



The Pakistan Credit Rating Agency Limited

Rating Report

Pak Elektron Limited

Report Contents

1. Rating Analysis
2. Financial Information
3. Rating Scale
4. Regulatory and Supplementary Disclosure

Rating History

Dissemination Date	Long Term Rating	Short Term Rating	Outlook	Action	Rating Watch
06-Jul-2022	A+	A1	Stable	Maintain	-
06-Jul-2021	A+	A1	Stable	Maintain	-
07-Jul-2020	A+	A1	Negative	Maintain	Yes
03-Mar-2020	A+	A1	Stable	Maintain	-
02-Sep-2019	A+	A1	Stable	Maintain	-
09-Mar-2019	A+	A1	Stable	Maintain	-
10-Sep-2018	A+	A1	Stable	Maintain	-
10-Jan-2018	A+	A1	Stable	Maintain	-
26-Apr-2017	A+	A1	Stable	Maintain	-
03-Dec-2016	A+	A1	Stable	Upgrade	-

Rating Rationale and Key Rating Drivers

Pak Elektron Limited ('PEL or 'the Company) is an eminent engineering corporation in Pakistan which manufactures major household appliances and electrical equipment. The ratings reflect PEL's diversified revenue stream and strong presence in appliances and power division including, power transformers, distribution transformers, energy meters and switch gears. Factors that shape the household appliances market are increase in technological advancements, rapid urbanization, growth in the housing sector, rise in per capita income, improved living standards, and surge in the need for comfort in household chores. In recent times, inclination of consumers toward eco-friendly & energy-efficient appliances further boost the market growth. Similarly, factors driving power division segment are linked with accelerated electricity consumption, new power projects, local industry revival, rehabilitation of power distribution networks, infrastructure developments, and new commercial/residential constructions. The emerging challenges to the growth of this market are high cost of appliances, changing customer preferences, and evolving technology. The demand for household appliances is generated from both first-hand and second-hand markets whilst power sector primarily drives its demand from new projects/orders. Barriers to market entry are high as it is dominated by well-established brands and requires extensive capital investment. The sector is primarily involved in assembling of imported parts; dependent on global raw material prices, making it susceptible to external dynamics. The 2021's growth was mainly driven by companies rearranging their operations and recovering from the COVID-19 impact. During CY21, highest production growth was recorded in air conditioners ~195% and refrigerators ~112% when compared with preceding period. Power division also followed upward trajectory where production of transformers, energy meters and switch gears showed growth of ~10.23%, ~78.98% and ~170.30%, respectively. The Company holds onto a well-thought and sustained brand positioning in home appliances segments followed by the targeted market leaders. Resultantly, the Company was able to witness significant sales growth of ~48.9% during CY2021. PEL sustained margins despite higher material costs. Coverages are on lower side due to significant quantum of borrowings. PEL's capital structure is characterized by intermediate leveraging, constituted by STBs. During Apr-22, the Company released right shares for subscription to fuel its equity base. Going forward, the management intends to materialize the envisaged strategies by partnering with foreign investors to split home appliances and power division into two independent companies. This shall benefit PEL in achieving operational efficiency, technological efficiency and real-time growth opportunities.

The ratings are dependent on the Company's ability to sustain its position and revenues amid competitive business environment. Close monitoring of working capital requirements to improve cash cycle and debt servicing remains imperative. Managing liquidity and financial risk are crucial for the ratings.

Disclosure

Name of Rated Entity	Pak Elektron Limited
Type of Relationship	Solicited
Purpose of the Rating	Entity Rating
Applicable Criteria	Methodology Corporate Rating(Jun-21),Criteria Correlation Between Long-term & Short-term Rating Scales(Jun-21),Criteria Rating Modifiers(Jun-21)
Related Research	Sector Study Household Appliances(Feb-22)
Rating Analysts	Sohail Ahmed Qureshi sohail.ahmed@pacra.com +92-42-35869504

Profile

Legal Structure Pak Elektron Limited ('PEL' or 'the Company') is a public limited company, listed on the Pakistan Stock Exchange.

Background PEL was incorporated in 1956. Saigol group acquired major shareholding in the Company in 1978, making it the flagship entity of the group. The Board of PEL and PEL Marketing (Private) Limited 'PMPL' approved the scheme of arrangement for amalgamation of PMPL, a wholly owned subsidiary of PEL, with and into PEL with effect from April 30, 2020.

