MOODY'S ANALYTICS

Understanding IFRS 9 ECL Volatility with the PD Converter Volatility Attribution Tool

James Edwards

January 2019

Scope of Today's Webinar

- The ImpairmentCalc software provides expected credit loss impairment calculations by taking user-defined asset classifications, credit risk measures, and IFRS 9 and CECL guidance to produce loss allowance.
- There are several models within ImpairmentCalc that can cause ECL and associated provisions to change from quarter to quarter.
- » Today we will focus on the role of the Rating to PIT PD Converter on ECL volatility.

Agenda

- 1. Learning How to Interpret the Output of the Volatility Attribution Tool (~35 minutes)
- 2. Hands on Demo of Tool with Examples of Output (~15 minutes)
- 3. Q & A (~10 minutes)



Learning How to Interpret the Output of the Volatility Attribution Tool



Introduction and Overview of Tool

ImpairmentCalc Rating to PIT PD Converter

- The Rating to PIT PD Converter takes as input an agency rating or TTC PD and outputs a up-to-date and forward-looking PITPD for each instrument, based on:
 - Rating Grade
 - Country
 - Industry
- » For more details about the methodology of the Rating to PITPD Converter, please refer to:
 - Chen, Nan, Douglas Dwyer, and Sue Zhang, "Converting Agency Ratings to Point-In-Time PD Term Structure." Moody's Analytics White Paper, March 2017.

Introducing the PIT PD Converter Volatility Attribution Tool

The first major goal of the PIT PD Converter Volatility Attribution Tool is to report the changes in quarterly PITPD output across rating grades, countries, and industries

The second and perhaps even more important goal is to give an understanding of the **factors** that have driven these changes in PD.

Breaking Down Quarterly PD Change into Factors

- The Rating to PIT PD Converter models the relationship between rating and PIT PD:
 - Using country and industry specific data when available
 - Augmenting this data from surrounding regions or broader industry when there is a relative lack of data
- This leads to the drivers of PITPD changes not always being obvious
- In order to provide a rich understanding of what is driving the change in PD output, the tool breaks down the total PD change in three different ways.



Description of PD Change Attribution Breakdowns

Breaking Down Quarterly and Yearly PD Change into Factors

- » PD Change Breakdowns in the Tool:
 - 1. **Model Component Attribution:** Within the modelling specification, which estimated terms are driving the change in PD?
 - 2. **Geographical Attribution:** From what regions are the public firm data driving the change in PD coming from?
 - 3. Risk Factor Attribution: What individual firm risk factors are driving the change in CreditEdge EDF that underlies the PD output?

Model Component Attribution

» PD output for a specific rating, country, and industry can be represented as:

$$PD_{Rating,C,I} = Base_{Rating,Region} + ICT_I + CCT_C$$

- Base: The base model includes an intercept term that allows the overall level of risk to vary based on the EDF data, and a slope term that models the relationship between risk and rating (again to fit the EDF data).
- ICT: the Industry Credit Trend term, which allows for more granular variation in risk within specific industries
- CCT: the Country Credit Trend, which allows for more granular variation in risk with specific countries

Model Component Attribution

» Due to this model specification, we can attribute the total change in PD for a country/industry/rating combination to the changes in the three factors. As an example:

$$PD_{Rating,C,I} = Base_{Rating,Region} + ICT_I + CCT_C$$

Total
ChangeAttribution to
Change in Base ModelAttribution to
Change in ICTAttribution to
Change in ICT+0.08%+0.04%-0.02%+0.06%

» Note that the sum of the three attributions on the right equal the total change on the left.

Model Component Attribution- Examples

2018Q2-2018Q3 Change for Baa3 Firms in Middle East Country Group (Aggregated Across Industry)

| Default Probability | | | Model Component Attribution | | | | |
|----------------------|----------|--------|-----------------------------|--------------|-------|-----------------------------|----------------------------|
| Country | Industry | Old PD | New PD | Change in PD | Base | Industry Credit Trend (ICT) | Country Credit Trend (CCT) |
| Bahrain | | 0.48% | 0.58% | 0.09% | 0.09% | 0.01% | -0.01% |
| Jordan | | 0.53% | 0.70% | 0.17% | 0.09% | 0.01% | 0.07% |
| Kuwait | | 0.57% | 0.70% | 0.14% | 0.09% | 0.01% | 0.03% |
| Oman | | 0.59% | 0.68% | 0.10% | 0.09% | 0.02% | -0.01% |
| Qatar | | 0.60% | 0.68% | 0.08% | 0.09% | 0.02% | -0.03% |
| Saudi Arabia | | 0.36% | 0.51% | 0.14% | 0.08% | 0.01% | 0.05% |
| United Arab Emirates | | 0.54% | 0.63% | 0.09% | 0.09% | 0.01% | -0.01% |

- » Changes are typically spread across the three modelling components.
- » Note that in the countries with largest changes (Jordan, Saudi Arabia), have relatively larger percentage of the change attributed to CCT.

