

The POINT Conditional Recovery Rate (CRR) Model

We updated our Conditional Recovery Rate (CRR) model in Barclays Capital's POINT platform. The CRR model is used to calculate loss given default in the Global Risk Model (GRM) for corporate debt instruments. The recovery rate estimates are forward-looking and time-varying in relation to the state of the economy. The model performs much better than historical averages in predicting future recovery rates and accounts for well established empirical regularities; recoveries vary with the economic cycle and subordination level, and depend on the overall health of the industry in which the firm operates. The updates include use of the aggregate default rate forecasts and distance-to-default measures from the POINT CDP model.

1. Introduction

The recent turmoil in credit markets has once again brought into focus the concerns of portfolio managers, risk managers, and other market participants surrounding issuer default risk (i.e., the risk to portfolio values and asset returns caused by uncertainty regarding a firm's ability to fulfill its obligations with respect to its debt and obligations).

In order to reliably measure default risk at the security level, we need accurate estimates of the default probability of the issuing firm and a measure of loss given default of the security. In addition, measurement of default risk at the portfolio level requires default correlations. Our earlier publication of the POINT CDP¹ model discusses how we estimate forward-looking default probabilities. Here we discuss our approach to estimating the loss given default (LGD).

Our Conditional Recovery Rate (CRR) model is a dynamic statistical model that predicts recovery rates on corporate debt instruments using different categories of predictive information. It contains conditioning variables related to the seniority of the instrument, industry, and economic environment. Our default probability and recovery rate models were developed coherently such that they have common on the state of the economy. Both models are used in the Barclays Capital's Global Risk Model to capture the risk of default-related portfolio loss.

The CRR model is calibrated to a one-month prediction horizon on a large sample of post-default prices of US bonds. The empirical performance of the model constitutes a significant improvement over more commonly used approaches to recovery rate estimation.

Attakrit Asvanunt +1 212 526 4558 attakrit.asvanunt@barcap.com

Arne Staal +44 (0)20 3134 7602 arne.staal@barcap.com

www.barcap.com

We would like to thank Anthony Lazanas, Alistair Mcleod, Simon Polbennikov, Bradley Rogoff and Antonio Silva for their valuable comments and suggestions.

¹ See Asvanunt and Staal (2009).

2. Recovery Rates

Recovery rates are an important variable in credit-related modeling and financial decision making, and as such, have been the topic of a substantial literature in both industry and academia. Accurate modeling of recovery rates is especially important in the context of risk management, where sensible measurement of portfolio loss distributions is crucial.

The importance of modeling recovery rates is clear from the expression for the expected loss on a defaultable obligation:

Expected loss = exposure at default x default probability x LGD

The expected loss is symmetrical in default probabilities and LGD, and therefore the same proportional error in either of these variables will have the same effect on the projected loss of the security. While the expected loss is symmetrical in default probabilities and recovery rates, the distributions of recovery rates and default probabilities are very different. Observed and predicted recovery rates are much more widely dispersed than estimated default probabilities, which suggests that an increase in the accuracy of predicted recovery rates has a relatively large impact on the uncertainty surrounding the expected loss estimate.

Common practice is to extract estimates of recovery rates from historical averages within categories of obligations (e.g., senior unsecured corporate bonds). The static and backward-looking nature of this approach can lead to significant biases in estimates of expected credit losses, especially around the turning points in the business cycle. We address the shortcomings of the standard approach by conditioning estimates of future recovery rates on forward-looking indicators.

What drives debt recovery? We investigate several categories of information with respect to their relationship with realized recovery rates based on existing literature and our own analysis of a large sample of defaulted bond data. The most important determinant of the recovery on a defaulted claim is whether or not it is secured, i.e., backed by some sort of collateral, and where it falls in the capital structure of the obligor, i.e., the degree to which the claim is subordinated to other securities of the firm. Another important finding is that recoveries are systematically related to the state of the economy; losses are systematically higher in recessions than expansions. In addition, the health of the industry in which the firm operates captures common tendencies of recovery rates on firm obligations². We measure this last variable through the average distance-to-default for a particular industry as given by the POINT CDP model³. Additional information on future recovery rates might come from firm-level information. We found little evidence of improved out-of-sample predictability using this type of information⁴. We briefly discuss each of the components of the conditioning information set that drives the CRR model.

