

### CREDIT OPINION

2 October 2025

#### Update



Send Your Feedback

#### RATINGS

##### Barcelona, City of

Domicile	Spain
Long Term Rating	A3
Type	LT Issuer Rating - Fgn Curr
Outlook	Stable

Please see the [ratings section](#) 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@moody's.com

Ignacio Falco +33.1.5330.1025  
Sr Ratings Associate  
ignacio.falco@moody's.com

Massimo Visconti, +39.02.9148.1124  
MBA  
Associate Managing Director  
massimo.visconti@moody's.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)

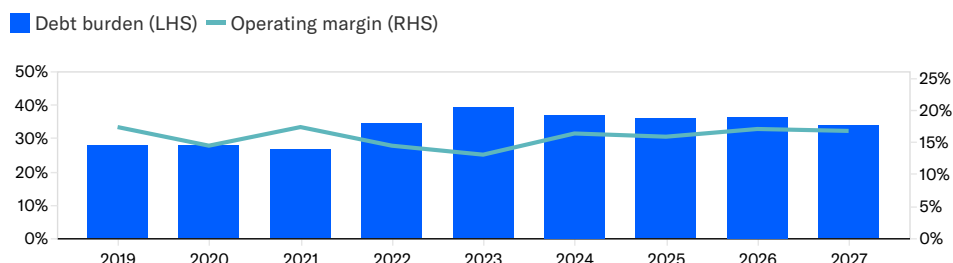
Update following rating upgrade

### Summary

The credit quality of the [City of Barcelona](#) (A3 stable) reflects the city's robust budgetary management and solid financial fundamentals, supported by a large and diversified economy. These strengths have ensured high self-financing capacity and limited reliance on debt. Due to its self-imposed financial rules, we expect Barcelona to maintain its track record of high operating surpluses — averaging 15% of operating revenue between 2019 and 2024 — and to maintain a low debt burden, projected to be around 34% by year-end 2027. These strengths are balanced by the city's limited fiscal flexibility, a common trait among Spanish local governments.

Exhibit 1

Barcelona's low debt burden and strong operating performance will continue through 2025-27



Note: Debt burden refers to net direct and indirect debt as a percentage of operating revenue. Operating margin refers to the primary operating balance as a percentage of operating revenue.

Sources: City of Barcelona and Moody's Ratings

### Credit strengths

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

### Credit challenges

- » Limited fiscal flexibility

## Rating outlook

The stable outlook for Barcelona reflects its capacity to continue strengthening its fiscal positions, posting stronger primary operating balances, better financial results, and lower debt burdens. The outlook also considers Barcelona's operational, economic, and financial linkages to the central government.

## Factors that could lead to an upgrade

An upgrade on Barcelona's rating, which is rated on par with the sovereign, would require a similar improvement in the Government of Spain's rating.

## Factors that could lead to a downgrade

A downgrade of Spain's rating would likely have similar implications for Barcelona's rating. Factors such as fiscal slippage, rapidly rising debt levels, or the emergence of significant liquidity risks would also put downward pressure on the ratings of Barcelona.

## Key indicators

Exhibit 2

### City of Barcelona

Year ending 31 December

	2019	2020	2021	2022	2023	2024	2025E	2026E	2027E
Primary Operating Balance / Operating Revenue	17.3	14.4	17.3	14.4	13.0	16.3	15.8	17.0	16.7
Financing Surplus (Deficit) / Operating Revenue	3.3	3.7	1.2	-1.5	-0.6	1.2	-4.9	-1.8	-1.7
Net Direct and Indirect Debt (NDID) / Operating Revenue	27.7	27.8	26.6	34.3	39.2	36.9	35.9	36.3	33.7
Interest Payments / Operating Revenue	0.7	0.5	0.4	0.5	0.9	1.1	1.2	1.2	1.0
Capital Expenses / Total Expenses	16.0	12.1	17.4	18.1	18.8	18.6	21.1	19.2	19.1
Cash and Cash Equivalents / Operating revenue	20.6	22.9	22.2	21.9	24.9	23.1	23.8	22.2	21.7

Sources: City of Barcelona and Moody's Ratings

## Detailed credit considerations

On 30 September 2025, we upgraded Barcelona's rating to A3 from Baa1 and changed its outlook to stable from positive. The entity's Baseline Credit Assessment (BCA) was also upgraded by one notch to a3 from baa1.

