MOODY'S INVESTORS SERVICE

Credit Opinion: Banco Ribeirão Preto S.A. (BRP)

Global Credit Research - 26 Oct 2011

Ribeirao Preto, Brazil

Ratings

Category	Moody's Rating
Outlook	Stable
Bank Deposits	Ba2/NP
NSR Bank Deposits -Dom Curr	A1.br/BR-1
Bank Financial Strength	D
Baseline Credit Assessment	Ba2
Adjusted Baseline Credit Assessment	Ba2

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Key Indicators

Banco Ribeirao Preto S.A. (BRP) (Unconsolidated Financials)[1]

	[2]**6-11**	[2]**12-10**	[2]**12-09**	[2]**12-08**	[3]**12-07**	**Avg.**
Total Assets (BRL billion)	**0.4**	**0.4**	**0.4**	**0.3**	**0.3**	[4]**9.9**
Total Assets (USD billion)	**0.3**	**0.2**	**0.2**	**0.1**	**0.2**	[4]**13.6**
Tangible Common Equity (BRL billion)	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**	[4]**5.5**
Tangible Common Equity (USD billion)	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	[4]**9.0**
Net Interest Margin (%)	**6.5**	**6.6**	**5.3**	**2.8**	**7.2**	[5]**5.7**
PPI / Avg RWA (%)	**4.1**	**4.8**	**3.8**	**2.1**	**5.9**	[6]**3.7**
Net Income / Avg RWA (%)	**2.3**	**2.8**	**1.3**	**1.8**	**3.3**	[6]**2.1**
(Market Funds - Liquid Assets) / Total Assets (%)	**25.9**	**24.8**	**21.8**	**33.2**	**18.8**	[5]**24.9**
Core Deposits / Average Gross Loans (%)	**45.6**	**44.1**	**43.7**	**35.8**	**52.0**	[5]**44.2**
Tier 1 Ratio (%)	**17.0**	**17.2**	**19.0**	**18.4**	**27.2**	[6]**17.9**
Tangible Common Equity / RWA (%)	**18.2**	**18.3**	**20.1**	**19.9**	**27.1**	[6]**19.1**
Cost / Income Ratio (%)	**42.7**	**36.6**	**42.6**	**56.2**	**43.2**	[5]**44.3**
Problem Loans / Gross Loans (%)	**0.2**	**1.4**	**3.0**	**2.0**	**2.9**	[5]**1.9**
Problem Loans / (Equity + Loan Loss Reserves) (%)	**0.7**	**5.5**	**10.7**	**7.4**	**8.8**	[5]**6.6**

Source: Moody's

[1] All ratios are adjusted using Moody's standard adjustments [2] Basel II; LOCAL GAAP [3] Basel I; LOCAL GAAP [4] Compound Annual Growth Rate based on LOCAL GAAP reporting periods [5] LOCAL GAAP reporting periods have been used for average calculation [6] Basel II & LOCAL GAAP reporting periods have been used for average calculation

Opinion

SUMMARY RATING RATIONALE

Moody's assigns a bank financial strength rating (BFSR) of D to Banco Ribeirão Preto S.A. (BRP). The rating translates into a Baseline Credit Assessment of Ba2. The BFSR captures the bank's long-standing regional franchise, which derives from a well-defined footprint in the SME lending sector. The rating is also backed by BRP's conservative leveraging philosophy and by sound financial fundamentals reported over the years.

The embedded regional franchise coupled with good management's expertise of its core markets provide reasonable earnings stream and liquidity stability, a factor that also support asset quality fundamentals. On the other hand, BRP's limited regional scope exposes the bank to a substantial degree of concentration, both of single borrower and industry relative to its core capital and earnings. The secured nature of its loan portfolio to small and mid-sized companies in the interior region of São Paulo State helps to mitigate the concentration risk. BRP's current capitalization level allows some room for further steady but controlled growth.

In addition, the rating also reflects BRP's relative difficult to expand its operations beyond its local limited footprint and its concentrated funding structure, challenges that become more evident as competition increases in its principal markets.

In Moody's view, BRP would receive no systemic support should a crisis occur, given the bank's small participation in the Brazilian retail deposit market. Therefore, Moody's assigns a global local currency (GLC) deposit rating of Ba2 to Banco Ribeirão Preto, which is derived from the Ba2 Baseline Credit Assessment.

