

Interest Rates Research

5 November 2019

#rethinkingmonpol

Euro Macro Themes

Negative rates: A non-linear dilemma for European banks

- The detrimental impact of negative rates on European banks has been a topic of widespread research, but the non-linearity of this exposure and the associated cost implications have not received as much attention.
- The ability of European banks to pass through policy rate cuts to retail deposits, and hence offset potentially lower returns on assets, falls materially when rates go below zero. This leads to negative rate convexity of bank lending margins, with the fall in margins accelerating as policy rates go into negative territory.
- Negative convexity, to current and future levels of rates, means that banks
 are implicitly short interest rate floor options on front-end rates. As a result,
 banks are negatively impacted not just by lower rate levels but also by higher
 rate volatility.
- This is significant for policymaking, as negative rates impose an additional cost on banks in the form of short positions on rate optionality. Policy makers should weigh this cost, among others, against the cumulative benefits of negative rates.
- Banks looking to mitigate the impact of low rates should consider being long rate volatility, alongside any long duration positions, to counter negative convexity.
- Similarly, equity investors that are overweight banks (see Banks For the braves, buy the Brexit dip, 23 October 2019 for the Barclays Equity Research view on European bank equities), but would like protection against losses if rates move lower, could buy interest rate floor options as a hedge.

Hitendra Rohra +44 (0) 20 7773 4817 hitendra.rohra@barclays.com Barclays, UK

www.barclays.com

This document is intended for institutional investors and is not subject to all of the independence and disclosure standards applicable to debt research reports prepared for retail investors under U.S. FINRA Rule 2242. Barclays trades the securities covered in this report for its own account and on a discretionary basis on behalf of certain clients. Such trading interests may be contrary to the recommendations offered in this report.

PLEASE SEE ANALYST CERTIFICATIONS AND IMPORTANT DISCLOSURES STARTING AFTER PAGE 6

Negative rates have a non-linear impact

The impact of negative rates on bank profitability in the euro area has been a widely discussed and well-researched topic over the past few years, since the ECB cut policy rates into negative territory in 2014. However, while there has been a lot of focus on quantifying the impact of rate cuts on banks at negative levels, the non-linearity of this exposure has not received as much attention.

The core issue associated with negative rates arises from the unequal passthrough of rate changes on the asset and liability side of bank balance sheets when rates are below zero

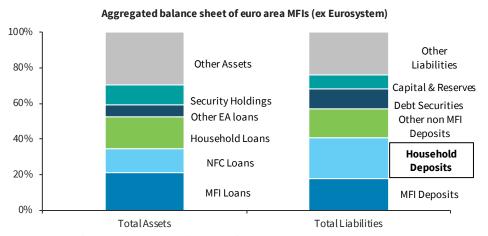
The core issue associated with negative rates arises from the unequal pass-through of rate changes on the asset and liability side of bank balance sheets when rates are below zero (see *European Bank Strategy: Negative rates and euro area banks: the problem and the solutions*, 3 October 2019). In large part this is because interest rates on customer deposits at banks, specifically retail deposits, tend to be floored at zero. Banks are therefore unable to adequately offset lower returns on assets with lower funding costs. As a result, not only does profitability fall as rates rally, but this relationship is also non-linear around zero.

To test this hypothesis, we analyse lending margins for banks in major euro area countries and find evidence of negative convexity to short rates – i.e. lending margins have tended to fall more and more sharply as policy rates have gone below zero. In line with this, we find that euro area bank equity indices have also exhibited negative convexity at low rates.

Bank profitability prospects are not only affected by current negative rate levels, but also by expectations of how long rates are likely to stay negative. Consequently, they are effectively short interest rate floor options, on front-end rates. In support of this, we find that the performance of euro area bank indices, relative to aggregate euro area equity indices, have been fairly correlated with premiums of interest rate floor options over the past few years.

This of significance for policy making not just in the euro area but also in other regions where policy rates are close to, but still above zero. Extended periods of negative rates impose an additional cost on banks, measured by the short rate optionality, which needs to be taken into account when assessing the implications of negative rates. For banks themselves, the analysis indicates that the embedded short optionality may require structural hedging, not just against the level of rates but also against the volatility in rates.

