

20 Jan 2019 18:33:54 ET | 11 pages

High Grade
North America

US High Grade Strategy Flash

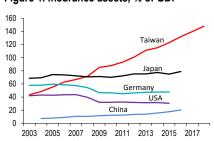
Dawn of the Formosa ETF

- Same engine, new chassis. The Asian foreign bond buying machine is revving up to start the year with strength, in <u>line</u> with our <u>expectations</u>, re-energizing investor interest in corporate paper, particularly in the long end, at a time of rising anxiety about weakened credit metrics among high-grade issuers. Inflows have been driven by Taipei-listed passive funds that purchase U.S. dollar developed-market corporate bonds, a novel bond-buying vehicle <u>we first discussed</u> in August. Watch for spillover of this demand base across spread product and USD government bond markets. The last time Taiwan life insurers drove the development of a new market category, it grew over four years into the \$125 billion Formosa bond behemoth.
- Buy local, invest global. Taiwan-listed ETFs buying foreign corporate bonds are growing in excess of 30% per *month* with aggregate inflows of \$6 billion in their first year, and could generate \$40 billion in cumulative inflows before the end of 2020, if we extrapolate linearly from the current rate of growth. The lightning-fast growth of these funds let's call them Formosa ETFs has already led to reports in local media that insurance regulators have verbally warned insurers to monitor the embedded FX risk of these funds, which are listed as Taiwan dollar products. Beyond driving corporate bond demand, an additional \$4 billion of Formosa ETFs have made their way into US Treasuries and USD emerging market bonds, although the growth rate of non-corporate funds is currently far lower.
- A credible trend. Taiwan's life insurers hold \$500 billion in foreign fixed income out of \$750 billion in total invested capital, but their primary engine of asset growth the Formosa bond market has seen its growth rate slow substantially under new regulatory restrictions introduced in November. Moreover, the funds are regulated as domestic investments, despite holding exclusively foreign currency debt, leaving them exempt, for now, from foreign bond caps. Media reports indicate that the government has stopped short of drawing a red line on the size of the ETF market, allowing growth to continue for now, up to a maximum potential size of roughly \$80 bn.
- Under the hood. We review the segments of the market targeted by Formosa ETFs, showing current holdings by industry and rating, and consider the potential scope for growth and other challenges on the horizon.

Daniel Sorid AC +1-212-723-1992 daniel.sorid@citi.com

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

Figure 1. Insurance assets, % of GDP



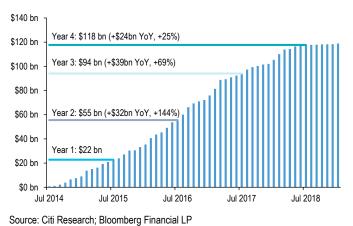
Source: Citi Research; World Bank; Taiwan Financial Supervisory Commission

Dawn of the Formosa ETF

The U.S. corporate bond market is witnessing the development of a new investment vehicle situated 8,000 miles away that could grow to well above \$40 billion in assets, and potentially as large as \$80 billion. Roughly three dozen exchange-traded funds listed in Taiwan have drawn in the local currency equivalent of \$10 billion in inflows over the past 12 months, acquiring an exclusively USD-denominated base of assets centered around US IG corporate bonds with average yields of 4.75% and maturities 15 years and beyond. The pace of inflows is accelerating, mirroring the rapid development of the Formosa bond market in 2014, which life insurers in Taiwan grew over the course of four years into a \$120 billion behemoth (Figure 2). These new flows, which we call *Formosa ETFs*, are growing exponentially, particularly in the segment dedicated to developed-market USD IG paper (Figure 3). Cumulative flows into the Formosa ETFs that buy corporate bonds doubled between May and September, doubled again by December, and are up 35% YTD.

This rapid growth has led regulators to issue verbal warnings to lifers about embedded foreign exchange risks, according to one local media report. For now we have not seen rulemaking that could forestall this market's rapid development. The flows are undeniably positive for risk sentiment in the near term, coinciding with a decline is FX hedging costs that could drive renewed interest in the asset class from private investors in Japan and Korea. That said, the passive and rule-based investment strategies of these vehicle means that bonds downgraded below single-A thresholds will by necessity be sold from some of these vehicles, including four of the larger ETFs that are floored at single-A rated paper or better. Beyond near-term technical pressures on downgrades, we view the nexus of currency risk and credit risk within the foreign bond portfolios of investors in Taipei, Tokyo and Seoul as an area of systemic fragility. The maturity mismatch between (short) hedging vehicles and (long) bond investments remains a source of substantial concern for US corporate bond market stability and exposes US credit markets to the risk of outflows triggered by exogenous shocks to Asian financial institutions.

Figure 2. Value of Taiwan-listed USD corporate bonds ('Old Formosa')



2

Note: >20yr USD corporate bonds ex-Taiwan issuer

Figure 3. Inflows into Taiwan-listed foreign bond ETFs ('New Formosa')



Source: Citi Research; Bloomberg Financial LP

A new format for Asian investment in US credit

Later in this note, we discuss the details of these funds and their investment holdings. But we begin by considering why a new foreign bond market is developing in Taiwan – rather than in, say, a much larger financial center such as Tokyo or London. It may seem almost random, but it's no coincidence. Taipei has earned a reputation as one of the world's great innovators for foreign bond investment. Its life

insurance companies, the largest in the world as a share of GDP (Figure 1), have \$800 billion in invested capital, enough to buy every one of its local currency bonds in existence – three times over¹. Lifers have by necessity turned abroad, amassing \$500 billion in foreign fixed income securities². Our analysis suggests lifers' foreign investments are held predominantly in U.S. dollars, and are split roughly evenly between bonds issued by U.S. and European banks, bonds issued by companies and governments from emerging market countries, and bonds issued by non-financial companies and agencies in developed economies. Regulatory filings suggest that Taiwan lifers at one point owned roughly one-third of the 30-year debt of the major U.S. telecommunications companies.

