

# Banks - Thailand

# Misconceptions about virtual banking

**Industry Overview** 

#### Virtual banking licenses could drive sector funding cost

The Bank of Thailand (BoT) will accept applications for virtual banking licenses from 20 Mar-19 Sept to be followed by a nine-month selection process and a year of preparation for operation. As a result, virtual banks should begin to operate around 1H26. We believe it will be a challenge for virtual banks to succeed in Thailand. First, they do not have superior cost efficiency to traditional banks, in our view. Second, Thailand has a shortage of data/data infrastructure. Third, virtual banks will be subject to strict BoT regulation. Moreover, we expect the size of virtual banks to be small and do not expect them to have a material impact on our bank estimates/valuations. Nonetheless, virtual banks are expected to compete for deposits at the initial stage and could drive funding cost.

#### Most virtual banks lack scale and are not profitable

In South Korea, China, and the UK, virtual banks' asset sizes account for ≤ 1% of the whole banking system's assets. We believe virtual banks have failed to make inroads because 1) traditional banks have improved their mobile applications, 2) not every customer is online-literate, and 3) there is a lack of trust given the absence of physical branches. Note that a number of virtual banks have failed and exited the market.

#### No lower cost to serve than traditional banks

Most virtual banks have a comparable cost-to-asset ratio to traditional banks. Despite the absence of physical branches/ATM networks, virtual banks must invest considerably

#### Require credit data quality and infrastructure

To develop specialized products and enhance risk models, virtual banks require credit and alternative data. This is a challenge because Thailand lacks data/data infrastructure, both for alternative and credit data. Even though the Thai Bankers' Association targets to adopt an open banking system in 2026, we believe there will be a delay.

### Challenges from strict BoT regulations

One of the main issues with virtual banks is the tight regulation expected. Virtual banks would be subject to the same BoT regulations as traditional banks and may even face tighter scrutiny on some issues such as downtime for their operations.

#### Successful virtual bank business models

We have studied and found key success stories from three profitable virtual banks in three countries: Kakao Bank - South Korea, Webank - China, and Starling Bank - UK. We look at two business models: First, offering low-yield loans with a government guarantee, like Kakao Bank with housing deposit loans and Starling Bank with EUguaranteed small and medium-sized enterprise (SME) loans and mortgages. Second is the use of data and the ecosystem of a huge platform to improve the risk model and increase fee-based income, as Webank did in China.

BofA Securities participated in the preparation of this report, in part, based on information provided by Kiatnakin Phatra Securities Public Company Limited (Kiatnakin Phatra Securities). ^^^Kiatnakin Phatra Securities employees are not registered/qualified as research analysts under FINRA rules. Refer to "Other Important Disclosures" for information on certain BofA Securities entities that take responsibility for the information herein in particular jurisdictions.

BofA Securities does and seeks to do business with issuers 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. Refer to important disclosures on page 9 to 11.

12668594

08 March 2024

Equity ASEAN | Thailand Banks

Bay Tuntisrisuk, CFA ^^^ Research Analyst Kiatnakin Phatra Securities +66 2 305 9203 bay.tunt@kkpfg.com

#### History of virtual banks

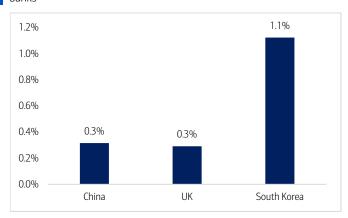
Most well-known virtual banks, such as N26, Monzo, Revolut, Starling Bank, Webank, and Kakao Bank, were founded between 2013 and 2016. Most of them began as Fintech to provide better mobile apps, greater interest rates, and lower or nil transaction fees, and then expanded to offer services to underserved or unserved clients. Hundreds of virtual banks have come into operation, but only a handful of them were profitable in 2022.

Our study of virtual banks in China, the UK, and South Korea found that they have significantly small asset sizes amounting to less than or equal to 1% of the banking system's total assets in 2022 (Exhibit 2). In our view, we believe there are three main reasons why virtual banks have not been able to take over the banking system: 1) traditional banks have improved their mobile applications to increase customer satisfaction to compete with virtual banks, 2) some customers are not well-versed in technology, and 3) and customers tend to trust traditional banks with physical branches rather than virtual banks with no branches.

