FitchRatings

Credit Bank of Moscow

Key Rating Drivers

Negative Sector Outlook: The revision of the Outlook on Credit Bank of Moscow's (CBM) Issuer Default Ratings (IDRs) to Negative follows the revision of the sector outlook for Russian banks to negative amid the coronavirus outbreak, lower oil prices and the resultant economic downturn.

Some Standalone Resilience: CBM is entering the downturn with comfortable liquidity and a reduced stock of unreserved legacy problems, but with moderate core capital ratios. CBM's financial profile, and therefore ratings, could probably tolerate a short-lived, sharp economic contraction in 2Q20 if this is followed by stabilisation in 2H20. However, an extended period of suppressed economic activity would be more likely to result in a downgrade.

IDR One Notch above VR: CBM's IDRs are one notch above the Viability Rating (VR) to reflect a sizable buffer of qualifying junior debt (QJD), which could protect senior creditors in case of the bank's failure. We expect the QJD/risk-weighted assets (RWAs) ratio (10.2% at end-1Q20) to increase moderately in 2020 due to deleveraging. However, the Negative Outlook on CBM's ratings captures – in addition to the economic downturn – the risk that the buffer may fall below 10% in the medium term and hence no longer meet the one-notch uplift criteria.

Asset Quality to Weaken: We believe CBM's impaired loans will materially increase over the next 12-18 months due to the drop-off in economic activity. Legacy risky assets (net of reserves) were still a significant 0.5x common equity Tier 1 capital (CET1) at end-2019 and these will now be harder to recover.

Large Repos of Limited Credit Risk: A concentrated reverse repo book (48% of assets at end-2019) poses limited credit risk due to investment-grade collateral. It is also largely matched with dedicated direct repos and certain large corporate deposits, mitigating liquidity risk.

Earnings under Pressure: CBM's profitability will deteriorate on higher impairment charges, lower lending growth and weaker fee generation. Positively, in 1Q20, the bank extended some of the above-mentioned large deposits for a long term and at a beneficial interest rate, which will support the bank's margins in the deteriorating environment. CBM's recurring pre-impairment profit in 2019 (4% of average loans) implies moderate capacity to absorb credit losses.

Moderate Core Capital: CET1 and regulatory core Tier 1 ratios of 12% and 9%, respectively, at end-2019 were only moderate relative to net risky assets. The 20% rouble depreciation in 1Q20 could have resulted in a 50bp reduction in the IFRS-based CET1 ratio, but this impact was not recognised in statutory ratios due to regulatory forbearance.

Ample Liquidity: Excluding repo and dedicated funding, CBM's liquidity buffer at end-2019 covered deposits by a solid 43%, while refinancing risk is limited. An additional RUB500 billion (equal to 35% of deposits) could be raised by pledging bonds received under reverse repos. We believe that there is no significant pressure on CBM's funding and liquidity from the downturn.

Rating Sensitivities

Economic Environment: The ratings could be downgraded if the economic contraction turns out to be significantly sharper than currently anticipated, and this leads to marked deterioration in CBM's financial metrics. Conversely, the Negative Outlook may be revised to Stable, if the economic downturn does not result in significant erosion of financial metrics, and if the Russian economy stabilises after a short-lived contraction.

Qualifying Junior Debt: CBM's Long-Term IDR and senior debt rating could be downgraded to the level of the bank's VR if the QJD buffer falls below 10% and Fitch expects it to remain so.

Ratings

Foreign Currency	
Long-Term IDR	BB
Short-Term IDR	B
Local Currency	
Long-Term IDR	BB
Viability Rating	bb-
Support Rating	4
Support Rating Floor	B
National	
National Long-Term Rating	WD(rus)
Sovereign Risk	
Long-Term Foreign-Currency IDR	BBB
Long-Term Local-Currency IDR	BBB
Country Ceiling	BBB

Outlooks

Long-Term Foreign-Currency IDR	Negative
Long-Term Local-Currency IDR	Negative
Sovereign Long-Term Foreign-Currency IDR	Stable
Sovereign Long-Term Local-Currency IDR	Stable

