Non-Bank Financial Institutions Criteria

Request for Comments

Purpose

Lianhe Ratings Global Limited's ("Lianhe Global") non-bank financial institutions criteria were originally published on 16 July 2018. The current proposed criteria primarily elaborate on the details of the factors and sub-factors that we consider when assigning ratings to non-bank financial institutions.

Lianhe Global invites market participants to provide comments and feedback on the proposed criteria by 31 March 2022 by submitting their comments and feedback to info@lhratingsglobal.com.

No changes to our existing ratings are expected to result from the adoption of the proposed criteria, as it primarily relates to further supplement to and elaboration of the original criteria published on 16 July 2018.

Scope of the Criteria

Lianhe Global applies the non-bank financial institutions criteria to non-bank financial institutions globally, including securities firms, finance companies and leasing companies. For some financial institutions offering a wide range of financial services (e.g., financial conglomerates), Lianhe Global uses the criteria corresponding to the institution's main business activities and key risk features and may employ the other criteria to complement the analysis.

Securities firms' business lines include securities brokerage, financial advisory services, investment banking and securities trading. Finance companies offer commercial and consumer financing, including loans for housing, automobiles, business ventures and individuals and debt purchases (i.e. companies that buy portfolios of defaulted assets or non-performing loans), as well as associated services. Leasing companies provide physical assets or services for use by commercial clients or individuals for a period of time (sometimes with provisions to purchase assets at the end of the contract) in return for regular payments. Leasing assets include passenger vehicles, office equipment, industrial equipment, ships, aircrafts, etc.

Furthermore, the criteria do not represent a comprehensive coverage but only address key rating factors.

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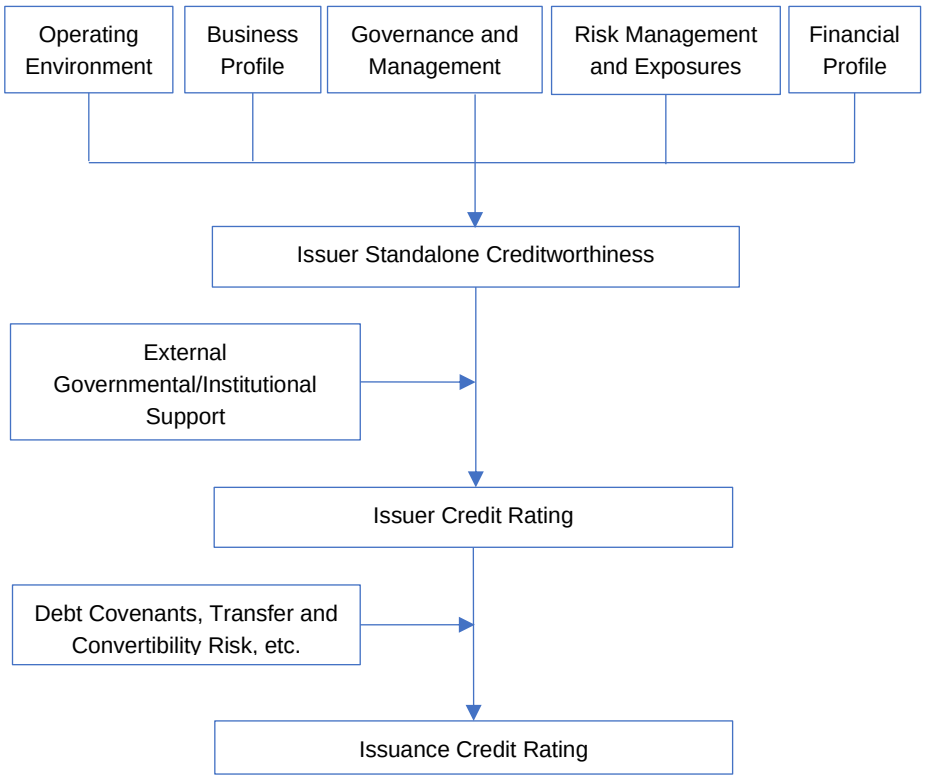
Overview

The criteria report explains Lianhe Global's general approach to assessing a non-bank financial institution's standalone credit profile and the likelihood of external support that the entity will receive in case of need, i.e. to sustain the institution's viability. We incorporate the availability of external support into the assessment of a non-bank financial institution's standalone credit strength to assign a credit rating to the entity.

