

ASSESSMENT

10 May 2024



Contacts

Atsushi Goto
 Sustainable Finance Analyst
 Moody's Japan K.K.
 atsushi.goto@moodys.com

Manon Inomata
 Sustainable Finance Associate
 Moody's Japan K.K.
 manon.inomata@moodys.com

Jeffrey Lee
 VP-Sustainable Finance
 sukjoonjeffrey.lee@moodys.com

Mitsui Fudosan Co., Ltd.

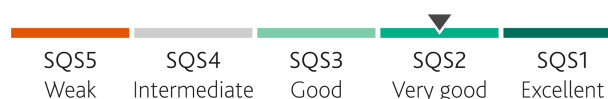
Second Party Opinion – Sustainability-linked Finance Framework Assigned SQS2 Sustainability Quality Score

Summary

We have assigned an SQS2 sustainability quality score (very good) to Mitsui Fudosan Co., Ltd.'s sustainability-linked finance framework dated April 2024. The company has established its framework to issue sustainability-linked instruments to finance general corporate purposes and selected three sustainability related KPIs. The framework is aligned with the five core components of the International Capital Market Association's (ICMA) Sustainability-Linked Bond Principles (SLBP) 2023, and the Loan Market Association, the Asia Pacific Loan Market Association and the Loan Syndications & Trading Association's (LMA/APLMA/LSTA) Sustainability-Linked Loan Principles (SLLP) 2023. The framework demonstrates a significant contribution to sustainability. In addition, the framework is aligned with the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 and Sustainability-Linked Loan Guidelines 2022.

Sustainability quality score

SQS2



Alignment with principles SUSTAINABILITY-LINKED

Overall alignment



FACTORS	ALIGNMENT
Selection of KPIs	Aligned
Calibration of SPTs	Aligned
Instrument characteristics	Aligned
Reporting	Aligned
Verification	Aligned

Contribution to sustainability

Overall contribution



Expected impact Relevance and magnitude	High
ADJUSTMENTS	
ESG risk management	No adjustment
Coherence	No adjustment

POINT-IN-TIME-ASSESSMENT

Scope

We have provided a Second Party Opinion (SPO) on the sustainability credentials of Mitsui Fudosan's sustainability-linked finance framework, including the framework's alignment with the ICMA's SLBP 2023 and LMA/APLMA/LSTA's SLLP 2023. The company has selected three sustainability KPIs for the potential issuance of sustainability-linked bonds and loans — in the areas of scope 1 and 2 emission reduction (KPI 1-1); scope 1, 2 and 3 emission reduction (KPI 1-2); and the percentage of green building certification obtained (KPI 2), as outlined in Appendix 2 of this report. We have also provided a supplementary opinion on the framework's alignment with the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 and Sustainability-Linked Loan Guidelines 2022. We performed a full review in the context of the guidelines, covering all four components. The assessment is solely based on information provided or confirmed by the issuer. Our supplementary opinion does not constitute a verification, certification or audit, is distinct from the Alignment with Principles Score and has no influence on the expressed Sustainability Quality Score.

Our assessment is based on the last updated version of the framework received on 15 April 2024, and our opinion reflects our point-in-time assessment¹ of the details contained in this version of the framework, as well as other public and non-public information provided by the company.

We produced this SPO based on our [Framework to Provide Second Party Opinions on Sustainable Debt](#), published in October 2022.

Issuer profile

Headquartered in Tokyo, [Mitsui Fudosan Co., Ltd.](#) (Mitsui Fudosan) is the largest integrated real estate company in Japan. The company's total consolidated assets amounted to around ¥9.4 trillion and revenue from operations was around ¥2.3 trillion for fiscal year ended March 2024. The company has diverse operations across the real estate business, where around 34% of its revenue is from leasing, 26% from property sales, 20% from asset management, 8% from facility operations and 12% from other segments. The company has its operations in Japan and overseas, including APAC, North America and Europe.

