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**Working Paper**

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CESifo Working Paper, No. 2300

**Provided in Cooperation with:**

Ifo Institute – Leibniz Institute for Economic Research at the University of Munich

*Suggested Citation:* Klautke, Tina; Weichenrieder, Alfons J. (2008) : Interest income tax evasion, the EU savings directive, and capital market effects, CESifo Working Paper, No. 2300, Center for Economic Studies and ifo Institute (CESifo), Munich

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# Interest Income Tax Evasion, the EU Savings Directive, and Capital Market Effects

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CESIFO WORKING PAPER NO. 2300  
CATEGORY 1: PUBLIC FINANCE  
MAY 2008

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# Interest Income Tax Evasion, the EU Savings Directive, and Capital Market Effects

## Abstract

The Savings Directive has been celebrated as a major political break-through in coordinating taxation in Europe. Against this background, the present paper evaluates the real-world effects of this directive. The directive has left a loophole by providing grandfathering (exemption from withholding tax) for some securities. In this paper we compare the pre-tax returns of exempt bonds and comparable taxable bonds. If working around the Savings Directive is difficult for tax evaders in Europe, then investors should be willing to pay a premium for bonds that are exempt from the withholding rate. Conversely, if such a premium is absent, then we may conclude that the supply of existing loopholes (exempt bonds included) is large enough to allow tax evaders to continue evasion at no additional cost. The findings of our study are in line with this latter interpretation.

JEL Code: H24.

Keywords: Savings Directive, interest taxation, tax capitalization, Austria, Belgium Luxembourg, Liechtenstein.

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30. April 2008

We are grateful for helpful discussions with Ludwig Andorfer and Uwe Hassler. All remaining errors are ours.

## I. INTRODUCTION

In the EU, coordinated action in the area of direct taxation is difficult to achieve and few measures have been adopted in the past. A recent exception is the "Directive on taxation of savings income in the form of interest payments", more commonly known as the "Savings Directive" (European Community 2003/48/EC). The ultimate aim of this directive is to allow member states of the EU to tax interest income of resident individuals if they earn interest income abroad. Without cross-border coordination between states, a large portion of interest income earned abroad may be concealed by taxpayers and the taxation of interest becomes highly incomplete.

Against this background, the agreement on the Savings Directive has been celebrated as a major breakthrough.<sup>1</sup> As of 1<sup>st</sup> July 2005, the directive requires a member state A to electronically report to the country of residence B when an individual resident in B is paid interest income by a bank in A. An exception applies for Austria, Belgium and Luxembourg. For a (potentially indefinite) intermediate period, these member states are exempt from providing information exchange, unless the foreign investor consents. Instead, these countries have to levy a withholding tax on interest income paid to residents in other member states, 75% of which has to be forwarded to the relevant countries of residence, but without revealing the identity of the interest recipient. This agreement became effective only after equivalent arrangements have been negotiated with third countries (Andorra, Liechtenstein, Monaco, San Marino, and Switzerland) and overseas and associated territories, like the British Virgin Islands, the Turks and Caicos Islands, Guernsey, Jersey, the Isle of Man, and the Netherlands Antilles. From 1<sup>st</sup> July 2005, the relevant withholding rate is 15%. The directive 2003/48/EC (as revised by 2004/587/EC) provides for an increase to 20% in mid-2008 and to 35% in mid-2011.

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<sup>1</sup> See, e.g., Bundesministerium der Finanzen (2007, p. 51).

An important question is whether the Savings Directive is only a political symbol and fig leaf or whether it has real world implications for the amount of taxable interest income evaded. Doubts about the effectiveness of the directive may arise since several loopholes obviously exist. For example, the Savings Directive applies to a narrow definition of interest income only. Most returns from investment funds are exempt, as are dividends on shares, income from life insurances, and derivatives. Further, despite remarkable success in striking agreements, the list of third countries that have cooperated with the EU in striking comparable agreements is certainly incomplete and a considerable number of non-European tax havens are still available for tax evasion.<sup>2</sup> Eventually, even within Europe withholding taxes only apply to interest paid to private individuals, so the use of legal intermediate entities, as for example the Liechtenstein family foundations, which recently have received quite some attention, free banks from the obligation of applying the withholding tax.

