

Credit Opinion: Sparebanken Oest

Global Credit Research - 07 Mar 2014

Drammen, Norway

Ratings

CategoryMoody's RatingOutlookStableBank DepositsBaa1/P-2Bank Financial StrengthC-Baseline Credit Assessmentbaa2Adjusted Baseline Credit Assessmentbaa2

Contacts

Analyst Phone
Kim Bergoe/London 44.20.7772.5454

Richard (Blake) B. Foster/London

Simon Harris/London

Key Indicators

Sparebanken Oest (Consolidated Financials)[1]

-par-suarment -sect (-en-en-auteur : maineran-s/[-]						_
	[2] 12-13	[2] 12-12	[2] 12-11	[2] 12-10	[2] 12-09	Avg.
Total Assets (NOK billion)	31.1	29.6	28.5	24.7	22.0	[3] 9.1
Total Assets (EUR million)	3,717.5	4,039.4	3,678.3	3,173.6	2,650.4	[3]8.8
Total Assets (USD million)	5,122.5	5,325.5	4,775.0	4,257.5	3,802.7	[3]7.7
Tangible Common Equity (NOK billion)	2.2	2.1	1.8	1.8	1.6	[3] 8.9
Tangible Common Equity (EUR million)	263.4	279.4	237.8	235.1	189.2	[3]8.6
Tangible Common Equity (USD million)	363.0	368.4	308.7	315.4	271.4	[3] 7.5
Net Interest Margin (%)	1.9	1.8	1.7	1.9	2.1	[4]1.9
PPI / Average RWA (%)	2.7	2.7	1.9	3.1	3.5	[5] 2.8
Net Income / Average RWA (%)	1.9	1.8	1.3	2.4	2.4	[5] 2.0
(Market Funds - Liquid Assets) / Total Assets (%)	37.6	30.3	40.7	40.5	35.6	[4]36.9
Core Deposits / Average Gross Loans (%)	51.7	51.8	42.5	42.6	43.1	[4] 46.3
Tier 1 Ratio (%)	15.8	14.8	14.2	15.4	14.2	[5] 14.9
Tangible Common Equity / RWA (%)	14.2	13.9	13.2	15.2	13.4	[5] 14.0
Cost / Income Ratio (%)	41.5	42.3	54.2	45.2	41.0	[4] 44 .8
Problem Loans / Gross Loans (%)	1.9	1.9	1.8	1.8	1.5	[4]1.8
Problem Loans / (Equity + Loan Loss Reserves) (%)	17.3	17.5	18.1	16.5	14.1	[4]16.7
Source: Moody's						

[1] All figures and ratios are adjusted using Moody's standard adjustments [2] Basel II; IFRS [3] Compound Annual Growth Rate based on IFRS reporting periods [4] IFRS reporting periods have been used for average calculation [5] Basel II & IFRS reporting periods have been used for average calculation

Opinion

SUMMARY RATING RATIONALE

Sparebanken Øst's C- standalone bank financial strength rating (BFSR), which is equivalent to a standalone credit

assessment of baa2, primarily reflects the bank's retail focus, its success in recovering from its issues during the financial crisis, and its established regional franchise in the south-eastern Norway (encompassing the Greater Oslo area). Its rating is constrained by its high credit risk concentrations, reliance on market funding, and and the strong competition in its home region in particular.

Sparebanken Øst's current global local currency (GLC) deposit rating of Baa1 receives a one-notch uplift from its baa2 standalone credit assessment. This is based on our assessment of a moderate probability of systemic support for the bank if necessary, in light of the Norwegian government's strong ability to extend support to the domestic financial sector and Sparebanken Øst's modest regional and limited national importance.

Rating Drivers

- Solid regional franchise in south-eastern Norway but marginal national market position
- Deposit increases continue although wholesale funding reliance remains
- Currently sound asset quality underpinned by retail focus and supportive macroeconomic environment. Risks stem from its sizeable exposure to the real estate sector and high borrower concentration
- Profitability helped by margin increases across the country. Intense competition in local market likely to make further margin increases difficult
- High capital ratios compared to its peer Norwegian rated savings banks

Rating Outlook

The outlook on all ratings is stable.

What Could Change the Rating - Up

Upward pressure on the bank's ratings could arise from: (1) improved franchise strength in its home markets without a material increase in risk; (2) a continuation of the focus on core business; (3) a sustained improvement in profitability; and/or (4) maintaining the currently low problem loan level.