The most common form of support for a non-bank financial institution is the institutional support from the entity's parent. Government support is not common for most non-bank financial institutions given the lack of systemic importance, although this may be available for an institution with a policy role.

The diagram below illustrates the topology of the criteria:



Standalone Creditworthiness Analysis

The analysis of a non-bank financial institution's standalone creditworthiness is assessing the probability of the entity that will default or need to receive external support to avoid a default. We use a combination of qualitative and quantitative analysis to assess five key credit factors: the operating environment, business profile, governance and management, risk management and exposures, and financial profile.

The standalone assessment considers operational support, from which a non-bank financial institution benefits in the usual course of business, such as complementary product offerings, funding facilities and knowledge and information sharing from its parent and affiliates. In addition, ratings assigned are based on our forward-looking expectations. We assess a non-bank financial institution's financial history as well as its strategy and business model to arrive at a forward-looking view of its credit profile.

Key Credit Factor	Sub Factor
Operating Environment	Sovereign Rating
	Macroeconomy
	Legal and Regulatory Environment
	Industry Profile
Business Profile	Franchise and Market Position
	Business Mix and Diversification
Governance and Management	Corporate Structure and Governance
	Management Quality
	Business Strategy and Execution
Risk Management and Exposures	Risk Policy and Framework

Key Credit Factor	Sub Factor
	Credit Risk Profile
	Market Risk Exposure
Financial Profile	Capital Adequacy
	Asset Quality
	Profitability
	Liquidity and Funding

Operating Environment

The operating environment often has a significant influence on the other aspects of a non-bank financial institution's credit profile. Weakening sovereign strength can affect the credit quality of a non-bank financial institution operating in that jurisdiction as the deterioration usually relates to economic weaknesses or system-wide issues. A volatile economic environment may impair a non-bank financial institution's earnings stability and asset quality. Competition tends to be intense in a fragmented market, while concerns over corporate governance and transparency are usually more pronounced within an underdeveloped legal system and regulatory framework.

Internal Assessment on Sovereign Credit Profiles

Sovereign strength often has a significant impact on a non-bank financial institution's credit profile domiciled in that country. In limited circumstances (such as with a strong overseas presence), a non-bank financial institution's rating may exceed the sovereign rating.

We use internal assessment to gauge sovereign credit profiles. We apply both commonly accepted quantitative and qualitative metrics to conduct the sovereign analysis. In addition, we apply elements from recognised third-party indexes such as World Bank's Worldwide Governance Index, Human Development Index, Easy of Doing Business Index to maintain neutrality and objectivity in our analysis. We believe these indexes provide us with a platform to conduct our analysis in a non-ideologically biased setting.

Macroeconomy

A country's economy usually affects a non-bank financial institution's operation through its impact on the business and financial environment. Factors taken into consideration include the stage of economic development, and the economic growth pace and expectations. We also consider other attributes that may affect the healthiness of the economic environment. This may include the aggregate indebtedness of the country and growth, the stability of interest rates and exchange rates, inflation rates and employment and demographic prospects.

Legal and Regulatory Environment

A well-established legal system and regulatory framework contribute to the financial sector stability. We consider that a comprehensive and effective legal system should provide adequate protection to property and creditor rights, and have a reliable, efficient and independent justice system. A prudent regulatory system often requires a market-based regulatory and supervisory framework with an independent authority. The regulator has willingness and capability to intervene and enforce laws and regulations, including dealing with problematic financial institutions and potential contagion risk. Internationally comparable accounting standards and proper auditing procedures are also important to ensure the reliability and integrity of financial information.

Industry Profile

The market structure and competitiveness affect a non-bank financial institution's business strategy and development. An oligopolistic market may create obstacles for new participants and protect existing institutions' franchise and market position. However, deregulation may encourage them to focus on capital adequacy and operating efficiency and to put emphasis on shareholder value. We analyse the industry profile by looking at the size and number of market participants, products and services provided, business growth, deregulation of financial services and opening up to international competition.

Business Profile

A non-bank financial institution's business profile, franchise and competitive position influence its current financial performance and creditworthiness and the sustainability for a long run.

Franchise and Market Position

A non-bank financial institution's franchise value is usually reflected in its resilient and sustainable market position, comprehensive product and service offerings, and wide market coverage. Large entities generally have a competitive advantage with business leadership and pricing power as well as the benefit of economies of scales. However, small market presences may be offset by a sustainable business model in a specific region or in niche product or client segments.