So far, there is only limited evidence about the effectiveness of the Savings Directive. In 2006, Germany for example has received a total of €144.5m in forwarded withholding taxes from cooperating countries (Austria, Belgium, Luxembourg, and several non-EU countries) and the information provided on cross-border interest income by Germans covers some €1.5bn.<sup>3</sup> At the same time, it is unclear to what extent these figures indicate a reduction in interest income evasion. The reported income may simply refer to the portion of interest income that would have been filed by honest taxpayers even in the absence of the information exchange and similarly, the withholding taxes may apply to interest income that is reported in Germany, and where taxpayers take out a tax credit for withholding taxes paid abroad.

In this paper we study the availability of loopholes by measuring the cost that taxpayers are willing to incur to take advantage of a particular loophole provided by the savings directive. According to Article 15 of the directive, negotiable bonds that have been issued before 1<sup>st</sup> March 2001 are exempt from the withholding tax as long as Austria, Belgium

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<sup>2</sup> At the time of writing, talks with Singapore, Hong Kong and Macao have already been initiated. A detailed discussion on possible limitations of the directive provides the Expert Group on the Taxation of Savings (2007).

<sup>3</sup> Bundesministerium der Finanzen (2007).

and Luxembourg use withholding taxes instead of providing information exchange.<sup>4</sup> The preamble of the directive justifies this exception by the objective to avoid possible "market disruptions." This "grandfathering" of older bonds makes these securities the preferred choice for tax dodgers: in the absence of further taxation in the country of residence, these investors will prefer the bonds that are exempt from the withholding rates over bonds that are taxed or bonds that are deposited at banks in countries that provide information exchange.

The present paper investigates whether the securities that qualify for this grandfathering rule have experienced a decrease in pre-tax return that may reflect the additional demand of tax evaders. If other loopholes are costly, then dishonest taxpayers will be willing to accept a lower before tax return on grandfathered securities that allow avoidance of the withholding tax rate compared to securities that are subject to the withholding tax. Whether dishonest taxpayers who consider shifting towards grandfathered bonds indeed have to accept a gross return that falls short of bonds that do not qualify for grandfathering of course depends also on the magnitudes of supply and demand for the tax-favored bonds. In any case, absence of tax effects for the differential returns on grandfathered and non-grandfathered bonds should suggest that existing loopholes are wide enough to render the current version of the Savings Directive ineffective.

While there has been an extensive discussion of the Savings Directive among public finance economists, the question put forward in the present paper has to the best of our knowledge not been addressed in the literature. Previous discussions of the Savings Directive have focused on the question of whether it is better to have information exchange or a withholding tax (Huizinga and Nielsen 2003) and have discussed under what conditions voluntary information exchange may result (Eggert and Kolmar 2002).

The present paper is partly inspired by the studies that analyze the return differential of tax exempt municipal bonds and taxable state and federal bonds in the U.S. (see for examples

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<sup>4</sup> The exemption is limited to interest income before 31<sup>st</sup> December 2010. Another qualification for exemption from the withholding tax is that there were no further issues of the same security after 1<sup>st</sup> March 2002 (Article 15(1), 2003/48/EC).

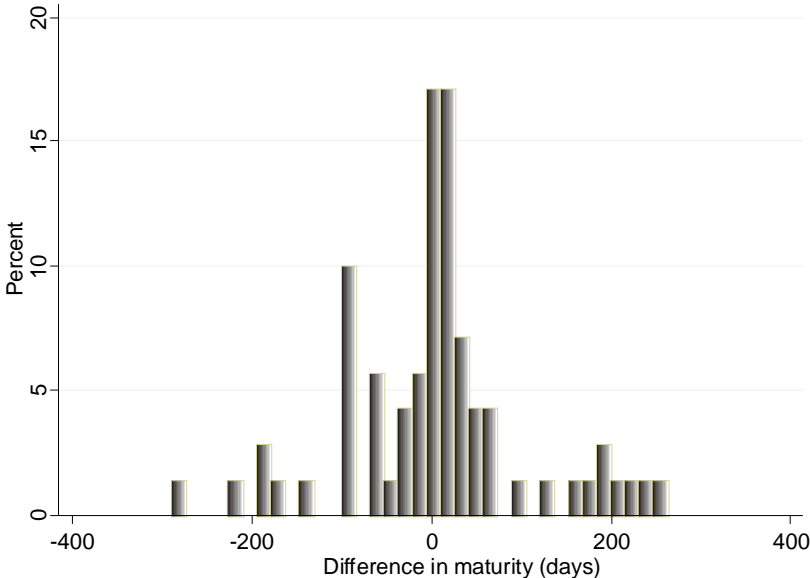
Grinblatt and Titman 2002, Poterba 1989, and Gordon and Malkiel 1981). Due to the fact that the returns of municipal bonds are not subject to tax for US investors, the return of these bonds is empirically found to be smaller than the before tax return of other securities. In the present case, the tax effects may be less pronounced as bonds that fall under the grandfathering rule create a tax benefit to an arguably smaller group of taxpayers, those that are tax dodgers. Unlike in the U.S. case, institutional investors are not affected as the withholding tax (and the information exchange) is limited to the case of personal investors. Essentially, the question of whether the withholding tax is relevant for asset returns is therefore an empirical question.

