

# New York Life Insurance Company

## Key Rating Drivers

**Leading Market Position:** New York Life Insurance Company (New York Life) is a leading producer of whole life insurance and guaranteed income annuities, and also maintains a leading market position in the group life and disability insurance market. New York Life's market position is strengthened by its loyal and productive career agency distribution channel, which Fitch Ratings believes reduces pricing pressure and anti-selection in competitive market environments.

**Product Diversification:** New York Life's mix of individual and group life insurance, annuities and asset management products provides diversification of mortality, longevity and interest rate risks, which Fitch views favorably. New York Life has modest exposure to some product lines that Fitch considers to have significant risks, such as long-term care (LTC) insurance. However, the company is well reserved and has demonstrated strong risk management practices with regards to those lines.

**Extremely Strong Capital Levels:** We view New York Life's statutory capitalization as extremely strong based on a 2023 Prism Capital Model score of 'Extremely Strong', which is consistent with the prior year, and a year-end (YE) 2023 RBC ratio of 472% and conservative operating leverage.

In addition, the company uses the New York regulator's prescribed reserve calculations, which incorporate more conservative reserving practices relative to the National Association of Insurance Commissioners (NAIC)-based calculation. New York Life's use of financial leverage remains relatively modest at 13% as measured by surplus notes to total adjusted capital (TAC).

**Stable Operating Results:** New York Life's diversity of earnings and the participating nature of its core products result in strong and relatively stable earnings. New York Life's financial performance is partially suppressed by the company's focus on maintaining extremely strong capital levels and commitment to returning profits to policyholders, with New York Life paying a record \$2.2 billion in dividends to policyholders in 2023.

Statutory results in 2023 improved from 2022 driven by strong top-line growth following very strong insurance sales and growth in assets under management, and Fitch calculates that the company's year-end (YE) return on statutory capital after dividends was 2.1%.

**Manageable Asset Risk:** New York Life's risky assets ratio is slightly above the broader life industry average at 97% at YE23. However, the ratio is in line with similarly rated mutual peers with participating products and remained relatively steady over recent years. When adjusting for the risk sharing characteristics of the company's participating whole life policies, the company's risky asset ratio was 75% at YE23. Credit impairments remain low, and Fitch expects them to remain below historical averages, although a prolonged or severe downturn could negatively affect investment performance.

**Macroeconomic Environment:** We expect the current higher interest rate environment to be broadly positive for underlying investment performance, but it has the potential to drive some adverse policyholder behavior, although the participating nature of New York Life's life insurance policies should mitigate this effect.

Continued market turbulence could also lead to lower assets under management and therefore lower earnings from New York Life Investment Management. However, Fitch does not expect a material impact on New York Life's earning or capital outside of a prolonged or severe recession.

## Ratings

### New York Life Insurance Company

Insurer Financial Strength	AAA
Long-Term IDR	AA+
Note: See additional ratings on page 8	

### Outlooks

Insurer Financial Strength	Stable
Long-Term IDR	Stable

### Debt Ratings

Subordinated Long-Term Rating	AA
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## Financial Data

### New York Life Insurance Co.

(\$ Mil.)	2022	2023
Total Adjusted Capital (TAC)	31,125	33,008
Surplus Notes Outstanding	4,232	4,232
Statutory Net Income	-1,127	805
Operating Return on TAC (%)	-3.0	2.1
RBC (%)	448	472

Note: Reported on a U.S. statutory basis.  
Source: Fitch Ratings, New York Life

## Applicable Criteria

[Insurance Rating Criteria \(March 2024\)](#)

## Related Research

[Global Insurance Mid-Year Outlook 2024 \(June 2024\)](#)

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## Rating Sensitivities

### Factors that Could, Individually or Collectively, Lead to Negative Rating Action/Downgrade

- A decline in capitalization that includes a Prism capital model score below 'Extremely Strong' or an NAIC RBC ratio below 450%;
- A sustained increase in surplus notes to TAC above 15% could result in wider notching between New York Life's IFS rating and the ratings of the surplus notes, while an increase in surplus notes to TAC to above 20% could result in a downgrade of all ratings;
- Statutory fixed charge coverage below 4.5x;
- An unexpected shift in tax, regulatory or market dynamics that weakens its competitive strengths.

