# **News Release**



### Japan Credit Rating Agency, Ltd

22-D-1316 January 23, 2023

Japan Credit Rating Agency, Ltd. (JCR) announces the following credit rating.

### Nippon Life Insurance Company (security code: -)

<Affirmation>

Long-term Issuer Rating: AA+
Outlook: Stable
Ability to Pay Insurance Claims: AA+
Outlook: Stable
Foundation Fund: AA
Subordinated Loan: AACP: J-1+

#### Rationale

- (1) Nippon Life Insurance Company ("Nippon Life") is a core company of Japan's largest life insurance group, Nippon Life Group. Having Taiju Life Insurance Company Limited, Nippon Wealth Life Insurance Company Limited, HANASAKU LIFE INSURANCE Co., Ltd., MLC Limited in Australia, and other companies under its umbrella, it operates overseas insurance, asset management and other businesses in addition to domestic insurance business. JCR rates issuer rating of Nippon Life at the same level as the Group's overall creditworthiness, which reflects the strong operating base in Japan, stable earnings capacity on the back of a large amount of policies in force, high capital adequacy relative to risks, and others. Despite a considerably stressed business environment, the Group's policy performance has been relatively strong, and its earnings power has been stable. Nippon Life Group has been steadily reducing its interest rate risk, and through this risk reduction, the sensitivity of economic value-based indicators has decreased. Nippon Life Group has large capital and its strong ability to absorb various risks, including interest rate risk, has already been factored into the Group's creditworthiness.
- (2) The Group has been diversifying and specializing sales channels with the more than 50,000 sales staff as the center in order to respond to diverse customers' needs in domestic market and has become the domestic 5 company structure, including Nissay Plus SSI (small-amount, short-term insurance). In addition to strengthening bankassurance channel and agency channel, it has converted multiple independent insurance agents into its subsidiaries and reorganized them. Furthermore, it has been working on expansion of customer contact points through collaboration with companies in other business categories. In addition to efforts to generate group synergies such as group-wide product supply and service provision, it is diversifying its group businesses, including promotion of new businesses. In the overseas insurance business, MLC's performance had been declining due to the deteriorating income compensation insurance profit and other factors, but is now improving as a result of the Group's financial support and strengthened monitoring. The overseas business is expected to contribute to earnings through the strengthening of the business portfolio and other measures.
- (3) The Group's policy performance has been solid due to increased sales of foreign currency-denominated products at Taiju Life and Nippon Wealth Life, as well as effect of new products. The product mix of policies in force is changing as the Group has been reviewing its product strategy from time to time, including the introduction of new third-sector products, while curbing sales of savings products. Despite a recent surge in COVID-19 related payments and an increase in hedging costs related to foreign bond investments, the Group's core profit has remained solid. The special treatment for "deemed hospitalization" has already been revised, and the downward pressure on profit due to the claims and benefits payments is expected to be limited to the fiscal year ending March 2023.
- (4) The capital adequacy relative to risk is in line with the AA range rating, due to the accumulation of retained earnings, including various types of reserves. JCR believes that the internally controlled economic value-based capital is at a level that will allow it to maintain soundness even under considerable stress. While it is susceptible to trend of stock prices because of large balance of equity securities in the investment assets, JCR believes that the downward trend in the risk amount is expected to continue over the medium term, as efforts are being made to reduce the duration gap. Nippon Life Group has built an integrated management system for earnings and capital based on risk



management through development of ERM system and has a policy to strategically utilize capital for the expansion of the Group's business. The speed at which the environment surrounding the industry is changing is rapid, requiring flexible responses in product strategies and asset management policies, and the importance of group-wide ERM, including overseas business, is increasing.

