### Annex 2

Scrutiny of Treasury Management Activities

### **TONBRIDGE & MALLING BOROUGH COUNCIL**

### FINANCE and PROPERTY ADVISORY BOARD

26 May 2010

### **Report of the Director of Finance**

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision

### 1 TREASURY MANAGEMENT UPDATE

This report provides an overview of treasury management activities undertaken during the financial year to-date in the context of the national economy and invites Members to recommend endorsement of the action taken to Cabinet.

### 1.1 Introduction

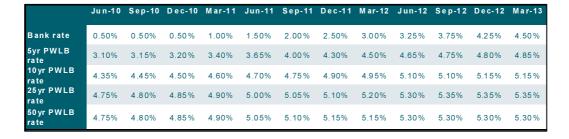
- 1.1.1 CIPFA issued the revised Code of Practice for Treasury Management in November 2009, following consultation with Local Authorities during the summer. The revised Code was adopted by the Council on 18 February 2010 and suggests that Members should be informed of Treasury Management activities at least twice a year, but preferably quarterly. This report, therefore, ensures this Council is embracing Best Practice in accordance with CIPFA's revised Code of Practice.
- 1.1.2 As part of the adoption process I committed to reviewing and re-issuing our Treasury Management Practices (TMPs). I am pleased to advise Members the review will be completed shortly and that the new TMPs will be subject to scrutiny by the Audit Committee on 21 June 2010.
- 1.1.3 Members should be aware that Sector has offered a compliance audit service to their public sector clients at a cost of £2,500. Whilst I believe that our adoption of the revised Code of Practice and updated TMPs has addressed the compliance issues fully, I am conscious that confirmation of our doing so via an independent party may add a comfort factor that might be welcomed. Accordingly I would welcome learning of Members views on this matter.
- 1.1.4 Members might like to know that the Treasury Management Outturn Report for 2009/10 is to be considered by Cabinet on 16 June. Should any questions arise when the report is published, please contact my Exchequer Services Manager John Pickup on extension 6112 in the first instance.

### 1.2 Economic Background

- 1.2.1 The first four months of 2010 saw:
  - The first official estimate of UK GDP for 2010 indicating the economy had managed to avoid a 'double-dip' recession and expand at 0.2% during the first quarter;
  - Retail sales proving to be volatile after being hit by bad weather and the VAT increase in January and fell by 2.3% in April;
  - The recovery continue to fail to create new jobs, despite which unemployment is expected to hold at 8% when the April figures are announced before starting to decline;
  - Pay growth remaining weak;
  - The UK's trade position begin to improve, helped by the weak pound;
  - House prices edging upwards, perhaps more because of a shortage of supply rather than a general increase in prices. A view which seems to be borne out by the continued low volume of mortgage approvals;
  - The former Chancellor revise downwards his forecast for public sector borrowing in the Budget;
  - The Monetary Policy Committee pause QE and keep official interest rates on hold at 0.5% in May; and
  - The CPI and RPI inflation indices reach 3.4% and 4.4% respectively.
- 1.2.2 The Monetary Policy Committee (MPC) response to all of the above signals was to vote to keep official interest rates on hold at 0.5% in May and to continue to pause its programme of quantitative easing (QE).

### 1.3 Interest Rate Forecast

1.3.1 The Council's Treasury Advisor, Sector, provides the following forecast:



- 1.3.2 The forecast is based upon the following assumptions:
  - Moderate economic recovery and MPC inflation forecast being below target in two years' time;
  - The first Bank Rate increase coming in 2011; and reaching 4.5% by March 2013;

- Long term PWLB rates are expected to steadily increase to reach 5.30% by early 2013 due to huge gilt issuance, reversal of QE and investor concerns over inflation;
- The balance of risks is weighted to the downside; and
- There is still some risk of a "double dip" recession.
- 1.3.3 There is considerable uncertainty in all forecasts due to the difficulties of forecasting the timing and amounts of QE reversal, the fiscal effect of a general election, speed of recovery of banks profitability and balance sheet position, changes in the consumer saving ratio and the rebalancing of the UK economy in terms of export and import.

