The German economy is expected to experience a challenging recovery over the projection horizon, primarily due to the lingering effects of high inflation, although it is gradually easing. The recovery process is further hampered by private investment being dampened by higher financing costs resulting from tighter monetary policies, especially in the housing construction sector. Additionally, exporters are facing headwinds due to a stronger euro and high wage dynamics. Nevertheless, real income and consumption expenditure of households are slowly recovering, thanks to rising wages and a robust labor market.

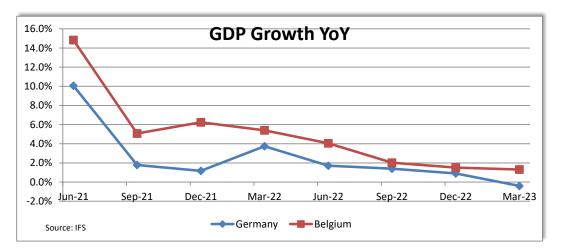
As per OECD estimates, the German economy is expected to stagnate in 2023 and experience a growth rate of 1.3% in 2024. However, there are some positive factors to consider. Export growth is set to recover in 2023 due to the easing of supply chain bottlenecks and a record-high order backlog. Investor and consumer confidence have improved, supported by strong energy prices and swift substitution of energy imports from Russia, coupled with declining energy costs. Affirming.

			Annual Ra	atios (sourc	e for past	results: IM	<u>F)</u>
CREDIT POSITION		<u>2020</u>	<u>2021</u>	2022	P2023	P2024	P2025
Debt/ GDP (%)		81.5	79.6	65.3	59.7	53.6	46.8
Govt. Sur/Def to GDP (%)		-4.0	-3.6	-2.6	-1.3	0.2	1.5
Adjusted Debt/GDP (%)		81.5	79.6	65.3	59.8	53.7	46.9
Interest Expense/ Taxes (%)		2.7	2.3	2.7	2.6	2.4	2.3
GDP Growth (%)		-2.0	5.8	7.4	2.5	3.6	3.6
Foreign Reserves/Debt (%)		1.1	1.1	1.4	1.6	1.8	2.0
Implied Sen. Rating		A+	AA	AA	AA	AA	AA
INDICATIVE CREDIT RATIOS		AA	A	BBB	BB	В	CCC
Debt/ GDP (%)		100.0	115.0	130.0	145.0	170.0	200.0
Govt. Sur/Def to GDP (%)		2.5	0.5	-2.0	-5.0	-8.0	-10.0
Adjusted Debt/GDP (%)		95.0	110.0	125.0	140.0	160.0	190.0
Interest Expense/ Taxes (%)		9.0	12.0	15.0	22.0	26.0	35.0
GDP Growth (%)		3.5	3.0	2.0	1.0	-1.0	-5.0
Foreign Reserves/Debt (%)		3.0	2.5	2.0	1.5	1.0	0.5
	Other	Debt	Govt. Surp.	. Adjusted	Interest	GDP	Ratio-
	NRSRO	as a %	Def to	Debt/	Expense/	Growth	Implied
PEER RATIOS	<u>Sen.</u>	<u>GDP</u>	<u>GDP (%)</u>	<u>GDP</u>	Taxes %	<u>(%)</u>	Rating*
Kingdom Of Belgium	AA	103.8	-3.4	103.8	5.1	9.3	AA-
French Republic	AA	117.1	-4.2	117.1	6.1	5.5	A-
Portugal Republic	BB+	116.6	-0.7	116.6	7.6	11.4	BB+
Republic Of Italy	BBB-	151.3	-7.8	151.3	14.6	6.8	BBB-
CDS Spreads (bps	;)						
150		Portuga		Country			
		0		Country		EJR Rtg. BBB-	<u>CDS</u> 45
100		Italy		Portugal Italy		BBB-	45 95
50		<del></del> Belgium	ו ו	Belgium		BBB	20
	X			France		A+	23
	1		Kingdom	United Kir	nadom	A+	23
Mar-23 Apr-23 May-23 Jun-23 Jul-23	Curr. CDS		3	Shited Ki	.940111	,	20
Egan-Jones Ratings Company *Note, non-NRSRO rating	Copyright E	Egan-Jones F	Ratings Co.;	no seconda	y distributi	on	

Rating Analysis - 8/18/23

# Economic Growth

According to available data, the economy showed signs of rebounding in Q2 after experiencing two consecutive quarter-on-quarter contractions. Retail sales saw growth in April and May on a monthly basis, supported by lower inflation. The services sector remained robust throughout Q2, as indicated by PMI data. However, the industrial sector weakened, with output growing less in April compared to Q1 and falling in May. The manufacturing PMI also remained in negative territory throughout June, indicating subdued conditions in the sector. The ifo Institute reported that enterprises' assessment of the business situation was more positive in the services sector, particularly compared to the preceding quarter. Looking ahead, the economy is projected to stagnate in 2023, with a modest growth rate of 1.3% expected in 2024. The subdued GDP growth in 2023 can be attributed to high inflation, which reduces real incomes and savings, thereby dampening private consumption.



