Report on Banks

December 2021

BANCO CENTRAL
DE LA REPÚBLICA ARGENTINA

Table of Contents

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Published on February 23, 2022.
The data reported are provisional and subject to changes. Information corresponds to end-of-month data.

Data of charts and Latest Regulations of this issue. Statistics Annexes for the financial system and the ensemble of financial institutions. Glossary of abbreviations and acronyms.

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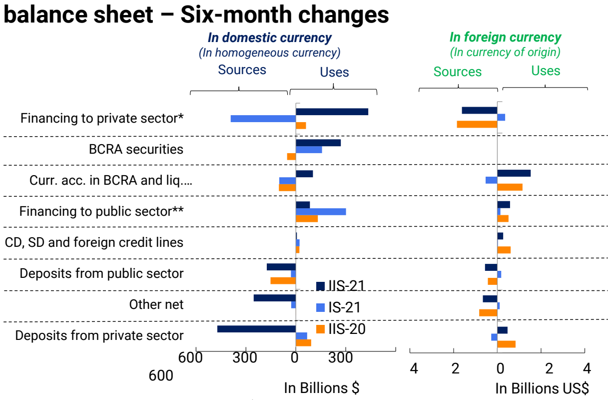
Executive Summary

- During the second half of 2021, loans in pesos to the private sector and deposits arranged by this sector posted a remarkable performance. In this context, the financial system kept high levels of solvency and liquidity. Likewise, retail electronic means of payment continued to grow steadily in 2021, and their share went up significantly in terms of transactions of the economy.
- In December, lending in pesos to the private sector increased 1.2% in real terms (+5% in nominal terms), thus recording five consecutive months of positive changes in real terms. Given the recovery observed in recent months, the total stock of loans to the private sector stood, in late 2021, at a level similar to the level recorded one year ago (-0.6% year-on-year (y.o.y.) in real terms or +49.9% y.o.y. in nominal terms). Among the measures implemented by the BCRA to encourage loans to the private sector, the "Credit Line for Productive Investment of micro, small and medium-sized enterprises (MSMEs)" stands out, with $1.6 trillion already disbursed until late January 2022 to over 215,500 companies.
- Private sector deposits in domestic currency went up 3.3% in real terms in December (+7.2% in nominal terms). Within a context characterized by seasonal factors, sight accounts increased 6.8% (+10.9% in nominal terms), while time deposits contracted 0.5% in real terms (+3.3% in nominal terms). In a year-on-year comparison, the stock of private sector deposits in pesos grew 5% in real terms (+58.3% in nominal terms), with rises in both sight accounts and time deposits.
- The non-performing ratio of loans to the private sector for the aggregate financial system shrank 0.2 percentage points (p.p.) against November, down to 4.3% by the end of the year. The drop included both loans to households and to companies. Consequently, the non-performing ratio of the financial system is standing below the levels observed before the onset of the COVID-19 pandemic: 6.1% on average in the first two months of 2020 and 4.5% on average in 2019. The sector's provisioning accounted for 4.9% of the total stock of loans to the private sector and for 114.1% of the non-performing stock of loans by the end of the year.
- In 2021, the concentration of the total portfolio of loans to the private sector was limited and followed a decreasing trend in terms of the relative share of the main debtors. In particular, the 100 and 50 main private sector debtors accounted for 13.6% and 10.5% of the total stock of loans in the aggregate financial system as of December 2021, standing among the lowest levels of the last 16 years.
- The liquidity ratios of the aggregate financial system closed the year at high levels against the levels of the last 10 years. The stock of liquid assets in a broad sense totaled 68.7% of total deposits in December, up 0.2 p.p. and 3.7 p.p. against November 2021 and December 2020, respectively.
- Over the month, the Regulatory Capital (RC) in terms of risk-weighted assets (RWAs) stood at 25.7% for the ensemble of institutions (posting no changes against November and +1.6 p.p. y.o.y.), while the capital surplus position (RC minus the regulatory requirement) accounted for 218.4% of the minimum requirement over the period (+2.1 p.p. over the month and +26.1 p.p. y.o.y.). The leverage ratio —defined according to the Basel Committee's guidelines— reached 12.7% in December for the aggregate financial system, exceeding the regulatory minimum value of 3%.
- In 2021, the ensemble of financial institutions accrued a total comprehensive income in homogeneous currency equivalent to 1.1% of assets (ROA) and to 7.3% of equity (ROE). These levels stood below the levels observed in 2020.
- Regarding the 3.0 Transfer initiative, and as from the full commencement of the interoperability of transactions initiated with QR code (late November 2021), payments by transfer gained a remarkable momentum. From December 2021 to early February 2022, 3.1 million transactions were made for an aggregate amount of $5.3 billion. In terms of daily transactions, it is especially remarkable that, in early February, the average of payments by transfer reached $102 million, more than doubling the value recorded in early December 2021 in nominal terms.

I. Financial Intermediation Activity

In the last month of 2021, financial intermediation in domestic currency with the private sector continued to be on the rise. In particular, taking into account the differences in the balance sheet of the aggregate financial system for the items in domestic currency [1] —expressed in homogeneous currency— the increase in the private and public sectors' stock of deposits stood out. In turn, there was a monthly increase of broad liquidity and of financing to both the private and the public sectors. In relation with items in foreign currency [2] —expressed in currency of origin—, there was an increase in deposits over the month, added to a decrease in the stock of lending to the private sector, which was offset by a rise in liquidity.

