FitchRatings

Insurance
Life Insurers
EMEA/Bermuda

Athora Holding Ltd.

And Operating Subsidiaries

Key Rating Drivers

Improved Company Profile: Athora Group entered into the Italian life insurance market in 2021 through the announced acquisition of Amissima Vita S.p.A (Amissima), a mid-sized insurer. This planned acquisition would further improve Athora's geographical diversification. Athora is also becoming active in external reinsurance. Fitch Ratings now regards the group's diversification as 'favourable', up from 'moderate'.

We regard Athora's business profile as 'favourable' compared with other Dutch and Western European life insurers. Athora has a leading market position and franchise within the European life consolidator market. With total assets of EUR81 billion at end-2021, Athora's operating scale is favourable compared to other European life insurance groups.

Strong Financial Performance: We expect Athora Netherlands N.V.'s (Athora NL) profitability to benefit from the implementation of Athora's strategic asset allocation, favouring investments with higher expected returns. We expect Athora to achieve a Fitch-calculated net income return on equity (ROE) of at least 8% in 2023 – although we expect that 2022 will be a transition year with an ROE of 5%–8%.

Athora's ROE fell to 3% in 2021 (2020: 28%). However, its Fitch-calculated pre-tax operating profit ROE was more resilient at 12% in 2021 (2020: 25%). Underlying profitability was relatively stable in 2021 because 2020 return figures benefitted from large one-offs and a low starting equity position for 2020, while 2021 net income had a high tax burden.

Very Strong Capitalisation and Leverage: Fitch expects capitalisation to decline slightly as the group grows its business, but that the group's Prism Factor-Based Capital Model (Prism FBM) score will remain at least 'Very Strong'. Athora's Prism FBM score was 'Extremely Strong' at end-2021.

We expect Athora's financial leverage ratio (FLR) to slightly weaken to around 25% at end-2022 (end-2021: 24%); we expect that the proposed issue of EUR500 million will replace the outstanding USD575 million Tier 2 subordinated debt on which Athora launched a tender offer in May 2022. Subject to the level of tender acceptance Fitch expects the remainder of this outstanding issue to be called in November 2022.

High Investment Risk: Fitch regards Athora's investment risk as high, but manageable. Most of Athora's investments are holdings of investment-grade corporate and sovereign bonds. Athora also invests in private credit assets, alternative investments and commercial mortgage loans.

Rating Sensitivities

Improved Financial Performance: A sustained ROE of more than 10% while maintaining at least a 'Very Strong' Prism FBM score could result in an upgrade. However, we regard this as unlikely in the medium term.

Weaker Capitalisation: A fall of the Prism FBM score to 'Strong' could result in a downgrade.

Higher Leverage: A sustained increase in the FLR above 30% could lead to a downgrade.

Weakened Profitability: A sustained ROE below 5% could result in a downgrade.

Ratings

Athora Holding Ltd.	
Long-Term IDR	A-
Athora Life Re Ltd.	
Insurer Financial Strength	A
Athora Ireland plc	
Insurer Financial Strength	A
Athora Netherlands N. V.	
Long-Term IDR	A-
Senior unsecured notes	BBB+
Subordinated T2 notes	BBB-
Junior subordinated RT1 notes	BB+
SRLEV N. V.	
Insurer Financial Strength	A
Long-Term IDR	A-
Grandfathered subordinated RT1 notes	BBB

Outlooks

Long-Term IDRs	Stable
Insurer Financial Strength Ratings	Stable

Financial Data

Athora Holding Ltd.

(EURm)	31 Dec 21	31 Dec 20
Total assets	81,491	86,461
Total equity and reserves	4,570	4,009
Net income	128	641
Pre-tax operating profit	521	579
Debt (including hybrids)	2,437	2,195

Source: Fitch Ratings;Athora Holding Ltd.