The upgrade follows our decision to upgrade the Government of Spain's sovereign ratings to A3 from Baa1 and change its outlook to stable from positive on 26 September 2025. The rating action reflects the strong correlation between the credit profile of Barcelona and the Government of Spain, stemming from their institutional, operational and financial links. The upgrade of Spain's rating translates into reduced systemic risk for Barcelona. Spain's improved economic and fiscal health, indicated by its rating upgrade, suggests increased predictability of state transfers to Barcelona, supporting our expectation that the entity will maintain strong financial fundamentals. Additionally, the upgrade also reflects the entity's intrinsic strengths, such as a very good liquidity profile, with recent positive trends likely to continue over the coming years.

The credit profile of the City of Barcelona, as expressed in its A3 rating, combines its Baseline Credit Assessment (BCA) of a3 and a strong likelihood of extraordinary support from the central government if the city faces acute liquidity stress.

## Profile

Barcelona is the capital of the region of [Catalunya](#) (Ba1 positive) and the second most populous city in Spain, with 1.7 million residents, accounting for around 3.5% of the country's population and nearly 21% of the region's. The city has a diversified, service-oriented economy with strong tourism, commerce, transportation and professional services sectors. Barcelona is responsible for key local functions including urban planning, public transport, housing and social services. It operates within a framework defined by national legislation, with limited fiscal autonomy and significant reliance on intergovernmental transfers.

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.moody's.com> for the most updated credit rating action information and rating history.

## Baseline Credit Assessment

### Robust governance and financial management

Barcelona's strong governance and effective management are clearly demonstrated through its prudent budgetary practices, illustrated by the city's commitment to sound financial outcomes, as set out in its Plan de Actuación Municipal. The plan targets operating surpluses exceeding 15% of operating revenue and debt levels below 60% of operating revenue, and ensures prompt payments to suppliers, with an average payment period of 21.7 days in 2024. These fiscal objectives have been pursued despite the Spanish government's suspension of fiscal rules for the entire public sector from 2020 to 2023, a measure intended to alleviate pressure on regional and local economies.

The city's internal controls and financial planning are of high quality, supporting a disciplined and forward-looking fiscal framework. Barcelona also adopts a conservative approach to managing debt and investments, which helps limit its exposure to market risks. This is complemented by comprehensive financial reporting, which enhances transparency, and supports effective fiscal and debt management.

In addition, Barcelona has been one of the first European cities to integrate climate budgeting. We view climate budgets as a governance and important disclosure tool, providing transparency and accountability in tracking the progress of cities towards their transition goals. This includes developing greenhouse gas (GHG) emissions inventories, planning transition projects and allocating spending on long-term initiatives.

### Strong operating performance

Barcelona has a consistent track record of strong financial performance, which was reaffirmed in 2024, when the city's POB reached 16% of operating revenue, up from 13% in 2023. This improvement was supported by a 7% increase in tax revenue and robust year-on-year growth in intergovernmental transfers of 18%, which was slightly above the five-year average. This significant increase in transfers from the central government was mainly due to an exceptionally favourable settlement of the regional funding system for 2022, which was received in 2024 and was around double the amount in a normal year. We expect these resources to normalise in 2025.

Operating expenditure grew more slowly than revenue, increasing by 6.6% in 2024, excluding interest payments. This was mainly due to an 8% rise in spending on goods and services, along with a 6% increase in transfers to the city's public sector. Personnel costs, largely influenced by central government decisions on pay, grew by 5% due to salary increases and the addition of around 182 civil servants in 2024, primarily police officers and firefighters.

Capital spending increased slightly in 2024, reaching €727 million and representing 18% of total expenditure, in line with previous years. This level of investment was fully financed through the city's strong operating performance and capital revenue, resulting in a financing surplus of €44 million, equivalent to 1.2% of operating revenue. This marks a notable improvement from the €20 million deficit recorded in 2023, which represented -0.6% of operating revenue.

### Low debt and a very good liquidity profile

Barcelona had a debt burden of 37% as of year-end 2024 (39% in 2023), significantly below the median of 48% for the European cities we rate. We expect this figure to continue to decline and to remain well below the city's self-imposed ceiling of 60% throughout 2025-27. By 2025, we project the debt burden will fall to 36%, and further to 34% by 2027. This decrease is mainly based on expected higher revenue and no recourse to new debt in 2025.

While the city's debt service will remain low, it is projected to increase over the next two years due to higher debt repayments scheduled for 2025 and 2026. We estimate it will average 4% of operating revenue during 2025-27, which is slightly above the 2.8% recorded in 2024.

