



## Рейтинговое агентство Fitch Ratings подтвердило рейтинги Altyn Bank

15 декабря 2017г. международное рейтинговое агентство Fitch Ratings (далее – «Fitch») объявило о подтверждении долгосрочного рейтинга дефолта эмитента (далее – «РДЭ») в иностранной и национальной валюте АО «Altyn Bank» (Дочернего Банка АО «Народный банк Казахстана») (далее – «Altyn Bank») на уровне «BB», а также решении оставить рейтинги Банка в списке Rating Watch Positive (RWP) – перечне рейтингов на пересмотр с позитивным прогнозом.

Данное рейтинговое действие отражает мнение Fitch, что АО «Народный банк Казахстана», владеющий в настоящее время 100% акций Altyn Bank, окажет дочернему банку поддержку в случае необходимости с учетом небольшого размера банка, а также планируемой продажи мажоритарного пакета акций банка китайскому инвестору – China CITIC Bank Corporation Limited («CNCB»).

АО «Народный банк Казахстана» подписало меморандум о взаимопонимании с CNCB в ноябре 2016 года. Завершение сделки по продаже 60% акций Altyn Bank ожидается в 2018 году.

\*\*\*

АО «Altyn Bank» (ДБ АО «Народный банк Казахстана»), в прошлом - ДБ АО «HSBC Банк Казахстан», присутствует на банковском рынке Казахстана с 1998 года, является универсальным коммерческим банком с широким спектром продуктов и услуг для корпоративных и розничных клиентов. АО «Altyn Bank» имеет 4 филиала в Алматы, Астане, Атырау и Актау и 2 дополнительных отделения в Алматы.

АО «Народный банк Казахстана» является лидирующей финансовой группой и лидирующим розничным банком в Казахстане с самой большой базой клиентов и сетью распространения. Банк развивается как универсальная финансовая группа, предлагая широкий спектр услуг (банковские, услуги по страхованию, лизингу, брокерские и услуги управления активами) своим розничным клиентам, клиентам малого и среднего бизнеса и корпоративным клиентам. Банк также осуществляет свои операции в России, Грузии и Кыргызстане.

[www.altynbank.kz](http://www.altynbank.kz)



## **Fitch Ratings рейтинг агенттігі Altyn Bank рейтингтерін растады**

2017 жылғы 15 желтоқсанда Fitch Ratings халықаралық рейтинг агенттігі (бұдан әрі – «Fitch») эмитент дефолтының «Altyn Bank» АҚ («Қазақстан Халық Банкі» АҚ еншілес банкі) (бұдан әрі – «Altyn Bank») шетел және ұлттық валютасындағы, «BB» деңгейіндегі ұзақ мерзімді рейтингін (бұдан әрі – «ЭДР») растайтындығы, сондай-ақ Банктің рейтингтерін Rating Watch Positive (RWP) тізімінде – қайта қаралатын оңды болжамды рейтингтер тізбесінде қалдыратындығы туралы хабарлады.

Бұл рейтинг әрекеті қазіргі уақытта Altyn Bank-тің 100% акциясына ие «Қазақстан Халық Банкі» АҚ-ның банктің үлкендігінің шағын екендігін, сондай-ақ банк акцияларының мажоритарлық пакетінің қытайлық инвестор China CITIC Bank Corporation Limited-ке («CNCB») жоспарланған сатылымын ескере отырып, қажет болған жағдайда еншілес банкке қолдау көрсетеді деген Fitch-тің пікірін білдіреді.

«Қазақстан Халық Банкі» АҚ 2016 жылғы қарашада CNCB-мен өзара түсіністік туралы меморандумға қол қойды. Altyn Bank-тің 60% акциясының сатылуы жөніндегі мәміленің аяқталуы 2018 жылы күтіледі.

\*\*\*

«Altyn Bank» АҚ («Қазақстан Халық Банкі» АҚ ЕБ), бұрында - «HSBC Банк Қазақстан» АҚ ЕБ, Қазақстанның банк нарығында 1998 жылдан бері қызмет етіп келеді, корпоративтік және бөлшектік клиенттер үшін көптеген түрлі қызметтер мен өнімдер ұсынатын әмбебап коммерциялық банк болып табылады. «Altyn Bank» АҚ Алматы, Астана, Атырау және Ақтау қалаларында 4 филиалы және Алматыда 2 қосымша бөлімшесі бар.

