

An S&P Global Second Party Opinion (SPO) includes S&P Global Ratings' opinion on whether the documentation of a sustainable finance instrument, framework, or program, or a financing transaction aligns with certain third-party published sustainable finance principles. Certain SPOs may also provide our opinion on how the issuer's most material sustainability factors are addressed by the financing. An SPO provides a point-in-time opinion, reflecting the information provided to us at the time the SPO was created and published, and is not surveilled. We assume no obligation to update or supplement the SPO to reflect any facts or circumstances that may come to our attention in the future. An SPO is not a credit rating, and does not consider credit quality or factor into our credit ratings. See Analytical Approach: Second Party Opinions.

## **Second Party Opinion**

# **Mapletree Logistics Trust's Green Finance** Framework

March 27, 2024

Location: Singapore Sector: Real Estate Investment Trust

## Alignment With Principles

Aligned = ✓

Conceptually aligned = **O** 

Not aligned = X

Green Bond Principles, ICMA, 2021 (with June 2022 Appendix 1)

Green Loan Principles, LMA/LSTA/APLMA, 2023

See Alignment Assessment for more detail.

#### Primary contact

## **Bertrand Jabouley**

Singapore +65-6239-6303 bertrand.jabouley @spglobal.com

Activities representing transition steps in the near-term that avoid emissions lock-in but do not represent long-term low-carbon climate resilient solutions.

Our Shades of Green Analytical Approach >

## Strengths

#### Mapletree Logistics Trust has comprehensive policies and processes to assess new assets' environmental risks.

Mapletree Logistics Trust (MLT) follows the Monetary Authority of Singapore's (MAS) guidelines on environmental risk management for asset managers. The guidelines include various topics to establish an adequate risk management system such as clarification of responsibilities, environmental risk consideration of portfolio construction, risk monitoring and scenario analysis on portfolio, and board oversight.

## Weaknesses

No weakness to report.

#### Areas to watch

MLT's assessment of embodied emissions does not extend beyond the requirements of green certifications. MLT is yet to develop a comprehensive policy on sustainable construction materials. In the sector, understanding of, and methodologies for assessing, embodied emissions are still evolving.

MLT's decarbonization initiatives are developing. MLT has a target on the percentage of green certified gross floor area (GFA) at 80% by 2030; as of March 31, 2023, the percentage was 22.4%. MLT is yet to set a strategy to monitor and reduce scope 3 emissions, especially from goods transportation.

MLT will not report on the share of proceeds used in refinancing assets. Likewise, the framework does not include a maximum lookback period. This limits transparency on the use of proceeds.

## Eligible Green Projects Assessment Summary

Eligible projects under issuer's green finance framework are assessed based on their environmental benefits and risks, using Shades of Green methodology.

Green buildings Light green

New, existing or refurbished green buildings which fulfil national or internationally recognized green building certifications

Renewable energy Dark green

Capital expenditures to install, maintain and operate existing and new renewable energy generation facilities such as rooftop solar panels

Energy efficiency Medium green

Installation, operation, and upgrades projects that aims to reduce energy consumption, adoption of smart technologies and/or systems to optimize energy efficiency and performance in new and existing buildings or to improve efficiency by at least 30%

Sustainable water management Light green

Capital expenditures on water efficient equipment and fittings with water saving features to reduce potable and non-potable water consumption

See Analysis Of Eligible Projects for more detail.

# **Issuer Sustainability Context**

This section provides an analysis of the issuer's sustainability management and the embeddedness of the financing framework within its overall strategy.

## **Company Description**

MLT is a logistics real estate investment trust based in Singapore. MLT listed there in 2005. MLT has assets in countries such as Singapore, Hong Kong, China, Japan, and Australia. It had revenues of Singapore dollars (S\$) 731 million in the fiscal year ended March 31, 2023. Its portfolio consists of 187 properties, 50 of which are in Singapore, 43 in China, 24 in Japan, 21 in South Korea, 14 in Malaysia, 14 in Australia, 10 in Vietnam, nine in Hong Kong, and two in India as of Dec. 31, 2023. The portfolio was worth S\$13.3 billion. Mapletree Logistics Trust Management Ltd. (MLTM), a wholly owned subsidiary of Mapletree Investments Pte. Ltd. (MIPL), manages MLT.

