

SECTOR IN-DEPTH

28 June 2022



Analyst Contacts

David Rogovic +1.212.553.4196 VP-Senior Analyst david.rogovic@moodys.com

Matt Robinson +44.20.7772.5635 Associate Managing Director matt.robinson@moodys.com

Marie Diron +44.20.7772.1968
MD-Sovereign Risk
marie.diron@moodys.com

Anne Van Praagh +1.212.553.3744 MD-Gbl Sovereign Risk anne.vanpraagh@moodys.com

CLIENT SERVICES

 Americas
 1-212-553-1653

 Asia Pacific
 852-3551-3077

 Japan
 81-3-5408-4100

 EMEA
 44-20-7772-5454

Sovereigns - Africa

Rollover risk increases amid tighter financial conditions and upcoming maturity wall

An upcoming maturity wall and a deterioration in global financial conditions triggered by the Russia-Ukraine conflict will intensify rollover risks for many African sovereigns over the next decade. Less frequent and lower-rated borrowers with low reserve buffers like Ghana (Caa1 stable), Tunisia (Caa1 negative), Kenya (B2 negative) and Egypt (B2 negative) are facing difficulties securing market-based financing and vulnerable to a rise in borrowing costs that could trigger a credit event. Governments have some time to build investor confidence through fiscal consolidation before maturities fall due, but market access to refinancing will rely on market dynamics in coming quarters.

- » A maturity wall is approaching. Maturities on international bonds issued in the previous decade will peak in 2024 and remain elevated for the next decade. This upcoming maturity wall will increase financing pressures, particularly for lower-rated sovereigns with a limited track record of refinancing international bonds.
- Financial conditions are deteriorating as governments are still grappling with successive shocks. Rising borrowing costs has already seen a number of sovereigns postpone or cancel international bond issuance. These more difficult market conditions coincide with increased borrowing requirements as a result of weaker growth and social spending pressures triggered by Russia- Ukraine crisis.
- » Countries at the lower end of the rating scale are most vulnerable to increased rollover risk in a scenario where market remain effectively closed over an extended period of time. Among the African sovereigns we rate, Ghana, Tunisia, Kenya and Egypt are most vulnerable because of relatively low current reserve coverage of principal repayments due between 2022 and 2026 if they are unable to rollover their maturing bonds. Ghana's maturities do not peak until 2026, but fewer financing alternatives increases its credit risks. Gabon (Caa1 stable) and Namibia (B1 stable) will face financing pressure ahead of bond maturities in 2025.
- » Fiscal consolidation that restores investor confidence and an improvement in global financing conditions could ease financing pressure over the next two years. There is still time for sovereigns to refinance large upcoming maturities. An improvement in fiscal metrics in particular would engender investor confidence and increase funding options. The anchor provided by IMF financial support conditionality increases the likelihood of sustainable improvements in programme countries.

Debt maturities will build and remain elevated throughout the remainder of the decade

Maturities on international bonds issued in the previous decade will increase for a number of African sovereigns over the next few years. Maturities will peak in 2024 for the region overall, but remain elevated throughout the decade (see Exhibit 1). The peak in 2024 reflects large debt amortizations falling due in Kenya (\$2.0 billion), Egypt (\$3.3 billion), Morocco (Ba1 negative, \$1.1 billion), and Tunisia (\$962 million). This upcoming maturity wall will increase financing pressures, particularly for lower-rated sovereigns with a limited track record of repaying international bonds. For example, Zambia (Ca stable) who has \$1.0 billion maturing in 2024 is already negotiating a restructuring with creditors, while Ethiopia (Caa2 negative, \$1.0 billion) has applied for relief under the G-20 Common Framework for Debt Treatments beyond DSSI (Common Framework).

