

Pension Perspectives: Q4 2012

Lifting the lid on discount rate calculations

- Pensions
- Quarterly

- **Discount rate divergence** — Companies used a wider range of pension discount rates in 2011, and we expect this to continue in 2012 annual reports. This reduces comparability of reported pension liabilities, which are highly sensitive to discount rate assumptions. Falling discount rates are driving pension liabilities higher, raising concerns that the low yields reflect technical factors (eg few bonds in relevant indices). The IFRS Interpretations Committee is considering whether companies should be permitted to reference single-A corporate bonds given the shortage of Eurozone AA bonds; this could provide some relief from the very low AA yields.
- **Funding stable in Q4** — UK and European IFRS pension funding levels were broadly unchanged in Q4, with FTSE 350 schemes 91% funded on average, and Stoxx 50 schemes 56% funded. Increases in assets were offset by a continuing fall in AA corporate bond yields (increasing liabilities).
- **UK pension funding consultation** — The UK government has initiated two consultations which could result in lower funding requirements for UK pension schemes. The consultations will consider whether asset and liability values should be smoothed in funding deficit calculations, and if the affordability of deficit recovery plans for companies should be explicitly considered by the regulator. Other countries (eg US, Netherlands) introduced measures to reduce funding pressure in 2012, but the UK regulator has previously dismissed calls to soften UK rules.
- **Invensys disposal to improve pension funding** — Invensys announced the sale of its Rail division to Siemens for £1.7bn, with a one-off contribution of £400m into its UK pension scheme, together with a contingent payment of £225m. While the pension funding position has been improved and no deficit recovery payments will now be needed until 2018, it does not materially reduce the company's pension risk (in our view), as this is driven more by the scheme size.
- **Deutsche Post issues debt to fund pension** — Deutsche Post has followed a number of US companies in issuing debt in order to fund pension contributions. The company cited favourable market conditions, and has raised €2bn through a €1bn convertible bond and €1bn of other bonds. The debt issuance reduces ongoing pension contributions and increases security for the company's German pension scheme members, but essentially replaces one form of debt with another.
- **Most exposed** — We update our screens for corporate pension exposure, highlighting those companies most exposed to pension risk in Japan and the USA as well as in the UK and Europe. Most exposed UK and European companies include Fiat (pension liabilities 461% of market cap), IAG (422%), FirstGroup (419%), Go Ahead Group (335%), and BT Group (213%).

Neil Dawson
+44-20-7986-7987
neil.dawson@citi.com

Sarah Deans
+44-20-7986-4156
sarah.deans@citi.com

See Appendix A-1 for Analyst Certification, Important Disclosures and non-US research analyst disclosures.

Citi Research is a division of Citigroup Global Markets Inc. (the "Firm"), which does and seeks to do business with companies covered in its research reports. As a result, investors should be aware that the Firm may have a conflict of interest that could affect the objectivity of this report. Investors should consider this report as only a single factor in making their investment decision.

Contents

Pension funding levels unchanged in Q4	3
Lifting the lid on discount rate calculations	5
Other Pension Developments	8
UK consultations could provide pension funding relief	8
Invensys to use division disposal proceeds to fund UK deficit	9
Deutsche Post issues debt to fund pension scheme	9
Corporate pension exposure screens	11
UK – FTSE 350	12
Europe – MSCI Europe ex UK	14
USA – S&P 500	15
Japan – Nikkei 225	16
Appendix A-1	19

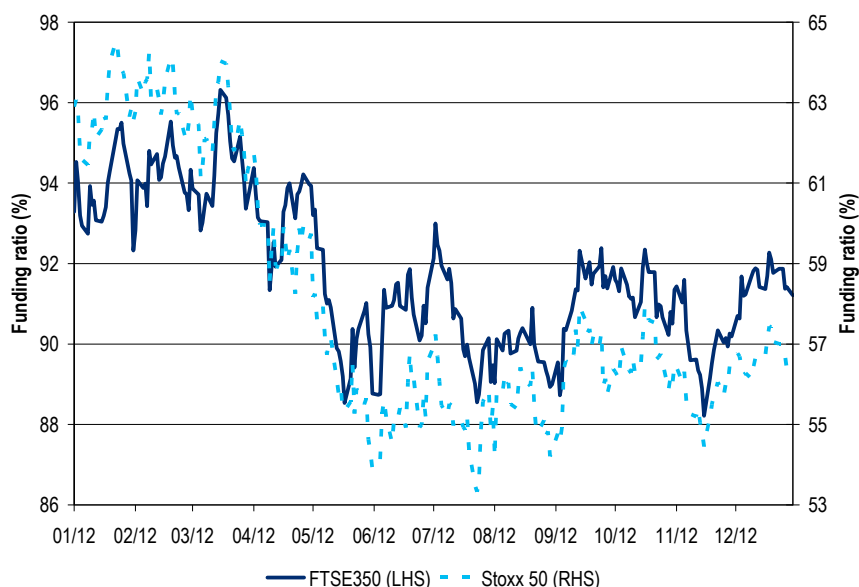
Pension funding levels unchanged in Q4

**FTSE 350 pension schemes 91% funded,
Stoxx 50 schemes 56% funded**

The FTSE 350 and Stoxx 50 funding ratios did not change meaningfully during Q4, according to actuarial firm Hewitt. During Q4, FTSE 350 pension schemes funding remained at 91% on an IAS 19 basis, but were down from 94% at the end of 2011. The Stoxx 50 funding ratio ended 2012 at 56%, also unchanged during Q4, but down by 9% since the end of 2011.

Hewitt uses “indicative AA corporate bond yields” as discount rate for estimates of FTSE 350 liabilities and the iBoxx European AA corporates 10+ years index for the discount rate on Stoxx 50 liabilities. As we discuss from page 5, some companies are moving to apply a different methodology for calculating discount rates, and the IFRS Interpretations Committee has been asked to consider whether companies should be permitted to consider single-A bond yields, due a shortage of suitable AA bonds (particularly in the Eurozone). Therefore, the average change in pension liabilities and deficits reported by companies may differ from the Hewitt figures.

Figure 1. FTSE 350 and Stoxx 50 funding ratios were unchanged in Q4, but fell in 2012



Source: Hewitt, Citi Research. Note: funding level defined as assets/liabilities. Stoxx 50 funding ratio lower on absolute basis due to prevalence of unfunded pension schemes in some European countries.

UK – FTSE 350

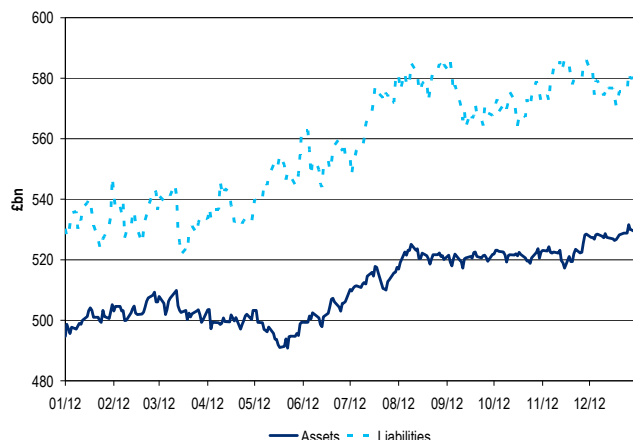
**FTSE 350 pension deficit of £51bn at end
2012**

In the UK, FTSE 350 pension assets rose by 7% in 2012, reaching £529bn, while pension liabilities rose by 9% to reach £580bn, as shown in Figure 2. This leaves a FTSE 350 deficit at end 2012 of £51bn, up by £15bn since the start of the year.

High grade sterling bond yields rose slightly in Q4, from 4.02% to 4.07% (Figure 3). The Q4 trend has continued into 2013, with the iBoxx index yield rising to 4.20%. According to KPMG, the median UK discount rate assumption among KPMG clients at 31 December 2012 is 4.4%, with a range of between 4.1% and 4.7%. This represents a 40bps fall in median discount rates compared to 31 December 2011. The median is approximately 30bps above the iBoxx level, which in part represents the duration mismatch between iBoxx (duration of 13.75 years at 31 December) and the average pension scheme liability duration of c.20 years, and does not appear

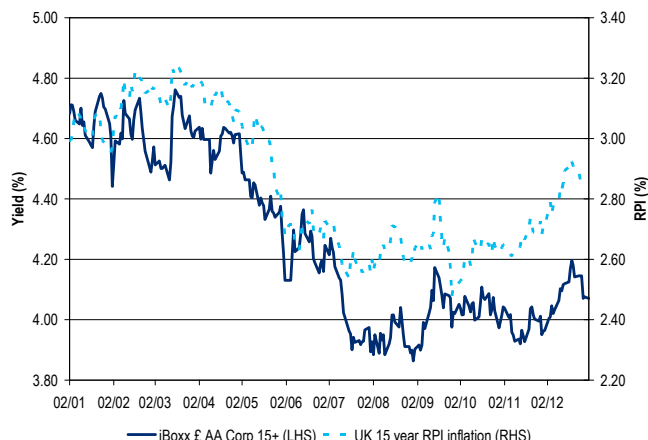
unreasonable based on the published relevant yield curve (the longest duration sterling corporate AA index published by iBoxx is 15+ years).

Figure 2. FTSE 350 pension assets and liabilities both rose in 2012...



Source: Hewitt

Figure 3. ...but liabilities grew faster as discount rates fell



Source: DataStream, Bank of England

Long-run RPI inflation rates also rose in Q4, from 2.51% to 2.84% (Bank of England data). Like discount rates, implied RPI inflation has also jumped in 2013 so far, reaching 3.20%. This is largely driven by the UK government decision not to change the calculation of RPI, although we do not expect companies to factor this change into calculations as of 31 December (see page 10). According to KPMG, the median RPI inflation assumption at 31 December is 2.9%, with a median spread between RPI and CPI of 70bps (implying median CPI of 2.2%).

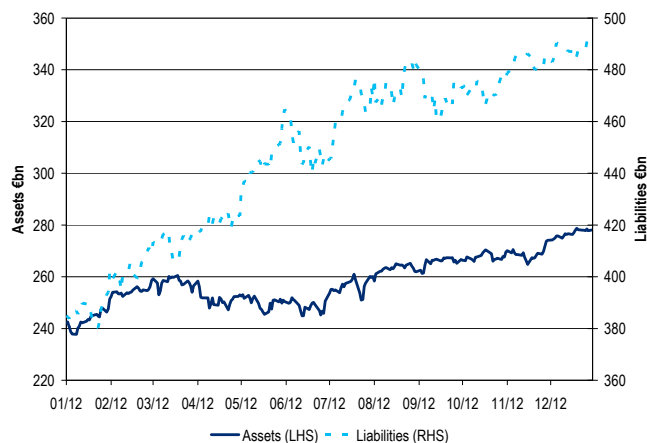
Europe – Stoxx 50

Stoxx 50 deficit reached €215bn by end 2012

Stoxx 50 pension liabilities rose a further 4% in Q4, reaching €439bn, according to Hewitt. Pension assets were €278bn, meaning that the Stoxx 50 deficit reached €215bn, up €4bn in the quarter. Despite strong asset returns (Stoxx 50 pension assets rose by 15% in 2012), the funding position of Eurozone pension schemes deteriorated in 2012, as pension liabilities rose an estimated 34% during the year.

