

Credit

26 May 2011 | 21 pages

Global Structured Credit Strategy

- **New issue already close to 2010 volumes, will grow** – 2011 YTD volume is \$3.7 bn across nine deals, compared to \$4.1 bn in 2010. New deals and refinancings in the pipeline mean we are likely to exceed 2010 volumes before quarter-end.
- **CLO spreads, and new-issue funding costs, at tight** – With CLO costs of funding falling 40bps over the past couple of months, CLO secondary spreads have also come in. Triple-As, Double-As and Single-As are at their tightest for the year.
- **Managing spread versus collateral quality in CLOs** – Our CLO comparison shows that higher spreads does not necessarily mean lower loan ratings, a source of manager-alpha that equity investors should be considering.
- **Banks buy more securities, positive for CLOs** – FDIC data and conversations with bank treasury clients reveal that shrinking loan volumes and lower margins have driven clients towards securities, initially agency MBS, but also corporates.
- **US versus Euro CLO equity return attribution** – Our detailed feature this week identifies five key components to try to explain why European CLO equity is paying 15 points less than US equity. We find that differences in leverage and collateral spread and the presence of Libor floors in US loans dwarfs other components such as management fees and the basis in floating-rates.
- **Quanto CDS as a way of participating in peripheral story** – We think the market is underestimating the possible Euro depreciation if a few countries, even if considered peripheral, default. We would buy Quanto CDS on these names.
- **Could CRE CDOs follow CLO recovery** – Given US insurance sector involvement with commercial real estate (CRE) as well as pivotal to the new issue CLO market, we think whole-loan CRE CDOs could make a slow comeback.

Ratul Roy

+1-212-723-6043
 ratul.roy@citi.com

Mikhail Foux

+1-212-723-9353
 mikhail.foux@citi.com

Michael Hampden-Turner

+44-20-7986-3445
 michael.hampdenturner@citi.com

Eduard Trampolsky

+1-212-816-2748
 eduard.trampolsky@citi.com

Thomas Rose

+1-212-723-9422
 thomas.rose@citi.com

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

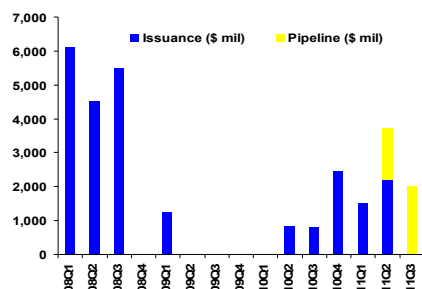
Citi Investment Research & Analysis is a division of Citigroup Global Markets Inc. (the "Firm"), which does and seeks to do business with companies covered in its research reports. As a result, investors should be aware that the Firm may have a conflict of interest that could affect the objectivity of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

Contents

Structured Credit Market Color	3
CLO Primary – Firing on All Cylinders	3
Secondary Spreads Tighter	3
Managing Spread versus Rating	3
Can the CRE CDO Engine be Restarted	4
Banks Buy Securities – Positive for CLOs	5
Credit Demand Down	5
Loan Margins Down	5
For Now Mostly Agency MBS, but Will Change	5
Quanto CDS and Euro Depreciation	6
US vs. Euro CLO Equity – Return Attribution	7
Lower CLO Equity Returns in Europe	7
Five Key Components	7
Leveraged Asset Spread Effect	8
Pulling it all Together	11
Appendix	13
Appendix II. Recent Publications	17
Appendix A-1	19

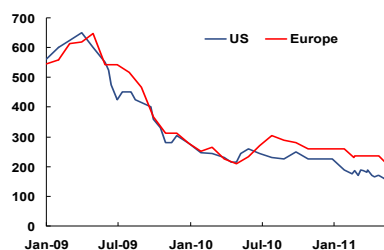
Structured Credit Market Color

Figure 1. US CLO Issuance



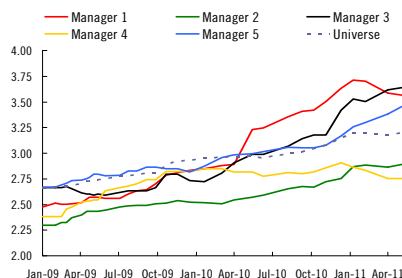
Source: Citi Investment Research and Analysis

Figure 2. Generic Triple-A CLO Spreads



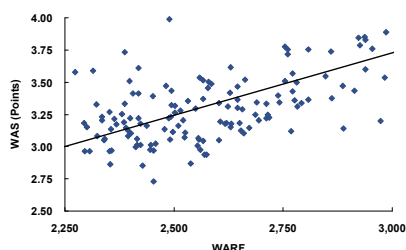
Source: Citi Investment Research and Analysis

Figure 3. Portfolio WAS (percent) for Select US CLO Managers



Source: Citi Investment Research and Analysis

Figure 4. WAS (weighted average spread) and WARF of 2007 US Vintage CLOs



Source: Citi Investment Research and Analysis

CLO Primary – Firing on All Cylinders

The CLO market seems to have found its rhythm, with three deals, BMI CLO I, Symphony VII CLO and ING 2011-1 CLO priced within the past two weeks. Accounting for these three deals, 2011 YTD volume has reached \$3.7 billion across nine deals, just slightly under the \$4.1 billion of CLOs priced through the entire 2010. More importantly though, there are several new deals (e.g. LCM, Apollo, CIFIC) as well as refinancings of existing CLOs in the pipeline (Figure 1), suggesting we're likely to see a handful of new prints even before the quarter ends. For now, we expect primary CLO issuance in 2011 to be around \$10 billion (in line with our year-end forecasts) though the figure can be higher if the recent return of banks and foreign investors pushes down funding costs even further and boosts equity returns. Finally, although it is a bit early to speak about primary issuance in 2012, one thing is quite certain to us – there will be quite a bit of it. With CLO costs of funding falling at least 40bps over the past couple of months (and likely to fall further), we expect the entire class of 2010 CLOs to get refinanced, contributing to ongoing CLO primary issuance.

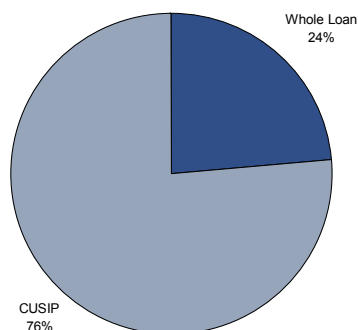
Secondary Spreads Tighter

Fueled by continuing spread tightening in the primary market, CLO secondary spreads have also come in. Triple-As that started the year around 200bps are now in 140-160 range. At the same time, Double-As and Single-As too are at their tightest for the year while junior mezz is within reach of their tightest levels too. The question, though, is how much further spreads, particularly senior spreads, can tighten. We think quite a bit. First, from a relative value perspective, CLOs are still cheap to alternatives, such as corporates and other securitized products, suggesting that relative value will eventually resurface. Furthermore, the ongoing return of investors to CLO primary is likely to push primary spreads down, affecting the secondary. A lot, however, will depend on the overall macro environment. As we have learned over the past year, spreads tightening and market jitters don't go well together, regardless of fundamentals.

Managing Spread versus Rating

Some managers do a much better job of managing the attractions of high portfolio spread with the risks of lower rated collateral. Indeed, let's have a look at Figure 3 which plots median collateral spread of the US CLO universe and five large CLO managers. It can be seen that several managers have significantly higher spread in their portfolios than others. For similar capital structures, wider spreads mean significantly higher excess cash flows for the equity. As an example, 50bps of difference in collateral spread between two CLOs with similar capital structures means roughly 6 points of equity distribution on an annual basis. There are however inherent risks in higher spreads portfolios. First, such portfolios are more likely to get refinanced, particularly in a benign credit environment, resulting in lower excess spread. Moreover, such higher spread portfolios (at least in theory) carry a higher risk of default, which also should be taken into consideration. Yet, opportunities for relative value plays are abundant. As Figure 4 shows, investors can find CLO portfolios with range of spreads as wide as 50-60bps for the similar level of credit risk (WARF). For those investors who are willing to look around and wait for the right transaction, the difference in equity cashflows is substantial.