Being part of a larger (typically financial) group can be beneficial to a non-bank financial institution's franchise with the access to a larger clientele base and business synergies from other group members. Conversely, reputational and contagion risks may arise should its affiliates have weaker credit profile.

Business Mix and Diversification

Diversified revenue streams from various business lines and regions can support a non-bank financial institution's earnings stability through economic and credit cycles. On the other hand, a concentrated business profile (e.g., a high reliance on volatile activities, such as securities trading, or a narrow product/client focus) can cause high earnings volatility and concentration risk. Lack of business diversification is usually a credit weakness for non-bank financial institutions.

Business Profile Assessment

	aaa	aa	a	bbb	bb	b	ccc and below
Franchise and Market Position	Extremely strong market position with very superior competitive advantages in product pricing, business diversity and scale.	Very strong market position with superior competitive advantages in product pricing, business diversity and scale.	Strong market position with competitive advantages in product pricing, business diversity or scale.	Adequate market position and may have some advantages in certain areas.	Less than adequate market position and a market follower.	Weak market position and a market follower. Lack of business diversity and scale.	Very weak market position with disadvantages in pricing, product offerings and scale.

Business Mix and Diversification	Exceptionally diversified and steady revenue streams from various business lines or regions. Very limited reliance on volatile activities.	Very diversified and steady revenue streams from various business lines or regions. Limited reliance on volatile activities.	Reasonably diversified and steady revenue streams from various business lines or regions. Moderate reliance on volatile activities.	Less diverse or steady revenue streams from narrower business lines or regions. More reliance on volatile activities.	Less diverse and steady revenue streams from narrow business lines or with geographic concentration. Significant reliance on volatile activities.	Limited diversity and volatile revenue streams. Heavy reliance on volatile activities or economic conditions.	Very volatile revenue streams with an evolving business model.

Governance and Management

Prudent governance and professional management are essential for the achievement of a non-bank financial institution's business and financial objectives and ensuring good internal control and in compliance with regulatory requirements.

Corporate Structure and Governance

Prudent governance practices support a non-bank financial institution to achieve long-term business success and financial stability. The board members (directors) are elected by the shareholders to oversee the institution's interest in the long-term health and the overall success of the business and financial strength. We examine features (including but not limited to) such as the ownership and organisational structure, reporting hierarchy, board composition and independence, board committees, related party transactions, material litigations, and prior regulatory sanctions, etc.

A complex and opaque organisational structure, including layers of intermediate holding companies, may raise concerns over effective management, corporate governance and inappropriate intra-group transactions. Publicly listed entities usually have better disclosures and governance practices as they must abide by both listing and regulatory rules. However, private-owned institutions are not necessarily calls for concern.

Management Quality

Professionalism and integrity are two important features in quality management. A solid management team shows good credibility and competence. It manages business in a professional and ethical manner and has a proven record of achieving an institution's business and financial goals. The remuneration scheme is established to ensure the alignment of the management's interests and risk preferences with those of the organisation and its stakeholders. Mitigations of key man risk (such as an established succession plan) are also essential especially for an institution with a reliance on a specific individual or a few individuals.

Business Strategy and Execution

Business objectives give a non-bank financial institution a guideline and direction from where to start and where the organisation is going, while successful execution turns strategic objectives into performance. The objective setting should be clearly-defined, measurable, and achievable. It takes into account the entity's operating environment, business model, management expertise, and competitive position, and balances risks and rewards.

Risk Management and Exposures

Concentrated risk profile due to a monoline focus or a narrow customer base and high reliance on wholesale funding are common risk features of non-bank financial institutions. Risk control is an integral part to support a non-bank financial institution's credit strength and resilience throughout an economic cycle. An effective risk management can help the institution identify, measure, monitor, and control or mitigate risks and protect the entity's capital base and earnings without hindering growth.

Risk Management Framework

A sound risk management framework should be able to identify the risk universe and quantify specific and aggregate risk exposure, as well as potential loss. Risk mitigation mechanisms are well established to ensure the risk levels remain at an optimal threshold. Risk policies and governance clearly define and segregate duties and assign authority to employees, committees and the board for approval and execution of various risk limits and exceptions to limits.

