

Statement of Adherence to the IOSCO Principles for Financial Benchmarks

As of March 31, 2024

Introduction to Indices Administered by AIE

Akros Index Engineering Inc (“AIE” or the “Administrator”) is a U.S. subsidiary of Akros Technologies Inc (“AT”) and is the Benchmark Administrator for the following indices that are collectively referred to as the “Akros Indices”:

- KEDI Global AI Cloud Index
- KEDI Global AI Semiconductor Index
- KEDI Global Generative AI Index
- KEDI Global Longevity Bio Index
- KEDI Gold Covered Call Premium Index
- KEDI Tesla Income Premium Covered Call Index
- KEDI US AI Software Index
- KEDI US AI Tech Top 10 Index
- KEDI US AI Tech Top 10 Weekly Premium Index
- KEDI US Global Obesity Care Industry Index
- KEDI UST 20Y Covered Call Index
- KEDI UST 30 Weekly Covered Call Index
- Akros Australia Cash Cow 30 Index
- Akros Australia Enhanced All Cap 25 Index
- Akros Australia Enhanced Small Cap 25 Index
- Akros Australia Gold Covered Call Index
- Akros Australia FANG+ Covered Call Index
- Akros Japan High Consecutive Dividend 15 Index

Morningstar Indexes is the outsourced Calculation Agent of the benchmark appointed by the Administrator.

More information on the above index categories, which this report will refer to as index families, can be seen at: <https://index.engineering/>. Index Rules and Methodologies are available on the same website.

Background to the IOSCO Principles for Financial Benchmarks

In July 2013, the Board of the International Organization of Securities Commissions (“IOSCO”) issued the Principles of Financial Benchmarks with the aim of promoting the reliability of Benchmark determinations and addressing Benchmark governance, quality, and accountability.

IOSCO issued Principles with the recommendation that they guide all financial Benchmark Administrators. The IOSCO Principles state that the application should be proportional to the size and risks posed by the relevant Benchmark and/or Benchmark Administrator and the Benchmark-setting process.

We have established control processes in relation to governance, quality and accountability activities over the indices administered by AIE which are described in more detail in the table below. Terms used but not defined in this document have the meaning given to them in the IOSCO Principles for Financial Benchmarks.

For Further Information

AIE's contact details for the Akros Indices are:

- By email to: akros@index.engineering

Further details about AIE and the Akros Indices can be found on the AIE website.

Management's Statement of Adherence

April 11, 2024

Akros Index Engineering Inc ("AIE", or the "Company") has implemented control measures for the benchmarks it manages, as listed in the "Introduction to Indices administered by AIE" and specifically in the "AIE's Relevant Control Measures" section of the accompanying "Principles and Statements" (the "Controls"). These Controls aim to provide reasonable assurance that the governance, quality, and accountability objectives included in the International Organization of Securities Commissions (IOSCO) Principles for Financial Benchmarks, dated July 2013 (the "IOSCO Principles") were achieved. The effectiveness of the Controls is assessed based on the criteria specified in the "Principles and Statements" (the "Criteria").

We are responsible for designing, implementing, operating, and monitoring effective Controls. We are also responsible for identifying the risk that would threaten the achievement of the objectives of the IOSCO Principles. The Controls were designed in a manner that is specified in the IOSCO Principles, which should be proportional to the size and risks posed by each benchmark and/or administrator and the benchmark-setting process.

We have assessed whether the Controls were designed, implemented, operated and monitored effectively as of March 31, 2024 to adhere to the IOSCO Principles based on the Criteria.

Based on that assessment, we assert that the Controls were designed, implemented, operated, and monitored effectively, in all material respects, as described for the period as of March 31, 2024 to adhere to the IOSCO Principles for benchmarks administered by the Company.

