

Date: 12 March 2014

Item 9: Treasury Management Strategy 2014/15 – Part 1

This paper will be considered in public

1. Summary

- 1.1 The purpose of this paper is to ask the Committee to recommend that the Board approve the proposed TfL Treasury Management Strategy (TMS) for 2014/15. The TMS 2014/15 comprises the Investment Strategy 2014/15, the Borrowing Strategy 2014/15, the Risk Management Strategy 2014/15 and TfL Policy on Minimum Revenue Provision.
- 1.2 The Committee is also asked to approve the establishment of a new Revolving Credit Facility.
- 1.3 A paper is included on Part 2 of the agenda, which contains exempt supplemental information and documentation. The information is exempt by virtue of paragraph 3 of Schedule 12A of the Local Government Act 1972 in that it contains information relating to the financial affairs of TfL. Any discussion of that exempt information must take place after the press and public have been excluded from this meeting.

2. Recommendations

2.1 That the Committee:

- (a) note the paper;
- (b) recommend that the Board approve the Treasury Management Strategy for 2014/15, including the Investment Strategy 2014/15, the Borrowing Strategy 2014/15, the Risk Management Strategy 2014/15 and the TfL Policy on Minimum Revenue Provision included as Appendix 1;
- (c) approve the proposed Approved Investment List as set out in Appendix 1 to Part 2 of this paper and the Counterparty Credit Exposure Limits contained in Part 2 of this paper;
- (d) recommend that, in relation to the implementation of permitted borrowing in relation to the Euro Medium Term Note (EMTN) Programme, the Euro Commercial Paper (ECP) Programme or any notes issued under standalone documentation (as described on the paper on Part 2 of the agenda), the Board delegates the approval and entry into of any required agreements or other documentation

including any associated Prospectus or Information Memorandum to Officers under the TMS and that General Counsel be authorised to make the necessary changes to the Finance and Policy Committee Terms of Reference in Transport for London's Standing Orders accordingly;

- (e) approve the entry by TfL into a Revolving Credit Facility, up to the value proposed in the paper on Part 2 of the agenda, and delegate authority to the TfL Officers (as described in 2.2 below) to agree the detailed terms of and establish such a facility should they believe it prudent to do so;
- (f) delegate authority to the TfL Officers to approve, sign, execute (by deed or otherwise) and deliver on behalf of TfL any and all ancillary documentation to be entered into by TfL in relation to the Revolving Credit Facility; and
- (g) approve the Proposed New Approved Derivatives Counterparties List is set out in Part 2 of this paper.

2.2 The following Officers and Subsidiaries shall have delegated authority:

- (a) **TfL Officers:** the Commissioner, Managing Director Finance, Chief Finance Officer, General Counsel and Director of Group Treasury; and
- (b) **Subsidiaries:** Subsidiaries of TfL including Transport Trading Limited and any other subsidiary (whether existing presently or to be formed) of Transport Trading Limited and any of the directors of the relevant company shall be authorised to act for and on behalf of that company.

3. Proposed changes to Treasury Management Strategy

- 3.1 It is proposed that the TMS 2014/15 should follow closely the form and structure of the TMS 2013/14. Within that form and structure, various changes are proposed and these proposals are described and explained in the sections that follow. All of the proposed changes compared to the TMS 2013/14 are shown with changes tracked in Appendix 2.

4. Investment Strategy

- 4.1 The Investment Strategy 2013/14 set out TfL's investment framework of approved investment types and counterparties. This paper expands on this framework through the addition of greater investment counterparty diversity and a refinement of credit risk controls.
- 4.2 TfL's Investment Strategy reflects the relevant guidance issued by the Department for Communities and Local Government (DCLG). There have been no material changes to this guidance since the previous paper.

Therefore, there are no proposed amendments to the Investment Strategy 2013/14 in this regard.

- 4.3 Proposed changes to the Investment Strategy compared to the previous year are discussed on the paper in Part 2 of the agenda.

5. Borrowing Strategy

- 5.1 In 2014/15 TfL has £650m of incremental Prudential Borrowing to undertake. This represents the additional borrowing agreed with the Government as part of the 2010 Funding Settlement. The scheduled drawdown on 2 April of a tranche of the £1bn European Investment Bank (EIB) loan in support of Crossrail will account for £100m of this borrowing.
- 5.2 TfL's power to borrow is subject to the requirements of the local government capital finance regime. TfL adopts Prudential Indicators for treasury management activities, including establishing an Operational Boundary and Authorised Limit in respect of TfL's Prudential Borrowing. The proposed Prudential Indicators for 2014/15 and the following two years are the subject of a separate item on the agenda.
- 5.3 TfL's borrowing strategy for 2014/15 is largely unchanged from 2013/14. TfL's objective remains to manage its borrowing in a manner that combines flexibility, security of access to funds, diversity of funding sources and value for money. TfL seeks to achieve this by maintaining access to capital markets through its Euro Commercial Paper (ECP) programme and Euro Medium Term Note (EMTN) programme, and complementing this with loans and other facilities from banks where appropriate, as well as strengthening and broadening its investor base.
- 5.4 Further detail on the proposed Borrowing Strategy including changes compared to the previous year, are discussed on the paper in Part 2 of the agenda.

Proposed Changes to the Borrowing Strategy

- 5.5 This section describes the changes proposed to the Borrowing Strategy 2014/15 compared to 2013/14.

Borrowing Documentation

- 5.6 Pursuant to Board approved Terms of Reference of the Committee, the Board has delegated to the Committee the implementation of any borrowing permitted by the annual Treasury Management Strategy or Treasury Management Policy Statement (or any other Board approved borrowing or investment strategy) including any associated Prospectus or Information Memorandum.
- 5.7 It is proposed that the Committee recommend to the Board that in relation to such implementation of permitted borrowing in relation to the EMTN Programme or ECP Programme or any notes issued under standalone

documentation (as described in the paper on Part 2 of the agenda) the approval and entry into of any required agreements or other documentation including any associated Prospectus or Information Memorandum be delegated directly to Officers under the TMS.