Applicable Criteria

Insurance Rating Criteria (November 2021)

Related Research

Fitch Ratings 2022 Outlook: Dutch Insurance (December 2021)

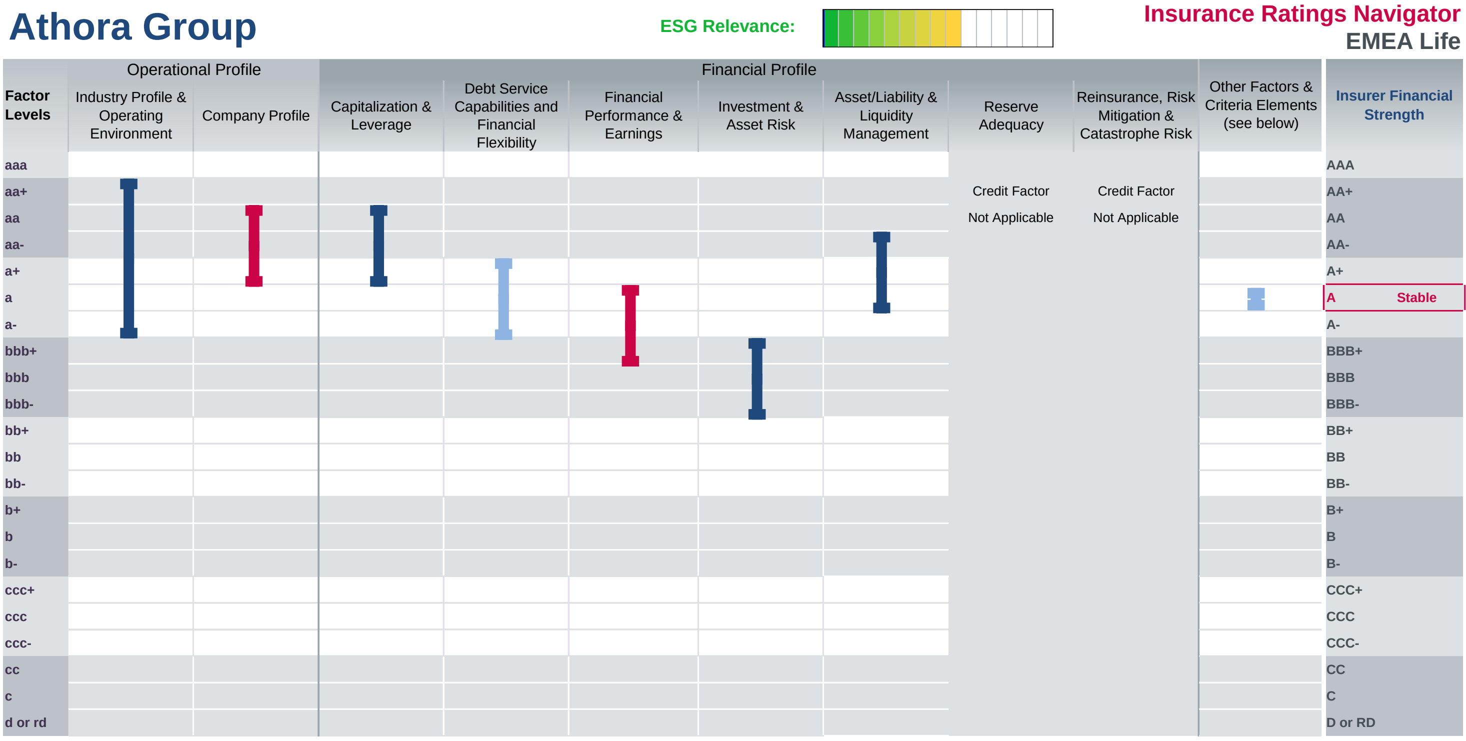
Sound Capitalisation Continues to Underpin Belgian and Dutch Insurer Ratings (April 2022)

Analysts

Christoph Schmitt
+49 69 768076 121
christoph.schmitt@fitchratings.com

Willem Loots
+44 20 3530 1808
willem.loots@fitchratings.com

Key Credit Factors – Scoring Summary



Other Factors & Criteria Elements				
Provisional Insurer Financial Strength Rating				**A**
Non-Insurance Attributes	Positive	**Neutral**	Negative	+0
Ownership / Group Support	Positive	**Neutral**	Negative	+0
Transfer & Convertibility / Country Ceiling	Yes	**No**	NR	+0
Insurer Financial Strength Rating			Final:	**A**
IFS Recovery Assumption	**Good**			-1
Issuer Default Rating (IDR)			Final:	**A-**

