

FITCH TAKES ACTIONS ON MEXICAN FIS AFTER SOVEREIGN OUTLOOK REVISION TO NEGATIVE

Fitch Ratings-Monterrey-06 November 2018: Fitch Ratings has conducted a portfolio review of selected Mexican Financial Institutions (FIs) following the revision of Mexico's sovereign rating Outlook to Negative from Stable on Oct. 31, 2018. (See "Fitch Affirms Mexico at 'BBB+'; Revises Outlook to Negative" at 'www.fitchratings.com'.)

The portfolio review includes Mexican FIs with Issuer Default Ratings (IDRs), Viability Ratings (VRs) or Insurer's Financial Strength Ratings (IFS ratings) that are at the same, above or one notch below the sovereign level. Fitch believes these ratings are more sensitive to a potential sovereign downgrade or any deterioration of the operating environment over the near term. Most of these entities' IDRs have been affirmed and the Rating Outlooks revised to Negative from Stable, except for a few particular cases further described below. A full list of rating actions follows at the end of this commentary.

KEY RATING DRIVERS

Government-Support Driven Ratings

This group considers state-owned banks or government financial institutions with IDRs, Support Ratings (SRs) and Support Rating Floors (SRFs) driven by explicit support (Bancomext, Banobras and Nafin) or implicit support (Infonavit and IPAB) from the sovereign, where the federal government is the shareholder and the source of any potential support, if required.

The Negative Outlook on this group highlights downside potential from a sovereign downgrade. The creditworthiness of these entities is linked to the country's federal government, given their policy role and/or high strategic importance to the government. Therefore, their ratings have been traditionally aligned to the sovereign's, which explains the Outlook revision to Negative from Stable.

Local Commercial Banks & Subsidiaries

This group considers local commercial banks whose international ratings are at or close to the sovereign rating and driven by their stand-alone credit profiles as reflected by their VRs, and therefore are relatively sensitive to a sovereign downgrade or a worsening operating environment (Banco Inbursa and Banco Compartamos).

The Negative Outlook for entities in this group, whose performance and prospects could be affected because of a worsening operating environment, reflects Fitch's expectations that the relativities of the VRs/IDRs versus the sovereign rating will be maintained in the event of a potential sovereign downgrade.

The Negative Outlook on the IFS rating of Seguros Inbursa, S.A. (Seguros Inbursa) is mirroring the action on Banco Inbursa. Seguros Inbursa's rating is based on legal explicit support given by its holding group Grupo Financiero Inbursa (GFInbursa), in which, according to the Financial Groups Law, the holding group, if required, will grant unlimited support for its subsidiaries. Fitch considers GFInbursa's credit quality similar and aligned with that of its main operating subsidiary, Banco Inbursa.

Grupo Financiero Banorte, S.A.B. de C.V. and Banco Mercantil del Norte S.A., Institucion de Banca Multiple were not included in this portfolio review, since their ratings are already on Rating Watch Negative, due to a recent acquisition and merger. Fitch expects to resolve the Rating Watch status separately in the following weeks.

Foreign Owned Commercial Banks

The third group considers foreign-owned commercial banks whose IDRs are driven by institutional support at or above the sovereign level (Citibanamex, SAN Mexico, HSBC Mexico) or where the IDRs are driven by a VR that is above the sovereign rating (BBVA Bancomer).

The revision on the Outlooks to Negative from Stable for the support-driven 'A' IDRs of Citibanamex and HSBC Mexico, reflect the fact that these ratings are already at the maximum uplift of two notches above the sovereign; any potential downgrade of the sovereign rating will likely have a similar effect on these banks' IDRs.

The Negative Outlook on BBVA Bancomer's IDRs reflects its VR, which is already one notch above the sovereign, an uplift that Fitch is unlikely to widen in the future. As a result, this bank's VR and IDRs will likely mirror a potential sovereign downgrade. However, downside potential on the IDRs is limited to 'BBB+', which is the minimum level implied in consideration of the potential support of Spain's Banco Bilbao Vizcaya Argentaria (BBVA, rated A-/Stable Outlook), considering BBVA Bancomer's role as a core subsidiary of material size for its ultimate parent.