To understand the growth of the Formosa ETFs, it helps to review the history of the regulatory environment for local lifers. Technically, Taiwan lifers can't hold more than 45% of their assets in foreign bonds. But over the years, regulators have relaxed those constraints, such that today, a lifer could qualify for an additional 40 percentage points of additional foreign bond buying capacity through partial or total exemptions on certain categories of foreign currency bonds.

These exemptions have been the catalyst for the development of new bond investing vehicles. When life insurance companies came close to hitting their foreign investment limits around 2014, regulators modified the rules to permit foreign companies to issue so-called "international" bonds exempt from the foreign bond limit – as long as they were listed on a local exchange. That market, known as the Formosa market, ballooned into \$120 billion within four years³, so large that last year regulators moved to cap its size, imposing restrictions on its future growth. That marketplace now hosts \$120 billion of 20-year and longer maturity bonds issued by banks and other companies from the United States, the United Kingdom, France, and around the world.

In another instance, to qualify for another 19 percentage points of headroom on foreign securities, insurers can underwrite life insurance policies in U.S. dollars, passing the risk of a sharp appreciation of the TWD onto households (and alleviating their own burden of hedging costs that eat up most of the yield of their USD investments). Early evidence⁴ suggests that life insurance companies are eagerly taking up the mantle of foreign currency policies.

Foreign bond ETFs are only the latest new investment vehicle to emerge from the Taiwan bond innovation incubator. Formosa ETFs, which target subsets of major corporate bond indexes, offer potentially greater liquidity and diversification than Formosa bonds, and are regulated as domestic fund securities (as they are, after all, local currency funds, despite the embedded FX risk). Formosa ETFs, despite being a fraction of the size, already hold nearly 800 different USD corporate bonds, double the number of bonds issued into the Formosa bond market.

An underdeveloped local bond market leaves few other options for the insurers than to look abroad to match the duration needs of their liabilities, and life insurance outflows have grown to 10% of GDP (Figure 4), in line with periods of peak accumulation of central foreign reserves. By accumulating \$500 billion in foreign bonds, Taiwan lifer and their policyholders bear substantial long-term credit risk

3

¹ Bloomberg data show approximately \$190 bn of TWD-denominated government debt and \$95 bn of TWD-denominated corporate debt outstanding.

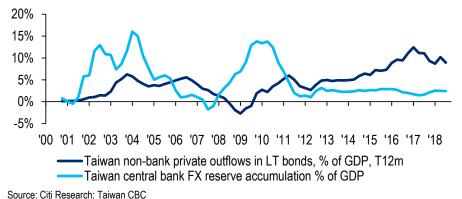
 $^{^2}$ We estimate that of this amount, DM USD corporate bonds represent about \$110 billion of DM USD Formosa bonds and \$170 bn of DM USD non-Formosa bonds.

³ We count 20-year and longer USD bonds listed in Taipei, excluding local issuers

⁴ "Taiwan lifers' USD plans for 2019," D. Sorid, https://www.citivelocity.com/t/r/eppublic/1Y8uN

from portfolios focused heavily on bank, telecommunication and commodity-related issuers. They also share the risk of any unhedged currency exposure (should the U.S. dollar depreciate). Life insurers have aimed to manage the inherent currency mismatch of this strategy through a combination of selling FX forwards (at a substantial upfront cost), under-hedging, or more recently through aggressive marketing of life insurance products that pay out to policyholders in USD. The TWD "wrapping" of USD paper held by Formosa ETFs adds a new dimension to the approach to managing FX risk. FX reserve provisions⁵ and modifications to FX reserve valuation regulations suggest this space is one to watch, as the complexities of intertwined FX and credit risk remain a source of significant vulnerability for an IG market 40% owned by non-US investors.

Figure 4. Insurers' accumulation of foreign bonds rivals peaks in central bank reserve growth



The dynamic of the Formosa ETF isn't merely focused on US corporates. Flows have also materialized into foreign bond ETFs focused on US Treasuries, Chinese bonds and \$ EM paper, although those categories have stalled out for now (**Figure 3**). Conceptually, the foreign bond ETF phenomenon could develop for any asset class that can meet the basic duration and yield requirements of Taiwan's life insurance companies. At some stage, local regulators could stamp out the market by imposing caps. For now, these not-quite-local-equities and not-quite-foreign-bonds could conceivably grow to \$80 billion, or 10% of assets, if regulators permit them to, based on rules governing domestic fund investments.

Key characteristics of Taiwan foreign corporate bonds ETFs

There are currently 14 distinct corporate bond ETFs listed in Taipei, with total assets of \$7 bn. Another 22 funds exist that hold US Treasuries, \$EM and Chinese debt, with assets of roughly \$5.39 bn, although these categories are not currently growing at anywhere near the pace of the 14 US corporate focused funds. The funds are held as TWD instruments, meaning that investors would need to purchase currency hedge overlays to protect against a depreciation of the USD. The rolling cost of a 3m currency hedge sits at 270 bps, or roughly 55% of the gross yield of the average bond yield held by ETFs.

Fund growth can be measured in net asset value or by cumulative fund flows, which ignore the effect of asset appreciation. Through the fund flow lens, US corporate-focused ETFs have drawn in \$6.1 billion in funds through January 17, 2019. These ETF flows are currently far smaller cousins to the two pillars of Taiwan lifer investments – traditional bond holdings, and Formosa bond holdings.