The iBoxx Euro AA corporate bond index yield kept falling during Q4 2012, from 2.91% to 2.69%. It remains questionable whether companies will follow the index closely given a fall of 191bps (from 4.60%) in 2012, due to concerns about the reliability of the relevant Eurozone bond indices. The IFRS Interpretations Committee has been asked to consider whether IFRS rules should be changed to permit a wider range of bonds to be incorporated into discount rate calculations (see page 6). However, our analysis below suggests that some companies do continue to refer to the benchmark index yields, and we have seen some companies report low discount rates in recent annual reports. For example, Siemens disclosed a discount rate for Germany (€) of 3.1% as at 30 September 2012, compared to an iBoxx index yield of 2.9% on the same date.

Figure 4. Stoxx 50 liabilities grew much faster than assets in 2012



Source: Hewitt

Figure 5. Euro AA corporate bond yields have fallen below 3%



Source: DataStream. Index: iBoxx € AA corporate 10+

Lifting the lid on discount rate calculations

Discount rate estimation has become a bigger issue as yields have fallen

In recent years long duration, high quality corporate bond yields have fallen significantly, and as a result the value of pension liabilities (and deficits) has risen. At the same time, the number of bonds from which to generate indices for calculating pension discount rates has fallen. As a result, companies have begun to change the way that pension discount rates are calculated, making greater use of curve fitting and extrapolation techniques to derive appropriate discount rates. At the same time, there have been numerous calls for changes to be made to IFRS to permit a wider population of bonds to be referenced when calculating discount rates.

IFRS (as well as US GAAP and Japanese GAAP) requires companies to determine the pension liability discount rate with reference to market yields on high quality corporate bonds. The currency and term of the bonds must be consistent with the currency and estimated term of the pension liabilities. If there is no sufficiently deep market for appropriate corporate bonds, companies must refer to market yields on government bonds. The valuation of pension liabilities is sensitive to discount rates, and we calculate (based on the latest available annual reports) that a 10bps fall in the discount rate increases pension liabilities by 1.6% on average.

IFRS not prescriptive on which bonds should be used for discount rates

The term “high quality corporate bonds” has been generally taken to mean bonds rated AA, while IFRS does not contain any specific guidance on the range of bonds which should be referred to. In the US, SEC guidance which forms part of US GAAP states that bonds rated AA or higher should be used. Specific guidance was also a feature in some legacy European accounting standards which were superseded by IFRS. For example, UK GAAP stipulates that AA bonds be referenced.

Methods for calculating discount rates

Traditionally, many companies have made use of public indices (such as those published by iBoxx) when selecting discount rates, and companies (particularly UK) have disclosed discount rate assumptions within a fairly tight range. For example, in 2010 the average variation between UK company assumptions and the relevant iBoxx index was 6bps.

In recent years, some companies have revised the method applied (we highlighted disclosures by BT in this regard in the Q2 [Pension Perspectives](#)). From discussions with industry consultants it appears that some companies began to move toward using a yield curve methodology in 2007/08.

Emerging 'yield curve' methodology involves discounting liabilities using derived AA curve

The 'yield curve approach' involves a number of steps:

1. Start with either a published yield curve or a curve derived from a population of appropriate bonds
2. Apply curve fitting methods beyond the maturity of the last liquid bonds to extend the curve to cover the necessary maturity
3. Model the expected scheme cash flows (ie benefit payments)
4. Discount each cash flow using the calculated yields to determine the present value
5. Determine the weighted average discount rate (ie the single rate which discounts the cash flows to the present value)

More judgement in applying yield curve approach

The key difference between the index based approach and the yield curve approach is that the yield curve approach requires more judgement. For example, there are a number of areas where different (but equally valid) decisions could be reached when building a pension discount rate yield curve:

- Whether to include bonds rated AAA, AA+ and AA-
- Which rating agencies to follow (the SEC guidance refers to Moody's as an example), and how many AA ratings to require (eg two from Moody's, S&P, and Fitch)
- Whether to include non-standard bonds (eg convertibles, callables/puttables, etc)
- Inclusion of collateralised bonds
- Whether to include all bonds or to strip out yield outliers
- Whether to include smaller issues (eg iBoxx requires a minimum of £250m/€500m of bonds outstanding for index inclusion, whereas other indices have lower thresholds).

There are also other differences in possible methodology eg what duration to begin extrapolation (market yields generally used up to between 20 and 30 years), and which statistical method to use when extrapolating long end yields.

Call for more IFRS guidance on definition of 'high quality'

The number of eligible bonds has been falling in recent years, particularly long duration bonds. The main driver of this has been issuer downgrades, with relatively few AA (or better) corporate bonds remaining, particularly Euro denominated. Within the iBoxx Euro AA corporate 10+ years index nine bonds remain, from only seven issuers.

IFRS Interpretations Committee asked to clarify which bonds should be used for discount rates

In response to this, alongside the sharp fall in the relevant bond yields, there have been calls for changes to IFRS to alleviate the impact of lower bond yields on the valuation of pension liabilities (and therefore deficits).

Specifically, the IFRS Interpretations Committee (IFRIC) has been petitioned by the German national accounting body (the Accounting Standards Committee of Germany) to permit the use of single-A bonds in calculating pension discount rates under IFRS.

The IFRIC discussed this proposition in November, and is scheduled to discuss further in the next IFRIC meeting later this month. IFRIC noted that IAS 19 does not specify which bonds to use, and therefore it is a question of judgement as to the population referred to. A staff paper prepared ahead of the January IFRIC meeting proposes permitting reference to single-A bonds when there is not a sufficiently deep market for AA bonds, with a credit risk adjustment made to the yield of single-A instruments to adjust for the perceived additional credit risk. This could also impact on companies referring to government bonds at present (as companies would be required to use single-A bonds ahead of government bonds if available).

Unclear if IFRIC will issue guidance; meet later this month

The calculation of discount rates is a contentious area, and the IASB's previous work in this area (the Board initiated a project in 2009) did not result in any change. It therefore appears somewhat doubtful that IFRIC will agree on a solution, at least in the short term.

Current practice

Perhaps unsurprisingly, given the absence of detailed guidance in IFRS, current company practice does not appear uniform. Unfortunately, many companies provide relatively limited information on the calculation of discount rates (aside from including boilerplate extracts from IAS 19).

Lack of clear disclosure over techniques applied by companies

We surveyed the most exposed UK European companies (the top 50 in the UK and the top 50 in mainland Europe, ranked by pension liabilities against market cap) to assess which techniques were being applied. Our discussions with IASB staff suggested that some companies may already be referring to single-A bonds when calculating discount rates, but we did not see any evidence of this in the (2011/12) annual reports we reviewed, and the IFRIC committee was clear that companies should provide details of any change in the methodology applied. By and large there were three types of approach discussed:

- Some companies do not yet appear to have adopted the new yield curve methodology, with 11 companies specifically referring to the use of external indices. These were ArcelorMittal, BAE Systems, Capgemini, Dairy Crest, Electrolux, GKN, Lafarge, Philips, Sainsbury, Thales, and Veolia.
- Nine companies referred specifically to the use of a yield curve methodology. These were AXA, Barclays, BT Group, DE Master Blenders, Howdens, KPN, Michelin, Phoenix Group, and Zurich Insurance.
- The other 80 companies reviewed either did not disclose a method for calculating the pension discount rate or included only generic references to IAS 19, making it difficult to ascertain the actual approach taken.

Overall, it is difficult to assess the extent to which companies have changed their calculation of pension discount rates in recent years, or the amount of companies which have adopted a yield curve methodology.

Conclusions and future implications

In general, we expect that companies will continue to report a relatively wide range of pension discount rate assumptions, given that the iBoxx indices fell considerably in 2012. We do not expect the IASB/IFRIC to provide formal guidance in the near term (certainly not in time for 2012 reporting), and it remains to be seen if the IFRIC will commit to publishing any new guidance.

Pensions a 2012 reporting priority for European markets regulator

The European Securities and Markets Regulator (ESMA) made pension liability measurement one of its key enforcement priorities for 2012 annual reports (as we discussed in [The Standards](#), 5 December). Specifically, ESMA noted that companies should not change the discount rate calculation methodology in anticipation of a decision from IFRIC, and that there is “a particular need for transparency” in disclosing how discount rates are calculated.

As we noted above, discount rates are a key input into pension liability valuation. Given the disparities in practice, we think that investors should be cautious when comparing companies’ reported pension deficits, and should consider the discount rates applied and the justification for these rates.

Other Pension Developments

UK consultations could provide pension funding relief

Two consultations to focus on UK pension funding

In the Autumn Statement published in December 2012¹, the UK Chancellor initiated two consultations which could be positive for companies with large UK pension schemes. Firstly, whether the UK Pensions Regulator should be required to consider the long-term affordability of deficit recovery plans to companies; and secondly if companies undergoing valuations in 2013 and beyond should be allowed to smooth asset and liability values.

Precedents set by other European countries and the US...

The UK would be following a number of other countries in taking steps to reduce the burden of pension funding, as we discussed in the Q2 [Pension Perspectives](#). The US and Sweden introduced temporary floors on regulatory discount rates, while Denmark and the Netherlands increased the rates applied to long dated liabilities.

... but UK regulator previously dismissed calls to soften UK rules

The UK Pension Regulator has previously dismissed calls to soften UK funding rules in response to falling gilt yields. Its current statutory objectives are to protect pensioners and reduce the risk of compensation payments by the Pension Protection Fund. It is therefore not clear how an explicit objective to consider sponsor affordability would fit with these, whilst it could be argued that the regulator already implicitly considers sponsor affordability when determining the sustainability of deficit recovery plans. The Pension Regulator acknowledged the government’s intended consultations, but noted that its approach will not change until it is clear that the legislative framework is to be amended.

The consultations are to be undertaken by the Department of Work and Pensions, but consultation papers have not yet been issued. Any changes to UK pension regulation could reduce the minimum funding requirements for UK companies. However, IFRS rules are unaffected, so reported deficits would not be affected by any change from the consultations.

¹ See www.hm-treasury.gov.uk, 5 December 2012.

Invensys to use division disposal proceeds to fund UK deficit

Invensys to use part of Rail division sale proceeds to fund pension deficit

In November Invensys announced it had agreed to sell its Rail division to Siemens for £1.7bn, proposing that £400m be contributed to the UK pension scheme, with a further £225m locked in trust as a contingent scheme asset². The deal is expected to complete in Q2 2013 (subject to all relevant approvals).