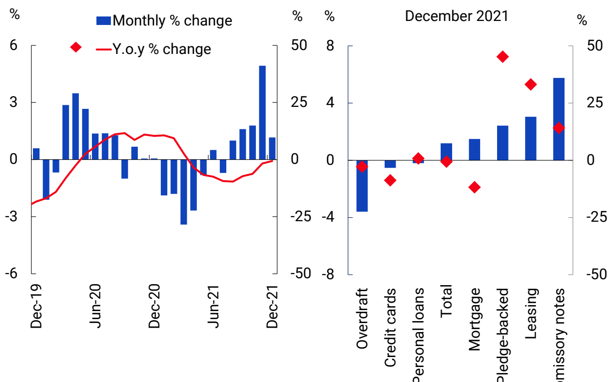
Chart 1 | Main components of the financial system's balance sheet – Six-month changes



*Loan principal is considered (capital adjustments and accrued interest are excluded).**Admissible assets for the calculation of minimum cash integration are considered. Source: BCRA

Taking into account the differences in the aggregate balance sheet stated for December, the performance of lending in pesos to the private sector and of deposits arranged by households and companies has been remarkable during the second half of 2021. Over this period, unlike what happened in the previous two six-month periods, these concepts accounted for the most important changes in real terms between the aggregate assets and liabilities of the sector (see Chart 1).

Chart 2 | Stock of loans to the private sector in pesos
In real terms* - Financial System

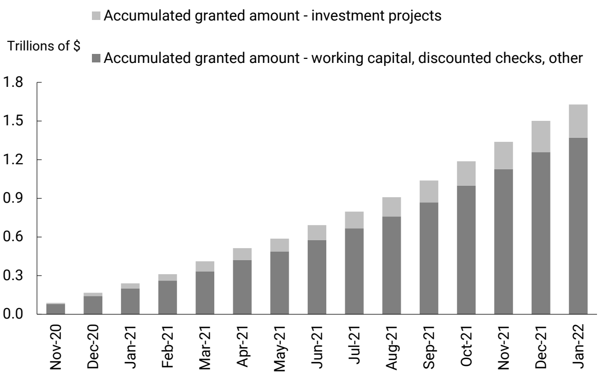


*Not seasonally adjusted. Total includes adjustments of principal and interest accrued. Source BCRA.

Regarding the monthly performance, the stock of loans in domestic currency to the private sector went up 1.2% in real terms in December (+5% in nominal terms) (see Chart 2), [3] showing some heterogeneity across credit lines and across groups of financial institutions. Thus, the stock of loans in pesos to the private sector measured in real terms went up for the fifth consecutive month, accumulating a 28.1% expansion in real terms and annualized (a.) between end of July and end of December and posting the best relative performance of the last four years. Given the recovery observed in recent months, as of December, the stock of lending in pesos to the private sector, measured in homogenous currency, stood at a level similar to that recorded one year ago (-0.6% in real terms or +49.9% in nominal terms).

1 Differences of the balance sheet stock expressed in homogeneous currency. Information taken from the Monthly Accounting Reporting System (December 2021, latest information available at the time of publication of this Report).
2 Expressed in currency of origin.
3 Including capital adjustments and accrued interest.

Chart 3 | Credit Line for Productive Investment (LFIP) of MSMEs



Note: Data up to end of each month. Data subject to correction. Source: BCRA

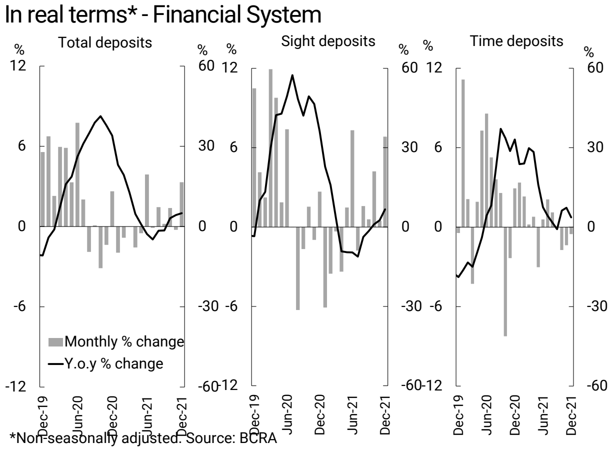
In the context of measures adopted by the BCRA to encourage credit to the private sector throughout 2021, the "Credit Line for Productive Investment of MSMEs"[4] (LFIP) has been especially remarkable. Total disbursements for loans arranged via this Credit Line reached an amount equivalent to $1.6 trillion from its launch (in mid-October 2020) to early 2022 (see Chart 3), benefiting over 215,500 companies. Nearly 16% of the total amount disbursed was meant for investment projects.

In addition, under the credit line at subsidized interest rates for companies registered with the "Emergency Assistance Program for Work and Production" (ATP),[5] around $14.3 billion were disbursed in over 20,900 loans by late January 2022.

In turn, regarding the credit lines under favorable conditions and intended for workers developing their activities under the Simplified Tax Regime and for self-employed workers, via the "2021 Zero Interest Rate Credit Line", around 333,900 loans were granted for over $38.9 billion until January 2022.[6] Thus, together with the "2020 Zero Interest Rate Credit Line", over $104.5 billion have been disbursed so far.

