

CREDIT OPINION

20 December 2022

Update



Contacts

Rita Sahu, CFA +1.212.553.1648 VP-Sr Credit Officer rita.sahu@moodys.com

Siri Ginjupalli +1.212.553.3805 Associate Analyst siri.ginjupalli@moodys.com

Allen Tischler +1.212.553.4541
Senior Vice President
allen.tischler@moodys.com

Jill Cetina, CFA +1.212.335.7000

Associate Managing Director
jill.cetina@moodys.com

Federal Home Loan Bank of Topeka

Update to credit analysis

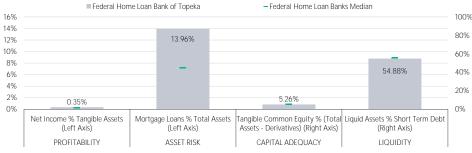
Summary

The Federal Home Loan Bank of Topeka's (FHLBank Topeka). Aaa long-term and Prime-1 short-term deposit ratings are in-line with the deposit ratings of the other ten regional FHLBanks. These ratings reflect the combination of FHLBank Topeka's a1 Baseline Credit Assessment (BCA) and our view that there is a very high likelihood of support from the US Government (Aaa stable) in the event that an individual FHLBank or the FHLBank System were in danger of default due to the FHLBanks' special role as providers of liquidity to the US banking system. The rating outlook is stable.

FHLBank Topeka's a1 BCA is based on the excellent asset quality of its advance portfolio, investment portfolio, and mortgage portfolio, along with its consistent earnings generation. FHLBank Topeka benefits from its core business of advancing funds to members, with \$35.3 billion outstanding as of 30 September 2022. While the credit performance of the FHLBank Topeka's mortgage assets, which equal 12.6% of assets as of 30 September 2022, has been excellent, mortgage assets carry heightened operational complexity along with greater interest rate risk and credit risk relative to the FHLBank's core lending business.

The stable outlook is in line with the outlook on the ratings of the US Government. Any rating actions on the US Government would likely result in all individual FHLBanks' long-term deposit ratings, and the FHLBank System's Aaa long-term bond rating, moving in lock step with the US sovereign rating. FHLBank Topeka, and the ten other regional FHLBanks, have joint and several liability for the FHLBank System's consolidated issuance of bonds and discount notes.

Exhibit 1
Rating Scorecard - Key Financial Ratios [1]



[1] All ratios are as of 06/30/2022. Source: Moody's Investors Service

Credit strengths

- » Excellent credit quality of its advance, investment, and mortgage portfolios minimize asset risk
- » Although narrowly focused, the FHLBanks, including FHLB Topeka, are central liquidity providers to US banks, underscoring their systemic importance

Credit challenges

- » Narrow FHLB charter and bank consolidation limit growth
- » Substantial single borrower concentrations
- » Reliance on confidence-sensitive market funding, but market access is strong because of consolidated issuance and FHLB status as a government-sponsored enterprise (GSE)

Outlook

Our stable outlook for FHLBank Topeka's long-term deposit ratings reflects the stable outlook on the US government's Aaa debt rating.

Factors that could lead to an upgrade

At Aaa, an upgrade of FHLBank Topeka's long-term deposit rating is not possible. A higher BCA could occur if FHLBank Topeka increased its advances to approximately 70% of assets while it also displayed: 1) strong profitability, 2) a stable member risk profile, 3) continued strong asset risk, including modest asset-liability and operational risk, and 4) robust capital and liquidity.

Factors that could lead to a downgrade

Any negative rating action on the US Government would likely result in all individual FHLBanks' long-term deposit ratings moving in lock step with any US sovereign rating action.

Factors that could lead to a downgrade of FHLBank Topeka's BCA of a1 include elevated loss expectations on its investment or mortgage portfolio, multiple quarterly net losses or significant asset-liability mismatches. In addition, an expansion of its risk profile, for example due to a change in the FHLBanks' government mandate or self-initiated, could result in a lower standalone BCA. A lower BCA could result in a lower long-term deposit rating.

