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CREDIT OPINION
21 July 2023

Update

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Hamburg Commercial Bank AG

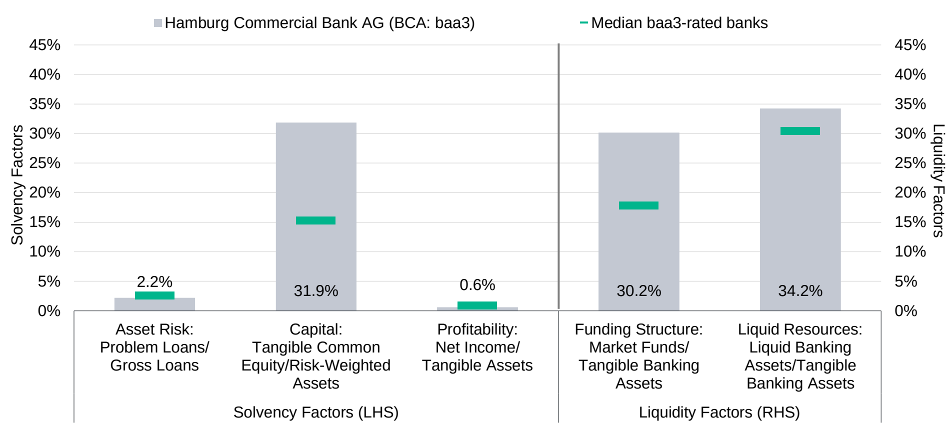
Update to credit analysis

Summary

Hamburg Commercial Bank AG's (HCOB) A3 deposit and senior unsecured debt ratings reflect the bank's baa3 Baseline Credit Assessment (BCA) and Adjusted BCA, and the application of our Advanced Loss Given Failure (LGF) analysis, which incorporates the relative loss severity of a liability class, and results in three notches of rating uplift for deposits and senior unsecured debt. HCOB's ratings do not benefit from government support uplift because of its small size in the context of the German banking sector.

HCOB's baa3 BCA reflects the bank's sustainably strengthened solvency profile; and its improved profitability and strong capital levels, which provide a substantial buffer against potential losses from its still largely asset-based finance risk exposures. The achieved resilience is an important consideration in the context of its quasi-monoline business model. The BCA also incorporates HCOB's stable funding and solid liquidity, which levels have remained largely unchanged since the bank's privatisation in 2018. HCOB's asset-risk profile remains characterised by the bank's focus on higher-risk loans, predominantly asset-based lending activities, in particular commercial real estate (CRE) and shipping finance, although the bank has increased and diversified into corporate lending activities.

Exhibit 1
Rating Scorecard - Key financial ratios



Source: Moody's Investors Service

RATINGS

Hamburg Commercial Bank AG

Domicile	Hamburg, Germany
Long Term CRR	A3
Type	LT Counterparty Risk Rating - Fgn Curr
Outlook	Not Assigned
Long Term Debt	A3
Type	Senior Unsecured - Dom Curr
Outlook	Stable
Long Term Deposit	A3
Type	LT Bank Deposits - Fgn Curr
Outlook	Stable

Please see the ratings section at the end of this report for more information. The ratings and outlook shown reflect information as of the publication date.

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Credit strengths

» HCOB benefits from its capitalisation, which we expect to remain strong.

» The bank has sustainably increased its profitability, providing a buffer for a potential increase in risk costs.

» HCOB maintains solid liquidity buffers.

Credit challenges

» The bank's asset-risk concentrations remain high because it is focused on high-margin asset-based lending, despite diversification into corporate lending.

» HCOB's funding profile relies on a diversified set of market funding sources.

Outlook

The stable outlook reflects our expectation that HCOB will be able to protect its achieved solvency, in particular that neither its capitalisation nor its profitability will drop below our expectation. Furthermore, the stable outlook reflects our assumption that the outstanding volumes of junior senior unsecured and subordinated debt instruments do not significantly drop below indicated levels in relation to the bank's balance sheet.

Factors that could lead to an upgrade

» HCOB's rating could be upgraded in case of an upgrade of its BCA, which could result from a significant risk and earnings diversification from its current asset-based finance business model.

» The bank's junior senior unsecured debt and subordinated debt ratings could be upgraded in case of significant additional volumes of capital instruments (Tier 2 and Additional Tier 1) being issued.

Factors that could lead to a downgrade

» HCOB's ratings could be downgraded if the bank's BCA is downgraded or if its liability structure leads to a less favourable outcome under our Advanced LGF analysis, which could for example result from a significant reduction in the volume of debt instruments subordinated to senior unsecured liabilities.

» A downgrade of HCOB's BCA could result from a weakening of the bank's combined solvency profile, in particular if this were to be caused by a significant reduction in the bank's achieved profitability or a less conservative capital management, beyond the bank's current targets.

