

## US Economics Analyst

## The Fed's New Framework

- The Federal Reserve concluded its framework review last Thursday at the annual Jackson Hole Symposium with the adoption of flexible average inflation targeting (AIT). Going forward, the FOMC will aim for inflation moderately above 2 percent following periods when inflation has run persistently below 2 percent in order to average 2 percent over time.
- We see two straightforward interpretations of AIT as a modification to a standard Taylor rule reaction function. The first would temporarily raise the inflation target in the policy rule, say to 2¼-2½%, when average inflation over some trailing window falls short of 2%. The second would add the cumulative inflation shortfall over some trailing window, perhaps starting in a recession, as an additional term in the reaction function.
- To explore what the new framework means for monetary policy and the economy, we use the Fed's macroeconomic model, FRB/US, to run simulations that compare AIT policies with the old framework. We simulate these policies under current conditions using the baseline economic trajectory in FRB/US, which initially follows the FOMC's June Summary of Economics Projections.
- We draw three main conclusions. First, AIT rules appear roughly consistent with our forecast of liftoff around early 2025. Second, moderate AIT policies generate a moderately lower funds rate path and slightly higher inflation and lower unemployment than the old framework, but return average inflation to 2% very slowly. Third, an aggressive AIT policy with a 10-year lookback window generates a much lower funds rate path and somewhat larger economic effects, and returns average inflation to 2% in a little over a decade. These conclusions are sensitive to the baseline economic trajectory and the model's assumptions.
- Our analysis also highlights some limitations of the new framework. Realistic macroeconomic models like FRB/US imply that when the policy rate is at the effective lower bound, lower-for-longer policies like AIT make only a limited incremental contribution to fighting recessions. Even with respect to their more limited ambition of stabilizing average inflation, AIT rules would likely require a quite long expansion to return average inflation to 2%, at least if the Phillips curve remains fairly flat.

**Jan Hatzius**

+1(212)902-0394 | jan.hatzius@gs.com  
Goldman Sachs & Co. LLC

**Alec Phillips**

+1(202)637-3746 | alec.phillips@gs.com  
Goldman Sachs & Co. LLC

**David Mericle**

+1(212)357-2619 | david.mericle@gs.com  
Goldman Sachs & Co. LLC

**Spencer Hill, CFA**

+1(212)357-7621 | spencer.hill@gs.com  
Goldman Sachs & Co. LLC

**Daan Struyven**

+1(212)357-4172 | daan.struyven@gs.com  
Goldman Sachs & Co. LLC

**David Choi**

+1(212)357-6224 | david.choi@gs.com  
Goldman Sachs & Co. LLC

**Joseph Briggs**

+1(212)902-2163 | joseph.briggs@gs.com  
Goldman Sachs & Co. LLC

**Blake Taylor**

+1(202)637-3756 | blake.taylor@gs.com  
Goldman Sachs & Co. LLC

**Ronnie Walker**

+1(917)343-4543 | ronnie.walker@gs.com  
Goldman Sachs & Co. LLC

**Laura Nicolae**

+1(917)343-6594 | laura.nicolae@gs.com  
Goldman Sachs & Co. LLC

## The Fed's New Framework

The FOMC concluded its framework review last Thursday at the annual Jackson Hole Economic Policy Symposium with a speech from Chair Powell and a revised Statement on Longer-Run Goals and Monetary Policy Strategy. The main outcome was the adoption of average inflation targeting.

Specifically, the FOMC now “seeks to achieve inflation that averages 2 percent over time, and therefore judges that, following periods when inflation has been running persistently below 2 percent, appropriate monetary policy will likely aim to achieve inflation moderately above 2 percent for some time.” This is a departure from the previous “let bygones be bygones” approach, though Powell emphasized that the FOMC will remain “flexible” and will not be tied to a particular mathematical formula.

The FOMC also noted that it will now respond only to “shortfalls” of employment from its maximum level, rather than to all “deviations” above or below the maximum level. This asymmetric approach to the employment side of the mandate means that an unemployment rate below the estimated longer-run rate is not a sufficient reason to tighten policy. This is a departure from the previous approach of sometimes tightening preemptively in response to concern about potential labor market overheating.

The framework review process had two additional sections, monetary policy tools and monetary policy communication practices, but neither Powell’s speech nor the revised statement noted meaningful changes in these areas. We take this to mean that there has been no official upgrade to the status of yield caps and targets (YCT), leaving that potential new tool neither rejected nor formally adopted for the time being. The September minutes might shed further light on the FOMC’s latest thinking.

Wrapping up the framework review opens the door to eventually changing the forward guidance and asset purchase program. We continue to expect the FOMC to adopt outcome-based forward guidance that delays liftoff until the economy achieves both full employment and 2% inflation. We also continue to expect the FOMC to transition to a traditional asset purchase program by guiding toward an expectation that tapering will not begin until roughly a year before liftoff, describing the purpose of asset purchases as easing financial conditions and supporting the recovery rather than supporting market function, and tilting the composition of purchases toward longer maturities.

### Two Interpretations of Flexible Average Inflation Targeting

What will the changes to the Fed’s framework mean in practice for monetary policy? It is helpful to think of the changes as modifications to an inertial “balanced approach” Taylor rule reaction function,

$$i = b * i_{-1} + (1-b) * [r^* + \pi + 0.5 * (\pi - \pi^*) - 2 * (u - u^*)],$$

where  $i$  is the nominal policy rate,  $i_{-1}$  is the lagged policy rate,  $b$  is the degree of inertia between 0 and 1,  $r^*$  is the real neutral rate,  $\pi$  is the current year-on-year inflation rate,  $\pi^*$  is the inflation target,  $u$  is the unemployment rate, and  $u^*$  is the longer-run

unemployment rate.

We first address the new asymmetric approach to the employment side of the mandate by modifying the rule so that it does not call for tighter policy in response to a low unemployment rate:

$$i = b * i_{-1} + (1-b) * [r^* + \pi + 0.5 * (\pi - \pi^*) - 2 * \max(0, u - u^*)]$$

We next consider two possible interpretations of average inflation targeting. We consider only asymmetric AIT policies that ease policy in response to past low inflation but do not tighten policy in response to past high inflation because this seems most consistent with policymakers' intentions.