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

Key Indicators

Exhibit 2
Federal Home Loan Bank of Topeka (Consolidated Financials) [1]

| | 06-22 ² | 12-21 ² | 12-20 ² | 12-19 ² | 12-18 ² | CAGR/Avg. ³ |
|---|--------------------|--------------------|--------------------|--------------------|--------------------|------------------------|
| Total Assets (USD Billion) | 57.5 | 48.0 | 52.6 | 63.3 | 47.7 | 5.5 ⁴ |
| Net Income / Tangible Assets (%) | 0.4 | 0.3 | 0.2 | 0.3 | 0.4 | 0.3 ⁵ |
| Liquid Assets (GSE) / Short Term Debt (%) | 54.9 | 55.1 | 49.2 | 42.4 | 19.8 | 44.3 ⁵ |
| Tangible Common Equity / (Total Assets - Derivatives) (%) | 5.3 | 5.5 | 5.0 | 4.4 | 5.1 | 5.1 ⁵ |
| Mortgage Loans / Total Assets (%) | 14.0 | 17.0 | 17.5 | 16.8 | 17.6 | 16.6 ⁵ |

[1] All figures and ratios are adjusted using Moody's standard adjustments. [2] Basel I; US GAAP. [3] May include rounding differences because of the scale of reported amounts. [4] Compound annual growth rate (%) based on the periods for the latest accounting regime. [5] Simple average of periods for the latest accounting regime. Sources: Moody's Investors Service and company filings

Profile

The FHLBanks are federally-chartered GSEs that were organized under the Federal Home Loan Bank Act of 1932. The FHLBanks together with the Office of Finance comprise the FHLBank System. Each of the FHLBanks and the Office of Finance operate under the supervisory and regulatory framework of the Federal Housing Finance Agency (FHFA). Each FHLBank operates as a separate entity with its own management, employees, and board of directors. The FHLBank of Topeka reported total consolidated assets of \$63.5 billion as of 30 September 2022.

The FHLBanks' primary business is lending to member institutions, primarily banks, savings institutions and credit unions, in the form of advances, which are generally short-term and over-collateralized, minimizing the credit risk on these loans. In addition, the FHLBanks benefit from their statutory lien priority with respect to pledged member assets. The FHLBanks also purchase mortgage loans, principally 15-30 year conventional and government-guaranteed or insured fixed-rate loans. The FHLBanks also invest in securities, principally MBS, subject to an investment limit of three times regulatory capital without approval by the FHFA. Some FHLBanks offer correspondent services to their member institutions, including wire transfer, security safekeeping, and settlement services.

Detailed credit considerations

Asset quality and credit risk management

The asset quality of FHLBank Topeka is exceptional. Advances, which represented about 55.6% of total assets as of 30 September 2022, are over-collateralized and an FHLBank has never incurred a loss on an advance in its 90 year history. This is reflected in the aa2 assigned score for Asset Risk in our scorecard.

Similar to other FHLBanks, FHLBank Topeka's balance sheet composition is narrowly focused. Beyond its advance portfolio, investments, which are primarily high quality US government and agency guaranteed securities, comprise 31.1% of assets. FHLBank Topeka's mortgage portfolio, representing 12.6% of total assets as of 30 September 2022, has experienced far lower losses and delinquencies than industry averages. Nonetheless, asset-liability management of the mortgage portfolio can present challenges.

■ Investments ■ Mortgage Loans Cash & Other Assets 100% 90% 80% 70% 60% 50% 40% 30% 20% 10% 0% New York Atlanta Chicago Dallas Pittsburgh Des Moines San Francisco Boston Topeka Cincinnati Indianapolis

Exhibit 3
FHLBank Topeka's asset mix compared to those of the other FHLBanks

As of 09/30/2022. Source: Company Filings

Similar to other FHLBanks, FHLBank Topeka has significant borrower concentrations, a long-term earnings risk. Its top five advance borrowers represented 26.8% of total assets as of 30 September 2022, an amount comparable to the average for all FHLBanks, which was approximately 26.0% as of 30 June 2022. This has not changed much from a year ago.