Key indicators

Exhibit 2

Hamburg Commercial Bank AG (Consolidated Financials) [1]

	12-22[2]	12-21[2]	12-20[2]	12-19[2]	12-18[2]	CAGR/Avg.[3]
Total Assets (EUR Billion)	31.5	29.9	32.6	46.7	53.6	(12.4)[4]
Total Assets (USD Billion)	33.7	33.9	39.9	52.4	61.2	(13.9)[4]
Tangible Common Equity (EUR Billion)	4.9	4.4	4.1	3.9	3.9	6.2[4]
Tangible Common Equity (USD Billion)	5.2	5.0	5.0	4.4	4.4	4.4[4]
Problem Loans / Gross Loans (%)	2.0	2.2	2.4	2.1	2.9	2.3[5]
Tangible Common Equity / Risk Weighted Assets (%)	31.9	31.5	26.2	18.5	17.5	25.1[6]
Problem Loans / (Tangible Common Equity + Loan Loss Reserve) (%)	7.3	9.1	12.1	14.2	20.3	12.6[5]
Net Interest Margin (%)	2.1	1.7	1.4	1.0	1.0	1.4[5]
PPI / Average RWA (%)	2.0	1.7	1.0	0.8	0.3	1.2[6]
Net Income / Tangible Assets (%)	1.2	0.8	-0.3	0.2	-0.8	0.2[5]
Cost / Income Ratio (%)	53.7	59.6	67.4	71.6	89.0	68.3[5]
Market Funds / Tangible Banking Assets (%)	30.2	35.7	40.6	31.1	31.7	33.9[5]
Liquid Banking Assets / Tangible Banking Assets (%)	34.2	28.7	25.4	27.7	33.9	30.0[5]
Gross Loans / Due to Customers (%)	149.4	185.4	203.9	147.9	116.8	160.7[5]

[1] All figures and ratios are adjusted using Moody's standard adjustments. [2] Basel III - fully loaded or transitional phase-in; IFRS. [3] May include rounding differences because of the scale of reported amounts. [4] Compound annual growth rate (%) based on the periods for the latest accounting regime. [5] Simple average of periods for the latest accounting regime. [6] Simple average of Basel III periods.

Sources: Moody's Investors Service and company filings

Profile

Based in Northern Germany, Hamburg Commercial Bank AG (HCOB) is a regional commercial bank with a focus on asset-based lending for CRE, shipping, project finance and corporate lending, with reported total assets of €31.8 billion as of year-end 2022. The bank re-branded to HCOB from HSH Nordbank AG in early 2019 and aims to operate as an efficient commercial bank focused on domestic clients, although it has an appetite for international expansion particularly into the US, but also into select European countries.

HCOB is the first former Landesbank that transformed into a privately owned bank. Since November 2018, the bank has been owned by a consortium of private equity funds led by Cerberus Capital Management L.P. and J.C. Flowers & Co.

As of the year-end 2022, HCOB had 868 full-time equivalent (FTE) employees, primarily in its headquarters in Hamburg and its branch in Kiel. HCOB has additional domestic branch offices in Berlin, Frankfurt, Düsseldorf, Munich and Stuttgart, and three offices abroad in Athens, London and Luxembourg.

Weighted macro profile of Strong

Although HCOB is focused on the German market, the bank's assigned Strong weighted macro profile is set one notch below the Strong (+) macro profile of Germany, reflecting the issuer's international activities in countries with less-benign operating environments, including its shipping exposures, which are sensitive to global trade and macroeconomic conditions.

Detailed credit considerations

Asset-risk profile has improved, but remains vulnerable to tail risks stemming from sector concentrations

We assign a ba1 Asset Risk score to HCOB, four notches below the a3 initial score, reflecting significant concentration risks, which in an adverse scenario could lead to an accelerated increase in problem loans, beyond the reported nonperforming loan ratio of 2%-3% that the bank achieved despite challenges from the coronavirus pandemic.

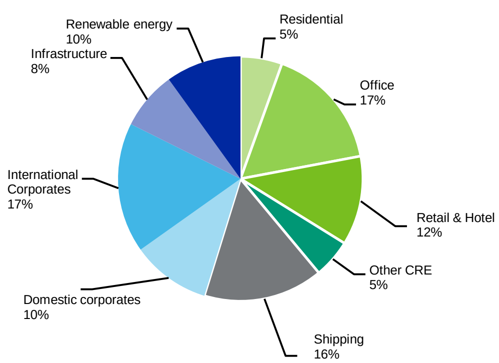
The pandemic has been the first test for HCOB's risk management after it followed a more cautious lending approach in the past few years. The bank's concentration in higher-risk CRE and ship lending remains at a multiple of its capital despite a significant reduction in relative exposures since the privatisation in 2018, and exposes it to cyclicality, with HCOB having a relatively short track record of sound performance in ship lending.

