

**CREDIT OPINION**

13 December 2024

New Issue

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**Closing date**

January 2010

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**CCF SFH – Mortgage Covered Bonds**

New Issue – French covered bonds

**Ratings**

Exhibit 1

| Cover Pool (€) | Ordinary Cover Pool Assets | Covered Bonds (€) | Rating |
|----------------|----------------------------|-------------------|--------|
| 4,663,679,951  | Residential Mortgage Loans | 3,500,000,000     | Aaa    |

All data in the report is as of September 30, 2024 unless otherwise stated

Source: Moody's Ratings

**Summary**

The covered bonds issued by CCF SFH (a Société de Financement de l'Habitat) (the issuer, unrated) under its €10 billion CCF SFH - Mortgage Covered Bonds programme are full recourse to the issuer and are secured by a cover pool of assets consisting almost entirely of residential mortgage loans (96.3%) in France along with other supplementary assets (3.7%).

Credit strengths include the credit strength of CCF (the sponsor bank, borrower or collateral provider, A3(cr)) and the benefit from two layers of protection by having full recourse of the covered bonds to the issuer and the support provided by the French legal framework for *Sociétés de Financement de l'Habitat* (SFH) ([the SFH law](#)), which provides for the issuer's regulation and supervision.

Credit challenges include the high level of dependency on the issuer. As with most covered bonds in Europe, there are few restrictions on the future composition of the cover pool. The cover pool also has geographical concentration risk.

Our credit analysis takes into account the cover pool's credit quality, which is reflected in the collateral score of 2.0%, and the over-collateralisation (OC) of 33.2% (on a nominal value basis) as of 30 September 2024.

In general, we consider environmental and governance credit risks to be low and social credit risks to be moderate for this transaction. Environmental credit risk is low in this programme as covered bondholders benefit from the cover pool's geographical diversification. Social credit risk is moderate in this programme, mainly because social issues that affect lenders can also affect the cover pool. Social credit risks are mitigated by the cover pool's diversification. Governance credit risk is low in this programme due to (i) French covered bond law; and (ii) the fact that the issuer is a regulated entity and maintains the cover pool on the issuer's group balance sheet, incentivising it to maximise cover pool value and aligning its interest with that of covered bond investors. For further details, please see "ESG Considerations" section below.

## Credit strengths

- » **Recourse to the issuer:** The covered bonds are full recourse to the issuer CCF SFH, which is licensed as an SFH, a specialised credit institution wholly owned by the sponsor bank, CCF. Through the collateralised loan structure, the issuer itself has a recourse against the sponsor bank. (See "Covered bond description")
- » **Support provided by the French legal framework - Société de Financement de l'Habitat (the SFH law):** The covered bonds are governed by the SFH law, which provides for the issuer's regulation and supervision, and sets certain minimum requirements for the covered bonds and the cover pool. (See "[France - Legal Framework for Covered Bonds](#)")
- » **High credit quality of the cover pool:** The covered bonds are supported by a cover pool of high-quality assets. Most of the assets are residential mortgage loans backed by properties in France. The collateral quality is reflected in the collateral score, which is currently 2.0%. (See "Cover pool analysis")
- » **Refinancing risk:** Following what we call a covered bond (CB) anchor event, refinancing risk would be mitigated by a well-established and deep market for French *Obligations de Financement de l'Habitat*, as well as the liquidity-matching requirements. Furthermore, following the insolvency of the issuer, the covered bonds would continue to be paid according to their original scheduled maturity dates, in accordance with the SFH law. A CB anchor event occurs when the issuer, or another entity within the issuer group that supports the issuer, ceases to service the payments on the covered bonds. (See "Covered bond analysis")
- » **Liquidity facility:** as per the SFH law, the issuer is required to maintain a 180-day liquidity buffer at all times. (See "Covered bond analysis")
- » **Level of OC available to bondholders:** The sponsor supports the covered bond programme with an OC commitment of 5%. (See "Covered bond description")
- » **Supervision:** The issuer is a licensed financial institution regulated by the Autorité de Contrôle Prudentiel et de Résolution (ACPR). Pursuant to the SFH law, the issuer must appoint a specific controller (*contrôleur spécifique*) with the approval of the ACPR. (See "Covered bond analysis")

## Credit challenges

- » **High level of dependency on the issuer:** As with most covered bonds, before the insolvency of the issuer, the issuer can materially change the nature of the programme. For example, the issuer can add new assets to the cover pool, issue new covered bonds with varying promises and enter into new hedging arrangements. Also, similar to most of the covered bonds in Europe, this programme has few restrictions on the future composition of the cover pool. These changes could affect the credit quality of the cover pool as well as the overall refinancing and market risks. Further, if the quality of the collateral deteriorates below a certain threshold, the issuer would have the ability, but not the obligation, to increase the OC in the cover pool. (See "Covered bond analysis")
- » **Cover pool concentration:** The cover pool has geographical concentrations, with all of the loans backed by properties in France and in particular in Île-de-France (48.1%). (See "Cover pool analysis")
- » **Market risks:** Following a CB anchor event, covered bondholders, to achieve timely principal payment, might need to rely on proceeds raised through the sale of, or borrowing against, the cover pool assets. The market value of these assets may be subject to high volatility after a CB anchor event. In addition, covered bondholders might have exposure to interest rate risk. (See "Covered bond analysis")
- » **Time subordination:** After a CB anchor event, later-maturing covered bonds are subject to time subordination. Principal cash collections may be used on a first-come, first-served basis, paying earlier-maturing covered bonds before later-maturing covered bonds. This subordination could lead to the erosion of OC before any payments are made to later-paying covered bonds. (See "Covered bond analysis")

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.

## Key characteristics

Exhibit 2

### Covered bond characteristics

|                                      |   |
|--------------------------------------|---|
| Moody's Programme Number:            | 531   |
| Issuer:                              | CCF SFH   |
| Covered Bond Type:                   | Residential mortgage covered bonds                  |
| Issued under Covered Bonds Law:      | Yes   |
| Applicable Covered Bonds Law:        | French Covered Bond Act                             |
| Entity used in Moody's TPI analysis: | CCF   |
| CR Assessment:                       | A3(cr)  |
| CB Anchor:                           | CR assessment +1 notch                              |
| Deposit rating:                      | Baa2  |
| Total Covered Bonds Outstanding:     | €3,500,000,000                                      |
| Main Currency of Covered Bonds:      | EUR (100.0%)  |
| Extended Refinance Period:           | Yes (12 months)                                     |
| Principal Payment Type:              | Soft bullet   |
| Interest Rate Type:                  | Fixed rate covered bonds (100.0%)                   |
| Committed Over-Collateralisation:    | 5.0% (on a nominal basis)                           |
| Current Over-Collateralisation:      | 33.2% (on a nominal basis)                          |
| Intra-group Swap Provider:           | n/a   |
| Monitoring of Cover Pool:            | Supervision of French Financial Authorities ( ACPR) |
| Trustees:                            | n/a   |
| Timely Payment Indicator:            | Probable-High                                       |
| TPI Leeway:                          | 1 notch   |