The stock of loans in foreign currency to the private sector went down 2.1% in December —in currency of origin—, mainly due to the performance of domestic private financial institutions. Thus, the total stock of loans (in domestic and foreign currency) to the private sector increased 0.7% in real terms against November (4.5% in nominal terms), accumulating a year-on-year drop of 5.5% in real terms.

Chart 4 | Stock of private sector deposits in pesos
In real terms* - Financial System



*Non seasonally adjusted. Source: BCRA

In terms of the ensemble of financial institutions' funding, the stock of private sector deposits in pesos went up 3.3% in real terms between ends of month (+7.2% in nominal terms) (see Chart 4), with rises across all groups of banks. In the context of the seasonal factors typical of all year ends, sight accounts grew 6.8% over

4 For further detail, see the Consolidated Text on "Credit Line for Productive Investment of MSMEs".
5 See Communication "A" 7082 and Communication "A" 7102.
6 See Communication "A" 7342.

the month (+10.9% in nominal terms), while time deposits contracted 0.5% in real terms (+3.3% in nominal terms).[7]

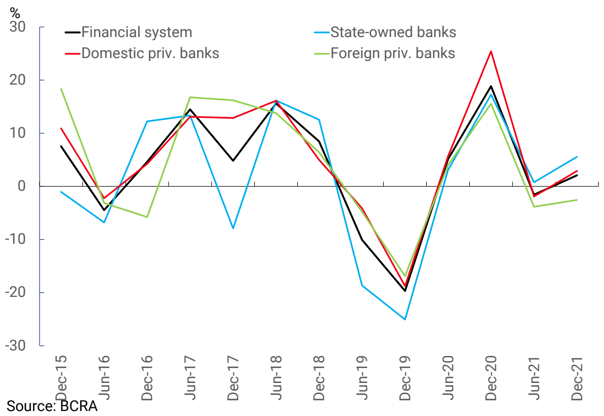
In part due to tax-related factors, the stock of private sector deposits in foreign currency grew 2.5% —in currency of origin— in December 2021, mainly due to the performance of sight accounts. In this context, total private sector deposits (including both domestic and foreign currency) rose 2.8% in real terms over the month (+6.8 in nominal terms).

In year-on-year terms, the private sector stock of deposits in domestic currency grew 5% in real terms (+58.3% in nominal terms). In turn, sight accounts rose 6.7% y.o.y. in real terms (+60.9% y.o.y. in nominal terms), while time deposits grew 3.7% y.o.y. in real terms (+56.4% y.o.y. in nominal terms). Public sector deposits in domestic currency accumulated a rise of 11.6% y.o.y. in real terms (+68.3% y.o.y. in nominal terms). Consequently, the total stock of both public and private sectors' deposits in pesos grew 6.5% in real terms in the last 12 months (+60.7% y.o.y. in nominal terms). Lastly, taking into consideration total deposits (all currencies and both sectors), the stock in real terms grew 1.7% y.o.y. in real terms (+53.3% y.o.y. in nominal terms).

II. Aggregate Balance Sheet Evolution and Composition

In December, total assets of the aggregate financial system went up 2.9% in real terms against November, with a widespread increase across the various groups of financial institutions. After the expansion recorded in 2020,[8] the sector's total assets grew more moderately in 2021 (2.1% in real terms, see Chart 5). The domestic financial institutions posted the highest relative growth throughout the year.

Chart 5 | Financial system's total assets
Year-on-year % change - In real terms

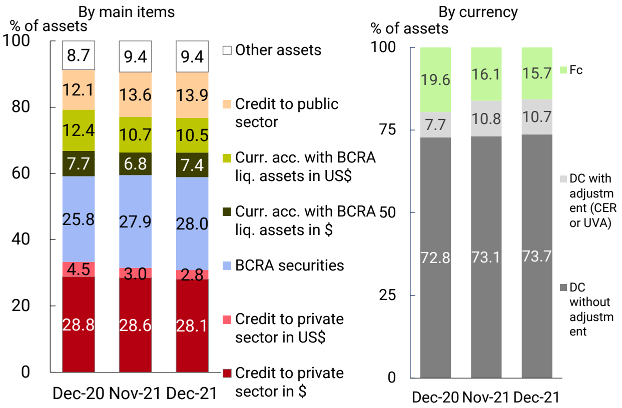


Source: BCRA

Regarding the components of the financial system's total assets, there was an increase in the share of the balance of current accounts held by the institutions with the BCRA in pesos and in the share of loans to the public sector (see Chart 6), while the relative weight of the remaining items contracted in December. Taking into consideration the assets by currency, there was a slight increase in the share of instruments arranged in pesos without CER adjustment and/or denominated in UVA.

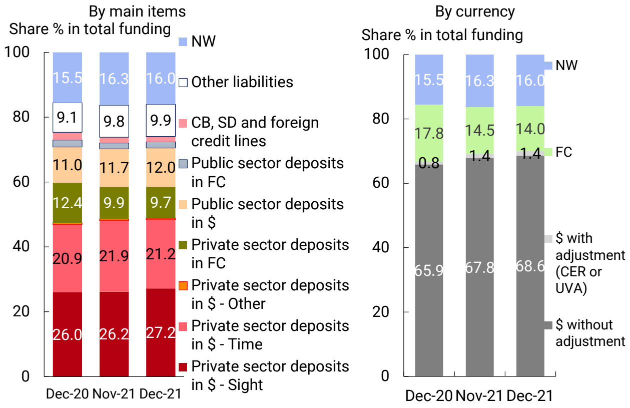
7 UVA time deposits increased 1.7% in real terms over the month (including the capital adjustment component), while traditional time deposits (without any adjustment component) contracted 0.2% in real terms. In turn, time investments went down 3.9% against November.
8 Between ends of year, in 2020, the financial system's total assets increased 18.9% in real terms, and this change is partly explained by the increase in loans in pesos and in the holdings of BCRA instruments (the latter within the context of monetary sterilization because of the issue made to put into practice the various extraordinary programs to provide financial support to the private sector).

