

CREDIT OPINION

21 December 2023

Update



RATINGS

Saxony-Anhalt, Land of

Domicile	Germany
Long Term Rating	Aa1
Туре	LT Issuer Rating - Fgn 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

Harald Sperlein +49.69.70730.906 VP-Senior Analyst

harald.sperlein@moodys.com

Stefan Ritzka +49.69.707.30947

Associate Analyst stefan.ritzka@moodys.com

Massimo Visconti, +39.02.9148.1124

MBA

VP-Sr Credit Officer/Manager massimo.visconti@moodys.com

CLIENT SERVICES

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

Land of Saxony-Anhalt (Germany)

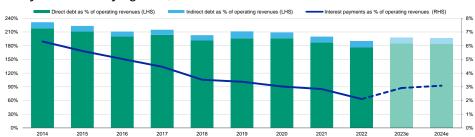
Update to credit analysis

Summary

The credit profile of the Land of Saxony-Anhalt (Aa1 stable) reflects the very supportive federal equalisation system, but also its strong governance and management practices and its excellent capital market access. The rating also takes into account the debt level, which is likely to remain high, with net direct and indirect debt (NDID) at nearly 200% of operating revenue in 2023 (see Exhibit 1). In 2023 and 2024, we expect the Land to achieve balanced financial result, despite economic and tax revenue slowdown and expenditure pressure. Still, the Land has low fiscal flexibility. The credit profile also reflects the very high likelihood that the Government of Germany (Aaa stable) would provide support if the Land were to face acute liquidity stress.

Exhibit 1

Saxony-Anhalt has very high debt, but low interest cost



2023-24e - Moody's estimate. Sources: Issuer, German Statistics Office and Moody's Investors Service

Credit strengths

- » Strong financial equalisation system, which ensures federal transfers and revenue predictability
- » Strong debt management and good capital market access

Credit challenges

- » Budgetary pressure, which weighs on financial performance
- » Very high debt burden
- » Modest tax base, with limited financial flexibility to raise additional revenue

Rating outlook

The stable rating outlook reflects Saxony-Anhalt's capacity to maintain largely balanced budgets and slowly declining debt burdens over the coming two to three years. In case of a deeper and longer economic slowdown than currently expected, strong institutions and governance at the Länder (regions) and national levels are likely contribute to a prompt resumption of strong financial positions.

Factors that could lead to an upgrade

A substantial reduction in the Land's debt burden, combined with an improvement in its financial performance, could lead to a rating upgrade.

Factors that could lead to a downgrade

Saxony-Anhalt's ratings could be downgraded if its fiscal performance and debt burdens deviated significantly and durably from our current projections. This could occur should economic growth deteriorate sharply and the Land were unable to contain the medium-term implications on its fiscal balances and debt burden. In addition, a downgrade of the sovereign rating, or any indication of weakening government support, would likely lead to a rating downgrade of Saxony-Anhalt.

Key indicators

Exhibit 2
Land of Saxony-Anhalt

	2019	2020	2021	2022	2023e	2024e
Population (in mn)	2.2	2.2	2.2	2.2	2.2	2.2
GDP per capita (in EUR)	29,385	29,345	31,381	34,505	37,000	38,000
GDP per capita as % of national average	70.3	71.6	72.6	75.3	75.3	75.3
Intergovernmental revenues as % of operating revenues	29.8	33.2	32.2	29.3	24.5	25.2
Interest payments as % of operating revenues	3.4	3.0	2.8	2.1	2.9	3.1
Gross operating balance (GOB) as % of operating revenues	8.4	0.1	-14.0	12.9	8.9	9.9
Capital expenses (Capex) as % of total expenses	14.5	12.6	10.4	13.1	13.3	13.4
Financing result (surplus or deficit) as % of total revenues	-0.8	-7.9	-19.7	6.7	0.6	1.2
Net direct and indirect debt (NDID) as % of operating revenues	211.4	209.2	199.9	190.8	197.8	196.7
Short-term direct debt as % of total direct debt	13.9	13.7	7.5	12.1	9.3	9.0

2023-24e - Moody's forecast.

