

A Practical Guide to Dealing with Accounting Dead-Lock

Andrew Crean
+44 207 986 3975
andrew.crean@citi.com

This presentation was prepared on 8th November

See Appendix A-1 for Analyst Certification and important disclosures.

2008 Citigroup Research is a division of Citigroup Global Markets Inc. (the "Firm"), which does and seeks to do business with companies covered in its research reports. As a result, investors should be aware that the Firm may have a conflict of interest that could affect the objectivity of this report. Investors should consider this report as only a single factor in making their investment decision. Non-US research analysts who have prepared this report are not registered/qualified as research analysts with the NYSE and/or NASD. Such research analysts may not be associated persons of the member organization and therefore may not be subject to the NYSE Rule 472 and NASD Rule 2711 restrictions on communications with a subject company, public appearances and trading securities held by a research analyst account.

Customers of the Firm in the United States can receive independent third-party research on the company or companies covered in this report, at no cost to them, where such research is available. Customers can access this independent research at <http://www.smithbarney.com> (for retail clients) or <http://www.citigroupgeo.com> (for institutional clients) or can call (866) 836-9542 to request a copy of this research.

Is Accounting to Blame For Battered Insurers?

- n **IASB – Failure of IFRS Phase I – Fudge/ No global standard**
- n **CFO Forum EEV (2004): Enacted to correct the failure of traditional EV in 2002/03, but...**
 - n Asset risk premia still capitalised
 - n Transparency and comparability not achieved
 - n Self-serving behaviour exposed – Taiwan/ liquidity premiums
 - n No group-wide view mandated
 - n No linkage from value to cash
- n **Accounting schism – UK to EV, continental Europe to IFRS**
- n **Capital uncertainty – regulatory or rating agency, formulaic or economic**
- n **Analysts split – EV/ cash vs IFRS, return to asset management model (FUM roll forward, revenue margin, cost: income ratio)**

Confused investors walk away

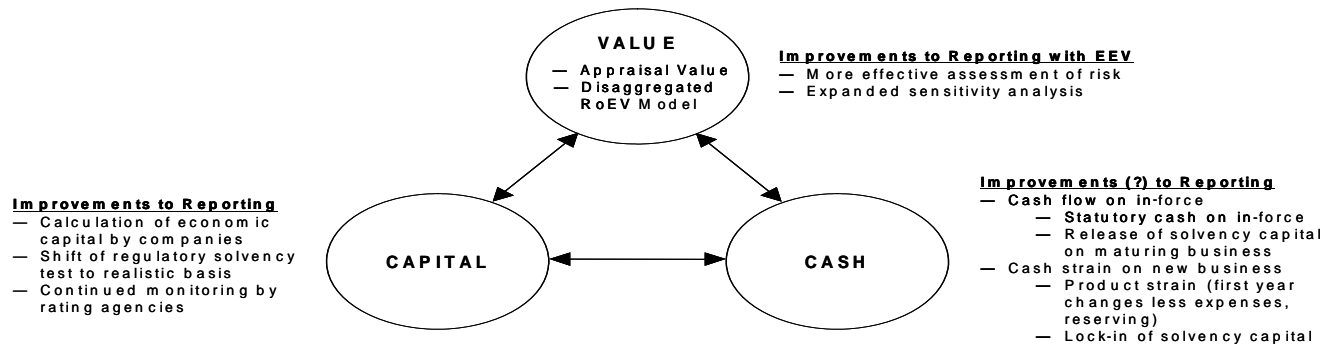
Our Accounting Philosophy

- n **Accounting / valuation approach should dovetail with**
 - n The nature of the product – uncertain profit at point of sale
 - n The way the business is managed internally
- n **Since the concept of profit in insurance is based on assumptions...**
- n **...It follows that EV accounting is the most appropriate metric**
- n **But insurance analysts have a dual role**
 - n Forecast the future development of sales / margins
 - n Audit whether the profit assumed under EV monetizes into cash as expected and, if not, why not – particular attention to operational assumptions and variances
- n **Alongside the EV metrics, analysts want**
 - n The monetization into cash on the in-force book and a rationale of the uses between immediate payout and investment in new business (IRRs vs IDRs, cash payback)
 - n Deeper insights into the cash dynamics of in-force portfolios – FUM roll forwards, revenue drivers (fees, spreads, risk margins), cost drivers (commission, acq. costs, maintenance costs, per policy servicing information)

