

Interest Rates Research

9 March 2020

#liquiditysqueeze

US Money Markets

Bifurcating Treasury market structure: What the TRACE data reveal

Despite the size and depth of the Treasury market, our understanding of traded activity, venues, and counterparties is somewhat limited. The Treasury and FINRA (Financial Industry Regulatory Authority) began collecting more detailed data in 2017 and will begin publishing these statistics this week.

We examine the structure of the Treasury market with a focus on what the TRACE (Trade Reporting and Compliance Engine) data reveal about the activity on electronic platforms and by principal trading firms (PTFs).

- Daily trading volumes are concentrated in the most recently issued securities particularly the 5y, 10y, and 2y.
- Nonetheless, activity in off-the-run issues is still significant at \$175bn/day. Daily trading in bills is approximately \$100bn/day.
- Treasuries trade in two roughly equally sized markets interdealer and dealer-tocustomer (DTC). The interdealer market is largely electronic, while the DTC market is traded via voice.
- Primary dealers still make up the bulk of Treasury trading across both platforms (51%), but PTFs account for 20% of daily trading activity.
- However, PTF activity is concentrated on electronic interdealer platforms where they account for 60% of activity. They mostly trade the on-the-run (OTR) or most recently issued coupons.
- About one-third of electronic trading on these platforms is between two PTFs.
 Another 55% involves trades between a PTF and a non-PTF.
- Bills and off-the-runs account for most DTC activity. Transaction sizes are typically larger than on the interdealer platform.

The TRACE data reveal two different Treasury markets. Structural changes as well as differences in the behavior of dealers and PTFs may account for perceptions of reduced liquidity and heightened liquidity risk in periods of market stress.

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

PLEASE SEE ANALYST CERTIFICATIONS AND IMPORTANT DISCLOSURES STARTING AFTER PAGE 5

Joseph Abate +1 212 412 7459 joseph.abate@barclays.com BCI, US

www.barclays.com

Platforms and counterparties

Dealer Treasury trading activity can be split into two segments: activity with interdealer brokers and activity directly with customers (DTC). On either sector, trading can be done electronically/automated or by voice (over the telephone). Voice activity, however, is increasing electronic. "Request for quote" systems allow clients to solicit bids and offers on one platform to several dealers simultaneously. Principal trading firms (PTFs) have become important liquidity providers. These firms trade for their own account and frequently do not have clients. They typically employ algorithmic or high frequency trading strategies and generally end the day flat – that is they do not hold risk positions overnight.

Data collection

The Treasury and other regulators recognized that their understanding of the causes of the October 2014 "flash rally" was hampered by a lack of data. While the Federal Reserve has been collecting Treasury volume data for decades, the most detailed information is limited to trades in which one leg goes through a primary dealer. Counterparty activity is limited to interdealer activity and a residual "other" category meant to capture dealer-to-customer (DTC) activity. The Fed only began collecting data on activity on the on-the-run (OTR) or most recently issued securities in the past few years.

Federal Reserve data: What we know

According to the primary dealer statistics, average daily Treasury volume this year has been around \$560bn/day. Activity has hovered near this level for several years – although it jumped to \$750bn/day in the week ending February 26 (Figure 1). About 60% of the trading is on the OTR issues. Approximately two-thirds of daily average OTR volume occurs in just three issues: 5y, 10y, and 2y notes. Daily volume in the OTR 5y is about \$70bn/day this year. Activity in the 10y and 2y is \$65bn/day and \$45bn/day, respectively. This year, daily average trading in bills is about \$122bn/day or about 20% of overall primary dealer Treasury trading volumes. Daily activity in TIPs is around \$20bn/day.

Roughly one-third of primary dealer trading occurs through interdealer brokers. The remainder is with "others," which includes customers, other dealers and the Federal Reserve. This interdealer share, however, is biased lower as we include bills, TIPs and FRNs in the total. Close to half of primary dealer trading in the OTR coupons occurs on interdealer platforms.



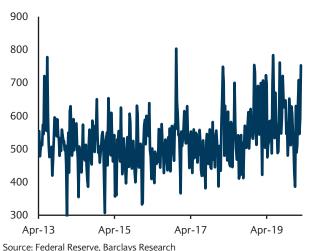


FIGURE 2
Treasury trading activity (%)



Note: Using TRACE data. Source: Federal Reserve, Barclays Research

How useful is the Fed's data?

Primary dealers account for about 50% of daily trading across both the interdealer and DTC segments of the Treasury market. However, if primary dealers are making markets and providing liquidity in roughly half of the daily Treasury market activity, who (and how) is intermediating in the other half?

