Moody's

Rating Action: Moody's affirms deposit and senior unsecured debt ratings of UniCredit Bank AG, changes outlook to stable from negative

23 Nov 2023

Frankfurt am Main, November 23, 2023 -- Moody's Investors Service (Moody's) has today affirmed the A2 long-term senior unsecured debt and deposit ratings of UniCredit Bank AG (UCB) and changed the outlook on these ratings to stable from negative. Concurrently, Moody's affirmed UCB's baa2 Baseline Credit Assessments (BCA) and Adjusted BCA.

The rating action was prompted by the rating action on 18 Italian financial institutions which includes UCB's parent bank UniCredit S.p.A. (UniCredit, deposits Baa1 stable, BCA baa3). For further details, please refer to the following press release "Moody's takes rating actions on 18 Italian financial institutions" (https://ratings.moodys.com/ratings-news/411621), published on 21 November 2023.

For a list of all affected ratings, please refer to the end of this press release.

RATINGS RATIONALE

-- AFFIRMATION OF THE BASELINE CREDIT ASSESSMENT

Moody's affirmation of UCB's BCA reflects the resilience of the bank's fundamental credit profile, supported by its diversified businesses, including retail and corporate banking, as well as its role as UniCredit's group-wide global investment banking center. UCB has built very strong capital buffers and benefits from improved profitability, which the rating agency expects to remain supported by higher interest rates and disciplined cost management. These mitigants will allow UCB to cope with a moderate deterioration of its presently sound asset quality, which the rating agency expects to materialise due to the German economy's sluggish growth outlook. The affirmation also reflects the bank's solid funding and liquidity profiles. UCB benefits from sizeable deposits and diversified market funding sources, including covered bonds. Further, the bank operates with sound, yet somewhat reduced liquidity, which is weakened by moderate asset encumbrance.

While Moody's assesses the bank's financial profile is commensurate with a baa1, the rating agency limits UCB's BC to one notch above the parent because of common branding, intragroup exposures and its interlinkages resulting fro UCB's role as the group's global investment banking center.

-- AFFIRMATION OF RATINGS

The affirmation of UCB's ratings reflects the affirmation of the bank's baa2 BCA and Adjusted BCA, as well as unchanged results under Moody's Advanced Loss Given Failure (LGF) analysis, which results in two notches of rating uplift for UCB's deposits and senior unsecured debt. The rating agency's unchanged moderate assumption for German government support results in one notch of additional rating uplift.

Moody's has assessed under its Advanced LGF analysis, that UCB will maintain a very low loss-given-failure for senior unsecured debt, underpinning the two notches uplift from the bank's baa2 Adjusted BCA. The rating agency expects very moderate balance sheet growth over the rating outlook horizon and stable volume of this loss-absorbing debt class, relative to the size of the bank's balance sheet.

-- OUTLOOK CHANGE TO STABLE FROM NEGATIVE

The outlook change to stable from negative for UCB's long-term deposit and senior unsecured debt ratings reflects th rating agency's assessment that its parent bank UniCredit's overall credit profile will remain resilient, despite prevailing macroeconomic headwinds in the group's core markets namely in Western Europe.

The stable outlook further reflects Moody's expectation that UCB's financial profile and liability structure will remain stable, resulting in unchanged results under Moody's Advanced LGF analysis, including stable volume and subordination of UCB's senior unsecured debt relative to its balance sheet size.

FACTORS THAT COULD LEAD TO AN UPGRADE OR DOWNGRADE OF THE RATINGS

An upgrade of UCB's long-term ratings could be driven by an upgrade of its BCA and Adjusted BCA, which is currentl constrained by the BCA of UniCredit and therefore would require an upgrade of the parent's BCA. UCB's long-term ratings could also be upgraded because of a higher rating uplift resulting from Moody's Advanced LGF analysis.

Moody's Advanced LGF analysis could result in additional notches of rating uplift for UCB if the bank issues more junior and senior loss-absorbing securities than the rating agency currently expects.