CFO Forum MCEV – Key Wins

- n **Group-wide view of EV balance-sheet & profit: healing the schism?**
- n **Reliability and comparability improved through MCEV adoption**
 - n No pre-booking of asset risk premia
 - n Analysts no longer audit economic assumptions: solid PVFP, TVOG, COC calculation
 - n Cost of residual non-hedgeable risks – issue of materiality
- n **A prescribed template for showing the information builds trust**
- n **More transparent exposition of cash emergence from life EV**
- n **External audit of *results* as well as *methodology & assumptions***
- n **A trinity of value (EV), cash (from EV) and capital (Solvency II?)**

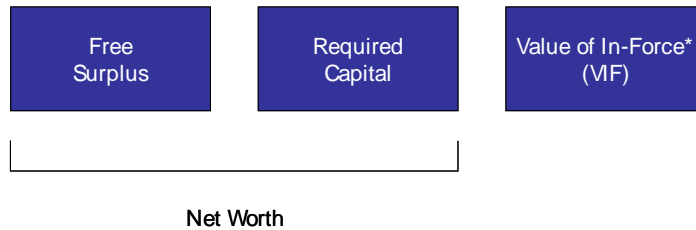
Value, Cash and Capital Considerations in an Insurance Company



Source: Citigroup Investment Research

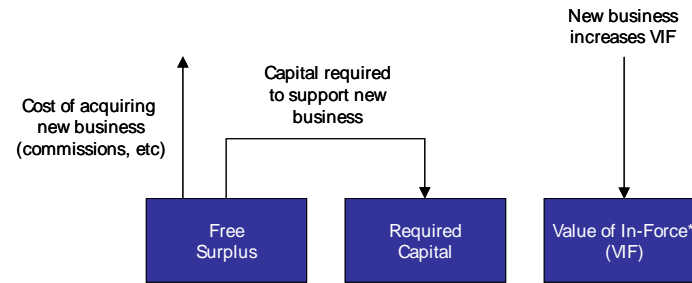
From Value to Cash: The Extra Mile

Figure 1. Components of Embedded Value



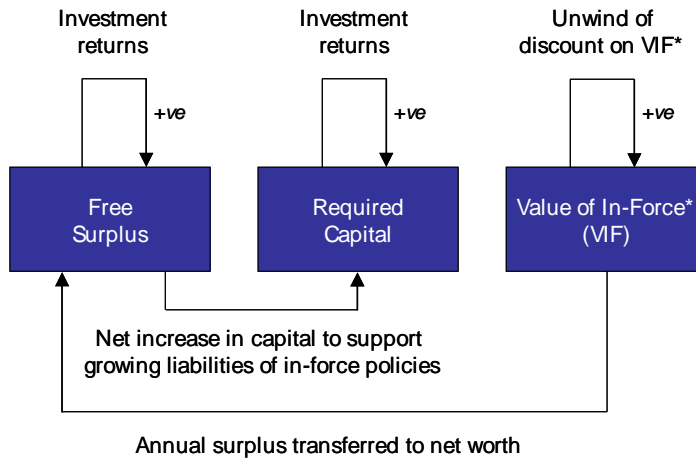
Source: Prudential

Figure 2. Cash Impact When Writing New Business



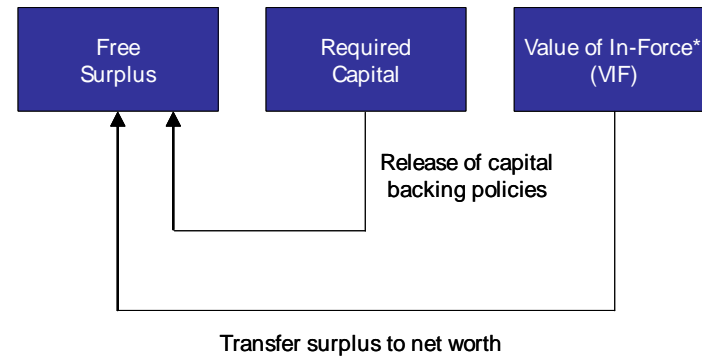
Source: Prudential

Figure 3. Cash Impact as a Policy Develops within the In-Force



Source: Prudential

Figure 4. Cash Impact in the Year the Policy Matures



Source: Prudential

Beyond MCEV: Core Changes

n Group-wide template improvements

- n Free surplus/ required capital and VIF split for non-covered business
- n Group-wide sensitivity tests

Goal: audited and consistent approach to cash/ free capital generation

Impact: supplant IFRS as the accepted 'cash' proxy?

