

#### **SECTOR IN-DEPTH**

17 April 2024



#### Contacts

Cristiano Ventricelli +39.02.91481.148 VP - Senior Analyst, Digital Assets cristiano.ventricelli@moodys.com

Marat Faritov +49.152.231.11567 AVP – Analyst, Digital Assets marat.faritov@moodys.com

Brandon O'Halloran +1.212.553.4838 AVP – Analyst, Digital Assets brandon.o'halloran@moodys.com

Rajeev Bamra +1.212.553.5878 SVP & Head of Strategy, Digital Economy rajeev.bamra@moodys.com

Fabian Astic +1.212.553.6814

Managing Director, Global Head of Digital

Economy

fabian.astic@moodys.com

» Contacts continued on last page

44-20-7772-5454

#### **CLIENT SERVICES**

**EMEA** 

Americas 1-212-553-1653 Asia Pacific 852-3551-3077 Japan 81-3-5408-4100 Digital Economy – Cross Region

# Tokenization could boost liquidity for alternative assets

#### Summary

Alternative investments – a wide range of assets beyond traditional stocks and bonds, including natural resources, art or private equity – have grown popular among investors seeking higher returns and lower volatility. However, these assets often have large minimum investment requirements, liquidity constraints that lock up capital for extended periods, and lack transparency. Tokenization¹ – the process of converting a traditional asset into a digital token that is storable and transferable using blockchain² technology – can mitigate some of these limiting factors and help develop a liquid secondary market for alternative assets.

**Secondary markets powered by blockchain could improve alternative assets' liquidity.** Blockchain networks could offer a clearer view into the relatively opaque world of alternative assets thanks to token holders' real-time information on their tokenized assets. Additionally, tokenization, through fractionalized ownership, would lower barriers to accessing certain types of alternative assets, <u>making these illiquid assets much easier to trade</u>. As secondary markets develop and the investor base widens, alternative assets could become much more liquid.

**Tokenization of alternative assets could lower costs for investors and distributors.**For investors, efficiencies gained through tokenization, such as lower issuance costs, could translate into higher returns, as asset managers pass on some of their savings. Distributors benefit from lighter overhead and less administrative burden, freeing up resources to deepen client relationships and innovate with new products. The <u>integration of AI</u> into financial institutions' operations could amplify tokenization's advantages.

**Small-scale transactions are already underway in the tokenized alternative assets space**. Traditional financial institutions have already made some of their private equity and private credit investment opportunities available on private and public blockchains<sup>3</sup> through feeder funds. Minimum investment thresholds for these <u>tokenized funds</u> are significantly lower than for their traditional counterparts. In decentralized finance<sup>4</sup>, a few platforms are facilitating private credit transactions through the use of smart contracts<sup>5</sup>.

**Tokenization of alternative assets faces several hurdles.** There are several factors limiting widespread adoption of tokenized assets. Regulatory and legal uncertainty stands as a principal barrier, with many aspects of tokenization still in a legal gray area. There are technical hurdles, particularly the critical need for seamless integration between on-chain and off-chain operations. Lack of a reliable digital cash option and interoperability among blockchain platforms also impede the development of a robust secondary market.

### Tokenization, powered by blockchain, could build up secondary markets for alternative assets

At the end of 2023, institutionally adopted alternative investment assets under management (AUM) totaled \$22 trillion, or 15% of global AUM across all investment classes, a share that could increase to as much as 24% by 2025, according to the Chartered Alternative Investment Analyst (CAIA) Association.<sup>2</sup>

Alternative investments include a wide range of asset classes beyond publicly traded stocks and bonds, including hedge funds, private equity, venture capital and private debt investments as well as real assets such as real estate, infrastructure, and natural resources. Alternative assets offer diversification benefits, less correlated returns, and frequently high yields; however, they come with several drawbacks.

Exhibit 1
The alternative investments space includes a wide variety of structures and instruments
Data in \$ trillion

\$9.2T Private Equity	\$3.8T Real Estate		
	\$1.6T Private Debt	\$1.4T Natural Resources	\$1.2T Infrastructur

Source: Chartered Alternative Investment Analyst (CAIA) Association

One of the primary difficulties investors in alternative assets face is their investments' limited liquidity compared to traditional assets such as stocks and bonds. Many alternative investments, including private equity, hedge funds, and certain real estate holdings, have long lockup periods, meaning investors cannot always access their capital when needed. Illiquidity can pose significant risks, particularly during periods of market distress or unexpected financial needs.