Bar Chart Legend

Vertical Bars = Range of Rating Factor

Bar Colors = Relative Importance

- Higher Influence
- Moderate Influence
- Lower Influence

Bar Arrows = Rating Factor Outlook

⇧ Positive ⇩ Negative

⇳ Evolving ◻ Stable

Latest Developments

- Athora's Insurer Financial Strength (IFS) was upgraded to 'A' with a Stable Outlook on 9 May 2022. The upgrade reflects our expectation of an ROE of more than 8%, combined with an improved view on company profile, which we now regard as 'favourable' instead of 'moderate'.
- The increase in the company profile score to 'aa-' from 'a+' reflects our improved view on business profile. We consider that Athora has a leading position and franchise in the European life insurance consolidator market. This is reflected in the announced acquisition of the Italian life insurer Amissima in 2021, which improves Athora's geographical diversification further.
- We increased the financial performance score to 'a-' from 'bbb+'. We consider Athora to have already achieved strong progress in profitability. We expect that Athora will achieve an ROE of at least 8% for 2023, although we expect that 2022 will be a transition year with an ROE of 5%–8%.

Peer Comparison

Click here for a report that shows a comparative peer analysis of key credit factor scoring.

Industry Profile and Operating Environment (IPOE)

Click here for a link to a report that summarises the main factors driving the above IPOE score.

Company Profile

Company Profile Scoring Summary

	Assessment	Sub-score/impact
Business profile assessment	Favourable	aa-
Corporate governance assessment	Favourable	0
Company profile factor score		aa-

Source: Fitch Ratings

Fitch scores Athora's company profile at 'aa-' under its credit factor scoring guidelines. This considers Athora's business profile score as favourable, which is unadjusted given its 'favourable' corporate governance assessment.

Business Profile

Fitch ranks Athora's business profile as favourable compared to that of all other Dutch and Western European life insurers, due to its favourable competitive positioning. Given this ranking, Fitch scores Athora's business profile at 'aa-' under its credit factor scoring guidelines.

Athora is a European life consolidator. The group's holding company is domiciled in Bermuda. We therefore assess the group's business profile based on a comparison with other European life insurance groups, especially Dutch groups. This is due to Athora NL's dominating influence on Athora's operating scale: Athora NL contributed EUR64 billion to Athora's EUR81 billion total assets at end-2021.

We view the Athora group as having a 'favourable' business profile versus those groups, reflecting favourable competitive positioning (including operating scale), moderate business risk profile and favourable diversification, leading to an 'aa-' business profile score.

Fitch believes that Athora has a leading position and franchise in the European life consolidator market. This is reflected in Athora having entered many large European life insurance markets. In 2021 Athora announced the acquisition of the Italian life insurer Amissima, after having also entered markets in the Netherlands, Belgium, Ireland and Germany in recent years.

Fitch views the Athora group as having a moderate business risk profile. This is because of the group's focus on traditional life insurance products with fairly high guarantees and fairly high reinvestment risk, and because of the risks arising from the operational integration of acquisitions into the group.

Athora group's diversification is favourable compared to other European life insurance groups. Athora's geographical diversification is increasing, with operations in the Netherlands, Belgium, Italy, Ireland and Germany, which offsets the relatively low business line diversification. However, due to the various markets, there is a better product diversification within the different lines of business for Athora compared to peers with a focus on one country.

Corporate Governance – Moderate/Favourable

Corporate governance and management are moderate/favourable, and in line with market standards for developed markets and as such are adequate and neutral to the ratings.

Ownership

Fitch regards ownership as neutral to Athora's ratings.

Athora is approximately 16% owned by Athene Holding Ltd. (Long Term Issuer Default Rating (IDR): BBB+/Positive), 11% by Apollo Management, L. P. (Long Term IDR: A/Stable) and 73% by other institutional investors and management. Fitch views the links to Athene, which includes a business cooperation agreement and knowledge-sharing, and Apollo, which provides asset-management services, as supportive for Athora's business profile and its ability to source assets to back acquired insurance liabilities.

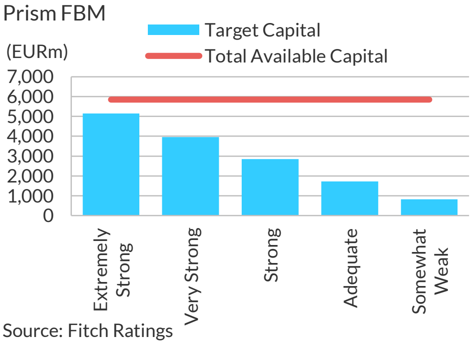
Capitalisation and Leverage

Very Strong Capitalisation and Leverage

Fitch views Athora's capitalisation and leverage as very strong and as having a moderate influence on the ratings.