# Fisical Policy

The temporary crisis-related support measures are expected to have a significant impact on the government deficit in 2023, amounting to just over 2% of GDP. However, these burdens will decrease notably throughout the year as the coronavirus measures expire. Among the support measures provided in response to the energy crisis, the most substantial strains in 2023 come from the broadly based electricity and gas price brakes. After considering revenue generated from electricity market sales, these strains are estimated to contribute to a deficit of just over 1% of GDP in 2023.

### **Unemployment**

In June 2023, Germany's unemployment rate ticked up to 5.7%, surpassing both the preliminary estimate and market expectations, which were set at 5.6%. The rate reached its highest level since June 2021, with 28K more people becoming unemployed, totaling 2.61 million, surpassing market expectations of a 13K increase. In comparison to the previous year, the number of unemployed individuals rose by

192K, while job openings decreased by 108K to 769K.



*Note non-NRSRO	rating Convright Egan-	Iones Ratings Co · n	o secondary distribution
	raung. Copynyni Lyan-	Juines mailligs 60., II	U SECONDANY DISTRIBUTION

	Surplus-to-	Debt-to-	5 Yr. CDS
	GDP (%)	GDP (%)	Spreads
Germany	-2.62	65.28	15.01
Belgium	-3.36	103.79	20.17
France	-4.25	117.11	22.50
United Kingd	-5.52	147.88	22.67
Portugal	-0.66	116.63	45.31
Italy	-7.83	151.26	95.04
Sources: Thom:	son Reuters and	IIFS	

	<u>2021</u>	<u>2022</u>
Germany	3.58	3.07
Belgium	6.28	5.58
France	7.88	7.32
United Kingd	4.00	3.70
Portugal	6.59	6.04
Italy	9.56	8.08

Rating Analysis - 8/18/23

Page 3

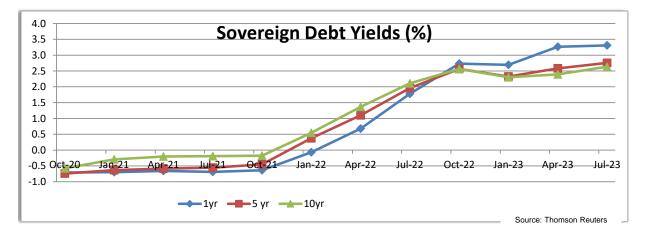
# **Banking Sector**

The German banking system remains strongly capitalized and enjoys healthy liquidity, meeting expected ratios. However, it is important to note that the system has become more vulnerable compared to a few years ago due to significant economic shocks. Despite these challenges, credit risk has remained low, thanks in part to comprehensive fiscal measures that have supported the economy.

Bank Assets (billions of local cu	irrency)	
Deutsche Bank Commerzbank	Assets 1,336.8 477.4	Mkt Cap/ Assets % 1.41 2.70
Total EJR's est. of cap shortfall at 10% of assets less market cap Germany's GDP	1,814.2	- 149.6 3,869.9

# Funding Costs

Currently, the Germany 10Y Government Bond is yielding 2.450%. The yield spread between 10 years and 2 years bonds is -82.1 basis points, indicating an inverted yield curve in which long-term maturities have lower yields than short-term maturities. This inversion could be an indication of potential economic uncertainty or market sentiment.



# Ease of Doing Business

Major factors for growing the economy are the ease of doing business and the economic freedom; although not the sole factor for determining economic growth, a country which makes it easy for businesses to operate and provides a reasonably free environment to conduct business has a good chance for growth. The chart on the right indicates that with an overall rank of 22 (1 is best, 189 worst) is strong.