HCOB's underwriting shifted its focus more to corporate lending in 2022. In 2022, HCOB stabilised its new business at €5.6 billion (marginally up from €5.4 billion in 2021), with the corporate segment the only seeing a growth in gross lending, up at €1.7 billion from €1.2 billion. CRE remained stable at €1.6 billion and project finance (including renewable energy financings and digital infrastructure projects) at €0.7 billion, while shipping declined to €1.6 billion from €1.9 billion.

Exhibit 3

HCOB's loan book concentrated in asset-based exposures, with shipping and CRE lending segments particularly exposed to adverse economic scenarios

Total exposure of €22.2 billion (as of year-end 2022 by segment)

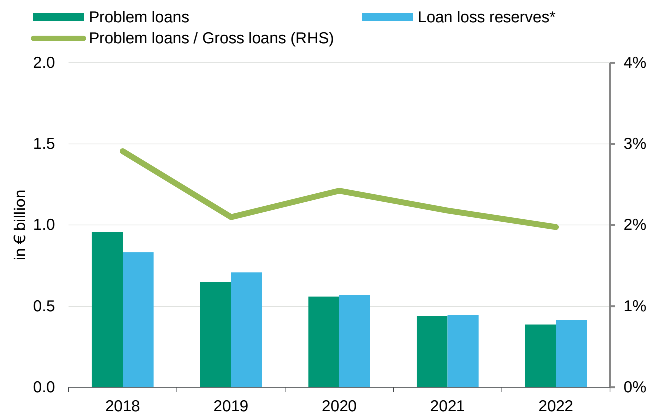


Source: Company data

Exhibit 4

HCOB's reduced level of problem loans is covered by loan loss reserves

Volume in € billions



*Loan loss reserves excluding the compensation item under the former guarantee.

Sources: Moody's Investors Service and company's reports

In 2022, the bank's problem loan ratio decreased to 2.0% from 2.2% as of year-end 2021. As year-end 2022, HCOB had €387 million of problem loans, down from €440 million as of December 2021, whereas gross customer loans decreased slightly to €19.4 billion. As of year-end, HCOB decreased its loan loss reserves to €414 million (December 2021: €446 million), or 2.1% of gross customer loans, still providing an ample buffer against potential increases in problem loans, for example, as a result of the current economic downswing.

Capitalisation is likely to remain strong, providing a substantial buffer

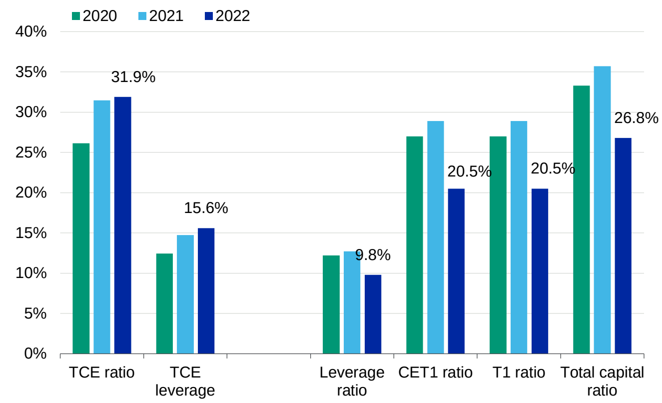
We expect HCOB to maintain substantial core capital buffers, as reflected in the assigned aa3 Capital score, one notch below the aa2 initial score derived from the tangible common equity (TCE) ratio of 31.9% (year-end 2021: 31.5%). The assigned score reflects both HCOB's very strong absolute capitalisation, as reflected in its TCE leverage ratio of 15.6%, and the bank's plans to normalise capital levels in 2023, although to still-strong levels, with the management targeting a Common Equity Tier 1 (CET1) capital ratio of at least 17%.

As of year-end 2022, HCOB reported a CET1 ratio of 20.5% (2021: 28.9%) and its regulatory Tier 1 leverage ratio was also a very strong of 9.8% (2021: 12.7%). The deterioration in regulatory capital ratios was primarily driven by a €1.5 billion dividend paid to its shareholders in April 2023, representing a 7.8% reduction in CET1, and to a much lesser degree by the impact of a model change away from the advanced internal ratings-based approach. The impact of the deterioration will filter through to our TCE ratios, which should converge towards regulatory core capital ratios in 2023.

The introduction of a countercyclical buffer of 0.75% of domestic risk-weighted assets (RWA) and an additional 2.0% buffer specific to RWA from domestic loans backed by residential properties from February 2023, as announced by the banking supervisory authority BaFin for German banks in January 2022, will have a limited impact on HCOB's significant distance to the regulatory minimum levels.