- 5.8 The reason for seeking this delegation is, having had a number of years experience of issuance, it is timely to bring the delegations for this administrative requirement in line with other Treasury related documentation. This would provide greater flexibility for TfL to manage the administration of its capital markets borrowing programmes.
- 5.9 The Committee is asked to consider the new proposed provision in the TMS that in relation to the implementation of permitted borrowing in relation to the EMTN Programme, the ECP Programme or any notes issued under standalone documentation only that the Board delegate responsibility for the approval (and entry into) of any required agreements or other documentation, including any associated Prospectus or Information Memorandum, directly to Officers under the TMS should it wish to do so. The Committee is asked to recommend to the Board that the Terms of Reference of the Committee within TfL's Standing Orders are updated to reflect this change and that General Counsel be authorised to make the necessary changes.
- 5.10 For further reference purposes and to remind Members of the overall position, a copy of an updated memoranda, prepared by TfL's external legal advisors, outlining the liability of any Issuer in respect of a Prospectus and an Information Memorandum, is attached at Appendix 3 of the paper included on Part 2 of the agenda.

Other Proposed Changes to the Borrowing Strategy

- 5.11 An addition has been made at Paragraph 6.2 to record TfL's intention to maintain a strong investment grade credit rating.
- 5.12 Other minor drafting changes have been made and are tracked in the draft document.

6. Revolving Credit Facility

- 6.1 Under both the existing and proposed Treasury Management Strategies Committee's approval is required for any newly arranged facility (but not facilities being renewed) through the EIB or commercial banks.
- 6.2 On 15 September 2011, the Committee approved the establishment of a Commercial Paper Backstop Facility (CPBF). The purpose of a CPBF is to provide a fall back in the event that TfL is unable to issue Commercial Paper. While that approval is still in effect, to date a CPBF has not been established as Officers have not felt it necessary to do so.
- 6.3 Notwithstanding the existing approval and approval to establish and use a CPBF, it is also proposed that the Committee should approve the establishment of a general purpose Revolving Credit Facility (RCF) and

delegate to the TfL Officers listed in paragraph 2.2 the authority to put such a facility in place should they believe it prudent to do so.

- 6.4 An RCF is more flexible than a CPBF as the banks providing such a facility will expect that it may be drawn and repaid several times in the ordinary course of business rather than as a last resort when a borrower is unable to issue commercial paper.
- 6.5 It is proposed that the final terms of any RCF that is entered into by TfL would be reported back to the Committee as part of the semi-annual or annual update on Group Treasury Activities as appropriate.
- 6.6 Further information on the proposed value and other details of the RCF is set out in the paper on Part 2 of the agenda.

7. Minimum Revenue Provision Statement

- 7.1 The Minimum Revenue Provision (MRP) is a statutory requirement that requires local authorities to set aside an amount from current revenue resources in relation to future debt repayment. The MRP policy has to be approved by the Board each year.
- 7.2 TfL has a duty to determine for the current financial year an amount of minimum revenue provision which it considers to be prudent in relation to debt service obligations.
- 7.3 It is proposed that TfL's policy on MRP remains unchanged, that is to treat debt service (interest and principal) in its Business Plan as an in-year operating cost. As TfL has a legal requirement to produce a balanced budget (and this approach had been extended to the full Business Plan), the cost of debt service is taken into account when determining whether annual budget and business forecasts are in balance.

8. Risk Management Strategy

- 8.1 No significant changes are proposed in the Risk Management Strategy 2014/15 compared to the previous year 2013/14.
- 8.2 It is a high level strategy and TfL will seek approval from the Committee or authorised delegates to exercise its powers under Section 49 of the Transport for London Act 2008 to use derivatives for the purposes of managing specific financial risks during the course of the year.
- 8.3 The details of proposed hedging programmes and changes to TfL's approved derivative counterparties list is the subject of separate papers to the Committee.

List of appendices to this report:

Appendix 1: Treasury Management Strategy 2014/15

Appendix 2: Treasury Management Strategy 2014/15 with changes compared to 2013/14 tracked

Appendix 3: Approved Investments List 2013/14

Appendix 4: Approved Derivatives Counterparties 2013/14

List of Background Papers:

None

Contact Officer: Simon Kilonback, Director of Group Treasury

Number: 020 7535 5300

Email: SimonKilonback@tfl.gov.uk

TRANSPORT FOR LONDON

TREASURY MANAGEMENT STRATEGY 2014/15

1 SUMMARY

1.1 This TfL Treasury Management Strategy (TMS) 2014/15 comprises the:

- (a) Investment Strategy 2014/15;
- (b) Borrowing Strategy 2014/15; and,
- (c) Risk Management Strategy 2014/15.

2 BACKGROUND INFORMATION

- 2.1 TfL has had regard to the key recommendations of CIPFA's Code of Practice and Cross-Sectoral Guidance Notes for Treasury Management in the Public Services 2011 (the 'Code') and the revised investment guidance issued by the Department for Communities and Local Government (DCLG) which came into effect from 1 April 2010 (DCLG Guidance) in preparing this Treasury Management Strategy.
- 2.2 As recommended by the Code, this strategy will be updated at least annually and submitted for the approval of the TfL Board.
- 2.3 TfL has considered the implications of its overall asset and liability management, taking into account its overall exposure to inflation and interest rates as they affect its commercial markets (passenger levels, fare revenues, and costs) and in its financial activities (financing costs and investment returns on cash balances). TfL has also reviewed its exposure to default risk in the investment of its surplus cash given the instability of the financial markets over the last year.
- 2.4 TfL continues to add to its sources of market information to enable it to support its future investment decisions and continues to seek prudent opportunities to maintain yield without risking underlying security.
- 2.5 The Director of Group Treasury and TfL Group Treasury officers will implement, operate and administer the Treasury Management Strategy (including entering into any documentation where appropriate).

3 STRATEGIC OBJECTIVES

3.1 The objectives underpinning the TMS 2014/15 are:

- (a) to undertake treasury management operations with primary regard for the security and liquidity of capital invested;
- (b) to maximise the yield from investments consistent with the security and liquidity objectives identified above;
- (c) to ensure that sufficient cash is available to enable TfL to discharge its financial obligations when they become due, in accordance with approved spending plans;
- (d) to undertake treasury management activity having regard to Prudential Indicators;
- (e) to secure TfL's funding requirements by accessing the most cost efficient source of finance, while ensuring TfL has flexibility and sufficient alternatives not to be dependent on any particular source; and
- (f) to use TfL's statutory power relating to risk management to achieve greater value for money through reducing costs or protecting revenues, reducing volatility / increasing certainty in the Business Plan and to holistically manage financial risks across the whole of TfL.