A recurring theme in the literature on default recoveries is that seniority and the presence of collateral are perhaps the most important determinants of recovery rates. To illustrate, in their study on corporate bank loans, Gupton, Gates and Carty (2000) report that syndicated loan recoveries for senior secured debt average 70%, while those for senior unsecured debt

² This categorization is in line with recent academic research. Acharya et al (2007) conclude that contract-specific characteristics such as seniority and security, industry of defaulting firm, and macroeconomic condition are likely to play an important role in explaining variation in recoveries.

³ Asvanunt and Staal (2009) discuss the POINT CDP model and the distance-to-default variable in detail.

⁴ The fit of a model estimated with firm-specific conditioning variables such as leverage was only marginally better in sample; out-of-sample this slight improvement was found to be irrelevant.

average only 52%. For our purposes, we take into account collateral by distinguishing secured from unsecured obligations. Seniority is then combined with collateral to provide a standard classification of corporate obligations.

Figure 1: Recovery rates by subordination of defaulted US corporate bonds (1973 – 2008)

Lien Position	Historical Average
Senior Super Secured⁵	61.4%
Senior Secured	58.6%
Senior Unsecured	38.6%
Senior Subordinated	34.1%
Subordinated	33.2%
Junior Subordinated	16.4%
Preferred Stock	9.0%

Source: Barclays Capital, Moody's

Figure 1 clearly illustrates the impact of lien position on recovery rates: all else being equal, lower seniority leads to a lower recovery rate, while the presence of collateral tends to increase the recovery rate.

As is well understood by now, a large component of credit risk is systematic⁶. In recessions, or more generally bad economic times, the number of firms defaulting on their obligations rises. At the same time, the amount recovered on those defaulted obligations tends to decrease⁷. This joint behavior of default and recovery rates amounts to a compounding of credit risk that is often ignored in models of portfolio credit risk⁸. The credit risk models in Barclays Capital's Global Risk Model incorporate this compounding of credit risk through the negative correlation of recovery rates and default probabilities over the business cycle through joint dependence of recovery rates and firm default probabilities on indicators of the state of the economy. In effect, we assume that the same underlying economic conditions that cause default rates to rise also cause recovery rates to decline⁹.

Figure 2 shows the density of recovery rates in a large sample of observed prices on corporate bonds 30 days after the default event. The unconditional sample distribution of recoveries is far from symmetrical, with low recoveries being significantly more common. It is interesting to note the substantial difference in recovery distributions over time. It has been noted before that recoveries are lower (and default rates higher) in bad economic times, and the aggregation of the recovery distribution in good and bad times results in the different sample distribution. We illustrate this by plotting the density of recovery rates in NBER dated recessionary and expansionary periods separately in Figure 3.

While the average recovery rate over our whole sample is 39.9%, it is only 28.9% during recessions versus 42.5% during expansions. Clearly, we see proportionally many more cases of lower recoveries in recessions. During expansionary periods, recoveries are more evenly distributed.

August 10, 2009 3

-

⁵ Senior Super Secured debts are Equipment Trust Certificates and Enhanced Equipment Trust Certificates.

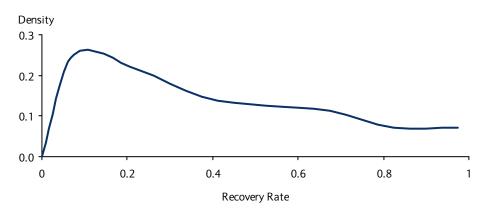
⁶ A common observation is that only up to half of corporate credit spreads can be explained by expected loss. A significant part of the remainder of spreads could be explained by default risk premia required by investors for bearing systematic default related loss risk.

See Altman et al. (2005) for a more detailed discussion.

⁸ Frye (2000) describes one of the first econometric models in which recovery and default likelihood depend on the same systematic factor.