FIGURE 1
Household deposits constitute a sizeable portion of the liabilities of euro area MFIs



Note: Data as 31 July 2019. Source: ECB, Barclays Research

Floor on bank deposit rates leads to negative rate convexity

Household deposits constitute around 23% (or roughly €7.6tn) of the total liabilities of MFIs

Deposits form a sizeable portion of euro area MFI balance sheets

In Figure 1, we show an overview of the aggregated balance sheet of euro area MFIs (monetary financial institutions). Household deposits constitute a significant portion of the total liabilities of MFIs, with a share of around 23% (or roughly €7.6tn). Euro area banks have so far been unable to pass on negative policy rates to these household deposits. This is particularly true for overnight deposits, which constitute 55% of the total household deposits (or about €4.25tn) and have been floored at just above zero across major euro countries over the recent past (Figure 2). In fact, the problem of low pass through of negative rates may not just be restricted to household deposits. For instance, Figure 3 shows that the average rates on overnight NFC deposits have also stayed positive, in the euro area, with only German MFIs being able to charge negative rates to corporations so far.

Returns on the assets side, on the other hand, offer higher sensitivity to changes in rates, even at negative policy rate levels. For instance, loans to NFCs and households, which constitute about 30% of the assets held by euro area MFIs, have fairly positive yields (Figures 4 and 5). These, therefore, show sensitivity to rate moves, and have scope to fall if

FIGURE 2

Overnight household deposit rates have been floored

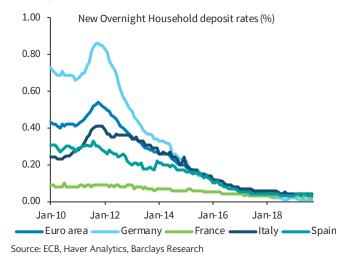
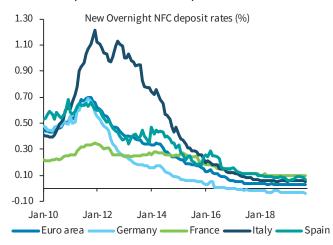


FIGURE 3

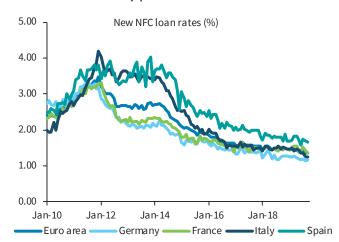
Even NFC deposit rates have been positive in most countries



Source: ECB, Haver Analytics, Barclays Research

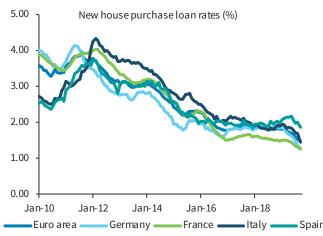
FIGURE 4

MFI loan rates are fairly positive and...



Source: ECB, Haver Analytics, Barclays Research

FIGURE 5 ...exhibit more sensitivity to rate cuts



Source: ECB, Haver Analytics, Barclays Research

With rates on a sizeable portion of deposits floored at zero, the offset to lower income from lower costs is not available to the same extent at

negative rate levels

Lending margins for MFIs have shown negative convexity, falling faster as short rates have turned negative

The offsetting effect of short rates on euro area bank stock indices is largely absent at negative rate levels policy rates fall further (for a detailed analysis regarding pass through of rates cuts in a negative rates environment see *European Bank Strategy: Negative rates and euro area banks: the problem and the solutions*, 3 October 2019).

Lending margins of euro area MFIs have negative convexity

In a positive rates environment, while a drop in interest rates tends to lower the future returns on loans (as well as other assets) for a bank, it also reduces the rate paid on the deposits (and other liabilities) held by the bank. Consequently, a drop in future earnings is in part offset by a fall in future costs. However, with interest rates on a sizeable portion of deposits being floored at zero, this offset to income from lower costs is not available to the same extent when policy rates turn negative. Therefore, the negative impact of a rates rally, on banks, increases when rates fall below zero. In other words, bank margins tend to suffer from negative convexity at low rate levels.

To verify this, we look at aggregate MFI lending margins on new loans for house purchases and to NFCs (non-financial corporations) in major euro area countries¹. We fit these margins using short rates (3m Euribor), long term rates (EUR 10y swap) and squared values of the short rates (Figure 6). Since banks typically lend for longer terms and borrow for shorter terms, the lending margin is likely to be dependent on the spread between long and short term rates. Figure 6 shows that this has been the case, at least in core euro area countries. More importantly for our analysis, however, lending margins in general have been inversely dependent on the squared value of short rates. In other words, lending margins for MFIs have shown negative convexity, falling faster as short rates have turned negative.