The World Bank's Doing Business Survey*						
	2021	2020	Change in			
	<u>Rank</u>	<u>Rank</u>	<u>Rank</u>			
<b>Overall Country Rank:</b>	22	22	0			
Scores:						
Starting a Business	125	125	0			
Construction Permits	30	30	0			
Getting Electricity	5	5	0			
Registering Property	76	76	0			
Getting Credit	48	48	0			
Protecting Investors	61	61	0			
Paying Taxes	46	46	0			
Trading Across Borders	42	42	0			
Enforcing Contracts	13	13	0			
Resolving Insolvency	4	4	0			
* Based on a scale of 1 to 189 with 1	being the highes	st ranking.				

#### Egan-Jones Ratings Company

\*Note, non-NRSRO rating. Copyright Egan-Jones Ratings Co.; no secondary distribution

Page 4

# Economic Freedom

As can be seen below, Germany is above average in its overall rank of 73.7 for Economic Freedom with 100 being best.

	2023	2022	Change in	World
	Rank**	Rank	Rank	Avg.
Property Rights	94.8	95.7	-0.9	53.3
Government Integrity	89.4	89.4	0.0	44.4
Judical Effectiveness	93.1	95.3	-2.2	48.3
Tax Burden	60.2	59.9	0.3	78.1
Gov't Spending	28.3	34.5	-6.2	64.3
Fiscal Health	82.7	90.4	-7.7	54.5
Business Freedom	79.7	87.2	-7.5	59.8
Labor Freedom	52.8	52.3	0.5	55.5
Monetary Freedom	75.3	79.5	-4.2	72.1
Trade Freedom	78.6	79.2	-0.6	69.6
*Based on a scale of 1-100 with 100 being the highest r	ranking.			
**The ten economic freedoms are based on a scale of 0	0 (least free) to 100 (most free).			



Rating Analysis - 8/18/23

Page 5

### Credit Quality Driver: Taxes Growth:

FEDERAL REPUBLIC OF GERMANY has grown its taxes of 7.9% per annum in the last fiscal year which is more than the average for its peers. We expect tax revenues will grow approximately 7.9% per annum over the next couple of years and 7.1% per annum for the next couple of years thereafter.

### Credit Quality Driver: Total Revenue Growth:

FEDERAL REPUBLIC OF GERMANY's total revenue growth has been less than its peers and we assumed no growth in total revenue over the next two years.

Income Statement	Peer Median	Issuer	Assumptions Yr 1&2 Yr 3,4,5
Taxes Growth%	7.9	<b>Avg.</b> 7.9	7.9 7.1
Social Contributions Growth %	8.5	7.9 5.1	5.0 5.0
Grant Revenue Growth %	0.0	NMF	5.0 5.0
Other Revenue Growth %	0.0	NMF	
Other Operating Income Growth%	0.0	3.7	3.7 3.7
Total Revenue Growth%	7.9	5.7 6.4	6.4 5.7
	4.3	0.4 4.2	4.2 4.2
Compensation of Employees Growth% Use of Goods & Services Growth%	4.3 6.4	4.2 4.3	4.2 4.2
Social Benefits Growth%	6.4 5.0	4.3 3.5	4.5 4.5 3.5 3.5
Subsidies Growth%			3.0 3.0
	(6.3)	(34.8)	
Other Expenses Growth%	0.0	4.0	1.0
Interest Expense	1.8	1.0	1.0
Currency and Denesite (cease) Crowth <sup>0</sup>	(44 E)	0.0	
Currency and Deposits (asset) Growth%	(11.5)	0.0	
Securities other than Shares LT (asset) Growth%	(4.6)	0.0	E 4 E 4
Loans (asset) Growth%	17.9	5.4	5.4 5.4
Shares and Other Equity (asset) Growth%	57.9	(25.3)	2.0 2.0
Insurance Technical Reserves (asset) Growth%	(1.4)	18.9	18.9 17.0
Financial Derivatives (asset) Growth%	0.0	(28.7)	(10.0) (10.0)
Other Accounts Receivable LT Growth%	3.5	15.1	7.9 7.9
Monetary Gold and SDR's Growth %	0.0	0.0	5.0 5.0
Other Assets Growth%	0.0	0.0	
Other Accounts Payable Growth%	3.1	9.3	5.0 5.0
Currency & Deposits (liability) Growth%	(1.2)	9.3	0.5 0.5
	( )	( )	
Securities Other than Shares (liability) Growth%	(15.1)	(17.3)	(12.1) (12.1)
Loans (liability) Growth%	0.7	4.7	4.7 4.7
Insurance Technical Reserves (liability) Growth%	2.8	0.0	
Financial Derivatives (liability) Growth%	(60.0)	0.0	
Additional ST debt (1st year)(billions EUR)	0.0	0.0	



Rating Analysis - 8/18/23

### Page 6

### ANNUAL INCOME STATEMENTS

Below are FEDERAL REPUBLIC OF GERMANY's annual income statements with the projected years based on the assumptions listed on page 5.