The first AIT rule raises the inflation target temporarily when inflation has persistently run below 2%. For example, the target might rise to, say, 2.375%—the middle of the 2.25-2.5% range that Fed officials appear comfortable with—when the trailing 5-year average inflation rate is below 2%:

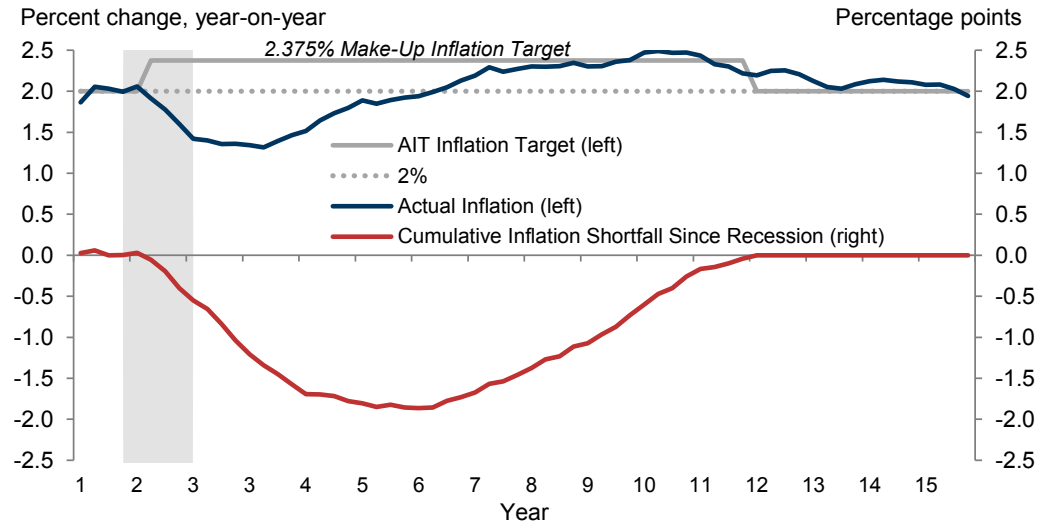
#### AIT Rule #1

$$i = b * i_{-1} + (1-b) * [r^* + \pi + 0.5 * (\pi - 2) - 2 * \max(0, u - u^*)] \text{ if 5-year average inflation } \geq 2\%$$

$$i = b * i_{-1} + (1-b) * [r^* + \pi + 0.5 * (\pi - 2.375) - 2 * \max(0, u - u^*)] \text{ if 5-year average inflation } < 2\%$$

Exhibit 1 illustrates this approach graphically. In this example, when a recession hits, inflation (the blue line) begins to decline and remains low for several years, resulting in a growing cumulative inflation shortfall (the red line). This triggers a temporary increase in the inflation target from 2% to 2.375% (the solid grey line), resulting in easier monetary policy as shown above. The cumulative shortfall begins to shrink when inflation rises above 2%, and once it returns to zero, the inflation target resets to 2%.

**Exhibit 1: One Interpretation of AIT Would Temporarily Set a Higher Make-Up Target When Inflation Has Run Below 2% on Average**



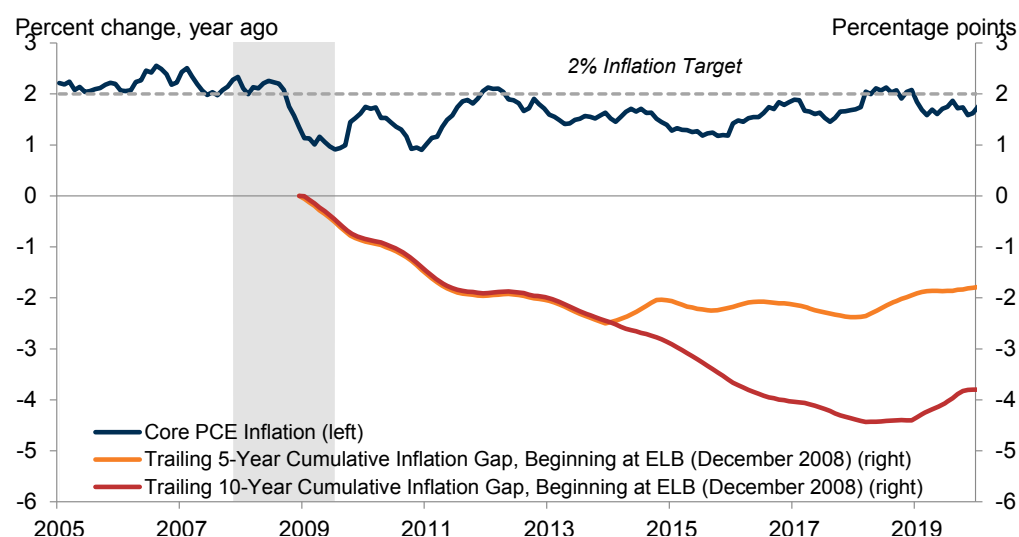
Source: Goldman Sachs Global Investment Research

The second AIT rule instead adds the cumulative inflation shortfall, perhaps since the start of the recession, as an additional term to the policy rule:

#### AIT Rule #2

$$i = b * i_{-1} + (1-b) * [r^* + \pi + 0.5 * (\pi - 2) - 2 * \max(0, u - u^*) + w * \max(0, \text{cumulative } \pi \text{ gap over last } T \text{ years})],$$

where  $w$  is the weight on the cumulative inflation gap over a lookback window of  $T$  years. A larger cumulative inflation gap, a larger weight on the gap, and a longer lookback window would mean easier policy. The cumulative inflation shortfall was substantial in the last cycle, as shown in Exhibit 2.

**Exhibit 2: Another Interpretation of AIT Would Add the Cumulative Inflation Shortfall to the Policy Rule**

Source: Department of Commerce, Goldman Sachs Global Investment Research

## What Average Inflation Targeting Means for Monetary Policy and the Economy

To explore what AIT will mean for monetary policy and the economy in the current cycle, we use the Fed's FRB/US model to simulate AIT policies.<sup>1</sup> We use the most recent update of FRB/US, in which the baseline trajectory of the economy follows the FOMC's June Summary of Economics Projections—which are close to our forecasts—through 2022 and then evolves according to the model's logic thereafter.<sup>2</sup>

Our simulations compare a baseline policy meant to capture the old framework—the inertial balanced approach rule discussed at the start of the last section—with three AIT policies. AIT 1 (the green line in the charts below) uses a 2.375% make-up target when 5-year average inflation is below 2%, AIT 2 (orange) responds to the cumulative inflation shortfall over the last 5 years with a weight of 0.5, and AIT 3 (red) responds to the cumulative inflation shortfall over the last 10 years with a weight of 0.5.

