

September 2015, Frankfurt am Main.

DISCLOSURE AND PRESENTATION OF CREDIT RATINGS – POLICY

Disclosure and presentation of credit ratings in Rating-Agentur Expert RA GmbH:

1. Rating-Agentur Expert RA GmbH shall disclose any public credit rating for which the rating object has signed the disclosure agreement or didn't sign the non-disclosure agreement, as well as any decision to discontinue a public credit rating, on a non-selective basis and in a timely manner. In the event of a decision to discontinue a credit rating, the information disclosed shall include full reasons for the decision.
2. Rating-Agentur Expert RA GmbH is planning to assign unsolicited credit ratings only to countries (unsolicited sovereign ratings: SGC and CCE) and will indicate the clearly unsolicited nature of these ratings when publishing them along with indication of indication of key information sources for assigning these ratings.¹
3. Rating-Agentur Expert RA GmbH shall not 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 or any credit rating activities of the Agency.
4. Rating-Agentur Expert RA GmbH shall ensure that at least²:
 - a) all substantially material sources, including the rated entity or, where appropriate, a related third party, which were used to prepare the credit rating are indicated together with an indication as to whether the credit rating has been disclosed to that rated entity or its related third party and amended following that disclosure before being issued;
 - b) the principal methodology and the version of methodology that was used in determining the rating is clearly indicated, with a reference to its comprehensive description (the Agency assigns each rating based on one methodology, there are no types of ratings for which two different methodologies are used simultaneously);
 - c) the meaning of each rating category, the definition of default or recovery and any appropriate risk warning, including a sensitivity analysis of the relevant key rating assumptions, such as mathematical or correlation assumptions, accompanied by worst-case scenario credit ratings as well as best-case scenario credit ratings are explained;
 - d) the date at which the credit rating was first released for distribution and when it was last updated is indicated clearly and prominently;
 - e) information is given as to whether the credit rating concerns a newly issued financial instrument and whether the credit rating agency is rating the financial instrument for the first time.
5. Rating-Agentur Expert RA GmbH shall inform the rated entity at least 12 hours before publication of the credit rating and of the principal grounds on which the rating is based in order to give the entity an opportunity to draw attention of the credit rating agency to any factual errors.
6. Rating-Agentur Expert RA GmbH shall state clearly and prominently when disclosing credit ratings any attributes and limitations of the credit rating. In particular, the Agency

¹ Indication in the texts of press releases and color indication on the web page of the Agency.

² See Templates for the press releases.

shall prominently state when disclosing any credit rating whether it considers satisfactory the quality of information available on the rated entity and to what extent it has verified information provided to it by the rated entity or its related third party. If a credit rating involves a type of entity or financial instrument for which historical data is limited, the credit rating agency shall make clear, in a prominent place, such limitations of the credit rating.

7. In a case where the lack of reliable data or the complexity of the structure of a new type of financial instrument or the quality of information available is not satisfactory or raises serious questions as to whether a credit rating agency can provide a credible credit rating, the Agency shall refrain from issuing a credit rating or withdraw an existing rating.
8. When announcing a credit rating, Rating-Agentur Expert RA GmbH shall explain in its press releases or reports the key elements underlying the credit rating.
9. Public ratings and corresponding press-releases shall be published on the official web page of the Agency:
www.raexpert.eu
10. Rating-Agentur Expert RA GmbH shall make sure the individual specificity of a sovereign nation is being analyzed. The Agency's methodologies are designed for assessment of one single country at a time, not a group or block of countries. Each country rating will be issued with its respective Press Release and Research Report.
11. Rating-Agentur Expert RA GmbH shall assure that public communications other than ratings, Press Releases and Research Reports related to potential changes in either solicited or unsolicited ratings are not based or influenced by information surrounding the rated entity that has been disclosed without the consent of the rated entity. If the Agency were to be involved in providing or publishing a public communication other than the usual rating publications, it shall make it clear for the experts of the Rating Service that:
 - a. Information from a rated entity shall never be used without the entity's consent. However, information may be used only if there is no legitimate reason for the rated entity to refuse authorizing such information;
 - b. Most of the cases only publicly available information shall be used to prepare these public communications.
12. Rating-Agentur Expert RA GmbH shall comply with the stated sovereign ratings calendar defined and published in December each year. The Agency understands that the only reason to deviate from the stated calendar is when it is necessary for the Agency to comply with its obligations in under Article 8(2), Article 10(1) and Article 11(1) according to the CRAR.
13. In cases when the expert and the Agency consider that the information is not sufficiently reliable, is incomplete or it is not assured that a trustworthy rating can be prepared, the Agency shall avoid issuing such rating or withdraw an existing rating.
14. Rating-Agentur Expert RA GmbH shall submit to ESMA the information on credit ratings required for publication on the European Rating Platform.

The person responsible for provision of this information shall be the Managing director of the Agency.