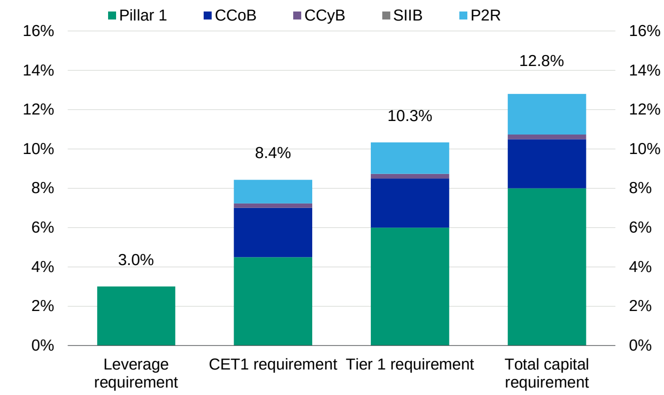
Solid distance to minimum capital requirements is further supported by declining Pillar 2 requirements (P2R) — the European Central Bank has lowered P2R from 2.75% for total capital and 1.55% for CET1 in 2021 to 1.82% and 1.02%, respectively, as of 2023, against the trend of either stable or even rising requirements for other German banks.

Exhibit 5
HCOB's capitalisation is high and far above industry standards ...



TCE = Tangible common equity (Moody's calculation); CET1 = Common Equity Tier 1; T1 = Tier 1 capital.
Source: Moody's Investors Service

Exhibit 6
... and significantly exceeds its capital requirements



CCoB = Capital conservation buffer; CCyB = Countercyclical capital buffer; SIIB = Systemically important institutions buffer; P2R = Pillar 2 requirement.
Requirements include the 2.5% capital conservation buffer and assumption of a partial fulfilment of the Pillar 2 requirement through Additional Tier 1 and Tier 2 instruments.
Source: Company

HCOB has sustainably improved profitability to a level where a higher level of loan losses can be absorbed without impairing its capital position

We assign a baa3 Profitability score to HCOB, in line with the initial score, which reflects our expectation that the bank will be able to maintain its strengthened profitability following extensive restructuring measures even in a more difficult economic environment.

HCOB drastically reduced costs, not least through a reduction in its workforce from more than 2,000 FTEs as of year-end 2016 to 868 FTEs by year-end 2022. Following a mix of additional FTE reductions and some selective new commercial and technology staff hires, HCOB's management now targets a workforce size of around 950 FTEs by year-end 2024.

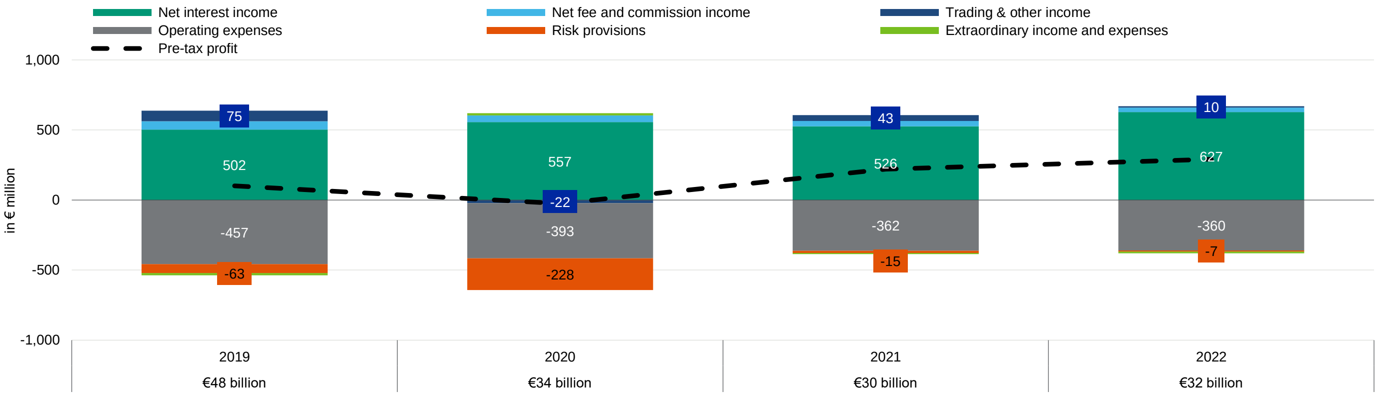
Efficiency improvements will remain paramount for the bank to achieve sustainably higher profitability. The bank's ownership structure does provide it access to additional process optimisation skills that help reposition its cost base. However, the bank's target of a cost-to-income ratio in the low 40s in percentage terms was reached in 2022, and reflects its focus on corporate banking and CRE lending. Achieving the target positions HCOB as one of the more efficient German banks. The improved efficiency places the bank in a good position to deal with potential challenges, such as higher risk costs as a result of the current economic downturn, and provides a buffer against adverse developments within the more cyclical part of the asset portfolio.

For 2022, HCOB reported an improved pretax profit of €363 million (2021: €299 million). The key growth driver was the combination of stable administrative expenses of €332 million in 2022 (2021 €328 million), with improved lending margins supporting a significant increase in net interest income to €627 million (2021: €526 million); and an €11 million reversal of loan loss provisions. Lower results from the fair value and trading, but also the fee and commission side, were more than balanced.