Interest rate risk management

FHLBank Topeka conservatively manages its interest rate risk exposures through the use of debt with similar characteristics to its assets, as well as derivatives. The FHLBank's primary asset is advances, which come in a variety of types, including fixed rate, variable rate, and callable by the member. Prepayment fees, which mitigate interest rate risk, are also a common feature of advances.

Capital adequacy

FHLBank Topeka is required by legislation to maintain minimum regulatory capital of 4.00% of its total assets. As of 30 September 2022, the capital ratio of the FHLBank was 5.27%, compared to 5.65% as of 31 December 2021. The aa2 assigned score for Capital in our scorecard incorporates our estimate of FHLBank Topeka's TCE ratio on a risk-weighted basis, which is very strong.

Profitability

FHLBank Topeka's low but consistent profitability as measured by return on average assets (ROAA) reflects the primarily low to moderate risk profile of its asset base. In the first nine months of 2022, the FHLBank Topeka's reported ROAA was 0.42%, higher than 0.31% reported in the same period in the prior year. The baa1 assigned score for Profitability in our scorecard reflects the extremely low earnings volatility owing to the company's low asset risk profile.

Liquidity and funding

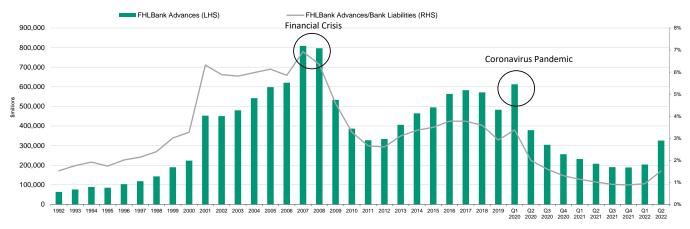
The FHLBanks' GSE status provides them with consistent and stable debt market access. Consequently, the FHLBanks generally maintain lower liquidity than non-GSE entities. As of 30 June 2022, FHLBank Topeka had liquid assets as a percentage of short term debt of 54.9%, as compared to 54.7% for the FHLBank system. This is not materially different from a year ago.

The FHFA issued updated liquidity guidance in the summer of 2018 that took full effect on 31 December 2019. Under the updated guidance, the FHFA established requirements for the FHLBanks' base case liquidity and implemented new funding gap metrics for three-month and one-year maturity horizons. In addition, the guidance addressed liquidity stress testing and contingency funding plans. The FHLBank Topeka continues to be in compliance with all its liquidity requirements.

Special role as a provider of liquidity to US financial institutions

As GSEs, the FHLBanks' ability to access funding throughout the cycle underpins their importance to the financial system. This is particularly true during times of extreme market disruption when they become a primary source of contingent liquidity for their members. As Exhibit 4 shows, at the height of the last financial crisis, advances to members climbed a few hundred billion dollars for the system as a whole before receding as the financial markets and overall economy recovered. Advances have also climbed in Q2 2022 as banks seek alternative funding as their deposit balances decline.

Exhibit 4
FHLB Advances have proven to be a stable source of funding, even during a crisis



Source: FDIC

GSE reform

In the fall of 2022, the FHLBank System's regulator, the Federal Housing Finance Agency (FHFA), began a comprehensive review of the System that could result in changes to its mission, organizational structure, membership criteria and/or other areas. The review will continue into 2023 and any recommendations or changes that result may not be known for several months.

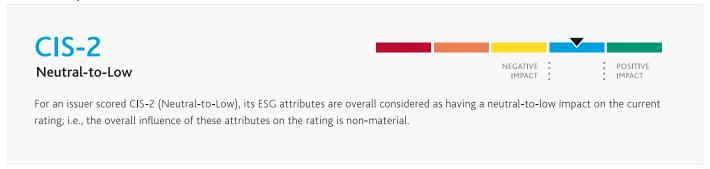
Although the FHFA's review is broad and it remains unclear what will be proposed, for creditors, expansion of FHLBank membership will be a particular area of interest. In a scenario where firms with large non-depository and non-insurance operations, such as non-bank mortgage companies, are given access to FHLBank advances, that could increase the FHLBanks' asset risk. Other areas of the review center on the banks' mission, organization, efficiency, role in promoting a resilient housing market, ability and effectiveness in addressing the needs of rural and vulnerable communities, and the FHLBanks' products, services and collateral requirements.