# **Exhibit 1: Profitable virtual banks**Example of profitable virtual banks in 2022



**Exhibit 2: Virtual banks' total assets as a % of the banking system**Total assets of virtual banks are much smaller than those of traditional banks



Source: Banks, Central banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

#### Timeline of virtual banks in Thailand

Registration for virtual banking licenses will commence from 20 March and run until 19 September, after which the BoT and the Ministry of Finance (MoF) will take about nine months to screen applications and announce results in 2Q25. Those approved will have one year to prepare before launching their services in 1H26 (Exhibit 3). Even though the MoF said that there is no restriction on the number of licenses, we estimate that there will be around three because the BoT has limited staff to oversee the virtual banks. In recent years, we have seen news of some groups interested in virtual banking licenses, including 1) the consortium of Gulf Energy Development, Krungthai Bank, Advanced Info Service, and PTT Oil and Retail Business (OR); 2) the cooperation between Siam Commercial Bank (SCB) and Kakao Bank; 3) Ascend Money, a subsidiary of CP Group; and 4) Jaymart (JMART).

We believe the launch of virtual banks will have no impact on our estimates or valuations for banks since their size will most likely be very small; nonetheless, it may have a negative impact on financing costs in the early phase because we believe newcomers will fight to expand their deposit base so they will most likely have overlapping customers with some small banks or unsecured finance companies.



#### Exhibit 3: Thai virtual banks - Timeline

Virtual banks are expected to start operation in 1H26



Source: BoT, Kiatnakin Phatra Securities

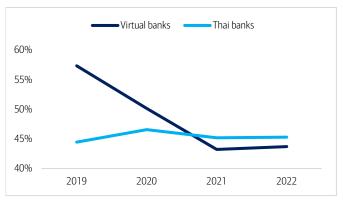
BofA GLOBAL RESEARCH

#### Huge IT expenses for both staff and infrastructure

Virtual banks' cost efficiency remained consistent in 2021-2022, similar to Thailand's traditional banks, with an average cost-to-total asset ratio of roughly 1.8%, slightly higher than the 1.7% average among Thai traditional banks (Exhibit 5). Despite having fewer employees owing to the lack of physical branches, virtual banks incur significant operational expenses, the majority of which are IT-related, including both IT staff and infrastructure. It is difficult to cut down on that cost since it is necessary for virtual banks to maintain their IT systems and networks to offer consumers trust (as there are no physical branches for customers to use when the system is down) and meet the BoT's requirement on limited downtime. As a result, we believe virtual banks do not have the benefit of cheaper costs to compete with traditional banks.

**Exhibit 4: Cost to income ratio** 

Virtual banks have slightly lower cost-to-income ratios than traditional banks

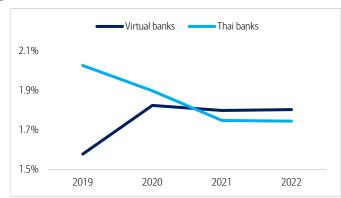


**Source:** Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

Exhibit 5: Cost to total asset ratio

Virtual banks have slightly higher cost-to-asset ratios than traditional banks



Source: Banks, Kiatnakin Phatra Securities

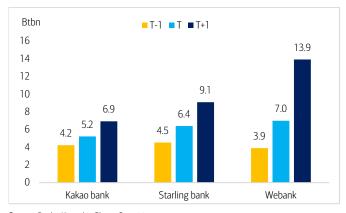
BofA GLOBAL RESEARCH

Kakao Bank, Starling Bank, and Webank incurred operational expenses of around Bt5-7bn in their first profitable year (Exhibit 6), which is a significant sum when compared to the BoT's minimum paid-in capital of Bt5bn. Furthermore, IT investment is not a one-time expense; it includes research and development (R&D) and cost maintenance to ensure continuous improvement. Thai traditional banks have spent more than Bt10bn (Exhibit 7), or about 0.2% of total assets, on IT over the previous six quarters, and this investment is expected to rise further. We expect virtual banks to spend more money on IT than traditional banks due to their limited downtime requirement.



# Exhibit 6: Virtual banks – Operating expenses at first profitable year (T)

At the first profitable year, virtual banks have operating expenses of Bt5-7bn

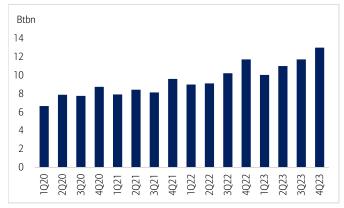


Source: Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

#### Exhibit 7: Thailand's banking system - IT expenses

IT expenses have continued to increase



Source: BoT. Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

#### Require credit data quality and infrastructure

To develop specialized products and enhance risk models, virtual banks require credit and alternative data. Thailand has a shortage of data and bad data infrastructure, both for alternative and credit data. The Thai Bankers' Association stated that open banking will begin in Thailand in 2026, however, we believe there may be a delay because of conflicts of interest. Without open banking, virtual banks need time and more capital to continue collecting data via trial and error to enhance their risk models.

