

Banco de los Trabajadores

Key Rating Drivers

Challenging Operating Environment: Banco de los Trabajadores's (Bantrab, or the bank) Issuer Default Ratings (IDRs) and national ratings are driven by its VR. Bantrab's VR is highly influenced by the Guatemala's operating environment, which will exert negative pressures on the bank's performance and prospects in the midterm, in the agency's opinion.

Sound Company Profile: Its VR is also highly influenced by the bank's good company profile. The institution focus on consumer lending with the risk control mechanism of collecting payments via payroll has enabled the bank to have a dominant market position in retail banking and allowed it to register a constant and stable financial income stream.

Environment Pressures Good Asset Quality: Fitch Ratings believes Bantrab is not exempt from the asset quality pressures borne out of the current deep global recession scenario. As of April 30, 2020, the core metric of impaired loans (90+ days overdue) over gross loans is a low 1.58%, slightly up from YE19 of 1.39%. Bantrab primarily focuses on loans to public sector employees who are deemed as less sensitive to the increase in unemployment.

Profitability Affected by Less Business Volume: Fitch foresees a reduction in income mainly due to less business volume; despite a high percentage of loans deducted via payroll, we do not disregard a decline in earnings if the contingency extends itself longer than expected. As of fiscal 2019, operating RORWA was an advantageous 5.1%.

Solid Equity: Fitch also recognizes Bantrab's sound capitalization, the highest among its peers in the Guatemalan financial industry, which provides the bank with a strong loss absorption capacity. As of YE19, FCC is at a peak of nearly 20%, which indicates the bank is better prepared to face an adverse scenario.

Concentrated Funding Structure and Adequate Liquidity: Bantrab's deposit structure is based on term deposits of highly renewable rate. As part of its business model, the bank's liability cost is higher than the system average, but with a favorable downwards trend. As of April 2020, customer deposits grew 2.4% compared to December 2019. As of 1Q20, L-to-D ratio was 67.85% as of 1Q20, slightly better than YE19 of 69.41%.

Rating Sensitivities

Factors that could, individually or collectively, lead to a negative rating action/downgrade:

- VR, IDR and National Ratings could be downgraded if the deteriorating financial profile of these entities caused by the pandemic turns out to be significantly more important than anticipated with an operating profit to RWAs consistently below 2% and/or a decline in capitalization (FCC/RWA close to 12%). Ratings are also sensitive to a downgrade of the sovereign rating.

Factors that could, individually or collectively, lead to a positive rating action/upgrade:

- There is limited upside potential given that ratings are at the sovereign level. Bantrab's IDRs and National Ratings could be affirmed and their Negative Rating Outlooks revised to Stable if the level of economic disruption from the coronavirus outbreak does not significantly deteriorate its financial metrics, especially in terms of asset quality and earnings and profitability.

Ratings

Foreign Currency

Long-Term IDR	BB-
Short-Term IDR	B

Local Currency

Long-Term IDR	BB-
Short-Term IDR	B
Viability Rating	bb-
Support Rating	5
Support Rating Floor	NF

National

National Long-Term Rating	A-(gtm)
National Short-Term Rating	F2(gtm)

Sovereign Risk

Long-Term Foreign Currency IDR	BB-
Long-Term Local Currency IDR	BB-
Country Ceiling	BB

Outlooks

Long-Term Foreign Currency IDR	Negative
Long-Term Local Currency IDR	Negative
National Long-Term Rating	Negative
Sovereign Long-Term Foreign Currency IDR	Stable
Sovereign Long-Term Local Currency IDR	Stable

Applicable Criteria

[National Scale Rating Criteria \(June 2020\)](#)

[Bank Rating Criteria \(February 2020\)](#)

Related Research

[Guatemala \(April 2020\)](#)

Analysts

Jose Berrios
+1 212 908 9189
jose.berrios@fitchratings.com

Alvaro Castro
+503 2516 6615
alvaro.castro@fitchratings.com

Issuer Ratings (Including Main Issuing Entities)

Rating Level	Rating
Long-Term Foreign-Currency IDR	BB-
Short-Term Foreign-Currency IDR	B
Long-Term Local-Currency IDR	BB-
Short-Term Local-Currency IDR	B
Viability Rating	bb-
Support Rating	5
Support Rating Floor	NF
National Long-Term Rating	A-(gtm)
National Short-Term Rating	F2(gtm)
Outlook	Negative

Source: Fitch Ratings.