Signature

Jin Chung

Chief Executive Officer

For and on behalf of Akros Index Engineering Inc

Principles and Statements

IOSCO Principle	AIE's Relevant Control Measures
<p>1. Overall Responsibility of the Administrator</p> <p>The Administrator should retain primary responsibility for all aspects of the Benchmark determination process. For example, this includes:</p>	<p>AIE is the Administrator for the Akros Indices with primary responsibility for all aspects of the Benchmark determination process.</p>
<p>a) Development: The definition of the Benchmark and Benchmark Methodology;</p>	<p>AIE's Board of Directors (the "Board of Directors") has approved every methodology of the Akros Indices. Details of the methodologies are available on the AIE website.</p>
<p>b) Determination and Dissemination: Accurate and timely compilation and publication and distribution of the Benchmark;</p>	<p>The methodology documents describe the duties of AIE in determining the Akros Indices. These indices are calculated on every business day and are made available via Morningstar Indexes.</p>
<p>c) Operation: Ensuring appropriate transparency over significant decisions affecting the compilation of the Benchmark and any related determination process, including contingency measures in the event of absence of or insufficient inputs, market stress or disruption, failure of critical infrastructure, or other relevant factors; and</p>	<p>Significant decisions affecting the compilation of the Benchmark and any related determination process are shared with the public. These include:</p> <ul style="list-style-type: none"> ▪ Changes to index compositions following periodic reviews, as outlined in the methodology documents; ▪ Planned approaches to upcoming complex corporate events, as detailed in the <i>Akros Index Engineering Corporate Actions and Events Guide</i>; and ▪ Contingency measures in the event of absence of or insufficient inputs, market stress or disruption as described in the <i>Akros Index Engineering Policy of Tradability</i>.
<p>d) Governance: Establishing credible and transparent governance, oversight and accountability procedures for the Benchmark determination process, including an identifiable oversight function accountable for the development, issuance and operation of the Benchmark.</p>	<p>AIE has nominated an independent Compliance Officer to review the benchmark's definition and to provide challenges on all aspects of the benchmark determination process</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>2. Oversight of Third Parties</p> <p>Where activities relating to the Benchmark determination process are undertaken by third parties – for example collection of inputs, publication or where a third party acts as Calculation Agent – the Administrator should maintain appropriate oversight of such third parties. The Administrator (and its oversight function) should consider adopting policies and procedures that:</p>	<p>AIE follows the <i>Akros Group Outsourcing Policy</i> when entering into arrangements with third party suppliers. This policy includes the following procedures:</p>
<p>a) Clearly define and substantiate through appropriate written arrangements the roles and obligations of third parties who participate in the Benchmark determination process, as well as the standards the Administrator expects these third parties to comply with;</p>	<p>The Compliance Officer oversees and reviews written arrangements with third parties involved in the Benchmark determination process to ensure the roles and obligations of such parties are clearly defined.</p>
<p>b) Monitor third parties' compliance with the standards set out by the Administrator;</p>	<p>AIE employs automated quality assurance procedures designed to monitor third party calculators including routinely checking calculated values to mitigate the risks associated with any errors in the sourced data.</p>
<p>c) Make Available to Stakeholders and any relevant Regulatory Authority the identity and roles of third parties who participate in the Benchmark determination process; and</p>	<p>AIE keeps a record of all third parties involved in the Benchmark determination process, along with their roles. AIE discloses the involvement of any such third party to stakeholders as necessary.</p>
<p>d) Take reasonable steps, including contingency plans, to avoid undue operational risk related to the participation of third parties in the Benchmark determination process.</p> <p>This Principle does not apply in relation to a third party from whom an Administrator sources data if that third party is a Regulated Market or Exchange.</p>	<p>AIE takes reasonable steps to avoid undue operational risks, including the maintenance of a Business Continuity program that is reviewed and tested by the Compliance Officer on an annual basis.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>3. Conflicts of Interest for Administrators</p> <p>To protect the integrity and independence of Benchmark determinations, Administrators should document, implement and enforce policies and procedures for the identification, disclosure, management, mitigation or avoidance of conflicts of interest. Administrators should review and update their policies and procedures as appropriate.</p> <p>Administrators should disclose any material conflicts of interest to their users and any relevant Regulatory Authority, if any.</p> <p>The framework should be appropriately tailored to the level of existing or potential conflicts of interest identified and the risks that the Benchmark poses and should seek to ensure:</p>	<p>AIE has established the <i>Akros Index Engineering Conflicts of Interest Policy</i> which identify, disclose, mitigate, avoid, and manage potential and actual conflicts of interest in general. This policy is reviewed and approved annually. AIE's staff certify compliance with this policy upon joining and once per calendar year thereafter.</p>
<p>a) Existing or potential conflicts of interest do not inappropriately influence Benchmark determinations;</p>	<p>All employees are required to disclose existing or potential conflicts of interest upon hire as well as on a semi-annual basis. Before trading certain securities, all AIE employees are required to obtain first approval from management and the Compliance Officer.</p>
<p>b) Personal interests and connections or business connections do not compromise the Administrator's performance of its functions;</p>	<p>All AIE employees are prohibited from participating in external business ventures or professional relationships that might conflict with their responsibilities at AIE. They must report and gain consent from management and the Compliance Officer before engaging in such activities or relationships that could appear conflicting. Furthermore, there are specific limitations for AIE staff on accepting and offering gifts and entertainment, and they must adhere to relevant anti-bribery and corruption regulations.</p>