#### **Challenges from strict BoT regulations**

One of the main issues with virtual banks is the tightening of BoT regulations. The BoT has stressed that virtual banks would be subject to the same regulations as traditional banks, as well as certain tighter requirements, such as limited downtime (Exhibit 3). Virtual banks must have paid-in capital of at least Bt5bn on the day of business commencement and up to Bt10bn before exiting the restricted period (the first three to five years). Existing commercial banks are limited to one virtual bank license per bank and are not permitted to utilize the mother banks' brands, trademarks, or symbols if they wish to operate a virtual bank.

The BoT requires a few key qualifications from virtual bank applicants that can be summed up as follows: 1) a viable and sustainable business model; 2) the ability to access, manage, secure, and use a variety of data types and the existence of a chief technological officer (CTO) and at least one director with at least three years of experience in digital services IT; and 3) strong governance, risk management, and financial position, as well as financial support from shareholders.

With the tighter regulations, we believe virtual banks will find it difficult to succeed due to the need to introduce innovative products and new value proposition to their clients, like start-ups, to compete with traditional banks.



#### Exhibit 8: Thai virtual banks - Requirements

Virtual banks have greater restrictions than traditional banks in terms of downtime



Source: BoT, Kiatnakin Phatra Securities

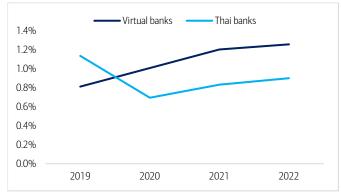
BofA GLOBAL RESEARCH

#### RoA and RoE higher than traditional banks

In 2022, virtual banks had an RoA of roughly 1.3%, which is higher than Thai traditional banks' 0.9% (Exhibit 9) due to higher non-interest income (Exhibit 10) while their RoE of 19.3% was greater than Thai traditional banks' 7.6% (Exhibit 11), owing mostly to higher leverage exceeding 10x versus Thai traditional banks' 7x (Exhibit 12). Given that the BoT will be regulating virtual banks similarly to traditional banks, Thai virtual banks should have a lower ROE than international virtual banks, owing to their lower leverage.

# Exhibit 9: RoA

Virtual banks' ROA is higher than Thai traditional banks

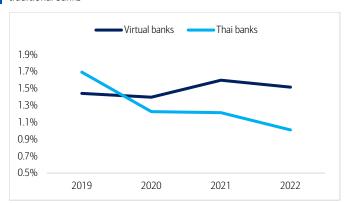


Source: Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

#### **Exhibit 10: Non-interest income to total assets**

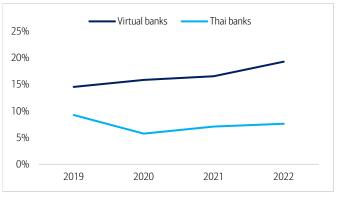
Virtual banks' non-interest income to total assets is higher than Thai traditional banks



**Source:** Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

**Exhibit 11: RoE**Virtual banks' RoE is higher than Thai traditional banks

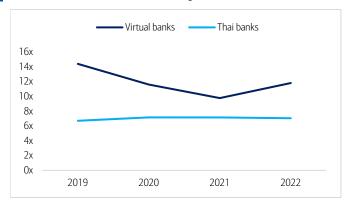


**Source:** Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

#### **Exhibit 12: Leverage ratio**

Thai traditional banks have a lower leverage than international virtual banks



Source: Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

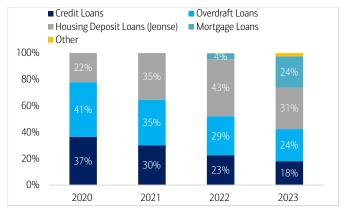
#### Heterogenous success stories for virtual banks

We summarize key success stories from three profitable virtual banks in three countries (Kakao Bank – South Korea, Webank – China, and Starling Bank – UK). The first success story is the offering of low-yield loans with a government guarantee, like Kakao Bank with housing deposit loans (Exhibit 13) and Starling Bank with EU-guaranteed SME loans and mortgages (Exhibit 14). Second is the usage of data and the ecosystems from their huge platforms to improve risk models and increase fee-based income, like what Webank did in China.

Even data-rich countries, such as the United States, have struggled to build a profitable high-yield loan virtual banking system (i.e., Marcus by Goldman Sachs). We think virtual banks might not be suitable for this business model (high-yield loans). With low data quality and no guaranteed loans, it is a challenge for virtual banks in Thailand to succeed, if they only focus on the unserved and underbanked segments, as the BoT wants.