The key sustainability issues, as identified by Mitsui Fudosan, include the improvement of the environmental performance of its new and existing properties, reduction of CO₂ emissions during the construction phase, and water and waste management. The company has established a groupwide comprehensive sustainability strategy to address key issues and achieve net zero by 2050.

Strengths

- » KPI 1-1 and KPI 1-2 are aligned with the 1.5 degree pathway, adopting the most stringent sector standard.
- » All three sustainability performance targets (SPTs) demonstrate a significant improvement over the historical trend.

Challenges

- » KPI 2 does not include the list and the level of green building certification associated with the SPT, suggesting that the expected sustainable performance of the buildings may be low.

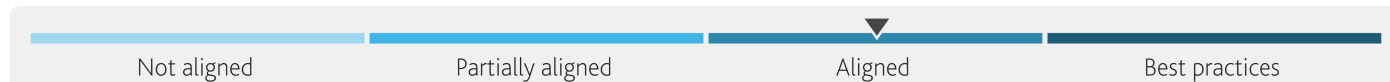
This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the issuer/deal page on <https://ratings.moody's.com> for the most updated credit rating action information and rating history.

Alignment with principles

Mitsui Fudosan's sustainability-linked finance framework is aligned with five core components of the ICMA's SLBP 2023 and the LMA/APLMA/LSTA's SLLP 2023. Additionally, the framework is aligned with the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 and Sustainability-Linked Loan Guidelines 2022:

- Green Bond Principles (GBP)
- Social Bond Principles (SBP)
- Green Loan Principles (GLP)
- Social Loan Principles (SLP)
- Sustainability-Linked Bond Principles (SLBP)
- Sustainability Linked Loan Principles (SLLP)

Selection of key performance indicators



Definition – ALIGNED

Mitsui Fudosan has clearly defined the characteristics of the KPIs, including the units of measurement, rationale, calculation methodologies and scope. The details are publicly disclosed in the framework. The company has selected KPIs around scope 1 and 2 (KPI 1-1), scope 1, 2 and 3 (KPI 1-2), and the percentage of green building certifications obtained (KPI 2).

Measurability, verifiability and benchmark – ALIGNED

The KPIs selected are measurable and externally verifiable. While the calculation methodologies can change, the company commits to informing investors in case of any further changes. The historical data of the embodied carbon emissions relies on the emission factor by the Ministry of Environment in Japan, whereas the company communicated that it will use the actual data to measure the performance of KPI 1-2. In case of a change in calculation methodology, the external verifier will assess the consistency with the initial level of ambition. The definition of KPIs relies on external references, allowing the KPIs to be benchmarked. While the historical data for KPIs is disclosed, the historical data is not available for KPI 2.

Relevance and materiality – ALIGNED

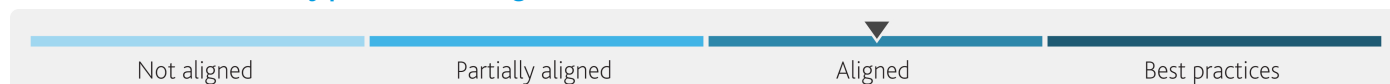
The selected KPIs are relevant, core and important to the company's business strategy. The selected KPIs are in line with the corporate sustainability strategy on GHG emission reduction and associated action plans, which include energy performance improvement of new and existing buildings.

The company intends to cover 100% of its GHG emissions for KPI 1-2, whereas KPI 1-1 only covers scope 1 and 2 emissions, which account for a minor portion of the company's emission profile. KPI 2 covers the majority of buildings that the company owns, including newly built offices, commercial buildings, logistics facilities, hotels, and resorts. The relevance and materiality of the KPIs are analyzed in detail in the Contribution to Sustainability section.

Best practices identified - selection of key performance indicators

- » There is continuity or traceability, with independent verifiers, in case of a change in the methodology used to measure KPIs
- » The KPI(s) definition(s) explicitly rely on external references, allowing them to be benchmarked
- » The KPI related data is externally verifiable

Calibration of sustainability performance targets



Consistency and ambition – ALIGNED

The company's SPTs are consistent with the company's sustainability strategy and are considered overall ambitious. The level of ambition is analyzed in detail in the Contribution to Sustainability section.