### 1.4 Treasury Management Strategy Statement

- 1.4.1 The Treasury Management Strategy Statement (TMSS) for 2010/11 was approved by Council on 18 February 2010. The Council's Annual Investment Strategy, which is incorporated in the TMSS, outlines the Council's investment priorities as follows:
  - Security of Capital
  - Liquidity
- 1.4.2 The Council will also aim to achieve the optimum return (yield) on investments commensurate with the proper levels of security and liquidity. In the current economic climate it is considered appropriate to keep investments short term, and to only invest with highly credit rated financial institutions, using Sector's suggested creditworthiness approach, including sovereign credit rating and Credit Default Swap (CDS) overlay information provided by Sector.
- 1.4.3 A full list of investments held as at 7 May 2010, a copy of the most recent counterparty lists and the Sector monthly report on internally managed investments, are shown in [Annexes 1 to 3] of this report.
- 1.4.4 As illustrated in the economic background section above, investment rates available in the market are at an historical low point. The average level of cash flow funds available for investment purposes in April 2010 was £7.0m. These funds were available on a temporary basis, and the level of funds available was mainly dependent on the timing of precept payments, receipt of grants and progress on the capital programme. The authority holds £21.5m of core cash balances for investment purposes, of which £16.5m is managed by our external fund manager. These funds are for the most part available to invest for more than one year, albeit that around £3m will need to be recalled during 2010/11 to fund the capital programme.

Performance for the month     of April together with     current balance and     interest earned is set out in the table below:	Funds invested at 30 Apr 10 £m	Average maturity years	Gross return %	7 Day Libid Benchmark %	Interest earned £
In-house cash flow – excl of Landsbanki	8.24	0.01	0.74	0.48	4,250
In-house core funds	5.00	1.14	6.65	0.48	27,350
Externally managed core funds	16.58	0.73	0.77	0.48	10,550
Total	29.82	0.60	1.80	0.48	42,150

- 1.4.5 As illustrated, the authority outperformed the benchmark by 132 basis points (bp).
- 1.4.6 One of the key contributions to the 132bp level of out-performance came from the two internally managed core investments with Barclays and Nationwide. Attention is drawn to the fact that the time to maturity exceeds the 6 month duration rating suggested by Sector and, therefore, applicable in respect of new investments undertaken in accordance with the Treasury Management Strategy for 2010/11.
- 1.4.7 The Treasury management team continue to monitor these investments closely and consider that the implicit support of HMG for those counterparties provides sufficient comfort to not call for premature repayment.

### 1.5 Borrowing

1.5.1 It is a statutory duty for the Council to determine and keep under review the "Affordable Borrowing Limits" by way of the Prudential Indicators (affordability limits) set out in the approved TMSS. In this regard it is confirmed that no borrowing was undertaken in April 2010.

### 1.6 Legal Implications

1.6.1 The contract with Landsbanki remains in default and action is now being taken by Bevan and Brittan, our legal advisors, to confirm local authority depositors' status as **priority creditors**. It is expected local authorities' cases will be referred to

court shortly. A number of authorities have been selected by the Winding Up Boards as "Test Cases" in order to allow the full range of issues to be argued before the Icelandic courts. The subsequent judgements will not be automatically binding on other cases. Therefore, to ensure the earliest possible resolution of matters for all authorities, the winding up boards have been invited to refer all authorities' claims to the court now.

1.6.2 As the court processes in Iceland are likely to take around 12 months, it is not expected that any part of the defaulted investment will be repaid during this financial year.

### 1.7 Financial and Value for Money Considerations

- 1.7.1 Despite the outperformance against the benchmark returns for the month of April fall short of the budgeted investment return of £50,100 by just under £8,000. Members should be aware that a shortfall at this level is likely to persist if, as is now expected, interest rates remain abnormally low for the remainder of the financial year and Barclays exercise their option to seek to repay their high coupon loan in July.
- 1.7.2 A variation to the budget for investment income is, therefore, likely and this will be brought forward to Members for consideration at the revised estimate stage.
- 1.7.3 Budget provision of £2,500 will need to be made if it is decided to proceed with the Sector compliance audit of the treasury management function.