Exhibit 13: Kakao Bank – Loan by segment
Kakao Bank's largest loan segment is housing deposit loans w

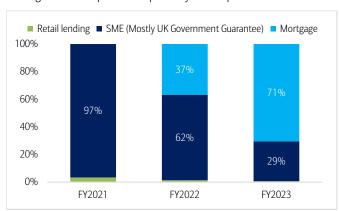
Kakao Bank's largest loan segment is housing deposit loans which are secured loans with guarantees



Source: Kakao Bank, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

**Exhibit 14: Starling Bank – Loan by segment**Starling Bank's loan portfolio is primarily made up of secured loans



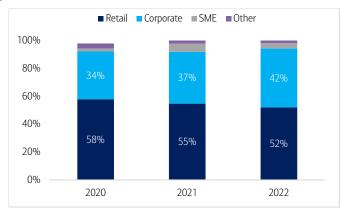
Source: Starling Bank, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH



#### Exhibit 15: Webank - Loan by segment

With the rich ecosystem of Wechat, Webank can strengthen its risk model and grow fee-based income to become a viable virtual bank

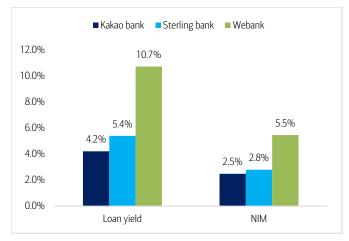


Source: Webank, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

#### Exhibit 16: Virtual banks' loan yield and NIM in 2022

Most profitable virtual banks have moderate loan yields and NIMs

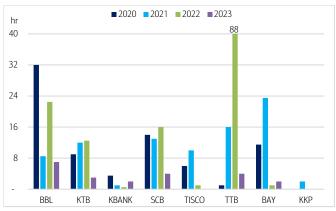


Source: Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

#### Exhibit 17: Thailand's banking system - Downtime

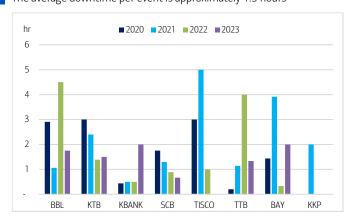
With increased IT investment, Thai banks have decreased downtime to less than eight hours by 2023



Source: Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

# **Exhibit 18: Thailand's banking system – Average downtime per event**The average downtime per event is approximately 1.5 hours



**Source:** BoT, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

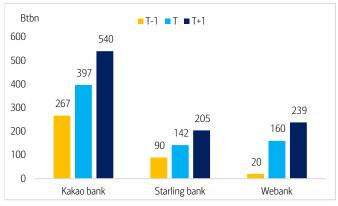
### Number of accounts and loans at first profitable year

If we look at the three profitable virtual banks (Kakao, Starling, and Webank), the required loan portfolio to reach breakeven is Bt142bn, but they have to depend on the loan mix. This suggests that virtual banks will require total equity of around Bt14.2bn with a 10% CET-1, which is greater than the minimum capital requirement of the BoT. If they incur a loss a few years before breakeven, they will need additional paid-in capital.

We provide one example of a non-profitable virtual bank, which is Mox, a Hong Kong virtual bank. Mox is a virtual bank backed by Standard Chartered, in partnership with Hong Kong Telecom, PCCW, and Trip.com. Mox was created in 2020 with paid-in capital of roughly Bt8bn. It received further capital injection of roughly Bt10bn to retain equity in the face of continued net losses. Mox has yet to break even with 1H23 loans totaling roughly Bt30bn.

#### Exhibit 19: Virtual banks - Loans at first profitable year (T)

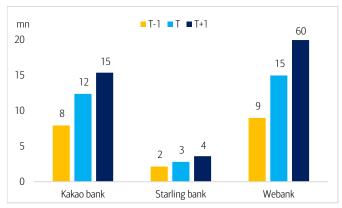
The lowest loans during the first profitable year were around Bt142bn



Source: Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

# **Exhibit 20: Virtual banks – No. of accounts at first profitable year (T)**The lowest number of accounts at the first profitable year was around 3mn



Source: Banks, Kiatnakin Phatra Securities

BofA GLOBAL RESEARCH

### **Special Disclosures**

Kiatnakin Phatra Securities does and seeks to do business with issuers 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. This report is issued and distributed outside Thailand solely by BofA Securities. Kiatnakin Phatra Securities is not licensed to provide advisory services outside Thailand. Investors should contact their BofA Securities representative or Merrill Global Wealth Management financial advisor if they have questions concerning this report or concerning the appropriateness of any investment idea described herein for such investor.

Kiatnakin Phatra Securities Public Company Limited ("KKPS") under its proprietary trading desk, may, from time to time, issue derivative warrants that have underlying securities contained or mentioned in this research report. Should KKPS be the issuer of the derivative warrants, KKPS may act as the market maker for such derivative warrants. As a result, investors should be aware that KKPS may have a conflict of interest that could affect the objectivity of this research report.