Sources: Moody's Ratings and issuer data

Exhibit 3

### Cover pool characteristics

|   |   |
|---|---|
| Size of Cover Pool:                           | €4,663,679,951  |
| Main Collateral Type in Cover Pool:           | Residential assets (96.3%), Other supplementary assets (3.7%) |
| Main Asset Location of Ordinary Cover Assets: | France  |
| Main Currency:                                | EUR (100.0%)  |
| Loans Count:                                  | 38,095  |
| Number of Borrowers:                          | 29,796  |
| WA Unindexed LTV:                             | 52.8%   |
| WA Indexed LTV:                               | 40.3%   |
| WA Seasoning (in months):                     | 76  |
| WA Remaining Term (in months):                | 137   |
| Interest Rate Type:                           | Fixed rate assets(100.0%)                                     |
| Collateral Score:                             | 2.0%  |
| Cover Pool Losses:                            | 16.3%   |
| Further Cover Pool Details:                   | See Appendix 1  |
| Pool Cut-off Date:                            | 30 September 2024   |

Sources: Moody's Ratings and issuer data

Exhibit 4

**Transaction counterparties**

| Counterparty Type            | Transaction Counterparty |
|------------------------------|--------------------------|
| Sponsor                      | CCF                      |
| Servicer                     | CCF                      |
| Back-up Servicer             | n/a                      |
| Back-up Servicer Facilitator | n/a                      |
| Cash Manager                 | CCF                      |
| Back-up Cash Manager         | n/a                      |
| Account Bank                 | HSBC Continental Europe  |
| Standby Account Bank         | n/a                      |
| Account Bank Guarantor       | n/a                      |

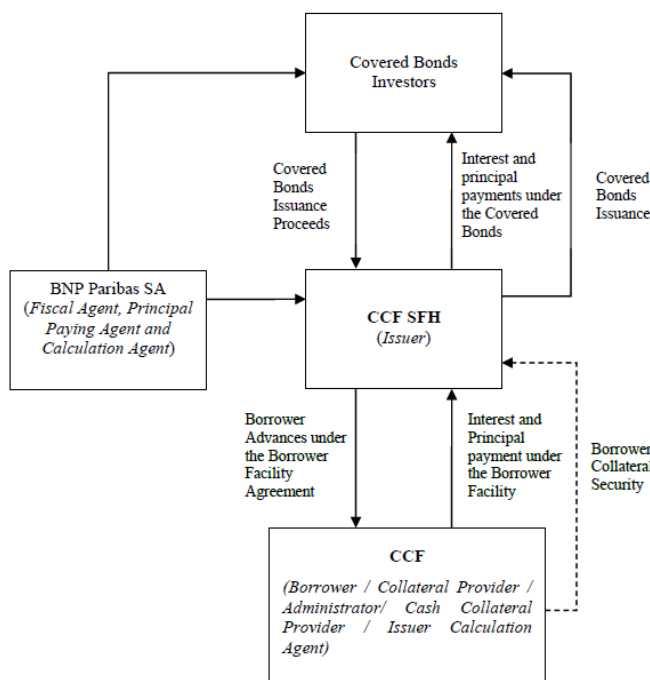
Sources: Moody's Ratings and issuer data

**Covered bond description**

The covered bonds issued under the mortgage covered bond programme of CCF SFH are full recourse to the issuer. Upon a CB anchor event, covered bondholders would have access to a cover pool of residential home loans.

**Structural diagram**

Exhibit 5



Source: Issuer

**Structure description**

**The bonds**

Bonds with a “soft bullet” maturity benefit from a twelve months maturity extension. This extension will occur automatically if the issuer fails to redeem the covered bonds on their scheduled maturity date. As of date of the publication, 100% of the bonds had a soft bullet maturity.

The proceeds of the covered bond issuances are on-lent by the issuer to the sponsor bank by way of borrower advances under a facility agreement. The repayment of the borrower advances is secured by the collateral security to be made available by the sponsor bank and

the collateral providers in line with the programme documents. The terms and conditions of the borrower advances mirror the final terms of the corresponding covered bonds.

#### Issuer recourse

The covered bonds are full recourse to the issuer. Therefore, the issuer is obliged to repay principal and pay interest on the covered bonds.

As a result of the borrower advances described above, the sponsor bank (rated A3(cr)) owes to the issuer, under the borrower advances, amounts equivalent to interest and principal due under the covered bonds.

#### Recourse to cover pool and over-collateralisation

The holders of the covered bonds will have the indirect benefit of the collateral security constituted of French residential home loans. The obligations under the collateral security agreement, including the obligation to cure any breach of the asset cover test (ACT), will be secured pursuant to the terms of the collateral security (*remise à titre de garantie*) created in accordance with articles L.211-38 of the Monetary and Financial Code over the home loans satisfying the eligibility criteria. (See "Cover pool description" for the cover pool characteristics and "Cover pool analysis" for our analysis of the pool).

As of September 2024, the level of OC in the programme was 33.2% on a nominal value basis.

The current covered bond rating relies on:

- A level of OC that meets the minimum legal requirements of the French legal framework, whereby the OC must exceed the principal balance of the bonds by 5.0%.
- The 5% committed OC provided by the sponsor bank under the ACT.

Based on data as of 30 September 2024, the OC consistent with the current covered bond rating is 16.0%. This shows that our analysis does currently rely on OC that is not in a committed form.

Although the issuer has the ability to increase the OC in the cover pool if collateral quality deteriorates below a certain threshold, the issuer does not have any obligation to do so. The failure to increase OC following a deterioration in the collateral could lead to a negative rating action.

#### Legal framework

The covered bonds are governed by the SFH law, which provides for the issuer's regulation and supervision, and sets certain minimum requirements for the covered bonds and the cover pool. (See [France - Legal Framework for Covered Bonds](#), June 2022, for a description of the general legal framework for *Obligations de Financement de l'Habitat* governed by the SFH Law).

#### Other structural features

In accordance with the terms of a prematurity test, the sponsor bank is required to fund a cash collateral reserve if its short-term senior unsecured debt rating falls below P-1. This reserve will be equal to the amount of principal that will become due under the hard bullet covered bonds, if any, for the following 180 days. All amounts payable by the sponsor bank in accordance with the prematurity test must be deposited in an account in the name of the issuer with a bank whose short-term senior unsecured debt rating is a least P-1.

