

Company Focus

2 February 2008 | 9 pages

Oriental Bank of Commerce (ORBC.BO)

Upgrading to Buy: Value, Not Vogue

 Change in opinion
 Rating change
 Target price change
 Estimate change

- Upgrading to Buy** — We are upgrading OBC to Buy (1M) from Hold (2M) on the back of: a) Cheap valuations – the stock trades at 0.9x FY09E BV (20-40% discount to peers); b) Lower interest rate environment – cutting risk free rate to 7.5% (from 8%); and c) Weak operating performance and low returns notwithstanding, OBC is a good bank franchise with strong geographical presence, and operating performance can be reversible in a short-time frame.
- Weak P&L performance, but recoverable** — OBC's P&L has been modest; another quarter running, margins are down 40bp yoy, fee income growth has been tepid, and the provisioning write-back cycle is now probably done. While flux at the top management level has probably contributed – and we are not aware of any meaningful strategic push / course correction that will reverse this near term – the good franchise, strong balance sheet, low cost ratios and modest size should all enable a quick operating turnaround. In sum, the P&L is not attractive – and we are not saying its happening, but it is not a difficult fix.
- Balance sheet is healthy and there is capital** – OBC has a healthy balance sheet; NPLs are generally fine (net NPA 0.7%), and there is adequate capital. In addition, its geography (Delhi and North India), branch network and low cost ratios suggest intrinsic value well exceeds its sub book value multiples.
- Revising target to Rs310 based on EVA** — On lower risk free rates, revised asset quality forecasts, higher yields and industry benchmarks, in part offset by our 20-21% earnings cut over FY08-09E. Valuations also benchmarked against 1.2x FY09E PBV, the lowest amongst our coverage banks.

Buy/Medium Risk	1M
<i>from Hold/Medium Risk</i>	
Price (01 Feb 08)	Rs247.65
Target price	Rs310.00
<i>from Rs285.00</i>	
Expected share price return	25.2%
Expected dividend yield	1.8%
Expected total return	27.0%
Market Cap	Rs62,046M
	US\$1,580M

Price Performance (RIC: ORBC.BO, BB: OBC IN)



Statistical Abstract

Year to	Net Profit	Diluted EPS	EPS growth	P/E	P/B	ROE	Yield
31 Mar	(RsM)	(Rs)	(%)	(x)	(x)	(%)	(%)
2006A	5,572	25.15	-36.4	9.8	1.4	16.4	1.8
2007A	5,808	23.18	-7.8	10.7	1.2	12.2	1.8
2008E	6,112	24.40	5.2	10.2	1.1	11.2	1.8
2009E	7,486	29.88	22.5	8.3	0.9	11.9	1.8
2010E	11,186	44.65	49.4	5.5	0.8	15.5	1.8