## Material Sustainability Factors

## Climate Transition risk

Increased energy use in buildings has been a major contributor to climate change, representing around a third of global greenhouse gas (GHG) emissions on a final-energy-use basis, according to the International Energy Agency (IEA). This leaves the sector highly susceptible to growing public, political, legal, and regulatory pressure to accelerate climate goals. Building occupiers and operators may face higher energy bills as power prices rise, and higher capital expenditures as upgrades are required to accommodate the energy transition and meet more stringent efficiency standards. This could affect household purchasing power and the competitive strengths of commercial and industrial properties. Incremental climate-related investments can require significant capital outlays but will potentially reduce the risk of obsolescence due to changes in regulation or climate goals. In addition, low-carbon properties may achieve higher cost efficiencies or attract premium rents in the longer term, therefore enhancing their value. In 2021, five government ministries in Singapore launched the Singapore Green Plan 2030, in which the country aims to install 1.5 gigawatt-peak (GWp) of solar power as well as 200 megawatt-hour (MWh) energy storage systems by 2025 (source: <a href="https://www.greenplan.gov.sg/targets/">https://www.greenplan.gov.sg/targets/</a>).

## Physical climate risk

Real estate is exposed to physical climate risks. These risks vary by location, and could include acute risks--such as wildfires, floods, and storms--which are becoming more frequent and severe, as well as chronic risks--such as long-term changes in temperature and precipitation patterns and rising sea levels. Acute and chronic risks could damage properties or affect tenant health and safety. They could also require investments to manage potential effects or relocation of tenants. Aggregate impact is moderate since the type, number, and magnitude of these risks vary by region. But highly exposed regions may be subject to material physical climate risk exposure. Most participants have some insurance coverage, but securing insurance for the most exposed assets could become more difficult, absent adaptation to climate change. Singapore is vulnerable to climate change risks such as rising sea levels, intense rainfall, dry spells, and other extreme weather. The country's sea levels could rise by 1 meter by the end of the century (see "Singapore opens research centre to fight rising sea levels," Reuters, Sept. 7, 2023).

## Customer health and safety

Property asset conditions can affect tenant health and safety, given the hours people spend working indoors. Although the probability of major risks such as fire or failure of a property's structural integrity is low, the impact could be significant; serious injuries are possible, and the risks tend to be more severe in older properties and regions with less stringent safety codes. Long-term leases as well as the diversity of tenants and assets can largely mitigate temporary disruptions in performance, in our view. In Singapore, there is the workplace and safety health act issued by the Ministry of Manpower, which MLT abides to. The requirements of the act include establishing a procedure for safety and health management systems, and conducting mandatory regular audits and reviews on workplace safety and health to ensure continual improvements.

## **Issuer And Context Analysis**

The eligible project categories address both climate transition and physical climate risks, which are the most material sustainability factors for MLT. MLT will allocate most net proceeds to new green buildings, followed by renewable energy and energy efficiency projects. These eligible projects should partly contribute to climate change mitigation through the reduction of operational carbon dioxide emissions, thereby contributing to the transition to a low-carbon economy.

MLT has established its 2030 roadmap, which aligns with MIPL's 2050 carbon neutral pledge and includes quantified objectives for carbon emission reduction. MLT endeavors to reduce GHG emission through installation of solar power (e.g., 100 megawatt-peak [MWp] capacity development by 2030, carbon neutral in scope 1 and 2), leveraging new technologies (e.g., smart energy management system), and promoting energy efficiency within its operations. Achieving green certifications for > 80% of its portfolio (by gross floor area) by 2030 will contribute to decarbonization too. However, MLT is yet to establish a detailed scope 3 inventory. Through its assets, MLT is exposed to trade flows of consumer goods such as consumer staples (21% of revenue), food and beverages (21%), electronics and information technology (13%), and fashion apparel and cosmetics (6%). There is no indication on how MLT could contribute to tenants' decarbonization strategy (e.g., through providing charging stations or electrified equipment such as forklifts).

