Banks Retail & Consumer Banks New Zealand

Nelson Building Society

Key Rating Drivers

Asset Quality Underpins Ratings: Nelson Building Society's (NBS) Issuer Default Ratings (IDRs) are driven by its Viability Rating (VR). The assigned VR is one notch below its implied VR due to a negative adjustment to reflect a capital ratio lower than its peers. The VR is supported by NBS's leading position in profitability and sound asset quality, which benefit from a larger franchise relative to its New Zealand Non-Bank Deposit Taker (NBDT) peers. Nevertheless, its market share in residential mortgages remains small relative to the overall banking system.

Stable Operating Environment: Fitch Ratings expects the operating environment for New Zealand non-bank deposit takers (NBDTs) to remain stable and consistent with the 'a-' factor score. High household leverage remains a key risk for the banking system, and drives the negative adjustment from the 'aa(cat)' implied operating environment score. We also adjust the score to reflect less stringent regulatory oversight of NBDTs relative to registered banks in the operating environment assessment, resulting in a score one notch below the registered banks.

Asset Quality Remains Sound: Fitch believes the Covid-19 pandemic will have a limited impact on NBS's asset quality, and the society's stage 3 loan ratio will remain stable over the next two years. NBS's assigned factor score of 'bbb' is lower than the implied 'aa' category score due to its higher product and geographic concentration

Profitability Above Peers: We expect NBS's profitability to remain sound and stronger than that of its NBDT peers over the next two years. NBS's net interest margins may narrow modestly in the short term due to intense competition in residential mortgages.

Steady Capital Improvement: We expect a steady improvement in NBS's capital ratios over the medium term. There will be limited pressure on capitalisation from credit growth due to the society's strong profitability and ability to issue capital instruments. The high influence of NBS's capitalisation factor score reflects the negative adjustment on its implied VR.

Fully Deposit Funded: Fitch expects NBS's funding profile to remain reasonably stable over the next two years. The four-year average of its loan/deposit ratio should remain below 90% over the period, which implies an 'a' category score. We have applied a negative adjustment on NBS's funding score of 'bbb-' to reflect the society's lack of access to the Reserve Bank of New Zealand's (RBNZ) liquidity facilities.

Rating Sensitivities

Increased Risk Profile: NBS's Long-Term IDRs and Viability Rating may be downgraded if there is an increase in risk profile – aimed potentially at boosting market share and profitability – that leads to greater volatility in the financial profile through the cycle.

It may be reflected in a combination of: stage 3 loans/gross loans rising above 8% for a sustained period, operating profit/risk-weighted assets falling below 0.5% for a sustained period, the regulatory total capital ratio declining below 9.5% without a credible plan to replenish regulatory capital buffers, and the loans/customer deposits ratio rising to above 100% on a sustained basis.

Limited Upgrade Potential: NBS's ratings may be upgraded – although this appears unlikely in the short term – if the society's credit growth is consistent with its capital generation, resulting in a continued improvement in the regulatory capital ratio to above 15% for a sustained period. At the same time, NBS's core financial metric for asset quality, earnings and profitability, funding and liquidity should remain broadly stable. An improvement in risk controls to be more in line with that of the New Zealand registered banks would also be positive for the ratings.

Ratings

Foreign Currency Long-Term IDR Short-Term IDR	BB+ B
Local Currency	
Long-Term IDR	BB+
Short-Term IDR	В
Viability Rating	bb+
Government Support Rating	ns
Sovereign Risk	
Long-Term Foreign-Currency IDR	AA
Long-Term Local-Currency IDR	AA+
Country Ceiling	AAA
Outlooks	

Long-Term Foreign-Currency Stable IDR Long-Term Local-Currency Stable IDR Sovereign Long-Term Foreign-Currency IDR Sovereign Long-Term Local-Currency IDR

Applicable Criteria

Bank Rating Criteria (November 2021)

Related Research

Fitch Affirms Nelson Building Society at 'BB+'; Outlook Stable (February 2022) Fitch Ratings 2022 Outlook: Asia-Pacific Developed Market Banks (December 2021)