ANNUAL REVENUE AND EXPENSE STATEMENT						
	(BILLIONS E	UR)				
	2019	2020	2021	2022	P2023	P2024
Taxes	834	783	888	957	1,033	1,115
Social Contributions	598	608	634	666	699	734
Grant Revenue						
Other Revenue						
Other Operating Income	183	178	191	197	197	197
Total Revenue	1,616	1,569	1,712	1,821	1,930	2,046
Compensation of Employees	273	284	294	307	320	333
Use of Goods & Services	187	209	227	237	247	258
Social Benefits	846	905	941	974	1,009	1,044
Subsidies	28	73	112	73	73	73
Other Expenses				205	205	205
Grant Expense						
Depreciation	79	82	88	100	100	100
Total Expenses excluding interest	1,532	1,685	1,821	1,896	1,953	2,013
Operating Surplus/Shortfall	84	-116	-109	-75	-24	33
Interest Expense	<u>27</u>	<u>22</u>	<u>21</u>	<u>26</u>	<u>26</u>	<u>27</u>
Net Operating Balance	57	-137	-130	-101	-50	7



\*EJR Sen Rating(Curr/Prj) AA/ AA

Rating Analysis - 8/18/23

#### Page 7

### ANNUAL BALANCE SHEETS

Below are FEDERAL REPUBLIC OF GERMANY's balance sheets with the projected years based on the assumptions listed on page 5.

Base Case			NUAL BALA		ſS	
ASSETS	2019	2020	2021	2022	P2023	P2024
Currency and Deposits (asset)	375	457	471	417	417	417
Securities other than Shares LT (asset)	140	140	135	123	123	123
Loans (asset)	-1	35	9	9	10	10
Shares and Other Equity (asset)	11	12	11	8	8	.0
Insurance Technical Reserves (asset)	1	1	1	1	1	2
Financial Derivatives (asset)	-52	-65	-52	-37	-33	-30
Other Accounts Receivable LT Monetary Gold and SDR's	111	115	127	146	158	170
Other Assets					834	834
Additional Assets	<u>820</u>	<u>873</u>	<u>955</u>	<u>834</u>		
Total Financial Assets	1,404	1,569	1,656	1,502	1,518	1,535
LIABILITIES Other Accounts Payable	112	114	124	135	142	149
Currency & Deposits (liability)	14	14	18	17	17	17
Securities Other than Shares (liability)	1,717	2,089	2,170	1,794	1,576	1,385
Loans (liability) Insurance Technical Reserves (liability) Financial Derivatives (liability) Other Liabilities	542	558	555	581	631	624
Liabilities	2,385	2,776	2,866	2,526	2,593	2,603
Net Financial Worth Total Liabilities & Equity	<u>-981</u> 1,404	<u>-1,207</u> 1,569	<u>-1,211</u> 1,656	<u>-1,025</u> 1,502	<u>-1,075</u> 1,518	<u>-1,068</u> 1,535



#### Page 8

Copyright © 2023, Egan-Jones Ratings Company, Inc. ("Egan-Jones"). All rights reserved. The information upon which Egan-Jones ratings and reports are based is obtained by Egan-Jones from sources Egan-Jones believes to be accurate and reliable. Egan-Jones relies on third party reports and information and data provided and Egan-Jones has not, unless required by law or internal policies/procedures, independently verified or performed due diligence related to the accuracy of information, data or reports. Egan-Jones has not consented to, nor will consent to, being named an "expert" under federal securities laws, including without limitation, Section 7 of the Securities Act of 1933. Please note that expected or final ratings are not recommendations to buy, hold or sell the securities. Egan-Jones is not an advisor and is not providing investment advice, strategy or related services. Egan-Jones and its third-party suppliers ("Suppliers") hereby disclaim any representation or warranty, express or implied, as to the accuracy, timeliness, completeness, merchantability, and fitness for any particular purpose or non-infringement of any of such information. In no event shall Egan-Jones or its directors, officers, employees, independent contractors, agents, representatives, or Suppliers (collectively, Egan-Jones Representatives) be liable (1) for any inaccuracy, delay, loss of data, interruption in service, error. (negligent or otherwise) or other circumstance or contingency within or outside the control of Egan-Jones or any Egan-Jones Representative, in connection with or related to obtaining, collecting, compiling, analyzing, interpreting, communicating, publishing or delivering any such information. Ratings and other opinions issued by Egan-Jones are, and must be construed solely as, statements of opinion and not statements of fact as to credit worthiness or recommendations to purchase, sell or hold any securities. A report providing an Egan-Jones rating is neither a prospectus nor a substitute for the information assembled, verified and presented to investors by the issuer and its agents in connection with the sale of the securities. Egan-Jones is not responsible for the content or operation of third party websites accessed through hypertext or other computer links and Egan-Jones shall have no liability to any person or entity for the use of such third party websites. This publication may not be reproduced, retransmitted or distributed in any form without the prior written consent of Egan-Jones. Egan-Jones ratings are subject to disclaimers. Egan-Jones is not an NRSRO (as defined by the SEC) for sovereign/municipal issuers and structured finance/ABS issuers.