Exhibit 7

Tight cost management and rising net interest income support an improving outlook

In € millions; balance-sheet size as of year-end on X axis



Includes our adjustments for significant nonrecurring and unusual items except for 2022 (as reported). Risk provisions include provisions for non-credit risks.
Source: Moody's Investors Service

In 2023, a normalisation in loan loss provisions, driven by moderately rising problem loans, will constrain HCOB's results, which will, however, remain solid. HCOB's management guides a pre-tax profit of around €350 million for 2023. After the bank's IT transformation, which it expects to conclude in 2023, HCOB aims to operate with a highly competitive cost-to-income ratio of 45%, also based on a net interest margin of around 200 basis points by 2023.

HCOB's funding profile is more mature after the transformation

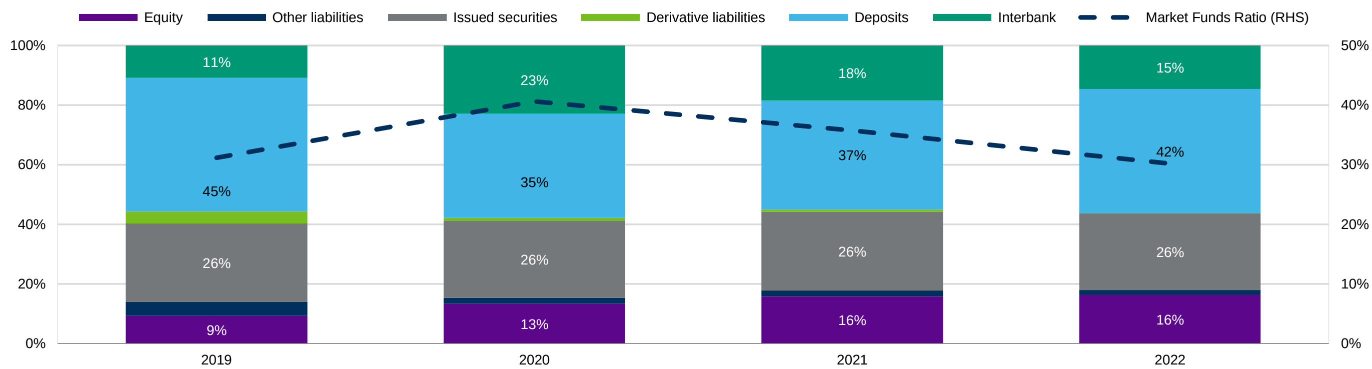
We assign a ba3 Funding Structure score to HCOB, two notches below the initial score, taking into account our expectations on the development of the bank's funding profile, additional information on market funding instruments, such as promissory notes and registered bonds that are accounted for as deposits, but also the bank's deposit quality, focusing on corporate clients.

As of January 2022, HCOB joined the voluntary deposit guarantee fund for Germany's private banks. This fund protects the claims of retail and small and medium-sized enterprise investors that exceed the coverage of the statutory deposit guarantee scheme and, to a lesser extent, also covers the deposits of corporate and selected institutional investors, that dominate HCOB's deposit base.

HCOB has been making sound progress in the transformation of its funding structure, in terms of both its maturity profile and funding cost. These had weighed on the bank as a result of investor caution ahead of HCOB's privatisation in 2018. Since then, the bank's pronounced leverage reduction has allowed for a reduction in the cost and shorter-term funding components. On its way to tapping longer-term funding, HCOB issued several benchmark-size unsecured and covered bonds. At the same time, the bank has been focusing on securing deposits with longer maturities, with a more granular base of lending or payment services to customers in recent years, while scaling back its plan to launch an online retail deposit franchise.

As of December 2022, HCOB reduced its recourse to central bank funding under the attractively priced targeted longer-term refinancing operations (TLTRO III) to €1.6 billion from €3 billion in 2020. Supported by the bank's progress in accessing other long-term funding and corporate deposits, HCOB is on track to reduce this temporarily employed source of funding.

Exhibit 8
HCOB's TLTRO drawing in 2020 temporarily increased interbank liabilities



Market funds ratio = Market funds as a percentage of tangible banking assets. Interbank funding includes central bank funding.
Source: Moody's Investors Service

