# MOODY'S PUBLIC SECTOR EUROPE

#### **CREDIT OPINION**

22 December 2020



#### **RATINGS**

#### Ile-de-France, Region

| Domicile         | France                         |
|------------------|--------------------------------|
| Long Term Rating | Aa2                            |
| Туре             | LT Issuer Rating - Fgn<br>Curr |
| Outlook          | Stable                         |

Please see the <u>ratings section</u> at the end of this report for more information. The ratings and outlook shown reflect information as of the publication date.

#### Contacts

Matthieu Collette +33.1.5330.1040
VP-Senior Analyst

matthieu.collette@moodys.com

Khalil Etienne Janbek +33.1.5330.1036 Associate Analyst

khalil-etienne.janbek@moodys.com

**Sebastien Hay** +34.91.768.8222 *Senior Vice President/Manager* sebastien.hay@moodys.com

#### **CLIENT SERVICES**

| Americas     | 1-212-553-1653  |
|--------------|-----------------|
| Asia Pacific | 852-3551-3077   |
| Japan        | 81-3-5408-4100  |
| EMEA         | 44-20-7772-5454 |

## Region Ile-de-France (France)

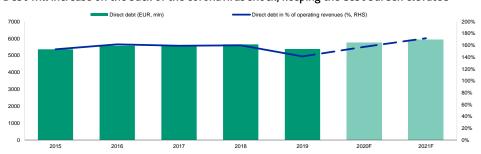
Update to credit analysis

#### **Summary**

The credit profile of Region Ile-de-France (Aa2 stable) reflects its strong financial performance and undisputable market access, which provide shock-absorption capacity against the coronavirus recession. The creditworthiness of Region Ile-de-France is also supported by its strong governance and sophisticated debt management, and its status as the wealthiest region in France. Our assessment also takes into account its high debt levels because of high capital spending, as well as its limited revenue flexibility, as is the case for all French regions.

Exhibit 1

Debt will increase on the back of the coronavirus shock, keeping the debt burden elevated



F - Forecast.
Sources: Région Ile-de-France and Moody's Investors Service

## Credit strengths

- » Very strong operating performance, which provides shock-absorption capacity
- » Status as the wealthiest region in France
- » Sound governance and sophisticated financial management, which underpin its unquestioned market access

## **Credit challenges**

- » A high debt-to-operating revenue ratio, while debt will remain affordable
- » Limited revenue flexibility, like that of all French regions

## **Rating outlook**

The stable outlook reflects our expectation that the region's financial position will remain strong despite the pandemic-induced recession and its market access, unquestioned.

## Factors that could lead to an upgrade

» Because Région Ile-de-France's rating is on par with the <u>Government of France</u>'s (Aa2 stable) rating, an upgrade would require an upgrade of the sovereign rating. However, this is unlikely because the outlook on the sovereign rating is stable.

## Factors that could lead to a downgrade

- » Lower gross operating balance (GOB) levels, combined with higher debt ratios than our forecast, would most likely strain the rating.
- » A weakening of its market access or liquidity, or both, would also be credit negative.
- » A downgrade of France's sovereign rating would strain Région Ile-de-France's rating.