What Could Change the Rating - Down

The bank's standalone ratings could be negatively affected by a deterioration in financial flexibility, particularly adverse developments in asset quality. Erosion of the bank's market position, any increase in its overall risk profile or a deteriorating liquidity position could also exert downward pressure on the rating.

In addition, we believe that downward pressure could be exerted on the ratings due to external factors, such as less supportive macroeconomic environment and/or substantially adverse developments in the Norwegian real-estate market.

The bank's GLC deposit rating could be downgraded if (1) the standalone credit assessment deteriorates; or (2) our current assessment of the probability of systemic support for the bank declines.

DETAILED RATING CONSIDERATIONS

SOLID REGIONAL FRANCHISE IN SOUTH-EASTERN NORWAY BUT MARGINAL NATIONAL MARKET POSITION

Sparebanken Øst benefits from a well-established market position in the lower Buskerud County of south-eastern Norway. Whilst its market share in this county is material (we estimate it at around 6% by loans), this falls to around 1.5% if we include the greater Oslo and Akershus areas, in which Sparebanken Øst also operates. We also note that the close proximity of the bank's home region to Oslo means that many Norwegian banks are operational in the area. The bank's market share on a national basis is small at around 0.6% by loans. In recent years, the bank has increasingly used the internet as an additional distribution channel: it provides mortgages through DinBANK.no, targets young customers through YoungBank.no and collects deposits through Topprente.no, which are less concentrated on the bank's home county.

The bank offers clients a wide product range via an open-architecture model: it is part owner of companies established with other independent savings banks, such as Frende (life and non-life insurance products) and Norne Securities (securities company). We view these initiatives positively as they increase cross-selling

opportunities for Sparebanken Øst and provide alternative revenue streams.

Overall, we positively view the bank's attempts to widen its operating area, but caution that the capital region remains highly competitive as large domestic and foreign banks are keen to gain and maintain their presence there. Therefore, we caution that the bank's franchise could come under pressure, especially outside of its key operating areas, where it benefits from local knowledge of customers' needs and the economy.

DEPOSIT INCREASES CONTINUE ALTHOUGH WHOLESALE FUNDING RELIANCE REMAINS

Deposits comprised almost 45% of Sparebanken Øst's total funding at end-2013, a significant improvement on the end-2011 figure of 34%, but still at the lower end of our rated Norwegian savings banks. The 30% deposit growth rate seen over 2012 was not repeated during 2013, but at 7% was still meaningful and partly attributable to Sparebanken Øst's internet website Topprente.no, which offers competitive savings rates to retail customers. Whilst we view positively the increased deposit base, we caution that such deposits may be more price sensitive and therefore less sticky.

Constituting 55% of total funding at end-2013, Sparebanken Øst remains reliant on market funds, and therefore sensitive to fluctuations in investor sentiment. Positively, we note that funding with a maturity shorter than a year accounted for 11% of market funds at end-2013, down from 16% at end-June 2013. A relatively large and growing part of Sparebanken Øst's market funding consists of covered bonds issued via its wholly-owned covered bond company, Sparebanken Øst Boligkreditt, with this source of funding representing 44% at end 2013, compared with 35% at year-end 2012, 27% at year-end 2011 and just 10% at year-end 2010. Whilst we positively view the bank's access to the covered bond market, we caution that extensive use of covered bond funding causes structural subordination of Sparebanken Øst's unsecured creditors, including depositors.

Mitigating its high reliance on market funds, Sparebanken Øst holds a relatively large liquidity buffer. At end 2013, liquid assets increased to around NOK3.9 billion or 12% of total assets and consisted of cash, government and government-related bonds and covered bonds.

CURRENTLY SOUND ASSET QUALITY UNDERPINNED BY RETAIL FOCUS AND SUPPORTIVE MACROECONOMIC ENVIRONMENT. RISKS STEM FROM ITS SIZEABLE EXPOSURE TO THE REAL ESTATE SECTOR AND HIGH BORROWER CONCENTRATION

At end-2013, problem loans (defined as gross loans in default and non-performing loans that are not in default) accounted for around 1.9% of gross loans, which is in line with levels reported by most other rated Norwegian savings banks, indicating the generally supportive macroeconomic environment in Norway.

Sparebanken Øst's loan book is underpinned by a large and increasing proportion of retail loans, mostly in the form of mortgages, accounting for over 80% of total loans at end 2013 (of which around 40% are part of Sparebanken Øst Boligkreditt's cover pool). This asset class has been more resilient historically but we believe that its performance could be undermined by less favourable interest rate and house price levels, especially given households' high indebtedness.