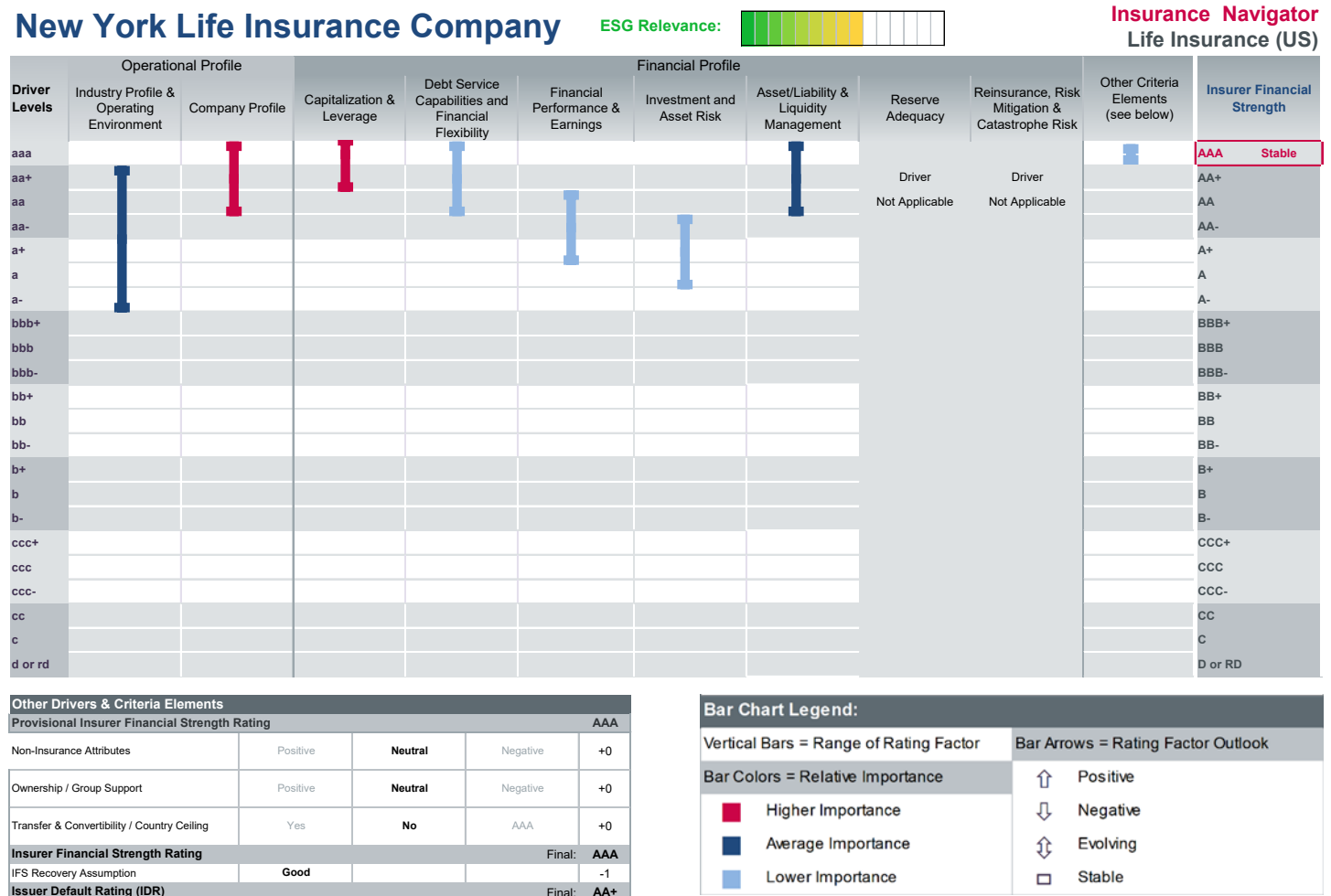
### Factors that Could, Individually or Collectively, Lead to Positive Rating Action/Upgrade

New York Life achieved Fitch's highest rating level and therefore has no positive rating sensitivities.

## Latest Developments

New York Life continues to perform in line with Fitch's expectations and, as a result, there have been no changes to the key rating drivers since the last rating review.