Analysts

Hong, George +61282560345 george.hong@fitchratings.com

Do, Jack +61282560355 jack.do@fitchratings.com

Ratings Navigator

Nelson Building Society					ESG Relevance:		R	Banks atings Navigator			
					Financia	al Profile					
	Operating Environment	Business Profile	Risk Profile	Asset Quality	Earnings & Profitability	Capitalisation & Leverage	Funding & Liquidity	Implied Viability Rating Viability Rating		Government Support Rating	lssuer Default Rating
		20%	10%	20%	15%	25%	10%				
aaa								aaa	aaa	aaa	AAA
aa+								aa+	aa+	aa+	AA+
aa								aa	aa	aa	AA
aa-								aa-	aa-	aa-	AA-
a+								a+	a+	a+	A+
а								а	а	а	A
a-								a-	a-	a-	A-
bbb+								bbb+	bbb+	bbb+	BBB+
bbb								bbb	bbb	bbb	BBB
bbb-								bbb-	bbb-	bbb-	BBB-
bb+								bb+	bb+	bb+	BB+ Sta
bb								bb	bb	bb	BB
bb-								bb-	bb-	bb-	BB-
b+								b+	b+	b+	B+
b								b	b	b	В
b-								b-	b-	b-	В-
ccc+								ccc+	ccc+	ccc+	CCC+
ссс								ссс	ccc	ccc	CCC
ccc-								ccc-	ccc-	ccc-	CCC-
сс								сс	сс	сс	СС
с								с	с	с	с
f								f	f	ns	D or RD

The Key Rating Driver (KRD) weightings used to determine the implied VR are shown as percentages at the top. In cases where the implied VR is adjusted upwards or downwards to arrive at the VR, the KRD associated with the adjustment reason is highlighted in red. The shaded areas indicate the benchmark-implied scores for each KRD.

Banks Retail & Consumer Banks New Zealand

Brief Company Summary

Solid Outlook for Operating Environment

Our economic forecast for New Zealand has improved significantly since the onset of the pandemic. This has been driven largely by the authorities' success in dealing with the health crisis, allowing the domestic economy to reopen quickly. Fitch expects real GDP to have expanded by 5.0% in 2021, and forecasts a further increase of 3.5% in 2022, although there may be some pressure in the near term as an outbreak of the omicron Covid-19 variant gathers pace.

The unemployment rate has fallen to an all-time low of 3.4%, which should provide some support to bank asset quality as the effect of the unwinding of pandemic-related support measures works its way through the economy. Inflation has accelerated, prompting an increase in the cash rate of 50bp in 2H21 by the RBNZ, and we expect a further 75bp of increases in 2022.

House-price growth accelerated significantly through late-2020 and 2021, and could pose a risk to financial stability in the medium term. As a result, the RBNZ reimplemented macroprudential limits that are tighter than those in place prior to the pandemic, and the government enacted policies aimed at moderating price growth. The RBNZ has also flagged additional measures, including debt/income limits, that could be enforced in 2022. New Zealand's high household leverage relative to that of other countries is factored into our operating environment assessment for non-bank deposit takers. Household debt/disposable income was 169% at end-June 2021, a record high for this measure.

We also adjusted the score to reflect less stringent regulatory oversight of non-bank deposit takers relative to banks in our assessment of the operating environment, although the implementation of the Deposit Takers Act from 2023 should result in regulatory oversight transitioning towards levels required for banks. Greater clarity on the implementation timetable is likely in 2022.

Small Franchise with Strong Local Community Links

NBS was established in 1862 in Nelson, New Zealand, to provide housing and personal finance to members of the local communities in the Nelson and Tasman regions. Its lending market share (less than 0.2%) is insignificant in the national context, which is reflected in its Business Profile score of 'bb'. NBS's implied score is in the 'b' category; we have applied a positive adjustment to reflect its consistent business model which focuses on simple products including mortgages.

The majority of NBS's lending is provided to the consumer segment, with residential mortgages making up around two-thirds of the net loan book. We believe NBS will maintain the current loan mix and continue to focus on residential mortgages in its home market.

NBS's management depth and experience is adequate for its size. As a mutual building society, NBS's focus on absolute returns is less intense than publicly listed institutions. The society has no specific quantitative targets, reflecting its key priority to serve its members and community. Nonetheless, profitability has been an important consideration as it enables the society to accumulate capital to continue to support balance-sheet growth.