Exhibit 1

African sovereigns face a period of larger principal maturities beginning in 2024

Principal payments on outstanding eurobonds (US\$ billion)

	IN \$US BILLION:		Less than 1			1-2		More than 2			
Sovereigns	'22	'23	'24	'25	'26	'27	'28	'29	'30	'31	2032
Egypt		1.8	3.3	3.1	2.7	3.1	2.6	1.8	2.8	2.9	2.8
South Africa	1.0	1.0	1.5	2.0	1.8	1.0	2.0	2.0	1.4		1.4
Nigeria	0.3	0.3		1.1		1.5	1.3	1.3	1.3	1.0	1.5
Ghana					1.0	2.0		2.0	1.0		1.3
Morocco	1.5	1.5	1.1		0.6	0.8			0.6	1.1	1.0
Angola				0.9			1.8	1.8			1.8
Cote d'Ivoire			0.1	0.3			0.8		1.0	1.0	2.4
Kenya			2.0			0.9	1.0				1.2
Tunisia			1.0	1.0	0.8	0.2					
Zambia	0.8	0.8	1.0			1.3					
Gabon			0.1	0.7						1.8	
Senegal			0.2								
Ethiopia			1.0								
Benin					0.2						0.8
Cameroon				0.2							0.8
Mozambique										0.9	
Namibia				0.8							
Rwanda										0.6	
Rep. of the Congo								0.2			
Total	3.6	3.0	11.3	10.0	7.1	10.7	10.5	9.0	8.0	9.3	14.9

Sources: Moody's Investors Service, Bloomberg

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.

Financial conditions are deteriorating as governments are still grappling with successive shocks

Although the prospect of rate increases by central banks in advanced economies was already contributing to a rise in international borrowing costs, Russia's invasion of <u>Ukraine</u> (Caa3 negative) in February 2022 has accelerated this trend (see Exhibits 2 and 3).

Much tighter global financial conditions has already had an impact on future issuance. In fact, only South Africa (Ba2 stable), Angola (B3 stable) and Nigeria (B2 stable) have been able to issue an international bond in 2022, with no issuance since May. Other countries like Kenya have decided to postpone planned debt issuance in response to rising yields. Similarly, Côte d'Ivoire (Ba3 stable) has delayed its issuance plans and instead relied on the regional bond market to meet its financing needs for this year. Nigeria postponed a subsequent bond issuance in May 2022 due to market conditions.

Some like Kenya and Ghana are currently exploring syndicated loans, which tend to have shorter maturities and often prove relatively expensive given the shorter maturities. That said, borrowing costs were already increasing before Russia's invasion of <u>Ukraine</u> (Caa3 negative), as the markets priced in likely rate increases by central banks in advanced economies.

Exhibit 2
Emerging market financial conditions are already tighter than normal, driven by the bond market component
EM Financial Conditions Index

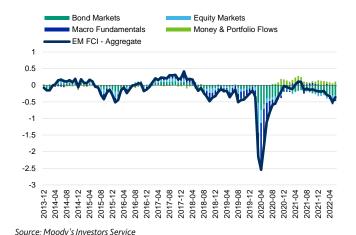
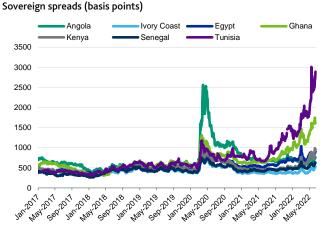


Exhibit 3
Sovereigns spreads have widened since the start of 2022, with many African sovereigns facing prohibitively expensive borrowing costs



* spread data as of June 21, 2022 Sources: Moody's Investors Service, Haver

Financial conditions are deteriorating as governments are still grappling with successive shocks. Many African sovereigns still face deep economic scarring from the pandemic, which has led to revenue losses, delays to planned fiscal consolidation and a sharp rise in debt. Rising energy and food prices as a result of the Russia-Ukraine crisis are also weighing on growth and increasing inflationary pressures (see Exhibit 4). Moreover, challenging economic conditions will make it difficult for policymakers to improve fiscal positions through a combination of tax increases and spending cuts without aggravating already high social risks.

However, for some this fiscal deterioration pre-dates the pandemic. Countries like Zambia, Tunisia, Rwanda (B2 negative), Namibia and Ghana have seen they debt-to-GDP ratios rise by more than 25 percentage points since 2016. Kenya, Côte d'Ivoire and Senegal (Ba3 stable) also saw significant increases in debt burdens, rising by more than 20 percentage points of GDP over the same period. In fact, the average debt burden for the African sovereigns we rate with eurobond debt outstanding is now over 70% of GDP and we project will remain above 70% through 2023 (see Exhibit 5).

