



A.M. BEST RATING SERVICES, INC.
RATING DIVISION INTERNAL POLICY

Subject: Dissemination

Class: Credit Rating Determination & Dissemination

Number:

CRPC Policy 5

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Purpose: The purpose of this CRPC Policy is to formalize the dissemination requirements for public and private Credit Rating opinions and other opinions classified as assessments or evaluations. This CRPC Policy applies to A.M. Best Rating Services, Inc. (AMBRIS) and its credit rating agency subsidiaries (collectively, AMB).

Note: *All unpublished rating committee determinations are considered Material Non-Public Information (MNPI) and must be treated with due care and in accordance with Policy C-5. To protect MNPI from unauthorized view, any staff member who becomes aware of an unpublished rating committee determination, in any form (print, verbal, digital), must consider the security of the information. Only authorized personnel may disseminate an unpublished rating committee determination to an authorized recipient (e.g., Rating Analysts can notify company contacts (including specified third parties) or other Rating Analysts/administrative staff members who have a legitimate “need to know”, of an unpublished rating committee determination).*

1. Dissemination – Public Credit Ratings and Public PCAs:

1.1. Primary Method of Disclosure:

All Rating Actions on public Credit Ratings or public Preliminary Credit Assessments (PCAs) shall first be disseminated to the public via posting to the Rating Center page of the AMB website (Rating Center Posting) and will include all required public disclosure requirements. Notification of the Rating Action (see CRPC Policy 4: Rating Notification) to the company/issuer must take place prior to dissemination. Rating Actions should be released within three calendar days from the date of rating committee determination. For any Rating Action release that exceeds three calendar days from the rating committee determination, the reason for the delay must be documented, aggregated and monitored by management.

Note: Subsequent republications of Rating Actions on public Credit Ratings or public PCAs may be completed using ancillary distribution methods. However, these secondary republications may not include the complete inventory of Rating Center Posting disclosures.

1.2. Disclosure Requirements: A list of the public disclosure requirements to be made in, or linked to, the Rating Center Posting of a Rating Action is outlined in the Credit Rating Disclosure Matrix (Disclosure Matrix).



Note: Other public disclosure requirements, not exclusively made with a Rating Action, which are required to be public via the AMB website, are also outlined in the Disclosure Matrix.

1.3. Press Release Scenarios:

A press release must be disseminated in conjunction with the Rating Center Posting of a Rating Action in any of the following circumstances (or as otherwise required) below:

Note: For required press releases associated with Rating Actions on entities or issuers domiciled in Brazil, the press release will be published in English and Portuguese. For required press releases emanating from A.M. Best América Latina, S.A. de C.V. (AMBAL), the press release will be published in English and Spanish.

1.3.1. Rating Withdrawal: The withdrawal of a Credit Rating (excluding private Credit Ratings and public PCAs) on an existing entity, issuer or security requested by the rated entity or as a result of an AMB business decision will require a press release. The press release will be published following the final Rating Update on the existing entity, issuer or security indicating:

- the outcome of the rating committee (i.e., final rating opinion);
- the rating committee justification for the final rating opinion (i.e., reason for withdrawal);
- by whom the Credit Rating withdrawal was initiated by (i.e., AMB or the entity/issuer); and,
- that the Credit Rating will be administratively removed (i.e., no longer followed and moved to the NR category).

Note: The internal process for the administrative removal of an outstanding Credit Rating following a final Rating Update completed due to a rating withdrawal does not require a separate press release.

1.3.2. Appealed Rating Actions (excluding private Credit Ratings, assessments or evaluations) require a press release if the appeal resulted in a change to the original rating committee determination. The press release must indicate that the rating outcome is the result of an accepted appeal. This is required for any of the following:

- Credit Ratings emanating from:
 - A.M. Best Europe Rating Services Ltd. (AMBERS)
 - A.M. Best Europe Rating Services (EU) Ltd. (AMB-EU)
 - A.M. Best Asia Pacific Ltd. (AMBAP)
 - A.M. Best Asia Pacific (Singapore) Pte. Ltd.
- Credit Ratings endorsed into the EU by AMBERS/AMB-EU
- Credit Ratings on entities or issuers domiciled in Brazil

1.3.3. Any Rating Action that includes a methodology deviation;

1.3.4. Any Rating Action issued on a company domiciled in Mexico;

1.3.4.1. For AMBAL, in the case of a rating withdrawal where the issuer/rated entity is asking for the withdrawal due to a downgrade, the press release must be issued, at the latest, by the next business day following the withdrawal with

an indication that this is the final Rating Update and that the withdrawal is due to the downgrade (all other disclosure requirements still apply);

1.3.5. Any Rating Action issued on a company domiciled in Panama which downgrades the Credit Rating. The Spanish language press release must be issued within five business days from the dissemination date of the Rating Action and released through the Panamanian Circuit of Business Wire.