## II. The Data Set

In collecting our data set we started by considering a huge set of interest bearing securities that have been in circulation in mid-2007. The data set we started with contains all negotiable securities (in total 6,013) that at this date could be ordered via publicly owned banks (Sparkassen) in Germany. This compares to a total of 18,387 securities that were traded in Germany according to Deutsche Börse (2006). Among the 6,013 securities in our data set we identified 1,006 grandfathered bonds denominated in euro. In a next step we constructed pairs of twin bonds that ideally differ only in the fact that one part of each pair is grandfathered (i.e., not subject to the 15% withholding tax rate that according to the Savings Directive must be retained by Austria, Belgium and Luxembourg), while the other is not. While this necessarily implies that one part of each pair was issued earlier than the other one to receive preferential treatment under the grandfathering rule, we made sure that other characteristics of the pairs are comparable. In particular, we imposed the following restrictions. (i) Each pair must have been issued by the same institution or firm. (ii) To involve the same risk characteristics, both securities had to be denominated in the same currency. We decided to restrict our sample to pairs of twins issued in euro as this is the denomination European tax dodgers should have a preference for. (iii) To avoid comparisons of securities with stark

diverging time horizons, difference in the remaining time to maturity (as of July 1<sup>st</sup>, 2007) was not allowed to exceed one year. (iv) Return information on both twins had to be available for at least two quarters prior to the introduction of the withholding rate. (v) Finally, price and return information for all twins had to be available from the Thompson Financial data base. A complete list of the securities in our sample is provided in the Appendix.

*Figure 1: Differences in maturity*



**Annotation:** The figure reports the difference in maturities. A negative difference implies that the remaining maturity of the grandfathered bond is longer.

These restrictions produced a set of 70 twins with 1,246 pairs of quarterly return information. Since securities that qualify for grandfathering are issued prior to March 2001 and we imposed the restriction of similar maturity, we are dependent on issuers who subsequent to the issue of a grandfathered bond have also given out a comparable bond with shorter maturity.

Figure 1 reports the differences in the maturity within twins, by counting the days that the maturity of the grandfathered bond exceeds the maturity of the twin. As can be seen, most differences in maturities lie in a 50 days band and the distribution is rather symmetric. This



suggests that any yield curve effects, which may produce a systematic higher or lower yield for securities with a longer maturity, should not systematically influence the return difference among our pairs of twins.

### III. Evidence on Return Differences

As mentioned in the introduction, if tax evaders happen to be the marginal traders of securities, then we would expect that tax exempt securities trade at a premium and pay a lower pre-tax return. More formally, let  $r^{gf}$  be the pre-tax return of a grandfathered bond and  $r^{tw}$  the return of its taxable twin. Then we would expect that a trader who cannot escape the withholding tax  $t$ , but can evade other taxes is indifferent if

$$(1) \quad (1 - t) r^{tw} = r^{gf}, \text{ or } r^{tw} = r^{gf} / (1 - t) .$$

With a withholding rate of 15% we would have that the return of the taxable twin could be 17.6% =  $[1/(1 - 15\%)] - 1$  higher than that of the grandfathered bond. Clearly, forward looking investors will not only consider the actual withholding tax, but will anticipate future taxes, leading to possible tax capitalization effects well ahead of the actual introduction. This calls for an account of the path that led to the directive and the grandfathering rule.

The first concrete proposals towards a withholding tax on cross-border interest in Europe was formulated in 1989 in Commission proposal COM (89) 60 final, which suggested a minimum withholding rate of 15%, but without mentioning of grandfathering. Upon strong concerns about capital flight, the proposal was withdrawn in favor of COM (98) 295 final of 4<sup>th</sup> June 1998. This revised proposal provided for a choice for member states to either introduce a withholding tax of 20% on cross-border interest paid to private individuals, or to introduce a system of information exchange with other member states. Again, the proposal contained no grandfathering rule for specific securities. In a next step the Commission formulated COM(2001) 400 final of 18<sup>th</sup> July 2001, based on a basic agreement of the Council