In our view a major risk to the bank's asset quality is the significant industry concentration towards the property management and construction sectors, which accounted for around 12% of total loans at end-2013, although we view the reduction in these sectors positively. The bank's corporate loan book exhibits high borrower concentration, which could accelerate the extent and pace of any asset quality deterioration.

We also note that Sparebanken Øst experienced brisk loan growth in 2010-11 (2011:+14%; 2010:+17%) and we believe that rapid loan growth can be an indication of aggressive lending practices or overheating in some segments. 2012 growth was much lower at 2% (including a 7% reduction in real estate exposure) whilst in 2013, lending to the corporate segment was further reduced by 12% and retail loans grew by 21%. We also note that the bank is increasing lending outside of the bank's main operating area.

Although risk management practices are adequate for the level and type of risk in the bank, they lack the sophistication of many larger players in the Nordic region. Over the most recent years the bank has made efforts to strengthen the risk management, in particular in relation to investments which we view positively. Sparebanken Øst's investment portfolio, which caused significant losses in 2008, has now been run.

PROFITABILITY HELPED BY MARGIN INCREASES ACROSS THE COUNTRY. INTENSE COMPETITION IN LOCAL MARKET LIKELY TO MAKE FURTHER MARGIN INCREASES DIFFICULT

Sparebanken Øst's main source of income is net interest income, which represented over 80% of its 2013

operating income. In 2013 this source of income was supported by strong loan volume growth as well as improved lending margins across the banking system. We expect slower margin increases across the Norwegian banking market and that keen competition in Sparebanken Øst's main area of operation will further constrain future margin increases, although we note that Sparebanken Øst's profitability is at the higher end of the savings bank peer group. We also expect deposit margins will continue to be squeezed and weigh on the bank's top-line profitability.

Fair value adjustments in the securities portfolio of NOK26.4 million contributed positively to revenue in 2013 (2012: NOK62.3 million). Whilst the successful run-off of Sparebanken Øst's investment portfolio will limit the volatility going forward, we note that a sizeable part of the value changes in the two past years were related to Sparebanken Øst's stake in Eksportfinans (Ba3 negative).

Loan loss provisions remained contained at NOK16 million in 2013 (2012: NOK25 million). While we believe future developments are uncertain, we do not foresee levels as elevated as in 2008 (NOK245 million), especially as the bank has now run off its portfolio of loans to Icelandic and Eastern Europe financial institutions.

Although we acknowledge the bank's cost efficiency is good (2013 cost-to-income: 41%), partly because it avoids the fixed costs of product manufacturing through taking minority shares in its product development companies, we believe that cost containment might prove to be more difficult as an independent bank going forward.

HIGH CAPITAL RATIOS COMPARED TO ITS PEER NORWEGIAN RATED SAVINGS BANKS

At end-2013 Sparebanken Øst reported Tier 1 and total capital ratios of 15.8% and 18.4%, respectively (standardised approach). These levels are among the highest among Moody's-rated Norwegian banks and show an improvement compared to the previous year primarily due to issuance of a subordinated loan of NOK150 million and fund notes NOK200 million in October 2013.

NOTE ON DATA

Unless noted otherwise, all figures shown in this report are sourced from the bank's latest annual and interim financial reports and our Banking Financial Metrics. These metrics are based on our own chart of account, and are adjusted for analytical purposes. Please refer to the documents entitled "Moody's Approach to Global Standard Adjustments in the Analysis of the Financial Statements of Banks, Securities Firms and Finance Companies" and "Frequently Asked Questions: Moody's Approach to Global Standard Adjustments in the Analysis of the Financial Statements of Banks, Securities Firms and Finance Companies", both published on 19 July 2012.

Global Local Currency Deposit Rating (Joint Default Analysis)

Moody's assigns a GLC deposit rating of Baa1 to Sparebanken Øst. The rating is supported by the bank's baa2 standalone credit assessment and the Aaa local currency deposit ceiling of Norway, which we consider the underlying support provider. As a result of Sparebanken Øst's importance to its region and the region's importance to the national economy of Norway, we assess a moderate probability of systemic support for the bank in the event of a stress situation. Consequently, there is a one-notch uplift for the GLC deposit rating from the bank's standalone credit assessment. We are however likely to gradually reduce systemic support uplift as regulators globally consider implementing bank resolution regimes.

Foreign Currency Deposit Rating

The Baa1 foreign currency deposit rating is unconstrained given that Norway has a country ceiling of Aaa.

