

Addiko Bank AG

Key Rating Drivers

Addiko Bank AG's ratings reflect the bank's business profile as a specialised lender focused on unsecured lending to retail clients and small businesses in south eastern Europe (SEE), where economies are more volatile. The ratings also reflect the group's adequate risk profile, improving asset quality and earnings. Capitalisation, liquidity and funding are rating strengths.

The Stable Outlook on Addiko's Long-Term Issuer Default Rating (IDR) reflects Fitch Ratings' view that labour market indicators in Addiko's largest markets should remain resilient in the next two years despite slower economic growth. However, high inflation is likely to lead to a moderate increase in impaired loans and loan impairment charges (LICs). The latter are likely to be offset by higher lending margins due to rising interest rates.

Focus on SEE: Addiko operates in SEE, including in countries with more volatile and less advanced economies as well as moderately developed banking sectors and capital markets. This is mitigated by limited geographic diversification across the region and a highly developed regulatory and legal framework in Austria, where the bank is headquartered and key corporate functions including liquidity management are centralised.

Niche Business Model: Our assessment of Addiko's business profile considers the group's small but growing franchise, which we believe has critical mass in all markets. It also reflects Addiko's positioning as a challenger, with clear unique selling points (speed and modern digital offering) affording the group some pricing power. The bank's business plan and strategy benefit from its knowledge of local markets and record in its key banking segments. Our assessment also reflects Addiko's small operations and a less diversified business model than larger peers.

Unsecured Lending: Addiko's risk profile is driven by its exposure to unsecured consumer and SME lending in SEE. We view the bank's underwriting criteria as in line with local industry practice. However, these have not yet been tested in a prolonged economic downturn.

Weak but Improving Profitability: The bank's profitability is weak but improving due to its successful restructuring, supported by a solid record of cost management, lower LICs and higher net interest margins, which we expect to continue in the next two years. Our assessment also reflects the bank's dependence on less diversified revenues from less stable operating environments and a potential, albeit limited, burden from additional provisions for legacy Swiss franc-denominated loans.

Solid Capitalisation: Addiko's capitalisation is a rating strength in light of its high risk-weight density, which translates into an above-average leverage ratio. Our assessment also reflects the bank's high and stable capital adequacy targets and improving pre-impairment profitability.

Stable Deposits Underpin Funding: The bank is mainly funded by retail deposits sourced locally, which is positive for our assessment of funding and liquidity, which is also supported by its healthy structural liquidity position. Addiko has no reliance on external wholesale funding. We view the bank's intention not to access the wholesale market in the medium term as credible given its liquidity buffer and established depositor base. Addiko's 'B' Short-Term IDR is the only option that maps to a 'BB' Long-Term IDR on Fitch's rating scale.

Ratings

Foreign Currency

| | |
|----------------|----|
| Long-Term IDR | BB |
| Short-Term IDR | B |

| | |
|---------------------------|----|
| Viability Rating | bb |
| Government Support Rating | ns |

Sovereign Risk (Austria)

| | |
|--------------------------------|-----|
| Long-Term Foreign-Currency IDR | AA+ |
| Long-Term Local-Currency IDR | AA+ |
| Country Ceiling | AAA |

Outlooks

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

Applicable Criteria

[Bank Rating Criteria \(September 2023\)](#)

Related Research

[Fitch Rates Addiko 'BB'; Outlook Stable \(August 2023\)](#)

Analysts

Marco Diamantini
+49 69 768076 114
marco.diamantini@fitchratings.com

Markus Glabach
+49 69 768076 195
markus.glabach@fitchratings.com

Rating Sensitivities

Factors that Could, Individually or Collectively, Lead to Negative Rating Action/Downgrade

We would downgrade the ratings following substantial capital erosion, which could be caused by a materialisation of legal risks, from aggressive dividend distribution or from asset-quality deterioration (including materially larger write-offs).