Negative convexity is also observed in financial institutions' pricing

Similarly, forward looking measures such as prices of bank stocks have also shown negative convexity at low rate levels. In Figure 7, we regress the ratio of Euro Stoxx Banks Index (SX7E) to Euro Stoxx 50 Index against long tenor rates (10y swap), short rates (3m Euribor) and a 0% floorlet on short rates. A 0% floorlet has a value of 0 when 3m Euribor rates are positive and value of -1 * 3m Euribor when the rate is negative.

As expected, the banks index (relative to the aggregate index) has tended to decrease when long term rates have rallied but increase when short term rates have rallied. However, the negative dependency on the floorlet indicates that this offsetting effect of short rates is absent at negative rate levels. In other words, the pricing of European banks has also been negatively and non-linearly affected as policy rates have turned negative.

FIGURE 6
Euro area bank lending margins have shown negative convexity

							Lendir	ng margin	S							-
	Germany		France				Italy				Spain					
		ns for Home urchase Loans to NFCs		Loans for Home Purchase		to NFCs Loans for Home Purchase		Loans to NFCs		Loans for Home Purchase		Loans to NFCs				
Variable	Coeff	T-stat	Coeff	T-stat	Coeff	T-stat	Coeff	T-stat	Coeff	T-stat	Coeff	T-stat	Coeff	T-stat	Coeff	T-stat
EUR 10y swap	0.63	25.9**	0.23	9.0**	0.48	9.1**	0.07	3.2**	0.24	5.5**	0.13	3.1**	-0.48	8.2**	-0.45	6.8**
3m Euribor	-0.34	7.8**	-0.07	1.5	-0.38	3.9**	-0.20	5.1**	0.02	0.3	0.26	3.5**	0.32	3.0**	0.24	2.0**
(3m Euribor)^2	-0.06	9.7**	-0.03	4.2**	-0.05	3.2**	0.03	4.5**	-0.03	2.1**	-0.06	5.2**	-0.01	0.7	-0.01	0.5
Constant	1.18	34.6	1.17	32.9**	1.12	14.8**	1.12	36.5**	1.09	17.3**	0.85	14.4**	2.21	26.7**	2.33	24.6**
R-squared	94%		65%		71%		23%		54%		59%		50%		49%	

Note: Regression from 2004 onwards, using monthly data. Source: ECB, Haver Analytics, Barclays Research

¹ Lending margins are measured by the ECB as the difference between MFIs' interest rates on new business loans and a weighted average interest rate on new deposits from households and non-financial corporations

Banks have implicit short interest rate volatility exposure

Outlook for banks are not only impacted by the current rate levels but also by expectations of how long rates are likely to be low or negative. Banks are therefore not just negatively exposed to the spot 0% floorlet (as described in the above section), but also to floorlets in the future. In effect, banks have a short exposure to interest rate floor options.

Banks are implicitly short interest rate floor options and therefore have short rate vol exposure In Figure 8 we plot the ratio of Euro Stoxx Banks Index (SX7E) to Euro Stoxx 50 index (SX5E) against the price of EUR 5y interest rate floors struck at 0%. As seen, this ratio has been highly correlated to the price of the floor with the R-squared of the fit being over 65%. This indicates that banks are indeed implicitly short interest rate floor options.

Interest rate floor options

Interest rate floors are a commonly traded interest rate options product. A typical interest rate floor in EUR consists of a series of floorlets (or options) on the 3m Euribor, with each floorlet expiring three months after the previous one. Each floorlet, in turn, is an option on the 3m Euribor that on expiry pays a linearly increasing payout if the rate is below the strike rate (K) and zero if the rate is above the strike. For instance, a EUR 5y floor with strike rate of 0% consists of 3m*3m, 6m*3m, ...54m*3m, 57m*3m receiver options (floorlets), each struck at 0%. Like other vanilla options, the price of an interest rate floor increases as implied, or expected, volatility of rates increases.