All ratings were affirmed on Sept 13, 2010 and all remain unchanged.

Rating Drivers

- Conservative leverage position when compared with domestic peers': a 16.9% BIS ratio in June 2011

- Expertise of its regional market: long-standing client relationships permiting a comprehensive view of local industries' cycles

- Established mid-size franchise as a lender to small and middle market companies in its local footprint: wealthy agribusiness and industrial region attractive relevant competition from universal banks

- Reasonable cost structure supporting a more flexible and quite agile business model

- Reasonable concentration of loan book (by industry and by client), leading to volatility in nonperforming ratios

- Limited product diversification and funding mix compared with peers' (large Brazilian banks that cater the same client base in the region)

- Sustain adequate profitability levels while its approach towards proprietary trading business brings volatility to the bank's earnings profile

Rating Outlook

All the ratings have a stable outlook.

What Could Change the Rating - Up

Positive pressure on BRP's BFSR could derive from management's ability to maintain the bank's profitability at its current level in a low interest-rate environment, together with keeping credit and operating costs low. The diversification of business lines and successful geographical expansion may also benefit its ratings. Improvements in the bank's funding structure, which would involve further diversification, while keeping a tight gap position, would have positive influence on ratings as well.

What Could Change the Rating - Down

Aggressive loan growth beyond BRP's footprint could lead to substantial asset-quality deterioration and provisioning needs, which would hurt capital. Such a situation could hurt the ratings negatively. The bank's inability to fend off competition could also result in margin compression, in a scenario of declining interest rates.

Recent Results and Developments

BRP reported bottom line slim result of BRL 4.3 million for the first six months of 2011 (BRL 3.8 million in same period of 2010 when it recovered from a net loss of BRL1.7 million posted in the same period in 2009). That performance resulted from improved credit dynamics and small gains in its trading positions, another component that adds relative volatility to the bank's results. Despite the stable risk scenario, the bank maintains a conservative approach to credit risk, with its credit book increasing 18% in terms of total volume in LTM June 2011. After peaking 6.3% in June 2009, non-performing loans declined to 3.4% in June 2010 and 1.9% in June 2011, when considering the renegotiation of a loan (with a single client), which was maintained at its risk level, still requiring high provisioning coverage. In June 2011, reserves over total loans reached almost 3%.

Government sponsored credit facilities for certain crops and resources from BNDES (federal largest development bank) together constituted 45% of total third parties funding; for products, that, particularly have low margins, which thus forced the bank to reduce profitability ratios, when compared to previous periods. Deposit base remain relatively stable, including through the negative downturn cycle of 2008 and 2009, although concentration by client also remains a point of challenge (20 largest clients accounted for 144.4% of the bank's equity base in 2Q11) .

Credit risk concentration remains an issue given the very limited size of the bank, with 20 largest credit exposures accounting for 55% of total loans in June 2011 (54% in 2Q10). Mitigation is largely provided by the secured nature of the lending portfolio, as well as an acceptable capital surplus (total BIS ratio of 16.9%, as of June 2011).

DETAILED RATING CONSIDERATIONS

Detailed rating considerations for BRP's currently assigned ratings, as follows:

Bank Financial Strength Rating

Moody's assigns a D BFSR to BRP. Moody's believes the D rating is an appropriate measure of the bank's financial strength, capturing BRP's renowned position in Ribeirão Preto's region, as well as the bank's plans for geographical diversification and expansion of its loan book, particularly in view of medium- to long-term stable economic conditions. This BFSR also reflects the bank's small and limited franchise value.

The difference from the assigned D BFSR to the scorecard outcome of C- is explained by the bank's limited size and scale, an increasingly competitive environment coupled with a declining interest rate, and the possible effects of the expansion strategy on the bank's good fundamentals.

Executive leadership is expected to be able to generate good quality earnings within the bank's new structure and maintain credit and operating costs at low levels. Management's ability to handle intense competition and thin margins is going to determine the extent to which BRP's financial fundamentals may strengthen.

Moody's BFSR scorecard outcome was positively affected by BRP's strong financial indicators, yielding C considering the three-year average ratios (2008-2010) with higher scores for capital adequacy and profitability. Asset quality score suffered declining to B, from A, as a result of the stressed portfolio in 2009 and the contraction of volume volumes since 4Q08. The scorecard's outcome also benefited from Moody's general positive judgment about Brazil's regulatory environment.