MLT follows MAS guidelines to identify and manage environmental and climate-related business risks and opportunities. In fiscal 2023, MLT launched a proprietary climate analysis tool to assess systematically the inherent asset level exposure to physical and transition risks under various climate scenarios and time horizons. This is a more granular approach compared with in the past. Still, MLT does not disclose the conclusions and related measures of this analysis.

MLT has adopted ISO 45001 workplace health and safety system to manage its customers' health and safety, which is an important topic for its operations. In addition, there are safety rules and guidelines for tenants (e.g., fit-out manual and handbooks) to educate them on safe and healthy environments considerations. MLT has engagement programs (e.g., annual tenant survey and tenant hotlines) to nurture the relationships with its tenants and address their requests. These initiatives contributed to maintaining a high portfolio occupancy rate at 97% in fiscal 2023.

# **Alignment Assessment**

This section provides an analysis of the framework's alignment to Green Bond and Loan principles.

## Alignment With Principles

Aligned = 🗸

Conceptually aligned = **O** 

Not aligned = X



- ✓ Green Bond Principles, ICMA, 2021 (with June 2022 Appendix 1)
- Green Loan Principles, LMA/LSTA/APLMA, 2023

## Use of proceeds

All the framework's green project categories are shaded in green, and the issuer commits to allocate the net proceeds issued under the framework exclusively to eligible green projects. Please refer to Analysis of Eligible Projects section for more information on our analysis of the environmental benefits of the expected use of proceeds. There is no information on refinancing nor look back period in the framework.

## Process for project evaluation and selection

The framework articulates a process in which MLT's green finance committee, comprising of representatives from the finance, asset and property management teams, will review, select, and approve eligible green projects. There is also an applicable exclusion list, which restricts MLT's investment areas. The green finance committee may engage relevant subject experts from various functional areas to help screen projects. Likewise, internal policies guide the process by which MLT identifies and manages social and environmental risks associated with eligible green projects.

## Management of proceeds

MLT commits to tracking and monitoring the use of net proceeds for each green financial instrument raised under the framework. When an investment ceases to fulfill the eligibility criteria, MLT will replace the project as soon as possible. Likewise, MLT will hold any pending and unallocated proceeds in cash or cash-equivalents, as per its treasury policy.

## Reporting

MLT commits to disclosing its allocation of proceeds and impact of the financed projects to its lender for green loans, and to the wider public for green bonds, in sustainability reports on its website. The allocation and impact reporting will provide a brief description of projects and environmental impact indicators, respectively. Reporting will be at least annual (and upon request from lenders) and, in case of any material changes, until full allocation of the net proceeds. MLT will appoint an external independent auditor to review the allocation of the proceeds each year. MLT will endeavor to align its disclosures with ICMA's Harmonized Framework for Impact Reporting.

# **Analysis Of Eligible Projects**

This section provides details of our analysis of eligible projects, based on their environmental benefits and risks, using the Shades of Green methodology.

MLT expects to allocate the majority of proceeds to new green building projects.

#### Overall Shades of Green assessment

Based on the project category shades of green detailed below, and consideration of environmental ambitions reflected in MLT's green finance framework, we assess the framework light green.

## Light gree

Activities representing transition steps in the near-term that avoid emissions lock-in but do not represent long-term low-carbon climate resilient solutions.