In addition, we could downgrade the ratings if strategic objectives shift, growth acceleration results in a negative deviation from current underwriting standards and investment policies, or due to failure to maintain operating profit at least at 1.25% of risk-weighted assets (RWAs).

Factors that Could, Individually or Collectively, Lead to Positive Rating Action/Upgrade

An upgrade would require a record of operating profit close to 2.5% of RWAs, indicating a sustained strengthening of Addiko's business profile, while maintaining an impaired loans ratio at or below about 5% and a common equity Tier 1 ratio of close to 20%.

An upgrade could also result from a material improvement in the operating environment, as a result of a shift in business expansion towards markets Fitch considers more stable, notably Croatia or Slovenia.

Ratings Navigator

| Addiko Bank AG | | | | | | | ESG Relevance: | Banks Ratings Navigator | | |
|-----------------------|------------------|--------------|-------------------|--------------------------|---------------------------|---------------------|--------------------------|-------------------------|--------------------|-----------------------|
| Operating Environment | Business Profile | Risk Profile | Financial Profile | | | | Implied Viability Rating | Viability Rating | Government Support | Issuer Default Rating |
| | | | Asset Quality | Earnings & Profitability | Capitalisation & Leverage | Funding & Liquidity | | | | |
| | 20% | 10% | 20% | 15% | 25% | 10% | aaa | aaa | aaa | AAA |
| | | | | | | | aa+ | aa+ | aa+ | AA+ |
| | | | | | | | aa | aa | aa | AA |
| | | | | | | | aa- | aa- | aa- | AA- |
| | | | | | | | a+ | a+ | a+ | A+ |
| | | | | | | | a | a | a | A |
| | | | | | | | a- | a- | a- | A- |
| | | | | | | | bbb+ | bbb+ | bbb+ | BBB+ |
| | | | | | | | bbb | bbb | bbb | BBB |
| | | | | | | | bbb- | bbb- | bbb- | BBB- |
| | | | | | | | bb+ | bb+ | bb+ | BB+ |
| | | | | | | | bb | bb | bb | BB Sta |
| | | | | | | | bb- | bb- | bb- | BB- |
| | | | | | | | b+ | b+ | b+ | B+ |
| | | | | | | | b | b | b | B |
| | | | | | | | b- | b- | b- | B- |
| | | | | | | | ccc+ | ccc+ | ccc+ | CCC+ |
| | | | | | | | ccc | ccc | ccc | CCC |
| | | | | | | | ccc- | ccc- | ccc- | CCC- |
| | | | | | | | cc | cc | cc | CC |
| | | | | | | | c | c | c | C |
| | | | | | | | 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.

VR - Adjustments to Key Rating Drivers

The operating environment score of 'bb+' has been assigned below the 'aa' category implied score, due to the following adjustment reason: international operations (negative).

The business profile score of 'bb' has been assigned above the 'b' category implied score, due to the following adjustment reason: strategy and execution (positive).

The asset quality score of 'bb-' has been assigned above the 'b and below' category implied score, due to the following adjustment reason: historical and future metrics (positive).

The earnings and profitability score of 'bb-' has been assigned above the 'b and below' category implied score, due to the following adjustment reason: historical and future metrics (positive).

The capitalisation and leverage score of 'bb' has been assigned below the 'bbb' category implied score, due to the following adjustment reason: risk profile and business model (negative).

Company Summary and Key Qualitative Factors

Operating Environment

Addiko's operating environment (OE) score is the average of the OE scores of its markets of operations, using loan exposures as weights. The OE score reflects the group's operations across SEE, including countries with more volatile and less advanced economies and modestly developed banking sectors and capital markets. This is mitigated by some geographic diversification in the region and a developed regulatory and legal framework in Austria, where the bank is headquartered, and key corporate functions, including liquidity management, are centralised.