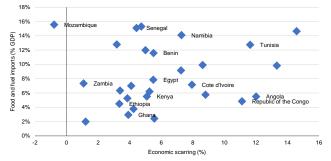
Interest burdens remain low in many cases owing to still sizeable shares of concessional financing. However, this share has deteriorated since 2016 across the region. Debt affordability, as measured by the interest-to-revenue ratio, is weakest in Ghana, Egypt, and Kenya as these sovereigns tend to rely less on concessional financing and more on commercial financing, both externally and domestically. Although domestic financial markets are more developed and offer an alterative funding source, interest rates on domestic borrowing tend to be higher than the cost of borrowing externally. This is reflected in the larger share of domestic interest payments in interest

expenditures. For instance, even though debt is split roughly evenly between domestic and external debt in Kenya, more than three-quarters of interest expenditure is spent on domestic debt.

Exhibit 4

The commodity price shock struck as most African sovereigns are still recovering from the pandemic

Food and energy imports (% GDP) and economic scarring (%), only African sovereigns with eurobonds are labeled



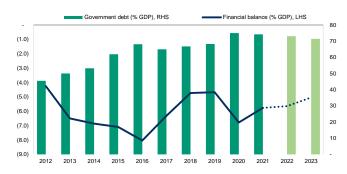
*Economic scarring based on the four-year difference between current forecasts for real GDP and pre-pandemic forecasts. A higher number indicates greater scarring.

Sources: Moody's Investors Service, UNCTAD

Exhibit 5

African sovereign debt levels have increased steadily over the last decade

Government financial balance and government debt, % GDP



* Weighted by nominal GDP, African sovereigns with eurobonds outstanding, excluding South Africa and Nigeria

Source: Moody's Investors Service

Countries at the lower end of the rating scale are most vulnerable

Ghana, Tunisia, Kenya and Egypt are most vulnerable in this environment because their reserves only cover a relatively small amount of the principal repayments due between 2022 and 2026 (if they are unable to rollover their maturing bonds). **Ghana's** limited financing alternatives to international debt issuance leave it exposed to a sustained loss of market access that would precipitate a debt restructuring. This is reflected in our Caa1 rating indicating elevated risks as well as reflected in current prices and spreads on Ghana's outstanding bonds, which are at highly distressed levels. However, its next significant eurobond maturity is 2026, which gives the government time to deliver on promised fiscal consolidation, restore investor confidence and regain market access.

Tunisia's large gross financing needs and limited access to multilateral financing without an IMF financial programme in place elevate its liquidity risks. Tunisia's reserves remain adequate to meet upcoming maturities in 2022, but they have been falling since December 2020 and will continue to decline ahead of the government's 2023 and 2024 maturities without renewed private sector or official sector inflows. Moreover, weakening governance makes its less certain that the government will implement fiscal and economic reform or be able to secure the backstop of IMF financial assistance.

Larger domestic debt markets reduce risks for **Egypt** and **Kenya**, but even if domestic financing met upcoming external maturities, the drain on reserves and larger domestic issuance would increase their already high borrowing costs. In Egypt, we have already seen significant pressure on the government's reserves in response to nonresident outflows, informing the change in outlook to negative in May 2022. Increased imports arising from higher commodity prices are likely to exert further pressures.

In Kenya, limited market access, a political cycle which may lead to a period of policy paralysis and a large \$2.0 billion bullet maturity in 2024 heighten liquidity risks. The prospect of further delays to planned fiscal consolidation, particularly if this leads to delays in disbursements of IMF funding, would put significant strain on Kenya's international reserves.

In the absence of market access, **Namibia's** large 2025 eurobond maturity poses some risks given its relatively thin reserve buffer. The sinking fund the government set up has been significantly drawn down to meet part of its 2021 eurobond maturity, and it is unlikely to have funds to cover the 2025 maturity in total. Like it did in 2021, we expect the government would resort to selling long-term domestic debt sale to the Government Institutions Pension Fund (GPIF) if required.