Applicable Criteria

Bank Rating Criteria (February 2020)

Related Research

Fitch Revises 15 Russian Banks' Outlooks to Negative on Coronavirus Disruption and Oil Price Slump (April 2020)

Russian Banks Datawatch 2M20 (April 2020)

Risk-Weight Variation Among EM Banks Impedes Capital Comparisons (December 2020)

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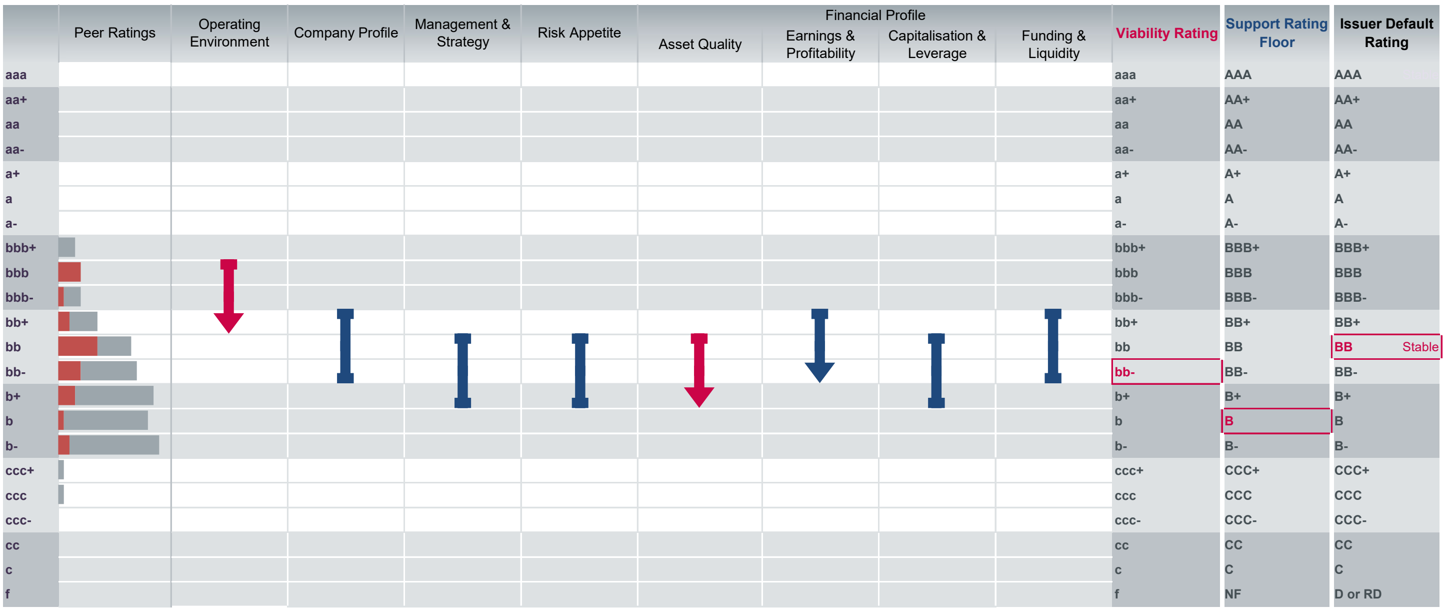
Ratings Navigator



Significant Changes

Weakening Operating Environment

The economic pressure resulting from the spread of COVID-19 and the lower oil price are credit negative for banks in Russia. Fitch's updated baseline is for Russia's GDP to contract by 3.3% in 2020 before returning to 2.5% growth in 2021.

In March 2020, Fitch revised the sector outlook for Russian banks to negative. The drop-off in economic activity and deterioration of borrowers' debt service capacity will translate into weaker asset quality, while higher impairment charges, weaker transactional income and lower loan growth will dampen banks' bottom line performance.

The government support package (equivalent to 2%-3% of GDP, according to the state authorities) will only partially mitigate the hit to economic activity, especially if the current lockdown is extended for a long period. The support measures include subsidised funding programmes for systemically important entities and SMEs, payment holidays, several tax relaxations and additional social security measures.