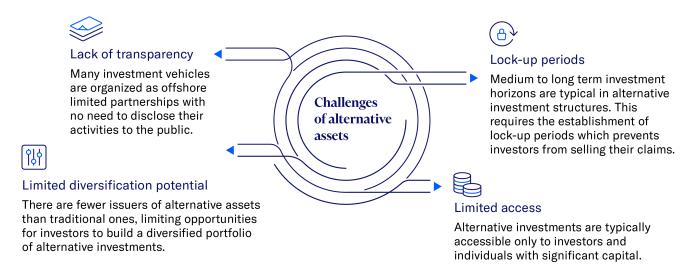
Valuing alternative investments can also be inherently complex because of these investments' unique characteristics and lack of standard pricing mechanisms. Unlike publicly traded securities with readily available market prices, alternative assets often require specialized valuation techniques. Determining the fair value of private equity holdings, real estate properties, or venture capital investments involves subjective judgments, and valuations can be influenced by factors such as market conditions, asset performance, and investor sentiment.

Information about alternative investments' performance or underlying assets may not be readily available to investors, especially in private markets where information disclosure may be limited. Although this lack of transparency is, to some extent, inherently related to the very nature of the private assets sector, it could undermine investor confidence and hinder effective decision-making.

Access to alternative investments is typically restricted to accredited or institutional investors, which excludes retail investors from potentially lucrative opportunities. High minimum investment requirements and management fees associated with some alternative investment vehicles may also present affordability obstacles for individual investors. Innovative platforms and investment structures – tokenization, for example – could help overcome these barriers.

This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the issuer/deal page on https://ratings.moodys.com for the most updated credit rating action information and rating history.

Exhibit 2
Structural challenges of alternative assets are limiting their mainstream adoption



Source: Moody's Ratings

Tokenization, through its innovative use of blockchain technology and smart contracts, could introduce multiple benefits and practical use cases for alternative investments, reshaping the way assets are managed, traded, and owned. At its core, tokenization is the conversion of physical assets or financial instruments into digital tokens on a blockchain, offering a new layer of efficiency, accessibility, and flexibility previously unattainable in traditional investment structures.

#### Tokenization of alternative assets could lower costs for investors and distributors

Tokenization streamlines various operational aspects of asset management, from issuance and trading to settlement and custody. By automating these processes through smart contracts – programs that run automatically when predetermined conditions are met – tokenization reduces the need for intermediaries, lowers transaction costs, and speeds up settlement times. This operational efficiency is beneficial not just for investors but also for issuers and platforms, enabling them to offer more competitive and attractive investment products.

Blockchain provides investors with real-time access to information regarding their investments and underlying assets. However, there is some debate within the asset management industry over to what degree transparency is beneficial for alternative asset investments. Some market participants argue that increased transparency of these investments could undermine asset managers' unique strategies to achieve higher investment yields. Additionally, some argue, more frequent scrutiny of metrics relating to alternative assets could favor a short-term performance focus, detracting from long-term strategies.

Transparency, nonetheless, could yield advantages in areas that may be of mutual interest to both the buy side and sell side of alternative asset products. This visibility could help foster trust and confidence among investors, particularly in markets or asset classes for which information has not been readily available. Additionally, tokenization can simplify compliance with regulatory requirements, because smart contracts can be programmed to enforce investor eligibility, anti-money laundering (AML), and know-your-customer (KYC) regulations automatically.

One of the most significant advantages of tokenization is the enhancement of liquidity for traditionally illiquid assets. By breaking down large assets into smaller, tradable tokens, investors can buy and sell their stakes in dedicated secondary markets with much greater ease, creating opportunities for investment and divestment that were previously limited by the illiquidity of these assets. This increased liquidity not only makes these investments more attractive but also more accessible to a broader range of investors.

Secondary markets facilitate price discovery and risk diversification, allowing investors to more accurately gauge an asset's market value, and to diversify their portfolios by investing in a wider variety of assets through tokenization, reducing overall investment risk.