## **Key indicators**

Exhibit 2
Region Ile-de-France

|  | 2014  | 2015  | 2016  | 2017  | 2018  | 2019  | 2020F | 2021F |
|--|-------|-------|-------|-------|-------|-------|-------|-------|
| Gross operating balance / operating revenue (%)      | 21.0  | 20.5  | 22.4  | 24.9  | 27.9  | 33.3  | 27.0  | 22.8  |
| Capital spending / total expenditure (%) [1]         | 38.1  | 37.9  | 37.6  | 38.2  | 38.3  | 40.8  | 41.9  | 48.4  |
| Self-financing ratio ((GOB+capital revenue) / capex) | 0.8   | 0.8   | 1.0   | 0.9   | 1.1   | 1.1   | 0.8   | 0.8   |
| Financing surplus (requirement) / total revenue      | -9.1  | -6.35 | -1.82 | -2.00 | 4.05  | 5.57  | -7.2  | -9.3  |
| Interest expenses / operating revenue (%)            | 3.9   | 3.8   | 3.7   | 3.6   | 3.4   | 3.3   | 3.2   | 3.1   |
| Intergovernmental revenue / operating revenue (%)    | 21.1  | 18.7  | 16.6  | 13.9  | 2.6   | 3.9   | 1.1   | 2.2   |
| Net direct and indirect debt / operating revenue (%) | 148.8 | 153.4 | 161.7 | 159.3 | 160.0 | 141.3 | 157.4 | 172.0 |
|  |       |       |       |       |       |       |       |       |

<sup>(1)</sup> Before debt repayment; F - Forecast. Sources: Region Ile-de-France and Moody's Investors Service

#### **Detailed credit considerations**

The credit profile of Région Ile-de-France, as expressed in a Aa2 stable rating, combines its Baseline Credit Assessment (BCA) of aa2 and a high likelihood of extraordinary support from the French government in the event that the region faces acute liquidity stress.

#### **Baseline Credit Assessment**

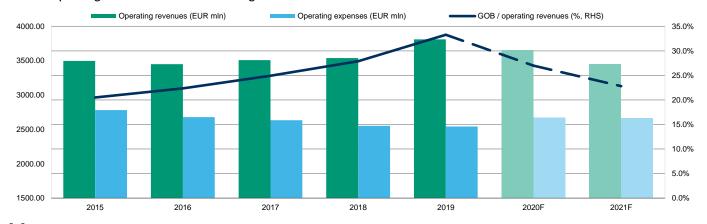
#### Very strong operating performance, which provides shock-absorption capacity

Over the coming two years, we expect Region Ile-de-France to continue to post strong operating surpluses. In 2019, GOB represented 33.3% of operating revenue, and we expect the ratio to remain on average at 25% in 2020-21. While the pandemic-induced economic recession will hurt France's economic growth — negative 10.2% in 2020 according to our forecast, followed by a 5.3% rebound in 2021 — the strain on the region's operating performance will be limited. In 2020, the increase in operating expenditures because of the pandemic will be very limited and operating revenues — excluding previous year's results carried forward — will decrease by only 4.1% thanks to various guarantee mechanisms on tax revenue, including guaranteed proceeds on domestic consumption tax on petroleum products (TICPE) and value-added tax (VAT), which will together amount to €1,48 billion, or 40% of operating revenues. Moreover, the sale of the region's historic headquarters yielded an exceptional revenue of €176 million, further mitigating the impact on its GOB. In 2021, French regions will benefit from an additional support measure, with the central government deciding to offset the delayed impact of the recession on local business tax (CVAE) proceeds, which are received by regions with a one-to-two-year lag¹, by replacing

This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the ratings tab on the issuer/entity page on www.moodys.com for the most updated credit rating action information and rating history.

them with additional VAT proceeds from 2021 onwards. In 2021, Region Ile-de-France is therefore guaranteed to receive €3,172 million in additional VAT proceeds. Afterwards, while the total VAT proceeds to regions will benefit from France's renewed economic growth, the benefit remains uncertain for Region Ile-de-France and will depend on the effective equalisation transfers to be implemented among regions.

Exhibit 3
GOB-to-operating revenue ratio to remain strong at levels above 20% in 2021



F - Forecast.
Sources: Region Ile-de-France and Moody's Investors Service

#### Status as the wealthiest region in France

Région Ile-de-France's economy was constrained by the coronavirus pandemic, particularly through its tourism and events sector. However, its unique economic strength and diversification support its strong potential growth.