Geographical Component Attribution

» PD output for a specific country draws as much as possible upon EDF data from that country. Because the data is finite, however, inference is drawn from broader country group, region, and world.

» We can therefore think of the output of the PD Converter for a specific country/industry/rating combination as a function of the EDF data from these four different geographic regions:

 $PD_{Rating,C,I} = f(Data_{Country}, Data_{CtryGroup}, Data_{Region}, Data_{World})$

Geographical Component Attribution

 $PD_{Rating,C,I} = f(Data_{Country}, Data_{CtryGroup}, Data_{Region}, Data_{World})$

- The Geographical Attribution attributes the change in PD to data across these four geographical areas:
- 1. **Country**: How would PD output have changed if we had used 2018Q2 data for Country X, but 2018Q1 data for all other geographical areas?
- 2. **Country Group**: How would PD output have *further* changed if we had used 2018Q2 data for Country X's Country Group, but 2018Q1 for all other geographical areas?
- **3. Broad Region**: How would PD output have *further* changed if we had used 2018Q2 data for Country X's Broad Region, but 2018Q1 for all other geographical areas?
- 4. **Global**: How would PD output have *further* changed if we had used 2018Q2 data for the entire globe?

Geographical Component Attribution Example

| | Date of Data for Country | Date of Data for Country Group (excluding Country) | Date of Data for Region (excluding Country Group) | Date of Data for World (excluding Region) | Recalibrated PD Convert Output | Change Attribution |
|---------------------------------------|--------------------------------|--|--|--|--------------------------------------|-----------------------|
| 2018 Q1 Output | 2018 Q1 | 2018 Q1 | 2018 Q1 | 2018 Q1 | 0.44% | |
| Country Attribution | 2018 Q2 | 2018 Q1 | 2018 Q1 | 2018 Q1 | 0.47% | + 0.03% |
| Country Group Attribution | 2018 Q2 | 2018 Q2 | 2018 Q1 | 2018 Q1 | 0.49% | + 0.02% |
| Regional Attribution | 2018 Q2 | 2018 Q2 | 2018 Q2 | 2018 Q1 | 0.50% | + 0.01% |
| Global Attribution/ 2018 Q2 Output | 2018 Q2 | 2018 Q2 | 2018 Q2 | 2018 Q2 | 0.49% | - 0.01% |

» Note that he sum of the change attribution values is equal to the change between the 2018 Q1 Output (0.44%) and the 2018 Q2 Output (0.49%)

Geographical Component Attribution Example

2018Q2-2018Q3 Change for Baa3 Firms in Middle East Country Group (Aggregated Across Industry)

| | | | Default Probat | oility | Geographical Attribution | | | | |
|----------------------|----------|--------|----------------|--------------|--------------------------|---------------|--------------|--------|--|
| Country | Industry | Old PD | New PD | Change in PD | Country | Country Group | Broad Region | Global | |
| Bahrain | | 0.48% | 0.58% | 0.09% | -0.02% | 0.01% | 0.06% | 0.04% | |
| Jordan | | 0.53% | 0.70% | 0.17% | 0.06% | 0.01% | 0.06% | 0.04% | |
| Kuwait | | 0.57% | 0.70% | 0.14% | 0.03% | 0.01% | 0.06% | 0.04% | |
| Oman | | 0.59% | 0.68% | 0.10% | -0.01% | 0.01% | 0.06% | 0.04% | |
| Qatar | | 0.60% | 0.68% | 0.08% | -0.04% | 0.02% | 0.06% | 0.04% | |
| Saudi Arabia | | 0.36% | 0.51% | 0.14% | 0.04% | 0.00% | 0.06% | 0.04% | |
| United Arab Emirates | | 0.54% | 0.63% | 0.09% | -0.02% | 0.01% | 0.06% | 0.04% | |

The more data available in the country and the more the country effect varies from the broader country group or region, the larger the attribution to the country itself.

» Note that this breakdown is in many ways related to the Model Component Attribution, based on the geographical breakdowns in modelling

The PD Converter is calibrated on CreditEdge EDF data. CreditEdge EDF is a Merton-type structural model of default probability. EDF for a specific firm is a function of the "Distance to Default", or how many standard deviations Asset Value must fall to reach the default point.



