# MOODY'S

#### **CREDIT OPINION**

4 April 2024

# Update



#### **RATINGS**

#### Barcelona, City of

Domicile	Spain
Long Term Rating	Baa1
Туре	LT Issuer Rating - Fgn Curr
Outlook	Positive

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

#### Contacts

Marisol Blazquez +34.91.768.8213 AVP-Analyst

marisol.blazquez@moodys.com

Federico Impaglione +34.91.768.8234
Ratings Associate

federico.impaglione@moodys.com

Sebastien Hay +34.91.768.8222
Associate Managing Director
sebastien.hay@moodys.com

#### CLIENT SERVICES

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

# City of Barcelona (Spain)

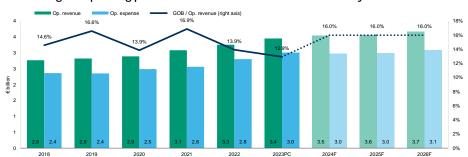
Update following rating affirmation; outlook changed to positive

#### **Summary**

The credit quality of the <u>City of Barcelona</u> (Baa1 positive) reflects the city's robust budgetary management and solid financial fundamentals in recent years, which have ensured high self-financing capacity and low need for debt financing. Because of its self-imposed financial rules, Barcelona generated high levels of operating surpluses during the last five years (15% on average) and limited its debt to less than 60% of operating revenue (around 39% as of year-end 2023).

Exhibit 1

Barcelona's good operating performance will continue for the next three years



PC = Pre-Closing; F = Forecast based on Moody's Ratings estimations. Sources: Issuer and Moody's Ratings

# **Credit strengths**

- » Robust governance and financial management
- » Strong operating performance, which will continue
- » Low debt and a very good liquidity profile
- » Large and diversified economy

# Credit challenges

» Limited fiscal flexibility

## Rating outlook

The rating outlook is positive, reflecting Spain's more balanced economic growth prospects. This could result in higher tax revenue and increased transfers from the central government than initially expected. This would aid the city's financial stability, allowing it to maintain sound financials in the coming years, characterized by strong GOBs, financial surpluses, and low debt levels.

# Factors that could lead to an upgrade

The strengthening of Spain's credit profile, as reflected by an upgrade of the sovereign rating, could have positive credit implications for the Spanish sub-sovereigns in general in the form of further reductions in systemic risk. Because Barcelona's rating is at par with that of Spain, an upgrade of its rating would require an upgrade of the sovereign rating.

# Factors that could lead to a downgrade

Any downgrade of Spain's rating would likely have similar implications for Barcelona's rating. A substantial deterioration in Barcelona's budgetary ratios, reflected in financing deficits and rising debt, could also strain the city's rating.

## **Key indicators**

Exhibit 2

City of Barcelona

	2018	2019	2020	2021	2022	2023PC	2024F	2025F	2026F
Gross Operating Balance as a % of Operating Revenue	14.6	16.6	13.9	16.9	13.9	12.9	16.0	16.0	16.0
Capital Expenses as a % of Total Expenses	16.1	16.0	12.1	17.4	18.1	18.4	23.4	_	_
Self Financing Ratio	1.1	1.2	1.3	1.1	0.9	1.0	0.7	_	_
Financing Surplus(Deficit) as % of Total Revenue	1.5	3.2	3.6	1.2	-1.4	-0.7	0.0	0.0	0.0
Interest Expenses as a % of Operating Revenue	0.5	0.7	0.5	0.4	0.5	0.8	1.3	1.2	1.2
Gross Borrowing Need as a % of Total Revenue	0.3	0.0	0.0	1.8	4.5	2.3	10.2	_	_
Net Direct and Indirect debt as a % of Operating Revenue	30.3	27.7	27.8	26.6	34.3	38.6	42.2	41.2	40.0

PC = Pre-Closing; F = Forecast based on Moody's Ratings estimations. Sources: Issuer and Moody's Ratings

#### **Detailed credit considerations**

The credit profile of the City of Barcelona, as expressed in its Baa1 rating with a positive outlook, combines its Baseline Credit Assessment (BCA) of baa1 and a strong likelihood of extraordinary support from the central government if the city faces acute liquidity stress.