Underwriting Standards Consistent with Industry

NBS's underwriting standards and serviceability assessment are generally in line with industry practice. All loans are assessed on an amortising basis using an interest rate that is higher than the current advertised rate. Residential mortgages remain the largest segment, accounting for 49% of total assets at end-September 2021. The society's commercial exposures are moderate, and consist mainly of property investment and agriculture lending.

NBS's risk-control and management tools are reasonable for its size. Lending authority is delegated by position and experience. Its operational risk-management approach – including cyber security – appears adequate, and there were no major incidents during 2021.

NBS has no trading activities or foreign-exchange exposure. The society's market risk arises primarily from its fixed-rate lending and borrowings. Loans are managed to relatively short fixed-rate periods, which limits the interest-rate mismatch. Market risk is monitored on a quarterly basis through the treasury committee.



Source: Fitch Ratings, Fitch Solutions

Market Share Sep 21





Source: Fitch Ratings, Reserve Bank of New Zealand, NBS





Banks Retail & Consumer Banks New Zealand

Summary Financials and Key Ratios

	31 Mar 21		31 Mar 20	31 Mar 19	31 Mar 18
	Year end				
	(USDm)	(NZD 000)	(NZD 000)	(NZD 000)	(NZD 000)
	Audited - unqualified	- Audited unqualified	- Audited unqualified	- Audited unqualified	- Audited unqualified
Summary income statement	· · ·	· · ·		· · ·	
Net interest and dividend income	17	24,228.8	21,546.4	18,093.7	15,167.2
Net fees and commissions	1	1,054.4	1,328.1	941.1	866.0
Other operating income	0	419.3	425.2	357.0	359.6
Total operating income	18	25,702.5	23,299.7	19,391.8	16,392.8
Operating costs	8	12,147.0	11,266.8	10,712.6	9,975.2
Pre-impairment operating profit	9	13,555.5	12,032.9	8,679.2	6,417.6
Loan and other impairment charges	1	1,353.7	3,422.9	782.5	878.6
Operating profit	9	12,201.8	8,610.0	7,896.7	5,539.0
Other non-operating items (net)	n.a.	n.a.	n.a.	n.a.	n.a.
Тах	2	3,275.6	2,439.6	2,247.3	1,566.4
Net income	6	8,926.2	6,170.4	5,649.4	3,972.6
Other comprehensive income	n.a.	n.a.	n.a.	n.a.	146.5
Fitch comprehensive income	6	8,926.2	6,170.4	5,649.4	4,119.1
Summary balance sheet					
Assets					
Gross loans	503	719,623.9	680,021.8	641,832.7	558,355.6
- of which impaired	1	1,060.3	874.4	1,150.9	1,589.8
Loan loss allowances	4	5,166.4	4,209.6	1,330.9	1,331.2
Net loans	499	714,457.5	675,812.2	640,501.8	557,024.4
Interbank	156	223,371.5	181,335.9	182,265.0	159,659.1
Derivatives	n.a.	n.a.	n.a.	n.a.	n.a.
Other securities and earning assets	n.a.	n.a.	n.a.	n.a.	n.a.
Total earning assets	655	937,829.0	857,148.1	822,766.8	716,683.5
Cash and due from banks	2	2,464.8	2,464.8	2,142.5	2,677.1
Other assets	5	7,861.7	5,914.9	3,907.6	3,667.8
Total assets	663	948,155.5	865,527.8	828,816.9	723,028.4
Liabilities					
Customer deposits	595	851,227.7	789,081.1	767,946.2	671,721.5
Interbank and other short-term funding	n.a.	n.a.	n.a.	n.a.	n.a.
Other long-term funding	n.a.	n.a.	612.8	n.a.	n.a.
Trading liabilities and derivatives	n.a.	n.a.	n.a.	n.a.	n.a.
Total funding and derivatives	595	851,227.7	789,693.9	767,946.2	671,721.5
Other liabilities	3	4,465.1	2,448.2	2,404.3	2,234.7
Preference shares and hybrid capital	35	50,638.5	39,048.5	29,068.5	24,278.5
Total equity	29	41,824.2	34,337.2	29,397.9	24,793.7
Total liabilities and equity	663	948,155.5	865,527.8	828,816.9	723,028.4
Exchange rate	USE	D1 = NZD1.43082	USD1 = NZD1.6675	USD1 = ZD1.473839 U	JSD1 = NZD1.38831
Source: Fitch Ratings, Fitch Solutions, NBS					