Operations The Company is principally engaged in the manufacturing and sale of electrical capital goods and domestic home appliances.

Ownership

Ownership Structure Saigol Group owns shareholding in the Company (29.36%) through family members with Mr. Naseem Saigol (25.4%) holding the majority stake. Remaining shareholding is split between the general public (47.2%), insurance companies (9.0%), financial institutions (5.1%), Joint Stock Companies (3.7%), Modarabas & Mutual funds (3.4%) and others (6.2%).

Stability Ownership of the business is seen as stable since 30% of shareholding lies with Saigol family with no changes expected in near future.

Business Acumen Saigol Group is one of the leading industrial groups of the country with interests in services, manufacturing home appliances and electrical equipment, textile and power generation.

Financial Strength The Group has strong business profile with significant standing in the country's Textile, Engineering and Energy sectors.

Governance

Board Structure The Company's Board of Directors comprises seven members including the Chairman, three executive directors, two non-executive directors and one independent director. The Board has high representation of Saigol Group, with three individuals (chairman and two executive directors) belonging to the group. One independent director is a nominee of National Investment Trust.

Members' Profile All BoD members have relevant expertise. Board's Chairman, Mr. Naseem Saigol, holds directorship of various entities of Saigol Group and was an office bearer of various trade associations. Independent Director, Mr. Syed Haroon Rashid, has over twenty years of experience and has worked in various financial as well as non-financial institutions.

Board Effectiveness The Board ensures oversight through an Audit Committee and a Human Resource & Remuneration Committee. Both committees are headed by Mr. Asad Ullah Khawaja, an independent director, and nominee of NIT. Each committee comprises 3 members.

Financial Transparency M/S Rahman Sarfaraz Rahim Iqbal Rafiq & Co., Chartered Accountants, classified in category 'A' by SBP with satisfactory QCR rating, are the external auditors of the Company. The firm has expressed an unqualified opinion on the financial statements of PEL for year ended Dec 31, 2021.

Management

Organizational Structure The Company has a well-defined organizational structure, designed in-line with its two main divisions – Home Appliances and Power. Each division has separate departments for the following functions: i) Production, ii) Quality Control, iii) Research and Development, iv) Marketing, v) Supply Chain, and vi) Planning. However, Finance, IT, Human Resource and Internal Audit departments work as shared services.

Management Team The Company's management comprises of experienced individuals who possess significant market knowledge and technical know-how. Mr. Murad Saigol, the CEO, has been associated with the Company since 2005. He is supported by Mr. Zeid Yousuf Saigol who heads the power division as Director Operations.

Effectiveness Management meet on need basis to discuss the operational matters of the company. However, keeping in view the size and operations of the Company and to ensure effectiveness of the management, Company need to have formal management committees. Thus, indicating room for improvement.

MIS PEL has implemented different modules of Oracle E-business Suite to cater diversified operational and accounting needs of the Company. Oracle Financials and Oracle Supply Chain manages procurement, inventory and order booking. Oracle Discrete for manufacturing has also been implemented in both divisions. Moreover, personalized software for HR and payroll has also been deployed.

Control Environment To ensure operational efficiency, the Company has setup an internal audit function. Regular reviews are undertaken by the internal audit function.

Business Risk

Industry Dynamics Pakistan's household appliances sector is largely dependent on global raw material prices, making it susceptible to external dynamics. The household appliance sector's estimated market is of PKR~215bln in CY21 (CY20: PKR~150bln), with a YoY increase of 43%. The growth is associated with overall performance of electronics segment. Previously, the sector fell by 1% due to stringent lockdown restrictions in the country. Growth is mainly driven by companies rearranging their operations and recovering from the COVID-19 impact. This is reflected by increased production across major categories of household appliances. The highest impact was witnessed in air conditioners and refrigerators production which ramped to 195% & 112% respectively, followed by deep freezers 102% and television sets 26%. However, during the period, industry shown growth except for television sets which has declined by 39.5% YoY. On the power front, production of transformers, energy meters and switch gears showed growth of 10.23%, 78.98% and 170.30% respectively.

Relative Position PEL holds a moderate share in the overall appliance market. However, it benefits from a high market share in refrigerators and deep freezers with 24% and 22%, respectively. On the Power side, PEL is the market leader, with 100%, 24%, 22% and 77% of the market held in power & distribution transformers, energy meters and switchgears respectively.