4 INVESTMENT STRATEGY 2014/15

4.1 All cash balances will be invested in accordance with this Investment Strategy . Under the DCLG Guidance, investments fall into two categories:

- (a) Specified Investments; and
- (b) Non-specified investments.

SPECIFIED INVESTMENTS

4.2 Specified investments offer high security and high liquidity and must satisfy the conditions set out below:

- (a) the investment is denominated in Sterling and any payments or repayments in respect of the investment are payable in Sterling only;
- (b) the investment is not a long-term investment (i.e. has a maturity of less than one year); and
- (c) the investment is either:
 - (i) made with the UK Government; or

- (ii) made with a body or in an investment scheme which has been awarded a high (investment grade) credit rating by a credit rating agency.
- 4.3 Specified investments are limited to institutions and types of investment that have been placed on a TfL 'Approved Investment List'. Investments may be made in any wholly owned and guaranteed UK subsidiary of the counterparties in the Approved Investment List, within the parent institution's aggregate investment limit. The Finance and Policy Committee will approve entities and types of investment that may be added to the Approved Investment List.
- 4.4 In determining whether to recommend to the Finance and Policy Committee to place an institution on the Approved Investment List, TfL Officers will consider:
 - (a) the financial position and jurisdiction of the institution;
 - (b) the market pricing of credit default swaps for the institution;
 - (c) any implicit or explicit Government support for the institution;
 - (d) Standard & Poor's, Moody's and Fitch's short and long term credit ratings; and
 - (e) Tier 1 capital ratios of those institutions.
- 4.5 TfL's maximum investment in any fund will be three point five per cent of fund size.

NON-SPECIFIED INVESTMENTS

- 4.6 Non-specified investments do not, by definition, meet the requirements of a specified investment. The DCLG Guidance recommends an articulated risk management strategy and greater detail of the intended use of non-specified investments due to greater potential risk.
- 4.7 Non-specified investments approved for use by TfL under this strategy are investments in instruments and with entities on the Approved Investment List where:
 - (a) the maximum maturity is one year or greater than one year:
 - (i) any such investments would be in Sterling, so the potential risk for TfL is one of liquidity – that TfL requires the funds that are tied up in longer term deposits. Given the nature of the institutions (in some cases government or government guaranteed) the risk of default is very low;
 - (ii) before placing such longer term deposits, TfL would carry out a detailed cash forecast to determine the need for funds over a longer time period, and only place funds for longer than one year where it was confident on the most conservative basis that the monies would not be required in the meantime; and,

- (iii) any such investments will be in instruments which would be readily accepted as collateral to obtain liquidity facilities, should such a need arise; and
- (b) investments are in currencies other than Sterling:
 - (i) deposits denominated in US Dollars (USD) or Euros, to a maximum amount of £100m, when funds are received in those currencies in the normal course of business and where TfL is expected to have costs in those currencies in the future;
 - (ii) deposits in any currency where the currency is bought in advance of a payment or payments in that currency (for example, if TfL has several payments in Euros within a matter of weeks and it is more cost effective to buy a single tranche of Euros to cover all of the payments rather than buy several smaller amounts on the days each payment is required); or
 - (iii) investments denominated in EUR or USD and swapped back to GBP as a matter of course after taking into account of any natural offsets TfL has to the foreign currency as appropriate.

LIQUIDITY OF INVESTMENTS

- 4.8 TfL will manage its cash to ensure that a minimum of £250m is available for redemption on any business day to ensure TfL has sufficient liquidity to meet its financial obligations.
- 4.9 Each investment decision will be made with regard to expected cash flow requirements resulting in a range of maturity periods within the investment portfolio.
- 4.10 Where the Director of Group Treasury, in consultation with Managing Director, Finance and/or Chief Finance Officer, deems such a step is appropriate in order to protect TfL against potential losses, TfL may break or resell fixed term investments early, including where doing so will result in TfL incurring penalties or crystallising a loss.
- 4.11 Where the Director of Group Treasury, in consultation with the Chief Finance Officer, deems it appropriate, TfL may break or sell fixed term investment instruments as part of a switch into similar instruments where doing so offers a positive investment return. For example, TfL may have the opportunity to sell a holding of T-bills of a particular maturity and buy T-bills with a slightly different maturity with a better return. Market opportunities such as this arise reasonably frequently where market dynamics result in high demand for particular instruments.

COUNTERPARTY INVESTMENT LIMITS AND MATURITY LIMITS

- 4.12 The maximum limits per investment per institution for 2014/15 are shown in the table below:

	S&P	Moody's	Fitch	Investment	Maximum
--	-----	---------	-------	------------	---------

				Limit per counterparty (£m)	tenor of deposit
UK Sovereign and UK Government Guaranteed				Unlimited	Unlimited
Money Market Fund	AAA	Aaa	AAA	3.5% of fund	Max 7 day (normally Instant access)
Non-UK Sovereigns and SSAs	AAA	Aaa	AAA	300	3 years
	AA+	Aa1	AA+	250	3 years
	AA	Aa2	AA	200	3 years
	AA-	Aa3	AA-	175	3 years
	A+	A1	A+	150	2 years
	A	A2	A	125	12 months
	A-	A3	A-	100	12 months
	BBB+	Baa	BBB+	0	n.a.
Banks	AAA	Aaa	AAA	300	12 years
	AA+	Aa1	AA+	250	12 years
	AA	Aa2	AA	200	12 years
	AA-	Aa3	AA-	175	12 years
	A+	A1	A+	150	12 years
	A	A2	A	125	12 months
	A-	A3	A-	100	12 months
	BBB+	Baa	BBB+	0	n.a.
Corporates	AAA	Aaa	AAA	300	12 years
	AA+	Aa1	AA+	250	12 years
	AA	Aa2	AA	200	12 years
	AA-	Aa3	AA-	175	12 years
	A+	A1	A+	150	6 years
	A	A2	A	125	6 months
	A-	A3	A-	100	6 months
	BBB+	Baa	BBB+	0	n.a.