⁵ See, "Taiwan Financials: Life Losses Drive Double-Digit Consensus EPS Cuts," by Yafei Tai, https://www.citivelocity.com/t/r/eppublic/1Y8sC

The funds are listed on the Taipei exchange, and passively track segments of broad and widely followed US corporate bond indexes, carved out by rating, maturity, sector and/or minimum coupon rate. As of early January, the funds hold 716 distinct ISINs across 200 unique tickers, although 40% of the funds' assets are held in the 10 largest tickers. The average market value held per ISIN is \$8.8 million (716 bonds across \$6.3 bn in market value), compared to average per-ISIN holdings of \$300 mm in the Formosa bond market.

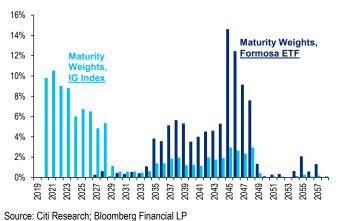
Figure 5. Sector and rating distribution of USD corporate-focused Formosa ETFs

Sector	Weight (%)
Technology	29.7
Bank	22.3
Communications	10.3
Energy	8.4
Pharmaceuticals	8.2
Consumer Cyclical	3.6
Healthcare	2.9

Rating Weig	ght (%)
AAA	10.7
AA+	6.3
AA	1.5
AA-	5.1
A+	13.8
A	9.5
A-	17.9
BBB+	16.4
BBB	12.0
BBB-	5.8
BB+	0.7
Source: Citi Research; Bloomberg Financial LP	

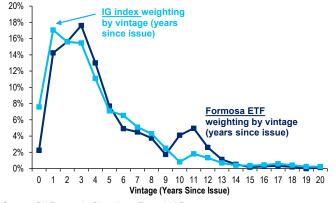
Roughly 60% of the combined portfolio is held in the technology, bank and communications sectors, with another 30% held in bonds from the energy, pharma, consumer, healthcare, media and retail sectors. Sectors are likely to continue to diversify based on the availability of yields; YTM >4.5% appears to be the focus of these portfolios (Figure 6). The composite bond portfolio of these ETFs carries a duration of 14.2 years, with bonds maturing in greater than 15 years representing 95% of the portfolio (and bonds maturing in 25 years or greater representing 55% of the portfolio.) The average yield of the portfolio 4.75%. More than 80% of the debt carries a rating of BBB+ or higher, and A+ rated bonds account for 13.8% of the holdings. The skew toward higher ratings is consistent with the findings of our earlier portfolio study of Taiwan exposures as of December 2017 (US High Grade Strategy Focus: Taiwan's foreign bond hot-pot), which indicated substantial market underweight in bonds rated mid-BBB or below. The design of these ETFs, which typically reference baskets of bonds with 15 or 20 years remaining to maturity, creates a significant overweight to older-vintage bonds, such as 20-year bonds issued 10 years ago. Demand for off-the-run 20-year bonds would could continue to grow if the ETF market grows. In addition, Taiwan ETFs skew significantly toward larger issue sizes (Figure 8).

Figure 6. Maturity distribution of Formosa ETFs vs broad IG market



5

Figure 7. Vintage (years from issue) of Formosa ETF DM IG holdings



Source: Citi Research; Bloomberg Financial LP

Figure 8. Weighting by bond issue size, Formosa ETFs vs IG index

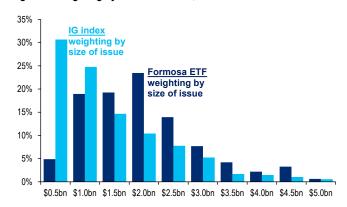


Figure 9. Estimated holdings of Taiwan lifer foreign bond portfolio

	Formosa	Non-Formosa	Total	Pct
US Bank	25.9	35.7	61.6	12%
Yankee Bank	52.6	60.4	113.0	23%
TMT	20.4	33.1	53.5	11%
Other DM Corp	12.0	38.2	50.1	10%
Asset Manager		30.8	30.8	6%
DM SSA		42.7	42.7	9%
EM	16.4	126.6	143.0	29%
Total Foreign Bond	127 2	367.5	494.7	_

Source: Citi Research; Bloomberg Financial LP

Source: Citi Research; Company filings; Taiwan FSC

Appendix A-1

Analyst Certification

The research analysts primarily responsible for the preparation and content of this research report are either (i) designated by "AC" in the author block or (ii) listed in bold alongside content which is attributable to that analyst. If multiple AC analysts are designated in the author block, each analyst is certifying with respect to the entire research report other than (a) content attributable to another AC certifying analyst listed in bold alongside the content and (b) views expressed solely with respect to a specific issuer which are attributable to another AC certifying analyst identified in the price charts or rating history tables for that issuer shown below. Each of these analysts certify, with respect to the sections of the report for which they are responsible: (1) that the views expressed therein accurately reflect their personal views about each issuer and security referenced and were prepared in an independent manner, including with respect to Citigroup Global Markets Inc. and its affiliates; and (2) no part of the research analyst's compensation was, is, or will be, directly or indirectly, related to the specific recommendations or views expressed by that research analyst in this report.

