Yes                     | Yes                     | Yes                     | Yes                     |
| Bank FE                 | Yes                     | Yes                     | No                      | No                      |
| Firm FE                 | Yes                     | No                      | No                      | No                      |
| Time FE                 | Yes                     | No                      | No                      | No                      |
| Bank × Time FE          | No                      | No                      | Yes                     | No                      |
| Firm × Time FE          | No                      | Yes                     | Yes                     | Yes                     |
| Bank × Firm FE          | No                      | No                      | No                      | Yes                     |



# The effect of SupTech events on banks' lending behavior: Dynamic

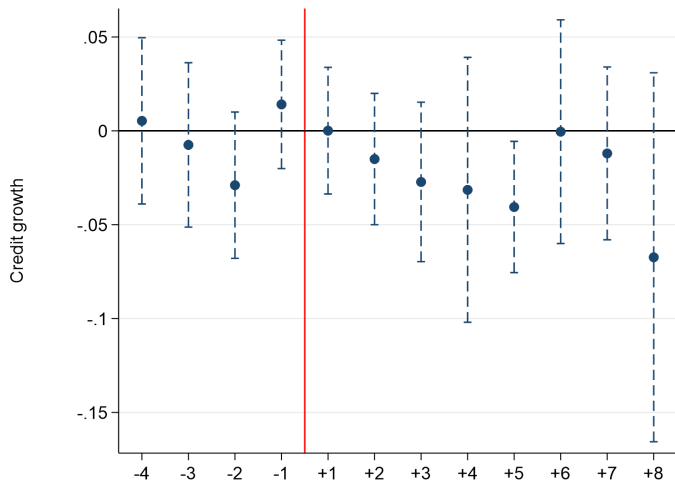


# The effect of SupTech events on banks' lending behavior: Dynamic





# The effect of SupTech events on banks' lending behavior: Dynamic



# The effect of SupTech events on banks' lending behavior: Falsification

|                | (1)                 | (2)                | (3)                 | (4)                |
|----------------|---------------------|--------------------|---------------------|--------------------|
|                | Credit growth       | Credit growth      | Credit growth       | Credit growth      |
| Post SupTech   | -0.0159<br>(0.0249) | 0.0081<br>(0.0072) | -0.0017<br>(0.0050) | 0.0057<br>(0.0044) |
| Observations   | 10,478,565          | 10,466,282         | 5,371,450           | 5,243,909          |
| R-squared      | 0.0059              | 0.0755             | 0.4418              | 0.5108             |
| Controls       | No                  | Yes                | Yes                 | Yes                |
| Bank FE        | Yes                 | Yes                | Yes                 | No                 |
| Firm FE        | Yes                 | Yes                | No                  | No                 |
| Time FE        | Yes                 | Yes                | No                  | No                 |
| Firm × Time FE | No                  | No                 | Yes                 | Yes                |
| Bank × Firm FE | No                  | No                 | No                  | Yes                |



# The effect of SupTech events on banks' lending behavior: Falsification

|                       | (1)                | (2)                 | (3)                 | (4)                 |
|-----------------------|--------------------|---------------------|---------------------|---------------------|
|                       | Credit growth      | Credit growth       | Credit growth       | Credit growth       |
| Panel A:              |                    |                     |                     |                     |
| Post SupTech×Arrears  | 0.0200<br>(0.0240) | -0.0207<br>(0.0081) | 0.0124<br>(0.0192)  | -0.0313<br>(0.0199) |
| R-squared             | 0.0756             | 0.4441              | 0.5120              | 0.4589              |
| Panel B:              |                    |                     |                     |                     |
| Post SupTech×Subprime | 0.0118<br>(0.0295) | -0.0121<br>(0.0187) | -0.0103<br>(0.0137) | -0.0209<br>(0.0156) |
| R-squared             | 0.0799             | 0.4410              | 0.5092              | 0.4560              |
| Observations          | 10,219,038         | 5,196,395           | 5,069,598           | 5,189,108           |
| Controls              | Yes                | Yes                 | Yes                 | Yes                 |
| Bank FE               | Yes                | Yes                 | No                  | No                  |
| Firm FE               | Yes                | No                  | No                  | No                  |
| Time FE               | Yes                | No                  | No                  | No                  |
| Bank × Time FE        | No                 | No                  | No                  | Yes                 |
| Firm × Time FE        | No                 | Yes                 | Yes                 | Yes                 |
| Bank × Firm FE        | No                 | No                  | Yes                 | No                  |