SAN Mexico's IDRs were affirmed with a Stable Outlook because SAN Mexico's IDRs, currently driven by its intrinsic profile, are already at the minimum level implied by Fitch's support approach derived from its parent's IDRs (Banco Santander, S.A. rated at A-/Outlook Stable). While VRs do not have explicit Outlooks, Fitch expects that SAN Mexico's VR would be downgraded in the event of a sovereign downgrade, since its stand-alone credit profile is unlikely to be rated above Mexico's sovereign rating.

While not driving its IDRs, Citibanamex's VR would also likely mirror a potential sovereign downgrade, given its relatively high level (one notch above the sovereign level). In turn, given its current relatively low level, HSBC Mexico's 'bbb-' VR is not expected to be affected in the event of a sovereign downgrade or a moderate deterioration of the local operating environment.

Bolsa Mexicana de Valores and Subsidiaries

The affirmation of Bolsa Mexicana de Valores' (BMV) ratings and its Stable Rating Outlook are driven by the resilience of its credit profile, which considers its virtually zero leverage, highly cash flow generating business model that benefits from a diversified revenue base, and the relevant contribution of non-transactional sources of income. Therefore, Fitch believes that these IDRs could be unaffected in a potential scenario of a one-notch sovereign downgrade. The affirmation of Asigna's and CCV's ratings and their Stable Outlook are aligned with the actions taken on its parent (BMV), since these are support driven ratings.

SUPPORT RATINGS (SRs) and SUPPORT RATING FLOORS (SRFs)

The existing SRs and SRFs of banks included in this portfolio review have been affirmed, since the sovereign Outlook revision does not affect Fitch's views on the drivers of these ratings. However, the state-owned banks' SRFs would typically mirror any change on the sovereign rating. Fitch's SRFs indicate a level below which the agency will not lower the bank's Long-Term IDRs, as long as the assessment of the support factors does not change.

NATIONAL SCALE RATINGS

No changes are expected in the national scale ratings of these or other FIs in Mexico, derived from a potential downgrade of the sovereign, since these ratings are local relative rankings of creditworthiness within a particular jurisdiction. Fitch does not expect these relativities to change in the event of a moderate downgrade in the sovereign rating; therefore, no rating actions have been taken on the national scale ratings.

DEBT RATINGS

Although they do not have an explicit outlook, the global debt ratings (senior unsecured, subordinated debt and hybrids) would mirror any potential movements on the respective IDRs in order to reflect the potential action on the sovereign. The senior unsecured debt ratings would be aligned with their respective banks' IDRs. The subordinated debt and hybrids would maintain the same differentiation with the respective anchor ratings.

RATING SENSITIVITIES

VRs, IDRs and IFS

The ratings and Outlooks for the financial institutions included in this portfolio review are sensitive to any further changes in Mexico's sovereign ratings, or material deterioration on the local operating environment over the foreseeable future. In Fitch's view, there is a material possibility that the IDRs/IFS that now have a Negative Rating Outlook would be downgraded in the event of a sovereign downgrade. The same would stand for the VRs of BBVA Bancomer, Citibanamex, SAN Mexico, Banco Inbursa and Banco Compartamos.

Short-term ratings do not have Outlooks, but any downgrade of the respective Long-term IDR could trigger a one-notch downgrade of the Short-term IDRs of issuers in the first and second groups. Specifically in the third group, SAN Mexico would be downgraded to 'F3' from 'F2' and HSBC Mexico, BBVA Bancomer and Citibanamex to 'F2' from 'F1'.

There is limited upside potential on BMV and Subsidiaries' ratings, especially with the current Negative Outlook of the sovereign. However, it could occur in the medium term if there is a substantial increase in trading volumes. At the same time, if there is an improvement in Mexico's operating environment, and by a sustained growth in non-transactional sources of revenue. BMV would also need to maintain its strong financial performance in order for an upgrade to occur.

SRs and SRFs

Fitch does not expect SRs to change, even in the event of a potential sovereign downgrade. However, the SRFs of Nafin, Bancomext, Banobras, Infonavit and IPAB are aligned to the sovereign rating; therefore, they will likely change in line with any potential sovereign downgrade.