In the AIT simulations, we assume that the cumulative inflation gap only looks back to the start of the recession in 2020Q1. We also impose dual liftoff thresholds of 2% inflation and full employment in the AIT simulations, a policy proposed in a recent paper by former top Fed economists David Reifschneider and David Wilcox that is consistent

<sup>1</sup> We thank David Reifschneider and David Wilcox for sharing the materials behind their papers, "Average Inflation Targeting Would Be a Weak Tool for the Fed to Deal with Recession and Chronic Low Inflation," November 2019, and "A Program for Strengthening the Federal Reserve's Ability to Fight the Next Recession," March 2020.

<sup>2</sup> The latest update of FRB/US has inflation returning to target more quickly than usual and somewhat ahead of the unemployment rate reaching its longer-run level. This likely explains why similar Fed staff analyses of AIT in the aftermath of a generic moderate recession, rather than in the current cycle specifically, have generally found that the funds rate would remain at the effective lower bound for even longer than in our results. In addition to the Reifschneider and Wilcox papers cited above, see Jonas Arias, Martin Bodenstein, Hess Chung, Thorsten Drautzburg, and Andrea Ra, "Alternative Strategies: How Do They Work? How Might They Help?" 2020.

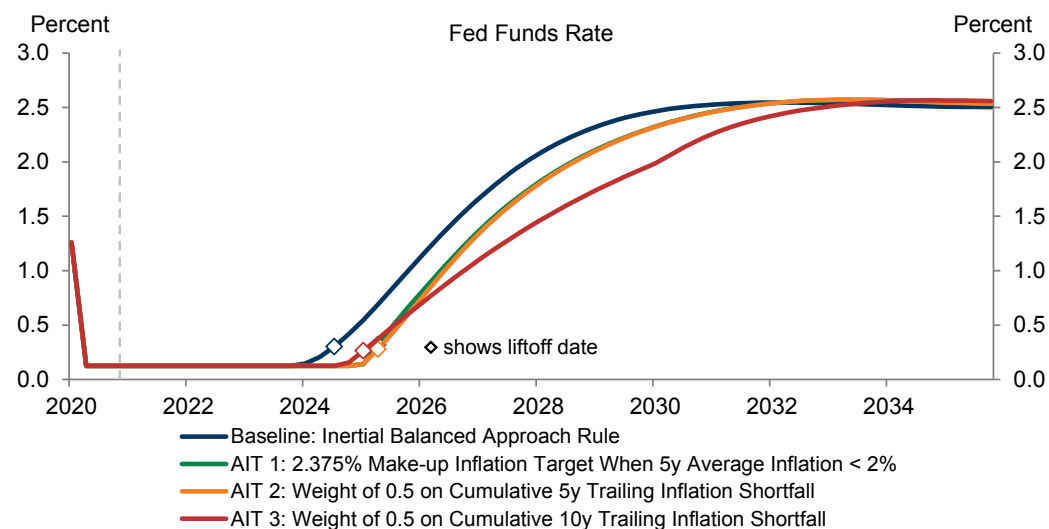
with our forecast for the forward guidance.

Exhibit 3 shows what the AIT rules mean for monetary policy. The AIT rules imply liftoff around early 2025, a few quarters later than the old framework baseline but consistent with our Fed forecast.

AIT 1, the 2.375% make-up target, and AIT 2, which responds to the 5-year gap, are moderately more dovish than the baseline policy in the first few years after liftoff. The two rules produce very similar funds rate paths in this analysis because the FRB/US baseline inflation path reaches 2% fairly quickly, resulting in only a modest 5-year cumulative inflation shortfall after liftoff. If the inflation shortfall were instead larger and more persistent, AIT 2 would call for noticeably more dovish policy than AIT 1.

AIT 3, which responds to the 10-year gap, calls for liftoff one quarter earlier than the other two AIT policies because the expectation of higher future inflation lowers real rates and accelerates the early recovery. But in the years that follow it is more dovish than the other rules because the longer lookback window still includes the inflation dip during the recessionary start of the cycle. This translates to a slower peak pace of tightening of just under 50bp per year, versus 50-75bp in the other three rules.

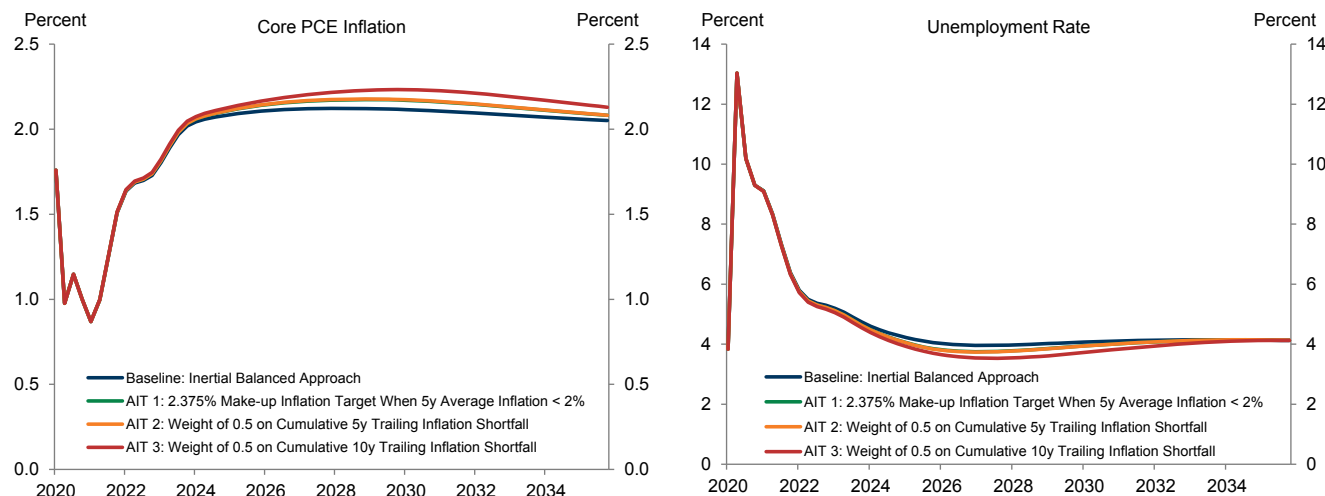
**Exhibit 3: Under the FOMC's Latest Economic Forecasts, AIT Policies Would Imply Liftoff Around Early 2025**