QJD Buffer Uplift Maintained

The one-notch uplift of the bank's IDRs above the VR reflects a large volume of qualifying junior debt (QJD), which could be used to protect senior creditors in case of the bank's failure.

The IDRs have been removed from Under Criteria Observation (UCO), where they were placed in March 2020 following the publication of Fitch's revised Bank Rating Criteria. The UCO reflected uncertainty about whether CBM would continue to meet the criteria for the one-notch uplift, namely a QJD buffer (including Tier 1 and Tier 2 instruments) clearly and sustainably above 10% of RWAs.

Fitch estimates CBM's QJD buffer was equal to 10.2% of RWAs at end-1Q20. We expect this ratio to increase moderately during the remainder of 2020 as a result of deleveraging, and also note that the ratio is positively correlated with a weaker rouble (and so greater risks to the bank's credit profile), as about two thirds of the QJD buffer comprises US dollar instruments. The expectation that the QJD buffer will be maintained above 10% of RWA in the near-term resulted in April 2020 in the maintenance of the one-notch uplift and the affirmation of the IDRs.

Bar Chart Legend

Vertical bars – VR range of Rating Factor
Bar Colors – Influence on final VR
- Higher influence
- Moderate influence
- Lower influence

Bar Arrows – Rating Factor Outlook
- ⇧ Positive
- ⇩ Negative
- ⇳ Evolving
- ▭ Stable

At the same time, Fitch sees a significant risk that the QJD buffer will fall below 10% of RWAs over the medium term as the bank returns to growth or the rouble recovers some of its value against the US dollar. The Negative Outlook on CBM's IDRs therefore reflects both (i) the risk of a weakening of the bank's financial metrics due to weakening operating environment; and (ii) and the potential for the QJD buffer to fall below 10% of RWAs.

Moderate Amount of Asset Quality Vulnerabilities

CBM's asset quality is supported by a large volume of low-risk reverse repos (48% of total assets at end-2019) and high-quality liquid assets (16%), while most credit risk stems from the bank's loan book (33%). At end-2019, CBM's high-risk assets equalled RUB80bn or 0.5x CET1 capital. These include:

- net impaired (Stage 3 and POCI) loans equal to a moderate 0.1x CET1 capital;
- loan exposures to vulnerable car dealers classified as Stage 1 and Stage 2 (0.3x CET1); and
- equity investment in a loss-making pharmacy chain (0.1x CET1).

A related-party construction company, which was previously also listed as a high-risk exposure by Fitch, repaid most of its debt to the bank in 1Q20. The remaining debt of this borrower equalled a low 2% of CET1 capital.

Retail lending is another source of credit risk, as higher unemployment and forced unpaid leave could impair borrowers' ability to service debt. Positively, CBM has a more limited exposure to unsecured retail (10% of loans, or 0.5x CET1) compared to most domestic peers, while its Moscow-based clientele could have some resilience due to above-average incomes.

Focus on Large Corporates

CBM's focus on larger corporates rather than the more affected SME and retail segments makes the bank potentially less vulnerable to the economic shock. The bank's large loan exposure to oil & gas borrowers (42% of total loans at end-2019) is of moderate risk, in Fitch's view. CBM's oil & gas clients are large state-owned companies and their contractors, which have at least a moderate safety margin against shocks and may benefit from state support. However, credit risks in corporate lending are higher for construction and real estate borrowers (16% of gross loans) and retail trade and services (4%).

Moderate Loss Absorption Capacity

CBM's profitability will deteriorate on higher impairment charges, lower lending growth and weaker fee generation. The bank's recurring pre-impairment profit (4% of average loans in 2019) provides moderate capacity to absorb credit losses. The ratio significantly decreased from a strong 6% in 2016-2018 due to a rise in funding costs, while ROAE dropped to 8% in 2019 from around 20% in 2017-2018. Positively, in 1Q20, the bank extended some of its largest deposits for a long term and at a beneficial interest rate, which will support the bank's margins in the deteriorating environment. CBM's large repo position, which contributed a high 1% of RWAs to the bank's operating profit in 2018-2019, will be another stabilising factor.

