

## CREDIT ANALYSIS

# Sparkassen-Finanzgruppe

Berlin, Germany

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This Credit Analysis provides an in-depth discussion of credit rating(s) for Sparkassen-Finanzgruppe and should be read in conjunction with Moody's most recent Credit Opinion and rating information available on [Moody's website](#).

### Summary Rating Rationale

Moody's assigns a corporate family rating (CFR) of Aa2 to Sparkassen-Finanzgruppe, based on its A2 standalone credit strength – which is mapped from its bank financial strength rating (BFSR) of C+ – and three notches of uplift as a result of our assumption of a very high probability of external support. Our support assumptions for the CFR rely on a strong likelihood of (i) regional and local government support; and (ii) systemic support from the German government. In our opinion, the levels of support are closely interlinked for public-sector banks, and therefore we use a unified approach of applying support uplift from multiple sources, anticipating concerted support solutions in case of need.

In assigning the BFSR and CFR to S-Finanzgruppe, we assess the group as if it acted as a single entity. This approach takes into consideration the cohesion and solidarity within S-Finanzgruppe – in particular between the savings banks – as well as the high level of co-operation amongst the members, which, in our view, allows for the assignment of both ratings. However, the constituent members of this group do not constitute a single economic entity with centralised management and control at the group level. The BFSR and CFR do not apply to individual members of the group, but only to the creditworthiness of the group as a whole.

The C+ BFSR is based on (i) the group's leading market share in German retail and SME banking; (ii) the well-diversified franchises of the majority of its members, which support the group in adverse market conditions; (iii) a moderate aggregate financial profile; (iv) the strong co-operation and co-ordination within the network of savings banks, which increasingly allows for synergies; and (v) the progress that S-Finanzgruppe has made towards strengthening the risk-management systems of its group members, especially amongst the savings banks. Furthermore, the C+ BFSR positively considers the group-specific mutual-support mechanisms available to each member of this group.

The C+ BFSR is mainly constrained by the weaker business models, risk profiles and financial results of the Landesbanken and certain portfolio concentration risks and risks related to the winding down of legacy portfolios. In addition, the group displays only modest profitability and a high cost structure compared with that of its global peers, partly caused by redundant functions in the group.

The standalone creditworthiness of the group as reflected in the C+ BFSR continues to be strongly underpinned by the intrinsic strength and robust performance of the savings banks throughout the financial crisis as well as the sound liquidity of the whole group.

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### Strong ownership and support mechanisms provide uplift to S-Finanzgruppe's Corporate Family Rating

S-Finanzgruppe's CFR of Aa2 is based on the A2 baseline credit assessment (BCA) and our view that the probability of support in the event of need is very high, both from the group's public sector owners – among them the various German federal states and local municipalities – and from the government of the Federal Republic of Germany (Aaa, stable).

Moody's assessment of a very high probability of support for S-Finanzgruppe from regional and local governments is based on our view that the individual members of the group would benefit from support forthcoming from its public sector owners (mostly federal states and municipalities) in the event of need. In addition to the ownership considerations, the support assessment is also based on: (i) the fact that the vast majority of the group's members are of vital importance to their respective local retail and SME markets, in particular the Sparkassen, which have strong market positions and close links to their local economies; and (ii) the often significant contributions of members to the tax revenues of their respective regional and local governments.

Moody's assessment of a very high probability of systemic support for S-Finanzgruppe is based on the group's significant role in the national payments system and its high importance to the national economy. In addition, Moody's notes the group's high market shares in loans (37%) and deposits (35%) in the German market.

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### S-Finanzgruppe's Corporate Family Rating

A CFR for a banking group (public sector, mutualist or co-operative) is Moody's opinion of a banking group's or an association's ability to honour its financial obligations, and is assigned to a banking group as if it had a single class of debt and a single, consolidated, legal-entity structure. A CFR does not reference an obligation or class of debt and thus does not reflect priority of claim. It does not apply to individual members of the group, but only to the creditworthiness of the group as a whole.

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### Individual Member Ratings

Moody's notes that, given the current level of S-Finanzgruppe's CFR, it is highly likely that the vast majority of the member banks, in particular the savings banks, would be assigned ratings of A1 or above (i.e. no more than two notches below the Aa2 CFR) in case that they sought their own senior debt and deposit ratings. Taking into consideration the group support that is available to any of the member banks, such an A1 rating is based on the assumption that the financial strength of the vast majority of the members of the group is not below the equivalent of a D- BFSR, and so will explicitly exclude those members that are insolvent and receive external support in order to avoid a default, as well as those that are nearly insolvent and likely to require such support in the near term. At the same time, we would stress that this minimum level of credit quality should no longer be assumed in the event of a material weakening of the group members' aggregate or individual financial strength or the cohesion among the members.

While we take comfort from the savings banks' strong performances recently, we note that the Landesbanken are now rated at or below the A1 level, with three of the higher-rated Landesbanken groups placed on review for downgrade on 15 February 2012. These reviews are part of a broader reassessment of bank ratings in Europe affecting 114 institutions (counted by group) in 16 European countries. The reviews reflect the multiple challenges that we consider these banks to face, notably (i) a weakening macroeconomic environment; (ii) costly and constrained market funding; and (iii) pressure

on profits. The review of the banks' standalone credit strength will focus on the challenges to and sustainability of their franchises and risk positioning, due to the inherent concentration risks in their wholesale-based banking activities and the declining creditworthiness of European banks.

According to Moody's rating methodology, every member bank of S-Finanzgruppe benefits from three support layers: (i) the support available within the group; (ii) regional and local government support; and (iii) systemic support. In the case of the Landesbanken, these levels of support are closely interlinked, and we anticipate concerted support solutions in case of need. Both savings banks and federal states (Bundeslaender) are not only parents/shareholders of Landesbanken. The federal states have also guaranteed some outstanding Landesbanken debt, and the savings banks are linked to Landesbanken through the cross-sector support mechanism of Germany's public-sector banks (Haftungsverbund). The scheme is designed to ensure the viability of all members, including all Landesbanken.

According to our assessment, the probability that support for the member banks would be forthcoming through these three main support layers is very high. At the same time, we consider overall support to have weakened, in particular for some of the Landesbanken where large-scale support was provided during the financial crisis. This reflects a decline in both the willingness and capability to provide support from regional governments.

## EXHIBIT 1

	BFSR	Senior Unsecured	Outlook	Short-Term
Bayerische Landesbank	D-	Baa1	Stable	P-2
Bremer Landesbank Kreditanstalt Oldenburg GZ	C-	A2	RuR DNG	P-1 RuR DNG
DekaBank Deutsche Girozentrale	C	Aa3	RuR DNG	P-1
HSH Nordbank AG	E+	Baa2	Stable	P-2
Landesbank Baden-Wuerttemberg	D+	A2	RuR DNG	P-1 RuR DNG
Landesbank Berlin AG	D+	A1	Stable	P-1
Landesbank Hessen-Thuringen GZ	C-	A1	RuR DNG	P-1
Landesbank Saar	D	A3	Stable	P-2
Kreissparkasse Koeln	C	Aa2	Stable	P-1
Norddeutsche Landesbank GZ	D+	A2	RuR DNG	P-1 RuR DNG
Ostdeutscher Sparkassenverband (OSV)	n/a	Aa3 <sup>1</sup>	Stable	n/a
Sparkasse KoelnBonn	D-	A1	Stable	P-1
Sparkassenverband Westfalen-Lippe	n/a	Aa3	Stable	n/a
Sparkassenverband Baden-Wuerttemberg	n/a	Aa3 <sup>1</sup>	Stable	n/a
WestLB AG	E	A3	RuR DNG <sup>2</sup>	P-2 RuR DNG <sup>2</sup>

<sup>1</sup> Long-Term Issuer Rating (Foreign)

<sup>2</sup> For WestLB Long and Short Term Bank Senior Debt Ratings on RuR DNG, Long and Short Term Bank Deposit Ratings on RuR UP, see PR [Moody's downgrades WestLB's BFSR to E; reviews extended for senior debt and deposits](#) as of 1 March 2012

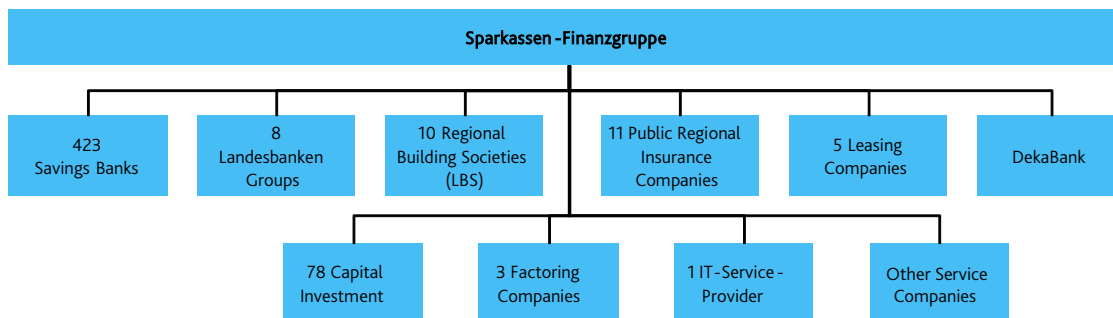
## Group Structure

### Public sector banks form the largest group in the domestic market

Public sector banks – mainly Sparkassen and Landesbanken – continue to have a strong role in the German banking market and, together with several specialised institutions and service providers, form S-Finanzgruppe. At the end of 2011, this association of banks comprised about 345,600 employees from 423 Sparkassen, eight Landesbanken groups, the dedicated mutual fund provider DekaBank, ten Landesbausparkassen that provide residential mortgage products and about 180 institutions, mainly in the fields of life and non-life insurance, leasing and factoring, brokerage, asset management and real estate. All public sector banks ultimately relate back to different levels of government: (i) most savings banks are public legal bodies of their local municipalities and regional authorities (*Kreise/Landkreise*) and (ii) regional governments together with regional savings banks associations own the Landesbanken.<sup>1</sup>

EXHIBIT 2

### Group Structure



Source: Sparkassen-Finanzgruppe, Moody's

### Recent results and company events

At year-end 2011, S-Finanzgruppe had total assets of €2.5 trillion (decrease of 1.4% year-on-year, driven by Landesbanken deleveraging of €49 billion) and equity of €129 billion (€125 billion at year-end 2010), according to statistics published by Deutsche Bundesbank. S-Finanzgruppe remains the largest banking group in the world by total assets. Aggregate accounts for the full-year 2011 are only available for the savings bank. While most of the Landesbanken will report their results in the upcoming weeks, aggregate figures for S-Finanzgruppe's performance in 2011 will only become available later this year.

