ARC RATINGS' CODE OF CONDUCT

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ARC
RATINGS

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1. INTRODUCTION

1.1. ARC Ratings' Code of Conduct reflects the measures, procedures and guiding principles followed by ARC Ratings' subsidiaries that assign credit ratings and other analytical products under the brand name "ARC Ratings." Throughout this Code of Conduct the expression "ARC Ratings" refer to these subsidiaries and the term "Ratings" refers to both credit ratings and other analytical products.

1.2. This Code of Conduct applies to ARC Ratings, to all its employees, and to all persons and entities that provide services to ARC Ratings and which, by reason of that provision of services, may have access to confidential information held by ARC Ratings.

1.3. ARC Ratings' credit ratings contribute to the reduction of the information asymmetry among borrowers, lenders and other market participants, thereby improving the risk/reward decision-making capabilities of investors globally, while allowing issuers to access capital markets at premiums commensurate with their objectively assessed credit risk.

1.4. This Code of Conduct reflects the Code of Conduct Fundamentals for Credit Rating Agencies issued in December 2004 by the International Organization of Securities Commissions (IOSCO) and its subsequent reviews, and the requirements of Regulation (EC) No. 1060/2009 of the European Parliament and of the Council of 16 September 2009 on credit rating agencies (Regulation 1060/2009), amended by Regulation (EU) No. 513/2011 of the European Parliament and of the Council, of 11 May, and Regulation (EU) No. 462/2013 of the European Parliament and of the Council, of 21 May, and the requirement of the Statutory Instrument 2019/266 – The Credit Rating Agencies (Amendment etc.) (EU Exit) Regulations 2019 made on 13 of February by HM Treasury, the U.S. Securities Exchange Act of 1934, as amended and the U.S. Credit Rating Agency Reform Act of 2006, as amended, as well as the Code of Conduct for Persons Providing Credit Rating Services issued by the Hong Kong Securities and Futures Commission dated June 2011.

1.5. ARC Ratings is committed to treating all employees and market participants with respect and dignity and believes in a work environment that is safe and free from harassment or other discrimination. ARC prohibits all forms of unlawful harassment and discrimination, including sexual harassment. These behaviours will not be tolerated under any circumstances and should be reported in accordance with this Code of Conduct.

1.6. Any exemptions from compliance with the principles set forth in this Code of Conduct and related methodologies and procedures are required to be approved in writing by ARC Ratings' subsidiary's Board of Directors.

1.7. The adoption and disclosure of this Code of Conduct does not mean that ARC Ratings is assuming any contractual or legal responsibility towards any entity arising from the Code of Conduct or related methodologies and procedures. ARC Ratings may at any time

change any provision of this Code of Conduct and will disclose this on www.arcratings.com.

2. CREDIT RATING AND OTHER ANALYTICAL PRODUCTS

2.1. ARC Ratings assigns credit ratings as well as other analytical products. The most current ARC Ratings' definitions and rating scales in effect are available at no charge on www.arcratings.com in the report "Credit Ratings and Other Analytical Products."

CREDIT RATING

2.2. The credit ratings assigned by ARC Ratings are independent and forward-looking opinions of the relative credit risks of financial obligations issued by various entities. The credit risk is the risk that an entity may not meet its financial obligations as they come due, i.e. the capacity and willingness of an entity/issuer to make all required interest and principal payments on a given obligation in a timely manner in accordance with its terms. Credit ratings express risk in relative rank order – they are an ordinal measure of credit risk whose probability of default or loss may vary through the credit cycle. They are issued using an established and defined ranking system of rating categories (rating scale). ARC Ratings' credit ratings may be short-term credit ratings, in which case they apply to financial commitments with initial maturity of up to one year, or long-term credit ratings, which apply to financial commitments with initial maturity of more than one year. ARC's credit ratings are determined using ARC's published rating criteria available at no charge on www.arcratings.com.

The below principles apply to ARC Ratings:

- information, including confidential information, is collected from a wide group of sources, and in particular from the entity who requested the rating, this information being used and treated by ARC Ratings with due care and attention;
- although all due care is taken in the collection, evaluation and treatment of the information, ARC Ratings cannot be held liable for its accuracy and ARC Ratings shall only assign Ratings if the information meets specified requirements;
- ARC Ratings reserves the right to not assign Ratings if it considers that the issuer or financial obligation is too complex to be subject to a simplified analysis or that the information available does not meet the specified information requirements deemed necessary by ARC Ratings to form an opinion;
- they do not constitute a recommendation or offer or solicitation to buy or sell any investments that may be mentioned, and are only one of the factors that investors may wish to consider;
- in accordance with regulatory requirements, ARC Ratings shall disclose on its website and make the necessary regulatory notification in respect of the entities, transactions or instruments that have been submitted to it for a credit rating that did not proceed

when ARC Ratings has actual notice that a public rating was assigned to that specific entity, transaction or instrument.

- in accordance with regulatory requirements, if the Applicant requests a Private Rating, that Private Rating is provided exclusively to the Applicant and is not intended for public disclosure or distribution by subscription. There may be instances where the Applicant may share ARC Ratings' Private Ratings with a limited number of third parties but only with prior authorisation and in the manner agreed by ARC Ratings and in accordance with regulatory requirements and ARC Rating's methodologies and procedures. If ARC Ratings provides a private rating, it should by prior written agreement entered into between it and the rated entity, prohibit the rated entity from disseminating such rating, or permitting its dissemination, to the public.
- all employees must follow the ARC Ratings' Organisation and Procedures Manual.

The below principles also apply specifically for ARC Ratings credit ratings:

- they do not directly address any risk other than credit risk, namely they do not take into account the interest rate, foreign exchange, liquidity or other market risks incurred by the investor;
- they are assigned considering a future evolution scenario which, although seeking to be conservative, inevitably entails risks and uncertainty;
- they are valid until they are withdrawn by ARC Ratings.

OTHER ANALYTICAL PRODUCTS

2.3. ARC also assigns Other Analytical Products, which are not credit ratings, and which use their own specific rating scale and in some cases are identified by a specific suffix. All ARC Ratings' Other Analytical Products are determined using ARC Ratings' published methodologies available at no charge on www.arcratings.com.

Other Analytical Products include Fund Ratings and Servicer Ratings, for example, which may be public or private and may be monitored or point-in time, while certain Other Analytical Products, such as Credit Assessments, are assigned only on a private, point--in--time basis and therefore only valid on the date of assignment with no obligation to maintain or monitor the assessment. The most current ARC Ratings' definitions and rating scales for Other Analytical Products in effect are available at no charge on www.arcratings.com in the report "Credit Ratings and Other Analytical Products."

Other Analytical Products also follow many of the principles listed above for credit ratings, unless specifically noted as applicable solely to credit ratings.

3. GENERAL PRINCIPLES

3.1. The methodologies and procedures adopted by ARC Ratings seek to ensure that general principles as detailed in this section are observed in the Ratings' processes.