UCB's BCA could be downgraded as a result of a downgrade of UniCredit's BCA, or if the financial and non-financial interlinkages between UCB and its parent were to increase, for example, if regulation allowed greater intra-group exposures, or if the bank's financial fundamentals were to deteriorate significantly, resulting in a multi-notch weaker financial profile.

UCB's ratings could also be downgraded, should the bank's volume of loss-absorbing liabilities shrink or in case it expands its balance sheet more than Moody's currently expects.

LIST OF AFFECTED RATINGS

Issuer: UniCredit Bank AG

..Outlook Actions:

....Outlook, Changed To Stable From Negative

..Affirmations:

-LT Counterparty Risk Rating (Foreign Currency), Affirmed A1
-LT Counterparty Risk Rating (Local Currency), Affirmed A1
-ST Counterparty Risk Rating (Foreign Currency), Affirmed P-1
-ST Counterparty Risk Rating (Local Currency), Affirmed P-1
-LT Bank Deposits (Foreign Currency), Affirmed A2, outlook changed to STA from NEG
-LT Bank Deposits (Local Currency), Affirmed A2, outlook changed to STA from NEG
-ST Bank Deposits (Foreign Currency), Affirmed P-1
-ST Bank Deposits (Local Currency) , Affirmed P-1
-ST Deposit Note/CD Program (Local Currency) , Affirmed P-1

-LT Counterparty Risk Assessment , Affirmed A1(cr)
-ST Counterparty Risk Assessment , Affirmed P-1(cr)
-LT Issuer Rating , Affirmed A2, outlook changed to STA from NEG
-Baseline Credit Assessment, Affirmed baa2
-Adjusted Baseline Credit Assessment , Affirmed baa2
-Senior Unsecured Regular Bond/Debenture (Foreign Currency), Affirmed A2, outlook changed to STA from NEG
-Senior Unsecured Regular Bond/Debenture (Local Currency), Affirmed A2, outlook changed to STA from NEG
-Senior Unsecured Medium-Term Note Program (Foreign Currency), Affirmed (P)A2
-Junior Senior Unsecured Regular Bond/Debenture (Foreign Currency), Affirmed Baa2
-Junior Senior Unsecured Regular Bond/Debenture (Local Currency), Affirmed Baa2
- Junior Senior Unsecured Medium-Term Note Program (Local Currency), Affirmed (P)Baa2
-Subordinate Regular Bond/Debenture (Local Currency), Affirmed Baa3
-Subordinate Medium-Term Note Program (Foreign Currency), Affirmed (P)Baa3
-Other Short Term (Foreign Currency), Affirmed (P)P-1
- Issuer: UniCredit Bank AG, London Branch
- ..Outlook Actions:
-Outlook, Changed To Stable From Negative
- ..Affirmations:
-LT Counterparty Risk Rating (Foreign Currency), Affirmed A1
-LT Counterparty Risk Rating (Local Currency), Affirmed A1
-ST Counterparty Risk Rating (Foreign Currency), Affirmed P-1
-ST Counterparty Risk Rating (Local Currency), Affirmed P-1
-LT Bank Deposits (Foreign Currency), Affirmed A2, outlook changed to STA from NEG
-LT Bank Deposits (Local Currency), Affirmed A2, outlook changed to STA from NEG
-ST Bank Deposits (Foreign Currency), Affirmed P-1
-ST Bank Deposits (Local Currency), Affirmed P-1
-LT Counterparty Risk Assessment , Affirmed A1(cr)

