MOODY'S INVESTORS SERVICE

Rating Action: Moody's downgrades Italian sub-sovereign ratings following sovereign downgrade

Global Credit Research - 16 Jul 2012

Milan, July 16, 2012 -- Moody's Investors Service has today downgraded the long-term issuer and debt ratings of 23 Italian sub-sovereign entities, including regional and local governments (RLGs) as well as two associated entities. The downgrades were prompted by the weakening of the Italian government's credit profile, as captured by Moody's recent downgrade of Italy's government bond rating to Baa2 from A3. For full details please refer to the Sovereign press release (http://www.moodys.com/research/Moodys-downgrades-Italys-government-bond-rating-to-Baa2-from-A3--PR_250567).

Further to today's action, the outlooks on Italian sub-sovereign ratings remain negative in line with the outlook on the sovereign rating.

RATINGS RATIONALE

The deterioration in Italy's sovereign creditworthiness has affected Italian sub-sovereign entities to varying degrees. For full details of the correlation between sub-sovereign and sovereign credit risk, please refer to Moody's Special Comment published on 15 February (http://www.moodys.com/researchdocumentcontentpage.aspx? docid=PBC_139829).

The centralised architecture of the local public sector in Italy establishes close operational and financial linkages between the national and peripheral governments. Although this is well-established and designed to ensure the stability of the RLG finances, the institutional framework does not grant RLGs sufficient autonomy to withstand a deterioration of the sovereign rating. RLGs are contributing to Italy's fiscal consolidation through fiscal tightening measures imposed by the central government. Lower state resources and stricter budgetary restraints are in turn resulting in increased budgetary rigidity and worsened budgetary performance.

Moody's has today downgraded sub-sovereign issuers that were previously positioned within the A1-Baa1 rating range by two rating notches, mirroring the change in the sovereign rating. Conversely, sub-sovereign ratings that were previously positioned at Baa2 and Baa3 have been lowered by one rating notch to Baa3 and Ba1, respectively, to reflect greater tolerance of lower ratings to sovereign credit deterioration.

Further to today's action, Italian sub-sovereign ratings can continue to be grouped as follows, although the composition of each group has shifted: (1) issuers with ratings above that of the sovereign, (2) issuers rated at the sovereign level, and (3) issuers rated below the sovereign.

A detailed list of the issuers and ratings affected by this rating action is provided further below.

- ENTITIES RATED ABOVE THE SOVEREIGN

Moody's has downgraded the entities in this group by two rating notches. Entities in this group include the Autonomous Province of Bolzano, the Autonomous Province of Trento and its financial company Cassa del Trentino, and the Region of Lombardy. For full detail of the analytical considerations explaining Trento's and Bolzano's credit profile, please refer to our dedicated Issuer Comment, published on 4 April (http://www.moodys.com/researchdocumentcontentpage.aspx?docid=PBC_140694).

Bolzano and Trento were downgraded to A3 from A1, and remain rated two notches above Italy's Baa2 sovereign rating. Key features supporting their higher credit quality include: (i) their statutory independence, which provides a greater degree of financial and legislative autonomy and is expected to continue insulating them from the weakening sovereign environment; (ii) their exceptionally strong fiscal positions and budgetary flexibility, which provides them with the scope to implement large-scale fiscal adjustments; and (iii) their very low exposure to financial market dislocations. At the same time, Cassa del Trentino's A1 rating was downgraded to A3 with a negative outlook, mirroring the action on the Autonomous Province of Trento.

Lombardy was downgraded to Baa1 from A2, and remains rated one notch above Italy's Baa2 sovereign rating. Unlike the two autonomous provinces, Lombardy lacks special constitutional status, and as such it is not insulated from financial exposure to the sovereign. However, it benefits from Italy's largest and most diversified economic base, generating about 20% of national GDP. Furthermore, its large budget and fiscal flexibility, combined with low debt, enable it to implement large-scale fiscal adjustments in response to budgetary restraints.