The means for achieving the SPTs will be disclosed in the framework and are considered credible.

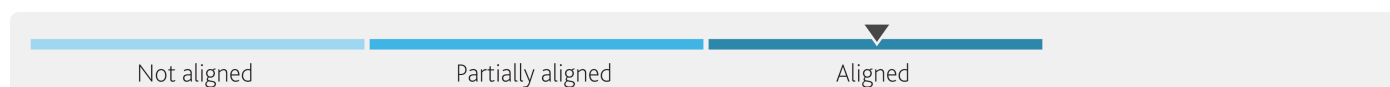
Disclosure – ALIGNED

The timeline and baseline year are disclosed in the framework, which will be made publicly available. Information regarding the trigger event date, adjustment mechanisms and extent of potential pricing adjustments will be included in the bond or loan transaction documentation.

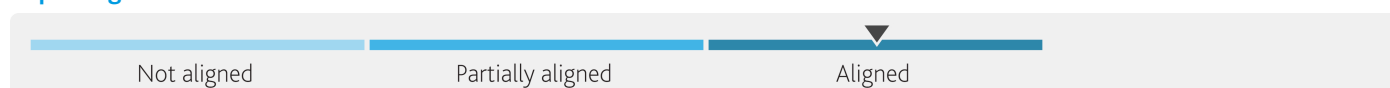
However, the company does not disclose intermediary targets for KPIs 1-1 and 1-2 to allow sufficient visibility of the KPI performance.

Best practices identified - calibration of sustainability performance targets

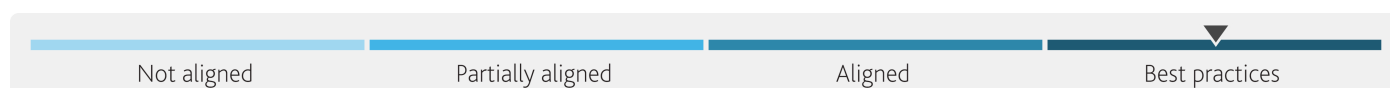
- » The means for achieving the SPT(s) are credible
- » The selected baselines are relevant and reliable

Instrument characteristics**Variation of structural characteristics – ALIGNED**

The financial instruments will be subject to either coupon or margin adjustment, donation or purchase of carbon credits depending on the achievement of the defined trigger events. The exact financial implications will be communicated to the investors through legal documentation.

Reporting**Transparency of reporting – ALIGNED**

The company commits to reporting annually and in the event of any significant changes until the last trigger event date. The intended scope and granularity of the reporting are clear and cover key elements for the investors to monitor the performance of the SPTs and the related impact.

Verification**Verification process – BEST PRACTICES**

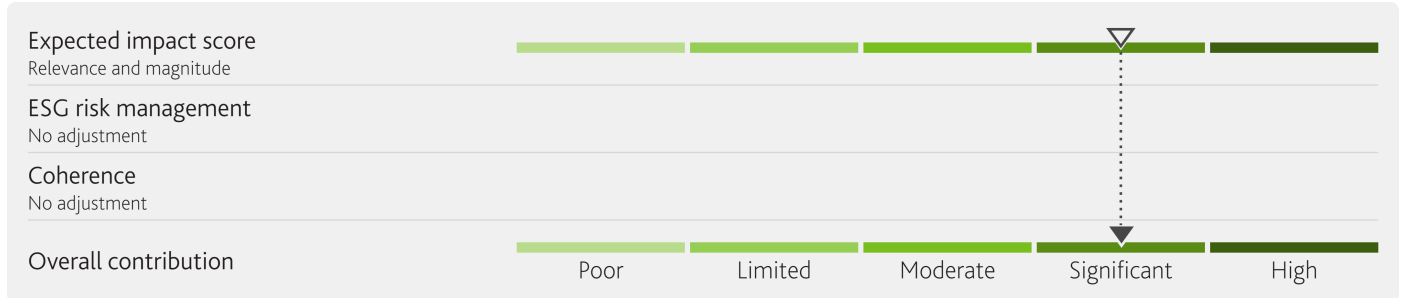
The company commits to conducting an external verification by a third party on the performance of each KPI against each SPT until the maturity of the bond or full payment of the loan. The verification will also be conducted in case of any relevant events leading to a potential change in the financial characteristics. The verification report will be publicly available on the company's website.