Short vol exposure imposes an additional cost and may require hedging

The price of an option is composed of two parts: expected payout if rates stay unchanged until expiry (known as *intrinsic value*) and the expected gain from any volatility in rates until expiry (*time value*). Therefore, a short optionality exposure means that the actual cost imposed on banks is in fact more than the loss that could eventually be incurred if rates remained negative, but unchanged, over time.

Policymakers, in our view, should take this cost – effectively arising from the future volatility in rates – into account when assessing the net benefits of negative policy rates. While the tiering system implemented by the ECB helps alleviate this cost, the current level of exempted reserves (at about €800bn) is only a tiny fraction of the total amount of household deposits at the Eurosystem level. Further measures, such as an increase in the multiplier or the

The present value of the cost for banks is more than the loss that could eventually be incurred if rates remained negative, but unchanged

This increase in cost, from short optionality, should also be considered when evaluating the net benefits of negative rates

FIGURE 7 Negative rates have had an adverse impact on euro area banks

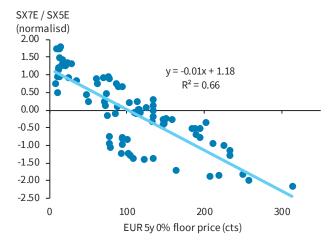
Regression of SX7E Banks Index / SX5E Euro-Stoxx Index (monthly frequency, since 2011, ratio has been normalised)

Variables	Coefficient	T-stat
EUR 10y swap (%)	0.95	7.5**
EUR 3m Euribor (%)	-0.45	2.2**
EUR 3m Floorlet (%)	-2.47	5.8**
Constant	-0.91	5.0**
R-squared	79.3%	

 ${\tt Note: Regression \ uses \ average \ monthly \ data. \ Source: Bloomberg, \ Barclays \ Research}$

FIGURE 8

Interest rate floor prices can help explain the variation in the outlook for banks



Note: Data is with monthly frequency. Source: Bloomberg, Barclays Research

The total short vega exposure of all euro area banks may be quite large

remuneration rate of exempt reserves, may therefore be needed. However, such changes likely have to be carefully calibrated to avoid any undue implications (see *Swiss tiering has not convinced the market*, 12 September 2019). In addition, a clear and effective communication that limits uncertainty on the evolution of policy rates, may also help by reducing undue volatility in rates.

For the banks themselves, the embedded short optionality means that they are not just exposed to future levels of rates but also to future volatility in short rates. Higher volatility increases the price of interest rate floors and is negative for banks. In rates options parlance, banks are short vega. By using the historical beta of the SX7E index to the 5y 0% strike interest rate floors, we roughly estimate that the short vega position may be in the range of €1-2bn/abpv vega for the banks in the index. For all the banks in the euro area, the exposure is even larger.

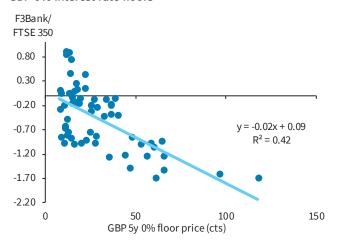
This is a sizeable amount of vega exposure, compared with the size of the entire rates options market. To provide context, the vega exposure of the outstanding USD callable notes – which is one of the biggest sources of options in rates – is likely around a few hundred million (USD). While the large short vega exposure may limit the amount that banks can hedge in the rates volatility market, rates options should nonetheless be an active tool to mitigate the impact of negative rates, in our view.

Negative convexity is not unique to the euro area

The non-linear impact of low rate levels is not unique to the euro area. For instance, UK financial institutions likely also have negative convexity to rates, even though policy rates are still positive there. Figure 9 shows that the ratio of the FTSE 350 Banks Index (F3BANK on Bloomberg) to the FTSE 350 Index has been negatively correlated to the price of GBP 5y 0% interest rate floors. Similarly, a regression of this ratio with long tenor rates, short rates and the price of 0% floors, shows that the relative performance of UK banks may have largely been a function of rate curve levels and rate optionality, since 2015.

Banks in the UK may also be feeling the effect of negative convexity due to low rate levels This suggests that even though rates in the UK are still positive, banks have already started feeling the effect of negative convexity due to low rate levels. Further rate cuts, especially into negative territory, would likely only increase this cost from short optionality and should be taken into account when evaluating the net impact of lower rates in the UK.