As home to France's capital city, Paris, Région Ile-de-France has historically drawn its strength from a combination of political and economic powers. The French financial industry and the country's major transport hub are concentrated in Paris. With 12.2 million inhabitants, Région Ile-de-France is home to 18% of France's metropolitan population, and the average age of its residents is less than the national average. It is the wealthiest region in the country, accounting for 31% of national wealth, or 4% of the European Union's GDP, larger than that of Greater London in the United Kingdom and Lombardy in Italy. The region's 2018 GDP per capita was 1.7x the national GDP per capita. Other socioeconomic indicators are also record better levels than the national averages: for example, the unemployment rate in the region was 6.3% compared with 7.0% for France in the second quarter of 2020.

#### Sound governance and sophisticated financial management underpin unquestioned market access

The regional administration follows a prudent budgetary approach, presenting credible long-term budget targets. The quality of governance and management is high with a clear focus on preserving the region's financial health. Région Ile-de-France also undertakes sophisticated financial management. In 2012, it was one of the first regional and local governments in the world to issue labelled bonds. As of year-end 2020, the region will have €4.3 billion outstanding green and sustainability debt out of its €5.8 billion total debt, which amounts to 75% of total debt. Its June €800 million green and sustainable bond issuance, issued under its €7.0 billion Euro Medium Term Note (EMTN) programme, was massively oversubscribed (over 280% of the issued amount with a strong geographical diversification), which shows that Région Ile-de-France is a highly regarded issuer.

100% 90% 75% 80% 65% 70% 57% 60% 49% 50% 40% 40% 29% 30% 20% 10% 0% 2017 2018 2019 2015 2016 2020E

Exhibit 4

Green and sustainable debt will amount to 75% of Région Ile-de-France's outstanding debt

E- Estimate.
Sources: Région Ile-de-France and Moody's Investors Service

The region also has a €1.0 billion Negotiable European Commercial Paper (NEU-CP) programme and has been issuing negative-rate commercial papers. Therefore, Région Ile-de-France's unquestioned debt market access is a key credit strength and we expect it to remain unchanged. In 2020, the region also has access to €587.0 million of revolving credit facilities to meet its liquidity needs, accessible with a 24-hour notice. Given the support of predictable and regular cash flow, in particular central government transfers and tax revenue, we expect Région Ile-de France's liquidity to remain sound and secure. In 2019, the region drew on the remaining €200 million of committed loans from the European Investment Bank (EIB, Aaa stable), at a 0% interest rate. We expect the region to maintain close ties with the EIB and to continue to benefit from its secure and highly competitive funding as most of the region's capital expenses (including high schools and public transportation) are eligible for loans from the EIB.

#### A high debt-to-operating revenue ratio, while debt will remain affordable

Région Ile-de-France's stock of direct debt amounted to €5.4 billion, or 141% of operating revenue, in 2019 and will remain high in the coming years. We expect the region's direct debt to increase to €5.8 billion, or 157.4% of operating revenue, in 2020 on the back of increased capital expenses in response to the coronavirus pandemic. We expect Région Ile-de-France to disburse €1.9 billion in fixed capital investments in 2020, a 10.5% increase compared with 2019, including supporting measures for small and medium-sized enterprises (SMEs) and targeted spending in other key areas such as professional training, transport and economic development. In 2021, the region's draft budget plans €1.9 billion in capital expenses, entailing a new borrowing of a maximum of €578 million. However, under the framework of the agreement with the central government of jointly supporting the French economy in the aftermath of the coronavirus pandemic, capital expenses could increase by a greater amount. While a further increase in capital spending compared to the 2021 draft budget could lead to greater borrowing needs, we expect the region to optimize all funding sources so as to be able to keep debt under control. In this respect, we expect the region to benefit from additional capital revenues from the European Union's and the central government's economic recovery plans, of amounts over €100 million each.

At the same time, debt will remain affordable, as we expect interest payments — which represented 3.3% of operating revenue in 2019 — to decrease to 3.2% and 3.1% of operating revenue in 2020 and 2021, respectively.