Removing annual deficit repair obligations up to 2018 at least

The proposed actions, which have been approved by the UK Pensions Regulator, would mean that Invensys is unlikely to be required to make deficit repair payments until 2018 at the earliest, removing the obligation of scheduled payments of £40-47m p.a. over this period.

Invensys has previously been open about its objectives for mitigating UK pension risk, with the ultimate goal of achieving a pension buy-out. We featured Invensys as a case study in our review of pension risk management tools in last quarter's [Pension Perspectives](#), noting that while Invensys' UK pension scheme is large (gross liabilities of £4.5bn at 30 September 2012), it is also mature (1% active members, 63% pensioners) with a relatively low risk asset allocation.

Transaction crystallises conservative buy-out valuation of Rail division's pension liabilities

While the announced disposal and associated pension funding clearly improves the UK pension funding position and reduces the burden of pensions on operating cash flows, the transaction does not represent a significant reduction in pension risk, in our view. The disposal of a part of the business without also transferring any significant pension liabilities (Siemens are assuming only c.2.5% of total pension liabilities) in effect crystallises a conservative buy-out (section 75) valuation of the liabilities, with the amount contributed representing the amount needed to fund the relevant schemes on a full buy-out basis. Invensys will still be sponsor to c. £6bn of UK pension liabilities, and therefore remains exposed to the risks associated with these (as well as investment risk on the plan assets).

Our analyst's view is that the deal is positive given the valuation attributed to the Rail business, and a better funded pension scheme makes it easier for prospective acquirers to gain shareholder support. In his view, it is in any case arguable that the pension scheme is a major barrier for larger players (such as Emerson) which have shown interest in acquiring Invensys.

Deutsche Post issues debt to fund pension scheme

€2bn debt issuance to be used to improve German schemes' funding

Deutsche Post recently announced the issuance of €2bn of debt, which the company intends to use to obtain long-term funding for some of its pension obligations³. The company issued a €1bn 7-year convertible and two other bonds, a €300m 8-year and a €700m 12-year. The company noted that its intention was to take advantage of favourable capital market conditions currently available to companies with strong credit quality, and noted that the move would have a small positive effect on the financial result and net income (as the discount rate used to accrue interest on the pension deficit is greater than the cost of the debt instruments). Overall it appears the impact on EPS will be at least neutral.

Average total cash cost of defined benefit pensions €610m over 2006-2011

Deutsche Post intends to use the cash raised to "almost double" the plan assets available to pay pensions to Germany employees. The move will improve operating cash flows; Deutsche Post has contributed an average of €194m into German plan

² See www.invensys.com, 28 November 2012.

³ See www.dp-dhl.com, 4 December 2012.

assets over 2006-2011, and has paid an average of €287m p.a. in German scheme benefits from operating cash flows over 2006-2011.

As shown in Figure 6, Deutsche Post reported €2.1bn of German plan assets in 2011, and a deficit of €1.9bn on its German funded schemes. The company also has unfunded pension liabilities of €3.4bn in Germany, and an additional deficit on overseas schemes of €0.5bn (with average cash contributions of €130m over 2006-2011).

Figure 6. Deutsche Post pension exposure analysis, 2006-2011 (€m)

	2006	2007	2008	2009	2010	2011
Wholly/partly funded pension liabilities - Germany	4,150	3,686	3,558	3,879	4,003	4,097
Pension assets - Germany	1,852	1,914	1,992	2,073	2,122	2,106
Wholly/partly funded pension deficit - Germany	2,298	1,772	1,566	1,806	1,881	1,991
Unfunded pension liabilities - Germany	3,749	3,237	3,123	3,251	3,272	3,377
Total pension deficit - Germany	6,047	5,009	4,689	5,057	5,153	5,368
Other pension liabilities	5,709	5,179	4,172	4,534	5,074	5,783
Other pension assets	5,551	5,466	3,851	4,399	4,897	5,263
Other pension deficit	158	-287	321	135	177	520
Total pension liabilities	13,608	12,102	10,853	11,664	12,349	13,257
Total pension assets	7,403	7,380	5,843	6,472	7,019	7,369
Total pension deficit	6,205	4,722	5,010	5,192	5,330	5,888
Cash contributions						
Employer contributions - Germany	217	200	215	203	169	160
Benefits paid from corporate cash - Germany	291	291	301	280	278	279
Total employer contributions - Other	116	129	113	134	151	134
Total employer contributions	624	620	629	617	598	573

Source: Company reports, Citi Research. Deutsche Postbank figures excluded for 2006-2008. Other pension liabilities include unfunded liabilities. Other employer contributions include benefits paid out of corporate cash.

Practice of issuing debt to fund pensions more common in US to date

We are not aware of other major European companies having issued debt with the specific purpose of funding pension schemes. However, there have been examples of similar debt issues (but not convertibles) in the US in the past few years, including CSX Corp, Kroger, NiSource, and Raytheon. From a practical perspective we understand the appeal of this transaction, as it enables Deutsche Post to secure funding in favourable conditions, and reduces the strain of pensions on operating cash flows. However, on the basis that pensions are in effect an alternative form of debt, the company is simply replacing pension debt with financial debt, and therefore replacing future operating cash flows (ie pension contributions) with financing cash flows.

It is notable that the transactions have taken place ahead of changes to IAS 19, which took effect from 1 January 2013, as the €2bn of additional pension funding is likely to offset the additional c. €1.9bn of pension deficit (based on the end 2011 position) required to be recognised on balance sheet, as the corridor rule has been abolished. For more details on the changes to IAS 19, refer to [The Standards: New Pension Rules](#).

UK government opt against changing RPI calculation

In the Q3 [Pension Perspectives](#) we highlighted that the UK Office of National Statistics (ONS) was consulting on potential changes to the calculation of the Retail Price Index (RPI), one of the key measures of inflation and the basis of minimum pension indexation for many schemes (despite the statutory move to CPI in 2010). The key aspect of the consultation was changes to the RPI calculation, as the

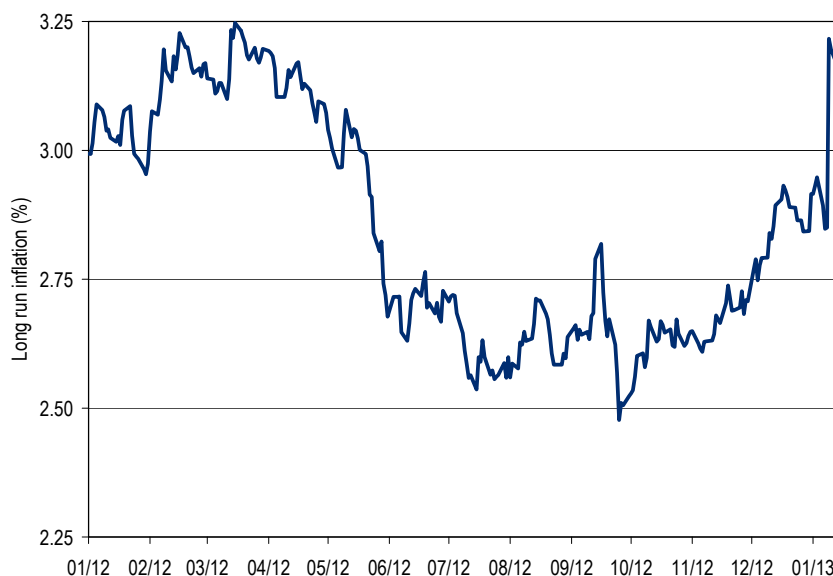
ONS retains current RPI methodology, which overstates inflation due to 'formula effect'

current RPI calculation overstates inflation due to use of arithmetic rather than geometric means (known as the 'formula effect').

The ONS has subsequently decided to maintain the status quo for calculating RPI (as discussed by Citi Economists: [UK - ONS Decide on Option 1](#), 10 January), although it will introduce an alternative measure known as 'RPIJ' which will calculate retail price inflation excluding the formula effect. This decision could be a significant negative factor for pension schemes which apply RPI indexation. Companies are required to base long-run inflation estimates on market expectations, and so the spike in long run implied RPI inflation on the 10 January (as shown in Figure 7) is likely to result in higher inflation estimates for companies reporting after this date. IAS 19 requires the use of market inputs at the balance sheet date, and therefore (based on discussions with Big 4 auditors) we do not expect companies to specifically incorporate the impact of the ONS decision on 31 December 2012 inflation estimates. However, the ONS announcement is likely to be considered a non-adjusting post balance sheet event under IFRS rules, and some companies may therefore comment on the impact of the ONS decision on future liability valuations if the impact is material.

Long-run RPI spike may lead to higher pension liability valuations for some companies in 2013

Figure 7. Long run implied RPI inflation spiked on the ONS announcement on 10 January



Source: Bank of England

Corporate pension exposure screens

For screens including all index constituents email neil.dawson@citi.com

We include three screens to assess a company's exposure to pension risk. This quarter we include pension screens for the US and Japan, as well as the UK and Europe. We use the most recent annual report for pension data and current prices for market caps. Differing company year-ends reduce the comparability of the data. The three screens are:

- **Pension liabilities compared to market cap** – This is our primary screen. Companies with the largest pension liabilities are generally most at risk of large changes in pension deficits due to changes in discount rate, inflation, mortality

assumptions and asset returns⁴. This screen captures companies which may have small pension deficits or surpluses but are exposed to significant pension risk due to the scheme size.

- **Pension deficits compared to market cap** – This screen indicates which companies have the largest net liability relating to pensions and therefore largest potential cash outflows in forthcoming years. Pension deficits can be volatile from quarter to quarter so may have changed significantly since the last annual report. Note that the pension deficits shown below are gross of any associated tax asset. For valuation purposes (e.g. in Enterprise Value or DCF calculations) we prefer to take the net-of-tax pension deficit, but these figures are not disclosed consistently by all companies.
- **Pension fund equity exposure compared to market cap** – We compare the value of equities held in the pension fund to the market cap of the company. This indicates which companies might be most exposed via the pension fund to a decline in equities, and indicates riskier asset allocation. A large equity holding relative to the company's market cap should (theoretically) increase the beta of the company's share price.

This screening is a crude tool for identifying pension risk. It does not identify the extent to which pension risks have been mitigated, e.g. through asset-liability matching techniques. Further, companies may have special circumstances that affect the nature and risks of the pension liabilities, such as specific regulatory treatment of pensions or employee risk-sharing arrangements. Nevertheless, companies appearing on these screens have potential material exposure to pension risk that we believe warrants further investigation.