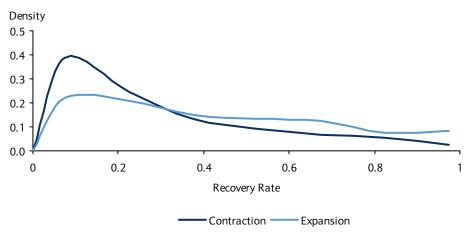
⁹ Of course, it is possible that to some extent the higher default rate itself drives the lower recovery rates through diminished recovery value in a saturated market for specific assets.

Figure 2: Density of historical recovery rates on US corporate debt (1973-2008)



Source: Barclays Capital, Moody's

Figure 3: Density of historical recovery rates during NBER contractions and expansions on US corporate debt (1973-2008)



Source: Barclays Capital, Moody's

Further inspection of the data confirms that recovery rates vary significantly over time, both within a subordination class and over the whole sample. Average recovery rates over time are strongly correlated with the business cycle, in particular with the realized aggregate default rate. Figure 4 compares the high-yield default rates and the average recovery rates of senior unsecured bonds each year.

Default Rate Recovery Rate 0.12 0.8 0.7 0.10 0.6 0.08 0.5 0.06 0.4 0.3 0.04 0.2 0.02 0.1 1983 1985 1987 1989 1991 1993 1995 1997 1999 2001 2003 2005 2007 Year - HY Default Rate -Sr. Unsecured Recovery

Figure 4: US high-yield default rates versus average recovery rates over senior unsecured bonds (1983-2008)

Source: Barclays Capital, Moody's

Finally, there are differences in recovery rates between industries related to factors such as asset specificity and concentration (Acharya et al (2007) stress the importance of industry effects on recovery rates). We use the 10 economic sectors defined in the GICS I classification to incorporate industry-specific effects into the CRR model¹⁰. In the CRR model, the importance of industry membership in explaining recovery is dependent on the overall level of distress in the industry.

3. Modeling Recovery

Before we discuss the details of our modeling approach, we explain how recovery is defined and measured for our purposes. The price at default is defined as the 30-day post-default observed price¹¹. The recovery rate is then defined as the fraction of face value recovered by the price observed 30 days after the default event:

$$RR_t = \frac{P_t^{default}}{100}$$

Recovery rates should be expected to lie in the interval $[0,1]^{12}$. Loss given default (LGD) is then simply defined as $(1-RR)^{13}$. To incorporate recovery rates into a model of return distributions, we can translate RR into return space as follows:

$$R_{default,t} = \frac{RR_t}{P_{t-1}} \times 100 - 1 .$$

The sectors in this classification are: energy, materials, industrials, consumer discretionary, consumer staples, health care, financials, information technology, telecommunications, and utilities.

A default event is defined by the occurrence of the following credit events: Chapter 7 or Chapter 11 bankruptcy, a missed payment or delayed disbursement of interest or principal, and some occurrences of distressed exchange. See Emery et al. (2009) for more detail on definition of default.

¹² A very small number of observed recovery rates are larger than one. This might reflect the value of coupons or restructuring events. We ignore these values for modeling purposes.

¹³ The Global Risk Model in POINT reports LGD as $\left(1 - \frac{RR_t}{P_t}\right) + \frac{YTW}{12}$

This definition focuses on the loss of principal and payments foregone, and ignores the workout expenses of the default process¹⁴. For our purposes it is the most relevant definition of recovery, since it reflects the goal of the majority of investors and portfolio managers to avoid, or sell, positions in newly defaulted debt. Accurate modeling of recovery rates is an important tool in the decision-making process of such investors.

In order to model the conditional distributions of recovery rates over time, we employ a statistical framework that links the conditioning information set to recovery rates. The CRR model is based on a dynamic Beta regression¹⁵ approach for modeling recovery rates RR:

$$RR_t \sim Beta(\alpha_t, \gamma_t),$$

Where we express expected recovery rates through a monotonic transformation of a linear expression:

$$E[RR_t | x_{t-1}] = g(x_{t-1}'\beta),$$

And we use the link function:

$$g(z) = \frac{\exp(z)}{1 + \exp(z)}.$$

The beta distribution provides us with a flexible modeling tool that respects the natural domain of recovery rates. The choice of the link function g together with the choice of the predictive variables x, allows for a dynamic model of expected recovery rates. We transform raw predictive variables to increase their explanatory power in the model (that is, the variables x are themselves subject to some "pre-modeling"). The logit function above was found to perform best in terms of forecasting performance. The model is estimated using maximum likelihood techniques, and all the standard machinery associated with standard statistical theory applies. The approach described here allows us to model the entire conditional distribution of recovery rates, including the variance of the beta distribution. This is useful since it allows us to incorporate this parameter as a random variable in simulations of portfolio distributions, and portfolio credit loss in particular.