### **Disclosures**

### **Important Disclosures**

FUNDAMENTAL EQUITY OPINION KEY: Opinions include a Volatility Risk Rating, an Investment Rating and an Income Rating. VOLATILITY RISK RATINGS, indicators of potential price fluctuation, are: A - Low, B - Medium and C - High. INVESTMENT RATINGS reflect the analyst's assessment of both a stock's absolute total return potential as well as its attractiveness for investment relative to other stocks within its Coverage Cluster (defined below). Our investment ratings are: 1 - Buy stocks are expected to have a total return of at least 10% and are the most attractive stocks in the coverage cluster; 2 - Neutral stocks are expected to remain flat or increase in value and are less attractive than Buy rated stocks and 3 - Underperform stocks are the least attractive stocks in a coverage cluster. An investment rating of 6 (No Rating) indicates that a stock is no longer trading on the basis of fundamentals. Analysts assign investment ratings considering, among other things, the 0-12 month total return expectation for a stock and the firm's guidelines for ratings dispersions (shown in the table below). The current price objective for a stock should be referenced to better understand the total return expectation at any given time. The price objective reflects the analyst's view of the potential price appreciation (depreciation).

# Investment rating Total return expectation (within 12-month period of date of initial rating) Ratings dispersion guidelines for coverage cluster<sup>R1</sup>

 Buy
 ≥ 10%
 ≤ 70%

 Neutral
 ≥ 0%
 ≤ 30%

 Underperform
 N/A
 ≥ 20%

INCOME RATINGS, indicators of potential cash dividends, are: 7 - same/higher (dividend considered to be secure), 8 - same/lower (dividend not considered to be secure) and 9 - pays no cash dividend. Coverage Cluster is comprised of stocks covered by a single analyst or two or more analysts sharing a common industry, sector, region or other classification(s). A stock's coverage cluster is included in the most recent BofA Global Research report referencing the stock.

BofA Global Research personnel (including the analyst(s) responsible for this report) receive compensation based upon, among other factors, the overall profitability of Bank of America Corporation, including profits derived from investment banking. The analyst(s) responsible for this report may also receive compensation based upon, among other factors, the overall profitability of the Bank's sales and trading businesses relating to the class of securities or financial instruments for which such analyst is responsible.

#### **Other Important Disclosures**

From time to time research analysts conduct site visits of covered issuers. BofA Global Research policies prohibit research analysts from accepting payment or reimbursement for travel expenses from the issuer for such visits.

Prices are indicative and for information purposes only. Except as otherwise stated in the report, for any recommendation in relation to an equity security, the price referenced is the publicly traded price of the security as of close of business on the day prior to the date of the report or, if the report is published during intraday trading, the price referenced is indicative of the traded price as of the date and time of the report and in relation to a debt security (including equity preferred and CDS), prices are indicative as of the date and time of the report and are from various sources including BofA Securities trading desks.

The date and time of completion of the production of any recommendation in this report shall be the date and time of dissemination of this report as recorded in the report timestamp.

Recipients who are not institutional investors or market professionals should seek the advice of their independent financial advisor before considering information in this report in connection with any investment decision, or for a necessary explanation of its contents.

Officers of BofAS or one or more of its affiliates (other than research analysts) may have a financial interest in securities of the issuer(s) or in related investments. Refer to BofA Global Research policies relating to conflicts of interest.

"BofA Securities" includes BofA Securities, Inc. ("BofAS") and its affiliates. Investors should contact their BofA Securities representative or Merrill Global Wealth Management financial advisor if they have questions concerning this report or concerning the appropriateness of any investment idea described herein for such investor. "BofA Securities" is a global brand for BofA Global Research.