Source: Goldman Sachs Global Investment Research

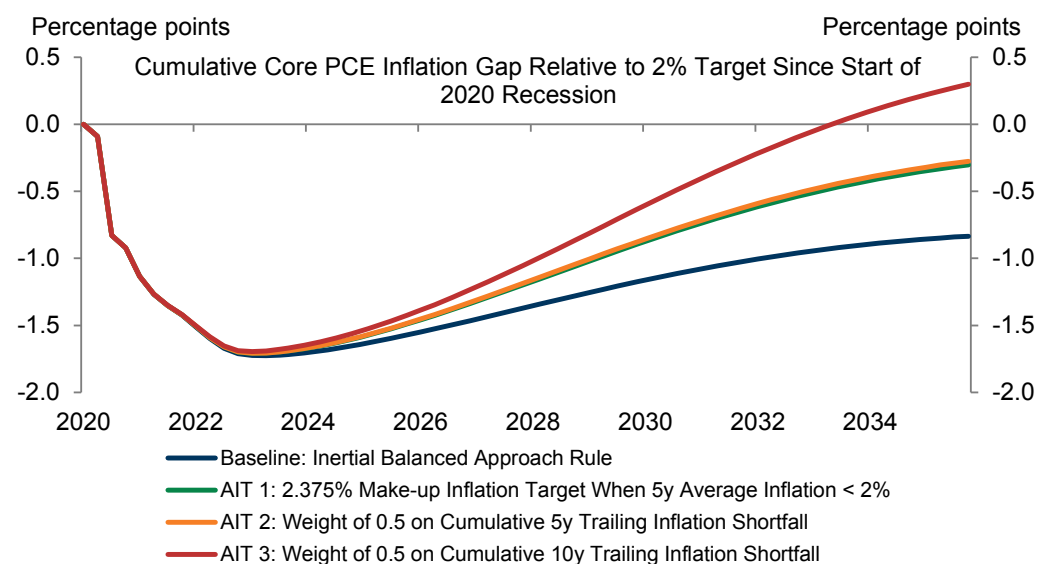
Exhibit 4 shows what the AIT rules mean for the economy. AIT 1 and 2 generate slightly higher inflation and lower unemployment than the old framework baseline, and AIT 3 has somewhat larger effects. We note, however, that realistically-calibrated models like FRB/US imply that the incremental impact of lower-for-longer policies on the economy is fairly small during the initial recession period, a point we and others have made before.<sup>3</sup>

<sup>3</sup> See David Mericle, "A New Challenge to Average Inflation Targeting," US Daily, November 8, 2019, which discusses Reifschneider and Wilcox 2019, and "Fighting the Next Recession," US Economics Analyst, September 29, 2019.

**Exhibit 4: AIT Rules Generate Higher but Still Moderate Inflation and a Modest Labor Market Overshoot**

Source: Goldman Sachs Global Investment Research

Exhibit 5 shows the cumulative inflation gap since the start of the recession in 2020Q1. Only AIT 3, the most aggressive policy with a 10-year lookback window, brings average inflation since the start of the recession back to 2% on a reasonable timeline, and it still takes 12 years. This is in part a reflection of the Phillips curve built into FRB/US, which is fairly flat though not unrealistic.

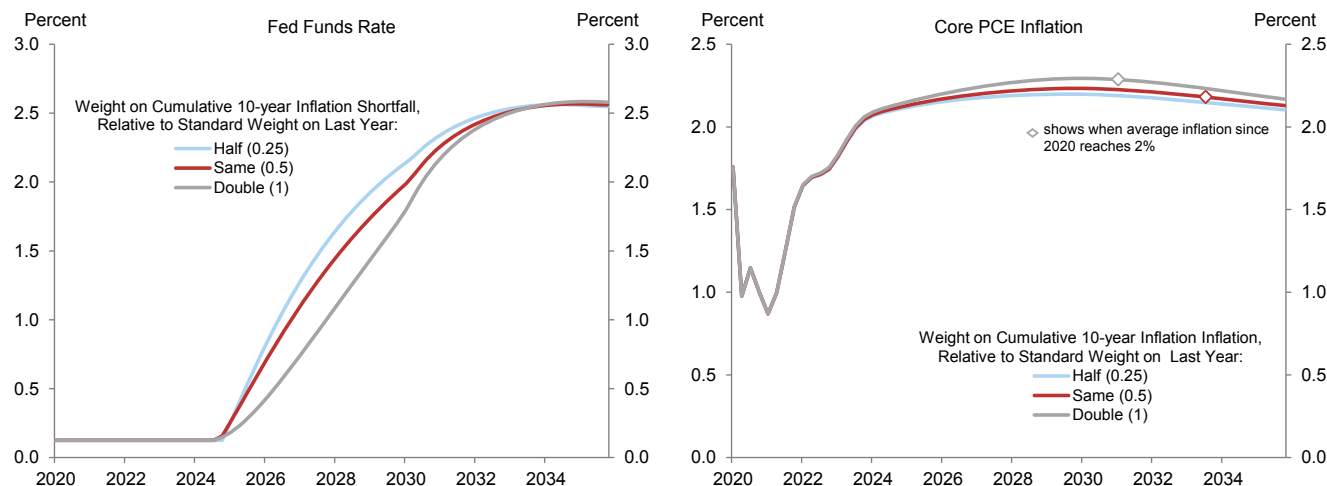
**Exhibit 5: Only the AIT Rule with a 10-Year Lookback Window Closes the Cumulative Inflation Gap on a Reasonable Timeline**

Source: Goldman Sachs Global Investment Research

How could policymakers bring average inflation since the start of the recession back to 2% more quickly? One approach is to simply put more weight on the cumulative inflation gap in the policy rule. Exhibit 6 shows that doubling the weight on the cumulative gap brings average inflation back to 2% somewhat earlier. But it still takes

10 years, and as Reifschneider and Wilcox emphasize, this would imply quite an extreme response to past inflation misses. After all, AIT 3 already puts as much weight on inflation misses a decade ago as standard policy rules put on the inflation miss over the last year.