4. Empirical Results

Our model is based on a sample that consists of almost 2,500 unique observations on post default bond prices and data on over 800 separate corporate default events over the period from 1984 to 2008. The final estimation sample is constructed to reflect par-debt value weighted recovery rates for each seniority class for each firm. That is, we create a value weighted recovery observation for each subordination class for each firm, and use these as the primary modeling object. While our model is fitted to bond data, loans are treated in the same framework as well; the predicted recovery rates on loans used in our risk models are calibrated in the framework of the CRR model in a second modeling step based on loan-specific data¹⁶.

¹⁴ Alternatively, we can interpret the recovery upon default as the value of the suitably discounted expected ultimate recovery (i.e., the recovery realized at the resolution of the default). An entirely different approach to estimating recovery rates is to imply recovery rates from liquid credit instrument prices. This approach is not suitable for portfolio risk modeling since it effectively produces risk-neutral quantities through assumptions on risk premia and pricing models.

¹⁵ See' http://en.wikipedia.org/wiki/Beta_distribution' for a detailed description of the Beta distribution.

¹⁶ Loans are typically senior to bonds, and typically have higher recovery rates since (they are far more likely to be collateralized).

Most of the content of the model lies in the choice of the information set, or predictive variables x. Ideally, we would have liked to link recovery rates to firm-specific circumstances such as leverage and asset specificity, as well as industry- and economy-wide indicators. Unfortunately, results from a model with individual firm variables were not convincing in terms of statistical fit and economic intuition. While disappointing, these results are not surprising given the relatively small sample size that results when individual firm data are required leading up to the default event with a prediction horizon of one month¹⁷.

The final model specification is relatively simple but accounts for well established empirical findings. The predictive variable used to account for the state of the economy is our forward-looking high-yield aggregate default rate forecast developed for the POINT CDP model, which in turn is driven by macro-variables such as the tightening of commercial and industrial loan standards¹⁸ and the percentage of corporate bonds rated high yield. The industry effects are captured through the average level of distance-to-default from the POINT CDP model and indicator variables for the GICS I industry classifications. Debt subordination is also captured through indicator variables for the seven levels of classification.

Estimated coefficients of the variables in the CRR model are significant at the 5% level, except for three of the industry indicators (which we include nonetheless since they do improve the fit of the model in a sensible way). The effect of subordination, industry, and the state of the economy is as expected. For example, as of the end of 2008, average predicted recovery rates are significantly higher for utilities (48.2% for senior unsecured debt), and lower for financial, information technology, and telecommunication firms (26.6%, 25.0%, and 27.5% for senior unsecured debt, respectively). Recovery rates are negatively correlated with the default probabilities from our POINT CDP model through their opposite dependence on the aggregate default rate forecasts and average distance-todefault. This agrees with empirical evidence that default and recovery rates are significantly negatively correlated over the economic cycle. Figure 5 shows the predicted recovery rates for selected industries. The inclusion of industry average distance-to-default allows us to capture the time-variant impact of the state of individual industries. Intuitively, a lower distance-to-default within an industry predicts lower recoveries due to an increased risk of industry-wide distress. For instance, historical recovery rates for information technology and telecommunication firms were more significantly affected during the dot-com bust in 2000 than for other industries. Using industry average distance-to-default as a predictor allowed us to anticipate this phenomenon in the CRR model.

August 10, 2009 7

17

Using predictive variables with a longer historical lag did not improve the statistical fit significantly. A compromise using aggregate firm variables at the industry level performed better in terms of significance of coefficients, but did not lead to significant improvement in statistical fit, and most importantly, out-of-sample forecasting performance.
 Tightening of C&I loan standard is obtained from the Federal Reserves' senior loan officer opinion survey.