#### Limited revenue flexibility, like that of all French regions

Région Ile-de-France has to contend with limited revenue flexibility. The only fiscal leeway regions have in terms of modulating tax rates is through amending the tax on vehicles. For Région Ile-de-France, the proceeds from this tax represented only 9.5% of operating revenue in 2019.

On the spending side, French regions have greater flexibility, mainly because of the high proportion of capital spending as a share of their total expenses. If needed, Région Ile-de-France can adjust or postpone its commitments in terms of capital spending projects, which accounted for 41% of total expenses as of year-end 2019.

#### **Extraordinary support considerations**

We assign a high level of extraordinary support from the Government of France. This support mainly reflects the strategic role of Région Ile-de-France because of its economic importance, large population, the capital city status of Paris and the region's international reputation. It is also the result of Région Ile-de-France's status as a high-profile and important issuer of bonds in international capital markets.

#### **ESG** considerations

#### How environmental, social and governance risks inform our credit analysis of Région Ile-de-France

We take into account the impact of environmental, social and governance (ESG) factors when assessing sub-sovereign issuers' economic and financial strength. In the case of Région Ile-de-France, the materiality of ESG to its credit profile is as follows:

Environmental risks are not material to Région Ile-de-France's credit profile. Its main environmental risk exposure relates to flooding risk. The territory has experienced major floods in the past (the latest of which was in 2016), but those have had little impact on the region's finances as this responsibility is held at the level of cities and intermunicipalities, with the central government stepping in only in case of a natural disaster.

Social risks are material to Région Ile-de-France's credit profile. First, population dynamics, including a strongly positive natural balance, and secondary school-age population growth, largely explain the funding needs for transport and high schools, which are the two main sources of the region's capital expenses. Second, we regard the pandemic as a social risk under our ESG framework, given the substantial implications for public health and safety. For Région Ile-de-France, the implications are mainly through lower tax revenue and increase in operating expenses.

Governance considerations are material to Région Ile-de-France's credit profile. We assess Région Ile-de-France's governance as sound (score of 1 for the factor 4: governance and management), as illustrated by its prudent budgetary practices and sophisticated debt management.

All of these considerations are further discussed in the "Detailed credit considerations" section above. Our approach to ESG is explained in our cross-sector methodology <u>General Principles for Assessing ESG Risks.</u>

## Rating methodology and scorecard factors

The assigned BCA of aa2 is close to the scorecard-indicated BCA of aa3. The matrix-generated BCA of Région Ile-de-France reflects an Idiosyncratic Risk score of 2 on a scale of 1 to 9, where 1 represents the strongest relative credit quality and 9 the weakest; and a Systemic Risk score of Aa2, as reflected in France's Aa2 stable sovereign bond rating.

The principal methodology used in these ratings was our <u>Regional and Local Governments</u> methodology published in January 2018. Please see the Rating Methodologies page on <u>www.moodys.com</u> for a copy of this methodology.

Exhibit 5
Region Ile-de-France
2019 scorecard

| Rating Factors  |       |        |                      |                  |                  |      |
|---|-------|--------|----------------------|------------------|------------------|------|
| lle-de-France, Region                                 |       |        |                      |                  |                  |      |
| Baseline Credit Assessment                            | Score | Value  | Sub-factor Weighting | Sub-factor Total | Factor Weighting | Tota |
| Scorecard   |       |        |                      |                  |                  |      |
| Factor 1: Economic Fundamentals                       |       |        |                      |                  |                  |      |
| Economic strength                                     | 1     | 169.97 | 70%                  | 1                | 20%              | 0.20 |
| Economic volatility                                   | 1     |        | 30%                  |                  |                  |      |
| Factor 2: Institutional Framework                     |       |        |                      |                  |                  |      |
| Legislative background                                | 1     |        | 50%                  | 3                | 20%              | 0.60 |
| Financial flexibility                                 | 5     |        | 50%                  |                  |                  |      |
| Factor 3: Financial Performance and Debt              |       |        |                      |                  |                  |      |
| Gross operating balance / operating revenues          | 1     | 30.55  | 12.5%                | 3                | 30%              | 0.90 |
| Interest payments / operating revenues (%)            | 5     | 3.38   | 12.5%                |                  |                  |      |
| Liquidity   | 1     |        | 25%                  |                  |                  |      |
| Net direct and indirect debt / operating revenues (%) | 7     | 141.30 | 25%                  |                  |                  |      |
| Short-term direct debt / total direct debt (%)        | 1     | 8.85   | 25%                  |                  |                  |      |
| Factor 4: Governance and Management - MAX             |       |        |                      |                  |                  |      |
| Risk controls and financial management                | 1     |        |                      | 1                | 30%              | 0.30 |
| Investment and debt management                        | 1     |        |                      |                  |                  |      |
| Transparency and disclosure                           | 1     |        |                      |                  |                  |      |
| diosyncratic Risk Assessment                          |       |        |                      |                  |                  | 2(2) |
| Systemic Risk Assessment                              |       |        |                      |                  |                  | Aa2  |
| Suggested BCA   |       |        |                      |                  |                  | aa3  |