- ENTITIES RATED AT THE SOVEREIGN LEVEL

Moody's has downgraded the entities in this group to Baa2 -- the same level as the sovereign rating -- from A3. This group comprises seven regions, three cities and one government-related issuer (Finlombarda).

Moody's does not view these entities as having special characteristics that could support ratings higher than that of the sovereign. The tight financial and operational linkages between the state and these RLGs leads to comparable levels of credit risk. Although these entities generally display medium-to-large economic bases, good financials, and low-to-moderate contingent liabilities, they remain dependent on state transfers and central government's decisions affecting their finances. The downgrade of Lombardy's financial company Finlombarda to Baa2 reflects Moody's assessment of the degree of subordination to its sole shareholder, Lombardy, which is rated one notch above at Baa1.

This group also includes the state-backed issuances of the regions of Umbria and Sicily, which are fully serviced by the central government and remain aligned to the sovereign rating.

- ENTITIES RATED BELOW THE SOVEREIGN

Moody's has downgraded entities in this group by one or two notches to reflect their tight budgetary position and high debt, including contingent liabilities, and to preserve the ordinal ranking of their credit quality relative to the sovereign. The group includes six regions and two cities.

The Regions of Abruzzo and Piedmont were downgraded by two notches to Baa3 from Baa1 to reflect their tight budgets, including cash flows, and moderate-to-high debt. The City of Civitavecchia was also downgraded to Baa3 from Baa1 to reflect its weak budgetary position and growing debt.

The Regions of Lazio, Campania, Calabria and Molise were downgraded by one notch to Baa3 from Baa2. These issuers feature low capacity to withstand a deteriorating operating environment and to face budgetary restraints, in light of their tight budgets, high debt and contingent liabilities.

The one-notch downgrade of the City of Naples to Ba1 from Baa3 reflects Moody's assessment of Naples' fragile budgetary position, high debt and exposure to financial risks off-balance sheet. Naples is particularly exposed to the pressure arising from budgetary restraints imposed by the central government, given its high dependence on state resources and the systemic pressure stemming from its weak and demanding socio-economic environment.

WHAT COULD CHANGE THE RATINGS UP/DOWN

The negative outlooks on Italian sub-sovereigns mirror the negative outlook on Italy's sovereign rating and reflect systemic pressure. Italian sub-sovereign ratings are likely to follow the trajectory of Italy's government rating. An imminent deterioration of a given RLG's financial profile and its ability to service its debt obligations would also trigger a downward rating action.

A stabilisation of the outlooks or an upgrade of Italian sub-sovereign ratings will require a stabilisation or upgrade of the sovereign rating, or evidence of a given RLG's capacity to display comparatively stronger credit fundamentals and ability to withstand the deterioration of the operating environment.

RATINGS AFFECTED

- ENTITIES RATED ABOVE THE SOVEREIGN
- Autonomous Province of Bolzano: issuer rating downgraded to A3, with negative outlook, from A1
- Autonomous Province of Trento: issuer rating downgraded to A3, with negative outlook, from A1
- Region of Lombardy: issuer and debt ratings downgraded to Baa1, with negative outlook, from A2

- Cassa del Trentino SpA: issuer and debt ratings downgraded to A3, with negative outlook, from A1
- ENTITIES RATED AT THE SOVEREIGN LEVEL
- Region of Basilicata: issuer rating downgraded to Baa2, with negative outlook, from A3
- Region of Liguria: debt rating downgraded to Baa2, with negative outlook, from A3

- Region of Umbria: issuer and debt ratings downgraded to Baa2, with negative outlook, from A3; senior secured debt rating downgraded to Baa2 from A3

- Region of Veneto: issuer and debt ratings downgraded to Baa2, with negative outlook, from A3
- Region of Puglia: debt rating downgraded to Baa2, with negative outlook, from A3
- Region of Sardinia: debt rating downgraded to Baa2, with negative outlook, from A3

- Region of Sicily: issuer and debt ratings downgraded to Baa2, with negative outlook, from A3; senior secured debt rating downgraded to Baa2 from A3