Sources: Issuer, German Statistics Office and Moody's Investors Service

Detailed credit considerations

The credit profile of Saxony-Anhalt, as expressed in its Aa1 stable rating, combines a Baseline Credit Assessment (BCA) of aa3 and a very high likelihood of extraordinary support from the federal government in the event that the Land faces acute liquidity stress.

Baseline Credit Assessment

Strong financial equalisation system, which ensures federal transfers and revenue predictability

The institutional framework, which encompasses the legislative background and financial flexibility, is reflected in the arrangements determining intergovernmental relations at all levels, and jurisdictional powers and responsibilities. The framework is mature and highly developed, with minor changes occurring at a measured pace and in a transparent manner.

Germany has one of the strongest equalisation systems worldwide. The German federal constitution guarantees that Länder receive appropriate levels of funding and prescribes high fiscal homogeneity among them. With the amended financial equalisation scheme from 2020, the Länder sector (at the expense of the federal government) benefitted financially because of a higher share in value-added tax revenue, higher general federal transfers and higher supplementary transfers. Under the financial equalisation system,

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

Saxony-Anhalt benefits from special financial subsidies because of its status as a financially relatively weaker region. Intergovernmental revenue makes up nearly one-third of the Land's revenue.

Another institutional factor to align Länder budgets and discipline is a constitutional requirement (debt-brake mechanism) that mandates each region to maintain structurally balanced budgets from 2020.

However, the constitutional requirement had been suspended for several years, reflecting an extraordinary emergency situation, which allowed for debt-funding of measures to alleviate the economic and social impact of the pandemic. More recently and following a <u>Constitutional Court decision on federal level</u>, the Land again claimed for an exception clause for 2023 and 2024 to allow proper use of its previously funded projects via an off-budget entity. At the same time, Saxony-Anhalt is obliged to repay any such additional debt over the coming years.

Strong debt management and good capital market access

Saxony-Anhalt's reporting is transparent, timely and accurate, while budgetary management is characterised by a high degree of prudence. Like other German Länder, the Land shows strong institutional capacity.

Active debt management and sound liquidity ease the burden of Saxony-Anhalt's debt-service requirements and funding needs.

Foreign-currency risks are fully hedged, while the Land's outstanding debt has an average maturity of around nine years. More than 90% of debt has a fixed interest rate, with limited interest rate risk, but there is some exposure to derivatives. The Land actively uses forward interest hedges and thereby has locked in very low interest rates for a significant portion of its maturities.

Saxony-Anhalt's share of short-term debt has been declining over the recent years, from about 20% of direct debt five years ago to less than 10% of direct debt in 2022 and 2023. Saxony-Anhalt has a lower volume of maturing debt, because of its tendency towards longer maturities when refinancing maturing debt in recent years. The utilisation of Saxony-Anhalt's commercial paper (CP) programme, which is a unique feature among German Länder, is low. The Land uses its CP programme to maintain access to various investor groups and invests its excess liquidity at highly rated counterparties, maturing within a year.

The Land has financial relationships with a broad range of investors, which are willing to grant continued access to liquidity based on their confidence in the German Länder solidarity system. In 2023, the Land issued its first Social Bond with a volume of €0.5 billion. The Land committed to allocate the proceeds for a range of social-related initiatives, which attracted additional investor attention. Apart from the allocation of its proceeds, the bond does not differ from bonds and we view the issuance of ESG-linked bonds generally as credit positive as it widens the investor base.

In the money markets, the Land has access to the inter-Länder liquidity pool, whereby individual Länder offer their surplus cash to other Länder, and access to the German state financing agency (BRD Finanzagentur GmbH).