## Key Rating Drivers - Scoring Summary



## Company Profile

### Large, Well-Diversified Mutual Insurer

Fitch views New York Life as having a most favorable business profile relative to the broader North American life insurance market. As a result, Fitch scores New York Life's company profile at 'aa+' based on the application of Fitch's insurance criteria and the belief that no insurance company will be scored above the 'aa' category.

One of New York Life's key competitive advantages is its loyal and productive career agency distribution channel. Fitch believes this distribution strategy reduces pricing pressure and anti-selection in competitive market environments. The company targets middle-market and mass-affluent customers, with a particular focus on higher growth cultural markets and women.

New York Life is one of the largest life insurance companies in the U.S. and Mexico, with approximately \$425 billion in total assets and \$33 billion in TAC as of Dec. 31, 2023. The company is a leading producer of whole life insurance and guaranteed income annuities, and has a leading presence in the group life and disability insurance market with New York Life Group Benefit Solutions (GBS) business accounting for 7.1% of total statutory revenue. New York Life also offers fixed annuities, variable annuities (VAs) with minimal living benefit exposure and participating individual LTC.

New York Life's risk management is robust with respect to planning, investment and business strategies. The company offers relatively conservative product features and maintains a strong capital position to offset risks related to various stress scenarios. New York Life's exposure to LTC is limited relative to the industry, and Fitch believes that the risk in legacy business is being appropriately managed.

Diversified revenue streams allow the company to emphasize or de-emphasize certain products in favorable or challenging economic scenarios and reduce its overall dependence on any single product. New York Life's mix of life insurance, disability insurance, annuities, supplemental life and health and asset management products provides diversification of mortality, longevity and interest rate risks.

### Neutral Corporate Governance and Management

New York Life's corporate governance and management is scored as neutral, and, as such, no adjustment is made to New York Life's business profile subscore in the overall company profile score. New York Life's board follows industry standard practices regarding composition and committees, and 11 of the 12 board members are independent. PricewaterhouseCoopers is New York Life's auditor, and the audit opinion for 2023 was unqualified.

New York Life and its insurance subsidiaries report their results under statutory accounting principles permitted as prescribed by their respective states of domicile. There are no known criminal or civil matters that would affect Fitch's opinion of corporate governance and management.

### Company Profile Scoring Summary

	Assessment	Subscore/Impact
Business Profile Assessment	Most Favorable	aa+
Corporate Governance Assessment	Neutral	0 notches
Company Profile Factor Score	—	aa+

Source: Fitch Ratings

## Ownership

Fitch views the ownership structure of mutual insurance companies favorably, as it aligns the interests of management with those of policyholders, but is neutral to the rating overall. Fitch believes that the company's ownership structure generally allows management to maintain more conservative capital levels and pursue a more conservative operating strategy with a longer-term focus on growth.

## Capitalization and Leverage

### Extremely Strong Capitalization

Fitch considers New York Life's capitalization to be extremely strong, as evidenced by its 2023 Prism capital model score of 'Extremely Strong', which continues a multi-year trend. The company continues to demonstrate long-term

statutory capital growth, with statutory TAC growing 6% year-over year. New York Life also maintains a material capital cushion for extreme adverse scenarios. Non-risk based leverage metrics remain very strong and consistent with prior years.

The company's use of financial leverage increased in 2020 as a result of the GBS acquisition, but has continued to trend lower since then. As of YE23, New York Life's financial leverage was 13% as compared to 14% in 2022, and Fitch expects that financial leverage to decline as a result of growth in statutory capital.

New York Life's capital strength is bolstered by its strong capital quality. Surplus notes remain a reasonable percentage of capital, and the company makes only limited use of third-party reinsurance and does not utilize captive insurers to fund excess life reserves. Fitch also believes there is significant additional conservatism built into New York Life's balance sheet, given the more conservative reserving practices mandated by the New York State Department of Financial Services.

New York Life's reliance on capital markets funding is low, as demonstrated by its below industry average total financing and commitments ratio of 0.4x at YE 2023 and extremely strong capital levels.

