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Amended Draft Mapping of European Rating Agency credit assessments under the Standardised Approach

1. Executive summary

1. This report describes the mapping exercise carried out by the Joint Committee (JC) to propose an amended 'mapping'¹ report of the credit assessments of European Rating Agency (ERA), with respect to the version published on 11 November 2015. The resulting mapping tables have been upgraded with respect to the afore-mentioned version.
2. The methodology applied to produce the mapping is the one specified in Commission Implementing Regulation (EU) 2016/1799 of 7 October 2016 (the Implementing Regulation)² laying down implementing technical standards with regard to the mapping of credit assessments of external credit assessment institutions for credit risk in accordance with Articles 136(1) and 136(3) of Regulation (EU) No 575/2013 of the European Parliament and of the Council (Capital Requirements Regulation – CRR). This Implementing Regulation employs a combination of the provisions laid down in Article 136(2) of the CRR.
3. The information base used to produce this mapping report reflects additional quantitative information collected after the submission of the draft Implementing Technical Standards by the JC to the European Commission, additional qualitative factors³ and material changes to the methodologies of municipalities and non-financial corporates reported by ERA.
4. The mapping neither constitutes the one which ESMA shall report on in accordance with Article 21(4b) of Regulation (EC) No 1060/2009 (Credit Rating Agencies Regulation - CRA) with the objective of allowing investors to easily compare all credit ratings that exist with regard to a specific rated entity⁴ nor should be understood as a comparison of the rating methodologies of

¹ According to Article 136(1), the 'mapping' is the correspondence between the credit assessments of and ECAI and the credit quality steps set out in Regulation (EU) No 575/2013 (Capital Requirements Regulation – CRR).

² OJ L 275, 12.10.2016, p. 3-18

³ Long-run default rate associated with all items assigned the same rating category, pursuant to point (a) of Article 136(2) of Regulation (EU) No 575/2013, as set out in Article 12 of the Implementing Regulation.

⁴ In this regard, please consider https://www.esma.europa.eu/sites/default/files/library/esma_2015-1473_report_on_the_possibility_of_establishing_one_or_more_mapping.pdf.

ERA with those of other ECAs. This mapping should however be interpreted as the correspondence of the rating categories of ERA with a regulatory scale which has been defined for prudential purposes. This implies that an appropriate degree of prudence may have been applied wherever not sufficient evidence has been found with regard to the degree of risk underlying the credit assessments.

5. As described in Recital 12 of the Implementing Regulation, it is necessary to avoid causing undue material disadvantage on those ECAs which, due to their more recent entrance in the market, present limited quantitative information, with the view to balancing prudential with market concerns. Updates to the mapping should be made wherever this becomes necessary to reflect quantitative information collected after the entry into force of the Implementing Regulation
6. The resulting mapping tables have been specified in Annex III of the revised draft ITS on the mapping of ECAs' credit assessments under Article 136(1) and (3) of Regulation (EU) No 575/2013. Figure 1 below shows the result for the main ratings scale of ERA, the Long-term rating scale.

Figure 1: Mapping of ERA's Long-term rating scale

Credit assessment	Credit quality step
AAA	1
AA	1
A	2
BBB	3
BB	4
B	5
CCC	6
CC	6
C	6
D	6

2. Introduction

7. This report describes the mapping exercise carried out by the JC to propose an amended 'mapping' report of the credit assessments of the European Rating Agency (ERA), with respect to the version published on 11 November 2015.
8. ERA is a credit rating agency that has been registered with ESMA in 30 July 2012 and therefore meets the conditions to be an eligible credit assessment institution (ECAI)⁵. ERA prepares rating assessments of organisations (municipalities and non-financial institutions) and security issues. At present, ERA issues ratings mainly to entities on the Slovak market and some other EU countries⁶.
9. The methodology applied to produce the mapping is the one specified in the Implementing Regulation. This Implementing Regulation employs a combination of the provisions laid down in Article 136(2) of the CRR. The information base used to produce this mapping report reflects additional quantitative information collected after the submission of the draft Implementing Technical Standards by the JC to the European Commission, additional qualitative factors⁷ and material changes to the methodologies of municipalities and non-financial corporates reported by ERA. The quantitative information is drawn from data available in the ESMA's central repository (CEREP⁸) based on the credit rating information submitted by the ECAIs as part of their reporting obligations.
10. The following sections describe the rationale underlying the mapping exercise carried out by the JC. Section 3 describes the relevant ratings scales of ERA for the mapping. Section 4 contains the methodology applied to derive the mapping of ERA's main ratings scale whereas Section 5 refers to the mapping of its remaining relevant rating scale. The mapping tables are shown in Appendix 4 of this document and have been specified in Annex III of the revised draft ITS on the mapping of ECAIs' credit assessments under Article 136(1) and (3) of Regulation (EU) No 575/2013.