Source: Powered by dataCentral

Manish Chowdhary, CFA¹

 +91-22-6631-9853
 manish.chowdhary@citi.com

Aditya Narain, CFA¹

 +91-22-6631-9879
 aditya.narain@citi.com

Himani Shah, CFA¹

himani.shah@citi.com

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

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

¹Citigroup Global Markets India Private Limited

Fiscal year end 31-Mar	2006	2007	2008E	2009E	2010E
Valuation Ratios					
P/E adjusted (x)	9.8	10.7	10.2	8.3	5.5
P/E reported (x)	9.8	10.7	10.2	8.3	5.5
P/BV (x)	1.4	1.2	1.1	0.9	0.8
P/Adjusted BV diluted (x)	1.4	1.2	1.1	0.9	0.8
Dividend yield (%)	1.8	1.8	1.8	1.8	1.8
Per Share Data (Rs)					
EPS adjusted	25.15	23.18	24.40	29.88	44.65
EPS reported	25.15	23.18	24.40	29.88	44.65
BVPS	177.13	204.04	233.15	267.68	307.27
Tangible BVPS	177.13	204.04	233.15	267.68	307.27
Adjusted BVPS diluted	177.13	204.04	233.15	267.68	307.27
DPS	4.50	4.50	4.50	4.50	4.50
Profit & Loss (RsM)					
Net interest income	16,051	16,913	16,353	20,106	24,830
Fees and commissions	2,043	3,032	3,336	3,669	4,036
Other operating Income	3,317	3,083	3,135	3,404	3,711
Total operating income	21,411	23,029	22,824	27,180	32,577
Total operating expenses	-9,659	-9,979	-11,017	-12,412	-13,992
Oper. profit bef. provisions	11,753	13,050	11,808	14,767	18,585
Bad debt provisions	-53	1,187	-128	-1,139	-2,105
Non-operating/exceptionals	-5,967	-6,168	-2,948	-2,934	-500
Pre-tax profit	5,733	8,069	8,732	10,694	15,980
Tax	-161	-2,261	-2,620	-3,208	-4,794
Extraord./Min. Int./Pref. Div.	0	0	0	0	0
Attributable profit	5,572	5,808	6,112	7,486	11,186
Adjusted earnings	5,572	5,808	6,112	7,486	11,186
Growth Rates (%)					
EPS adjusted	-36.4	-7.8	5.2	22.5	49.4
Oper. profit bef. prov.	-5.0	11.0	-9.5	25.1	25.9
Balance Sheet (RsM)					
Total assets	582,043	734,481	879,336	1,021,084	1,172,894
Avg interest earning assets	557,539	654,742	800,347	941,597	1,087,123
Customer loans	356,876	456,001	555,193	652,411	755,157
Gross NPLs	21,163	14,541	14,644	16,696	19,467
Liab. & shar. funds	582,043	734,481	879,336	1,021,084	1,172,894
Total customer deposits	501,975	639,960	776,099	907,609	1,047,727
Reserve for loan losses	21,104	14,616	13,290	12,965	13,401
Shareholders' equity	44,378	51,121	58,413	67,065	76,982
Profitability/Solvency Ratios (%)					
ROE adjusted	16.4	12.2	11.2	11.9	15.5
Net interest margin	2.88	2.58	2.04	2.14	2.28
Cost/income ratio	45.1	43.3	48.3	45.7	43.0
Cash cost/average assets	1.7	1.5	1.4	1.3	1.3
NPLs/customer loans	5.9	3.2	2.6	2.6	2.6
Reserve for loan losses/NPLs	99.7	100.5	90.8	77.7	68.8
Bad debt prov./avg. cust. loans	0.0	-0.3	0.0	0.2	0.3
Loans/deposit ratio	71.1	71.3	71.5	71.9	72.1
Tier 1 capital ratio	11.7	10.4	9.8	9.6	9.6
Total capital ratio	12.5	12.9	11.9	11.4	11.1

For further data queries on Citigroup's full coverage universe please contact CIR Data Services Asia Pacific at CitiResearchDataServices@citigroup.com or +852-2501-2791



Figure 1. Earnings Revision Summary

	Net Profit (Rsm)			EPS (Rs)			DPS (Rs)	
	Old	New	% change	Old	New	% change	Old	New
FY08E	7,817	6,112	-21.8	31.2	24.4	-21.8	4.5	4.5
FY09E	9,612	7,486	-22.1	38.4	29.9	-22.1	4.5	4.5
FY10E	-	11,186	-	-	44.6	-	-	4.5

Source: Citi Investment Research

We have revised our estimates to reflect weak performance for the first nine months of the year.

Figure 2. OBC: 3QFY08 Results – Key Highlights (Rupees Million, Percent)