The SRF for Banco Inbursa is driven by the potential sovereign support, considering its respective systemic importance, but is below the sovereign rating. Therefore, Banco Inbursa's SRFs are unlikely to be affected in the event of a moderate sovereign downgrade.

For further specific sensitivities for each issuer, please refer to their individual press releases and/or rating reports at www.fitchratings.com.

Fitch has affirmed the following ratings and revised Outlooks as indicated:

Banco Nacional de Comercio Exterior, S.N.C (Bancomext)

--Long-Term Foreign and Local Currency IDR at 'BBB+'; Outlook to Negative from Stable;

- Short-Term Foreign and Local Currency IDR at 'F2';
- Support Rating at '2';
- Support Rating Floor at 'BBB+';
- Long-Term subordinated notes at 'BBB'.

Banco Nacional de Obras y Servicios Publicos, S.N.C. (Banobras)

- Long-Term Foreign and Local Currency IDR at 'BBB+'; Outlook to Negative from Stable;
- Short-Term Foreign and Local Currency IDR at 'F2';
- Support Rating at '2';
- Support Rating Floor at 'BBB+'.

Nacional Financiera, S.N.C. (Nafin)

- Long-Term Foreign and Local Currency IDR at 'BBB+'; Outlook to Negative from Stable;
- Short-Term Foreign and Local Currency IDR at 'F2';
- Support Rating at '2';
- Support Rating Floor at 'BBB+';
- Long-term senior unsecured debt issuances at 'BBB+';
- Senior unsecured certificates of deposits (CDs) program and outstanding issuances at 'BBB+/F2'.

Instituto del Fondo Nacional de la Vivienda para los Trabajadores (Infonavit)

- Long-Term Foreign and Local Currency IDR at 'BBB+'; Outlook to Negative from Stable;
- Short-Term Foreign and Local Currency IDR at 'F2';
- Support Rating at '2';
- Support Rating Floor at 'BBB+'.

Instituto para la Proteccion al Ahorro Bancario (IPAB)

- Long-Term Foreign and Local Currency IDR at 'BBB+'; Outlook to Negative from Stable;
- Short-Term Foreign and Local Currency IDR at 'F2';
- Support Rating at '2';
- Support Rating Floor at 'BBB+'.

Banco Nacional de Mexico, S.A. (Citibanamex)

- Long Term Foreign and Local Currency IDRs at 'A'; Outlook to Negative from Stable;
- Viability rating at 'a-';
- Short-Term Foreign and Local Currency IDR at 'F1';
- Support Rating at '1'.

BBVA Bancomer, S.A. (BBVA Bancomer)

- Long Term Foreign and Local Currency IDRs at 'A-'; Outlook to Negative from Stable;
- Viability rating at 'a-';
- Short-Term Foreign and Local Currency IDR at 'F1';
- Support Rating at '2';
- Long-term hybrid subordinated notes at 'BBB-';
- Long-term junior subordinated notes at 'BB+';
- Long-term senior unsecured global notes at 'A-';
- Long-term Basel III compliant Tier 2 hybrid subordinated notes at 'BBB-'.

Banco Santander (Mexico), S.A. (SAN Mexico)

- Long-Term foreign and local currency IDRs at 'BBB+'; Outlook Stable;
- Viability rating at 'bbb+';
- Short-Term Foreign and Local Currency IDR at 'F2';
- Support Rating at '2';
- Long-term senior unsecured global notes at 'BBB+';
- Long-term Basel III compliant Tier 2 hybrid subordinated notes at 'BBB-'.

--Perpetual subordinated non-preferred contingent convertible capital notes which qualify as additional Tier 1 at 'BB'.

Banco Inbursa, S.A. (Banco Inbursa)

--Long-Term Foreign and Local Currency IDRs at 'BBB+'; Outlook to Negative from Stable;
--Viability rating at 'bbb+';
--Short-Term Foreign and Local Currency IDR at 'F2';
--Support Rating at '3';
--Support Rating Floor at 'BB+';
--Long-term senior unsecured global notes at 'BBB+'.