Chart 6 | Composition of total assets
Financial System – Share %



FC. foreign currency. DC: domestic currency. Source: BCRA

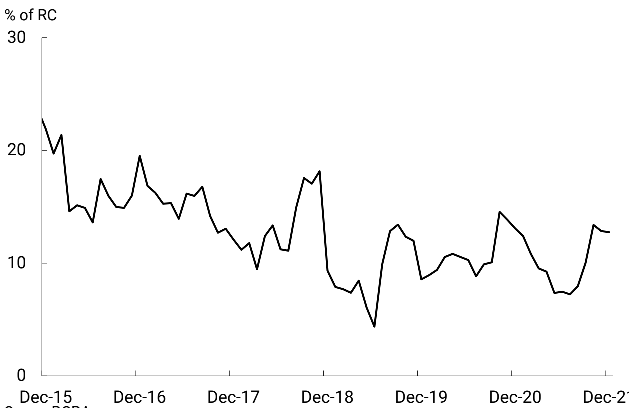
Chart 7 | Composition of the system's total funding
In % of total funding (liabilities + net worth)



FC: Foreign currency. Source: BCRA

In terms of the funding structure, the main events for the system as a whole were associated with the increase in the share of private sector sight accounts in pesos and the drop in the relative weight of time deposits in pesos of such sector (see Chart 7) over the month. Upon a breakdown by currency, there was an increase in the relative share of items in pesos without adjustment by CER and/or denominated in UVA.

Chart 8 | Foreign currency assets – Foreign currency liabilities + Foreign currency forward position — Financial System



Sorce: BCRA

The financial system closed 2021 with limited currency mismatches, within the framework of the macroprudential regulations in force. In December, the differential between assets and liabilities in foreign currency [9] of the ensemble of financial institutions stood at 12.7% of the regulatory capital (see Chart 8), slightly below the value recorded in November (-0.1 p.p.) and below the level recorded one year ago (-0.3 p.p. y.o.y.). Meanwhile, the positive differential between assets and liabilities with CER-adjusted capital and/or denominated in UVA totaled 66.7% of the regulatory capital by the end of 2021, up 1 p.p. against November and up 17 p.p. against the value of December 2020.

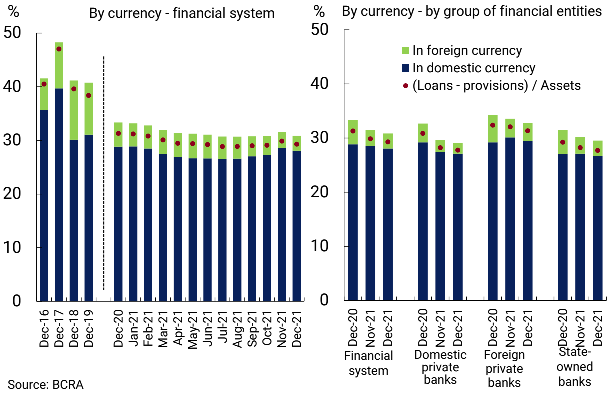
III. Portfolio Quality

The gross exposure of the financial system to the private sector (in both domestic and foreign currency) stood at 30.9% of total assets by the end of the year,[10] down 0.7 p.p. if compared to the

9 Including purchase and sale forward transactions in foreign currency, classified as off-balance
10 This ratio reached 29.3% if credit to the private sector is netted from the stock of accounting provisions.

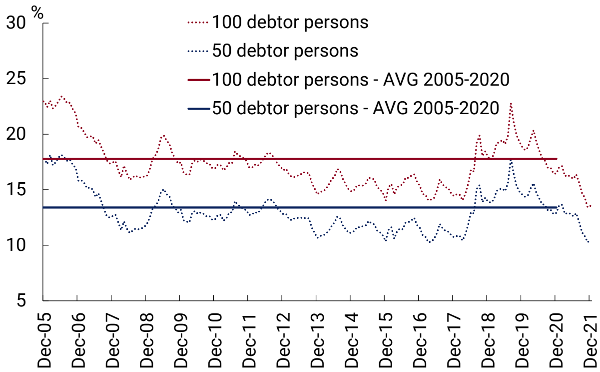
value recorded in November (-2.5 p.p. y.o.y.). The monthly decrease was widespread across the various groups of financial institutions, except for the Non-Banking Financial Institutions (EFNBs). When considering only lending in pesos, this ratio stood at 28.1%, down 0.5 p.p. against November (-0.8 p.p. y.o.y.) (see Chart 9). The share of lending to the private sector in foreign currency in total assets recorded a monthly drop of 0.2 p.p., down to 2.8% in the period (-1.7 p.p. y.o.y.).