Interest expenses are likely to account for a modest 3% of operating revenue in 2023 and following years, compared with a low 2.1% in 2022. Saxony-Anhalt's overall amortisation profile is relatively balanced, and its access to capital markets is very good, based on a broad set of instruments and a sophisticated state treasury management. Annual debt-service payments are relatively stable and moderate at below 20% of operating revenue.

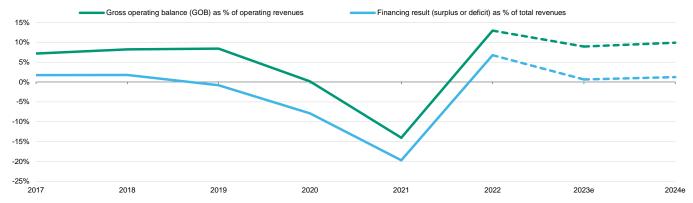
Budgetary pressure weighs on financial performance

In 2023, a stagnating economy and sluggish tax revenue, combined with an additional spending programme and inflation, has put the Land's budget execution under pressure, compared with the financial surplus achieved in 2022. In 2023 and 2024, we expect a gross operating surplus of below 10% of operating revenue, compared with a high 13% in 2022.

Nominal tax revenue is likely to stagnate or slightly decline in 2023 but is likely to grow over the coming three years at 4%-6% each year, while in 2022 and 2021, because of the economic recovery and catch-up effects, tax revenue recorded surprisingly high growth of more than 10% compared with that in 2020, when tax revenue fell as a result of the pandemic and the related slowdown in economic activity.

Our baseline assumption for 2023 and 2024 projects only a fairly balanced financial result, compared with a strong surplus of 7% of total revenue in 2022.

Exhibit 3
The pandemic has put some pressure on operating and financial performance



2023-24e - Moody's estimate.

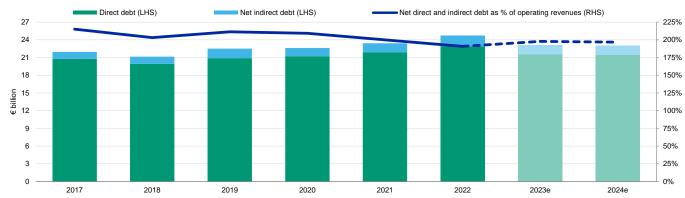
Sources: Issuer, German Statistics Office and Moody's Investors Service

Very high debt burden

The Land's direct debt is likely to remain at a high 185% of operating revenue as of year-end 2023, compared with 177% a year earlier. We expect direct debt to remain at a similar level in 2024, before declining slowly thereafter. The ratio is very high in an international context and is above the German Länder average of 115% as of 2022.

If we include indirect debt (for example, some guarantees), Saxony-Anhalt's NDID ratio is likely to stand at nearly 200% of operating revenue as of year-end 2023, and we expect it to remain at a similar level in 2024, before declining slowly thereafter. The Land's indirect debt mainly consists of guarantees for subsidiary company debt, housing projects, and small and medium-sized businesses.

Exhibit 4
Saxony-Anhalt's debt burden remains very high



2023-24e - Moody's estimate.

Sources: Issuer, German Statistics Office and Moody's Investors Service

Saxony-Anhalt's contingent liabilities are very limited compared with those of most German Länder. The Land holds a relatively low number of participations in companies and other entities, which overall are self-supporting. Saxony-Anhalt holds and provides guarantees to a regional development bank (Investitionsbank Sachsen-Anhalt)¹, which provides services to local small and medium-sized enterprises, supports real estate development and lends to the local government sector.

Similar to those of all German Länder, Saxony-Anhalt's pension obligations are only partially funded. The Land established a pension fund and aims to cover obligations of all newly employed civil servants from 2007. Saxony-Anhalt's unfunded obligations are significantly lower than those of many West German Länder. In general, pension obligations could limit budget flexibility and affect a region's creditworthiness. However, we regard the setup of a pension fund as a forward-looking first step towards addressing the budget impact of unfunded liabilities.