Banks Retail & Consumer Banks New Zealand

Summary Financials and Key Ratios

	31 Mar 21	31 Mar 20	31 Mar 19	31 Mar 18
Ratios (annualised as appropriate)				
Profitability				
Operating profit/risk-weighted assets	1.9	1.4	1.4	1.2
Net interest income/average earning assets	2.8	2.6	2.4	2.4
Non-interest expense/gross revenue	47.3	48.4	55.2	60.9
Net income/average equity	15.3	19.4	20.9	17.1
Asset quality				
Impaired loans ratio	0.2	0.1	0.2	0.3
Growth in gross loans	5.8	6.0	15.0	14.1
Loan loss allowances/impaired loans	487.3	481.4	115.6	83.7
Loan impairment charges/average gross loans	0.2	0.5	0.1	0.2
Capitalisation				
Fitch Core Capital ratio	6.1	5.4	5.2	5.1
Tangible common equity/tangible assets	4.2	3.8	3.5	3.4
Net impaired loans/Fitch Core Capital	-10.3	-10.1	-0.6	1.1
Funding and liquidity				
Gross loans/customer deposits	84.5	86.2	83.6	83.1
Customer deposits/total non-equity funding	94.4	95.2	96.4	96.5
Source: Fitch Ratings, Fitch Solutions, NBS			· · · · ·	

Retail & Consumer Banks New Zealand

Key Financial Metrics – Latest Developments

Asset Quality to Remain Sound

Material weakening appears unlikely, reflecting the stable operating environment in New Zealand. Rising interest rates may pressure borrowers with higher leverage, especially the ones with higher debt-to-income ratios. However, we believe there are sufficient buffers built into NBS's assessment of borrowers' serviceability at origination of the loans to withstand this. NBS's loan-loss provision coverage ratio appears conservative (487% at FYE21), and we expect it to decline moderately in the next two years.

NBS's limited franchise and regional focus leaves its asset quality more susceptible to losses should there be a regional downturn. The concentration risk is reflected in NBS's assigned factor score of 'bbb' which is lower than the implied 'aa' category score.

Leading Peers in Profitability

We expect NBS's profitability to remain the strongest amongst the NBDTs over the next two years, supported by its larger scale and strong credit growth and resulting in a factor score of 'bbb-'. The potential short-term narrowing in the NIM should be counter-balanced by rising interest rates.

Non-interest income accounts for a small portion of NBS's total revenue (approximately 6% during FY21), and is likely to remain flat in the near term, reflecting stable transaction volumes. Higher personnel expenses and investment in systems and compliance should lead to a continued increase in operating expenses in the next two years. Nonetheless, we believe NBS is better positioned to manage a rising cost base, reflecting its larger size among the peer group.

Steady Improvement in Capitalisation

NBS's credit growth is likely to remain strong in the next two years, driven by improved recovery in business activities. We believe there will be limited pressure on capitalisation from credit growth due to the society's strong profitability and ability to issue capital instruments. We expect steady improvement in capital ratios over the medium term, reflecting management's focus on boosting capital buffers.

NBS's capitalisation and leverage score of 'bb' is supported by the society's substantial issuance of perpetual preference shares, which are non-redeemable and non-cumulative capital instruments that can make up 100% of NBS's regulatory capital base. When assessing capitalisation of New Zealand NBDTs like NBS, Fitch uses the Fitch Core Capital (FCC) ratio as the starting point and makes adjustments based on capital buffers available to the institution.

NBS's regulatory minimum capital ratio is 8%, and the society reported a capital ratio of 12.3% at end-September 2021. The regulatory capital ratio is an important measure as it is the only regulatory requirement applied to the NBDTs. The assigned factor score incorporates a positive adjustment to reflect NBS's satisfactory capital buffer above the regulatory minimum.