Chart 9 | Stock of loans to the private sector / Assets



Source: BCRA

Chart 10 | Share of main debtors in the total stock of loans to the private sector

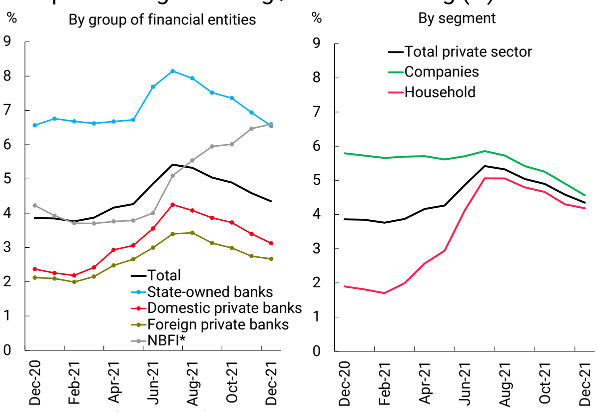


Source: BCRA

In December, the share of main debtors (both natural and legal persons) in the total portfolio of the financial system's loans to the private sector continued to be relatively low.[11] In particular, the 100 and 50 main debtors of the private sector[12] accounted for 13.6% and 10.5% of total loans of the aggregate financial system (see Chart 10), standing 2.9 p.p. and 2.4 p.p. below the figures of the same month of 2020, respectively. Thus, the current levels for these ratios are standing among the lowest of the last 16 years.

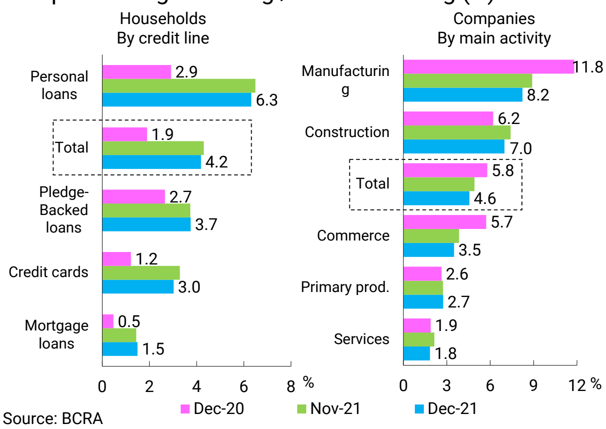
The non-performing ratio of loans to the private sector for the aggregate financial system shrank for the fifth consecutive month down to 4.3% by the end of the year, down 0.2 p.p. against the

Chart 11| Non-performing loans to the private sector
Non-performing financing / Total financing (%)



* NBFI: Non-Banking Financial Institutions. Source: BCRA

Chart 12| Non-performing loans to the private sector
Non-performing financing / Total financing (%)



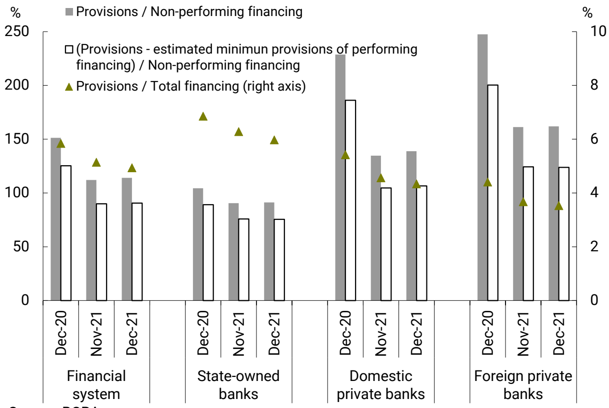
Source: BCRA

11 It is worth mentioning that macroprudential regulations establish some limits to Large Exposures to Credit Risk.
12 Considering the aggregate debt of the financial system; they are not necessarily the main debtors of each financial institution.

figure recorded in November (+0.5 p.p. y.o.y.),[13] and this performance was widespread across all banking financial institutions (see Chart 11). Thus, the system's non-performing ratio is standing below the levels observed before the onset of the COVID-19 pandemic: 6.1% on average in the first two months of 2020 and 4.5% on average in 2019. The evolution of the credit portfolio quality has occurred in the context of the targeted focus of the financial relief measures adopted, when applicable, during the pandemic.[14]

In December, the non-performing ratio of loans to households stood at 4.2% of the total stock of lending to this segment (see Chart 12), standing slightly below the level of November (+2.3 p.p. y.o.y.). The monthly performance was mainly driven by the drop in the delinquency rate of loans intended for consumption (credit cards and personal loans). In turn, the non-performing ratio of loans for companies stood at 4.6% over the period (see Chart 12), down 0.3 p.p. against the figure recorded in November (-1.2 p.p. y.o.y.). The credit portfolio quality of companies improved over the month in most economic sectors (except for the primary sector, which remained unchanged), and the performance of enterprises mainly involved in Industry and the Construction business was especially remarkable.

Chart 13 | Loans to the private sector and provisions
By group of institutions



Source: BCRA

By the end of 2021, total provisions of the aggregate financial system accounted for 4.9% of total loans to the private sector, down 0.2 p.p. and 0.9 p.p. against November 2021 and against December 2020, respectively (see Chart 13). Total provisions in terms of the non-performing portfolio stood at 114.1% over the month at systemic level (+2.0 p.p. on a monthly basis and -37.2 p.p. y.o.y.). In turn, the stock of regulatory provisions attributable to the non-performing portfolio (according to the criteria set by the rules on regulatory minimum provisions for loan loss exposure) accounted for 90.6% of such portfolio for the ensemble of financial institutions in December.