- 4.13 The counterparty credit limits apply solely to institutions on the Approved Investment List.
- 4.14 Where an instrument benefits from a UK Government Guarantee, the investment limit will be that for UK Government Guaranteed rather than the entity guaranteed by the UK Government.
- 4.15 Where an instrument benefits from collateral arrangements, for example Repos, the investment exposure will be calculated based on maximum expected movements in the value of collateral with a 99% confidence level and not the face value of the sum invested. For example the exposure on daily adjusted repo arrangements will £2.3m per £100m.
- 4.16 In exceptional circumstances the applicable limit for TfL's clearing bank may be temporarily exceeded, for example where cash is available for investment after the daily deadline for deposits with the DMO has passed. Any such circumstance will be immediately notified to the Managing Director, Finance and Chief Finance Officer.
- 4.17 Where a counterparty has a split credit rating, the Investment Limit for each rating is calculated as the average of the relevant Investment Limits for each rating level available i.e. the limit is derived by taking the sum of one third of the applicable limit for each rating agency. The maximum tenor of deposit will be that of the lowest rating.
- 4.18 If the Investment Limit applicable to a counterparty changes while TfL has an outstanding investment with that counterparty, TfL may seek to bring its exposure down to within the revised limits but a breach of limits caused by such a change will not be considered a breach of this policy. TfL may at the Director of Group Treasury's discretion (in consultation with the Managing Director, Finance and/or Chief Finance Officer) decide to allow an investment to run its course for economic reasons.

5 INVESTMENT MATURITY LIMIT / INVESTMENT DOCUMENTATION

- 5.1 As recommended by the Code, TfL establishes a limit on sums that are invested for periods longer than 364 days. These are established by a separate Prudential Indicators document approved by the Mayor.
- 5.2 Without further reference to the Finance and Policy Committee, the Director of Group Treasury and/or TfL Group Treasury officers may enter into any investment related agreements and/or documentation required to execute the Investment Strategy.

6 BORROWING STRATEGY 2014/15

- 6.1 TfL's objective is to manage its borrowing in a manner that combines flexibility, security of access to funds, diversity of funding sources and value for money. TfL seeks to achieve this by maintaining access to capital markets through its Euro Commercial Paper (ECP) programme and Euro Medium Term Note (EMTN) programme, and complementing this with loans and other facilities

from banks where appropriate. TfL's borrowing plans are ultimately underpinned by access to the Public Works Loan Board (PWLb); other sources of funding will be used where they further TfL's stated objectives (i.e. offer better value for money, flexibility, security of access or diversity of funding sources).

- 6.2 TfL recognises the value of its strong credit rating in facilitating low cost debt finance and other financial instruments and intends to maintain its credit rating relative to that of the UK Government.
- 6.3 TfL intends to build upon the success of the liquid, benchmark sized bonds issued under its EMTN programme where this represents good value for money.
- 6.4 TfL intends to borrow an additional £650m in 2014/15 (in accordance with the 2010 funding settlement). £100m of this borrowing has already been arranged and approved and will be drawn in April 2014 from the European Investment Bank (EIB) under the fixed rate loan in support of Crossrail. The balance of TfL's borrowing for the year will be drawn from TfL's Approved Borrowing Sources.
- 6.5 TfL's Approved Borrowing Sources comprise:
 - (a) the PWLB;
 - (b) TfL's EMTN programme;
 - (c) TfL Notes issued under standalone documentation;
 - (d) TfL's ECP programme;
 - (e) EIB or commercial bank loans; and
 - (f) A £200m overdraft facility with HSBC;
- 6.6 Additional sources of borrowing may only be added to the Approved Borrowing Sources with the approval of the Finance and Policy Committee.
- 6.7 The Finance and Policy Committee's approval is required for any newly arranged facility (but not facilities being renewed) through the EIB or commercial banks.
- 6.8 Issuance under TfL's EMTN programme or the issuance of Notes using standalone documentation are both permitted subject to the prior written approval of Managing Director, Finance or Chief Finance Officer provided that:
 - (a) any such issuance is in accordance with any relevant parameters set out in the Treasury Management Strategy 2014/15; and,
 - (b) Officers consult with as many Members of the Finance and Policy Committee as are available, on:
 - (i) the proposed term and amount of such Note issuance in advance of issuance; and

- (ii) the need for any Supplemental Prospectus prior to the proposed Note issuance.
- 6.9 The prior written approval of Managing Director, Finance or Chief Finance Officer is required for any new borrowing from the PWLB.
- 6.10 Without further reference to the Finance and Policy Committee, TfL will use the ECP programme and any other short-term facilities approved by the Finance and Policy Committee e.g. overdraft or commercial paper back-stop facilities, to meet its short-term liquidity requirements pending the execution of longer-term borrowing agreed with the Finance and Policy Committee.
- 6.11 TfL will normally arrange new short-term borrowings to replace short-term borrowings falling due for repayment. In order to limit the liquidity risk that this creates TfL manages maturities such that no more than £200m of short-term borrowings falls due for repayment in any three day period.
- 6.12 The overdraft facility will not be used in the normal course of business, but only for short periods to meet unexpected liquidity requirements. The Managing Director, Finance will be notified immediately of any drawing of more than £20m on the overdraft facility.
- 6.13 As required by the Local Government Act 2003, at all times, the aggregate of all of TfL's liabilities will be within the Authorised Limit set by the Mayor and adopted by the Board.
- 6.14 Where TfL is issuing new medium or long-term debt, or refinancing existing debt, it may be necessary or commercially desirable to draw the new debt prior to the repayment of the debt being refinanced, which may result in a temporary increase in liabilities above the planned incremental borrowing for the year. Borrowing in excess of the planned incremental borrowing is permitted provided the position is temporary and that TfL remains within the Authorised Limit at all times (i.e. it reflects the temporary utilisation of headroom between the planned incremental borrowing and the legal limit on TfL's liabilities).
- 6.15 The Code requires that upper and lower limits are set for the mix of fixed and variable rate borrowing, and for the maturity structure of fixed rate borrowings to manage interest rate risk. These are established by a separate Prudential Indicators document approved by the Mayor.

LIABILITY MANAGEMENT

- 6.16 TfL will seek to buyback, refinance, or otherwise restructure, existing liabilities (including finance leases) where doing so represents value for money, or will improve the structure of TfL's liabilities, or facilitate changes to TfL's corporate structure.
- 6.17 TfL may pre-pay or refinance loans or re-purchase or redeem existing debt instruments in accordance with the delegated authorities set out in TfL Standing Orders
- 6.18 Any liability management exercise in excess of these limits will be subject to the approval of the Finance and Policy Committee.