Stable Funding Profile, Fully Deposit Funded

NBS's funding profile should remain reasonably stable in the next two years. The society is funded entirely by member deposits, which we believe will continue. Deposit growth should remain relatively strong, reflecting ample liquidity in the banking system. However, rising interest rates and reduced monetary stimulus should lead to slower deposit growth over the medium term.

There is a moderate level of individual concentration on NBS's deposit base, although geographic concentration remains high, reflecting its business model. We expect the four-year average of NBS's loan/deposit ratio to remain below 90% over the next two years, which implies a score in the 'a' category. However, we have applied a negative adjustment to NBS's funding score of 'bbb-' to reflect lack of access to the RBNZ's lender-of-last-resort liquidity facilities.





Government/Shareholder Support

Commercial Banks: Government Suppo	ort Rating KRDs			
Typical D-SIB GSR for sovereign's rating level (assuming high propensity)	A or A-			
Actual jurisdiction D-SIB GSR	N/A			
Government Support Rating	ns			
Government ability to support D-SIBs				
Sovereign Rating	AA/ Positive			
Size of banking system	Negative			
Structure of banking system	Neutral			
Sovereign financial flexibility (for rating level)	Neutral			
Government propensity to support D-SIBs				
Resolution legislation	Negative			
Support stance	Negative			
Government propensity to support bank				
Systemic importance	Negative			
Liability structure	Positive			
Ownership	Neutral			
The colours indicate the weighting of each KRD in the	assessment.			

The colours indicate the weighting of each KRD in the assessment.

Higher influence Moderate influence Lower influence

The GSR of 'ns' assigned to NBS reflects our expectation that there is no reasonable assumption of support being forthcoming because of New Zealand's open bank resolution scheme (OBR). NBS is not part of the OBR, which allows for the imposition of losses on depositors and senior debt holders to recapitalise failed institutions. However, Fitch believes that the existence of the scheme, in conjunction with NBS's low systemic importance, makes sovereign support doubtful.

Banks

Ratings Navigator

Overall ESG Scale

Environmental, Social and Governance Considerations

FitchRatings

Nelson Building Society

Credit-Relevant ESG Derivation

Nelson Buildin	g Society has 5 ESG potential rating drivers Nelson Building Society has exposure to compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection	key driver	0	issues	5	
-	(data security) but this has very low impact on the rating. Governance is minimally relevant to the rating and is not currently a driver.	driver	0	issues	4	
		potential driver	5	issues	3	
		not a rating driver	4	issues	2	
		not a rating driver	5	issues	1	

Environmental (E)									
General Issues	E Scor	e Sector-Specific Issues	Reference	Reference E Scale		E Scale			
GHG Emissions & Air Quality	1	n.a.	n.a.	5		How to Read This Page ESG scores range from 1 to 5 based on a 15-level color gradation. Red (5) is most relevant and green (1) is least relevant.			
Energy Management	1	n.a.	n.a.	4		The Environmental (E), Social (S) and Governance (G) tables break out the individual components of the scale. The right-hand box shows the aggregate E, S, or G score. General Issues are relevant across all markets with Sector-Specific Issues unique to a particular industry group. Scores are assigned to each sector-			
Water & Wastewater Management	1	n.a.	n.a.	3		specific issue. These scores signify the credit-relevance of the sector-specific issues to the issuing entity's overall credit rating. The Reference box highlights the factor(s) within which the corresponding ESG issues are captured in Fitch's credit analysis.			
Waste & Hazardous Materials Management; Ecological Impacts	1	n.a.	n.a.	2		The Credit-Relevant ESG Derivation table shows the overall ESG score. This score signifies the credit relevance of combined E, S and G issues to the entity's credit rating. The three columns to the left of the overall ESG score summarize the issuing entity's sub-			
Exposure to Environmental Impacts	2	Impact of extreme weather events on assets and/or operations and corresponding risk appetite & management; catastrophe risk; credit concentrations	Business Profile (incl. Management & governance); Risk Profile; Asset Quality	1		component ESG scores. The box on the far left identifies some of the main ESG issues that are drivers or potential drivers of the issuing entity's credit rating (corresponding with scores of 3, 4 or 5) and provides a brief explanation for the score.			