- » Distance-to-Default can be roughly split in two parts:
- 1. The Inverse of Leverage: How far in absolute terms asset value can fall before it reaches the default point (the default point being a function of debt).
- 2. **Asset Volatility**: A measure of the average size of asset value shocks

$$EDF_i = f(DD_i) \approx f\left(\frac{1/Leverage_i}{Asset Volatility_i}\right)$$

» Since Leverage in this instance is defined as Default Point divided by Equity Value:

$$EDF_i \approx f\left(\frac{1/Leverage_i}{Asset Volatility_i}\right) \approx f\left(\frac{\frac{Equity Value_i}{Default Point_i}}{Asset Volatility_i}\right)$$

» For Risk Factor Attribution, we will attribute the total change in PD converter output to changes in these three risk drivers of the underlying EDF.

- » Interpreting each Risk Factor:
 - Equity Value: Indicates broader credit conditions in a country or region by reflecting how investors are valuing the ownership of firms
 - > Equity values are derived from firm's daily stock prices
 - Default Point: Indicates broader credit conditions in a country or region by reflecting how leveraged the average firm in the industry is
 - > The default point is a function of the firm's liabilities from their financial statements, and incorporates the cost of borrowing
 - Asset Volatility: Indicates broader credit conditions in a country or region by reflecting how much uncertainty or risk there is in firm valuation
 - Asset volatilities are derived from the recent volatility in equity value of the underlying firms

Risk Factor Attribution Example

Similar to the Geographical Attribution, we recalculate PD Converter output through a mixture of last period risk factor values and new period risk factor values.

| | Date of Data for Equity Values | Date of Data for Default Point | Date of Data for Asset Volatility | Recalibrated PD Convert Output | Change Attribution |
|---------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|-----------------------|
| 2018 Q1 Output | 2018 Q1 | 2018 Q1 | 2018 Q1 | 0.44% | |
| Equity Value Attribution | 2018 Q2 | 2018 Q1 | 2018 Q1 | 0.49% | + 0.05% |
| Default Point Attribution | 2018 Q1 | 2018 Q2 | 2018 Q1 | 0.43% | - 0.01% |
| Asset Volatility Attribution | 2018 Q1 | 2018 Q1 | 2018 Q2 | 0.45% | + 0.01% |
| 2018 Q2 Output | 2018 Q2 | 2018 Q2 | 2018 Q2 | 0.49% | |

» Note that unlike Geographical Attribution, we do not perform this exercise sequentially. This is due to interactions between the risk factors in the EDF calculation. These interactions also mean the sum of the partial PD changes in this exercise will not always equal the total change in PD. In the tool, for ease of interpretation we allocate the residual change to preserve the equal summation.

Risk Factor Attribution Example

2018Q2-2018Q3 Change for Baa3 Firms in Middle East Country Group (Aggregated Across Industry)

| | | Default Probat | oility | Risk Factor Attribution | | | |
|----------------------|----------|----------------|--------|-------------------------|--------------|---------------|------------------|
| Country | Industry | Old PD | New PD | Change in PD | Equity Value | Default Point | Asset Volatility |
| Bahrain | | 0.48% | 0.58% | 0.09% | 0.02% | 0.00% | 0.07% |
| Jordan | | 0.53% | 0.70% | 0.17% | 0.05% | 0.04% | 0.09% |
| Kuwait | | 0.57% | 0.70% | 0.14% | 0.01% | 0.00% | 0.12% |
| Oman | | 0.59% | 0.68% | 0.10% | 0.03% | -0.02% | 0.09% |
| Qatar | | 0.60% | 0.68% | 0.08% | 0.02% | -0.01% | 0.07% |
| Saudi Arabia | | 0.36% | 0.51% | 0.14% | 0.05% | 0.02% | 0.07% |
| United Arab Emirates | | 0.54% | 0.63% | 0.09% | 0.05% | 0.00% | 0.05% |

- All three factors affect PD output, but typically the strongest is change in Equity Value (although for the Middle East in this period an increase in Asset Volatility was a major driver of PD increase).
- On a country-wide level, this intuitively makes sense as, quarter-on-quarter, we would not expect to see extreme changes in Default Points and Asset Volatilities except in special cases.

