
S&P Global Ratings

UPDATE (as of 29 January 2020): Brexit – Implications for Credit Ratings issued or endorsed in the EU or in the UK during and after the transition period also known as “implementation period”

The UK and EU Parliament have now ratified the Withdrawal Agreement covering the terms of the UK’s departure from the EU.

The UK will depart the EU on 31 January 2020 and enter in a transition period during which the UK and EU will negotiate their future relationships. As it stands, the transition period will conclude on 31 December 2020.

During the transition period, EU law will continue to apply in the UK. The European Securities and Markets Authority (ESMA) will continue to supervise UK-based credit rating agencies (CRAs), including the London branch of S&P Global Ratings Europe Limited (SPGRE), a Dublin-based Irish company registered with ESMA under the EU Regulation 1060/2009 as amended (EU Regulation). Additionally, any new EU legislation that takes effect before the end of the transition period will equally apply to the UK.

Currently, SPGRE conducts its operations through offices located in Dublin, London, Frankfurt, Madrid, Warsaw, Paris, Milan, Stockholm, Dubai, Johannesburg, Moscow and Riyadh. During the transition period, SPGRE will continue to conduct its UK operations through its London branch.

Under the EU Regulation and related legislation, credit ratings issued or endorsed by ESMA-registered CRAs (including through branches located inside or outside the EU) may be usable in the EU for certain regulatory purposes. As such, credit ratings issued through SPGRE’s London branch will continue to be usable in the UK and in the EU during the transition period.

After the transition period, we will register a new UK CRA, S&P Global Ratings UK Limited (SPGRUK), with the Financial Conduct Authority (FCA) to ensure that the credit ratings issued or endorsed by SPGRUK are usable for certain regulatory purposes in the UK under the Credit Rating Agencies (Amendment etc.) (EU Exit) Regulations 2019 (“UK Regulation”). Credit ratings assigned or endorsed by SPGRUK (including EU ratings issued by SPGRE) will receive respectively a “UK” or “UKE” regulatory identifiers.

In addition to their respective jurisdictions (EU and UK), ESMA and FCA have recognized the following endorsable jurisdictions: Argentina, Australia, Brazil, Canada, Hong Kong, Japan, Mexico, Singapore, and United States.

SPGRE will endorse into the EU credit ratings issued by its affiliates in endorsable jurisdictions, including credit ratings issued by SPGRUK.

Subject to satisfactory completion of testing and validation, the UK-related identifiers and associated UK references in the regulatory disclosures will be applied as soon as practicable and may be found on standardandpoors.com.

For more details about the list of S&P Global Ratings’ affiliates and endorsable jurisdictions please see Appendix I below.

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Endorsement in the European Union and in the UK of credit ratings issued by S&P Global Ratings' affiliates after the transition period

At the end of the transition period, global scale ratings¹ issued by the S&P Global Ratings' affiliates listed below will be endorsed:

- in the European Union, by S&P Global Ratings Europe Limited (SPGRE)
- in the United Kingdom, by S&P Global Ratings UK Limited (SPGRUK).

Jurisdiction	S&P Global Ratings' affiliates	EU Regulatory Identifier	UK Regulatory Identifier²
Argentina	S&P Global Ratings Argentina S.R.L., Agente de Calificacion de Riesgo	EU endorsed (EE)	UK endorsed (UKE)
Australia	S&P Global Ratings Australia Pty Ltd	EU endorsed (EE)	UK endorsed (UKE)
Brazil	Standard & Poor's Ratings do Brasil Ltda.	EU endorsed (EE)	UK endorsed (UKE)
Canada	S&P Global Ratings Canada, a business unit of S&P Global Canada Corp.	EU endorsed (EE)	UK endorsed (UKE)
European Union (Ireland)	S&P Global Ratings Europe Limited	EU issued (EU)	UK endorsed (UKE)
Hong Kong	S&P Global Ratings Hong Kong Limited	EU endorsed (EE)	UK endorsed (UKE)
Japan	S&P Global Ratings Japan Inc. and S&P Global SF Japan Inc.	EU endorsed (EE)	UK endorsed (UKE)
Mexico	S&P Global Ratings, S.A. de C.V.	EU endorsed (EE)	UK endorsed (UKE)
Singapore	S&P Global Ratings Singapore Pte. Ltd.	EU endorsed (EE)	UK endorsed (UKE)
United States	Standard & Poor's Financial Services LLC	EU endorsed (EE)	UK endorsed (UKE)
United Kingdom	S&P Global Ratings UK Limited	EU endorsed (EE)	UK issued (UK)

¹ SPGRE and SPGRUK will endorse U.S. Public Finance credit ratings issued by Standard & Poor's Financial Services LLC only upon specific request.

² The UK regulatory identifiers (UK and UKE) will be applied to credit ratings issued or endorsed by SPGRUK after the transition period. All credit ratings issued by S&P Global Ratings' affiliates listed in this table and endorsed by SPGRE will also be endorsed by SPGRUK. For technical reasons there may be a delay between the date when the transition period ends and the time the UKE identifiers will be viewable on standardandpoors.com.