-ST Counterparty Risk Assessment , Affirmed P-1(cr)
-LT Issuer Rating (Local Currency), Affirmed A2, outlook changed to STA from NEG
- Issuer: Unicredit Bank AG, Hong Kong Branch
- ..Outlook Actions:
-Outlook, Changed To Stable From Negative
- ..Affirmations:
-LT Counterparty Risk Rating (Foreign Currency), Affirmed A1
-LT Counterparty Risk Rating (Local Currency), Affirmed A1
-ST Counterparty Risk Rating (Foreign Currency), Affirmed P-1
-ST Counterparty Risk Rating (Local Currency), Affirmed P-1
-LT Counterparty Risk Assessment , Affirmed A1(cr)
-ST Counterparty Risk Assessment , Affirmed P-1(cr)
-Senior Unsecured Medium-Term Note Program (Foreign Currency), Affirmed (P)A2
-Subordinate Medium-Term Note Program (Foreign Currency), Affirmed (P)Baa3
-Other Short Term (Foreign Currency), Affirmed (P)P-1
- Issuer: UniCredit Bank AG, New York Branch
- ..Outlook Actions:
-Outlook, Changed To Stable From Negative
- ..Affirmations:
-LT Counterparty Risk Rating (Foreign Currency), Affirmed A1
-LT Counterparty Risk Rating (Local Currency), Affirmed A1
-ST Counterparty Risk Rating (Foreign Currency), Affirmed P-1
-ST Counterparty Risk Rating (Local Currency), Affirmed P-1
-LT Bank Deposits (Foreign Currency), Affirmed A2, outlook changed to STA from NEG
-LT Bank Deposits (Local Currency), Affirmed A2, outlook changed to STA from NEG
-ST Bank Deposits (Foreign Currency), Affirmed P-1
-ST Bank Deposits (Local Currency), Affirmed P-1
-LT Counterparty Risk Assessment, Affirmed A1(cr)

-ST Counterparty Risk Assessment , Affirmed P-1(cr)
-LT Issuer Rating (Local Currency), Affirmed A2, outlook changed to STA from NEG
- Issuer: UniCredit Bank AG, Paris Branch
- ..Outlook Actions:
-Outlook, Changed To Stable From Negative
- ..Affirmations:
-LT Counterparty Risk Rating (Foreign Currency), Affirmed A1
-LT Counterparty Risk Rating (Local Currency), Affirmed A1
-ST Counterparty Risk Rating (Foreign Currency), Affirmed P-1
-ST Counterparty Risk Rating (Local Currency), Affirmed P-1
-LT Bank Deposits (Local Currency), Affirmed A2, outlook changed to STA from NEG
-ST Bank Deposits (Local Currency), Affirmed P-1
-LT Counterparty Risk Assessment , Affirmed A1(cr)
-ST Counterparty Risk Assessment , Affirmed P-1(cr)
- Issuer: Unicredit Bank AG, Singapore Branch
- ..Outlook Actions:
-Outlook, Changed To Stable From Negative
- .. Affirmations:
-LT Counterparty Risk Rating (Foreign Currency), Affirmed A1
-LT Counterparty Risk Rating (Local Currency), Affirmed A1
-ST Counterparty Risk Rating (Foreign Currency), Affirmed P-1
-ST Counterparty Risk Rating (Local Currency), Affirmed P-1
-LT Counterparty Risk Assessment , Affirmed A1(cr)
-ST Counterparty Risk Assessment , Affirmed P-1(cr)
-Senior Unsecured Medium-Term Note Program (Foreign Currency), Affirmed (P)A2
-Subordinate Medium-Term Note Program (Foreign Currency), Affirmed (P)Baa3
-Other Short Term (Foreign Currency), Affirmed (P)P-1

Issuer: Unicredit Bank AG, Tokyo Branch

..Outlook Actions:

....Outlook, Changed To Stable From Negative

..Affirmations:

-LT Counterparty Risk Rating (Foreign Currency), Affirmed A1
-LT Counterparty Risk Rating (Local Currency), Affirmed A1
-ST Counterparty Risk Rating (Foreign Currency), Affirmed P-1
-ST Counterparty Risk Rating (Local Currency), Affirmed P-1
-LT Counterparty Risk Assessment , Affirmed A1(cr)
-ST Counterparty Risk Assessment, Affirmed P-1(cr)
-Senior Unsecured Medium-Term Note Program (Foreign Currency), Affirmed (P)A2
-Subordinate Medium-Term Note Program (Foreign Currency), Affirmed (P)Baa3
-Commercial Paper (Local Currency), Affirmed P-1
-Other Short Term (Foreign Currency), Affirmed (P)P-1
- Issuer: UniCredit U.S. Finance Inc.

