

Pension Fund Committee

Dorset County Council



Date of Meeting	1 March 2016
Officer	Pension Fund Administrator
Subject of Report	Treasury Management Strategy
Executive Summary	<p>The Pension Fund at any one time holds a level of cash balances that are generated from the positive cash-flows from member contributions, investment income less payments to members in the form of pensions.</p> <p>Periodically this surplus cash is distributed in line with the Funding Strategy Statement. In 2008 a number of public sector bodies had monies frozen when the Icelandic Banks collapsed and since then the rules and regulations have been tightened to provide better security of cash balances.</p> <p>The Dorset County Pension Fund seeks to ensure the security and liquidity of its cash resources prior to their allocation and previously agreed a new Treasury Management Strategy in March 2015. The strategy set limits on the amount and length of time that cash can be invested with specific counterparties, to a maximum of two years. This is to reflect the fact that there is not a strategic allocation to cash and investing cash sums for more than this period would be contrary to the Fund's investment strategy. In relation to counterparty risks and limits, this strategy continues to be consistent with that of the County Council, including the removal of support ratings as a means of assessing the financial strength of counterparties, as agreed at the November meeting of the committee.</p>
Impact Assessment: <i>How have the</i>	Equalities Impact Assessment: N/A

<p><i>following contributed to the development of this report?*</i></p>	<p>Use of Evidence: The use of evidence and information sources to support the Treasury Management Strategy is set out in detail in the main body of this report.</p>
	<p>Budget/ Risk Assessment: None</p>
<p>Recommendation</p>	<p>That the Committee agrees to continue with the current Treasury Management Strategy.</p>
<p>Reason for Recommendation</p>	<p>To ensure that the Dorset County Pension Fund invests its surplus cash-flows appropriately prior to allocation to fund managers.</p>
<p>Appendices</p>	<p>Appendix 1 – Treasury Management Practice 1 – Credit and Counterparty Risk Management Appendix 2 – Summary of Investment Criteria Appendix 3 – Current Counterparties</p>
<p>Background Papers</p>	<ul style="list-style-type: none"> • Dorset County Council – Investments and Creditworthiness Policy
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Dorset County Pension Fund- Treasury Management Strategy and Investment Policy

1. Introduction

- 1.1 The investment policy of Dorset County Pension Fund [the “Fund”] closely follows that of Dorset County Council, who administer the Fund and has regard to the CLG’s Guidance on Local Government Investments (“the Guidance”) and the revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes (“the CIPFA TM Code”). The Fund’s cash investment priorities will be security first, liquidity second, then return, so that cash resources are safeguarded prior to distribution in line with the Fund’s Investment Strategy.
- 1.2 In accordance with the above guidance from the CLG and CIPFA, and in order to minimise the risk to investments, the Fund has clearly stipulated the minimum acceptable credit quality of counterparties for inclusion on the approved lending list. The creditworthiness methodology used to create the counterparty list fully accounts for the ratings, watches and outlooks published by all three ratings agencies. Using the ratings service, provided by Capita Asset Services, the Council’s Treasury Management Advisers, potential counterparty ratings are monitored on a real time basis with knowledge of any changes notified electronically as the agencies notify modifications.

2. Changes to credit rating methodology

- 2.1 The main rating agencies (Fitch, Moody’s and Standard & Poor’s) have, through much of the financial crisis, provided some institutions with a ratings “uplift” due to implied levels of sovereign support. Commencing in 2015, in response to the evolving regulatory regime, all three agencies have begun removing these “uplifts” with the timing of the process determined by regulatory progress at the national level. The process has been part of a wider reassessment of methodologies by each of the rating agencies. In addition to the removal of implied support, new methodologies are now taking into account additional factors, such as regulatory capital levels. In some cases, these factors have “netted” each other off, to leave underlying ratings either unchanged or little changed. A consequence of these new methodologies is that they have also lowered the importance of the (Fitch) Support and Viability ratings and have seen the (Moody’s) Financial Strength rating withdrawn by the agency.
- 2.2 In keeping with the agencies’ new methodologies, the rating element of our own credit assessment process now focuses solely on the Short and Long Term ratings of an institution. While this is the same process that has always been used for Standard & Poor’s, this has been a change in the use of Fitch and Moody’s ratings. It is important to stress that the other key elements to our process, namely the assessment of Rating Watch and Outlook information as well as the Credit Default Swap (CDS) overlay have not been changed.
- 2.3 The evolving regulatory environment, in tandem with the rating agencies’ new methodologies also means that sovereign ratings are now of lesser importance in the assessment process. Where through the crisis, clients typically assigned the highest sovereign rating to their criteria, the new regulatory environment is attempting to break the link between sovereign support and domestic financial institutions. While this authority understands the changes that have taken place, it will continue to specify a minimum sovereign rating of AAA. This is in relation to the fact that the underlying domestic and where appropriate, international, economic