IMPORTANT DISCLOSURES

Disclosure for investors in the Republic of Turkey: Under Capital Markets Law of Turkey (Law No: 6362), the investment information, comments and recommendations stated here, are not within the scope of investment advisory activity. Investment advisory service is provided in accordance with a contract of engagement on investment advisory concluded between brokerage houses, portfolio management companies, non-deposit banks and clients. Comments and recommendations stated here rely on the individual opinions of the ones providing these comments and recommendations. These opinions may not fit to your financial status, risk and return preferences. For this reason, to make an investment decision by relying solely to this information stated here may not bring about outcomes that fit your expectations. Furthermore, Citi Research is a division of Citigroup Global Markets Inc. (the "Firm"), which does and seeks to do business with companies and/or trades on securities covered in this 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, however investors should also note that the Firm has in place organisational and administrative arrangements to manage potential conflicts of interest of this nature.

Analysts' compensation is determined by Citi Research management and Citigroup's senior management and is based upon activities and services intended to benefit the investor clients of Citigroup Global Markets Inc. and its affiliates (the "Firm"). Compensation is not linked to specific transactions or recommendations. Like all Firm employees, analysts receive compensation that is impacted by overall Firm profitability which includes investment banking, sales and trading, and principal trading revenues. One factor in equity research analyst compensation is arranging corporate access events between institutional clients and the management teams of covered companies. Typically, company management is more likely to participate when the analyst has a positive view of the company.

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

Unless stated otherwise neither the Research Analyst nor any member of their team has viewed the material operations of the Companies for which an investment view has been provided within the past 12 months.

For important disclosures (including copies of historical disclosures) regarding the companies that are the subject of this Citi Research product ("the Product"), please contact Citi Research, 388 Greenwich Street, 30th Floor, New York, NY, 10013, Attention: Legal/Compliance [E6WYB6412478]. In addition, the same important disclosures, with the exception of the Valuation and Risk assessments and historical disclosures, are contained on the Firm's disclosure website at https://www.citivelocity.com/cvr/eppublic/citi_research_disclosures. Valuation and Risk assessments can be found in the text of the most recent research note/report regarding the subject company. Pursuant to the Market Abuse Regulation a history of all Citi Research recommendations published during the preceding 12-month period can be accessed via Citi Velocity (https://www.citivelocity.com/cv2) or your standard distribution portal. Historical disclosures (for up to the past three years) will be provided upon request.

NON-US RESEARCH ANALYST DISCLOSURES

Non-US research analysts who have prepared this report (i.e., all research analysts listed below other than those identified as employed by Citigroup Global Markets Inc.) are not registered/qualified as research analysts with FINRA. Such research analysts may not be associated persons of the member organization and therefore may not be subject to the FINRA Rule 2241 restrictions on communications with a subject company, public appearances and trading securities held by a research analyst account. The legal entities employing the authors of this report are listed below:

Citigroup Global Markets Inc Daniel Sorid

OTHER DISCLOSURES

Any price(s) of instruments mentioned in recommendations are as of the prior day's market close on the primary market for the instrument, unless otherwise stated

The completion and first dissemination of any recommendations made within this research report are as of the Eastern date-time displayed at the top of the Product. If the Product references views of other analysts then please refer to the price chart or rating history table for the date/time of completion and first dissemination with respect to that view.

European regulations require that where a recommendation differs from any of the author's previous recommendations concerning the same financial instrument or issuer that has been published during the preceding 12-month period that the change(s) and the date of that previous recommendation are indicated. Please refer to the trade history in the published research or contact the research analyst.

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

The proportion of all Citi Research research recommendations that were the equivalent to "Buy", "Hold", "Sell" at the end of each quarter over the prior 12 months (with the % of these that had received investment firm services from Citi in the prior 12 months shown in brackets) is as follows: Q4 2018 Buy 33% (69%), Hold 43% (62%), Sell 23% (59%), RV 0.6% (100%); Q3 2018 Buy 33% (69%), Hold 43% (64%), Sell 23% (58%), RV 0.6% (99%); Q2 2018 Buy 33% (70%), Hold 43% (64%), Sell 23% (57%), RV 0.6% (89%); Q1 2018 Buy 32% (71%), Hold 44% (63%), Sell 24% (56%), RV 0.4% (98%). For the purposes of disclosing recommendations other than for equity or high yield recommendations (whose definitions can be found in their corresponding disclosure sections), "Buy" means a positive directional trade idea; "Sell" means a negative directional trade idea; and "Relative Value" means any trade idea which does not have a clear direction to the investment strategy.

European regulations require a 5 year price history when past performance of a security is referenced. CitiVelocity's Charting Tool (https://www.citivelocity.com/cv2/#go/CHARTING_3_Equities) provides the facility to create customisable price charts including a five year option. This tool can be found in the Data & Analytics section under any of the asset class menus in CitiVelocity (https://www.citivelocity.com/). For further information contact CitiVelocity support (https://www.citivelocity.com/cv2/go/CLIENT_SUPPORT). The source for all referenced prices, unless otherwise stated, is DataCentral, which sources price information from Thomson Reuters. Past performance is not a guarantee or reliable indicator of future results. Forecasts are not a guarantee or reliable indicator of future performance.

Investors should always consider the investment objectives, risks, and charges and expenses of an ETF carefully before investing. The applicable prospectus and key investor information document (as applicable) for an ETF should contain this and other information about such ETF. It is important to read carefully any such prospectus before investing. Clients may obtain prospectuses and key investor information documents for ETFs from the applicable distributor or authorized participant, the exchange upon which an ETF is listed and/or from the applicable website of the applicable ETF issuer. The value of the investments and any accruing income may fall or rise. Any past performance, prediction or forecast is not indicative of future or likely performance. Any information on ETFs contained herein is provided strictly for illustrative purposes and should not be deemed an offer to sell or a solicitation of an offer to purchase units of any ETF either explicitly or implicitly. The opinions expressed are those of the authors and do not necessarily reflect the views of ETF issuers, any of their agents or their affiliates.