FIGURE 9
UK bank indices have been inversely impacted by the price of GBP 0% interest rate floors



Note: Data is of monthly frequency. Source: Bloomberg, Barclays Research

FIGURE 10

Rate levels along with the probability of negative rates have affected UK banks

Regression of F3Bank Index/ FTSE 350 Index (monthly
frequency, since 2015, ratio has been normalised)

Coefficient	T-stat
0.974	7.9**
-1.923	10.1**
-0.013	6.3**
-0.357	1.5
84.94%	
	0.974 -1.923 -0.013 -0.357

Source: Bloomberg, Barclays Research

Analyst Certification

I, Hitendra Rohra, hereby certify (1) that the views expressed in this research report accurately reflect my personal views about any or all of the subject securities or issuers referred to in this research report and (2) no part of my compensation was, is or will be directly or indirectly related to the specific recommendations or views expressed in this research report.

Important Disclosures:

Barclays Research is produced by the Investment Bank of Barclays Bank PLC and its affiliates (collectively and each individually, "Barclays").

All authors contributing to this research report are Research Analysts unless otherwise indicated. The publication date at the top of the report reflects the local time where the report was produced and may differ from the release date provided in GMT.

Availability of Disclosures:

For current important disclosures regarding any issuers which are the subject of this research report please refer to https://publicresearch.barclays.com or alternatively send a written request to: Barclays Research Compliance, 745 Seventh Avenue, 13th Floor, New York, NY 10019 or call +1-212-526-1072.

Barclays Capital Inc. and/or one of its affiliates does and seeks to do business with companies covered in its research reports. As a result, investors should be aware that Barclays may have a conflict of interest that could affect the objectivity of this report. Barclays Capital Inc. and/or one of its affiliates regularly trades, generally deals as principal and generally provides liquidity (as market maker or otherwise) in the debt securities that are the subject of this research report (and related derivatives thereof). Barclays trading desks may have either a long and / or short position in such securities, other financial instruments and / or derivatives, which may pose a conflict with the interests of investing customers. Where permitted and subject to appropriate information barrier restrictions, Barclays fixed income research analysts regularly interact with its trading desk personnel regarding current market conditions and prices. Barclays fixed income research analysts receive compensation based on various factors including, but not limited to, the quality of their work, the overall performance of the firm (including the profitability of the Investment Banking Department), the profitability and revenues of the Markets business and the potential interest of the firm's investing clients in research with respect to the asset class covered by the analyst. To the extent that any historical pricing information was obtained from Barclays trading desks, the firm makes no representation that it is accurate or complete. All levels, prices and spreads are historical and do not necessarily represent current market levels, prices or spreads, some or all of which may have changed since the publication of this document. Barclays Research Department produces various types of research including, but not limited to, fundamental analysis, equity-linked analysis, quantitative analysis, and trade ideas. Recommendations and trade ideas contained in one type of Barclays Research may differ from those contained in other types of Barclays Research, whether as a result of differing time horizons, methodologies, or otherwise. In order to access Barclays Statement regarding Research Dissemination Policies and Procedures, please refer to https://publicresearch.barcap.com/S/RD.htm. In order to access Barclays Research Conflict Management Policy Statement, please refer to: https://publicresearch.barcap.com/S/CM.htm.

All pricing information is indicative only. Prices are sourced from Refinitiv as of the last available closing price at the time of production of the research report, unless another time and source is indicated.

Types of investment recommendations produced by Barclays FICC Research:

In addition to any ratings assigned under Barclays' formal rating systems, this publication may contain investment recommendations in the form of trade ideas, thematic screens, scorecards or portfolio recommendations that have been produced by analysts in FICC Research. Any such investment recommendations produced by non-Credit Research teams shall remain open until they are subsequently amended, rebalanced or closed in a future research report. Any such investment recommendations produced by the Credit Research teams are valid at current market conditions and may not be otherwise relied upon.

Disclosure of other investment recommendations produced by Barclays FICC Research:

Barclays FICC Research may have published other investment recommendations in respect of the same securities/instruments recommended in this research report during the preceding 12 months. To view all investment recommendations published by Barclays FICC Research in the preceding 12 months please refer to https://live.barcap.com/go/research/Recommendations.