Significant Changes

Measures Implemented for Mitigating Pandemic Crisis

The Guatemalan government and central bank have adopted several measures to mitigate the current health crisis. These include central bank cuts to monetary policy interest rates, actions focused on maintaining FX rates, easing restructuring requirements without affecting regulatory risk category and payment deferrals; loans will be considered impaired until 180 days past due, allowing the banks to use reserves for eventualities and a temporary change in the accounting standard of loan income from perceived to accrued, among others.

Bantrab's Negative Rating Outlook reflects Fitch's opinion that operating environment uncertainty and limited economic growth amid the coronavirus pandemic poses increased pressure to the bank's financial performance and prospects.

Fitch believes that Bantrab has shown a positive evolution in its management strategy and that its governance structure demonstrates independence and effectiveness.

Key Latest Developments

Operating Environment

On April 3, 2020, Fitch Ratings downgraded Guatemala's Long-Term Foreign-Currency Issuer Default Rating (IDR) to 'BB-' from 'BB' and revised the Rating Outlook to Stable from Negative. The downgrade of Guatemala's IDRs reflects diminishing fiscal flexibility due to the government's low tax collection amid continuous political gridlock preventing forceful fiscal measures, as well as a downward revision to economic growth prospects related to the global pandemic.

In Fitch's opinion, the local financial institutions' performance is highly influenced by the Guatemalan operating environment, which presents uncertainty in terms of magnitude and the scope that potential effects from the health crisis could have over entities' operations and developments. Therefore, we find that the operating environment's outlook remains negative given how the current coronavirus pandemic could affect economic growth, remittances, formal employment, among others, weakening the financial profile of the banks. At the first stages of the COVID-19 outbreak, Fitch believed impairment could be observed in the loan quality and some entities' profitability; furthermore, certain pressures could arise on their capital levels and funding sources.

Brief Company Summary and Qualitative Evaluation Factors

Effective Business Model

Bantab's particular business model, focused on consumer finance via payroll deduction ensures the bank will have a constant, stable main income stream. Also, the bank explores other business segments in order to fulfill its purpose to serve the entire Guatemalan workforce via an expanded product range.

Banco de los Trabajadores



Banks
Ratings Navigator

	Peer Ratings	Operating Environment	Company Profile	Management & Strategy	Risk Appetite	Asset Quality	Earnings & Profitability	Capitalisation & Leverage	Funding & Liquidity	Viability Rating	Support Rating Floor	Issuer Default Rating
aaa										aaa	AAA	AAA
aa+										aa+	AA+	AA+
aa										aa	AA	AA
aa-										aa-	AA-	AA-
a+										a+	A+	A+
a										a	A	A
a-										a-	A-	A-
bbb+										bbb+	BBB+	BBB+
bbb										bbb	BBB	BBB
bbb-										bbb-	BBB-	BBB-
bb+										bb+	BB+	BB+
bb										bb	BB	BB
bb-										bb-	BB-	BB-
b+										b+	B+	B+
b										b	B	B
b-										b-	B-	B-
ccc+										ccc+	CCC+	CCC+
ccc										ccc	CCC	CCC
ccc-										ccc-	CCC-	CCC-
cc										cc	CC	CC
c										c	C	C
f										f	NF	D or RD

As of December 2019, Bantrab ranks sixth in terms of loan portfolio and total assets, fifth in total customer deposits and equity and is the third largest in terms of net profits.

Sound Management & Corporate Governance

The bank's management team, heavily renewed since 2017, shows ample and deep knowledge of the banking business and shows signs of a sound consolidation that reflects in a well-planned and cohesive strategy that has yielded good results. Also, its particular corporate governance framework is very well regulated, transparent and democratic, in accordance to the bank's organic law and shows no signs of the weaknesses that resulted in a series of reputational risk events in 2016. Fitch expects the corporate governance framework to remain effective.