### 1.8 Risk Assessment

- 1.8.1 The application of best practice, in the form of regular reporting and scrutiny of treasury management activities, as identified by the CIPFA Code is considered to be the most effective way of mitigating the risks associated with treasury management.
- 1.8.2 In respect of the Landsbanki investment participation in the joint action coordinated by the Local Government Association is still thought to offer the greatest chance of recovering the defaulted loan and associated interest.
- 1.8.3 At this time the added risk associated with continuing to hold the in-house core investments with Barclays and Nationwide beyond the duration rating suggested by Sector is not thought to outweigh the loss of income that would result from seeking early repayment.

### 1.9 Recommendations

### 1.9.1 Members are **RECOMMENDED** to:

1) Endorse the action taken by officers in respect of recent treasury management activities; and to

contact: John Pickup

2) **RECOMMEND** that Cabinet do likewise.

Background papers:

Correspondence/email with the Local Government Association
Reporting template provided by Sector Treasury Services.

Sharon Shelton Director of Finance

Annex 2
Scrutiny of Treasury Management Activities

		Investment Su	ımmary as a	t 07 May 20	10						
Counterparty	Investment from	Maturity Date	Investment at coupon value £	Coupon Rate of return	% of total investments	Instrument type	Mangement type	Core/ Cash flow	Externally managed	Internally managed	Cash flow
Alliance & Leicester	07/05/2010	10/05/2010	2,000,000	0.800%		Call	Internally Managed	Cash		2,000,000	2,000,000
Alliance & Leicester Total			2,000,000		6.02%						
Bank of Scotland	07/05/2010	10/05/2010	2,000,000	0.800%		Call	Internally Managed	Cash		2,000,000	2,000,000
Bank of Scotland			2,000,000		6.02%						
Barclays Bank	10/09/2009	10/09/2010	2,000,000	0.720%		CDs	Externally Managed	Core	2,000,000		
Barclays Bank calls 19/7/10 & 17/1/11	17/07/2008	16/07/2011	2,500,000	7.050%		Fixed deposit	Internally Managed	Core		2,500,000	
Barclays Bank Total			4,500,000		13.55%						
BNP Paribas	05/05/2010	05/08/2010	1,700,000	0.530%		CDs	Externally Managed	Core	1,700,000		
BNP Paribas			1,700,000		5.12%						
Blackrock	07/05/2010	10/05/2010	2,133,000			Call - MM	Internally Managed	Cash		2,133,000	2,133,000
Blackrock Total	40/00/0000	00/00/0040	2,133,000	0.4000/	6.42%	E D	E 1	0	700 000		
European Investment Bank	16/02/2009	06/08/2010	700,000 <b>700,000</b>	0.430%	0.440/	Euro Bond	Externally Managed	Core	700,000		
European Investment Bank	07/05/2010	10/05/2010	2,500,000	0.490%	2.11%	Call - MM	lutamalla Mananal	Cash		0.500.000	0.500.000
Insight Insight	07/05/2010	10/05/2010	2,500,000 <b>2,500,000</b>	0.490%	7.53%	Call - IVIIVI	Internally Managed	Cash		2,500,000	2,500,000
Landsbanki Islands	30/07/2008	In default	1,000,000	5.860%	7.55%	Fixed deposit	Internally Managed	Cash		1,000,000	1,000,000
Landsbanki Islands Total	30/07/2000	III deladit	1,000,000	3.000 /6	3.01%	i ixed deposit	internally Manageu	Casii		1,000,000	1,000,000
National Westminster Bank CIBA	07/05/2010	10/05/2010	2,018,000	0.800%	3.0176	Call	Internally Managed	Cash		2,018,000	2,018,000
National Westminster Bank CIBA	0770372010	10/03/2010	2,018,000	0.00070	6.08%	Call	internally Manageu	Casii		2,010,000	2,010,000
Nationwide BS	30/03/2010	30/12/2010	1,500,000	1.030%	0.0070	CDs	Externally Managed	Core	1,500,000		
Nationwide BS	28/05/2008	27/05/2011	2,500,000	6.250%		Fixed deposit	Internally Managed	Core	1,000,000	2,500,000	
Nationwide BS Total			4,000,000		12.05%		gou			2,000,000	
National Australian Bank	08/04/2010	08/07/2010	400,000	0.570%		CDs	Externally Managed	Core	400,000		
National Australian Bank Total			400,000		1.20%		, ,		, , , , , , , , , , , , , , , , , , ,		
Rabobank	05/05/2010	05/05/2011	1,600,000	1.340%		CDs	Externally Managed	Core	1,600,000		
Rabobank Total			1,600,000		4.82%		. •				
UK Treasury	23/02/2010	17/05/2010	6,100,000	0.470%		Treasury Bond	Externally Managed	Core	6,100,000		
UK Treasury	19/04/2010	10/07/2010	1,000,000	0.480%		Treasury Bond	Externally Managed	Core	1,000,000		
UK Treasury	30/03/2010	27/09/2010	1,500,000	0.480%		Treasury Bond	Externally Managed	Core	1,500,000		
UK Treasury			8,600,000		25.90%						
Investec/Citibank uninvested balance			50,396	0.250%		F Mgr cash bal	Externally Managed	Core	50,396		
Investec/Citibank uninvested balance			50,396		0.15%						
Total invested			33,201,396		100.00%				16,550,396	16,651,000	11,651,000
Number of investments	18	Average investment	1.845.000								