IOSCO Principle	AIE's Relevant Control Measures
c) Segregation of reporting lines within the Administrator, where appropriate, to clearly define responsibilities and prevent unnecessary or undisclosed conflicts of interest or the perception of such conflicts;	To avoid undisclosed conflicts of interest or the perception of conflicts of interests with other Akros entities, the roles and responsibilities of AIE employees are precisely outlined. The Compliance Officer will conduct an annual evaluation of AIE's roles, responsibilities, and reporting structures.
d) Adequate supervision and sign-off by authorized or qualified employees prior to releasing Benchmark determinations;	While index calculations are mostly automated, validation procedures are in place to ensure the accuracy and integrity of the indices that are published. Each Benchmark is signed off by a designated delegate.
e) The confidentiality of data, information and other inputs submitted to, received by or produced by the Administrator, subject to the disclosure obligations of the Administrator;	AIE is subject to the <i>Akros Confidentiality Policy</i> which covers the confidentiality of data and information. Additionally, training on confidentiality obligations is a required part of the training program for all AIE employees to ensure they are fully informed about these requirements.
f) Effective procedures to control the exchange of information between staff engaged in activities involving a risk of conflicts of interest or between staff and third parties, where that information may reasonably affect any Benchmark determinations; and	All AIE individuals are subject to the <i>Akros Confidentiality Policy</i> and <i>Akros Index Engineering Conflicts of Interest Policy</i> to control the exchange of information between staff and third parties.
g) Adequate remuneration policies that ensure all staff who participate in the Benchmark determination are not directly or indirectly rewarded or incentivized by the levels of the Benchmark.	AIE staff are not rewarded or compensated based upon the level of any Benchmarks.

IOSCO Principle	AIE's Relevant Control Measures
<p>An Administrator's conflict of interest framework should seek to mitigate existing or potential conflicts created by its ownership structure or control, or due to other interests the Administrator's staff or wider group may have in relation to Benchmark determinations. To this end, the framework should:</p> <ul style="list-style-type: none"> a) Include measures to avoid, mitigate or disclose conflicts of interest that may exist between its Benchmark determination business (including all staff who perform or otherwise participate in Benchmark production responsibilities), and any other business of the Administrator or any of its affiliates; and b) Provide that an Administrator discloses conflicts of interest arising from the ownership structure or the control of the Administrator to its Stakeholders and any relevant Regulatory Authority in a timely manner. 	<p>AIE's business is primarily in relation to the determination of Benchmarks. AIE is 100% owned by AT, and AT operates other businesses. The Board of Directors ensures that any potential conflicts of interest are considered and managed.</p> <p>Any changes to the ownership structure or control of AIE are reviewed and approved by the Board of Directors and are communicated to applicable stakeholders and/or regulators as needed.</p>
<p>4. Control Framework for Administrators</p> <p>An Administrator should implement an appropriate control framework for the process of determining and distributing the Benchmark. The control framework should be appropriately tailored to the materiality of the potential or existing conflicts of interest identified, the extent of the use of discretion in the Benchmark setting process and to the nature of Benchmark inputs and outputs. The control framework should be documented and available to relevant Regulatory Authorities, if any. A summary of its main features should be Published or Made Available to Stakeholders.</p>	<p>AIE has formally documented the control framework within the <i>Akros Index Engineering Risk and Compliance Policy</i>. This document is reviewed by the Board of Directors and the Compliance Officer.</p> <p>The framework addresses each element of the IOSCO Principles and is available to relevant Regulatory Authorities. A summary of its main features will be made available to Stakeholders on request.</p>
<p>This control framework should be reviewed periodically and updated as appropriate. The framework should address the following areas:</p>	<p>The control framework is considered and approved annually by the Board of Directors.</p>
<ul style="list-style-type: none"> a) Conflicts of interest in line with Principle 3 on conflicts of interests; 	<p>For Controls to address actual or potential conflicts of interest please refer to AIE's Relevant Control Measures on Principle 3.</p>