ABOUT MOODY'S BANK RATINGS

Bank Financial Strength Rating

Moody's Bank Financial Strength Ratings (BFSRs) represent Moody's opinion of a bank's intrinsic safety and soundness and, as such, exclude certain external credit risks and credit support elements that are addressed by Moody's Bank Deposit Ratings. BFSRs do not take into account the probability that the bank will receive such external support, nor do they address risks arising from sovereign actions that may interfere with a bank's ability to honour its domestic or foreign currency obligations. Factors considered in the assignment of BFSRs include bank-specific elements such as financial fundamentals, franchise value, and business and asset diversification. Although BFSRs exclude the external factors specified above, they do take into account other risk factors in the bank's operating environment, including the strength and prospective performance of the economy, as well as the structure and relative fragility of the financial system, and the quality of banking regulation and supervision.

Global Local Currency Deposit Rating

A deposit rating, as an opinion of relative credit risk, incorporates the BFSR as well as Moody's opinion of any external support. Specifically, Moody's Bank Deposit Ratings are opinions of a bank's ability to repay punctually its deposit obligations. As such, they are intended to incorporate those aspects of credit risk relevant to the prospective payment performance of rated banks with respect to deposit obligations, which includes: intrinsic financial strength, sovereign transfer risk (in the case of foreign currency deposit ratings), and both implicit and explicit external support elements. Moody's Bank Deposit Ratings do not take into account the benefit of deposit insurance schemes which make payments to depositors, but they do recognise the potential support from schemes that may provide assistance to banks directly.

According to Moody's joint default analysis (JDA) methodology, the global local currency deposit rating of a bank is determined by the incorporation of external elements of support into the bank's Baseline Credit Assessment. In calculating the Global Local Currency deposit rating for a bank, the JDA methodology also factors in the rating of the support provider, in the form of the local currency deposit ceiling for a country, Moody's assessment of the probability of systemic support for the bank in the event of a stress situation and the degree of dependence between the issuer rating and the Local Currency Deposit Ceiling.

National Scale Rating

National scale ratings are intended primarily for use by domestic investors and are not comparable to Moody's globally applicable ratings; rather they address relative credit risk within a given country. An Aaa rating on Moody's National Scale indicates an issuer or issue with the strongest creditworthiness and the lowest likelihood of credit loss relative to other domestic issuers. National Scale Ratings, therefore, rank domestic issuers relative to each other and not relative to absolute default risks. National ratings isolate systemic risks; they do not address loss expectation associated with systemic events that could affect all issuers, even those that receive the highest ratings on the National Scale.

Foreign Currency Deposit Rating

Moody's ratings on foreign currency bank obligations derive from the bank's local currency rating for the same class of obligation. The implementation of JDA for banks can lead to high local currency ratings for certain banks, which could also produce high foreign currency ratings. Nevertheless, it should be noted that foreign currency deposit ratings are in all cases constrained by the country ceiling for foreign currency bank deposits. This may result in the assignment of a different, and typically lower, rating for the foreign currency deposits relative to the bank's rating for local currency obligations.

Foreign Currency Debt Rating

Foreign currency debt ratings are derived from the bank's local currency debt rating. In a similar way to foreign currency deposit ratings, foreign currency debt ratings may also be constrained by the country ceiling for foreign currency bonds and notes; however, in some cases the ratings on foreign currency debt obligations may be allowed to pierce the foreign currency ceiling. A particular mix of rating factors are taken into consideration in order to assess whether a foreign currency bond rating pierces the country ceiling. They include the issuer's global local currency rating, the foreign currency government bond rating, the country ceiling for bonds and the debt's eligibility to pierce that ceiling.

About Moody's Bank Financial Strength Scorecard

Moody's bank financial strength model (see scorecard below) is a strategic input in the assessment of the financial strength of a bank, used as a key tool by Moody's analysts to ensure consistency of approach across banks and regions. The model output and the individual scores are discussed in rating committees and may be adjusted up or down to reflect conditions specific to each rated entity.