of November 2000. It favored the system of information exchange but allowed Austria, Belgium and Luxembourg a transition period of seven years during which they would not participate in information exchange but levy a withholding tax on interest. This revised proposal introduced the idea of grandfathering (i.e., exempting from withholding tax) securities issued before 1<sup>st</sup> March 2001. In the aftermath of this proposal, the introduction of the withholding tax stayed very uncertain, as negotiations in the Council made clear that cooperation by third-countries outside the EU was crucial to buy the consent of several member states.<sup>5</sup> The legislated directive of 3<sup>rd</sup> June 2003 (Council Directive 2003/48/EC) introduced 1<sup>st</sup> January 2005 as the date for the withholding tax of 15%, but had the same proviso as the previous proposal: without ratification of similar agreements with Switzerland, Liechtenstein, San Marino, Monaco and Andorra the introduction of the withholding tax in Austria, Belgium and Luxembourg was not in sight. In principle, the same proviso continued to hold after directive 2004/587/EC had pushed back the introduction of the withholding tax to 1<sup>st</sup> July 2005, but in a press release of 19<sup>th</sup> July 2004 the Commission announced that an agreement with the required third-countries has been reached on all matters of substance.

From this historical account it is not entirely clear at what time the markets, if at all, should have priced in a differential between grandfathered and non-grandfathered bonds. In any case, if tax dishonest investors are marginal, then arbitrage considerations suggest that at least after July 2005 the pre-tax return of grandfathered bonds should have fallen below that of comparable other bonds.

Table 1 and Figure 2 give summary information on the empirical yield differences in our sample. As reported in Table 1, the overall mean return of grandfathered bonds, measured by the redemption yield, in our sample was 3.698%.<sup>6</sup> The mean yield for the twin securities was only 2.5 basis points lower and the difference between yields did not change for the returns from July 2005 onwards, when the Savings Directive was fully effective. Figure 2

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<sup>5</sup> See Rehm (2003) for a detailed account of the history of the Savings Directive.

<sup>6</sup> Based on the security price in the respective quarter, the redemption yield calculates the return of an investor who buys the security and holds it until maturity.

gives a more detailed picture over time by plotting the mean, the median, the 25<sup>th</sup> centile and the 75<sup>th</sup> centile for the return difference between the twin and the grandfathered bond. The number of pairs that enter in the calculation at each quarter is plotted against the right hand scale. A positive difference implies that the return was lower for the grandfathered security. Such a lower pre-tax return for the grandfathered security would be commensurate with a preference of investors for the tax advantage granted by the Savings Directive. However, if anything, the figure suggests that the difference in returns has decreased over time, which is the contrary of what we would expect when tax dodgers were the marginal investors driving the price differential between grandfathered and non-grandfathered bonds. The overall levels of return do not provide any evidence for capital market effects of the Savings Directive.