Citigroup Global Markets India Private Limited and/or its affiliates may have, from time to time, actual or beneficial ownership of 1% or more in the debt securities of the subject issuer.

Citi Research generally disseminates its research to the Firm's global institutional and retail clients via both proprietary (e.g., Citi Velocity and Citi Personal Wealth Management) and non-proprietary electronic distribution platforms. Certain research may be disseminated only via the Firm's proprietary distribution platforms; however such research will not contain changes to earnings forecasts, target price, investment or risk rating or investment thesis or be otherwise inconsistent with the author's previously published research. Certain research is made available only to institutional investors to satisfy regulatory requirements. Individual Citi Research analysts may also opt to circulate published research to one or more clients by email; such email distribution is discretionary and is done only after the research has been disseminated. The level and types of services provided by Citi Research analysts to clients may vary depending on various factors such as the client's individual preferences as to the frequency and manner of receiving communications from analysts, the client's risk profile and investment focus and perspective (e.g. market-wide, sector specific, long term, short-term etc.), the size and scope of the overall client relationship with the Firm and legal and regulatory constraints.

Pursuant to Comissão de Valores Mobiliários Rule 598 and ASIC Regulatory Guide 264, Citi is required to disclose whether a Citi related company or business has a commercial relationship with the subject company. Considering that Citi operates multiple businesses in more than 100 countries around the world, it is likely that Citi has a commercial relationship with the subject company.

Securities recommended, offered, or sold by the Firm: (i) are not insured by the Federal Deposit Insurance Corporation; (ii) are not deposits or other obligations of any insured depository institution (including Citibank); and (iii) are subject to investment risks, including the possible loss of the principal amount invested. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security. Any decision to purchase securities mentioned in the Product must take into account existing public information on such security or any registered prospectus. Although information has been obtained from and is based upon sources that the Firm believes to be reliable, we do not guarantee its accuracy and it may be incomplete and condensed. Note, however, that the Firm has taken all reasonable steps to determine the accuracy and completeness of the disclosures made in the Important Disclosures section of the Product. The Firm's research department has received assistance from the subject company(ies) referred to in this Product including, but not limited to, discussions with management of the subject company(ies) or visiting company sites. Firm policy prohibits research analysts from sending draft research to subject companies. However, it should be presumed that the author of the Product has had discussions with the subject company to ensure factual accuracy prior to publication. All opinions, projections and estimates constitute the judgment of the author as of the date of the Product and these, plus any other information contained in the Product, are subject to change without notice. Prices and availability of financial instruments also are subject to change without notice. Notwithstanding other departments within the Firm advising the companies discussed in this Product, information obtained in such role is not used in the preparation of the Product. Although Citi Research does not set a predetermined frequency for publication, if the Product is a fundamental equity or credit research report, it is the intention of Citi Research to provide research coverage of the covered issuers, including in response to news affecting the issuer. For non-fundamental research reports, Citi Research may not provide regular updates to the views, recommendations and facts included in the reports. Notwithstanding that Citi Research maintains coverage on, makes recommendations concerning or discusses issuers, Citi Research may be periodically restricted from referencing certain issuers due to legal or policy reasons. Where a component of a published trade idea is subject to a restriction, the trade idea will be removed from any list of open trade ideas included in the Product. Upon the lifting of the restriction, the trade idea will either be re-instated in the open trade ideas list if the analyst continues to support it or it will be officially closed. Citi Research may provide different research products and services to different classes of customers (for example, based upon long-term or short-term investment horizons) that may lead to differing conclusions or recommendations that could impact the price of a security contrary to the recommendations in the alternative research product, provided that each is consistent with the rating system for each respective product.

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

Important Disclosures for Bell Potter Customers: Bell Potter is making this Product available to its clients pursuant to an agreement with Citigroup Global Markets Australia Pty Limited. Neither Citigroup Global Markets Australia Pty Limited nor any of its affiliates has made any determination as to the suitability of the information provided herein and clients should consult with their Bell Potter financial advisor before making any investment decision.

