

«БАНК ЦЕНТРКРЕДИТ» АКЦИОНЕРЛІК КОГАМЫ

АКЦИОНЕРНОЕ ОБЩЕСТВО «БАНК ЦЕНТРКРЕДИТ»

JOINT STOCK COMPANY «BANK CENTERCREDIT»

No 22-3/93 28 08 2018 F

АО «КАЗАХСТАНСКАЯ ФОНДОВАЯ БИРЖА»

monitoring@kase.kz

В соответствии с листинговыми правидами **АО «Банк ЦентрКредит»** предоставляет информацию <u>по состоянию на 28.08.2018 г.</u>:

1) о кредитных рейтингах агентства S&P Global Ratings, подтвержденных Банку ЦентрКредит:

Наименование рейтинга	Рейтинг	дата подтверж дения
Долгосрочный кредитный рейтинг эмитента Long-term issuer credit rating	В	27.08.2018
Краткосрочный кредитный рейтинг эмитента Short-term issuer credit rating	В	27.08.2018
Долгосрочный рейтинг по национальной шкале National scale long-term credit rating	kzBBB-	27.08.2018
Прогноз/Outlook	Стабильный	27.08.2018

Приложение: Рейтинговый отчет агентства S&P Global Ratings от 27.08.2018 г. о подтверждении рейтингов Банка ЦентрКредит на английском языке на 11 стр.

'Bank CenterCredit' JSC, 38 Al Farabi Ave., 050059, Almaty, Kazakhstan, Tel. + 7 727 – 2598 598, Fax + 7 727 – 2598 622, E-mail: info@bcc.kz, SWIFT: KCJBKZKX, www.bcc.kz

С уважением,

Дпректор казначейства

Т. Габасов

11en. Мейрамбек Каражигитов, Отдел финансовых институтов, Департамент казначейства тел. +7727-2598546, Meirambek.karazhigitor@bcc.kz

Mayeel Out



Research

Bank CenterCredit JSC

Primary Credit Analyst:

Ekaterina Tolstova, Moscow (7) 495-783-41-18; ekaterina tolstova@spglobal.com

Secondary Contacts:

Annette Ess, CFA, Frankfurt (49) 69-33-999-157; annette.ess@spglobal.com Irina Velieva, Moscow (7) 495-783-40-71; irina.velieva@spglobal.com

Table Of Contents

Major Rating Factors

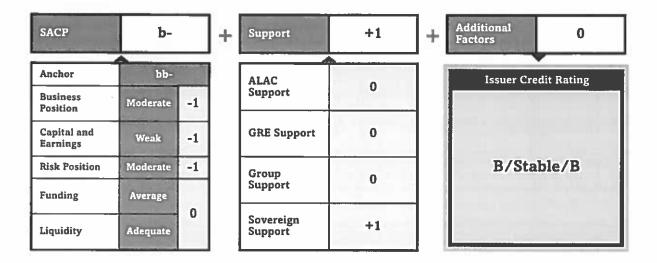
Outlook

Rationale

Related Criteria

2091295

Bank CenterCredit JSC



Major Rating Factors

Strengths: Weaknesses:

- Midsize franchise in Kazakhstan and the seventh largest bank by assets.
- Moderate systemic importance due to a decent market share in retail deposits, resulting in a moderate likelihood of extraordinary government support.
- Weak capitalization as measured by our risk-adjusted capital (RAC) ratio.
- Weak profitability, negatively affected by a low interest margin and high provisioning expenses.
- Higher exposure to the real estate and construction sectors than global peers.

Outlook: Stable

The stable outlook on Bank CenterCredit (BCC) reflects S&P Global Ratings' expectation that BCC's business and financial profiles will remain broadly unchanged over the next 12 months.

We could take a negative rating action in the next 12 months if we see a significant decline in the bank's capitalization, with its RAC ratio dropping below 3%, or if we see material deterioration in asset quality indicators as a result of the bank's large stock of restructured loans.

A positive rating action appears remote in the next 12 months but could follow unexpected significant strengthening of the bank's capitalization through a capital injection, or material strengthening of its profitability.