INTEGRITY, INDEPENDENCE AND OBJECTIVITY

3.2. The methodologies and procedures adopted by ARC Ratings aim to ensure the integrity, independence and objectivity of the process of assigning Ratings, as well as to identify, and therefore to eliminate, or manage and disclose, as appropriate, any actual or potential conflicts of interest, and also to ensure that the confidential information to which ARC Ratings and its employees have access is kept in confidence and is used exclusively for the purpose of assigning Ratings.

CONSISTENCY

3.3. The methodologies and the associated procedures used by ARC Ratings aim to ensure consistency of the Ratings assigned. Ratings are assigned by a Rating Panel according to methodologies and procedures set out in ARC Ratings' Manual of Organisation and Procedures.

QUALITY, RIGOUR AND ACCURACY

3.4 The knowledge and experience of ARC Ratings and its employees of the rating activity, the methodologies, and associated procedures, aims to ensure the quality, accuracy and rigour of the rating assignment process. This is further enhanced by ARC Ratings' commitment to maintaining these methodologies and procedures and to keeping them appropriately updated.

TRANSPARENCY AND TIMELINESS OF RATINGS DISCLOSURE

3.5 ARC Ratings' Ratings public disclosure is grounded on public and freely accessible documents. These documents are non-discriminatory and available without undue delay, thereby ensuring the transparency and timeliness of the Ratings' disclosure.

Furthermore, the Ratings assigned by ARC Ratings are subject to consistent monitoring and formal periodic review (unless the Ratings are assigned as point-in-time) to assure that they reflect all the relevant rating factors. All monitored Ratings are subject to at least annual review, with the rating panel option to determine a more frequent review or reviews as events warrant. As a result of monitoring, reviews may be brought forward to an earlier date. The methodologies and procedures used by ARC Ratings and its employees in the review processes are similar to those used for the assignment of the initial Rating, thus ensuring that Ratings in force remain consistent and accurate.

4. QUALITY AND INTEGRITY OF THE RATING PROCESS

A) QUALITY OF THE RATING PROCESS

4.1. ARC Ratings shall adopt, implement and enforce written procedures to (a) document reporting lines and allocate functions and responsibilities, and (b) ensure that the credit ratings prepared are based on thorough analysis of all information known to ARC Ratings that is relevant to its analysis according to its published rating methodologies. ARC Ratings has in place written methodologies for each class for which it issues Ratings, as well as a complete set of procedures for the Rating process. These methodologies and procedures are understood by everybody at ARC Ratings involved in the Rating process, the aim being to ensure that Ratings are assigned based on a thorough and consistent analysis of all information that is available to ARC Ratings and that is relevant to its analysis according to its rating methodologies. The methodologies are freely available on the ARC Ratings' website (www.arcratings.com).

The methodologies and procedures are reviewed at least annually, and in particular when material changes occur with an impact on the Rating processes, so as to identify and make any adjustments required to maintain their suitability.

ARC Ratings' methodologies are regularly being challenged, discussed and improved whenever necessary. This process of consistent improvement is promoted through:

- a corporate culture that promotes the discussion and the reception of constructive criticism;
- a team dedicated solely to the development and review of methodologies, separate from the analytical team that applies those methodologies; and
- the existence of an Internal Review Function, independent from all rating activities.

The development and review of Methodologies is carried out by the Methodology Department, and specifically the Head of Methodology. This is done with the approval of the Methodology Review and Approval Committee, with oversight provided by the Methodology Oversight Board. More information about the Methodology Department can be found in the Manual of Operations. ARC Ratings also has in place rating scales to be applied to all types of entities and/or instruments it rates, with clear definition of the meaning of each category and procedures defined to assure that those categories are applied consistently across all classes of rated entities and instruments available at no charge on www.arcratings.com in the report "Credit Ratings and Other Analytical Products".

ARC Ratings has strong internal control arrangements to ensure that the Rating process and their rating methodologies are not unduly influenced by the interests of different

market participants. The controls are intended to reflect all potential sources of influence including from arrangers, managers, and investors.

ARC Ratings has in place safeguards to ensure that changes to its methodologies are based on objective reasons. It has controls to prevent non-analytical information from potentially influencing methodology development for Ratings.

4.2. The rating methodologies and procedures used by ARC Ratings are rigorous, systematic, continuous, consistent and subject to validation, as referred in this Code of Conduct. Where possible, this will result in ratings that can be subject to objective validation based on historical experience, including back-testing.

4.3. ARC Ratings has in place procedures aimed at ensuring that its rating analysts use the correct methodology for the type of entity or obligation that is subject to the rating actions, as well as the procedures established in ARC Ratings' Manual of Organisation and Procedures.

4.4. Ratings assigned by ARC Ratings are decided by a Rating Panel. The Rating Panel assigns Ratings taking into account all the information believed to be relevant for the purpose, and the Ratings assigned are consistent with the methodologies and procedures adopted by ARC Ratings. All voting members of the Rating Panel must have sufficient knowledge and experience in assigning Ratings and have passed an analytical exam. ARC Ratings must ensure that the credit ratings it prepares are assigned by ARC Ratings and not by any individual.

ARC Ratings must take steps to avoid issuing any credit ratings that contain misrepresentations or are otherwise misleading as to the general creditworthiness of the rated entity or transaction.

4.5. ARC Ratings maintains internal records of its Ratings' activities. These records include:

- the proposals submitted for the assignment of each Rating;
- the financial compensation received from the entity, or related entity, whose commitments were rated, and from the users of Ratings (commercial information stored independently from analytical information) which are not divulged to the rating panel;
- the records documenting the established procedures and methodologies used by ARC Ratings to assign each Rating;
- confidential information such as the internal records and files, work papers, and draft reports for discussion, used as the basis for the assignment of each Rating;
- copies of the internal and external communications, including electronic communications, received and sent by ARC Ratings and its employees in connection to rating activities;

- for each rating decision taken, the composition of the Rating Panel, and the date on which the decision was taken.

These records allow the reconstruction of the Rating process for any Rating action, in case of need.

ARC Ratings maintains the above records for Ratings for at least seven years after the date when the Rating ceased to be valid (was withdrawn or assigned as a point-in-time). Records for any ARC Ratings entity that is registered or licenced in Hong Kong should be kept in writing in the English or Chinese language, or in such manner as to enable the records to be readily accessible and readily convertible into written form in the Chinese or English language.

Should the registration of any of ARC Ratings' subsidiaries, under its relevant regulatory context, be withdrawn, ARC Ratings undertakes to keep such records for an additional period of at least three years.

The detailed internal record policy is part of ARC Ratings' Manual of Organisation and Procedures, which is understood by all ARC Ratings' employees and to which they all must adhere. The assessment of the compliance by ARC Ratings' employees with this policy is a fundamental part of ARC Ratings' Compliance Department's mission.

4.6. ARC Ratings and its rating analysts are required to adhere to all relevant measures in accordance with the published methodologies, as well as procedures set out in ARC Ratings' Manual of Organisation and Procedures. ARC Ratings uses a wide range of information sources including, where relevant, holding meetings with the relevant members of the entity who is requesting the rating.