Figure 5. Breakdown of US CRE CDO Universe by Collateral Type



Source: Citi Investment Research and Analysis

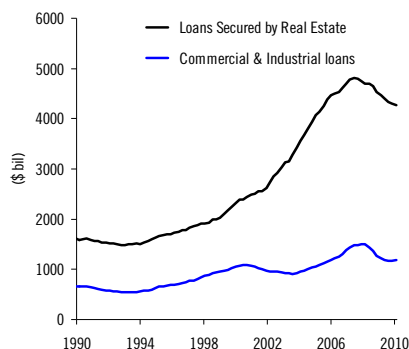
Can the CRE CDO Engine be Restarted

As the CLO, ABS and CMBS primary markets gain momentum, market participants are looking at other areas of structured finance to see what other products have proved themselves through the crisis, and hopefully can be brought back to life. CRE (Commercial Real Estate) CDOs may be one such product, although a lot of trust building will have to take place first. As a background, at its height in 2007, the total outstanding CRE CDO market in the US grew to about \$90 billion. The amount was split into two uneven segments – CUSIP CRE CDOs (about 76 percent) and whole loan CRE CDOs (Figure 5). Some CDOs were a combination of the two, i.e. their collateral consisted of CMBS tranches and whole loans. CUSIP CRE CDOs represented a double-layer securitization, similar to that of ABS CDOs with the collateral being junior tranches of CMBS and sometimes even tranches of other CRE CDOs. With commercial real estate prices taking a nose dive in 2008 and defaults followed should not be surprising that the fate of CUSIP CRE CDOs is similar to that of ABS CDOs. However CRE CDOs backed by whole loans is a completely different story. Though many loan-backed CRE CDOs have experienced their share of defaults and downgrades, performance of these deals is different from that of CUSIP CRE CDOs and overcollateralization levels in many loan-backed CRE CDOs are back to their pre-crisis level.

Though loan-backed CRE CDOs can be brought back to life, we see two major obstacles. The first is the rating hurdle. Any post-crisis criteria for CRE CDOs, if and when they apply, will likely lead to higher subordination levels below tranches despite better quality of current loans. This was what happened for CLOs. The second obstacle is the initial reluctance of investors to come back to the market – also something that the CLO market has been dealing with for the past two years. Yet, the CLO market can also be a source of inspiration. Although the recovery has been through a lot of pain, the new issue market is now on a firm footing. Encouragingly, the CLO market rebound was led by US insurance companies, for whom funding commercial real estate is the bread-and-butter of their business.

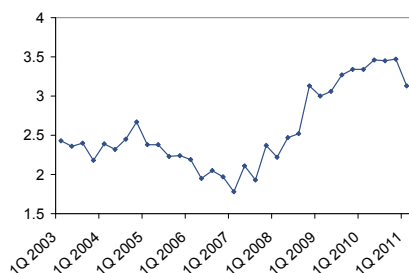
Banks Buy Securities – Positive for CLOs

Figure 6. Loans on US Bank Balance Sheets



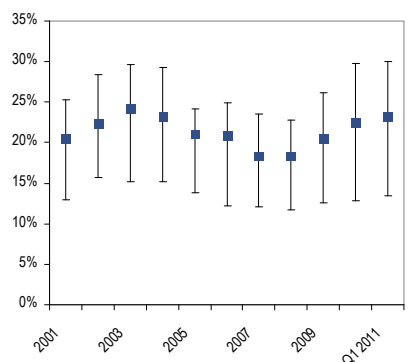
Source: FDIC

Figure 7. Spread-over-Fed Funds for Commercial & Industrial (C&I) loans, %



Source: FDIC, Citi Investment Research and Analysis

Figure 8. Securities-to-Total Assets for 100 largest US banks



Source: Highline FI and Citi

Credit Demand Down

US banks are having a bit of a problem in making margins. The problem is particularly acute for smaller banks. Large banks are seeing improving trends in lending, but the industry as a whole (Figure 6), especially smaller institutions, remain starved for loans. Meanwhile Fed data shows that banks, large and small, are sitting on more cash than they have in the past twelve months as deposits continue to roll in. It isn't just volumes that have gone down; competition for loans has also pulled in loan spreads.

Loan Margins Down

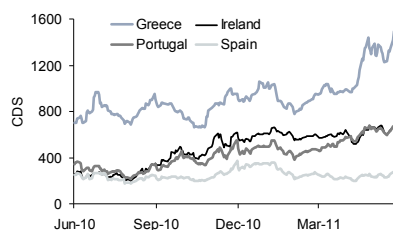
Anecdotal evidence from Citi sales covering US bank treasurers indicates that commercial and industrial (C&I) lending has been an improving spot for the largest US banks. Banks, very recently, have reported an increase in loan demand from their large, middle-market and small business customers. However, banks have eased terms for loans (Figure 7) as there is competition for good quality assets. More worryingly, cash and short-term investments remain at high levels on the balance sheets of large US companies, indicating limited funding needs. Faced with reduced spreads and lending volumes, it comes as no surprise, therefore, that bank treasurers are looking at other ways of supplementing income from bank balance sheets.

For Now Mostly Agency MBS, but Will Change

Conversations with our bank treasury clients also reveal that they have beefed up their holdings of securities, to counteract disappointing loan production. Figure 8 shows the data on total bank securities holdings for the top 100 banks, through the first quarter of 2011. The average ratio of total securities-to-total assets was at a two-decade high of 23 percent at March 2011, only once previously attained at December 2003. Though most of the security portfolio comprised increasingly of agency MBS (at the expense of Treasuries), a growing number of regional banks are looking to invest in corporate bonds. Moreover, data from Citi's structured credit business shows that banks are taking an increasing share of CLO purchases (from a near-zero two years ago) in the primary and secondary markets. We have long-argued that the low risk-weighting and floating-rate coupon of senior structured credit assets should make them appealing for well-capitalized banks – we are starting to see this happen. It won't be smooth sailing, of course – many banks have to reduce their leverage and improve liquidity – but we are on the right track at last.

Quanto CDS and Euro Depreciation

Figure 9. Periphery 5-YR CDS Spreads



Source: Citi Investment Research and Analysis

The Quanto CDS market appears to be underestimating the possible depreciation of the currency if a few countries, even if they are considered peripheral, default. We discussed sovereign Quanto CDS last year ("[Sovereign Quanto Mechanics](#)") but due to renewed volatility in the sovereign space, and with periphery spreads pushing record wides (Figure 9), we feel that this topic is worth revisiting. Just to remind readers, Quanto CDS can be constructed by using offsetting positions for the same reference entity in different currencies. For example, one could sell €10 million in Euro-denominated Spanish 5-YR CDS at 206bp, while buying \$14.1 million in dollar-denominated Spanish 5-YR CDS at 275bp (assuming the EUR-USD exchange rate is 1.41). Why aren't the spreads of the two legs the same? For the simple reason that a credit event for Spain should cause Euro depreciation, resulting in a positive P&L for a seller of Quanto protection. Let's go through the cash flows, assuming 40% recovery and 25% Euro-USD depreciation:

One would pay: $€10 \times (1 - 0.4) = \$1.41 \times 0.75 \times 10 \times (1 - 0.4) = \6.35 million.

One would receive: $\$14.1 \times (1 - 0.4) = 8.45$ million. Net P&L: \$2.10 million.

Taking it one step further, the ratio of Quanto CDS to the 5-YR CDS spread, roughly represents the degree of Euro devaluation as a result of a sovereign credit event. The latest Quanto CDS spreads, ratios and yearly changes are shown in Figure 10.

Figure 10. European 5-YR Quanto CDS (Mid-Market Spreads)

Countries	8-Jun-10			11-May-11			23-May-11		
	5-YR CDS	Quanto CDS	Ratio	5-YR CDS	Quanto CDS	Ratio	5-YR CDS	Quanto CDS	Ratio
AUSTRIA	74	-21	28%	66	-27	41%	66	-25	38%
BELGIUM	108	-28	26%	143	-39	27%	160	-39	24%
FRANCE	77	-23	30%	75	-29	39%	77	-29	38%
GERMANY	43	-11	26%	39	-16	41%	40	-15	38%
GREECE	700	-70	10%	1300	-20	2%	1425	-20	1%
IRELAND	260	-47	18%	668	-40	6%	662	-40	6%
ITALY	228	-39	17%	155	-43	28%	172	-46	27%
PORTUGAL	345	-57	17%	645	-45	7%	668	-45	7%
SPAIN	250	-53	21%	246	-66	27%	275	-69	25%

Source: Citi Investment Research and Analysis

Compared to last year, there is a greater divergence of the market's views on the impact that a particular sovereign default can have on the currency. Whereas the default of some of the peripherals (notably Greece, Ireland and Portugal) is expected to have a negligible impact on the Euro (right-most column of Figure 10), the impact one of the core nations (for example, Germany) defaulting is, rightfully, much more severe. We do not disagree with this broad premise (default of Germany would likely send off a global tsunami), but think that there are some mispricings, presenting interesting opportunities.