The large share of international bonds in the debt structure of countries like <u>Benin</u> (B1 stable), Côte d'Ivoire, Gabon and Senegal increases the risk of financing stress if credit quality were to weaken. Currency depreciation poses less of a challenge because their currencies are pegged to the euro. For Benin and Côte d'Ivoire, their lower absolute debt burdens (at or around 50% of GDP) and

favorable maturity profile mean there is low risk of a liquidity event given investor confidence in debt sustainability. A larger revenue pool also means interest only accounts for 10% of revenue in Senegal and 13% in Côte d'Ivoire.

Exhibit 6

Countries at the lower end of the rating scale and high debt burdens are most vulnerable to increased rollover risk

Rating	Country	Government debt/ GDP (2022)	Eurobonds/ GDP	Eurobond debt/total debt	FC- denominated debt/ total debt	Eurobonds (% FC- denominated debt)	Eurobond maturities (2022- 2026) to reserves	Eurobonds/ reserves	Interest/ revenue	Eurobond interest/ total interest payments
Ba1	Morocco	76%	6%	9%	24%	37%	10%	28%	10%	8%
Ba2	South Africa	76%	5%	7%	17%	40%	13%	50%	18%	6%
ВаЗ	Senegal	69%	15%	22%	72%	31%	1%	35%	10%	38%
ВаЗ	Cote d'Ivoire	52%	12%	23%	48%	48%	3%	72%	13%	37%
B1	Benin	49%	10%	21%	66%	31%	2%	15%	15%	24%
B1	Namibia	71%	6%	8%	25%	33%	34%	34%	16%	7%
B2	Cameroon	44%	2%	4%	72%	6%	2%	14%	6%	14%
B2	Egypt	94%	9%	10%	32%	31%	37%	124%	47%	7%
B2	Kenya	71%	6%	9%	51%	18%	22%	78%	29%	9%
B2	Nigeria	32%	3%	10%	31%	32%	4%	37%	29%	10%
B2	Rwanda	79%	6%	8%	69%	11%	4%	41%	7%	19%
В3	Angola	49%	7%	13%	83%	16%	5%	48%	20%	16%
Caa1	Gabon	58%	13%	22%	49%	45%	11%	37%	14%	31%
Caa1	Ghana	81%	14%	18%	51%	36%	14%	141%	55%	14%
Caa1	Tunisia	86%	7%	9%	65%	14%	46%	48%	12%	15%
Caa2	Ethiopia	37%	1%	2%	65%	4%	35%	35%	4%	11%
Caa2	Mozambique	85%	5%	6%	83%	8%	0%	23%	15%	6%
Caa2	Republic of the Congo	83%	2%	2%	64%	4%	0%	3%	8%	5%
Ca	Zambia	104%	9%	8%	58%	14%	88%	150%	20%	17%

Source: Moody's Investors Service

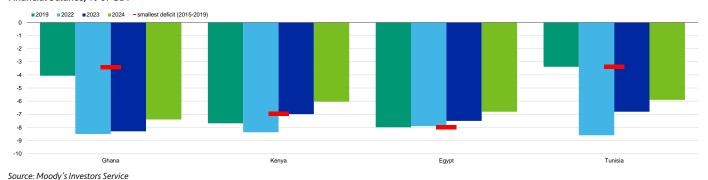
However, it is worth flagging that not all credit events are triggered by missed principal payments. For example, recent defaults in Africa by Zambia and elsewhere in Suriname, Ecuador, Belize and Sri Lanka highlight that financing stress can build long before principal maturities begin falling due. We have highlighted in previous research that other factors like chronic economic stagnation as well as institutional and political factors that prevent reforms to address economic vulnerabilities can be a key trigger of default. Similarly, external shocks like the pandemic can significantly weaken economic activity and government and export revenues. For commodity producers, even a temporary shock to commodity prices that reduces foreign-currency earnings can precipitate a default.