4.7. ARC Ratings uses all the resources it deems necessary to ensure the high quality of the Rating process. When assessing whether to send a contractual proposal for a Rating to an Applicant, ARC Ratings takes into account its capacity in terms of human, technical and material resources to carry out such assessments. If it considers that such capacity is insufficient to conduct the Rating process in accordance with the Code of Conduct and related methodologies and procedures, e.g. due to the complexity of the issuers or issues for which the assignment is proposed, or the lack of adequate analytical resources to complete it, ARC Ratings will decline the engagement.

ARC Ratings' Ratings reflect a thorough analysis of all information known and believed to be relevant for the analysis and assignment of the Rating. If, in the course of a credit rating, it becomes apparent that the information used is insufficient or is imprecise, ARC Ratings will not assign the credit rating. In the case of the assignment of a credit rating to financial commitments presenting limited historical data, ARC Ratings makes this fact clear in a prominent place in the credit rating supporting documentation.

ARC Ratings should assess whether existing methodologies and models for determining credit ratings of structured finance products are appropriate with the risk characteristics

of the assets underlying a structured finance product change materially. In cases where the complexity or structure of a new type of structured finance product or the lack of robust data about the assets underlying the structured finance product raise serious questions as to whether ARC Ratings can determine a credible credit rating for it, ARC Ratings should refrain from issuing a credit rating.

Changes in the quality of information available to conduct a review on a Rating assigned by ARC Ratings are disclosed in the rating supporting documentation and the assignment of the Rating takes into account the impact of such changes.

It is the responsibility of ARC Ratings' Risk Committee to ascertain the need to make changes and/or revisions to the procedures used, viewing, among others, their compliance with the legal framework applying to the rating activity, best management and organisation practices and procedures. The Risk Committee, which typically meets on a semi-annual basis for this purpose, or more frequently if required, is also responsible for approving any such changes.

Any changes or revisions to ARC Ratings' Manual of Organisation and Procedures shall be recommended by the Risk Committee to the Board of Directors for approval.

It is the responsibility of ARC Ratings' Methodology Department to ascertain the need to make changes and/or revisions to methodologies, models and key rating assumptions (this review is required to be performed at least annually for each methodology and model). These changes and/or revisions are submitted for approval to the Methodology Review and Approval Committee. For any ARC Ratings entity that is registered or licenced in Hong Kong, the findings of any such review should be comprehensively recorded in a written report, a copy of which should be provided to the SFC forthwith upon its completion. ARC Ratings should take appropriate measures to address any deficiencies which are identified during the course of such review.

ARC Ratings undertakes to disclose promptly, using the same means of communication as used for the initial disclosure, changes to methodologies, models, key rating assumptions and procedures used in rating activities, disclose the likely scope of ratings to be affected, and review the affected ratings as soon as possible and in line with the ARC Ratings' Manual of Organisation and Procedures.

B) REVIEWS

4.9. The Ratings assigned by ARC Ratings are valid until they are withdrawn (provided they are not point-in-time Ratings, for which the Rating is valid only at the moment of assignment). They are subject to consistent monitoring (unless the Ratings assigned are point-in-time). All monitored Ratings are subject at least to annual review, with the rating panel option to determine a more frequent review. As a result of monitoring, reviews may be brought forward to an earlier date. Except for ratings that clearly indicate they do not

entail ongoing surveillance, once a rating is published ARC Ratings monitors, on an ongoing basis, and updates the rating by:

(a) Reviewing, at least annually, the rating target's creditworthiness;

(b) Initiating a review of the status of the rating, which is consistent with the applicable rating methodology, upon becoming aware of any information that might reasonably be expected to result in the rating requiring revision or termination; and

(c) Updating the rating on a timely basis, as appropriate, based on the results of such review.

Subsequent monitoring should incorporate all cumulative experience obtained. Changes in methodologies, models or key assumptions used in preparing credit ratings should be applied where appropriate to both initial ratings and subsequent ratings. ARC Ratings should review affected credit ratings as soon as possible and not later than six months after the change, and should in the meantime place those ratings under observation.

The methodologies, models, key rating assumptions and procedures used by ARC Ratings in the review process are consistent with those used for the assignment of the initial Rating, thus ensuring that adequate resources, including human and financial resources, are used for the purpose, and that the Ratings in force are consistent and accurate.

When using separate teams for determining initial Ratings and for subsequent reviews, ARC Ratings undertakes to make sure that each team has the requisite level of expertise and resources to perform their respective functions in a timely manner.

Please note that ARC does not "discontinue" ratings. All assigned credit ratings that are monitored (i.e., not point in time) must be withdrawn based on the relevant policy contained in the Manual of Organisation and Procedures.

ARC Ratings does not provide credit ratings by subscription.

4.10. Information on the public Ratings issued by ARC Ratings is available through ARC Ratings' website (www.arcratings.com).

C) INTEGRITY OF THE RATING AND OTHER ANALYTICAL PRODUCTS PROCESSES AT ARC RATINGS

4.11. ARC Ratings and its employees are required to comply with all applicable laws and regulations governing the activity of rating agencies in each jurisdiction in which it operates.

4.12. ARC Ratings and its employees are required to interact at all times fairly and honestly with entities, obligors, originators, underwriters, arrangers, users of credit ratings, other market participants, and the public in general.

4.13. ARC Ratings holds its employees to the highest standards of integrity and ethical behaviour, and has policies and procedures in place that are designed to ensure that all its employees continue to act with the highest standards of integrity and ethical behaviour.

4.14. ARC Ratings and its employees are not permitted, either implicitly or explicitly, to give any assurance or guarantee to an entity subject to a rating action, obligor, originator, underwriters, arrangers, or users of ARC Ratings' Ratings about the outcome of a particular rating action. However, this does not preclude ARC Ratings from assigning Ratings to simulated financial commitments, namely in connection to structured products and project finance transactions.

4.15. ARC Ratings and its employees are not permitted to make promises or threats about potential rating actions to influence rated entities, obligors, originators, underwriters, arrangers, or users of the ARC Ratings' Ratings to pay for Ratings or other services.

4.16. Neither ARC Ratings, nor its employees can make proposals or recommendations, either formally or informally, regarding the structuring or activities of rated entities or obligors that could impact a Rating of the rated entity or obligation, including but not limited to proposals or recommendations about corporate or legal structure, assets and liabilities, business operations, investment plans, lines of financing, business combinations, and the design of structured finance products.

4.17. ARC Ratings has established a Compliance Department with a global coordination that is responsible for ensuring compliance of all ARC Ratings' subsidiaries and of its employees with ARC Ratings' Code of Conduct as well as with applicable laws, rules regulations, codes or other requirements which apply to ARC Ratings in the specific jurisdictions in which those entities operate. The Compliance Department reporting line is independent of the rating operations.

4.18. ARC Ratings has an Internal Ratings Auditor, independent of the Ratings Department, working alongside the Compliance Department, but focused on the technical Ratings aspects.