Capitalisation Adequacy

Prism FBM



Source: Fitch Ratings

Financial Highlights

	2021	2020
Prism Score	Extremely Strong	Extremely Strong
Prism Total AC EURm	5,851	5,347
Prism AC/TC at Prism Score (%)	114	112
Prism AC/TC at Higher Prism Score (%)	n.a.	n.a.

AC – Available Capital, TC – Target Capital
Note: Reported on a consolidated basis.
Source: Fitch Ratings, Company.

Financial Highlights

(x)	31 Dec 21	31 Dec 20
Prism FBM score	Extremely Strong	Extremely Strong
Financial leverage ratio (%)	23.6	24.6
TFC/total equity	0.6	0.6
Operating leverage	9.7	11.8
Asset leverage	14.0	16.5
Regulatory group capital ratio (%)	187	200

Source: Fitch Ratings; Athora Holding Ltd..

Athora's Prism FBM score remained 'Extremely Strong' at end-2021. The group's FLR was stable at 24% at end-2021 as the capital and debt increases offset each other during the year. We regard Athora's total financing and commitments ratio of 0.6x as neutral to the ratings. Operating and asset leverage scored both in the 'aa' category at end-2021. Athora's Bermuda group solvency capital ratio was 187% at end-2021, down from 200% at end-2020.

Fitch Expectations

- We expect the FLR to slightly weaken to around 25% at end-2022, from 24% at end-2021.
- We expect capitalisation to decline as the company grows its business, but the Prism FBM score to remain at least 'Very Strong' in the medium term.

Debt Service Capabilities and Financial Flexibility

Strong Financial Flexibility and Coverage

Fitch views debt service capabilities and financial flexibility as strong and as having a low influence on the ratings.

Athora reported a stable fixed-charge coverage of around 7x in 2021 (2020: 8x). The group's fixed-charge coverage is supported by strong operating income and an improving fixed-cost basis, but remains negatively affected by integration costs from acquired businesses.

Athora's strong financial flexibility is evidenced by the group raising additional paid-in equity in in 2020 as part of the acquisitions of Athora NL. The group received further capital commitments from its shareholders including EUR770 million undrawn capital at end-2021, of which EUR570 million were undrawn shareholder funds and EUR200 million were undrawn preferred shares.

Athora has been relatively active in the debt markets since 2019. It has issued Tier 2 subordinated debt at capital markets and senior debt in various forms at banks. Further Restricted Tier 1 and senior debt was issued by Athora NL prior to its acquisition in 2020. In May 2022, Athora proposed to issue EUR500 million Tier 2 subordinated debt. We expect that the proceeds will primarily be used for re-financing the USD575 million bonds with having a call date in November 2022.

Fitch Expectations

- Fitch expects Athora to report fixed-charge coverage of at least 5x in the medium term.
- We expect financial flexibility to remain strong.

Financial Highlights

(x)	31 Dec 21	31 Dec 20
Fixed-charge coverage ratio	6.7	7.8

Source: Fitch Ratings; Athora Holding Ltd..

Debt Maturities

(As of May 2022)	(EURm)
2023	61
2024	150
2025	700
2031	300
2032*	500
Perpetual debt	1,467
Total**	**3,178**

Source: Fitch Ratings; Athora Holding Ltd.
*not yet issued, targeted volume EUR500 million
** including the planned EUR500 million T2 sub and the tendered USD575 million T2 sub in full

Financial Performance and Earnings

Strong Financial Performance and Earnings

Fitch regards Athora's profitability as strong and as having a high influence on the rating.

Athora reported a 'good' Fitch-calculated ROE of 3% for 2021, albeit significantly lower than the 28% in 2020. However, pre-tax operating income profitability was strong – the operating profit ROE was 12%. The net income ROE suffered from a high tax rate of almost 50%, based on pre-tax income.

The high ROE in 2020 was supported by the base effect of a significantly lower group equity position at end-2019 than at end-2020. Furthermore, it benefitted from one-off gains from the below-book value purchase of Athora NL and investment gains stemming from tactical changes to asset allocation.

Athora will continue to apply its strategic asset allocation at Athora NL, and we expect that profitability will improve notably following the implementation of this new strategy. Athora's asset recomposition led to a strong improvement in Athora NL's operating cashflow generation, which increased to EUR76 million in 2021 from a negative EUR106 million in 2020 because of shifting to higher-yielding investments. Athora NL's 2020 operating cashflow generation had been negative in 2020 due to decreasing yields, as, like most European life insurers, it had a large portion of guaranteed interest rate business in its books.