Revenues The Company sources its revenue from two divisions, namely, Power (38%) and Home Appliances (62%). During CY21, sales clocked at PKR 42,887mln, significantly increased by 48.9% on annualized basis, (CY20: PKR 28,799mln). Revenue from the appliances division improved on account of post-pandemic prosperity wave, rapid urbanization and life style improvements. Power division's revenue registered a growth of 62.01% in CY21 due to T&D infrastructure augmentation and incremental demand from WAPDA Distribution Companies. During 1QCY22, Company revenues registered a growth of 18.1% with net revenue of PKR 12,660mln (1QCY21: 9,879mln).

Margins During CY21, gross margin slightly declined and stood at 21.1% (CY20: 22.2%). This is attributable to high raw material costs aggravated by rupee devaluation. The Company largely passed on costs to the consumers. Operating profit has improved to 10.6% in CY21 from 9.0% in CY20. The Company posted a net profit of PKR 1,591mln in CY21 (CY20: PKR 224mln). Gross and net margins of the Company in 1QCY22 were recorded at 20.0% and 2.5%, respectively.

Sustainability Going forward, the Company is expected to benefit from Government industrialization efforts including privileges given to construction sector. Demand of company's home appliances division products will increase with the growing disposable incomes and power division products demand will grow, with the increasing constructions both at housing & commercial levels.

Financial Risk

Working Capital During CY21, PEL's gross working capital days decreased to 189 days from 235 days. The Company's average receivables were recorded at 104 days (CY20: 125 days). Net working capital cycle significantly reduced to 185 days from 228 days. During 1QCY22, net working capital days were recorded at 181 days same as recorded in 1QCY21. Working capital position is supported by a healthy cushion to borrow additional funds.

Coverages Improved profitability led to better free cash flow from operations (FCFO) during CY21 and was clocked at PKR 4,374 as compared to PKR 2,631mln during preceding year. Resultantly, interest coverages have improved (CY21: 2.4x, CY20: 1.3x, CY19: 1.7x). Similarly, core and total coverage also improved (CY21: 1.0x, CY20: 0.6x, CY19: 0.8x). During 1QCY22, interest coverage and debt coverage stood at 2.0x and 0.7x respectively.

Capitalization The Company's capital structure comprises a debt-to-equity ratio of 36.9% during 1QCY22 (CY21: 37.3%, CY20: 37.9%). Total borrowings witnessed a hike on back of rise in long term borrowings. Total debt is still dominated by short-term borrowings, representing 58%. During Nov-21, the Company issued a privately placed Sukuk of PKR 1,500mln and during Feb-22, an unsecured commercial paper of PKR 1,200mln was issued to finance the working capital requirements.