Kiichi Sugiura, Tomohiro Miyao, and Kota Matsuzawa

### Rating

Issuer: Nippon Life Insurance Company

<Affirmation>

Long-term Issuer Rating: AA+ Outlook: Stable
Ability to Pay Insurance Claims: AA+ Outlook: Stable

Issue		ntribution nount (bn)	Execution Date	Due Date	Interest Rate	Rating
Foundation F	und	JPY 50	Aug. 3, 202	1 Aug. 3, 2026	0.280%	AA
Issue Subordinated	Amount (bn) Loan	Execut	ion Date	Repayment Date	Interest Rate	Rating
JPY 120		Sept. 1	18, 2018	(Note 1)	(Note 2)	AA-
Subordinated Loan						
	JPY 90	Apr. 2	2, 2019	(Note 3)	(Note 4)	AA-
Subordinated Loan						
	JPY 80	Nov. 2	21, 2019	(Note 5)	(Note 6)	AA-
Subordinated Loan						
	JPY 130	Sept. 2	23, 2020	(Note 7)	(Note 8)	AA-
Subordinated Loan						
	JPY 200	May 1	1, 2021	(Note 9)	(Note 10)	AA-
Subordinated	Loan					
	JPY 130	May 1	0, 2022	(Note 11)	(Note 12)	AA-
Subordinated Loan						
	JPY 71	Sept. 2	22, 2022	(Note 13)	(Note 14)	AA-

- (Note 1): 3rd banking business day prior to September 18, 2048
- (Note 2): For interest periods from loan execution to interest payment date 10 years later, 10-year yen swap rate + initial spread. For interest periods beginning on and after the interest payment date 10 years later, 5-year yen swap rate + initial spread + 1.00% step-up interest rate.
- (Note 3): 3rd banking business day prior to April 22, 2049
- (Note 4): For interest periods from loan execution to interest payment date 10 years later, 10-year yen swap rate + initial spread. For interest periods beginning on and after the interest payment date 10 years later, 5-year yen swap rate + initial spread + 1.00% step-up interest rate.
- (Note 5): 3rd banking business day prior to Nov. 21, 2049
- (Note 6): For interest periods from loan execution to interest payment date 10 years later, 10-year yen swap rate + initial spread. For interest periods beginning on and after the interest payment date 10 years later, 5-year yen swap rate + initial spread + 1.00% step-up interest rate.
- (Note 7): 3rd banking business day prior to Sept. 23, 2050
- (Note 8): Fixed rate until Sept. 23, 2030 (10-year JGB interest rate + initial spread). It will switch to 5-year JGB interest rate + initial spread + 1.00% every 5 years after Sept. 23, 2030.
- (Note 9): 3rd banking business day prior to May 11, 2051
- (Note 10): Fixed rate until May 11, 2031 (10-year JGB interest rate + initial spread). It will switch to 5-year JGB interest rate + initial spread + 1.00% every 5 years after May 11, 2031.
- (Note 11): 3rd banking business day prior to May 10, 2052
- (Note 12): Fixed interest rate of 10-year JGB interest rate + initial spread until and including May 10, 2032. 5-year JGB interest rate + initial spread + 1.00% every 5 years after that date.
- (Note 13): 3rd banking business day prior to September 28, 2052
- (Note 14): Fixed interest rate until and including September 28, 2027. 5-year JGB interest rate + certain spread from September 29, 2027 to and including September 28, 2032. 5-year JGB interest rate + certain spread + 1.00% every 5 years after that date.

CP: J-1+

Maximum: JPY 300 billion



#### Rating Assignment Date: January 18, 2023

The assumptions for the credit ratings and the definitions of the rating symbols are published as "Types of Credit Ratings and Definitions of Rating Symbols" (January 6, 2014) in Information about JCR Ratings on JCR's website (https://www.jcr.co.jp/en/).

Outline of the rating methodology is shown as "JCR's Rating Methodology" (November 7, 2014), "Life Insurance" (July 1, 2013), "Ratings on Foundation Funds of Mutual Life Insurance Companies" (August 12, 2004), "Ratings of Hybrid Securities" (September 10, 2012) and "Rating Methodology for Financial Institutions' Capital and TLAC Instruments" (April 27, 2017) in Information about JCR Ratings on JCR's website (https://www.jcr.co.jp/en/).

The rating stakeholder participated in the rating process of the aforementioned credit ratings.

### Japan Credit Rating Agency, Ltd.

Jiji Press Building, 5-15-8 Ginza, Chuo-ku, Tokyo 104-0061, Japan Tel. +81 3 3544 7013, Fax. +81 3 3544 7026

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JCR publishes its press releases regarding the rating actions both in Japanese and in English on the same day. In case that it takes time to translate rating rationale, JCR may publicize the summary version, which will be replaced by the full translated version within three business days. (Regarding Structured Finance products, JCR only publicize the summary version in English.)