Recovery Rate 0.9 0.8 0.7 0.6 0.5 0.4 0.3 0.2 0.1 0.0 2000 2001 2002 2003 2004 2005 2006 2007 2008 Industrials = —IT Telecom -Utilities

Figure 5: Predicted recovery rates for senior unsecured bond by industry (2000-2008)

Source: Barclays Capital

The CRR model performs markedly better than the historical average approach in predicting recovery rates. We performed out-of-sample tests between 1997 and 2008 to compare the results. The mean squared prediction error (MSPE¹⁹) of the backward-looking historical average model (which we implement by taking the 12-month trailing average of recovery by subordination category) over our sample is 774. The CRR model improves substantially upon this with an MSPE of 625. The (pseudo) R2 in a beta regression is 0.16 for a model based on the 12-month trailing recovery rate and subordination, versus 0.28 for the CRR model. The correlation between our predicted and realized recovery rate at issuer level is 53% across all subordination levels. The correlation between average predicted and realized recovery rate on senior unsecured debt is 85%.

It is interesting to note that the difference between the CRR model estimates and those from historical averages is particularly significant around the turning points of economic cycles. For example, as of the end of 2007, the 12-month trailing average of recovery rates for senior unsecured bonds was 69.6%, while the CRR model estimate was 60.3%. After years of historically low default rates and high recovery rates, the backward-looking approach predicts relatively high recovery rates. The CRR model takes into account the current state of the economy, and the level of distress in individual industries, and adjusts predicted recovery rates downwards accordingly: recovery rate predictions by subordination are below trailing averages because the economic indicators are reflecting a worse-than-average state of the economy. In contrast, the historical average approach predicts high recoveries based on the favorable (and few) observed recoveries in the past 12 months.

5. Conclusions

Barclays Capital's Conditional Recovery Rate (CRR) model is a proprietary statistical model that is used to predict recovery rates on corporate debt instruments. The recovery rate estimates provided by the model are one of the essential determinants of portfolio credit risk in Barclays Capital's Global Risk Model in POINT. The model provides forward-looking recovery rate estimates of corporate debt instruments based on predictive information in three different categories: subordination, industry, and the state of the economy.

August 10, 2009 8

 $[\]sum \left(RR_t^{predicted} - RR_t^{actual}\right)^2$ which measures the average distance between predicted recoveries and MSPE = realized recoveries

References

Acharya, V., S. Bharath, and A. Srinivasan (2007), "Does Industry-wide Distress affect Defaulted Firms? Evidence from Credit Recoveries", Journal of Financial Economics, 85(3), 787-821, September 2007.

Altman, E., B. Brady, A. Resti, and A. Sironi (2005), "The Link between Default and Recovery Rates: Theory, Empirical Evidence, and Implications", Journal of Business, 78(6), 2203-2227, November 2005.

Asvanunt, A. and A. Staal (2009), "The Corporate Default Probability model in the Barclays Capital POINT platform (POINT CDP)", Portfolio Modeling, Barclays Capital, April 2009.

Chava, S., C. Stefanescu, and S. Turnbull (2008), "Modeling the Loss Distribution", working paper, April 2008.

Emery, K., S. Ou, J. Tennant, A. Matos, and R. Cantor (2009), "Corporate Default and Recovery Rates, 1920-2008", Moody's Investors Service, Global Credit Policy, February 2009.

Ferrari S. and F. Cribari-Neto (2004), "Beta Regression for Modeling Rates and Proportions", Journal of Applied Statistics, 31(7), 799-815, August 2004.

Frye, J. (2000), "Collateral Damage", Risk, 13(4), 91-94, April 2000.

Gupton, G., D. Gates, and L. Carty (2000), "Bank Loan Loss Given Default", Moody's Investors Service, Global Credit Research, November 2000.

Joneja, D., L. Dynkin et al. (2005), "The Lehman Brothers Global Risk Model: A Portfolio Manager's Guide", April 2005.

Appendix

This appendix provides details about the Beta regression model used in our recovery rate model²⁰. The model uses a parameterization of the Beta distribution that is indexed by mean and dispersion parameters. The advantage of using Beta distributions to model conditional distributions of recovery rates is that they are very versatile in capturing differently shaped distributions while respecting the natural domain of recovery rate outcomes [0,1]. We model time-varying recovery rate distributions by linking the mean and variance of these distributions to economically relevant determinants of recovery rates.