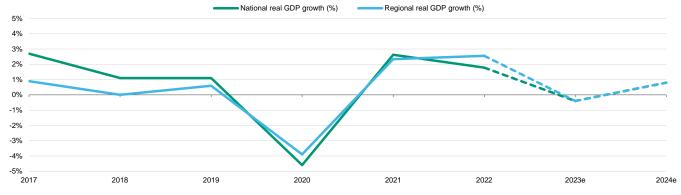
Modest tax base, with limited financial flexibility for raising additional revenue

As is the case for all German Länder, Saxony-Anhalt has a rigid expenditure structure and limited revenue-raising flexibility. Even if its regional tax base grew above the national average, it would have only a limited effect on the Land's budgetary performance. The above-average tax revenue growth would be partly offset by the equalisation system. In general, more than 90% of its revenue stems from shared taxes and transfers, and the German Länder have only limited tax-setting rights.

Saxony-Anhalt's economy is still in transition, but the Land's restructuring efforts are taking effect, as demonstrated by an announcement of the chip manufacturer Intel Corporation (A2 negative) to build a factory close to Saxony-Anhalt's capital city Magdeburg. Meanwhile GDP growth in recent years has been more in line with the national average (see Exhibit 4). The Land's total GDP accounts for only 2% of Germany's national GDP, and Saxony-Anhalt's per capita GDP is around 70% of the German average.

In 2023, we expect an economic contraction of -0.4% for Germany, while in the following two years we expect a recovery of 1% or 2%, respectively. The slower-than-previously-expected post-pandemic recovery is mainly a result of the Russia-Ukraine military conflict, affecting the German industrial sector's exposure to higher energy prices, broader supply chain disruption and a drop in household consumption.

Exhibit 5
Saxony-Anhalt's economy has been somewhat less burdened by the pandemic unlike Germany as a whole



2023-24e - Moody's forecast.

Sources: Issuer, German Statistics Office and Moody's Investors Service

Saxony-Anhalt has had a longer period of adverse demographics when migration outflows had contributed to comparatively adverse age structure. The pace of outward migration has slowed, although it remains potentially negative for the economy and for the budget because both the original tax base and transfer payments are based on population figures. An ageing population will lead to economic (declining labour supply reducing revenue) and expenditure (higher pension and other social costs) pressures, which are among the social risks faced by Saxony-Anhalt.

Extraordinary support considerations

The very high likelihood of extraordinary support from the Federal Government of Germany reflects our assessment of the high reputational risk for Germany as a whole in case of default by a Land, and the Bundestreuekonzept, according to which all German Länder must express mutual solidarity in the event that one of them or the Federal Republic faces a severe budgetary crisis. Also, the debt volumes and structure of German Länder are extremely complex and an event of nonpayment would be considered to have a corresponding impact on Germany as a whole. The principle of solidarity is firmly entrenched in the Grundgesetz (basic law), thereby providing a reassurance that, if required, financial support for a member in distress would be forthcoming. We have, therefore, incorporated two notches of uplift, to Aa1 from aa3, into Saxony-Anhalt's final rating.

ESG considerations

Saxony-Anhalt, Land of's ESG credit impact score is CIS-2

Exhibit 6
ESG credit impact score



Source: Moody's Investors Service

The Land of Saxony-Anhalt's ESG Credit Impact Score (CIS-2) reflects neutral-to-low exposure to environmental and moderately negative social risk, along with very strong governance and policy effectiveness that mitigates the region's susceptibility to these risks.

Exhibit 7
ESG issuer profile scores



Source: Moody's Investors Service

Environmental

The environmental issuer profile score (**E-2**) reflects neutral-to-low risks for all environmental factors. Despite its traditional high exposure to heavy industries the Land has carbon emission levels somewhat above per capita German average, with Saxony-Anhalt promoting carbon transition schemes.