The Citigroup legal entity that takes responsibility for the production of the Product is the legal entity which the first named author is employed by. The Product is made available in Australia through Citigroup Global Markets Australia Pty Limited. (ABN 64 003 114 832 and AFSL No. 240992), participant of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. Citigroup Global Markets Australia Pty Limited is not an Authorised Deposit-Taking Institution under the Banking Act 1959, nor is it regulated by the Australian Prudential Regulation Authority. The Product is made available in Australia to Private Banking wholesale clients through Citigroup Pty Limited (ABN 88 004 325 080 and AFSL 238098). Citigroup Pty Limited provides all financial product advice to Australian Private Banking wholesale clients through bankers and relationship managers. If there is any doubt about the suitability of investments held in Citigroup Private Bank accounts, investors should contact the Citigroup Private Bank in Australia. Citigroup companies may compensate affiliates and their representatives for providing products and services to clients. The Product is made available in Brazil by Citigroup Global Markets Brasil - CCTVM SA, which is regulated by CVM - Comissão de Valores Mobiliários ("CVM"), BACEN - Brazilian Central Bank, APIMEC - Associação dos Analistas e Profissionais de Investimento do Mercado de Capitais and ANBIMA - Associação Brasileira das Entidades dos Mercados Financeiro e de Capitais. Av. Paulista, 1111 - 14º andar(parte) - CEP: 01311920 - São Paulo - SP. If the Product is being made available in certain provinces of Canada by Citigroup Global Markets (Canada) Inc. ("CGM Canada"), CGM Canada has approved the Product. Citigroup Place, 123 Front Street West, Suite 1100, Toronto, Ontario M5J 2M3. This product is available in Chile through Banchile Corredores de Bolsa S.A., an indirect subsidiary of Citigroup Inc., which is regulated by the Superintendencia de Valores y Seguros. Agustinas 975, piso 2, Santiago, Chile. The Product is made available in Germany by Citigroup Global Markets Deutschland AG ("CGMD"), which is regulated by Bundesanstalt fuer Finanzdienstleistungsaufsicht (BaFin). CGMD, Reuterweg 16, 60323 Frankfurt am Main. Research which relates to "securities" (as defined in the Securities and Futures Ordinance (Cap. 571 of the Laws of Hong Kong)) is issued in Hong Kong by, or on behalf of, Citigroup Global Markets Asia Limited which takes full responsibility for its content. Citigroup Global Markets Asia Ltd. is regulated by Hong Kong Securities and Futures Commission. If the Research is made available through Citibank, N.A., Hong Kong Branch, for its clients in Citi Private Bank, it is made available by Citibank N.A., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. Citibank N.A. is regulated by the Hong Kong Monetary Authority. Please contact your Private Banker in Citibank N.A., Hong Kong, Branch if you have any queries on or any matters arising from or in connection with this document. The Product is made available in India by Citigroup Global Markets India Private Limited (CGM), which is regulated by the Securities and Exchange Board of India (SEBI), as a Research Analyst (SEBI Registration No. INH000000438). CGM is also actively involved in the business of merchant banking and stock brokerage in India, and is registered with SEBI in this regard. CGM's registered office is at 1202, 12th Floor, FIFC, G Block, Bandra Kurla Complex, Bandra East, Mumbai -400098. CGM's Corporate Identity Number is U99999MH2000PTC126657, and its contact details are: Tel:+9102261759999 Fax:+9102261759961. The Product is made available in Indonesia through PT Citigroup Securities Indonesia. 5/F, Citibank Tower, Bapindo Plaza, Jl. Jend. Sudirman Kav. 54-55, Jakarta 12190. Neither this Product nor any copy hereof may be distributed in Indonesia or to any Indonesian citizens wherever they are domiciled or to Indonesian residents except in compliance with applicable capital market laws and regulations. This Product is not an offer of securities in Indonesia. The securities referred to in this Product have not been registered with the Capital Market and Financial Institutions Supervisory Agency (BAPEPAM-LK) pursuant to relevant capital market laws and regulations, and may not be offered or sold within the territory of the Republic of Indonesia or to Indonesian citizens through a public offering or in circumstances which constitute an offer within the meaning of the Indonesian capital market laws and regulations. The Product is made available in Israel through Citibank NA, regulated by the Bank of Israel and the Israeli Securities Authority. Citibank, N.A, Platinum Building, 21 Ha'arba'ah St, Tel Aviv, Israel. The Product is made available in Italy by Citigroup Global Markets Limited, which is authorised by the PRA and regulated by the FCA and the PRA. Via dei Mercanti, 12, Milan, 20121, Italy. The Product is made available in Japan by Citigroup Global Markets Japan Inc. ("CGMJ"), which is regulated by Financial Services Agency, Securities and Exchange Surveillance Commission, Japan Securities Dealers Association, Tokyo Stock Exchange and Osaka Securities Exchange. Otemachi Park Building, 1-1-1 Otemachi, Chiyoda-ku, Tokyo 100-8132 Japan. If the Product was distributed by SMBC Nikko Securities Inc. it is being so distributed under license. In the event that an error is found in an CGMJ research report, a revised version will be posted on the Firm's Citi Velocity website. If you have questions regarding Citi Velocity, please call (81 3) 6270-3019 for help. The product is made available in the Kingdom of Saudi Arabia in accordance with Saudi laws through Citigroup Saudi Arabia, which is regulated by the Capital Market Authority (CMA) under CMA license (17184-31). 2239 Al Urubah Rd - Al Olaya Dist. Unit No. 18, Riyadh 12214 - 9597, Kingdom Of Saudi Arabia. The Product is made available in Korea by Citigroup Global Markets Korea Securities Ltd., which is regulated by the Financial Services Commission, the Financial Supervisory Service and the Korea Financial Investment Association (KOFIA). Citibank Building, 39 Da-dong, Jung-gu, Seoul 100-180, Korea. KOFIA makes available registration information of research analysts on its website. Please visit the following website if you wish to find KOFIA registration information on research analysts of Citigroup Global Markets Korea Securities Ltd. http://dis.kofia.or.kr/websquare/index.jsp?w2xPath=/wa/fundMgr/DISFundMgrAnalystList.xml&divisionId=MDIS030020020000000&serviceId=SDIS03002

002000. The Product is made available in Korea by Citibank Korea Inc., which is regulated by the Financial Services Commission and the Financial Supervisory Service. Address is Citibank Building, 39 Da-dong, Jung-gu, Seoul 100-180, Korea. This research report is intended to be provided only to Professional Investors as defined in the Financial Investment Services and Capital Market Act and its Enforcement Decree in Korea. The Product is made available in **Malaysia** by Citigroup Global Markets Malaysia Sdn Bhd (Company No. 460819-D) ("CGMM") to its clients and CGMM takes responsibility for its contents. CGMM is regulated by the Securities Commission of Malaysia. Please contact CGMM at Level 43 Menara Citibank, 165 Jalan Ampang, 50450