### INFORMATION DISCLOSURE FORM

Japan Credit Rating Agency, Ltd.

### Disclosure Required by Paragraph (a)(1)(ii) of Rule 17g-7

Issuer:	Nippon Life Insurance Company
Rating Publication Date:	January 23, 2023

- The Symbol, Number, or Score in the Rating Scale used to Denote Credit Rating Categories and Notches and, the Identity of the Obligor or the Identity and a Description of the Security or Money Market Instrument as Required by Paragraph (a)(1)(ii)(A) of Rule 17g-7
  - Please see the news release. If the credit rating is a private rating, please see the report for private rating.
- The version of the procedure or methodology used to determine the credit rating; as Required by Paragraph (a)(1)(ii)(B) of Rule 17g-7
  - Please see the news release. If the credit rating is a private rating, please see the report for private rating.
- The Main Assumptions and Principles used in Constructing the Procedures and Methodologies used to Determine the Credit Rating as Required by Paragraph (a)(1)(ii)(C) of Rule 17g-7
  - The credit rating methodology assumes, in principle, to be applied to assess the likelihood of a given debt payment in light of its issuer's condition and business environment, etc. in the relevant future. There is certain limitation, however, in the time horizon that the rating foresees.
  - The credit rating methodology assumes, in principle, that the factors posted in the below are particularly important for such likelihood to be determined, and that the rating determination is made by evaluating each of them not only quantitatively but also employing qualitative analyses.

#### A) Business Bases

The likelihood of a given debt payment is highly conditional to its issuer's business bases - how they can be maintained/ expanded into the future and thereby secure earnings and cash flows in adequacy and in a sustainable way.

### B) Financial Grounds and Asset Quality

The likelihood of debt payment is highly dependent on the degree of the issuer's indebtedness and loss absorption capacity in terms of equity capital. Also notable is that a financial institution might see a significant loss of financial grounds as a result of changes in value of the assets under its possession.

### C) Liquidity Positions

The likelihood of debt payment is highly dependent on the adequacy of the issuer's cash and other sources of repayment (liquidity positions).



D) Related Parties' Status and Stance of Support/ Assistance for the Issuer

The likelihood of debt payment is affected one way or the other by the issuer's related parties such as parent company, subsidiary, guarantor, and the government of the issuer's business domicile, etc. - by their own conditions and/ or position of support/ assistance for the issuer.

### E) Order of Seniority in Debt Payment

The likelihood of debt payment can be different between given debts of the same issuer. The likelihood of debt payment for an individual debt is dependent on the issuer's discretion, and/ or its rank relative to other debts of the same issuer in the order of seniority in principal/ interest payment which is determined by design as financial product or by laws, etc.

- The Potential Limitations of the Credit Rating as Required by Paragraph (a)(1)(ii)(D) of Rule 17g-7
  - The credit rating herewith presented by JCR is its summary opinion with regard to the likelihood of given debt payment and hence not necessarily a perfect representation of such likelihood. The credit rating is not intended to estimate the probability of default or the loss on given default, either.
  - The objective of the credit rating herewith presented does not include any concerns other than the likelihood of debt payment, such as risks of price changes, market liquidity, etc.
  - The credit rating herewith presented is necessary to be reviewed along with possible changes of the issuer of rated objects in its business performance and/ or circumstances which include regulatory environment, and hence subject to possible alteration.
- 5 Information on the Uncertainty of the Credit Rating as Required by Paragraph (a)(1)(ii)(E) of Rule 17g-7
  - The information used for the determination of credit rating as herewith presented is obtained by JCR from the issuer of rated objects and other sources that JCR trusts in terms of accuracy and reliability but possibly contains errors due to human, non-human or other causes. Consequently, the credit rating determined on the grounds of such information does not constitute, explicitly or implicitly, any representation or warrant of JCR on the information itself or any consequences of its use in terms of accuracy, relevance, timeliness, wholeness, market value, or usefulness for any specific purposes.
- 6 Use of Due Diligence Services of a Third Party in Taking the Rating Action as Required by Paragraph (a)(1)(ii)(F) of Rule 17g-7
  - There is no use of any third-party due diligence service in the determination of the credit rating herewith presented.
- Use of Servicer or Remittance Reports to Conduct Surveillance of the Credit Rating Required by Paragraph (a)(1)(ii)(G) of Rule 17g-7
  - There is no use of any servicer or remittance report to conduct surveillance of the credit rating herewith presented.
- The Types of Data Relied Upon for the Purpose of Determining the Credit Rating as Required by Paragraph (a)(1)(ii)(H) of Rule17g-7