Fitch believes that the current pandemic poses risks that may hamper the execution of strategy due to a rapidly shifting operating and business environment. Nonetheless, the agency believes that Bantrab's business and financial results may reflect its business model's strengths, namely the mitigation of credit-related risks via its payroll deduction scheme on loans given to market segments with high levels of job stability such as public sector employees in education, security and health services.

Effective Risk Policies & Controls

Fitch believes that the bank's risk management committees and commissions are generally effective. Favorably, these decision-making groups exclude staff that may have a conflict of interest; the bank's president does not also participate in any of these groups since the role has exhibited a recent history of high turnover. Also, the composition of each committee or commission ensures that no director leads a higher number than others, ensuring the mitigation of potential concentration of power.

Bar Chart Legend

Vertical bars – VR range of Rating Factor

Bar Colors – Influence on final VR

- Higher influence
- Moderate influence
- Lower influence

Bar Arrows – Rating Factor Outlook

- Positive
- Negative
- Evolving
- Stable

Summary Financials and Key Ratios

	2019 ^a		2018 ^a		2017 ^a		2016 ^a	
	USD Mil.	GTQ Mil.	GTQ Mil.	GTQ Mil.	GTQ Mil.	GTQ Mil.	GTQ Mil.	GTQ Mil.
(Years Ended Dec. 31)	Audited – Unqualified (Emphasis of Matter)	Audited – Unqualified (Emphasis of Matter)	Reviewed – Unqualified (Emphasis of Matter)	Audited – Unqualified (Emphasis of Matter)	Audited – Unqualified (Emphasis of Matter)	Audited – Unqualified (Emphasis of Matter)	Audited – Unqualified (Emphasis of Matter)	Audited – Unqualified (Emphasis of Matter)
Summary Income Statement								
Net Interest and Dividend Income	230	1,770.4	1,472.1	1,468.3	1,468.3	1,468.3	1,468.3	1,276.4
Net Fees and Commissions	16	120.3	65.2	149.4	149.4	149.4	149.4	143.4
Other Operating Income	0	0.4	(26.8)	(48.5)	(48.5)	(48.5)	(48.5)	4.4
Total Operating Income	246	1,891.0	1,510.5	1,569.2	1,569.2	1,569.2	1,569.2	1,424.3
Operating Costs	120	922.7	834.0	953.6	953.6	953.6	953.6	889.7
Pre-Impairment Operating Profit	126	968.2	676.5	615.7	615.7	615.7	615.7	534.5
Loan and Other Impairment Charges	25	195.3	164.8	74.7	74.7	74.7	74.7	14.3
Operating Profit	100	773.0	511.7	541.0	541.0	541.0	541.0	520.3
Other Non-Operating Items (Net)	7	53.3	52.3	25.8	25.8	25.8	25.8	(5.7)
Tax	17	127.8	51.2	73.6	73.6	73.6	73.6	79.3
Net Income	91	698.5	512.8	493.1	493.1	493.1	493.1	435.3
Other Comprehensive Income	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Fitch Comprehensive Income	91	698.5	512.8	493.1	493.1	493.1	493.1	435.3
Summary Balance Sheet								
Assets								
Gross Loans	1,852	14,258.3	13,343.0	12,216.2	12,216.2	12,216.2	12,216.2	10,876.2
- Of Which Impaired	26	198.0	253.0	354.4	354.4	354.4	354.4	290.9
Loan Loss Allowances	33	251.6	280.5	367.7	367.7	367.7	367.7	401.9
Net Loans	1,819	14,006.6	13,062.5	11,848.4	11,848.4	11,848.4	11,848.4	10,474.3
Interbank	391	3,007.6	3,035.6	2,874.2	2,874.2	2,874.2	2,874.2	1,259.1
Derivatives	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Other Securities and Earning Assets	1,083	8,337.5	7,611.1	5,891.9	5,891.9	5,891.9	5,891.9	5,614.9
Total Earning Assets	3,293	25,351.7	23,709.2	20,614.6	20,614.6	20,614.6	20,614.6	17,348.3
Cash and Due From Banks	22	169.8	139.6	160.3	160.3	160.3	160.3	127.2
Other Assets	100	767.9	766.6	793.1	793.1	793.1	793.1	767.2
Total Assets	3,415	26,289.4	24,615.4	21,568.0	21,568.0	21,568.0	21,568.0	18,242.8
Liabilities								
Customer Deposits	2,668	20,541.2	19,652.4	17,165.8	17,165.8	17,165.8	17,165.8	14,357.9
Interbank and Other Short-Term Funding	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	0.0
Other Long-Term Funding	150	1,154.8	1,161.1	1,101.8	1,101.8	1,101.8	1,101.8	1,128.3
Trading Liabilities and Derivatives	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	0.8
Total Funding	2,818	21,696.0	20,813.5	18,267.5	18,267.5	18,267.5	18,267.5	15,487.0
Other Liabilities	166	1,275.4	1,093.4	985.2	985.2	985.2	985.2	905.5
Preference Shares and Hybrid Capital	20	157.6	156.6	157.6	157.6	157.6	157.6	157.6
Total Equity	411	3,160.4	2,551.9	2,157.7	2,157.7	2,157.7	2,157.7	1,692.7
Total Liabilities and Equity	3,415	26,289.4	24,615.4	21,568.0	21,568.0	21,568.0	21,568.0	18,242.8