Credit Policy and Profile

Credit risk is the risk that a customer or counterparty in a transaction may default. It arises from the lending, leasing, trading and other activities undertaken by a non-bank financial institution. We examine a financial institution's credit policy and underwriting standards, including its lending criteria, collateral requirements, concentration limits and impairment and provisioning policies, as well as the soundness of its internal credit rating system, scorecards, or third-party databases such as credit bureaus. We pay additional attentions to residual value risk management (such as assets under lease monitoring and loan recovery management) for those institutions which significantly rely on collateral disposals to secure their risk exposures.

Quantitative aspects mainly focus on the degree of borrower, sector and geographic concentrations of a non-bank financial institution's lending business, loan-to-value ratios, provision coverage, and off-balance-sheet exposure. A concentrated risk profile may increase a non-bank financial institution's vulnerability to deteriorations of a counterparty's credit profile or a relatively undiversified regional economy. A counterparty's loss of confidence in this institution may also significantly affect the entity's revenues and profits. We look into the nature of the institution's businesses to identify any potential high asset and/or cash flow volatility.

Liquidity and Capital Management

Liquidity is generally defined as the ability of a non-bank financial institution to meet its debt obligations without incurring unacceptably large losses. A healthy liquidity profile often requires effective liquidity analysis and projections to identify potential funding issues, diversified funding sources, sufficient liquidity cushion and contingency funding plans in place. Ability to secure investors' confidence is essential as most non-bank financial institutions lack deposit taking franchises and primarily rely on wholesale funding. Liquidity projections should be made under both normal conditions and a range of stress scenarios. Early warning indicators for liquidity shortages also help the institution take pre-emptive actions.

Effective capital management identifies a non-bank financial institution's capital needs for various business activities depending on the risks taken by each business division and in accordance with the requirements of relevant regulatory authorities. It helps ensure the institution's capital adequacy is commensurate with the risk involved and in compliance

with relevant statutory limits, taking into account business growth, dividend pay-outs, potential capital market volatility and other relevant factors.

Market Risk

Market risk mainly refers to the risk of incurring losses due to fluctuations in the value of a non-bank financial institution's assets and liabilities caused by market movements, including the changes in interest rates, prices of securities, exchange rates and collateral values. We assess the scale of the risks relative to the institution's ability to absorb the impacts of sudden and substantial market movements and the entity's control mechanisms and hedging practices to monitor and mitigate the risks.

Quantitative measures usually include value at risk (VaR), stop-loss limits, concentration limits (by product, counterparty, industry and region), sensitivity analysis and stress testing. We also review policies with respect to collateral requirements and margin calls for securities firms as their brokerage business is heavily influenced by capital market dynamics.

Operational Risk

Operation risk arises from employee misconduct, inadequate or failed internal procedures and processes, inadequate management of information and other systems, as well as unforeseeable external events. A non-bank financial institution should implement monitoring systems for operational risk exposures and losses for major business lines and enforce control or mitigation mechanisms through regular internal auditing. Infrastructure investments should commensurate with the nature of the business. Securities firms' trading and risk management systems need to cope with the increase in trading volume, speed, volatility and product complexity in capital markets.

Risk Management and Exposures Assessment

	aaa	aa	a	bbb	bb	b	ccc or below
Risk Policy and Framework	Risk management process and controlling mechanisms are extremely comprehensive and well developed. Risk thresholds are exceptionally conservative and strictly followed.	Risk management process and controlling mechanisms are very comprehensive and well developed. Risk thresholds are very conservative and strictly followed.	Risk management process and controlling mechanisms are reasonably comprehensive and developed. Risk thresholds are conservative and effectively followed.	Risk management process and controlling mechanisms are adequate. Risk thresholds are reasonable and generally followed.	Risk management process and controlling mechanisms may have some deficiencies. Risk thresholds are acceptable. Breaches of limits are more noticeable.	Risk management process and controlling mechanisms are underdeveloped. Risk thresholds are more relaxed and breaches of limits are frequent.	Risk management process and controlling mechanisms are poor with aggressive risk thresholds.
Credit Risk Profile	Credit risk profile is highly diversified with a very minimal degree of borrower, sector or geographic concentrations. Extremely conservative lending criteria, collateral requirements, and impairment and provisioning standards.	Credit risk profile is very diversified with a minimal degree of borrower, sector or geographic concentrations. Very conservative lending criteria, collateral requirements, and impairment and provisioning standards.	Credit risk profile is diversified with moderate borrower, sector or geographic concentrations. Prudent lending criteria, collateral requirements, and impairment and provisioning standards.	Credit risk profile is reasonably diversified. Borrower, sector or geographic concentrations may exist but manageable. Adequate lending criteria, collateral requirements, and impairment and provisioning standards.	Credit risk profile has more pronounced borrower, sector or geographic concentrations. Lending criteria, collateral requirements, and impairment and provisioning standards are below industry averages.	Significant borrower, sector or geographic concentrations. Relaxed lending criteria, collateral requirements, and impairment and provisioning standards.	A high degree of borrower, sector or geographic concentrations. Very relaxed lending criteria, collateral requirements, and impairment and provisioning standards.