Rationale

Our ratings on BCC are lower than the 'bb-' anchor for commercial banks operating in Kazakhstan. The bank's stand-alone credit profile (SACP) of 'b-', reflects our belief that its weak capitalization due to the lack of shareholder Tier 1 capital injections, a poor track record of profitability in the past seven years, a high volume of nonperforming loans (NPLs; over 90 days overdue) compared with international peers, and sizable single-name, construction, and real estate sector lending concentrations, are unlikely to improve materially in the next 24 months. We view the bank's funding and liquidity metrics as in line with the Kazakh banking system average. We view the bank as of moderate systemic importance for the Kazakh banking sector due to its market position as the seventh largest bank in Kazakhstan, with a decent market share in retail deposits and residential mortgages. Therefore, our long-term issuer credit rating on BCC is one notch higher than the bank's SACP, reflecting our belief that it would likely receive support from the government if required.

Anchor:

We use our Banking Industry Country Risk Assessment (BICRA) economic risk and industry risk scores to determine a bank's anchor, the starting point in assigning an issuer credit rating. Our anchor for a commercial bank operating only in Kazakhstan is 'bb-'.

In our view, economic risks remain elevated in Kazakhstan because the commodity-dependent economy is still exposed to trade volatility. For 2018-2019, we expect economic growth to average 3%, supported by the government's infrastructure programs and rising oil production, and steady private consumption and a sound export performance. Extremely high credit risk remains a key weakness for Kazakh banks, in our view. Provisions under International Financial Reporting Standards (IFRS) cover only about one-half of our estimate of NPLs and restructured loans at the system level, which we project at about 25%-30% in 2018. The negative trend for economic risk reflects the repercussions of the prolonged correction phase on the banking sector started in 2011. We expect credit losses will normalize to about 2.0%-2.5% in 2018, following the spike of 7.7% in 2017, largely pointing to Kazakh banks' inability to absorb higher credit losses without additional government support.

Banking industry risks are also high. We believe Kazakhstan's banking regulators lack independence and could be subject to political interference. They are also prone to regulatory forbearance policies. Generating sufficient risk-adjusted returns over a cycle will remain difficult for most banks, owing to narrowed margins and elevated credit and funding costs. We expect market consolidation over the next few years, reflecting the exit of those small banks that have difficulty attracting market funding and liquidity, and that would face a capital shortfall if they were to adequately provision their problem loans. We expect Kazakhstani tenge liquidity across the system overall will remain sufficient in 2018, but will favor larger more creditworthy banks. The industry risk trend is stable.

Table 1

Bank CenterCredit JSC Key Figures							
			Year-end	ed Dec. 31			
(Mil. KZT)	2018*	2017	2016	2015	2014		
Adjusted assets	1,405,936.0	1,325,505.0	1,359,430.0	1,439,811.0	1,104,505.0		
Customer loans (gross)	952,801.0	930,656.0	889.209.0	1,039,441.0	971,931.0		

WWW.STANDARDANDPOORS.COM

Table 1

			Year-ende	d Dec. 31	
(Mil. KZT)	2018*	2017	2016	2015	2014
Adjusted common equity	98,288.0	124,820 0	98,383.0	86,322.0	84,927.0
Operating revenues	35,434.0	73,346.0	50,660 0	64,214.0	72,286.0
Noninterest expenses	13,657.0	25,158.0	30,732.0	28,090.0	26,142.0
Core earnings	5,125.0	3,105.7	7.236.4	4.049.1	967.0

^{*}Data as of June 30.

KZT-KZT-Kazakhstani tenge

Business position: Expected continuation of strategy following rollercoaster changes in ownership Our assessment of BCC's business position balances the bank's decent market share (6% of the system's retail deposits as of July 1, 2018) and its track record of very low profitability over the past 10 years.

We see the recent change in the bank's ownership as neutral for the future development of its business and strategy. In March 2018, Tsesnabank and Financial Holding Tsesna sold their respective 27.96% and 13.42% stakes in BCC, which they acquired about a year earlier from Kookmin Bank and International Finance Corporation. As a result, BCC's long-standing owner Mr. Baiseitov's stake increased to 38.73%, and the bank's former CEO's Vladislav Lee's to 8.09% as of July 1, 2018. The rest of the shares are held by minority shareholders.

We believe BCC is well positioned to implement its strategy, with a focus on new business generation in order to increase its market share in the small and midsize enterprise (SME) and retail segments, to maintain its market share in the corporate segment, and to improve its profitability. BCC benefits from a more favorable diversification of risks and returns than other medium-sized banks in Kazakhstan, which are heavily skewed toward corporate or retail customers. As of mid-2018, retail loans accounted for about 39% of BCC's loan book and SME loans about 5%, the rest being corporate loans. Deposits are almost equally split between retail and corporate customers.