Kuala Lumpur, Malaysia in respect of any matters arising from, or in connection with, the Product. The Product is made available in Mexico by Citibanamex Casa de Bolsa, S.A. De C. V., Casa de Bolsa, Integrante del Grupo Financiero Citibanamex which is a wholly owned subsidiary of Citigroup Inc. and is regulated by Comision Nacional Bancaria y de Valores. Reforma 398, Col. Juarez, 06600 Mexico, D.F. In New Zealand the Product is made available to 'wholesale clients' only as defined by s5C(1) of the Financial Advisers Act 2008 ('FAA') through Citigroup Global Markets Australia Pty Ltd (ABN 64 003 114 832 and AFSL No. 240992), an overseas financial adviser as defined by the FAA, participant of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. The Product is made available in Pakistan by Citibank N.A. Pakistan branch, which is regulated by the State Bank of Pakistan and Securities Exchange Commission, Pakistan. AWT Plaza, 1.1. Chundrigar Road, P.O. Box 4889, Karachi-74200. The Product is made available in the **Philippines** through Citicorp Financial Services and Insurance Brokerage Philippines, Inc., which is regulated by the Philippines Securities and Exchange Commission. 20th Floor Citibank Square Bldg. The Product is made available in the Philippines through Citibank NA Philippines branch, Citibank Tower, 8741 Paseo De Roxas, Makati City, Manila. Citibank NA Philippines NA is regulated by The Bangko Sentral ng Pilipinas. The Product is made available in **Poland** by Dom Maklerski Banku Handlowego SA an indirect subsidiary of Citigroup Inc., which is regulated by Komisja Nadzoru Finansowego. Dom Maklerski Banku Handlowego S.A. ul. Senatorska 16, 00-923 Warszawa. The Product is made available in the Russian Federation through AO Citibank, which is licensed to carry out banking activities in the Russian Federation in accordance with the general banking license issued by the Central Bank of the Russian Federation and brokerage activities in accordance with the license issued by the Federal Service for Financial Markets. Neither the Product nor any information contained in the Product shall be considered as advertising the securities mentioned in this report within the territory of the Russian Federation or outside the Russian Federation. The Product does not constitute an appraisal within the meaning of the Federal Law of the Russian Federation of 29 July 1998 No. 135-FZ (as amended) On Appraisal Activities in the Russian Federation. 8-10 Gasheka Street, 125047 Moscow. The Product is made available in Singapore through Citigroup Global Markets Singapore Pte. Ltd. ("CGMSPL"), a capital markets services license holder, and regulated by Monetary Authority of Singapore. Please contact CGMSPL at 8 Marina View, 21st Floor Asia Square Tower 1, Singapore 018960, in respect of any matters arising from, or in connection with, the analysis of this document. This report is intended for recipients who are accredited, expert and institutional investors as defined under the Securities and Futures Act (Cap. 289). The Product is made available by The Citigroup Private Bank in Singapore through Citibank, N.A., Singapore Branch, a licensed bank in Singapore that is regulated by Monetary Authority of Singapore. Please contact your Private Banker in Citibank N.A., Singapore Branch if you have any queries on or any matters arising from or in connection with this document. This report is intended for recipients who are accredited, expert and institutional investors as defined under the Securities and Futures Act (Cap. 289). This report is distributed in Singapore by Citibank Singapore Ltd ("CSL") to selected Citigold/Citigold Private Clients. CSL provides no independent research or analysis of the substance or in preparation of this report. Please contact your Citigold//Citigold Private Client Relationship Manager in CSL if you have any queries on or any matters arising from or in connection with this report. This report is intended for recipients who are accredited investors as defined under the Securities and Futures Act (Cap. 289). Citigroup Global Markets (Pty) Ltd. is incorporated in the Republic of South Africa (company registration number 2000/025866/07) and its registered office is at 145 West Street, Sandton, 2196, Saxonwold. Citigroup Global Markets (Pty) Ltd. is regulated by JSE Securities Exchange South Africa, South African Reserve Bank and the Financial Services Board. The investments and services contained herein are not available to private customers in South Africa. The Product is made available in the Republic of China through Citigroup Global Markets Taiwan Securities Company Ltd. ("CGMTS"), 14 and 15F, No. 1, Songzhi Road, Taipei 110, Taiwan, subject to the license scope and the applicable laws and regulations in the Republic of China. CGMTS is regulated by the Securities and Futures Bureau of the Financial Supervisory Commission of Taiwan, the Republic of China. No portion of the Product may be reproduced or quoted in the Republic of China by the press or any third parties [without the written authorization of CGMTS]. Pursuant to the applicable laws and regulations in the Republic of China, the recipient of the Product shall not take advantage of such Product to involve in any matters in which the recipient may have conflicts of interest. If the Product covers securities which are not allowed to be offered or traded in the Republic of China, neither the Product nor any information contained in the Product shall be considered as advertising the securities or making recommendation of the securities in the Republic of China. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security or financial products. Any decision to purchase securities or financial products mentioned in the Product must take into account existing public information on such security or the financial products or any registered prospectus. The Product is made available in Thailand through Citicorp Securities (Thailand) Ltd., which is regulated by the Securities and Exchange Commission of Thailand. 399 Interchange 21 Building, 18th Floor, Sukhumvit Road, Klongtoey Nua, Wattana, Bangkok 10110, Thailand. The Product is made available in Turkey through Citibank AS which is regulated by Capital Markets Board. Tekfen Tower, Eski Buvukdere Caddesi # 209 Kat 2B, 23294 Levent, Istanbul, Turkey. In the U.A.E., these materials (the "Materials") are communicated by Citigroup Global Markets Limited, DIFC branch ("CGML"), an entity registered in the Dubai International Financial Center ("DIFC") and licensed and regulated by the Dubai Financial Services Authority ("DFSA") to Professional Clients and Market Counterparties only and should not be relied upon or distributed to Retail Clients. A distribution of the different Citi Research ratings distribution, in percentage terms for Investments in each sector covered is made available on request. Financial products and/or services to which the Materials relate will only be made available to Professional Clients and Market Counterparties. The Product is made available in **United Kingdom** by Citigroup Global Markets Limited, which is authorised by the Prudential Regulation Authority ("PRA") and regulated by the Financial Conduct Authority ("FCA") and the PRA. This material may relate to investments or services of a person outside of the UK or to other matters which are not authorised by the PRA nor regulated by the FCA and the PRA and further details as to where this may be the case are available upon request in respect of this material. Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. The Product is made available in United States by Citigroup Global Markets Inc, which is a member of FINRA and registered with the US Securities and Exchange Commission. 388 Greenwich Street, New York, NY 10013. Unless specified to the contrary, within EU Member States, the Product is made available by Citigroup Global Markets Limited, which is authorised by the PRA and regulated by the FCA and the PRA. The Product is not to be construed as providing investment services in any jurisdiction where the provision of such services would not be permitted. Subject to the nature and contents of the Product, the investments described therein are subject to fluctuations in price and/or value and investors may get back less than originally invested. Certain high-volatility investments can be subject to sudden and large falls in value that could equal or exceed the amount invested. Certain investments contained in the Product may have tax implications for private customers whereby levels and basis of taxation may be subject to change. If in doubt, investors should seek advice from a tax adviser. The Product does not purport to identify the nature of the specific market or other risks associated with a particular transaction. Advice in the Product is general and should not be construed as personal advice given it has been prepared without taking account of the objectives, financial situation or needs of any particular investor. Accordingly, investors should, before acting on the advice, consider the appropriateness of the advice, having regard to their objectives, financial situation and needs. Prior to acquiring any financial product, it is the client's responsibility to obtain the relevant offer document for the product and consider it before making a decision as to whether to purchase the product. Citi Research product may source data from dataCentral. dataCentral is a Citi Research proprietary database, which includes the Firm's estimates, data