and wider political and social background will still have an influence on the ratings of a financial institution.

- 2.4 It is important to stress that these rating agency changes do not reflect any changes in the underlying status or credit quality of the institution. They are merely reflective of a reassessment of rating agency methodologies in light of enacted and future expected changes to the regulatory environment in which financial institutions operate. While some banks have received lower credit ratings as a result of these changes, this does not mean that they are suddenly less credit worthy than they were formerly. Rather, in the majority of cases, this mainly reflects the fact that implied sovereign government support has effectively been withdrawn from banks. They are now expected to have sufficiently strong balance sheets to be able to withstand foreseeable adverse financial circumstances without government support. In fact, in many cases, the balance sheets of banks are now much more robust than they were before the 2008 financial crisis when they had higher ratings than now. However, this is not universally applicable, leaving some entities with modestly lower ratings than they had through much of the “support” phase of the financial crisis.

3. Investment Policy

- 3.1 The Fund’s cash investments policy has regard to the CLG’s Guidance on Local Government Investments (“the Guidance”) and the revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes (“the CIPFA TM Code”). The Fund’s cash investments priorities will be security first, liquidity second, then return.
- 3.2 In accordance with the above guidance from the CLG and CIPFA, and in order to minimise the risk to investments, the Fund applies minimum acceptable credit criteria in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the Short Term and Long Term ratings.
- 3.3 Ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To this end the Fund will engage with its Treasury Management advisers, Capita Asset Services, to maintain a monitor on market pricing such as “credit default swaps” and overlay that information on top of the credit ratings.
- 3.4 Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
- 3.5 Investment instruments identified for use in the financial year are listed in Annex A of this Policy under the ‘specified’ and ‘non-specified’ investments categories. Counterparty limits will be as set through the Fund’s treasury management practices schedules.

4. Creditworthiness Policy

- 4.1 The primary principle governing the Fund’s cash investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the Fund will ensure that:

- It maintains this policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate security, and monitoring their security. This is set out in Appendix 1; and
 - It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed.
- 4.2 Risk of default by an individual borrower is minimised by placing limits on the amount to be lent. These limits use, where appropriate, credit ratings from Fitch, Standard and Poors, and Moodys Credit Rating Agencies. All banks and building societies used by the Fund will have a long-term rating of at least A- and a minimum short term rating of F1. Long-term ratings vary from AAA (the highest) down to D the lowest. Short-term ratings vary from F1+ (the highest) down to D. Individual ratings vary from A (the highest) down to E, and these are now being replaced by viability ratings (aaa the highest, to c the lowest) and estimate how likely the bank is to need assistance from third parties. Local authorities are not generally rated. The limits to be used are set out in paragraph 4.5.
- 4.3 The Pension Fund Administrator will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to the Pension Fund Committee for approval as necessary. These criteria are separate to that which determines which type of investment instrument are either Specified and Non-Specified investments as it provides an overall pool of counterparties considered to be high quality that the Fund may use, rather than defining what types of cash investment instruments are to be used.
- 4.4 Credit rating information is supplied by the Fund's treasury management advisers on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating Watches (notification of a likely change), rating Outlooks (notification of a possible longer term change) are provided almost immediately after they occur and this information is considered before dealing. For instance, a negative rating Watch applying to a counterparty at the minimum Fund criteria will be suspended from use, with all others being reviewed in light of market conditions.