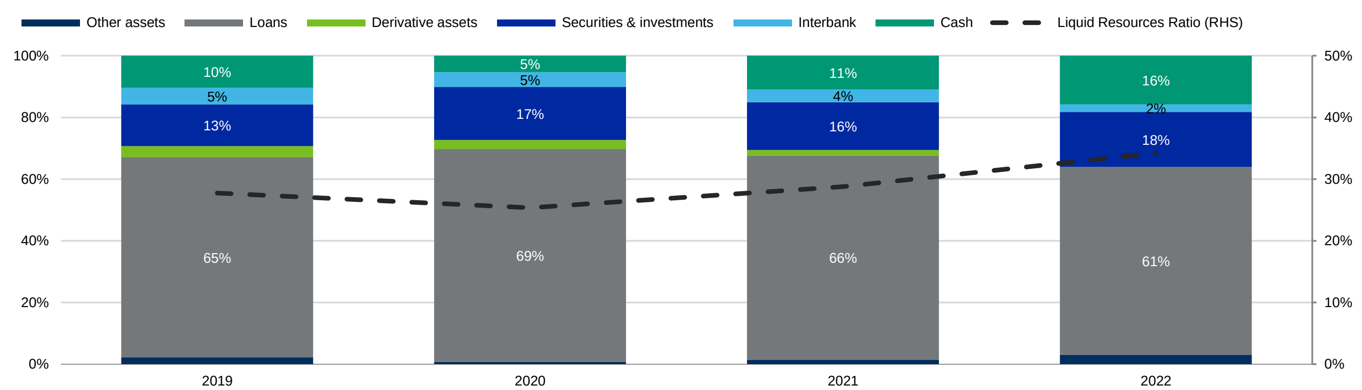
Substantial liquidity buffers to remain in place

We assign a baa2 Liquidity score to HCOB, two notches below the initial score, based on the available liquid resources after considering asset encumbrance.

HCOB maintained a €5.0 billion cash position as of year-end 2022, in addition to other liquid assets, including fixed-income securities, of €5.5 billion. The securities book is accounted for at fair value, with no unrealized losses. Once TLTRO funding is repaid, we expect the bank's unencumbered liquid resources to account for at least 20% of its tangible banking assets.

HCOB's regulatory net stable funding ratio of 113% and LCR of 197% as of year-end 2022 are well above regulatory minima, indicating a sound coverage of the likely near-term liquidity outflow, including the dividend. By 2024, HCOB targets to maintain a sound LCR in excess of 140%. The NSFR remained stable at 113%.

Exhibit 9
HCOB maintains sufficient balance-sheet liquidity
Composition of assets



Liquid resources ratio = Liquid banking assets as a percentage of tangible banking assets.
Source: Moody's Investors Service

Business diversification adjustment

To reflect the risks from HCOB's focus on the asset-based lending business model, we apply a one-notch qualitative adjustment for its limited business diversification in our scorecard.

HCOB has maintained its focus on asset-based lending, despite its diversification into corporate lending, with a strong emphasis on domestic CRE lending, renewable energy projects and shipping loans. A greater degree of specialisation may limit the bank's ability to mitigate unexpected earnings volatility from its core activities.

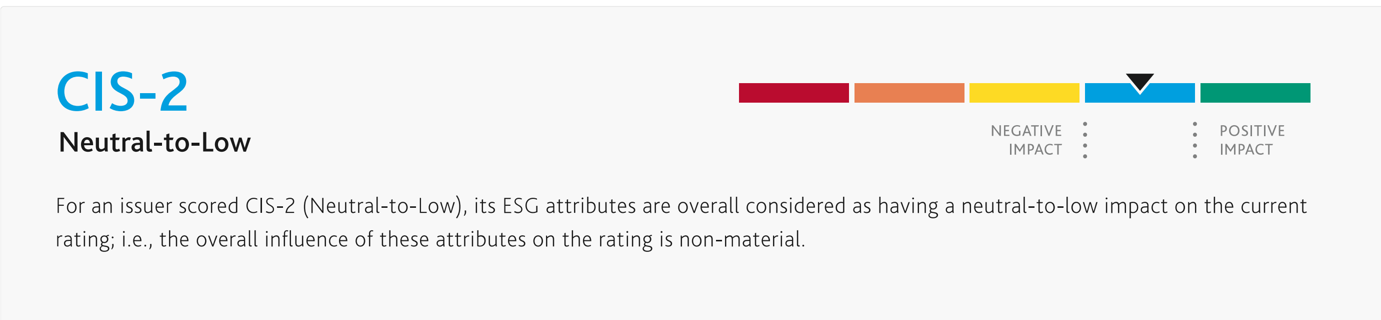
Business diversification is an important gauge of a bank's sensitivity to stress in a single business line. It is related to earnings stability in the sense that earnings diversification across distinct and relatively uncorrelated lines of business increases the reliability of a bank's earnings streams and its potential to absorb shocks affecting a business line.

In particular, through its emphasis on CRE and ship lending, HCOB will be exposed to a rather volatile banking business through the cycle. CRE and ship lending is a highly cyclical and, therefore, higher-risk sector. CRE and shipping exposures can cause significant losses in times of financial market stress.