4.19. If an employee of ARC Ratings or any natural person or entity that provides services to ARC Ratings becomes aware that another employee of ARC Ratings or natural person or entity that provides services to ARC Ratings has engaged in conduct that is illegal, unethical, contrary to regulatory expectations, or contrary to this Code of Conduct, that person or entity shall report such information promptly to the Compliance Department of ARC Ratings. The Compliance Department shall take appropriate action in accordance with the legal framework and the procedures adopted by ARC Ratings. ARC Ratings' representatives and employees are not necessarily expected to be experts in the law. Nonetheless, they are expected to report such activities as a reasonable person in their position would question or be concerned over. ARC Ratings should ensure that its Compliance Department, who receives such a report from a representative or employee,

is obligated to take appropriate action, including such action as is required by any law, rules, regulations, codes or other requirements which apply to ARC Ratings and are issued, administered or enforced by any relevant regulatory authority or agency, and by ARC Ratings' own rules, guidelines or codes. ARC Ratings should not retaliate, and should prohibit retaliation by its other representatives or employees, against any representative or employee who, in good faith, makes such a report.

The Board of Directors of ARC Ratings shall ensure that there shall be no form of retaliation against the ARC Ratings' employee or natural person or entity that provides services to ARC Ratings which reported the situations referred to in the preceding paragraph.

5. ARC RATINGS INDEPENDENCE AND AVOIDANCE OF CONFLICTS OF INTEREST

A) GENERAL

5.1. The assignment or review of Ratings by ARC Ratings is not permitted to be conditional on the potential impacts (economic, political, or otherwise) of the rating actions on ARC Ratings, the rated entity, obligor, originator, underwriter, arranger, investor or other market participants.

5.2. ARC Ratings and its employees are required to use care and professional judgment to maintain both the substance and appearance of ARC Ratings' and its employees' independence and objectivity.

5.3. The assignment or review of a Rating by ARC Ratings is only permitted to be influenced by factors relevant to assessing the creditworthiness of the entity or obligation.

5.4. The Ratings assigned by ARC Ratings to an entity or financial obligation are not permitted to be affected by any existing or potential conflict of interest or business relationship of ARC Ratings, its employees, or any natural person or entity that provides services to ARC Ratings, or any person directly or indirectly linked to it by control, namely by any existing or potential business relationship between ARC Ratings and the rated entity, obligor, originator, underwriter, or arranger (or any of their affiliates), or any other party.

5.5. ARC Ratings is not permitted to issue a Rating in any of the following circumstances, or shall, in the case of an existing rating, promptly disclose where the credit rating is potentially affected by the following:

- ARC Ratings or any ARC Ratings' employees, or any other natural person whose services are placed at the disposal or under the control of ARC Ratings and who are directly involved in the issuing of Ratings, directly or indirectly owns financial instruments of the rated entity or a related third party or has any other direct or indirect ownership interest in that entity or party, other than holdings in diversified collective investment schemes, including managed funds such as pension funds or life insurance;
- a shareholder or member of ARC Ratings holding 10% or more of either the capital or the voting rights of ARC Ratings or being otherwise in a position to exercise significant influence on the business activities of ARC Ratings, holds 10% or more of either the capital or the voting rights of the rated entity or of a related third party, or of any other ownership interest in that rated entity or third party, excluding holdings in diversified collective investment schemes and managed funds such as pension funds or life insurance, which do not put that person in a position to exercise significant influence on the business activities of the scheme;

- the Rating is issued with respect to a rated entity or a related third party directly or indirectly linked to ARC Ratings by control;
- the Rating is issued with respect to a rated entity or a related third party which holds 10% or more of either the capital or the voting rights of ARC Ratings;
- an ARC Ratings' rating analyst, employee, or any other natural person whose services are placed at the disposal or under the control of ARC Ratings and who is directly involved in the issuing of Ratings, is a member of the administrative or supervisory board of the rated entity or a related third party;
- a shareholder or member of ARC Ratings holding 10% or more of either the capital or the voting rights of ARC Ratings or being otherwise in a position to exercise significant influence on the business activities of ARC Ratings, is a member of the administrative or supervisory board of the rated entity or a related third party;
- a rating analyst who participated in determining a Rating, or a person who approved a rating, has had a relationship with the rated entity or a related third party which may cause a conflict of interest.

5.6. Should it engage in activities other than the assignment of Ratings, ARC Ratings shall not provide financial consultancy or advisory services to the rated entity or a related third party regarding the corporate or legal structure, assets, liabilities or activities of that rated entity or related third party. In the case of activities that may give rise to conflicts of interest with rating activities, ARC Ratings shall separate its rating activities from any other activities or to adopt procedures and mechanisms to eliminate any potential conflicts of interest.

Should it develop other activities for rated entities or related third parties, ARC Ratings shall disclose such activities in the rating supporting documentation.

In addition, ARC Ratings shall publish on its website (www.arcratings.com) a list of the ancillary activities developed, with justification of their ancillary nature.

ARC Ratings should not enter into any contingent fee arrangement for providing credit rating services. Contingent fees are fees calculated on a predetermined basis relating to the outcome of a transaction or the result of the level of rating performed by ARC Ratings. For the purposes of this paragraph, a fee is not regarded as being contingent if established by a court or other public authority.

B) ARC RATINGS POLICIES, PROCEDURES, CONTROLS AND DISCLOSURES

5.7. ARC Ratings has in place internal procedures and mechanisms to prevent, identify, and consequently eliminate or manage and disclose, clearly and prominently, as appropriate, any actual or potential conflicts of interest involving its employees, any natural person or entity that provides services to ARC Ratings or any person directly or

indirectly linked to it by control, that may influence (a) the ratings ARC Ratings makes, or (b) the judgment and analyses of the representatives who are involved in the preparation of ratings. ARC Ratings will disclose such conflict avoidance and management measures.

ARC Ratings maintains a record of all significant threats to the independence of its activity.

ARC Ratings has implemented measures and procedures, in particular internal control mechanisms, reporting arrangements and measures ensuring the independence of its employees, of any natural person or entity that provides services to ARC Ratings and of any person directly or indirectly linked to it by control.

5.8. ARC Ratings discloses to relevant stakeholders specific situations of actual and potential conflicts of interest in its rating supporting documentation, in a complete, timely, clear, concise, specific and prominent manner.

ARC Ratings should also make full public disclosure of its ancillary services and update such disclosure in a timely manner.

5.9. ARC Ratings discloses in its Transparency Report the proportion of revenues received from rating clients services, as well as the name of the entities with published Ratings that represent more than 5% of its annual revenue.

ARC Ratings should publicly disclose the general nature of its compensation arrangements with rated entities, including: (a) where ARC Ratings or any affiliate that is a credit rating agency, receives from a rated entity compensation unrelated to its ratings service, ARC Ratings should disclose the proportion that all such compensation constitutes against the total fees that ARC Ratings, or its affiliate, receives from such rated entity for the provision of ratings services.

5.10. ARC Ratings should encourage issuers and originators of structured finance products to publicly disclose all relevant information regarding these products so that investors and other credit rating agencies can conduct their own analyses independently of ARC Ratings contracted. When assigning credit ratings to structured finance products, ARC Ratings undertakes to disclose in the credit rating announcement whether the issuer of such products has informed that it is publicly disclosing all relevant information about the obligation being rated or if the information remains non-public.5.11. ARC Ratings publishes the applicable rating disclosures as required by each jurisdiction in its credit ratings press releases and/or rating reports and/or on the ARC Ratings' website.