«Қазақстан Халық Банкі» АҚ клиенттерінің ең үлкен қоры және таралу желісі бар жетекші қаржы тобы және жетекші бөлшектік банк болып табылады. Банк өзінің бөлшектік клиенттеріне, шағын және орта бизнес клиенттеріне және корпоративтік клиенттерге көптеген қызметтер түрлерін ұсына отырып, әмбебап қаржы тобы ретінде дамып келеді. Сонымен қатар, Банк өз операцияларын Ресей, Грузия және Қырғызстанда жүзеге асырады.

[www.altynbank.kz](http://www.altynbank.kz)



## Fitch affirms Altyn Bank's ratings

On 15 December 2017, Fitch Ratings has affirmed Altyn Bank's 'BB' Long-Term Issuer Default Rating (IDR) and maintained the ratings on Rating Watch Positive (RWP).

Altyn Bank's Long-Term IDRs at 'BB' reflect Fitch's opinion that Altyn Bank's parent institution, Halyk Bank of Kazakhstan, would likely have a high propensity to support its subsidiary in light of the bank's modest size and planned sale of a majority equity stake in Altyn Bank to China CITIC Bank Corporation Limited (CNCB).

Halyk Bank and CNCB signed a memorandum of understanding in November 2016. The sale is expected to close in 2018.

\*\*\*

**Altyn Bank JSC** (Subsidiary of Halyk Bank JSC), previously known as HSBC Bank Kazakhstan, established in Kazakhstan since 1998, has been acquired by and became a wholly owned subsidiary of Halyk Bank JSC in November 2014. With offices in four major cities in Kazakhstan and being a universal bank, Altyn Bank provides full range of products and services to corporate and retail clients across the country.

**Halyk Bank JSC** is the leading financial services group and the leading retail bank in Kazakhstan with the largest customer base and the broadest branch network. The Bank is developing as a universal financial services group rendering a wide range of services (banking services, insurance, leasing, and brokerage services) to its retail, SME and corporate clients. The Bank also operates in Russia, Georgia and Kyrgyzstan.

[www.altynbank.kz](http://www.altynbank.kz)



## Fitch Upgrades ATF Bank; Affirms Two Other Mid-Sized Kazakh Banks

Fitch Ratings-Moscow-15 December 2017: Fitch Ratings has upgraded the Long-Term Issuer Default Ratings (IDRs) of ATF Bank JSC to 'B' from 'B-' and affirmed the ratings of Bank Centercredit (BCC) at 'B'. The Outlooks on both banks' IDRs are Stable. The agency has affirmed Subsidiary Bank Sberbank of Russia, JSC (SBK) at 'BB+/Positive', and maintained the ratings of Altyn Bank JSC (Subsidiary Bank of Halyk Bank of Kazakhstan JSC) (AB) at 'BB'/Rating Watch Positive (RWP). A full list of rating actions is at the end of this commentary.

### KEY RATING DRIVERS - IDRS, NATIONAL LONG-TERM RATINGS (ALL BANKS)

The affirmation of SBK's 'BB+' Long-Term Foreign- and Local-Currency IDRs and '3' Support Rating reflects Fitch's view of the high propensity of its owner, Sberbank of Russia (SBR; BBB-/Positive), to provide support in case of need. This view is based on SBK's small size relative to its parent, the strategic importance of the CIS region for SBR, and possible reputational risks for the parent in case of a subsidiary default.

The Long-Term IDRs of ATF and BCC are in line with their Viability Ratings (VRs), and the upgrade of ATF's Long-Term IDR reflects the upgrade of its VR. The two banks now hold large buffers of junior debt (equal to an estimated 12.7% and 10.9% of risk-weighted assets, respectively), which may offer significant protection for the banks' senior creditors in case of failure. However, Fitch has not notched the banks' IDRs (which reflect the risk of default on senior obligations) up from their VRs (which capture failure risk) due to significant uncertainty about the extent of possible recapitalisation needs in a failure scenario, and whether junior debt would be sufficient to absorb these.

The higher National Rating of SBK compared to ATF and BCC reflects the benefits of shareholder support for its credit profile.

### KEY RATING DRIVERS - VRS (ALL BANKS)

The VRs, at 'b+' (SBK) and 'b' (ATF and BCC), primarily reflect the still significant size of potential asset quality problems at all three banks. However, on the positive side, the ratings reflect the banks' reasonable capital adequacy and liquidity profiles.