Limited Immediate Effect on Regulatory Capital

CBM's core capital is only moderate, with an IFRS-based CET1 of 12% of RWAs at end-2019 and regulatory core Tier 1 capital of 9% of RWAs at end-1Q20. The regulatory ratio has 120bps headroom over the mandatory fully loaded minimums, which we view as only modest relative to potential asset quality problems.

We understand the immediate negative impact on regulatory capital will likely be limited due to regulatory forbearance in the form of deferral of impairment charges, non-recognition of securities losses and use of pre-crisis exchange rates for calculation of RWAs. At the same time, volumes of restructured loans in both retail and corporate books will increase, and if the economic slowdown is longer than currently anticipated, the bank will accumulate sizable unreserved problem loans, undermining its capital position.

The bank's total capital is additionally bolstered by a large junior debt buffer, which in total equalled RUB150 billion, or 10% of the bank's RWAs. In the worst-case scenario this is sufficient to fully cover all of the above-mentioned high-risk exposures.

CBM's Assets, End-2019 (%)

Reverse repo	48
Other liquid assets	16
Corporate loans	28
Retail loans	4
Other	3
Total assets	**100**

Source: Fitch Ratings, Bank

CBM's Gross Loans, End-2019 (%)

Corporate loans:	
Oil and gas	42
Construction & real estate	16
Industrials	8
Car dealers	7
Retail trade & services	4
Other	10
Retai loans:	
Unsecured	10
Secured	3
Total	**100**

Source: Fitch Ratings, Bank

Regulatory Capital Ratios, End-1Q20 (%)

	CBM	Minimum without buffers	Minimum with buffers[a]
Core tier 1	9.2	4.5	8.0
Tier 1	11.7	6.0	9.5
Total	18.2	8.0	11.5

[a] Including fully-loaded capital conservation and systemic importance buffers
Source: Fitch Ratings, Bank

Debt Rating Classes

Rating Level	Rating	Notching
Senior preferred and non-preferred debt	BB	Equalised with IDR
Tier 2 subordinated debt	B+	One notch below VR
Additional Tier 1 notes	B-	Three notches below VR

Source: Fitch Ratings

CBM's senior unsecured debt (including that issued by CBOM Finance Plc) is rated in line with the bank's Long-Term IDRs.

CBM's Tier 2 subordinated debt (issued by CBOM Finance Plc) is rated one notch below the 'bb-' VR. The baseline notching of subordinated debt is two notches, but we notch CBM's ratings once due to the large size of the junior debt buffer, which reduces the risk of the tier 2 debt being fully written off in a failure scenario.

The AT1 perpetual notes (issued by CBOM Finance Plc) are rated at 'B-', three notches lower than the bank's VR. The notching reflects (i) deep subordination of the perpetual notes relative to senior unsecured creditors, resulting in higher loss severity; and (ii) CBM's option to cancel coupon payments at its discretion, resulting in additional non-performance risk.

The write-down trigger on the bank's AT1 securities is the regulatory Core Tier 1 ratio falling below 5.125%. CBM can omit coupons on these securities at its sole discretion. There is no specific trigger which would oblige the bank to omit coupons before hitting the 5.125% Core Tier 1 ratio. However, if the bank's capital ratios fall below minimum levels including buffers (e.g. 8% for Core Tier 1) then the bank would be obliged to submit to the Central Bank of Russia a capital recovery plan, and in Fitch's view there would be at least a moderate risk that any such plan would include the omission of coupons on the AT1 securities.