Financial Highlights

(%)	31 Dec 21	31 Dec 20
Net income return on equity	3.0	27.8
Pre-tax operating profit return on equity	12.3	25.1
Pre-tax operating ROA (including realised and unrealised gains) (%)	0.6	1.1

Source: Fitch Ratings; Athora Holding Ltd.

Fitch Expectations

- We expect the ROE to improve to 5%–8% in 2022 and to be at least 8% in 2023.
- We expect profitability to benefit from the implementation of Athora's strategic asset allocation at Athora NL favouring investments with higher expected returns.
- We expect additional cost savings coming through from increased economies of scale.

Investment and Asset Risk

High Investment Risk, Weaker than Rating Level

Fitch regards Athora's investment and asset risk as high, with a risky assets to capital ratio of 169% at end-2021. This level results in a 'good' asset risk score in our analysis, and has a moderate influence on the ratings.

The majority of Athora's investments are holdings of investment-grade corporate and government bonds. At end-2021, 43% of Athora's fixed-income investments were government bonds, 33% corporate bonds, 13% private loans and 14% mortgage loans. The group invests in private credit assets, alternative investments and commercial mortgage. We consider these latter investments to be risky because many of them are unrated. We include the unrated investments in our risky assets ratio according to our criteria guidelines.

Financial Highlights

(%)	31 Dec 21	31 Dec 20
Risky assets to capital	169.2	124.4
Equity investments to capital	51.6	50.7
Non-investment-grade bonds to capital	117.6	73.7

Source: Fitch Ratings; Athora Holding Ltd.

However, we believe that the intrinsic credit quality of Athora's unrated instruments is good on average, and only a minority share of unrated bonds falls into the speculative bonds pocket in terms of expected credit defaults. This assessment is supported by the sophisticated risk-selection processes being in place at Athora. As such, we have placed slightly less weight on the risky assets ratio for scoring the investment risk.

The lower risky asset ratio of 124% at end-2020 was driven by the fact that Athora NL was acquired during that year and only a low portion of investments were reallocated following Athora's strategic asset allocation. This includes an increasing share of corporate bonds within fixed-income investments (end-2021: 33%; end-2020: 29%), while government bonds' share decrease (end-2021: 43%; end-2020: 47%). Prior to the acquisition, Athora NL followed a more conservative investment strategy.

Athora's life insurers reported very strong Solvency II ratios ranging from 180% to 289% at end-2021; Solvency II ratios do take into account the credit worthiness of the fixed-income investments.

Fitch Expectations

- Fitch expects Athora's risky assets ratio to weaken to around 200% by end-2022, reflecting the continued implementation of the strategic asset allocation at Athora NL.
- Fitch expects Athora to maintain its sophisticated credit risk-selection processes.

Asset/Liability and Liquidity Management

Strong ALM and Liquidity Management

Fitch regards Athora's asset liability and liquidity management as strong and as having a moderate influence on the ratings.

This view is based on the group's sophisticated ALM frameworks, duration-matched assets and liabilities and an investment strategy that seeks to minimise capital volatility.

Athora Re's and Athora Ireland's liquidity and duration matching for reinsured blocks is set in line with the group's internal risk appetite, and is managed by repositioning assets into the target strategic asset allocation following receipt from the cedent.

Fitch Expectations

- Fitch expects Athora to maintain a liquid balance sheet and the group's assets and liabilities to continue to be well duration-matched.

Financial Highlights

(%)	31 Dec 21	31 Dec 20
Liquid assets/net technical reserves - excluding unit linked	70.0	78.6

Source: Fitch Ratings; Athora Holding Ltd.

Appendix A: Other Ratings Considerations

Below is a summary of additional ratings considerations that are part of Fitch's ratings criteria.

Group IFS Rating Approach

Athora Re's, Athora Ireland's and SRLEV's ratings are based on an analysis of Athora Holding's consolidated accounts. Fitch regards Athora Re, Athora Ireland and SRLEV as 'core' to Athora. They share the same IFS rating based on the combined assessment of the Athora group.