Security

- 4.5 The criteria for providing a pool of high quality investment counterparties (both Specified and Non-specified investments) are:
- i. Sovereign Ratings**
- 4.5.1 The Fund will only lend to counterparties in countries with the highest sovereign Credit Rating of AAA. The maximum that can be deposited with banks in any one sovereign is £30m at any time. The exception to both rules is the United Kingdom.
- ii. Counterparties with Good Credit Quality**
- 4.5.2 The Fund will lend to counterparties with the following counterparty ratings:

Table 1 Counterparty Ratings

Category	Minimum Credit Rating	Limit
Any Local Authority	n/a	£15 Million
Banks & Building Societies	Short F1, Long A-	£15 Million
Money Market Funds	AAA	£15 Million (individual)
Money Market Funds Notice Account	AAA	£10 Million (individual)
UK Government including gilts and the Debt Management Account Deposit Facility (DMADF)	n/a	no limit

4.5.3 Where a counterparty is part of a larger group, it is appropriate to limit the Fund's overall exposure to the group. Individual counterparties within the group will have their own limit, but will be subject to an overall limit for the group. The limit for any one group will be £15m, except in the case of the four major UK banking groups where the limit would be £30m.

iii. Part Nationalised Banking Groups

4.5.4 The Fund will continue to use banking groups whose ratings fall below the criteria specified above if that banking group remains part nationalised, up to a limit of £30m for the group.

iv. Fund's own banker

4.5.5 The limit for the Fund's own bank is £30m, however, due to occasional short term unexpected cashflows this limit may be breached. For this reason additional flexibility of an additional £1m is allowed to cover such movements, and to minimise the transaction costs involved with moving small sums of money. Over the long term the £30m should be the maximum. The breaches of the £30m limit will be monitored and reported to the Fund Administrator on a monthly basis.

4.5.6 If the Fund's own banker, NatWest, fell below the Fund's criteria it would continue to be used for transactional and clearing purposes with the maximum balances deposited with them overnight being limited to £500k.

v. Major UK Banks

4.5.7 The Fund may invest up to £30m with each of the four major UK banking groups, Barclays Bank PLC, HSBC Bank PLC, Lloyds Banking Group PLC, and The Royal Bank of Scotland PLC (which owns the Fund's bank, National Westminster Bank PLC), taking into account the restrictions of group limits and any other limits which apply. These four banking groups were added explicitly to the Treasury Management Strategy with the rationale that in a worst case scenario, all of the Fund's cash could be placed across these four banks.

vi. Use of Additional Information other than Credit Ratings

4.5.8 Additional requirements under the Code of Practice now require the County Council (and therefore the Fund) to supplement credit rating information. Whilst the above criteria relies primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market

information will be applied before making any specific investment decision from the agreed pool of counterparties. This additional market information (for example Credit Default Swaps, negative rating Watches / Outlooks) will be applied to compare the relative security of differing investment counterparties.

Liquidity

4.6 Liquidity is defined as an organisation “having adequate, though not excessive cash resources, borrowing arrangements, overdrafts or standby facilities to enable it at all times to have the level of funds available to it which are necessary for the achievement of its business/service objectives” (CIPFA Treasury Management Code of Practice).

4.7 In addition it is prudent to have rules for the balance of cash investments between short term and longer term deposits to maintain adequate liquidity. They are:

i. Fixed Term Investments

A minimum cash balance of £10M must be maintained in call accounts or instant access Money Market Funds. Any amount above this can be invested in fixed term deposits.

ii. Call Deposits

The amount of call deposits (instant access accounts) should be a minimum of £10m to allow for any unforeseen expenditures, up to a maximum of 100%. From time to time, it may be necessary for call deposits to fall below £10M, when this occurs it should be for no more than one working day. The breaches of the £10M limit will be monitored and reported to the Fund Administrator on a monthly basis.

iii. Time and Monetary limits applying to Investments

The time and monetary limits for institutions on the Fund’s Counterparty List are as follows (these will cover both Specified and Non-Specified Investments):

Table 3 – Time and Monetary Limits

	Minimum Long Term and Short Term Counterparty Rating (LCD Approach)	Money Limit	Time Limit
Any Local Authority	n/a	£15 Million	2 Years
Banks & Building Societies	AA- / F1+	£15 Million	2 Years
Banks & Building Societies	A - / F1	£15 Million	364 Days
Major UK Banks*	n/a	£30 Million	2 Years
Money Market Funds	AAA	£15 Million (individual)	Overnight
Money Market Funds	AAA	£10 Million (individual)	7 Day Notice
UK Government including gilts and the DMADF	n/a	Unlimited	6 Months
Part Nationalised Banking Groups**	n/a	£30 Million	2 Years
Fund’s Own Banker	n/a	£30 Million	2 Years

*Barclays Bank PLC, HSBC Bank PLC, Lloyds Banking Group PLC and The Royal Bank of Scotland PLC.