⁵ It is important to note that the mapping does not contain any assessment of the registration process of ERA carried out by ESMA.

⁶ Source: ERA website (<http://www.euroratings.co.uk/index.php?lang=en>)

⁷ Long-run default rate associated with all items assigned the same rating category, pursuant to point (a) of Article 136(2) of Regulation (EU) No 575/2013, as set out in Article 12 of the Implementing Regulation.

⁸ <https://cerep.esma.europa.eu/cerep-web/>

3. ERA's credit ratings and rating scales

11. ERA produces two types of credit ratings. Column 2 of Figure 2 in Appendix 1 shows the relevant credit ratings that may be used by institutions for the calculation of risk weights under the Standardised Approach (SA)⁹:

- **Long-term issuer rating** – rating assigned to municipalities and entrepreneurial entities. Rating of towns and municipalities evaluates, on an independent basis, risks related to the ability and willingness of the town (municipality) to comply with its future liabilities. The rating of entrepreneurial entities provides creditors, investors but also the concerned entity with information and independent view on management processes and economic situation of the evaluated entity. Simultaneously the analysis aims at evaluating ability and willingness of an entrepreneurial entity to fulfil its liabilities resulting from its business activity. ERA also provides evaluation of following types of issues: Issues of towns, municipalities and municipal entities; other issues (bonds, bill of exchanges, etc.).
- **Short-term issuer rating** – similar to long-term ratings, with the difference that it refers to a short-term time horizon.

12. ERA assigns these credit ratings to different rating scales as illustrated in column 3 of Figure 2 in Appendix 1. Therefore, a specific mapping has been prepared for the following rating scales:

- **Global long-term rating scale.** The specification of this rating scale is described in Figure 3 of Appendix 1.
- **Global short-term rating scale.** The specification of this rating scale is described in Figure 4 of Appendix 1.

13. The mapping of the Global long-term rating scale is explained in Section 4 and it has been derived in accordance with the quantitative factors, qualitative factors and benchmarks specified in the Implementing Regulation.

14. The mapping of the Global short-term rating scale is explained in Section 5 and it has been indirectly derived from the mapping of the global long-term ratings scale and the relationship between these two scales, assessed by the Joint Committee based on the comparison of the meaning and relative position of the rating categories in both rating scales. This internal relationship is shown in Figure 5 of Appendix 1.

4. Mapping of ERA's global long-term rating scale

⁹ As explained in recital 4 ITS, Article 4(1) CRA allows the use of the credit assessments for the determination of the risk-weighted exposure amounts as specified in Article 113(1) CRR as long as they meet the definition of credit rating in Article 3(1)(a) CRA.

15. The mapping of the global long-term rating scale has consisted of two differentiated stages where the quantitative and qualitative factors as well as the benchmarks specified in Article 136(2) CRR have been taken into account.

16. In the first stage, the quantitative factors referred to in Article 1 of the Implementing Regulation have been taken into account to differentiate between the levels of risk of each rating category. The *long run default rate* of a rating category has been calculated in accordance with Article 6 of the Implementing Regulation, as the number of credit ratings cannot be considered to be sufficient for the purpose of the calculation of the short-run default rate.

17. In a second stage, the qualitative factors proposed in Article 7 of the Implementing Regulation have been considered to challenge the result of the previous stage.

4.1. Initial mapping based on the quantitative factors

4.1.1. Calculation of the long-run default rates

18. The available ratings information contained in CEREP is shown in Figures 6 and 7 in Appendix 3, cannot be considered sufficient for the calculation of the short and long run default rates specified in the Articles 3 – 5 of the Implementing Regulation. Therefore, the allocation of the CQS has been made in accordance with Article 6 of the Implementing Regulation, as shown in Figure 8 of Appendix 3.