Dealer concentration

Primary dealer Treasury trading is concentrated. Of the 24 primary dealers, the top five (by activity) generally have a market share exceeding 50%. In coupons, the highest concentration is in the bond sector where these dealers account for nearly 60% of trading in securities with maturities longer than 11y. In the bill market, their market share is about 52%. Primary dealer concentrations are even higher in the less actively traded securities such as FRNs and TIPs. There the top five dealers account for between 60 and 68% of daily trading depending on the maturity of the security.

Within the top five, we suspect activity is also concentrated, although this is harder to show. In coupons, the smallest of the top five dealers has a market share of between 7 and 8%. The remaining four dealers split up the remaining 40% of the daily market activity. By comparison, the Treasury tri-party repo market appears to be somewhat less concentrated. There, the top three dealers (by volume) share about 25% of the activity.

TRACE data collection

Since July 2017, FINRA member firms have been required to report their Treasury transactions through the TRACE (Trade Reporting and Compliance Engine) system. TRACE reporting requirements apply to bills, coupons, FRNs, TIPs, and STRIPs. It does not apply to repo or to securities purchased at a Treasury auction. TRACE data, however, include all when-issued transactions. Trades between FINRA members are reported by both counterparties. Last April, FINRA began collecting counterparty data on trades executed by interdealer brokers together with more information on PTF activity.

Weekly TRACE data will be released this month

The Treasury and FINRA will begin releasing weekly aggregated Treasury TRACE data this week. The volume data will be divided across maturity buckets by OTR and off-the-run issues. Keep in mind that all the data that Treasury and FINRA will be releasing is aggregated – they will not be releasing activity in individual CUSIPs. Volume statistics will be split further into interdealer and DTC activity. Data on PTF activity, however, is for official use only.

What we are learning

The Treasury released a few preliminary statistics last fall and the Federal Reserve Bank of New York has done some analysis of the data as well.¹

Daily activity is concentrated in OTRs...

The TRACE data corroborate some of the details in the primary dealer statistics. Overall trading volume was around \$575bn/day over the period between August 2017 and July 2018.² This is somewhat (12%) higher than the corresponding primary dealer statistics from the Federal Reserve. However, trading volumes in the TRACE data are also skewed to the OTR issues – about 70% of daily TRACE activity is in the most recently issued coupons (compared to 60% in the Fed data). Among the OTRs, most activity is in the 5y (\$115bn/day), followed by the 10y (\$93bn/day), and 2y notes (\$52bn/day).³

¹ See, "Remarks of Deputy Secretary Justin Muzinich at the 2019 US Treasury Market Structure Conference", September 23, 2019, Federal Reserve Bank of New York. See also, "Unlocking the Treasury Market through TRACE", September 28, 2018 and "Breaking Down TRACE Volumes Down Further", November 29, 2018, both by D. Bain, M. De Pooter, D. Dobrev, M. Fleming, P. Johansson, C. Jones, F. Keane, M. Puglia, L. Reiderman, T. Rodrigues, and O. Shachar, Federal Reserve Bank of New York.

 $^{^{\}rm 2}\,$ "Unlocking the Treasury Market through TRACE", September 28, 2018

³ Ibid.

...but there is still significant activity in vintage issues

Although trading is tilted to the OTR issues, activity in vintage issues is still significant. On average, \$175bn/day in these issues changes hands. Unlike the OTRs, trading is roughly evenly distributed across maturities. There appears to be a "novelty" dimension to trading in the off-the-runs – activity in issues further from their original issue date is lighter. That said, vintage securities more than three issues away from the OTR still account for an average of \$64bn/day in trading – roughly 14% of coupon activity.⁴

Two different markets

PTFs are 21% of overall daily Treasury trading...

...but over 60% of electronic interdealer activity

Just over half of daily Treasury trading volume is done through primary dealers. PTFs and buy side firms such as insurance companies account for the rest (Figure 2). This distribution of daily trading volume has been fairly steady – at least since August 2017. Within the two segments, trading volumes in the interdealer and DTC markets are roughly equal and each accounts for about half of the reported \$575bn/day that trades in the Treasury market.

In the interdealer market, trading is roughly equally divided between primary dealers and PTFs. Buy-side firms account for the remaining 10%. Interdealer trading is both electronic (or automated) and voice. As PTFs' trading strategies are skewed toward algorithmic and high frequency transactions, it is not surprising that they account for over 60% of the electronic or automated interdealer market. About one-third of the trading on automated interdealer platforms is between two PTFs. Another 55% of interdealer trades is between PTFs and non-PTFs.

By contrast, primary dealers perform most of their interdealer trading by voice. They account for approximately 80% of all interdealer voice trading. Buy-side firms also tend to do more of their trading in the voice interdealer market.

PTF activity is concentrated in OTRs – they do very little trading in the off-the-run issues. By contrast, primary dealers trade a wider mix of securities. They are the principal market makers in off-the-runs, bills, FRNs, and TIPs. The frequency of their trades is lower than for PTFs, but their transaction sizes tend to be significantly larger.