Sovereign Support Assessment

Support Rating Floor			Value
Typical D-SIB SRF for sovereign's rating level (assuming high propensity)			BBB to BB+
Actual country D-SIB SRF			BB+
Support Rating Floor:			**B**
Support Factors	Positive	Neutral	Negative
Sovereign ability to support system			
Size of banking system relative to economy		✓	
Size of potential problem			✓
Structure of banking system			✓
Liability structure of banking system		✓	
Sovereign financial flexibility (for rating level)	✓		
Sovereign propensity to support system			
Resolution legislation with senior debt bail-in		✓	
Track record of banking sector support		✓	
Government statements of support		✓	
Sovereign propensity to support bank			
Systemic importance			✓
Liability structure of bank		✓	
Ownership		✓	
Specifics of bank failure		✓	

Bar Chart Legend

- Higher influence
- Moderate influence
- Lower influence

CBM's Support Rating of '4' and Support Rating Floor of 'B' reflect Fitch's view the bank may be supported by the Russian authorities, given CBM's moderate systemic importance, as well as the record of state support being provided to three failed systemic banks without losses being imposed on their senior creditors in 2017. However, the significant gap between CBM's Support Rating Floor and the sovereign ratings captures CBM's only moderate systemic importance as reflected by its low market shares (2% of sector deposits at end-2019).

Summary Financials and Key Ratios

	31 Dec 2019 Year End USDm Audited - Unqualified	31 Dec 2019 Year End RUBm Audited - Unqualified	31 Dec 2018 Year End RUBm Audited - Unqualified	31 Dec 2017 Year End RUBm Audited - Unqualified	31 Dec 2016 Year End RUBm Audited - Unqualified	31 Dec 2015 Year End RUBm Audited - Unqualified
Summary Income Statement						
Net interest and dividend income	731	45,283.0	48,415.0	45,280.0	40,299.0	29,288.5
Net fees and commissions	186	11,534.0	12,346.0	12,508.0	11,147.0	7,624.9
Other operating income	-205	-12,695.0	3,824.0	3,570.0	7,291.0	2,313.0
Total operating income	713	44,122.0	64,585.0	61,358.0	58,737.0	39,226.4
Operating costs	315	19,503.0	18,781.0	16,756.0	14,543.0	10,022.4
Pre-impairment operating profit	398	24,619.0	45,804.0	44,602.0	44,194.0	29,204.0
Loan and other impairment charges	148	9,164.0	10,828.0	18,733.0	30,054.0	26,944.9
Operating profit	250	15,455.0	34,976.0	25,869.0	14,140.0	2,259.1
Other non-operating items (net)	-6	-342.0	93.0	948.0	-405.0	-314.6
Tax	51	3,156.0	7,845.0	6,114.0	2,861.0	435.0
Net Income	193	11,957.0	27,224.0	20,703.0	10,874.0	1,509.5
Other comprehensive income	48	2,961.0	-3,274.0	-202.0	188.0	1,150.8
Fitch comprehensive income	241	14,918.0	23,950.0	20,501.0	11,062.0	2,660.3
Summary Balance Sheet						
Assets						
Gross loans	13,394	829,195.0	740,131.0	818,816.0	666,738.0	629,938.9
- of which impaired	633	39,173.0	28,878.0	19,761.0	15,269.0	32,438.6
Loan loss allowances	655	40,540.0	31,086.0	50,140.0	40,203.0	36,873.6
Net loans	12,740	788,655.0	709,045.0	768,676.0	626,535.0	593,065.3
Interbank	506	31,301.0	34,472.0	57,446.0	109,069.0	80,961.1
Derivatives	125	7,759.0	4,636.0	44,296.0	2,549.0	926.2
Other securities and earning assets	23,588	1,460,247.0	1,295,554.0	903,226.0	756,657.0	451,969.1
Total earning assets	36,959	2,287,962.0	2,043,707.0	1,773,644.0	1,494,810.0	1,126,921.7
Cash and due from banks	1,929	119,423.0	87,823.0	99,916.0	48,818.0	50,734.8
Other assets	260	16,112.0	14,397.0	14,631.0	24,341.0	30,544.1
Total assets	39,148	2,423,497.0	2,145,927.0	1,888,191.0	1,567,969.0	1,208,200.6
Liabilities						
Customer deposits	20,971	1,298,243.0	1,198,539.0	875,782.0	671,223.0	876,806.9
Interbank and other short-term funding	10,951	677,936.0	587,986.0	665,961.0	629,316.0	88,258.9
Other long-term funding	2,723	168,549.0	143,885.0	156,122.0	154,954.0	143,485.7
Trading liabilities and derivatives	160	9,874.0	6,329.0	1,551.0	1,081.0	782.8
Total funding	35,472	2,195,894.0	1,936,739.0	1,699,416.0	1,456,574.0	1,109,334.3
Other liabilities	277	17,171.0	18,015.0	11,186.0	7,994.0	6,527.8
Preference shares and hybrid capital	612	37,871.0	46,691.0	40,320.0	0.0	n.a.
Total equity	2,787	172,561.0	144,482.0	137,269.0	103,401.0	92,338.5
Total liabilities and equity	39,148	2,423,497.0	2,145,927.0	1,888,191.0	1,567,969.0	1,208,200.6
Exchange rate		USD1 = RUB61.9057	USD1 = RUB69.5218	USD1 = RUB57.6002	USD1 = RUB60.6569	USD1 = RUB72.8827