MINIMUM REVENUE PROVISION

- 6.19 The Minimum Revenue Provision (MRP) is a Government mandated mechanism requiring local authorities to set aside an amount from current revenue resources in relation to future debt repayment. The MRP policy has to be approved by the Board each year.
- 6.20 TfL has a duty to determine for the current financial year an amount of minimum revenue provision that it considers to be 'prudent' in relation to debt service obligations.
- 6.21 TfL's policy on MRP remains unchanged from 2013/14. That is to treat debt service (interest and principal) in its business plan as an in-year operating cost. As TfL has a legal requirement to produce a balanced budget (and this approach had been extended to the full business plan), the cost of debt service is taken into account when determining whether annual budget and business plans are in balance.

7 RISK MANAGEMENT STRATEGY 2014/15

- 7.1 TfL is materially exposed to a number of specific financial risks in the ordinary course of business, arising from the borrowing programme, the capital investment programme and certain ongoing contractual obligations. There is significant potential to reduce costs and add value to TfL by managing financial risks more effectively.
- 7.2 Under Section 49 of the Transport for London Act 2008 (the TfL Act), TfL was conferred powers to make arrangements for risk mitigation.
- 7.3 This Risk Management Strategy 2014/15 provides for measures to address identifiable financial risks that fall within the categories outlined below:
- (a) interest rate risk related to TfL's planned future borrowing requirements;
 - (b) exchange rate risk related to specific currency exposures arising from the procurement of goods or services by the TfL Group; and from receipts of European Union (EU) subsidies or other grants / revenues payable other than in Sterling; and,
 - (c) commodity price risk related to specific procurements containing a significant cost element for a commodity component and ongoing operational procurements such as power and fuel.
- 7.4 The high level principles established by this Risk Management Strategy 2014/15 are to:
- (a) achieve greater value for money through reducing costs or protecting revenues;
 - (b) reduce volatility / increase certainty relating to the impact of financial risks upon the business plan; and
 - (c) holistically manage financial risks across the whole of TfL.

- 7.5 Where TfL arranges derivative investments through its subsidiary, Transport for London Finance Limited, it may put in place intra-group arrangements to confer the benefit of those derivative investments to the TfL entity bearing the underlying risk.
- 7.6 Under the TfL Group Policy relating to the use of Derivative Investments, the Finance and Policy Committee have delegated authority to approve derivative transactions.

TRANSPORT FOR LONDON

TREASURY MANAGEMENT STRATEGY ~~2013/14~~2014/15

1 SUMMARY

- 1.1 This TfL Treasury Management Strategy (TMS) ~~2013/14~~2014/15 comprises the:
- (a) Investment Strategy ~~2013/14~~2014/15;
 - (b) Borrowing Strategy ~~2013/14~~2014/15; and,
 - (c) Risk Management Strategy ~~2013/14~~2014/15.

2 BACKGROUND INFORMATION

- 2.1 TfL has had regard to the key recommendations of CIPFA's Code of Practice and Cross-Sectoral Guidance Notes for Treasury Management in the Public Services 2011 (the 'Code') and the revised investment guidance issued by the Department for Communities and Local Government (DCLG) which came into effect from 1 April 2010 (DCLG Guidance) in preparing this Treasury Management Strategy.
- 2.2 As recommended by the Code, this strategy will be updated at least annually and submitted for the approval of the TfL Board.
- 2.3 TfL has considered the implications of its overall asset and liability management, taking into account its overall exposure to inflation and interest rates as they affect its commercial markets (passenger levels, fare revenues, and costs) and in its financial activities (financing costs and investment returns on cash balances). TfL has also reviewed its exposure to default risk in the investment of its surplus cash given the instability of the financial markets over the last year.
- 2.4 TfL continues to add to its sources of market information to enable it to support its future investment decisions and continues to seek prudent opportunities to maintain yield without risking underlying security.
- 2.5 The ~~TfL Director of Group Treasury~~Group Treasurer and TfL Group Treasury officers will implement, operate and administer the Treasury Management Strategy (including entering into any documentation where appropriate).

3 STRATEGIC OBJECTIVES

3.1 The objectives underpinning the TMS ~~for 2013/14~~2014/15 are:

- (a) to undertake treasury management operations with primary regard for the security and liquidity of capital invested;
- (b) to maximise the yield from investments consistent with the security and liquidity objectives identified above;
- (c) to ensure that sufficient cash is available to enable TfL to discharge its financial obligations when they become due, in accordance with approved spending plans;
- (d) to undertake treasury management activity having regard to Prudential Indicators;
- (e) to secure TfL's funding requirements by accessing the most cost efficient source of finance, while ensuring TfL has flexibility and sufficient alternatives not to be dependent on any particular source; and
- (f) to use TfL's statutory power relating to risk management to achieve greater value for money through reducing costs or protecting revenues, reducing volatility / increasing certainty in the Business Plan and to holistically manage financial risks across the whole of TfL.

4 INVESTMENT STRATEGY ~~2013/14~~2014/15

4.1 All cash balances will be invested in accordance with this Investment Strategy . Under the DCLG Guidance, investments fall into two categories:

- (a) Specified Investments; and
- (b) Non-specified investments.

SPECIFIED INVESTMENTS

4.2 Specified investments offer high security and high liquidity and must satisfy the conditions set out below:

- (a) the investment is denominated in Sterling and any payments or repayments in respect of the investment are payable in Sterling only;
- (b) the investment is not a long-term investment (i.e. has a maturity of less than one year); and
- (c) the investment is either:
 - (i) made with the UK Government; or

- (ii) made with a body or in an investment scheme which has been awarded a high (investment grade) credit rating by a credit rating agency.

4.3 Specified investments are limited to institutions and types of investment that have been placed on a TfL 'Approved Investment List'. Investments may be made in any wholly owned and guaranteed UK subsidiary of the counterparties in the Approved Investment List, within the parent institution's aggregate investment limit. The Finance and Policy Committee will approve entities and types of investment that may be added to the Approved Investment List.

4.4 In determining whether to recommend to the Finance and Policy Committee to place an institution on the Approved Investment List, TfL Officers will consider:

- (a) the financial position and jurisdiction of the institution;
- (b) the market pricing of credit default swaps for the institution;
- (c) any implicit or explicit Government support for the institution;
- (d) Standard & Poor's, Moody's and Fitch's short and long term credit ratings; and
- (e) Tier 1 capital ratios of those institutions.