In particular, we think the numbers relating to the impact of the three peripherals on the list is too low, and recommend taking the other side of the trade – buying Quanto CDS. Most of the other numbers make more sense to us. Italy and Spain are now viewed as much more systemic to the European Union, compared to the rest of periphery names. On the opposite side of the peripherals, the ratios for Austria and Belgium are at 38% and 24%, respectively. These numbers seem high to us, given the size of these sovereigns, unless one believes that the rest of the EU members will have problems ahead of them. As such, we like selling Quanto CDS on these names.

US vs. Euro CLO Equity – Return Attribution

Lower CLO Equity Returns in Europe

It is well documented that the performance of European CLO equity has been significantly worse than that of its US counterparts. In our study, “*CLO Equity – Performing as Marketed*” we have shown that, for fully-paying equity, recent annualized distributions to European CLO equity have been on average 15 points lower than in the US. Furthermore even now, almost two years after the credit markets started recovering, 30 percent of European CLO equity is still starved of cash flows. For comparison, more than 90 percent of US CLOs are receiving distributions with annualized distributions of roughly 26 percent the in first quarter of 2011.

Some underperformance has to do with credit. Based on the number of issuers, Europe has experienced higher number of loan defaults than the US. Recoveries in Europe tend to be lower, partly due to the high incurrence of mezzanine loans in CLO portfolios. Furthermore, once a company defaults, workout proceeding tend to last longer, denting into overcollateralization levels and potentially trimming cash flows to equity for a longer period.

Five Key Components

However, as we argue below, the European CLO structure plays an equally, if not more important role, in outperformance of US CLO Equity versus Europe. Below we will try to perform an in-depth attribution of this outperformance.

First, let's do the math. The formula below shows the annual amount of interest received by CLO Equity, as a percent of equity notional.

$$Equity = \left((Libor_{Assets} + Spread_{Assets}) - \frac{N-1}{N} (Libor_{Liab} + Spread_{Liab}) - (Fee_{Mgmt} + Fee_{Other}) \right) * N$$

In the above formula N denotes leverage. The first term in equation relates to asset income, the middle term relates to the weighted average liability spread, and the last relates to the management (we exclude incentive fees) and other fees. Adding the component of loan Libor floor, which is present in significant number in US CLO portfolios and rearranging some of the members, the formula can be written in the following way:

$$Equity = (Libor_{Assets} + Spread_{Assets}) + ((N-1) * (Libor_{Assets} - Libor_{Liab})) + ((N-1) * (Spread_{Assets} - Spread_{Liab})) - N * (Fee_{Mgmt} + Fee_{Other}) + \alpha * N * \max(Libor_{Floor} - Libor_{Assets}, 0)$$

In the formula above, α denotes the percentage of assets in the collateral that have Libor floor.

Before we continue, there are two key facts that are very important. First the leverage in US CLO structures is significantly higher than that in Europe, with median of 12.5 compared to 10 times leverage in Europe. The difference, we believe, is direct result of lower diversity of Euro CLO structures. At the same time, the weighted average spread of CLO liabilities in Europe and the US is roughly the same for the majority of 06-70 vintage CLOs transactions, at around 50bps.

Equipped with these two key facts, we are now ready to perform attribution of difference between European and US CLO equity returns. The formula above has five components and we will analyze these components one by one.

1. Leveraged Asset Spread Effect: $((N-1) * (Spread_{Assets} - Spread_{Liab}))$

$$2. \text{Base Floating Rate Mismatch: } ((N - 1) * (Libor_{Assets} - Libor_{Liab}))$$

$$3. \text{Libor Floor: } \alpha * N * \max(Libor_{Floor} - Libor_{Assets}, 0)$$

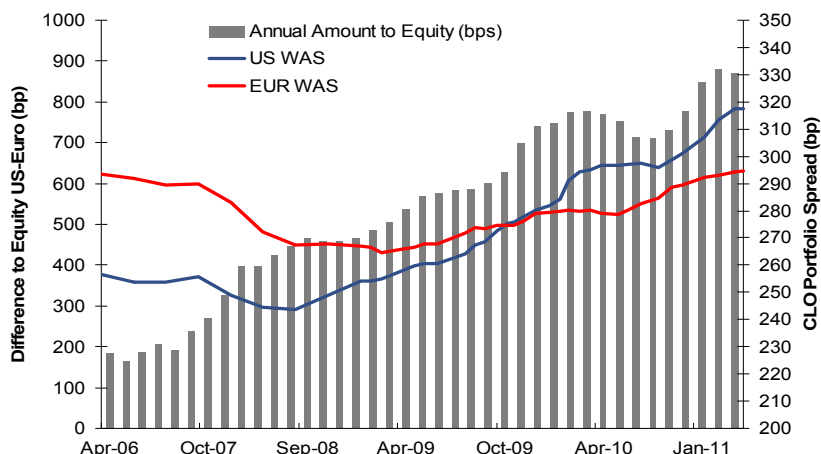
$$4. \text{Management Fee: } N * (Fee_{Mgmt} + Fee_{Other})$$

$$5. \text{Collateral Interest Rate } (Libor_{Assets} + Spread_{Assets})$$

Leveraged Asset Spread Effect

First, let's start with the first component of the equation which deals with the leveraged effect of spread differential between CLO assets and liabilities (or simply CLO arb). Substituting numbers for leverage, assets spreads, and CLO liability spreads we can see that leverage and spread differences play a major role in the difference in performance of US and CLO Equity. At current levels the excess of US CLO equity over Europe, attributable to difference between spreads and leverage, stands at an impressive 870bp.

Figure 11. Effect of Leverage and Assets Spreads to CLO Equity (US vs. Europe)



Source: Citi Investment Research and Analysis

The situation though has not always been like this. Back in 2006 and 2007, when the absolute levels of spreads were lower, both in US and Europe, and spreads on European loans were about 40bps wider than in the US the positive effect of higher leverage in US structures relatively to Euro CLOs was not so pronounced. Indeed in 2006 and 2007 the difference in equity payments attributable to leverage and CLO arb was only 200bps higher, making US and European CLO Equity comparable in models and marketing materials.

Figure 12 below shows the matrix of outperformance of US Equity over Europe due to effect of leverage, with yellow square highlighting the approximate current situation. As can be seen from the figure, unless Euro loan spreads are wider than US loans by more than 50bps, the higher leverage in US CLOs holds the upper hand.

Figure 12. Matrix of Outperformance of US over Europe at Different Spread and Spread Differential Levels.

		Spread Differential (US vs Europe)							
		-40	-30	-10	0	10	20	30	40
US Loan Spread Level	240	115	205	385	475	565	655	745	835
	260	165	255	435	525	615	705	795	885
	280	215	305	485	575	665	755	845	935
	300	265	355	535	625	715	805	895	985
	320	315	405	585	675	765	855	945	1035
	340	365	455	635	725	815	905	995	1085
	360	415	505	685	775	865	955	1045	1135
	380	465	555	735	825	915	1005	1095	1185
	400	515	605	785	875	965	1055	1145	1235
	420	565	655	835	925	1015	1105	1195	1285
	440	615	705	885	975	1065	1155	1245	1335
	460	665	755	935	1025	1115	1205	1295	1385
	480	715	805	985	1075	1165	1255	1345	1435

Source: Citi Investment Research and Analysis

For those looking to dwell into some mathematical details behind the matrix, the formula below allows to see the difference in CLO equity payments that is only attributable to leveraged spread.

$$\Delta = (N_{US} - 1) * (AssetSpread_{US} - LiabSpread_{US}) - (N_{Eur} - 1) * (AssetSpread_{Eur} - LiabSpread_{Eur}) = (N_{US} - 1) * AssetSpread_{US} - (N_{Eur} - 1) * AssetSpread_{Eur} - 50 * (N_{US} - N_{Eur})$$

Note in the formula above we put 50bp as spread on CLO liabilities in US and Europe. After we substitute the values for leverage (12.5 and 10 for US and Europe respectively), the formula can be simplified to the following:

$$\Delta = 9 * (AssetSpread_{US} - AssetSpread_{Eur}) + 2.5 * AssetSpread_{US} - 125$$

Base Floating Rate Gap

With the analysis of the most important component behind us, we continue our analysis with the second component, which represents the leveraged difference in the floating component of interest on CLO assets and liabilities. As a reminder, loans have the option at each payment date to reset their base floating rate (e.g. 1M Libor, 3M Libor, 6M Libor) whereas for CLO liabilities the base rate is fixed through the life of the transaction. In the US it is typically 3-Month Libor while in Europe it is typically 6-Month Libor.