Seguros Inbursa, S.A., Grupo Financiero Inbursa (Seguros Inbursa)

--Insurer Financial Strength at 'BBB+'; Outlook to Negative from Stable.

HSBC Mexico, S.A. (HSBC Mexico)

--Long-Term Foreign and Local Currency IDRs at 'A'; Outlook to Negative from Stable;
--Viability rating at 'bbb-';
--Short-Term Foreign and Local Currency IDR at 'F1';
--Support Rating at '1'.

Banco Compartamos, S.A. I.B.M (Compartamos)

--Long-Term Foreign and Local Currency IDRs at 'BBB', Outlook to Negative from Stable;
--Viability Rating at 'bbb';
--Short-Term Foreign and Local Currency IDR at 'F2';
--Support Rating at '5';
--Support Rating Floor at 'NF'.

Bolsa Mexicana de Valores, S.A.B. de C.V. (BMV)

--Long-Term Foreign and Local Currency IDRs 'BBB+'; Outlook Stable;
--Short-Term Foreign and Local Currency IDRs 'F2';

Asigna Compensacion y Liquidacion F30430 FISO BANCOMER SA (Asigna)

--Long-Term Foreign and Local Currency IDRs 'BBB+'; Outlook Stable;
--Short-Term Foreign and Local Currency IDRs 'F2';

Contraparte Central de Valores de Mexico, S.A. de C.V. (CCV)

--Long-Term Foreign and Local Currency IDRs 'BBB+'; Outlook Stable;
--Short-Term Foreign and Local Currency IDRs 'F2';

Contact:

Alejandro Tapia (Primary Analyst: Citibanamex and Infonavit / Secondary Analyst: BBVA Bancomer & Banco Inbursa)

Director

+52 81 8399-9156

Fitch Mexico, S.A. de C.V.

Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Monica Ibarra (Primary Analyst: BBVA Bancomer, Bancomext, Compartamos and Asigna / Secondary Analyst: IPAB and CCV)

Director

+52 81 8399-9150

Fitch Mexico, S.A. de C.V.

Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Alba Maria Zavala, CFA (Primary Analyst: SAN Mexico & BMV / Secondary Analyst: Compartamos and Asigna)
Associate Director
+52 81 8399-9137
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Bertha Perez (Primary Analyst: HSBC Mexico and Nafin)
Associate Director
+52 81 8399-9161
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Bertha Cantu (Primary Analyst: CCV)
Director
+52 81 8399-9128
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Priscila Garcia (Primary Analyst: Banco Inbursa / Secondary Analyst: Nafin)
Analyst
+52 81 8399-9100; ext. 1515
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Armando Garza (Primary Analyst: Banobras / Secondary Analyst: HSBC Mexico and Infonavit)
Analyst
+52 81 8399-9157
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Fernando Sosa (Primary Analyst: IPAB)
Associate Director
+52 81 8399-9165
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Veronica Chau (Secondary Analyst: Banobras and BMV)
Senior Director
+52 81 8399-9169
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Hugo Garza (Secondary Analyst: SAN Mexico and Bancomext)
Associate Director
+52 81 8399-9143
Fitch Mexico, S.A. de C.V.
Prol. Alfonso Reyes 2612, Monterrey, N.L. Mexico

German Valle (Secondary Analyst: Citibanamex)
Associate Director
+52 81 8399-9116
Fitch Mexico, S.A. de C.V.

ProL. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Mariana Gonzalez (Primary Analyst: Seguros Inbursa)

Analyst

+52 81 8399-9136

Fitch Mexico, S.A. de C.V.

ProL. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Eugenia Martinez (Secondary Analyst: Seguros Inbursa)

Associate Director

+52 81 8399-9155

Fitch Mexico, S.A. de C.V.

ProL. Alfonso Reyes 2612, Monterrey, N.L. Mexico

Committee Chairperson

Alejandro Garcia, CFA

Managing Director

+1-212-908-9137

Summary of Financial Statement Adjustments:

Bancomext, Banobras, Nafin, Infonavit and IPAB:

Pre-paid expenses and other deferred assets were re-classified as intangibles and deducted from Fitch Core Capital due to low loss absorption capacity under stress.