### Covered bond analysis

Our credit analysis of the covered bonds primarily focuses on the issuer's credit quality, refinancing risk, interest rate risk and currency risk, as well as the probability that payments on the covered bonds would be made in a timely fashion following a CB anchor event, which we measure using the Timely Payment Indicator (TPI) (See "Timely Payment Indicator").

#### Primary analysis

##### Issuer analysis - Credit quality of the issuer

The issuer CCF SFH is unrated. It is 100% owned by CCF (the sponsor, rated A3(cr) / P-2(cr)).

The reference point for the sponsor's credit strength in our analysis is the CB anchor, which for covered bond programmes under the covered bond law in France is the Counterparty Risk (CR) Assessment plus one notch.

The covered bond rating is linked to the credit strength of the sponsor bank, CCF, mainly because of the structure of the borrower advances described in the "Covered bond description" section. The support provided by the sponsor bank means that the reference point for our analysis will be the CB anchor of CCF. The sponsor bank's commitment to the covered bond programme is further underlined by the range of functions it carries out on behalf of the issuer.

The issuer is a specialist credit institution, so it may continue to operate for a period after CCF defaults. CCF's CR Assessment is A3(cr). For a description of the sponsor bank's rating drivers, see its [Credit Opinion](#), published in December 2024.

#### **Issuer analysis - Dependency on the issuer's credit quality**

The credit quality of the covered bonds depends primarily on the credit quality of the sponsor bank. If the sponsor bank's credit strength were to deteriorate, there would be a greater risk that a CB anchor event would occur, leading to refinancing risk for the covered bonds. Consequently, the credit quality of the covered bonds would deteriorate unless other credit risks were to decrease.

In the event that the CB anchor deteriorates, the issuer would have the ability, but not the obligation, to increase the OC in the cover pool. Failure to increase the level of OC under these circumstances could lead to a negative rating action.

Under the programme, the sponsor bank and its subsidiaries act as (1) borrower, (2) collateral provider, (3) issuer calculation agent, (4) cash collateral provider, and (5) administrator. The holders of the covered bonds will have the indirect benefit of the collateral security comprising eligible assets pledged by the collateral providers.

The appropriate level of collateral is secured through the ACT. In case the ACT is not complied with, the sponsor bank shall cure such noncompliance by causing the collateral provider to grant additional eligible assets, and this noncompliance must be cured within one month. During that period, the issuer will cease to grant any further borrower advances and no further covered bonds can be issued. If the ACT is not cured before the next monthly ACT date, this would constitute a breach of ACT and a borrower event of default will have occurred.

Reasons for the high level of dependency of the covered bonds with the issuer also include exposure to decisions made by the issuer in its discretion as manager of the covered bond programme. For example, before a CB anchor event, the issuer may add new assets to the cover pool and remove assets from the cover pool, issue further bonds and enter new hedging arrangements. Such actions could reduce the value of the cover pool.

As with most of the covered bonds in Europe, there are few contractual restrictions on the future composition of the cover pool, which creates substitution risk. Nevertheless, cover pool quality over time will be protected by, among other things, the requirements of the SFH law, which specifies what types of assets are eligible. (See "[France - Legal Framework for Covered Bonds](#)")

#### **Refinancing risk**

Following a CB anchor event, the "natural" amortisation of the cover pool assets alone cannot be relied on to repay the principal. We assume that funds must be raised against the cover pool at a discount if covered bondholders are to receive timely principal payment. Where the portion of the cover pool that is potentially exposed to refinancing risk is not contractually limited, our expected loss analysis typically assumes that this amount is in excess of 50% of the cover pool.

After a CB anchor event, the market value of these assets may be subject to volatility. Examples of the stressed refinancing margins we use for different types of prime-quality assets are published in our Rating Methodology. (See "[Moody's Approach to Rating Covered Bonds](#)")

The refinancing-positive factors outweigh the negative ones. The refinancing-positive aspects of this covered bond programme include:

- » The requirement in the SFH law to maintain a 180-day liquidity buffer at all times.
- » Soft bullet covered bonds have a 12-month extension period and if any hard bullet covered bonds were to be issued they would benefit from a prematurity test.
- » The SFH legal framework, which guarantees that the insolvency of the issuer will not trigger an acceleration of the covered bonds.
- » The ability of the issuer to sell or transfer part or all of the cover pool.

- » The legal requirement to limit asset-liability mismatches: Under the covered bond law, the difference between the weighted average life (WAL) of the cover pool (up to 105% of the covered bonds) and the WAL of the outstanding covered bonds must not exceed 18 months.

The refinancing-negative aspects of this covered bond programme include:

- » Home loans in the pool are secured by third-party guarantors (*société de cautionnement*). In the scenario of a combined default of the sponsor bank and of the guarantor, the refinancing cost of the home loans that have lost their guarantee, and which, as a consequence, have become unsecured loans, cannot be estimated on the basis of historical data because such *société de cautionnement* has never been subject to bankruptcy.
- » There is no interest rate or currency swap in place in the programme and any unhedged exposure to market risk may cause a reduction in the value of the cover pool.

### Interest rate and currency risk

As with most European covered bonds, there is potential for interest rate and currency risks, which could arise from the different payment promises and durations made on the cover pool and the covered bonds.

Exhibit 6

#### Overview of assets and liabilities

|               | WAL Assets (Years) | WAL Liabilities (Years) | Assets (%) | Liabilities (%) |
|---------------|--------------------|-------------------------|------------|-----------------|
| Fixed rate    | 6.4                | 3.1                     | 100.0%     | 100.0%          |
| Variable rate | n/a                | n/a                     | 0.0%       | 0.0%            |

WAL = Weighted average life.

Sources: Moody's Ratings and issuer data

In the event of issuer insolvency, we currently do not assume that the insolvency administrator would always be able to efficiently manage any natural hedge between the cover pool and the covered bonds. Therefore, following a CB anchor event, our model would separately assess the impact of increasing and decreasing interest rates on the expected loss of the covered bonds, taking the path of interest rates that leads to the worst result. The interest rate and currency stresses used over different time horizons are published in our Rating Methodology.

Aspects of this covered bond programme that are market-risk positive include:

- » No currency risk: As of the pool cutoff date, all of the covered bonds and all of the cover pool assets are denominated in euro, so there is no currency risk in the programme.

Aspects of this covered bond programme that are market-risk negative include:

- » There is no swap in place to hedge the interest rate risk.
- » A potential sale of fixed-rate assets to meet payments due on covered bonds following a CB anchor event could lead to a crystallisation of mark-to-market losses caused by interest rate movements upon issuer default. All of the cover pool assets are fixed-rate loans.