Social

The social issuer profile score (**S-3**) reflects risks foremost on demographics (which scores highly negative) as well as labour and income (which scores moderately negative), somewhat counterbalanced by broadly neutral-to-low risks from most other social factors, except for health and safety (which scores positive). The main risk is driven by the region's relatively adverse demographics with migration and age structure weaker than for Germany overall. The trend of ageing population will result in declining labour supply and higher pension and social cost.

Governance

The governance issuer profile score (**G-1**) reflects the very strong national institutional and governance framework. Budgetary discipline in Germany is a constitutional requirement, which requires each of the regions to maintain structurally balanced budgets. Budget planning in Saxony-Anhalt is prudent, transparent and highly predictable.

ESG Issuer Profile Scores and Credit Impact Scores for the rated entity/transaction are available on Moodys.com. In order to view the latest scores, please click here to go to the landing page for the entity/transaction on MDC and view the ESG Scores section.

Rating methodology and scorecard factors

The assigned BCA of aa3 is close to the scorecard-indicated BCA of aa2. The matrix-generated BCA of aa2 reflects an Idiosyncratic Risk score of 3 (presented below) on a 1-9 scale, where 1 represents the strongest relative credit quality and 9 the weakest; and a Systemic Risk score of Aaa, as reflected in the sovereign bond rating of Germany.

For details about our rating approach, please refer to <u>Rating Methodology: Regional and Local Governments</u>, published on 16 January 2018.

Exhibit 8
Saxony-Anhalt, Land of
Regional & Local Governments

Baseline Credit Assessment – Scorecard	Score	Value	Sub-factor Weighting	Sub-factor Total	Factor Weighting	Total
Factor 1: Economic Fundamentals				6.60	20%	1.32
Economic Strength [1]	9	74%	70%			
Economic Volatility	1		30%			
Factor 2: Institutional Framework		,		3	20%	0.60
Legislative Background	1	,	50%			
Financial Flexibility	5		50%		,	
Factor 3: Financial Position				3.75	30%	1.13
Operating Margin [2]	5	3.39%	12.5%	-		
Interest Burden [3]	3	2.45%	12.5%			
Liquidity	1	,	25%			
Debt Burden [4]	7	190.78%	25%			
Debt Structure [5]	3	12.09%	25%			
Factor 4: Governance and Management				1	30%	0.30
Risk Controls and Financial Management	1				,	
Investment and Debt Management	1					
Transparency and Disclosure	1	,				
Idiosyncratic Risk Assessment		,				3.35 (3)
Systemic Risk Assessment		,				Aaa
Suggested BCA		,				aa2
Assigned BCA						aa3

- [1] Local GDP per capita as % of national GDP per capita
- [2] Gross operating balance/operating revenues
- [3] Interest payments/operating revenues
- [4] Net direct and indirect debt/operating revenues
- [5] Short-term direct debt/total direct debt

Source: Moody's Investors Service; Fiscal 2022.

Ratings

Exhibit 9

Category	Moody's Rating		
SAXONY-ANHALT, LAND OF			
Outlook	Stable		
Baseline Credit Assessment	aa3		
Issuer Rating	Aa1		
Senior Unsecured	Aa1		
Commercial Paper -Dom Curr	P-1		
Other Short Term -Dom Curr	(P)P-1		
Source: Moody's Investors Service			

Endnotes

1 We do not count guarantees provided for Investitionsbank Sachsen-Anhalt as indirect debt as we view them as contingent liabilities.

© 2023 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 CREDIT RATINGS AFFILIATES ARE THEIR 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 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 APPLICABLE MOODY'S RATING SYMBOLS AND DEFINITIONS PUBLICATION FOR INFORMATION ON THE TYPES OF CONTRACTUAL FINANCIAL OBLIGATIONS ADDRESSED BY MOODY'S CREDIT RATINGS. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: 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 DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND 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 DO NOT COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS, ASSESSMENTS AND OTHER OPINIONS AND PUBLISHES 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 credit 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 \$5,000,000. 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, Inc. 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 — Charter Documents - 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 JPY100,000 to approximately JPY550,000,000.

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

REPORT NUMBER 1384095