Operating Environment by Markets of Operations

| OE Score | Markets | Loans (EURm, end-September 2023) | (%) |
|----------|------------------------|----------------------------------|-----|
| aa- | Austria | 0 | 0 |
| bbb | Slovenia | 1,034 | 29 |
| bbb- | Croatia | 1,153 | 32 |
| bb- | Serbia | 634 | 18 |
| b | Bosnia and Herzegovina | 628 | 17 |
| No score | Montenegro | 165 | 4 |

Source: Fitch Ratings, Addiko

Business Profile

Addiko was established in 2015 through the acquisition of the SEE business of the former Hypo Alpe Adria Bank by the European Bank of Reconstruction and Development and by Advent International, a US private equity investor. In 2019, Addiko was listed on the Vienna Stock Exchange. Around 57% of the bank's shares are in free float.

The group's parent bank, Addiko Bank AG, is a fully licenced bank in Austria regulated by the ECB and the Austrian Financial Market Authority (FMA). It has six subsidiaries, in Croatia, Slovenia, Bosnia and Herzegovina (where it operates through two banks), Serbia, and Montenegro. Unlike the larger Italian and Austrian banks with subsidiaries in SEE, which generate only a minor share of their business in the region, Addiko exclusively focuses on Balkan countries. This exposes the bank to risks arising from geographical concentration in a region where macroeconomic shocks can be highly correlated.

Addiko is a niche bank with market shares of between 3% and 10% in consumer and small business lending in most of the countries in which it operates, serving about 900,000 customers through digital banking and a network of 154 branches. We believe this is a sufficient mass to achieve scale in this business. A modern digital interface and above-average speed in time to cash affords the group some pricing power in consumer lending. Similarly, the bank is well positioned to serve small and micro businesses (up to EUR1.5 million turnover) with standardised products, while it has exited relationship-based lending to larger SMEs.

The bank invests in the development of its digital offering so as to expand its business. Over the past two years, Addiko has introduced various digital initiatives, including end-to-end digital lending for consumer clients, lending via partnerships (i.e. point-of-sale financing), buy-now-pay-later services via a fintech partner, and digital lending for micro-SMEs. Addiko's non-core business includes mortgage lending, and its public sector and large corporate lending portfolios that had been originated before 2016 are in run-down, providing liquidity and capital for the growth of its unsecured, higher-yielding consumer and small business lending.

Risk Profile

Addiko has reduced concentration risk over the past four years by winding down most of its non-core medium and large corporate loan books, a large portion of which were non-performing. Its risk profile is now driven by its exposure to unsecured consumer and SME lending in SEE.

Addiko also remains exposed to legal claims related to Swiss franc-denominated mortgages originated before 2009, but we view this as manageable for the bank – even in a worst-case outcome. The exposure to Swiss franc loans was reduced to EUR66 million at end-3Q23 (1.8% of gross loans) from EUR1.2 billion at end-2015. Over half of the loan exposure in 2015 was to Croatian borrowers and has already been impaired following the enactment of a conversion law. Croatian borrowers are potentially entitled to request additional default interest on overpaid amounts until the conversion date. In 9M23 Addiko booked EUR33 million provisions for expected legal matters, in particular due to Swiss franc-denominated loans in Croatia, which is covered by the bank's profits.

In 2022, Slovenia also passed a law to convert Swiss franc loans, which would have led to up to EUR110 million estimated damage (15% of common equity Tier 1 capital, 79% of the Swiss franc loan volume outstanding in 2015) according to Addiko, but the law was declared unconstitutional by the Slovenian constitutional court. We also do not expect Addiko's profitability to be significantly reduced by the new windfall tax on banking assets planned by the Slovenian government.

Loan underwriting criteria are standardised across the group, cash-flow based and automated. We view loan underwriting criteria as broadly in line with those of local peers. Addiko's investment book totalled EUR1.2 billion at end-3Q23 and mainly includes central European and SEE sovereign bonds with an average maturity of four years. Bonds added after 1Q22 (31% of the portfolio) are classified as held-to-collect with negligible unrealised losses, while older ones are at fair value with a EUR71 million negative reserve in equity, at end-1H23. Addiko's market risk is low and relates primarily to foreign-currency risk from Addiko's equity holding in its subsidiary in Serbia.