ATF and BCC's capitalisation has benefited significantly from sizeable capital injections in the form of subordinated debt from the National Bank of Kazakhstan (NBK) in 4Q17, as part of a programme to support the solvency of larger domestic banks. As the subordinated debt is quite long-term (15 years) and carries a low (4%) interest rate, the banks will book fair-value gains, and therefore positive adjustments to their equity, equal to more than half of the nominal value of the issues in both their IFRS and, Fitch understands, regulatory accounts.

The one-notch higher VR of SBK, compared to ATF and BCC, reflects its somewhat stronger capacity to absorb credit losses through the income statement and therefore gradually resolve its asset quality issues, and some ordinary benefits of support from its parent, SBR, in terms of potential problem asset sales. It also reflects the somewhat less deep-seated nature of SBK's asset quality problems, given that these have been generated relatively recently in contrast to the longstanding legacy exposures of ATF and BCC; however, the volume of problematic assets is similar across the three banks.

### KEY RATING DRIVERS - VR (SBK)

The affirmation of SBK's VR reflects Fitch's view of the limited changes in the bank's credit profile since the last review. The 'b+' VR continues to factor in the ordinary benefits of parental support, SBK's decent core profitability and comfortable liquidity, and some stabilisation, albeit at weak levels, of its asset quality and capitalisation metrics.

SBK's non-performing loans (NPLs, overdue by more than 90 days) stood at 11% of gross loans at end-3Q17, a ratio that has remained stable relative to end-2016, in part due to portfolio growth. In addition, restructured loans were a substantial 24%, albeit down from 31% at end-2016. Performing foreign-currency loans reduced to 11% from 15% of the portfolio; Fitch views such exposures as a potential source of problem recognition for all three banks given the large recent depreciation of the tenge.

Capitalisation remains weak in light of large unreserved problem loans, and SBK does not expect capital contributions from SBR in the near future. SBK's Fitch Core Capital (FCC) ratio of 11.4% at end-3Q17 was little changed in comparison with 11.6% at end-2016. The risks for capitalisation have slightly abated but remain considerable as NPLs less specific reserves fell to 0.3x FCC from 0.4x, and unreserved restructured loans reduced to 1.5x FCC from 1.9x FCC. Non-impaired foreign-currency loans contracted to 0.9x FCC from 1.1x FCC.

SBK's core profitability is relatively strong, helping the bank to provision or write off loans faster than peers. Annualised pre-impairment profit was equal to a high 7% of average gross loans for 9M17, the same level as in 2016. Operating profit has remained relatively low, at an annualised 8% of average equity in 9M17 after 6% in 2016, as SBK used most of its pre-impairment result to create provisions.

The funding profile remains under some pressure due to international sanctions on Russian state-controlled banks; this means SBK has to rely more on short-term non-retail funding and high-cost retail deposits. The bank maintains a solid liquidity buffer, equal to 35% of liabilities at end-3Q17.

#### KEY RATING DRIVERS - VR (ATF)

The upgrade of ATF Bank's VR to 'b' from 'b-' reflects the significant recent improvement in its solvency as a result of the NBK's capital support. High impaired loans, weak core profitability and high funding concentrations continue to weigh on ATF's ratings.

Of the KZT100 billion of low-rate, long-term subordinated debt provided by the NBK, Fitch expects about KZT60 billion to be booked as a fair-value gain, boosting equity, with the remaining KZT40 billion adding to Tier 2 capital. Adjusting end-3Q17 metrics for these contributions, ATF's FCC ratio would rise to 14% from 9%, and its Basel I Total capital ratio to 26% from 17%.

After reducing slightly in recent years, ATF's NPL ratio was still a high 19% at end-3Q17, with restructured loans an additional 12%. Foreign-currency loans reported as performing were a further 40%. ATF has agreed with the NBK to gradually create over five years KZT150 billion of additional impairment provisions (equal to 15% of loans at end-3Q17), primarily through utilisation of the new capital injection.

Following the capital increase, Fitch expects non-performing and restructured loans less specific reserves to have reduced to 0.6x and 0.4x FCC from 1.0x and 0.6x, respectively, at end-3Q17. Non-impaired foreign-currency loans less reserves should have fallen to 1.3x from 2.0x. Additional pressure comes from foreclosed property, equal to 0.5x post-support FCC.

Core profitability has been weak, but could improve somewhat as a result of business growth and earnings on NBK notes into which ATF placed the proceeds of the subordinated debt issue. Annualised pre-impairment profit adjusted for interest accrued but not received in cash was equal to a low 0.2% of average total assets in 9M17, but could add about 0.5pp as a result of the coupon income on the notes. Net income, at 15% of average equity in 9M17, could, in Fitch's view, turn into a moderate loss next year as a result of the higher planned impairment charges.