Our <u>Shades of Green</u> <u>Analytical Approach</u> >

## Green project categories

## Green buildings

#### **Assessment**

## Light green

#### Description

Green buildings are new, existing or refurbished buildings which meet regional, national or internationally recognized standards or certifications, which include:

- Green Mark by the Singapore BCA (Building and Construction Authority): Green Mark Gold<sup>PLUS</sup> / Platinum certification or Super Low Energy certification;
- LEED® (Leadership in Energy and Environmental Design) by the U.S. Green Building Council (USGBC): Gold and Platinum;
- EDGE (Excellence in Design for Greater Efficiencies) Advanced and Zero Carbon;
- CASBEE (Comprehensive Assessment System for Built Environment Efficiency) A and S;
- Hong Kong BEAM Gold and Platinum;
- Australia Green Star: 5 and 6 Star;
- BREEAM (Building Research Establishment Environmental Assessment Method) rating Excellent and Outstanding;
- NABERS (National Australian Built Environment Rating System) 5 and 6 star;
- Malaysia GreenRE Gold and Platinum; and
- Any other equivalent Green Building label.

#### **Analytical considerations**

- Green buildings support climate change mitigation by alleviating GHG emissions. However, the construction of green buildings raises the key issue of the energy performance of, and emissions associated with, building materials. Mitigating overall exposure to physical climate risks is also crucial, and new construction may raise complex biodiversity issues (even though this is less the case in logistics hubs, which are usually built in largely developed and industrialized environments).
- MLT will invest in new, existing, and refurbished green buildings with international and national green certifications. Requirements to be certified as green buildings vary significantly, especially in their emphasis on energy performance. For example, while LEED and BREEAM may cover climate resilience, it may be possible to achieve a given certification level without addressing the issue comprehensively due to the use of points-based systems. It focuses on the top two tiers in each certification system (e.g., Green Mark Gold<sup>Plus</sup> and Platinum by Singapore's BCA, Grade S and A in Japan's CASBEE), a clear positive.
- In fiscal 2023, MLT established its 2030 green roadmap, setting various targets (e.g., achieving 80% of green certified GFA). MLT
  obtained 14 new green building certifications in China, Japan, and Malaysia for the first time, quadrupling its certified GFA as a

#### Second Party Opinion: Mapletree Logistics Trust's Green Finance Framework

result. However, it looks still comparatively modest at 22.4%. However, there is potential dependency on fossil-fuel-based air conditioning as well as heating.

- While MLT follows an <u>ESG policy</u>, set by MIPL, to embed environmental, social, and governance (ESG) considerations into its real estate life cycles, it has limited consideration on sustainable construction materials to minimize embodied emissions. In addition, MLT has yet to set any quantitative target to reduce embodied emissions. In the sector, the understanding of, and methodologies for assessing embodied emissions are still evolving.
- MLT has developed its environmental risk identification and management process, aligning with MAS' <u>guidelines</u> on environmental risk management and following recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). MLT conducts physical risk assessment for new assets and reviews its portfolio periodically. MLT strives to mitigate identified risks (e.g., flood gates for assets in flood-prone areas). In fiscal 2023, MLT adopted a climate risk analysis tool to assess the physical and transition risks at the asset level under various scenarios in the short and long term. However, the analysis results have not been disclosed.

## Renewable energy

#### Assessment

## Description



Capital expenditures for installation, maintenance and operations of existing and new renewable energy generation facilities--rooftop solar panels

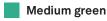
## **Analytical considerations**

- Renewable energy, such as solar, is a key contributor to climate change mitigation, given its low-carbon nature; these projects are shaded dark green. Likewise, renewable energy from solar photovoltaics (PV) is a key element in MLT's decarbonization strategy.
- MLT (and tenants) installed 22.5 MWp capacity of solar panels in fiscal 2023, reaching at total capacity of 36.3 MWp, almost thrice the size in fiscal 2022. MLT installed 4.7 MWp and 0.1 MWp capacity of solar panels in China and India, respectively, for the first time. MLT generated 43.6 gigawatt-hour in electricity in fiscal 2023. It will aim to double the capacity in fiscal 2024 from 17.2 MWp of MLT's owned capacity in fiscal 2023 and increase the total capacity to 100 MWp by 2030.
- MLT will install solar PVs on rooftops, i.e., not on greenfield land, significantly limiting the risk of harming biodiversity. As a result, this topic does not seem to be a key preoccupation for management.
- Life-cycle emissions and waste generation are important considerations in the value chain of renewable power. Still, MLT is yet to monitor life-cycle emissions for solar. Likewise, MLT does not currently have established disposal processes for its solar electricity generation and storage assets, given these installations' relatively young age.