** Lloyds Banking Group PLC and The Royal Bank of Scotland PLC.

iv. Longer Term Instruments

The use of longer term instruments (greater than one year from inception to repayment) will fall in the Non-Specified investment category. These instruments will only be used where the Fund's liquidity requirements are safeguarded. This will be limited to counterparties rated AA- long term, and F1+ short term. The level of overall investments should influence how long cash can be invested for. For this reason it has been necessary to introduce a sliding scale of limits that depend on the overall size of cash balances. The smaller the size of the overall cash balances the more important it is that the money is kept liquid to meet the day to day cashflows of the organisation. Likewise if cash balances are large, a greater proportion of the funds can be invested for longer time periods. Table 4 sets out the investment limits.

Table 4 Time Limits for Investments over 365 days

Time Limit	Money Limit invested with Counterparties rated AA- - F1 + and above	
Projected Annual Balances	%	
More than 1 year, no more than 2 years	100%	£15M

- 4.8 In the normal course of the Fund's cash flow operations it is expected that both Specified and Non-Specified investments will be utilised for the control of liquidity as both categories allow for short term investments.
- 4.9 A summary of the proposed criteria for investments is shown in Appendix 2, and a list of counterparties as at 11 January 2016 in accordance with these criteria is shown as Appendix 3 to this policy for information.

Investment Policy - Treasury Management Practice 1

Treasury Management Practice (TMP) 1 – Credit and Counterparty Risk Management

The CLG issued Investment Guidance on April 2010, and this forms the structure of the Fund's policy below. The CLG is currently consulting over revisions to the Guidance and where applicable the Consultation recommendations have been included within this policy. These guidelines do not apply to either trust funds or pension funds which are under a different regulatory regime.

The key intention of the Guidance is to maintain the current requirement for Councils to invest prudently, and that priority is given to security and liquidity before yield. In order to facilitate this objective the guidance requires this Council to have regard to the CIPFA publication Treasury Management in the Public Services: Code of Practice and Cross-Sector Guidance Notes. This Fund adopted the Code, through the Administering Authority during 2002 and will apply its principles to all investment activity. In accordance with the Code, the Fund Administrator has produced the Fund's treasury management practices (TMPs). This part, TMP 1(5), covering investment counterparty policy, requires approval each year.

Annual Investment Strategy

The key requirements of both the Code and the investment guidance are to set an annual investment strategy, as part of its annual treasury strategy for the following year, covering the identification and approval of following:

- The strategy guidelines for choosing and placing investments, particularly non-specified investments.
- The principles to be used to determine the maximum periods for which funds can be committed.
- Specified investments the Fund will use. These are high security (i.e. high credit rating, although this is defined by the Fund, and no guidelines are given), and high liquidity investments in sterling and with a maturity of no more than a year.
- Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

The investment policy proposed for the Fund is set out below.

Strategy Guidelines

The main strategy guidelines are contained in the body of the treasury strategy statement (the Investment Strategy).

Specified Investments

These investments are sterling investments of not more than one-year maturity, or those which could be for a longer period but where the Fund has the right to be repaid within 12 months if it wishes. These are considered low risk assets where the possibility of loss of principal or investment income is small. These would include sterling investments which would not be defined as capital expenditure with:

1. The UK Government (such as the Debt Management Office, UK Treasury Bills or gilt with less than one year to maturity).

2. Supranational bonds of less than one year's duration.
3. A local authority, parish council or community council
4. Pooled investment vehicles (such as money market funds) that have been awarded a high credit rating by a credit rating agency.
5. A body that is considered of a high credit quality (such as a bank or building society). This covers bodies with a minimum short term rating of F1 (or the equivalent) as rated by Standard and Poor's, Moody's or Fitch rating agencies. Within these bodies, and in accordance with the Code, the Fund has set additional criteria to set the time and amount of monies which will be invested in these bodies.