	3Q08	3Q07	YoY %	2Q08	QoQ%	Citi Investment Research Comments
Interest Income	17,479	13,137	33.0	16,457	6.2	
Interest Expense	(13,456)	(8,924)	50.8	(12,462)	8.0	
Net Interest Income	4,024	4,213	-4.5	3,995	0.7	Margins under pressure again, slightly more than estimated - relative contrast to peers and a stable interest rate environment
Fee-Based Income	690	994	-30.6	928	-25.7	
Other Non-Interest Income	984	336	193.4	497	98.0	
Non Interest Income	1,674	1,330	25.9	1,425	17.4	Above estimates; likely supported by trading gains and recoveries during the quarter
Operating Income	5,697	5,543	2.8	5,420	5.1	
Operating Expenses	(2,730)	(2,476)	10.2	(2,698)	1.2	Costs remain fairly stable and largely in line with peers
Pre-Provision Profit	2,967	3,067	-3.2	2,722	9.0	Muted operating performance - reflecting contractions in margins and a lacklustre core fee performance
Charges for Bad Debts	(465)	224	NM	283	NM	
Other Operating Items	207	(305)	NM	(92)	NM	
Operating Profit	2,709	2,986	-9.3	2,913	-7.0	
Pre-Tax Profit	2,709	2,986	-9.3	2,913	-7.0	
Tax	(713)	(550)	29.7	(551)	29.4	
Extraordinary Items	(612)	(612)	-0.1	(612)	-0.1	
Net Profit	1,385	1,824	-24.1	1,750	-20.9	13% lower than estimates - a weak quarter with asset quality improvement (from a relatively high base) the only silver lining
EPS	5.53	8.22	-32.8	6.98	-20.9	
Customer Loans	512,240	414,898	23.5	468,650	9.3	Strong growth quarter, yoy growth is now slightly ahead of industry
Customer Deposits	741,800	607,060	22.2	691,780	7.2	Deposit accretion meaningfully lower than industry and has kept pressure on margins
AIEA	685,277	622,979	10.0	652,182	5.1	
AIBL	759,094	643,300	18.0		NM	
Total Assets	788,804	685,916	15.0	788,804	0.0	
Avg Assets	788,804	702,083	12.4	772,376	2.1	
Non-Performing Loans (NPL)	13,999	17,523	-20.1	13,892	0.8	Strong reductions in NPLs - has been the key focus area for the bank over the last year
Loan Loss Reserves (LLR)	(10,558)	(15,732)	-32.9	(10,954)	-3.6	
Shareholders' Funds	54,989	43,093	27.6	51,724	6.3	
Book Value Per Share	219.44	172	27.6	206	6.3	
Key Ratios (%)	3Q08	3Q07	Bps Δ YoY	2Q08	Bps Δ QoQ	Citi Investment Research Comments
ROAA (annualized)	0.70	1.06	-36	0.89	-19	Profitability continues to decline, amongst the lowest relative to peers
ROAE (annualized)	10.07	16.93	-686	13.53	-346	
Net Interest Margin (bps)	235	271	-36	245	-10	Continuous decline and significantly below peers and its own historical levels
Fee Inc/Operating Income	12.1	17.9	-583	17.1	-502	
Other Non-Interest Inc/Op Inc	29.4	24.0	539	26.3	308	
Op. Cost/ Operating Income	47.9	44.7	324	49.8	-186	
Loan-to-Deposit Ratio (LDR)	69.1	68.3	71	67.7	131	Some headroom remain for an acceleration in loan growth for 4Q
NPL/Loan Ratio	2.7	4.2	-149	2.96	-23	
LLR/NPL Ratio	75	90	-1,436	79	-343	Coverage levels have declined though NPLs have come off meaningfully

Source: Company Reports and Citi Investment Research

Oriental Bank of Commerce

Company description

Oriental Bank of Commerce was established in 1943 and nationalized in the second round of nationalization in 1980. The bank is headquartered in Delhi, and the government holds 51% of the bank's equity. OBC is a medium-sized bank with a share of about 2% in deposits and advances of the Indian banking system. OBC has a domestic network of 1,400 branches and extension counters.

Investment strategy

We rate OBC as a Buy/Medium Risk (1M) due to: 1) Relatively cheap valuations – current valuations are at a 30-40% discount to peers and are lowest amongst our coverage banks; 2) While margins and profitability are low – and we are not making the call that there is strategic shift / course correction near term – but it can be fixed provided stability at top management level and consistency in effort and direction; 3) Basic business and franchise remains solid: the asset book is clean and OBC's geographic concentration in North India is an advantage. We believe the intrinsic / franchise value of its branches well exceeds its sub 1x BV multiples and will be a good consolidation play; 4) We believe the P&L / operating performance is levered to a lower interest rate environment, due to its higher share of term deposits and low cost ratios and can be turned around quickly; and 5) A modest sized balance sheet and lean operating structure can be aggressively turned around, supporting higher profitability and valuations, in our view.

Valuation

Our target price of Rs310 is based on our EVA methodology. We assume a risk-free rate of 7.5% and a beta of 1. Our loan loss expectation is 75bps, in line with the average for government banks. We have revised upwards asset quality forecasts and yields assumptions to reflect strong recoveries and the current interest rate environment.