ESG considerations

Federal Home Loan Bank of Topeka's ESG Credit Impact Score is Neutral-to-Low CIS-2

Evhibit 5

ESG Credit Impact Score



Source: Moody's Investors Service

FHLB Topeka's ESG Credit Impact Score is neutral-to-low (CIS-2), reflecting the limited credit impact of environmental and social factors on the rating to date. The bank faces neutral-to-low governance risks

Exhibit 6
ESG Issuer Profile Scores



Source: Moody's Investors Service

Environmental

FHLB Topeka faces low environmental risks. Its loan portfolio consists of wholesale advances to banks, insurance companies and credit unions. Although most of its bank customers face moderate carbon transition risks through their own loan portfolios, and many of its insurance companies face moderate physical climate risks through their client exposures, FHLB Topeka is only indirectly exposed to these risks and its advance portfolio is diversified.

Social

FHLB Topeka faces low social risks. Its clients are member institutions, such as banks, insurance companies and credit unions, and minimal interaction with retail clients mitigates the risks related to customer relations and demographic and societal trends. While FHLBank Topeka also faces high cyber risk similar to its banking peers, it faces lower risks of customer relations fallout than a typical bank because of its institutional client base.

Governance

FHLB Topeka faces low governance risks. The bank has never reported credit losses on advances, it primary product, highlighting its strong financial strategy and risk management. The bank's strategy and asset composition are based on its Congressional mission and reinforced by its regulators. Like its FHLBank peers, FHLB Topeka is a separately chartered cooperative owned by its respective members, with its own board of directors, management and employees. The bank's mandate, regulatory oversight and policies limit the ability of board members to act against the interest of bondholders, which mitigates the potential conflict of interest resulting from board members being executives of its borrowers.

ESG Issuer Profile Scores and Credit Impact Scores for the rated entity/transaction are available on Moodys.com. In order to view the latest scores, please click here to go to the landing page for the entity/transaction on MDC and view the ESG Scores section.

Methodology and scorecard

Our Scorecard is designed to capture, express and explain in summary form our Rating Committee's judgment. When read in conjunction with our research, a fulsome presentation of our judgment is expressed. As a result, the output of our Scorecard may materially differ from that suggested by raw data alone (though it has been calibrated to avoid the frequent need for strong divergence). The Scorecard output and the individual scores are discussed in rating committees and may be adjusted up or down to reflect conditions specific to each rated entity.

Exhibit 7
Federal Home Loan Bank of Topeka

| Macro Factors | | | | | | |
|---|-------------------|------------------|-------------------|----------------|------------------------------|---------------|
| Weighted Macro Profile Very Strong | 100% | | | | | |
| Factor | Historic Ratio | Initial Score | Expected Trend | Assigned Score | Key driver #1 | Key driver #2 |
| Solvency | | | | | | |
| Asset Risk | | | | | | |
| Problem Loans / Gross Loans | 0.2% | aa1 | \leftrightarrow | aa2 | Long-run loss performance | |
| Capital | | | | | | |
| Tangible Common Equity / Risk Weighted Assets (Basel I) | | | | aa2 | Risk-weighted capitalisation | |
| Profitability | | | | | | |
| Net Income / Tangible Assets | 0.3% | ba2 | \leftrightarrow | baa1 | Earnings quality | |
| Combined Solvency Score | | | | aa3 | | |
| Liquidity | | | | | | |
| Funding Structure | | | | | | |
| Market Funds / Tangible Banking Assets | 92.1% | caa3 | \leftrightarrow | baa1 | Market funding quality | |
| Liquid Resources | | | | | | |
| Liquid Banking Assets / Tangible Banking Assets | 32.6% | a1 | \leftrightarrow | baa2 | Expected trend | |
| Combined Liquidity Score | | ba3 | | baa1 | | |
| Financial Profile | | | | a1 | | |
| Qualitative Adjustments | | | | Adjustment | | |
| Business Diversification | | | | 0 | | |
| Opacity and Complexity | | | | 0 | | |
| Corporate Behavior | | | | 0 | | |
| Total Qualitative Adjustments | | | | 0 | | |
| Sovereign or Affiliate constraint | | | | Aaa | | |
| BCA Scorecard-indicated Outcome - Range | | | | aa3 - a2 | | |
| Assigned BCA | | | | a1 | | |
| Affiliate Support notching | | | | - | | - |
| Adjusted BCA | | | | a1 | | |