## **Energy efficiency**

## **Assessment**

## Description



Installation, operation, and upgrade of projects that aim to reduce energy consumption, adoption of smart technologies and/or systems to optimize energy efficiency and performance in new and existing buildings or to improve efficiency by at least 30%.

Investment in raising performance of building fittings and equipment such as air-condition chillers, lift systems, light fittings, glass curtain walls, ventilation, and greening technologies that reduce interior heat and contribute to higher energy efficiency.

## **Analytical considerations**

• The energy efficiency improvement target of at least 30% is generally more stringent than local regulations and align with the EU taxonomy. However, the objective remains aspirational, meaning some projects could achieve lower savings.

#### Second Party Opinion: Mapletree Logistics Trust's Green Finance Framework

- The eligible projects include software (e.g., smart technology system) as well as hardware (e.g., more energy efficient air-conditioning and mechanical ventilation). The company compares the level of energy efficiency improvement with historical baselines.
- MLT has already installed systems to monitor energy use for certain buildings. In Singapore, for example, MLT's systems satisfy
  the requirements of the International Organization for Standardization (ISO) 14001, an energy management standard. MLT
  periodically conducts energy audits at the asset level, and monitors energy use at the portfolio level. For example, a project in
  Singapore included replacing existing air conditioning facilities, allowing MLT to reduce energy consumption by 2,400 MWh in the
  last five years.
- Likewise, MLT is replacing heat ventilation and air conditioning (HVAC) systems with more environmentally friendly refrigerants (e.g., R410 or R32) compared with high global warming refrigerants (e.g., R22). A project in Japan, for example, which will be completed in early 2024, could reduce energy consumption by 15%, which is lower than the target set within the framework. This should help address climate transition risks for MLT as well as reduce operational costs of tenants.

#### Sustainable water management

#### **Assessment**

#### Description



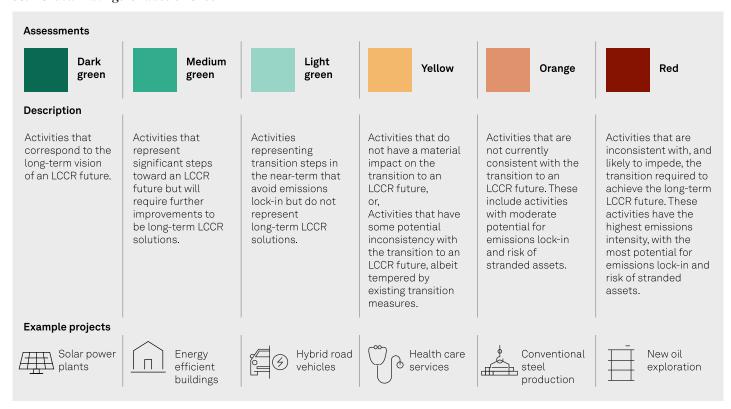
Capital expenditures on water efficient equipment and fittings with water saving features to reduce potable and non-potable water consumption.

Installation of efficient water use equipment, such as sensors in taps, to reduce water usage.

## **Analytical considerations**

- The eligible projects include the upgrade of existing devices and the installation of more efficient equipment, such as sensor taps. Other examples include replacement of cooling towers and flow-rate regulating devices. However, there is no quantitative target for its water usage reduction--a limitation for these projects' benefits.
- MLT's water management policy follows Singapore's Ministry of Sustainability and the Environment's guidelines. It also encourages tenants and third-party service providers to improve their water management. For example, a project in Singapore resulted in 80% reduction in water consumption through upgrades of facilities with pressure valves, which enable recycling of water.
- MLT considers responsible water management as important and identified water-stressed countries (e.g., Singapore and China) with the World Resource Institute. As per its fiscal 2023 sustainability report, MLT also aims to "develop local best practices water standards for all markets" as a part of its fiscal 2024 targets. Beyond this mission statement, MLT confirmed that it set more stringent tender requirements than the regulation in Singapore (i.e., water efficiency labelling at least tick 3, compared with the local requirement at tick 2). MLT's overall water intensity was 0.0864 cubic meter per square feet in fiscal 2023, in line with global peers and 6% lower than a year before.