- The information posted in the below, which includes data, is used for the determination of the credit rating herewith presented.
  - A) Audited financial statements presented by the rating stakeholders
  - B) Explanations of business performance, management plans, etc. presented by the rating stakeholders

### 9

Overall assessment of the Quality of Information Available and Considered in Determining the Credit Rating as Required by Paragraph (a)(1)(ii)(l) of Rule 17g-7

- JCR holds its basic policies for securing the quality of information as a base of due diligence for the determination of credit ratings. The information used as a base for the determination of credit rating herewith presented satisfies such policies, which include the audit by an independent auditor, the warranty made by the issuer, the publication by the issuer, some independent media or, otherwise, JCR analyst's scrutiny, etc.
- JCR sees no particular weakness in the quality of information used for the determination of the credit rating herewith presented as compared to the information used in other cases of the credit rating for comparable issuers or ratable objects.
- · If the credit ratings is an Indication, please see the report for Indication.

### 10

Information Relating to Conflicts of Interest as Required by Paragraph (a)(1)(ii)(J) of Rule 17g-7

- JCR receives payment of compensation for the determination of the credit rating herewith presented from either one of those parties who are issuer, underwriter, depositor or sponsor.
- JCR did not receive in the last fiscal year in the past payment of compensation from the same party for any kind of JCR's service other than the determination of public or private credit rating, such as one in the ancillary business.

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Explanation or Measure of the Potential Volatility of the Credit Rating as Required by Paragraph (a)(1)(ii)(K) of Rule 17g-7

### A) Business Bases

The credit rating is subject to alteration if there is improvement or deterioration of the issuer's business bases, since its revenue, etc. may improve or deteriorate by the change in its business management policies, clients' preferences, competitive situation, or a technological innovation. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change in the business bases is large.

### B) Financial Grounds and Asset Quality

The credit rating is subject to alteration if the issuer increases/ decreases its debt/ capital or vice versa and thereby makes its individual debt payment liability less or more bearable and its loss absorption capacity into the future decreased or increased. Also, the changes in the quality of asset under the issuer's holding may affect the credit rating, since such changes could raise or lower the likelihood of future loss of the issuer's financial grounds. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change in the financial grounds and/ or asset quality is large.

### C) Liquidity Positions

The credit rating is subject to alteration if there is a change in the issuer's financial management policy or in the relations with fund procurement sources and the change thereby makes its liquidity positions improve or deteriorate. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change is large.



### D) Related Parties' Status and Stance of Support/ Assistance for the Issuer

The credit rating is subject to alteration if there is a change in the issuer's parent company or subsidiary, guarantor or other provider of credit enhancement, or the government of the issuer's business domicile, or other related parties' own conditions and/ or position of support/ assistance for the issuer, and the change thereby makes its business bases, financial grounds and/ or liquidity positions improve or deteriorate, and/ or making the effectiveness of guarantee and other credit enhancement improve or deteriorate. The resultant alteration of the credit rating is usually a notch, with possibility of a few notches if and when the change is large.

### E) Order of Seniority in Debt Payment and Non-Payment Forgiven by Contract

The credit rating is subject to alteration if there is a change in the rated debt's status in the order of seniority relative to other debts caused by the improvement/ deterioration of the issuer's financial condition. The resultant alteration of the credit rating is usually a notch, with possibility of a few notches if and when the change is large. Also, in case of the financial products for which non-payment of interest/ principal is contractually permissible, the credit rating is subject to alteration if and when the likelihood of such non-payment is projected to increase or decrease. The resultant alteration of the credit rating could be by a notch but often as much as a few notches.