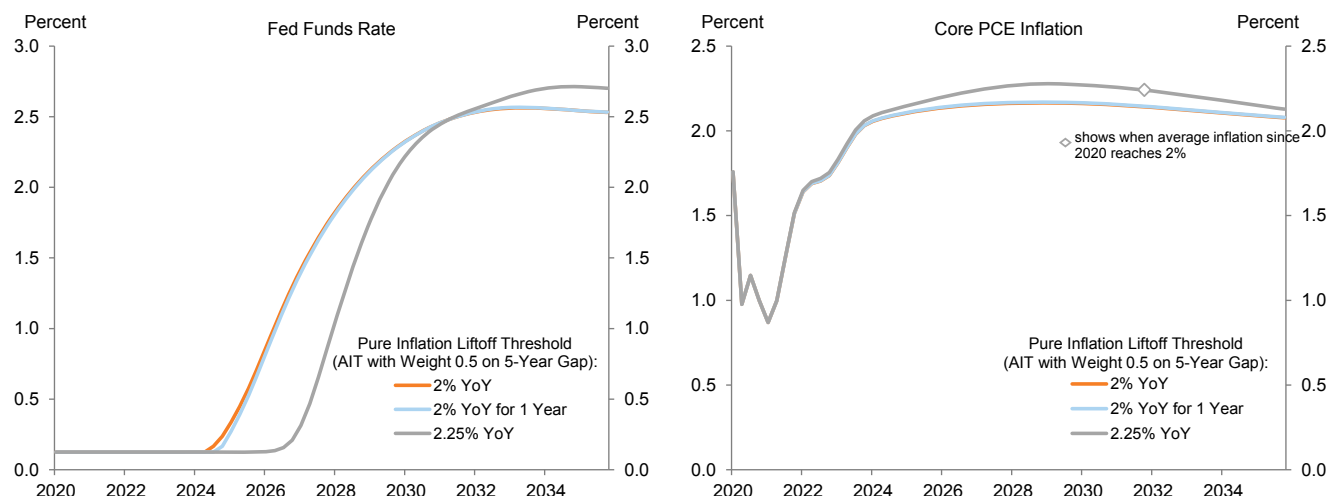
**Exhibit 6: Closing the Cumulative Inflation Gap by 2030 Requires Responding to It Twice as Strongly as Usual**



Source: Goldman Sachs Global Investment Research

Another approach to accelerating the recovery of average inflation is to delay liftoff with a more aggressive inflation threshold. We compare pure inflation thresholds (dropping the unemployment threshold) that require reaching 2% year-on-year, sustaining 2% year-on-year for a full year, or reaching 2.25% year-on-year. We assume that a delayed liftoff policy would be paired with AIT 2's more moderate 5-year lookback window after liftoff. Exhibit 7 shows that switching from a threshold of 2% year-on-year to 2% year-on-year for a full year has a very small impact, partly because the trailing inflation gap still restrains the policy rate at the start and partly because of the smooth inflation dynamics assumed in FRB/US. Using a 2.25% threshold has a larger impact, leading to a later liftoff followed by a faster pace of tightening.



**Exhibit 7: A Pure Inflation Liftoff Threshold of 2.25% Would Generate a Later Liftoff but Faster Tightening**

Source: Goldman Sachs Global Investment Research

We draw three conclusions about the implications of AIT for monetary policy and the economy in the years ahead. First, AIT rules appear roughly consistent with our forecast of liftoff around early 2025. Second, moderate AIT policies generate a moderately lower funds rate path and slightly higher inflation and lower unemployment than the old framework, but return average inflation to 2% very slowly. Third, a quite aggressive AIT policy generates a much lower funds rate path, somewhat larger economic effects, and a return of average inflation to 2% on a lengthy but achievable timeline. These conclusions are sensitive to the baseline trajectory of the economy and other assumptions built into the FRB/US model.

Our analysis also highlights some limitations of the Fed's new strategy. Realistic macroeconomic models like FRB/US generally imply that when the policy rate is at the effective lower bound, lower-for-longer policies like AIT make only a limited incremental contribution to fighting recessions and boosting the economy when it is most depressed. And even in terms of its more limited ambition of stabilizing average inflation, AIT raises some doubts. Under realistic parametrizations, AIT rules would likely require a quite long expansion to return average inflation to 2%, at least if the Phillips curve remains fairly flat.

Policymakers could seek to return average inflation to 2% more quickly by using more aggressive inflation thresholds for liftoff or putting much more weight on inflation misses in the distant past than they usually put even on current inflation. But this might create upside inflation risks that are difficult to capture in our FRB/US-based analysis. We will return to this question of the robustness of more aggressive liftoff thresholds and AIT policies to alternative inflation dynamics in the future.

**David Mericle****Laura Nicolae**

# The US Economic and Financial Outlook

## Forecast Changes

Reflecting strong mid-year consumer momentum and the much-better-than-expected July inventory data, we raised our Q3 GDP tracking estimate by 3.5pp to +30% (qoq ar). We believe some of this upgrade represents a pull-forward of output growth relative to our previous expectations, and we lowered our Q4 and Q1 GDP forecasts by 1.0pp and 1.5pp respectively (to +6.0% and +8.0%).

### THE US ECONOMIC AND FINANCIAL OUTLOOK

(% change on previous period, annualized, except where noted)