Social (S)						Classification of ESG issues has been developed from Fitch's sector ratings criteria. The General Issues and Sector-Specific
General Issues	S Score	Sector-Specific Issues	Reference	SS	Scale	Issues draw on the classification standards published by the United
Human Rights, Community Relations, Access & Affordability	2	Services for underbanked and underserved communities: SME and community development programs; financial literacy programs	Business Profile (incl. Management & governance); Risk Profile	5		Nations Principles for Responsible Investing (PRI) and the Sustainability Accounting Standards Board (SASB). Sector references in the scale definitions below refer to Sector as displayed in the Sector Details box on page 1 of the naviator.
Customer Welfare - Fair Messaging, Privacy & Data Security	3	Compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection (data security)	Operating Environment; Business Profile (incl. Management & governance); Risk Profile	4		
Labor Relations & Practices	2	Impact of labor negotiations, including board/employee compensation and composition	Business Profile (incl. Management & governance)	3		
Employee Wellbeing	1	n.a.	n.a.	2		
Exposure to Social Impacts	2	Shift in social or consumer preferences as a result of an institution's social positions, or social and/or political disapproval of core banking practices	Business Profile (incl. Management & governance); Financial Profile	1		

CREDIT-RELEVANT ESG SCALE Governance (G) How relevant are E. S and G issues to the General Issues G Score Sector-Specific Issues Reference G Scale overall credit rating? Highly relevant, a key rating driver that has a significant impact on the rating on an individual basis. Equivalent to "higher" relative importance within Navigator. Operational implementation of strategy Business Profile (incl. Management & governance) 5 anagement Strategy 3 5 Board independence and effectiveness; ownership concentration; protection of creditor/stakeholder rights; legal /compliance risks; business continuity; key person risk; related party transactions Relevant to rating, not a key rating driver but has an impact on the rating in combination with other factors. Equivalent to "moderate" relative importance within Navigator. Business Profile (incl. Management & governance); Earnings & Profitability; Capitalisation & Leverage Governance Structure 4 4 Minimally relevant to rating, either very low impact or actively managed in a way that results in no impact on the entity rating. Equivalent to "lower" relative importance within Navigator. Organizational structure; appropriateness relative to business model; opacity; intra-group dynamics; ownership Group Structure 3 Business Profile (incl. Management & governance) 3 3 Irrelevant to the entity rating but relevant to the sector. Quality and frequency of financial reporting and auditing inancial Transparency 3 Business Profile (incl. Management & governance) 2 2 elevant to the entity rating and irrelevant to the ctor.

Unless otherwise disclosed in this section, the highest level of environmental, social and governance (ESG) credit relevance is a score of 3 - ESG issues are credit neutral or have only a minimal credit impact on the entity, either due to their nature or the way in which they are being managed by the entity. For more information on Fitch's ESG Relevance Scores, visit www.fitchratings.com/esg.

The ratings above were solicited and assigned or maintained at the request of the rated entity/issuer or a related third party. Any exceptions follow below.

DISCLAIMER & DISCLOSURES

All Fitch Ratings (Fitch) credit ratings are subject to certain limitations and disclaimers. Please read these limitations and disclaimers by following this link: https://www.fitchratings.com/understandingcreditratings. In addition, the following https://www.fitchratings.com/rating-definitions-document details Fitch's rating definitions for each rating scale and rating categories, including definitions relating to default. Published ratings, criteria, and methodologies are available from this site at all times. Fitch's code of conduct, confidentiality, conflicts of interest, affiliate firewall, compliance, and other relevant policies and procedures are also available from the Code of Conduct section of this site. Directors and shareholders' relevant interests are available at https://www.fitchratings.com/site/regulatory. Fitch may have provided another permissible or ancillary service to the rated entity or its related third parties. Details of permissible or ancillary service(s) for which the lead analyst is based in an ESMA- or FCA-registered Fitch Ratings company (or branch of such a company) can be found on the entity summary page for this issuer on the Fitch Ratings website.