CFOForum Template for Presentation of Group-Wide MCEV Analysis of Earnings

	Covered Bus. MCEV	Non-Covered Bus. IFRS	Total Group MCEV
Opening Group MCEV			
Opening adjustments			
Adjusted opening Group MCEV			
Operating MCEV earnings			
Non-operating MCEV earnings			
Other movements in IFRS net equity			
Closing adjustments			
Closing Group MCEV			

Source: CFOForum — Market-Consistent Embedded Value Principles — June 2008

Beyond MCEV: Core Changes

- n **Back Book Analysis** – better understanding of the internal workings of the in-force development
 - n **Reserve roll-forward** for asset accumulation business
 - Goal:** Better appreciation of growth dynamics
 - n More detailed **disclosure on experience** variances/ assumption changes – split by lapse, expenses, mortality/ morbidity, tax, other; ‘bandwidth’ issues; new business profit triangles by ‘accident year’
 - Goal:** Better audit of value to cash
 - n Greater **detail on in-force drivers** 1) split VIF between separate a/c, general a/c savings & general a/c risk business; 2) Show revenue split between fees, investment margins, risk revenues; 3) split expenses between renewal commission / maintenance expenses
 - Goal:** Better understanding of earnings drivers

Beyond MCEV: Core Changes

Friends Provident — Detailed In-Force Cash Generation Analysis for 2007 (Pounds in Millions)

	Protection	Pensions	Annuities	Inv & Savings	With-Profits & Other	Total UK	FPI	Lombard	Int	Total
FUM Roll Forward										
— FUMs at Start Year	—	5,488	—	3,061	13,161	—	3,882	7,760	11,642	—
— Gross Flow	—	2,183	—	—	—	—	—	—	—	—
— Transfers/ Redemptions	—	(474)	—	—	—	—	—	—	—	—
— Net Flow	—	1,709	—	—	—	—	—	—	—	—
— Market Movement	—	398	—	—	—	—	—	—	—	—
— FUMs at End Year	—	7,595	—	3,208	12,246	—	5,022	10,060	15,082	—
— % Change	—	38%	—	5%	-7%	—	29%	30%	30%	—
In-Force Value										
— Start Year	379	436	29	188	459	1,491	212	328	540	2,031
— End year	242	456	7	157	398	1,260	225	385	610	1,870
— % Change	-36%	5%	-76%	-16%	-13%	-15%	6%	17%	13%	-8%
In-Force/ FUMs										
— Start Year	—	7.9%	—	6.1%	3.5%	—	5.5%	4.2%	4.6%	—
— End year	—	6.0%	—	4.9%	3.3%	—	4.5%	3.8%	4.0%	—
In-Force Cash Generation										
— AUCs	0	63	0	25	51	139	26	56	82	221
— Maintenance Costs	(14)	(17)	0	(4)	(19)	(54)	(14)	(17)	(31)	(85)
— Other (revenue/ reserve chges)	58	(10)	5	(7)	55	101	32	3	35	136
— Total (pre-tax)	44	36	5	14	87	186	44	42	86	272
— Tax (& other)	—	—	—	—	—	(18)	(13)	(13)	(26)	(44)
— Total (net)	—	—	—	—	—	168	31	29	60	228
As % of Average FUMs										
— AUCs	—	0.96%	—	0.80%	0.40%	—	0.58%	0.63%	0.61%	—
— Maintenance Costs	—	-0.26%	—	-0.13%	-0.15%	—	-0.31%	-0.19%	-0.23%	—
— Other (revenue/ reserve chges)	—	-0.15%	—	-0.22%	0.43%	—	0.72%	0.03%	0.26%	—
— Total (pre-tax)	—	0.55%	—	0.45%	0.68%	—	0.99%	0.47%	0.64%	—
— Total (net): normalised tax rate	—	0.39%	—	0.31%	0.48%	—	0.70%	0.33%	0.45%	—
As % of Start Year In-Force										
— Total (net): normalised tax rate	8.1%	5.8%	12.1%	5.2%	13.3%	8.7%	14.6%	8.8%	11.1%	11.2%

Source: Citi Investment Research and company data

Beyond MCEV: Core Changes

- n **Front Book Analysis** – better understanding of the dynamics of writing new business

- n **IRRs, IDRs and cash payback periods** – made mandatory

Goal: Clarity on the economics of investing in new business

- n Greater **detail on new business drivers** 1) split NBP between separate a/c, general a/c savings & general a/c risk business; 2) Show split of product strain between initial commissions and acquisition costs;

Goal: Better understanding of earnings drivers

- n **Cash Projections**

- n **VIF Maturity profile** - prospective view of in-force monetization

- n Cash **signature** on **new business**

Goal: Facilitate cash projection analysis

Beyond MCEV: Core Changes

Friends Provident — Detailed New Business Product Strain Analysis Net of Tax for 2007 (Pounds in Millions)