Rating Factors

Sparebanken Oest

Rating Factors [1]	Α	В	С	D	Е	Total Score	Trend
Qualitative Factors (50%)						C-	

Factor: Franchise Value						D	Neutral
Market share and sustainability				х		_	
Geographical diversification					x		
Earnings stability			x				
Earnings Diversification [2]							
Factor: Risk Positioning						D	Neutral
Corporate Governance [2]	-	-		-	-		
- Ownership and Organizational Complexity	_						
- Key Man Risk	_						
- Insider and Related-Party Risks	_						
Controls and Risk Management			x				
- Risk Management			х				
- Controls		х					
Financial Reporting Transparency		x					
- Global Comparability	х						
- Frequency and Timeliness	х						
- Quality of Financial Information			х				
Credit Risk Concentration	_	_		_	-		
- Borrower Concentration							
- Industry Concentration							
Liquidity Management					x		
Market Risk Appetite		x					
Factor: Operating Environment						A-	Neutral
Economic Stability		x					
Integrity and Corruption	x						
Legal System	x						
Financial Factors (50%)						C-	
Factor: Profitability						С	Neutral
PPI % Average RWA (Basel II)			2.44%				
Net Income % Average RWA (Basel II)			1.67%				
Factor: Liquidity						Е	Neutral
(Market Funds - Liquid Assets) % Total Assets					36.20%		
Liquidity Management					х		
Factor: Capital Adequacy						Α	Improving
Tier 1 Ratio (%) (Basel II)	14.94%						
Tangible Common Equity % RWA (Basel II)	13.78%						
Factor: Efficiency						В	Neutral
Cost / Income Ratio		46.00%					
Factor: Asset Quality						В	Weakening
Problem Loans % Gross Loans		1.85%					
Problem Loans % (Equity + LLR)		17.65%					
Lowest Combined Financial Factor Score (15%)						E	
Economic Insolvency Override						Neutral	
Aggregate BFSR Score						C-	
Aggregate BCA Score						baa1/baa2	
Assigned BFSR						C-	
Assigned BCA						baa2	

- [1] Where dashes are shown for a particular factor (or sub-factor), the score is based on non-public information. [2] A blank score under Earnings Diversification or Corporate Governance indicates the risk is neutral.



© 2014 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ISSUED BY MOODY'S INVESTORS SERVICE, INC. ("MIS") AND ITS AFFILIATES ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND CREDIT RATINGS AND RESEARCH PUBLICATIONS PUBLISHED BY MOODY'S ("MOODY'S PUBLICATION") MAY INCLUDE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL. FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS AND MOODY'S OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S PUBLICATIONS MAY ALSO INCLUDE QUANTITATIVE MODEL-BASED ESTIMATES OF CREDIT RISK AND RELATED OPINIONS OR COMMENTARY PUBLISHED BY MOODY'S ANALYTICS, INC. CREDIT RATINGS AND MOODY'S PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE. AND CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS AND PUBLISHES MOODY'S PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

MOODY'S CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT INTENDED FOR USE BY RETAIL INVESTORS AND IT WOULD BE RECKLESS FOR RETAIL INVESTORS TO CONSIDER MOODY'S CREDIT RATINGS OR MOODY'S PUBLICATIONS IN MAKING ANY INVESTMENT DECISION. IF IN DOUBT YOU SHOULD CONTACT YOUR FINANCIAL OR OTHER PROFESSIONAL ADVISER.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT.

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the rating process or in preparing

the Moody's Publications.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability to any person or entity for any indirect, special, consequential, or incidental losses or damages whatsoever arising from or in connection with the information contained herein or the use of or inability to use any such information, even if MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers is advised in advance of the possibility of such losses or damages, including but not limited to: (a) any loss of present or prospective profits or (b) any loss or damage arising where the relevant financial instrument is not the subject of a particular credit rating assigned by MOODY'S.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability for any direct or compensatory losses or damages caused to any person or entity, including but not limited to by any negligence (but excluding fraud, willful misconduct or any other type of liability that, for the avoidance of doubt, by law cannot be excluded) on the part of, or any contingency within or beyond the control of, MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers, arising from or in connection with the information contained herein or the use of or inability to use any such information.

NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

MIS, a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MIS have, prior to assignment of any rating, agreed to pay to MIS for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at www.moodys.com under the heading "Shareholder Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

For Australia only: Any publication into Australia of this document is pursuant to the Australian Financial Services License of MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657AFSL 336969 and/or Moody's Analytics Australia Pty Ltd ABN 94 105 136 972 AFSL 383569 (as applicable). This document is intended to be provided only to "wholesale clients" within the meaning of section 761G of the Corporations Act 2001. By continuing to access this document from within Australia, you represent to MOODY'S that you are, or are accessing the document as a representative of, a "wholesale client" and that neither you nor the entity you represent will directly or indirectly disseminate this document or its contents to "retail clients" within the meaning of section 761G of the Corporations Act 2001. MOODY'S credit rating is an opinion as to the creditworthiness of a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail clients. It would be dangerous for "retail clients" to make any investment decision based on MOODY'S credit

rating. If in doubt you should contact your financial or other professional adviser.