### Timely Payment Indicator

Our TPI assesses the likelihood that timely payments would be made to covered bondholders following a CB anchor event, and thus determines the maximum rating a covered bond programme can achieve with its current structure while allowing for the addition of a reasonable level of OC. We have assigned a TPI of Probable-High to these covered bonds, in line with other mortgage covered bonds issued under the SFH law.

Based on the current TPI of Probable-High, the TPI leeway for this programme is one notch. This one-notch leeway implies that we might downgrade the covered bonds' rating because of a TPI cap if we were to lower the CB anchor by more than one notch, all other variables being equal.

The TPI-positive aspects of this covered bond programme include:

- » The ACT, designed to ensure that the cover pool has substantial value at the time of the occurrence of the borrower event of default.
- » The extendable maturity of the soft bullet covered bonds and the prematurity test for the hard bullet covered bonds.
- » The SFH legal framework, which guarantees that an insolvency of the issuer will not accelerate payments under the covered bonds.
- » The credit quality of the cover pool assets, reflected by the collateral score of 2.0%.
- » The positive factors mentioned in the "Refinancing risk" and "Interest rate and currency risk" sections above.

The TPI-negative aspects of this covered bond programme include:

- » The negative factors mentioned in the "Refinancing risk" and "Interest rate and currency risk" sections above.

## Additional analysis

### Liquidity

Cash flow from the assets may not be sufficient to meet the repayment obligations of the covered bonds issued under the programme. However, covered bondholders benefit from:

- » The intervention of the specific controller, whose role is, among others, to monitor the balance between the issuer's assets and liabilities, and notify the issuer and the ACPR if it considers this balance to be unsatisfactory.
- » A 180-day liquidity buffer as provided by the SFH law.
- » The requirement under the SFH law that the difference between the remaining average life of the cover pool assets and that of the covered bonds must not exceed 18 months (based only on assets up to 105% of covered bonds).

### Time subordination

After a CB anchor event, later-maturing covered bonds would be subject to time subordination. Principal cash collections may be used on a first-come, first-served basis, paying earlier-maturing covered bonds before later-maturing covered bonds. Such payments could result in the erosion of OC before any payments are made to later-paying covered bonds. However, this is mitigated by the following:

- » The legal minimum 5% OC requirement.
- » The contractual minimum committed OC of 5%.
- » Because of the nature of the corporate object of the issuer and the provisions of the SFH law, the likelihood of bankruptcy proceedings being commenced against the issuer appears relatively remote.

## Cover pool description

### Pool description as of 30 September 2024

As of 30 September 2024, the cover pool consisted almost entirely of French residential home loans backed by residential assets (96.3%) in France along with other supplementary assets (3.7%). All loans in the pool were secured by a guarantee from Crédit Logement (Aa3). For details on the sponsor bank's underwriting criteria, see "Appendix: Income underwriting and valuation."

As Exhibit below shows, all of the assets in the cover pool are residential home loans with total outstanding balance of around €4.49 billion. All the properties backing the loans are in France, with particular concentration in Île-de-France (48.1%). The weighted average unindexed loan-to-value (LTV) ratio of residential assets is 52.8%, and all the loans are performing. As of the cutoff date, the cover pool is well seasoned with a weighted average seasoning of 76 months.

On a nominal value basis, the cover pool assets total €4.66 billion, which back €3.50 billion in covered bonds, resulting in an OC level of 33.2% on a nominal value basis.



Exhibits below show more details about the cover pool characteristics.

## Residential mortgage loans

Exhibit 7

### Cover pool summary

| Overview                       |               | Specific Loan and Borrower characteristics                  |       |
|--------------------------------|---------------|---|-------|
| Asset type:                    | Residential   | Loans with an external guarantee in addition to a mortgage: | n/a   |
| Asset balance:                 | 4,490,880,416 | Interest only Loans   | 0.0%  |
| Average loan balance:          | 117,886       | Loans for second homes / Vacation:                          | 6.5%  |
| Number of loans:               | 38,095        | Buy to let loans / Non owner occupied properties:           | 12.6% |
| Number of borrowers:           | 29,796        | Limited income verified:                                    | n/d   |
| Number of properties:          | 38,491        | Adverse credit characteristics (**)                         | n/d   |
| WA remaining term (in months): | 137           |   |       |
| WA seasoning (in months):      | 76            | Performance   |       |
|                                |               | Loans in arrears ( ≥ 2months - < 6months):                  | 0.0%  |
|                                |               | Loans in arrears ( ≥ 6months - < 12months):                 | 0.0%  |
|                                |               | Loans in arrears ( ≥ 12months):                             | 0.0%  |
|                                |               | Loans in a foreclosure procedure:                           | 0.0%  |
| Details on LTV                 |               |   |       |
| WA unindexed LTV (*)           | 52.8%         |   |       |
| WA Indexed LTV:                | 40.3%         |   |       |
| Valuation type:                | Market Value  | Multi-Family Properties                                     |       |
| LTV threshold:                 | 80%           | Loans to tenants of tenant-owned Housing Cooperatives:      | n/a   |
| Junior ranks:                  | 0.0%          | Other type of Multi-Family loans (***)                      | n/a   |
| Loans with Prior Ranks:        | 0.0%          |   |       |

n/a: not available.

(\*) May be based on property value at the time of origination or further advance or borrower refinancing.

(\*\*) Typically borrowers with a previous personal bankruptcy or borrowers with a record of court claims against them at the time of origination.

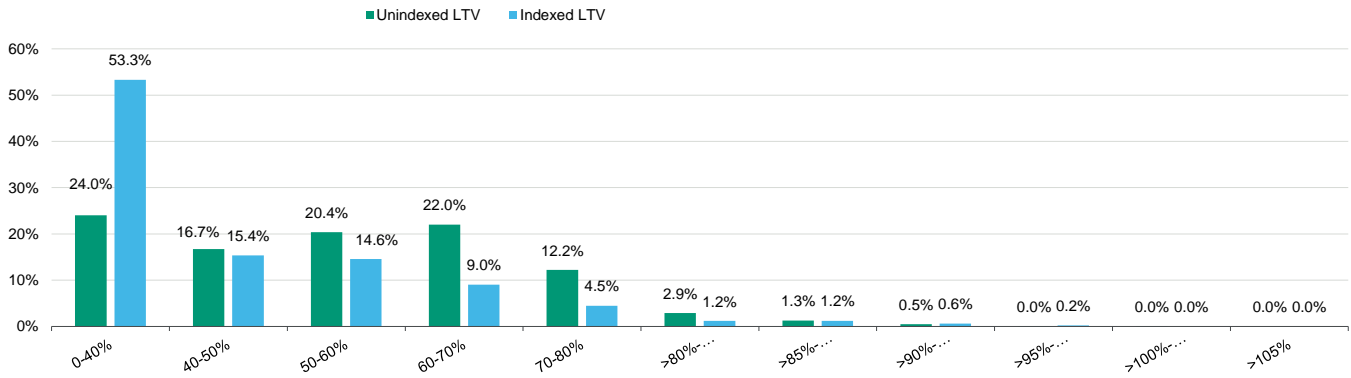
(\*\*\*) This "other" type refers to loans directly to Housing Cooperatives and to Landlords of Multi-Family properties (not included in Buy to Let).