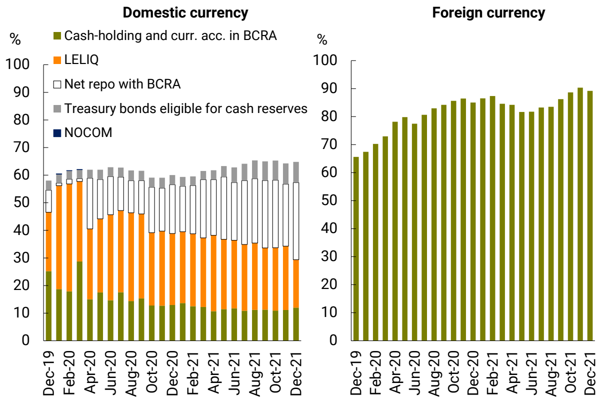
IV. Liquidity and Solvency

The financial system's liquidity and solvency ratios ended the year at high levels, from both a historical perspective and in an international comparison.

13 This monthly reduction was partly explained by the transfer of loans under Category 5 to bad loans in memorandum accounts.
14 See Communication "A" 6938, Communication "A" 7107, Communication "A" 7181, Communication "A" 7245 and Item 2.1.1. of the Consolidated Text on "Financial Services in the framework of the Health Emergency provided for by Executive Order No. 260/2020 CORONAVIRUS (COVID-19)".

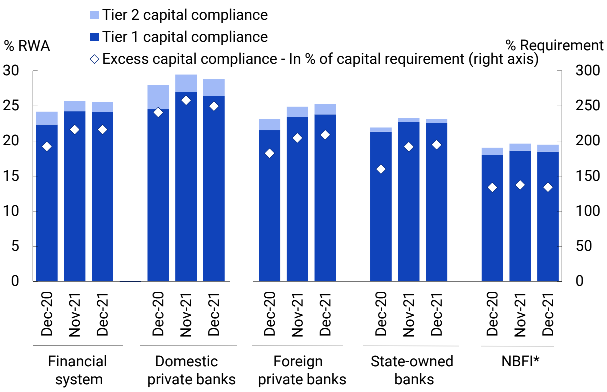
In December, the broad liquidity ratio[15] of the ensemble of financial institutions went up by 0.2 p.p. of deposits to 68.7% (+0.6 p.p. to 64.8% for the items in pesos and -1.1 p.p. to 89.2% for the segment in foreign currency, see Chart 14). Within liquid assets in pesos, there was an increase in the share of net repo transactions with the BCRA and of the balances of current accounts held by banks at this Institution; in turn, there was a decrease in the share of LELIQs. Throughout 2021, the broad liquidity ratio (in both domestic currency and foreign currency items) went up 3.7 p.p. at systemic level.

Chart 14 | Financial system liquidity
In % of deposits



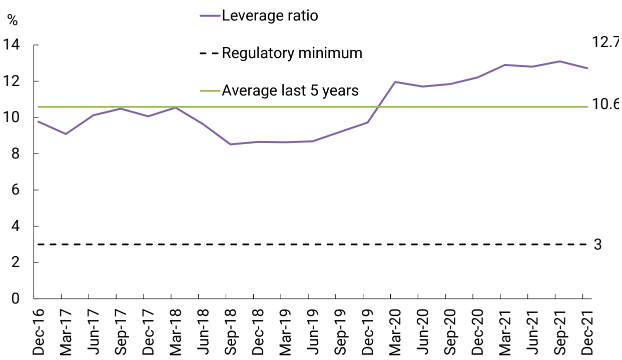
Source: BCRA

Chart 15 | Compliance with regulatory capital
By group of financial institutions



*NBFI: Non-Banking Financial Institutions. Source: BCRA

Chart 16 | Leverage Ratio (LR)



Source: BCRA

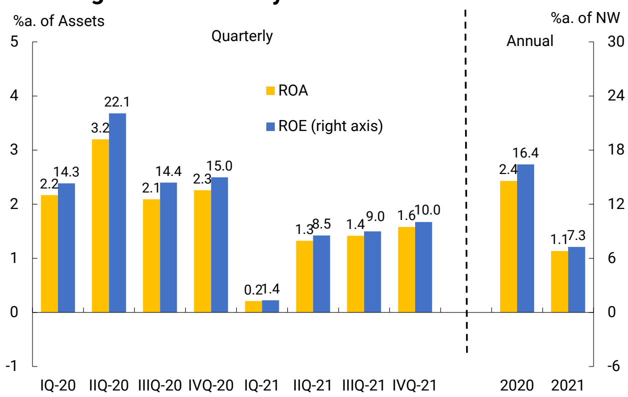
In December, as regards the aggregate financial system's solvency, the Regulatory Capital (RC) in terms of risk-weighted assets (RWAs) did not post significant changes and stood at around 25.7% (+1.6 p.p. y.o.y., see Chart 15). The capital surplus position (difference between RC and the regulatory minimum capital requirement) totaled 218.4% of the regulatory requirement for the ensemble of financial institutions over the month, up 2.1 p.p. against November (+26.1 p.p. y.o.y.).