^aExchange rate: 2019 - USD1 = GTQ7.70; 2018 - USD1 = GTQ7.70; 2017 - USD1 = GTQ7.30; 2016 - USD1 = GTQ7.50; 2015 - USD1 = GTQ7.70. N.A. - Not applicable.
Source: Fitch Ratings, Fitch Solutions, Bantrab.

Summary Financials and Key Ratios

Ratios (% Annualized as Appropriate)	2019	2018	2017	2016
Profitability				
Operating Profit/Risk-Weighted Assets	5.1	3.7	4.3	4.5
Net Interest Income/Average Earning Assets	7.6	6.5	7.8	7.6
Non-Interest Expense/Gross Revenue	48.8	55.2	60.8	62.5
Net Income/Average Equity	24.9	21.3	25.7	26.2
Asset Quality				
Impaired Loans Ratio	1.4	1.9	2.9	2.7
Growth In Gross Loans	6.9	9.2	12.3	25.8
Loan Loss Allowances/Impaired Loans	127.1	110.9	103.8	138.1
Loan Impairment Charges/Average Gross Loans	1.4	1.2	0.6	0.2
Capitalization				
Common Equity Tier 1 Ratio	N.A.	N.A.	N.A.	N.A.
Fully Loaded Common Equity Tier 1 Ratio	N.A.	N.A.	N.A.	N.A.
Fitch Core Capital Ratio	19.6	16.4	14.5	12.4
Tangible Common Equity/Tangible Assets	11.6	9.7	9.0	8.2
Basel Leverage Ratio	N.A.	N.A.	N.A.	N.A.
Net Impaired Loans/Common Equity Tier 1	N.A.	N.A.	N.A.	N.A.
Net Impaired Loans/Fitch Core Capital	(1.8)	(1.2)	(0.7)	(7.8)
Funding and Liquidity				
Loans/Customer Deposits	69.4	67.9	71.2	75.8
Liquidity Coverage Ratio	N.A.	N.A.	N.A.	N.A.
Customer Deposits/Funding	94.0	93.7	93.2	91.8
Net Stable Funding Ratio	N.A.	N.A.	N.A.	N.A.

N.A. - Not applicable.

Source: Fitch Ratings, Fitch Solutions, Bantrab.

Key Financial Indicators – Recent Developments

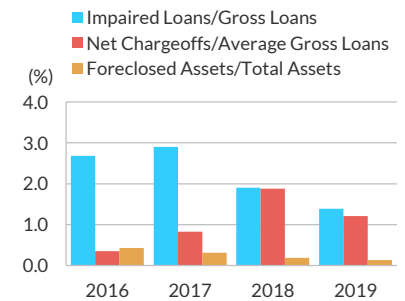
Asset Quality

Bantrab has historically showed better asset quality metrics than the other five major Guatemalan banks due to its payroll collection scheme. However, and despite its improving figures as of YE19, Fitch believes it is not exempt of the asset quality pressures born out of the current deep global recession scenario. As of April 30, 2020, the core metric of impaired loans over gross loans is a low 1.58%, slightly up from YE19 of 1.39%.