	2018	2019	2020 (f)	2021 (f)	2022 (f)	2023 (f)	2020 Q1	2020 Q2	2020 Q3	2020 Q4	2021 Q1	2021 Q2	2021 Q3	2021 Q4
<b>OUTPUT AND SPENDING</b>														
Real GDP	3.0	2.2	-3.8	6.1	3.3	2.2	-5.0	-31.7	30.0	6.0	8.0	7.5	4.0	3.0
Real GDP (annual=Q4/Q4, quarterly=yoy)	2.5	2.3	-2.7	5.6	2.7	2.0	0.3	-9.1	-3.6	-2.7	0.4	12.5	6.4	5.6
Consumer Expenditure	2.7	2.4	-4.6	5.7	3.7	2.3	-6.9	-34.1	35.0	4.0	7.0	8.0	3.6	2.6
Residential Fixed Investment	-0.6	-1.7	2.6	8.8	5.1	2.3	19.0	-37.9	46.6	12.0	8.0	8.0	8.0	5.0
Business Fixed Investment	6.9	2.9	-4.5	7.7	5.2	3.8	-6.7	-26.0	16.2	11.3	11.3	9.4	6.3	5.8
Structures	3.7	-0.6	-6.6	5.8	4.0	2.7	-3.7	-33.4	15.1	7.0	12.0	7.5	5.7	5.3
Equipment	8.0	2.1	-8.5	9.0	4.5	2.7	-15.2	-35.9	30.8	15.0	12.0	10.0	5.0	5.0
Intellectual Property Products	7.8	6.4	1.8	7.5	6.7	5.7	2.4	-7.7	3.0	10.0	10.0	10.0	8.0	7.0
Federal Government	2.8	4.0	4.4	1.3	0.1	0.0	1.5	17.6	-9.0	3.0	3.0	1.0	0.0	0.0
State & Local Government	1.2	1.3	-0.2	1.8	1.6	1.0	1.1	-5.5	0.0	2.0	3.0	3.0	3.0	2.0
Net Exports (\$bn, '09)	-878	-918	-837	-936	-928	-941	-788	-761	-892	-909	-927	-945	-940	-934
Inventory Investment (\$bn, '09)	53	49	-85	119	65	60	-81	-286	-24	50	100	125	125	125
Industrial Production, Mfg.	2.3	-0.2	-8.9	6.6	3.6	1.4	-5.4	-47.0	29.2	13.1	10.2	9.1	5.4	3.9
<b>HOUSING MARKET</b>														
Housing Starts (units, thous)	1,248	1,295	1,277	1,500	1,578	--	1,484	1,064	1,218	1,344	1,477	1,420	1,492	1,610
New Home Sales (units, thous)	614	685	673	770	832	--	701	683	626	683	752	739	763	825
Existing Home Sales (units, thous)	5,334	5,330	4,516	4,358	4,408	--	5,483	4,313	3,952	4,316	4,335	4,354	4,365	4,377
Case-Shiller Home Prices (%yoy)*	4.1	3.2	1.5	2.3	1.9	2.0	4.1	3.4	2.8	1.5	-1.0	0.1	1.2	2.3
<b>INFLATION (% ch, yr/yr)</b>														
Consumer Price Index (CPI)	2.4	1.8	1.3	1.8	1.7	1.8	2.1	0.4	1.3	1.3	1.4	2.7	1.7	1.6
Core CPI	2.1	2.2	1.6	1.6	1.8	1.9	2.2	1.3	1.5	1.3	1.2	2.0	1.5	1.7
Core PCE**	2.0	1.7	1.3	1.5	1.7	1.7	1.8	1.0	1.3	1.3	1.2	1.8	1.5	1.5
<b>LABOR MARKET</b>														
Unemployment Rate (%)^	3.9	3.5	9.0	6.5	5.7	5.2	4.4	11.1	10.1	9.0	8.0	7.2	6.8	6.5
U6 Underemployment Rate (%)^	7.6	6.7	15.0	12.0	10.5	9.7	8.7	18.0	16.3	15.0	14.0	13.1	12.7	12.0
Payrolls (thous, monthly rate)	193	178	-568	550	222	180	-303	-4,424	1,255	1,200	950	685	320	246
<b>GOVERNMENT FINANCE</b>														
Federal Budget (FY, \$bn)	-779	-984	-4,200	-2,700	-1,650	-1,600	--	--	--	--	--	--	--	--
<b>FINANCIAL INDICATORS</b>														
FF Target Range (Bottom-Top, %)^	2.25-2.5	1.5-1.75	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25	0-0.25
10-Year Treasury Note^	2.69	1.92	1.05	1.45	1.65	1.85	0.70	0.66	0.95	1.05	1.15	1.25	1.35	1.45
Euro (€/€)^	1.15	1.12	1.17	1.27	1.28	1.30	1.10	1.12	1.18	1.17	1.19	1.22	1.24	1.27
Yen (¥/¥)^	110	109	106	104	102	101	108	108	106	106	106	105	105	104

\* Weighted average of metro-level HPIs for 381 metro cities where the weights are dollar values of housing stock reported in the American Community Survey.

\*\* PCE = Personal consumption expenditures. ^ Denotes end of period.

Note: Annual, Q4/Q4, and Quarterly YoY GDP growth estimates embed our assumption of an upward revision in Q2 2020 (from -32.9% to -31.6%, qoq ar). Published figures in bold.

Source: Goldman Sachs Global Investment Research.

Source: Goldman Sachs Global Investment Research

## Economic Releases

Date	Time (ET)	Indicator	Estimate		
			GS	Consensus	Last Report
Tue	Sep 01	9:45	Markit US Manufacturing PMI (August final)	n.a.	53.6
		10:00	ISM Manufacturing (August)	55.0	54.5
		10:00	Construction Spending (July)	+0.9%	+1.1%
		17:00	Lightweight Motor Vehicle Sales (August)	+15.0M	+14.5M
Wed	Sep 02	8:15	ADP Employment Change (August)	+1,600k	+950k
		10:00	Factory Orders (July)	+6.1%	+6.0%
		14:00	Federal Reserve Beige Book	n.a.	n.a.
Thu	Sep 03	8:30	Initial Jobless Claims	930k	950k
		8:30	Continuing Claims	n.a.	14,000k
		8:30	Nonfarm Productivity (Q2 final)	+7.4%	+7.4%
		8:30	Unit Labor Costs (Q2 final)	+12.0%	+12.1%
		8:30	Trade Balance (July)	-\$58.0bn	-\$57.0bn
		10:00	ISM Non-Manufacturing (August)	56.5	57.0
Fri	Sep 04	8:30	Nonfarm Payrolls (August)	+1,900k	+1,400k
		8:30	Private Payrolls (August)	+1,650k	+1,275k
		8:30	Unemployment Rate (August)	9.8%	9.8%
		8:30	Average Hourly Earnings (August)	-0.1%	+0.0%
		8:30	Labor Force Participation Rate	n.a.	61.7%

Source: Goldman Sachs Global Investment Research

# Disclosure Appendix

## Reg AC

We, Jan Hatzius, Alec Phillips, David Mericle, Spencer Hill, CFA, Daan Struyven, David Choi, Joseph Briggs, Blake Taylor, Ronnie Walker and Laura Nicolae, hereby certify that all of the views expressed in this report accurately reflect our personal views, which have not been influenced by considerations of the firm's business or client relationships.

Unless otherwise stated, the individuals listed on the cover page of this report are analysts in Goldman Sachs' Global Investment Research division.

## Disclosures

### Regulatory disclosures

#### Disclosures required by United States laws and regulations

See company-specific regulatory disclosures above for any of the following disclosures required as to companies referred to in this report: manager or co-manager in a pending transaction; 1% or other ownership; compensation for certain services; types of client relationships; managed/co-managed public offerings in prior periods; directorships; for equity securities, market making and/or specialist role. Goldman Sachs trades or may trade as a principal in debt securities (or in related derivatives) of issuers discussed in this report.

The following are additional required disclosures: **Ownership and material conflicts of interest:** Goldman Sachs policy prohibits its analysts, professionals reporting to analysts and members of their households from owning securities of any company in the analyst's area of coverage.