..Outlook: NOO

....BACKED Commercial Paper (Local Currency), Affirmed P-1

PRINCIPAL METHODOLOGY

The principal methodology used in these ratings was Banks Methodology published in July 2021 and available at https://ratings.moodys.com/rmc-documents/71997. Alternatively, please see the Rating Methodologies page on https://ratings.moodys.com for a copy of this methodology.

REGULATORY DISCLOSURES

For further specification of Moody's key rating assumptions and sensitivity analysis, see the sections Methodology Assumptions and Sensitivity to Assumptions in the disclosure form. Moody's Rating Symbols and Definitions can be found on https://ratings.moodys.com/rating-definitions.

For ratings issued on a program, series, category/class of debt or security this announcement provides certain regulatory disclosures in relation to each rating of a subsequently issued bond or note of the same series, category/class of debt, security or pursuant to a program for which the ratings are derived exclusively from existing ratings in accordance with Moody's rating practices. For ratings issued on a support provider, this announcement provides certain regulatory disclosures in relation to the credit rating action on the support provider and in relation to each particular credit rating action for securities that derive their credit ratings from the support provider's credit rating. For provisional ratings, this announcement provides certain regulatory disclosures in relation to a definitive rating that may be assigned subsequent to the final issuance of the debt, in

each case where the transaction structure and terms have not changed prior to the assignment of the definitive rating in a manner that would have affected the rating. For further information please see the issuer/deal page for the respective issuer on https://ratings.moodys.com.

For any affected securities or rated entities receiving direct credit support from the primary entity(ies) of this credit rating action, and whose ratings may change as a result of this credit rating action, the associated regulatory disclosures will be those of the guarantor entity. Exceptions to this approach exist for the following disclosures, if applicable to jurisdiction: Ancillary Services, Disclosure to rated entity, Disclosure from rated entity.

The ratings have been disclosed to the rated entity or its designated agent(s) and issued with no amendment resulting from that disclosure.

These ratings are solicited. Please refer to Moody's Policy for Designating and Assigning Unsolicited Credit Ratings available on its website https://ratings.moodys.com.

Regulatory disclosures contained in this press release apply to the credit rating and, if applicable, the related rating outlook or rating review.

The Global Scale Credit Rating(s) discussed in this Credit Rating Announcement was(were) issued by one of Moody' affiliates outside the UK and is(are) endorsed for use in the UK in accordance with the UK CRA Regulation.

Please see https://ratings.moodys.com for any updates on changes to the lead rating analyst and to the Moody's legal entity that has issued the rating.

Please see the issuer/deal page on https://ratings.moodys.com for additional regulatory disclosures for each credit rating.

Swen Metzler, CFA VP - Senior Credit Officer Financial Institutions Group Moody's Deutschland GmbH An der Welle 5 Frankfurt am Main, 60322 Germany JOURNALISTS: 44 20 7772 5456 Client Service: 44 20 7772 5454

Alexander Hendricks, CFA Associate Managing Director Financial Institutions Group JOURNALISTS: 44 20 7772 5456 Client Service: 44 20 7772 5454

Releasing Office: Moody's Deutschland GmbH An der Welle 5 Frankfurt am Main, 60322 Germany JOURNALISTS: 44 20 7772 5456 Client Service: 44 20 7772 5454 © 2023 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

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

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

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

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

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

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

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

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

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

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

Additional terms for Japan only: Moody's Japan K.K. ("MJKK") is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly-owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MJKK. MSFJ is not a Nationally Recognized Statistical Rating Organization ("NRSRO"). Therefore, credit ratings assigned by MSFJ are Non-NRSRO Credit Ratings. Non-NRSRO Credit Ratings are assigned by an entity that is not a NRSRO and,

consequently, the rated obligation will not qualify for certain types of treatment under U.S. laws. MJKK and MSFJ are credit rating agencies registered with the Japan Financial Services Agency and their registration numbers are FSA Commissioner (Ratings) No. 2 and 3 respectively.

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

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