We are also benchmarking our target price against 1.2x FY09E P/BV (from 1.3x earlier to reflect lower profitability and margins versus peers), the lowest amongst our coverage banks, which translates into a valuation of Rs321. We believe a valuation discount to peer banks is justified due to the quality and structure of the businesses and given pressures on operating profitability, and franchise issues on the funding front. We prefer to use EVA as our primary methodology, as we believe it adjusts well for the relatively dynamic cost of capital and captures well the long-term value of the business.

Risks

We rate OBC as Medium Risk, as implied by our quantitative risk-rating system, which tracks 260-day share price volatility and based on its business profile. Its NPLs are low, operating profitability is high and management has some gains as a cushion for its bond portfolio. The risks to our target price for OBC lie in its relatively small size, new top management team, and more negative surprises from its recently consummated acquisition. The small size of the bank suggests that a few mistakes or individuals could hurt what we believe is a safe and high-quality balance sheet. In addition, a sharp increase in interest rates could erode the bond portfolio and raise deposit mobilization costs.

Appendix A-1

Analyst Certification

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

IMPORTANT DISCLOSURES

Oriental Bank of Commerce (ORBC.BO) Ratings and Target Price History - Fundamental Research

Analyst: Manish Chowdhary, CFA (covered since September 7 2006)



Within the past 12 months, Citigroup Global Markets Inc. or its affiliates has acted as manager or co-manager of an offering of securities of Oriental Bank of Commerce.

Citigroup Global Markets Inc. or its affiliates has received compensation for investment banking services provided within the past 12 months from Oriental Bank of Commerce.

Citigroup Global Markets Inc. or its affiliates expects to receive or intends to seek, within the next three months, compensation for investment banking services from Oriental Bank of Commerce.

Citigroup Global Markets Inc. or an affiliate received compensation for products and services other than investment banking services from Oriental Bank of Commerce in the past 12 months.

Citigroup Global Markets Inc. currently has, or had within the past 12 months, the following company(ies) as investment banking client(s): Oriental Bank of Commerce.

Citigroup Global Markets Inc. currently has, or had within the past 12 months, the following company(ies) as clients, and the services provided were non-investment-banking, securities-related: Oriental Bank of Commerce.

Citigroup Global Markets Inc. currently has, or had within the past 12 months, the following company(ies) as clients, and the services provided were non-investment-banking, non-securities-related: Oriental Bank of Commerce.

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

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

Citi Investment Research Ratings Distribution

Data current as of 31 December 2007

	Buy	Hold	Sell
Citi Investment Research Global Fundamental Coverage (3421)	50%	37%	12%
% of companies in each rating category that are investment banking clients	52%	53%	40%

Guide to Fundamental Research Investment Ratings:

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

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

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

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

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

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

OTHER DISCLOSURES

The subject company's share price set out on the front page of this Product is quoted as at 01 February 2008 04:00 PM on the issuer's primary market.

For securities recommended in the Product in which the Firm is not a market maker, the Firm is a liquidity provider in the issuers' financial instruments and may act as principal in connection with such transactions. The Firm is a regular issuer of traded financial instruments linked to securities that may have been recommended in the Product. The Firm regularly trades in the securities of the subject company(ies) discussed in the Product. The Firm may engage in securities transactions in a manner inconsistent with the Product and, with respect to securities covered by the Product, will buy or sell from customers on a principal basis.