1.3.6. The release of “comments” on a published Credit Rating;

1.4. Press Release Content Requirements:

Where the publication of a press release in conjunction with the Rating Center Posting of a Rating Action is required, or is issued for other reasons, the press release must:

1.4.1. Include a web link to the Rating Center Posting of the Rating Action;

1.4.2. Be developed using the approved press release template based on the employed location of the lead Rating Analyst.

Note: In the case of a business decision to produce a joint office press release that includes Rating Actions emanating from multiple office locations, the office location of the lead Rating Analyst for the lead rating unit within the organizations operating structure will govern which press release template is used. The names of at least one member of each Analytical Team should be identified in the press release.

1.4.3. All AMBAL Rating Action press releases to be issued on a company/issuer domiciled in Mexico shall:

1.4.3.1. be developed using the AMBAL press release template;

1.4.3.2. include in the body of the press release, except where a web link is permitted, the related public disclosure requirements outlined in the Credit Rating Disclosure Matrix;

1.4.3.3. include, if applicable, the contractually obligated information AMB should receive from its client pertaining to any securities rating that is solicited by the client from a third party CRA in the two months prior to the issuance of an AMB Issue Credit Rating;

1.4.3.3.1. The name of the third party CRA that granted the respective rating, as well as the rating it gave to the securities in question.

Note: A joint office press release that includes an AMBAL Rating Action can only supplement and not replace the AMBAL Rating Action press release.

2. Dissemination – Private Credit Ratings and other Private AMB Opinions:

2.1. Requests made to AMB to develop a Credit Rating or other type of assessment or evaluation on a private basis (i.e., a private Credit Rating, private assessment or private evaluation) are not released by AMB to the general public in any medium.

2.2. A private Credit Rating, private Preliminary Credit Assessment (PCA) or other private evaluations or assessments will only be disseminated to the requesting party as part of the rating notification.

2.2.1. The Rating Evaluation Service (RES) and Rating Assessment Service (RAS) are private AMB opinions. The required dissemination requirements for these opinions are located in their respective procedures.

2.2.2. A “private Preliminary Credit Assessment Letter” indicating that AMB has assigned a PCA will accompany the rating notification.

3. Press Release Development and Dissemination Process:

When required, the Analytical Team will work with Public Relations and Quality Assurance in the following manner to develop a press release to accompany the Rating Center posting of the Rating Action.

3.1. The Analytical Team will develop and provide a draft press release to the Public Relations and Quality Assurance Groups.

3.2. Quality Assurance will cross-check the draft press release content against the prepped internal system dissemination (i.e., item(s) to be released to the Rating Center website).

3.3. Public Relations will review/edit and return a clean copy of the press release to the Analytical Team to send to the subject company.

- The Analytical Team must send the release to a person authorized to receive MNPI at the subject company, requesting such person to review the release. The company is not permitted to change any content contained in the draft press release other than edits that:

- remove MNPI;
- correct factual errors (includes grammatical/spelling errors);
- correct factual misperceptions;
- add material factual omissions, excluding MNPI, that were considered by the rating committee.

Note: Other than outlined above, no edits are permitted. This includes changes in text using a synonym of the original word.

3.4. Following the company review, the Analytical Team revises the press release, if appropriate, and forwards to Public Relations.

Note: A record of any company recommended change will be maintained.

3.5. Public Relations provides the final draft release to the Analytical Team;

- If warranted, the Analytical Team will facilitate the translation of the final press release into the appropriate language and provide to Public Relations.
- 3.6.** For Rating Actions emanating from AMBERS/AMB-EU, a member of Rating Operations will confirm with the Analytical Team that the rated entity was informed of the pending Rating Action to be published:
- During its working hours (i.e., the entity's working day); and,
 - At least a full working day before publication of the Rating Action.
- 3.7.** Following the Rating Division release of the Rating Action(s) (i.e., rating Center Posting of the Rating Action), a system generated notification is provided to Public Relations and the Quality Assurance Group;
- 3.8.** Upon notification, Public Relations will:
- Post the press release to the AMB website and Business Wire (all language versions)
 - Post to BestWire for subscriber distribution (English version only)
- 3.9.** Upon notification, Quality Assurance will:
- Compare the website publication of the rating(s) to internal systems.
 - Review that the final press release (including any translation) was posted to the website.
- 4. Administrative Errors During Dissemination:**
- 4.1.** In the event a press release is issued which contains an incorrect Credit Rating, the discovery of such an error will be immediately corrected through the issuance of a corrected press release (in the applicable language) in the same manner as the original release.
- 4.2.** If a Credit Rating is published on the Rating Center page of the AMB Website containing any administrative error(s) pertaining to the Credit Rating, the Rating Center posting will be corrected upon identification of the error.

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