UK – FTSE 350

FTSE 350 companies most exposed to pension risk: IAG, FirstGroup, Go-Ahead Group, BT Group, and Invensys

Figure 8. FTSE 350 pension liabilities as a percentage of market cap (m)

Company	RIC	Curr	Year End	Price (local)	Mkt cap	Liabilities	Liabilities as % Mkt Cap
IAG	ICAG.MC	EUR	12/11	2.55	4,726	19,947	422%
FirstGroup ¹	FGP.L	GBP	03/12	1.94	933	3,910	419%
Go-Ahead Group ¹	GOG.L	GBP	06/12	12.79	550	1,843	335%
BT Group	BT.L	GBP	03/12	2.45	19,273	40,989	213%
Invensys	ISYS.L	GBP	03/12	3.39	2,762	5,801	210%
BAE Systems	BAES.L	GBP	12/11	3.45	11,202	23,146	207%
Phoenix Group	PHNX.L	GBP	12/11	5.69	1,677	3,043	181%
Kier Group	KIE.L	GBP	06/12	13.72	546	941	172%
WS Atkins	ATKW.L	GBP	03/12	7.71	772	1,330	172%
Carillion	CLLN.L	GBP	12/11	3.21	1,382	2,204	159%
Dairy Crest Group	DCG.L	GBP	03/12	3.99	544	846	155%
Balfour Beatty	BALF.L	GBP	12/11	2.90	1,994	2,915	146%
RSA Insurance Group	RSAL.L	GBP	12/11	1.26	4,542	6,002	132%
Mitchells & Butlers	MAB.L	GBP	09/12	3.16	1,296	1,698	131%
Stagecoach Group ¹	SGC.L	GBP	04/12	3.04	1,751	2,265	129%
Interserve	IRV.L	GBP	12/11	4.35	551	695	126%
Marks and Spencer	MKS.L	GBP	03/12	3.63	5,835	6,096	104%
Dixons Retail	DXNS.L	GBP	04/12	0.27	987	992	101%
WH Smith	SMWH.L	GBP	08/12	6.15	786	776	99%
QinetiQ	QQ.L	GBP	03/12	1.79	1,162	1,139	98%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. ¹Companies participate in Railways Pension Scheme where liability is limited by duration of franchise agreements, but we have included 100% of reported liabilities.

⁴ Assuming the pension liabilities are backed by assets.

Largest deficits: BAE Systems, WS Atkins, FirstGroup, Dixons, and Carillion

Figure 9. FTSE 350 pension deficits as a percentage of market cap (m)

Company	RIC	Curr	Year End	Price (local)	Mkt cap	Liabilities	Assets	Deficits	Deficits as % Mkt Cap
BAE Systems ¹	BAES.L	GBP	12/11	3.45	11,202	23,146	17,577	4,604	41%
WS Atkins	ATKW.L	GBP	03/12	7.71	772	1,330	1,079	251	33%
FirstGroup ²	FGP.L	GBP	03/12	1.94	933	3,910	3,397	268	29%
Dixons Retail	DXNS.L	GBP	04/12	0.27	987	992	730	262	27%
Carillion	CLLN.L	GBP	12/11	3.21	1,382	2,204	1,898	306	22%
GKN Plc	GKN.L	GBP	12/11	2.42	3,947	3,561	2,693	868	22%
TUI Travel Plc	TT.L	GBP	09/12	2.92	3,261	1,991	1,343	648	20%
Morgan Crucible	MGCR.L	GBP	01/12	2.73	767	567	432	135	18%
Synthomer PLC	SYNTS.L	GBP	12/11	1.99	675	322	204	118	17%
John Menzies	MNZS.L	GBP	12/11	6.54	394	306	242	64	16%
De La Rue	DLAR.L	GBP	03/12	9.38	934	843	698	146	16%
Invensys	ISYS.L	GBP	03/12	3.39	2,762	5,801	5,409	426	15%
Dairy Crest Group	DCG.L	GBP	03/12	3.99	544	846	766	80	15%
Balfour Beatty	BALF.L	GBP	12/11	2.90	1,994	2,915	2,640	275	14%
Whitbread	WTB.L	GBP	03/12	24.67	4,419	1,940	1,341	599	14%
BT Group	BT.L	GBP	03/12	2.45	19,273	40,989	38,541	2,448	13%
Smiths Group	SMIN.L	GBP	07/12	12.18	4,788	3,945	3,348	597	12%
Howdens	HWDN.L	GBP	12/11	1.81	1,162	778	641	137	12%
Kier Group	KIE.L	GBP	06/12	13.72	546	941	883	58	11%
Home Retail Group	HOME.L	GBP	03/12	1.37	1,111	880	764	115	10%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. Deficits reflect unrecognised surplus due to application of asset ceiling. ¹BAE Systems attributes portion of deficit to other companies; we include 100% of assets and liabilities but include the adjusted deficit as reported. ²Company participates in Railways Pension Scheme where liability is limited by duration of franchise agreements. We have included 100% of assets and liabilities but include adjusted deficit as reported.

Most exposed to equities in pension fund: Go-Ahead Group, IAG, Kier Group, FirstGroup, and Stagecoach Group

Figure 10. FTSE 350 equity exposure from pension funds (m)

Company	RIC	Curr	Year End	Price (local)	Mkt cap	Assets	Equities %	Bonds %	Other %	Exposure*
Go-Ahead Group ¹	GOG.L	GBP	06/12	12.79	550	1,576	70%	5%	24%	202%
IAG	ICAG.MC	EUR	12/11	2.55	4,726	19,515	33%	47%	20%	137%
Kier Group	KIE.L	GBP	06/12	13.72	546	883	72%	26%	2%	116%
FirstGroup ¹	FGP.L	GBP	03/12	1.94	933	3,397	27%	26%	47%	99%
Stagecoach Group ¹	SGC.L	GBP	04/12	3.04	1,751	1,974	73%	13%	14%	83%
BAE Systems	BAES.L	GBP	12/11	3.45	11,202	17,577	51%	40%	9%	80%
WS Atkins	ATKW.L	GBP	03/12	7.71	772	1,079	51%	44%	6%	71%
Carillion	CLLN.L	GBP	12/11	3.21	1,382	1,898	48%	50%	1%	66%
Interserve	IRV.L	GBP	12/11	4.35	551	639	44%	47%	9%	51%
QinetiQ	QQ.L	GBP	03/12	1.79	1,162	1,108	53%	34%	13%	50%
Balfour Beatty	BALF.L	GBP	12/11	2.90	1,994	2,640	38%	52%	11%	50%
Dixons Retail	DXNS.L	GBP	04/12	0.27	987	730	66%	28%	6%	49%
National Express Group	NEX.L	GBP	12/11	2.14	1,091	821	60%	38%	2%	45%
BT Group	BT.L	GBP	03/12	2.45	19,273	38,541	21%	38%	41%	42%
De La Rue	DLAR.L	GBP	03/12	9.38	934	698	51%	41%	8%	38%
Mitchells & Butlers	MAB.L	GBP	09/12	3.16	1,296	1,610	30%	66%	4%	38%
John Menzies	MNZS.L	GBP	12/11	6.54	394	242	61%	27%	12%	37%
RSA Insurance Group	RSA.L	GBP	12/11	1.26	4,542	5,813	26%	79%	-5%	33%
Smiths Group	SMIN.L	GBP	07/12	12.18	4,788	3,348	46%	14%	40%	32%
National Grid	NG.L	GBP	03/12	6.83	25,011	19,957	41%	50%	10%	32%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. *Value of equity assets in pension fund as percentage of market cap. ¹Companies participate in Railways Pension Scheme where liability is limited by duration of franchise agreements, but we have included 100% of reported assets.

Europe – MSCI Europe ex UK

MSCI Europe ex UK companies most exposed to pension risk: Fiat, Lufthansa, Peugeot, KPN, and Akzo Nobel

Figure 11. MSCI Europe ex UK pension liabilities as a percentage of market cap (m)

Company	RIC	Curr	Year End	Price (local)	Mkt cap	Liabilities	Liabilities as % Mkt Cap
Fiat SpA	FIA.MI	EUR	12/11	4.50	5,627	25,964	461%
Lufthansa	LHAG.DE	EUR	12/11	15	6,757	12,941	192%
Peugeot SA	PEUP.PA	EUR	12/11	6.44	2,284	3,787	166%
KPN NV	KPN.AS	EUR	12/11	4.44	6,360	8,299	130%
Akzo Nobel	AKZO.AS	EUR	12/11	52.28	12,455	15,110	121%
Philips	PHG.AS	EUR	12/11	21.50	20,578	22,413	109%
EDF	EDF.PA	EUR	12/11	14.71	27,188	28,267	104%
RWE AG	RWEG.DE	EUR	12/11	29.33	17,961	18,141	101%
Thales	TCFP.PA	EUR	12/11	26.40	5,340	4,787	90%
Salzgitter AG	SZGG.DE	EUR	12/11	36.74	2,208	1,901	86%
Delta Lloyd	DLL.AS	EUR	12/11	14.50	2,563	2,080	81%
Lonza Group AG	LONN.VX	CHF	12/11	56.65	2,998	2,394	80%
ATOS	ATOS.PA	EUR	12/11	54.86	4,672	3,285	70%
Commerzbank	CBKG.DE	EUR	12/11	1.66	9,677	6,242	65%
Deutsche Post	DPWGn.DE	EUR	12/11	17.38	21,013	13,257	63%
Baloise Holding AG	BALN.VX	CHF	12/11	83.95	4,198	2,648	63%
Finmeccanica	SIFI.MI	EUR	12/11	4.97	2,871	1,798	63%
Swiss Life Holding	SLHN.VX	CHF	12/11	135.90	4,360	2,646	61%
TDC	TDC.CO	DKK	12/11	41.65	34,361	20,340	59%
Aegon	AEGN.AS	EUR	12/11	4.97	9,793	5,581	57%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. IAG excluded from MSCI Europe ex UK as included in FTSE 350.

Largest deficits: Fiat, Salzgitter, Delta Lloyd, Lufthansa, and EDF

Figure 12. MSCI Europe ex UK pension deficits as a percentage of market cap (m)

Company	RIC	Curr	Year End	Price (local)	Mkt cap	Liabilities	Assets	Deficits	Deficits as % Mkt Cap
Fiat SpA	FIA.MI	EUR	12/11	4.50	5,627	25,964	20,004	5,960	106%
Salzgitter AG	SZGG.DE	EUR	12/11	36.74	2,208	1,901	8	1,893	86%
Delta Lloyd	DLL.AS	EUR	12/11	14.50	2,563	2,080	65	2,023	79%
Lufthansa	LHAG.DE	EUR	12/11	14.69	6,757	12,941	8,186	4,755	70%
EDF	EDF.PA	EUR	12/11	14.71	27,188	28,267	12,594	15,673	58%
Swiss Life Holding	SLHN.VX	CHF	12/11	135.90	4,360	2,646	1,059	1,587	36%
Aegon	AEGN.AS	EUR	12/11	4.97	9,793	5,581	2,543	3,038	31%
Thales	TCFP.PA	EUR	12/11	26.40	5,340	4,787	3,227	1,560	29%
Peugeot SA	PEUP.PA	EUR	12/11	6.44	2,284	3,787	3,137	650	28%
Deutsche Post	DPWGn.DE	EUR	12/11	17.38	21,013	13,257	7,369	5,890	28%
Solvay SA	SOLB.BR	EUR	12/11	114.10	9,664	4,233	1,818	2,426	25%
AXA SA	AXAF.PA	EUR	12/11	13.71	32,736	16,353	8,311	8,049	25%
UniCredit Group	CRDI.MI	EUR	12/11	4.34	25,138	8,700	3,292	5,499	22%
RWE AG	RWEG.DE	EUR	12/11	29.33	17,961	18,141	14,355	3,846	21%
Baloise Holding	BALN.VX	CHF	12/11	83.95	4,198	2,648	1,947	890	21%
Volkswagen AG	VOWG.DE	EUR	12/11	165.25	79,117	23,251	6,559	16,739	21%
Capgemini SA	CAPP.PA	EUR	12/11	34.56	5,590	3,027	1,898	1,129	20%
EADS	EAD.PA	EUR	12/11	33.70	27,882	10,639	5,135	5,504	20%
KPN NV	KPN.AS	EUR	12/11	4.44	6,360	8,299	7,224	1,075	17%
Deutsche Telekom	DTEGn.DE	EUR	12/11	9.02	38,970	6,969	860	6,112	16%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. Deficits reflect unrecognised surplus due to application of asset ceiling.