In issuing and maintaining its ratings and in making other reports (including forecast information), Fitch relies on factual information it receives from issuers and underwriters and from other sources Fitch believes to be credible. Fitch conducts a reasonable investigation of the factual information relied upon by it in accordance with its ratings methodolgy, and obtains reasonable verification of that information from independent sources, to the extent such sources are available for a given security or in a given jurisdiction. The manner of Fitch's factual investigation and the scope of the third-party verification it obtains will vary depending on the nature of the rated security and its issuer, the requirements and practices in the jurisdiction in which the rated security is offered and sold and/or the issuer is located, the availability and nature of relevant public information, access to the management of the issuer and its advisers, the availability of pre-existing third-party verifications such as audit reports, agreed-upon procedures letters, appraisals, actuarial reports, engineering reports, legal opinions and other reports provided by third parties, the availability of independent and competent third- party verification on the partoular jurisdiction of the issuer, and a variety of other factors. Users of Fitch's ratings and reports should understand that neither an enhanced factual investigation nor any third-party verification can ensure that all of the information Fitch relies on in connection with a rating or a report will be accurate and complete. Ultimately, the issuer and atsidies rate responsible for the accuracy of the information they provide to Fitch and to the market in offering documents and other reports. In issuing its ratings and its reports, Fitch must rely on the work of experts, including independent auditors with respect to financial statements and attorneys with respect to legal and tax matters. Further, ratings and forecasts of financial and other information are inherently foro

The information in this report is provided "as is" without any representation or warranty of any kind, and Fitch does not represent or warrant that the report or any of its contents will meet any of the requirements of a recipient of the report. A Fitch rating is an opinion as to the creditworthiness of a security. This opinion and reports made by Fitch are based on established criteria and methodologies that Fitch is continuously evaluating and updating. Therefore, ratings and reports are the collective work product of Fitch and no individual, or group of individuals, is solely responsible for a rating or a report. The rating does not address the risk of loss due to risks other than credit risk, unless such risk is specifically mentioned. Fitch is not engaged in the offer or sale of any security. All Fitch reports have shared authorship. Individuals identified in a Fitch report were involved in, but are not solely responsible for, the opinions stated therein. The individuals are named for contact purposes only. A report providing a Fitch rating is neither a prospectus nor a substitute for the information assembled, verified and presented to investors by the issuer and its agents in connection with the sale of the securities. Ratings may be changed or withdrawn at any time for any reason in the sole discretion of Fitch. Fitch does not provide investment advice of any sort. Ratings are not a recommendation to buy, sell, or hold any security. Fitch receives fees from issuers, insurers, guarantors, other obligors, and underwriters for rating securities. Such fees generally vary from US\$1,000 to US\$75,000 (or the applicable currency equivalent) per issue. In certain cases, Fitch will rate all or a number of issues issued by a particular issuer, or insured or guaranteed by a particular insurer or guaranter, for a single annual fee. Such fees are expected to vary from US\$1,000 to US\$1,500,000 (or the applicable currency equivalent). The assignment, publication, or dissemination of a rating by Fitch shall not constitu

For Australia, New Zealand, Taiwan and South Korea only: Fitch Australia Pty Ltd holds an Australian financial services license (AFS license no. 337123) which authorizes it to provide credit ratings to wholesale clients only. Credit ratings information published by Fitch is not intended to be used by persons who are retail clients within the meaning of the Corporations Act 2001.

Fitch Ratings, Inc. is registered with the U.S. Securities and Exchange Commission as a Nationally Recognized Statistical Rating Organization (the "NRSRO"). While certain of the NRSRO's credit rating subsidiaries are listed on Item 3 of Form NRSRO and as such are authorized to issue credit ratings on behalf of the NRSRO (see https://www.fitchratings.com/site/regulatory), other credit rating subsidiaries are not listed on Form NRSRO (the "non-NRSROs") and therefore credit ratings issued by those subsidiaries are not issued on behalf of the NRSRO. However, non-NRSRO (the "non-NRSROs") and therefore credit ratings issued by those subsidiaries are not listed on Form NRSRO.

Copyright © 2022 by Fitch Ratings, Inc., Fitch Ratings Ltd. and its subsidiaries. 33 Whitehall Street, NY, NY 10004. Telephone: 1-800-753-4824, (212) 908-0500. Fax: (212) 480-4435. Reproduction or retransmission in whole or in part is prohibited except by permission. All rights reserved.