	Protection	Pensions				Annuities	Inv & Savings	Total UK	FPI	Lombard	Int	Total
		Group E	Ind E	DWP E	Total							
PVNBP	413	2,611	504	140	3,255	273	501	4,442	1,235	1,985	3,220	7,662
Year One Product Strain												
— Commission	(92)	(52)	(20)	0	(72)	0	(31)	(195)	(134)	(24)	(158)	(353)
— Acq Expenses	(72)	(65)	(14)	(1)	(80)	(7)	(14)	(173)	(20)	(34)	(54)	(227)
— Other	124	6	1	0	7	17	9	157	85	17	102	259
— Total (pre-tax)	(40)	(111)	(33)	(1)	(145)	10	(36)	(211)	(69)	(41)	(110)	(321)
— Total (net)	(28)	(78)	(23)	(1)	(102)	7	(25)	(148)	(48)	(29)	(77)	(225)
Strain as % of PVNBP												
— Commission	-22.3%	-2.0%	-4.0%	0.0%	-2.2%	0.0%	-6.2%	-4.4%	-10.9%	-1.2%	-4.9%	-4.6%
— Acq Expenses	-17.4%	-2.5%	-2.8%	-0.7%	-2.5%	-2.6%	-2.8%	-3.9%	-1.6%	-1.7%	-1.7%	-3.0%
— Other	30.0%	0.2%	0.2%	0.0%	0.2%	6.2%	1.8%	3.5%	6.9%	0.9%	3.2%	3.4%
— Total (pre-tax)	-9.7%	-4.3%	-6.5%	-0.7%	-4.5%	3.7%	-7.2%	-4.8%	-5.6%	-2.1%	-3.4%	-4.2%
— Total (net)	-6.8%	-3.0%	-4.6%	-0.5%	-3.1%	2.6%	-5.0%	-3.3%	-3.9%	-1.5%	-2.4%	-2.9%
IRR*	10.2%	8.4%	9.0%	—	9.3%	—	7.6%	10.9%	17.5%	29.8%	23.2%	13.8%
IDR (partially estimated)	5.0%	7.8%	7.8%	7.8%	7.8%	12.0%	7.8%	7.8%	6.1%	7.5%	7.0%	7.4%
Cash Payback*	10	20	20	0	19	0	29	14	6	4	5	10
Net New Business Profit*												
— Pounds in Millions	18	16	4	8	29	8	1	55	27	50	77	133
— As % of PVNBP	4.2%	0.6%	0.8%	6.0%	0.9%	3.1%	0.1%	1.2%	2.2%	2.5%	2.4%	1.7%

* These figures (net of tax) are after development expense capitalisation and are based on year-end 2007 economic assumptions.

Source: Citi Investment Research and company data

Beyond MCEV: Best Practice

- n **Develop best practice (aided by consulting actuaries) in**
 - n A common approach for the ‘charge for *non-hedgeable risks*’
 - n **Required capital** – Indication of where rating agency capital sits
 - n A common approach to calculating **new business profits** – point of sale/ end year, opening/ closing or point of sale assumption basis
 - n More colour on ‘**expected return on EV**’ – reference rate, equity/ property risk, interest rate risk, credit risk, volatility
 - n **Expanded sensitivity tests**: 1) credit risks; 2) change in gradient of the swap curve; 3) exchange impacts; 4) discursive information on cliff guarantee points

Beyond MCEV: Future Template

Suggested Template for MCEV Disclosures

	VF						Non-Covered (IFRS)				Group MCEV	
	Free Surplus	Required Capital	Separate Account	Gen. A/C (saving)	General A/C (risk)	Total	Covered MCEV	Free surplus	Required Capital	Op. Business		Total
Reserve Roll Forward												
<i>Opening reserves</i>	-	-	X	X	X	X	-	-	-	X	-	-
<i>Opening adjustments</i>												
— Acquired/ divested business	-	-	X	X	X	X	-	-	-	X	-	-
— Foreign exchange variance	-	-	X	X	X	X	-	-	-	X	-	-
Adjusted opening reserves	-	-	X	X	X	X	-	-	-	X	-	-
<i>Income</i>												
— Premiums	-	-	X	X	X	X	-	-	-	X	-	-
— Investment Returns	-	-	X	X	X	X	-	-	-	X	-	-
— Sub-Total	-	-	X	X	X	X	-	-	-	X	-	-
<i>Outgo</i>												
— Claims on maturity/ event risk trigger	-	-	X	X	X	X	-	-	-	X	-	-
— Claims on surrender	-	-	X	X	X	X	-	-	-	X	-	-
— Expenses	-	-	X	X	X	X	-	-	-	X	-	-
— Other	-	-	X	X	X	X	-	-	-	X	-	-
— Sub-Total	-	-	X	X	X	X	-	-	-	X	-	-
Closing reserves	-	-	X	X	X	X	-	-	-	X	-	-