Tier 1 Capital, with a greatest capacity to absorb potential losses, continued to account for over 94% of the financial system's total regulatory capital. The ratio between this capital component and the total exposure measure —leverage ratio according to the guidelines established by the Basel Committee— reached 12.7% in December for the ensemble of financial institutions (see Chart 16).[16] The level of this ratio did not show significant fluctuations throughout the year, sizably exceeding the regulatory minimum value of 3% and standing among the highest records since this regulatory requirement started to be effective at domestic level in 2018.

15 It considers liquid assets, assets admitted for compliance with minimum cash requirements, and BCRA instruments, in domestic currency and in foreign currency, in terms of the total stock of deposits.
16 For further detail on the methodology, see the Consolidated Text on "Leverage Ratio ".

An additional tool that may help assess the financial system's level of coverage in the face of the credit risk taken is the ratio between the regulatory capital surplus position and the loans to the private sector net of provisions. In December, this ratio stood at 31.7% at aggregate level, up 4 p.p. against the value recorded in late 2020 and quite above the average of the last 10 years (14.7%).

Chart17 | Financial system's total comprehensive income in homogeneous currency



Source: BCRA

As to the internally-generated funds of the sector, in the last quarter of 2021, the financial system recorded a slight increase in profitability ratios if compared to the third quarter, following an upward pattern along the year. The total comprehensive income in homogeneous currency accrued from October to December totaled 1.6%a. of assets (ROA) and 10%a. of equity (ROE), +0.2 p.p. and +1 p.p., respectively, against the third quarter of the year. However, in a year-on-year comparison, the profitability ratios corresponding to the fourth quarter of 2021 are lower than those recorded in the same period of 2020 (-0.7 p.p. in terms of ROA and -5 p.p. in terms of ROE).

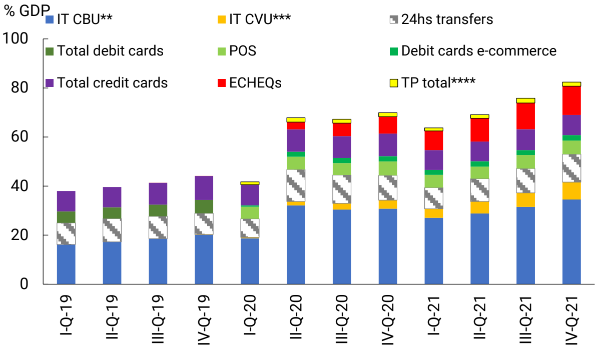
Consequently, throughout 2021, the financial system accrued a total comprehensive income in homogenous currency equivalent to 1.1% of assets (ROA) and to 7.3% of equity (ROE). These levels stood below the levels observed throughout 2020 (-1.3 p.p. and -9.2 p.p. in terms of assets and equity, respectively, see Chart 17). The main factors that impacted on a lower year-on-year profitability of the sector include an increase in the cost of funding with deposits, higher monetary losses (adjusted by inflation), the reduction of income from interest on loans and a lower income from securities (including those recorded in Other Comprehensive Income). In turn, this evolution was partly offset by higher income from premiums for repo transactions and a reduction of loan loss provisions, among other.

V. Payment System

Retail electronic means of payment continued growing steadily in 2021, in line with a higher demand from users in the pandemic context and boosted by the BCRA.

The adoption of new instruments and the continuous technological improvements in already existing mechanisms helped electronic payment transactions to gain share in the economy in recent years (see Chart 18). In particular, the combination of the main electronic means of payment in terms of domestic GDP experienced an 11.6 p.p. expansion in 2021, amounting to an increase of 37.6 p.p. if compared to the situation prevailing by late 2019. The main concepts behind the rise observed along the year include the clearing of electronic checks (ECHEQs), an instrument that grew 4.8 p.p. of GDP to 11.7% as of December 2021 (+11.7 p.p. against late 2019). To a lesser extent, the contribution made by instant transfers of funds was also remarkable over the year, either between CBU (Uniform Banking Code) accounts only (+3.7 p.p. of GDP to 34.5%) or in transactions involving accounts with Payment Service Providers (PSP; +3.6 p.p. of GDP, to 7.1%).

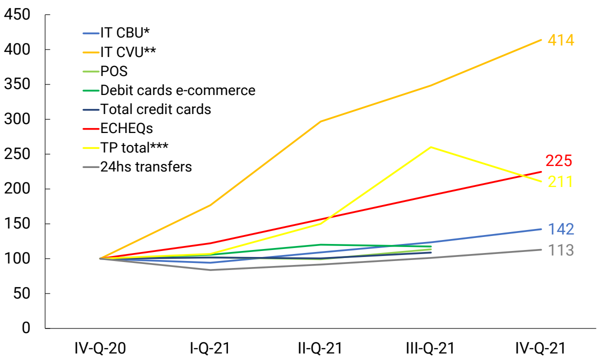
Chart 18 | Retail electronic means of payment
Amounts transacted in GDP %



*Three-month moving average annualized in terms of nominal GDP estimated for the same period, Not-seasonally adjusted. **IT between accounts open at financial entities (from and to a CBU) *** Transfers where accounts are opened at PSP (from and/or to CVU): CBU to CVU, CVU to CBU and CVU to CVU). **** TP = Transfers payments. Note: For credit cards operations with credit cards the last information available is Sep-21, value adjusted by monthly IPC in order to complete the year 2021. For debit card operations the last information available is Nov-21, value adjusted by Dec-21 IPC in order to complete the year 2021. Source: BCRA.