### **Treasury Management Report – Lending Lists**

Internal Lending List of Tonbridge and Malling Borough Council Checked against Sector Duration Matrix dated 07/05/10 subject to specific approval by DoF/CA for subject to approva **Duration** by 2 of DOF, CA Government Direct
Guarantee or investment in Rating Must Counterparty L/Term S/Term Country not be less duration limit if > bank amounts of over £2m overnight. Alliance & Leicester - wholly owned Implicit guarantee by HMG AAA GBR AA-F1+ В £2m Overnight unless sub of Santander - Group limit £5m plus expected support from approved as above hen max 6 months Bank of Scotland Plc - Group limit GBR Now part of Lloyds and AAA £2m Overnight unless approved as above with HBOS and Lloyds TSBC 0f £5m covered by the implicit quarantee from HMG then max 12 months Barclays Bank plc Implicit guarantee by HMG Overnight unless AAA GBR AA-F1+ В £2m approved as above hen max 6 months DMADF - a/c HMG HM Govt GBR Government owned £10m Overnight unless approved as above then max 3 months HSBC Bank plc Implicit guarantee by HMG GBR AA F1+ В Overnight unless £2m approved as above then max 12 months Lloyds TSB Bank - Group limit with HBOS and BOS of £5m Implicit guarantee by HMG AAA GBR AA-F1+ С 1 £2m Overnight unless approved as above then max 12 months National Westminster Bank (RBS) Implicit guarantee by HMG AAA GBR AA-F1+ 1 £2m Overnight unless Group limit with RBS and Ulster Ban approved as above then max 12 months Nationwide Building Society Implicit guarantee by HMG AAA GBR AA-F1+ В 1 £2m Overnight unless approved as above hen max 6 months The Royal Bank of Scotland plc -GBR D/E Implicit guarantee by HMG AAA AA-F1+ 1 £2m Overnight unless Group limit with Nat West and Ulster approved as above Bank of £10m then max 12 months Santander - Formerly Abbey plc -Implicit guarantee by HMG GBR Overnight unless AAA В £2m wholly owned sub of Santander plus expected support from approved as above Group limit with A&L of £5m parent. then max 6 months Svenska Handelsbanken AAA SWE F1+ AA-В £2m Overnight unless approved as above then max 12 HMG GBR UK Government Gilts AAA Guaranteed by HMG 1 vear £2m UK Local Authorities HMG Secured on revenues of authority £2m 1 year Money Market Funds - Global Treasury Funds Implicit support of HMG via £2.5m Overnight only Implicit support of HMG via GBR AAA/MR1+ AAA - Insight £2.5m Overnight only - Goldman Sachs Implicit support of HMG via AAA GBR AAA/MR1+ AAA £2.5m Overnight only - Blackrock Implicit support of HMG via AAA GBR AAA/MR1+ AAA £2.5m Overnight only IRBS Approved by Director of Finance on 10 May 2010