ESG considerations

Hamburg Commercial Bank AG's ESG Credit Impact Score is Neutral-to-Low CIS-2

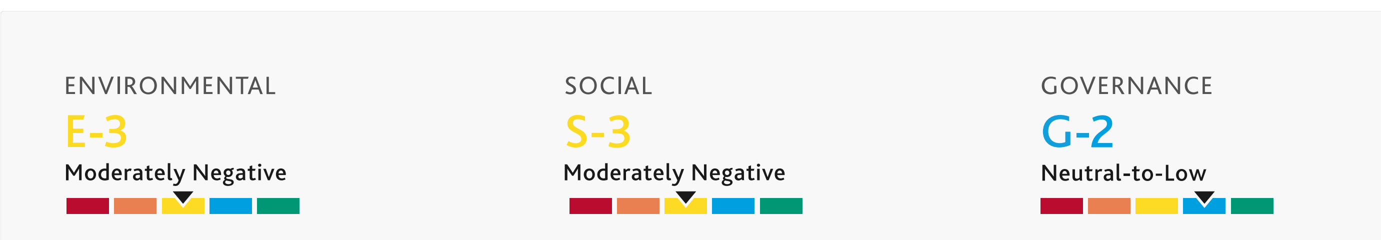
Exhibit 10
ESG Credit Impact Score



Source: Moody's Investors Service

Hamburg Commercial AG's (HCOB)'s **CIS-2 i**ndicates that ESG considerations have no material impact on the current ratings. The bank's corporate governance risks are low, with a high-risk appetite as part of its business model as an asset based finance specialist being mitigated by good controls and risk management.

Exhibit 11
ESG Issuer Profile Scores



Source: Moody's Investors Service

Environmental

HCOB faces moderate environmental risks primarily because of its exposure to carbon transition risk in its corporate loan book. In line with its peers, HCOB is facing mounting business risks and stakeholder pressure to meet broader carbon transition goals. In response, HCOB in engaging in integrating climate considerations in its credit risk assessment and supporting customers to facilitate their carbon transition.

Social

HCOB faces moderate exposure to social risks related to regulatory and litigation risks, requiring the bank to meet high compliance standards. Customer relations risks related to mis-selling and mis-representation are lower than industry average because of the bank's focus on institutional customers combined with a strong conduct track record. The bank is also proactively adapting to changing customer preferences (such as digitalisation and sustainable products).

Governance

HCOB's governance risks are low, despite its higher risk appetite and concentration risks inherent in its business model as an asset-based finance specialist. The bank's strategy, risk management function and organisational structure are in line with industry practices. HCOB's management enjoys a good track record with regards to the turnaround of the bank, including prudent management of its highly cyclical exposures, as visible in low non-performing loans and limited risk costs, underpinning a solid earnings potential and capital generation capacity. Finally, the bank's supervisory board reflects it ownership structure, dominated by a few private equity houses, exposing the bank to potential outsized influence by the controlling shareholders. Germany's developed institutional framework mitigates associated governance risks.

ESG Issuer Profile Scores and Credit Impact Scores for the rated entity/transaction are available on Moodys.com. In order to view the latest scores, please click here to go to the landing page for the entity/transaction on MDC and view the ESG Scores section.

Support and structural considerations

Affiliate support

We assume a low probability that HCOB's owners — primarily private equity funds, including Cerberus Capital Management, L.P., J.C. Flowers & Co. and Golden Tree Asset Management LNP — would support the bank in case of need, which results in no uplift for the baa3 Adjusted BCA from the bank's BCA.

Loss Given Failure (LGF) analysis

HCOB is subject to the EU Bank Recovery and Resolution Directive (BRRD), which we consider an operational resolution regime. We, therefore, apply our Advanced LGF analysis, where we consider the risks faced by the different debt and deposit classes across the liability structure, should the bank enter resolution.

In line with our standard assumptions, we assume residual TCE of 3% and post-failure losses of 8% of tangible banking assets, a 25% runoff in junior wholesale deposits and a 5% runoff in preferred deposits.

» For deposits and senior unsecured debt rated A3, our LGF analysis indicates an extremely low loss given failure, leading to a three-notch uplift above the baa3 Adjusted BCA.

» For junior senior unsecured debt rated Baa2, our LGF analysis indicates a low loss given failure, leading to a one-notch uplift from its baa3 Adjusted BCA.

» For HCOB's subordinated programme rated (P)Ba1, our LGF analysis indicates a high loss given failure, leading us to position its rating one notch below the baa3 Adjusted BCA.

Government support considerations

Since the introduction of the BRRD, we have only very selectively assigned moderate expectations of support that the government might provide to a bank in Germany in times of need. Because of its small size relative to the German banking system and its limited degree of interconnectedness, we continue to assign a low government support probability to HCOB, which does not result in any rating uplift.

Counterparty Risk Ratings (CRRs)

HCOB's CRRs are A3/P-2

The CRRs are three notches above the bank's baa3 Adjusted BCA, based on the extremely low loss given failure from the high volume of instruments that are subordinated to CRR liabilities, reflected in three notches of uplift.