Sources: Moody's Ratings and issuer data

Cover pool characteristics

Exhibit 8

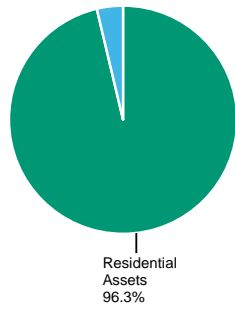
Balance per LTV band



Sources: Moody's Ratings and issuer data

Exhibit 9

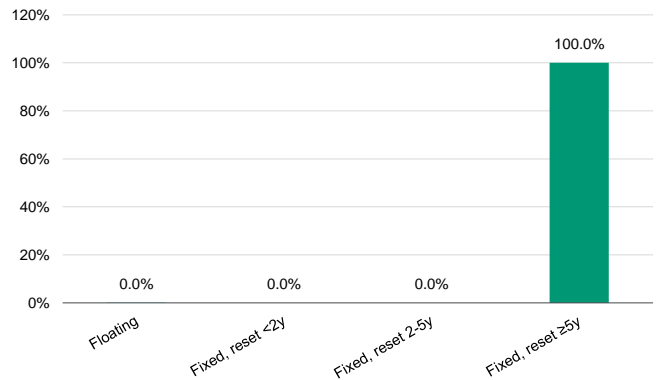
Percentage of residential assets



Sources: Moody's Ratings and issuer data

Exhibit 10

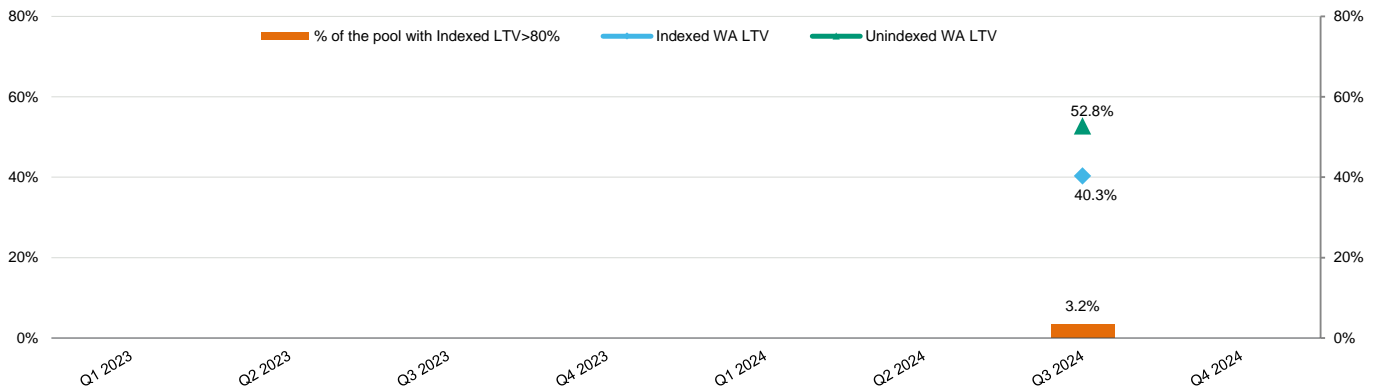
Interest rate type



Sources: Moody's Ratings and issuer data

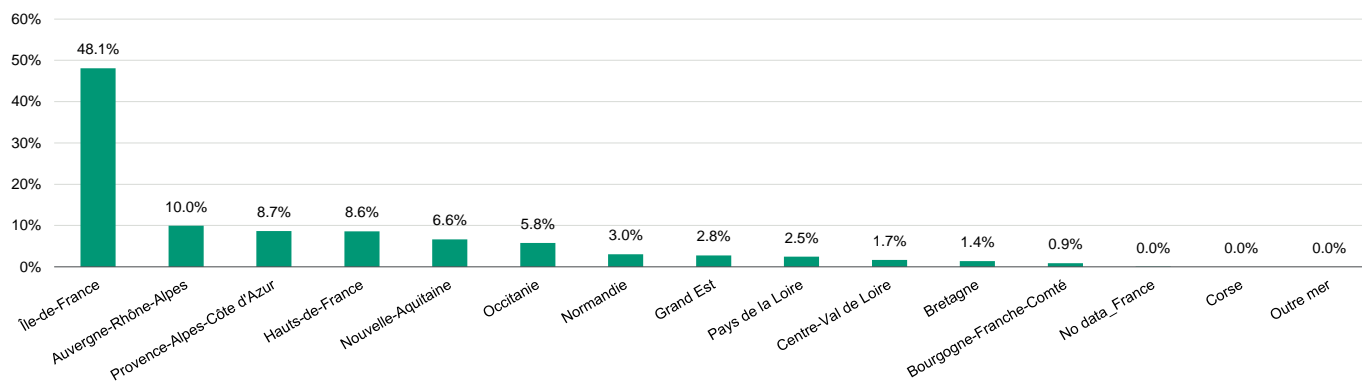
Exhibit 11

LTV



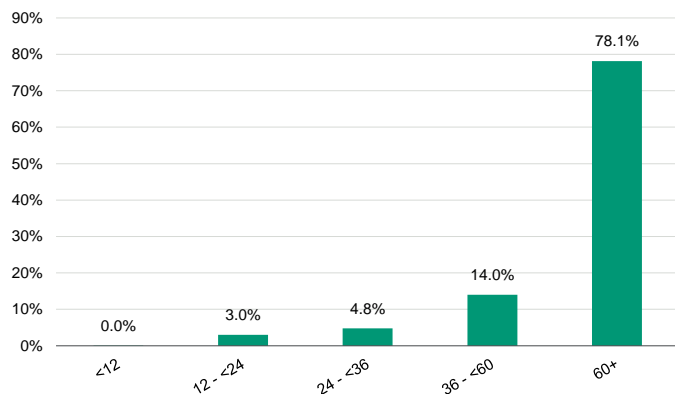
Sources: Moody's Ratings and issuer data

Exhibit 12

**Main country regional distribution**

Sources: Moody's Ratings and issuer data

Exhibit 13

**Seasoning (in months)**

Sources: Moody's Ratings and issuer data

**Cover pool monitor**

Pursuant to the French covered bond law, a cover pool monitor (*contrôleur spécifique*) has been appointed by the issuer. (See "[France - Legal Framework for Covered Bonds](#)")

**Cover pool analysis**

Our credit analysis of the pool takes into account specific characteristics of the pool, as well as legal risks.