**Analyst compensation:** Analysts are paid in part based on the profitability of Goldman Sachs, which includes investment banking revenues. **Analyst as officer or director:** Goldman Sachs policy generally prohibits its analysts, persons reporting to analysts or members of their households from serving as an officer, director or advisor of any company in the analyst's area of coverage. **Non-U.S. Analysts:** Non-U.S. analysts may not be associated persons of Goldman Sachs & Co. LLC and therefore may not be subject to FINRA Rule 2241 or FINRA Rule 2242 restrictions on communications with subject company, public appearances and trading securities held by the analysts.

#### Additional disclosures required under the laws and regulations of jurisdictions other than the United States

The following disclosures are those required by the jurisdiction indicated, except to the extent already made above pursuant to United States laws and regulations. **Australia:** Goldman Sachs Australia Pty Ltd and its affiliates are not authorised deposit-taking institutions (as that term is defined in the Banking Act 1959 (Cth)) in Australia and do not provide banking services, nor carry on a banking business, in Australia. This research, and any access to it, is intended only for "wholesale clients" within the meaning of the Australian Corporations Act, unless otherwise agreed by Goldman Sachs. In producing research reports, members of the Global Investment Research Division of Goldman Sachs Australia may attend site visits and other meetings hosted by the companies and other entities which are the subject of its research reports. In some instances the costs of such site visits or meetings may be met in part or in whole by the issuers concerned if Goldman Sachs Australia considers it is appropriate and reasonable in the specific circumstances relating to the site visit or meeting. To the extent that the contents of this document contains any financial product advice, it is general advice only and has been prepared by Goldman Sachs without taking into account a client's objectives, financial situation or needs. A client should, before acting on any such advice, consider the appropriateness of the advice having regard to the client's own objectives, financial situation and needs. A copy of certain Goldman Sachs Australia and New Zealand disclosure of interests and a copy of Goldman Sachs' Australian Sell-Side Research Independence Policy Statement are available at: <https://www.goldmansachs.com/disclosures/australia-new-zealand/index.html>. **Brazil:** Disclosure information in relation to CVM Instruction 598 is available at <https://www.gs.com/worldwide/brazil/area/gir/index.html>. Where applicable, the Brazil-registered analyst primarily responsible for the content of this research report, as defined in Article 20 of CVM Instruction 598, is the first author named at the beginning of this report, unless indicated otherwise at the end of the text. **Canada:** Goldman Sachs Canada Inc. is an affiliate of The Goldman Sachs Group Inc. and therefore is included in the company specific disclosures relating to Goldman Sachs (as defined above). Goldman Sachs Canada Inc. has approved of, and agreed to take responsibility for, this research report in Canada if and to the extent that Goldman Sachs Canada Inc. disseminates this research report to its clients. **Hong Kong:** Further information on the securities of covered companies referred to in this research may be obtained on request from Goldman Sachs (Asia) L.L.C. **India:** Further information on the subject company or companies referred to in this research may be obtained from Goldman Sachs (India) Securities Private Limited, Research Analyst - SEBI Registration Number INH000001493, 951-A, Rational House, Appasaheb Marathe Marg, Prabhadevi, Mumbai 400 025, India, Corporate Identity Number U74140MH2006FTC160634, Phone +91 22 6616 9000, Fax +91 22 6616 9001. Goldman Sachs may beneficially own 1% or more of the securities (as such term is defined in clause 2 (h) the Indian Securities Contracts (Regulation) Act, 1956) of the subject company or companies referred to in this research report. **Japan:** See below. **Korea:** This research, and any access to it, is intended only for "professional investors" within the meaning of the Financial Services and Capital Markets Act, unless otherwise agreed by Goldman Sachs. Further information on the subject company or companies referred to in this research may be obtained from Goldman Sachs (Asia) L.L.C., Seoul Branch. **New Zealand:** Goldman Sachs New Zealand Limited and its affiliates are neither "registered banks" nor "deposit takers" (as defined in the Reserve Bank of New Zealand Act 1989) in New Zealand. This research, and any access to it, is intended for "wholesale clients" (as defined in the Financial Advisers Act 2008) unless otherwise agreed by Goldman Sachs. A copy of certain Goldman Sachs Australia and New Zealand disclosure of interests is available at: <https://www.goldmansachs.com/disclosures/australia-new-zealand/index.html>. **Russia:** Research reports distributed in the Russian Federation are not advertising as defined in the Russian legislation, but are information and analysis not having product promotion as their main purpose and do not provide appraisal within the meaning of the Russian legislation on appraisal activity. Research reports do not constitute a personalized investment recommendation as defined in Russian laws and regulations, are not addressed to a specific client, and are prepared without analyzing the financial circumstances, investment profiles or risk profiles of clients. Goldman Sachs assumes no responsibility for any investment decisions that may be taken by a client or any other person based on this research report. **Singapore:** Further information on the covered companies referred to in this research may be obtained from Goldman Sachs (Singapore) Pte. (Company Number: 198602165V). **Taiwan:** This material is for reference only and must not be reprinted without permission. Investors should carefully consider their own investment risk. Investment results are the responsibility of the individual investor. **United Kingdom:** Persons who would be categorized as retail clients in the United Kingdom, as such term is defined in the rules of the Financial Conduct Authority, should read this research in conjunction with prior Goldman Sachs research on the covered companies referred to herein and should refer to the risk warnings that have been sent to them by Goldman Sachs International. A copy of these risks warnings, and a glossary of certain financial terms used in this report, are available from Goldman Sachs International on request.

**European Union:** Disclosure information in relation to Article 6 (2) of the European Commission Delegated Regulation (EU) (2016/958) supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the technical arrangements for objective presentation of investment recommendations or other information recommending or suggesting an investment strategy and for disclosure of particular interests or indications of conflicts of interest is available at <https://www.gs.com/disclosures/europeanpolicy.html> which states the European Policy for Managing Conflicts of Interest in Connection with Investment Research.

**Japan:** Goldman Sachs Japan Co., Ltd. is a Financial Instrument Dealer registered with the Kanto Financial Bureau under registration number Kinsho 69, and a member of Japan Securities Dealers Association, Financial Futures Association of Japan and Type II Financial Instruments Firms Association.

Sales and purchase of equities are subject to commission pre-determined with clients plus consumption tax. See company-specific disclosures as to any applicable disclosures required by Japanese stock exchanges, the Japanese Securities Dealers Association or the Japanese Securities Finance Company.