Has market structure caused changes in liquidity?

The TRACE data reveal two key points. First, there is significantly more activity in the off-the-runs than was initially feared following the introduction of the leverage ratio in 2015. Primary dealers make markets in these securities – as well as bills, FRNs, and TIPs – often in large lots and as agents for customers as well as themselves. Moreover, market making is not limited to recently issued securities – even very old vintages trade and account for about 14% of daily activity.

Second, liquidity provision in the Treasury market is bifurcated: OTRs trade in a separate market with a different set of market makers than other Treasuries. PTFs play a significant intermediating role in the OTR market – but elsewhere their activity is non-existent. This reflects the nature of their trading activity as well as their structure. Without clients and typically less capital than primary dealers, the PTFs have very little ability to sit on inventories of unsold Treasuries. As a result, they limit their activity to trading only the most liquid issues (the OTRs) in the deepest (electronic) venues. By contrast, primary dealers can act as agents for their clients as well as take proprietary positions like the PTFs. Because they can hold inventories and do not need to end the evening flat, they have more capacity to wait out market swings and slowly distribute their holdings.

Have changes in market structure affected liquidity in the Treasury market? This raises questions about how the behavior of dealers and PTFs may be different in response to a sudden shock. If PTFs have little capacity to hold onto issues – until calmer markets return, say the next day – is the liquidity they provide from market making less

⁴ "Breaking Down TRACE Volumes Further," November 29, 2018

resilient than that provided by dealers? In particular, while a primary dealer might widen its bid-ask spreads as a precaution, a PTF might pull all its bids and offers.

A number of studies have focussed on the "flash rally" in October 2014 for clues about market behavior and liquidity provision.⁵ Bouveret et al. found that dealers reduced liquidity provision by widening bid-ask spreads and pulling offers while PTFs reduced the quantities offered.⁶ However, some have noted that liquidity in the OTRs – where PTFs are most active – has not declined.⁷ Others, however, argue that changes in market structure beyond just the activity of PTFs have contributed to a reduction in liquidity. For example, since the financial crisis, dealers have less tolerance for market risk and more activity has shifted to electronic platforms where there is greater price transparency.⁸ Still others suggest that overall liquidity in the Treasury market for both OTR and off the runs has not changed, rather liquidity has become more flighty, that is, less resilient. In turn, this has increased liquidity risk – at least in OTRs.⁹

In any event, the TRACE data and the recent dramatic rally in Treasuries will provide more information about how the structure of the Treasury market is evolving.

⁵ See Joint Staff Report, "The US Treasury Market on October 15, 2014," US Treasury, Federal Reserve, Securities and Exchange Commission, and Commodity Futures Trading Commission, July 13, 2015

⁶ See, "Fragilities in the US Treasury Market: Lessons from the 'Flash Rally' of October 15, 2014", A. Bouveret, P. Breuer, Y. Chen, D. Jones, and T. Sasaki, IMF, October 2015.

See "A Deeper Look at Liquidity Conditions in the Treasury Market", J. Clark and G. Mann, US Treasury, May, 6, 2016
 Bouveret, op. cit.

⁹ See "Has Liquidity Risk in the Treasury and Equity Markets Increased?" T. Adrian, M. Fleming, D. Stackman, and E. Voqt, Federal Reserve Bank of New York, Liberty Street Economics, October 6, 2015.

Analyst Certification

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

Important Disclosures:

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

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

Availability of Disclosures:

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

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

All pricing information is indicative only. Unless otherwise indicated, prices are sourced from Refinitiv and reflect the closing price in the relevant trading market, which may not be the last available price at the time of publication.

Types of investment recommendations produced by Barclays FICC Research:

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

Disclosure of other investment recommendations produced by Barclays FICC Research:

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

Legal entities involved in producing Barclays Research:

Barclays Bank PLC (Barclays, UK)

Barclays Capital Inc. (BCI, US)

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

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

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

Barclays Securities Japan Limited (BSJL, Japan)

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

Barclays Capital Canada Inc. (BCCI, Canada)

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

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

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

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

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

Disclaimer:

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

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

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

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

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

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

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

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

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

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

This material is distributed in Mexico by Barclays Bank Mexico, S.A. This material is distributed in the Cayman Islands and in the Bahamas by Barclays Capital Inc., which it is not licensed or registered to conduct and does not conduct business in, from or within those jurisdictions and has not filed this material with any regulatory body in those jurisdictions.