Figure 13. Estimating Interest Rate Gap between CLO Assets and Liabilities for US and Europe

	US	Europe
Collat Based on 1-Month Rate	42%	55%
Collat Based on 3-Month Rate	58%	26%
Collat Based on 6-Month Rate	0%	19%
Median 1Month – 3 Month Libor Basis (bps)	6.0	24.1
Median 1Month – 6 Month Libor Basis (bps)	20.6	43.6
Median 3 Month – 6 Month Libor Basis (bps)	15.0	17.4
Basis Between CLO Assets and Liabilities	2.52 = (.42*6 + .58*0)	20.91 = (.55*43.6 + .26*17.4)

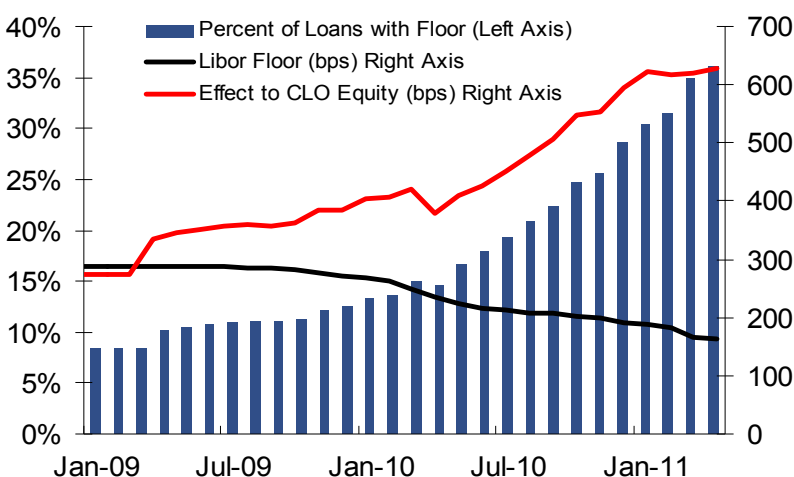
Source: Citi Investment Research and Analysis

From Figure 13 above we can see that for the US the negative effect of floating rate basis between CLO assets and liabilities (including effect of leverage) is equal to $(12.5-1)*2.52 = 29\text{bp}$. On the other hand, for Europe the effect is 188bps, hence, roughly 150bps of higher CLO equity payment in the US can be attributed to better floating rate match between CLO assets and liabilities.

Libor Floor Impact

Now, let's evaluate the third component of the equation, which deals with the effect of the Libor floor. Generally speaking, very few loans, if any, have Libor floor in Europe. On the contrary, in the US, in order to compete with high-yield bond markets, the proportion of loans that have Libor floor has been steadily increasing. As of now, roughly 40 percent of loans in US CLO portfolios have Libor floor with weighted average value of 150bps. Substituting those two numbers in the formula, we can see that currently roughly $625 = 0.4*12.5*\max(150-25,0)$ bps of higher returns in US CLO equity can be attributed to presence of Libor floors. The number has been changing over time (Figure 14). If we take the average since Jan 2009 we can say that over past two years roughly 450 bps in US equity returns can be attributed to the presence of Libor floors in underlying loans.

Figure 14. Attribution of Higher Returns of US CLO Equity Due to Presence of Libor Floor

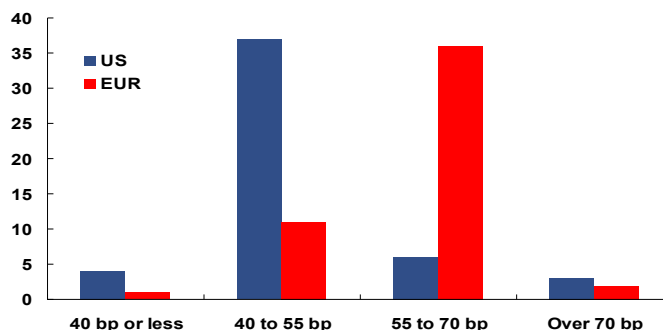


Source: Citi Investment Research and Analysis, S&P Leveraged Commentary and Data

Fee Difference Effect (or Lack of It)

The fourth component doesn't present too much interest. The fees, such as trustee fees and other agency fees, and other are comparable in both US and Europe. Management fees are somewhat higher in Europe vs. US (65bp vs. 50bp, Figure 15). However after applying the effect of leverage $10*65$ vs. $12.5*50$ it seems that little, if any, of equity returns discrepancy can be attributed to higher management fees in Europe.

Figure 15. Distribution of Management Fees in US and Europe

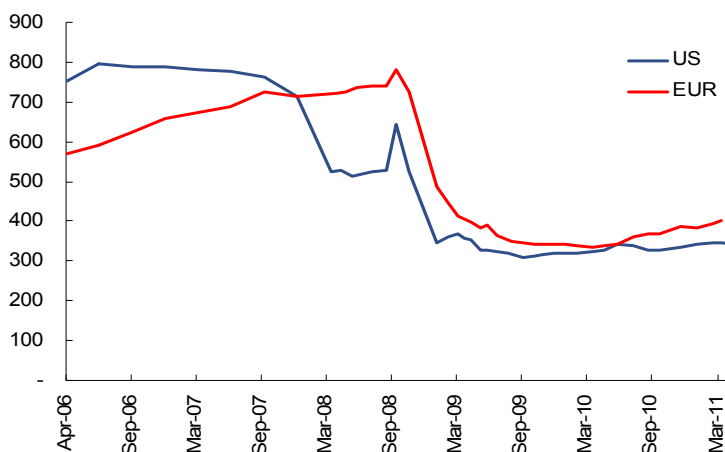


Source: Citi Investment Research and Analysis

Difference in Asset Interest

The last component of the equation that we evaluate in fact denotes interest on loans in CLO portfolio. Currently, the difference between interest on loans in US and European CLO portfolios is roughly 50bps with Europe being higher. Over the time though the difference between interest on loans in US and Europe has been changing but has always been within 150bps. Thus the maximum of overall higher interest on European loans is 150bps favoring Euro CLO Equity.

Figure 16. Difference on Total Interest in US and European Loans



Source: Citi Investment Research and Analysis

Pulling it all Together

Of the 15 points in observed differences in the payouts of US and European CLO Equity, the impact of the differences in leverage, collateral spread and the presence of Libor floors in US loans (the first and third factors in our list) is overwhelming. We found other components such as differences in management fees and the basis in floating-rate not to be very significant. We also did not take into account that European portfolios delevered more than their US counterparts, sustained more losses, and were (in most cases) able to build less par.

However, as time passes the situation may become less unfavorable for European CLOs. As interest rates rise, the effect of Libor floors will likely diminish. Furthermore, as US loans continue repricing at tighter spreads the difference between US and Euro loan spreads will decrease (and possibly become negative), decreasing the effects of leveraged spread differences. However, even if defaults remain low and interest rates increase, we expect annual CLO equity payments attributable to structural differences to be at least 500-600 bps higher in US than in Europe, suggesting that the average difference of 25-30 points between US and European Equity price makes complete sense.