Most exposed to equities in pension fund: Fiat, Peugeot, KPN, Lufthansa, and Lonza

Figure 13. MSCI Europe ex UK equity exposure from pension funds (m)

Company	RIC	Curr	Year End	Price (local)	Mkt cap	Assets	Equities %	Bonds %	Other %	Exposure*
Fiat SpA	FIA.MI	EUR	12/11	4.50	5,627	20,004	25%	43%	32%	89%
Peugeot SA	PEUP.PA	EUR	12/11	6.44	2,284	3,137	35%	65%	0%	48%
KPN NV	KPN.AS	EUR	12/11	4.44	6,360	7,224	37%	41%	23%	41%
Lufthansa	LHAG.DE	EUR	12/11	15	6,757	8,186	31%	46%	23%	37%
Lonza Group AG	LONN.VX	CHF	12/11	56.65	2,998	2,001	42%	13%	45%	28%
Baloise Holding	BALN.VX	CHF	12/11	83.95	4,198	1,947	50%	21%	29%	23%
Thales	TCFP.PA	EUR	12/11	26.40	5,340	3,227	32%	55%	13%	20%
Capgemini SA	CAPP.PA	EUR	12/11	34.56	5,590	1,898	56%	40%	4%	19%
ING Groep NV	ING.AS	EUR	12/11	7.60	29,110	20,077	27%	60%	13%	19%
Akzo Nobel	AKZO.AS	EUR	12/11	52.28	12,455	14,605	15%	73%	12%	18%
Philips	PHG.AS	EUR	12/11	21.50	20,578	21,249	16%	73%	11%	17%
RWE AG	RWEG.DE	EUR	12/11	29.33	17,961	14,355	20%	54%	25%	16%
Lafarge SA	LAFP.PA	EUR	12/11	47.98	13,781	3,855	53%	43%	5%	15%
Alstom	ALSO.PA	EUR	03/12	32.25	9,933	4,097	35%	53%	12%	14%
EDf	EDF.PA	EUR	12/11	14.71	27,188	12,594	30%	64%	6%	14%
Michelin	MICP.PA	EUR	12/11	71.28	12,973	4,810	37%	47%	16%	14%
Aegon	AEGN.AS	EUR	12/11	4.97	9,793	2,543	52%	39%	8%	14%
Veolia	VIE.PA	EUR	12/11	8.88	4,637	1,282	47%	43%	10%	13%
Electrolux	ELUXb.ST	SEK	12/11	166.60	51,494	18,468	35%	47%	18%	13%
ATOS	ATOS.PA	EUR	12/11	54.86	4,672	3,082	19%	63%	18%	13%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. *Value of equity assets in pension fund as percentage of market cap. IAG excluded from MSCI Europe ex UK as included in FTSE 350.

USA – S&P 500

S&P 500 companies most exposed to pension risk: US Steel, Goodyear, Northrop, ALCOA, and Ford

Figure 14. S&P 500 pension liabilities as a percentage of market cap (USD m)

Company	RIC	Year End	Price (local)	Mkt cap	Liabilities	Liabilities as % Mkt Cap
US Steel Corp	X.N	12/11	24.70	3,564	10,770	302%
Goodyear Tire	GT.O	12/11	13.88	3,400	8,711	256%
Northrop Corp	NOC.N	12/11	67.14	16,479	24,129	146%
ALCOA	AA.N	12/11	8.94	9,541	13,526	142%
Ford Motor	F.N	12/11	14.22	53,209	73,979	139%
JC Penney	JCP.N	01/12	18.14	3,977	5,297	133%
Lockheed Martin	LMT.N	12/11	94.75	30,660	40,616	132%
Boeing	BA.N	12/11	75.26	56,752	67,651	119%
Raytheon	RTN.N	12/11	58.25	19,215	21,613	112%
Owens Illinois	OI.N	12/11	22.69	3,733	4,100	110%
Xerox Corp	XR.N	12/11	7.58	9,646	10,505	109%
Pitney Bowes	PBI.N	12/11	11.73	2,355	2,289	97%
Hewlett-Packard	HPQ.N	10/12	17.11	33,333	32,334	97%
Computer Science	CSC.N	03/12	41.76	6,488	6,016	93%
Allegheny Tech	ATI.N	12/11	30.07	3,227	2,750	85%
The AES Corp	AES.N	12/11	11.07	8,236	6,833	83%
Textron Inc	TXT.N	12/11	27.09	7,635	6,325	83%
PG&E	PCG.N	12/11	40.82	17,552	14,000	80%
Gannett	GCI.N	12/11	19.68	4,522	3,351	74%
Consol Edison	ED.N	12/11	55.28	16,190	11,825	73%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013.

Largest deficits: Goodyear, US Steel, Lockheed Martin, ALCOA, and Raytheon

Figure 15. S&P 500 pension deficits as a percentage of market cap (USD m)

Company	RIC	Year End	Price (local)	Mkt cap	Liabilities	Assets	Deficits	Deficits as % Mkt Cap
Goodyear Tire	GT.N	12/11	13.88	3,400	8,711	5,614	3,097	91%
US Steel Corp	X.N	12/11	24.70	3,564	10,770	8,353	2,417	68%
Lockheed Martin	LMT.N	12/11	94.75	30,660	40,616	27,292	13,324	43%
ALCOA	AA.N	12/11	8.94	9,541	13,526	10,311	3,181	33%
Raytheon	RTN.N	12/11	58.25	19,215	21,613	15,552	6,061	32%
Boeing	BA.N	12/11	75.26	56,752	67,651	51,051	16,600	29%
Ford Motor	F.N	12/11	14.22	53,209	73,979	58,612	15,367	29%
Consol Edison	ED.N	12/11	55.28	16,190	11,825	7,800	4,025	25%
Xerox Corp	XR.N	12/11	7.58	9,646	10,505	8,277	2,228	23%
DuPont	DD.N	12/11	46.36	43,229	27,083	17,794	9,289	21%
Gannett	GCI.N	12/11	19.68	4,522	3,351	2,409	943	21%
Owens Illinois	OI.N	12/11	22.69	3,733	4,100	3,336	764	20%
Hewlett-Packard	HPQ.N	10/12	17.11	33,333	32,334	25,557	6,777	20%
The AES Corp	AES.N	12/11	11.07	8,236	6,833	5,162	1,671	20%
Computer Science	CSC.N	03/12	41.76	6,488	6,016	4,714	1,302	20%
Ryder System	R.N	12/11	54.80	2,801	1,968	1,418	550	20%
Safeway	SWY.N	12/11	18.06	4,327	2,425	1,641	783	18%
Pitney Bowes	PBI.N	12/11	11.73	2,355	2,289	1,865	424	18%
Whirlpool Corp	WHR.N	12/11	107.40	8,361	4,245	2,743	1,502	18%
Rockwell Collins	COL.N	09/12	60.15	8,312	3,967	2,501	1,466	18%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013.

Most exposed to equities in pension fund: US Steel, Goodyear, JC Penney, Washington Post, and Owens Illinois

Figure 16. S&P 500 equity exposure from pension funds (USD m)

Company	RIC	Year End	Price (local)	Market Cap	Pension Assets	Equities %	Bonds %	Other %	Exposure *
US Steel Corp	X.N	12/11	24.70	3,564	8,353	54%	27%	19%	127%
Goodyear Tire	GT.N	12/11	13.88	3,400	5,614	49%	44%	7%	81%
JC Penney	JCP.N	01/12	18.14	3,977	5,176	53%	38%	9%	69%
Washington Post	WPO.N	12/11	381.21	2,813	1,817	90%	10%	0%	58%
Owens Illinois	OI.N	12/11	22.69	3,733	3,336	57%	41%	3%	51%
Northrop Corp	NOC.N	12/11	67.14	16,479	21,340	31%	46%	24%	40%
Raytheon	RTN.N	12/11	58.25	19,215	15,552	46%	32%	22%	38%
ALCOA	AA.N	12/11	8.94	9,541	10,311	34%	50%	16%	37%
Ford Motor	F.N	12/11	14.22	53,209	58,612	33%	51%	17%	36%
Computer Science	CSC.N	03/12	41.76	6,488	4,714	49%	46%	5%	36%
Textron Inc	TXT.N	12/11	27.09	7,635	5,013	50%	30%	20%	33%
Pitney Bowes	PBI.N	12/11	11.73	2,355	1,865	41%	50%	9%	32%
Ryder System	R.N	12/11	54.80	2,801	1,418	64%	32%	4%	32%
Xerox Corp	XR.N	12/11	7.58	9,646	8,277	36%	43%	21%	31%
Lockheed Martin	LMT.N	12/11	94.75	30,660	27,292	34%	40%	26%	30%
Consol Edison	ED.N	12/11	55.28	16,190	7,800	61%	32%	7%	29%
PG&E	PCG.N	12/11	40.82	17,552	10,993	45%	50%	5%	28%
Allegheny Tech	ATI.N	12/11	30.07	3,227	2,233	39%	47%	14%	27%
Safeway	SWY.N	12/11	18.06	4,327	1,641	66%	33%	1%	25%
Gannett	GCI.N	12/11	19.68	4,522	2,409	46%	39%	15%	25%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. *Value of equity assets in pension fund as percentage of market cap

Japan – Nikkei 225

Nikkei 225 companies most exposed to pension risk: TEPCO, Fujitsu, Panasonic, NEC, and Oki Electric Industry

Figure 17. Nikkei 225 pension liabilities as percentage of market cap (JPY bn)

Company	RIC	Year End	Price (local)	Mkt cap	Liabilities	Liabilities as % Mkt Cap
TEPCO	9501.T	03/12	210	337	1,004	298%
Fujitsu	6702.T	03/12	338	699	1,871	268%
Panasonic	6752.T	03/12	564	1,304	2,294	176%
NEC	6701.T	03/12	210	546	930	170%
Oki Electric Industry Co Ltd	6703.T	03/12	100	73	107	147%
Fuji Electric Co Ltd	6504.T	03/12	208	149	203	137%
Nippon Paper Group Inc	3893.T	03/12	1,212	140	180	128%
Toshiba	6502.T	03/12	347	1,470	1,607	109%
Meidensha Corp	6508.T	03/12	285	65	64	98%
Sony	6758.T	03/12	1,024	1,035	1,011	98%
Mitsui Chemicals	4183.T	03/12	204	204	194	95%
Pioneer	6773.T	03/12	213	68	64	93%
Sharp	6753.T	03/12	338	382	349	91%
Mitsubishi Chemical Holdings	4188.T	03/12	422	622	561	90%
Nippon Suisan Kaisha Ltd*	1332.T	03/12	183	51	45	90%
Hitachi	6501.T	03/12	528	2,486	2,210	89%
Furukawa Electric Co Ltd	5801.T	03/12	182	129	114	89%
NTN Corp	6472.T	03/12	229	122	97	80%
Nisshinbo Holdings	3105.T	03/12	709	124	98	79%
NTT	9432.T	03/12	3,775	4,519	3,505	78%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. *English annual report disclosures unavailable, data not checked.