Fiscal consolidation that restores investor confidence and improvement in global financing conditions could ease financing pressure over the next two years

While market conditions today may mean borrowing is prohibitively expensive, some countries like Kenya still intend to access bond markets later this year. Moreover, there is still time for sovereigns with large maturities in 2024 to refinance these near-term maturities. High inflation and social pressures will make fiscal prudence delivery very challenging, and global financial conditions in the second half of this year will be very telling regarding market access to refinancing.

An improvement in fiscal metrics in particular would engender investor confidence and increase funding options. IMF programmes will provide crucial fiscal policy anchors in this regard, particularly in Kenya and Gabon. Egypt, Tunisia, Ghana and Kenya all plan to deliver fiscal consolidation over the next few years. Delivering on fiscal consolidation objectives will be more important for Kenya and Ghana, where fiscal-slippage risks increasing borrowing costs and aggravate already very weak debt-affordability metrics. Ghana's interest-to-revenue ratio is one of the highest among all rated sovereigns, while Kenya's debt interest burden has grown steadily since 2015.

Exhibit 7
Fiscal consolidation plans would narrow deficits by more than one percentage point of GDP in Ghana and Egypt, and by more than two percentage points of GDP in Kenya and Tunisia
Financial balance, % of GDP



Moody's related publications

- » Sector In-Depth: Global Emerging Markets Chartbook June 2022, 08 June 2022
- » **Sector Comment:** Sovereigns Middle East & Africa: Global food and energy price shock raises risk of political and social unrest fueled by rising inflation, 12 May 2022
- » Sector In-Depth: Sovereigns Global: Prolonged high inflation would hurt debt affordability, raise social risk, 25 April 2022
- » Sector In-Depth: Sovereigns Sub-Saharan Africa: Russia-Ukraine shock amplifies pandemic-related credit challenges for region's sovereigns, 07 April 2022
- » **Outlook**: Sovereigns Sub-Saharan Africa: 2022 outlook negative amid fragile, recovery, persistent external risks and limited scope for adjustment, 17 November 2021
- » Rating Methodology: Sovereign Ratings Methodology, 25 November 2019

To access any of these reports, click on the entry above. Note that these references are current as of the date of publication of this report and that more recent reports may be available. All research may not be available to all clients.

© 2022 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 BY MOODY'S (COLLECTIVELY, "PUBLICATIONS") 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 PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S PUBLICATIONS 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 PUBLICATIONS ON NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS ARE NOT AND DO NOT CONSTITUTE OR PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. MOODY'S CREDIT RATINGS, ASSESSMENTS AND OTHER OPINIONS AND PUBLICATIONS 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 PUBLICATIONS 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 PUBLICATIONS 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.

MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS 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 rating process or in preparing its Publications.

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 fees ranging from \$1,000 to approximately \$5,000,000. 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 and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at www.moodys.com under the heading "Investor Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

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 Japan only: Moody's Japan K.K. ("MJKK") is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly-owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MJKK. MSFJ is not a Nationally Recognized Statistical Rating Organization ("NRSRO"). Therefore, credit ratings assigned by MSFJ are Non-NRSRO Credit Ratings. Non-NRSRO Credit Ratings are assigned by an entity that is not a NRSRO and, consequently, the rated obligation will not qualify for certain types of treatment under U.S. laws. MJKK and MSFJ are credit rating agencies registered with the Japan Financial Services Agency and their registration numbers are FSA Commissioner (Ratings) No. 2 and 3 respectively.

MJKK or MSFJ (as applicable) hereby disclose that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MJKK or MSFJ (as applicable) have, prior to assignment of any credit rating, agreed to pay to MJKK or MSFJ (as applicable) for credit ratings opinions and services rendered by it fees ranging from JPY100,000 to approximately JPY550,000,000.

MJKK and MSFJ also maintain policies and procedures to address Japanese regulatory requirements.

REPORT NUMBER

1330400

CLIENT SERVICES

 Americas
 1-212-553-1653

 Asia Pacific
 852-3551-3077

 Japan
 81-3-5408-4100

 EMEA
 44-20-7772-5454