Market Risk Exposure	Very low proprietary trading positions. Interest rate and foreign exchange risks are very low and effectively mitigated through hedging.	Low proprietary trading positions. Interest rate and foreign exchange risks are low and effectively mitigated through hedging.	Modest proprietary trading positions. Interest rate and foreign exchange risks are modest and appropriately mitigated through hedging.	Proprietary trading positions and exposures to interest rate and foreign exchange risks are in line with industry averages. Adequate hedging mechanisms are in place.	Market risk exposures are more pronounced. Basic hedging strategies may be used.	Market risk exposures are high. Mitigations through hedging may not be effective.	Market risk exposures are very high. Mitigations through hedging may not be used.

Financial Profile

We examine a non-bank financial institution's financial profile by analysing key financial metrics, including their historical trends, stability and expectations. Financial metrics can be various depending on the institution's business model. We may reclassify items derived from the institution's financial statements to fit our standard spreadsheets and ratio calculations for greater comparability across regions and/or for better measurements of the entity's financial position. Common treatments may involve excluding nonrecurring gains/losses from operating profits, deducting intangible assets from eligible capital, or including restructured loans in impaired loans.

Capital Adequacy

Capital serves as a buffer that absorbs losses and sustains a non-bank financial institution's viability. Stringent capital requirement prevents an institution from taking excessive risk and increases incentives for better risk management to safeguard shareholders' equity. Adequate capitalisation also helps maintain both public and regulatory confidence in an institution. Key financial metrics include the capital adequacy ratio and composition (core and supplementary capital), equity to assets ratio, and debt to earnings before interest, taxes, depreciation and amortisation.

Total Capital Adequacy Ratio

This is a regulatory capital ratio reported by a non-bank financial institution. It is the amount of total regulatory capital divided by the amount of total risk-weighted assets ("RWAs"). Total regulatory capital usually consists of core equity capital and supplementary capital (such as subordinated debts). RWAs are an estimate of risk that determines the minimum level of regulatory capital a non-bank financial institution must maintain to deal with unexpected losses. A prudent and credible calculation of RWAs is an integral element of the risk-based capital framework. This ratio serves as a measurement of a non-bank financial institution's capacity to absorb losses before it becomes insolvent.

Tangible Common Equity to Tangible Total Assets

The equity-to-assets ratio serves as non-risk-based capitalisation measurements complementary to the risk-based capital framework.

Asset Quality

Analysis of a non-bank financial institution's asset quality focuses on the loan portfolio and securities investments. We also inspect other on- and off-balance sheet credit exposures to have a sound understanding of the overall asset quality. Absolute and relative loan growth rates (compared with industry averages and the underlying economic growth) help assess an institution's risk appetite and asset quality trend. Key financial metrics include

classification of loans according to their performance and provisions made against them, the ratio of impaired loans to gross loans, and loan impairment charges to gross loans.

Impaired Loans to Gross Loans

The ratio of impaired loans to gross loans shows how many impaired loans contributing towards gross loans. Impaired loans generally comprise loans 90 days past due (unless with sufficient collateral to ensure full repayment) and those loans having incurred impairment but not yet 90 days past due. However, impairment assessment may vary among non-bank financial institutions and different jurisdictions.

Loan Impairment Charges to Average Gross Loans

The ratio measures a non-bank financial institution's credit cost by dividing impairment charges for loans and advances by average gross loans. The ratio's long-run performance throughout a business cycle usually provides a good indicator of a non-bank financial institution's asset quality.