Sector rating & duration limit	N/C	G	R	0	В	Р		
•								
	0 days	3 month	6 months	1 year	1 year	2 years	TMBC	

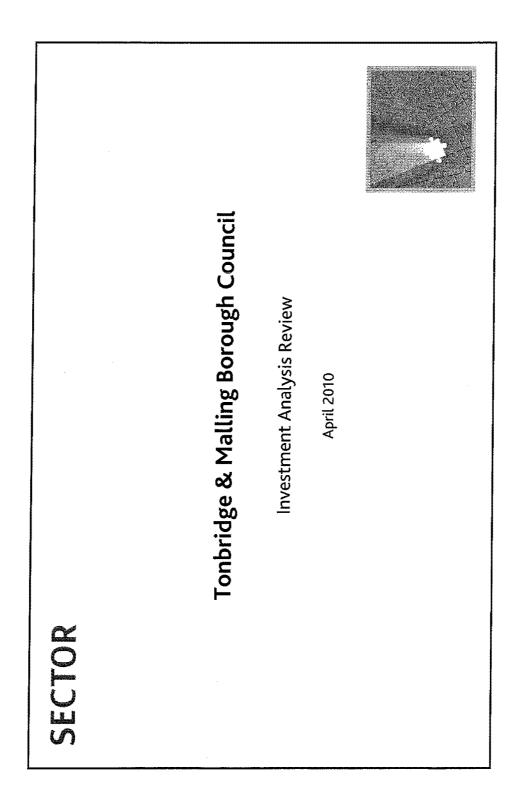
The Sector duration colours have been faithfully represented above. However, the duration adopted by TMBC and ecorded in the duration limit column may in some cases be less than that suggested by Sector. The duration of any vestment must at no time exceed the Sector duration limit

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Investec Lending List as at 31 March 2010 updated by IMBC as of 22 April 2010