19. For D rating category, no calculation of default rate has been made since it already reflects a 'default' situation.

4.1.2. Mapping proposal based on the long run default rate

20. As illustrated in the second column of Figure 9 in Appendix 4, the assignment of the rating categories to credit quality steps has been initially made in accordance with Article 6 of the Implementing Regulation. Therefore, the numbers of defaulted and non-defaulted rated items have been used together with the prior expectation of the equivalent rating category of the international rating scale. The results are specified in Figure 8 Appendix 3.

- **AAA/AA/A/BBB/BB/B:** there are no default registered in the historical series, therefore the number of rated items in each of these categories is equal or larger than the respective minimum required number of observed items given the number of defaulted items in the rating category. Thus, the credit quality steps associated with the AAA/AA, A, BBB, BB, B rating categories in the Global long-term rating scale (CQS 1, CQS 2, CQS 3, CQS 4 and CQS 5 respectively) can be assigned.
- **CCC-C:** since the CQS associated with the equivalent rating category of the international rating scale is 6, the proposed mapping for these rating categories is also CQS 6.

4.2. Final mapping after review of the qualitative factors

21. The qualitative factors specified in Article 7 of the Implementing Regulation have been used to challenge the mapping proposed by the default rate calculation. Qualitative factors acquire more importance in the rating categories where quantitative evidence is not sufficient to test the default behavior¹⁰, as it is the case for all ERA's rating categories.

22. The **definition of default** applied by ERA and used for the calculation of the quantitative factors has been analysed:

- The types of default events considered by ERA cover all the benchmark default events specified in Article 4(4) of the Implementing Regulation.
- As ERA does not have any default recorded, there is no information on the share of bankruptcy-related default events.

The mapping was amended based on the extension of the default definition.

23. The mapping proposal resulting from the quantitative factors complies with the qualitative criteria on the **meaning and relative position of a rating category**, as specified in Article 10 of the Implementing Regulation.

Regarding the **time horizon** reflected by the rating category, ERA's long-term rating categories focus on a horizon over one year. The limited rating data available does not allow the use of this factor. No adjustment is proposed based on this factor.

24. Finally, it should be highlighted the use of the long run default rate benchmark associated with the equivalent category in the international rating scale as the **estimate of the long run default rate** for the calculation of the quantitative factor of all rating categories under Article 6 of the ITS.

25. Regarding the estimate provided by ERA of the long-term default rate associated with all items assigned the same rating category, according to Article 12 of the Implementing Regulation, it should be taken into account for the purpose of the mapping as long as it has been adequately justified. Due to the limited quantitative data used to derive the estimate, no further adjustment has been made to the mapping based on this factor.

5. Mapping of ERA's global short-term rating scale

26. ERA also produces short-term ratings and assigns them to the global short-term rating scale (see Figure 4 in Appendix 1). Given that the default information referred to these rating categories cannot be comparable with the 3-year time horizon that characterizes the benchmarks established in the Implementing Regulation, the internal relationship assessed by the JC between these two rating scales (described in Figure 5 of Appendix 1) has been used to derive

¹⁰ The default behavior of a rating category is considered to be properly tested if the quantitative factors for that rating category are calculated under Articles 3 – 5 ITS.

the mapping of the global short-term rating scale. This should ensure the consistency of the mappings proposed for ERA.

27. More specifically, as each short-term rating can be associated with a range of long-term ratings, the CQS assigned to the short-term credit rating category has been determined based on the most frequently CQS assigned to the related long-term rating categories. In case of draw, the most conservative CQS has been considered.