Athora focuses on acquiring or reinsuring traditional life insurance portfolios in various European markets. Athora Re and Athora Ireland provide intra-group reinsurance to these acquired portfolios and external reinsurance coverage. Athora Re and Athora Ireland have an integral role in Athora's capital-management strategy. SRLEV is a market leader in the corporate pension business in the Netherlands and represents approximately 80% of Athora's total assets.

Notching

For notching purposes, the regulatory environments of Bermuda, which is the leading regulator for the group, as well as in Ireland and the Netherlands, are assessed by Fitch as being 'Effective', and classified as following a Group Solvency approach.

Notching Summary

IFS Ratings
A baseline recovery assumption of 'Good' applies to the IFS rating, and standard notching was used from the IFS "anchor" rating to the implied operating company IDR.
Operating company debt
Not applicable
Holding company IDR
Standard notching was applied between the implied insurance operating company and holding company IDRs for a group solvency regulatory environment.
Holding company debt
A baseline recovery assumption of 'Below Average' was applied to Athora Netherland's senior notes. Standard notching relative to the IDR was used.
Hybrids
For Tier 2 subordinated debt issued by Athora Netherlands, a baseline recovery assumption of 'Poor' and a non-performance risk assessment of 'Moderate' were used. Three notches were applied relative to the IDR, which was based on two notches for recovery and one notch for non-performance risk. For restricted Tier 1 (RT1) subordinated debt issued by Athora Netherlands, a baseline recovery assumption of 'Poor' and a non-performance risk assessment of 'Moderate' were used. Four notches were applied relative to the IDR, which was based on two notches for recovery and two notches for non-performance risk. For the grandfathered RT1 subordinated debt issued by SRLEV, a baseline recovery assumption of 'Poor' and a non-performance risk assessment of 'Moderate' were used. Three notches were applied relative to the IDR, which was based on two notches for recovery and one notch for non-performance risk.

IFS – Insurer Financial Strength. IDR – Issuer Default Rating.

Rated Athora Holding Ltd. Insurance Entities

Athora Holding Ltd. IDR 'A-'
Athora Ireland plc IFS 'A'
Athora Life Re Ltd. IFS 'A'
Athora Netherlands N.V. IDR 'A-'
SRLEV N.V. IFS 'A' IDR 'A-'

IFS: Insurer Financial Strength
IDR: Long Term Issuer Default Rating
Source : Fitch Ratings

Hybrid – Equity/Debt Treatment

Hybrids Treatment

Hybrid	Amount	CAR Fitch (%)	CAR Reg. Override (%)	FLR Debt (%)
Athora Holding Ltd.				
Preference shares	(EUR519m)	100	n.a.	0
Athora Netherlands N.V.				
Restricted Tier 1 perpetual callable subordinated	(EUR300m)	100	n.a.	0
Tier 2 perpetual callable subordinated	(USD575m)	0	100	100
Tier 2 (2027/2032) sub (not yet issued)	(EUR500m)*	0	100	100
Tier 2 (2026/2031) subordinated	(EUR300m)	0	100	100
SRLEV N.V.				
Grandfathered restricted Tier 1 perpetual callable subordinated	(CHF105m)	100	n.a.	50

CAR – Capitalisation ratio: FLR – Financial leverage ratio. N.A. – Not applicable.
For CAR, % shows portion of hybrid value included as available capital, both before (Fitch %) and the regulatory override.
For FLR, % shows portion of hybrid value included as debt in numerator of leverage ratio.
*Proposed volume per 23 May 2022
Source: Fitch Ratings.

Transfer and Convertibility Risk (Country Ceiling)

None.

Criteria Variations

None.

Appendix B: Environmental, Social and Governance Considerations

FitchRatings **Athora Group**

Insurance Ratings Navigator
EMEA Life

Credit-Relevant ESG Derivation

Athora Group has 6 ESG potential rating drivers

- Athora Group has exposure to compliance risk; treating customers fairly; pricing transparency; privacy/data security; legal/regulatory fines; exposure to own cyber risk but this has very low impact on the rating.
- Athora Group has exposure to social responsibility and its effect on brand strength; increased vulnerability due to credit concentrations but this has very low impact on the rating.
- Governance is minimally relevant to the rating and is not currently a driver.