Pak Elektron Limited Household Appliances	Mar-22 3M	Dec-21 12M	Dec-20 12M	Dec-19 12M
A BALANCE SHEET				
1 Non-Current Assets	26,355	25,595	25,496	24,836
2 Investments	32	33	32	22
3 Related Party Exposure	12	14	11	6
4 Current Assets	35,606	34,172	29,254	26,447
<i>a Inventories</i>	12,191	10,465	9,499	7,794
<i>b Trade Receivables</i>	13,891	13,966	10,436	9,318
5 Total Assets	62,005	59,813	54,793	51,311
6 Current Liabilities	2,028	1,859	1,931	1,708
<i>a Trade Payables</i>	181	185	656	469
7 Borrowings	21,109	20,558	19,066	16,054
8 Related Party Exposure	-	-	-	-
9 Non-Current Liabilities	2,718	2,819	2,531	3,311
10 Net Assets	36,149	34,577	31,265	30,239
11 Shareholders' Equity	36,149	34,577	31,265	30,239
B INCOME STATEMENT				
1 Sales	12,660	42,887	28,799	27,900
<i>a Cost of Good Sold</i>	(10,123)	(33,820)	(22,398)	(21,327)
2 Gross Profit	2,537	9,068	6,402	6,573
<i>a Operating Expenses</i>	(1,394)	(4,505)	(3,804)	(3,191)
3 Operating Profit	1,143	4,563	2,598	3,382
<i>a Non Operating Income or (Expense)</i>	(35)	(183)	(44)	(21)
4 Profit or (Loss) before Interest and Tax	1,108	4,380	2,554	3,361
<i>a Total Finance Cost</i>	(668)	(2,174)	(2,198)	(2,480)
<i>b Taxation</i>	(127)	(615)	(132)	(2)
6 Net Income Or (Loss)	312	1,591	224	879
C CASH FLOW STATEMENT				
<i>a Free Cash Flows from Operations (FCFO)</i>	1,131	4,374	2,631	3,868
<i>b Net Cash from Operating Activities before Working Capital Changes</i>	780	2,509	938	1,737
<i>c Changes in Working Capital</i>	(1,459)	(2,966)	(471)	2,023
1 Net Cash provided by Operating Activities	(679)	(457)	466	3,760
2 Net Cash (Used in) or Available From Investing Activities	(1,064)	(2,688)	(3,230)	(1,905)
3 Net Cash (Used in) or Available From Financing Activities	1,811	3,171	2,780	(1,812)
4 Net Cash generated or (Used) during the period	68	27	16	43
D RATIO ANALYSIS				
1 Performance				
<i>a Sales Growth (for the period)</i>	18.1%	48.9%	3.2%	-1.9%
<i>b Gross Profit Margin</i>	20.0%	21.1%	22.2%	23.6%
<i>c Net Profit Margin</i>	2.5%	3.7%	0.8%	3.1%
<i>d Cash Conversion Efficiency (FCFO adjusted for Working Capital/Sales)</i>	-2.6%	3.3%	7.5%	21.1%
<i>e Return on Equity [Net Profit Margin * Asset Turnover * (Total Assets/Sh</i>	3.5%	4.8%	0.7%	2.9%
2 Working Capital Management				
<i>a Gross Working Capital (Average Days)</i>	182	189	235	249
<i>b Net Working Capital (Average Days)</i>	181	185	228	243
<i>c Current Ratio (Current Assets / Current Liabilities)</i>	17.6	18.4	15.2	15.5
3 Coverages				
<i>a EBITDA / Finance Cost</i>	2.3	2.9	1.8	1.9
<i>b FCFO / Finance Cost+CMLTB+Excess STB</i>	0.7	1.0	0.6	0.8
<i>c Debt Payback (Total Borrowings+Excess STB) / (FCFO-Finance Cost)</i>	3.8	3.9	13.6	3.1
4 Capital Structure				
<i>a Total Borrowings / (Total Borrowings+Shareholders' Equity)</i>	36.9%	37.3%	37.9%	34.7%
<i>b Interest or Markup Payable (Days)</i>	90.7	69.9	67.7	80.2
<i>c Entity Average Borrowing Rate</i>	11.1%	9.2%	11.2%	13.3%

Credit Rating

Credit rating reflects forward-looking opinion on credit worthiness of underlying entity or instrument; more specifically it covers relative ability to honor financial obligations. The primary factor being captured on the rating scale is relative likelihood of default.

Scale	Long-term Rating Definition
AAA	Highest credit quality. Lowest expectation of credit risk. Indicate exceptionally strong capacity for timely payment of financial commitments
AA+	
AA	Very high credit quality. Very low expectation of credit risk. Indicate very strong capacity for timely payment of financial commitments. This capacity is not significantly vulnerable to foreseeable events.
AA-	
A+	
A	High credit quality. Low expectation of credit risk. The capacity for timely payment of financial commitments is considered strong. This capacity may, nevertheless, be vulnerable to changes in circumstances or in economic conditions.
A-	
BBB+	
BBB	Good credit quality. Currently a low expectation of credit risk. The capacity for timely payment of financial commitments is considered adequate, but adverse changes in circumstances and in economic conditions are more likely to impair this capacity.
BBB-	
BB+	Moderate risk. Possibility of credit risk developing. There is a possibility of credit risk developing, particularly as a result of adverse economic or business changes over time; however, business or financial alternatives may be available to allow financial commitments to be met.
BB	
BB-	
B+	
B	High credit risk. A limited margin of safety remains against credit risk. Financial commitments are currently being met; however, capacity for continued payment is contingent upon a sustained, favorable business and economic environment.
B-	
CCC	
CC	Very high credit risk. Substantial credit risk “CCC” Default is a real possibility. Capacity for meeting financial commitments is solely reliant upon sustained, favorable business or economic developments. “CC” Rating indicates that default of some kind appears probable. “C” Ratings signal imminent default.
C	
D	Obligations are currently in default.