**Primary cover pool analysis**

We calculate the collateral score for the cover pool using a scoring model to assess the credit risk for the residential assets in the cover pool. Our analysis takes into account, among other factors, the LTV ratios of the mortgage loans, the seasoning and the geographical distribution.

For this programme, the collateral score of the current pool is 2.0%, which is less than the average collateral score (5.4%) in other French mortgage covered bonds. (For details, see "[Moody's Global Covered Bonds Sector Update, Q3 2024](#)").

The "Home Loan Eligibility Criteria" include the following cumulative eligibility criteria:

- » Prior to the date upon which the relevant Home Loan has been made available to the borrower thereof, by satisfying all lending criteria and preconditions as applied by the originator of such relevant Home Loan pursuant, until the Transfer Effective Date, HBCE's customary lending procedures, and as from the Transfer Effective Date its customary lending procedures;
- » The purpose of the loan is either to buy, to renovate, to build or to refinance a residential real estate property;

- » The underlying property is located in France;
- » The home loan is governed by French law;
- » The home loan is denominated in Euro;
- » All sums due under the home loan (including interest and costs) are secured by a fully effective home loan security;
- » When the relevant Home Loan is guaranteed by a Home Loan Guarantee, the borrower is contractually prevented from constituting a Mortgage on the underlying property without the previous consent of the originator;
- » When the relevant Home Loan is guaranteed by a Home Loan Guarantee, on the date upon which it has been made available to the borrower thereof, the loan-to-income ratio (*taux d'effort*) of this borrower was not above thirty three per cent (33%);
- » At the relevant selection date, the remaining term for the home loan is less than thirty (30) years;
- » At the relevant selection date, the borrower under the home loan has paid at least one (1) instalment in respect of the home loan;
- » The borrower under the relevant Home Loan is either (i) an individual who is not an employee of the originator of such relevant Home Loan or (ii) a "SCI patrimoniale" (provided that the shareholders of such SCI shall only be individuals);
- » The home loan is current (i.e. does not present any arrears) as at the relevant selection date;
- » The home loan is either monthly or quarterly amortising as at the relevant selection date;
- » The borrower under the home loan does not benefit from a contractual right of set off;
- » The opening by the borrower under the home loan of a bank account dedicated to payments due under the home loan is not provided in the relevant contractual arrangements as a condition precedent to the originator of the home loan making the home loan available to the borrower under the home loan; and
- » Except where prior rating affirmation has been obtained, no amount drawn under the home loan is capable of being redrawn by the borrower thereof (i.e. the home loan is not flexible);
- » the relevant Home Loan complies with the requirements of the French SFH Legal Framework

From a credit perspective we view the following pool characteristics as credit positive:

- » All loans are amortizing on a regular basis with no bullet loans in the cover pool.
- » Majority of the home loans are secured on owner-occupied (71.5%) residential properties in France.
- » Both assets and liabilities are fixed rate entirely.
- » The high granularity of the pool in terms of debtor concentration.
- » The loans have an average seasoning of 76 months.
- » LTV of 52.8% on an Unindexed property value basis.
- » All the loans are performing.

From a credit perspective we view the following pool characteristics as credit negative:

- » There is geographical concentration with all assets in France with particular concentration in the Île-de-France region (48.1%) region of France.

### Additional cover pool analysis

#### Commingling risk

As a result of the cash management mechanisms, following the service by the issuer to the sponsor bank of a borrower enforcement notice and the transfer of title over the home loans to the issuer, the holders of the covered bonds will be exposed to the risk that (1) payments continue to be made to the collateral provider instead of being paid to the issuer directly; and (2) the collections standing to the credit of the collection accounts are not capable of being identified or are not transferred to the issuer in a timely manner. This may translate into a potential liquidity shortage or, if the collections have not been properly earmarked, into a credit issue. We believe that the above-mentioned risks are mitigated by the fact that, if the sponsor's Counterparty Risk Assessment falls below Baa2(cr), a reserve will be funded, based on the amount of collections received over the last two months prior to the trigger being breached.

#### Set-off risk

Set-off may be possible between the claim of a collateral provider (in its capacity as lender) under the home loan and a claim of its debtor vis-à-vis the relevant collateral provider. In addition to any contractual set-off that may be agreed between the parties, set-off may be imposed if (1) the conditions for legal set-off are met, or (2) the claims of the relevant parties are reciprocal and interrelated (*connexes*). With respect to interrelated debt, the most likely circumstances where set-off would have to be considered are when counterclaims resulting from a current account relationship will allow a debtor to set-off such counterclaims against sums due under a home loan. Some mitigants for this risk are as follows: (1) contractual set-off is excluded by an eligibility criteria that provides that no borrower benefits from a contractual right of set-off, (2) set-off risk between interrelated claims (*dettes connexes*) is partly mitigated by eligibility criteria stating that, the opening of a bank account dedicated to the payment must not be a condition precedent to the granting of a loan and (3) the cover pool consists of a granular pool of retail obligors with secured loans and a deposit insurance protects retail deposits in France.