Financial Profile

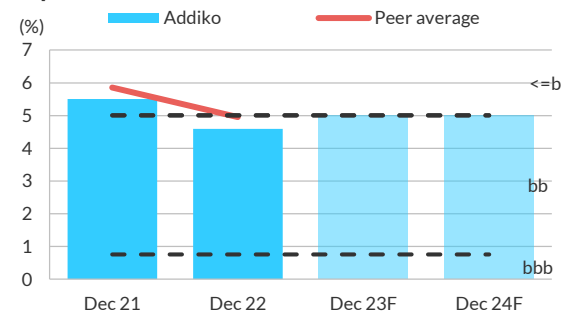
Asset Quality

Consumer and SME lending accounted for 48% and 38% of Addiko's loan book at end-3Q23, respectively. We expect LICs/gross loans to increase to 100bp-130bp in 2024, which is adequately covered by pre-impairment profit. LICs have remained below that level in the past five years due to loan loss allowance reversals in wind-down portfolios. The latter include mortgage (11% of loans), large corporates (3%) and public finance (1%) loans. Higher-than-expected unemployment, sharp increases in interest rates, or inflation in Addiko's markets would be likely to result in higher LICs.

We expect Addiko's impaired loans ratio to remain close to 5% over the next two years because the bank can sell impaired consumer loans in all its markets, except Serbia and Bosnia. Addiko reduced its volume of non-performing exposure to EUR153 million at end-3Q23 (2018: EUR404 million) following an active reduction of its legacy impaired loans through portfolio sales and work-outs.

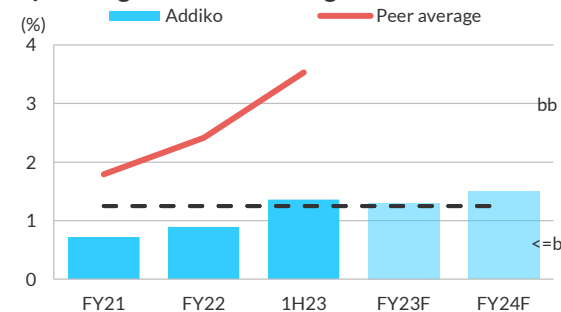
Coverage of Stage 3 loans with specific loan loss allowances was 79% at end-1H23, while the overall impairment coverage is solid at above 100%, inflated by Stage 2 loans provisions and management overlays to address uncertainties and volatility in the macroeconomic environment.

Impaired Loans/Gross Loans



Source: Fitch Ratings, Fitch Solutions, banks

Operating Profit/Risk-Weighted Assets



Source: Fitch Ratings, Fitch Solutions, banks

Earnings and Profitability

Addiko's profitability still lags behind that of peers that have comparable business profiles in SEE, even after adjusting for the bank's higher RWA density. We expect Addiko's profitability to improve and its operating profit/RWAs to increase towards 2% in the next three years (2022: 0.9%), driven by loan growth and higher-yielding new business, which should offset deposit repricing, cost inflation and the expected increase in LICs from the current low level.

Operating profits in 9M23 (1.4% of RWAs) were supported by increased net interest income (up 30% yoy), driven by higher loan volumes and deposits repricing at a much slower rate than for the bank's loan book and liquidity holdings. Addiko's reported net interest margin therefore increased to 3.7% in 9M23 (9M22: 3.0%). Fee and commission income slightly declined, mainly driven by the lost FX business from Croatia following the introduction of the euro in January 2023. Operating expenses increased 5.8% yoy, driven by wage and energy price inflation, preloading of audit costs and residual costs for the euro implementation project in Croatia.

The bank's business model, based on a high share of recurring lending business in the consumer/SME segment, reduces revenue volatility. Net interest income accounted on average for 75% of revenue over the past four years, while net commission income originates mostly from payments, account management and credit cards.