5.12. ARC Ratings and its employees are not permitted to engage in any financial instruments trading presenting conflicts of interest with its rating activities. This restriction is specified in the employment contracts entered into by ARC Ratings and each of its employees.

5.13. In instances where the entities whose financial commitments are rated by ARC Ratings have regulatory or oversight powers over ARC Ratings' activities, the

employees engaged in the Rating processes of the financial commitments of said entities are required to be different from those dealing in the regulatory and oversight issues with those entities.

C) INDEPENDENCE OF ARC RATINGS' RATING ANALYSTS AND OTHER EMPLOYEES

5.14. ARC Ratings' organisational structure clearly identifies hierarchical relationships and allocates functions and responsibilities. These reporting lines are structured to eliminate, or effectively manage, actual or potential conflicts of interest.

ARC Ratings' analysts' compensation is not based on any revenue measures in relation to the Ratings on which they work.

It is the responsibility of the Board of Directors of ARC Ratings to establish and periodically review the compensation policies and practices for ARC Ratings' employees, and to ensure that the policies, procedures and practices have not compromised the objectivity of the Rating processes.

5.15. ARC Ratings has defined and adopted the Segregation of Commercial and Analytical Activities Policy, according to which employees directly involved in a Rating are not authorised to initiate, or participate in, discussions regarding fees or payments with rated entities, obligors, arrangers or subscribers or related third party, or with any person directly or indirectly linked to these by control.

The Segregation of Commercial and Analytical Activities Policy provides guidelines of how both Commercial and Analytical teams should interact with market participants, advising staff of what is and is not acceptable.

Key points from the Segregation of Commercial and Analytical Activities Policy include:

- All discussions with issuers and intermediaries regarding commercial information are required to be managed by Commercial Department employees without the involvement of Rating Analyst employees. This includes meetings, discussions, email or other communications (whether internal or external) regarding client-specific pricing, contracts, invoices, fees or sales data for any product(s) or service(s) offered by ARC Ratings.

- Commercial and Analytical teams are fully aware of the requirement for analysts to recuse themselves from meetings if fees are going to be discussed.

- A member of the Commercial team will advise the client at the beginning of any meeting when an analyst is present that they must not discuss fees.

5.16. ARC Ratings' employees must report the following situations to the Compliance Department and cannot participate in or otherwise influence a rating action with respect to an entity or obligation if the employee, an immediate family member of the employee (e.g., spouse or partner considered by national law as equivalent to the spouse, children

dependent on them as defined under national law, or other relatives who have lived with them under the same roof for at least one year), or an entity managed by the employee (e.g., a trust):

- holds or transacts financial instruments issued by the rated entity or derivatives based on such instruments, other than holdings in diversified collective investment schemes;
- holds or transacts financial instruments issued by any entity related to a rated entity, or derivatives based on such instruments, other than holdings in diversified collective investment schemes, the ownership of which may cause or be generally perceived as causing a conflict of interest;
- holds or transacts in a trading instrument issued by a lead underwriter or arranger of the rated obligation, the ownership of which may cause or may be perceived as causing a conflict of interest with respect to the employee or ARC Ratings;
- is currently employed by or had a recent employment or other business relationship with the rated entity or obligor or a lead underwriter or arranger of the rated obligation that may cause or be generally perceived as causing a conflict of interest;
- is a director of the rated entity or obligor, or lead underwriter or arranger of the rated obligation;
- has solicited money or favours from the rated entity or any other related entity (it is strictly forbidden for any ARC Ratings employee to solicit money or favours from anyone);
- has accepted gifts offered in the form of cash or any gifts with a significant monetary value from the rated entity (it is strictly forbidden to have such behaviour);
- has family and kin in direct line of the 1st degree, other relatives or kin in direct line or collateral line up to the 2nd degree who have an employment relationship with the rated entity; or
- has applied for a job with a rated entity, or a financial firm with which they have had significant dealings as part of their duties at ARC Ratings, received a job offer to work in one of these entities or joined one of these entities.

Please note that all clauses above which relate to rated entities also apply to cases where the entity is undergoing a Rating process but has not yet received a Rating.

The "Declarations of Interest" form received from employees annually (and updated whenever necessary) documents any conflicts of interest and will be held on file by the Compliance Department. In addition, employees are required to recuse themselves from any rating panel if they foresee an actual or potential conflict of interest.

5.17 An ARC Ratings' analyst or their immediate family member (e.g., spouse or partner considered by national law as equivalent to the spouse, children dependent on them as defined under national law, or other relatives who have lived with them under the same roof for at least one year) cannot hold or transact in a trading instrument issued by a rated entity or obligor in the analyst's area of primary analytical responsibility. This would not preclude an analyst from holding or trading a diversified collective investment scheme that owns a trading instrument issued by a rated entity or obligor in the analyst's area of primary analytical responsibility irrespective of whether the analyst was involved in the ratings process.

5.18. An ARC Ratings employee who becomes involved in a personal relationship (including, for example, a personal relationship with an employee of a rated or credit assessed entity, obligor, or originator, or the lead underwriter or arranger of a rated or credit assessed obligation) that creates an actual or potential conflict of interest is required to disclose the relationship to the Compliance Department.

5.19. ARC Ratings has established and implemented policies and procedures for reviewing the work of the past two years of rating analysts and those who supervised the work of rating analysts that leave the employ of ARC Ratings and who within one year join an entity that the employee participated in rating, an obligor whose obligation the employee participated in rating, an originator, underwriter, or arranger with which the employee had significant dealings as part of his or her duties at ARC Ratings, or any of their affiliates. Such review shall determine whether any conflicts of interest of the employee influenced the Rating and take action to revise the rating if appropriate in accordance with the relevant regulations and ARC Ratings' policies and procedures. Such review will be conducted by the Compliance department. If the Compliance department finds evidence of a conflict of interest regarding the rating actions of the former employee, this information will be communicated to the CEO detailing the actions. The CEO will determine the severity of the actions and any further steps necessary to resolve the conflict of interest.

ARC Ratings' analysts, employees or any other natural person that provide services to ARC Ratings, or the spouse or partner considered by national law as equivalent to the spouse or other family members living under the same roof with them for at least one year, shall not take up a key management position with the entity whose financial commitments were rated or with related third parties within six months of the issuing of a Rating.

6. ARC RATINGS RESPONSIBILITY TO INVESTORS AND TO THE ENTITIES WHOSE FINANCIAL COMMITMENTS ARE BEING RATED

A) TRANSPARENCY AND TIMELINESS OF ARC RATINGS, RATINGS DISCLOSURE

6.1. ARC Ratings shall disclose any public Rating as well as any decision to withdraw a Rating (including full reasons for this decision), on a non-selective basis and in a timely manner, through ARC Ratings' website (www.arcratings.com).

6.2. The press releases that substantiate the Rating decisions and outlooks are freely available for download from the ARC Ratings' website (www.arcratings.com). Public disclosures about ratings such as press releases and any associated public documentation must comply with the relevant regulations of the jurisdiction in which the ARC Ratings' entity that is publishing them is located.