## S&P Global Ratings' Shades of Green



Note: For us to consider use of proceeds aligned with ICMA Principles for a green project, we require project categories directly funded by the financing to be assigned one of the three green Shades.

LCCR--Low-carbon climate resilient. An LCCR future is a future aligned with the Paris Agreement; where the global average temperature increase is held below 2 degrees Celsius (2 C), with efforts to limit it to 1.5 C, above pre-industrial levels, while building resilience to the adverse impact of climate change and achieving sustainable outcomes across both climate and non-climate environmental objectives. Long term and near term--For the purpose of this analysis, we consider the long term to be beyond the middle of the 21st century and the near term to be within the next decade. Emissions lock-in--Where an activity delays or prevents the transition to low-carbon alternatives by perpetuating assets or processes (often fossil fuel use and its corresponding greenhouse gas emissions) that are not aligned with, or cannot adapt to, an LCCR future. Stranded assets--Assets that have suffered from unanticipated or premature write-downs, devaluations, or conversion to liabilities (as defined by the University of Oxford).

# Mapping To The U.N.'s Sustainable Development Goals

Where the Financing documentation references the Sustainable Development Goals (SDGs), we consider which SDGs it contributes to. We compare the activities funded by the Financing to the International Capital Markets Association (ICMA) SDG mapping and outline the intended linkages within our SPO analysis. Our assessment of SDG mapping does not impact our alignment opinion.

Mapletree Logistics Trust's Green Finance Framework intends to contribute to the following SDGs:

Use of proceeds **SDGs** Green buildings \*11. Sustainable 13. Climate action 9. Industry, innovation and cities and infrastructure communities Renewable energy \*11. Sustainable \*12. Responsible \*7. Affordable and consumption and cities and clean energy communities production Energy efficiency \*7. Affordable and 11. Sustainable 12. Responsible consumption and clean energy cities and communities production Sustainable water management

\*12. Responsible consumption and production

<sup>\*</sup>The eligible project categories link to these SDGs in the ICMA mapping.

## **Related Research**

- Analytical Approach: Second Party Opinions: Use of Proceeds, July 27, 2023
- FAQ: Applying Our Integrated Analytical Approach for Use-of-Proceeds Second Party Opinions, July 27, 2023
- Analytical Approach: Shades of Green Assessments, July 27, 2023
- <u>S&P Global Ratings ESG Materiality Maps</u>, July 20, 2022

# **Analytical Contacts**

Primary contact

**Bertrand Jabouley** 

Singapore +65-6239-6303 bertrand.jabouley

@spglobal.com

Secondary contacts

Tim Axtman

Oslo

+47-941-57-046

tim.axtmann

@spglobal.com

Vanessa Lai

Hong Kong +852-2912-3019

vanessa.lai @spglobal.com Research contributor

Radheya Zope

Pune

CRISIL Global Analytical Center, an S&P affiliate

Second Party Opinion: Mapletree Logistics Trust's Green Finance Framework

Standard & Poor's Financial Services LLC or its affiliates (collectively, S&P) receives compensation for the provision of the Second Party Opinions product (Product). S&P may also receive compensation for rating the transactions covered by the Product or for rating the issuer of the transactions covered by the Product. The purchaser of the Product may be the issuer.