Best practices identified - verification

» Verification will be conducted until maturity of the bond or loan

Contribution to sustainability

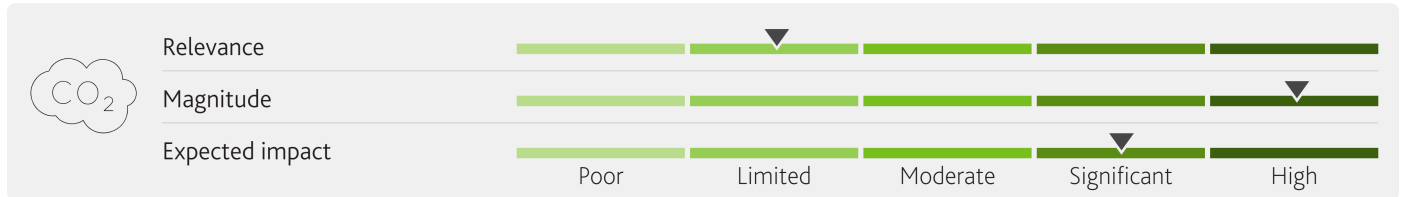
The framework demonstrates a significant overall contribution to sustainability.



Expected impact

The expected impact of all KPIs and SPTs on the sustainability objectives is significant. The company has communicated to us that KPI 1-1 will not be used for future financing and either KPI 1-2 or KPI 2 will be used. Thus, 0%, 50% and 50% weights were assigned to KPIs 1-1, 1-2 and 2, respectively. A detailed assessment is provided below.

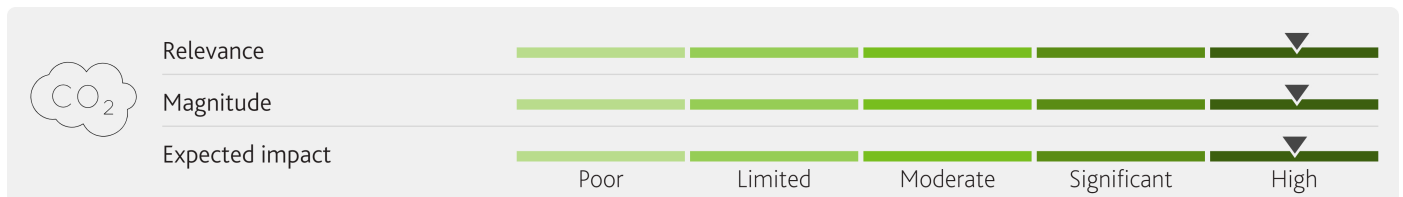
KPI 1-1: Scope 1 and 2 emission reduction



The relevance of this KPI is limited, mainly because of its low coverage. The KPI includes scope 1 and 2 emissions, which account for only a minor portion (around 10%) of the company's total GHG emissions. However, the KPI remains somewhat relevant for Mitsui Fudosan that commits to reaching net zero by 2050.

The magnitude is high because the SPT is in line with the most stringent sector standard. Our analysis incorporates a comparison against the sector standards, business as usual and peers. The company intends to reduce emissions by 46.2% by 2030 from the 2019 baseline, a target validated by SBTi as 1.5 degree aligned, a highly ambitious target. In addition, the SPT is equivalent to a 5.5% cumulative annual emission reduction, a significant improvement compared with the 7.4% cumulative average annual increase in the last three years. In terms of peer comparison, although there are some sector peers with more ambitious targets, the SPT is broadly in line with the top performers in the sector.