Despite the ongoing euro area sovereign debt crisis, the savings banks reported very solid pre-provision income of EUR11.8 billion (in line with results in 2010) and a pre-tax profit of EUR4.7 billion (up from EUR4.5 billion in 2010). At 79% of total revenue, interest income remained the major source of the group's income at EUR23.6 billion, increasingly marginally (0.4% year-on-year) on the back of increased lending volumes. Fee income increased slightly to EUR6.4 billion (+0.9%).

The savings banks were able to maintain an excellent loan-to-deposit ratio of 86%, well better than many of its competitors. Major parts of their more than EUR100 billion excess liquidity is provided as a stable funding source to the Landesbanken. Loans to customers increased by EUR16.8 billion to EUR677.1 billion, with growth in loans to corporates the main driver due to the strong performance

<sup>1</sup> HSH as an exception has a minority shareholder outside of the public sector. Unlike the savings banks most of the Landesbanken have a private sector charter by now with the exception of Helaba and NordLB, both continued to be run with a public sector charter (*Anstalten des Öffentlichen Rechts*).

of the German economy. Deposits increased by EUR15.6 billion (+2%) to EUR783.4 billion. At the same time, S-Finanzgruppe lost 2 percentage point in market share for deposits (35% as of YE 2011) amid fierce competition in a strong market while maintaining its 37% market share in loans.

The negative valuation result increased to EUR6.8 billion in 2011 from EUR6.2 billion in 2010 as a result of diverging developments. The main drivers of the increase were (i) the write-down of their securities portfolio by EUR1.2 billion, mainly as a result of the euro area sovereign debt crisis; and (ii) the write-down on the goodwill for their stake in Landesbank Berlin by EUR850 million. At the same time the savings banks reduced risk charges to EUR0.6 billion after credit charges of EUR1.6 billion in 2010 and EUR2.9 billion in 2009, on the back of the German economy's continued strong performance. The savings banks used the good profitability to again build significant reserves of EUR3.6 billion (2010: EUR3.9 billion and 2009: EUR3.7 billion).

In H1 2011, the Landesbanken reported total pre-provision income of EUR2.45 billion (+54% year-on-year), predominantly due to growth in net interest income. Loan loss provisions sharply decreased to EUR232 million in H1 2011 from EUR992 million in H1 2010. As a result, pre-tax income increased to EUR1.76 billion from EUR261 million in H1 2010. Total assets at the Landesbanken have decreased by almost 15% since year-end 2009 as a result of significant deleveraging.

While year-end 2011 results for the Landesbanken have not yet been published, we expect H2 2011 results to reflect significant write-downs on the substantial securities portfolios related to European peripheral countries. According to Moody's estimation, their aggregate gross exposure to peripheral countries amounted to EUR56.6 billion as of June 2011 and were mainly related to Italy and Spain. Against this exposure, the banks held provisions and reserves of EUR8.1 billion. Provisioning levels against the banks' exposure to Greece of EUR4.5 billion was 48%. As a result, we expect further write-downs in H2 2011 and some limited additional losses from the banks' manageable aggregated net CDS exposure of EUR124 million to Greece as reported by the European Banking Authority as part of their capitalization exercise in December 2011. These CDS were triggered on 9 March 2012 and relate mainly to NordLB (EUR92 million) and WestLB (EUR77 million). Otherwise the CDS exposure of the Landesbanken to peripheral European countries is very limited.

## EXHIBIT 3

**Key Financials**

(€ Billion)	Landesbanken	Sparkassen	S-Finanzgruppe
<b>Key Financials 2011<sup>1</sup></b>			
Total assets	n/a	1,098.0	n/a
Total equity	n/a	63.5	n/a
Pre-tax profit	n/a	4.7	n/a
<b>Key Financials 2010<sup>1</sup></b>			
Total assets	1,463.5	1,084.3	2,601.7
Total equity	61.1	58.5	122.2
Pre-tax profit	1.8	6.6 <sup>2</sup>	8.7
<b>Key Financials 2009<sup>1</sup></b>			
Total assets	1,457.9	1,073.3	2,582.8
Total equity	68.0	56.0	126.7
Pre-tax profit	-4.9	4.7	-0.3

<sup>1</sup> Aggregated, not consolidated, based on German GAAP (HGB)

<sup>2</sup> Not including risk provisioning for holdings (compares to EUR4.5 billion pre-tax profit including risk provisioning for holdings)

Source: Sparkassen-Finanzgruppe

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### Recent Credit Events in the Landesbanken sector and for DekaBank

On 15 February 2012, Moody's placed on review for downgrade four major members of Sparkassen-Finanzgruppe (S-Finanzgruppe) and all their rated subsidiaries. The reviews affect Landesbank Hessen-Thüringen (Helaba, A1/C- on review for downgrade; P-1 affirmed), Landesbank Baden-Württemberg (LBBW, A2/P-1/D+ on review for downgrade) and Norddeutsche Landesbank (NordLB, A2/P-1/D+ on review for downgrade) together with its majority-owned subsidiary Bremer Landesbank (A2/P-1/C- on review for downgrade). Also affected is S-Finanzgruppe's fund manager DekaBank Deutsche Girozentrale (DekaBank) (Aa3/C on review for downgrade; P-1 affirmed).

These announcements are part of a broader reassessment of bank ratings in Europe affecting 114 institutions (counted by group) in 16 European countries. The reviews reflect the multiple challenges that we consider these banks to face, notably (i) a weakening macroeconomic environment; (ii) costly and constrained market funding; and (iii) pressure on profits. These challenges may lead us to adjust downward our assessment of several important rating factors, notably economic stability, franchise value, risk positioning, liquidity, profitability and capital. Consequently, European banks face immediate pressures centred on their ability to retain the confidence of investors. For more details please see our reports "Why Global Bank Ratings Are Likely To Decline In 2012", "Euro Area Debt Crisis Weakens Bank Credit Profiles" and "European Banks: How Moody's Analytical Approach Reflects Evolving Challenges", all published on 19 January 2012.

The review of the banks' standalone credit strength will focus on the challenges to and sustainability of their franchises and risk positioning, due to the inherent concentration risks in their wholesale-based banking activities and the declining creditworthiness of European banks. The review will also assess their future earnings power and capital against their risk-weighted and total assets under our scenario of stressed earnings and capital levels. Considerations of support will not form part of these reviews, as the rating pressure from the weakening support environment in Germany was factored into the fully supported ratings of these banks in a previous rating action on 16 November 2011.

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### The Landesbanken sector is in transition

In 2011, S-Finanzgruppe's structure was simplified, supporting better governance and strategic alignment. Dekabank is now fully owned by the savings banks, whilst S-Finanzgruppe aimed for a squeeze-out of the remaining minority shareholders (share of 1.33%) at Landesbank Berlin AG in order to achieve 100% ownership from the savings banks. We expect S-Finanzgruppe to take advantage of the full ownership of both institutions to further optimize their set-up to the needs of the savings banks.

The Landesbanken have made significant progress in downsizing their operations since the outbreak of the financial crisis. Total assets decreased again by 10% in 2010, whilst HSH Nordbank (HSH) and WestLB AG obtained approval for their restructuring plans from the EU. We expect that the EU will make its decision about compensation for state aid for Bayerische Landesbank (BayernLB) in H1 2012. HSH will see significant further downsizing, with the effect that its core operations will only account for EUR82 billion at the end of 2014 compared with EUR208 billion in 2008.

WestLB will cease to exist in its current form by mid-2012. The business related to the savings banks will be carved out into a new "Verbundbank" with EUR 40-EUR 45 billion in total assets and freshly capitalised with EUR 1.0 billion by the savings bank associations in NRW and S-Finanzgruppe. Helaba is expected to take-over the Verbundbank including the funding from the savings banks. For the transition period WestLB's shareholders including the savings bank associations committed to



agree on "appropriate measures" to ensure WestLB's liquidity and its ability to act as market counterparty during the transformation. By July 1 most of WestLB's remaining liabilities will have been transferred into EAA Erste Abwicklungsanstalt (EAA, Aa1 stable/Prime-1) or Helaba and the savings banks will exit WestLB. WestLB will then no longer engage in new banking business and will be transformed into a servicing platform including a run-down vehicle that holds legacy positions transferred to or hedged by EAA.

An important driving force in transforming the Landesbanken franchises is the expiring of more than EUR200 billion grandfathered debt outstanding by the end of 2015. By this time, the Landesbanken will have to be self-sufficient in terms of market funding and able to achieve adequate returns to compensate for the cost of risk.

Mergers among Landesbanken may play a role as well for which we have started to observe increased political support more recently as in the example of Helaba (A1 on review for downgrade/P-1/C- on review for downgrade) proposed acquisition of the core business related to the sector from WestLB. Further merger activity could lead to accelerated de-risking, important synergies and may positively affect the strength of S-Finanzgruppe as a whole. Nevertheless, we do not expect any large-scale consolidation in the near future and caution that potential losses from non-core portfolios might be a burden for any merger negotiations, in particular if they are not contained by already existing government-guarantee schemes. As a result, we expect further consolidation to happen only over a longer time horizon.