Largest deficits: TEPCO, Fujitsu, Meidensha, Furukawa Electric, and NEC

Figure 18. Nikkei 225 pension deficits as percentage of market cap (JPY bn)

Company	RIC	Year End	Price (local)	Mkt cap	Liabilities	Assets	Deficits	Deficits as % Mkt Cap
TEPCO	9501.T	03/12	210	337	1,004	583	421	125%
Fujitsu	6702.T	03/12	338	699	1,871	1,352	519	74%
Meidensha Corp	6508.T	03/12	285	65	64	18	46	71%
Furukawa Electric Co Ltd	5801.T	03/12	182	129	114	43	71	55%
NEC	6701.T	03/12	210	546	930	628	302	55%
Toshiba	6502.T	03/12	347	1,470	1,607	829	778	53%
West Japan Railway*	9021.T	03/12	3,515	681	345	7	338	50%
Nippon Paper Group Inc	3893.T	03/12	1,212	140	180	111	69	49%
Showa Shell Sekiyu	5002.T	12/11	487	183	105	17	88	48%
Unitika Ltd*	3103.T	03/12	50	29	14	1	13	46%
Maruha Nichiro Holdings Inc*	1334.T	03/12	158	78	53	18	35	45%
Panasonic	6752.T	03/12	564	1,304	2,294	1,721	572	44%
Nippon Suisan Kaisha Ltd*	1332.T	03/12	183	51	45	23	22	44%
Kansai Electric Power	9503.T	03/12	891	796	350	3	347	44%
IHI Corp	7013.T	03/12	237	347	146	0	146	42%
Pioneer	6773.T	03/12	213	68	64	37	27	39%
Oki Electric Industry Co Ltd	6703.T	03/12	100	73	107	79	28	39%
Nisshinbo Holdings	3105.T	03/12	709	124	98	52	47	38%
NTN Corp	6472.T	03/12	229	122	97	52	45	37%
Hitachi	6501.T	03/12	528	2,486	2,210	1,297	913	37%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. *English annual report disclosures unavailable, data not checked.

Asset allocation disclosures not required under Japan GAAP; therefore relatively little data available

Figure 19. Nikkei 225 equity exposure from pension funds (JPY bn)*

Company	RIC	Year End	Price (local)	Mkt cap	Pension Assets	Equities %	Bonds %	Other %	Exposure ¹
Panasonic	6752.T	03/12	564	1,304	1,721	36%	41%	23%	48%
Toshiba	6502.T	03/12	347	1,470	829	42%	33%	25%	24%
Sony	6758.T	03/12	1,024	1,035	707	28%	51%	21%	19%
Fujifilm Holdings	4901.T	03/12	1,782	858	571	27%	35%	38%	18%
Mitsubishi Electric	6503.T	03/12	747	1,604	683	41%	40%	19%	17%
Hitachi	6501.T	03/12	528	2,486	1,297	30%	45%	25%	16%
NTT	9432.T	03/12	3,775	4,519	1,970	30%	58%	12%	13%
Ricoh	7752.T	03/12	999	724	304	27%	49%	24%	11%
TDK	6762.T	03/12	3,240	408	135	31%	31%	38%	10%

Source: dataCentral, DataStream, Company annual reports. Market data as of 18 January 2013. *Asset allocation disclosures are not required under Japanese GAAP so limited data is available. We have included companies where data is available and equity exposure is at least 10% of market cap. ¹Value of equity assets in pension fund as percentage of market cap.

Appendix A-1

Analyst Certification

The research analyst(s) primarily responsible for the preparation and content of this research report are named in bold text in the author block at the front of the product except for those sections where an analyst's name appears in bold alongside content which is attributable to that analyst. Each of these analyst(s) certify, with respect to the section(s) of the report for which they are responsible, that the views expressed therein accurately reflect their personal views about each issuer and security referenced and were prepared in an independent manner, including with respect to Citigroup Global Markets Inc and its affiliates. No part of the research analyst's compensation was, is, or will be, directly or indirectly, related to the specific recommendation(s) or view(s) expressed by that research analyst in this report.

IMPORTANT DISCLOSURES

Analysts' compensation is determined based upon activities and services intended to benefit the investor clients of Citigroup Global Markets Inc. and its affiliates ("the Firm"). Like all Firm employees, analysts receive compensation that is impacted by overall firm profitability which includes investment banking revenues.

For important disclosures (including copies of historical disclosures) regarding the companies that are the subject of this Citi Research product ("the Product"), please contact Citi Research, 388 Greenwich Street, 28th Floor, New York, NY, 10013, Attention: Legal/Compliance [E6WYB6412478]. In addition, the same important disclosures, with the exception of the Valuation and Risk assessments and historical disclosures, are contained on the Firm's disclosure website at https://www.citivelocity.com/cvr/eppublic/citi_research_disclosures. Valuation and Risk assessments can be found in the text of the most recent research note/report regarding the subject company. Historical disclosures (for up to the past three years) will be provided upon request.

Citi Research Equity Ratings Distribution

Data current as of 31 Dec 2012

Citi Research Global Fundamental Coverage

% of companies in each rating category that are investment banking clients

12 Month Rating			Relative Rating		
Buy	Hold	Sell	Buy	Hold	Sell
49%	38%	12%	7%	86%	7%
53%	49%	45%	60%	49%	55%

Guide to Citi Research Fundamental Research Investment Ratings:

Citi Research stock recommendations include an investment rating and an optional risk rating to highlight high risk stocks.

Risk rating takes into account both price volatility and fundamental criteria. Stocks will either have no risk rating or a High risk rating assigned.

Investment Ratings: Citi Research investment ratings are Buy, Neutral and Sell. Our ratings are a function of analyst expectations of expected total return ("ETR") and risk. ETR is the sum of the forecast price appreciation (or depreciation) plus the dividend yield for a stock within the next 12 months. The Investment rating definitions are: Buy (1) ETR of 15% or more or 25% or more for High risk stocks; and Sell (3) for negative ETR. Any covered stock not assigned a Buy or a Sell is a Neutral (2). For stocks rated Neutral (2), if an analyst believes that there are insufficient valuation drivers and/or investment catalysts to derive a positive or negative investment view, they may elect with the approval of Citi Research management not to assign a target price and, thus, not derive an ETR. Analysts may place covered stocks "Under Review" in response to exceptional circumstances (e.g. lack of information critical to the analyst's thesis) affecting the company and / or trading in the company's securities (e.g. trading suspension). As soon as practically possible, the analyst will publish a note re-establishing a rating and investment thesis. To satisfy regulatory requirements, we correspond Under Review and Neutral to Hold in our ratings distribution table for our 12-month fundamental rating system. However, we reiterate that we do not consider Under Review to be a recommendation.

Relative three-month ratings: Citi Research may also assign a three-month relative call (or rating) to a stock to highlight expected out-performance (most preferred) or under-performance (least preferred) versus the geographic and industry sector over a 3 month period. The relative call may highlight a specific near-term catalyst or event impacting the company or the market that is anticipated to have a short-term price impact on the equity securities of the company. Absent any specific catalyst the analyst(s) will indicate the most and least preferred stocks in the universe of stocks under consideration, explaining the basis for this short-term view. This three-month view may be different from and does not affect a stock's fundamental equity rating, which reflects a longer-term total absolute return expectation. For purposes of NASD/NYSE ratings-distribution-disclosure rules, most preferred calls correspond to a buy recommendation and least preferred calls correspond to a sell recommendation. Any stock not assigned to a most preferred or least preferred call is considered non-relative-rated (NRR). For purposes of NASD/NYSE ratings-distribution-disclosure rules we correspond NRR to Hold in our ratings distribution table for our 3-month relative rating system. However, we reiterate that we do not consider NRR to be a recommendation.

Prior to October 8, 2011, the firm's stock recommendation system included a risk rating and an investment rating. **Risk ratings**, which took into account both price volatility and fundamental criteria, were: Low (L), Medium (M), High (H), and Speculative (S). **Investment Ratings** of Buy, Hold and Sell were a function of the Citi Research expectation of total return (forecast price appreciation and dividend yield within the next 12 months) and risk rating. Additionally, analysts could have placed covered stocks "Under Review" in response to exceptional circumstances (e.g. lack of information critical to the analyst's thesis) affecting the company and/or trading in the company's securities (e.g. trading suspension). Stocks placed "Under Review" were monitored daily by management and as practically possible, the analyst published a note re-establishing a rating and investment thesis. For securities in developed markets (US, UK, Europe, Japan, and Australia/New Zealand), investment ratings were: Buy (1) (expected total return of 10% or more for Low-Risk stocks, 15% or more for Medium-Risk stocks, 20% or more for High-Risk stocks, and 35% or more for Speculative stocks); Hold (2) (0%-10% for Low-Risk stocks, 0%-15% for Medium-Risk stocks, 0%-20% for High-Risk stocks, and 0%-35% for Speculative stocks); and Sell (3) (negative total return). For securities in emerging markets (Asia Pacific, Emerging Europe/Middle East/Africa, and Latin America), investment ratings were: Buy (1) (expected total return of 15% or more for Low-Risk stocks, 20% or more for Medium-Risk stocks, 30% or more for High-Risk stocks, and 40% or more for Speculative stocks); Hold (2) (5%-15% for Low-Risk stocks, 10%-20% for Medium-Risk stocks, 15%-30% for High-Risk stocks, and 20%-40% for Speculative stocks); and Sell (3) (5% or less for Low-Risk stocks, 10% or less for Medium-Risk stocks, 15% or less for High-Risk stocks, and 20% or less for Speculative stocks).

Investment ratings are determined by the ranges described above at the time of initiation of coverage, a change in investment and/or risk rating, or a change in target price (subject to limited management discretion). At other times, the expected total returns may fall outside of these ranges because of market price movements and/or other short-term volatility or trading patterns. Such interim deviations from specified ranges will be permitted but will become subject to

review by Research Management. Your decision to buy or sell a security should be based upon your personal investment objectives and should be made only after evaluating the stock's expected performance and risk.