^[1] Where dashes are shown for a particular factor (or sub-factor), the score is based on non-public information. Source: Moody's Investors Service

Ratings

Exhibit 8

| Category | Moody's Rating | | |
|----------------------------------|----------------|--|--|
| FEDERAL HOME LOAN BANK OF TOPEKA | | | |
| Outlook | Stable | | |
| Bank Deposits | Aaa/P-1 | | |
| PARENT: FEDERAL HOME LOAN BANKS | | | |
| Outlook | Stable | | |
| Senior Unsecured | Aaa | | |
| ST Issuer Rating | P-1 | | |
| | | | |

Source: Moody's Investors Service

© 2022 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved. CREDIT RATINGS ISSUED BY MOODY'S CREDIT RATINGS AFFILIATES ARE THEIR CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND MATERIALS, PRODUCTS, SERVICES AND INFORMATION PUBLISHED BY MOODY'S (COLLECTIVELY, "PUBLICATIONS") MAY INCLUDE SUCH CURRENT OPINIONS. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT OR IMPAIRMENT. SEE APPLICABLE MOODY'S RATING SYMBOLS AND DEFINITIONS PUBLICATION FOR INFORMATION ON THE TYPES OF CONTRACTUAL FINANCIAL OBLIGATIONS ADDRESSED BY MOODY'S CREDIT RATINGS. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS, NON-CREDIT ASSESSMENTS ("ASSESSMENTS"), AND OTHER OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S PUBLICATIONS MAY ALSO INCLUDE QUANTITATIVE MODEL-BASED ESTIMATES OF CREDIT RISK AND RELATED OPINIONS OR COMMENTARY PUBLISHED BY MOODY'S ANALYTICS, INC. AND/OR ITS AFFILIATES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS DO NOT COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS, ASSESSMENTS AND OTHER OPINIONS AND PUBLISHES ITS PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE. HOLDING, OR SALE.

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

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT.

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

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

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

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

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

Moody's Investors Service, Inc., a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by Moody's Investors Service, Inc. have, prior to assignment of any credit rating, agreed to pay to Moody's Investors Service, Inc. for credit ratings opinions and services rendered by it fees ranging from \$1,000 to approximately \$5,000,000. MCO and Moody's Investors Service also maintain policies and procedures to address the independence of Moody's Investors Service credit ratings and credit rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold credit ratings from Moody's Investors Service and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at www.moodys.com under the heading "Investor Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

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

Additional terms for Japan only: Moody's Japan K.K. ("MJKK") is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly-owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MJKK. MSFJ is not a Nationally Recognized Statistical Rating Organization ("NRSRO"). Therefore, credit ratings assigned by MSFJ are Non-NRSRO Credit Ratings. Non-NRSRO Credit Ratings are assigned by an entity that is not a NRSRO and, consequently, the rated obligation will not qualify for certain types of treatment under U.S. laws. MJKK and MSFJ are credit rating agencies registered with the Japan Financial Services Agency and their registration numbers are FSA Commissioner (Ratings) No. 2 and 3 respectively.

MJKK or MSFJ (as applicable) hereby disclose that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MJKK or MSFJ (as applicable) have, prior to assignment of any credit rating, agreed to pay to MJKK or MSFJ (as applicable) for credit ratings opinions and services rendered by it fees ranging from JPY100,000 to approximately JPY550,000,000.

 $MJKK\ and\ MSFJ\ also\ maintain\ policies\ and\ procedures\ to\ address\ Japanese\ regulatory\ requirements.$

REPORT NUMBER 1348270