Scale	Short-term Rating Definition
A1+	The highest capacity for timely repayment.
A1	A strong capacity for timely repayment.
A2	A satisfactory capacity for timely repayment. This may be susceptible to adverse changes in business, economic, or financial conditions.
A3	An adequate capacity for timely repayment. Such capacity is susceptible to adverse changes in business, economic, or financial conditions.
A4	The capacity for timely repayment is more susceptible to adverse changes in business, economic, or financial conditions. Liquidity may not be sufficient.



**The correlation shown is indicative and, in certain cases, may not hold.*

Outlook (Stable, Positive, Negative, Developing) Indicates the potential and direction of a rating over the intermediate term in response to trends in economic and/or fundamental business/financial conditions. It is not necessarily a precursor to a rating change. ‘Stable’ outlook means a rating is not likely to change. ‘Positive’ means it may be raised. ‘Negative’ means it may be lowered. Where the trends have conflicting elements, the outlook may be described as ‘Developing’.

Rating Watch Alerts to the possibility of a rating change subsequent to, or, in anticipation of some material identifiable event with indeterminable rating implications. But it does not mean that a rating change is inevitable. A watch should be resolved within foreseeable future, but may continue if underlying circumstances are not settled. Rating watch may accompany rating outlook of the respective opinion.

Suspension It is not possible to update an opinion due to lack of requisite information. Opinion should be resumed in foreseeable future. However, if this does not happen within six (6) months, the rating should be considered withdrawn.

Withdrawn A rating is withdrawn on a) termination of rating mandate, b) the debt instrument is redeemed, c) the rating remains suspended for six months, d) the entity/issuer defaults., or/and e) PACRA finds it impractical to surveil the opinion due to lack of requisite information.

Harmonization A change in rating due to revision in applicable methodology or underlying scale.

Surveillance. Surveillance on a publicly disseminated rating opinion is carried out on an ongoing basis till it is formally suspended or withdrawn. A comprehensive surveillance of rating opinion is carried out at least once every six months. However, a rating opinion may be reviewed in the intervening period if it is necessitated by any material happening.

Note. This scale is applicable to the following methodology(s):

<p>Entities</p> <ul style="list-style-type: none"> a) Broker Entity Rating b) Corporate Rating c) Financial Institution Rating d) Holding Company Rating e) Independent Power Producer Rating f) Microfinance Institution Rating g) Non-Banking Finance Companies (NBFCs) Rating 	<p>Instruments</p> <ul style="list-style-type: none"> a) Basel III Compliant Debt Instrument Rating b) Debt Instrument Rating c) Sukuk Rating
--	---

Disclaimer: PACRA has used due care in preparation of this document. Our information has been obtained from sources we consider to be reliable but its accuracy or completeness is not guaranteed. PACRA shall owe no liability whatsoever to any loss or damage caused by or resulting from any error in such information. Contents of PACRA documents may be used, with due care and in the right context, with credit to PACRA. Our reports and ratings constitute opinions, not recommendations to buy or to sell.

Rating Team Statements

(1) Rating is just an opinion about the creditworthiness of the entity and does not constitute recommendation to buy, hold or sell any security of the entity rated or to buy, hold or sell the security rated, as the case may be | Chapter III; 14-3-(x)

2) Conflict of Interest

- i. The Rating Team or any of their family members have no interest in this rating | Chapter III; 12-2-(j)
- ii. PACRA, the analysts involved in the rating process and members of its rating committee, and their family members, do not have any conflict of interest relating to the rating done by them | Chapter III; 12-2-(e) & (k)
- iii. The analyst is not a substantial shareholder of the customer being rated by PACRA [Annexure F; d-(ii)] Explanation: for the purpose of above clause, the term "family members" shall include only those family members who are dependent on the analyst and members of the rating committee

Restrictions

- (3) No director, officer or employee of PACRA communicates the information, acquired by him for use for rating purposes, to any other person except where required under law to do so. | Chapter III; 10-(5)
- (4) PACRA does not disclose or discuss with outside parties or make improper use of the non-public information which has come to its knowledge during business relationship with the customer | Chapter III; 10-7-(d)
- (5) PACRA does not make proposals or recommendations regarding the activities of rated entities that could impact a credit rating of entity subject to rating | Chapter III; 10-7-(k)