Profitability

Internal earnings generation capability is important to support a non-bank financial institution's capital adequacy and future business expansion as well as maintain investors' confidence for ongoing debt refinancing needs. We look at the level of profitability and earnings quality, diversification and stability. Key financial metrics include returns on assets/equity, profit margins, contributions of fee-based income, impairment charges to pre-provision profits, and the cost-to-income ratio. We may exclude nonrecurring income/expenses in the ratio calculations if deemed necessary.

Net Profit/Pre-provision Profit to Average Total Assets

These ratios measure the profits generated by assets during a period by dividing net profit/pre-provision profit by average total assets. These ratios provide an estimate of the efficiency in using assets to create profit, although do not reflect how risky the assets been deployed.

Liquidity and Funding

Wholesale funding can be very sensitive to changes in the credit risk profile of a non-bank financial institution or to interest rate movements. We assess the institution's readily available liquid assets, committed credit facilities and contingency funding plans to meet its debt obligations and potential funding needs. Key financial metrics include liquid assets to short-term debts, unencumbered assets to unsecured debt and interest coverage. We also analyse a non-bank financial institution's funding structure to assess its funding diversity and stickiness.

Short-term Debt/Unsecured Debt to Total Debt

These ratios help us assess a non-bank financial institution's funding structure, stability and reliance on wholesale funding by comparing its short-term debt/unsecured debt as a percentage of total debt. Greater reliance on short-term debt and/or secured debt usually indicates relatively weak funding capability and stability.

Liquidity Assets to Short-term Debt

This is a ratio expressed as a percentage of the amount of high-quality liquid assets to the amount of a non-bank financial institution's short-term debt. The ratio aims to assess whether a non-bank financial institution holds a sufficient liquidity reserve to support its

short-term debt obligations. High-quality liquid assets are cash or assets that can be converted into cash quickly with no significant loss of value.

Financial Profile Assessment

	aaa	aa	a	bbb	bb	b	ccc and below
Capital Adequacy	Extremely strong capitalisation against downturns and stressed situations with very solid buffers over regulatory minimums. Exceptionally good accessibility to capital.	Strong capitalisation against downturns and stressed situations with solid buffers over regulatory minimums. Very good accessibility to capital.	Good capitalisation against downturns and stressed situations with significant buffers over regulatory minimums. Generally good accessibility to capital.	Capitalisation is slightly vulnerable to downturns or stressed situations with adequate buffers over regulatory minimums. Accessibility to capital may be less certain.	Capitalisation is vulnerable to downturns or stressed situations with moderate buffers over regulatory minimums. Accessibility to capital may be questioned.	Capitalisation is very vulnerable to downturns or stressed situations with very small buffers over regulatory minimums. Accessibility to capital is in doubt.	Capitalisation is not commensurate with risk. May need or require capital injections to meet regulatory minimums.
Asset Quality	Extremely low levels of impaired assets and credit costs throughout the cycle.	Very low levels of impaired assets and credit costs throughout the cycle.	Generally low levels of impaired assets and credit costs with modest fluctuations throughout the cycle.	Manageable levels of impaired assets and credit costs with slightly more fluctuations throughout the cycle.	Above average level of impaired assets with noticeable fluctuations throughout the cycle. Impairment charges could pressure capitalisation.	Weak and volatile asset quality with high levels of impaired assets or impairment charges, causing significant pressure on capitalisation.	Very weak and volatile asset quality with very high levels of impaired assets or impairment charges, causing heavy pressure on capitalisation.
Profitability	Highly steady and predictable profitability. Extremely good earnings quality with profitability levels persistently commensurate with inherent risk.	Very steady and predictable profitability. Very good earnings quality with profitability levels persistently commensurate with inherent risk.	Generally steady and predictable profitability. Good earnings quality with profitability levels commensurate with inherent risk.	Profitability may be slightly cyclical. Earnings levels are generally commensurate with inherent risk.	Profitability may be volatile. Earnings levels may not commensurate with inherent risk.	Weak and volatile profitability. Earnings levels are not commensurat e with inherent risk.	Very weak and volatile profitability. Earnings sustainability is in doubt.
Liquidity and Funding	Highly stable liquidity and funding. Funding sources are extremely diversified. Contingency funding plans are extremely robust.	Very stable liquidity and funding. Funding sources are very diversified. Contingency funding plans are very robust.	Stable liquidity and funding. Funding sources are diversified with moderate reliance on short-term funding. Contingency funding plans are well established.	Generally stable liquidity and funding. Moderate reliance on less stable wholesale funding. Contingency funding plans are adequate.	Liquidity and funding are somewhat vulnerable to unfavourable market conditions. More reliance on less stable wholesale funding or noticeable funding concentrations. Contingency funding plans may not be sufficient.	Liquidity and funding are vulnerable to unfavourable market conditions. Significant reliance on less stable wholesale funding. Contingency funding plans may not be in place.	Unstable liquidity and funding. Contingency funding plans are in doubt.