The Product is not a credit rating, and does not consider credit quality or factor into our credit ratings. The Product does not consider, state or imply the likelihood of completion of any projects covered by a given financing, or the completion of a proposed financing. The Product encompasses Use of Proceeds Second Party Opinions and Sustainability-Linked Second Party Opinions. An S&P Global Use of Proceeds Second Party Opinion provides an opinion on an issuer's sustainable finance instrument, program, or framework, and considers the financing in the context of the issuer's most material sustainability factors, the issuer's management of additional sustainability factors relevant to the sustainable financing, and provides an opinion regarding alignment with certain third-party published sustainable finance principles ("Principles"). An S&P Global Ratings Sustainability-Linked Second Party Opinion considers features of a financing transaction and/or financing framework and provides an opinion regarding alignment with relevant Principles. For a list of the Principles addressed by the Product, see the Analytical Approach, available at www.spglobal.com. The Product is a statement of opinion and is neither a verification nor a certification. The Product is a point in time evaluation reflecting the information provided to us at the time that the Product was created and published, and is not surveilled. The Product is not a research report and is not intended as such. S&P's credit ratings, opinions, analyses, rating acknowledgment decisions, any views reflected in the Product and the output of the Product are not investment advice, recommendations regarding credit decisions, recommendations to purchase, hold, or sell any securities or to make any investment decisions, an offer to buy or sell or the solicitation of an offer to buy or sell any security, endorsements of the suitability of any security, endorsements of the accuracy of any data or conclusions provided in the Product, or independent verification of any information relied upon in the credit rating process. The Product and any associated presentations do not take into account any user's financial objectives, financial situation, needs or means, and should not be relied upon by users for making any investment decisions. The output of the Product is not a substitute for a user's independent judgment and expertise. The output of the Product is not professional financial, tax or legal advice, and users should obtain independent, professional advice as it is determined necessary by users.

While S&P has obtained information from sources it believes to be reliable, S&P does not perform an audit and undertakes no duty of due diligence or independent verification of any information it receives.

S&P and any third-party providers, as well as their directors, officers, shareholders, employees, or agents (collectively S&P Parties) do not guarantee the accuracy, completeness, timeliness, or availability of the Product. S&P Parties are not responsible for any errors or omissions (negligent or otherwise), regardless of the cause, for reliance of use of information in the Product, or for the security or maintenance of any information transmitted via the Internet, or for the accuracy of the information in the Product. The Product is provided on an "AS IS" basis. S&P PARTIES MAKE NO REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, INCLUDED BUT NOT LIMITED TO, THE ACCURACY, RESULTS, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE WITH RESPECT TO THE PRODUCT, OR FOR THE SECURITY OF THE WEBSITE FROM WHICH THE PRODUCT IS ACCESSED. S&P Parties have no responsibility to maintain or update the Product or to supply any corrections, updates, or releases in connection therewith. S&P Parties have no liability for the accuracy, timeliness, reliability, performance, continued availability, completeness or delays, omissions, or interruptions in the delivery of the Product.

To the extent permitted by law, in no event shall the S&P Parties be liable to any party for any direct, indirect, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs or losses caused by negligence, loss of data, cost of substitute materials, cost of capital, or claims of any third party) in connection with any use of the Product even if advised of the possibility of such damages.

S&P maintains a separation between commercial and analytic activities. S&P keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of S&P may have information that is not available to other S&P business units. S&P has established policies and procedures to maintain the confidentiality of certain nonpublic information received in connection with each analytical process.

For PRC only: Any "Second Party Opinions" or "assessment" assigned by S&P Global Ratings: (a) does not constitute a credit rating, rating, sustainable financing framework verification, assessment, certification or evaluation as required under any relevant PRC laws or regulations, and (b) cannot be included in any offering memorandum, circular, prospectus, registration documents or any other document submitted to PRC authorities or to otherwise satisfy any PRC regulatory purposes; and (c) is not intended for use within the PRC for any purpose which is not permitted under relevant PRC laws or regulations. For the purpose of this section, "PRC" refers to the mainland of the People's Republic of China, excluding Hong Kong, Macau and Taiwan.

Copyright © 2024 by Standard & Poor's Financial Services LLC. All rights reserved.