On 21 March 2024, we changed the outlook on Barcelona's rating to positive from stable and affirmed the rating at Baa1. The revision of the outlook to positive followed the change in the outlook on the Government of Spain's rating to positive from stable and affirmation of its rating at Baa1 on 15 March 2024. Should the country's medium-term economic growth prospects be higher and less volatile than what we currently assume — reflecting the opportunity underpinning the change in Spain's outlook from stable to positive — the increase in tax revenue could be more significant. This could, in turn, lead to an increase in state transfers to the city of Barcelona beyond our baseline forecast.

#### **Baseline Credit Assessment**

#### Robust governance and financial management

Barcelona's strong governance and management are reflected in its prudent budgetary practices. The quality of the city's internal controls and financial planning is very high. Barcelona also follows a prudent approach to debt and investment management, which limits its exposure to market risk. Comprehensive financial reporting supports fiscal and debt management.

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

#### Strong operating performance, which will continue

The City of Barcelona's financial performance has always been strong. According to 2023 preliminary results (on a consolidated basis), the city's gross operating balance (GOB) was €446 million, equivalent to 13% of its operating revenue, similar to the €454 million, or 14% of operating revenue, registered in 2022. This result mainly reflects a 7% increase in operating expenditure, while operating revenue increased by 6%. The rise in revenue was driven by a 5% increase in transfers received from the central government, and by an increase of around 6% in tax revenue.

On the other hand, the increase in operating expenditure in 2023 was mainly because of a 13.6% increase in transfers to the city's public sector, together with a 7.6% year-on-year increase in personnel and wages costs. Expenditure on goods and services also increased by around 2%, as the value of the renewed contracts with concessionaires to provide public services increased with rise in inflation and energy costs.

The city's positive GOB, together with its capital revenue, was insufficient to compensate for the capital spending of €676 million, resulting in a financing deficit of €26 million, which was equivalent to -0.7% of its operating revenue (deficit of €47 million, or -1.4% of operating revenue recorded in 2022). We expect the city's financing results to improve in the next two to three years.

To ease the strain on the regional and local economies, the Spanish government suspended fiscal rules for the whole of the public sector for 2020-23. However, Barcelona continues to follow its "Plan de Actuación Municipal". The plan aims to generate operating surpluses of more than 15% of operating revenue, limit debt to less than 60% of operating revenue and ensure payments to suppliers within 30 days (19.3 days on average in 2023).

#### Low debt and a very good liquidity profile

Barcelona has low debt, compared with that of its European peers. In 2023, the city's direct debt increased by around 20% to €1,013 million from €847 million in 2022, with net direct and indirect debt/operating revenue also increasing to around 39% as of year-end 2023 from 34% as of year-end 2022. However, the city's debt burden remains well below its self-imposed limit of 60%.

The city's indirect debt is low, compared with that of other Spanish municipalities, at around 10% of operating revenue in 2023. Indirect debt in 2023 comprised €335 million of debt incurred by public companies (€287 million in 2022) with no guaranteed debt. This indirect debt mainly comprised debt of €318 million from the Instituto Municipal de la Vivienda y Rehabillitación de Barcelona (IMHAB) as of year-end 2023; the IMHAB is the city's public company in charge of the construction of public housing in the city as part of a new housing plan to build around 2,500 houses by 2024, of which around 2,000 will be for social renting. Since 2022, the IMHAB has been reclassified by the IGAE, the state's audit agency, as a non-self-supporting company, which increased the city's ratio of net direct and indirect debt on that same year.

We expect further tax revenue collection for the next two to three years, which will help keep Barcelona's debt burden stable at around 40% until 2026, although it will still be lower than its self-imposed limit of 60%.

 NDID / Op. revenue (right axis) Net direct and indirect debt 16 45% 40% 1.4 42% 41% 40% 35% 1.2 30% 1.0 30% 25% 28% 28% 0.8 20% 0.6 15% 0.4 10% 0.2 5% 1.5 1.5 1.5 0.0 2021 2022 2023PC 2024F 2026F 2018 2019 2020 2025F

Exhibit 3
Barcelona's debt burden will remain low in the next two to three years

PC = Pre-Closing; F = Forecast based on Moody's Ratings estimations. Sources: Issuer and Moody's Ratings

Despite tight market conditions, the city's limited debt repayments have helped maintain its debt service/operating revenue very low, at around 2.5% in 2023 (3.7% in 2022).