Table 2

Bank CenterCredit JSC Business Position							
•			Year-ended Dec. 31				
(%)	2018*	2017	2016	2015	2014		
Total revenues from business line (currency in millions)	35,434.0	108,339.0	52,628.0	64,214.0	72,286.0		
Commercial banking/total revenues from business line	N/A	70.6	42.2	(14.8)	62.6		
Retail banking/total revenues from business line	N/A	20.5	36.8	(2.0)	42.9		
Return on average equity	7.3	25.3	5.8	2.2	1.2		

^{*}Data as of June 30.

N/A-Not applicable.

Capital and earnings: Weak capitalization and profitability are likely to remain

We expect BCC's capital and earnings will remain a negative rating factor because we believe its earnings are insufficient to rebuild historically low capital levels and provide sufficient loss absorption capacity if loan portfolio quality deteriorates.

The bank's RAC ratio reached 5.3% at year-end 2017 compared with 4.4% at year-end 2016, due to a significant one-off capital gain. The 2017 result was underpinned by subordinated debt of Kazakhstani tenge (KZT) 60 billion (about \$180 million) provided by the National Bank of Kazakhstan for 15 years to BCC and four other large Kazakh banks as part of the program to increase the financial stability of the Kazakh banking sector. As a result, in 2017 the bank's total adjusted capital was boosted by a KZT35 billion one-off capital gain through its profit and loss account. However, we believe the IFRS 9 provisions incurred by BCC in the first quarter of 2018 diluted this capital gain, and therefore project the RAC ratio will stay about 4.0%-4.5% in the next 12-18 months. In addition, any downward movement in interest rates in Kazakhstan could reduce these capital gains and introduce some volatility in the bank's total adjusted capital.

Our forecast RAC ratio for BCC in 2018-2019 is based on the following assumptions:

- Annual loans growth of 3%-5%, in line with peers.
- · KZT5.9 billion injection of common equity from shareholders in 2019 and no dividends.
- · Net interest margin of about 3.7%, which is at the peer average.
- · Cost of risk of about 2.5%-3.5%, in line with the system average.
- IFRS provisions of KZT20.3 billion in the first quarter of 2018.
- · Return on assets of about 0.5%-0.7%, below the system average.

BCC currently meets all regulatory requirements for capital adequacy and reported a Tier 1 ratio of 7.9% and a total capital adequacy ratio of 16.4% under local regulatory standards at July 1, 2018, compared with required minimums of 7.5% and 10% (including countercyclical buffer). However, we consider the bank's quality of regulatory capital to be rather weak because it includes a large amount of subordinated debt and capital gain, and is not sufficient to withstand significant deterioration in the loan portfolio's quality.

We believe that the bank's earnings capacity will remain moderate due to onerous provisioning expenses, although it has a positive earnings buffer, indicating that it could generate sufficient preprovisioning income to absorb a marked cyclical spike in credit losses.

Table 3

		Y	Year-ended Dec. 31					
(%)	2018*	2017	2016	2015	2014			
Tier 1 capital ratio	N/A	13.3	10.0	8.0	9.4			
Adjusted common equity/total adjusted capital	100.0	100.0	100.0	100.0	100.0			
Net interest income/operating revenues	51.1	64.8	52.0	70.2	64.2			
Fee income/operating revenues	27.1	25.8	36.2	29.0	27.6			
Market-sensitive income/operating revenues	11.5	8.9	10.3	0.3	8.1			
Noninterest expenses/operating revenues	38.5	34.3	60.7	43.7	36.2			
Preprovision operating income/average assets	3.2	3.6	1.4	2.8	4.2			

Table 3

Bank CenterCredit JSC Capital And Earnings (cont.)						
		Y	d Dec. 31-			
(%)	2018*	2017	2016	2015	2014	
Core earnings/average managed assets	0.8	0.2	0.5	0.3	0:1	

^{*}Data as of June 30.

N/A-Not applicable.