Barcelona's direct debt increased by around 2% in 2024, while its total indirect debt increased by around 9%. This was mainly due to the increase in debt incurred by the Instituto Municipal de la Vivienda y Rehabilitación de Barcelona (IMHAB), totalling €350 million (€318 million in 2023). The IMHAB is the city's public housing company, which aims to build around 2,500 houses by 2025, of which around 2,000 will be for social renting. Since 2022, the IMHAB has been reclassified by the state's audit agency (IGAE) as a non-self-supporting entity. This reclassification led to an increase in the city's net direct and indirect debt (NDID) ratio in that year. Additionally, the city's debt includes €16 million (equivalent to 1% of operating revenue) from Mercabarna, the local wholesale food market. However, we do not include this in the NDID, as Mercabarna is considered a self-supporting entity.

Barcelona's debt structure is straightforward and entirely euro-denominated. Bank loans account for 93% of the total, with the remainder comprising loans from private lenders, including a sustainable bond. Nearly 58% of the NDID is at variable interest rates. The average maturity decreased slightly to 7.8 years in 2024 from 7.9 in 2023. The city does not have any outstanding guarantees.

The city's liquidity position is very strong, with cash holdings of €869 million as of year-end 2024. This accounts for around 23% of its operating revenue, compared with €847 million, or 25% of operating revenue, a year earlier. The available cash is more than sufficient to cover the €79 million in debt repayments due in 2025. Furthermore, this high level of liquidity covers around 84% of Barcelona's outstanding direct debt, serving as a strong buffer against any unexpected treasury need, which is credit positive. We expect the city's liquidity to remain at a similar level by year-end 2025.

#### **Large and diversified economy**

Barcelona is one of the wealthiest cities in Spain. It is the second most populous city in the country, following the city of [Madrid](#) (A3 stable). Over the past three years, Barcelona's population has grown at a faster pace than the national average, driven by inward migration. The city hosts a significant foreign population, with 25% of residents being foreign nationals, reflecting Barcelona's strong international appeal and sustained attractiveness.

Barcelona's economy is primarily concentrated in the services sector, with key areas including commerce, transportation, hospitality and professional activities. The city demonstrates specialisation in certain industries, such as information and communication, financial services and advertising. Tourism is a particularly important sector, accounting for around 12% of the city's GDP. It has shown buoyant growth since the pandemic, with the number of nights spent by tourists in the city exceeding pre-pandemic levels by 4.4%. In 2024, Barcelona's airport reached a record 55 million passengers, 10% more than in 2023.

Barcelona's economic growth continued to outpace national growth, with GDP expanding by 3.8% in 2024, compared with 3.2% for Spain, according to the city's Municipal Data Office. The most dynamic sectors were real estate, professional activities and hospitality. The labour market also continued to strengthen, as the registered unemployment rate fell to 7.1% in the first quarter of 2025, well below the national average of 11.5%. At the same time, both the activity rate (83.3%) and the employment rate (77.4%) remained above national levels (75.7% and 67%, respectively).

#### **Limited fiscal flexibility**

The City of Barcelona relies primarily on transfers from the central government for its revenue, which accounted for around 49% of its operating revenue in 2024. Additionally, the city has limited flexibility in setting tax rates, as the central government determines the minimum and maximum thresholds. However, the city retains some capacity to increase revenue within the limits set by the central government. It could generate nearly €1.5 billion in additional revenue by applying the maximum allowable rate for property tax (around €2 billion when including all direct taxes) — Barcelona's main local tax, which accounts for about 20% of its operating revenue and around 57% of its total tax revenue. Furthermore, eliminating current fiscal benefits and subsidies could increase the city's tax collection by an estimated €103 million.

On the expenditure side, Barcelona faces significant payroll costs, similar to other Spanish local governments. While municipalities control staffing levels, wage increases are largely determined by decisions made at the national level, leaving municipalities with limited flexibility.

#### **Extraordinary support considerations**

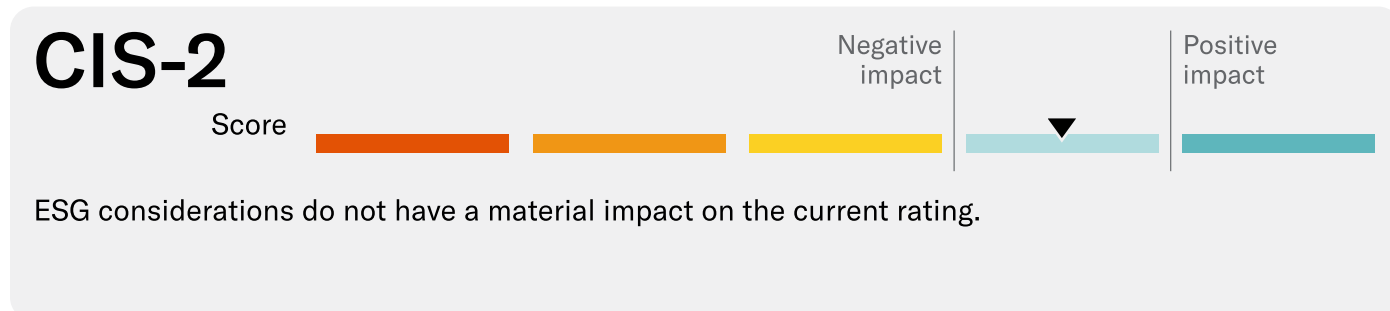
Barcelona has a strong likelihood of receiving extraordinary support from the central government, reflecting our assessment of risk to the government's reputation if the city defaults. The central government promotes greater accountability for Spanish municipalities. Barcelona's strategic role in Spain 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 3