Exhibit 3
The advantages of tokenization could span the broader alternative investments sector

■ Low ■ Medium ■ High	Liquidity	Efficiency	Transparency
Hedge Funds	•		
Private Equity	•	•	•
Private Credit	•	•	•
Venture Capital	•	•	•
Real Estate		•	
Infrastructure			
Natural resources	•	•	•

Source: Moody's Ratings

## The convergence of artificial intelligence (AI) and the tokenization of alternative investments could further transform investing.

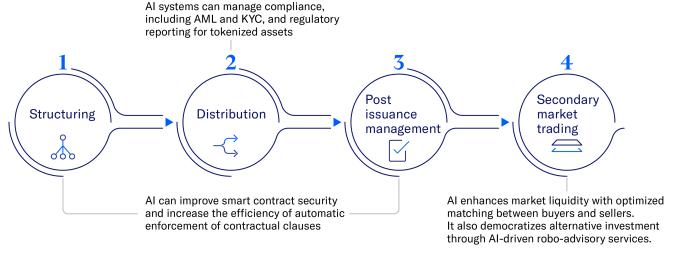
The combination would enhance market analysis and decision-making, where Al's prowess in parsing extensive market data and trends can significantly benefit investors in the tokenized asset space. Assets like real estate, art, and private equity could be evaluated with a depth previously unattainable, allowing for more nuanced investment decisions.

Navigating regulations would also be less daunting with AI-driven automation, ensuring tokenized assets align perfectly with legal standards even across multiple jurisdictions. In regulatory reporting, it could minimize errors and reduce overhead costs.

In portfolio management, AI tools could provide personalized, real-time insights and recommendations, enabling investors to optimize their holdings in tokenized assets efficiently, aligning investment strategies more closely with individual goals and risk appetites. AI can also further boost liquidity of tokenized assets by predicting liquidity trends and matching buyers and sellers to ensure more fluid and efficient market operations.

Security is another critical area where Al's integration with blockchain technology can make a significant difference. By monitoring transactions for irregularities and potential threats, Al ensures a safer investment environment, safeguarding against fraud and unauthorized access. It is however worth mentioning that Al could potentially serve as a conduit<sup>®</sup> for malicious actors to bypass the protective measures of an organization. Lastly, the optimization of smart contracts through Al can revolutionize how contractual terms are executed within the blockchain. By analyzing historical data and predicting outcomes, Al can recommend optimal contract terms, adjusting them as market conditions or investor behaviors change.

Exhibit 4
Artificial Intelligence is poised to streamline the whole alternative assets value chain



Source: Moody's Ratings

#### Small-scale tokenized alternative asset transactions are already underway

Tokenization of alternative assets has attracted some of the largest private asset firms, suggesting smaller peers are likely to follow as competition for investor capital heats up (Exhibit 5). Three major firms – KKR, Hamilton Lane, and Partners Group – have emerged as pioneers in this evolving space. KKR made headlines by tokenizing a portion of its Health Care Strategic Growth Fund on the Avalanche blockchain, a significant step toward making private equity more accessible and liquid. Hamilton Lane followed suit by making its flagship private equity fund available via Securitize, a blockchain platform, showcasing the potential for blockchain technology to streamline investment processes. Lastly, Partners Group has tokenized a private equity fund through digital securities platform ADDX, highlighting blockchain technology's potential to broaden access to investments once only available to a select few. Together, these initiatives highlight a broader trend of integrating blockchain technology into traditional finance.

Exhibit 5

Tokenized private market funds can significantly reduce barriers to entry for investors

	KKR	Hamilton Lane	Partners Group
Asset class	Private equity	Private credit	Private credit
Blockchain network	Avalanche	Polygon	ADDX proprietary blockchain
Network type	Public	Public	Private
Tokenization provider	Securitize	Securitize	ADDX
Traditional fund minimum ticket	\$250,000	\$2,000,000	\$2,000,000
Tokenized fund minimum ticket	\$100,000	\$10,000	\$10,000

Source: Company announcements, Moody's Ratings

#### Tokenization of alternative investments faces several hurdles

Tokenizing investments on a large scale, and achieving broader market adoption of the technology, presents a range of difficulties, including technical issues, regulatory hurdles, and market dynamics.