Summary Financials and Key Ratios

	31 Dec 2019	31 Dec 2018	31 Dec 2017	31 Dec 2016	31 Dec 2015
Ratios (annualised as appropriate)					
Profitability					
Operating profit/risk-weighted assets	1.1	2.6	2.2	1.3	0.2
Net interest income/average earning assets	2.2	2.6	3.0	3.4	3.8
Non-interest expense/gross revenue	49.4	29.1	27.3	24.8	25.6
Net Income/average equity	7.8	19.9	17.8	11.1	2.1
Asset Quality					
Impaired loans ratio	4.7	3.9	2.4	2.3	5.2
Stage 2 loans ratio	2.7	5.9	n.a.	n.a.	n.a.
Growth in gross loans	12.0	-9.6	22.8	5.8	59.8
Loan loss allowances/impaired loans	103.5	107.7	253.7	263.3	113.7
Loan impairment charges/average gross loans	1.1	1.1	2.5	4.7	5.4
Capitalisation					
Common equity Tier 1 ratio	11.9	10.7	11.6	9.4	9.2
Fitch Core Capital ratio	12.0	10.6	11.7	9.5	9.3
Tangible common equity/tangible assets	7.1	6.7	7.3	6.6	7.6
Risk-weighted assets/total assets	59.1	63.3	62.2	69.2	81.6
Net impaired loans/Common equity Tier 1	-0.8	-1.5	-22.4	-24.5	-4.9
Net impaired loans/Fitch Core Capital	-0.8	-1.5	-22.2	-24.2	-4.8
Funding and Liquidity					
Loans/customer deposits	63.9	61.8	93.5	99.3	71.8
Customer deposits/funding	58.1	60.6	50.4	46.1	79.1

Environmental, Social and Governance Considerations

Credit-Relevant ESG Derivation

Credit Bank of Moscow has 2 ESG rating drivers and 3 ESG potential rating drivers				Overall ESG Scale
Credit Bank of Moscow has exposure to board independence and effectiveness; ownership concentration; protection of creditor/stakeholder rights; legal /compliance risks; business continuity; key person risk; related party transactions which, in combination with other factors, impacts the rating.	key driver	0	issues	5
Credit Bank of Moscow has exposure to organizational structure; appropriateness relative to business model; opacity; intra-group dynamics; ownership which, in combination with other factors, impacts the rating.	driver	2	issues	4
Credit Bank of Moscow has exposure to compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection (data security) but this has very low impact on the rating.	potential driver	3	issues	3
Credit Bank of Moscow has exposure to operational implementation of strategy but this has very low impact on the rating.	not a rating driver	4	issues	2
Credit Bank of Moscow has exposure to quality and frequency of financial reporting and auditing processes but this has very low impact on the rating.		5	issues	1

Environmental (E)

General Issues	E Score	Sector-Specific Issues	Reference	E Scale
GHG Emissions & Air Quality	1	n.a.	n.a.	5
Energy Management	1	n.a.	n.a.	4
Water & Wastewater Management	1	n.a.	n.a.	3
Waste & Hazardous Materials Management; Ecological Impacts	1	n.a.	n.a.	2
Exposure to Environmental Impacts	2	Impact of extreme weather events on assets and/or operations and corresponding risk appetite & management; catastrophe risk; credit concentrations	Company Profile; Management & Strategy; Risk Appetite; Asset Quality	1