Appendix

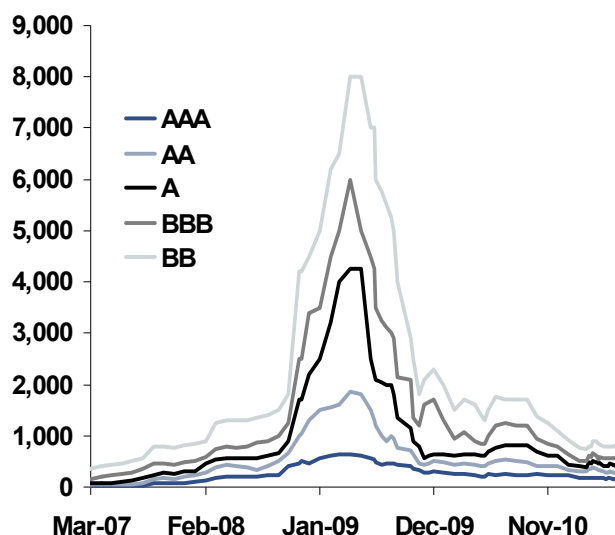
Cash Flow CDO Market

Figure 17. Secondary Cash Flow CDO Spreads/Prices

Collateral Type	AAA	AA	A	BBB	BB
US HY CLO (Spreads) – 25-May-11	150	250	400	550	810
US HY CLO (Prices) – 25-May-11	Low 90s – Mid 90s	Mid 80s – High 80s	High 70s – Mid 80s	Mid 70s – High 70s	Low 70s – High 70s
Euro HY CLO (Spreads) – 1-May-11	210	390	520	780	1400
Euro HY CLO (Prices) – 1-May-11	Low 90s – Mid 90s	Low 80s – Mid 80s	Low 70s – High 70s	High 60s – Mid 70s	Mid 60s – Low 70s

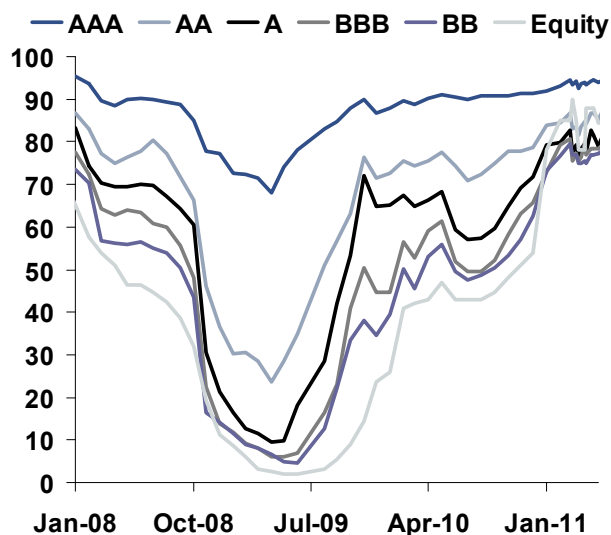
Source: Citi Investment Research and Analysis

Figure 18. US CLO Tranche Spreads



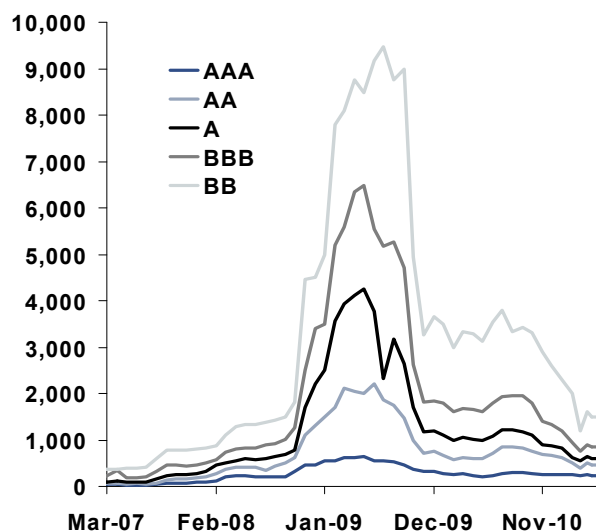
Source: Citi Investment Research and Analysis

Figure 20. US CLO Tranche Prices



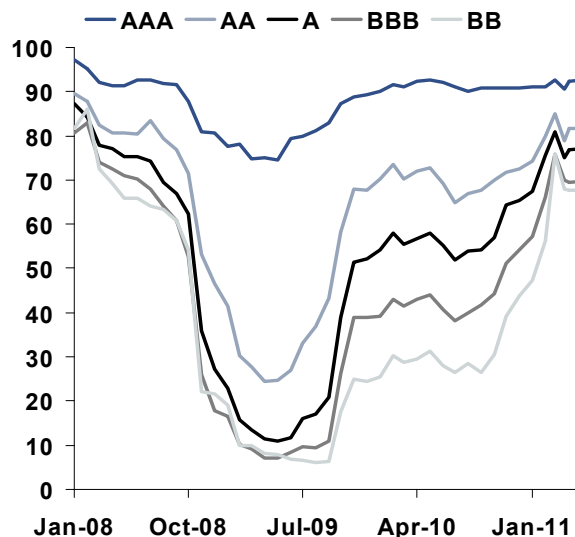
Source: Citi Investment Research and Analysis

Figure 19. European CLO Tranche Spreads



Source: Citi Investment Research and Analysis

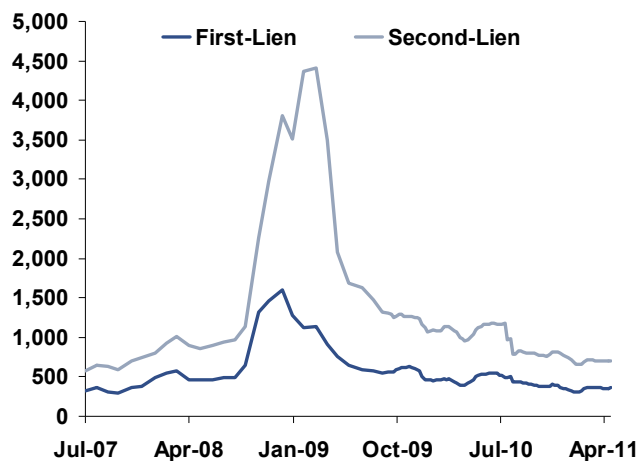
Figure 21. European CLO Tranche Prices



Source: Citi Investment Research and Analysis

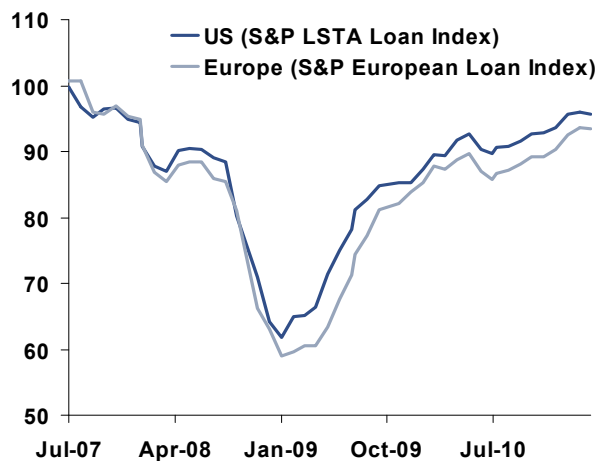
CLO Collateral

Figure 22. Avg First and Second-Lien Secondary Spreads to Maturity



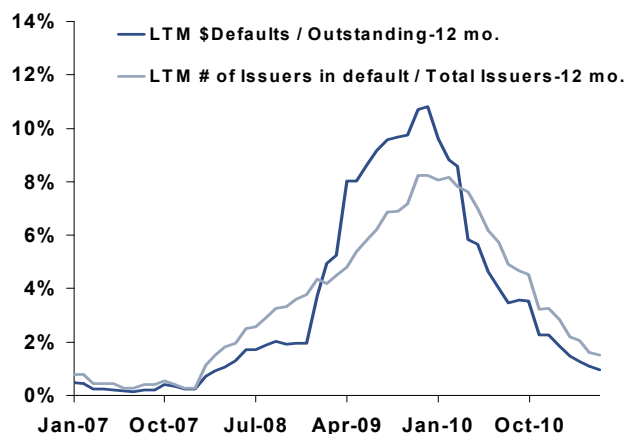
Source: Citi Investment Research and Analysis

Figure 23. Weighted Average Bid



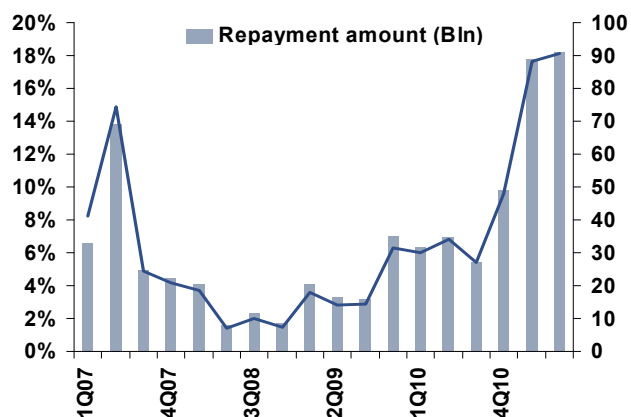
Source: Citi Investment Research and Analysis