Legal entities involved in producing Barclays Research:

Barclays Bank PLC (Barclays, UK)

Barclays Capital Inc. (BCI, US)

Barclays Bank Ireland PLC, Frankfurt Branch (BBI, Frankfurt)

Barclays Bank Ireland PLC, Paris Branch (BBI, Paris)

Barclays Bank Ireland PLC, Milan Branch (BBI, Milan)

Barclays Securities Japan Limited (BSJL, Japan)

Barclays Bank PLC, Hong Kong branch (Barclays Bank, Hong Kong)

Barclays Capital Canada Inc. (BCCI, Canada)

Barclays Bank Mexico, S.A. (BBMX, Mexico)

Barclays Securities (India) Private Limited (BSIPL, India)

Barclays Bank PLC, India branch (Barclays Bank, India)

Barclays Bank PLC, Singapore branch (Barclays Bank, Singapore)

Barclays Bank PLC, DIFC Branch (Barclays Bank, DIFC)

Disclaimer:

This publication has been produced by Barclays Research Department in the Investment Bank of Barclays Bank PLC and/or one or more of its affiliates (collectively and each individually, "Barclays"). It has been prepared for institutional investors only and not for retail investors. It has been distributed by

one or more Barclays affiliated legal entities listed below. It is provided to our clients for information purposes only, and Barclays makes no express or implied warranties, and expressly disclaims all warranties of merchantability or fitness for a particular purpose or use with respect to any data included in this publication. To the extent that this publication states on the front page that it is intended for institutional investors and is not subject to all of the independence and disclosure standards applicable to debt research reports prepared for retail investors under U.S. FINRA Rule 2242, it is an "institutional debt research report" and distribution to retail investors is strictly prohibited. Barclays also distributes such institutional debt research reports to various issuers, media, regulatory and academic organisations for their own internal informational news gathering, regulatory or academic purposes and not for the purpose of making investment decisions regarding any debt securities. Media organisations are prohibited from re-publishing any opinion or recommendation concerning a debt issuer or debt security contained in any Barclays institutional debt research report. Any such recipients that do not want to continue receiving Barclays institutional debt research reports should contact debtresearch@barclays.com. Barclays will not treat unauthorized recipients of this report as its clients and accepts no liability for use by them of the contents which may not be suitable for their personal use. Prices shown are indicative and Barclays is not offering to buy or sell or soliciting offers to buy or sell any financial instrument.

Without limiting any of the foregoing and to the extent permitted by law, in no event shall Barclays, nor any affiliate, nor any of their respective officers, directors, partners, or employees have any liability for (a) any special, punitive, indirect, or consequential damages; or (b) any lost profits, lost revenue, loss of anticipated savings or loss of opportunity or other financial loss, even if notified of the possibility of such damages, arising from any use of this publication or its contents.

Other than disclosures relating to Barclays, the information contained in this publication has been obtained from sources that Barclays Research believes to be reliable, but Barclays does not represent or warrant that it is accurate or complete. Barclays is not responsible for, and makes no warranties whatsoever as to, the information or opinions contained in any written, electronic, audio or video presentations of third parties that are accessible via a direct hyperlink in this publication or via a hyperlink to a third-party web site ('Third-Party Content'). Any such Third-Party Content has not been adopted or endorsed by Barclays, does not represent the views or opinions of Barclays, and is not incorporated by reference into this publication. Third-Party Content is provided for information purposes only and Barclays has not independently verified its accuracy or completeness.

The views in this publication are solely and exclusively those of the authoring analyst(s) and are subject to change, and Barclays Research has no obligation to update its opinions or the information in this publication. Unless otherwise disclosed herein, the analysts who authored this report have not received any compensation from the subject companies in the past 12 months. If this publication contains recommendations, they are general recommendations that were prepared independently of any other interests, including those of Barclays and/or its affiliates, and/or the subject companies. This publication does not contain personal investment recommendations or investment advice or take into account the individual financial circumstances or investment objectives of the clients who receive it. The securities and other investments discussed herein may not be suitable for all investors. Barclays is not a fiduciary to any recipient of this publication. Investors must independently evaluate the merits and risks of the investments discussed herein, consult any independent advisors they believe necessary, and exercise independent judgment with regard to any investment decision. The value of and income from any investment may fluctuate from day to day as a result of changes in relevant economic markets (including changes in market liquidity). The information herein is not intended to predict actual results, which may differ substantially from those reflected. Past performance is not necessarily indicative of future results. The information provided does not constitute a financial benchmark and should not be used as a submission or contribution of input data for the purposes of determining a financial benchmark.

