

STATEMENT REGARDING THE IOSCO PRINCIPLES FOR FINANCIAL BENCHMARKS

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GENERAL

ICAP Information Services Limited trading as Parameta Solutions ("Parameta Solutions") is a benchmark administrator as defined within the International Organisation of Securities Commissions (IOSCO) "Principles for Financial Benchmarks" ("the IOSCO Principles").

Parameta Solutions is aware of the risks posed by inadequate governance, conflicts of interest and a lack of transparency in the management of indices and has built controls processes for the indices it manages with these in mind.

Parameta Solutions fully supports the objectives of the IOSCO Principles.

PROPORTIONALITY AND EXTENT OF COMPLIANCE WITH THE IOSCO PRINCIPLES

Parameta Solutions administers and calculates indices. Various indices provided by the Parameta Solutions are used as the indices underlying financial instruments and/or financial contracts, which are described within the IOSCO Principles as benchmarks ("Benchmarks").

The Benchmarks, are managed by its Index Governance Forum, comprised of Parameta Solutions staff, and overseen by the Parameta Solutions Oversight Committee.

Parameta Solutions is compliant with the IOSCO Principles for Financial Benchmarks, with respect to the use of its Benchmarks. This document details its compliance.

PARAMETA SOLUTIONS' POLICIES AND PROCEDURES

Parameta Solutions' policies and procedures comply with IOSCO's recommended practices regarding the establishment, operation and oversight of the Benchmarks.

Parameta Solutions has in place a control and oversight framework which is designed to promote the quality and integrity of the determination process for the Benchmarks. The standards that have been set by Parameta Solutions are designed to ensure that:

- Potential conflicts of interests which arise out of the Benchmarks are appropriately identified and addressed.
- Each Benchmark will adequately reflect the interest for which it has been established.
- There are procedures designed to mitigate the market impact of methodology changes or cessations of any Benchmark.

IOSCO PRINCIPLES REGARDING GOVERNANCE

PRINCIPLE 1 - OVERALL RESPONSIBILITY OF THE ADMINISTRATOR

Parameta Solutions recognises it holds the ultimate responsibility for its Benchmarks. Parameta Solutions' Index Governance Forum has responsibility for making decisions regarding the Benchmark calculation methodologies, modifications to the existing methodologies as well as general guidelines for the maintenance of any Benchmarks.

As administrator of the Benchmarks, Parameta Solutions recognises its responsibility for the benchmark development, calculation, publication, maintenance and licensing.

Oversight of the administration of the benchmarks will be carried out by the Parameta Solutions Oversight Committee. The Committee's Terms of Reference is available on its website.

PRINCIPLE 2 - OVERSIGHT OF THIRD PARTIES

Parameta Solutions has outsourced the index calculation to TP ICAP Markets Limited or TP ICAP (Europe) SA. Appropriate written agreements have been established which defines the

relationship, roles and responsibilities between the parties. Parameta Solutions undertakes detailed monitoring of the performance of these services.

PRINCIPLE 3 - CONFLICTS OF INTEREST FOR ADMINISTRATORS

POLICIES

Parameta Solutions has put in place a number of policies and procedures that address how current and potential conflicts of interest are or will be identified, recorded, managed, mitigated, prevented and disclosed.

Parameta Solutions is segregated from those parts of TP ICAP business who may use or may have an interest in the benchmark rate.

The Conflicts of Interest Policy and the Conflicts of Interest Policy further detail controls.

PRINCIPLE 4 - CONTROL FRAMEWORK FOR ADMINISTRATORS

Parameta Solutions' control framework for the administration of the Benchmarks was developed to meet the requirements of the IOSCO Principles while promoting the highest ethical business standards within Parameta Solutions.

- It seeks to ensure that staff are competent, appropriately trained and supervised, that conflicts of interest are managed, and that systems and procedures ensure compliance at both an individual and company level.
- It details the bodies responsible for the management, quality and integrity of the indices and for the management of operational risk (including conflicts of interest).
- It incorporates an effective whistleblowing mechanism that allows both early internal reporting of possible, known or intended misconduct, and for external whistleblowing if necessary.