Regulatory compliance is one main area of difficulty. Because blockchain technology is decentralized and tokenized assets are globally accessible, there is a need for a regulatory framework that harmonizes standards across diverse jurisdictions. At the moment, there are several jurisdictions that have created frameworks for the treatment of tokenized alternative investments (Exhibit 6).

Exhibit 6
Several jurisdictions are already providing guidance on the treatment of tokenized alternative investments

	Legislation /	
Jurisdiction	Regulatory body	Key provisions
Switzerland	DLT Act (2021) / Swiss Financial	Allows tokenized securities to trade on a DLT network with the same legal
	Markets Supervisory Authority	standing as traditional assets. Ledger-based securities can capture the same
		legal and ownership rights as conventional securities.
Luxembourg	Blockchain Laws (2019, 2021, 2023)	Established a regulatory framework allowing the native issuance of
	/ Commission de Surveillance du	dematerialized securities using DLT. Transfers recorded in this manner are
	Secteur Financier	considered as transfers between securities accounts.
United Arab	DLT Foundations Regime (2023) /	Provides a framework for DLT Foundations and DAOs to operate and issue
Emirates	Abu Dhabi Global Market	tokens in a regulated manner.
(ADGM and DIFC	Digital Asset Law (2024) / Dubai	Clarifies digital assets under property law and tokenized securities under the
free zones)	International Financial Centre	Law of Obligations.
Hong Kong	Circulars on tokenized securities	Tokenized securities are no longer viewed as complex in all cases. Retail and
	(2023) / Securities and Futures	professional investors are allowed to invest in tokenized securities following a
	Commission	see-through analysis of the underlying financial instrument.
Singapore	Securities and Futures Act (2001 –	Tokenized securities may fall under the SFA if the tokens qualify as capital
	since amended) / Monetary	markets products. The Monetary Authority of Singapore examines the digital
	Authority of Singapore	tokens to determine if they fall under the SFA.

Source: Moody's Ratings

The technical intricacies of tokenizing alternative investments are significant, starting with the complex task of ensuring that tokenized assets faithfully mirror their real-world counterparts, especially when dealing with tangible assets like real estate and collectibles. The need for infrastructure to facilitate the digital transformation of assets into blockchain-compatible formats demands substantial investment and specialized expertise.

In traditional markets, verifying ownership of assets relies on established procedures, tangible documentation, and meticulous validation by public and private entities. These entities, including patent and trademark offices for intellectual property and registrars like banks or trust companies for publicly traded securities, play pivotal roles in confirming and maintaining ownership records. Custodians play a pivotal role in the secondary markets by safeguarding assets, facilitating seamless transactions, and ensuring compliance with regulatory standards.

In the context of tokenized alternative investments, custodians are responsible not only for the safekeeping of assets but also for the transition between off-chain and on-chain representations of these assets. Their involvement becomes integral to maintaining the security, efficiency, and regulatory compliance of alternative investment assets within evolving blockchain-based financial systems.

A lack of interoperability among different blockchain systems is another hurdle to widespread adoption of tokenization. Interoperability is necessary for the advantages of tokenized alternative assets, such as liquidity and accessibility, to be realized. Fragmentation of secondary markets for tokenized alternative assets could lead to inaccessibility, increased liquidity requirements, and pricing arbitrage, hindering the new markets' efficient operation and growth. Furthermore, the ability of digital finance networks to interact seamlessly with one another and with existing financial systems is essential to enhance the efficiency and security of financial transactions and to reduce systemic risks.

#### **Endnotes**

- 1 See https://www.moodys.com/research/Decentralized-Finance-and-Digital-Assets-Cross-Region-What-is-asset-Sector-Profile--PBC\_1366128
- 2 A type of distributed ledger technology that consists of a list of records, called blocks, that are securely linked together using cryptography.
- <u>3</u> A blockchain that is open to anyone, with no authorization required.
- 4 See https://www.moodys.com/research/Decentralized-Finance-and-Digital-Assets-Cross-Region-What-is-decentralized-Sector-Profile--PBC\_1366134
- 5 See https://www.moodys.com/research/Decentralized-Finance-and-Digital-Assets-Cross-Region-Smart-contracts-key-Sector-In-Depth--PBC\_1359147
- 6 Blockchain interoperability refers to the capacity of different blockchain systems to exchange data, messages, and digital assets
- 7 See: Tokenization of Alternative Investments.