United Kingdom: This document is being distributed (1) only by or with the approval of an authorised person (Barclays Bank PLC) or (2) to, and is directed at (a) persons in the United Kingdom having professional experience in matters relating to investments and who fall within the definition of "investment professionals" in Article 19(5) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005 (the "Order"); or (b) high net worth companies, unincorporated associations and partnerships and trustees of high value trusts as described in Article 49(2) of the Order; or (c) other persons to whom it may otherwise lawfully be communicated (all such persons being "Relevant Persons"). Any investment or investment activity to which this communication relates is only available to and will only be engaged in with Relevant Persons. Any other persons who receive this communication should not rely on or act upon it. Barclays Bank PLC is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority and is a member of the London Stock Exchange.

European Economic Area ("EEA"): This material is being distributed in the EEA by Barclays Bank PLC. Barclays Bank PLC is not registered in France with the Autorité des marchés financiers or the Autorité de contrôle prudentiel.

Americas: The Investment Bank of Barclays Bank PLC undertakes U.S. securities business in the name of its wholly owned subsidiary Barclays Capital Inc., a FINRA and SIPC member. Barclays Capital Inc., a U.S. registered broker/dealer, is distributing this material in the United States and, in connection therewith accepts responsibility for its contents. Any U.S. person wishing to effect a transaction in any security discussed herein should do so only by contacting a representative of Barclays Capital Inc. in the U.S. at 745 Seventh Avenue, New York, New York 10019.

Non-U.S. persons should contact and execute transactions through a Barclays Bank PLC branch or affiliate in their home jurisdiction unless local regulations permit otherwise.

This material is distributed in Canada by Barclays Capital Canada Inc., a registered investment dealer, a Dealer Member of IIROC (www.iiroc.ca), and a Member of the Canadian Investor Protection Fund (CIPF).

This material is distributed in Mexico by Barclays Bank Mexico, S.A.

Japan: This material is being distributed to institutional investors in Japan by Barclays Securities Japan Limited. Barclays Securities Japan Limited is a joint-stock company incorporated in Japan with registered office of 6-10-1 Roppongi, Minato-ku, Tokyo 106-6131, Japan. It is a subsidiary of Barclays Bank PLC and a registered financial instruments firm regulated by the Financial Services Agency of Japan. Registered Number: Kanto Zaimukyokucho (kinsho) No. 143.

Asia Pacific (excluding Japan): Barclays Bank PLC, Hong Kong Branch is distributing this material in Hong Kong as an authorised institution regulated by the Hong Kong Monetary Authority. Registered Office: 41/F, Cheung Kong Center, 2 Queen's Road Central, Hong Kong.

All Indian securities-related research and other equity research produced by Barclays' Investment Bank are distributed in India by Barclays Securities (India) Private Limited (BSIPL). BSIPL is a company incorporated under the Companies Act, 1956 having CIN U67120MH2006PTC161063. BSIPL is registered and regulated by the Securities and Exchange Board of India (SEBI) as a Research Analyst: INH000001519; Portfolio Manager INP000002585; Stock Broker/Trading and Clearing Member: National Stock Exchange of India Limited (NSE) Capital Market INB231292732, NSE Futures & Options INF231292732, NSE Currency derivatives INE231450334, Bombay Stock Exchange Limited (BSE) Capital Market INB011292738, BSE Futures & Options INF011292738; Depository Participant (DP) with the National Securities & Depositories Limited (NSDL): DP ID: IN-DP-NSDL-299-2008; Investment Adviser: INA000000391. The registered office of BSIPL is at 208, Ceejay House, Shivsagar Estate, Dr. A. Besant Road, Worli, Mumbai – 400 018, India. Telephone No: +91 2267196000. Fax number: +91 22 67196100. Any other reports produced by Barclays' Investment Bank are distributed in India by

Barclays Bank PLC, India Branch, an associate of BSIPL in India that is registered with Reserve Bank of India (RBI) as a Banking Company under the provisions of The Banking Regulation Act, 1949 (Regn No BOM43) and registered with SEBI as Merchant Banker (Regn No INM000002129) and also as Banker to the Issue (Regn No INBI00000950). Barclays Investments and Loans (India) Limited, registered with RBI as Non Banking Financial Company (Regn No RBI CoR-07-00258), and Barclays Wealth Trustees (India) Private Limited, registered with Registrar of Companies (CIN U93000MH2008PTC188438), are associates of BSIPL in India that are not authorised to distribute any reports produced by Barclays' Investment Bank.