External Support Assessment

External support assessment focuses on extraordinary support a non-bank financial institution may receive usually at the point of failure or not long before in order to sustain its viability, while ordinary/operational support a non-bank financial institution benefits in the usual course of business has been considered in the standalone assessment.

External support typically comes from the governmental authorities of the country/region where the non-bank financial institution is domiciled or from the institution's shareholders. Governmental authorities include the government of the nation, any political subdivision thereof, whether state or local, and any agencies and regulatory bodies pertaining to the government. We assess both the capability and willingness of the potential supporter to provide assistance to sustain the institution's viability.

Government Support

In assessing government support, we consider that the government's internal assessment best captures its capability to provide support to a non-bank financial institution. We also look at relevant legislation and regulations to assess the government's willingness to provide support. The government statements on the intention to bail out failed non-bank financial institutions and track record of support help gauge the propensity. In addition, the interconnectedness of non-bank financial institutions in the sector may influence the tendency.

In terms of the government's tendency to provide support to a specific non-bank financial institution, the institution's government ownership, systemic importance, and policy role are key considerations in assessing the public authority's willingness to provide support. We consider that a meaningful or long-term strategic government ownership or a private non-bank financial institution with strong government relations (e.g. close relationships between government officials and shareholders) may indicate the authority's high tendency to provide support. In particular, a government may face high reputational risk if it allows a state-owned/controlled non-bank financial institution to default. That said, support from government authorities is usually less common for non-bank financial institutions than for banks, given their generally relatively smaller size and influence on the overall financial system.

Institutional Support

The institutional parent's credit strength as reflected in its issuer rating, its relative size to the subsidiary, and relevant regulations governing the group's operations (particularly the capital and liquidity flows within the group), affects the parent's ability to provide support. For example, regulatory restrictions on the fungibility of capital and liquidity within a group may reduce the ability of the owner to provide support. Conversely, existences of regulatory requirements to support the subsidiary can positively influence the issuer rating assigned to the subsidiary, even where the propensity to support might be low. In cases where the subsidiary represents a relatively large part of the consolidated group, the owner may find it difficult to provide sufficient support. Furthermore, we may assign the issuer rating to the subsidiary based on the group's consolidated profile if the subsidiary and other entities within the group are highly integrated in terms of management, funding fungibility and operations. The resulting of the support will not weaken the parent's rating.

The strategic importance of the non-bank financial institution to its parent is usually the key factor in assessing the parent's willingness to provide support. The likelihood tends to be high should the subsidiary represent an essential part of the group's operation, carry the same brand name, and its failure may bring reputational risk to the group. The existence of any form of guarantee or commitment to support the subsidiary or cross-default clauses also help our assessment. In addition, we consider that a non-bank financial institution's parent company owning a high majority stake or its controlling owner with strong influence on the non-bank financial institution's operations may have high tendency to support. A controlling interest is usually with voting shares of over 50% to prevail in any stockholders'

motion. Other circumstances can be considered to determine whether a party still holds a controlling ownership despite owning less than the majority of the voting shares.

Country risk of the jurisdiction a non-bank financial institution domiciled may also affect our assessment when the risk may limit the non-bank financial institution's ability to use support from its owner to service its obligations. The issuer rating of the non-bank financial institution may be capped at levels significantly below those which would be assigned based on the owner's ability and propensity to provide support. In addition, when the owner's rating has factored in potential government support, we assess whether this support would flow through to the subsidiary by looking into relevant regulations. The owner's propensity to support may also influence the regulator's decision on whether to let the support flow through.

For a captive finance company belonging to a larger company and providing financing services associated with the parent's business, we may rate the entity primarily or solely on the basis of parental support. In these cases, the entity's strategic importance, its parent's credit strength and support agreements (if any), are key considerations for the rating.

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