#### Information relating to Non-US affiliates of BofA Securities and Distribution of Affiliate Research Reports:

BofAS and/or Merrill Lynch, Pierce, Fenner & Smith Incorporated ("MLPF&S") may in the future distribute, information of the following non-US affiliates in the US (short name: legal name, regulator): Merrill Lynch (South Africa): Merrill Lynch South Africa (Pty) Ltd., regulated by The Financial Service Board; MLI (UK): Merrill Lynch International, regulated by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA); BofASE (France): BofA Securities Europe SA is authorized by the Autorité de Contrôle Prudential et de Résolution (ACPR) and regulated by the ACPR and the Autorité des Marchés Financiers (AMF). BofA Securities Europe SA ("BofASE") with registered address at 51, rue La Boétie, 75008 Paris is registered under no 842 602 690 RCS Paris. In accordance with the provisions of French Code Monétaire et Financier (Monetary and Financial Code), BofASE is an établissement de crédit et d'investissement (credit and investment institution) that is authorised and supervised by the European Central Bank and the Autorité de Contrôle Prudentiel et de Résolution (ACPR) and regulated by the ACPR and the Autorité des Marchés Financiers. BofASE's share capital can be found at www.bofaml.com/BofASEdisclaimer; BofA Europe (Milan); Bank of America Europe Designated Activity Company, Milan Branch, regulated by the Bank of Italy, the European Central Bank (ECB) and the Central Bank of Ireland (CBI); BofA Europe (Frankfurt): Bank of America Europe Designated Activity Company, Frankfurt Branch regulated by BaFin, the ECB and the CBI; BofA Europe (Madrid): Bank of America Europe Designated Activity Company, Sucursal en España, regulated by the Bank of Spain, the ECB and the CBI; Merrill Lynch (Australia): Merrill Lynch (Hong Kong): Merr (Asia Pacific) Limited, regulated by the Hong Kong Securities and Futures Commission (HKSFC); Merrill Lynch (Singapore): Merrill Lynch (Singapore) Pte Ltd, regulated by the Monetary Authority of Singapore (MAS); Merrill Lynch (Canada): Merrill Lynch (Canada): Merrill Lynch (Mexico): Merrill Ly de Bolsa, regulated by the Comisión Nacional Bancaría y de Valores; Merrill Lynch (Argentina): Merrill Lynch Argentina SA, regulated by Comisión Nacional de Valores; BofAS Japan: BofA Securities Japan Co., Ltd., regulated by the Financial Services Agency; Merrill Lynch (Seoul): Merrill Lynch International, LLC Seoul Branch, regulated by the Financial Supervisory Service; Merrill Lynch (Taiwan): Merrill Lynch Securities (Taiwan) Ltd., regulated by the Securities and Futures Bureau; BofAS India: BofA Securities India Limited, regulated by the Securities and Exchange Board of India (SEBI); Merrill Lynch (Israel): Merrill Lynch (I Financial Services Authority (DFSA); Merrill Lynch (Brazil): Merrill (Br Merrill Lynch Kingdom of Saudi Arabia Company, regulated by the Capital Market Authority.

This information: has been approved for publication and is distributed in the United Kingdom (UK) to professional clients and eligible counterparties (as each is defined in the rules of the FCA and the PRA) by MLI (UK), which is authorized by the PRA and regulated by the FCA and the PRA - details about the extent of our regulation by the FCA and PRA are available from us on request; has been approved for publication and is distributed in the European Economic Area (EEA) by BofASE (France), which is authorized by the ACPR and regulated by the ACPR and the AMF; has been considered and distributed in Japan by BofAS Japan, a registered securities dealer under the Financial Instruments and Exchange Act in Japan, or its permitted affiliates; is issued and distributed in Hong Kong by Merrill Lynch (Hong Kong) which is regulated by HKSFC; is issued and distributed in Taiwan by Merrill Lynch (Taiwan); is issued and distributed in India by BofAS India; and is issued and distributed in Singapore to institutional investors and/or accredited investors (each as defined under the Financial Advisers Regulations) by Merrill Lynch (Singapore) (Company Registration No 198602883D). Merrill Lynch (Singapore) is regulated by MAS. Merrill Lynch Equities (Australia) Limited (ABN 65 006 276 795), AFS License 235132 (MLEA) distributes this information in Australia only to 'Wholesale' clients as defined by s.761G of the Corporations Act 2001. With the exception of Bank of America N.A., Australia Branch, neither MLEA nor any of



R1 Ratings dispersions may vary from time to time where BofA Global Research believes it better reflects the investment prospects of stocks in a Coverage Cluster.

its affiliates involved in preparing this information is an Authorised Deposit-Taking Institution under the Banking Act 1959 nor regulated by the Australian Prudential Regulation Authority. No approval is required for publication or distribution of this information in Brazil and its local distribution is by Merrill Lynch (Brazil) in accordance with applicable regulations. Merrill Lynch (DIFC) is authorized and regulated by the DFSA. Information prepared and issued by Merrill Lynch (DIFC) is done so in accordance with the requirements of the DFSA conduct of business rules. BofA Europe (Frankfurt) distributes this information in Germany and is regulated by BaFin, the ECB and the CBI. BofA Securities entities, including BofA Europe and BofASE (France), may outsource/delegate the marketing and/or provision of certain research services or aspects of research services to other branches or members of the BofA Securities group. You may be contacted by a different BofA Securities entity acting for and on behalf of your service provider where permitted by applicable law. This does not change your service provider. Please refer to the Electronic Communications Disclaimers for further information.