Non-Specified Investments

Non-specified investments are any other type of investment (i.e. not defined as specified above). This would include investments greater than 1 year in duration. It is proposed that counterparties will be restricted to those in the specified category above when investing for more than a year. In total these longer term loans will be limited to £30m of the total investment portfolio and this has been determined with regard to the forecasts of future cash flow.

The Monitoring of Investment Counterparties

The credit rating of counterparties will be monitored regularly. The Fund receives credit rating information (changes, rating watches and rating outlooks) from Capita Asset Services as and when ratings change, and counterparties are checked promptly. On occasion ratings may be downgraded when an investment has already been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately by the Fund Administrator, and if required new counterparties which meet the criteria will be added to the list.

Summary of Investment Criteria

APPENDIX 2

Paragraph	Criteria	Minimum Rating		Maximum Investment and Exceptions
		Long	Short	
Sovereign Limit for All Loans				
4.5.1	AAA Sovereign Rating	n/a	n/a	£30 Million with any one sovereign, UK no limits
Notice Money				
A minimum of 10% of total investments, up to a maximum of 100%				
4.5.5	Council's own Banker	n/a	n/a	£30 Million
4.5.2	Money Market Funds	AAA		£15 Million individual
4.5.2	Money Market Fund Notice Account	AAA	n/a	£10 Million individual
Fixed Term Investments				
Limited to the amount of excess balances for that term less a margin of £10 Million				
Up to 6 months				
4.5.2	UK Government including gilts and DMADF			Unlimited
Up to 364 Days				
4.5.2	Any Local Authority			£15 Million
4.5.2	Banks & Building Societies	A-	F1	£15 Million Note that no more than £15 Million can be invested with banks in the same group where the highest rated counterparty has a minimum of these ratings See 4.5.4, 4.5.5, 4.5.6, 4.5.7 for exceptions
4.5.7	Four Major UK Banking Groups: Barclays Bank PLC, HSBC Bank PLC, Lloyds Banking Group PLC, The Royal Bank of Scotland PLC (including National Westminster Bank PLC)	N/a	N/a	£30 Million
Up to 2 years				
4.5.2	Major Banks & Building Societies	AA-	F1+	£15 Million per bank Note that no more than £15 Million can be invested with banks in the same group where the highest rated counterparty has a minimum of these ratings See 4.5.4, 4.5.5, 4.5.6, 4.5.7 for exceptions
4.5.4	Part Nationalised Banking Groups: Lloyds Banking Group PLC, The Royal Bank of Scotland PLC (including National Westminster Bank PLC)	n/a	n/a	£30 Million

APPENDIX 3

Counterparty list as at 11 January 2016

	Lowest Long Term Rating*	Lowest Short Term Rating*	Money Limit (£M)	Time Limit
UK Banks and Building Societies				
HSBC Bank PLC	AA-	F1+	£30M	2 YEARS
<i>Lloyds Banking Group:</i>				
Bank of Scotland PLC	A+	F1	£30M (group)	2 YEARS
Lloyds Bank PLC	A+	F1	£30M (group)	2 YEARS
<i>Royal Bank of Scotland Group:</i>				
National Westminster Bank	BBB+	F2	£30M (group)	2 YEARS
Royal Bank of Scotland	BBB+	F2	£30M (group)	2 YEARS
Barclays Bank	A	F1	£30M	2 YEARS
Santander UK Plc	A	F1	£15M	364 DAYS
Standard Chartered Bank	A+	F1	£15M	364 DAYS
Nationwide Building Society	A	F1	£15M	364 DAYS
Goldman Sachs International Bank	A	F1	£15M	364 DAYS
Close Brothers Ltd	A	F1	£15M	364 DAYS
Sumitomo Mitsui Banking Corporation Europe Limited	A	F1	£15M	364 DAYS
Coventry Building Society	A	F1	£15M	364 DAYS
Leeds Building Society	A-	F1	£15M	364 DAYS
UBS Ltd	A	F1	£15M	364 DAYS
Abbey National Treasury Services	A	F1	£15M	364 DAYS
Australian Banks				
National Australia Bank Limited	AA-	F1+	£15M	2 YEARS
Australia and New Zealand Banking Group	AA-	F1+	£15M	2 YEARS
Commonwealth Bank of Australia	AA-	F1+	£15M	2 YEARS