Deposits and Certificates of Deposit   Fig.   Fig			S&P				Fit	ch				Cred	lit defaul	t swaps				g yes,		ong no		Fun	nd Rai	nge	
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Alled firsh Banks PLC	•				F-1+		AA-		В	1							_				Y	Y	Y	Y	Y
AAL   AA   AA   B   1   AA   B   AA   A					l																	-	-	_	Y
Ranco Bilbao Vizcaya Argentaria SA   A-1									,											,		N	N	N	N
Bank of America NTRSA																					Y	Y	Y	Y	Y
Rank of Ireland								+ve													Y	Y	Y	Y	Y
Bank of Montreal   A-1																					Y		Y	Y	N
Rank of New York									,		188.01	-17.35	-42.20	-395.62	-56.80					,	N	N	N	N	N
Bartle of Nova Scotia																	1				Y	Y	Y	Y	Y
Barclays Bank PLC   A-1									,								1				Y	Y	Y	Y	N
SNP Faribas   A-1											07.16	0.45	14.01	101.17	1.71						Y	Y	Y	Y	Y
Figure   First   Fir	,																_				Y	Y	Y	Y	Y
Commonwealth Bank of Australia   A-1								-ve													Y	Y	Y	Y	
Calyon Ca																					Y	Y	Y	Y	N
Calyon Credit Suisse First Boston Danske Bank A/S Danske Bank A/S Den Norske Bank A-1 A+ A+ B/C A-1 A+ B/C B-1 B-1+ AA- B/C B-1 B-1+ AA- B/C B-1 B-1+ AA- B/C B-1 B-1+ AA- B/C B-1 B-1+ B-1+ B-1 B-1 B-1+ B-1+ B-1+ B-																					Y	Y	Y	Y	N
Credit Suisse First Boston									,												Y	Y	Y	Y	Y
Danske Bank A/S	,																				Y	Y	Y	Y	
Den Norske Bank								-ve	,												Y	Y	Y	Y	IN N
Deutsche Bank AG Dexis Bank HSBC Bank plc ING Bank NV A-1	,								,		75.02	-1.12	-3.22	-138.43	0.27						Y	Y	Y	Y	N
A-1   A   A   B   1   A-1   AA   B   1   A-1   AA   B   1   B-1   AA   B   1   B-1   AA   B   1   B-1   AA   B   1   B-1   B											05.00	0.62	0.67	46.70	0.76						Y	Y	Y	Y	N
A-1								-ve	,		85.89	0.62	-8.67	-46.79	9.76						Y	v	V	Y	N
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Toronto-Dominion Bank UBS AG A-1+ AA- F-1+ AA- B 1									,		62.41	-0 19	-6.60	-80 63	4.94						Y	Y	Y	Y	Y
UBS AG A-1 A+ F-1+ A+ D 1 86.16 0.75 -16.03 -146.34 4.67 2 5 3 10 9m Y Y Y Y N												0.17	0.00	23.00	2.71						Y	Y	Y	Y	Y
											86.16	0.75	-16.03	-146.34	4.67						Y	Y	Y	Y	N
										1									7		Y	Y	Y	Y	Y

Subjective overlay



### Monthly Economic Summary

### General Economy

Bank of England left the bank rate at the record low of 0.5% and explained it would keep its asset buying programme unchanged at £200billion, as expected by the market. UK inflation data surprised to the upside in March. The Consumer Prices index accelerated to 3.4% y/y from 3.0% and the Retail Prices index rose to 4.4% y/y from 3.7%. The Cross Domestic Product for the first quarter of 2010 came in below forecast at 0.2%q/q, compared with an increase of 0.4% in the previous quarter. The decrease in the growth rate was due to weaker growth in services. Whilst the March claimant count rate fell to 4.8% from 4.9%, the fourth decline in the last five months. The broader ILO measure for February increased to it highest since September 1996. March retail sales rose a smaller than forecast 0.4% m/m and 2.2%y/y. Public finances figures showed a smaller than expected rise in FY 2009/10 public borrowing of £152.8bln, £13.2bln below the Treasury forecast. The manufacturing PMI rose to 57.3 last month, from 56.5 in February, and was ahead of analysts' forecasts. It was the best monthly growth figure since October 1994, as the Services' PMI also showed robust growth with a 50+ reading of 58.0 in March. The As the country sets up to go to the polls on May 6th, the Labour, Conservative and the Liberal Democrat parties, are scrambling to persuade voters that they are committed to curtailing the budget deficit, while securing the economic recovery. The UK is in an uncomfortable fiscal position as it faces a budget deficit of over 12% of its GDP. In April, the GfK consumer confidence index fell by 1 point to -16, suggesting that confidence in the recovery is beginning to stall.

### Housing Market

According to the Nationwide, property values grew by 1%m/m in April and 10.5%y/y, to an average of £167,802, reaching within 10% of their peak in October 2007. The Halifax house price index rose by 1.1%m/m and 5.2%y/y in March, resulting in the average price at £168,521.

### Jurrenc

The Euro endured a tormented trading month, due to the fears of the Greek debt problems. Sterling started the month at \$1.529 and reached a low of \$1.516 before ending the month at \$1.527. Sterling against the Euro ended at €1.156 having started at €1.126. The Euro started the month at \$1.350 against the dollar, before ending the month at £1.329.

### 400000

Sector believes that the Bank rate will remain at 0.5% for the rest of the year and expects the next upward move to be Q1 2011 and eventually reaching 4.50% in Q1 2013. UBS believe that the bank rate will start to increase in Q4 of 2010, reaching 2.25% by the end of 2011. Capital Economics have not changed their forecast and believe that rates will be held at 0.5% for up to five years, if things do not improve.