Source: Moody's Investors Service

#### Ratings

Exhibit 6

| Category                          | Moody's Rating |
|-----------------------------------|----------------|
| ILE-DE-FRANCE, REGION             |                |
| Outlook                           | Stable         |
| Issuer Rating                     | Aa2            |
| Senior Unsecured                  | Aa2            |
| Commercial Paper -Dom Curr        | P-1            |
| Source: Moody's Investors Service |                |

#### **Endnotes**

1 CVAE proceeds depend on macroeconomic conditions, and because of the way they are paid by businesses, regions receive the proceeds with a one-to-two-year lag. Consequently, the macroeconomic contraction resulting from the pandemic would have severely reduced the CVAE proceeds that regions would have received in 2021 and, to a lesser extent, 2022.

© 2020 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/OR ITS CREDIT RATINGS AFFILIATES ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE
CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND MATERIALS, PRODUCTS, SERVICES AND INFORMATION PUBLISHED BY MOODY'S
(COLLECTIVELY, "PUBLICATIONS") MAY INCLUDE SUCH CURRENT OPINIONS. MOODY'S INVESTORS SERVICE 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 OR IMPAIRMENT. SEE
MOODY'S RATING SYMBOLS AND DEFINITIONS PUBLICATION FOR INFORMATION ON THE TYPES OF CONTRACTUAL FINANCIAL OBLIGATIONS ADDRESSED BY MOODY'S
INVESTORS SERVICE CREDIT RATINGS. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIQUIDITY RISK, MARKET VALUE RISK, OR
PRICE VOLATILITY. CREDIT RATINGS, NON-CREDIT ASSESSMENTS ("ASSESSMENTS"), AND OTHER 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. AND/OR ITS AFFILIATES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS ARE NOT
AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND
PUBLICATIONS AND PUBLISHED ITS 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, ASSESSMENTS, OTHER OPINIONS, AND 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, ASSESSMENTS, OTHER OPINIONS OR 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.

MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND 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 its 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 CREDIT RATING, ASSESSMENT, 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 credit rating, agreed to pay to Moody's Investors Service, Inc. for credit ratings opinions and services rendered by it fees ranging from \$1,000 to approximately \$2,700,000. MCO and Moody's Investors Service also maintain policies and procedures to address the independence of Moody's Investors Service credit ratings and credit rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold credit ratings from Moody's Investors Service and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at <a href="https://www.moodys.com">www.moodys.com</a> 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.

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 credit rating, agreed to pay to MJKK or MSFJ (as applicable) for credit ratings opinions and services rendered by it fees ranging from JPY125,000 to approximately JPY250,000,000.

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

REPORT NUMBER

1254595

#### **CLIENT SERVICES**

 Americas
 1-212-553-1653

 Asia Pacific
 852-3551-3077

 Japan
 81-3-5408-4100

 EMEA
 44-20-7772-5454