### Comments on the Difference between the Model and Assigned Rating

We consider a one or less "notch" difference between in the recent results and therefore we have used our best judgement in making adjustments which are reflected in the results for the projected ratings. We have assigned a rating of "AA" whereas the ratio-implied rating for the most recent period is "AA"; we expect results to remain approximately the same.

#### Changes in Indicative Ratios

We have not made any adjustment in the indicative ratios at this time.



Page 9

# SEC Rule 17g-7(a) Disclosure

Below are the disclosures as required by Paragraph (a) of Rule 17g-7.

# 1. The symbol in the rating scale used to denote the credit rating categories and notches within categories and the

*identity of the obligor, security, or money market instrument as required by Paragraph (a)(1)(ii)(A) of Rule 17g-7:* For the issuer FEDERAL REPUBLIC OF GERMANY with the ticker of 3413Z GR we have assigned the senior unsecured rating of AA. There are three notches in our rating categories (e.g., A-, A, and A+) other than those deep into speculative grade; for CC, C, and D there are no notches.

# 2. The version of the procedure or methodology used to determine the credit rating as required by Paragraph (a)(1)(ii)(B) of Rule 17g-7:

We are using the methodology version #16 available via egan-jones.com under the tab at the bottom of the page "Methodologies".

# 3. The main assumptions and principles used in constructing the procedures and methodologies used to determine the credit rating as required by Paragraph (a)(1)(ii)(C) of Rule 17g-7:

The credit rating assigned reflects our judgement regarding the future credit quality of the issuer. Regarding the specific assumptions used, please refer to page 3 of this Rating Analysis Report.

#### 4. The potential limitations of the credit rating as required by Paragraph (a)(1)(ii)(D) of Rule 17g-7:

Our rating pertains solely to our view of current and prospective credit quality. Our rating does not address pricing, liquidity, or other risks associated with holding investments in the issuer.

#### 5. Information on the uncertainty of the credit rating as required by Paragraph (a)(1)(ii)(E) of Rule 17g-7:

Our rating is dependant on numerous factors including the reliability, accuracy, and quality of the data relied used in determining the credit rating. The data is sourced from publicly-available 10Q and 10K statements, quarterly reports, 8K filings, earnings reports, and other similar sources. In some cases, the information is limited because of issues such as short operating histories, the lack of reported data, a delay in reporting data, restatements, inaccurate accounting, and other issues. Such shortcomings are not always readily apparent. EJR aims to identify such shortcomings and make adjustments using its best judgement.

# 6. Whether and to what extent third-party due diligence services have been used in taking the rating action as required by Paragraph (a)(1)(ii)(F) of Rule 17g-7:

EJR does not utilize third-party due diligence services.

# 7. How servicer or remittance reports were used, and with what frequency, to conduct surveillance of the credit rating as required by Paragraph (a)(1)(ii)(G) of Rule 17g-7:

Servicer or remittance reports normally pertain to structured finance issuers; this report does not pertain to a structured finance issuer (EJR is not an NRSRO for structured finance or sovereigns/ municipal issuers). Regarding surveillance, the minimum time period for corporation issuers is normally one year.

# 8. A description of the data that were relied upon for the purpose of determining the credit rating as required by Paragraph (a)(1)(ii)(H) of Rule 17g-7:

EJR uses 10Q and 10K statements, quarterly reports, 8K filings, earnings reports, governmental filings and other similar sources for ratings on publicly-traded issuers. In the case of private issuers, EJR relies on information provided mainly by issuers.