## Global product; distributing entities

The Global Investment Research Division of Goldman Sachs produces and distributes research products for clients of Goldman Sachs on a global basis. Analysts based in Goldman Sachs offices around the world produce research on industries and companies, and research on macroeconomics, currencies, commodities and portfolio strategy. This research is disseminated in Australia by Goldman Sachs Australia Pty Ltd (ABN 21 006 797 897); in Brazil by Goldman Sachs do Brasil Corretora de Títulos e Valores Mobiliários S.A.; Ombudsman Goldman Sachs Brasil: 0800 727 5764 and / or [ouvidoriagoldmansachs@gs.com](mailto:ouvidoriagoldmansachs@gs.com). Available Weekdays (except holidays), from 9am to 6pm. Ouvidoria Goldman Sachs Brasil: 0800 727 5764 e/ou [ouvidoriagoldmansachs@gs.com](mailto:ouvidoriagoldmansachs@gs.com). Horário de funcionamento: segunda-feira à sexta-feira (exceto feriados), das 9h às 18h; in Canada by either Goldman Sachs Canada Inc. or Goldman Sachs & Co. LLC; in Hong Kong by Goldman Sachs (Asia) L.L.C.; in India by Goldman Sachs (India) Securities Private Ltd.; in Japan by Goldman Sachs Japan Co., Ltd.; in the Republic of Korea by Goldman Sachs (Asia) L.L.C., Seoul Branch; in New Zealand by Goldman Sachs New Zealand Limited; in Russia by OOO Goldman Sachs; in Singapore by Goldman Sachs (Singapore) Pte. (Company Number: 198602165W); and in the United States of America by Goldman Sachs & Co. LLC. Goldman Sachs International has approved this research in connection with its distribution in the United Kingdom and European Union.

**European Union:** Goldman Sachs International authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, has approved this research in connection with its distribution in the European Union and United Kingdom.

## General disclosures

This research is for our clients only. Other than disclosures relating to Goldman Sachs, this research is based on current public information that we consider reliable, but we do not represent it is accurate or complete, and it should not be relied on as such. The information, opinions, estimates and forecasts contained herein are as of the date hereof and are subject to change without prior notification. We seek to update our research as appropriate, but various regulations may prevent us from doing so. Other than certain industry reports published on a periodic basis, the large majority of reports are published at irregular intervals as appropriate in the analyst's judgment.

Goldman Sachs conducts a global full-service, integrated investment banking, investment management, and brokerage business. We have investment banking and other business relationships with a substantial percentage of the companies covered by our Global Investment Research Division. Goldman Sachs & Co. LLC, the United States broker dealer, is a member of SIPC (<https://www.sipc.org>).

Our salespeople, traders, and other professionals may provide oral or written market commentary or trading strategies to our clients and principal trading desks that reflect opinions that are contrary to the opinions expressed in this research. Our asset management area, principal trading desks and investing businesses may make investment decisions that are inconsistent with the recommendations or views expressed in this research.

We and our affiliates, officers, directors, and employees, will from time to time have long or short positions in, act as principal in, and buy or sell, the securities or derivatives, if any, referred to in this research, unless otherwise prohibited by regulation or Goldman Sachs policy.

The views attributed to third party presenters at Goldman Sachs arranged conferences, including individuals from other parts of Goldman Sachs, do not necessarily reflect those of Global Investment Research and are not an official view of Goldman Sachs.

Any third party referenced herein, including any salespeople, traders and other professionals or members of their household, may have positions in the products mentioned that are inconsistent with the views expressed by analysts named in this report.

This research is focused on investment themes across markets, industries and sectors. It does not attempt to distinguish between the prospects or performance of, or provide analysis of, individual companies within any industry or sector we describe.

Any trading recommendation in this research relating to an equity or credit security or securities within an industry or sector is reflective of the investment theme being discussed and is not a recommendation of any such security in isolation.

This research is not an offer to sell or the solicitation of an offer to buy any security in any jurisdiction where such an offer or solicitation would be illegal. It does not constitute a personal recommendation or take into account the particular investment objectives, financial situations, or needs of individual clients. Clients should consider whether any advice or recommendation in this research is suitable for their particular circumstances and, if appropriate, seek professional advice, including tax advice. The price and value of investments referred to in this research and the income from them may fluctuate. Past performance is not a guide to future performance, future returns are not guaranteed, and a loss of original capital may occur. Fluctuations in exchange rates could have adverse effects on the value or price of, or income derived from, certain investments.

Certain transactions, including those involving futures, options, and other derivatives, give rise to substantial risk and are not suitable for all investors. Investors should review current options and futures disclosure documents which are available from Goldman Sachs sales representatives or at <https://www.theocc.com/about/publications/character-risks.jsp> and [https://www.fiadocumentation.org/fia/regulatory-disclosures\\_1/fia-uniform-futures-and-options-on-futures-risk-disclosures-booklet-pdf-version-2018](https://www.fiadocumentation.org/fia/regulatory-disclosures_1/fia-uniform-futures-and-options-on-futures-risk-disclosures-booklet-pdf-version-2018). Transaction costs may be significant in option strategies calling for multiple purchase and sales of options such as spreads. Supporting documentation will be supplied upon request.

**Differing Levels of Service provided by Global Investment Research:** The level and types of services provided to you by the Global Investment Research division of GS may vary as compared to that provided to internal and other external clients of GS, depending on various factors including your individual preferences as to the frequency and manner of receiving communication, your risk profile and investment focus and perspective (e.g., marketwide, sector specific, long term, short term), the size and scope of your overall client relationship with GS, and legal and regulatory constraints. As an example, certain clients may request to receive notifications when research on specific securities is published, and certain clients may request that specific data underlying analysts' fundamental analysis available on our internal client websites be delivered to them electronically through data feeds or otherwise. No change to an analyst's fundamental research views (e.g., ratings, price targets, or material changes to earnings estimates for equity securities), will be communicated to any client prior to inclusion of such information in a research report broadly disseminated through electronic publication to our internal client websites or through other means, as necessary, to all clients who are entitled to receive such reports.

All research reports are disseminated and available to all clients simultaneously through electronic publication to our internal client websites. Not all research content is redistributed to our clients or available to third-party aggregators, nor is Goldman Sachs responsible for the redistribution of our research by third party aggregators. For research, models or other data related to one or more securities, markets or asset classes (including related services) that may be available to you, please contact your GS representative or go to <https://research.gs.com>.

Disclosure information is also available at <https://www.gs.com/research/hedge.html> or from Research Compliance, 200 West Street, New York, NY 10282.

© 2020 Goldman Sachs.

No part of this material may be (i) copied, photocopied or duplicated in any form by any means or (ii) redistributed without the prior written consent of The Goldman Sachs Group, Inc.