- 8 See https://www.moodys.com/research/Cybersecurity-Cross-Region-Generative-Al-may-increase-cyber-risk-rather-Sector-In-Depth-PBC\_1380691#Summary
- 9 See: Investment Giant KKR Puts Portion of Private Equity Fund on Avalanche Blockchain.
- 10 See: Hamilton Lane and Securitize to Tokenize Funds, Expanding Access to Private Markets for a Broader Set of Investors.
- 11 See: ADDX tokenizes global private equity fund.

© 2024 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 OR OTHERWISE MADE AVAILABLE BY MOODY'S (COLLECTIVELY, "MATERIALS") 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 MATERIALS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S MATERIALS 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 MATERIALS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND MATERIALS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND MATERIALS 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 OR OTHERWISE MAKES AVAILABLE ITS MATERIALS 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 MATERIALS 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 MATERIALS 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. FOR CLARITY, NO INFORMATION CONTAINED HEREIN MAY BE USED TO DEVELOP, IMPROVE, TRAIN OR RETRAIN ANY SOFTWARE PROGRAM OR DATABASE, INCLUDING, BUT NOT LIMITED TO, FOR ANY ARTIFICIAL INTELLIGENCE, MACHINE LEARNING OR NATURAL LANGUAGE PROCESSING SOFTWARE, ALGORITHM, METHODOLOGY AND/OR MODEL.

MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND MATERIALS 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 A 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 Materials.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and 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 and 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. 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 <a href="https://www.moodys.com">www.moodys.com</a> under the heading "Investor Relations — Corporate Governance — Charter Documents - Director and Shareholder Affiliation Policy"

Moody's SF Japan K.K., Moody's Local AR Agente de Calificación de Riesgo S.A., Moody's Local BR Agência de Classificação de Risco LTDA, Moody's Local MX S.A. de C.V, I.C.V., Moody's Local PE Clasificadora de Riesgo S.A., and Moody's Local PA Calificadora de Riesgo S.A. (collectively, the "Moody's Non-NRSRO CRAs") are all indirectly wholly-owned credit rating agency subsidiaries of MCO. None of the Moody's Non-NRSRO CRAs is a Nationally Recognized Statistical Rating Organization.

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 India only: Moody's credit ratings, Assessments, other opinions and Materials are not intended to be and shall not be relied upon or used by any users located in India in relation to securities listed or proposed to be listed on Indian stock exchanges.

Additional terms with respect to Second Party Opinions (as defined in Moody's Investors Service Rating Symbols and Definitions): Please note that a Second Party Opinion ("SPO") is not a "credit rating". The issuance of SPOs is not a regulated activity in many jurisdictions, including Singapore. JAPAN: In Japan, development and provision of SPOs fall under the category of "Ancillary Businesses", not "Credit Rating Business", and are not subject to the regulations applicable to "Credit Rating Business" under the Financial Instruments and Exchange Act of Japan and its relevant regulation. PRC: Any SPO: (1) does not constitute a PRC Green Bond Assessment as defined under any relevant PRC laws or regulations; (2) cannot be included in any registration statement, offering circular, prospectus or any other documents submitted to the PRC regulatory authorities or otherwise used to satisfy any PRC regulatory disclosure requirement; and (3) cannot be used within the PRC for any regulatory purpose or for any other purpose which is not permitted under relevant PRC laws or regulations. For the purposes of this disclaimer, "PRC" refers to the mainland of the People's Republic of China, excluding Hong Kong, Macau and Taiwan.

REPORT NUMBER

1361544

Contacts CLIENT SERVICES

Abhi Srivastava AVP – Analyst, Digital Assets

abhi.srivastava@moodys.com

+1.212.553.8971 Danielle Reed

VP-Senior Research Writer

danielle.reed@moodys.com

e Reed +1.212.553.0348

 Americas
 1-212-553-1653

 Asia Pacific
 852-3551-3077

 Japan
 81-3-5408-4100

 EMEA
 44-20-7772-5454