### F) Rise and Fall in General Economy and Markets

The credit rating is subject to alteration if there is a rise/ fall in the general economy and/ or the markets inducing the issuer's revenues/ expenses to increase/ decrease and vice versa, etc. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change is exceptionally large.

#### G) Various Events

The credit rating is subject to alteration on occurrence of various events, such as change in the issuer's major shareholders, M&A and other organizational change, accident, violation of the law, litigation, legal/ regulatory change, natural disaster, etc., which are unforeseeable at the time when the credit rating is determined, causing a significant change on the issuer's business bases, financial grounds, etc. The resultant alteration of the credit rating could be by a notch but more often than not as much as a few notches.

Information on the Content of the Credit Rating, Including the Historical Performance of the Credit Rating and the Expected Probability of Default and the Expected Loss in the Event of Default as Required by Paragraph (a)(1)(ii)(L) of Rule 17g-7

- · Historical records of the credit rating herewith presented are posted in the end of this paper.
- The credit rating herewith presented by JCR is its summary opinion with regard to the likelihood of given debt payment and hence not necessarily a perfect representation of such likelihood. The credit rating is not intended to estimate the probability of default or the loss on given default, either.
- Facts of the probability of default are posted as Form NRSRO Exhibit 1 on the JCR website under the URL:

https://www.jcr.co.jp/en/service/company/regu/nrsro/

Information on the Sensitivity of the Credit Rating to Assumptions Made as Required by Paragraph (a)(1)(ii)(M) of Rule 17g-7

### A) Business Bases

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the issuer's business bases and powers of earning or cash flow generation, etc. The resultant change of the credit rating is most likely by a notch, as JCR speculates, but possibly as much as a few notches if the development is rapid in improvement or deterioration of the issuer's business bases on some drastic change in the operational environments, etc.

### B) Financial Grounds and Asset Quality

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the issuer's financial grounds and asset quality. The resultant change of the credit rating is most likely by a notch, as JCR speculates, but



possibly as much as a few notches if the development is rapid in improvement or deterioration of the issuer's financial grounds and/ or asset quality on some drastic change in its business bases.

### C) Liquidity Risks

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the issuer's liquidity positions. The resultant change of the credit rating is most likely by a notch, as JCR speculates, but possibly as much as a few notches if the development is rapid in improvement or deterioration of the issuer's liquidity positions on some drastic change in its financial management policy or relations with fund procurement sources, etc.

- D) Related Parties' Status and Stance of Support/ Assistance for the Issuer
  - The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the issuer's parent company or subsidiaries, guarantor or other providers of credit enhancement, the government of the issuer's business domicile or other related parties' status and stance of support/ assistance for the issuer. The resultant change of the credit rating is most likely by a notch, as JCR speculates, but possibly as much as a few notches if there is a major change on the part of related parties, such as replacement, disappearance, some drastic improvement/ deterioration of financial grounds/ balances, etc.
- E) Rise and Fall in General Economy and Markets

  The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the prospects of general economy and markets.

  JCR expects the change should be most likely by a notch but could be as much as a few notches, should the economy or the markets change so greatly.
- Information on the Representations, Warranties, and Enforcement Mechanisms of an Asset-backed Security as Required by Paragraph (a)(1)(ii)(N) of rule 17g-7
  - · The credit rating herewith presented is not for an ABS product, and hence no relevant issue.

Japan Credit Rating Agency, Ltd.

Jiji Press Building, 5-15-8 Ginza, Chuo-ku, Tokyo 104-0061, Japan
Tel. +81 3 3544 7013, Fax. +81 3 3544 7026