Table 4

			Average S&P Global Ratings' RW
(Mil. KZT)	Exposure*	S&P Global Ratings' RWA	(%)
Credit risk			
Government and central banks	265,463 0	59,090.0	22.3
- 4			
Institutions and CCPs	40,320.0	30,672,1	76.1
Corporate	703,255.0	1,275,829.7	181.4
Retail	297,499 0	394,941.2	132.8
Of which mortgage	132,217.0	122,287.5	92.5
Securitization§	0.0	0.0	0.0
Other assets†	159,479 5	389,465 8	244 2
Total credit risk	1,466,016.5	2,149,998 7	146.7
Market risk			
Equity in the banking book	810.0	8,183.8	1,010.3
Trading book market risk	-	100	-
Total market risk		8,183.8	
Operational risk			-
Total operational risk		203,135.6	
(Mil. KZT)		S&P Global Ratings' RWA	% of S&P Ratings' Global RWA
RWA before diversification		2,361,318	100
(Mil. KZT)			S&P Global Ratings' RAC ratio
	<u> </u>	Total adjusted capital	(%)
Capital ratio			
Capital ratio before adjustments		124,820.0	5,3

^{*}Exposure at default. §Securitization exposure includes the securitization tranches deducted from capital in the regulatory framework. †Other assets includes Deferred Tax Assets (DTAs) not deducted from ACE. ‡Adjustments to Tier 1 ratio are additional regulatory requirements (e.g. transitional floor or Pillar 2 add-ons). RWA--Risk-weighted assets. RW--Risk weight. RAC--Risk-adjusted capital.KZT--Kazakhstran Tenge. Sources: Company data as of Dec. 31, 2017, S&P Global Ratings.

Risk position: Positive track record of reducing legacy NPLs through write offs and recoveries to continue

We expect gradual improvement in the bank's asset quality indicators through recoveries and write-offs of legacy problem loans. BCC's problem loans are currently at the Kazakhstan banking system average, but significantly above the level of medium-sized banks in peer countries with similar level of economic risk as in Kazakhstan, such as in

WWW.STANDARDANDPOORS.COM

Russia, Georgia, and Bulgaria. Problem loans relate mostly to legacy problem loans generated before 2008. According to consolidated accounts prepared under IFRS, BCC's NPLs decreased to 9.9% as of mid 2018 from 14.6% two years earlier. Restructured loans accounted for an additional 17% of total loans as of year-end 2017, which is in line with that of domestic peers.

We view BCC's provision coverage of NPLs and restructured loans as only moderate, at 53% as of March 31, 2018 and do not expect it will improve substantially in 2018 because the bank's pre-provision earnings are not high enough to create more reserves, which is a risk in the event that one of the bank's largest exposures deteriorates.

Our view of BCC's risk position also reflects the bank's sizable single-name and sector lending concentrations in a global comparison that are in line with the system average. We believe that BCC's exposure to real estate and construction, at 30% of the total loan book on March 31, 2018, and is unlikely to increase materially over the next two years as most of the exposures date back to pre-2009. Of this exposure, 16% relates to the lower-risk retail mortgage portfolio and 14% to higher-risk commercial and residential construction and real estate related loans. The real estate and construction sector performed poorly in Kazakhstan during the 2007-2008 financial crisis and was one of the major factors behind the system's nonperforming assets. The recovery process is lengthy and prospects are uncertain because real estate prices still remain below their 2007 peak.

Individual loan concentrations at BCC are somewhat lower than peers', with the top-20 exposures accounting for 2.4x total-adjusted capital at March 31, 2018. We consider this to be high, however, in a global context.

Table 5

Bank CenterCredit JSC Risk Position						
	Y	ear-ende	d Dec. :	31		
2018*	2017	2016	2015	2014		
4.8	4.7	(14.5)	6.9	(0.1)		
14.4	10.7	13.8	16.7	13.0		
2.9	4.8	1.1	2.8	4.5		
9.1	0.2	6.0	4.1	9.2		
9.9	10.5	11.7	17.1	15.6		
100.6	116.9	90.1	85.0	98.1		
	4.8 14.4 2.9 9.1 9.9	2018* 2017 4.8 4.7 14.4 10.7 2.9 4.8 9.1 0.2 9.9 10.5	2018* 2017 2016 4.8 4.7 (14.5) 14.4 10.7 13.8 2.9 4.8 1.1 9.1 0.2 6.0 9.9 10.5 11.7	4.8 4.7 (14.5) 6.9 14.4 10.7 13.8 16.7 2.9 4.8 1.1 2.8 9.1 0.2 6.0 4.1 9.9 10.5 11.7 17.1		

^{*}Data as of June 30.