6.3. ARC Ratings shares the draft press release with a rated entity before publication to allow entities to clarify or correct factual inaccuracies in the information on which the Rating will be based and to indicate if the draft documents contain any information which the applicant considers its own confidential information.

6.4. ARC Ratings in assigning all its Ratings notes the following:

- that the expression "ARC Ratings" is a trade name/brand used by ARC Ratings' subsidiaries that assign Ratings and a general expression to identify these subsidiaries;
- that all of ARC Ratings' subsidiaries follow the same procedures and apply the same methodologies;
- that ARC Ratings provides to the entity which is being rated or whose financial commitments are being rated, the documents that substantiate the Rating to be attributed thus affording that entity the opportunity to clarify or correct factual details;
- the limitation of the use of the Rating by investors, stating that Ratings do not constitute a recommendation or offer or solicitation to buy or sell any investments that may be mentioned, and are only one of the factors that investors may wish to consider;
- that Ratings are assigned based on information, which may include confidential information, collected from a wide variety of sources which ARC Ratings believes to be reliable including from the entity being rated or whose financial commitments are being rated;
- that ARC Ratings has adopted and implements measures aiming to ensure that, to the extent available in the circumstances, it has obtained reasonable verification of the information it uses in assigning a rating and that such information is from reliable sources;

- that, notwithstanding the foregoing, if ARC Ratings is not satisfied with the quality of the information it receives it will decline to assign the Rating;
- where relevant, the fact that historical data on the entity being rated or whose commitments are being rated is limited;
- in the case of credit ratings in the European Union or United Kingdom, a reference to the historical default rates published by ESMA in a central repository, together with an explanatory statement of the meaning of those default rates ("ARC Ratings, S.A. historical default rates are published in the European Securities and Markets Authority Central Repository (CEREP) which can be accessed on the website cerep.esma.europa.eu/cerep-web/. It should be highlighted that ARC Ratings' rating portfolio can be characterised as a "very low default portfolio" and therefore the agency's historical defaults are not statistically significant.
- where an existing credit rating is potentially affected by either of the following:
    - a shareholder (direct or indirect, provided that this information is known or should be known by ARC Ratings) or member of ARC Ratings holding 5% or more of either the capital or the voting rights of ARC Ratings or being otherwise in a position to exercise significant influence on the business activities of ARC Ratings, holds 5% or more of either the capital or the voting rights of the rated entity or of a related third party, or of any other ownership interest in that rated entity or third party, except for holdings in diversified collective investment schemes and managed funds such as pension funds or life insurance, which do not put that person in a position to exercise significant influence on the business activities of the scheme; and
    - a shareholder or member of ARC Ratings holding 5% or more of either the capital or the voting rights of ARC Ratings or being otherwise in a position to exercise significant influence on the business activities of ARC Ratings, is a member of the administrative or supervisory board of the rated entity or a related third party.

The description of the rating assignment process by ARC Ratings is part of the ARC Ratings' Code of Conduct and is further highlighted in ARC Ratings' Manual of Organisation and Procedures.

ARC Ratings undertakes not to use the name of any competent authority in such a way that would indicate or suggest endorsement or approval by that authority of the credit ratings assigned.

6.5. When disclosing the assignment or revision of a public rating, ARC Ratings issues a press release substantiating that assignment or revision.

6.6. In the case of a Public Rating request by an Issuer, ARC Ratings will disclose an initial rating in accordance the terms established in the agreement signed by the applicant and always in line with any regulatory requirements. This includes the possibility that the

applicant has the option, prior to ARC disclosing the rating, to decide to request that ARC not disclose its ratings, except in cases provided for by regulations, by law or in the case of unsolicited ratings. All disclosures will be based on the content submitted by ARC Ratings, incorporating any eventual corrections suggested by the rated entity and always respecting regulatory requirement."

For Surveillance "Monitored ratings assigned by ARC Ratings are valid until they are withdrawn (WD) or the financial commitments paid in full (PIF). As for the review processes, following Regulation 1060/2009 and Statutory Instrument Nº 266/2019 requirements, for public ratings, ARC Ratings will publish every subsequent rating action after the first rating becomes public and for as long as the rating is outstanding.

The disclosure consent, which applies to initial ratings and to rating reviews, includes the disclosure of the Press Release and/or Rating Report by ARC Ratings through ARC Ratings' website (www.arcratings.com) and can be complemented by other means of disclosure, such as:

- public media;

- email sent to all the entities registered in ARC Ratings' mailing list;

- databases created by the Regulatory Authorities.

If the initial rating was a private rating, ARC will communicate to the applicant every subsequent rating action after the first rating for as long as the rating is outstanding.

If, subsequently, the client/issuer distributed or authorised the distribution of the rating or rating report on a public platform, ARC Ratings will then evaluate whether to withdraw the private rating, publish the rating and/or publish and immediately withdraw the rating.

ARC Ratings undertakes to immediately disclose, by the same means as the initial disclosure, any changes to the methodologies, models, key assumptions and procedures used in the process of assigning Credit Ratings and what ratings may be affected by these changes, as well as to review them as soon as possible (at most within six months after making these changes), placing them "Under Methodology Observation", as referenced in the Methodology section.

6.7. Given the limited size of ARC Ratings, it has not been possible to make an objective validation of the Ratings assigned by ARC Ratings, as would be desirable and is foreseen in the Code of Conduct Fundamentals for Credit Rating Agencies issued by IOSCO.

6.8 ARC Ratings believes that when such validation becomes possible, i.e., when there is a meaningful statistical sample, it will not differ significantly from that presented by other international Credit Rating Agencies in other geographical markets. In the meantime, and where possible, ARC Ratings verifies the accuracy of the credit ratings assigned by comparing them with those assigned by other Credit Rating Agencies to the financial commitments of the same entities in roughly the same historical moments, and by

verifying the consistency over time of the credit ratings assigned by ARC Ratings with the spreads on the debt contracted by the entity whose financial commitments are rated.

When such validation is possible, ARC Ratings will disclose the historical default rates of the financial commitments which it has rated, quantified and organised, and, where possible, standardised in such a way to assist investors in drawing performance comparisons between different Credit Rating Agencies.

6.9. ARC Ratings can assign both solicited and unsolicited Ratings. In the case of solicited Ratings, the entity which solicited the rating participates in the Rating process through, among other things, the provision of information required for the process, part of which is reserved and confidential, as well as meetings with officers of the entity being rated or whose financial commitments are being rated. In the case of unsolicited public Ratings, these will be clearly identified as such, and ARC Ratings will establish and disclose the methodologies and procedures used for the purpose, also disclosing if the entity being rated or whose commitments were rated or a related entity participated in the Rating process and whether ARC Ratings had access to internal information from those entities.

6.10. Any material modifications to the methodologies, practices and procedures used by ARC Ratings are publicly disclosed through its primary website (www.arcratings.com) and are put for public consultation prior to their application.