28. The results are shown in Figure of Appendix 4:

- **S1.** This rating category indicates a high probability of capability and willingness to repay principal, interests and fixtures of an investment. It has been mapped to the long-term scale rating categories AAA/AA and A. Therefore, CQS 1 is the proposed mapping.
- **S2.** This rating category indicates a certain risk connected with capability and willingness to repay principal, interests and fixtures of an investment. It has been mapped to the long-term scale rating category BBB. Therefore, CQS 3 is the proposed mapping.
- **S3.** This rating category indicates higher risk related to the capability and willingness to repay principal, interests and fixtures of an investment. It has been mapped to the long-term scale rating category BB. Therefore, CQS 4 is the proposed mapping. Since the risk weights assigned to CQS 4 to 6 are all equal to 150% according to Article 131 CRR, the mapping proposed for the C rating category is CQS 4.
- **S4.** This rating category indicates a very high investment risk and industry a capability and willingness to repay principal, interests and fixtures of an investment. It has been mapped to the long-term scale rating category B. Therefore, CQS 5 is the proposed mapping. Since the risk weights assigned to CQS 4 to 6 are all equal to 150% according to Article 131 CRR, the mapping proposed for the C rating category is CQS 4.
- **NS.** This rating category indicates high probability that the company is not capable of repaying its financial liabilities. It has been mapped to the long-term rating category D. Therefore, CQS 6 is the proposed mapping. Since the risk weights assigned to CQS 4 to 6 are all equal to 150% according to Article 131 CRR, the mapping proposed for the C rating category is CQS 4.

Appendix 1: Credit ratings and rating scales

Figure 2: ERA's relevant credit ratings and rating scales

SA exposure classes	Name of credit rating	Credit rating scale
Long-term ratings		
Regional and local governments	Long-term issuer rating	Global long-term rating scale
Public sector entities	Long-term issuer rating	Global long-term rating scale
Institutions	Long-term issuer rating	Global long-term rating scale
Corporates	Long-term issuer rating	Global long-term rating scale
Short-term ratings		
Institutions	Short-term issuer rating	Global short-term rating scale
Corporates	Short-term issuer rating	Global short-term rating scale
Public sector entities	Short-term issuer rating	Global short-term rating scale
Regional and local governments	Short-term issuer rating	Global short-term rating scale

Source: ERA

Figure 3: Long-term rating scale

Credit assessment	Meaning of the credit assessment
AAA	Supreme rating. This symbol means that the company/title (issues) bears the minimum investment risk. The companies/titles labelled with this symbol contain very high probability of capability and willingness to pay principal, interests and fixtures of an investment in time and without any unnecessary delay. It is also highly improbable that the company/title might be threatened by alterations of economic or other external environments.
AA	The company/title (issue) bears a very low investment risk exposure. Companies/titles labelled with such symbol contain high probability of capability and willingness to pay principal, interest and fixtures of the investment in time and without any unnecessary delay. However, it is probable that the company/title may be threatened by distinct variations of economic or another external environment.
A	The company/title (issues) bears a low investment risk exposure. Companies/titles labelled with this symbol contain probability of uncertain capability or willingness to repay principal, interests and fixtures of investments in time and without any unnecessary delays. It is probable the company/title can be threatened by more serious variations of economic or another external environment.
BBB	The company/title (issues) bears a certain investment risk exposure. Companies/titles labelled with this symbol contain risk associated with capability or willingness to repay principal, interests and fixtures of investments in time and without any unnecessary delays. Capability of the company/issuer to pay principal, interests and fixtures of investment in time and without any unnecessary delay may be disturbed by variations of economic or another external environment.
BB	The company/title (issues) bears high investment risk exposure. Companies/titles labelled with this symbol contain high risk associated with capability or willingness to repay principal, interests and fixtures of investments in time and without any unnecessary delays. Capability of the company/issuer to repay principal, interests and fixtures of investment in time and without any unnecessary delay is not stable and may be substantially disturbed by variations of economic or another external environment.
B	The company/title (issues) bears a very high investment risk exposure. Companies/titles labelled with this symbol contain very high risk of preference to repay interests to repayment of principal. Even non-distinct variations of external environment may disturb capability of the company/issuer to repay its liabilities.

CCC	The company/title (issues) bears an extraordinarily high investment risk exposure higher than common in the sector of the company's/issuer's operation. Negative variations of external environment of any scope mean real risk of default.
CC	The company/title (issues) bears a high default risk exposure and its capability to repay its liabilities depends on distinctively positive development of the sector and industry of the operation of the company/issuer.
C	The company/title (issues) bears a very high default risk exposure. Even the positive development of the sector and industry of the company's/issuer's operation needn't mean its capability to repay liabilities in time and without unnecessary delay.
D	This symbol means that liabilities of this company/title (issues) are in default.