The city's liquidity is very good, with abundant cash on hand of €838 million as of year-end 2023, equivalent to around 24% of its operating revenue, compared with €714 million a year earlier (22% of operating revenue). This cash on hand will be more than sufficient to cover debt repayments of around €65 million due in 2024. Furthermore, the city's high level of cash will be sufficient to cover around 83% of Barcelona's outstanding direct debt and is a strong mitigating factor for any unexpected treasury need, which is credit positive.

#### Large and diversified economy

Barcelona is the capital of the northeastern Spanish region of Catalunya and is one of the country's most developed and wealthiest cities; it is a decentralising counterweight to the capital city of Madrid. For the past few years, Barcelona's population has grown largely because of migration inflow; its 1.6 million inhabitants accounted for around 3.5% of the national population and nearly 21% of the Catalan population in 2022 (latest official data). It also concentrates a high portion of foreign population, with 22% people living in the city are foreigners.

Barcelona's economy is mainly concentrated in the services sector, primarily focused on business, healthcare, education, commerce, the hotel industry and tourism, with the tourism sector representing around 12% of the local GDP. While the city's economy was strongly affected by the pandemic in 2020 in terms of tourism, there has been a quick recovery since 2021 mainly because of the resumption of domestic and international travels. The number of passengers at Barcelona's airport is close to the pre-pandemic levels, at close to 50 million in 2023, only 5% below the level recorded just before the pandemic in 2019.

The city's GDP growth was 6.6% in 2022 (5.5% for Spain), mainly concentrated in the commercial, hotel and construction sectors. According to the city's forecast, its GDP growth will be around 1.7% and 2.2% in 2023 and 2024, respectively.

With the economic recovery, the city's unemployment rate decreased to 8.2% in Q1 2023 from 12.6% at the peak of the pandemic in 2020. At the same time, labour market activity in the city — mainly in the tourism and technology sectors — recovered to 81.7%, higher than the 75% for Spain and 78% for the region of Catalunya in Q1 2023.

#### Limited fiscal flexibility

The City of Barcelona mainly depends on transfers from the central government for its revenue. It has the authority to raise a variety of taxes, but has limited flexibility in setting their rates because the central government determines the maximum and minimum rates. However, the city would be able to collect additional revenue of close to €580 million if it were to use the maximum rate for the property tax, which is the main tax for Spanish municipalities, representing around 23% of Barcelona's operating revenue and

around 62% of the city's tax revenue. In addition, the city's tax collection will increase by around €104 million with the elimination of its current fiscal benefits/subsidies.

With respect to spending, Barcelona faces significant payroll costs, similar to other Spanish local governments. Although the Spanish local governments control staff numbers, pay increases largely reflect the decisions taken at the central government level, leaving municipalities with limited flexibility.

#### **Extraordinary support considerations**

Barcelona has a strong likelihood of receiving extraordinary support from the central government, reflecting our assessment of risk to the government's reputation if the city defaults. The central government promotes greater accountability for Spanish municipalities. Barcelona's strategic role in Spain provides the government with an incentive to support the city in the event of need.

#### **ESG** considerations

Barcelona, City of's ESG credit impact score is CIS-2

Exhibit 4
ESG credit impact score



Source: Moody's Ratings

Barcelona's ESG considerations do not have a material impact on the current rating (CIS-2).

Exhibit 5
ESG issuer profile scores



Source: Moody's Ratings

#### **Environmental**

Barcelona is highly exposed to environmental risks (**E-4**), mainly concentrated on heat stress, water stress, sea level rise and droughts. While there are some mitigants related to E risks they have limited effect on these risks. As a mitigating factor, the EU Next Generation funds will provide a significant portion of the city's resources for climate change reforms, including investments. Furthermore, the city's environmental responsibilities are limited, as the region of the Generalitat de Catalunya and the Government of Spain manage environmental policies within its territory.

#### **Social**

Barcelona's exposure to social issues are not material in differentiating credit quality (**S-2**), reflecting high quality health & safety standards and access to basic services. The only category that entails moderate exposure is the housing where the city of Barcelona faces issues mainly related to housing affordability.

#### Governance

Barcelona's governance profile is captured by a positive G issuer profile score (**G-1**). The city scores well on accountability, regulatory quality and government effectiveness. Barcelona has very robust governance and management, demonstrated by its self-imposed fiscal and financial rules, which are more restrictive than rules under current legislation for local governments in Spain. The city also provides transparent and timely financial reports.