We assume recovery rates 0 < RR < 1 follow a Beta distribution with time-varying parameters:

$$RR_t \sim Beta(\alpha_t, \gamma_t)$$
, $\alpha_t, \gamma_t > 0$

Notice that the time-varying nature of our model can capture empirical features (such as multi-modality) of unconditional recovery distributions through aggregation of conditional Beta distributions. We re-parameterize the beta distribution to be expressed in terms of a mean and dispersion parameter:

$$RR_t \sim Beta(\mu_t, \sigma_t)$$

where

$$\mu_t = E_{t-1}[RR_t] = \frac{\alpha_t}{\alpha_t + \gamma_t}$$

and

$$\sigma_t = V_{t-1} \left(R R_t \right) = \frac{\mu_t \left(1 - \mu_t \right)}{1 + \varphi_t}.$$

 $\varphi_{\rm t}$ can be interpreted as a dispersion parameter because the variance of recovery rates RR_t is decreasing in $\varphi_{\rm t}$ for a fixed value of μ_t ,

The model is specified by assuming that the conditional mean of RR_t can be written as:

$$\mu_t = g(X_{t-1}\beta)$$

Where beta is a vector of regression parameters and X_{t-1} is a matrix of covariates observed in the current information set at each point in time, and the link function g is specified by

$$g(z) = \frac{\exp(z)}{1 + \exp(z)}.$$

Additionally, we can specify the dispersion parameter in a similar fashion as

$$\varphi_t = h(Z_t \delta),$$

for some suitable differentiable monotonic link function h and a set of (possibly different) regression parameters Z_t . For our purposes, we set $\varphi_t=\varphi$, since our analysis does not support a more complex specification.

²⁰ See Ferrai and Cribari-Neto (2004) for a full exposition of the statistical theory on which we build here.

The log-likelihood function for a sample of conditionally independent observations is:

$$l(\beta, \delta) = \sum_{t=1}^{N} (\log \Gamma(\varphi_t) - \log \Gamma(\mu_t \varphi_t) - \log \Gamma((1 - \mu_t)\varphi_t) + (\mu_t \varphi_t - 1)\log RR_t + ((1 - \mu_t)\varphi_t - 1)\log(1 - RR_t)),$$

where μ_t and φ_t are specified as above, and Γ denotes the gamma function. Since the corresponding estimating equations do not admit a closed-form solution, the maximum likelihood estimates of all parameters are found through numerical optimization of the log-likelihood. Using standard statistical theory, the asymptotic distribution of these estimators can be derived and used in creating test statistics. A bootstrap approach was employed to further investigate the properties of the model.

Analyst Certification(s)

To the extent that any of the views expressed in this research report are based on the firm's quantitative research model, Barclays Capital Inc. hereby certifies that the views expressed in this research report accurately reflect the firm's quantitative research model and that no part of its analysts compensation was, is or will be directly or indirectly related to the specific recommendations or views expressed herein.

We, Attakrit Asvanunt and Arne D. Staal, hereby certify (1) that the views expressed in this research report accurately reflect our personal views about any or all of the subject securities or issuers referred to in this research report and (2) no part of our compensation was, is or will be directly or indirectly related to the specific recommendations or views expressed in this research report.

Important Disclosures

On September 20, 2008, Barclays Capital Inc. acquired Lehman Brothers' North American investment banking, capital markets, and private investment management businesses. Historical and current disclosure information is provided via the two sources listed below.

https://ecommerce.barcap.com/research/cgi-bin/all/disclosuresSearch.pl or call 1-212-526-1072; http://www.lehman.com/USFIdisclosures/