B) THE TREATMENT OF CONFIDENTIAL INFORMATION AND MATERIAL NON-PUBLIC INFORMATION BY ARC RATINGS

6.11. ARC Ratings has implemented procedures to protect the confidential nature of information received from a rated entity, obligor, or originator, or the underwriter or arranger of a rated or credit assessed obligation.

ARC Ratings takes all reasonable measures to protect all property and records belonging to it, or in its possession, from fraud, theft or misuse.

ARC Ratings defines Confidential Information as information it receives from clients, customers, a rated entity, obligor, or originator, or the underwriter or arranger of a rated obligation which ARC Ratings knows, or should reasonably be considered to know, is information confidential to that other entity. Confidential Information also includes information which has been created or generated by ARC Ratings to which confidentiality applies.

Confidential Information does not include the following:

- Information which was or is in the public domain
- Information which was lawfully received from a third party without the obligation of confidence

- Information which is required to be disclosed pursuant to a request from a regulator, court, judicial body, recognised exchange, or government body
- Information which is required to be disclosed by law or regulation
- Information which was previously known to ARC Ratings via independent sources

ARC Ratings defines Material Non-Public Information (MNPI) as a specific type of Confidential Information which directly or indirectly relates to one or more issuers, or to one or more financial instruments and:

- If it were made public would be likely to have a significant effect on the price of those financial instruments, or the price of related derivative financial instruments; or
- There is a significant likelihood that a reasonable investor would consider such information relevant and important if making an investment decision.

6.12. ARC Ratings has implemented procedures to ensure that its employees (and natural persons and entities that provide services to it) have executed appropriate agreements containing binding confidentiality obligations:

- take all reasonable measures to ensure that the Confidential Information and/or MNPI received from a rated entity, obligor, or originator, or the underwriter or arranger of a rated obligation and the information related to Rating processes is adequately kept and cannot be used in a fraudulent or undue manner, taking into account the nature, scale and complexity of ARC Ratings' business and the nature and range of its rating activities;
- are prohibited from engaging in transactions in financial instruments or financial instrument derivatives when they possess Confidential Information and/or MNPI concerning the issuer of the financial instruments or the underlying assets of the financial instrument derivatives;
- are familiar with the procedures and commitments undertaken by ARC Ratings regarding the preservation of the Confidential Information and/or MNPI received, and are obliged to periodically report to the Compliance Department of ARC Ratings that they comply with those procedures and commitments;
- do not disclose any information about Ratings or any future changes to those Ratings except to the entities being rated or whose financial commitments are being credit rated or credit assessed, obligor, arranger, or their designated agents prior to any public assignment of Ratings;
- do not share Confidential Information and/or MNPI held by ARC Ratings with employees of companies with which ARC Ratings is under a group relationship and only share information among each other strictly as required to assign Ratings;

- do not use or share Confidential Information and/or MNPI for the purpose of trading financial instruments, or for any other purpose except the conduct of the Rating.

7. GOVERNANCE, RISK MANAGEMENT AND EMPLOYEE TRAINING

7.1. The ARC Ratings Boards of Directors is responsible for the approval of the ARC Ratings' Code of Conduct. This Code of Conduct is available free of charge on the ARC Ratings' website (www.arcratings.com).

7.2. ARC Ratings' Compliance Department is responsible for reviewing the adherence and reporting any exceptions to the ARC Ratings' Code of Conduct to the ARC Ratings' Risk Committee. The ARC Ratings' Risk Committee is responsible for risk management, identifying, assessing, monitoring, and reporting the risks arising from its activities, and reviewing the ARC Ratings' Code of Conduct. Following review of the ARC Ratings' Code of Conduct the Risk Committee may recommend changes of this document to the ARC Ratings' Boards of Directors.

7.3. ARC Ratings Compliance Department will deliver periodic training on the Code of Conduct and regulatory requirements to all ARC Ratings' employees. This training should be performed at least once in a calendar year. ARC will also promote training to bridge skills gaps or increase skills of specific staff members when these are identified.

8. DISCLOSURE, COMPLAINTS AND COMMUNICATION WITH MARKET PARTICIPANTS

8.1. This Code of Conduct is publicly disclosed, free of charge on the ARC Ratings' website (www.arcratings.com).

All Ratings methodologies adopted by ARC Ratings, as well as a brief description of the models and key rating assumptions used for each rating analysis, and material changes to the same, are also available on ARC Ratings' website.

8.2. Complaints regarding any ARC Ratings' activity can be sent to compliance@arcratings.com.The Compliance Department will review the complaint and report directly to the ARC Ratings' Board of Directors.

9. WHILSTLEBLOWING

9.1. Whistleblowing forms part of the Compliance Department functions. The Compliance Department has an important responsibility to receive and investigate reports of illegal conduct from staff members or other individuals associated with ARC Ratings, as well as to protect the anonymity of the individual making the report if that individual chooses to remain anonymous.

Employees can raise genuine concerns about possible malpractices without fear of reprisal. Malpractice includes serious breaches of ARC Ratings' own internal policies and procedures, other unethical conduct, criminal offences or breaches of law or regulation, endangerment of the health and safety of any person, questionable accounting and auditing matters and the deliberate concealment of any malpractice.

9.2 Appropriate steps are required to be taken to ensure the whistleblower's anonymity as much as possible. The whistleblowing communication can be made through various discrete channels, including email, telephone, or in person.

9.3 Whistleblowing communications may be reported to the Compliance Department in writing to compliance@arcratings.com, or orally by contacting a member of the Compliance Department. If the communication is provided orally, the Compliance Department shall then summarise the oral communication and record it in writing. Following receipt of a whistleblowing communication, the Compliance Department shall initiate an investigation and may request cooperation from other departments or specific resources from the Board of Directors to pursue the investigation process. The findings of the investigation shall be reported to the Board of Directors, who shall then decide on appropriate measures to take. If the whistleblowing complaint relates to a member or members of the Board, those individuals will not be included in any Board discussions.

9.4 To ensure the safety of the person making the report, the Compliance Department must maintain strict confidentiality about the identity of the whistleblower, even with the Board of Directors and other senior management. This is to ensure that the person making the report has their anonymity protected as much as possible. Furthermore, it facilitates a safe and encouraging environment for any future whistleblowers.

9.5 If the person making the report does not report such incident to the Compliance Department but to the CEO, Deputy CEO, a member of the Board of Directors or their manager, the individual reviewing the report must disclose this to the Compliance Department unless the whistleblowing communication relates to a member or members of the Compliance Department. In this instance, the report should be made directly to the Board of Directors. In addition, if the whistleblower does not feel comfortable making a whistleblowing report to one of these individuals, then they can make a whistleblowing report to an ARC Ratings' regulator. Information on how to contact an ARC Ratings' regulator is found on the Regulators' websites.

9.6 Whistleblowing training will be provided annually to all staff. This will include the whistleblowing contact details of the Regulators and information will be stored on the ARC Ratings' Intranet.

10. GIFTS, ENTERTAINMENT, AND HOSPITALITY

10.1 Being offered, or receiving gifts, entertainment and hospitality may have the potential to influence Ratings decisions. Therefore, ARC Ratings has restrictions on the types and value of gifts, entertainment, and hospitality that ARC Ratings' employees can receive as the result of employment with ARC Ratings.