### Financial Highlights

(\$ Mil.)	2022	2023
Total Adjusted Capital	31,125	33,008
RBC (%)	448	472
Asset Leverage (x)	13	13
Operating Leverage (x)	11	10
Surplus Notes/Total Adjusted Capital (%)	14	13

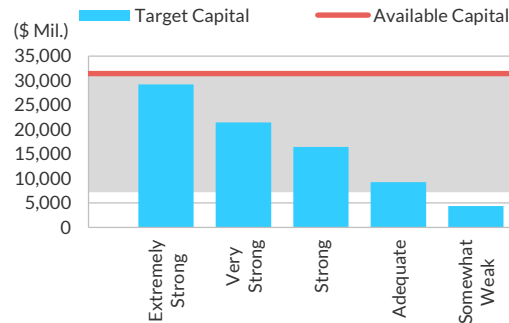
Note: Reported on a U.S. statutory basis.

Source: Fitch Ratings, New York Life Insurance Company

### Fitch's Expectations

- Based on expected capital growth, New York Life's overall capital position is expected to remain extremely strong, as measured by risk- and nonrisk-adjusted metrics.

### 2023 Prism Score — New York Life



AC – Available capital. TC – Target capital. Note: Shaded area represents the high and low of AC due primarily to unrealized gain/(loss) on fixed-income securities.

Source: Fitch Ratings.

### 2023 Prism Score — New York Life

(%)	2023
Prism Score	Extremely Strong
AC/TC at Prism Score	108

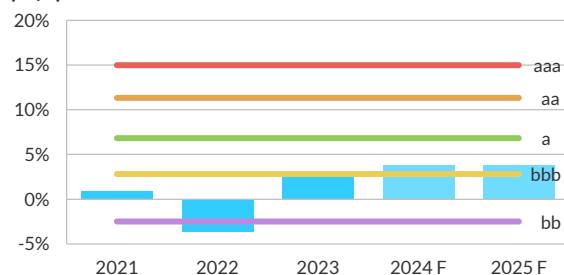
#### Target Capital Contributors

Life Insurance	35
Annuity	60
Accident and Health	8
Portfolio Scaling Adjustment	-2
Operational Risk	9
Diversification Benefit	-14

AC – Available capital. TC – Target capital.

Source: Fitch Ratings

### Performance: Return on Total Adjusted Capital (Life)



Source: Fitch Ratings, Company data

## Debt Service Capabilities and Financial Flexibility

### Very Strong Interest Coverage

Fitch views New York Life's coverage metrics as very strong, offset slightly by the company's lack of access to the public equity markets, although Fitch notes that New York Life is active in the capital markets.

In addition to the company's historical access to funding through the issuance of surplus notes, New York Life's wholly owned indirect subsidiary, New York Life Capital Corp., is authorized to issue up to \$3.5 billion of commercial paper (CP), which it does opportunistically to support the management of cash flows for investment and liquidity purposes. Outstanding CP balances are manageable and totaled \$499 million at YE 2023.

Additionally, New York Life maintains a revolving bank line of credit for \$1.75 billion under which both it and New York Life Capital Corporation are borrowers. There were no outstanding balances as of Dec. 31, 2023. New York Life Insurance Company has borrowing capacity of approximately \$11.5 billion at the Federal Home Loan Bank (FHLB) of New York, while its subsidiary, New York Life Insurance and Annuity Corporation (NYLIAC), is a member of the FHLB of Pittsburgh with borrowing capacity of \$6.8 billion as of YE 2023. As of Sept. 30, 2021, Life Insurance Company of North America became a member of the FHLB of Pittsburgh and had \$0.5 billion of borrowing capacity at YE 2023.

As a mutual company, New York Life's ability to raise equity capital is somewhat limited due to its inability to issue common stock. However, the company maintains an active medium-term note program domestically and internationally. Additionally, liquidity from New York Life's entire general account is available to service the company's outstanding surplus notes.

### Financial Highlights

	2022	2023
Adjusted Interest Expense (\$ Mil.)	218	218
Statutory Interest Coverage (x)	-3	6

Note: Reported on a U.S. statutory basis except where noted.

Source: Fitch Ratings, New York Life

## Financial Performance and Earnings

### Mutual Structure Dampens Returns

The diversity of New York Life's earning and the participating nature of its core products result in strong and relatively stable earnings. New York Life's financial performance is partially suppressed by extremely strong capital levels and the company's focus on returning profits to policyholders.