Securities recommended, offered, or sold by the Firm: (i) are not insured by the Federal Deposit Insurance Corporation; (ii) are not deposits or other obligations of any insured depository institution (including Citibank); and (iii) are subject to investment risks, including the possible loss of the principal amount invested. Although information has been obtained from and is based upon sources that the Firm believes to be reliable, we do not guarantee its accuracy and it may be incomplete and condensed. Note, however, that the Firm has taken all reasonable steps to determine the accuracy and completeness of the disclosures made in the Important Disclosures section of the Product. The Firm's research department has received assistance from the subject company(ies) referred to in this Product including, but not limited to, discussions with management of the subject company(ies). Firm policy prohibits research analysts from sending draft research to subject companies. However, it should be presumed that the author of the Product has had discussions with the subject company to ensure factual accuracy prior to publication. All opinions, projections and estimates constitute the judgment of the author as of the date of the Product and these, plus any other information contained in the Product, are subject to change without notice. Prices and availability of financial instruments also are subject to change without notice. Notwithstanding other departments within the Firm advising the companies discussed in this Product, information obtained in such role is not used in the preparation of the Product. Although Citi Investment Research does not set a predetermined frequency for publication, if the Product is a fundamental research report, it is the intention of Citi Investment Research to provide research coverage of the/those issuer(s) mentioned therein, including in response to news affecting this issuer, subject to applicable quiet periods and capacity constraints. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security. Any decision to purchase securities mentioned in the Product must take into account existing public information on such security or any registered prospectus.

Investing in non-U.S. securities, including ADRs, may entail certain risks. The securities of non-U.S. issuers may not be registered with, nor be subject to the reporting requirements of the U.S. Securities and Exchange Commission. There may be limited information available on foreign securities. Foreign companies are generally not subject to uniform audit and reporting standards, practices and requirements comparable to those in the U.S. Securities of some foreign companies may be less liquid and their prices more volatile than securities of comparable U.S. companies. In addition, exchange rate movements may have an adverse effect on the value of an investment in a foreign stock and its corresponding dividend payment for U.S. investors. Net dividends to ADR investors are estimated, using withholding tax rates conventions, deemed accurate, but investors are urged to consult their tax advisor for exact dividend computations. Investors who have received the Product from the Firm may be prohibited in certain states or other jurisdictions from purchasing securities mentioned in the Product from the Firm. Please ask your Financial Consultant for additional details. Citigroup Global Markets Inc. takes responsibility for the Product in the United States. Any orders by US investors resulting from the information contained in the Product may be placed only through Citigroup Global Markets Inc.

The Citigroup legal entity that takes responsibility for the production of the Product is the legal entity which the first named author is employed by. The Product is made available in Australia to wholesale clients through Citigroup Global Markets Australia Pty Ltd. (ABN 64 003 114 832 and AFSL No. 240992) and to retail clients through Citi Smith Barney Pty Ltd. (ABN 19 009 145 555 and AFSL No. 240813), Participants of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. The Product is made available in Australia to Private Banking wholesale clients through Citigroup Pty Limited (ABN 88 004 325 080 and AFSL 238098). Citigroup Pty Limited provides all financial product advice to Australian Private Banking wholesale clients through bankers and relationship managers. If there is any doubt about the suitability of investments held in Citigroup Private Bank accounts, investors should contact the Citigroup Private Bank in Australia. Citigroup companies may compensate affiliates and their representatives for providing products and services to clients. The Product is made available in Brazil by Citigroup Global Markets Brasil - CCTVM SA, which is regulated by CVM - Comissão de Valores Mobiliários, BACEN - Brazilian Central Bank, APIMEC - Associação dos Analistas e Profissionais de Investimento do Mercado de Capitais and ANBID - Associação Nacional dos Bancos de Investimento. Av. Paulista, 1111 - 11º andar - CEP. 01311920 - São Paulo - SP. If the Product is being made available in certain provinces of Canada by Citigroup Global Markets (Canada)