Continued on next slide

Beyond MCEV: Future Template

Suggested Template for MCEV Disclosures (Continued)

	MF						Non-Covered (IFRS)				Group MCEV	
	Free Surplus	Required Capital	Separate Account	Gen. A/C (saving)	General A/C (risk)	Total	Covered MCEV	Free surplus	Required Capital	Op. Business		Total
MCEV Analysis												
Opening MCEV	X	X	X	X	X	X	X	X	X	-	X	X
Opening adjustments	X	X	X	X	X	X	X	X	X	-	X	X
Adjusted opening MCEV	X	X	X	X	X	X	X	X	X	-	X	X
New business value	X	X	X	X	X	X	X	-	-	-	-	-
Expected existing business contribution												
— At the reference rate	X	X	X	X	X	X	X	X	X	X	X	X
— In excess of the reference rate												
— Equity/ property risk	X	X	X	X	X	X	X	X	X	X	X	X
— Interest rate risk	X	X	X	X	X	X	X	X	X	X	X	X
— Credit risk	X	X	X	X	X	X	X	X	X	X	X	X
— Volatility risk	X	X	X	X	X	X	X	X	X	X	X	X
— sub-total	X	X	X	X	X	X	X	X	X	X	X	X
Transfers from MF and required capital to free surplus	X	X	X	X	X	X	X	X	X	X	X	X
Experience variances												
— Persistency	X	X	X	X	X	X	X	-	-	-	-	-
— Mortality/ morbidity	X	X	X	X	X	X	X	-	-	-	-	-
— Expenses	X	X	X	X	X	X	X	-	-	-	-	-
— Other	X	X	X	X	X	X	X	-	-	-	-	-
Assumption changes												
— Persistency	X	X	X	X	X	X	X	-	-	-	-	-
— Mortality/ morbidity	X	X	X	X	X	X	X	-	-	-	-	-
— Expenses	X	X	X	X	X	X	X	-	-	-	-	-
— Other	X	X	X	X	X	X	X	-	-	-	-	-
Other operating variance	X	X	X	X	X	X	X	-	-	-	-	-
Operating MCEV earnings	X	X	X	X	X	X	X	X	X	X	X	X
Economic variances												
— Equity/ property risk	X	X	X	X	X	X	X	X	X	X	X	X
— Interest rate risk	X	X	X	X	X	X	X	X	X	X	X	X
— Credit risk	X	X	X	X	X	X	X	X	X	X	X	X
— Volatility risk	X	X	X	X	X	X	X	X	X	X	X	X
— Impact of own debt	X	X	X	X	X	X	X	-	-	-	-	X
Other non operating variance	X	X	X	X	X	X	X	X	X	X	X	X
Total MCEV earnings	X	X	X	X	X	X	X	X	X	X	X	X
Other movements in IFRS net equity	-	-	-	-	-	-	-	X	X	X	X	X
Closing adjustments												
— Acquired/ divested business	X	X	X	X	X	X	X	X	X	X	X	X
— Foreign exchange variance	X	X	X	X	X	X	X	X	X	X	X	X
— Capital/ dividend flows	X	X	X	X	X	X	X	X	X	X	X	X
Closing MCEV	X	X	X	X	X	X	X	X	X	X	X	X

Continued on next slide

Beyond MCEV: Future Template

Suggested Template for MCEV Disclosures (Continued)