Beginning in 2022, the company ceased reporting results on a U.S. GAAP basis and began reporting key operating metrics on an adjusted statutory basis. At YE 2023, New York Life reported \$3.1 billion of adjusted statutory operating earnings, which was up 11%, compared with the prior year. New York Life continues to report complete statutory financial statements in accordance with statutory accounting principles as prescribed by New York, its state of domicile.

The current higher interest rate environment is expected to continue to benefit underlying investment performance, although continued volatility in capital markets may lead to modest asset outflows in New York Life's asset management business which would affect earnings from New York Life Investment Management. However, Fitch does not expect a material impact on New York Life's earnings or capital outside of a prolonged or severe recession.

New York Life's large life insurance business consistently accounts for the largest share of the company's earnings, with smaller contributions from annuities, asset management, and the group life and disability business. The participating nature of New York Life's large block of in-force whole life business allows the company to adjust dividend rates in times of severe stress to maintain strong target capital levels, while also providing a buffer that can be used to share investment performance with policyholders.

Other factors that enable New York Life to price its individual whole life products competitively, include low-lapse rates on its protection-based insurance products and a low expense base, aided by significant scale. Fitch believes that the company's low-lapse rate on its whole life products illustrates sound product design, competitive dividend rates, and strong relationships between New York Life's career agency system and its policyholders.

### Financial Highlights

(\$ Mil.)	2022	2023
Pretax Gain from Operations	-785	1,122
Net Income	-1,127	805
Pretax Operating ROA (%)	-0.2	0.3
Operating Return on Total Adjusted Capital (%)	-3.0	2.1
Growth in Revenues Before Realized Gains (%)	13.0	-9.8

Note: Reported on a U.S. statutory basis.  
 Source: Fitch Ratings, New York Life

### Fitch's Expectations

- Earnings are expected to benefit from improving investment performance in the higher rate environment.

## Investment and Asset Risk

### Manageable Asset Risk

New York Life manages a well-diversified, liquid investment portfolio that has continued to perform well through the recent market turbulence. The company's exposure to risky assets is above the industry average but in line with similarly rated mutual peers, with participating products that are structured to pass a portion of the company's investment performance on to policyholders. Adjusting for the participating nature of New York Life's liabilities, Fitch calculates the company's risky asset ratio to be 75% as compared to an unadjusted ratio of 97%.

New York Life's investment strategy takes a long-term view of its portfolio and its product liabilities. Under this strategy, the company maintains an above-average risky assets ratio (defined as below-investment-grade bonds, common stocks, select schedule BA assets and lower-quality mortgages as a percentage of TAC), primarily due to greater exposure to private equity limited partnerships. New York Life's above-average allocation to equities supports its participating whole life policies.

New York Life's \$38 billion commercial mortgage loan portfolio, which represents approximately 12% of total statutory cash and invested assets at YE 2023, is well diversified by both geography and property type. Loan quality remains favorable, as evidenced by attractive loan-to-value ratios and debt service coverage. and Fitch does not expect the portfolio to generate significant losses for the company in the current environment.

### Financial Highlights

(\$ Mil.)	2022	2023
Cash and Invested Assets	319,094	331,363
Below-Investment-Grade Bonds/TAC (%)	41	42
Risky Assets Ratio (%)	102	97
Investment Yield (%)	3.9	4.3

Note: Reported on a U.S. statutory basis.  
 Source: Fitch Ratings, New York Life

### Fitch's Expectations

- Fitch does not expect New York Life's commercial loan portfolio to generate meaningful losses despite material stress on the broader commercial real estate market.

## Asset/Liability and Liquidity Management

### Very Strong Asset/Liability and Liquidity Management

New York Life's asset/liability management and liquidity are considered very strong, with well-matched assets and liabilities and varied sources of contingent liquidity available. Fitch believes that New York Life effectively manages asset and liability risks through good product design, strict pricing discipline and actively managed duration. The company aims to minimize interest rate risk and currency risk through hedging. Fitch believes that the company is well positioned to manage the impact of rising interest rates.