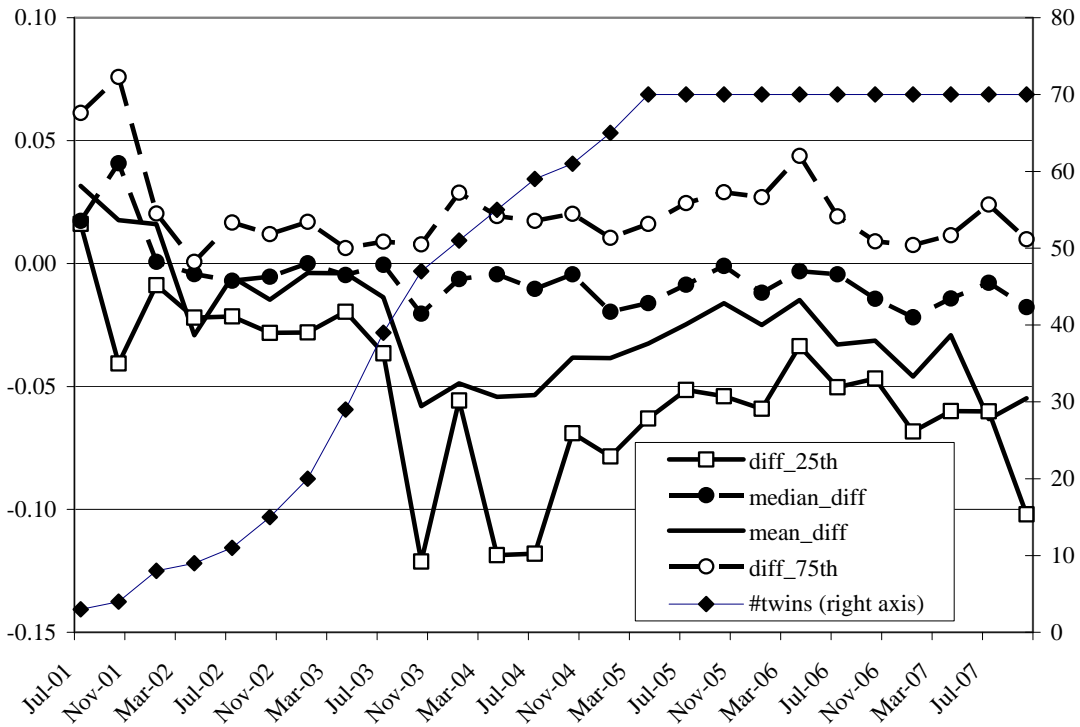
Something that has increased over time is the variation in the return spread as illustrated by Figure 3. While the standard deviation in the return spread was 6 basis points for the period July 2001 through July 2003, it increased to 16 basis points for the period October 2003 through October 2007 and the increase is statistically significant. This seems to suggest that the legislation of the Savings Directive may have led to increased trade and thereby to an increased volatility in the return differences between grandfathered and non-grandfathered bonds. The increase in the standard deviation jumped up shortly after legislation of the Council Directive 2003/48/EC in summer 2003. In the following econometric analysis we will more closely look at whether there are systematic differences in the relative return of grandfathered securities and their respective twins before June 2003 and thereafter by essentially applying a difference in difference approach. But rather than using the difference in returns for pairs of twins as the left hand variable, we use the ratio of returns, which reflects equation (1) above.

Table 1: Summary returns statistics for 70 pairs in percent

Variable	Observations	mean	median	min	max
quarterly return, grandfathered bonds	1246	3.698	3.742	2.121	10.093
quarterly return, taxable twin	1246	3.663	3.699	1.903	10.073
$r^{tw} / r^{gf}$	1246	0.991	0.998	0.583	1.395
return, grandfathered bonds, post II/05	700	3.763	3.859	2.121	5.066
quarterly return, taxable twin, post II/05	700	3.730	3.826	1.903	5.077
$r^{tw} / r^{gf}$ , post II/05	700	0.992	0.998	0.583	1.395

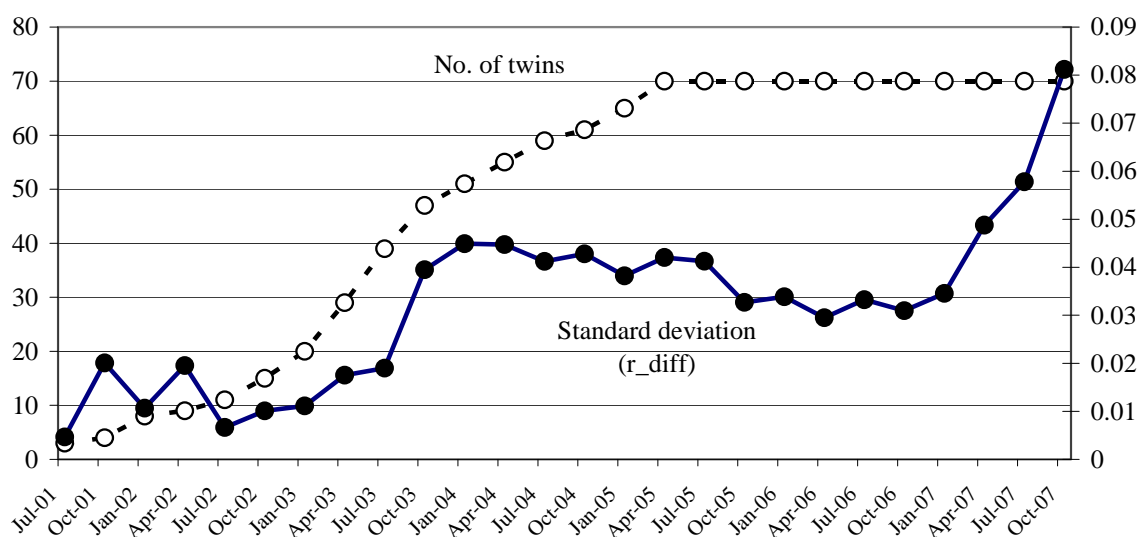
**Annotation:** The table reports the summary statistics on quarterly data of the redemption yield, which equals the internal rate of return if a bond is purchased at the going price and all future cash flows are taken into account.