## Comparables

Exhibit 14

## Comparables - CCF SFH – Mortgage Covered Bonds and other select French deals

| PROGRAMME NAME                                   | CCF SFH – Mortgage Covered Bonds  | MMB SCF – Mortgage Covered Bonds  | Societe Generale SFH - Mortgage Covered Bonds                                    | Arkea Home Loans SFH - Mortgage Covered Bonds                                    | BPCE SFH - Mortgage Covered Bonds  | Credit Agricole Home Loan SFH - Mortgage Covered Bonds                          |
|--|---|---|--|--|--|---|
| <b>Overview</b>                                  |   |   |  |  |  |   |
| Programme is under the law                       | SFH Law   | SCF Law   | SFH Law  | SFH Law  | SFH Law  | SFH Law   |
| Main country in which collateral is based        | France  | France  | France   | France   | France   | France  |
| Country in which issuer is based                 | France  | France  | France   | France   | France   | France  |
| Total outstanding liabilities                    | 3,500,000,000   | 2,400,000,000   | 43,640,000,000   | 9,732,500,000  | 48,071,500,000   | 41,496,147,898  |
| Total assets in the Cover Pool                   | 4,663,679,951   | 2,920,949,804   | 52,368,301,541   | 12,165,926,131   | 63,963,322,890   | 61,857,677,116  |
| Issuer name                                      | CCF SFH   | MMB SCF   | Societe Generale SFH   | Arkea Home Loans SFH   | BPCE SFH   | Credit Agricole Home Loan SFH   |
| Issuer CR assessment                             | n/a   | n/a   | n/a  | n/a  | n/a  | n/a   |
| Group or parent name                             | CCF   | My Money Bank   | Société Générale   | Credit Mutuel Arkea  | BPCE   | Crédit Agricole SA  |
| Group or parent CR assessment                    | A3(cr)  | Unpublished   | A1(cr)   | Aa2(cr)  | Aa3(cr)  | Aa2(cr)   |
| Main collateral type                             | Residential   | Residential   | Residential  | Residential  | Residential  | Residential   |
| Collateral types                                 | Residential 96.3%, Commercial 0%, Public Sector 0%, Other/Supplementary assets 3.7% | Residential 97.9%, Commercial 0%, Public Sector 0%, Other/Supplementary assets 2.1% | Residential 100%, Commercial 0%, Public Sector 0%, Other/Supplementary assets 0% | Residential 100%, Commercial 0%, Public Sector 0%, Other/Supplementary assets 0% | Residential 100%, Commercial 0%, Public Sector 0%, Other/Supplementary assets 0% | Residential 99%, Commercial 0%, Public Sector 0%, Other/Supplementary assets 1% |
| <b>Ratings</b>                                   |   |   |  |  |  |   |
| Covered bonds rating                             | Aaa   | Aaa   | Aaa  | Aaa  | Aaa  | Aaa   |
| Entity used in Moody's EL & TPI analysis         | CCF   | My Money Bank   | Societe Generale   | Credit Mutuel Arkea  | BPCE   | Credit Agricole S.A.  |
| CB anchor  | A2  | Unpublished   | Aa3  | Aa1  | Aa2  | Aa1   |
| CR Assessment                                    | A3(cr)  | Unpublished   | A1(cr)   | Aa2(cr)  | Aa3(cr)  | Aa2(cr)   |
| LT Deposit                                       | Baa2  | Unpublished   | A1   | Aa3  | A1   | Aa3   |
| Unsecured claim used for Moody's EL analysis     | Yes   | Yes   | Yes  | Yes  | Yes  | Yes   |
| <b>Value of Cover Pool</b>                       |   |   |  |  |  |   |
| Collateral Score                                 | 2.0%  | 4.0%  | 2.0%   | 3.6%   | 5.0%   | 3.5%  |
| Collateral Score excl. systemic risk             | n/a   | n/a   | 1.7%   | 3.0%   | n/a  | n/a   |
| Collateral Risk (Collateral Score post-haircut)  | 1.3%  | 2.7%  | 1.3%   | 2.4%   | 3.3%   | 2.3%  |
| Market Risk                                      | 15.0%   | 14.8%   | 12.7%  | 24.5%  | 13.3%  | 15.4%   |
| <b>Over-Collateralisation Levels</b>             |   |   |  |  |  |   |
| Committed OC*                                    | 5.0%  | 5.0%  | 8.5%   | 10.7%  | 8.1%   | 8.1%  |
| Current OC                                       | 33.2%   | 21.7%   | 20.0%  | 25.0%  | 33.1%  | 49.1%   |
| OC consistent with current rating                | 16.0%   | 15.5%   | 4.5%   | 0.0%   | 0.5%   | 0.0%  |
| Surplus OC                                       | 17.2%   | 6.2%  | 15.5%  | 25.0%  | 32.6%  | 49.1%   |
| <b>Timely Payment Indicator &amp; TPI Leeway</b> |   |   |  |  |  |   |
| TPI  | Probable-High   | Probable-High   | Probable-High  | Probable-High  | Probable-High  | Probable-High   |
| TPI Leeway                                       | 1   | Unpublished   | 3  | 5  | 4  | 5   |
| Reporting date                                   | 30 September 2024   | 30 September 2024   | 30 June 2024   | 30 June 2024   | 31 March 2024  | 30 June 2024  |

\*We consider this level of OC as committed according to our methodology even though the level of OC provided via the asset cover test might be higher because the issuer could reduce the level of OC down to this level without an impact on our covered bond rating.

Sources: Moody's Ratings and issuer data

## ESG considerations

We assess Environmental, Social and Governance (ESG) credit risks in our analysis based on general principles described in detail in the ESG cross-sector rating methodology available on moodys.com.

### Environmental considerations

Overall exposure to meaningful environmental credit risks is low in this programme.

- » In respect of physical risks to the cover pool,
  - the geographical diversification of the pool, the largest concentration being 48.1% in the Ile de France region.
- » In respect of regulatory risk, we expect that over time properties that do not meet climate-aligned standards for energy efficiency or carbon emissions will face regulatory sanctions and value impairment. However, we expect much of this risk to be gradually absorbed into the periodic updating of property valuations and income underwriting.

In the event of shocks in connection with regulation or physical hazards, the impact on property collateral will be partly mitigated by borrowers' liability to repay mortgage loans regardless of property value.

### Social considerations

Overall exposure to social factors is moderate for this programme. Misconduct, poor handling of data security and customer privacy breaches by lenders are the most significant social risks that may in due course affect the credit quality of the cover pool, although lenders' financial and operational flexibility and track record of adjusting to social issues may mitigate this. In addition, the diversified nature of the cover pool is a mitigant to exposure to social factors.

Social factors that potentially affect the cover pool have varied implications. Social risks can arise from changing demographic trends such as aging, urbanization, an increase in telecommuting and flight from cities, population declines or ways of living trends in general that impact the supply or demand for housing in particular areas, which can reduce home values. Societal and demographic trends will be relevant but typically develop over an extended timeframe that smooths out materiality for expected loss.

Social issues may also be driven also by a political agenda related to housing and consumer protection, particularly in down cycles, creating pressure on recovery values. Borrower-friendly legislation as a reaction to consumer activism can affect both the underwriting and the servicing of mortgage loans in the cover pool. Social policy-driven decisions in France, such as lowering underwriting standards at government-sponsored enterprises to increase homeownership, would reduce the credit quality of the cover pool.

### Governance considerations

Overall exposure to meaningful governance credit risks is low and similar to other covered bond programmes under French law.

The principal sources of governance for this programme are France's covered bond law; and the operational and substantive provisions of the programme documents. In this programme, there are control mechanisms in place that are designed to protect covered bondholders from mistakes, misallocation of cash flows and misappropriation of assets, and that promote compliance with the covered bond legal framework and operational and reporting requirements.