Source: ERA

Figure 4: Short-term rating scale

Credit assessment	Meaning of the credit assessment
S1	The company/title (issues) bears a very low investment risk. The company/titles indicated with this symbol include a high probability of capability and willingness to repay principal, interests and fixtures of an investment in time and without unnecessary delay.
S2	The company/title (issues) bears an appropriate investment risk. The company/titles indicated with this symbol include a certain risk connected with capability and willingness to repay principal, interests and fixtures of an investment in time and without unnecessary delays. However, it is probable the company/title can be threatened by more distinct variations of economic and other external environment.
S3	The company/title (issues) bears a relatively high investment risk. The company/titles indicated with this symbol include a higher risk related to capability and willingness to repay principal, interests and fixtures of an investment in time and without unnecessary delays. However, it is probable the company/title can be also threatened by less distinct variations of economic and other external environment.
S4	The company/title (issues) bears a very high investment risk. Capability of the company /issuer to repay principal, interests and fixtures of an investment in time and without unnecessary delay depends on positive development of the sector and industry of the operation of the company/issuer.
NS	The company/title (issues) will be with high probability not capable of repaying its financial liabilities in time and without unnecessary delay.

Source: ERA

Figure 5: Internal relationship between ERA's long-term and short-term rating scales

Source: assessed by the Joint Committee based on the comparison of the meaning and relative position of the rating categories

Long-term ratings scale	Short-term ratings scale
AAA	
AA	S1
A	
BBB	S2
BB	S3
B	S4
CCC	
CC	NS
C	
D	

Source: assessed by the Joint Committee based on the comparison of the meaning and relative position of the rating categories

Appendix 2: Definition of default

According to ERA, the default rating is generally assigned by ERA if the rated entity has applied for restructuring, entered into the bankruptcy filings, receivership, liquidation or other winding-up or cessation of the business. The default may also be assigned when the entity is considered insolvent due to failure to make payment of obligations under contractual terms in an extent ERA considers critical for continuation of the business.

In relation to the determination of insolvency, ERA also uses an extended set of indicators called KO criteria, which ERA evaluated as factors corresponding to defaults. If they occur and fulfill, it may endanger the ability of the rated entity to fulfill its obligations or to continue its activities. This set of KO criteria is made up of both financial and non-financial indicators, in particular:

- a) financial indicators indicating potential risk,
- b) indicators of non-standard transactions, that may result in impairment of assets of the rated entity,
- c) indicators, whose fulfillment may lead to an enforcement of supervision of the rated entity or to withdrawal of a license or other termination of the activity of the rated entity.

ERA evaluates the extent of KO criteria fulfillment and assigns rating D (default) in accordance with the rules of the valid methodology.

The default rating is generally assigned by the EUROPEAN RATNG AGENCY, a.s. if the rated entity has applied for restructuring, entered into the bankruptcy filings, receivership, liquidation or other winding-up or cessation of the business. The default may also be assigned when the entity is considered insolvent due to failure to make payment of obligations under contractual terms in an extent ERA considers critical for continuation of the business.

Source: ERA

Appendix 3: Default rates of each rating category

Figure 6: Number of rated items, with relevant weights¹¹

Date	AAA	AA	A	BBB	BB	B	CCC-C
01/01/2002	0.0	0.0	0.0	1.5	1.5	0.0	0.0
01/07/2002	0.0	0.0	0.0	1.5	1.5	0.0	0.0
01/01/2003	0.0	0.0	0.0	2.5	2.0	0.0	0.0
01/07/2003	0.0	0.0	0.0	2.5	2.0	1.0	0.0
01/01/2004	0.0	0.0	0.0	3.5	0.0	2.0	0.0
01/07/2004	0.0	0.0	0.0	4.0	0.0	1.0	0.0
01/01/2005	0.0	0.0	0.0	3.0	2.0	0.0	0.0
01/07/2005	0.0	0.0	0.0	3.5	3.5	0.0	0.0
01/01/2006	0.0	0.0	0.0	1.5	1.5	0.0	0.0
01/07/2006	0.0	0.0	0.0	1.0	0.0	0.0	0.0
01/01/2007	0.0	0.0	0.0	1.0	0.5	0.0	0.0
01/07/2007	0.0	0.0	0.0	2.0	1.0	0.0	0.0
01/01/2008	0.0	0.0	0.0	2.5	0.5	0.0	0.0
01/07/2008	0.0	0.0	0.0	2.5	0.0	0.0	0.0
01/01/2009	0.0	0.0	0.0	4.0	0.0	0.0	0.0
01/07/2009	0.0	0.0	0.0	3.5	0.0	0.0	0.0
01/01/2010	0.0	0.0	0.0	0.5	0.0	0.0	0.0
01/07/2010	0.0	0.0	0.0	0.5	0.0	0.0	0.0
01/01/2011	0.0	0.0	0.0	0.5	0.0	0.0	0.0
01/07/2011	0.0	0.0	0.0	4.0	0.0	0.0	0.0
01/01/2012	0.0	0.0	0.0	0.0	0.0	0.0	0.0
01/07/2012	0.0	0.0	0.0	0.0	0.0	0.0	0.0
01/01/2013	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Source: Joint Committee calculations based on CERP data