			Overall ESG Scale
key driver	0	issues	5
driver	0	issues	4
potential driver	6	issues	3
not a rating driver	2	issues	2
	6	issues	1

Environmental (E)

General Issues	E Score	Sector-Specific Issues	Reference	E Scale
GHG Emissions & Air Quality	1	n.a.	n.a.	5
Energy Management	1	n.a.	n.a.	4
Water & Wastewater Management	1	n.a.	n.a.	3
Waste & Hazardous Materials Management; Ecological Impacts	1	n.a.	n.a.	2
Exposure to Environmental Impacts	2	Impact of extreme weather events/natural catastrophes on operations or asset quality; credit concentrations	Financial Performance & Earnings; Investment & Asset Risk	1

Social (S)

General Issues	S Score	Sector-Specific Issues	Reference	S Scale
Human Rights, Community Relations, Access & Affordability	1	n.a.	n.a.	5
Customer Welfare - Fair Messaging, Privacy & Data Security	3	Compliance risk; treating customers fairly; pricing transparency; privacy/data security; legal/regulatory fines; exposure to own cyber risk	Industry Profile & Operating Environment; Company Profile	4
Labor Relations & Practices	2	Impact of labor negotiations, including board/employee compensation and composition	Company Profile	3
Employee Wellbeing	1	n.a.	n.a.	2
Exposure to Social Impacts	3	Social responsibility and its effect on brand strength; increased vulnerability due to credit concentrations	Company Profile; Investment & Asset Risk; Financial Performance & Earnings; Reinsurance, Risk Mitigation & Catastrophe Risk	1

Governance (G)

General Issues	G Score	Sector-Specific Issues	Reference	G Scale
Management Strategy	3	Operational implementation of strategy	Company Profile	5
Governance Structure	3	Board independence and effectiveness; ownership concentration; protection of creditor/stakeholder rights; legal /compliance risks; business continuity; key person risk; related party transactions	Company Profile	4
Group Structure	3	Organizational structure; appropriateness relative to business model; opacity; intra-group dynamics; ownership	Company Profile; Ownership	3
Financial Transparency	3	Quality and timing of financial reporting and auditing processes	Company Profile	2
				1

How to Read This Page
ESG scores range from 1 to 5 based on a 15-level color gradation. Red (5) is most relevant and green (1) is least relevant.

The Environmental (E), Social (S) and Governance (G) tables break out the individual components of the scale. The right-hand box shows the aggregate E, S, or G score. General Issues are relevant across all markets with Sector-Specific Issues unique to a particular industry group. Scores are assigned to each sector-specific issue. These scores signify the credit-relevance of the sector-specific issues to the issuing entity's overall credit rating. The Reference box highlights the factor(s) within which the corresponding ESG issues are captured in Fitch's credit analysis.

The Credit-Relevant ESG Derivation table shows the overall ESG score. This score signifies the credit relevance of combined E, S and G issues to the entity's credit rating. The three columns to the left of the overall ESG score summarize the issuing entity's sub-component ESG scores. The box on the far left identifies some of the main ESG issues that are drivers or potential drivers of the issuing entity's credit rating (corresponding with scores of 3, 4 or 5) and provides a brief explanation for the score.

Classification of ESG issues has been developed from Fitch's sector ratings criteria. The General Issues and Sector-Specific Issues draw on the classification standards published by the United Nations Principles for Responsible Investing (PRI) and the Sustainability Accounting Standards Board (SASB).

Sector references in the scale definitions below refer to Sector as displayed in the Sector Details box on page 1 of the navigator.

CREDIT-RELEVANT ESG SCALE

How relevant are E, S and G issues to the overall credit rating?

5	Highly relevant, a key rating driver that has a significant impact on the rating on an individual basis. Equivalent to "higher" relative importance within Navigator.
4	Relevant to rating, not a key rating driver but has an impact on the rating in combination with other factors. Equivalent to "moderate" relative importance within Navigator.
3	Minimally relevant to rating, either very low impact or actively managed in a way that results in no impact on the entity rating. Equivalent to "lower" relative importance within Navigator.
2	Irrelevant to the entity rating but relevant to the sector.
1	Irrelevant to the entity rating and irrelevant to the sector.

ESG Considerations

Unless otherwise disclosed in this section, the highest level of ESG credit relevance is a score of '3'. ESG issues are credit neutral or have only a minimal credit impact on the entity, either due to their nature or the way in which they are being managed by the entity. For more information on Fitch's ESG Relevance Scores, visit www.fitchratings.com/esg

The ratings above were solicited and assigned or maintained at the request of the rated entity/issuer or a related third party. Any exceptions follow below.