10.2 It is strictly forbidden for staff to receive the following from any rated entity or any other related entity:

- cash or cash equivalents (e.g. vouchers);
- anything with a significant monetary value which exceeds local business or social customs;
- anything which is intended to be concealed or is not offered in an open or transparent manner;
- anything from a public official or body;
- anything which is offered and to which an expectation of the provision of a service or provision of something of value in return is attached (for example, an expectation of quid pro quo).

10.3 If staff receive an inappropriate offer, it must be declined immediately, and the matter reported to the Compliance Department as soon as possible.

10.4 It is forbidden for staff to solicit or encourage the offering of a gift, entertainment, or hospitality from any business contact.

10.5 All staff may offer and accept non-cash business items of token or limited value (e.g. corporate-branded pens, mugs, notebooks, bags, etc.). A light lunch (under Euro 25 or equivalent value) may also be offered or accepted if it is part of a meeting or conference.

10.6 Non-analytical staff may receive from a rated entity or any other related entity, gifts, entertainment, and hospitality that includes reasonable and customary business meals and entertainment where there is a legitimate business need or purpose. If at any time the client or potential client suggests that it expects a particular rating outcome as a result of the gift, entertainment or hospitality, this must immediately be declined and reported to the Compliance Department as soon as possible.

10.7 It is forbidden for staff to offer any gift, entertainment, or hospitality to any of ARC Ratings' regulators, other than the reasonable provision of de minimis food and refreshments that are provided as a result of attending meetings with the regulator(s).

10.9 The offering or accepting of bribes by employees is strictly forbidden. Employees are strictly forbidden from engaging in any commercial or public sector bribery. There are

various anti-bribery and corruption laws in place in the jurisdictions in which ARC Ratings operates or intends to operate. These include the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act.

10.10 The UK Bribery Act 2010 prohibits "facilitation payments". These are small payments made to a public official to facilitate or expedite a routine government process. As such, facilitation payments are generally prohibited by this policy. However, where failure to make such payments would result, or is likely to result, in an employee or related person being placed in a situation which results in potential safety or wellbeing issues, personal harm, or an employee being placed under duress, such payments are permissible. Such payments must only be made in exceptional circumstances and are required to be reported to the Compliance Department as soon as possible.

10.11 Payments must not be made by third parties that if they were made by ARC Ratings itself would constitute a breach of this policy.

10.12 Where employees are aware of any breaches of this policy, they must report this to Compliance as soon as possible.

11. LICENSING REQUIREMENTS

This section applies only to employees employed by an ARC Ratings' entity which is licensed in Hong Kong.

11.1 An employee is required to become a licensed representative if they are carrying on a regulated activity. An individual's licence may be subsequently transferred to another licensed corporation. If a licensed representative ceases to act for or on behalf ARC Ratings then both ARC Ratings and the representative must notify the SFC within seven business days after the cessation. The representative must return the licence to the SFC within the same time period. If the representative has not applied to the SFC for transfer of their accreditation to another licensed corporation within 180 days after the cessation of their license, it is deemed to have been revoked.

11.2 Any employee of ARC Ratings who actively participates in or supervises a regulated activity should obtain a licence with the SFC and be approved by the SFC as a responsible officer. ARC Ratings must have at least two responsible officers for each regulated activity for which it holds a licence and one of those must be an executive director who actively participates in or is responsible for supervising that regulated activity. Executive directors of a licenced corporation must be Responsible Officers. At least one responsible officer must be available at all times and based in Hong Kong.

DISCLAIMERS

ARC Ratings only provides a rating of the rated securities or of the issuer and neither recommends nor will recommend how an issuer can or should achieve a particular rating outcome. A rating does not cover a potential change in laws and is not and cannot be regarded as an audit. Moreover, ARC Ratings is not a party to any transaction documents of the instrument/transaction it is rating. Users of our ratings should familiarise themselves with the transaction documents. ARC Ratings does not act as a legal, tax, financial, investment or other advisor and users should seek professional advice from appropriate third parties where necessary.

ARC Ratings, S.A. is registered as a Credit Rating Agency with the European Securities and Markets Authority (ESMA), within the scope of the Regulation (EC) Nº 1060/2009 of the European Parliament and of the Council, of 16 September, and recognised as External Credit Assessment Institution (ECAI). ARC Ratings (UK) Limited is registered as a Credit Rating Agency with the United Kingdom Financial Conduct Authority, within the scope of the Statutory Instrument Nº 266/2019, of 13 February, and recognised as ECAI. ARC Ratings (Asia Pacific) Limited, has been granted a Type 10 license (Providing Credit Rating Services) by the Securities and Futures Commission ("SFC") of Hong Kong, effective 11 March 2026.

Credit Ratings assigned by ARC Ratings are independent and forward-looking opinions of the relative credit risks of financial obligations issued by various entities. The credit risk is the risk that an entity may not meet its financial obligations as they come due i.e. the capacity and willingness of an entity/issuer to make all required interest and principal payments on a given obligation in a timely manner in accordance with its terms. Credit ratings express risk in relative rank order they are an ordinal measure of credit risk whose probability of default or loss may vary through the credit cycle. They are issued using an established and defined ranking system of rating categories (rating scale). ARC's credit ratings are determined using ARC's published rating methodologies.

Rating(s) assigned by ARC Ratings was/were solicited by the entity whose financial commitments are being rated. ARC Ratings provides to the entity whose financial commitments are being rated the documents that substantiate the rating to be attributed. This entity is thus given the opportunity to clarify or correct factual details. ARC Ratings also grants the issuer the possibility of appealing a rating accorded by ARC as long as this appeal is supported on additional information that hasn't been taken into account in the original rating accordance. For additional information on ARC Ratings and historical default rate performance, please see "Credit Ratings and Other Analytical Products - Definitions and Scales" available on www.arcratings.com.

ARC Ratings, S.A. historical default rates are also published in the European Securities and Markets Authority Central Repository (CEREP) which can be accessed on the website cerep.esma.europa.eu/cerep-web/. It should be highlighted that ARC Ratings' rating portfolio can be characterized as a "very low default portfolio" and therefore the agency's historical defaults are not statistically significant. Default is the lack of full and timely payment of capital or interest or of the occurrence of any event that explicitly indicates that the future full and timely payment of those commitments will not occur (e.g., in case of insolvency).

Ratings do not constitute a recommendation or offer or solicitation to buy or sell any investments that may be mentioned, and are only one of the factors that investors may wish to consider. The use of any rating is entirely at the user's own risk. Throughout the entire period during which ratings are valid, ARC Ratings monitors the issuer's performance via public sources and information provided by the issuer/sponsor and, if a material development occurs, ARC Ratings may bring forward the date of the review unless stated to be a point in time rating. The updated list of public ratings is available on the website www.arcratings.com. In the rating process, ARC Ratings adopts procedures and methodologies aimed at ensuring transparency, credibility and independence, and also that rating classifications are not influenced by conflicts of interest.