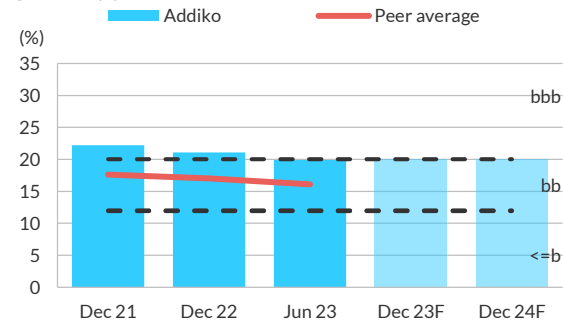
Capital and Leverage

Addiko has no additional Tier 1 or Tier 2 instruments outstanding, and its total capital (TC) ratio was equal to its common equity Tier 1 ratio (both 19.5% at end-3Q23, excluding an accrued interim profit of EUR30.1 million). The management is aiming for a TC ratio above 18.6% at end-2023. This provides some headroom over Addiko's TC requirement (14.7%) and its Pillar 2 guidance (1H23: 3.25%).

Addiko's use of the standardised approach for most of its RWAs limits the vulnerability of capital ratios to negative rating migration. Fitch believes that Addiko's standardised approach also understates the bank's capitalisation compared with peers with similar risk profiles that make extensive use of the internal rating-based approach. Addiko's Basel leverage ratio of 11% at end-1H23, which is much stronger than that of peers, illustrates this.

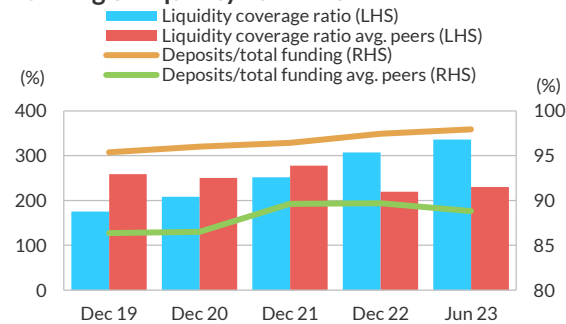
Organic capital generation is modest given the bank’s shareholder-friendly dividend policy, but sufficient to match business-driven RWA growth. Capital fungibility across the group is limited to annual profits, as special dividends are subject to lengthy approval processes involving local regulators.

CET1 Ratio



Source: Fitch Ratings, Fitch Solutions, banks

Funding & Liquidity vs. Peers



Source: Fitch Ratings, Fitch Solutions, banks

Funding and Liquidity

Addiko’s funding is dominated by a stable, granular deposit base, which accounted for 98% of its total funding at end-3Q23. In particular, Addiko benefits from its brand recognition in SEE, where it inherited household deposits from Hypo Alpe Adria, and collection of online deposits in Germany and Austria.

Addiko is not subject to a minimum requirement for own funds and eligible liabilities (MREL) at group level. MREL applies to its Croatian subsidiary and is covered with local own funds. In addition, the bank expects its Slovenian subsidiary to also become subject to MREL, in which case it would downstream eligible liabilities to cover the EUR5 million gap. We do not expect Addiko to issue debt instruments as long as it can finance its growth with deposits.

Liquidity is managed prudently and Addiko’s highly liquid assets were nearly 40% of total assets at end-3Q23. The bank has also repaid in full its central bank tenders (TLTRO) in 2022, and subsidiaries are mostly funded locally.

Additional Notes on Charts

The forecasts in the charts in this section reflect Fitch’s forward view on the bank’s core financial metrics under Fitch’s *Bank Rating Criteria*. They are based on a combination of Fitch’s macro-economic forecasts, outlook at the sector level and company-specific considerations. As a result, Fitch’s forecasts may materially differ from the guidance provided by the rated entity to the market.

To the extent Fitch is aware of material non-public information with respect to future events, such as planned recapitalisations or merger and acquisition activity, Fitch will not reflect these non-public future events in its published forecasts. However, where relevant, such information is considered by Fitch as part of the rating process.