# 9. A statement containing an overall assessment of the quality of information available and considered in the credit rating as required by Paragraph (a)(1)(ii)(I) of Rule 17g-7: The information is generally high quality and readily avail.

# 10. Information relating to conflicts of interest as required by Paragraph (a)(1)(ii)(J) of Rule 17g-7: This rating is unsolicited.



Rating Analysis - 8/18/23

#### Page 10

#### 11. An explanation or measure of the potential volatility of the credit rating as required by Paragraph (a)(1)(ii)(K) of Rule 17g-7:

Our rating aims to assess the probability of the payment of obligations in full and on-time. Factors which affect such probability, and in turn our rating, include changes in the operating performance of the issuer, changes in capital structure, and merger and acquisition events.

#### 12. Information on the content of the credit rating as required by Paragraph (a)(1)(ii)(L) of Rule 17g-7:

Regarding the historical performance of the credit rating, our rating transition matrix is available in our Form NRSRO, exhibit 1. The expected probability of default and the expected loss in the event of default is listed on the first page of this report.

# **13.** Information on the sensitivity of the credit rating to assumptions as required by Paragraph (a)(1)(ii)(M) of Rule 17g-7: Below is a summary of the impact of the 5 assumptions which independently would have the greatest impact on our "ratio-implied rating":

	Assumptions			Resulting Ratio-Implied Rating			
	Base	Optimistic	Pessimistic	Base	Optimistic	Pessimistic	
Taxes Growth%	7.9	11.9	3.9	AA	AA	AA	
Social Contributions Growth %	5.0	8.0	2.0	AA	AA	AA	
Other Revenue Growth %		3.0	(3.0)	AA	AA	AA	
Total Revenue Growth%	6.4	8.4	4.4	AA	AA	AA	
Monetary Gold and SDR's Growth %	5.0	7.0	3.0	AA	AA	AA	

14. If the credit rating is assigned to an asset-backed security, a description of: (i) the representations, warranties, and enforcement mechanisms available to investors; and (ii) how they differ from the representations, warranties, and enforcement mechanisms in issuances of similar securities, as required by Paragraph (a)(1)(ii)(N) of Rule 17g-7: This credit rating is not assigned to an asset-backed security.

### ATTESTATION FORM

In compliance with the US Securities and Exchange Commission (SEC) Rule 17g-7(a), the Egan-Jones analyst who published the report is responsible for the rating action and to the best knowledge of the person:

- 1) No part of the credit rating was influenced by any other business activities,
- 2) The credit rating was based solely upon the merits of the obligor, security, or money market instrument being rated, and
- 3) The credit rating was an independent evaluation of the credit risk of the obligor, security, or money market instrument.

#### Analyst Signature:

Subramanian NG Senior Rating Analyst

**Reviewer Signature:** 

Steve Chang

Steve Zhang Senior Rating Analyst

Today's Date

August 18, 2023

.....

Today's Date

August 18, 2023



# Sovereign Rating Methodology (Non-NRSRO)

### Scope and Limitations: Sovereign Issuer Credit Quality Ratings (CQR) are a forward-

looking assessment of a sovereign's capacity and willingness to honor its existing and future obligations in full and on time. Sovereigns are assigned two CQRs: a Local-Currency CQR, which reflects the likelihood of default on debt issued and payable in the currency of the sovereign, and a Foreign-Currency CQR, which is an assessment of the credit risk associated with debt issued and payable in foreign currencies.

# Key Rating Drivers: EJR's approach to sovereign risk analysis is a synthesis of quantitative and qualitative judgments. The quantitative factors EJR uses are:

- Debt in relation to GDP.
- Surplus or deficit in relation to GDP.
- Debt plus potential under-funding of major banks in relation to GDP.
- Interest expense in relation to taxes.
- GDP growth.
- Foreign reserves in relation to debt.

Debt levels for many sovereign issuers have increased at an accelerating rate over the past decade, affecting implied ratings. EJR also considers unemployment levels and funding costs. EJR recognizes that no model can fully capture all the relevant influences on sovereign creditworthiness, meaning that the its sovereign ratings can and do differ from those implied by the rating model. Some of the qualitative factors that impact its ultimate assessment of credit quality include the flexibility, stability and overall strength of the economy, efficiency of tax collection, acceptance of contract law, ease of doing business, trade balances, prospects for future growth and health and monetary policy, and economic freedom. These subjective and dynamic qualitative issues are not captured by the model but affect sovereign ratings

For additional information, please see Exhibit 2: Methodologies in EJR's Form NRSRO.