Conduct of Business

- (6) PACRA fulfills its obligations in a fair, efficient, transparent and ethical manner and renders high standards of services in performing its functions and obligations; | Chapter III; 11-A-(a)
- (7) PACRA uses due care in preparation of this Rating Report. Our information has been obtained from sources we consider to be reliable but its accuracy or completeness is not guaranteed. PACRA does not, in every instance, independently verifies or validates information received in the rating process or in preparing this Rating Report | Clause 11-(A)(p).
- (8) PACRA prohibits its employees and analysts from soliciting money, gifts or favors from anyone with whom PACRA conducts business | Chapter III; 11-A-(q)
- (9) PACRA ensures before commencement of the rating process that an analyst or employee has not had a recent employment or other significant business or personal relationship with the rated entity that may cause or may be perceived as causing a conflict of interest; | Chapter III; 11-A-(r)
- (10) PACRA maintains principal of integrity in seeking rating business | Chapter III; 11-A-(u)
- (11) PACRA promptly investigates, in the event of a misconduct or a breach of the policies, procedures and controls, and takes appropriate steps to rectify any weaknesses to prevent any recurrence along with suitable punitive action against the responsible employee(s) | Chapter III; 11-B-(m)

Independence & Conflict of interest

- (12) PACRA receives compensation from the entity being rated or any third party for the rating services it offers. The receipt of this compensation has no influence on PACRA's opinions or other analytical processes. In all instances, PACRA is committed to preserving the objectivity, integrity and independence of its ratings. Our relationship is governed by two distinct mandates i) rating mandate - signed with the entity being rated or issuer of the debt instrument, and fee mandate - signed with the payer, which can be different from the entity
- (13) PACRA does not provide consultancy/advisory services or other services to any of its customers or to any of its customers' associated companies and associated undertakings that is being rated or has been rated by it during the preceding three years unless it has adequate mechanism in place ensuring that provision of such services does not lead to a conflict of interest situation with its rating activities; | Chapter III; 12-2-(d)
- (14) PACRA discloses that no shareholder directly or indirectly holding 10% or more of the share capital of PACRA also holds directly or indirectly 10% or more of the share capital of the entity which is subject to rating or the entity which issued the instrument subject to rating by PACRA; | Reference Chapter III; 12-2-(f)
- (15) PACRA ensures that the rating assigned to an entity or instrument is not be affected by the existence of a business relationship between PACRA and the entity or any other party, or the non-existence of such a relationship | Chapter III; 12-2-(i)
- (16) PACRA ensures that the analysts or any of their family members shall not buy or sell or engage in any transaction in any security which falls in the analyst's area of primary analytical responsibility. This clause shall, however, not be applicable on investment in securities through collective investment schemes. | Chapter III; 12-2-(l)
- (17) PACRA has established policies and procedure governing investments and trading in securities by its employees and for monitoring the same to prevent insider trading, market manipulation or any other market abuse | Chapter III; 11-B-(g)

Monitoring and review

- (18) PACRA monitors all the outstanding ratings continuously and any potential change therein due to any event associated with the issuer, the security arrangement, the industry etc., is disseminated to the market, immediately and in effective manner, after appropriate consultation with the entity/issuer; | Chapter III | 18-(a)
- (19) PACRA reviews all the outstanding ratings on semi-annual basis or as and when required by any creditor or upon the occurrence of such an event which requires to do so; | Chapter III | 18-(b)
- (20) PACRA initiates immediate review of the outstanding rating upon becoming aware of any information that may reasonably be expected to result in downgrading of the rating; | Chapter III | 18-(c)
- (21) PACRA engages with the issuer and the debt securities trustee, to remain updated on all information pertaining to the rating of the entity/instrument; | Chapter III | 18-(d)

Probability of Default

(22) PACRA's Rating Scale reflects the expectation of credit risk. The highest rating has the lowest relative likelihood of default (i.e, probability). PACRA's transition studies capture the historical performance behavior of a specific rating notch. Transition behavior of the assigned rating can be obtained from PACRA's Transition Study available at our website. (www.pacra.com). However, actual transition of rating may not follow the pattern observed in the past | Chapter III | 14-(F-VII)

Proprietary Information

(23) All information contained herein is considered proprietary by PACRA. Hence, none of the information in this document can be copied or, otherwise reproduced, stored or disseminated in whole or in part in any form or by any means whatsoever by any person without PACRA's prior written consent