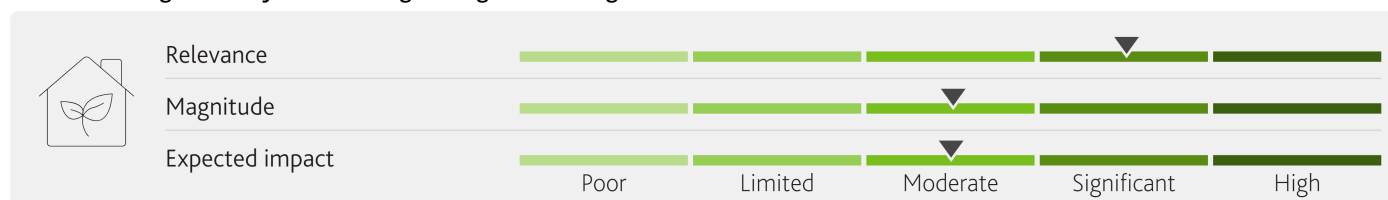
KPI 1-2: Scope 1, 2 and 3 emission reduction



The relevance of this KPI is high because the reduction of GHG emissions is a highly important sustainability issue to the company and the sector, and because of its comprehensive coverage. The KPI encompasses scope 1, 2 and 3 emissions from the Mitsui Fudosan Group, thereby accounting for the company's entire GHG emissions. The KPI is particularly pertinent because of the fact that the construction and operation of buildings contribute to around 39% of global GHG emissions²

The magnitude is high because the SPT is in line with the most stringent standard, similar to KPI 1-1. The company intends to reduce emissions by 40% by 2030 from the 2019 baseline, a target validated by SBTi as 1.5 degree aligned, a highly ambitious target. Furthermore, the SPT is equivalent to a 4.5% cumulative annual emission reduction, a significant improvement compared with the 7.9% cumulative average annual increase in the last three years. In terms of peer comparison, although some competitors may have set larger reduction targets, Mitsui Fudosan's SPT is ambitious considering the company's diversified business model with a focus on large-scale buildings.

KPI 2: Percentage of newly built buildings with green building certification



The relevance of this KPI is significant because obtaining green building certification is likely to ensure a certain level of sustainability performance of the buildings. The KPI covers newly built office buildings, retail facilities, and hotels and resorts, which by asset class represent most of the company's total assets (around 70%). Although the KPI does not extend to the refurbishment of existing buildings, it is not deemed significant because it is not core to the company's business model. The refurbishment or renovation of old buildings, especially those built before 1981 when the standards were renewed, is not commonly undertaken in Japan due to concerns around earthquake resistance.

The magnitude is moderate because the framework does not specify the exact list and level of certifications to be achieved. The company's sustainability strategy aims for all new constructions to achieve Zero Emission Buildings or Zero Emission House equivalent energy performance. However, the absence of a formal commitment in terms of the certification level means that there is room for the company to obtain lower level certifications, which may have lower sustainability performance.

Nevertheless, the SPT represents a significant improvement from the past trend, with the SPT aiming for a 100% certification rate going forward. The SPT is also broadly in line with the International Energy Agency's (IEA) Net Zero Emissions by 2050 Scenario (NZE Scenario), which states that all new buildings from 2030 onward need to be zero-carbon ready³. In terms of peer comparison, the SPT is broadly in line with the top performers in the sector, which also target all newly constructed buildings certified.

ESG risk management

We have not applied a negative adjustment for ESG risk management to the expected impact score. Because of the nature of the instrument, the proceeds cannot be earmarked.

Coherence

We have not applied a negative adjustment for coherence to the expected impact score because the KPIs and SPT set under this framework appear aligned with Mitsui Fudosan's sustainability strategy.