Figure 2: Return differences between grandfathered bonds and their twins



**Annotation:** For each pair of twins, the variable diff is defined as the pre-tax return (redemption yield) of the non-grandfathered security minus the pre-tax return of the grandfathered security. These differences in returns are plotted against the left scale for the 25<sup>th</sup> centile, the median, the mean, and the 75<sup>th</sup> centile for each quarter. The total number of pairs in each quarter is plotted on the right hand scale.

Figure 3: Standard deviation of return ratio  $r^{tw} / r^{gf}$



**Annotation:** The number of twins is plotted against the left scale and the standard deviation ( $r_{diff} = r^{tw} / r^{gf}$ ) is plotted on the right hand scale.

For the empirical analysis we define three time windows. The dummy *postII05* is marking return observations for July 2005 and thereafter (III/2005–IV2007). Since the announced withholding tax may have triggered anticipation effects we also created a dummy *III03\_II05* for quarterly observations between July 2003 (III/2003) and June 2005 (II/2005). The base periods, for which we presume that there was no anticipation of the withholding tax, are quarters before July 2003, i.e. III/2001 through II/2003.

Column (1) reports results from a simple OLS. While both time dummies for the post legislation periods are significant, they both have the wrong sign and are small in economic terms. The results are very similar in column (2), which reports results that have been derived by using fixed effects for each pair of twins. In both cases, the error terms show a high degree of serial correlation. Therefore, columns (3)–(7) report regressions with inclusion of two lags of the dependent variable.<sup>7</sup> Inclusion of two lagged dependent variables makes the estimated

<sup>7</sup> While lagged dependent variables call for instrumental variable approaches, under rather mild assumptions, the bias in the estimates tends to be small with a long time horizon (see Green 2003). Arellano-Bond-type estimators have not been used because of the insufficient time variation of the exogenous variables, i.e. the dummies for the time windows.

effect of the time window dummies smaller and insignificant. At the same time, it resolves the problem of first order autocorrelation in the errors. We also tried to include a third lag of the endogenous variable, but found this third lag to be insignificant. When we include lagged endogenous variables the F-test also allows to drop the dummies for each pair. The last three regressions therefore drop these dummies and we also use the acceptable restriction that the coefficients for III03\_II05 and post\_II05 are the same. Equations (5)–(7) use the dummy post\_II03, which takes on the value one for observations from July 2003. Equation (6) tests whether the return ratio reacts differently for pairs of twins, depending on whether the emission volume of the grandfathered security is small compared to its taxable twin. If tax evaders are indeed looking for perfect substitutes of taxable securities, then the price reaction may be more pronounced if the supply of grandfathered bonds is small. The relevant variable is constructed as  $\text{Volume}^*d03 = (\text{Total emission of grandfathered bond in euro} / \text{total emission of taxable bond in euro}) * \text{post\_II03}$ . If after legislation of the directive, tax evaders demanded close substitutes, then we should expect that the estimated coefficient of  $\text{Volume}^*d03$  is negative. As reported in equation (6), there is no support for this. Finally, as Figure 2 has shown that our endogenous variable shows some outliers with extreme values up to 1.395 and as low as 0.583, we also tested a robust estimation. Equation (7) reports the results derived by using least absolute values (LAV), a robust regression method which minimizes the sum of the absolute values of the residuals. This method estimates the effects of the explanatory variables on the conditional median of the dependent variable rather than the conditional mean. The results confirm the OLS results and suggest no capital market reactions to the Savings Directive.

Taken together, neither the observed return differences of taxable vs. exempt bonds as reported in Table 1, nor the difference in difference estimates reported in Table 2 are commensurate with an effect of the Savings Directive on bond returns.

Table 2: Estimation results

Variable	(1) OLS	(2) OLS	(3) OLS	(4) OLS	(5) OLS	(6) OLS	(7) LAV
III03_II05	-.011 (0.00)***	-.003 (0.26)	-.002 (0.34)	-.002 (0.29)	---	---	---
post_II05	-.007 (0.00)***	-.001 (0.65)	-.002 (0.32)	-.002 (0.19)	---	---	---
post_II03	---	---	---	---	-.002 (0.30)	-0.002 (0.21)	-.001 (0.33)
r_diff_lag1	---	---	.493 (0.00)***	.430 (0.00)***	.493 (0.00)***	.490 (0.00)***	.588 (0.00)***
r_diff_lag2	---	---	.497 (0.00)***	.508 (0.01)***	.498 (0.00)***	.492 (0.00)***	.332 (0.00)***
Volume*d03	---	---	---	---	---	3.4E-04 (0.28)	2.8E-04 (0.19)
constant	.999 (0.00)***	.984 (0.00)***	0.012 (0.82)	0.061 (0.59)	.012 (0.82)	.019 (0.73)	0.081 (0.00)***
Fixed effects	no	yes	no	yes	no	no	no
F-test FE	---	(0.00)***	---	(0.52)	---	---	---
linear restriction III03_II05 = post_II05	(0.17)	(0.39)	(0.86)	(0.72)	---	---	---
Observations	1246	1246	1106	1106	1106	1106	1106
R2/pseudoR2	0.5%	54%	72%	74%	72%	72%	49%