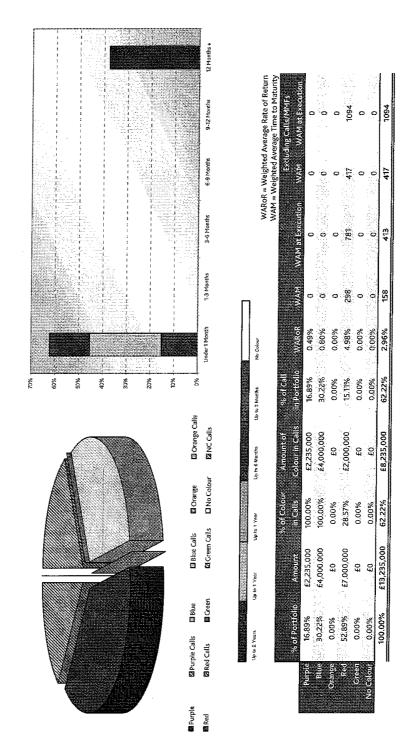
Vetail Middell	0.50% 1.00%	0.75% 1.00%	0.50% 0.50%
o stac	0.50%	0.50%	0.50%
	0.50%	0.50%	0.50%
	0.50%	0.50%	0.50%
	Qr.	S	conomics

### **Current Investment List**

Borrower	Illighal (2)	o He		
		0.80%	Alterdrich Berkeine voor 1800 Berkein bester der	
Bank Of Scotland	2,000,000	%08		l B
Natwest 2,000		3.80%		ਤੌ
10318/II		46%		MMF
Nationwide 2,500		6.25%		17/05/2011
Barclays 2,500		.05%	17/07/2008 16/0	16/07/2011
Borrower - Icelandic Exposure	Principal (£)	Stilleria	EX.	MARKE
LandsbanKi		5.86%		
Fotal livestments	£14,235,000 3.	,16%		
Total Investments - excluding Icelandic exposure	35,000	<b>%96</b>		
Total Investments - Icelandic Exposure Only	1,000,000	%98		

Tonbridge & Malling Borough Council

Portfolio Decomposition by Sector's Suggested Lending Criteria



### Monthly Credit Rating Changes FITCH

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	ividual ra	affirmed	ividual ra	ating do	lowngrac	ating do	Individu										
	1/7 and Individual ratings upgraded, other ratings affirmed. 1/7 placed on 'Stable Outlook'	All ratings affirmed with a Stable Outlook' following marger with Chelsea Bs	LT and individual ratings upgraded and withdrawn, other ratings withdrawn following market with North Pro-	Individual rating downstraded, support rating affirmed	S/T rating downeraded 1/T and S/T on 'Rating Watch Evoluing' support rating placed on 'Dasting Watch Evoluing'	Individual rating downgraded. I/T rating on Rating Watch Positive	الله الله الله الله الله الله الله الله										
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Country	Australia	¥η	ž	freland	freland	freland	ž			14 14 14 14 14							
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is E	Westpac Banking Corporation	Yorkshire Building Society	Chelsea Building Society	Irish Life & Permanent pic	Anglo Irish Bank Corporation	ciety	Newcastle Building Society										
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Update Number	730	732	732	733	734	734	735										
	22	010	9	710	010	)10	91					-					
Date	01/04/2010	07/04/2010	07/04/2010	07/04/2010	09/04/2010	09/04/2010	13/04/2010										