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

# Rating methodology and scorecard factors

The assigned BCA of baa1 is close to the scorecard suggested BCA of baa2. The scorecard-generated BCA of baa2 reflects an Idiosyncratic Risk score of 2 (presented below) on a scale of 1 to 9, where 1 represents the strongest relative credit quality and 9 the weakest; and a Systemic Risk score of Baa1, as reflected in Spain's Baa1 positive sovereign bond rating.

For details on our rating approach, please refer to Regional and Local Governments rating methodology.

Exhibit 6
Barcelona, City of
Regional & Local Governments

Baseline Credit Assessment – Scorecard	Score	Value	Sub-factor Weighting	Sub-factor Total	Factor Weighting	Total
Factor 1: Economic Fundamentals				1	20%	0.20
Economic Strength [1]	1	179%	70%			
Economic Volatility	1		30%			
Factor 2: Institutional Framework				3	20%	0.60
Legislative Background	1		50%	,		
Financial Flexibility	5		50%	,		
Factor 3: Financial Position				1.50	30%	0.45
Operating Margin [2]	1	13.79%	12.5%			
Interest Burden [3]	1	0.65%	12.5%			
Liquidity	1		25%			
Debt Burden [4]	3	38.61%	25%			
Debt Structure [5]	1	5.70%	25%	,		
Factor 4: Governance and Management				1	30%	0.30
Risk Controls and Financial Management	1					
Investment and Debt Management	1					
Transparency and Disclosure	1					
Idiosyncratic Risk Assessment						1.55 (2)
Systemic Risk Assessment						Baa1
Suggested BCA Score						baa2
Assigned BCA						baa1

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

Source: Moody's Ratings; Fiscal 2023.

# Ratings

Exhibit 7

Category	Moody's Rating
BARCELONA, CITY OF	
Outlook	Positive
Baseline Credit Assessment	baa1
Issuer Rating	Baa1
Source: Moody's Ratings	

© 2024 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved. CREDIT RATINGS ISSUED BY MOODY'S CREDIT RATINGS AFFILIATES ARE THEIR CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND MATERIALS, PRODUCTS, SERVICES AND INFORMATION PUBLISHED OR OTHERWISE MADE AVAILABLE BY MOODY'S (COLLECTIVELY, "MATERIALS") MAY INCLUDE SUCH CURRENT OPINIONS. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT OR IMPAIRMENT. SEE APPLICABLE MOODY'S RATING SYMBOLS AND DEFINITIONS PUBLICATION FOR INFORMATION ON THE TYPES OF CONTRACTUAL FINANCIAL OBLIGATIONS ADDRESSED BY MOODY'S CREDIT RATINGS. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS, NON-CREDIT ASSESSMENTS ("ASSESSMENTS"), AND OTHER OPINIONS INCLUDED IN MOODY'S MATERIALS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S MATERIALS MAY ALSO INCLUDE QUANTITATIVE MODEL-BASED ESTIMATES OF CREDIT RISK AND RELATED OPINIONS OR COMMENTARY PUBLISHED BY MOODY'S ANALYTICS, INC. AND/OR ITS AFFILIATES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND MATERIALS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND MATERIALS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND MATERIALS DO NOT COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS, ASSESSMENTS AND OTHER OPINIONS AND PUBLISHES OR OTHERWISE MAKES AVAILABLE ITS MATERIALS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS, AND MATERIALS ARE NOT INTENDED FOR USE BY RETAIL INVESTORS AND IT WOULD BE RECKLESS AND INAPPROPRIATE FOR RETAIL INVESTORS TO USE MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS OR MATERIALS WHEN MAKING AN INVESTMENT DECISION. IF IN DOUBT YOU SHOULD CONTACT YOUR FINANCIAL OR OTHER PROFESSIONAL ADVISER.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT. FOR CLARITY, NO INFORMATION CONTAINED HEREIN MAY BE USED TO DEVELOP, IMPROVE, TRAIN OR RETRAIN ANY SOFTWARE PROGRAM OR DATABASE, INCLUDING, BUT NOT LIMITED TO, FOR ANY ARTIFICIAL INTELLIGENCE, MACHINE LEARNING OR NATURAL LANGUAGE PROCESSING SOFTWARE, ALGORITHM, METHODOLOGY AND/OR MODE!

MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND MATERIALS ARE NOT INTENDED FOR USE BY ANY PERSON AS A BENCHMARK AS THAT TERM IS DEFINED FOR REGULATORY PURPOSES AND MUST NOT BE USED IN ANY WAY THAT COULD RESULT IN THEM BEING CONSIDERED A BENCHMARK.

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the credit rating process or in preparing its Materials. To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability to any person or entity for any indirect, special, consequential, or incidental losses or damages whatsoever arising from or in connection with the information contained herein or the use of or inability to use any such information, even if MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers is advised in advance of the possibility of such losses or damages, including but not limited to: (a) any loss of present or prospective profits or (b) any loss or damage arising where the relevant financial instrument is not the subject of a particular credit rating assigned by MOODY'S.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability for any direct or compensatory losses or damages caused to any person or entity, including but not limited to by any negligence (but excluding fraud, willful misconduct or any other type of liability that, for the avoidance of doubt, by law cannot be excluded) on the part of, or any contingency within or beyond the control of, MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers, arising from or in connection with the information contained herein or the use of or inability to use any such information.

NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY CREDIT RATING, ASSESSMENT, OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

Moody's Investors Service, Inc., a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by Moody's Investors Service, Inc. have, prior to assignment of any credit rating, agreed to pay to Moody's Investors Service, Inc. for credit ratings opinions and services rendered by it. MCO and Moody's Investors Service also maintain policies and procedures to address the independence of Moody's Investors Service credit ratings and credit rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold credit ratings from Moody's Investors Service, Inc. and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at <a href="https://www.moodys.com">www.moodys.com</a> under the heading "Investor Relations — Corporate Governance — Charter Documents - Director and Shareholder Affiliation Policy."

Moody's SF Japan K.K., Moody's Local AR Agente de Calificación de Riesgo S.A., Moody's Local BR Agência de Classificação de Risco LTDA, Moody's Local MX S.A. de C.V, I.C.V., Moody's Local PE Clasificadora de Riesgo S.A., and Moody's Local PA Calificadora de Riesgo S.A. (collectively, the "Moody's Non-NRSRO CRAs") are all indirectly wholly-owned credit rating agency subsidiaries of MCO. None of the Moody's Non-NRSRO CRAs is a Nationally Recognized Statistical Rating Organization.

Additional terms for Australia only: Any publication into Australia of this document is pursuant to the Australian Financial Services License of MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657AFSL 336969 and/or Moody's Analytics Australia Pty Ltd ABN 94 105 136 972 AFSL 383569 (as applicable). This document is intended to be provided only to "wholesale clients" within the meaning of section 761G of the Corporations Act 2001. By continuing to access this document from within Australia, you represent to MOODY'S that you are, or are accessing the document as a representative of, a "wholesale client" and that neither you nor the entity you represent will directly or indirectly disseminate this document or its contents to "retail clients" within the meaning of section 761G of the Corporations Act 2001. MOODY'S credit rating is an opinion as to the creditworthiness of a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail investors.

Additional terms for India only: Moody's credit ratings, Assessments, other opinions and Materials are not intended to be and shall not be relied upon or used by any users located in India in relation to securities listed or proposed to be listed on Indian stock exchanges.

Additional terms with respect to Second Party Opinions (as defined in Moody's Investors Service Rating Symbols and Definitions): Please note that a Second Party Opinion ("SPO") is not a "credit rating". The issuance of SPOs is not a regulated activity in many jurisdictions, including Singapore. JAPAN: In Japan, development and provision of SPOs fall under the category of "Ancillary Businesses", not "Credit Rating Businesses", and are not subject to the regulations applicable to "Credit Rating Businesses" under the Financial Instruments and Exchange Act of Japan and its relevant regulation. PRC: Any SPO: (1) does not constitute a PRC Green Bond Assessment as defined under any relevant PRC laws or regulations; (2) cannot be included in any registration statement, offering circular, prospectus or any other documents submitted to the PRC regulatory authorities or otherwise used to satisfy any PRC regulatory disclosure requirement; and (3) cannot be used within the PRC for any regulatory purpose or for any other purpose which is not permitted under relevant PRC laws or regulations. For the purposes of this disclaimer, "PRC" refers to the mainland of the People's Republic of China, excluding Hong Kong, Macau and Taiwan.

REPORT NUMBER

1399769