Figure 24. Lagging 12mo. Default Rate by Principal Amount and # of Issuers



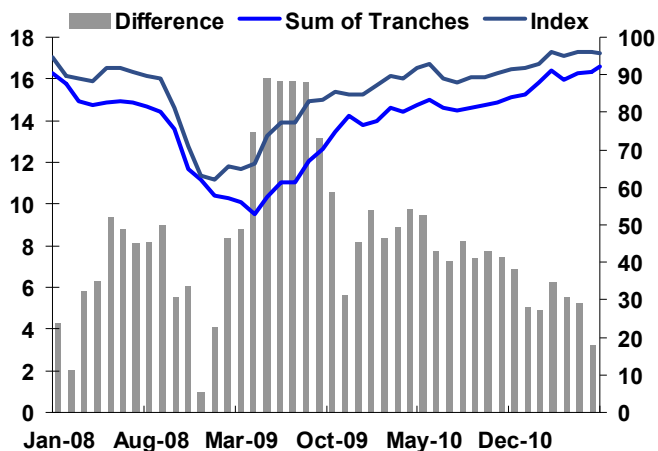
Source: Citi Investment Research and Analysis

Figure 25. Quarterly Repayment Rate and Repayment Amount



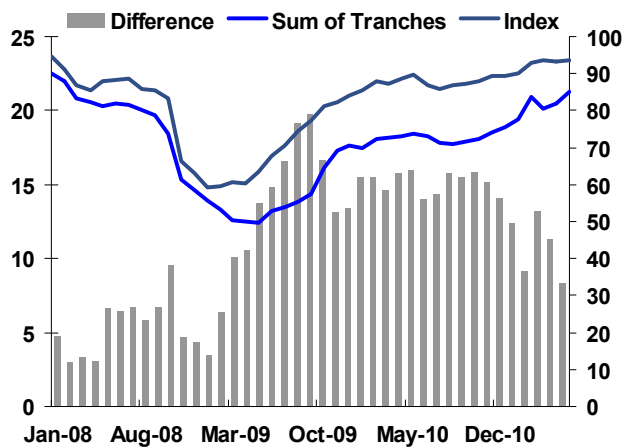
Source: Citi Investment Research and Analysis

Figure 26. Collateral/Tranche Arbitrage (US Deals)



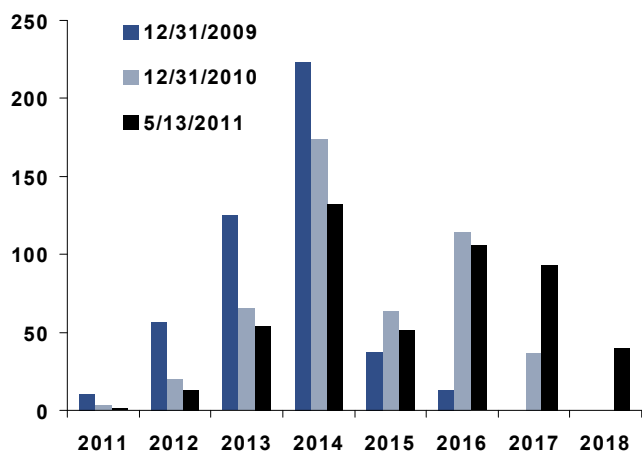
Source: Citi Investment Research and Analysis

Figure 27. Collateral/Tranche Arbitrage (EUR Deals)



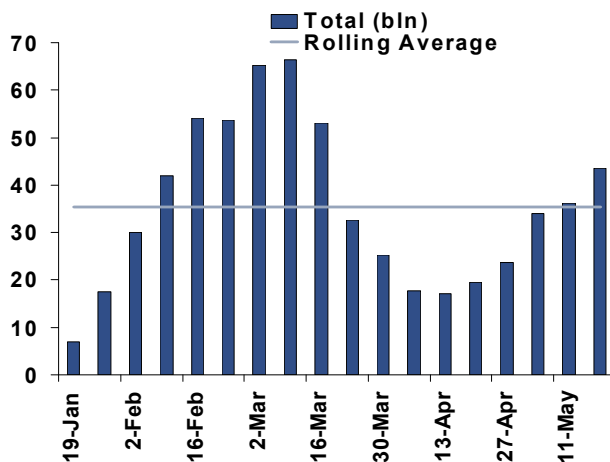
Source: Citi Investment Research and Analysis

Figure 28. Loan Distribution by Year of Maturity



Source: S&P

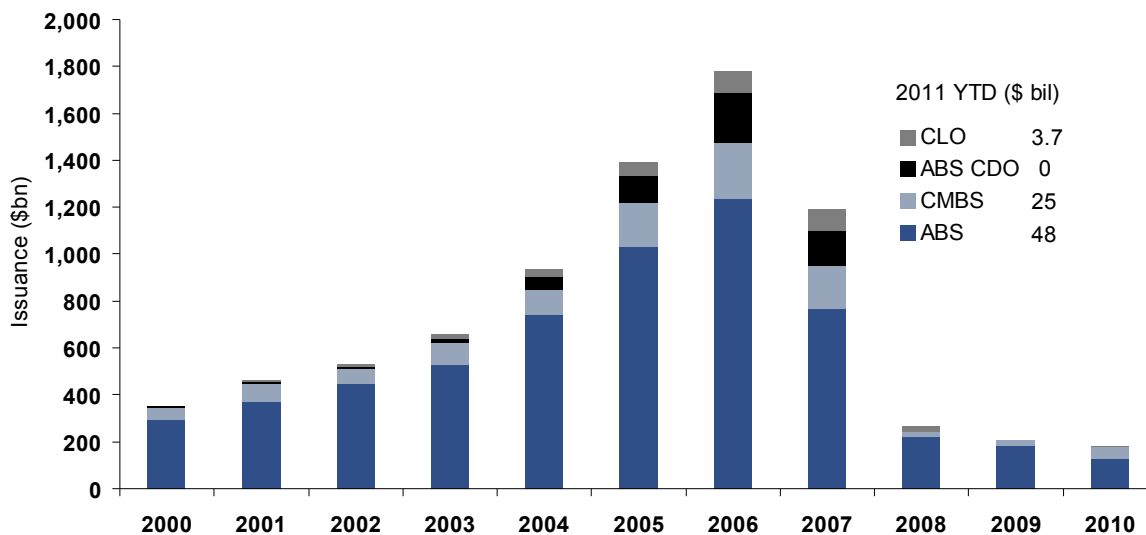
Figure 29. Institutional Loans Launched to Market (Rolling 30-Days)



Source: S&P

Securitized Products Issuance

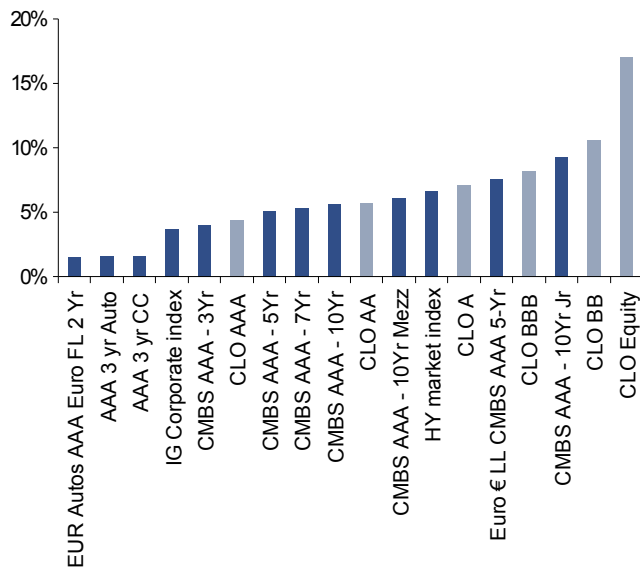
Figure 30. Year-to-Date CDO Issuance and Securitization Market Historical Issuance (\$bn)