This information has been prepared and issued by BofAS and/or one or more of its non-US affiliates. The author(s) of this information may not be licensed to carry on regulated activities in your jurisdiction and, if not licensed, do not hold themselves out as being able to do so. BofAS and/or MLPF&S is the distributor of this information in the US and accepts full responsibility for information distributed to BofAS and/or MLPF&S clients in the US by its non-US affiliates. Any US person receiving this information and wishing to effect any transaction in any security discussed herein should do so through BofAS and/or MLPF&S and not such foreign affiliates. Hong Kong recipients of this information should contact Merrill Lynch (Asia Pacific) Limited in respect of any matters relating to dealing in securities or provision of specific advice on securities or any other matters arising from, or in connection with, this information. Singapore recipients of this information should contact Merrill Lynch (Singapore) Pte Ltd in respect of any matters arising from, or in connection with, this information. For clients that are not accredited investors, expert investors or institutional investors Merrill Lynch (Singapore) Pte Ltd accepts full responsibility for the contents of this information distributed to such clients in Singapore.

#### General Investment Related Disclosures:

Taiwan Readers: Neither the information nor any opinion expressed herein constitutes an offer or a solicitation of an offer to transact in any securities or other financial instrument. No part of this report may be used or reproduced or quoted in any manner whatsoever in Taiwan by the press or any other person without the express written consent of BofA Securities. This document provides general information only, and has been prepared for, and is intended for general distribution to, BofA Securities clients. Neither the information nor any opinion expressed constitutes an offer or an invitation to make an offer, to buy or sell any securities or other financial instrument or any derivative related to such securities or instruments (e.g., options, futures, warrants, and contracts for differences). This document is not intended to provide personal investment advice and it does not take into account the specific investment objectives, financial situation and the particular needs of, and is not directed to, any specific person(s). This document and its content do not constitute, and should not be considered to constitute, investment advice for purposes of ERISA, the US tax code, the Investment Advisers Act or otherwise. Investors should seek financial advice regarding the appropriateness of investing in financial instruments and implementing investment strategies discussed or recommended in this document and should understand that statements regarding future prospects may not be realized. Any decision to purchase or subscribe for securities in any offering must be based solely on existing public information on such security or the information in the prospectus or other offering document issued in connection with such offering, and not on this document.

Securities and other financial instruments referred to herein, or recommended, offered or sold by BofA Securities, are not insured by the Federal Deposit Insurance Corporation and are not deposits or other obligations of any insured depository institution (including, Bank of America, N.A.). Investments in general and, derivatives, in particular, involve numerous risks, including, among others, market risk, counterparty default risk and liquidity risk. No security, financial instrument or derivative is suitable for all investors. Digital assets are extremely speculative, volatile and are largely unregulated. In some cases, securities and other financial instruments may be difficult to value or sell and reliable information about the value or risks related to the security or financial instrument may be difficult to obtain. Investors should note that income from such securities and other financial instruments, if any, may fluctuate and that price or value of such securities and instruments may rise or fall and, in some cases, investors may lose their entire principal investment. Past performance is not necessarily a guide to future performance. Levels and basis for taxation may change.

This report may contain a short-term trading idea or recommendation, which highlights a specific near-term catalyst or event impacting the issuer or the market that is anticipated to have a short-term price impact on the equity securities of the issuer. Short-term trading ideas and recommendations are different from and do not affect a stock's fundamental equity rating, which reflects both a longer term total return expectation and attractiveness for investment relative to other stocks within its Coverage Cluster. Short-term trading ideas and recommendations may be more or less positive than a stock's fundamental equity rating.

BofA Securities is aware that the implementation of the ideas expressed in this report may depend upon an investor's ability to "short" securities or other financial instruments and that such action may be limited by regulations prohibiting or restricting "shortselling" in many jurisdictions. Investors are urged to seek advice regarding the applicability of such regulations prior to executing any short idea contained in this report.

Foreign currency rates of exchange may adversely affect the value, price or income of any security or financial instrument mentioned herein. Investors in such securities and instruments, including ADRs, effectively assume currency risk.

BofAS or one of its affiliates is a regular issuer of traded financial instruments linked to securities that may have been recommended in this report. BofAS or one of its affiliates may, at any time, hold a trading position (long or short) in the securities and financial instruments discussed in this report.