Liquid assets fell to a still reasonable 26% of liabilities at end-3Q17 from 46% at end-2016 as a result of a Eurobond repayment and some deposit outflows. Furthermore, high single-name concentrations, with the largest 20 depositors contributing 47% of the total, continue to constrain ATF's funding position and liquidity.

#### BCC

The affirmation of BCC's VR reflects the bank's still significant problem loans. However, the rating is supported at the 'b' level by the strengthening of BCC's core capital position following the contribution from the NBK, the bank's improved performance, and its reasonable funding and liquidity profile. The ownership linkages between BCC and Tsesnabank, the third-largest domestic lender, are neutral for BCC's rating given Fitch's view of the broadly similar credit profiles of the two banks.

At end-3Q17, BCC's NPLs were equal to 11% of gross loans and were fully covered by loan impairment reserves. However, additional asset quality risks stem from significant exposure to restructured loans (17% of gross loans or 1.2x FCC post-recap) and a related-party loan to a reportedly performing special-purpose vehicle, which holds BCC's problem assets (5% of gross loans or 0.4x FCC). Performing and non-restructured foreign-currency loans were a further 14% of gross loans (1x FCC). Fitch believes that BCC will have to absorb additional impairment losses from the above-mentioned loan exposures. BCC has agreed with the NBK to gradually create over five years KZT90 billion of additional impairment provisions (equal to around 10% of gross loans at end-3Q17), primarily through utilisation of the new capital injection.

Of the KZT60 billion subordinated debt provided by the NBK, Fitch expects about KZT35 billion to be recognised as a fair-value gain, boosting core capital. As a result, BCC's FCC ratio should increase to 12.5% from 9.3% at end-3Q17.

BCC's annualised pre-impairment profit, net of uncollected accrued interest, was equal to a reasonable 2.7% of average gross loans in 9M17, up from a low 0.8% in 2016 due to a stronger net interest margin. Headline profitability indicators also improved, with ROAE reaching 12% in 9M17, although Fitch expects internal capital generation capacity to soften from 2018, as most of the pre-impairment profit will likely be consumed by additional loan loss provisions.

The funding and liquidity profile remains a rating strength. BCC is predominantly customer funded (83% of end-3Q17 liabilities), and wholesale funding repayments for 4Q17-2018 are limited. At end-3Q17, BCC's liquid assets covered a high 31% of total liabilities.

#### AB - ALL RATINGS

AB's Long-Term IDRs at 'BB' reflect Fitch's opinion that AB's parent institution, Halyk Bank of Kazakhstan (HB; BB/Stable), would likely have a high propensity to support its subsidiary in light of AB's modest size and the planned sale of a majority equity stake in AB to China CITIC Bank Corporation Limited (CNCB; BBB/Stable).

HB and CNCB signed a memorandum of understanding in November 2016. The sale was originally expected to close this year but was later postponed to 2018.

Fitch has not assigned a VR to AB given that the bank's business model has been evolving after AB's acquisition by HB in 2014 and is likely to be the subject of potential further transformations after the expected ownership change.

#### DEBT RATINGS

Senior unsecured debt ratings are aligned with Long-Term IDRs based on average recovery expectations. Recoveries for senior creditors of defaulted Kazakh banks (typically in the 30%-50% range) have depended on the extent to which the authorities supported banks' restructurings with capital injections, and so were essentially the outcome of political decisions.

The dated subordinated debt issues of ATF and BCC are notched down once from the banks' VRs and National Long-Term Ratings, reflecting below-average recovery prospects. SBK's subordinated debt is notched down once from its Long-Term IDR and National Long-Term Rating, reflecting Fitch's view that support from SBR would likely be available to prevent non-performance on this.

The upgrade of the National Long-Term Rating on BCC's dated subordinated debt to 'BB(kaz)' from 'BB-(kaz)' is to bring the notching into line with that on the international scale.

The perpetual debt ratings of BCC and ATF are rated two notches lower than their VRs, reflecting greater non-performance risk and more limited recovery expectations. Kazakh banks' subordinated debt issues do not currently envisage any formal loss absorption triggers but, in Fitch's view, could absorb losses as "going-concern" instruments if in the regulator's view the bank had ceased to be viable.

SBK's debt ratings relate to debt issues made prior to 1 August 2014.