from company reports and feeds from Thomson Reuters. The source for all referenced prices, unless otherwise stated, is DataCentral. Past performance is not a guarantee or reliable indicator of future results. Forecasts are not a guarantee or reliable indicator of future performance. The printed and printable version of the research report may not include all the information (e.g., certain financial summary information and comparable company data) that is linked to the online version available on the Firm's proprietary electronic distribution platforms.

© 2019 Citigroup Global Markets Inc. Citi Research is a division of Citigroup Global Markets Inc. Citi and Citi with Arc Design are trademarks and service marks of Citigroup Inc. and its affiliates and are used and registered throughout the world. All rights reserved. The research data in this report is not intended to be used for the purpose of (a) determining the price or amounts due in respect (or to value) of one or more financial products or instruments and/or (b) measuring or comparing the performance of a financial product, a portfolio of financial instruments, or a collective investment undertaking, and any such use is strictly prohibited without the prior written consent of Citi Research. Any unauthorized use, duplication, redistribution or disclosure of this report (the "Product"), including, but not limited to, redistribution of the Product by electronic mail, posting of the Product on a website or page, and/or providing to a third party a link to the Product, is prohibited by law and will result in prosecution. The information contained in the Product is intended solely for the recipient and may not be further distributed by the recipient to any third party. Where included in this report, MSCI sourced information is the exclusive property of Morgan Stanley Capital International Inc. (MSCI). Without prior written permission of MSCI, this information and any other MSCI intellectual property may not be reproduced, redisseminated or used to create any financial products, including any indices. This information is provided on an "as is" basis. The user assumes the entire risk of any use made of this information. MSCI, its affiliates and any third party involved in, or related to, computing or compiling the information hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability or fitness for a particular purpose with respect to any of this information. Without limiting any of the foregoing, in no event shall MSCI, any of its affiliates or any third party involved in, or related to, computing or compiling the information have any liability for any damages of any kind. MSCI, Morgan Stanley Capital International and the MSCI indexes are services marks of MSCI and its affiliates. Part of this product may contain Sustainalytics proprietary information that may not be reproduced, used, disseminated, modified nor published in any manner without the express written consent of Sustainalytics. Sustainalytics, its affiliates and any third party involved in, or related to, computing or compiling the information hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability or fitness for a particular purpose with respect to any of this information. Any information attributed to Sustainalytics is provided solely for informational purposes and on its own should not be considered an offer to buy or sell a security. Neither Sustainalytics nor all its third-party suppliers provide investment advice (as defined in the applicable jurisdiction) or any other form of (financial) advice. The information is provided "as is" and, therefore Sustainalytics assumes no responsibility for errors or omissions. Sustainalytics cannot be held liable for damage arising from the use of this product or information contained herein in any manner whatsoever. The Firm accepts no liability whatsoever for the actions of third parties. The Product may provide the addresses of, or contain hyperlinks to, websites. Except to the extent to which the Product refers to website material of the Firm, the Firm has not reviewed the linked site. Equally, except to the extent to which the Product refers to website material of the Firm, the Firm takes no responsibility for, and makes no representations or warranties whatsoever as to, the data and information contained therein. Such address or hyperlink (including addresses or hyperlinks to website material of the Firm) is provided solely for your convenience and information and the content of the linked site does not in any way form part of this document. Accessing such website or following such link through the Product or the website of the Firm shall be at your own risk and the Firm shall have no liability arising out of, or in connection with, any such referenced website.

ADDITIONAL INFORMATION IS AVAILABLE UPON REQUEST