BofA Securities, through business units other than BofA Global Research, may have issued and may in the future issue trading ideas or recommendations that are inconsistent with, and reach different conclusions from, the information presented herein. Such ideas or recommendations may reflect different time frames, assumptions, views and analytical methods of the persons who prepared them, and BofA Securities is under no obligation to ensure that such other trading ideas or recommendations are brought to the attention of any recipient of this information. In the event that the recipient received this information pursuant to a contract between the recipient and BofAS for the provision of research services for a separate fee, and in connection therewith BofAS may be deemed to be acting as an investment adviser, such status relates, if at all, solely to the person with whom BofAS has contracted directly and does not extend beyond the delivery of this report (unless otherwise agreed specifically in writing by BofAS). If such recipient uses the services of BofAS in connection with the sale or purchase of a security referred to herein, BofAS may act as principal for its own account or as agent for another person. BofAS is and continues to act solely as a broker-dealer in connection with the execution of any transactions, including transactions in any securities referred to herein.

#### Copyright and General Information:

Copyright 2024 Bank of America Corporation. All rights reserved. iQdatabase® is a registered service mark of Bank of America Corporation. This information is prepared for the use of BofA Securities clients and may not be redistributed, retransmitted or disclosed, in whole or in part, or in any form or manner, without the express written consent of BofA Securities. BofA Global Research information is distributed simultaneously to internal and client websites and other portals by BofA Securities and is not publicly-available material. Any unauthorized use or disclosure is prohibited. Receipt and review of this information constitutes your agreement not to redistribute, retransmit, or disclose to others the contents, opinions, conclusion, or information contained herein (including any investment recommendations, estimates or price targets) without first obtaining express permission from an authorized officer of BofA Securities. Materials prepared by BofA Global Research personnel are based on public information. Facts and views presented in this material have not been reviewed by, and may not reflect information known to, professionals in other business areas of BofA Securities, including investment banking personnel. BofA Securities has established information barriers between BofA Global Research and certain business groups. As a result, BofA Securities does not disclose certain client relationships with, or compensation received from, such issuers. To the extent this material discusses any legal proceeding or issues, it has not been prepared as nor is it intended to express any legal conclusion, opinion or advice. Investors should consult their own legal advisers as to issues of law relating to the subject matter of this material. BofA Global Research personnel's knowledge of legal proceedings in which any BofA Securities entity and/or its directors, officers and employees may be plaintiffs, defendants, co-defendants or co-plaintiffs with or involving issuers mentioned in this material is based on public inform

This information has been prepared independently of any issuer of securities mentioned herein and not in connection with any proposed offering of securities or as agent of any issuer of any securities. None of BofAS any of its affiliates or their research analysts has any authority whatsoever to make any representation or warranty on behalf of the issuer(s). BofA Global Research policy prohibits research personnel from disclosing a recommendation, investment rating, or investment thesis for review by an issuer prior to the publication of a research report containing such rating, recommendation or investment thesis.

Any information relating to the tax status of financial instruments discussed herein is not intended to provide tax advice or to be used by anyone to provide tax advice. Investors are urged to seek tax advice based on their particular circumstances from an independent tax professional.

The information herein (other than disclosure information relating to BofA Securities and its affiliates) was obtained from various sources and we do not guarantee its accuracy. This information may contain links to third-party websites. BofA Securities is not responsible for the content of any third-party website or any linked content contained in a third-party website. Content contained on such third-party websites is not part of this information and is not incorporated by reference. The inclusion of a link does not imply any endorsement by or any affiliation with BofA Securities. Access to any third-party website is at your own risk, and you should always review the terms and privacy policies at third-party websites before submitting any personal information to them. BofA Securities is not responsible for such terms and privacy policies and expressly disclaims any liability for them.



All opinions, projections and estimates constitute the judgment of the author as of the date of publication and are subject to change without notice. Prices also are subject to change without notice. BofA Securities is under no obligation to update this information and BofA Securities ability to publish information on the subject issuer(s) in the future is subject to applicable quiet periods. You should therefore assume that BofA Securities will not update any fact, circumstance or opinion contained herein.

Certain outstanding reports or investment opinions relating to securities, financial instruments and/or issuers may no longer be current. Always refer to the most recent research report relating to an issuer prior to making an investment decision.

In some cases, an issuer may be classified as Restricted or may be Under Review or Extended Review. In each case, investors should consider any investment opinion relating to such issuer (or its security and/or financial instruments) to be suspended or withdrawn and should not rely on the analyses and investment opinion(s) pertaining to such issuer (or its securities and/or financial instruments) nor should the analyses or opinion(s) be considered a solicitation of any kind. Sales persons and financial advisors affiliated with BofAS or any of its affiliates may not solicit purchases of securities or financial instruments that are Restricted or Under Review and may only solicit securities under Extended Review in accordance with firm policies.

Neither BofA Securities nor any officer or employee of BofA Securities accepts any liability whatsoever for any direct, indirect or consequential damages or losses arising from any use of this information.