Source: Citi Investment Research and Analysis

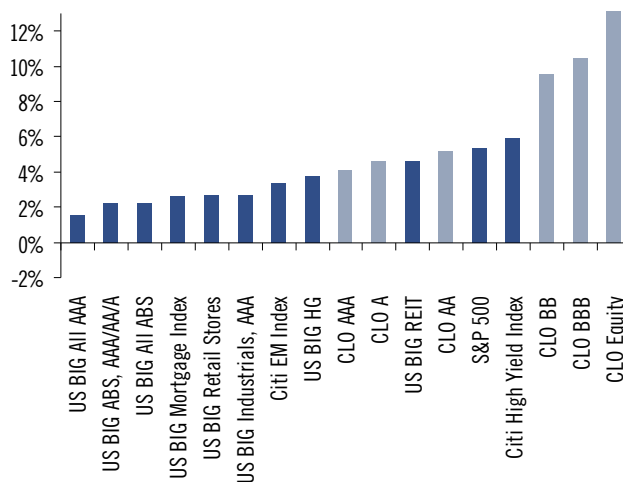
Securitized and Non-securitized Products Returns

Figure 31. Simple Yield



Source: Citi Investment Research and Analysis

Figure 32. Total Returns, 2011 (through 25-May-2011)



Source: Citi Investment Research and Analysis

Appendix II. Recent Publications

Figure 33. Recent Features

Date	Title	Description	Location on FI Direct
5 May 11	Mav Note Update	We recommend buying class B (mezz) or A1,A2 (senior).	Credit >> Global CDO
5 May 11	CLO New Issue Restarts	Two new deals price with tighter AAA spreads and more deals to come.	Credit >> Global CDO
12 Apr 11	CLO Retention Rule	We analyze the effects of a rule requiring managers to retain pieces of their CLOs	Credit >> Global CDO
6 Apr 11	US Struc Credit Conference Survey 2011	We ask 100 firms to fill out a survey on the future of the CLO market.	Credit >> Global CDO
18 Mar 11	Selloff May Provide an Entry Point	CLOs have given up most of their 2011 gains, will they recover?	Credit >> Global CDO
18 Mar 11	Will the Earthquake Have an Impact on Structured Credit	To what extent will the earthquake cause Japanese banks to sell CLO holdings.	Credit >> Global CDO
18 Mar 11	CLO Monitor	More and more euro equity has restored cashflows and WARF and CCC baskets remain in check	Credit >> Global CDO
18 Mar 11	Using Loans for CLO Hedging	We highlight how to hedge AAA CLOs with TRS	Credit >> Global CDO
28 Feb 11	CLOs Bracing for Calls	Many 2008 transactions might be called for financing, also old CLOs where NAV exceeds valuations are at risk	Credit >> Global CDO
26 Jan 11	CLO Equity – Performing as Marketed	A review of CLO equity performance as well as future predictions on returns	Credit >> Global CDO
12 Jan 11	Structured Credit Outlook 2011	2010 saw CLOs rally and expect the trend to continue into 2011 at a slower pace.	Credit >> Global CDO
10 Nov 10	TruPS Deferrals to Defaults: Is S&P Looking Backward	Many TruPS have resumed interest payments despite obligations that are deferring.	Credit >> Global CDO
27 Oct 10	Floating Rate Advantage of CLO Seniors	Interest rate risk makes CLO's attractive compared to corporates due to a floating rate.	Credit >> Global CDO
27 Oct 10	Defaults to Fall in 2011	Our econometric models anticipate a fall in default rates to 2% in January 2011.	Credit >> Global CDO
27 Oct 10	CRE CDOs Revisited	CRE CDOs, while not suitable for all, offer a CMBS like investment with higher risk-adjusted yield.	Credit >> Global CDO
12 Oct 10	CLO and Loan Market Update	September brought \$2.5 billion of BWICs, and there was increased demand for mezz.	Credit >> Global CDO
12 Oct 10	Synthetic Markets Update	We are now seeing a burst of demand for IG15 mezz.	Credit >> Global CDO
12 Oct 10	CLO Collateral Extensions	We analyze the likelihood of managers reinvesting and using "amend and extends" to lengthen the life of the deal.	Credit >> Global CDO
20 Sep 10	Hedging Tail Risk	Market turbulence has increased investors' fears about the pace of economic recovery and increased interest in hedging tail- or extreme risk.	Credit >> Global CDO
1 Jul 10	Structured Credit Market Update	While there is fresh supply for CLO secondary, investors are still mostly in the sidelines. Meanwhile, we expect higher prepayments speeds to translate to upgrades.	Credit >> Global CDO
1 Jul 10	Bank TruPS CDOs – A Recovery Play?	Given the signs of stabilization in the banking sector, second priority tranches (usually A2 tranche) of bank TruPS CDO seem to us to be an interesting way to benefit from an upcoming recovery.	Credit >> Global CDO
8 Jun 10	CLO Market and Trading Color	The widening spreads in CLO's provide an opportunity to buy, and Moody's follows S&P's lead in beginning to upgrade CLO tranches.	Credit >> Global CDO
8 Jun 10	CLO Monitor	An updated snapshot of the most relevant statistics for the CLO universe such as WARF, WAS, and triple-C Basket Size.	Credit >> Global CDO
8 Jun 10	Sovereign Quanto Mechanics	We think that the quanto levels are too high and recommend selling protection, more so for the high-beta corporates and sovereigns.	Credit >> Global CDO
13 May 10	Structured Credit Market Update	We analyze the trend in CLO spreads and liquidity and loan prepayment rates, the first upgrades of CLO tranches, and opportunities in synthetic IG Mezz tranches.	Credit >> Global CDO
21 Apr 10	Credit Derivatives – Sovereign Basket Focus	Investors should use high implied correlations in the sovereign FTD market to create a cheap short (or senior long) by playing baskets against single names.	Credit >> Global CDO
21 Apr 10	LCDX – Loan Prepayment Probability	The new bullet LCDS and LCDX14 contracts allow investors to ignore loan cancellation. Comparing LCDX13 to 14, we think the implied cancellation probability is too high.	Credit >> Global CDO
21 Apr 10	Saddle-up with Zero Coupon Tranches	POs offer a zero coupon bond-like structure on junior index and bespoke tranches. Their low initial prices and access to leverage with no credit line make them attractive.	Credit >> Global CDO
21 Apr 10	CLO Managers Buy More CLOs	Over the last year, CLO managers added \$650MM of mostly senior CLO debt to their deals.	Credit >> Global CDO
21 Apr 10	Structured Credit Market Update	At least three ABS CDOs are being unwound and will add to supply of senior tranches of CLOs and other CDOs.	Credit >> Global CDO
31 Mar 10	CLO New Issue Opens – But is it Value?	Tranches have more subordination and higher coupons that earlier vintage deals, and senior tranches still look cheap for their risk compared to corporates.	Credit >> Global CDO
31 Mar 10	CLO Manager Consolidation Continues	To date, nearly 40 US mandates have changed hands, and we are seeing some initial activity in Europe.	Credit >> Global CDO
31 Mar 10	CLO Monitor	An updated snapshot of the most relevant statistics for the CLO universe such as WARF, WAS, and triple-C Basket Size.	Credit >> Global CDO
31 Mar 10	LCDX Tranches – Half Empty or Half Full?	Credit investors have regained an appetite for CSOs, but the recovery has not been as dramatic as that in loans and CLOs.	Credit >> Global CDO
9 Mar 10	Expressing a View on Credit-FX Correlation	Credit investors who want to try to benefit from, or manage the risks due to, the correlation in credit spread and currency movements can utilize quanto CDS to express their views.	Credit >> Global CDO
9 Mar 10	Investing in Vintage iTraxx Tranches	We believe shorter dated vintage iTraxx tranches offer interesting buy and hold opportunities.	Credit >> Global CDO
8 Mar 10	CLO Equity Returns – Who Managed to Deliver	We evaluate the performance of equity tranches in roughly 90 percent of outstanding transactions, spanning across 132 managers in the US and 55 in Europe.	Credit >> Global CDO