While the majority of loans have been granted to customers that work in stable institutions of the public sector, the agency does not rule out that a deceleration of credit growth could affect overall loan quality to a relatively small extent. Complementary, the small, albeit growing, proportion of nonpayroll-collected loans such as credit cards and loans to entrepreneurs are naturally more prone to deterioration.

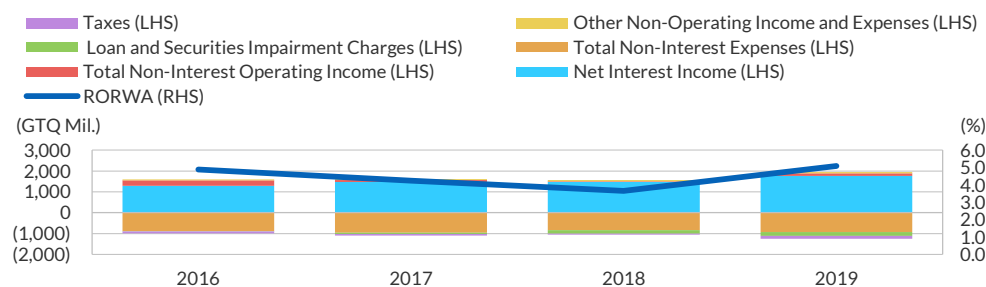
In addition, NPL coverage is sufficient at 127.1% and compares above the bank's 2016–2018 average of 117.6%. Due to the nature of its business, the bank's loan portfolio is highly granular, with concentrations representing only 0.95% of total loans and 4.6% of FCC while real guarantees are nearly minimal at approximately 1.7% of total gross loans.

Loan Portfolio Quality



Source: Fitch Ratings, Fitch Solutions, Bantrab.

Income Statement Structure



RORWA – Operating profit/risk -weighted assets.
Sources: Fitch Ratings, Fitch Solutions, Bantrab.

Fitch believes that Bantrab's historical concentration in the public sector will effectively decrease in a slow, progressive way due to the refocused risk policies, which aim to fulfil the bank's mission of providing financial products and services to all the Guatemalan working force, beyond selected public service institutions. The good asset quality is also reflected in insignificant levels of restructured loans, which represent 0.27%.

Earnings and Profitability

The agency foresees a reduction of income mainly due to less business volume; also, despite its high percentage a loans deducted via payroll, Fitch does not discard affectations in this matter if the contingency extends itself longer than expected. Also, the percentage of loans not collected via payroll, such as loans to entrepreneurs and most credit cards, albeit minimal, could affect the bank's cash flow as they have a higher chance of becoming overdue.

As of 1Q20, net ROAA was 2.77%, in line with YE19 of 2.72%. As of fiscal 2019, operating RORWA was a favorable 5.1%, well above the system average of the 2.4% of the banking industry.

NIM has improved due to both the adequate pricing of its products and services in accordance to its target segments and to the effectiveness of its customer deposit repricing tactics. As of YE19, NIM was 7.55%, higher than its recent history (2016–2018 average of 7.31% and the system median of 5.30%). Moreover, these increased revenues combined with sound administrative practices yielded good operational efficiency ratios, where expenses represented a relatively low proportion of 48.8% of total gross revenues. LICs represented 20.2% of pre-impairment operating profit, a slight improvement from 2018's 24.4%.

Fitch notes how income diversification is higher than the industry average, mainly due to loan-related fees: Overall non-interest income represented 6.4% of gross revenues, well above the total bank's average of 2.55%.

Capitalization and Leverage

Bantrab is characterized by its sound capitalization, the highest among its Guatemalan peers, which provides the bank with a strong loss absorption capacity. This assumes a particular relevance due to the current climate. As of 1Q20, FCC is at a historic peak of nearly 20%, which indicates the bank could comfortably face an adverse scenario. Also, equity over assets was 11.96%, similar to YE19 of 12.02%.

Pay-outs are consistently low, keeping equity growth higher than total asset growth (23.8% versus 6.8%). Fitch expects Bantrab to continue to record healthy capitalization levels in the medium term with a Fitch Core Capital above 16%, higher than the industry average.