Inc. ("CGM Canada"), CGM Canada has approved the Product. Citigroup Place, 123 Front Street West, Suite 1100, Toronto, Ontario M5J 2M3. The Product may not be distributed to private clients in Germany. The Product is distributed in Germany by Citigroup Global Markets Deutschland AG & Co. KGaA, which is regulated by Bundesanstalt fuer Finanzdienstleistungsaufsicht (BaFin). Frankfurt am Main, Reuterweg 16, 60323 Frankfurt am Main. If the Product is made available in Hong Kong by, or on behalf of, Citigroup Global Markets Asia Ltd., it is attributable to Citigroup Global Markets Asia Ltd., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. Citigroup Global Markets Asia Ltd. is regulated by Hong Kong Securities and Futures Commission. If the Product is made available in Hong Kong by The Citigroup Private Bank to its clients, it is attributable to Citibank N.A., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. The Citigroup Private Bank and Citibank N.A. is regulated by the Hong Kong Monetary Authority. The Product is made available in India by Citigroup Global Markets India Private Limited, which is regulated by Securities and Exchange Board of India. Bakhtawar, Nariman Point, Mumbai 400-021. The Product is made available in Indonesia through PT Citigroup Securities Indonesia. 5/F, Citibank Tower, Bapindo Plaza, Jl. Jend. Sudirman Kav. 54-55, Jakarta 12190. Neither this Product nor any copy hereof may be distributed in Indonesia or to any Indonesian citizens wherever they are domiciled or to Indonesian residents except in compliance with applicable capital market laws and regulations. This Product is not an offer of securities in Indonesia. The securities referred to in this Product have not been registered with the Capital Market and Financial Institutions Supervisory Agency (BAPEPAM-LK) pursuant to relevant capital market laws and regulations, and may not be offered or sold within the territory of the Republic of Indonesia or to Indonesian citizens through a public offering or in circumstances which constitute an offer within the meaning of the Indonesian capital market laws and regulations. If the Product was prepared by Citi Investment Research and distributed in Japan by Nikko Citigroup Limited ("NCL"), it is being so distributed under license. If the Product was prepared by NCL and distributed by Nikko Cordial Securities Inc. or Citigroup Global Markets Inc. it is being so distributed under license. NCL is regulated by Financial Services Agency, Securities and Exchange Surveillance Commission, Japan Securities Dealers Association, Tokyo Stock Exchange and Osaka Securities Exchange. Shin-Marunouchi Building, 1-5-1 Marunouchi, Chiyoda-ku, Tokyo 100-6520 Japan. In the event that an error is found in an NCL research report, a revised version will be posted on Citi Investment Research's Global Equities Online (GEO) website. If you have questions regarding GEO, please call (81 3) 6270-3019 for help. The Product is made available in Korea by Citigroup Global Markets Korea Securities Ltd., which is regulated by Financial Supervisory Commission and the Financial Supervisory Service. Hungkuk Life Insurance Building, 226 Shinmunno 1-GA, Jongno-Gu, Seoul, 110-061. The Product is made available in Malaysia by Citigroup Global Markets Malaysia Sdn Bhd, which is regulated by Malaysia Securities Commission. Menara Citibank, 165 Jalan Ampang, Kuala Lumpur, 50450. The Product is made available in Mexico by Acciones y Valores Banamex, S.A. De C. V., Casa de Bolsa, which is regulated by Comision Nacional Bancaria y de Valores. Reforma 398, Col. Juarez, 06600 Mexico, D.F. In New Zealand the Product is made available through Citigroup Global Markets New Zealand Ltd. (Company Number 604457), a Participant of the New Zealand Exchange Limited and regulated by the New Zealand Securities Commission. Level 19, Mobile on the Park, 157 Lambton Quay, Wellington. The Product is made available in Poland by Dom Maklerski Banku Handlowego SA an indirect subsidiary of Citigroup Inc., which is regulated by Komisja Papierów Wartościowych i Giełd. Bank Handlowy w Warszawie S.A. ul. Senatorska 16, 00-923 Warszawa. The Product is made available in the Russian Federation through ZAO Citibank, which is licensed to carry out banking activities in the Russian Federation in accordance with the general banking license issued by the Central Bank of the Russian Federation and brokerage activities in accordance with the license issued by the Federal Service for Financial Markets. Neither the Product nor any information contained in the Product shall be considered as advertising the securities mentioned in this report within the territory of the Russian Federation or outside the Russian Federation. The Product does not constitute an appraisal within the meaning of the Federal Law of the Russian Federation of 29 July 1998 No. 135-FZ (as amended) On Appraisal Activities in the Russian Federation. 8-10 Gasheka Street, 125047 Moscow. The Product is made available in Singapore through Citigroup Global Markets Singapore Pte. Ltd., a Capital Markets Services Licence holder, and regulated by Monetary Authority of Singapore. 1 Temasek Avenue, #39-02 Millenia Tower, Singapore 039192. The Product is made available by The Citigroup Private Bank in Singapore through Citibank, N.A., Singapore branch, a licensed bank in Singapore that is regulated by Monetary Authority of Singapore. Citigroup Global Markets (Pty) Ltd. is incorporated in the Republic of South Africa (company registration number 2000/025866/07) and its registered office is at 145 West Street, Sandton, 2196, Saxonwold. Citigroup Global Markets (Pty) Ltd. is regulated by JSE Securities Exchange South Africa, South African Reserve Bank and the Financial Services Board. The investments and services contained herein are not available to private customers in South Africa. The Product is made available in Taiwan through Citigroup Global Markets Inc. (Taipei Branch), which is regulated by Securities & Futures Bureau. No portion of the report may be reproduced or quoted in Taiwan by the press or any other person. No. 8 Manhattan Building, Hsin Yi Road, Section 5, Taipei 100, Taiwan. The Product is made available in Thailand through Citicorp Securities (Thailand) Ltd., which is regulated by the Securities and Exchange Commission of Thailand. 18/F, 22/F and 29/F, 82 North Sathorn Road, Silom, Bangrak, Bangkok 10500, Thailand. The Product is made available in United Kingdom by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. This material may relate to investments or services of a person outside of the UK or to other matters which are not regulated by the FSA and further details as to where this may be the case are available upon request in respect of this material. Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. The Product is made available in United States by Citigroup Global Markets Inc, which is regulated by NASD, NYSE and the US Securities and Exchange Commission. 388 Greenwich Street, New York, NY 10013. Unless specified to the contrary, within EU Member States, the Product is made available by Citigroup Global Markets Limited, which is regulated by Financial Services Authority. Many European regulators require that a firm must establish, implement and make available a policy for managing conflicts of interest arising as a result of publication or distribution of investment research. The policy applicable to Citi Investment Research's Products can be found at www.citigroupgeo.com. Compensation of equity research analysts is determined by equity research management and Citigroup's senior management and is not linked to specific transactions or recommendations. The Product may have been distributed simultaneously, in multiple formats, to the Firm's worldwide institutional and retail customers. The Product is not to be construed as providing investment services in any jurisdiction where the provision of such services would not be permitted. Subject to the nature and contents of the Product, the investments described therein are subject to fluctuations in price and/or value and investors may get back less than originally invested. Certain high-volatility investments can be subject to sudden and large falls in value that could equal or exceed the amount invested. Certain investments contained in the Product may have tax implications for private customers whereby levels and basis of taxation may be subject to change. If in doubt, investors should seek advice from a tax adviser. The Product does not purport to identify the nature of the specific market or other risks associated with a particular transaction. Advice in the Product is general and should not be construed as personal advice given it has been prepared without taking account of the objectives, financial situation or needs of any particular investor. Accordingly, investors should, before acting on the advice, consider the appropriateness of the advice, having regard to their objectives, financial situation and needs. Prior to acquiring any financial product, it is the client's responsibility to obtain the relevant offer document for the product and consider it before making a decision as to whether to purchase the product.