Funding and liquidity: Profile in line with that of domestic peers

We consider BCC's funding to be a neutral rating factor. It is comparable to that of other Kazakh banks, reflecting funding by retail and corporate customer deposits complemented by local senior unsecured bonds and subordinated debt. The bank's average stable funding ratio over the past five years of 122% (as calculated by S&P Global Ratings) supports this assessment.

Customer deposits represented the largest funding source (81% of total liabilities), in line with other midsize Kazakh banks as of mid 2018. About half of total deposits were retail deposits a higher share than for domestic peers. Although retail deposits are more expensive, higher dollarized, and more confidence sensitive than corporate deposits in Kazakhstan, we view a balanced profile of retail and corporate deposits as positive for funding diversification. We view

BCC's deposit stability as at the system average. We do not expect any significant deposits outflows over the next 12 months in view of BCC's strong brand name and established franchise.

BCC's depositor concentration is adequate, in our view, with the top-20 depositors accounting for about 19% of total deposits at year-end 2017, comparing very favorably with the bank's peers due to a higher share of retail depositors. In line with other midsized Kazakh banks, deposits from state-related companies, pension funds, and high-net-worth individuals, account for the majority of the top-20 deposits. We consider them to be relatively stable and highly dependent on the rating level, which is higher for BCC than for smaller Kazakh banks.

We view BCC's liquidity position as adequate, reflecting its adequate share of broad liquid assets, covering wholesale debt maturing in the next 12 months by 4.6x as of mid 2108. In addition, broad liquid assets covered about one-third of all customer deposits, which compares positively to deposit outflows of 7% in 2017. As a bank of moderate systemic importance, we believe that BCC is likely to expeditiously receive a short-term liquidity line from the National Bank of Kazakhstan, in the case of unplanned funds outflows.

Table 6

Bank CenterCredit JSC Funding And Liquidity							
	-	Year-ended Dec. 31					
(%)	2018*	2017	2016	2015	2014		
Core deposits/funding base	80.7	83.5	84.7	77.9	79_0		
Customer loans (net)/customer deposits	83 8	83.8	75.6	85.7	103.0		
Long term funding ratio	94.7	95.7	97.4	90.8	92.4		
Stable funding ratio	123.3	124.6	137.4	126.5	110.7		
Short-term wholesale funding/funding base	5.7	4.7	2.8	9.7	8.2		
Broad liquid assets/short-term wholesale funding (x)	4 6	5 8	10.6	2 6	2 3		
Net broad liquid assets/short-term customer deposits	36.8	39.6	47.9	26.0	15.3		
Short-term wholesale funding/total wholesale funding	29.5	28.7	18.5	44.0	39,1		
Narrow liquid assets/3-month wholesale funding (x)	6.5	8.3	48.0	5.0	3.6		

^{*}Data as of June 30.

Support: Moderate systemic importance resulting in one notch of support

Given BCC's market position as the seventh-largest Kazakh bank by assets and its sizable market share in lending and retail deposits, we consider the bank to have moderate systemic importance for the Kazakhstan banking sector and economy. We believe it would likely receive extraordinary support from the government if required. Accordingly, the issuer credit rating is one notch higher than the stand-alone credit profile, reflecting potential extraordinary government support.

Related Criteria

- General Criteria: Methodology For National And Regional Scale Credit Ratings, June 25, 2018
- Criteria Financial Institutions General: Risk-Adjusted Capital Framework Methodology, July 20, 2017
- General Criteria: Methodology For Linking Long-Term And Short-Term Ratings, April 7, 2017

- Criteria Financial Institutions Banks: Bank Hybrid Capital And Nondeferrable Subordinated Debt Methodology And Assumptions, Jan. 29, 2015
- · General Criteria: Group Rating Methodology, Nov. 19, 2013
- Criteria Financial Institutions Banks: Quantitative Metrics For Rating Banks Globally: Methodology And Assumptions, July 17, 2013
- · Criteria Financial Institutions Banks: Banks: Rating Methodology And Assumptions, Nov. 9, 2011
- Criteria Financial Institutions Banks: Banking Industry Country Risk Assessment Methodology And Assumptions, Nov. 9, 2011
- · General Criteria: Use Of CreditWatch And Outlooks, Sept. 14, 2009