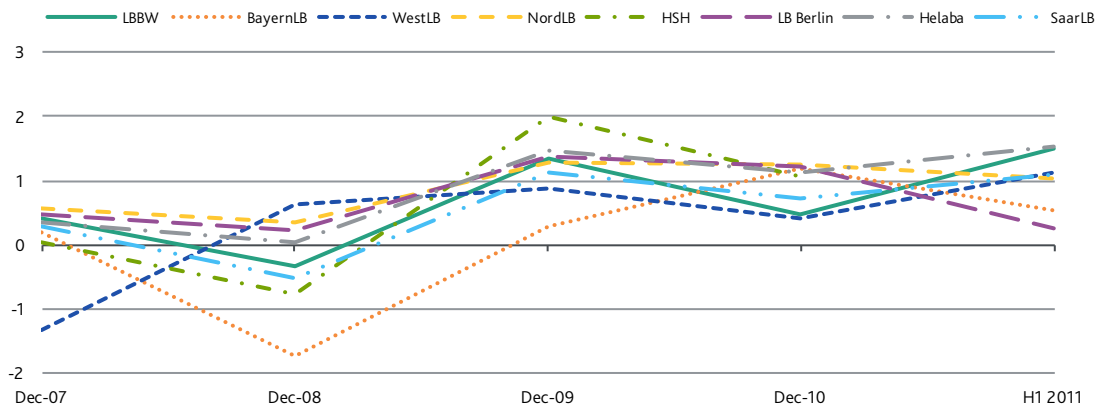
## Key Issues

### Financial weakness of Landesbanken constrains S-Finanzgruppe's financial profile

Despite some moderate improvements recently the weak financial fundamentals of several Landesbanken continue to exert significant pressure on S-Finanzgruppe's aggregate financial profile. Following numerous BFSR downgrades during the crisis, we now rate the majority of the nine German Landesbanken in the D and E ranges; these BFSRs translate into BCAs of Baa3 and below, reflecting not only weak fundamentals but also challenges to their future franchises and concerns about their ability to restore profitability and capitalisation.

EXHIBIT 4

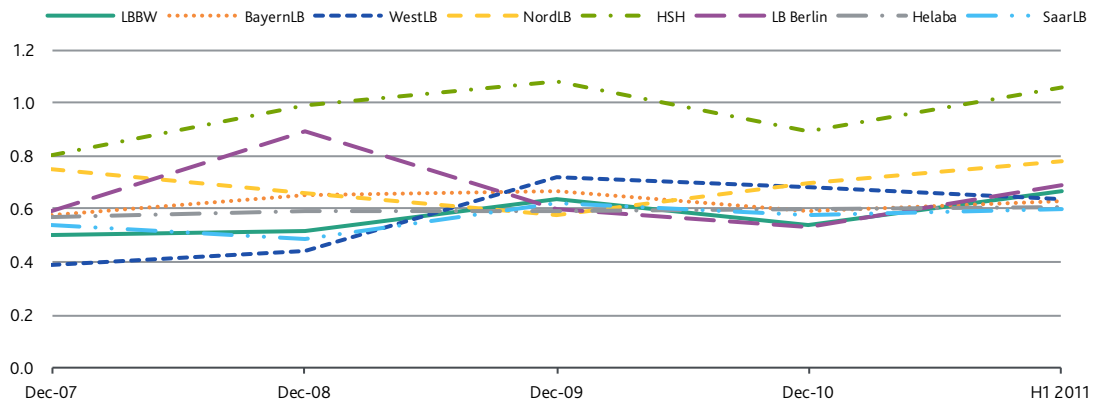
#### Pre-provision profit % RWA – Landesbanken



Source: Moody's Investors Service based on companies' reports

For most Landesbanken, the recovery of risk-adjusted profitability at the PPI level continued during H1 2011 (Exhibit 4). However, this was partially driven by valuation recoveries which are non-recurring, while net interest margins remained largely stable (Exhibit 5). Amid the benign German business climate, banks were able to further reduce their risk provisioning for loans. This was partly offset by the write-offs on and spread widening of government debt securities in the European periphery, especially Greece in H2 2011. In 2010, almost all Landesbanken (except for LBBW) had posted positive results, reflecting (i) major restructuring charges in the previous years; (ii) the offloading of non-strategic assets in the case of WestLB; and (iii) ample risk shields provided by the regional governments.

EXHIBIT 5

**Net interest margin – Landesbanken**

Source: Moody's Investors Service based on companies' reports

From our stress tests on S-Finanzgruppe's earnings, assets and capital, we note that the group's risk profile and aggregate capitalisation have lost some of their robustness during the crisis, which is reflected in an assigned BFSR of C+, from B- at the end of 2009. Although Landesbanken are currently performing significantly better than at the peak of the financial crisis, we expect challenges in the funding market to persist once the recent support by the European Central Bank has faded out. More expensive and potentially constraint access to the funding markets together with increased capital requirements will weigh on their profitability. Moreover, some of the Landesbanken continue to undergo severe restructuring that bears considerable execution risks. Given the significant legacy portfolios and the burden imposed on these banks to compensate for government aid, we expect their performance to remain subdued over a medium term horizon.

### Savings Banks Continue To Show Resilient Earnings And Robust Capitalisation

Taken together, the financial fundamentals of the 423 savings banks remain very solid, underpinned by a resilient and predictable stream of quality earnings, good liquidity and risk management as well as strong economic capitalisation, which have helped the sector to weather the financial crisis. Savings banks continue to benefit from very strong and deeply entrenched franchises in their regional retail banking markets, evidenced by high and well-defended market shares as well as their strong brand value and low risk profiles.



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### Joint-Liability Scheme Ensures Group Members' Liquidity and Solvency

S-Finanzgruppe's guarantee system is in the form of a joint-liability scheme (Haftungsverbund), which comprises: (i) the 11 guarantee funds of the regional Sparkassen; (ii) the guarantee fund of the Landesbanken; and (iii) the guarantee fund of the regional building societies (Landesbausparkassen).

Under this structure, the pre-funded guarantee schemes protect all German Sparkassen, Landesbanken and regional building societies, and in particular safeguard their liquidity and solvency. However, it is noteworthy that the joint-liability scheme and guarantee funds, whilst providing considerable support for the members of the group, do not constitute a legally binding guarantee that would result in all beneficiaries receiving the same credit rating.

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### Limited Strength of Mutual Support Arrangements In Times of Crisis

The crisis has shown that the strength of the mutual support mechanisms of Germany's public sector banks – in principle available to all members – is challenged during a financial crisis on the scale recently witnessed; several of their larger members have been, and currently remain, too weak to fend for themselves in times of stress, let alone support others.

As a result, we cannot rule out that the sector will at some point review the mutual support mechanisms; however, this is not expected in the short term, and factoring this into our ratings would be premature. Importantly, we do not consider this a uniform trend across the system, not even for the larger members. The majority of public sector banks will likely continue to benefit from unchanged support in the foreseeable future. In particular, the far smaller and more risk-averse savings banks will almost certainly maintain their mutual support arrangements, which remain not only very strong, but also perfectly viable.

The savings banks remain in need of Landesbanken (i) in their capacity as central clearing institutions; and (ii) to ensure the availability of products and services that each of the 423 retail members cannot provide (or should, reasonably, not be providing) for themselves. However, fewer central institutions would suffice for those purposes alone, and mutual support for a smaller number of Landesbanken would appear both more reasonable and viable (and thus credible). As a result, the sector may either seek amendments to the mechanisms or – if that is not considered an option – seek to have fewer Landesbanken as members. Alternatively, the savings banks may push for an accelerated consolidation coupled with a major shrinking exercise of the Landesbanken; however, their political powers to enforce such a restructuring are limited as in most cases they are not the majority owner and hence have to coordinate with the regional governments as the other owners. We therefore expect that it may take many years before material progress is achieved.

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### Sector Support May Weaken For Exit Candidates

Moody's will continue to monitor and may reassess the strength and reliability of cross-sector support for individual banks, should further developments suggest that single members could be asked to leave the association. This may apply to the WestLB, once it will have been dismantled in the course of this year following which the very small remaining entity is likely to cease its banking operations and will be solely owned by the regional government. We note that in the cases of BayernLB and HSH, the regional savings banks did not contribute to the rescue package, which in the end had to be shouldered by the respective regional governments. Whether these banks will exit the associations at some point will depend on future ownership. If these banks succeed in repositioning their franchises and re-establishing viable business models, the regional governments as their current majority owners may

want to privatize them which would probably result in an exit from the public sector support schemes. We also note that there is a two-year fade-out period for banks that exit the cross-sector support agreements of the group.

## Analysis of Rating Considerations

### Discussion of Qualitative Rating Drivers

#### Franchise Value

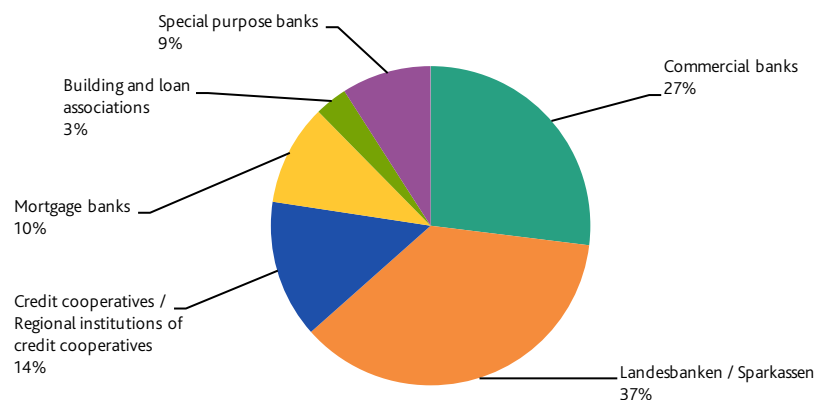
Public-sector banks – essentially savings banks and Landesbanken – continue to have a leading role in the German banking market and together form S-Finanzgruppe. At the end of 2011, this association of banks comprised about 345,600 employees from 423 savings banks, nine Landesbanken, DekaBank and about 125 other financial service providers, mainly in the fields of life and non-life insurance, central building societies, leasing and factoring, brokerage, asset management and real estate.