In particular, we note that (i) the sponsor bank is a regulated credit institution with experience and expertise in carrying out residential lending and servicing activities; (ii) the issuer is a regulated entity and maintains the cover pool on the issuer's group balance sheet, incentivising it to maximise cover pool value and aligning its interest with that of covered bond investors; (ii) the cover pool monitor has an independent role mandated and governed by the covered bond law and the cover pool monitor owes duties to bondholders; and the covered bond law (iii) ensures the bankruptcy remoteness of the cover pool; and (iv) contains detailed reporting requirements and sanctions for issuer noncompliance.

## Methodology and monitoring

The primary methodology we use in rating the issuer's covered bonds is "[Moody's Approach to Rating Covered Bonds](#)", published in October 2024. Other methodologies and factors that may have been considered in the rating process can also be found on <http://www.moody's.com>. In addition, we publish a weekly summary of structured finance credit, ratings and methodologies, available to all registered users of our website, at [www.moody's.com/SFQuickCheck](http://www.moody's.com/SFQuickCheck).

We expect the issuer to deliver certain performance data to us on an ongoing basis. In the event that this data is not made available to us, our ability to monitor the ratings may be impaired. This lack of data availability could negatively impact the ratings or, in some cases, our ability to continue to rate the covered bonds.



## Appendix: Income underwriting and valuation

Exhibit 15

| A. Residential Income Underwriting  |   |
|---|---|
| 1 Is income always checked?   | Yes   |
| 2 Does this check ever rely on income stated by borrower ("limited income verification") ?  | No - Income is verified against an independent verifiable source : tax Statement, payslip & bank statements.  |
| 3 Percentage of loans in Cover Pool that have limited income verification   | Not Applicable  |
| 4 If limited income verification loans are in the Cover Pool, describe what requirements lender has in place for these loans.   | Not Applicable  |
| 5 Does income in all cases constrain the amount lent (for example through some form of Income Sufficiency Test ("IST"))?  | -The income is the principal component of the assessment at origination and whether the customer can afford the loan. The components of the assessment are:<br>- the affordability ratio: the measure of credit charges and rental versus the revenue (after tax) to give a final %.<br>- HCSF regulation affordability: In France there is a specific regulation relating to the amount of lending a bank can provide with a higher level of affordability. The affordability calculation has the same principle of charges versus revenue however, some slight variations on the components included in the calculation with this using revenue gross of tax.<br>- Minimum disposable income levels - these are measured by taking the customer's total charges away from their total income to give the disposable income.   |
| 6 If not, what percentage of cases are exceptions.  | Not applicable - customer income is assessed in all applications.   |
| For the purpose of any IST:   |   |
| 7 Is it confirmed that income after tax is sufficient to cover both interest and principal?   | Yes - The affordability ratio does consider income after tax and compares it to charges (which does include interest and principal).  |
| 8 If so over what period is it assumed principal will be paid (typically on an annuity basis)? Any exceptions?  | Over 99% of the Home loans portfolio is repaid on a monthly installment basis. Quarterly or Annual frequency are possible for certain circumstances, however this requires the Risk function approval.  |
| 9 Does the age of the borrower constrain the period over which principal can be amortised?  | Loan Borrower insurance for Home loans is market practice and there are age limits for this at 75 or 85 depending on the policy. As the bank requires a borrower insurance for home loans the age of the borrower will be a constraint in certain circumstances.<br>Additionally, when the loan term extends beyond the customer's retirement age the potential retirement income is assessed with a stress applied.  |
| 10 Are any stresses made to interest rates when carrying out the IST? If so when and for what type of products?   | - Only fixed rate loans are currently offered. The fixed rate is for the lifetime of the loan. A stress on interest being paid by the borrower for these types of loans is not applicable.<br>- Variable or discounted loans are currently not offered by CCF.  |
| 11 Are all other debts of the borrower taken into account at the point the loan is made?  | Existing loan charges are taken into account in the affordability assessment.   |
| 12 How are living expenses of the borrower calculated? And what is the stated maximum percentage of income (or income multiple if relevant) that will be relied on to cover debt payments. (specify if income is pre or post tax) | See response on affordability assessment. The limits for these specific components are:<br>- HCSF Regulation: The regulation sets a limit on the level of lending with an affordability ratio above 35% - the threshold is 20% of home loan lending. As such the bank has eligibility criteria in place for lending above 35% : this includes income thresholds, savings, the type of property, existing or new customers. If the eligibility criteria is not met the application can only be approved by the branch network.<br>- Affordability Ratio: The max affordability ratio is 50%. Above this level only the Risk function can approve.<br>- Minimum Disposable income thresholds (depends on number of dependents & number of borrowers):<br>- 0 Dependents = 900€ Sole borrower / 1350€ two borrowers<br>- 1 Dependent = 1130€ Sole borrower / 1580€ two borrowers<br>- 2 Dependents = 1360€ Sole borrower / 1810€ two borrowers<br>- 3 Dependents = 1590€ Sole borrower / 2040€ two borrowers<br>- 4 or more Dependents = 1900€ Sole borrower / 2350€ two borrowers |
| Other comments  |   |

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**B. Residential Valuation**


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|   |  |
|---|--|
| 1 Are valuations based on market or lending values?   | <p>Generally, in the French market a professional valuation is not requested at origination. This is in part due to the use non-mortgage type securities, such as Credit Logement (CL), where the security for the bank is the guarantee of CL and the property value/security would be a consequence in the event of a rejected claim.</p> <p>- The bank policy, is that the purchase price is checked using an external desktop valuation and if there is a substantial difference, the rationale for this (extension, balcony etc) would be document and approved.</p>  |
| 2 Are all or the majority of valuations carried out by external valuers (with no direct ownership link to any company in the Sponsor Bank group)? | <p>When a professional valuation is required, an independent company is used.</p> <p>Below is a summary of the valuation approach by the bank:</p> <p>- At origination - An external desktop valuation is checked for all loans.</p> <p>- For loans above €3 millions a professional valuation is requested.</p> <p>- Professional valuations are also requested at certain trigger points during the lifetime of the mortgage secured loans (every 3 years for loans above €3 millions, very year once a loan is classified as NPL (if &gt;300k€)).</p> <p>- Additionally, index valuations are applied to the portfolio of mortgages on a quarterly basis.</p> |
| 3 How are valuations carried out where an external valuer not used?   | see responses above  |
| 4 What qualifications are external valuers required to have?  | Knowledge of the French market and certified.  |
| 5 What qualifications are internal valuers required to have?  | Knowledge of the French market and certified.  |
| 6 Do all external valuations include an internal inspection of a property?  | see responses above  |
| 7 What exceptions?  | see responses above  |
| 8 Do all internal valuations include an internal inspection of a property?  | see responses above  |
| 9 What exceptions?  | see responses above  |
| Other comments  |  |

Source: Issuer

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