Counterparty Risk (CR) Assessment

HCOB's CR Assessment is A3(cr)/P-2(cr)

The bank's CR Assessment is three notches above its baa3 Adjusted BCA, based on the buffer against default provided by more subordinated instruments to the senior obligations represented by the CR Assessment. Because the CR Assessment captures the probability of default on certain senior operational obligations, rather than expected loss, we focus purely on subordination and take no account of the volume of the instrument class.

Methodology and scorecard

The principal methodology we used in rating HCOB was our Banks Methodology, published in July 2021.

About Moody's Bank Scorecard

Our scorecard is designed to capture, express and explain in summary form our Rating Committee's judgement. When read in conjunction with our research, a fulsome presentation of our judgement is expressed. As a result, the output of our scorecard may materially differ from that suggested by raw data alone (though it has been calibrated to avoid the frequent need for strong divergence). The scorecard 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 methodology and scorecard factors

Exhibit 12

Hamburg Commercial Bank AG

Macro Factors		
Weighted Macro Profile	**Strong**	**100%**

Factor	**Historic Ratio**	**Initial Score**	**Expected Trend**	**Assigned Score**	**Key driver #1**	**Key driver #2**
Solvency						
Asset Risk						
Problem Loans / Gross Loans	2.2%	a3	↔	ba1	Sector concentration	Quality of assets
Capital						
Tangible Common Equity / Risk Weighted Assets (Basel III - transitional phase-in)	31.9%	aa2	↔	aa3	Expected trend	Risk-weighted capitalisation
Profitability						
Net Income / Tangible Assets	0.6%	baa3	↔	baa3	Expected trend	Return on assets
Combined Solvency Score		a2		baa1		
Liquidity						
Funding Structure						
Market Funds / Tangible Banking Assets	30.2%	ba1	↔	ba3	Deposit quality	Extent of market funding reliance
Liquid Resources						
Liquid Banking Assets / Tangible Banking Assets	34.2%	a3	↔	baa2	Stock of liquid assets	Asset encumbrance
Combined Liquidity Score		baa2		ba1		
Financial Profile				baa2		
Qualitative Adjustments				Adjustment		
Business Diversification				-1		
Opacity and Complexity				0		
Corporate Behavior				0		
Total Qualitative Adjustments				-1		
Sovereign or Affiliate constraint				Aaa		
BCA Scorecard-indicated Outcome - Range				baa2 - ba1		
Assigned BCA				baa3		
Affiliate Support notching				0		
Adjusted BCA				baa3		

Balance Sheet is not applicable.

Debt Class	De Jure waterfall		De Facto waterfall		Notching		LGF Notching Guidance vs. Adjusted BCA	Assigned LGF notching	Additional Notching	Preliminary Rating Assessment
	Instrument volume + subordination	Sub-ordination	Instrument volume + subordination	Sub-ordination	De Jure	De Facto				
Counterparty Risk Rating	-	-	-	-	-	-	-	3	0	a3
Counterparty Risk Assessment	-	-	-	-	-	-	-	3	0	a3 (cr)
Deposits	-	-	-	-	-	-	-	3	0	a3
Senior unsecured bank debt	-	-	-	-	-	-	-	3	0	a3
Junior senior unsecured bank debt	-	-	-	-	-	-	-	1	0	baa2
Dated subordinated bank debt	-	-	-	-	-	-	-	-1	0	ba1

Instrument Class	Loss Given Failure notching	Additional notching	Preliminary Rating Assessment	Government Support notching	Local Currency Rating	Foreign Currency Rating
Counterparty Risk Rating	3	0	a3	0	A3	A3
Counterparty Risk Assessment	3	0	a3 (cr)	0	A3(cr)	
Deposits	3	0	a3	0	A3	A3
Senior unsecured bank debt	3	0	a3	0	A3	A3
Junior senior unsecured bank debt	1	0	baa2	0	Baa2	
Dated subordinated bank debt	-1	0	ba1	0	(P)Ba1	

[1] Where dashes are shown for a particular factor (or sub-factor), the score is based on non-public information.
Source: Moody's Investors Service

Ratings

Exhibit 13

Category	Moody's Rating
HAMBURG COMMERCIAL BANK AG	
Outlook	Stable
Counterparty Risk Rating	A3/P-2
Bank Deposits	A3/P-2
Baseline Credit Assessment	baa3
Adjusted Baseline Credit Assessment	baa3
Counterparty Risk Assessment	A3(cr)/P-2(cr)
Issuer Rating	A3
Senior Unsecured -Dom Curr	A3
Junior Senior Unsecured -Dom Curr	Baa2
Junior Senior Unsecured MTN -Dom Curr	(P)Baa2
Subordinate MTN -Dom Curr	(P)Ba1
Commercial Paper -Dom Curr	P-2
Other Short Term -Dom Curr	(P)P-2

Source: Moody's Investors Service

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