New York Life is exposed to withdrawal/maturity risk through individual annuities and stable value products. Interest rate and disintermediation risks are well managed through cash flow matching and contract provisions. Liquidity risk in its institutional annuity products remains manageable, due to modest exposure to these products as of YE 2023. Overall, Fitch does not expect the current interest rate environment to put any pressure on New York Life's liquidity position absent an additional sudden, material upward shift in interest rates.

New York Life has a relatively small exposure to the VA business, which represents approximately 12% of total general and separate account reserves. Fitch views the risk profile of New York Life's VA business as more favorable than industry peers due to the limited amount of living benefit guarantees.

### Financial Highlights

	2022	2023
Liquidity Ratio (%)	60	59
Operating Cash Flow Coverage (x)	1.4	1.3
Public Bonds/Total Bonds (%)	57	56
Total Adjusted Liabilities and Deposits (\$ Mil.)	377,171	393,425
Risk-Weighted Liquidity Ratio (%)	186	194

Note: Reported on a U.S. statutory basis.  
 Source: Fitch Ratings, New York Life



## Appendix A: Peer Analysis

### Peer Comparison

Click [here](#) for a report that shows a comparative peer analysis of key rating driver scoring.

## Appendix B: Industry Profile and Operating Environment

### Industry Profile and Operating Environment (IPOE)

Click [here](#) for a link to a report that summarizes the main factors driving the above IPOE score.

## Appendix C: Other Rating Considerations

Below is a summary of additional ratings considerations that are part of Fitch's *Insurance Rating Criteria*.

### Group Insurance Financial Strength (IFS) Rating Approach

Fitch considers New York Life Insurance Company and its wholly owned subsidiaries, NYLIAC, New York Life Group Insurance Company of NY, Life Insurance Company of North America and NYLIFE Insurance Company of Arizona to be core entities based on their relative size and operating performance, as well as their history and expectation of contributing to the group's financial objectives. As such, Fitch utilizes a group rating methodology, and all of the entities are assigned the same rating based on the combined group assessment.

### Additional Ratings

	Rating Type	Rating
New York Life Insurance and Annuity Corporation	IFS	AAA
New York Life Group Insurance Company of NY	IFS	AAA
Life Insurance Company of North America	IFS	AAA
NYLIFE Insurance Company of Arizona	IFS	AAA
New York Life Global Funding	FABN	AAA
New York Life Funding	FABN	AAA
NYL Capital Corporation	CP	F1+

IFS – Insurer Financial Strength. FABN – Funding agreement-backed notes.  
 Source: Fitch Ratings

### Notching

For notching purposes, the regulatory environment of the U.S. is assessed by Fitch as being effective, and classified as following a ring-fencing 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 operating company IDR.

#### Hybrids – Operating Company

Notching of operating company surplus notes was based on a standard baseline recovery assumption of Below Average and a non-performance risk assessment of minimal. Thus, they are notched down by two from the operating company IFS, which is based on one notch for recovery and one notch for non-performance risk.

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

### Debt Maturities

(\$ Mil., as of June 30, 2024)	
2024	0
2025	0
2026	0
2027	0
2028 and Beyond	4,232
<b>Total</b>	<b>4,232</b>

Source: Fitch Ratings, New York Life



## Short-Term Ratings

New York Life's Short-Term Issuer Default Rating (IDR) was notched using standard long-term and short-term ratings equivalencies, per Fitch's criteria. Backup liquidity meets Fitch's liquidity guidelines.

New York Life's subsidiary, New York Life Capital Corp. (NYL CapCo), is authorized to issue \$3.5 billion in CP and serves solely as a funding vehicle for the company. At Dec. 31, 2023, the company had \$499 million of CP outstanding.

NYL CapCo's CP rating is directly related to the credit quality of its parent, New York Life, which provides explicit support to its subsidiary through a support agreement. The support agreement states that New York Life will (directly or through a wholly owned subsidiary) own and hold the entire legal title to and beneficial interest in all outstanding shares of capital stock of NYL CapCo.

## New York Life Global Fund and New York Life Funding Note Programs

The 'AAA' ratings on these and related issues recognizes that the trust obligations are secured solely by funding agreements issued by New York Life with cash flow structures that enable the trustees to pay the principal and interest on the notes. Thus, the note programs are dependent on New York Life's credit quality and are assigned a rating equal to the company's IFS rating.