#### SUPPORT RATINGS (SRs) AND SUPPORT RATING FLOORS (SRFS)

The affirmations of the SRFs of ATF and BCC at 'No Floor' reflect their only moderate market shares of around 5% in sector assets and deposits and the fact that they have not been designated as systemically important institutions.

Notwithstanding the recent record of capital support for medium-sized banks, including ATF and BCC, in Fitch's view such support cannot be relied upon over the long term and in all circumstances, as the recent default of the ninth-largest bank in the country, Bank RBK (unrated), suggests.

#### RATING SENSITIVITIES

The Long-Term IDRs and VRs of ATF and BCC are primarily sensitive to material changes in these banks' asset quality and capitalisation. A material reduction in their exposure to problem assets, combined with maintenance of core capital ratios at current levels, could result in upgrades of the VRs. If asset quality problems abate while junior debt buffers remain substantial and are, in Fitch's view, sustainable, the banks' Long-Term IDRs could be notched up once from their VRs.

Conversely, a significant increase in problem asset exposures or recognition of greater-than-expected losses on these could result in downgrades of both VRs and Long-Term IDRs.

The Long-Term IDRs of SBK would likely change in tandem with the ratings of its parent, SBR. The Positive Outlook on SBK reflects that on SBR.

The RWP on AB's ratings reflects the potential for these to be upgraded as a result of the bank's expected acquisition by the higher-rated CNCB. The acquisition could take more than six months to complete.

Debt ratings would likely change in line with their respective anchor ratings, ie Long-Term IDRs for senior debt and SBK's subordinated debt, and VRs for ATF and BCC's subordinated and hybrid instruments.

ATF and BCC's 'CCC' hybrid ratings are unlikely to change as a result of the finalisation of Fitch's revised Global Bank Rating Criteria, an Exposure Draft for which was published on 13 December 2017. This is because these ratings are consistent with the proposed revised guidelines for notching of subordinated and hybrid instruments included in the Exposure Draft.

The rating actions are as follows:

#### ATF Bank JSC

Long-Term Foreign- and Local-Currency IDRs: upgraded to 'B' from 'B-'; Outlook Stable

Short-Term IDR: affirmed at 'B'

National Long-Term Rating: upgraded to 'BB+(kaz)' from 'BB-(kaz)'; Outlook Stable

Viability Rating: upgraded to 'b' from 'b-'

Support Rating: affirmed at '5'

Support Rating Floor: affirmed at 'No Floor'

Senior unsecured debt: upgraded to 'B'/BB+(kaz)' from 'B-'/BB-(kaz)'; Recovery Rating at 'RR4'

Dated subordinated debt: upgraded to 'B-'/BB(kaz)' from 'CCC'/B'; Recovery Rating at 'RR5'

Perpetual debt: upgraded to 'CCC' from 'CC'; Recovery Rating at 'RR6'

**Bank Centercredit**

Long-Term Foreign- and Local-Currency IDRs: affirmed at 'B'; Outlook Stable

Short-Term IDR: affirmed at 'B'

National Long-Term Rating: affirmed at 'BB+(kaz)'; Outlook Stable

Viability Rating: affirmed at 'b'

Support Rating: affirmed at '5'

Support Rating Floor: affirmed at 'No Floor'

Senior unsecured debt: affirmed at 'B'/BB+(kaz); Recovery Rating at 'RR4'

Dated subordinated debt: affirmed at 'B-'; Recovery Rating at 'RR5'

Dated subordinated debt National Rating: upgraded to 'BB(kaz)' from 'BB-(kaz)'

Perpetual debt rating: affirmed at 'CCC'; Recovery Rating at 'RR6'

**Subsidiary Bank Sberbank of Russia, JSC**

Long-Term Foreign- and Local-Currency IDRs: affirmed at 'BB+'; Outlook Positive

Short-Term IDR: affirmed at 'B'

National Long-Term Rating: affirmed at 'AA-(kaz)'; Outlook Positive

Viability Rating: affirmed at 'b+'

Support Rating: affirmed at '3'

Senior unsecured debt: affirmed at 'BB+'/'AA-(kaz)'

Subordinated debt: affirmed at 'BB+'/'A+(kaz)'

**Altyn Bank JSC (Subsidiary Bank of Halyk Bank of Kazakhstan JSC)**

Long-Term Foreign- and Local-Currency IDRs: 'BB'; maintained on RWP

Short-Term IDR: 'B'; maintained on RWP

National Long-Term Rating: 'A+(kaz)'; maintained on RWP

Support Rating: '3'; maintained on RWP

**Contact:**

**Primary Analysts**

Roman Kornev (SBK, ATF, BCC)