The franchise of the S-Finanzgruppe is one of the strongest in the German market, driven largely by the strong positioning of the local savings banks. With about 50 million customers and leading market shares of approximately for deposits (35%) and lending (37%), the savings banks benefit from their very strong and deeply entrenched franchises in their regional retail banking markets and a strong brand value. Increasingly, the savings banks are using their strong market position and expanding their wealth management and brokerage activities for retail customers to provide a better balance between interest and fee income.

Our assessment also includes major challenges for some of the Landesbanken's franchises, which account for approximately 55% of the assets of the total group. Since 2007, four of the Landesbanken have received substantial support in the form of capital injections and state guarantees. They remain under the scrutiny of the EU commission to adapt their business models and divest major parts of their assets.

#### EXHIBIT 6

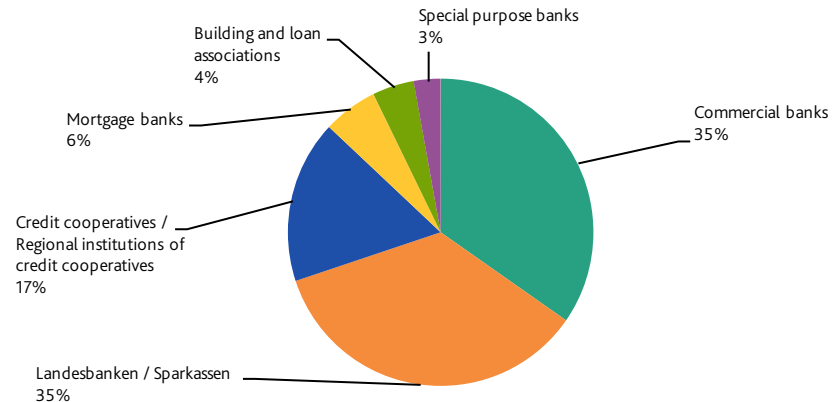
#### Market shares – Lending to Non-Banks, Dec 2011



Source: Deutsche Bundesbank, Moody's

EXHIBIT 7

## Market shares – Deposits from Non-banks, Dec 2011



Source: Deutsche Bundesbank, Moody's

### Risk Positioning

The members of S-Finanzgruppe have always had to comply with German banking regulations and are subject to the supervision of the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht or BaFin). The group members, as public-sector banks, are also subject to the supervision of their respective federal states (Sparkassenaufsicht) via the Ministry of Finance, the Ministry of Economics, or the Ministry of the Interior (depending on the state).

Pilot projects to explore credit risk management processes, which are of importance to all savings banks, are increasingly centralised with some or all of the constituent associations and a number of pilot savings banks. This is aided by a rising awareness and focus on profitability and efficiency by the traditionally balance-sheet-focused savings banks.

Risk appetite and positioning is within the area of responsibility of the individual institution. Since neither the German Savings Banks Association (DSGV), nor the regional associations have any power to enforce a centralisation of activities or the use of a specific model, the group very much relies on aggregated benchmarking and best-practice examples developed in the manner described above. However, best-practice examples are available to all savings banks and back-office credit activities benefit from a standardised approach supported by uniform instruments.

The liquidity profile and management in the sector is a key strength, given the liquidity surplus of the savings banks which can be made available for the Landesbanken's treasury activities.

Our assessment of market risk reflects that interest-rate risks are the primary source of market risk for the savings banks, given their prevailing traditional commercial banking profiles with maturity mismatches between short-term deposits and longer-term lending in combination with the Landesbanken's trading and investment activities, which leads to considerable market risk for the group. We expect market risk exposure to decrease as a result of further de-risking and deleveraging of the Landesbanken.

## Discussion of Quantitative Rating Drivers

Our analysis relies on aggregate financial numbers because consolidated information for S-Finanzgruppe is not available. However, given the Regional Principle for the Sparkassen, we believe that consolidated figures, at least for the Sparkassen network, would not differ materially from the aggregate numbers. Nonetheless, the inclusion of the Landesbanken in S-Finanzgruppe naturally results in a divergence between aggregate and consolidated figures. In light of the public sector's structure, we do not expect S-Finanzgruppe to provide consolidated figures for the foreseeable future, with adverse implications for public disclosure and financial transparency.

### Profitability

The members of S-Finanzgruppe, as public-sector banks, have to strike a balance between their public-service mission and the need to ensure a level of profitability that allows them to protect their financial health and to fund growth internally. At most member banks, management typically opts for a strategy that aims to ensure a stable evolution of profits and a satisfactory level of profitability to preserve the bank's financial independence in the long term.

The sector's profitability has historically been sub-par for the assigned rating and remains an important rating constraint. Profitability is skewed towards interest income, and net interest margins have been – and for most savings banks continue to be – under pressure because of fierce competition in the German retail and SME market. In line with our expectations, net interest income stabilised at the prevailing low funding costs from deposits. S-Finanzgruppe bolstered its provision income on the back of increased fees at the savings banks (EUR6.3 billion up from EUR6.1 billion in 2009) and stable fees at the Landesbanken of EUR1.2 billion.

Their large and increasing deposit funding base (EUR783 billion as of 2011) allows the savings banks to benefit from the current yield curve which supports relatively strong net interest income. However, their earnings potential remains constrained by the current low interest rate environment which continues to put pressure on margins and which we expect to persist for several years. Additional pressure on pre-tax profitability will likely be exerted by rising risk charges following the exceptionally benign credit environment in 2011, as a result of the European sovereign crisis and the likely negative impact of austerity measures across Europe on the real economy.

The weaker and more volatile profitability of the Landesbanken continues to be constrained by narrow interest margins due to intense competition in the corporate segment, volatile trading income as well as due to the notably higher cost of wholesale funding. To some extent this may partly be compensated by the ongoing deleveraging of their balance sheets that mostly focuses on low-yielding investments. At the same time the Landesbanken face the challenge of reducing operating costs in tandem with decreasing business volumes and related revenues.

The earnings volatility resulting from a relatively high yield-curve exposure at the savings banks adds to the various challenges and constitutes a major rating constraint for S-Finanzgruppe.

### Liquidity

The savings banks benefit from high funding levels from retail deposits and most have surplus liquidity. However, Landesbanken rely on wholesale funding and will face significant refinancing needs over the coming years. In particular, during 2014-15, the bulk of grandfathered debt (more than EUR200 billion) will mature, which could exert pressure on their liquidity profiles in the years ahead.

On the back of EUR783 billion in deposits (up 2% y-o-y), the savings banks post a very strong loan to deposit ratio of 86%, resulting in structural liquidity of more than EUR100 billion. As of YE 2010, S-

Finanzgruppe had a loan to deposit ratio of 103%, an open cash position of EUR31 billion and a substantial securities position of EUR508 billion.

### Capital Adequacy

The financial fundamentals of the savings banks are underpinned by strong economic capitalisation. When including the sizeable undisclosed, fully taxed reserves that they put aside under local GAAP, their aggregate capitalisation is considered solid and able to absorb considerable shocks. That said, the described practice of building undisclosed reserves and maintaining sound capital levels is appropriate because it mitigates their limited access to equity capital markets and has historically helped them to finance gradual internal growth.

The Landesbanken display considerably higher leverage compared with the savings banks, which leaves them more vulnerable to event risk or any renewed market disruption. Capitalisation as well as the quality of capital improved with recent support measures for four of the nine Landesbanken, which were necessary given substantial shortfalls during the financial crisis. We also saw significant further capital strengthening at NordLB (A2/P-1/D+ all on review for downgrade) and a restructuring of silent participations at Helaba that ensures recognition as core Tier 1 capital of these instruments under Basel III. However, related costs will affect their performance over the next few years and weigh on their future ability to internally generate and retain capital. Capitalisation will remain a concern in the Landesbanken sector because they currently remain highly leveraged, and also since a significant part of their capital still constitutes (non-core Tier 1) hybrid capital, which will need to be restructured or replaced in order to comply with Basel III. We note that expected losses on domestic assets have decreased due to the strong performance of the German economy. At the same time, we believe that material losses may materialise in international commercial real estate or ship financing, potentially affecting several Landesbanken, which would weigh on the group's capitalization to the extent they are unforeseen and hence have not been provided for.

On an aggregate basis, S-Finanzgruppe had a capital base of EUR168.1 billion at YE 2010, representing a slight decrease from the EUR174.7 billion capital the year before and at the same level as in 2008. This indicates that the net capital injections and capital generation since 2008 were, if not paid out as dividends, largely absorbed by the losses of the Landesbanken in 2008 and 2009.

On an aggregate basis, capital ratios are comfortable, with total capital equivalent to 16.0% of risk-weighted assets and core capital of 10.9%. The Landesbanken's reported capitalisation levels at the end of 2010 were higher than those of the savings banks (Tier 1 of 12.1% compared with 9.9%), due to significant deleveraging by the Landesbanken in 2010 (risk positions down by 22%) and the ongoing risk shields provided by their shareholders, specifically at BayernLB, HSH and LBBW. We note that the savings banks benefit from substantial and fully taxed, but undisclosed reserves (§340f HGB), which are not included in the reported Tier 1 capital. Since these reserves will not be recognised as regulatory capital in the future, the savings banks have transferred approximately EUR3 billion of undisclosed reserves (§340f HGB) to disclosed reserves (§340g HGB) in 2011. Overall, the savings banks increased their aggregate Tier 1 ratio to 10.5% in 2011 from 9.9% in 2010 and their total capital ratio to 15.8% from 15.1%.