¹¹ Withdrawn ratings have been weighted by 50% as indicated in Article 4(3) of the ITS.

Figure 7: Number of defaulted rated items

Date	AAA	AA	A	BBB	BB	B	CCC-C
01/01/2002	0	0	0	0	0	0	0
01/07/2002	0	0	0	0	0	0	0
01/01/2003	0	0	0	0	0	0	0
01/07/2003	0	0	0	0	0	0	0
01/01/2004	0	0	0	0	0	0	0
01/07/2004	0	0	0	0	0	0	0
01/01/2005	0	0	0	0	0	0	0
01/07/2005	0	0	0	0	0	0	0
01/01/2006	0	0	0	0	0	0	0
01/07/2006	0	0	0	0	0	0	0
01/01/2007	0	0	0	0	0	0	0
01/07/2007	0	0	0	0	0	0	0
01/01/2008	0	0	0	0	0	0	0
01/07/2008	0	0	0	0	0	0	0
01/01/2009	0	0	0	0	0	0	0
01/07/2009	0	0	0	0	0	0	0
01/01/2010	0	0	0	0	0	0	0
01/07/2010	0	0	0	0	0	0	0
01/01/2011	0	0	0	0	0	0	0
01/07/2011	0	0	0	0	0	0	0
01/01/2012	0	0	0	0	0	0	0
01/07/2012	0	0	0	0	0	0	0
01/01/2013	0	0	0	0	0	0	0

Source: Joint Committee calculations based on CERP data

Figure 8: Mapping proposal for rating categories with a non-sufficient number of credit ratings

	AAA/AA	A	BBB	BB	B	CCC-C
CQS of equivalent international rating category	CQS 1	CQS 2	CQS 3	CQS 4	CQS5	CQS 6
N. observed defaulted items	0	0	0	0	0	0
Minimum N. rated items	0	0	0	0	0	n.a.
Observed N. rated items	0	0	41.5	16	4	0
Mapping proposal	CQS 1	CQS 2	CQS 3	CQS 4	CQS 5	CQS 6

Source: Joint Committee calculations based on CEREP data

Appendix 4: Mappings of each rating scale

Figure 9: Mapping of ERA's Long-term rating scale

Credit assessment	Initial mapping <i>based on LR DR</i> (CQS)	Review <i>based on SR</i> <i>DR</i> (CQS)	Final review <i>based</i> <i>on qualitative</i> <i>factors</i> (CQS)	Main reason for the mapping
AAA	1	n.a.	1	The quantitative factors are representative of the final CQS.
AA	1	n.a.	1	
A	2	n.a.	2	
BBB	3	n.a.	3	
BB	4	n.a.	4	
B	5	n.a.	5	
CCC	6	n.a.	6	
CC	6	n.a.	6	The meaning and relative position of the rating category is representative of the final CQS.
C	6	n.a.	6	
D	6	n.a.	6	

Figure 10: Mapping of ERA's Short-term rating scale

Credit assessment	Corresponding Long-term rating scale assessment (assessed by JC)	Range of CQS of corresponding Long-term rating scale	Final review based on qualitative factors (CQS)	Main reason for the mapping
S1	AAA/AA/A	1/1/2	1	
S2	BBB	3	3	The final CQS has been determined based on the most frequent step associated with the corresponding long-term credit rating category.
S3	BB	4	4	
S4	B	5	4	The final CQS has been determined based on the most frequent step associated with the corresponding long-term credit rating category. The risk weights assigned to CQS 4 to 6 are all 150%, therefore CQS 4.
NS	CCC/CC/C/D	6	4	