Appendix 1 - Mapping KPIs to the United Nations' Sustainable Development Goals

Mitsui Fudosan's framework is likely to contribute to three of the UN's SDGs, namely:

UN SDG 17 Goals	Eligible Category	SDG Targets
GOAL 9: Industry, Innovation and Infrastructure	KPI2: % of green building certifications obtained	9.4: Upgrade infrastructure and retrofit industries to make them sustainable, with all countries taking action
GOAL 11: Sustainable Cities and Communities	KPI 2: % of green building certifications obtained	11.6: Reduce the adverse per capita environmental impact of cities, with special attention to air quality and waste management
GOAL 13: Climate Action	KPI 1-1: Scope 1 and 2 emissions reduction KPI 1-2: Scope 1, 2, and 3 emissions reduction KPI2: % of green building certifications obtained	13.1: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries

The mapping of the UN's SDGs in this SPO considers KPIs and associated sustainability objectives/benefits documented in the company's financing framework, and resources and guidelines from public institutions, such as the ICMA's SDG mapping guidance and the UN's SDG targets and indicators.

Appendix 2 - Summary of key performance indicators in Mitsui Fudosan's framework

KPI	SPT	Unit of measurement	Sustainability Objectives
KPI 1-1: Percentage of Scope 1 and 2 emissions reduction	Reduce Scope 1 and 2 emissions by 46.2% by FY2030 compared to FY 2019	t-CO ₂ e	Climate change mitigation
KPI 1-2: Percentage of Scope 1, 2 and 3 emissions reduction	Reduce Scope 1, 2, and 3 emissions by 40% by FY 2030 compared to FY 2019	t-CO ₂ e	Climate change mitigation
KPI 2: Percentage of green building certifications obtained	100% of newly built buildings to be certified	number of buildings	Climate Change Mitigation Industry, innovation and infrastructure Sustainable cities and communities

Appendix 3 - Alignment with the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 and Sustainability-Linked Loan Guidelines 2022

Aligned

We have provided a supplementary opinion on the framework's alignment with the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 and Sustainability-Linked Loan 2022, as defined in the Scope section. This appendix covers requirements in the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 and Sustainability-Linked Loan 2022 that extend beyond the requirements in the SLBP and SLLP. Commensurate requirements that exist in both have been assessed in the Alignment with Principles section. As detailed in this Appendix, we consider the framework to be aligned with the the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 and Sustainability-Linked Loan 2022.

Reporting : Aligned

- » In line with the requirements, the issuer will publicly disclose information on SPTs when stating that they use Sustainability-Linked Loans. The company has included this information in the framework.

There is no material difference between SLBP and Japan Sustainability-Linked Bond Guidelines, as defined in the Scope section. We believe the requirements in the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022 are commensurate to those in SLBP, which have been assessed in the Alignment with Principles section. As such, we consider the framework to be aligned with the Japan Ministry of Environment's Sustainability-Linked Bond Guidelines 2022.

Endnotes

- [1](#) The point-in-time assessment is applicable only on the date of assignment or update.
- [2](#) [World Green Building Council](#), September 2019
- [3](#) [IEA](#), October 2023

Moody's assigns SPOs in alignment with the main tenets of the ICMA Guidelines for Green, Social, Sustainability and Sustainability-Linked Bonds External Reviews and the LSTA/LMA/APLMA Guidance for Green, Social and Sustainability-Linked Loans External Reviews, as applicable; Moody's practices may however diverge in some respects from the practices recommended in those documents. Moody's approach to assigning SPOs is described in its Assessment Framework, and is subject to the ethical and professional principles set forth in the Moody's Investors Service Code of Professional Conduct.

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

© 2024 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

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

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

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

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

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the credit rating process or in preparing its Materials.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability to any person or entity for any indirect, special, consequential, or incidental losses or damages whatsoever arising from or in connection with the information contained herein or the use of or inability to use any such information, even if MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers is advised in advance of the possibility of such losses or damages, including but not limited to: (a) any loss of present or prospective profits or (b) any loss or damage arising where the relevant financial instrument is not the subject of a particular credit rating assigned by MOODY'S.

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

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

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

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

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

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

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

REPORT NUMBER 1404039