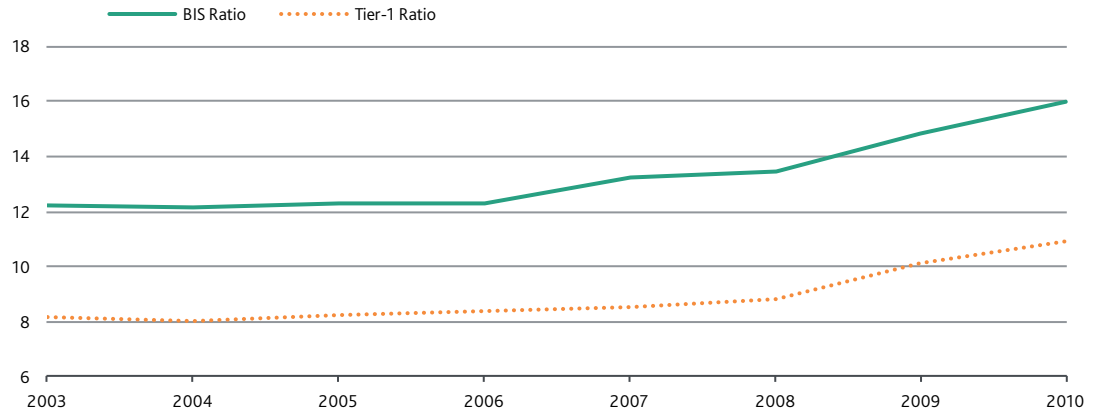
From our stress-testing of S-Finanzgruppe's earnings, assets and capital, we conclude that overall aggregate capital levels remain sound and are capable of absorbing major credit losses. However, it is important to note that capital cannot be freely allocated to single members within the group, and that the risk of renewed cases of distress due to capital shortfalls cannot be ruled out. In addition – and despite the recent capital injections by regional governments – we consider that there is limited political appetite for further capital injections. In addition, there are forthcoming austerity measures at

the level of the regional governments which may make it more difficult for them to afford capital measures in the future. Fiscal debt brakes may be established at the level of the regional government and will then provide for an additional institutional constraint for further capital measures.

EXHIBIT 8

**Capital Ratios (%)**

S-Finanzgruppe



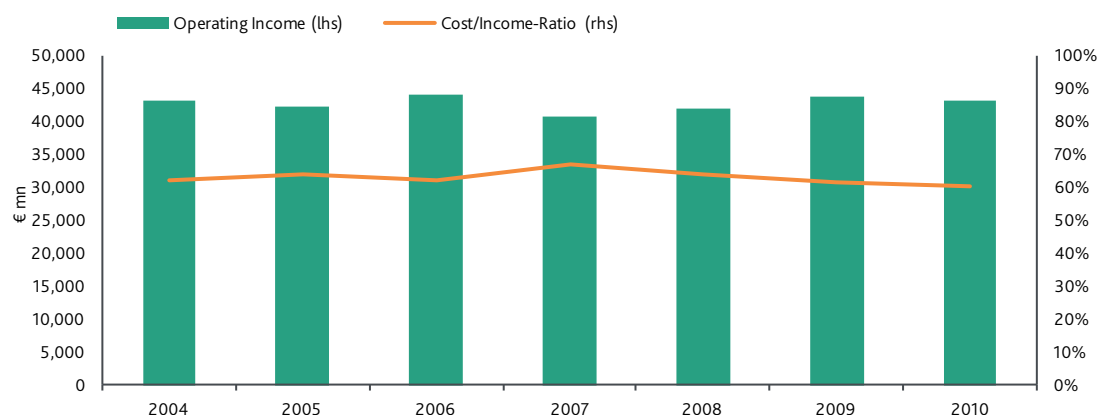
Source: Moody's Investors Service based on Company's reports

**Efficiency**

S-Finanzgruppe shows a satisfactory level of operating efficiency, albeit comparing less favourably with its international peers. As savings banks continue to operate through an extensive branch network – and as their organisational structure remains fragmented – the potential for achieving economies of scale is therefore limited. The target cost-to-income ratio for savings-bank members is 60%. Although the majority of the savings banks still fall short of this benchmark, we note an improving trend for the group because of the more efficient cost structures.

We believe that the group will continue to benefit from centralised solutions and outsourcing, in particular, for investment requirements in IT, risk management and customer segmentation; this should help the group achieve the stated target over the next few years. In this context, we note positively that in contrast to many commercial banks and Landesbanken, the savings banks typically do not rely on restructuring charges. Instead, they adjust to changing market conditions, as and when changes arise.

EXHIBIT 9

**Cost/Income Ratio**

Source: Moody's Investors Service based on Company's reports



### Asset Quality

S-Finanzgruppe has a strong focus on the domestic market, with diverse lending exposures including public sector finance, financial institutions, residential mortgages (which form the lion's share of retail lending), consumer loans and corporate lending with a strong focus on SMEs. Additionally, the Landesbanken are exposed to diverse international lending and asset-finance activities as well as large investment portfolios, which have led to major market and credit losses during the global financial crisis. Although we believe that the bulk of the risks related to structured credit products will likely be written-off or provided for, the group remains vulnerable to sizeable commercial real-estate and ship-financing exposures, whose performance may yet cause further credit losses.

S-Finanzgruppe's asset quality benefited from the strong performance of the German economy in 2010 and 2011. At the same time we caution that eroding investor confidence and a weakening of many regional economies across Europe has weakened the credit profile of many of S-Finanzgruppe's counterparties. Given substantial public finance books and CDS exposure, in particular with the Landesbanken, S-Finanzgruppe will not remain unaffected.

Whilst risk charges for the group fell significantly in 2010, risk charges for the savings banks increased slightly in 2011 due to EUR1.2 billion write-downs on their securities holdings (including Greece) and a EUR850 million write-down on the goodwill for their stake in Landesbank Berlin (A1; D+ / Baa3 stable). Although credit charges decreased by EUR1 billion year-on-year in 2011, we remain cautious given the deteriorating macroeconomic environment, particularly in the economies of Germany's main trading partners.

A very high proportion of the loan book is backed by conservatively valued residential property, particularly in retail business, where most loans have loan-to-value ratios below 80%, partly due to the relatively stable conditions in the German housing market. In addition, within the corporate customers segment that includes SMEs and self-employed clients, a significant proportion of lending is supported by collateral, with unsecured lending mainly consisting of shorter-term facilities for working capital.

In general, we believe that the loan portfolio is well managed, due to prudent lending criteria and strong diversification across a large number of borrowers. The current state and expected performance of the German economy alleviates some of the risk related to sector concentrations in the automotive and construction sectors, amongst both the savings banks and the Landesbanken.

## Discussion of Support Considerations

Support considerations for S-Finanzgruppe result in a three-notch uplift for the group's Aa2 CFR from its A2 BCA (which is mapped from the C+ BFSR, see Exhibit 10). See the Summary Rating Rationale at the beginning of this report for a detailed discussion of the support considerations.

### Discussion of Support Considerations

EXHIBIT 10:

#### Mapping the BFSR to the Baseline Credit Assessment (BCA)

The discussions of qualitative and quantitative rating drivers presented in this report forms the analytical basis for assigning a Bank Financial Strength Rating (BSFR) of "C+" to Sparkassen-Finanzgruppe.

BFSRs are Moody's opinions on the intrinsic safety and soundness of a bank enterprise and, in effect, address the susceptibility of a particular institution to financial distress.

The BFSR array of ratings is not on Moody's traditional rating scale (Aaa, Aa, etc.). There is a useful method, however, for translating BFSRs to Moody's traditional scale – the baseline credit assessment. In effect, the baseline credit assessment measures a bank's stand-alone default risk assuming there is no systemic or other external support.

Sparkassen-Finanzgruppe's "C+" BFSR maps to a baseline credit assessment of A2, yet, considering external support factors, its corporate family rating is Aa2.

#### BFSR/Baseline Risk Assessment Mapping for Sparkassen-Finanzgruppe

BFSR	Baseline Credit Assessment (BCA)
A	Aaa
A-	Aa1
B+	Aa2
B	Aa3
B-	A1
C+	A2
C	A3
C-	Baa1
C-	Baa2
D+	Baa3
D+	Ba1
D	Ba2
D-	Ba3
E+	B1
E+	B2
E+	B3
E	Caa1
E	Caa2
E	Caa3