Most of the dividend payments are related to the bank’s preferential shares,. Common dividend payments are accumulated in accounts payable that grow each year, ceasing to be part of the capital.

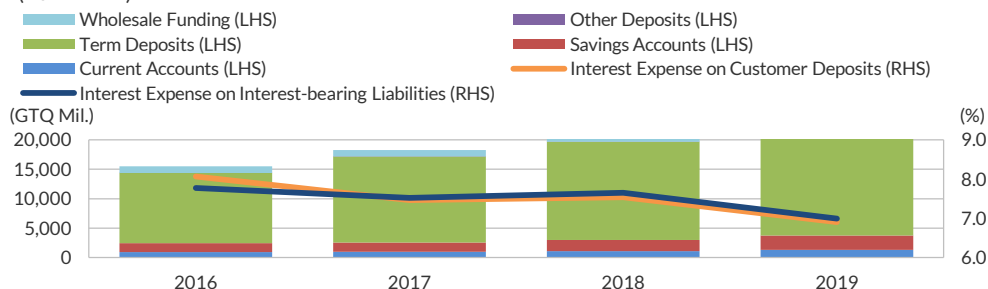
The bank’s preferential shares do not receive equity credit according to Fitch’s criteria. The B series of these shares have been and remain seized by the Guatemalan authorities since the investor is currently under investigation alongside a number of former bank officials and are expected to become void in a judicial process. In case these shares were to be paid to the Guatemalan government, the bank’s equity ratios would not be affected materially

Funding and Liquidity

Bantrab’s deposit structure, albeit based on term deposits of a highly renewable rate, is deeply concentrated, especially on governmental institutions and professional associations. Moreover, as part of its business model, the bank has a higher liability cost than the system average but with a favorable downwards trend. As of 1Q20, the bank had favorably established contingency credit lines and is in the process of acquiring more. L-to-D ratio was 67.85% as of 1Q20, slightly better than YE19 of 69.41%.

Funding Structure

(As of YE19)



Source: Fitch Ratings, Fitch Solutions, Bantrab.

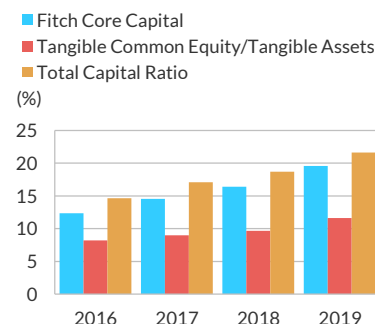
Bantrab’s funding structure is primarily based on stable customer deposits, particularly term deposits (around 80% of total funding) with high renewal rates (95%). Positively for the bank, its repricing of term deposits as they become due has proven effective in reducing overall liability cost, thus aiding NIM growth, while still keeping its differentiation in terms of cost compared to the banking system.

Concentration in the 20 largest depositors is high and in line with previous years at around 29% of total deposits. This is due to the institutional depositors with which the bank has business relationships and whose employees it services. Most of the institutional depositors are public entities, while the majority of Bantrab’s clients are individuals.

Bantrab’s funding also includes some alternative sources of financing. Noteworthy is a seven-year loan from Deutsche Bank AG’s London branch for USD150 million at a fixed rate. Deutsche Bank AG obtained the funds for the loan by successfully issuing instruments in the international capital markets through a special purpose vehicle (Bantrab Senior Trust or BST) that reflects the conditions of the loan. BST is scheduled for payment on November 2020.

Liquidity is high, favored by the stability of its deposits throughout the economic cycles. Liquid asset (cash and equivalents) coverage of total deposits is higher than the Guatemalan financial

Fitch Core Capital



Source: Fitch Ratings, Fitch Solutions, Bantrab.

sector: 49% versus 42%. Most liquid assets are sovereign-related instruments available for sale. Fitch believes that their marketability may be limited in a systemic stress scenario.

Sovereign Support

Bantrab's Support Rating of '5' and Support Rating Floor of NF are based on the uncertainty of obtaining external support, given the government's low ownership in Bantrab and the bank's limited systemic importance.