IOSCO Principle	AIE's Relevant Control Measures
b) Integrity and quality of Benchmark determination; i) Arrangements to ensure that the quality and integrity of Benchmarks is maintained, in line with principles 6 to 15 on the quality of the Benchmark and Methodology;	Benchmark determination in line with AIE's Relevant Control Measures on Principles 6 to 15.
ii) Arrangements to promote the integrity of Benchmark inputs, including adequate due diligence on input sources;	The process to check the integrity of Benchmark inputs, including adequate due diligence on input sources is carried out automatically on a daily basis. Furthermore, the Board of Directors convenes every two weeks, during which they review operational logs. These logs include summaries of any events connected to the review or reconstitution of indexes and the overall management of indexes. Throughout the entire process, personnel from data management and index management evaluate the reliability of input sources.
iii) Arrangements to ensure accountability and complaints mechanisms are effective, in line with principles 16 to 19; and	The Board of Directors reviews complaints received from Benchmark stakeholders. Further details are provided in AIE's Relevant Control Measures on Principle 16.
iv) Providing robust infrastructure, policies and procedures for the management of risk, including operational risk.	Potential operational risk events are identified through the formal risk assessment and mitigated by controls within the control framework.
c) Whistleblowing mechanism: Administrators should establish an effective whistleblowing mechanism to facilitate early awareness of any potential misconduct or irregularities that may arise. This mechanism should allow for external reporting of such cases where appropriate.	AIE follows the Company's <i>Whistleblowing Policy</i> which is applied across AIE and participates in the training program AIE provides to ensure the policy is fully adhered to by AIE employees.
d) Expertise: i) Ensuring Benchmark determinations are made by personnel who possess the relevant levels of expertise, with a process for periodic review of their competence; and ii) Staff training, including ethics and conflicts of interest training, and continuity and succession planning for personnel.	AIE ensures that employees with the necessary expertise are granted access to specific systems to support the Benchmark determination process. Assessing an individual's skills is a key component of the formal evaluation process, with records kept in the AIE performance management system. This process involves regular performance checks and identifies training needs. At present, AIE primarily offers on-the-job training for its employees. However, a structured training and evaluation program will be established for employees. Additionally, plans for succession and continuity will be prepared for various roles and levels within AIE.

IOSCO Principle	AIE's Relevant Control Measures
<p>Where a Benchmark is based on Submissions: Administrators should promote the integrity of inputs by:</p> <ul style="list-style-type: none"> a) Ensuring as far as possible that the Submitters comprise an appropriately representative group of participants taking into consideration the underlying Interest measured by the Benchmark; b) Employing a system of appropriate measures so that, to the extent possible, Submitters comply with the Submission guidelines, as defined in the Submitter Code of Conduct and the Administrators' applicable quality and integrity standards for Submission; c) Specifying how frequently Submissions should be made and specifying that inputs or Submissions should be made for every Benchmark determination; and d) Establishing and employing measures to effectively monitor and scrutinize inputs or Submissions. This should include pre-compilation or pre-publication monitoring to identify and avoid errors in inputs or Submissions, as well as <i>ex-post</i> analysis of trends and outliers. 	<p>None of the Akros Indices are based on Submissions, therefore, the additional requirements for Benchmarks based on Submissions do not apply.</p>
<p>5. Internal Oversight</p> <p>Administrators should establish an oversight function to review and provide challenge on all aspects of the Benchmark determination process. This should include consideration of the features and intended, expected or known usage of the Benchmark and the materiality of existing or potential conflicts of interest identified.</p> <p>The oversight function should be carried out either by a separate committee, or other appropriate governance arrangements. The oversight function and its composition should be appropriate to provide effective scrutiny of the Administrator. Such oversight function could consider groups of Benchmarks by type or asset class, provided that it otherwise complies with this Principle.</p>	<p>Responsibility for the internal oversight of AIE lies with the Product Governance Committee. The Product Governance Committee is responsible for approving new Benchmark methodologies and changes to existing methodologies and reports to the Board of Directors.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>An Administrator should develop and maintain robust procedures regarding its oversight function, which should be documented and available to relevant Regulatory Authorities, if any. The main features of the procedures should be Made Available to Stakeholders. These procedures should include:</p> <p>a) The terms of reference of the oversight function;</p> <p>b) Criteria to select members of the oversight function;</p> <p>The summary details of membership of any committee or arrangement charged with the oversight function, along with any declarations of conflicts of interest and processes for election, nomination or removal and replacement of committee members.</p>	<p>The Terms of Reference for the Product Governance Committee are available on the AIE website. The terms include the criteria used to select members. All members are subject to the conflicts of interest policies referred to in AIE's Relevant Control Measures on Principle 3 above.</p>
<p>The responsibilities of the oversight function include:</p> <p>a) Oversight of the Benchmark design;</p>	<p>The Product Governance Committee oversees Benchmark design.</p>
<p>i) Periodic review of the definition of the Benchmark and its Methodology;</p>	<p>AIE has a defined schedule for periodically reviewing the definitions of Benchmarks and their methodologies.</p>
<p>ii) Taking measures to remain informed about issues and risks to the Benchmark, as well as commissioning external reviews of the Benchmark (as appropriate);</p> <p>iii) Overseeing any changes to the Benchmark Methodology, including assessing whether the Methodology continues to appropriately measure the underlying Interest, reviewing proposed and implemented changes to the Methodology, and authorizing or requesting the Administrator to undertake a consultation with Stakeholders where known or its Subscribers on such changes as per Principle 12; and</p>	<p>AIE implemented the <i>Akros Index Engineering Policy for Benchmark Methodology Changes</i> which sets out the procedures for making material changes to its Methodologies. Please see AIE's Relevant Control Measures on Principle 12 for further information.</p>