## Monthly Credit Rating Changes MOODY'S

ireland is Sp placed on 'review for possible upgrade, I/T rating on 'Stable Outlook' Ireland is Routlook Schanged's their Developing, I/T rating on 'Stable Outlook' Iveland is the ratings withdrawn to low and pure outlook of the ratings withdrawn to low in the region with Yor schine is St.  All of the ratings withdrawn to low in the previous is St.  All of the ratings withdrawn to low in the previous is St.  All of the ratings withdrawn to low in the previous is St.  All of the ratings withdrawn to low in the previous in	Update Number	Institution	J.	Country	Rating Action
Ireland Ireland UK	Bank of freland				FSR placed on freview for possible upgrade', L/T rating on 'Stabte Outlook'
OK OF	731 Allied frish Banks				FSR outlook changed to Positive Froim Developing, L.C. rating on Stable Outlook
<b>X</b>	EBS Building Society				FSR outlook changed to 'Positive' from 'Developing', L/T rating on 'Negative Outlook'
	-736 Chelsea Building Society	Ą			All of the ratings withdrawn following the merger with Yorkshire BS
		\$10 mm (\$10 mm)	5 - 30 - 10 - 100 to 10		

Monthly Credit Rating Changes S&P

23/04/2010   737   Intest Steppolo   Intest Steppolo   Intest Steppolo   Intest Steppolo   Intest Steppolo   Intest Steppolo   Interest Steppolo	Date	Update Number	Institution	Country	Retung Action	
737         Banca MI         Italy           738         Portugal. Sovereign Rating         Portugal           729         Gainor Sancheder Forts SA         Portugal           739         Banco Spirito Santo         Portugal           739         Banco BPI         Portugal           740         Spain Soviesien Rating         Spain           740         Spain Soviesien Rating         Spain	23/04/2010	737	Intesa Sanpaolo	Italy	UT and S/T ratinas downgraded 1/T placed on Seable Outlook	
739   Portugal Sovereign Rating   Portugal     739   Sando Garat de Popostos   Portugal     739   Sando Geral de Popostos   Portugal     739   Sando Santo   Portugal     739   Sanco Spirito Santo   Portugal     740   Spirito Santo   Portugal     740   Spirito Santo   Spirito Santo     740   Spirito Santo   Spirito Santo   Spirito Santo     740   Spirito Santo   Spirito Santo   Spirito Santo     740   Spirito Santo   Spirito Santo   Spirito Santo   Spirito Santo   Spirito Santo   Spirito Santo     740   Spirito Santo   Spirito   Spirito Santo   Spirito Santo   Spirito Santo   Spirito Santo   Spirito Santo   Spirito Santo   Spirito Santo Santo   Spirito Santo Sa	23/04/2010	737	Banca IM	Italy	Lift and Streamings downgraded. I'm placed on 'stable Outlook'	
739   Binnes Santeander Totio St.   Portugal   739   Caino derait de Depositos   Portugal   739   Binnes Sayato Santo   Portugal   739   Binnes Sayato Santo   Portugal   740   Spain Soviering Rating   Spain   Spain Soviering Rating   Spain   Portugal   Spain   Spain Sayato Rating   Spain   S	27/04/2010	738	Portugal Sovereign Rating	Portugal	Sovereign rating downgraded with a Nacative Outlook	1
739   Cuiva Genal de Depoetros   Portugal     739   Bainco Significo Santo.   Portugal     740   Spain Sovereign Rating   Portugal     740   Spain Sovereign Rating   Spain     740   Spain Sovereign Rating R	28/04/2010	739	Banco Santander Totta SA	Portugal	L/Tand S/Tatings/downeraded L/T placed on Negative Outbook	
739 Banco Santo 740 Spain Sovereign Rating  740 Spain Sovereign Rating	28/04/2010	739	Caixa Geral de Depositos	Portugaí	L/T and S/T ratings downgraded, L/T placed on 'Nepative Outhook'	
740 Spain Sovereign Rating Portugal	28/04/2010	739	Banco Espirito Santo	Portugal	UT and S/T retings downeraged L/T blaced on 'Negative Outlook'	
740 Spain Sovieting Rating	28/04/2010	739	Banco 3P1	Portugal	L/T and S/T ratings downgraded, I/T placed on 'Negative Outlook'	
	28/04/2010	740	Spain Sowereign Rating	Spain	Sovereign rating downgraded with a Negative Outhook	
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