Qualitative Factors (70%)

Factor 1: Franchise Value

Trend: Neutral

The overall score of D- for franchise value reflects the bank's limited market scope of the bank in terms of retail deposits within the industry, as well as its modest size and regional focused business activity. BRP had a credit portfolio of R$284.8 million as of June 2011, and a client base comprised of around 325 active mid-sized companies in the region, with annual sales of up to R$150 million, and small and granular portfolio of individuals and real estate finance with over 1,3 thousand customers (or approximately 20% of loans book in 2Q11).

In 2006, business initiatives beyond its traditional geographic coverage, reinforcement of corporate governance and administrative capabilities drove expansion plan and franchise strengthening, in an increasingly competitive environment. This business strategy involved the following: (a) bulking up its sales force; (b) enhancement of its product base, by adding leasing and mortgage loans; (c) the opening of a new branch in São Paulo, a highly competitive region, primarily to reinforce liquidity access and (d) the operation of a more active trading desk, aimed at exploiting market opportunities. Such strategic moves may positively affect earnings generation and diversification, if they succeed. Plans were interrupted in October 2008, and management is currently revisiting this strategy towards business diversification, a key factor to enhance the competitive capacity of this franchise.

Founded in 1995, BRP historically centered its strategic plans on a strong regional knowledge and a conservative risk appetite. This philosophy was implemented, along with a well-defined focus on middle market lending, comprised of tailor-made products to agricultural producers, mainly those in sectors of sugar and alcohol, orange, coffee, soy bean, and cattle-rising. The bank attends a rich agribusiness region of the São Paulo state that accounts for approximately 10% of the state GDP. BRP still lacks the broader geographic coverage of its peers', however, the bank has a defensible market share in its core region, which is the countryside of São Paulo State.

Factor 2: Risk Positioning

Trend: Neutral

BRP obtained an overall score of E for risk positioning, which indicates a transition in terms of corporate governance and a very recent organizational and managerial restructuring to maintain the family-ownership structure. The bank is disciplined in terms of controlling risk, however we believe that as the bank expand out of its regional footprint, risk management needs to be strengthened to avoid it to fall victim of competition. Areas that need to an integrated approach to risk include the technological platform. Risk management has been efficient, but fairly basic when compared with other global players', but in accordance to the Central Bank's requirements. Executives and board members are deeply involved in the process and are aware of key risks.

Operational risk management has been implemented in compliance with regulatory requirements. Nevertheless, information on credit and market positions -- either individual or aggregate exposures -- can be extracted on-demand with relatively short delays. Industry and portfolio reviews take place on a regular basis. The same applies for stress tests, which are performed every month. In case of the latter, the bank has posted no minor or major control issues over the last five years.

Some improvements upon financial reporting transparency have been observed over the last six months, with further disclosure of risk-weighted assets and loan portfolio breakdown information. BRP reports in local GAAP and follows regulatory requirements; it releases adequate financial reports on a quarterly basis, which carries a preliminary auditing note, and these are publicly available on the Central Bank's website.

As a regional mid-size lender, BRP lacks credit granularity, scoring E for credit risk concentration, given the wholesale nature of the portfolio. Around 19% of the credit book is related to consumer-lending operations, which includes a modest portfolio of real estate financing to local individual clients. Portfolio tenor has gradually increased over the last quarters, particularly financed through government facilities as the BNDES. In June 2011, 47% of the portfolio matured over one year. The portfolio is covered by strong collaterals, which help mitigating the intrinsic concentration risk. In terms of industry diversification, the bank's operations are directly and indirectly linked to the agribusiness chain, the region's main economic sustainability, and an important region producing medical supplies.

Moody's continues to see limited funding diversification when BRP is compared with its local peers', which points to BRP's relative reliance on time deposits from local clients and banks. Of note is that this deposit base has proven to be stable during past market turbulences, which is explained by the bank's strong brand in its region of activities. We find relevant concentration within BRP's deposit base. Tightening liquidity conditions worsened in September 2008, have been pressuring funding costs and deposits sustainability, especially on those wholesale reliant banks. Since then, BRP has gradually improved its liquidity through its professional related depositors structure.

The ongoing progress in diversifying and strengthening the bank's funding profile so far has boosted total resources through short to medium-term government-sponsored facilities directed to coffee producers. However, BRP has been centering efforts to add institutional investors to its deposit base, especially from asset managers, given the importance of that industry to the system, already opening limits with important industry players.