- City of Milan: issuer and debt ratings downgraded to Baa2, with negative outlook, from A3
- City of Siena: issuer rating downgraded to Baa2, with negative outlook, from A3
- City of Venice: issuer and debt ratings downgraded to Baa2, with negative outlook, from A3
- Finlombarda SpA: issuer rating downgraded to Baa2, with negative outlook, from A3
- ENTITIES RATED BELOW THE SOVEREIGN
- Region of Abruzzo: issuer and debt ratings downgraded to Baa3, with negative outlook, from Baa1
- Region of Calabria: issuer rating downgraded to Baa3, with negative outlook, from Baa2
- Region of Campania: issuer and debt ratings downgraded to Baa3, with negative outlook, from Baa2
- Region of Lazio: debt rating downgraded to Baa3, with negative outlook, from Baa2
- Region of Molise: issuer and debt ratings downgraded to Baa3, with negative outlook, from Baa2
- Region of Piedmont: issuer and debt ratings downgraded to Baa3, with negative outlook, from Baa1
- City of Civitavecchia: issuer and debt ratings downgraded to Baa3, with negative outlook, from Baa1
- City of Naples: debt rating downgraded to Ba1, with negative outlook, from Baa3

RATING METHODOLOGIES USED

The principal methodologies used in rating Italian RLGs were Regional and Local Governments Outside the US published in May 2008, and The Application of Joint Default Analysis to Regional and Local Governments published in December 2008. The principal methodology used in rating Italian GRIs was Government-Related Issuers: Methodology Update published in July 2010. Please see the Credit Policy page on www.moodys.com for a copy of these methodologies.

REGULATORY DISCLOSURES

For ratings issued on a program, series or category/class of debt, this announcement provides relevant regulatory disclosures in relation to each rating of a subsequently issued bond or note of the same series or category/class of debt or pursuant to a program for which the ratings are derived exclusively from existing ratings in accordance with Moody's rating practices. For ratings issued on a support provider, this announcement provides relevant regulatory disclosures in relation to the rating action on the support provider and in relation to each particular rating action for securities that derive their credit ratings from the support provider's credit rating. For provisional ratings, this announcement provides relevant regulatory disclosures in relation to the provisional rating action and in relation to the provisional rating action for securities that derive their credit ratings from the support provider's credit rating. For provisional rating action announcement provides relevant regulatory disclosures in relation to the provisional rating action and in relation announcement provides relevant regulatory disclosures in relation to the provisional rating action and in relation to the provisional rating action and in relation announcement provides relevant regulatory disclosures in relation to the provisional rating action and in relation announcement provides relevant regulatory disclosures in relation to the provisional rating action and in relation and in relation and provides relevant regulatory disclosures in relation to the provisional rating action and provides releva

to a definitive rating that may be assigned subsequent to the final issuance of the debt, in each case where the transaction structure and terms have not changed prior to the assignment of the definitive rating in a manner that would have affected the rating. For further information please see the ratings tab on the issuer/entity page for the respective issuer on www.moodys.com.

The ratings have been disclosed to the rated entities or their designated agent(s) and issued with no amendment resulting from that disclosure.

Information sources used to prepare each of the ratings are the following: parties involved in the ratings, parties not involved in the ratings, public information, confidential and proprietary Moody's Investors Service information, and confidential and proprietary Moody's Analytics information.

Moody's considers the quality of information available on the rated entities, obligations or credits satisfactory for the purposes of issuing these ratings.

Moody's adopts all necessary measures so that the information it uses in assigning the ratings 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 rating process.

Moody's Investors Service may have provided Ancillary or Other Permissible Service(s) to the rated entities or their related third parties within the two years preceding the credit rating action. Please see the special report "Ancillary or other permissible services provided to entities rated by MIS's EU credit rating agencies" on the ratings disclosure page on our website www.moodys.com for further information.