## Company Annual Statistics

### Sparkassen-Finanzgruppe

	31-Dec-2010 Euro (Millions) Basel II Local GAAP	31-Dec-2009 Euro (Millions) Basel II Local GAAP	31-Dec-2008 Euro (Millions) Basel II Local GAAP	31-Dec-2007 Euro (Millions) Basel I Local GAAP	31-Dec-2006 Euro (Millions) Basel I Local GAAP
<b>Analyst-Adjusted - Consolidated Financials</b>					
<b>BALANCE SHEET</b>					
<b>ASSETS</b>					
Cash and Balances with Central Bank	27,369	31,572	32,986	27,729	25,698
Due from Other Financial Institutions	544,914	615,887	731,111	788,376	693,883
Securities and Investments	586,244	621,286	596,573	604,483	573,294
Loans to Customers - Net of Unearned Income and Allowance for Loan Losses	1,214,282	1,200,468	1,207,665	1,160,191	1,111,828
Loans to Customers (Gross)	-	-	-	-	1,142,403
Allowance for loan losses	-	-	-	-	30,575
Fixed Assets, net	12,610	12,993	13,389	13,946	14,729
Investments in unconsolidated subs & affiliates	17,688	19,687	25,285	24,698	41,812
Other assets - Total	198,588	80,889	77,959	63,935	57,775
<b>Total Assets</b>	<b>2,601,695</b>	<b>2,582,781.99</b>	<b>2,684,968</b>	<b>2,683,358</b>	<b>2,519,019</b>
<b>LIABILITIES</b>					
Due to Customers	1,164,694	1,160,142	1,146,259	1,067,457	1,025,738
Due to Other Financial Institutions	598,468	649,465	754,127	829,671	737,121
Senior Bonds, Notes and Other Long-term Borrowings	403,056	458,370	482,621	496,983	480,092
Subordinated Debt	43,735	47,255	51,645	55,009	52,234
Other liabilities - Total	269,502	140,872	135,009	124,188	118,844
<b>Total Liabilities</b>	<b>2,479,455</b>	<b>2,456,103.99</b>	<b>2,569,661</b>	<b>2,573,308</b>	<b>2,414,029</b>
<b>CAPITAL/SHAREHOLDERS' EQUITY</b>					
Minority interest	-	0	-	-	-
Retained earnings - Total	-	-	-	-	104,990
<b>Total Capital / Shareholders' Equity</b>	<b>122,240</b>	<b>126,678</b>	<b>115,307</b>	<b>110,050</b>	<b>104,990</b>
<b>Total Liabilities, Mezzanine and Shareholders' Equity</b>	<b>2,601,695</b>	<b>2,582,782</b>	<b>2,684,968</b>	<b>2,683,358</b>	<b>2,519,019</b>
<b>INCOME STATEMENT</b>					
Interest income	93,812	109,311	148,834	145,665	130,938
Interest expense	58,970	74,267	114,774	112,887	97,490
<b>Net interest income (expense)</b>	<b>34,842</b>	<b>35,044</b>	<b>34,060</b>	<b>32,778</b>	<b>33,448</b>
Loan Loss Provisions	6,172	10,592	13,530	6,571	3,918
Non-interest income	8,205	8,658	7,857	7,922	10,719
Net Fees and commissions	7,357	6,948	8,098	8,296	8,050
Income from Trading Activities	517	1,079	-1,478	-1,576	1,186
Other income	331	631	1,237	1,202	1,483
<b>Total non-interest income</b>	<b>8,205</b>	<b>8,658</b>	<b>7,857</b>	<b>7,922</b>	<b>10,719</b>
Other operating (non-interest) expense	26,022	26,936	26,917	27,282	27,369
Personnel Expense	15,006	15,899	15,553	15,425	16,285
Administrative and Other Operating Expense	11,016	11,037	11,364	11,857	11,084

## Sparkassen-Finanzgruppe

Analyst-Adjusted - Consolidated Financials	31-Dec-2010 Euro (Millions) Basel II Local GAAP	31-Dec-2009 Euro (Millions) Basel II Local GAAP	31-Dec-2008 Euro (Millions) Basel II Local GAAP	31-Dec-2007 Euro (Millions) Basel I Local GAAP	31-Dec-2006 Euro (Millions) Basel I Local GAAP
Non-recurring charges / unusual items (as reported)	2,157	6,463	5,124	2,159	2,297
Total other operating expenses / charges	28,179	33,399	32,041	29,441	29,666
Pre-tax income (loss)	8,696	-289	-3,654	4,688	10,583
Income tax (benefit) expense	2,665	2,571	1,747	1,959	2,907
Net Profit (Loss) After-tax Before Unusual Items	6,031	-2,860	-5,401	2,729	7,676
Net income (loss)	6,031	-2,860	-5,401	2,729	7,676
Cumulative effect of Moody's unusual items adjustments to net income (loss), net of tax	-	-	0	0	0
Net income (loss) after unusual items adjustments	6,031	-2,860	-5,401	2,729	7,676
Income available / (Loss attributable) to common shareholders	6,031	-2,860	-5,401	2,729	7,676

## RATIOS

## ASSET QUALITY

Loan Loss Provisions / Gross Loans	-	-	-	-	0.34%
Loan Loss Provisions / Pre-Provision Profit	36.25%	63.18%	90.20%	48.97%	23.32%
Allowance for Loan Losses / Gross Loans	-	-	-	-	2.68%
Problem Loans & Leases / Gross Loans	-	-	-	-	4.87%
Problem Loans & Leases / Shareholders' Equity + Loan Loss Reserves	-	-	-	-	41.01%

## PROFITABILITY

Return on Average Assets (after Tax before Unusual Items)	0.23%	-0.11%	-0.20%	0.10%	0.30%
Return on Average Shareholders' Equity (after Tax before Unusual Items)	4.85%	-2.36%	-4.79%	2.54%	7.31%
Net Income / Average RWA - Basel I	-	-	-	0.22%	0.63%
Net Income / Average RWA - Basel II	0.54%	-0.24%	-0.43%	-	-
Pre-Provision Income / Average RWA - Basel I	-	-	-	1.08%	1.38%
Pre-Provision Income / Average RWA - Basel II	1.53%	1.38%	1.20%	-	-

## CAPITALIZATION

Tier 1 Capital / RWA - Basel I	-	-	-	8.50%	8.36%
Tier 1 Capital / RWA - Basel II	10.93%	10.12%	8.82%	-	-
Total Capital / RWA - Basel I	-	-	-	13.24%	13.22%
Total Capital / RWA - Basel II	16.00%	14.86%	13.47%	-	-
TCE / RWA - Basel I	-	-	-	-	8.65%
Shareholders' Equity / Total Assets	4.70%	4.90%	4.29%	4.10%	4.17%

## EFFICIENCY

Cost / Income Ratio	60.45%	61.64%	64.21%	67.03%	61.97%
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## LIQUIDITY AND FUNDING

(Market Funds - Liquid Assets) / Total Assets	18.18%	19.65%	19.53%	21.08%	21.83%
Total Liquid Assets / Total Assets	22.00%	25.07%	28.46%	30.41%	28.57%

Source: Moody's

## Moody's Related Research

### Credit Opinion:

- » [Sparkassen-Finanzgruppe](#)

### Banking System Outlook:

- » [Germany, October 2010 \(126318\)](#)

### Banking Statistical Supplements:

- » [Germany, October 2009 \(120358\)](#)

### Bank Credit Strength Assessment:

- » [Solidarity and Strength of Public-Sector Banks in Germany Continue to Underpin Their credit Quality, March 2006 \(97005\)](#)
- » [Assessing Germany's Public Sector Banks and Their Cross-Sector Support Mechanisms, December 2004 \(90338\)](#)

### Special Comments:

- » [Why Global Bank Ratings Are Likely To Decline In 2012, January 2012 \(139205\)](#)
- » [Euro Area Debt Crisis Weakens Bank Credit Profiles, January 2012 \(137981\)](#)
- » [European Banks: How Moody's Analytical Approach Reflects Evolving Challenges, January 2012 \(139207\)](#)
- » [Financial Stability Report Highlights Credit-Negative Pressure Points for German Banks, November 2011 \(137520\)](#)
- » [Moody's Reduces Support Assumptions for German Landesbanken, November 2011 \(137301\)](#)
- » [Banks' Standalone Credit Strength Unlikely to Return to Pre-Crisis Levels, Even under Basel 3, May 2011 \(132703\)](#)
- » [German Bank Restructuring Act Reduces Systemic Support for Subordinated Debtholders, February 2011 \(131128\)](#)
- » [Proposed Change in DekaBank Ownership is Positive for Germany's Public Sector Banks, January 2011 \(129968\)](#)
- » [Adoption of Private Sector Charter Is Credit Positive for German Landesbanken, June 2010 \(125790\)](#)
- » [Moody's Approach to Estimating German Banks' Credit Losses, November 2009 \(120589\)](#)
- » [Calibrating Bank Ratings in the Context of the Global Financial Crisis, February 2009 \(114705\)](#)
- » [Updated Analytical Rationale for the Future Non-Guaranteed ratings of German Landesbanken, January 2005 \(91293\)](#)
- » [German Public-Sector Banks After July 2005: Focus Shifts To Support And Solidarity Within The Sector, July 2004 \(87549\)](#)

**Rating Methodologies:**

- » [Moody's Guidelines for Rating Bank Hybrid Securities and Subordinated Debt, November 2009, \(120307\)](#)
- » [Incorporation of Joint-Default Analysis into Moody's Bank Ratings: A Refined Methodology, March 2007 \(102639\)](#)
- » [Bank Financial Strength Ratings: Global Methodology, February 2007 \(102151\)](#)

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



## Appendix: Members of the joint-liability scheme of S-Finanzgruppe (Haftungsverbund) as of January 2012

**Please note:** In assigning the ratings to S-Finanzgruppe, Moody's assesses the group as if it acted as a single entity, basing the analysis on the group's aggregated credit profile. The BFSR and CFR do not apply to individual members of the group, but only to the creditworthiness of the group as a whole. Please note that as of 2 January 2012 the number of savings banks has reduced to 423 from 429 at the end of 2010 due to recent mergers.