All directors and employees are responsible for reading, understanding and complying with all procedures applicable to them. The TP ICAP Code of Conduct makes clear the serious consequences of failing to do so.

In addition, Parameta Solutions maintains plans for controlling and managing operational, business continuity, disaster recovery and other risks.

The Benchmarks are not based on submissions.

PRINCIPLE 5 - INTERNAL OVERSIGHT

The ultimate responsibility lies with the directors of ICAP Information Services Limited with the day-to-day management undertaken by the relevant employees involved in the provision of a benchmark.

The governance framework is available on the Parameta Solutions' website which highlights the different forums available that are responsible for the day-to-day provision of the Benchmarks. Each forum's terms of reference set out all relevant aspects of its capacity and procedures have been documented and will be made available to relevant regulatory authorities on request and the main features of these procedures will be made available on request to stakeholders.

Oversight is provided by the Parameta Solutions' Oversight Committee, whose members are independent of the day-to-day management of the Benchmarks and may not be voting members of the Index Governance Forum, Product Initiation Forum and/or Product Acceptance Forum.

The Oversight Committee responsibilities as detailed in its terms of reference include:

- The definition and methodologies of the Benchmarks.
- Supporting and advising the Index Governance Forum as required in carrying out its

supervisory and decision-making functions in order to maintain a proper governance over the administration of the Benchmarks.

- Reviewing the benchmark's definition and methodology at least annually.
- Overseeing any changes to the benchmark methodology, and where it deems appropriate, requesting Parameta Solutions consults on such changes.
- Overseeing Parameta Solutions' control framework and the management and operation of the indices.
- Reviewing and approving procedures for cessation of any benchmark, including any consultation about a cessation.
- Assessing any internal and external audits or reviews and monitoring the implementation of identified remedial actions.

IOSCO PRINCIPLES REGARDING THE QUALITY OF THE BENCHMARKS

PRINCIPLE 6 - BENCHMARK DESIGN

Parameta Solutions ensures that the Benchmarks are designed to ensure an accurate and reliable representation of the relevant economic interest and ensure that Benchmark components are sufficiently liquid to provide transparent, accurate pricing.

Key points regarding Benchmark designs:

- Parameta Solutions methodologies are continually developed to reflect best practice. They are reviewed by the Index Governance Forum on an annual basis, or more often as circumstances require.
- Various constituent weighting methodologies may be used to provide Benchmarks fit for the purpose to which they will be used. However, Parameta Solutions always looks to ensure its Benchmarks provide an accurate and reliable representation of the relevant interest.

Parameta Solutions Benchmark methodologies are public documents available on its website.

PRINCIPLE 7 - DATA SUFFICIENCY

The Benchmark methodologies describe how data is used in the Benchmark calculation.

Parameta Solutions develops Benchmarks based on regulated data, reported bid/offer "mid prices" and/or expressions of interest, such prices would in general be considered appropriate for Benchmark use and would meet the requirements of this Principle. Parameta Solutions' Index Governance Forum nonetheless is responsible for monitoring the adequacy of prices formed in all markets, including less liquid markets, and for considering suitable measures to mitigate any potential issues, where appropriate.

PRINCIPLE 8 - HIERARCHY OF DATA INPUTS

Parameta Solutions has established and will make available clear guidelines on the hierarchy of data inputs and the exercise of expert judgement used in the determination of the Benchmarks.

The Benchmarks are not based on submissions.

PRINCIPLE 9 - TRANSPARENCY OF BENCHMARK DETERMINATIONS

The Benchmarks have published methodologies and are derived from appropriate pricing data; accordingly, the Benchmarks meet the requirements of Principle 9.

PRINCIPLE 10 – PERIODIC REVIEW

Parameta Solutions periodically reviews the Benchmarks and determines whether each Benchmark continues to provide a calculation of the underlying interest. The Index Governance Forum and the Oversight Committee review each Benchmark methodology at least annually.