	MF						Non-Covered (IFRS)				Group MCEV	
	Free Surplus	Required Capital	Separate Account	Gen. A/C (saving)	General A/C (risk)	Total	Covered MCEV	Free surplus	Required Capital	Op. Business		Total
Additional Information												
New Business												
Product Strain												
— Commission	—	—	X	X	X	X	—	—	—	X	—	—
— Acquisition Costs	—	—	X	X	X	X	—	—	—	X	—	—
— Other	—	—	X	X	X	X	—	—	—	X	—	—
— Total	—	—	X	X	X	X	—	—	—	X	—	—
Solvency Strain	—	—	X	X	X	X	—	—	—	X	—	—
IRR on New Business	—	—	X	X	X	X	—	—	—	—	—	—
IDR on New Business	—	—	X	X	X	X	—	—	—	—	—	—
Payback period (Yrs)	—	—	X	X	X	X	—	—	—	—	—	—
In-Force												
Revenue												
— Fees	—	—	X	X	X	X	—	—	—	—	—	—
— Investment Margin	—	—	X	X	X	X	—	—	—	—	—	—
— Risk Revenues	—	—	X	X	X	X	—	—	—	—	—	—
— Sub-Total	—	—	X	X	X	X	—	—	—	—	—	—
Expenses												
— Renewal Commissions	—	—	X	X	X	X	—	—	—	—	—	—
— Maintenance Expenses	—	—	X	X	X	X	—	—	—	—	—	—
— Sub-Total	—	—	X	X	X	X	—	—	—	—	—	—
IDR on In-Force	—	—	X	X	X	X	—	—	—	—	—	—

Source: Citi Investment Research

The Future of Insurance Accounting

- n **What Next? We wait** – given past experience, analysts will await implementation (up to eighteen months away for the Swiss & Dutch)
- n **Will the market coalesce around MCEV?**
 - n **Healing the Schism** – Will managements of European firms focus more attention on the group-wide EV figures and base targets on EV rather than IFRS yardsticks?
 - n **IFRS Inadequacies** – Will analysts expose the inconsistencies in current IFRS?
 - n **The linkage to cash** – Will the CFO Forum mandate a common template for disclosing group cash/ free capital generation information?
 - n **The linkage to capital** – Will Solvency II closely follow the market-consistent line
 - n How will the **IASB Working Party** on IFRS II react – can global consensus be established? If not, will it rubber-stamp MCEV?

Appendix A-1

Analyst Certification

Each research analyst(s), strategist(s) or research associate(s) responsible for the preparation and content of this research report hereby certifies that, with respect to each issuer or security that the research analyst, strategist or research associate covers in this research report, all of the views expressed in this research report accurately reflect their personal views about those issuer(s) or securities. Each research analyst(s) strategist(s) or research associate(s) also certify that no part of their compensation was, is, or will be, directly or indirectly, related to the specific recommendation(s) or view(s) expressed by that research analyst, strategist or research associate in this research report.

IMPORTANT DISCLOSURES

Analysts' compensation is determined based upon activities and services intended to benefit the investor clients of Citigroup Global Markets Inc. and its affiliates ("the Firm"). Like all Firm employees, analysts receive compensation that is impacted by overall firm profitability, which includes revenues from, among other business units, the Private Client Division, Institutional Sales and Trading, and Investment Banking.

For important disclosures (including copies of historical disclosures) regarding the companies that are the subject of this Citi Investment Research product ("the Product"), please contact Citi Investment Research, 388 Greenwich Street, 29th Floor, New York, NY, 10013, Attention: Legal/Compliance. 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 www.citigroup.com. Private Client Division clients should refer to www.smithbarney.com/research. Valuation and Risk assessments can be found in the text of the most recent research note/report regarding the subject company. Historical disclosures (for up to the past three years) will be provided upon request.

Citi Investment Research Ratings Distribution

Data current as of 19 July 2007

	Buy	Hold	Sell
Citi Investment Research Global Fundamental Coverage (3320)	47%	39%	14%
% of companies in each rating category that are investment banking clients	71%	70%	70%

Guide to Fundamental Research Investment Ratings:

Citi Investment Research's stock recommendations include a risk rating and an investment rating.

Risk ratings, which take into account both price volatility and fundamental criteria, are: Low (L), Medium (M), High (H), and Speculative (S).

Investment ratings are a function of Citi Investment Research's expectation of total return (forecast price appreciation and dividend yield within the next 12 months) and risk rating.

For securities in developed markets (US, UK, Europe, Japan, and Australia/New Zealand), investment ratings are: Buy (1) (expected total return of 10% or more for Low-Risk stocks, 15% or more for Medium-Risk stocks, 20% or more for High-Risk stocks, and 35% or more for Speculative stocks); Hold (2) (0%-10% for Low-Risk stocks, 0%-15% for Medium-Risk stocks, 0%-20% for High-Risk stocks, and 0%-35% for Speculative stocks); and Sell (3) (negative total return).

For securities in emerging markets (Asia Pacific, Emerging Europe/Middle East/Africa, and Latin America), investment ratings are: Buy (1) (expected total return of 15% or more for Low-Risk stocks, 20% or more for Medium-Risk stocks, 30% or more for High-Risk stocks, and 40% or more for Speculative stocks); Hold (2) (5%-15% for Low-Risk stocks, 10%-20% for Medium-Risk stocks, 15%-30% for High-Risk stocks, and 20%-40% for Speculative stocks); and Sell (3) (5% or less for Low-Risk stocks, 10% or less for Medium-Risk stocks, 15% or less for High-Risk stocks, and 20% or less for Speculative stocks).