Support Rating Floor		Value		
Typical D-SIB SRF for sovereign's rating level (assuming high propensity)		BB- or B+		
Actual country D-SIB SRF		BB		
Support Rating Floor:		NF		
Support Factors	Positive	Neutral	Negative	
Sovereign ability to support system				
Size of banking system relative to economy	✓			
Size of potential problem		✓		
Structure of banking system			✓	
Liability structure of banking system		✓		
Sovereign financial flexibility (for rating level)		✓		
Sovereign propensity to support system				
Resolution legislation with senior debt bail-in		✓		
Track record of banking sector support		✓		
Government statements of support		✓		
Sovereign propensity to support bank				
Systemic importance			✓	
Liability structure of bank	✓			
Ownership		✓		
Specifics of bank failure		✓		
Policy banks				
Policy role				
Funding guarantees and legal status				
Government ownership				

Environmental, Social and Governance Considerations

The highest level of environmental, social and governance (ESG) credit relevance, if present, is a score of 3. This means ESG issues are credit-neutral or have only a minimal credit impact on the entity(ies), either due to their nature or to the way in which they are being managed by the entity(ies). For more information on Fitch's ESG Relevance Scores, visit www.fitchratings.com/esg.

FitchRatings Banco de los Trabajadores

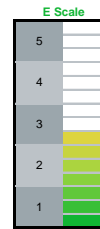
Banks
Ratings Navigator

Credit-Relevant ESG Derivation

Banco de los Trabajadores has 6 ESG potential rating drivers			Overall ESG Scale		
<ul style="list-style-type: none"> ➤ Banco de los Trabajadores has exposure to impact of extreme weather events on assets and/or operations and corresponding risk appetite & management; catastrophe risk; credit concentrations but this has very low impact on the rating. ➤ Banco de los Trabajadores has exposure to compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection (data security) but this has very low impact on the rating. ➤ Governance is minimally relevant to the rating and is not currently a driver. 	key driver	0	issues	5	
	driver	0	issues	4	
	potential driver	6	issues	3	
	not a rating driver	3	issues	2	
		5	issues	1	

Environmental (E)

General Issues	E Score	Sector-Specific Issues	Reference
GHG Emissions & Air Quality	1	n.a.	n.a.
Energy Management	1	n.a.	n.a.
Water & Wastewater Management	1	n.a.	n.a.
Waste & Hazardous Materials Management; Ecological Impacts	1	n.a.	n.a.
Exposure to Environmental Impacts	3	Impact of extreme weather events on assets and/or operations and corresponding risk appetite & management; catastrophe risk; credit concentrations	Company Profile; Management & Strategy; Risk Appetite; Asset Quality



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.

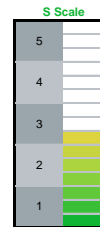
The Credit-Relevant ESG Derivation table shows the overall ESG score. This score signifies the credit relevance of combined E, S and G issues to the entity's credit rating. The three columns to the left of the overall ESG score summarize the issuing entity's sub-component ESG scores. The box on the far 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.

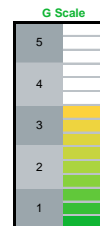
Social (S)

General Issues	S Score	Sector-Specific Issues	Reference
Human Rights, Community Relations, Access & Affordability	2	Services for underbanked and underserved communities: SME and community development programs; financial literacy programs	Company Profile; Management & Strategy; Risk Appetite
Customer Welfare - Fair Messaging, Privacy & Data Security	3	Compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection (data security)	Operating Environment; Company Profile; Management & Strategy; Risk Appetite
Labor Relations & Practices	2	Impact of labor negotiations, including board/employee compensation and composition	Company Profile; Management & Strategy
Employee Wellbeing	1	n.a.	n.a.
Exposure to Social Impacts	2	Shift in social or consumer preferences as a result of an institution's social positions, or social and/or political disapproval of core banking practices	Company Profile; Financial Profile



Governance (G)

General Issues	G Score	Sector-Specific Issues	Reference
Management Strategy	3	Operational implementation of strategy	Management & Strategy
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	Management & Strategy; Earnings & Profitability; Capitalisation & Leverage
Group Structure	3	Organizational structure: appropriateness relative to business model; opacity; intra-group dynamics; ownership	Company Profile
Financial Transparency	3	Quality and frequency of financial reporting and auditing processes	Management & Strategy



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.

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