If the Index Governance Forum or Index Oversight Committee determines that a particular Benchmark may require modification or termination, it will consult with stakeholders as per the processes detailed within its Cessation and Transition Policy and, if a decision is taken to modify or terminate a Benchmark, it will notify stakeholders accordingly, and in the case of a modification, maintain a record of the changes within the Benchmark methodology.

IOSCO PRINCIPLES REGARDING QUALITY OF METHODOLOGIES

PRINCIPLE 11 – CONTENT OF THE METHODOLOGY

Parameta Solutions Benchmark methodologies are created and developed by experts in benchmark design and (where appropriate) by consultation with stakeholders. The Benchmark methodologies are the written rules and procedures on how the benchmarks is created and determined.

The Benchmark methodologies are reviewed by the Index Governance Forum on an annual basis, or as required, to be accurate representations of the underlying economic interest.

Parameta Solutions fully documents and publishes a methodology covering each of its Benchmarks. These documents are available on the Parameta Solutions website. They are intended to contain all the necessary information for stakeholders to understand the methodology and objectives of the Benchmarks, in order to assess the suitability of any Benchmark for their purposes.

PRINCIPLES 12 AND 13 – CHANGES TO THE METHODOLOGY AND POSSIBLE CESSATION OF BENCHMARKS

Parameta Solutions has established procedures to be followed with respect to amendments to methodologies, detailed in the Parameta Solutions Cessation and Transition Policy. The Policy defines the process to be followed when either a material changes or cessation is considered.

- All material amendments require consultation with stakeholders, and the approval of the Parameta Solutions Index Governance Forum before implementation.
- Wherever possible, advance notice of changes will be provided.
- Following market consultations, a summary of comments and Parameta Solutions' response to each will be provided.

Parameta Solutions has determined that it is not appropriate to set out criteria to guide the selection of alternative Benchmarks or to identify alternative Benchmarks. However, if a Benchmark is discontinued, Parameta Solutions will consult with its licensees and stakeholders in order to attempt to ensure a smooth transition.

PRINCIPLE 14 – SUBMITTER CODE OF CONDUCT

Parameta Solutions' Benchmarks are not based on submissions, and therefore Principle 14 does not apply.

PRINCIPLE 15 – INTERNAL CONTROLS OVER DATA COLLECTION

Parameta Solutions uses regulated and unregulated data.

If Parameta Solutions creates Benchmarks for which non-regulated pricing data is required, suitable monitoring procedures will be put into place to ensure the reliability of that input data.

IOSCO PRINCIPLES ON ACCOUNTABILITY

PRINCIPLE 16 – COMPLAINTS PROCEDURES

Parameta Solutions has established and published a Complaints Policy that can be obtained from Parameta Solutions' website. The Policy sets out:

- What constitutes a complaint.
- How a complaint can be made.
- How it will be investigated.
- What actions may follow its investigation.
- How a complainant can request that the results of the investigation are reviewed, if considered unsatisfactory.

Any changes to a methodology that are considered as a result of a complaint will be subject to the engagement processes and approvals processes detailed as per Principles 12 and 13.

PRINCIPLE 17 – AUDITS

Parameta Solutions will arrange a yearly assessment of its compliance with the IOSCO Principles.

PRINCIPLE 18 – AUDIT TRAIL

Parameta Solutions retains a record of input data, supporting documentation, benchmark review and benchmark calculation decisions made.

Benchmark reviews are reviewed by the Index Governance Forum and the Oversight Committee.

Parameta Solutions retains a record of all decisions taken by the Index Governance Forum and the Oversight Committee, including any exercise of expert judgement or deviations from the published methodology. Changes to methodologies will be recorded within the methodology documents.

Parameta Solutions' records are retained for a period of five years.

PRINCIPLE 19 – COOPERATION WITH REGULATORY AUTHORITIES

Where required by applicable laws and regulations, Parameta Solutions shall make available all information or documentation readily available to regulatory authorities.

FURTHER INFORMATION

For further information please email: benchmarkqueries@parametasolutions.com

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