**Annotation:** Endogenous variable:  $r\_diff = r^{tw} / r^{gf}$ . P-values in brackets are calculated from robust standard errors in the case of OLS regressions, from bootstrap standard errors with 200 repetitions in the case of LAV. \*\*\*, \*\*, \* indicate significance at the 1, 5, and 10 percent level, respectively.

#### IV. Conclusions

The Savings Directive has been celebrated as a major break-through in coordinating taxation in Europe. Against this background, the present paper evaluated the real-world effects of this directive. The directive has left one explicit loophole by providing grandfathering (exemption from withholding tax) for some securities. In this paper we have compared the pre-tax returns of these exempt bonds and comparable taxable bonds. If working around the Savings Directive is difficult for tax evaders in Europe, then investors should be willing to pay a premium for bonds that are exempt from the withholding rate. Conversely, if such a premium is absent, then we may conclude that the supply of existing loopholes (exempt bonds included) is large enough to allow tax evaders to continue evasion at negligible additional cost. The findings of our study are in line with this latter interpretation. This suggests that, at least so far, the Savings Directive is only a minor hassle for European savers looking for ways to work around interest income taxation. This stands in striking contrast to the considerable bureaucratic and political efforts that have been exerted to introduce the measures taken. As a caveat, it should be noted that grandfathering will end at December 31<sup>st</sup>, 2010. At least, this will close the loophole that has acted as a litmus test in the present study.



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*Appendix: Sample of pairs of negotiable securities*

ISIN: Grandfathered	ISIN: Twin	Country	Emitter	Expire date: Grandfathered	Expire date: Twin
ES0413211006	ES0413211063	Argentina	Bank	1-Oct-09	3-Dec-09
DE0002298502	DE0005517700	Germany	Bank	8-Aug-08	11-Jun-08
DE0002131042	DE0001614584	Germany	Bank	2-Jun-10	18-Jun-10
BE0000262684	BE0000298076	Belgium	Government	24-Dec-12	28-Sep-12
BE0000268749	BE0000302118	Belgium	Government	29-Jul-08	28-Sep-08
BE0000282880	BE0000306150	Belgium	Government	28-Mar-15	28-Sep-15
DE0002278058	DE0002278538	Germany	Bank	16-Oct-08	20-Nov-08
DE0001240042	DE0001240174	Germany	Government	28-May-10	2-Jun-10
DE0001240059	DE0001240166	Germany	Government	16-Mar-09	10-Feb-09
DE0001240075	DE0001240182	Germany	Government	24-Jan-11	7-Sep-11
DE0001135168	DE0001135184	Germany	Government	4-Jan-11	4-Jul-11
XS0118237188	XS0168860509	USA	Bank	1-Oct-10	21-May-10
DE0002330677	DE0002738218	Germany	Bank	7-Apr-09	1-Dec-09
DE0002330826	DE0003257135	Germany	Bank	30-Apr-08	1-Apr-08
DE0002330842	DE0003118121	Germany	Bank	12-Mar-10	19-Mar-10
DE0002738200	DE0002738226	Germany	Bank	1-Feb-11	6-Jun-11
DE0002474798	DE000A0A2788	Germany	Bank	4-Mar-09	8-Sep-09
DE0002321155	DE0001196442	Germany	Bank	19-Jun-08	17-Sep-08
DE0002596384	DE000A0DRUN7	Germany	Bank	5-Aug-08	18-Aug-08
FR0000570780	FR0000188690	France	Government	26-Dec-12	25-Oct-12
XS0118728756	XS0173290148	USA	Bank	6-Oct-10	4-Aug-10
XS0124047431	XS0156924051	UK	Bank	5-Feb-13	29-Oct-12
DE0001381531	DE0001381770	Germany	Government	4-Jan-11	10-Jun-11
XS0098738056	XS0147372949	UK	Bank	24-Jun-09	5-May-09
DE0002574142	DE0001697134	Germany	Bank	11-Aug-08	26-Sep-08
DE0002574027	DE000HBE0BQ8	Germany	Bank	22-Jan-08	11-Mar-08
DE0002574241	DE000HBE0BA2	Germany	Bank	19-Jan-09	27-Feb-09
IT0001224309	IT0003804850	Italy	Government	1-May-08	1-Feb-08
IT0001273363	IT0003652077	Italy	Government	1-May-09	15-Apr-09
IT0001448619	IT0003799597	Italy	Government	1-Nov-10	15-Jan-10
DE0002760790	DE0002760915	Germany	Bank	17-Jun-13	4-Jul-13
DE0005881635	DE0001609097	Germany	Bank	18-Oct-07	16-Oct-07
DE0007550857	DE0007627044	Germany	Bank	12-Nov-07	12-Nov-07
DE0003412987	DE0001261386	Germany	Bank	11-Dec-07	15-Dec-07
DE0003036380	DE000A0A3RC8	Germany	Bank	7-Jan-08	17-Dec-07
DE0003892477	DE0003116497	Germany	Bank	14-Jan-08	14-Jan-08
DE0003458998	DE0008087933	Germany	Bank	13-Feb-08	4-Feb-08
DE0003454815	DE000LBW1NL4	Germany	Bank	21-Apr-08	29-Apr-08
DE0003454971	DE0003250882	Germany	Bank	13-May-08	8-May-08
DE0001237758	DE0007153017	Germany	Bank	15-Sep-08	5-Sep-08
DE0003036091	DE0001474351	Germany	Bank	27-Nov-08	28-Nov-08
DE0003035945	DE0002912292	Germany	Bank	27-Nov-08	15-Dec-08
DE0003036604	DE0007627093	Germany	Bank	15-Dec-08	15-Dec-08
DE0001023927	DE0001618809	Germany	Bank	9-Jan-09	21-Jan-09