Source: Citi Investment Research and Analysis

Figure 34. Market Primers and Handbooks

Date	Title	Description	Location on FI Direct
28 Mar 11	Bank Loan Total Return Swaps	A primer on Total Return Swaps.	Credit >> Global CDO
13 May 10	MAV Senior Notes – Valuable Though Complex	A primer on CAD-Denominated MAV notes created from the restructuring of Canadian CP liabilities backed by leveraged corporate super-senior risk.	Credit >> Global CDO
13 Apr 07	A Simple Guide to Subprime Mortgages, CDO, and Securitization	A primer on how securitization transforms home loans into bonds and bonds into CDOs.	Credit >> Global CDO
8 Feb 07	Credit Default Swaps	A simple primer for credit default swaps.	Credit >> Global Derivatives
6 Sep 06	The CDO of CDOs Handbook	A primer on the increasingly popular CDO squared products.	Credit >> Global CDO
20 Jun 06	Credit Default Swaps on CDOs	ISDA recently published a template for CDS on CDO debt tranches with ongoing pay-as-you-go settlement and with physical settlement following a credit event. The article explores key features of the confirmation.	Credit >> Global CDO
23 May 06	Mezzanine ABS CDOs	An in-depth look at mezz ABS CDO equity and junior debt.	Credit >> Global CDO
20 Apr 06	Risky PV01 of a CDS Contract	Discussion of the calculation and the importance of Risky PV01.	Credit >> Global Derivatives
7 Feb 05	Hedging Credit Portfolios and Tranches with Payers	Crossover payer options can offer a cheap and liquid hedge against spread widening, especially in a low volatility environment.	Credit >> Global Derivatives
19 Jan 06	Credit Derivatives Indexes	A primer on the credit derivatives index market.	Credit >> Global Derivatives
31 Oct 05	Understanding Tranches Today	A guide to our daily tranche report and P&L attribution methodology.	Credit >> Global Derivatives
31 Oct 05	An Introduction to Commercial Real Estate CDOs	An introduction to commercial real estate (CRE) CDOs.	Credit >> Global CDO
30 Sep 05	High-Grade ABS CDOs	Analyzing the performance of the HG CDOs through a bottom-up analysis.	Credit >> Global CDO
27 Jun 05	Leveraged Loan Handbook	A guide to the corporate loan market.	Credit >> Global CDO
27 May 05	Credit CPPI	A primer on constant proportion portfolio insurance (CPPI).	Credit >> Global Derivatives
7 Apr 05	Trading Tranches On CDX.EM Diversified: Hedging and Leverage	An intro to trading tranches on CDX.EM Diversified.	Credit >> Global Derivatives
23 Mar 05	Understanding CDO-Squareds	A primer on how CDO-squareds work, and helpful hints on how to find value.	Credit >> Global CDO
22 Nov 04	The CMCDS Handbook	Introduction to and trading strategies for constant maturity credit default swaps.	Credit >> Global Derivatives
3 Nov 04	Middle-Market CLO Handbook	Primer on middle-market CLOs.	Credit >> Global CDO
22 Sep 04	Traxxing the Dragons — Investment Strategies With iTraxx Asia Indexes and Tranches	A guide to investment strategies with iTraxx Asia indexes and tranches.	Credit >> Global Derivatives
16 Sep 04	Trading Credit Tranches — Taking Default Correlation out of the Black Box	A guide to investing and trading in credit tranches.	Credit >> Global Derivatives
28 Apr 04	The Structured Credit Handbook	Compilation of all Citi structured credit handbooks and primers.	Credit >> Global CDO
27 Apr 04	A Primer on Single-Tranche CDOs	A primer on single-tranche CDOs.	Credit >> Global Derivatives
14 Apr 04	Citigroup's Primer on Credit Default Swaptions	All you needed to know about credit default swaptions.	Credit >> Global Derivatives
22 Mar 04	Trading the CDX.EM iBoxx	The new CDS benchmark for emerging markets.	Credit >> Global Derivatives
19 Mar 04	Excerpt from the BMRS: New Roll of the iBoxx CDX Indexes	Overview of iBoxx roll on March 20, 2004, and its implication for investors.	Credit >> Global Derivatives
1 Mar 04	High-Yield iBoxx Indexes — New Benchmarks for the High-Yield Market	Using iBoxx as a key instrument for positioning in the high-yield market.	Credit >> Global Derivatives
4 Feb 04	The CDO of ABS Handbook	A primer on CDOs backed by structured finance securities.	Credit >> Global CDO
3 Feb 04	The CLO Handbook	A primer on collateralized loan obligations.	Credit >> Global CDO
23 Jun 03	Synthetic Arbitrage CDOs	Discussion of recent improvements in synthetic arbitrage CDOs.	Credit >> Global Derivatives
31 Dec 02	Single Name Credit Default Swaps — A Users Guide	A guide to single-name CDS.	Credit >> Global Derivatives
20 Aug 01	First-to-Default (FTD) Baskets	A primer on FTD basket swaps.	Credit >> Global Derivatives

Source: Citi Investment Research and Analysis

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 Investment Research & Analysis product ("the Product"), please contact Citi Investment Research & Analysis, 388 Greenwich Street, 28th Floor, New York, NY, 10013, Attention: Legal/Compliance. 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 www.citigroupgeo.com. 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.

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 Inc

Ratul Roy; Mikhail Foux; Eduard Trampolsky; Thomas Rose

Citigroup Global Markets Ltd

Michael Hampden-Turner

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 Investment Research & Analysis (CIRA) does not set a predetermined frequency for publication, if the Product is a fundamental research report, it is the intention of CIRA 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. Incorporated (Morgan Stanley) research reports may be available about the companies that are the subject of this Citi Investment Research & Analysis (CIRA) research report. Ask your Financial Advisor or use smithbarney.com to view any available Morgan Stanley research reports in addition to CIRA research reports.

Important disclosure regarding the relationship between the companies that are the subject of this CIRA 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. The required disclosures provided by Morgan Stanley and Citigroup Global Markets, Inc. on Morgan Stanley and CIRA research relate in part to the separate businesses of Citigroup Global Markets, Inc. and Morgan Stanley that now form Morgan Stanley Smith Barney LLC, rather than to Morgan Stanley Smith Barney LLC in its entirety. For Morgan Stanley and Citigroup Global Markets, Inc. specific disclosures, you may refer to www.morganstanley.com/researchdisclosures and https://www.citigroupgeo.com/geopublic/Disclosures/index_a.html. This CIRA 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 CIRA. 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 Citigroup 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. If the Product is made available in Hong Kong by, or on behalf of, Citigroup Global Markets Asia Ltd., it is attributable to Citigroup Global Markets Asia Ltd., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. Citigroup Global Markets Asia Ltd. is regulated by Hong Kong Securities and Futures Commission. If the Product is made available in Hong Kong by The Citigroup Private Bank to its clients, it is attributable to Citibank N.A., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. The Citigroup Private Bank and Citibank N.A. is regulated by the Hong Kong Monetary Authority. 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. Foro Buonaparte 16, 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 Nikko Cordial Securities Inc. it is being so distributed under license. In the event that an error is found in a CGMJ research report, a revised version will be posted on the Firm's Global Equities Online (GEO) website. If you have questions regarding GEO, 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 110-180, 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 Malaysia by Citigroup Global Markets Malaysia Sdn Bhd, which is regulated by Malaysia Securities Commission. Menara Citibank, 165 Jalan Ampang, Kuala Lumpur, 50450. 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 through Citigroup Global Markets New Zealand Ltd. (Company Number 604457), a Participant of the New Zealand Exchange Limited and regulated by the New Zealand Securities Commission. Level 19, Mobile on the Park, 157 Lambton Quay, Wellington. 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 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., a Capital Markets Services Licence holder, and regulated by Monetary Authority of Singapore. 1 Temasek Avenue, #39-02 Millenia Tower, Singapore 039192. 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. This report is distributed in Singapore by Citibank Singapore Ltd ("CSL") to selected Citigroup/Citigold Private Clients. CSL provides no independent research or analysis of the substance or in preparation of this report. Please contact your Citigroup/Citigold Private Client Relationship Manager in CSL if you have any queries on or any matters arising from or in connection with this report. 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 Gassef, 4th Floor, Madrid, 28006, Spain. The Product is made available in Taiwan through Citigroup Global Markets Taiwan Securities Company Ltd., which is regulated by Securities & Futures Bureau. No portion of the report may be reproduced or quoted in Taiwan by the press or any other person. 14 and 15F, No. 1, Songzhi Road, Taipei 110, Taiwan. If the Product is related to non-Taiwan listed securities, neither the Product nor any information contained in the Product shall be considered as advertising the securities or making recommendation of the securities. 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 Büyükdere 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 ("DFSA") to Professional Clients and Market Counterparties only and should not be relied upon or distributed to Retail Clients. A distribution of the different CIRA 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 CIRA's Products can be found at www.citigroupgeo.com.

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. CIRA concurrently disseminates its research via proprietary and non-proprietary electronic distribution platforms. Periodically, individual analysts may also opt to circulate research 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.

© 2011 Citigroup Global Markets Inc. Citi Investment Research & Analysis 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