The below contact information is provided for information purposes only. Please see the issuer page on www.moodys.com for Moody's regulatory disclosure of the name of the lead analyst and the office that has issued the credit rating.

Please see the ratings disclosure page on www.moodys.com for general disclosure on potential conflicts of interests.

Please see the ratings disclosure page on www.moodys.com for information on (A) MCO's major shareholders (above 5%) and for (B) further information regarding certain affiliations that may exist between directors of MCO and rated entities as well as (C) the names of entities that hold ratings from MIS that have also publicly reported to the SEC an ownership interest in MCO of more than 5%. A member of the board of directors of this rated entity may also be a member of the board of directors of a shareholder of Moody's Corporation; however, Moody's has not independently verified this matter.

Please see Moody's Rating Symbols and Definitions on the Rating Process page on www.moodys.com for further information on the meaning of each rating category and the definition of default and recovery.

Please see ratings tab on the issuer/entity page on www.moodys.com for the last rating action and the rating history.

The date on which some ratings were first released goes back to a time before Moody's ratings were fully digitized and accurate data may not be available. Consequently, Moody's provides a date that it believes is the most reliable and accurate based on the information that is available to it. Please see the ratings disclosure page on our website www.moodys.com for further information.

Please see www.moodys.com for any updates on changes to the lead rating analyst and to the Moody's legal entity that has issued the rating.

Francesco Soldi Vice President - Senior Analyst Sub-Sovereign Group Moody's Italia S.r.I Corso di Porta Romana 68 Milan 20122 Italy Telephone:+39-02-9148-1100

David Rubinoff

MD - Sub-Sovereigns Sub-Sovereign Group JOURNALISTS: 44 20 7772 5456 SUBSCRIBERS: 44 20 7772 5454

Releasing Office: Moody's Italia S.r.I Corso di Porta Romana 68 Milan 20122 Italy Telephone:+39-02-9148-1100



© 2012 Moody's Investors Service, Inc. and/or its licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ISSUED BY MOODY'S INVESTORS SERVICE, INC. ("MIS") AND ITS AFFILIATES ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND CREDIT RATINGS AND RESEARCH PUBLICATIONS PUBLISHED BY MOODY'S ("MOODY'S PUBLICATIONS") MAY INCLUDE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. 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. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS AND MOODY'S OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. CREDIT RATINGS AND MOODY'S PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS AND PUBLISHES MOODY'S PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

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. 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 rating process. Under no circumstances shall MOODY'S have any liability to any person or entity for (a) any loss or damage in whole or in part caused by, resulting from, or relating to, any error (negligent or otherwise) or other circumstance or contingency within or outside the control of MOODY'S or any of its directors, officers, employees or agents in connection with the procurement, collection, compilation, analysis, interpretation, communication, publication or delivery of any such information, or (b) any direct, indirect, special, consequential, compensatory or incidental damages whatsoever (including without limitation, lost profits), even if MOODY'S is advised in advance of the possibility of such damages, resulting from the use of or inability to use, any such information. The ratings, financial reporting analysis, projections, and other observations, if any, constituting part of the information contained herein are, and must be construed solely as, statements of opinion and not statements of fact or recommendations to purchase, sell or hold any securities. Each user of the information contained herein must make its own study and evaluation of each security it may consider purchasing, holding or selling. NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

MIS, 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 MIS have, prior to assignment of any rating, agreed to pay to MIS for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at <u>www.moodys.com</u> under the heading "Shareholder Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

Any publication into Australia of this document is by MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657, which holds Australian Financial Services License no. 336969. 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.

Notwithstanding the foregoing, credit ratings assigned on and after October 1, 2010 by Moody's Japan K.K. ("MJKK") are MJKK's current opinions of the relative future credit risk of entities, credit commitments, or debt or debt-like securities. In such a case, "MIS" in the foregoing statements shall be deemed to be replaced with "MJKK". MJKK is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO.

This 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. It would be dangerous for retail investors to make any investment decision based on this credit rating. If in doubt you should contact your financial or other professional adviser.