Structured in 2007, new real estate-lending platform already accounted for BRL47 million in 2Q11. However the main issue is finding adequate medium to long-term funds to sustain such diversification strategy, and executive leadership does not rule out a partnership in the future to build up synergies in that specific business segment.

The C for Market Risk Appetite indicates relatively small trading activities, but increased risk appetite for proprietary trading activities over the last 18 months. Stress tests indicate that less than 5% of the bank's Tier 1 capital would be at risk due to market risk events (1.5% in 2006). Maintaining a comfortable cash liquidity, management indicated its intention to have a more active trading desk, thus taking greater advantage of market opportunities as they appear. The conservative risk philosophy of the bank should remain unaltered.

Factor 3: Regulatory Environment

Moody's will comment on the Brazilian regulatory environment in a separate report.

Factor 4: Operating Environment

Trend: Neutral

Moody's grades the Brazilian operating environment at D. The D is derived from a score of E for economic stability (measured as nominal GDP volatility over the 20-year period), with a D rating for integrity and corruption. The integrity and corruption index is based on data from the World Bank, which ranks approximately 200 countries worldwide.

The legal system's score of C indicates the average length of time required for the execution of guarantees in Brazil, in the absence of reliable references for mortgage foreclosure.

Quantitative Factors (30%)

Factor 5: Profitability

Trend: Neutral

BRP had a score B+ for profitability considering the 3-year average of 2010.

Since the second half of 2007, performance has been influenced by the MTM adjustments on marketable securities portfolio, a volatile component of the bank's earnings. BRP holds equity position and government bond subject to interest rates volatility. Such move to increment trading activities, in a disciplined approach tough, was expected. Management is bullish about the equity investment held, despite current cycle of market turmoil. As a credit-driven bank, BRP has a recurrent earning flow supported by a prudent liquidity management and strict credit standards.

The bank's profitability profile is explained by BRP's specialized and regional operations. Management shares a good and long-standing relationship with its clients and is familiar with their businesses; hence, the bank has very loyal customers, which keeps credit costs low and sustains the quality of the loan book. Moreover, BRP's small size and lean structure favors a streamlined cost structure.

We does not expect profitability indicators to reduced much compared to 2010 pace, as the bank resumes to the traditional credit market. However, we believe that the competition in BRP's regional market should gradually squeeze margins in the coming quarters. Although trading positions are not relevant to the bank's capital structure, Moody's sees it as a challenging component of the bank's earnings, exposing the limited equity base to the volatility risk.

Factor 6: Liquidity

Trend: Neutral

BRP has a low-leveraged balance sheet, which is mainly funded through time deposits and through government on-lendings from BNDES and FUNCAFE, which are medium to long-term funding programs to coffee producers sponsored by coffee industry in Brazil, managed by the Agriculture Ministry. The bank's small size restricts access to institutional investors, resulting in a funding structure that is mostly based on inter-bank operations and deposit certificates with small and medium-sized companies located in the regional market. The bank's deposit base has proven loyal over the past crisis, and in latest liquidity shortage scenario, BRP's deposits showed positive variation, so less affected than most of local smallcap peers' which are more institutional-funded.

BRP has a D- for liquidity in the scorecard.

Factor 7: Capital Adequacy

Trend: Neutral

BRP has a strong capital base, with a BIS ratio of 16.9% in 2Q11, which although is far above the regulatory minimum of 11%, is been consistently pressured over the years. The bank is the main business of its principal shareholder, the Coselli family; therefore, BRP's comfortable capital position is a result of the shareholders' conservative approach to keep a low-leveraged balance sheet.

Although the ratio is likely to continue floating well-above the regulatory minimum, Moody's notes that it will gradually continue to worsen from the effects of growth in lending activities as management adds leverage to take advantage of a more benign economic environment. Nonetheless, the trend for capital adequacy is neutral at this stage, indicating further room to finance loan growth in the coming years.

Factor 8: Efficiency

Trend: Neutral

BRP's efficiency ratio reflects the bank's lean structure and small size. The skills of the bank on the agribusiness segment and its close client monitoring require a low degree of operational sophistication. Additional costs are foreseen, as management hires professionals, invests in IT systems, and reviews operational processes in order to support its expansion strategy and reinforce competitive power.