Full Example

2018Q2-2018Q3 Change for Baa3 Firms (Aggregated Across Industry)

| | | Default Probability | | | Model Component Attribution | | Geographical Attribution | | | Risk Factor Attribution | | | | |
|---------|----------|---------------------|--------|--------------|-----------------------------|-------|--------------------------|---------|---------------|-------------------------|--------|--------------|---------------|------------------|
| Country | Industry | Old PD | New PD | Change in PD | Base | ICT | ССТ | Country | Country Group | Broad Region | Global | Equity Value | Default Point | Asset Volatility |
| Turkey | | 0.70% | 1.12% | 0.42% | 0.11% | 0.05% | 0.26% | 0.22% | 0.02% | 0.11% | 0.06% | 0.21% | 0.12% | 0.09% |

- » We see that there was a 0.42% increase in Turkey's average Baa3 PITPD between 2018 Q2 and 2018 Q3
- » On a Model Component Level, more than half of this was attributable to the CCT, indicating that that the risk is being driven by changes in Turkey and/or the South Asia country group.
- » On a Geographical Level we see that the country is the largest driver of the PD change.
- » Finally, in the Risk Factor Attribution, we see that change in the equity values of firms is the strongest risk driver.



Additional Content in Tool

Number of Firms in Data by Country and Industry

- The tool displays the number of firms in each Country, Industry, Country Group, and Region
- » This data gives users a sense of the depth of data in a particular region.
- » Note that countries with no observations in the CreditEdge universe are shown in italics in this and other tabs.

| | | | Total Number of Firms | i - | Number of Rated Firms | | | |
|----------------------|----------|--|-----------------------|----------------------|-----------------------|-----------------------|----------------------|--|
| Country | Industry | Istry Country (Total) Country Group (Total) Broad Region (Total) | | Broad Region (Total) | Country (Rated) | Country Group (Rated) | Broad Region (Rated) | |
| Bahrain | | 32 | 728 | 20220 | 5 | 69 | 645 | |
| Jordan | | 168 | 728 | 20220 | 2 | 69 | 645 | |
| Kuwait | | 151 | 728 | 20220 | 13 | 69 | 645 | |
| Oman | | 70 | 728 | 20220 | 8 | 69 | 645 | |
| Qatar | | 43 | 728 | 20220 | 9 | 69 | 645 | |
| Saudi Arabia | | 174 | 728 | 20220 | 15 | 69 | 645 | |
| United Arab Emirates | | 90 | 728 | 20220 | 17 | 69 | 645 | |

Geographical Breakdown of CCT and ICT

- The CCT term is calculated as a weighted average of data from an individual country and its country group. The more data in the country, the higher weight on that country. The tool provides the percentage weights on country and country group for CCT.
- The ICT term is likewise calculated as the weighted average of data from the country group and region (within the relative industry). The tool also provides this breakdown, additionally breaking out the percentage of data from the country with the country group.

| | | CCT Ma | keup | ICT Makeup | | | | |
|----------------------|----------|---------------|----------|---------------|----------|--------------|--|--|
| Country | Industry | CCT (Country) | CCT (CG) | ICT (Country) | ICT (CG) | ICT (Region) | | |
| Bahrain | | 63% | 37% | 1% | 28% | 71% | | |
| Jordan | | 92% | 8% | 7% | 22% | 71% | | |
| Kuwait | | 91% | 9% | 6% | 23% | 71% | | |
| Oman | | 80% | 20% | 3% | 26% | 71% | | |
| Qatar | | 70% | 30% | 2% | 28% | 71% | | |
| Saudi Arabia | | 92% | 8% | 7% | 22% | 71% | | |
| United Arab Emirates | | 84% | 16% | 3% | 26% | 71% | | |

Historical Trend of PD Output

- » Finally, the tool provides graphical output of the average PD output for each country over the last 12 quarters.
- » Users can change the rating to be graphed, and compare across countries. They can also pick out the specific industries to be graphed.



MOODY'S ANALYTICS



Appendices

Understanding the Model Component Attribution

 $PD_{Rating,C,I} = Base_{Rating,Region} + ICT_I + CCT_C$

- Base Model: Calibrates the relationship between rating and point-in-time PD on a broad geographical and industry basis
 - Overall Level of PD is allowed to vary by broad region (NA, Europe, Japan, and Rest of World) and broad industry (corporates, financials)
 - Slope of PD vs Rating relationship is allow to vary globally by broad industry (corporates, financials)



Example Base Values by Rating

Understanding the Model Component Attribution

 $PD_{Rating,C,I} = Base_{Rating,Region} + ICT_I + CCT_C$

- Industry Credit Trend: Measures the state of each of the 61 industries in the business cycle, by comparing average EDFs of firms in that industry against their 3 year moving average
 - Because of the fine industry granularity, the ICT is calculated on the country group level (rather than varying by individual country within the country group).
 - Due to ICT being fixed within country group, when looking at PD changes aggregated on country level, ICT can indicate overall (non-industry specific) change in country group credit-conditions.