	Lowest Long Term Rating*	Lowest Short Term Rating*	Money Limit (£M)	Time Limit
Macquarie Bank Limited	A	F1	£15M	364 DAYS
Westpac Banking Corporation	AA-	F1+	£15M	2 YEARS
Canadian Banks				
Canadian Imperial Bank of Commerce	AA-	F1+	£15M	364 DAYS
Bank of Montreal	AA-	F1+	£15M	364 DAYS
Bank of Nova Scotia	AA-	F1+	£15M	364 DAYS
National Bank of Canada	A+	F1	£15M	364 DAYS
Royal Bank of Canada	AA	F1+	£15M	2 YEARS
Toronto-Dominion Bank	AA-	F1+	£15M	2 YEARS
Danish Banks				
Danske A/S	A	F1	£15M	364 DAYS
German Banks				
Landwirtschaftliche Rentenbank	AAA	F1+	£15M	2 YEARS
DZ Bank AG (Deutsche Zentral-Genossenschaftsbank)	AA-	F1+	£15M	2 YEARS
Landesbank Hessen-Thuringen Girozentrale	A+	F1+	£15M	364 DAYS
Landesbank Baden-Wurtemberg	A-	F1	£15M	364 DAYS
NRW Bank	AAA	F1+	£15M	2 YEARS
Luxembourg Banks				
European Investment Bank	AAA	F1+	£15M	2 YEARS
Singaporean Banks				
DBS Bank Ltd.	AA-	F1+	£15M	2 YEARS
Overseas-Chinese Banking Corp	AA-	F1+	£15M	2 YEARS
United Overseas Bank Limited	AA-	F1+	£15M	2 YEARS
Swedish Banks				
Nordea Bank AB	AA-	F1+	£15M	2 YEARS
Svenska Handelsbanken	AA-	F1+	£15M	2 YEARS

	Lowest Long Term Rating*	Lowest Short Term Rating*	Money Limit (£M)	Time Limit
Swedbank AB	A+	F1	£15M	364 DAYS
Skandinaviska Enskilda Banken AB	A+	F1	£15M	364 DAYS
Swiss Banks				
UBS AG	A	F1	£15M	364 DAYS
Credit Suisse AG	A	F1	£15M	364 DAYS

	Lowest Long Term Rating*	Lowest Short Term Rating*	Money Limit (£m)	Time Limit
Canadian Banks				
Canadian Imperial Bank of Commerce	A+	F1	15	364 DAYS
Bank of Montreal	A+	F1	15	364 DAYS
Bank of Nova Scotia	A+	F1	15	364 DAYS
National Bank of Canada	A	F1	15	364 DAYS
Royal Bank of Canada	AA-	F1+	15	2 YEARS
Toronto-Dominion Bank	AA-	F1+	15	2 YEARS
National Bank of Canada	A	F1	15	364 DAYS
German Banks				
Landwirtschaftliche Rentenbank	AAA	F1+	15	2 YEARS
DZ Bank AG (Deutsche Zentral-Genossenschaftsbank)	A+	F1+	15	364 DAYS
KfW	AAA	F1+	15	2 YEARS
Landesbank Hessen-Thuringen Girozentrale	A	F1	15	364 DAYS
Landesbank Baden-Wuerttemberg	A	F1+	15	364 DAYS
Sparkassen-Finanzgruppe	A+	F1+	15	364 DAYS
Luxembourg Banks				
BGL BNP Paribas SA	A	F1	15	364 DAYS
Banque et Caisse d'Epargne de l'Etat	AA+	F1+	15	2 YEARS
Clearstream Banking	AA	F1+	15	2 YEARS
Singaporean Banks				
DBS Bank Ltd.	AA-	F1+	15	2 YEARS
Oversea-Chinese Banking Corp	AA-	F1+	15	2 YEARS
United Overseas Bank Limited	AA-	F1+	15	2 YEARS
Swedish Banks				
Svenska Handelsbanken	AA-	F1+	15	2 YEARS
Swedbank AB	A+	F1	15	364 DAYS
Skandinaviska Enskilda Banken	A+	F1	15	364 DAYS

	Lowest Long Term Rating*	Lowest Short Term Rating*	Money Limit (£m)	Time Limit
Swiss Banks				
UBS AG	A	F1	15	364 DAYS
Credit Suisse AG	A	F1	15	364 DAYS

**Fitch equivalent ratings have been used for comparative purposes.*