The scorecard gives an B for efficiency.

Factor 9: Asset Quality

Trend: Neutral

After peaking levels of 6% by mid-2009, asset quality indicators improved significantly in mid-2010, as the bank was able to renegotiate on credit in the period and also reflects improved credit conditions. The low granularity of the portfolio inputs reasonable volatility in times of stress, an intrinsic risk factor to the bank's profile. Management's proximity and long relationship with clients also adds value to the performance of the portfolio.

Credit overdue more than 15 days as a percentage of total loans stood at 3.2% in June 2011, below the system's 4.9% average and its own higher ratio of 6.5% in June 2010. The adequate capital cushion supports any stress in portfolio's quality. The scorecard shows a B for asset quality.

Global Local Currency Deposit Rating (Joint Default Analysis)

Moody's GLC deposit rating of Ba2 for BRP does not receive any lift from the bank's Baseline Credit Assessment of Ba2. Moody's assesses that no systemic support would be extended to the bank in case an eventual crisis occurs, due to the irrelevant participation of BRP in the retail deposit market in Brazil.

Notching Considerations

Ratings for BRP's junior obligations, if rated by Moody's, would be notched off the global local-currency deposit rating of Ba2, as per Moody's notching conventions.

National Scale Rating

BRP is rated A1.br/BR-1 by Moody's on Brazil's National Scale. The rating is supported by the BRP's deep knowledge of its regional niche market, strong track record of consistent performance, and conservative risk positioning.

Foreign Currency Deposit Rating

Moody's assigns a Ba2 foreign currency deposit rating for BRP.

ABOUT MOODY'S BANK RATINGS

Bank Financial Strength Rating

Moody's Bank Financial Strength Ratings (BFSRs) represent Moody's opinion of a bank's intrinsic safety and soundness and, as such, exclude certain external credit risks and credit support elements that are addressed by Moody's Bank Deposit Ratings. Bank Financial Strength Ratings do not take into account the probability that the bank will receive such external support, nor do they address risks arising from sovereign actions that may interfere with a bank's ability to honor its domestic or foreign currency obligations. Factors considered in the assignment of Bank Financial Strength Ratings include bank-specific elements such as financial fundamentals, franchise value, and business and asset diversification. Although Bank Financial Strength Ratings exclude the external factors specified above, they do take into account other risk factors in the bank's operating environment, including the strength and prospective performance of the economy, as well as the structure and relative fragility of the financial system, and the quality of banking regulation and supervision.

Moody's uses the Baseline Credit Assessment (BCA) to map BFSRs onto the 21-point Aaa-C rating scale and like the BFSR, it reflects a bank stand- alone default risk. Each point on the Aaa-C scale represents a specific probability of default and therefore allows Moody's to use the BCA as an input to Moody's Joint Default Analysis (JDA), described below. The baseline credit assessment reflects what the local currency deposit rating of the bank with the given BFSR would be without any assumed external support from a government or third party.

Global Local Currency Deposit Rating

A deposit rating, as an opinion of relative credit risk, incorporates the Bank Financial Strength Rating as well as Moody's opinion of any external support. Specifically, Moody's Bank Deposit Ratings are opinions of a bank's ability to repay punctually its deposit obligations. As such, Moody's Bank Deposit Ratings are intended to incorporate those aspects of credit risk relevant to the prospective payment performance of rated banks with respect to deposit obligations, and includes: intrinsic financial strength, sovereign transfer risk (in the case of foreign currency deposit ratings), and both implicit and explicit external support elements. Moody's Bank Deposit Ratings do not take into account the benefit of deposit insurance schemes which make payments to depositors, but they do recognize the potential support from schemes that may provide assistance to banks directly.

According to Moody's joint default analysis (JDA) methodology, the global local currency deposit rating of a bank is determined by the incorporation of any external elements of support into the bank's Baseline Credit Assessment. In assigning the local currency deposit rating to a bank, the JDA methodology also factors in the rating of the various potential support providers (parent company, cooperative group, regional or national governments), as well as the degree of dependence that may exist between each one of them and the bank. Moody's assessment of the probability of systemic support (by a national government) is derived from the analysis of the capacity of a government and its central bank to provide support on a system-wide basis. The systemic support indicator is determined for a particular country and serves as an input for all bank ratings in that country. The support indicator can be set at, above or, in rare cases, below the government's local currency bond rating for that country.