### Sparkassen

1	Bezirkssparkasse Reichenau	142	Sparkasse Dachau	282	Sparkasse Vorpommern
2	Bordesholmer Sparkasse AG	143	Sparkasse Deggendorf	283	Sparkasse Waldeck-Frankenberg
3	Erzgebirgssparkasse	144	Sparkasse der Homburgischen Gemeinden	284	Sparkasse Werl
4	Förde Sparkasse	145	Sparkasse der Stadt Iserloh	285	Sparkasse Werra-Meißner
5	Frankfurter Sparkasse	347a	Sparkasse der Stadt Stadtlohn and Sparkasse Westmünsterland merged to Sparkasse Westmünsterland	286	Sparkasse Weserbergland
6	Hamburger Sparkasse	146	Sparkasse der Stadt Straelen	287	Sparkasse Oder-Spree
7	Harzsparkasse	294a	Sparkasse Detmold and Sparkasse Paderborn merged to Sparkasse Paderborn-Detmold	288	Sparkasse Offenburg/Ortenau
8	Herner Sparkasse	147	Sparkasse Dieburg	289	Sparkasse Olpe-Drolshagen-Wenden
9	Hohenzollerische Landesbank Kreissparkasse Sigmaringen	148	Sparkasse Dillenburg	290	Sparkasse Osnabrück
10	Kasseler Sparkasse	149	Sparkasse Dinslaken-Voerde-Hünxe	291	Sparkasse Osterode am Harz
11	Kreis- und Stadtparkasse Dillingen a. d. Donau	150	Sparkasse Donauwörth	292	Sparkasse Ostprignitz-Ruppin
12	Kreis- und Stadtparkasse Dinkelsbühl	151	Sparkasse Donnersberg	293	Sparkasse Ostunterfranken
13	Kreis- und Stadtparkasse Erding-Dorfen	152	Sparkasse Dortmund	294	Sparkasse Detmold and Sparkasse Paderborn merged to Sparkasse Paderborn-Detmold
14	Kreis- und Stadtparkasse Kaufbeuren	153	Sparkasse Duderstadt	295	Sparkasse Parchim-Lübz
15	Kreis- und Stadtparkasse Speyer	154	Sparkasse Duisburg	296	Sparkasse Passau
16	Kreis- und Stadtparkasse Wasserburg am Inn	155	Sparkasse Düren	297	Sparkasse Pfaffenhofen
17	Kreissparkasse Ahrweiler	156	Sparkasse Eichstätt	298	Sparkasse Pforzheim Calw
18	Kreissparkasse Altenkirchen	157	Sparkasse Einbeck	299	Sparkasse Pfullendorf-Meißkirch
19	Kreissparkasse Altötting-Mühlendorf	158	Sparkasse Elbe-Elster	300	Sparkasse Porta Westfalica
20	Kreissparkasse Anhalt-Bitterfeld	159	Sparkasse Elmshorn	301	Sparkasse Prignitz
3a	Kreissparkasse Aue-Schwarzenberg, Sparkasse Erzgebirge and Sparkasse Mittleres Erzgebirge merged to Erzgebirgssparkasse	160	Sparkasse Emden	302	Sparkasse Radevormwald-Hückerwagen
21	Kreissparkasse Augsburg	161	Sparkasse Ermsland	303	Sparkasse Rastatt-Gernsbach
22	Kreissparkasse Bautzen	162	Sparkasse Engen-Gottmadingen	304	Sparkasse Regensburg
23	Kreissparkasse Bersenbrück	163	Sparkasse Ennepetal-Breckerfeld	305	Sparkasse Rhein Neckar Nord
24	Kreissparkasse Biberach	164	Sparkasse Erlangen	306	Sparkasse Rhein-Haardt
25	Kreissparkasse Birkenfeld	165	Sparkasse Erwitte-Anröchte	307	Sparkasse Rhein-Nahe
26	Kreissparkasse Bittburg-Prüm	3b	Sparkasse Erzgebirge, Kreissparkasse Aue-Schwarzenberg and Sparkasse Mittleres Erzgebirge merged to Erzgebirgssparkasse	308	Sparkasse Rietberg
27	Kreissparkasse Böblingen	166	Sparkasse Essen	309	Sparkasse Rosenheim-Bad Aibling
28	Kreissparkasse Börde	167	Sparkasse Finnentrop	310	Sparkasse Rotenburg-Bremervörde
29	Kreissparkasse Döbeln	168	Sparkasse Forchheim	311	Sparkasse Rothenburg
30	Kreissparkasse Düsseldorf	169	Sparkasse Freiburg-Nördlicher Breisgau	312	Sparkasse Rottal-Inn
xx	Kreissparkasse Ebersberg and Kreissparkasse München Starnberg merged to Kreissparkasse München Starnberg Ebersberg	170	Sparkasse Freising	313	Sparkasse Saarbrücken
31	Kreissparkasse Eichsfeld	171	Sparkasse Freyung-Grafenau	314	Sparkasse Salem-Heiligenberg
32	Kreissparkasse Esslingen-Nürtingen	172	Sparkasse Fröndenberg	315	Sparkasse Schaumburg
33	Kreissparkasse Euskirchen	173	Sparkasse Fulda	316	Sparkasse Schaeßel
34	Kreissparkasse Freudenstadt	174	Sparkasse Fürstenfeldbruck	317	Sparkasse Schönaun-Todtnau
35	Kreissparkasse Garmisch-Partenkirchen	175	Sparkasse Fürth	318	Sparkasse Schoppeim-Zell
36	Kreissparkasse Gelnhausen	176	Sparkasse Gelsenkirchen	319	Sparkasse Schwäbisch Hall - Crailsheim
37	Kreissparkasse Göppingen	177	Sparkasse Gengenbach	320	Sparkasse Schwarzwald-Baar
38	Kreissparkasse Gotha	178	Sparkasse Gera-Greiz	321	Sparkasse Schweinfurt
39	Kreissparkasse Grafschaft Bentheim zu Nordhorn	179	Sparkasse Germersheim-Kandel	322	Sparkasse Siegen
40	Kreissparkasse Grafschaft Diepholz	180	Sparkasse Geseke	323	Sparkasse Singen-Radolfzell
41	Kreissparkasse Groß-Gerau	181	Sparkasse Gießen	324	Sparkasse Soest
42	Kreissparkasse Halle	182	Sparkasse Gifhorn-Wolfsburg	325	Sparkasse Sonneberg
43	Kreissparkasse Heidenheim	183	Sparkasse Gladbeck	326	Sparkasse Spree-Neiße
44	Kreissparkasse Heilbronn	184	Sparkasse Goslar/Harz	327	Sparkasse Sprockhövel
45	Kreissparkasse Heinsberg	185	Sparkasse Göttingen	328	Sparkasse St. Blasien
46	Kreissparkasse Herzogtum Lauenburg	186	Sparkasse Gronau	329	Sparkasse Stade-Altes Land
47	Kreissparkasse Hildburghausen	187	Sparkasse Grünberg	330	Sparkasse Starkenburg
48	Kreissparkasse Höchststadt a. d. Aisch	188	Sparkasse Gummersbach-Bergneustadt	331	Sparkasse Staufeu-Breisach
49	Kreissparkasse in Walsrode	189	Sparkasse Günzburg-Krumbach	332	Sparkasse Stockach
50	Kreissparkasse Kaiserslautern	190	Sparkasse Gütersloh	333	Sparkasse Südholstein
51	Kreissparkasse Kelheim	191	Sparkasse Hagen	334	Sparkasse Südliche Weinstraße in Landau
52	Kreissparkasse Köln	192	Sparkasse Hamm	335	Sparkasse Südwestpfalz
53	Kreissparkasse Kusel	193	Sparkasse Hanau	336	Sparkasse Tauberfranken
54	Kreissparkasse Limburg	194	Sparkasse Hanauerland	337	Sparkasse Trier
55	Kreissparkasse Ludwigsburg	195	Sparkasse Hannover	338	Sparkasse Uckermark