DE0003037214	DE0006943582	Germany	Bank	4-Mar-09	30-Jan-09
DE0003517132	DE000LBW1PS4	Germany	Bank	14-May-09	3-Jun-09
DE0003519922	DE0007627051	Germany	Bank	4-Dec-09	14-Dec-09
DE0001162691	DE0007935769	Germany	Bank	21-Jan-10	22-Jan-10
DE0001023810	DE0007266793	Germany	Bank	6-Jul-10	30-Jul-10
DE0006276306	DE000A0A24C6	Germany	Bank	14-Feb-11	10-Mar-11
DE0002268778	DE0001663656	Germany	Bank	30-Oct-08	1-Sep-08
DE0002984622	DE0002984895	Germany	Bank	2-Oct-08	7-Jul-08
DE0002985884	DE0002983194	Germany	Bank	6-Oct-08	3-Mar-08
DE0002987575	DE0002983301	Germany	Bank	1-Jul-08	17-Jan-08
DE0002989563	DE0003115689	Germany	Bank	16-May-08	23-May-08
DE0002989753	DE0007266264	Germany	Bank	1-Sep-08	28-Feb-08
DE0002674686	DE0007691503	Germany	Bank	26-Nov-08	22-Dec-08
NL0000102192	NL0000102309	Netherlands	Government	15-Apr-10	15-Jan-10
DE0001590818	DE0001590867	Germany	Government	19-Jan-09	8-Oct-09
DE0003097077	DE0007243750	Germany	Government	6-Dec-10	15-Feb-11
DE0001595585	DE0001469104	Germany	Government	18-Jun-10	30-Jun-10
DE0001595668	DE0001691764	Germany	Government	19-Jan-10	13-Aug-10
DE0001735918	DE0007169963	Germany	Government	22-Jan-08	15-Feb-08
DE0003074589	DE0005520407	Germany	Bank	9-Apr-08	30-Apr-08
DE0003074787	DE0008317629	Germany	Bank	1-Sep-08	30-Sep-08
DE0003071312	DE0001114072	Germany	Bank	22-Dec-08	22-Dec-08
DE0003071916	DE0003077137	Germany	Bank	7-Sep-09	2-Nov-09
DE0001788974	DE0001789030	Germany	Government	22-Nov-10	25-Aug-10
DE0001785640	DE0001786481	Germany	Government	6-Mar-08	16-Apr-08
ES0000012064	ES0000012882	Spain	Government	30-Jul-09	31-Jan-09

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