Social (S)

General Issues	S Score	Sector-Specific Issues	Reference	S Scale
Human Rights, Community Relations, Access & Affordability	2	Services for underbanked and underserved communities: SME and community development programs; financial literacy programs	Company Profile; Management & Strategy; Risk Appetite	5
Customer Welfare - Fair Messaging, Privacy & Data Security	3	Compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection (data security)	Operating Environment; Company Profile; Management & Strategy; Risk Appetite	4
Labor Relations & Practices	2	Impact of labor negotiations, including board/employee compensation and composition	Company Profile; Management & Strategy	3
Employee Wellbeing	1	n.a.	n.a.	2
Exposure to Social Impacts	2	Shift in social or consumer preferences as a result of an institution's social positions, or social and/or political disapproval of core banking practices	Company Profile; Financial Profile	1

Governance (G)

General Issues	G Score	Sector-Specific Issues	Reference	G Scale
Management Strategy	3	Operational implementation of strategy	Management & Strategy	5
Governance Structure	4	Board independence and effectiveness; ownership concentration; protection of creditor/stakeholder rights; legal /compliance risks; business continuity; key person risk; related party transactions	Management & Strategy; Earnings & Profitability; Capitalisation & Leverage	4
Group Structure	4	Organizational structure; appropriateness relative to business model; opacity; intra-group dynamics; ownership	Company Profile	3
Financial Transparency	3	Quality and frequency of financial reporting and auditing processes	Management & Strategy	2
				1

How to Read This Page
ESG scores range from 1 to 5 based on a 15-level color gradation. Red (5) is most relevant and green (1) is least relevant.

The Environmental (E), Social (S) and Governance (G) tables break out the individual components of the scale. The right-hand box shows the aggregate E, S, or G score. General Issues are relevant across all markets with Sector-Specific Issues unique to a particular industry group. Scores are assigned to each sector-specific issue. These scores signify the credit-relevance of the sector-specific issues to the issuing entity's overall credit rating. The Reference box highlights the factor(s) within which the corresponding ESG issues are captured in Fitch's credit analysis.

The Credit-Relevant ESG Derivation table shows the overall ESG score. This score signifies the credit relevance of combined E, S and G issues to the entity's credit rating. The three columns to the left of the overall ESG score summarize the issuing entity's sub-component ESG scores. The box on the far left identifies some of the main ESG issues that are drivers or potential drivers of the issuing entity's credit rating (corresponding with scores of 3, 4 or 5) and provides a brief explanation for the score.

Classification of ESG issues has been developed from Fitch's sector ratings criteria. The General Issues and Sector-Specific Issues draw on the classification standards published by the United Nations Priniciples for Responsible Investing (PRI) and the Sustainability Accounting Standards Board(SASB).

Sector references in the scale definitions below refer to Sector as displayed in the Sector Details box on page 1 of the navigator.

CREDIT-RELEVANT ESG SCALE

How relevant are E, S and G issues to the overall credit rating?

5	Highly relevant, a key rating driver that has a significant impact on the rating on an individual basis. Equivalent to "higher" relative importance within Navigator.
4	Relevant to rating, not a key rating driver but has an impact on the rating in combination with other factors. Equivalent to "moderate" relative importance within Navigator.
3	Minimally relevant to rating, either very low impact or actively managed in a way that results in no impact on the entity rating. Equivalent to "lower" relative importance within Navigator.
2	Irrelevant to the entity rating but relevant to the sector.
1	Irrelevant to the entity rating and irrelevant to the sector.

CBM has ESG Relevance Scores of '4' for Governance Structure and Group Structure, which reflects a significant level of relationship-based operations, a lack of transparency with respect to ownership structure and significant double leverage at the level of the bank's holding company.

Except for the matters discussed above, the highest level of ESG credit relevance, if present, is a score of 3. This means ESG issues are credit-neutral or have only a minimal credit impact on the entity, either due to their nature or to the way in which they are being managed by the entity.

Editor- use the [FR Solicitations] function on the FITCH TEMPLATES tab to insert text here