Black dashed lines represent indicative quantitative ranges and implied scores for Fitch’s core financial metrics for banks operating in the environments that Fitch scores in the ‘bb’ category. Light-blue columns represent Fitch’s forecasts.

Peer average includes Banca Transilvania S.A. (VR: bb+), United Bulgarian Bank AD (bb), ProCredit Holding AG & Co. KGaA (bb), Nova Kreditna banka Maribor d.d. (bbb-), Erste & Steiermarkische Bank d.d. (bb+), Alior Bank S.A. (bb).

Financials

Financial Statements

| | 30 September 23 | | 31 Dec 22 | 31 Dec 21 | 31 Dec 20 |
|--|------------------------------|---------------------------------|-----------------------|-----------------------|-----------------------|
| | 9 months - interim (USDm) | 9 months - interim (EUR 000) | Year end (EUR 000) | Year end (EUR 000) | Year end (EUR 000) |
| Summary income statement | | | | | |
| Net interest and dividend income | 177 | 167,500 | 176,400 | 169,500 | 174,700 |
| Net fees and commissions | 53 | 50,300 | 72,500 | 66,800 | 59,800 |
| Other operating income | -8 | -7,800 | -7,400 | -4,900 | 2,500 |
| Total operating income | 222 | 210,000 | 241,500 | 231,400 | 237,000 |
| Operating costs | 174 | 164,500 | 194,900 | 192,000 | 177,700 |
| Pre-impairment operating profit | 48 | 45,500 | 46,600 | 39,400 | 59,300 |
| Loan and other impairment charges | 10 | 9,500 | 15,400 | 13,300 | 48,400 |
| Operating profit | 38 | 36,000 | 31,200 | 26,100 | 10,900 |
| Other non-operating items (net) | n.a. | n.a. | n.a. | -5,300 | -4,600 |
| Tax | 6 | 5,900 | 5,500 | 7,200 | 4,900 |
| Net income | 32 | 30,100 | 25,700 | 13,600 | 1,400 |
| Summary balance sheet | | | | | |
| Assets | | | | | |
| Gross loans | 3,690 | 3,483,200 | 3,476,200 | 3,489,100 | 3,851,400 |
| - Of which impaired | 163 | 153,500 | 159,600 | 192,200 | 237,300 |
| Loan loss allowances | n.a. | n.a. | 183,500 | 210,400 | 266,700 |
| Net loans | 3,690 | 3,483,200 | 3,292,700 | 3,278,700 | 3,584,700 |
| Interbank | 73 | 69,100 | 89,200 | 5,700 | 56,500 |
| Derivatives | n.a. | n.a. | 5,000 | 1,100 | 3,100 |
| Other securities and earning assets | 1,294 | 1,221,900 | 1,083,800 | 1,048,800 | 967,100 |
| Total earning assets | 5,058 | 4,774,200 | 4,470,700 | 4,334,300 | 4,611,400 |
| Cash and due from banks | 1,375 | 1,297,900 | 1,382,900 | 1,361,700 | 1,156,300 |
| Other assets | 128 | 120,800 | 142,800 | 146,300 | 146,800 |
| Total assets | 6,561 | 6,192,900 | 5,996,400 | 5,842,300 | 5,914,500 |
| Liabilities | | | | | |
| Customer deposits | 5,391 | 5,088,500 | 4,959,600 | 4,708,200 | 4,728,100 |
| Interbank and other short-term funding | 128 | 120,800 | 128,600 | 174,700 | 196,300 |
| Trading liabilities and derivatives | 5 | 5,000 | 3,100 | 2,300 | 4,900 |
| Total funding and derivatives | 5,524 | 5,214,300 | 5,091,300 | 4,885,200 | 4,929,300 |
| Other liabilities | 222 | 209,900 | 158,800 | 152,000 | 133,400 |
| Total equity | 814 | 768,700 | 746,300 | 805,100 | 851,800 |
| Total liabilities and equity | 6,561 | 6,192,900 | 5,996,400 | 5,842,300 | 5,914,500 |
| Exchange rate | | USD1 = EUR0.920302 | USD1 = EUR0.937559 | USD1 = EUR0.884173 | USD1 = EUR0.821963 |