This material is distributed in Singapore by the Singapore branch of Barclays Bank PLC, a bank licensed in Singapore by the Monetary Authority of Singapore. For matters in connection with this material, recipients in Singapore may contact the Singapore branch of Barclays Bank PLC, whose registered address is 10 Marina Boulevard, #23-01 Marina Bay Financial Centre Tower 2, Singapore 018983.

This material is distributed to persons in Australia by Barclays Bank PLC. None of Barclays Bank PLC, nor any other Barclays group entity, holds an Australian financial services licence and instead relies on an exemption from the requirement to hold such a licence. This material is intended to only be distributed to "wholesale clients" as defined by the Australian Corporations Act 2001.

Middle East: Nothing herein should be considered investment advice as defined in the Israeli Regulation of Investment Advisory, Investment Marketing and Portfolio Management Law, 1995 ("Advisory Law"). This document is being made to eligible clients (as defined under the Advisory Law) only. Barclays Israeli branch previously held an investment marketing license with the Israel Securities Authority but it cancelled such license on 30/11/2014 as it solely provides its services to eligible clients pursuant to available exemptions under the Advisory Law, therefore a license with the Israel Securities Authority is not required. Accordingly, Barclays does not maintain an insurance coverage pursuant to the Advisory Law.

This material is distributed in the United Arab Emirates (including the Dubai International Financial Centre) and Qatar by Barclays Bank PLC. Barclays Bank PLC in the Dubai International Financial Centre (Registered No. 0060) is regulated by the Dubai Financial Services Authority (DFSA). Principal place of business in the Dubai International Financial Centre: The Gate Village, Building 4, Level 4, PO Box 506504, Dubai, United Arab Emirates. Barclays Bank PLC-DIFC Branch, may only undertake the financial services activities that fall within the scope of its existing DFSA licence. Related financial products or services are only available to Professional Clients, as defined by the Dubai Financial Services Authority. Barclays Bank PLC in the UAE is regulated by the Central Bank of the UAE and is licensed to conduct business activities as a branch of a commercial bank incorporated outside the UAE in Dubai (Licence No.: 13/1844/2008, Registered Office: Building No. 6, Burj Dubai Business Hub, Sheikh Zayed Road, Dubai City) and Abu Dhabi (Licence No. 13/952/2008, Registered Office: Al Jazira Towers, Hamdan Street, PO Box 2734, Abu Dhabi). Barclays Bank PLC in the Qatar Financial Centre (Registered No. 00018) is authorised by the Qatar Financial Centre Regulatory Authority (QFCRA). Barclays Bank PLC-QFC Branch may only undertake the regulated activities that fall within the scope of its existing QFCRA licence. Principal place of business in Qatar: Qatar Financial Centre, Office 1002, 10th Floor, QFC Tower, Diplomatic Area, West Bay, PO Box 15891, Doha, Qatar. Related financial products or services are only available to Business Customers as defined by the Qatar Financial Centre Regulatory Authority.

Russia: This material is not intended for investors who are not Qualified Investors according to the laws of the Russian Federation as it might contain information about or description of the features of financial instruments not admitted for public offering and/or circulation in the Russian Federation and thus not eligible for non-Qualified Investors. If you are not a Qualified Investor according to the laws of the Russian Federation, please dispose of any copy of this material in your possession.

IRS Circular 230 Prepared Materials Disclaimer: Barclays does not provide tax advice and nothing contained herein should be construed to be tax advice. Please be advised that any discussion of U.S. tax matters contained herein (including any attachments) (i) is not intended or written to be used, and cannot be used, by you for the purpose of avoiding U.S. tax-related penalties; and (ii) was written to support the promotion or marketing of the transactions or other matters addressed herein. Accordingly, you should seek advice based on your particular circumstances from an independent tax advisor.

© Copyright Barclays Bank PLC (2019). All rights reserved. No part of this publication may be reproduced or redistributed in any manner without the prior written permission of Barclays. Barclays Bank PLC is registered in England No. 1026167. Registered office 1 Churchill Place, London, E14 5HP. Additional information regarding this publication will be furnished upon request.

BRCF2242