National Scale Rating

National scale ratings are intended primarily for use by domestic investors and are not comparable to Moody's globally applicable ratings; rather they address relative credit risk within a given country. A Aaa rating on Moody's National Scale indicates an issuer or issue with the strongest creditworthiness and the lowest likelihood of credit loss relative to other domestic issuers. National Scale Ratings, therefore, rank domestic issuers relative to each other and not relative to absolute default risks. National ratings isolate systemic risks; they do not address loss expectation associated with systemic events that could affect all issuers, even those that receive the highest ratings on the National Scale.

Foreign Currency Deposit Rating

Moody's ratings on foreign currency bank obligations derive from the bank's local currency rating for the same class of obligation. The implementation of JDA for banks can lead to a high local currency ratings for certain banks, which could also produce high foreign currency ratings. Nevertheless, it should be noted that foreign currency deposit ratings are in all cases constrained by the country ceiling for foreign currency bank deposits. This may result in the assignment of a different, and typically lower, rating for the foreign currency deposits relative to the bank's rating for local currency obligations.

Foreign Currency Debt Rating

Foreign currency debt ratings are derived from the bank's local currency debt rating. In a similar way to foreign currency deposit ratings, foreign currency debt obligations may also be constrained by the country ceiling for foreign currency bonds and notes: however, in some cases the ratings on foreign currency debt obligations may be allowed to pierce the foreign currency ceiling. A particular mix of rating factors are taken into consideration in order to assess whether a foreign currency bond rating pierces the country ceiling. They include the issuer's global local currency rating, the foreign currency government bond rating, the country ceiling for bonds and the debt's eligibility to pierce that ceiling.

About Moody's Bank Financial Strength Scorecard

Moody's bank financial strength model (see scorecard below) is a strategic input in the assessment of the financial strength of a bank, used as a key tool by Moody's analysts to ensure consistency of approach across banks and regions. The model output and the individual scores are discussed in rating committees and may be adjusted up or down to reflect conditions specific to each rated entity.

Rating Factors

Banco Ribeirão Preto S.A. (BRP)

Rating Factors [1]	**A**	**B**	**C**	**D**	**E**	**Total Score**	**Trend**
Qualitative Factors (70%)						**D+**	
Factor: Franchise Value						**D-**	**Neutral**
Market Share and Sustainability				**x**			
Geographical Diversification					**x**		
Earnings Stability				**x**			
Earnings Diversification [2]							
Factor: Risk Positioning						**E**	**Neutral**
Corporate Governance [2]					**x**		
- Ownership and Organizational Complexity				x			
- Key Man Risk				x			
- Insider and Related-Party Risks					x		
Controls and Risk Management			**x**				
- Risk Management				x			
- Controls		x					
Financial Reporting Transparency				**x**			
- Global Comparability				x			
- Frequency and Timeliness	x						
- Quality of Financial Information				x			
Credit Risk Concentration					**x**		
- Borrower Concentration					x		
- Industry Concentration				x			
Liquidity Management				**x**			
Market Risk Appetite			**x**				
Factor: Operating Environment						**D**	**Neutral**
Economic Stability					**x**		
Integrity and Corruption				**x**			
Legal System			**x**				
Financial Factors (30%)						**C**	
Factor: Profitability						**B+**	**Neutral**
PPI / Average RWA - Basel II	3.72%						
Net Income / Average RWA - Basel II		1.88%					
Factor: Liquidity						**D-**	**Neutral**
(Mkt funds-Liquid Assets) / Total Assets					26.60%		
Liquidity Management				x			
Factor: Capital Adequacy						**A**	**Neutral**
Tier 1 Ratio - Basel II	18.19%						
Tangible Common Equity / RWA - Basel II	18.00%						
Factor: Efficiency						**B**	**Neutral**
Cost / Income Ratio		45.15%					
Factor: Asset Quality						**B**	**Improving**
Problem Loans / Gross Loans			2.14%				
Problem Loans / (Equity + LLR)	7.87%						
Lowest Combined Score (9%)						**D-**	

Economic Insolvency Override						Neutral	
Aggregate Score						**C-**	
Assigned BFSR						**D**	

[1] - Where dashes are shown for a particular factor (or sub-factor), the score is based on non public information [2] - A blank score under Earnings diversification or Corporate Governance indicates the risk is neutral