NON-US RESEARCH ANALYST DISCLOSURES

Non-US research analysts who have prepared this report (i.e., all research analysts listed below other than those identified as employed by Citigroup Global Markets Inc.) are not registered/qualified as research analysts with FINRA. Such research analysts may not be associated persons of the member organization and therefore may not be subject to the NYSE Rule 472 and NASD Rule 2711 restrictions on communications with a subject company, public appearances and trading securities held by a research analyst account. The legal entities employing the authors of this report are listed below:

Citigroup Global Markets Ltd

Neil Dawson; Sarah Deans

OTHER DISCLOSURES

For securities recommended in the Product in which the Firm is not a market maker, the Firm is a liquidity provider in the issuers' financial instruments and may act as principal in connection with such transactions. The Firm is a regular issuer of traded financial instruments linked to securities that may have been recommended in the Product. The Firm regularly trades in the securities of the issuer(s) discussed in the Product. The Firm may engage in securities transactions in a manner inconsistent with the Product and, with respect to securities covered by the Product, will buy or sell from customers on a principal basis.

Securities recommended, offered, or sold by the Firm: (i) are not insured by the Federal Deposit Insurance Corporation; (ii) are not deposits or other obligations of any insured depository institution (including Citibank); and (iii) are subject to investment risks, including the possible loss of the principal amount invested. Although information has been obtained from and is based upon sources that the Firm believes to be reliable, we do not guarantee its accuracy and it may be incomplete and condensed. Note, however, that the Firm has taken all reasonable steps to determine the accuracy and completeness of the disclosures made in the Important Disclosures section of the Product. The Firm's research department has received assistance from the subject company(ies) referred to in this Product including, but not limited to, discussions with management of the subject company(ies). Firm policy prohibits research analysts from sending draft research to subject companies. However, it should be presumed that the author of the Product has had discussions with the subject company to ensure factual accuracy prior to publication. All opinions, projections and estimates constitute the judgment of the author as of the date of the Product and these, plus any other information contained in the Product, are subject to change without notice. Prices and availability of financial instruments also are subject to change without notice. Notwithstanding other departments within the Firm advising the companies discussed in this Product, information obtained in such role is not used in the preparation of the Product. Although Citi Research does not set a predetermined frequency for publication, if the Product is a fundamental research report, it is the intention of Citi Research to provide research coverage of the/those issuer(s) mentioned therein, including in response to news affecting this issuer, subject to applicable quiet periods and capacity constraints. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security. Any decision to purchase securities mentioned in the Product must take into account existing public information on such security or any registered prospectus.

Investing in non-U.S. securities, including ADRs, may entail certain risks. The securities of non-U.S. issuers may not be registered with, nor be subject to the reporting requirements of the U.S. Securities and Exchange Commission. There may be limited information available on foreign securities. Foreign companies are generally not subject to uniform audit and reporting standards, practices and requirements comparable to those in the U.S. Securities of some foreign companies may be less liquid and their prices more volatile than securities of comparable U.S. companies. In addition, exchange rate movements may have an adverse effect on the value of an investment in a foreign stock and its corresponding dividend payment for U.S. investors. Net dividends to ADR investors are estimated, using withholding tax rates conventions, deemed accurate, but investors are urged to consult their tax advisor for exact dividend computations. Investors who have received the Product from the Firm may be prohibited in certain states or other jurisdictions from purchasing securities mentioned in the Product from the Firm. Please ask your Financial Consultant for additional details. Citigroup Global Markets Inc. takes responsibility for the Product in the United States. Any orders by US investors resulting from the information contained in the Product may be placed only through Citigroup Global Markets Inc.

Important Disclosures for Morgan Stanley Smith Barney LLC Customers: Morgan Stanley & Co. LLC (Morgan Stanley) research reports may be available about the companies that are the subject of this Citi Research research report. Ask your Financial Advisor or use smithbarney.com to view any available Morgan Stanley research reports in addition to Citi Research research reports.

Important disclosure regarding the relationship between the companies that are the subject of this Citi Research research report and Morgan Stanley Smith Barney LLC and its affiliates are available at the Morgan Stanley Smith Barney disclosure website at www.morganstanleysmithbarney.com/researchdisclosures.

For Morgan Stanley and Citigroup Global Markets, Inc. specific disclosures, you may refer to www.morganstanley.com/researchdisclosures and https://www.citivelocity.com/cvr/eppublic/citi_research_disclosures.

This Citi Research research report has been reviewed and approved on behalf of Morgan Stanley Smith Barney LLC. This review and approval was conducted by the same person who reviewed this research report on behalf of Citi Research. This could create a conflict of interest.

The Citigroup legal entity that takes responsibility for the production of the Product is the legal entity which the first named author is employed by. The Product is made available in **Australia** through Citi Global Markets Australia Pty Ltd. (ABN 64 003 114 832 and AFSL No. 240992), participant of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. The Product is made available in Australia to Private Banking wholesale clients through Citigroup Pty Limited (ABN 88 004 325 080 and AFSL 238098). Citigroup Pty Limited provides all financial product advice to Australian Private Banking wholesale clients through bankers and relationship managers. If there is any doubt about the suitability of investments held in Citigroup Private Bank accounts, investors should contact the Citigroup Private Bank in Australia. Citigroup companies may compensate affiliates and their representatives for providing products and services to clients. The Product is made available in **Brazil** by Citigroup Global Markets Brasil - CCTVM SA, which is regulated by CVM - Comissão de Valores Mobiliários, BACEN - Brazilian Central Bank, APIMEC - Associação dos Analistas e Profissionais de Investimento do Mercado de Capitais and ANBID - Associação Nacional dos Bancos de Investimento. Av. Paulista, 1111 - 11º andar - CEP. 01311920 - São Paulo - SP. If the Product is being made available in certain provinces of **Canada** by Citigroup Global Markets (Canada) Inc. ("CGM Canada"), CGM Canada has approved the Product. Citigroup Place, 123 Front Street West, Suite 1100, Toronto, Ontario M5J 2M3. This product is available in **Chile** through Banchile Corredores de Bolsa S.A., an indirect subsidiary of Citigroup Inc., which is regulated by the

Superintendencia de Valores y Seguros. Agustinas 975, piso 2, Santiago, Chile. The Product is made available in **France** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. 1-5 Rue Paul Cézanne, 8ème, Paris, France. The Product is distributed in **Germany** by Citigroup Global Markets Deutschland AG ("CGMD"), which is regulated by Bundesanstalt fuer Finanzdienstleistungsaufsicht (BaFin). CGMD, Reuterweg 16, 60323 Frankfurt am Main. Research which relates to "securities" (as defined in the Securities and Futures Ordinance (Cap. 571 of the Laws of Hong Kong)) is issued in **Hong Kong** by, or on behalf of, Citigroup Global Markets Asia Limited which takes full responsibility for its content. Citigroup Global Markets Asia Ltd. is regulated by Hong Kong Securities and Futures Commission. If the Research is made available through Citibank, N.A., Hong Kong Branch, for its clients in Citi Private Bank, it is made available by Citibank N.A., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. Citibank N.A. is regulated by the Hong Kong Monetary Authority. Please contact your Private Banker in Citibank N.A., Hong Kong, Branch if you have any queries on or any matters arising from or in connection with this document. The Product is made available in **India** by Citigroup Global Markets India Private Limited, which is regulated by Securities and Exchange Board of India. Bakhtawar, Nariman Point, Mumbai 400-021. The Product is made available in **Indonesia** through PT Citigroup Securities Indonesia. 5/F, Citibank Tower, Bapindo Plaza, Jl. Jend. Sudirman Kav. 54-55, Jakarta 12190. Neither this Product nor any copy hereof may be distributed in Indonesia or to any Indonesian citizens wherever they are domiciled or to Indonesian residents except in compliance with applicable capital market laws and regulations. This Product is not an offer of securities in Indonesia. The securities referred to in this Product have not been registered with the Capital Market and Financial Institutions Supervisory Agency (BAPEPAM-LK) pursuant to relevant capital market laws and regulations, and may not be offered or sold within the territory of the Republic of Indonesia or to Indonesian citizens through a public offering or in circumstances which constitute an offer within the meaning of the Indonesian capital market laws and regulations. The Product is made available in **Israel** through Citibank NA, regulated by the Bank of Israel and the Israeli Securities Authority. Citibank, N.A., Platinum Building, 21 Ha'arba'ah St, Tel Aviv, Israel. The Product is made available in **Italy** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. Via dei Mercanti, 12, Milan, 20121, Italy. The Product is made available in **Japan** by Citigroup Global Markets Japan Inc. ("CGMJ"), which is regulated by Financial Services Agency, Securities and Exchange Surveillance Commission, Japan Securities Dealers Association, Tokyo Stock Exchange and Osaka Securities Exchange. Shin-Marunouchi Building, 1-5-1 Marunouchi, Chiyoda-ku, Tokyo 100-6520 Japan. If the Product was distributed by SMBC Nikko Securities Inc. it is being so distributed under license. In the event that an error is found in an CGMJ research report, a revised version will be posted on the Firm's Citi Velocity website. If you have questions regarding Citi Velocity, please call (81 3) 6270-3019 for help. The Product is made available in **Korea** by Citigroup Global Markets Korea Securities Ltd., which is regulated by the Financial Services Commission, the Financial Supervisory Service and the Korea Financial Investment Association (KOFIA). Citibank Building, 39 Da-dong, Jung-gu, Seoul 100-180, Korea. KOFIA makes available registration information of research analysts on its website. Please visit the following website if you wish to find KOFIA registration information on research analysts of Citigroup Global Markets Korea Securities Ltd. <http://dis.kofia.or.kr/fs/dis2/fundMgr/DISFundMgrAnalystPop.jsp?companyCd2=A03030&pageDiv=02>. The Product is made available in Korea by Citibank Korea Inc., which is regulated by the Financial Services Commission and the Financial Supervisory Service. Address is Citibank Building, 39 Da-dong, Jung-gu, Seoul 100-180, Korea. The Product is made available in **Malaysia** by Citigroup Global Markets Malaysia Sdn Bhd (Company No. 460819-D) ("CGMM") to its clients and CGMM takes responsibility for its contents. CGMM is regulated by the Securities Commission of Malaysia. Please contact CGMM at Level 43 Menara Citibank, 165 Jalan Ampang, 50450 Kuala Lumpur, Malaysia in respect of any matters arising from, or in connection with, the Product. The Product is made available in **Mexico** by Acciones y Valores Banamex, S.A. De C. V., Casa de Bolsa, Integrante del Grupo Financiero Banamex ("Accival") which is a wholly owned subsidiary of Citigroup Inc. and is regulated by Comisión Nacional Bancaria y de Valores. Reforma 398, Col. Juárez, 06600 Mexico, D.F. In **New Zealand** the Product is made available to 'wholesale clients' only as defined by s5C(1) of the Financial Advisers Act 2008 ("FAA") through Citigroup Global Markets Australia Pty Ltd (ABN 64 003 114 832 and AFSL No. 240992), an overseas financial adviser as defined by the FAA, participant of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. The Product is made available in **Pakistan** by Citibank N.A. Pakistan branch, which is regulated by the State Bank of Pakistan and Securities Exchange Commission, Pakistan. AWT Plaza, 1.1. Chundrigar Road, P.O. Box 4889, Karachi-74200. The Product is made available in the **Philippines** through Citicorp Financial Services and Insurance Brokerage Philippines, Inc., which is regulated by the Philippines Securities and Exchange Commission. 20th Floor Citibank Square Bldg. The Product is made available in the Philippines through Citibank NA Philippines branch, Citibank Tower, 8741 Paseo De Roxas, Makati City, Manila. Citibank NA Philippines NA is regulated by The Bangko Sentral ng Pilipinas. The Product is made available in **Poland** by Dom Maklerski Banku Handlowego SA an indirect subsidiary of Citigroup Inc., which is regulated by Komisja Nadzoru Finansowego. Dom Maklerski Banku Handlowego S.A. ul. Senatorska 16, 00-923 Warszawa. The Product is made available in the **Russian Federation** through ZAO Citibank, which is licensed to carry out banking activities in the Russian Federation in accordance with the general banking license issued by the Central Bank of the Russian Federation and brokerage activities in accordance with the license issued by the Federal Service for Financial Markets. Neither the Product nor any information contained in the Product shall be considered as advertising the securities mentioned in this report within the territory of the Russian Federation or outside the Russian Federation. The Product does not constitute an appraisal within the meaning of the Federal Law of the Russian Federation of 29 July 1998 No. 135-FZ (as amended) On Appraisal Activities in the Russian Federation. 8-10 Gasheka Street, 125047 Moscow. The Product is made available in **Singapore** through Citigroup Global Markets Singapore Pte. Ltd. ("CGMSPL"), a capital markets services license holder, and regulated by Monetary Authority of Singapore. Please contact CGMSPL at 8 Marina View, 21st Floor Asia Square Tower 1, Singapore 018960, in respect of any matters arising from, or in connection with, the analysis of this document. This report is intended for recipients who are accredited, expert and institutional investors as defined under the Securities and Futures Act (Cap. 289). The Product is made available by The Citigroup Private Bank in Singapore through Citibank, N.A., Singapore Branch, a licensed bank in Singapore that is regulated by Monetary Authority of Singapore. Please contact your Private Banker in Citibank N.A., Singapore Branch if you have any queries on or any matters arising from or in connection with this document. This report is intended for recipients who are accredited, expert and institutional investors as defined under the Securities and Futures Act (Cap. 289). This report is distributed in Singapore by Citibank Singapore Ltd ("CSL") to selected Citigold/Citigold Private Clients. CSL provides no independent research or analysis of the substance or in preparation of this report. Please contact your Citigold/Citigold Private Client Relationship Manager in CSL if you have any queries on or any matters arising from or in connection with this report. This report is intended for recipients who are accredited investors as defined under the Securities and Futures Act (Cap. 289). Citigroup Global Markets (Pty) Ltd. is incorporated in the **Republic of South Africa** (company registration number 2000/025866/07) and its registered office is at 145 West Street, Sandton, 2196, Saxonwold. Citigroup Global Markets (Pty) Ltd. is regulated by JSE Securities Exchange South Africa, South African Reserve Bank and the Financial Services Board. The investments and services contained herein are not available to private customers in South Africa. The Product is made available in **Spain** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. 29 Jose Ortega Y Gasset, 4th Floor, Madrid, 28006, Spain. The Product is made available in the **Republic of China** through Citigroup Global Markets Taiwan Securities Company Ltd. ("CGMTS"), 14 and 15F, No. 1, Songzhi Road, Taipei 110, Taiwan and/or through Citibank Securities (Taiwan) Company Limited ("CSTL"), 14