## Hybrid - Equity/Debt Treatment

Fitch rates New York Life Insurance Company's surplus notes in line with the hybrid issue guidelines laid out in its Insurance Rating Criteria, and the securities are included as 100% debt in Fitch's calculation of financial leverage.

## Hybrids Treatment

Hybrid	Amount (\$ Mil.)	CAR Fitch (%)	CAR Reg. Override (%)	FLR Debt (%)
<b>New York Life Insurance Company</b>				
Surplus Notes Due 2039	1,000	0	100	100
Surplus Notes Due 2033	1,000	0	100	100
Surplus Notes Due 2069	1,000	0	100	100
Surplus Note Due 2050	1,250	0	100	100

CAR – Capitalization ratio. FLR – Financial leverage ratio. Note: 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.

Source: Fitch Ratings

## Recovery Analysis and Recovery Ratings

Not applicable.

## Transfer and Convertibility Risk (Country Ceiling)

None.

## Criteria Variations

None.

## About Fitch Forecasts

The forecasts shown in the main body of this report reflect Fitch's forward views from a credit perspective. They are based on a combination of Fitch's macroeconomic forecasts and viewpoints, outlook at the sector level and company-specific considerations developed by Fitch. As a result, Fitch's forecasts may differ, at times materially, from earnings and other guidance provided by a rated entity to the market. To the extent Fitch is aware of material, non-public information on likely future events, such as a planned recapitalization or M&A activity, Fitch will not reflect these likely future events in its forecasts. This practice is to assure that such material non-public information is not inadvertently disclosed. However, as relevant, such information is considered by Fitch as part of the broader ratings process.

## Appendix D: Environmental, Social and Governance Considerations

## Credit-Relevant ESG Derivation

## ESG Relevance to Credit Rating

New York Life Insurance Company has 6 ESG potential rating drivers

- New York Life Insurance Company 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.
- New York Life Insurance Company 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.

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) Relevance Scores

General Issues	E Score	Sector-Specific Issues	Reference	E Relevance
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) Relevance Scores

General Issues	S Score	Sector-Specific Issues	Reference	S Relevance
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) Relevance Scores

General Issues	G Score	Sector-Specific Issues	Reference	G Relevance
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 relevance scores range from 1 to 5 based on a 15-level color gradation. Red (5) is most relevant to the credit rating and green (1) is least relevant.

The **Environmental (E), Social (S) and Governance (G)** tables break out the ESG general issues and the sector-specific issues that are most relevant to each industry group. Relevance scores are assigned to each sector-specific issue, signaling the credit-relevance of the sector-specific issues to the issuer's overall credit rating. The Criteria Reference column highlights the factor(s) within which the corresponding ESG issues are captured in Fitch's credit analysis. The vertical color bars are visualizations of the frequency of occurrence of the highest constituent relevance scores. They do not represent an aggregate of the relevance scores or aggregate ESG credit relevance.

The **Credit-Relevant ESG Derivation** table's far right column is a visualization of the frequency of occurrence of the highest ESG relevance scores across the combined E, S and G categories. The three columns to the left of ESG Relevance to Credit Rating summarize rating relevance and impact to credit from ESG issues. The box on the far left identifies any ESG Relevance Sub-factor issues that are drivers or potential drivers of the issuer's credit rating (corresponding with scores of 3, 4 or 5) and provides a brief explanation for the relevance score. All scores of '4' and '5' are assumed to result in a negative impact unless indicated with a '+' sign for positive impact.

**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), the Sustainability Accounting Standards Board (SASB), and the World Bank.

## 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

The highest level of ESG credit relevance is a score of '3', unless otherwise disclosed in this section. A score of '3' means 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. Fitch's ESG Relevance Scores are not inputs in the rating process; they are an observation on the relevance and materiality of ESG factors in the rating decision. For more information on Fitch's ESG Relevance Scores, visit <https://www.fitchratings.com/topics/esg/products#esg-relevance-scores>.

## SOLICITATION & PARTICIPATION STATUS

For information on the solicitation status of the ratings included within this report, please refer to the solicitation status shown in the relevant entity's summary page of the Fitch Ratings website.

For information on the participation status in the rating process of an issuer listed in this report, please refer to the most recent rating action commentary for the relevant issuer, available on the Fitch Ratings website.

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