~~4.5 In determining whether to recommend Money Market Funds (MMFs) to the Finance and Policy Committee for inclusion on the Approved Investment List, TfL Officers will consider only MMF that:~~

- ~~(a) are AAA-rated (or equivalent) by at least two of the three main rating agencies;~~
- ~~(b) a member of the Institutional Money Market Funds Association;~~
- ~~(c) owned or backed by a UK clearing bank or by a reputable investment management company;~~
- ~~(d) are of a minimum size of £1bn;~~
- ~~(e) do not invest in equities, alternative assets, or derivatives;~~
- ~~(f) do not have more than 10% of total fund size invested in Asset Backed Commercial Paper;~~
- ~~(g) have a maximum notice period to access the funds of seven days, though likely to be intra-day access;~~
- ~~(h) have a weighted average maturity (WAM) of investments no greater than 60 days; and~~
- ~~(i) have a weighted average final maturity (WAFM) of investments no greater than 90 days.~~

4.64.5 TfL's maximum investment in any fund will be three point five per cent of fund size.

NON-SPECIFIED INVESTMENTS

~~4.74.6~~ Non-specified investments do not, by definition, meet the requirements of a specified investment. The DCLG Guidance recommends an articulated risk management strategy and greater detail of the intended use of non-specified investments due to greater potential risk.

~~4.84.7~~ Non-specified investments approved for use by TfL under this strategy are investments in instruments and with entities on the Approved Investment List where:

(a) the maximum maturity is one year or greater than one year:

- (i) any such ~~investments~~ would be in Sterling, so the potential risk for TfL is one of liquidity – that TfL requires the funds that are tied up in longer term deposits. Given the nature of the institutions (in some cases government or government guaranteed) the risk of default is very low;
- (ii) before placing such longer term deposits, TfL would carry out a detailed cash forecast to determine the need for funds over a longer time period, and only place funds for longer than one year where it was confident on the most conservative basis that the monies would not be required in the meantime; and ~~and~~
- (iii) any such investments will be in instruments which would be readily accepted as collateral to obtain liquidity facilities, should such a need arise; and

(b) investments are in currencies other than Sterling:

- (i) deposits denominated in US Dollars (USD) or Euros, to a maximum amount of £100m, when funds are received in those currencies in the normal course of business and where TfL is expected to have costs in those currencies in the future; ~~or~~
- (ii) deposits in any currency where the currency is bought in advance of a payment or payments in that currency (for example, if TfL has several payments in Euros within a matter of weeks and it is more cost effective to buy a single tranche of Euros to cover all of the payments rather than buy several smaller amounts on the days each payment is required ~~); or~~

(iii) investments denominated in EUR or USD and swapped back to GBP as a matter of course after taking into account of any natural offsets TfL has to the foreign currency as appropriate.

LIQUIDITY OF INVESTMENTS

4.94.8 TfL will manage its cash to ensure that a minimum of £250m is available for redemption on any business day to ensure TfL has sufficient liquidity to meet its financial obligations.

4.104.9 Each investment decision will be made with regard to expected cash flow requirements resulting in a range of maturity periods within the investment portfolio.

4.114.10 Where the [Director of Group Treasury](#)~~Group Treasurer~~, in consultation with Managing Director, Finance and/or Chief Finance Officer, deems such a step is appropriate in order to protect TfL against potential losses, TfL may break or resell fixed term investments early, including where doing so will result in TfL incurring penalties or crystallising a loss.

4.124.11 Where the [Director of Group Treasury](#)~~Group Treasurer~~, in consultation with the Chief Finance Officer, deems it appropriate, TfL may break or sell fixed term investment instruments as part of a switch into similar instruments where doing so offers a positive investment return. For example, TfL may have the opportunity to sell a holding of T-bills of a particular maturity and buy T-bills with a slightly different maturity with a better return. Market opportunities such as this arise reasonably frequently where market dynamics result in high demand for particular instruments.

COUNTERPARTY INVESTMENT LIMITS AND MATURITY LIMITS

4.134.12 The maximum limits per investment per institution for ~~2013/14~~2014/15 are shown in the table below:

	S&P	Moody's	Fitch	Investment Limit per counterparty (£m)	Maximum tenor of deposit
UK Sovereign and UK Government Guaranteed				Unlimited	Unlimited
Money Market Fund	AAA	Aaa	AAA	3.5% of fund	Max 7 day (normally Instant access)
Non- UK Sovereigns, SSAs, Transports and Banks <u>SSAs</u>	AAA	Aaa	AAA	300	3 years
	AA+	Aa1	AA+	250	3 years
	AA	Aa2	AA	200	3 years
	AA-	Aa3	AA-	175	3 years
	A+	A1	A+	150	2 years
	A	A2	A	125	12 months
	A-	A3	A-	100	12 months

Formatted Table

	BBB	Baa	BBB+	0	n.a.
<u>Banks</u>	<u>AAA</u>	<u>Aaa</u>	<u>AAA</u>	<u>300</u>	<u>12 years</u>
	<u>AA+</u>	<u>Aa1</u>	<u>AA+</u>	<u>250</u>	<u>12 years</u>
	<u>AA</u>	<u>Aa2</u>	<u>AA</u>	<u>200</u>	<u>12 years</u>
	<u>AA-</u>	<u>Aa3</u>	<u>AA-</u>	<u>175</u>	<u>12 years</u>
	<u>A+</u>	<u>A1</u>	<u>A+</u>	<u>150</u>	<u>12 years</u>
	<u>A</u>	<u>A2</u>	<u>A</u>	<u>125</u>	<u>12 months</u>
	<u>A-</u>	<u>A3</u>	<u>A-</u>	<u>100</u>	<u>12 months</u>
	<u>BBB</u>	<u>Baa</u>	<u>BBB+</u>	<u>0</u>	<u>n.a.</u>
<u>Corporates</u>	<u>AAA</u>	<u>Aaa</u>	<u>AAA</u>	<u>300</u>	<u>12 years</u>
	<u>AA+</u>	<u>Aa1</u>	<u>AA+</u>	<u>250</u>	<u>12 years</u>
	<u>AA</u>	<u>Aa2</u>	<u>AA</u>	<u>200</u>	<u>12 years</u>
	<u>AA-</u>	<u>Aa3</u>	<u>AA-</u>	<u>175</u>	<u>12 years</u>
	<u>A+</u>	<u>A1</u>	<u>A+</u>	<u>150</u>	<u>6 years</u>
	<u>A</u>	<u>A2</u>	<u>A</u>	<u>125</u>	<u>6 months</u>
	<u>A-</u>	<u>A3</u>	<u>A-</u>	<u>100</u>	<u>6 months</u>
	<u>BBB</u>	<u>Baa</u>	<u>BBB+</u>	<u>0</u>	<u>n.a.</u>

Formatted: Left

Formatted Table

4.144.13 The counterparty credit limits apply solely to institutions on the Approved Investment List.

4.154.14 Where an instrument benefits from a UK Government Guarantee, the investment limit will be that for UK Government Guaranteed rather than the entity guaranteed by the UK Government.