Investment ratings are determined by the ranges described above at the time of initiation of coverage, a change in investment and/or risk rating, or a change in target price (subject to limited management discretion). At other times, the expected total returns may fall outside of these ranges because of market price movements and/or other short-term volatility or trading patterns. Such interim deviations from specified ranges will be permitted but will become subject to review by Research Management. Your decision to buy or sell a security should be based upon your personal investment objectives and should be made only after evaluating the stock's expected performance and risk.

Guide to Corporate Bond Research Credit Opinions and Investment Ratings:

Citi Investment Research's corporate bond research issuer publications include a fundamental credit opinion of Improving, Stable or Deteriorating and a complementary risk rating of Low(L), Medium(M), High (H) or Speculative (S) regarding the credit risk of the company featured in the report. The fundamental credit opinion reflects the CIR analyst's opinion of the direction of credit fundamentals of the issuer without respect to securities market vagaries. The fundamental credit opinion is not geared to, but should be viewed in the context of debt ratings issued by major public debt ratings companies such as Moody's Investors Service, Standard and Poor's, and Fitch Ratings. CBR risk ratings are approximately equivalent to the following matrix: Low Risk Triple A to Low Double A; Low to Medium Risk High Single A through High Triple B; Medium to High Risk Mid Triple B through High Double B; High to Speculative Risk Mid Double B and Below. The risk rating element illustrates the analyst's opinion of the relative likelihood of loss of principal when a fixed income security issued by a company is held to maturity, based upon both fundamental and market risk factors. Certain reports published by Citi Investment Research will also include investment ratings on specific issues of companies under coverage which have been assigned fundamental credit opinions and risk ratings. Investment ratings are a function of Citi Investment Research's expectations for total return, relative return (to publicly available Citi group bond indices performance), and risk rating. These investment ratings are: Buy/Overweight the bond is expected to outperform the relevant Citi group bond market sector index (Broad Investment Grade, High Yield Market or Emerging Market), performances of which are updated monthly and can be viewed at <http://sd.ny.ssnrb.com/> using the "Indexes" tab; Hold/Neutral Weight the bond is expected to perform in line with the relevant Citi group bond market sector index; or Sell/Underweight the bond is expected to underperform the relevant sector of the Citi group indexes.

OTHER DISCLOSURES

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 subject company(ies) 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.

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. 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). 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 Investment Research does not set a predetermined frequency for publication, if the Product is a fundamental research report, it is the intention of Citi Investment Research to provide research coverage of the/those issuer(s) mentioned therein, including in response to news affecting this issuer, subject to applicable quiet periods and capacity constraints. 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.

Investing in non-US securities, including ADRs, may entail certain risks. The securities of non-US 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.