Source: Fitch Ratings, Fitch Solutions, Addiko Bank AG

Key Ratios

| | 30 Sep 23 | 31 Dec 22 | 31 Dec 21 | 31 Dec 20 |
|--|-----------|-----------|-----------|-----------|
| Ratios (annualised as appropriate; %) | | | | |
| Profitability | | | | |
| Operating profit/risk-weighted assets | 1.3 | 0.9 | 0.7 | 0.3 |
| Net interest income/average earning assets | 4.9 | 4.0 | 3.7 | 3.6 |
| Non-interest expense/gross revenue | 78.3 | 80.7 | 83.0 | 75.0 |
| Net income/average equity | 5.3 | 3.3 | 1.6 | 0.2 |
| Asset quality | | | | |
| Impaired loans ratio | 4.4 | 4.6 | 5.5 | 6.2 |
| Growth in gross loans | 0.2 | -0.4 | -9.4 | -6.9 |
| Loan loss allowances/impaired loans | n.a. | 115.0 | 109.5 | 112.4 |
| Loan impairment charges/average gross loans | 0.4 | 0.4 | 0.5 | 1.2 |
| Capitalisation | | | | |
| Common equity Tier 1 ratio | 19.5 | 21.1 | 22.2 | 20.3 |
| Fully loaded common equity Tier 1 ratio | 19.5 | 20.9 | 21.6 | 19.3 |
| Tangible common equity/tangible assets | 11.6 | 11.9 | 13.2 | 13.9 |
| Basel leverage ratio | 11.0 | 11.6 | 12.9 | 13.1 |
| Net impaired loans/common equity Tier 1 | n.a. | -3.3 | -2.3 | -3.6 |
| Funding and liquidity | | | | |
| Gross loans/customer deposits | 68.5 | 70.1 | 74.1 | 81.5 |
| Liquidity coverage ratio | 331.1 | 307.4 | 252.1 | 208.5 |
| Customer deposits/total non-equity funding | 97.7 | 97.5 | 96.4 | 96.0 |
| Net stable funding ratio | n.a. | 170.5 | 162.6 | 149.3 |

Source: Fitch Ratings, Fitch Solutions, Addiko

Support Assessment

| Commercial Banks: Government Support | |
|---|---------------|
| Typical D-SIB GSR for sovereign's rating level (assuming high propensity) | a+ to a- |
| Actual jurisdiction D-SIB GSR | |
| Government Support Rating | ns |
| Government ability to support D-SIBs | |
| Sovereign Rating | AA+/ Negative |
| Size of banking system | Neutral |
| Structure of banking system | Neutral |
| Sovereign financial flexibility (for rating level) | Neutral |
| Government propensity to support D-SIBs | |
| Resolution legislation | Negative |
| Support stance | Neutral |
| Government propensity to support bank | |
| Systemic importance | Negative |
| Liability structure | Neutral |
| Ownership | Neutral |

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

■ Higher influence ■ Moderate influence ■ Lower influence

The Government Support Rating of 'no support' reflects our view that the EU's Bank Recovery and Resolution Directive and the Single Resolution Mechanism provide a resolution framework that is likely to require senior creditors participating in losses instead of a bank receiving sovereign support. In addition, we do not factor in any support from Addiko's owners because we generally view that support from financial investors, while possible, cannot be relied on.