4.164.15 Where an instrument benefits from collateral arrangements, for example Repos, the investment exposure will be calculated based on maximum expected movements in the value of collateral with a 99% confidence level and not the face value of the sum invested. For example the exposure on daily adjusted repo arrangements will £2.3m per £100m.

4.174.16 In exceptional circumstances the applicable limit for TfL's clearing bank may be temporarily exceeded, for example where cash is available for investment after the daily deadline for deposits with the DMO has passed. Any such circumstance will be immediately notified to the Managing Director, Finance and Chief Finance Officer.

4.184.17 Where a counterparty has a split credit rating, the Investment Limit for each rating is calculated as the average of the relevant Investment Limits for each rating level available i.e. the limit is derived by taking the sum of one third

of the applicable limit for each rating agency. The maximum tenor of deposit will be that of the lowest rating.

~~4.19~~4.18 If the Investment Limit applicable to a counterparty changes while TfL has an outstanding investment with that counterparty, TfL may seek to bring its exposure down to within the revised limits but a breach of limits caused by such a change will not be considered a breach of this policy. TfL may at the [Director of Group Treasury](#)~~Group Treasurer~~'s discretion (in consultation with the Managing Director, Finance and/or Chief Finance Officer) decide to allow an investment to run its course for economic reasons.

5 INVESTMENT MATURITY LIMIT / INVESTMENT DOCUMENTATION

5.1 As recommended by the Code, TfL establishes a limit on sums that are invested for periods longer than 364 days. These are established by a separate Prudential Indicators document approved by the Mayor.

5.2 Without further reference to the Finance and Policy Committee, the Director of Group Treasury and/or TfL Group Treasury officers may enter into any investment related agreements and/or documentation required to execute the Investment Strategy.

6 BORROWING STRATEGY ~~2013/14~~2014/15

6.1 TfL's objective is to manage its borrowing in a manner that combines flexibility, security of access to funds, diversity of funding sources and value for money. TfL seeks to achieve this by maintaining access to capital markets through its [Euro Commercial Paper \(ECP\)](#) programme and [Euro Medium Term Note \(EMTN\)](#) programme, and complementing this with loans and other facilities from banks where appropriate. TfL's borrowing plans are ultimately underpinned by access to the Public Works Loan Board (PWLB); other sources of funding will be used where they further TfL's stated objectives (i.e. offer better value for money, flexibility, security of access or diversity of funding sources).

6.2 TfL recognises the value of its strong credit rating in facilitating low cost debt finance and other financial instruments and intends to maintain its credit rating relative to that of the UK Government.

~~6.26~~3 TfL intends to build upon the success of the liquid, benchmark sized bonds issued under its ~~Euro Medium Term Note (EMTN)~~ programme where this represents good value for money.

~~6.36~~4 TfL intends to borrow an additional ~~£345m~~£650m in ~~2013/14~~2014/15 (in accordance with the 2010 funding settlement). ~~£150m~~£100m of this borrowing has already been arranged and approved and will be drawn in April ~~2013~~2014 from the European Investment Bank (EIB) under the fixed rate loan in support of Crossrail. The balance of TfL's borrowing for the year will be drawn from TfL's Approved Borrowing Sources. ~~TfL also intends to replace an element of its rolling short-term debt with longer-term finance.~~

6.46.5 TfL's Approved Borrowing Sources comprise:

- (a) the PWLB;
- (b) TfL's EMTN programme;
- (c) TfL Notes issued under standalone documentation;
- ~~(e)(d)~~ TfL's ~~Euro Commercial Paper (ECP)~~ programme;
- ~~(d)(e)~~ EIB or commercial bank loans; and,
- ~~(e)(f)~~ A £200m overdraft facility with HSBC;

6.56.6 Additional sources of borrowing may only be added to the Approved Borrowing Sources with the approval of the Finance and Policy Committee.

6.66.7 The Finance and Policy Committee's approval is required for any newly arranged facility (but not facilities being renewed) through the EIB or commercial banks.

6.76.8 Issuance under TfL's ~~MTN~~EMTN programme is or the issuance of Notes using standalone documentation are both permitted subject to the prior written approval of Managing Director, Finance or Chief Finance Officer provided that:

- (a) any such issuance is in accordance with any relevant parameters set out in the Treasury Management Strategy ~~2013/14~~2014/15; and,
- (b) Officers consult with as many Members of the Finance and Policy Committee as are available, on:
 - (i) the proposed term and amount of such Note issuance ~~and/or derivative investment~~ in advance of ~~such Note issuance and/or derivative investment~~; and
 - (ii) the need for any Supplemental Prospectus prior to the proposed Note issuance.

6.86.9 The prior written approval of Managing Director, Finance or Chief Finance Officer is required for any new borrowing from the PWLB.

6.96.10 Without further reference to the Finance and Policy Committee, TfL will use the ECP programme and any other short-term facilities approved by the Finance and Policy Committee e.g. overdraft or commercial paper back-stop facilities, to meet its short-term liquidity requirements pending the execution of longer-term borrowing agreed with the Finance and Policy Committee.

6.106.11 TfL will normally arrange new short-term borrowings to replace short-term borrowings falling due for repayment. In order to limit the liquidity risk that this creates TfL manages maturities such that no more than £200m of short-term borrowings falls due for repayment in any three day period.

6.116.12 The overdraft facility will not be used in the normal course of business, but only for short periods to meet unexpected liquidity requirements. The

Managing Director, Finance will be notified immediately of any drawing of more than £20m on the overdraft facility.

~~6.126.13~~ As required by the Local Government Act 2003, aAt all times, the aggregate of all of TfL's liabilities will be within the Authorised Limit set by the Mayor and adopted by the Board.

~~6.136.14~~ Where TfL is issuing new medium or long-term debt, or refinancing existing debt, it may be necessary or commercially desirable to draw the new debt prior to the repayment of the debt being refinanced, which may result in a temporary increase in liabilities above the planned incremental borrowing for the year. Borrowing in excess of the planned incremental borrowing is permitted provided the position is temporary and that TfL remains within the Authorised Limit at all times (i.e. it reflects the temporary utilisation of headroom between the planned incremental borrowing and the legal limit on TfL's liabilities).