In terms of the number of transactions arranged, a similar evolution is observed regarding the expansion in the use of electronic means of payment in 2021 (see Chart 19). Upon a breakdown by type of instrument, instant transfers of funds involving PSPs and electronic checks clearing posted the highest momentum in 2021, growing 313% and 125%, respectively.

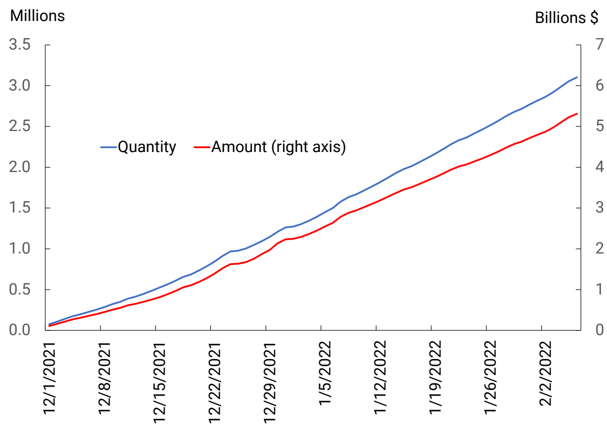
Chart 19 | Retail electronic means of payment
Number of transactions – Baseline Index



*IT = Instant transfers, between accounts open at financial entities (from and to a CBU) ** TI = Transfers where accounts are opened at PSP (from and/or to CVU: CBU a CVU, CVU a CBU y CVU a CVU). *** TP = transfers payment. Note 1: For credit cards operations with credit cards the last information available is Sep-21 and for debit card operations is Nov-21. Source: BCRA

Within the framework of the 3.0 Transfer initiative and as from the passing of the latest regulations by the BCRA to boost and implement the interoperability of transactions initiated with QR code,[17] payments by transfer have gained significant ground since November 2021 (when the scheme started to be applied in full) as evidenced by the number of transactions and the amounts arranged on a daily basis (see Chart 20). Specifically, the number of transactions accumulated from November 29, 2021 to February 6, 2022 amounted to 3.1 million, equivalent to $5.31 billion (resulting in an average amount of $1,711 per transaction), exhibiting a growth rate of around 100% in the last 30 days (in terms of both number of transactions and transacted amounts).

Chart 20 | Payments by transfer
Values accumulated since November 29



Source: BCRA

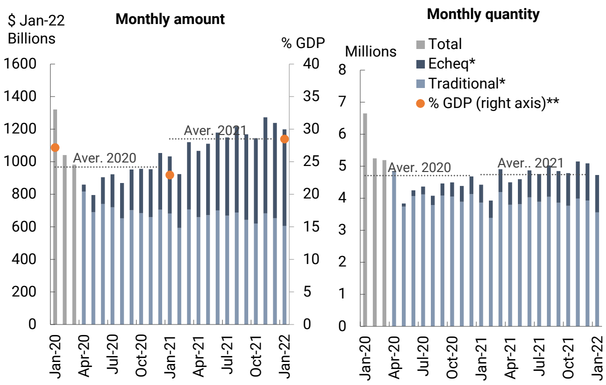
In January 2022, in line with the seasonal factors inherent in this period, there was a

17 For further detail, see [Press Release of January 22, 2022](#) .

decrease in the clearing of checks against the previous month (-7.2% in number and -3.2% in amount in real terms). This performance resulted from the reduction in the use of the physical instruments for transactions, which was offset in part by the slight increase in the clearing of ECHEQs. However, against the same month of 2021, the clearing of checks went up 6.8% in number and 16.1% in amount in real terms; the rise was entirely explained by the electronic format (+106.8% in number and +69.1% in amount in real terms). Thus, during January, the share of ECHEQs in total clearing continued to go up, and accounted for 24.7% in number (+11.9 p.p. y.o.y.) and 49.5% in amount in real terms (+15.5 p.p. y.o.y., see Chart 21).

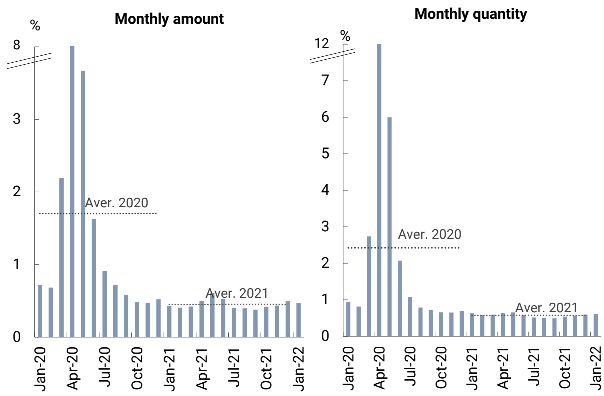
In early 2022, the ratio of bounced checks for insufficient funds, in terms of total cleared checks,[18] did not post significant changes against December 2021 (+0.01 p.p. to 0.6% in number and -0.03 p.p. to 0.5% in amount, see Chart 22). This ratio stood at levels similar to those recorded in the same month of the year before (-0.03 in number and +0.04 p.p. in amount).

Chart 21 | Cleared checks



Source: BCRA. *Desegregation available from Apr-20. **Three-month moving average annualized in terms of nominal GDP estimated for the same period, Not-seasonally adjusted.

Chart 22 | Bounced checks for insufficient funds



Source: BCRA. Note: Including bouncing of traditional checks and Echeqs.

18 It considers both physical instruments and electronic checks.