and 15F, No. 1, Songzhi Road, Taipei 110, Taiwan, subject to the respective license scope of each entity and the applicable laws and regulations in the Republic of China. CGMTS and CSTL are both regulated by the Securities and Futures Bureau of the Financial Supervisory Commission of Taiwan, the Republic of China. No portion of the Product may be reproduced or quoted in the Republic of China by the press or any third parties [without the written authorization of CGMTS and CSTL]. If the Product covers securities which are not allowed to be offered or traded in the Republic of China, neither the Product nor any information contained in the Product shall be considered as advertising the securities or making recommendation of the securities in the Republic of China. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security or financial products. Any decision to purchase securities or financial products mentioned in the Product must take into account existing public information on such security or the financial products or any registered prospectus. The Product is made available in **Thailand** through Citicorp Securities (Thailand) Ltd., which is regulated by the Securities and Exchange Commission of Thailand. 18/F, 22/F and 29/F, 82 North Sathorn Road, Silom, Bangrak, Bangkok 10500, Thailand. The Product is made available in **Turkey** through Citibank AS which is regulated by Capital Markets Board. Tekfen Tower, Eski Buyukdere Caddesi # 209 Kat 2B, 23294 Levent, Istanbul, Turkey. In the **U.A.E**, these materials (the "Materials") are communicated by Citigroup Global Markets Limited, DIFC branch ("CGML"), an entity registered in the Dubai International Financial Center ("DIFC") and licensed and regulated by the Dubai Financial Services Authority ("DFS") to Professional Clients and Market Counterparties only and should not be relied upon or distributed to Retail Clients. A distribution of the different Citi Research ratings distribution, in percentage terms for Investments in each sector covered is made available on request. Financial products and/or services to which the Materials relate will only be made available to Professional Clients and Market Counterparties. The Product is made available in **United Kingdom** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. This material may relate to investments or services of a person outside of the UK or to other matters which are not regulated by the FSA and further details as to where this may be the case are available upon request in respect of this material. Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. The Product is made available in **United States** by Citigroup Global Markets Inc, which is a member of FINRA and registered with the US Securities and Exchange Commission. 388 Greenwich Street, New York, NY 10013. Unless specified to the contrary, within EU Member States, the Product is made available by Citigroup Global Markets Limited, which is regulated by Financial Services Authority.

Pursuant to Comissão de Valores Mobiliários Rule 483, Citi is required to disclose whether a Citi related company or business has a commercial relationship with the subject company. Considering that Citi operates multiple businesses in more than 100 countries around the world, it is likely that Citi has a commercial relationship with the subject company.

Many European regulators require that a firm must establish, implement and make available a policy for managing conflicts of interest arising as a result of publication or distribution of investment research. The policy applicable to Citi Research's Products can be found at https://www.citivelocity.com/cvr/eppublic/citi_research_disclosures.

Compensation of equity research analysts is determined by equity research management and Citigroup's senior management and is not linked to specific transactions or recommendations.

The Product may have been distributed simultaneously, in multiple formats, to the Firm's worldwide institutional and retail customers. The Product is not to be construed as providing investment services in any jurisdiction where the provision of such services would not be permitted.

Subject to the nature and contents of the Product, the investments described therein are subject to fluctuations in price and/or value and investors may get back less than originally invested. Certain high-volatility investments can be subject to sudden and large falls in value that could equal or exceed the amount invested. Certain investments contained in the Product may have tax implications for private customers whereby levels and basis of taxation may be subject to change. If in doubt, investors should seek advice from a tax adviser. The Product does not purport to identify the nature of the specific market or other risks associated with a particular transaction. Advice in the Product is general and should not be construed as personal advice given it has been prepared without taking account of the objectives, financial situation or needs of any particular investor. Accordingly, investors should, before acting on the advice, consider the appropriateness of the advice, having regard to their objectives, financial situation and needs. Prior to acquiring any financial product, it is the client's responsibility to obtain the relevant offer document for the product and consider it before making a decision as to whether to purchase the product. With the exception of our product that is made available only to Qualified Institutional Buyers (QIBs) and other product that is made available through other distribution channels only to certain categories of clients to satisfy legal or regulatory requirements, Citi Research concurrently disseminates its research via proprietary and non-proprietary electronic distribution platforms. Periodically, individual Citi Research analysts may also opt to circulate research posted on such platforms to one or more clients by email. Such email distribution is discretionary and is done only after the research has been disseminated via the aforementioned distribution channels. Citi Research simultaneously distributes product that is limited to QIBs only through email distribution.

The level and types of services provided by Citi Research analysts to clients may vary depending on various factors such as the client's individual preferences as to the frequency and manner of receiving communications from analysts, the client's risk profile and investment focus and perspective (e.g. market-wide, sector specific, long term, short-term etc.), the size and scope of the overall client relationship with Citi and legal and regulatory constraints. Citi Research product may source data from dataCentral. dataCentral is a Citi Research proprietary database, which includes Citi estimates, data from company reports and feeds from Reuters and Datastream.

© 2013 Citigroup Global Markets Inc. Citi Research is a division of Citigroup Global Markets Inc. Citi and Citi with Arc Design are trademarks and service marks of Citigroup Inc. and its affiliates and are used and registered throughout the world. All rights reserved. Any unauthorized use, duplication, redistribution or disclosure of this report (the "Product"), including, but not limited to, redistribution of the Product by electronic mail, posting of the Product on a website or page, and/or providing to a third party a link to the Product, is prohibited by law and will result in prosecution. The information contained in the Product is intended solely for the recipient and may not be further distributed by the recipient to any third party. Where included in this report, MSCI sourced information is the exclusive property of Morgan Stanley Capital International Inc. (MSCI). Without prior written permission of MSCI, this information and any other MSCI intellectual property may not be reproduced, redisseminated or used to create any financial products, including any indices. This information is provided on an "as is" basis. The user assumes the entire risk of any use made of this information. MSCI, its affiliates and any third party involved in, or related to, computing or compiling the information hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability or fitness for a particular purpose with respect to any of this information. Without limiting any of the foregoing, in no event shall MSCI, any of its affiliates or any third party involved in, or related to, computing or compiling the information have any liability for any damages of any kind. MSCI, Morgan Stanley Capital International and the MSCI indexes are services marks of MSCI and its affiliates. The Firm accepts no liability whatsoever for the actions of third parties. The Product may provide the addresses of, or contain hyperlinks to, websites. Except to the extent to which the Product refers to website material of the Firm, the Firm has not reviewed the linked site. Equally, except to the extent to which the Product refers to website material of the Firm, the Firm takes no responsibility for, and makes no representations or warranties whatsoever as to, the data and information contained therein. Such address or hyperlink

(including addresses or hyperlinks to website material of the Firm) is provided solely for your convenience and information and the content of the linked site does not in anyway form part of this document. Accessing such website or following such link through the Product or the website of the Firm shall be at your own risk and the Firm shall have no liability arising out of, or in connection with, any such referenced website.

ADDITIONAL INFORMATION IS AVAILABLE UPON REQUEST