Citibanamex, SAN Mex and Banco Inbursa

Pre-paid expenses and other deferred assets were re-classified as intangibles and deducted from Fitch Core Capital due to low loss absorption capacity under stress. Fitch has made adjustments to the Risk Weighted Assets (RWAs) following its criteria and the agency consolidated the bank's RWAs with those of its subsidiaries with lending operations.

BBVA Bancomer, HSBC Mexico and Banco Compartamos

Pre-paid expenses and other deferred assets were re-classified as intangibles and deducted from Fitch Core Capital due to low loss absorption capacity under stress.

Media Relations: Elizabeth Fogerty, New York, Tel: +1 212 908 0526, Email:

elizabeth.fogerty@fitchratings.com.

Additional information is available on www.fitchratings.com

Applicable Criteria

Bank Rating Criteria (pub. 12 Oct 2018)

<https://www.fitchratings.com/site/re/10044408>

Insurance Rating Criteria (pub. 30 Nov 2017)

<https://www.fitchratings.com/site/re/905036>

Non-Bank Financial Institutions Rating Criteria (pub. 12 Oct 2018)

<https://www.fitchratings.com/site/re/10044407>

ALL FITCH CREDIT RATINGS ARE SUBJECT TO CERTAIN LIMITATIONS AND DISCLAIMERS. PLEASE READ THESE LIMITATIONS AND DISCLAIMERS BY FOLLOWING THIS LINK: [HTTPS://WWW.FITCHRATINGS.COM/UNDERSTANDINGCREDITRATINGS](https://www.fitchratings.com/understandingcreditratings). IN ADDITION, RATING DEFINITIONS AND THE TERMS OF USE OF SUCH RATINGS ARE AVAILABLE ON THE AGENCY'S PUBLIC WEB SITE AT WWW.FITCHRATINGS.COM. PUBLISHED RATINGS, CRITERIA, AND METHODOLOGIES ARE AVAILABLE FROM THIS SITE AT ALL TIMES. FITCH'S CODE OF CONDUCT, CONFIDENTIALITY, CONFLICTS OF INTEREST, AFFILIATE FIREWALL, COMPLIANCE, AND OTHER RELEVANT POLICIES AND PROCEDURES ARE ALSO AVAILABLE FROM THE CODE OF CONDUCT SECTION OF THIS

SITE. DIRECTORS AND SHAREHOLDERS RELEVANT INTERESTS ARE AVAILABLE AT [HTTPS://WWW.FITCHRATINGS.COM/SITE/REGULATORY](https://www.fitchratings.com/site/regulatory). FITCH MAY HAVE PROVIDED ANOTHER PERMISSIBLE SERVICE TO THE RATED ENTITY OR ITS RELATED THIRD PARTIES. DETAILS OF THIS SERVICE FOR RATINGS FOR WHICH THE LEAD ANALYST IS BASED IN AN EU-REGISTERED ENTITY CAN BE FOUND ON THE ENTITY SUMMARY PAGE FOR THIS ISSUER ON THE FITCH WEBSITE.