~~6.146.15~~ The Code requires that upper and lower limits are set for the mix of fixed and variable rate borrowing, and for the maturity structure of fixed rate borrowings to manage interest rate risk. These are established by a separate Prudential Indicators document approved by the Mayor.

LIABILITY MANAGEMENT

~~6.156.16~~ TfL will seek to buyback, refinance, or otherwise restructure, existing liabilities (including finance leases) where doing so represents value for money, or will improve the structure of TfL's liabilities, or facilitate changes to TfL's corporate structure.

~~6.166.17~~ TfL may pre-pay or refinance loans or re-purchase or redeem existing debt instruments in accordance with the delegated authorities set out in TfL Standing Orders

~~6.176.18~~ Any liability management exercise in excess of these limits will be subject to the approval of the Finance and Policy Committee.

MINIMUM REVENUE PROVISION

~~6.186.19~~ The Minimum Revenue Provision (MRP) is a Government mandated mechanism requiring local authorities to set aside an amount from current revenue resources in relation to future debt repayment. The MRP policy has to be approved by the Board each year.

~~6.196.20~~ TfL has a duty to determine for the current financial year an amount of minimum revenue provision that it considers to be 'prudent' in relation to debt service obligations.

~~6.206.21~~ TfL's policy on MRP remains unchanged from ~~2012/13~~2013/14. That is to treat debt service (interest and principal) in its business plan as an in-year operating cost. As TfL has a legal requirement to produce a balanced budget (and this approach had been extended to the full business plan), the cost of

debt service is taken into account when determining whether annual budget and business plans are in balance.

7 RISK MANAGEMENT STRATEGY ~~2013/14~~2014/15

- 7.1 TfL is materially exposed to a number of specific financial risks in the ordinary course of business, arising from the borrowing programme, the capital investment programme and certain ongoing contractual obligations. There is significant potential to reduce costs and add value to TfL by managing financial risks more effectively.
- 7.2 Under Section 49 of the Transport for London Act 2008 (the TfL Act), TfL was conferred powers to make arrangements for risk mitigation.
- 7.3 This Risk Management Strategy ~~2013/14~~2014/15 provides for measures to address identifiable financial risks that fall within the categories outlined below:
- (a) interest rate risk related to TfL's planned future borrowing requirements;
 - (b) exchange rate risk related to specific currency exposures arising from the procurement of goods or services by the TfL Group; and from receipts of European Union (EU) subsidies or other grants / revenues payable other than in Sterling; and,
 - (c) commodity price risk related to specific procurements containing a significant cost element for a commodity component and ongoing operational procurements such as power and fuel.
- 7.4 The high level principles established by this Risk Management Strategy ~~2013/14~~2014/15 are to:
- (a) achieve greater value for money through reducing costs or protecting revenues;
 - (b) reduce volatility / increase certainty relating to the impact of financial risks upon the business plan; and
 - (c) holistically manage financial risks across the whole of TfL.
- 7.5 Where TfL arranges derivative investments through its subsidiary, Transport for London Finance Limited, it may put in place intra-group arrangements to confer the benefit of those derivative investments to the TfL entity bearing the underlying risk.
- 7.6 Under the TfL Group Policy relating to the use of Derivative Investments, the Finance and Policy Committee have delegated authority to approve derivative transactions. ~~It is expected that during the year, TfL will propose a number of specific risk management programmes to the Finance and Policy Committee.~~

Appendix 3: Approved Investments List 2013/14

Sovereigns

1. Australia
2. Canada
3. Denmark
4. Finland
5. Germany
6. Sweden
7. Switzerland
8. The Netherlands
9. UK Government and its executive agency, the Debt Management Office (DMO)
10. United States of America

Money Market Funds

11. BlackRock Institutional Sterling Government Liquidity Fund
12. BlackRock Institutional Sterling Liquidity Fund
13. Deutsche Global Liquidity Series – Sterling Fund
14. HSBC Global Liquidity Fund
15. Ignis Liquidity Fund
16. Insight Liquidity Funds – GBP Liquidity Fund
17. JP Morgan Sterling Liquidity Fund
18. LGIM Liquidity Fund
19. RBS MMF
20. Scottish Widows Investment Partnership (SWIP – part of the Lloyds Banking Group)

Supra-nationals

21. Asia Development Bank (ADB)
22. European Bank for Reconstruction and Development (EBRD)
23. European Investment Bank (EIB)
24. Inter-American Development Bank (IADB)
25. World Bank (International Bank for Reconstruction and Development/IBRD)
26. International Finance Corporation (IFC)
27. Nordic Investment Bank (NIB)

Agencies and Other Issuers

28. Bank Nederlandse Gemeenten (BNG)
29. Caisse d'Amortissement de la Dette Sociale (Cades)
30. Erste Abwicklungsanstalt (EAA)
31. Export Development Canada (EDC)
32. FMS Wertmanagement AoR (FMS)
33. KfW Bankengruppe (KfW)
34. Kommunalbanken AS (KommBank)
35. Kommunekredit (KommCrd)
36. Kommuninvest i Sverige (KommInv)
37. Land Saxony-Anhalt
38. Landeskreditbank Baden-Wuertte Foerderbank (L-Bank)
39. Landwirtschaftliche Rentenbank (Retenbank)
40. New South Wales Treasury Corp
41. NRW BANK
42. Network Rail
43. Oesterreichische Kontrollbank
44. Queensland Treasury Corp

Banks

45. Barclays
46. Deutsche Bank Group
47. HSBC
48. Lloyds Banking Group
49. RBS
50. Standard Chartered

Including any wholly owned subsidiary of the counterparties listed above.

Investment instruments

- (i) UK Treasury Bills, Gilts and Debt Management Office deposits;
- (ii) repurchase agreements ("Repos") on UK Government Treasury Bills and Gilts;
- (iii) bank deposits and certificates of deposit;
- (iv) bonds and commercial paper; and
- (v) MMFs.

Appendix 4: Approved Derivative Counterparties 2013/14

1. Barclays Bank
2. BNP Paribas
3. Credit Suisse
4. Deutsche Bank
5. HSBC
6. Lloyds TSB (UK Government Support)
7. RBS (UK Government Support)
8. Santander
9. UBS
10. Goldman Sachs