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 to wholesale clients through Citigroup Global Markets Australia Pty Ltd. (ABN64 003 114 832 and AFSL No. 240992) and to retail clients through Citi Smith Barney Pty Ltd. (ABN19 009 145 555 and AFSL No. 240813), Participants of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW2000. The Product is made available in Australia to Private Banking wholesale clients through Citigroup Pty Limited (ABN88 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 - CCTMISA, which is regulated by CVM - Comissão de Valores Mobiliários, BACEN - Brazilian Central Bank, APIMEC - Associação dos Analistas e Profissionais de Investimento do Mercado de Capitais and ANEID - Associação Nacional dos Bancos de Investimento. Av. Paulista, 1111 - 11º andar - 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 M5J2M8. The Product may not be distributed to private clients in Germany. The Product is distributed in Germany by Citigroup Global Markets Deutschland AG & Co. KGaA, which is regulated by Bundesanstalt fuer Finanzdienstleistungsaufsicht (BaFin). Frankfurt am Main, Reuterweg 16, 60323 Frankfurt am Main. If the Product is made available in Hong Kong by, or on behalf of, Citigroup Global Markets Asia Ltd., it is attributable to Citigroup Global Markets Asia Ltd., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. Citigroup Global Markets Asia Ltd. is regulated by Hong Kong Securities and Futures Commission. If the Product is made available in Hong Kong by The Citigroup Private Bank to its clients, it is attributable to Citibank NA, Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. The Citigroup Private Bank and Citibank NA is regulated by the Hong Kong Monetary Authority. The Product is made available in India by Citigroup Global Markets India Private Limited, which is regulated by Securities and Exchange Board of India. Bakhtawar, Nariman Point, Mumbai 400-021. The Product is made available in Indonesia through PT Citigroup Securities Indonesia. 5/F, Citibank Tower, Bapindo Plaza, J. 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. If the Product was prepared by Citi Investment Research and distributed in Japan by Nikko Citigroup Limited ("NCL"), it is being so distributed under license. If the Product was prepared by NCL and distributed by Nikko Cordial Securities Inc., Citigroup Global Markets Inc., or Monex, Inc. it is being so distributed under license. NCL is regulated by Financial Services Agency, Securities and Exchange Surveillance Commission, Japan Securities Dealers Association, Tokyo Stock Exchange and Osaka Securities Exchange. Shin-Marunouchi Building, 1-5-1 Marunouchi, Chiyoda-ku, Tokyo 100-6520 Japan. In the event that an error is found in an NCL research report, a revised version will be posted on Citi Investment Research's Global Equities Online (GEO) website. If you have questions regarding GEO please call (81 3) 5574-4860 for help. The Product is made available in Korea by Citigroup Global Markets Korea Securities Ltd., which is regulated by Financial Supervisory Commission and the Financial Supervisory Service. Hungkuk Life Insurance Building, 226 Shinmunno 1-GA, Jongno-Gu, Seoul, 110-061. The Product is made available in Malaysia by Citigroup Global Markets Malaysia Sdn Bhd, which is regulated by Malaysia Securities Commission. Menara Citibank, 165 Jalan Ampang, Kuala Lumpur, 50450. The Product is made available in Mexico by Acciones y Valores Banamex, S.A. De C. V., Casa de Bolsa, which is regulated by Comisión Nacional Bancaria y de Valores. Reforma 398, Col. Juárez, 06600 Mexico, D.F. In New Zealand the Product is made available through Citigroup Global Markets New Zealand Ltd., a Participant of the New Zealand Exchange Limited and regulated by the New Zealand Securities Commission. Level 19, Mobile on the Park, 157 Lambton Quay, Wellington. The Product is made available in Poland by Dom Maklerski Banku Handlowego SA an indirect subsidiary of Citigroup Inc., which is regulated by Komisja Papierów Wartościowych i Geld. Bank Handlowy w Warszawie SA ul. Senatorska 16, 00-923 Warszawa. The Product is made available in the Russian Federation through ZAO 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 Gashka Street, 125047 Moscow. The Product is made available in Singapore through Citigroup Global Markets Singapore Pte. Ltd., a Capital Markets Services Licence holder, and regulated by Monetary Authority of Singapore. 1 Temasek Avenue, #39-02 Millenia Tower, Singapore 039192. 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. 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 Taiwan through Citigroup Global Markets Inc. (Taipei Branch), which is regulated by Securities & Futures Bureau. No portion of the report may be reproduced or quoted in Taiwan by the press or any other person. No. 8 Manhattan Building, Hsin Yi Road, Section 5, Taipei 100, Taiwan. The Product is made available in Thailand through Citicorp Securities (Thailand) Ltd., which is regulated by the Securities and Exchange Commission of Thailand. 18/F, 22/F and 29/F, 82 North Sathorn Road, Silom, Bangkok, Bangkok 10500, Thailand. The Product is made available in United Kingdom by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. This material may relate to investments or services of a person outside of the UK or to other matters which are not regulated by the FSA 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 regulated by NASD, NYSE and 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 regulated by Financial Services Authority. Many European regulators 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 Investment Research's Products can be found at www.citigroup.com. Compensation of equity research analysts is determined by equity research management and Citigroup's senior management and is not linked to specific transactions or recommendations. The Product may have been distributed simultaneously, in multiple formats, to the Firm's worldwide institutional and retail customers. The Product is not to be construed as providing investment services in any jurisdiction where the provision of such services would be illegal. 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

This Product is not intended for distribution in Poland. Any receipt or review of the Product in Poland is not authorized by the Firm.

© 2007 Citigroup Global Markets Inc. (© Nikko Citigroup Limited, if this Product was prepared by it). Citi Investment Research is a division and service mark of Citigroup Global Markets Inc. and its affiliates and is used and registered throughout the world. Citigroup and the Umbrella Device are trademarks and service marks of Citigroup or its affiliates and are used and registered throughout the world. Nikko is a registered trademark of Nikko Cordial Corporation. All rights reserved. Any unauthorized use, duplication, redistribution or disclosure 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. 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 anyway 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/IMPORTANT DISCLOSURES