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

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

All Indian securities-related research and other equity research produced by Barclays' Investment Bank are distributed in India by Barclays Securities (India) Private Limited (BSIPL). BSIPL is a company incorporated under the Companies Act, 1956 having CIN U67120MH2006PTC161063. BSIPL is registered and regulated by the Securities and Exchange Board of India (SEBI) as a Research Analyst: INH000001519; Portfolio Manager INP000002585;

Stock Broker/Trading and Clearing Member: National Stock Exchange of India Limited (NSE) Capital Market INB231292732, NSE Futures & Options INF231292732, NSE Currency derivatives INE231450334, Bombay Stock Exchange Limited (BSE) Capital Market INB011292738, BSE Futures & Options INF011292738; Depository Participant (DP) with the National Securities & Depositories Limited (NSDL): DP ID: IN-DP-NSDL-299-2008; Investment Adviser: INA000000391. The registered office of BSIPL is at 208, Ceejay House, Shivsagar Estate, Dr. A. Besant Road, Worli, Mumbai – 400 018, India. Telephone No: +91 2267196000. Fax number: +91 22 67196100. Any other reports produced by Barclays' Investment Bank are distributed in India by Barclays Bank PLC, India Branch, an associate of BSIPL in India that is registered with Reserve Bank of India (RBI) as a Banking Company under the provisions of The Banking Regulation Act, 1949 (Regn No BOM43) and registered with SEBI as Merchant Banker (Regn No INM000002129) and also as Banker to the Issue (Regn No INBI00000950). Barclays Investments and Loans (India) Limited, registered with RBI as Non Banking Financial Company (Regn No RBI CoR-07-00258), and Barclays Wealth Trustees (India) Private Limited, registered with Registrar of Companies (CIN U93000MH2008PTC188438), are associates of BSIPL in India that are not authorised to distribute any reports produced by Barclays' Investment Bank.

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

This material is distributed to persons in Australia by Barclays Bank PLC. None of Barclays Bank PLC, nor any other Barclays group entity, holds an Australian financial services licence and instead relies on an exemption from the requirement to hold such a licence. This material is intended to only be distributed to "wholesale clients" as defined by the Australian Corporations Act 2001. This material is distributed in New Zealand by Barclays Bank PLC, but it has not been registered, filed or approved by any New Zealand regulatory authority or under or in accordance with the Financial Markets Conduct Act of 2013, and this material is not a disclosure document under New Zealand law.

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

This material is distributed in the United Arab Emirates (including the Dubai International Financial Centre) and Qatar by Barclays Bank PLC. Barclays Bank PLC in the Dubai International Financial Centre (Registered No. 0060) is regulated by the Dubai Financial Services Authority (DFSA). Principal place of business in the Dubai International Financial Centre: The Gate Village, Building 4, Level 4, PO Box 506504, Dubai, United Arab Emirates. Barclays Bank PLC-DIFC Branch, may only undertake the financial services activities that fall within the scope of its existing DFSA licence. Related financial products or services are only available to Professional Clients, as defined by the Dubai Financial Services Authority. Barclays Bank PLC in the UAE is regulated by the Central Bank of the UAE and is licensed to conduct business activities as a branch of a commercial bank incorporated outside the UAE in Dubai (Licence No.: 13/1844/2008, Registered Office: Building No. 6, Burj Dubai Business Hub, Sheikh Zayed Road, Dubai City) and Abu Dhabi (Licence No.: 13/952/2008, Registered Office: Al Jazira Towers, Hamdan Street, PO Box 2734, Abu Dhabi). This material does not constitute or form part of any offer to issue or sell, or any solicitation of any offer to subscribe for or purchase, any securities or investment products in the UAE (including the Dubai International Financial Centre) and accordingly should not be construed as such. Furthermore, this information is being made available on the basis that the recipient acknowledges and understands that the entities and securities to which it may relate have not been approved, licensed by or registered with the UAE Central Bank, the Dubai Financial Services Authority or any other relevant licensing authority or governmental agency in the UAE. The content of this report has not been approved by or filed with the UAE Central Bank or Dubai Financial Services Authority. Barclays Bank PLC in the Qatar Financial Centre (Registered No. 00018) is authorised by the Qatar Financial Centre Regulatory Authority (QFCRA). Barclays Bank PLC-QFC Branch may only undertake the regulated activities that fall within the scope of its existing QFCRA licence. Principal place of business in Qatar: Qatar Financial Centre, Office 1002, 10th Floor, QFC Tower, Diplomatic Area, West Bay, PO Box 15891, Doha, Qatar. Related financial products or services are only available to Business Customers as defined by the Qatar Financial Centre Regulatory Authority.

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

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

© Copyright Barclays Bank PLC (2020). All rights reserved. No part of this publication may be reproduced or redistributed in any manner without the prior written permission of Barclays. Barclays Bank PLC is registered in England No. 1026167. Registered office 1 Churchill Place, London, E14 5HP. Additional information regarding this publication will be furnished upon request.

BRCF2242