Clients can access Barclays Capital research produced after the acquisition date either through Barclays Capital's research website or through LehmanLive. Barclays Capital does and seeks to do business with companies covered in its research reports. As a result, investors should be aware that Barclays Capital may have a conflict of interest that could affect the objectivity of this report. Any reference to Barclays Capital includes its affiliates. Barclays Capital and/or an affiliate thereof (the "firm") 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). The firm's proprietary trading accounts may have either a long and / or short position in such securities and / or derivative instruments, which may pose a conflict with the interests of investing customers. Where permitted and subject to appropriate information barrier restrictions, the firm's fixed income research analysts regularly interact with its trading desk personnel to determine current prices of fixed income securities. The firm's fixed income research analyst(s) 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 Fixed Income Division and the outstanding principal amount and trading value of, the profitability of, and the potential interest of the firms 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 Capital trading desks, the firm makes no representation that it is accurate or complete. All levels, prices and spreads are historical and do not represent current market levels, prices or spreads, some or all of which may have changed since the publication of this document. Barclays Capital produces a variety of different types of fixed income research, including fundamental credit analysis, quantitative credit analysis and trade ideas. Recommendations contained in one type of research may differ from recommendations contained in other types, whether as a result of differing time horizons, methodologies, or otherwise.



This publication has been prepared by Barclays Capital, the investment banking division of Barclays Bank PLC, and/or one or more of its affiliates as provided below. This publication is provided to you for information purposes only. Prices shown in this publication are indicative and Barclays Capital is not offering to buy or sell or soliciting offers to buy or sell any financial instrument. Other than disclosures relating to Barclays Capital, the information contained in this publication has been obtained from sources that Barclays Capital believes to be reliable, but Barclays Capital does not represent or warrant that it is accurate or complete. The views in this publication are those of Barclays Capital and are subject to change, and Barclays Capital has no obligation to update its opinions or the information in this publication. Barclays Capital and its affiliates and their respective officers, directors, partners and employees, including persons involved in the preparation or issuance of this document, may from time to time act as manager, co-manager or underwriter of a public offering or otherwise, in the capacity of principal or agent, deal in, hold or act as market-makers or advisors, brokers or commercial and/or investment bankers in relation to the securities or related derivatives which are the subject of this publication.

The analyst recommendations in this report reflect solely and exclusively those of the author(s), and such opinions were prepared independently of any other interests, including those of Barclays Capital and/or its affiliates.

Neither Barclays Capital, nor any affiliate, nor any of their respective officers, directors, partners, or employees accepts any liability whatsoever for any direct or consequential loss arising from any use of this publication or its contents. The securities discussed in this publication may not be suitable for all investors. Barclays Capital recommends that investors independently evaluate each issuer, security or instrument discussed in this publication and consult any independent advisors they believe necessary. 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 in this publication is not intended to predict actual results, which may differ substantially from those reflected. Past performance is not necessarily indicative of future results.

This communication is being made available in the UK and Europe to persons who are investment professionals as that term is defined in Article 19 of the Financial Services and Markets Act 2000 (Financial Promotion Order) 2005. It is directed at, and therefore should only be relied upon by, persons who have professional experience in matters relating to investments. The investments to which it relates are available only to such persons and will be entered into only with such persons. Barclays Capital is authorized and regulated by the Financial Services Authority ('FSA') and member of the London Stock Exchange.

Barclays Capital Inc., US registered broker/dealer and member of FINRA (www.finra.org), 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.

Subject to the conditions of this publication as set out above, ABSA CAPITAL, the Investment Banking Division of ABSA Bank Limited, an authorised financial services provider (Registration No.: 1986/004794/06), is distributing this material in South Africa. Any South African person or entity wishing to effect a transaction in any security discussed herein should do so only by contacting a representative of ABSA Capital in South Africa, 15 ALICE LANE, SANDTON, JOHANNESBURG, GAUTENG, 2196. ABSA CAPITAL IS AN AFFILIATE OF BARCLAYS CAPITAL.

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.

In Japan, this report is being distributed by Barclays Capital Japan Limited to institutional investors only. Barclays Capital Japan Limited is a joint-stock company incorporated in Japan with registered office of 2-2-2, Otemachi, Chiyoda-ku, Tokyo 100-0004, 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. Barclays Bank PLC Frankfurt Branch is distributing this material in Germany under the supervision of Bundesanstalt fuer Finanzdienstleistungsaufsicht (BaFin).

IRS Circular 230 Prepared Materials Disclaimer: Barclays Capital and its affiliates do 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 (2009). All rights reserved. No part of this publication may be reproduced in any manner without the prior written permission of Barclays Capital or any of its affiliates. 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.

US12725