Copyright © 2018 by Fitch Ratings, Inc., Fitch Ratings Ltd. and its subsidiaries. 33 Whitehall Street, NY, NY 10004. Telephone: 1-800-753-4824, (212) 908-0500. Fax: (212) 480-4435. Reproduction or retransmission in whole or in part is prohibited except by permission. All rights reserved. In issuing and maintaining its ratings and in making other reports (including forecast information), Fitch relies on factual information it receives from issuers and underwriters and from other sources Fitch believes to be credible. Fitch conducts a reasonable investigation of the factual information relied upon by it in accordance with its ratings methodology, and obtains reasonable verification of that information from independent sources, to the extent such sources are available for a given security or in a given jurisdiction. The manner of Fitch's factual investigation and the scope of the third-party verification it obtains will vary depending on the nature of the rated security and its issuer, the requirements and practices in the jurisdiction in which the rated security is offered and sold and/or the issuer is located, the availability and nature of relevant public information, access to the management of the issuer and its advisers, the availability of pre-existing third-party verifications such as audit reports, agreed-upon procedures letters, appraisals, actuarial reports, engineering reports, legal opinions and other reports provided by third parties, the availability of independent and competent third-party verification sources with respect to the particular security or in the particular jurisdiction of the issuer, and a variety of other factors. Users of Fitch's ratings and reports should understand that neither an enhanced factual investigation nor any third-party verification can ensure that all of the information Fitch relies on in connection with a rating or a report will be accurate and complete. Ultimately, the issuer and its advisers are responsible for the accuracy of the information they provide to Fitch and to the market in offering documents and other reports. In issuing its ratings and its reports, Fitch must rely on the work of experts, including independent auditors with respect to financial statements and attorneys with respect to legal and tax matters. Further, ratings and forecasts of financial and other information are inherently forward-looking and embody assumptions and predictions about future events that by their nature cannot be verified as facts. As a result, despite any verification of current facts, ratings and forecasts can be affected by future events or conditions that were not anticipated at the time a rating or forecast was issued or affirmed.

The information in this report is provided "as is" without any representation or warranty of any kind, and Fitch does not represent or warrant that the report or any of its contents will meet any of the requirements of a recipient of the report. A Fitch rating is an opinion as to the creditworthiness of a security. This opinion and reports made by Fitch are based on established criteria and methodologies that Fitch is continuously evaluating and updating. Therefore, ratings and reports are the collective work product of Fitch and no individual, or group of individuals, is solely responsible for a rating or a report. The rating does not address the risk of loss due to risks other than credit risk, unless such risk is specifically mentioned. Fitch is not engaged in the offer or sale of any security. All Fitch reports have shared authorship. Individuals identified in a Fitch report were involved in, but are not solely responsible for, the opinions stated therein. The individuals are named for contact purposes only. A report providing a Fitch rating is neither a prospectus nor a substitute for the information assembled, verified and presented to investors by the issuer and its agents in connection with the sale of the securities. Ratings may be changed or withdrawn at any time for any reason in the sole discretion of Fitch. Fitch does not provide investment advice of any sort. Ratings are not a recommendation to buy, sell, or hold any security. Ratings do not comment on the adequacy of market price, the suitability of any security for a particular investor, or the tax-exempt nature or taxability of payments made in respect to any security. Fitch receives fees from issuers, insurers, guarantors, other obligors, and underwriters for rating securities. Such fees generally vary from US\$1,000 to US\$750,000 (or the applicable currency equivalent) per issue. In certain cases, Fitch will rate all or a number of issues issued by a particular issuer, or insured or guaranteed by a particular insurer or guarantor, for a single annual fee. Such fees are expected to vary from US\$10,000 to US\$1,500,000 (or the applicable currency equivalent). The assignment, publication, or dissemination of a rating by Fitch shall not constitute a consent by Fitch to use its name as an expert in connection with any registration statement filed under the United States securities laws, the Financial Services and Markets Act of 2000 of the United Kingdom, or the securities laws of any particular jurisdiction. Due to the relative efficiency of electronic publishing and distribution, Fitch research may be available to electronic subscribers up to three days earlier than to print subscribers.

For Australia, New Zealand, Taiwan and South Korea only: Fitch Australia Pty Ltd holds an Australian financial services license (AFS license no. 337123) which authorizes it to provide credit ratings to wholesale clients only. Credit ratings information published by Fitch is not intended to be used by persons who are retail clients within the meaning of the Corporations Act 2001

Fitch Ratings, Inc. is registered with the U.S. Securities and Exchange Commission as a Nationally Recognized Statistical Rating Organization (the "NRSRO"). While certain of the NRSRO's credit rating subsidiaries are listed on Item 3 of Form NRSRO and as such are authorized to issue credit ratings on behalf of the NRSRO (see <https://www.fitchratings.com/site/regulatory>), other credit rating subsidiaries are not listed on Form NRSRO (the "non-NRSROs") and therefore credit ratings issued by those subsidiaries are not issued on behalf of the NRSRO. However, non-NRSRO personnel may participate in determining credit ratings issued by or on behalf of the NRSRO.