Director

+7 495 956 7016

Fitch Ratings CIS Ltd

26 Valovaya Street

Moscow 115054

Dmitri Vasiliev (AB)

Director

+7 495 956 5576

Fitch Ratings CIS Ltd

26 Valovaya Street

Moscow 115054

**Secondary Analysts**

Artem Beketov (ATF, SBK, AB)

Analyst

+7 495 956 9901

Dmitri Vasiliev (BCC)

Director

+7 495 956 5576

**Committee Chairperson**

Olga Ignatieva

Senior Director

+7 495 956 6906

Media Relations: Peter Fitzpatrick, London, Tel: +44 20 3530 1103, Email: [peter.fitzpatrick@fitchratings.com](mailto:peter.fitzpatrick@fitchratings.com).

Additional information is available on [www.fitchratings.com](http://www.fitchratings.com)

**Applicable Criteria**

Global Bank Rating Criteria (pub. 25 Nov 2016) (<https://www.fitchratings.com/site/re/891051>)

**Additional Disclosures**

Dodd-Frank Rating Information Disclosure Form (<https://www.fitchratings.com/site/dodd-frank-disclosure/1034075>)

Solicitation Status (<https://www.fitchratings.com/site/pr/1034075#solicitation>)

Endorsement Policy (<https://www.fitchratings.com/regulatory>)

ALL 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](https://www.fitchratings.com/understandingcreditratings)

(<https://www.fitchratings.com/understandingcreditratings>). IN ADDITION, RATING DEFINITIONS AND THE TERMS OF USE OF SUCH RATINGS ARE AVAILABLE ON THE AGENCY'S PUBLIC WEB SITE AT [WWW.FITCHRATINGS.COM](http://WWW.FITCHRATINGS.COM) (<https://www.fitchratings.com>). 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](https://www.fitchratings.com/site/regulatory) (<https://www.fitchratings.com/site/regulatory>). FITCH MAY HAVE PROVIDED ANOTHER PERMISSIBLE SERVICE TO THE RATED ENTITY OR ITS RELATED THIRD PARTIES. DETAILS OF THIS SERVICE FOR RATINGS FOR WHICH THE LEAD ANALYST IS BASED IN AN EU-REGISTERED ENTITY CAN BE FOUND ON THE ENTITY SUMMARY PAGE FOR THIS ISSUER ON THE FITCH WEBSITE. Copyright © 2017 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. 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 methodology, 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 sources with respect to the particular security or in the particular 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 its advisers are 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 forward-looking and embody assumptions and predictions about future events that by their nature cannot be verified as facts. As a result, despite any verification of current facts, ratings and forecasts can be affected by future events or conditions that were not anticipated at the time a rating or forecast was issued or affirmed.

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. Ratings do not comment on the adequacy of market price, the suitability of any security for a particular investor, or the tax-exempt nature or taxability of payments made in respect to 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\$750,000 (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 guarantor, for a single annual fee. Such fees are expected to vary from US\$10,000 to US\$1,500,000 (or the applicable currency equivalent). The assignment, publication, or dissemination of a rating by Fitch shall not constitute a consent by Fitch to use its name as an expert in connection with any registration statement filed under the United States securities laws, the Financial Services and Markets Act of 2000 of the United Kingdom, or the securities laws of any particular jurisdiction. Due to the relative efficiency of electronic publishing and distribution, Fitch research may be available to electronic subscribers up to three days earlier than to print subscribers.

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](https://www.fitchratings.com/site/regulatory) (<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 personnel may participate in determining credit ratings issued by or on behalf of the NRSRO.

**Solicitation Status**

Fitch Ratings was paid to determine each credit rating announced in this Rating Action Commentary (RAC) by the obligatory being rated or the issuer, underwriter, depositor, or sponsor of the security or money market instrument being rated, except for the following:

**Endorsement Policy** - Fitch's approach to ratings endorsement so that ratings produced outside the EU may be used by regulated entities within the EU for regulatory purposes, pursuant to the terms of the EU Regulation with respect to credit rating agencies, can be found on the EU Regulatory Disclosures (<https://www.fitchratings.com/regulatory>) page. The endorsement status of all International ratings is provided within the entity summary page for each rated entity and in the transaction detail pages for all structured finance transactions on the Fitch website. These disclosures are updated on a daily basis.