Understanding the Model Component Attribution

 $PD_{Rating,C,I} = Base_{Rating,Region} + ICT_I + CCT_C$

- Country Credit Trend: Measures the state of each of country relative to the business cycle, by comparing average EDFs of firms in that industry against their three-year moving average
 - Where the number of firms with EDFs in the country is low, additional data from the wider country group is used in calculating CCT. The more firms in the country, the higher the weight on the country EDF data (see slide 30 for more information).

Understanding Risk Factor Attribution

» We split the change in EDF for each firm into the change in these 3 risk components:

- 1. Equity Value Change: Reflects the change in Equity Value for the firm, which increase Asset Value and, as an effect, reduces leverage.
 - This indicates broader credit conditions in a country or region by reflecting how investors are valuing the ownership of firms (equity values are derived from firm's daily stock prices).
 - The higher firms are valued, the more buffer they have against negative shocks, and the lower the likelihood of default.
 - An increase in Equity Value will result in a decrease in the firm's EDF.

Understanding Risk Factor Attribution

» We split the change in EDF for each firm into the change in these 3 risk components:

- 2. **Default Point Change:** Reflects the change in Default Point for the firm, which increase the leverage of the firm:
 - This indicates broader credit conditions in a country or region by reflecting how leveraged the average firm in the industry is (the default point is a function of the firm's liabilities from their financial statements).
 - Because interest rates and borrowing costs are included in the default point, this also illustrates changes in the cost of debt servicing.
 - An increase in the Default Point will result in an increase in the firm's EDF.

Understanding Risk Factor Attribution

» We split the change in EDF for each firm into the change in these 3 risk components:

- **3. Asset Volatility Change:** Reflects the change in the expectation of asset volatility for an individual firm in the next year.
 - This indicates broader credit conditions in a country or region by reflecting how much uncertainty or risk there is in firm valuation (these asset volatilities are derived from the recent volatility in equity value of the underlying firms).
 - Since negative shocks in asset value is what leads to defaults, and this is important for predicting default risk in a country or industry.
 - An increase in the firm's Asset Volatility will result in an increase in the firm's EDF.

MOODY'S ANALYTICS

CONTACT US

Moody's Analytics Support MA_Support@moodys.com

moodysanalytics.com

© 2018 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. AND ITS RATINGS AFFILIATES ("MIS") ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES. CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND MOODY'S PUBLICATIONS 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 AND INAPPROPRIATE FOR RETAIL INVESTORS TO USE MOODY'S CREDIT RATINGS OR MOODY'S PUBLICATIONS WHEN MAKING AN 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.

CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT INTENDED FOR USE BY ANY PERSON AS A BENCHMARK AS THAT TERM IS DEFINED FOR REGULATORY PURPOSES AND MUST NOT BE USED IN ANY WAY THAT COULD RESULT IN THEM BEING CONSIDERED A BENCHMARK.

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.

Moody's Investors Service, Inc., 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 Moody's Investors Service, Inc. have, prior to assignment of any rating, agreed to pay to Moody's Investors Service, Inc. 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 "Investor Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

Additional terms 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 investors. It would be reckless and inappropriate for retail investors to use MOODY'S credit ratings or publications when making an investment decision. If in doubt you should contact your financial or other professional adviser.

Additional terms for Japan only: Moody's Japan K.K. ("MJKK") is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly-owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MJKK. MSFJ is not a Nationally Recognized Statistical Rating Organization ("NRSRO"). Therefore, credit ratings assigned by MSFJ are Non-NRSRO Credit Ratings. Non-NRSRO Credit Ratings are assigned by an entity that is not a NRSRO and, consequently, the rated obligation will not qualify for certain types of treatment under U.S. laws. MJKK and MSFJ are credit rating agencies registered with the Japan Financial Services Agency and their registration numbers are FSA Commissioner (Ratings) No. 2 and 3 respectively.

MJKK or MSFJ (as applicable) hereby disclose that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MJKK or MSFJ (as applicable) have, prior to assignment of any rating, agreed to pay to MJKK or MSFJ (as applicable) for appraisal and rating services rendered by it fees ranging from JPY200,000 to approximately JPY350,000,000.

MJKK and MSFJ also maintain policies and procedures to address Japanese regulatory requirements.