Anchor Matrix										
Industry					Econon	nie Risk				
Risk	1	2	3	4	5	6	7	8	9	10
1	a	a	a-	bbb+	bbb+	bbb		- 5		
2	a	a-	a-	bbb+	bbb	bbb	bbb-	*	1.9	- 6
3	a-	a-	bbb+	bbb+	bbb	bbb-	bbb-	bb+	92	25
4	bbb+	bbb+	bbb+	bbb	bbb	bbb-	bb+	bb	bb	85
5	bbb+	bbb	bbb	bbb	bbb-	bbb-	bb+	bb	bb-	b+
6	bbb	bbb	bbb-	bbb-	bbb-	bb+	bb	bb	bb-	b+
7	-	bbb-	bbb-	bb+	bb+	bb	bb	bb-	b+	b+
8			bb+	bb	bb	bb	bb-	bb-	b+	b
9	-	-	-	bb	bb-	bb-	b+	b+	b+	b
10	-	-	-	-	b+	b+	b+	b	b	b-

Ratings Detail (As Of August 27, 2018)	
Bank CenterCredit JSC	
Issuer Credit Rating	B/Stable/B
Kazakhstan National Scale	kzBBB-//
Issuer Credit Ratings History	
28-Oct-2015	B/Stable/B
29-Dec-2011	B+/Stable/B
20-Jul-2018 Kazakhstan National Scale	kzBBB-//-
28-Oct-2015	kzBB+//
29-Dec-2011	kzBBB//
Sovereign Rating	
Każakhstan	BBB-/Stable/A-3
Kazakhstan National Scale	kzAAA//

^{*}Unless otherwise noted, all ratings in this report are global scale ratings. S&P Global Ratings' credit ratings on the global scale are comparable across countries. S&P Global Ratings' credit ratings on a national scale are relative to obligors or obligations within that specific country, Issue and debt ratings could include debt guaranteed by another entity, and rated debt that an entity guarantees.

WWW.STANDARDANDPOORS.COM

Copyright © 2018 Standard & Poor's Financial Services LLC. All rights reserved.

No content (including ratings, credit-related analyses and data, valuations, model, software or other application or output therefrom) or any part thereof (Content) may be modified, reverse engineered, reproduced or distributed in any form by any means, or stored in a database or retrieval system, without the prior written permission of Standard & Poor's Financial Services LLC or its affiliates (collectively, S&P). The Content shall not be used for any unlawful or unauthorized purposes. S&P and any third-party providers, as well as their directors, officers, shareholders, employees or agents (collectively S&P Parties) do not guarantee the accuracy, completeness, timeliness or availability of the Content. S&P Parties are not responsible for any errors or omissions (negligent or otherwise), regardless of the cause, for the results obtained from the use of the Content, or for the security or maintenance of any data input by the user. The Content is provided on an "as is" basis. S&P PARTIES DISCLAIM ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE OR HARDWARE CONFIGURATION. In no event shall S&P Parties be liable to any party for any direct, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs or losses caused by negligence) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related and other analyses, including ratings, and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. S&P's opinions, analyses and rating acknowledgment decisions (described below) are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P assumes no obligation to update the Content following publication in any form or format. The Content should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. S&P does not act as a fiduciary or an investment advisor except where registered as such. While S&P has obtained information from sources it believes to be reliable, S&P does not perform an audit and undertakes no duty of due diligence or independent verification of any information it receives. Rating-related publications may be published for a variety of reasons that are not necessarily dependent on action by rating committees, including, but not limited to, the publication of a periodic update on a credit rating and related analyses.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P reserves the right to assign, withdraw or suspend such acknowledgment at any time and in its sole discretion. S&P Parties disclaim any duty whatsoever arising out of the assignment, withdrawal or suspension of an acknowledgment as well as any liability for any damage alleged to have been suffered on account thereof.

S&P keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of S&P may have information that is not available to other S&P business units. S&P has established policies and procedures to maintain the confidentiality of certain non-public information received in connection with each analytical process.

S&P may receive compensation for its ratings and certain credit-related analyses, normally from issuers or underwriters of securities or from obligors. S&P reserves the right to disseminate its opinions and analyses. S&P's public ratings and analyses are made available on its Web sites, www.standardandpoors.com (free of charge), and www.ratingsdirect.com and www.globalcreditportal.com (subscription), and may be distributed through other means, including via S&P publications and third-party redistributors. Additional information about our ratings fees is available at www.standardandpoors.com/usratingsfees.