© 2008 Citigroup Global Markets Inc. (© Nikko Citigroup Limited, if this Product was prepared by it). Citi Investment Research is a division and service mark of Citigroup Global Markets Inc. and its affiliates and is used and registered throughout the world. Citi and Citi with Arc Design are trademarks and service marks of Citigroup Inc and its affiliates and are used and registered throughout the world. Nikko is a registered trademark of Nikko Cordial Corporation. All rights reserved. Any unauthorized use, duplication, redistribution or disclosure is prohibited by law and will result in prosecution. The information contained in the Product is intended solely for the recipient and may not be further distributed by the recipient. The Firm accepts no liability whatsoever for the actions of third parties. The Product may provide the addresses of, or contain hyperlinks to, websites. Except to the extent to which the Product refers to website material of the Firm, the Firm has not reviewed the linked site. Equally, except to the extent to which the Product refers to website material of the Firm, the Firm takes no responsibility for, and makes no representations or warranties whatsoever as to, the data and information contained therein. Such address or hyperlink (including addresses or hyperlinks to website material of the Firm) is provided solely for your convenience and information and the content of the linked site does not in anyway form part of this document. Accessing such website or following such link through the Product or the website of the Firm shall be at your own risk and the Firm shall have no liability arising out of, or in connection with, any such referenced website.

Oriental Bank of Commerce (ORBC.BO)
2 February 2008

ADDITIONAL INFORMATION IS AVAILABLE UPON REQUEST