# The Historical Performance of the Credit Rating

Issuer Name	Issue Name	Publication Date	Rating	Outlook/Direction
		August 20, 2018	AA	Positive
Nippon Life Insurance Company	Issuer(Long-term)	December 20, 2019	AA+	Stable
Nippon Life Insurance Company	Issuer(Long-term)	January 19, 2021		
Nippon Life Insurance Company	Issuer(Long-term)		AA+	Stable
Nippon Life Insurance Company	Issuer(Long-term)	January 21, 2022	AA+	Stable
Nippon Life Insurance Company	Ability to Pay Insurance Claims	August 20, 2018	AA	Positive
Nippon Life Insurance Company	Ability to Pay Insurance Claims	December 20, 2019	AA+	Stable
Nippon Life Insurance Company	Ability to Pay Insurance Claims	January 19, 2021	AA+	Stable
Nippon Life Insurance Company	Ability to Pay Insurance Claims	January 21, 2022	AA+	Stable
Nippon Life Insurance Company	СР	June 28, 1994	J-1	
Nippon Life Insurance Company	СР	April 17, 1996	J-1+	
Nippon Life Insurance Company	СР	March 25, 1999	J-1+	
Nippon Life Insurance Company	CP	September 30, 1999	J-1+	
Nippon Life Insurance Company	CP	September 29, 2000	J-1+	
Nippon Life Insurance Company	CP	October 26, 2001	J-1+	
Nippon Life Insurance Company	CP	November 1, 2002	J-1+	
Nippon Life Insurance Company	CP	December 18, 2003	J-1+	
Nippon Life Insurance Company	CP	January 20, 2005	J-1+	
Nippon Life Insurance Company	СР	October 14, 2005	J-1+	
Nippon Life Insurance Company	СР	October 6, 2006	J-1+	
Nippon Life Insurance Company	СР	October 16, 2007	J-1+	
Nippon Life Insurance Company	СР	August 18, 2008	J-1+	
Nippon Life Insurance Company	СР	October 16, 2009	J-1+	
Nippon Life Insurance Company	СР	October 6, 2010	J-1+	
Nippon Life Insurance Company	СР	October 18, 2011	J-1+	
Nippon Life Insurance Company	СР	September 28, 2012	J-1+	
Nippon Life Insurance Company	СР	November 6, 2013	J-1+	
Nippon Life Insurance Company	СР	December 29, 2014		
Nippon Life Insurance Company	СР	December 11, 2015	J-1+	
Nippon Life Insurance Company	СР	January 27, 2017	J-1+	
Nippon Life Insurance Company	СР	December 20, 2017	J-1+	
Nippon Life Insurance Company	СР	August 20, 2018	J-1+	
Nippon Life Insurance Company	CP	December 20, 2019	J-1+	
Nippon Life Insurance Company	CP	January 19, 2021	J-1+	
Nippon Life Insurance Company	CP	January 21, 2022	J-1+	
Nippon Life Insurance Company	Fund	August 3, 2021	AA	
	Fund	January 21, 2022	AA	
Nippon Life Insurance Company				
Nippon Life Insurance Company	Loan(subordinated)	September 18, 2018		
Nippon Life Insurance Company	Loan(subordinated)	December 20, 2019	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 19, 2021	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 21, 2022	AA-	
Nippon Life Insurance Company	Loan(subordinated)	April 22, 2019	A+	
Nippon Life Insurance Company	Loan(subordinated)	December 20, 2019	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 19, 2021	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 21, 2022	AA-	
Nippon Life Insurance Company	Loan(subordinated)	November 21, 2019	A+	
Nippon Life Insurance Company	Loan(subordinated)	December 20, 2019	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 19, 2021	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 21, 2022	AA-	
Nippon Life Insurance Company	Loan(subordinated)	September 23, 2020	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 19, 2021	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 21, 2022	AA-	
Nippon Life Insurance Company	Loan(subordinated)	May 11, 2021	AA-	
Nippon Life Insurance Company	Loan(subordinated)	January 21, 2022	AA-	
Nippon Life Insurance Company	Loan(subordinated)	May 10, 2022	AA-	
Nippon Life Insurance Company	Loan(subordinated)	September 22, 2022	AA-	
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## Attestation Required by Paragraph (a)(1)(iii) of Rule 17g-7

- I, Tomohiro Miyao, have responsibility to this Rating Action and to the best of my knowledge:
- A) No part of the credit rating was influenced by any other business activities.
- B) The credit rating was based solely upon the merits of the obligor, security, or money market instrument being rated.
- C) The credit rating was an independent evaluation of the credit risk of the obligor, security, or money market instrument.

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Tomohiro Miyao

General Manager of Financial Institution Rating Department