Environmental, Social and Governance Considerations

FitchRatings Addiko Bank AG

Banks
Ratings Navigator

Credit-Relevant ESG Derivation

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

Environmental (E) Relevance Scores

| General Issues | E Score | Sector-Specific Issues | Reference | E Relevance |
|--|---------|--|---|-------------|
| GHG Emissions & Air Quality | 1 | n.a. | n.a. | 5 |
| Energy Management | 1 | n.a. | n.a. | 4 |
| Water & Wastewater Management | 1 | n.a. | n.a. | 3 |
| Waste & Hazardous Materials Management; Ecological Impacts | 1 | n.a. | n.a. | 2 |
| 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 |

How to Read This Page
ESG relevance scores range from 1 to 5 based on a 15-level color gradation. Red (5) is most relevant to the credit rating and green (1) is least relevant.

The Environmental (E), Social (S) and Governance (G) tables break out the ESG general issues and the sector-specific issues that are most relevant to each industry group. Relevance scores are assigned to each sector-specific issue, signaling the credit-relevance of the sector-specific issues to the issuer's overall credit rating. The Criteria Reference column highlights the factor(s) within which the corresponding ESG issues are captured in Fitch's credit analysis. The vertical color bars are visualizations of the frequency of occurrence of the highest constituent relevance scores. They do not represent an aggregate of the relevance scores or aggregate ESG credit relevance.

The Credit-Relevant ESG Derivation table's far right column is a visualization of the frequency of occurrence of the highest ESG relevance scores across the combined E, S and G categories. The three columns to the left of ESG Relevance to Credit Rating summarize rating relevance and impact to credit from ESG issues. The box on the far left identifies any ESG Relevance Sub-factor issues that are drivers or potential drivers of the issuer's credit rating (corresponding with scores of 3, 4 or 5) and provides a brief explanation for the relevance score. All scores of '4' and '5' are assumed to result in a negative impact unless indicated with a '+' sign for positive impact. Scores of 3, 4 or 5) and provides a brief explanation for the score.

Social (S) Relevance Scores

| General Issues | S Score | Sector-Specific Issues | Reference | S Relevance |
|--|---------|--|---|-------------|
| 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 |
| 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 |

Classification of ESG issues has been developed from Fitch's sector ratings criteria. The General Issues and Sector-Specific Issues draw on the classification standards published by the United Nations Principles for Responsible Investing (PRI), the Sustainability Accounting Standards Board (SASB), and the World Bank.

Governance (G) Relevance Scores

| General Issues | G Score | Sector-Specific Issues | Reference | G Relevance | CREDIT-RELEVANT ESG SCALE How relevant are E, S and G issues to the overall credit rating? |
|------------------------|---------|--|---|-------------|---|
| Management Strategy | 3 | Operational implementation of strategy | Business Profile (incl. Management & governance) | 5 | 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. |
| Governance Structure | 3 | Board independence and effectiveness; ownership concentration; protection of creditor/stakeholder rights; legal/compliance risks; business continuity; key person risk; related party transactions | Business Profile (incl. Management & governance); Earnings & Profitability; Capitalisation & Leverage | 4 | 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. |
| Group Structure | 3 | Organizational structure; appropriateness relative to business model; opacity; intra-group dynamics; ownership | Business Profile (incl. Management & governance) | 3 | 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. |
| Financial Transparency | 3 | Quality and frequency of financial reporting and auditing processes | Business Profile (incl. Management & governance) | 2 | Irrelevant to the entity rating but relevant to the sector. |
| | | | | 1 | Irrelevant to the entity rating and irrelevant to the sector. |

The highest level of ESG credit relevance is a score of '3', unless otherwise disclosed in this section. A score of '3' means 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. Fitch's ESG Relevance Scores are not inputs in the rating process; they are an observation on the relevance and materiality of ESG factors in the rating decision. For more information on Fitch's ESG Relevance Scores, visit <https://www.fitchratings.com/topics/esg/products#esg-relevance-scores>.

SOLICITATION & PARTICIPATION STATUS

For information on the solicitation status of the ratings included within this report, please refer to the solicitation status shown in the relevant entity's summary page of the Fitch Ratings website.

For information on the participation status in the rating process of an issuer listed in this report, please refer to the most recent rating action commentary for the relevant issuer, available on the Fitch Ratings website.

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 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>), 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.

Copyright © 2023 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.