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 4

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 [here](#) to go to the landing page for the entity/transaction on MDC and view the ESG Scores section.

## Rating methodology and scorecard factors

The assigned BCA of a3 is in line with the suggested BCA scorecard-indicated outcome of a3.

For details on our rating approach, please refer to [Regional and Local Governments rating methodology](#).

Exhibit 5

### Barcelona, City of Regional & Local Governments

Baseline Credit Assessment – Scorecard	Score	Value	Sub-factor Weighting	Sub-factor Score	Factor Weighting	Total
<b>Factor 1: Economy</b>					<b>25%</b>	<b>0.68</b>
Regional Income [1]	0.50	106157.03	15%	0.07		
Economic Growth	9.00	baa	5%	0.45		
Economic Diversification	3.00	aa	5%	0.15		
<b>Factor 2: Institutional Framework and Governance</b>					<b>30%</b>	<b>1.80</b>
Institutional Framework	9.00	baa	15%	1.35		
Governance	3.00	aa	15%	0.45		
<b>Factor 3: Financial Performance</b>					<b>20%</b>	<b>0.95</b>
Operating Margin [2]	5.14	16.30%	10%	0.51		
Liquidity Ratio [3]	2.66	23.07%	5%	0.13		
Ease of Access to Funding	6.00	a	5%	0.30		
<b>Factor 4: Leverage</b>					<b>25%</b>	<b>0.74</b>
Debt Burden [4]	2.77	36.89%	15%	0.42		
Interest Burden [5]	3.29	1.10%	10%	0.33		
<b>Preliminary BCA Scorecard-Indicated Outcome (SIO)</b>						<b>(4.17) aa3</b>
<b>Idiosyncratic Notching</b>						<b>0.0</b>
<b>Preliminary BCA SIO After Idiosyncratic Notching</b>						<b>(4.17) aa3</b>
<b>Sovereign Rating Threshold</b>						<b>A3</b>
<b>Operating Environment Notching</b>						<b>0.0</b>
<b>BCA Scorecard-Indicated Outcome</b>						<b>(7.00) a3</b>
<b>Assigned BCA</b>						<b>a3</b>

[1] Regional GDP per capita in terms of purchasing power parity (PPP) terms, in international dollars

[2] Primary Operating Balance / Operating Revenue

[3] Cash and Cash Equivalents / Operating Revenue

[4] Net Direct and Indirect Debt / Operating Revenue

[5] Interest Payments / Operating Revenue

Source: Moody's Ratings; Fiscal 2024.

## Ratings

Exhibit 6

Category	Moody's Rating
<b>BARCELONA, CITY OF</b>	
Outlook	Stable
Baseline Credit Assessment	a3
Issuer Rating	A3

Source: Moody's Ratings

© 2025 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 MODEL.

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 Moody's Investors Service, Inc. for credit ratings opinions and services rendered by it. MCO and all MCO entities that issue ratings under the "Moody's Ratings" brand name ("Moody's Ratings"), also maintain policies and procedures to address the independence of Moody's Ratings' 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 [ir.moody.com](http://ir.moody.com) under the heading "Investor Relations — Corporate Governance — Charter and Governance 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 Clasificadora 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 61 003 399 657 AFSL 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 and Net Zero Assessments (as defined in Moody's Ratings Rating Symbols and Definitions): Please note that neither a Second Party Opinion ("SPO") nor a Net Zero Assessment ("NZA") is a "credit rating". The issuance of SPOs and NZAs is not a regulated activity in many jurisdictions, including Singapore. JAPAN: In Japan, development and provision of SPOs and NZAs fall under the category of "Ancillary Businesses", not "Credit Rating Business", and are not subject to the regulations applicable to "Credit Rating Business" 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.

