FITCH RATES LLOYDS' EUROPEAN INVESTMENT FIRM, TUTP17, AT 'A(EXP)'

Fitch Ratings-London-06 November 2018: Fitch Ratings has assigned TUTP17 Management GmbH an expected Long-Term Issuer Default Rating (IDR) of 'A(EXP)' with a Stable Outlook, Short-Term IDR of 'F1(EXP)' and Support Rating (SR) of '1(EXP)'.

TUTP17's Long- and Short-Term IDRs are equalised with its parent's, Lloyds Bank Corporate Markets plc (LBCM; A/Stable), which along with the SR of '1(EXP)' reflects our view of an extremely high likelihood that TUTP17 would be supported by its 100% parent, if needed. LBCM's Long-Term IDR, in turn, is equalised with the Viability Rating of Lloyds Banking Group's (LBG; A+/Stable/a), the ultimate provider of support for TUTP17 and for LBCM, in our view.

TUTP17 will be a Frankfurt-based European Investment Firm (EIF) and is expected to change its name to LBCM Wertpapierhandelsbank GmbH, pending licencing approvals from the German regulator.

TUTP17 is targeted to become fully operational by March 2019 and will focus mainly on bond origination and distribution to European Economic Area clients, activities that are currently carried out by LBCM in London. The transfer of this business to EIF is aimed at avoiding business disruption following Brexit. Fitch expects to assign final ratings to EIF once the entity becomes fully operational.

KEY RATING DRIVERS

IDRS AND SR

We have equalised the IDRs of TUTP17 and LBCM to reflect its, and LBCM's, strategic importance to LBG due to its role in providing continued access to the group's commercial banking clients to services which may not be permitted to be done from within the UK following Brexit. We consider that there would be an extremely high reputational risk to LBG if it were to allow this entity to default.

We believe that LBG would have a strong ability to provide such support given TUTP17's expected small relative size compared to the group.

Like LBCM, TUTP17's IDRs are equalised with LBG's VR as opposed to LBG's IDR to reflect insufficient certainty that senior creditors of LBCM and of its subsidiary would benefit from LBG's qualifying junior debt buffer in a resolution of the group.

Fitch has not assigned a VR to TUTP17 as we do not believe that it will have a meaningful standalone franchise without the ownership of LBG. The Short-Term IDR maps to the bank's Long-Term IDR.

RATING SENSITIVITIES

IDRS AND SR

TUTP17's expected IDRs are primarily sensitive to LBCM's and LBG's ratings. TUTP17's expected IDRs and SR are also sensitive to changes in our assumptions around the propensity or ability of LBG to provide timely support. This could result from a change to LBG's VR, or to the strategic importance of LBCM/TUTP17 within the group.

The prohibition or restriction by LBG's regulator to upstream dividends from the ring-fenced bank to support non-ring fenced entities could also result in a downgrade of TUTP17's IDRs.

Contact:
Primary Analyst
Krista Davies
Director
+44 20 3530 1579
Fitch Ratings Limited
30 North Colonnade
London E14 5GN

Secondary Analyst Marc Ellsmore Director +44 20 3530 1438

Committee Chairperson Christian Kuendig Senior Director +44 20 3530 1399

Date of relevant rating committee: 11 October 2018

Media Relations: Peter Fitzpatrick, London, Tel: +44 20 3530 1103, Email: peter.fitzpatrick@fitchratings.com.

Additional information is available on www.fitchratings.com

Applicable Criteria
Bank Rating Criteria - Effective from 22 June 2018 to 12 October 2018 (pub. 22 Jun 2018)
https://www.fitchratings.com/site/re/10034713

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. 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. 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.