## Sparkassen

56	Kreissparkasse Mayen	196	Sparkasse Harburg-Buxtehude	339	Sparkasse Uecker-Randow
57	Kreissparkasse Melle	197	Sparkasse Haslach-Zell	340	Sparkasse Uelzen Lüchow-Dannenberg
58	Kreissparkasse Miesbach-Tegernsee	198	Sparkasse Hattingen	341	Sparkasse Ulm
59	Kreissparkasse München Starnberg and Kreissparkasse Ebersberg merged to Kreissparkasse München Starnberg Ebersberg	199	Sparkasse Heidelberg	342	Sparkasse Unna
60	Kreissparkasse Nordhausen	200	Sparkasse Hennstedt-Wesselburen	343	Sparkasse Unstrut-Hainich
61	Kreissparkasse Northheim	201	Sparkasse Hilden-Ratingen-Velbert	344	Sparkasse Vest Recklinghausen
62	Kreissparkasse Ostalb	202	Sparkasse Hildesheim	345	Sparkasse Vogtland
63	Kreissparkasse Osterholz	203	Sparkasse Hochfranken	346	Landsparkasse Schenefeld and Sparkasse Westholstein merged to Sparkasse Westholstein
64	Kreissparkasse Peine	204	Sparkasse Hochrhein	347	Sparkasse der Stadt Stadtlöh and Sparkasse Westmünsterland merged to Sparkasse Westmünsterland
65	Kreissparkasse Ravensburg	205	Sparkasse Hochsauerland	348	Sparkasse Wetzlar
66	Kreissparkasse Reutlingen	206	Sparkasse Hochschwarzwald	349	Sparkasse Wilhelmshaven
67	Kreissparkasse Rhein-Hunsrück	207	Sparkasse Hohenlohekreis	350	Sparkasse Witten
68	Kreissparkasse Rhein-Pfalz	208	Sparkasse Hohenwestedt	351	Sparkasse Wittenberg
69	Kreissparkasse Rottweil	209	Sparkasse Holstein	352	Sparkasse Wittgenstein
70	Kreissparkasse Rügen	210	Sparkasse im Kreis Herford	353	Sparkasse Wolfach
71	Kreissparkasse Saale-Orla	211	Sparkasse im Landkreis Cham	354	Sparkasse Worms-Alzey-Ried
72	Kreissparkasse Saalfeld-Rudolstadt	212	Sparkasse im Landkreis Neustadt a. d. Aisch - Bad Windsheim	355	Sparkasse Zollernalb
73	Kreissparkasse Saarlouis	213	Sparkasse im Landkreis Schwandorf	356	Sparkasse zu Lübeck AG
74	Kreissparkasse Saarpfalz	214	Sparkasse Ingolstadt	357	Sparkasse Zwickau
75	Kreissparkasse Schlüchtern	215	Sparkasse Jena-Saale-Holzland	358	Sparkasse-Regen-Viechtach
76	Kreissparkasse Schongau	216	Sparkasse Jerichower Land	359	Stadt- und Kreis-Sparkasse Darmstadt
77	Kreissparkasse Schwalm-Eder	217	Sparkasse Kamen	360	Stadt- und Kreissparkasse Moosburg a. d. Isar
78	Kreissparkasse Soltau	218	Sparkasse Karlsruhe Ettlingen	361	Städtische Sparkasse Offenbach am Main
79	Kreissparkasse St. Wendel	219	Sparkasse Kierspe-Meinerzhagen	362	Städtische Sparkasse zu Schwelm
80	Kreissparkasse Stade	220	Sparkasse Kleve	363	Stadtsparkasse Aichach
81	Kreissparkasse Steinfurt	221	Sparkasse Koblenz	364	Stadtsparkasse Augsburg
82	Kreissparkasse Stendal	222	Sparkasse Köln/Bonn	365	Stadtsparkasse Bad Honnef
83	Kreissparkasse Syke	223	Sparkasse Kraichgau	366	Stadtsparkasse Bad Oeynhausen
84	Kreissparkasse Traunstein-Trostberg	224	Sparkasse Krefeld	367	Stadtsparkasse Bad Pyrmont
85	Kreissparkasse Tübingen	225	Sparkasse Kulmbach-Kronach	368	Stadtsparkasse Bad Sachsa
86	Kreissparkasse Tuttingen	226	Sparkasse Landsberg-Dießen	369	Stadtsparkasse Barsinghausen
87	Kreissparkasse Verden	227	Sparkasse Landshut	370	Stadtsparkasse Blomberg/Lippe
88	Kreissparkasse Vulkaneifel	228	Sparkasse Langen-Seligensstadt	371	Stadtsparkasse Bocholt
89	Kreissparkasse Weilburg	229	Sparkasse Laubach-Hungen	372	Stadtsparkasse Borken
90	Kreissparkasse Wesermünde-Hadeln	230	Sparkasse LeerWittmund	373	Stadtsparkasse Burgdorf
91	Kreissparkasse Westerwald	231	Sparkasse Leipzig	374	Stadtsparkasse Cuxhaven
92	Kreissparkasse Wiedenbrück	232	Sparkasse Lemgo	375	Stadtsparkasse Delbrück
93	Kyffhäuserparkasse Artern-Sondershausen	233	Sparkasse Leverkusen	376	Stadtsparkasse Dessau
94	Landessparkasse zu Oldenburg	234	Sparkasse Lippstadt	377	Stadtsparkasse Düsseldorf
346a	Landsparkasse Schenefeld and Sparkasse Westholstein merged to Sparkasse Westholstein	235	Sparkasse Lörrach-Rheinfelden	378	Stadtsparkasse Emmerich-Rees
95	Mittelbrandenburgische Sparkasse in Potsdam	236	Sparkasse Lüdenscheid	379	Stadtsparkasse Felsberg
96	Müritz-Sparkasse	237	Sparkasse Lüneburg	380	Stadtsparkasse Freudenberg
97	Nassauische Sparkasse (NASPA)	238	Sparkasse Lünen	381	Stadtsparkasse Gevelsberg
98	Nord-Ostsee Sparkasse	239	Sparkasse Mainfranken Würzburg	382	Stadtsparkasse Grebenstein
99	Ostächsische Sparkasse in Dresden	240	Sparkasse Mainz	383	Stadt-Sparkasse Haan
100	OstseeSparkasse Rostock	241	Sparkasse Mansfeld-Südharz	384	Stadtsparkasse Haltern am See
101	Rhön-Rennsteig-Sparkasse	242	Sparkasse Marburg-Biedenkopf	385	Stadtsparkasse Hameln
102	Saalesparkasse	243	Sparkasse Markgräflerland	386	Stadtsparkasse Herdecke
103	Salzlandsparkasse	244	Sparkasse Märkisches Sauerland Hemer-Menden	387	Stadtsparkasse Hilchenbach
104	Spar- und Leihkasse zu Bredstedt AG	245	Sparkasse Märkisch-Oderland	388	Stadtsparkasse Kaiserslautern
105	Sparkasse Aachen	246	Sparkasse Mecklenburg-Nordwest	389	Stadt-Sparkasse Langenfeld
106	Sparkasse Allgäu	247	Sparkasse Mecklenburg-Schwerin	390	Stadtsparkasse Lengerich
107	Sparkasse Altenburger Land	248	Sparkasse Mecklenburg-Strelitz	391	Stadtsparkasse Magdeburg
108	Sparkasse Altmark West	249	Sparkasse Meißen	392	Stadtsparkasse Mönchengladbach
109	Sparkasse am Niederrhein	250	Sparkasse Memmingen-Lindau-Mindelheim	393	Stadtsparkasse München
110	Sparkasse Amberg-Weilbach	251	Sparkasse Merzig-Wadern	394	Stadtsparkasse Oberhausen
111	Sparkasse Arnberg-Sundern	252	Sparkasse Meschede	395	Stadtsparkasse Rahden
112	Sparkasse Arnstadt-Ilmenau	253	Sparkasse Miltenberg-Obernburg	396	Stadtsparkasse Remscheid
113	Sparkasse Aschaffenburg-Alzenau	254	Sparkasse Minden-Lübbecke	397	Stadtsparkasse Rheine
114	Sparkasse Attendorn-Lennestadt-Kirchhundem	255	Sparkasse Mittelfranken-Süd	398	Stadtsparkasse Schmallenberg
115	Sparkasse Aurich-Norden	256	Sparkasse Mittelholstein AG	399	Stadtsparkasse Schrobenhausen
116	Sparkasse Bad Hersfeld-Rotenburg	257	Sparkasse Mittelmosel - Eifel Mosel Hunsrück	400	Stadtsparkasse Schwalmstadt
117	Sparkasse Bad Kissingen	258	Sparkasse Mittelsachsen	401	Stadtsparkasse Schwedt
118	Sparkasse Bad Neustadt a. d. Saale	259	Sparkasse Mittelhüringen	402	Stadtsparkasse Schwerte
119	Sparkasse Bad Tölz-Wolfratshausen	3c	Sparkasse Erzgebirge, Kreissparkasse Aue-Schwarzenberg and Sparkasse Mittleres Erzgebirge merged to Erzgebirgssparkasse	403	Stadt-Sparkasse Solingen
120	Sparkasse Baden-Baden Gaggenau	260	Sparkasse Muldentale	404	Stadtsparkasse Versmold
121	Sparkasse Bamberg	261	Sparkasse Mülheim an der Ruhr	405	Stadtsparkasse Völklingen
122	Sparkasse Barnim	262	Sparkasse Münden	406	Stadtsparkasse Wedel
123	Sparkasse Battenberg	263	Sparkasse Münsterland Ost	407	Stadtsparkasse Wermelskirchen
124	Sparkasse Bayreuth	264	Sparkasse Neckartal-Odenwald	408	Stadtsparkasse Werne

## Sparkassen

125	Sparkasse Beckum-Wadersloh	265	Sparkasse Neubrandenburg-Demmin	409	Stadtsparkasse Wetter
126	Sparkasse Bensheim	266	Sparkasse Neuburg-Rain	410	Stadtsparkasse Wunstorf
127	Sparkasse Berchtesgadener Land	267	Sparkasse Neumarkt i.d.OPf.-Parsberg	411	Stadtsparkasse Wuppertal
128	Sparkasse Bergkamen-Bönen	268	Sparkasse Neunkirchen	412	SWN Kreissparkasse Waiblingen
129	Sparkasse Bielefeld	269	Sparkasse Neuss	413	TaunusSparkasse
130	Sparkasse Bochum	270	Sparkasse Neu-Ulm - Illtertissen	414	Verbandssparkasse Goch-Kevelaer-Weeze
131	Sparkasse Bodensee	271	Sparkasse Neuwied	415	Verbands-Sparkasse Wesel
132	Sparkasse Bonndorf-Stühlingen	272	Sparkasse Niederbayern-Mitte	416	VerbundSparkasse Emsdetten-Ochtrup
133	Sparkasse Bottrop	273	Sparkasse Niederlausitz	417	Vereinigte Sparkasse im Märkischen Kreis
134	Sparkasse Bremen	274	Sparkasse Nienburg	418	Vereinigte Sparkassen Eschenbach i. d. Opf.
135	Sparkasse Bremerhaven	275	Sparkasse Nördlingen	419	Vereinigte Sparkassen Gunzenhausen
136	Sparkasse Bühl	276	Sparkasse Nürnberg	420	Vereinigte Sparkassen im Landkreis Weilheim i. OB
137	Sparkasse Burbach-Neunkirchen	277	Sparkasse Oberhessen	421	Vereinigte Sparkassen Stadt und Landkreis Ansbach
138	Sparkasse Burgenlandkreis	278	Sparkasse Oberlausitz-Niederschlesien	422	Wartburg-Sparkasse
139	Sparkasse Celle	279	Sparkasse Oberpfalz Nord	423	Zweckverbandssparkasse Höxter
140	Sparkasse Chemnitz	280	Sparkasse Odenwaldkreis		
141	Sparkasse Coburg-Lichtenfels	281	Sparkasse Vorderpfalz Ludwigshafen a. Rh. - Schifferstadt		

## Landesbanken

DekaBank Deutsche Girozentrale

HSH Nordbank AG

Bremer Landesbank Kreditanstalt Oldenburg - Girozentrale

Nord/LB Norddeutsche Landesbank Girozentrale

Landesbank Berlin AG

WestLB AG

Landesbank Hessen-Thüringen Girozentrale

Landesbank Saar

Landesbank Baden-Württemberg

Bayerische Landesbank

## Bausparkassen

LBS Bausparkasse Schleswig-Holstein-Hamburg AG

LBS Bayerische Landesbausparkasse

LBS Landesbausparkasse Baden-Württemberg

LBS Landesbausparkasse Bremen AG

LBS Landesbausparkasse Rheinland Pfalz

LBS Landesbausparkasse Hessen-Thüringen

LBS Landesbausparkasse Saar

LBS Norddeutsche Landesbausparkasse Berlin - Hannover

LBS Ostdeutsche Landesbausparkasse AG

LBS Westdeutsche Landesbausparkasse

## Other

Weberbank Aktiengesellschaft

Westdeutsche ImmobilienBank AG

S Broker AG & Co. KG

DEG Deutsche Investitions- und Entwicklungsgesellschaft mbH

Berlin-Hannoversche Hypothekenbank Aktiengesellschaft

Deutsche Hypothekenbank (Actien-Gesellschaft)

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