IOSCO Principle	AIE's Relevant Control Measures
iv) Reviewing and approving procedures for termination of the Benchmark, including guidelines that set out how the Administrator should consult with Stakeholders about such cessation	This situation has not happened so far. However, AIE intends to release a statement about decommissioning an Index Series, with a summary available on the AIE website. The process will undergo review and receive approval from the Board of Directors. For more details, please refer to AIE's Relevant Control Measures on Principle 13.
b) Oversight of the integrity of Benchmark determination and control framework: i) Overseeing the management and operation of the Benchmark, including activities related to Benchmark determination undertaken by a third party;	The Product Governance Committee meets fortnightly to oversee the management and operation of Akros Indices and review operational reports including calculation issues, client complaints and Benchmark reviews.
ii) Considering the results of internal and external audits, and following up on the implementation of remedial actions highlighted in the results of these audits; and	Along with the Product Governance Committee, the Board of Directors reviews the results of internal and external audit reports and actions them as appropriate with a view to enhancing operational procedures. Please see AIE's Relevant Control Measures on Principle 17 for further information.
iii) Overseeing any exercise of Expert Judgement by the Administrator and ensuring Published Methodologies have been followed.	<p>The Product Governance Committee oversees the framework that allows for the use of Expert Judgement.</p> <p>This situation has not happened so far. However, use of Expert Judgement is defined in the <i>Exercise of Expert Judgement in Akros Indices</i> document and is reported retrospectively to the Board of Directors. The Board of Directors will consider whether the Benchmark methodology should be clarified in case of future events. Further details are provided in AIE's Relevant Control Measures on Principle 9.</p> <p>The Board of Directors reviews operational reports which highlight where any exceptions to the published methodology may have arisen and stipulates any remedial actions to be taken.</p>
Where conflicts of interests may arise in the Administrator due to its ownership structures or controlling interests, or due to other activities conducted by any entity owning or controlling the Administrator or by the Administrator or any of its affiliates: the Administrator should establish an independent oversight function which includes a balanced representation of a range of Stakeholders where known, Subscribers and Submitters, which is chosen to counterbalance the relevant conflict of interest.	The Board of Directors reviews the <i>Conflicts Register</i> which includes conflicts that may arise due to the ownership structure of controlling interests. To mitigate any potential conflicts, The Compliance Officer ensures that the Akros Indices are operated in the interests of a range of stakeholders including subscribers.

IOSCO Principle	AIE's Relevant Control Measures
<p>Where a Benchmark is based on Submissions: the oversight function should provide suitable oversight and challenge of the Submissions by:</p> <ul style="list-style-type: none"> a) Overseeing and challenging the scrutiny and monitoring of inputs or Submissions by the Administrator. This could include regular discussions of inputs or Submission patterns, defining parameters against which inputs or Submissions can be analyzed, or querying the role of the Administrator in challenging or sampling unusual inputs or Submissions; b) Overseeing the Code of Conduct for Submitters; c) Establishing measures to detect potential anomalous or suspicious Submissions and in case of suspicious activities, to report them, as well as any misconduct by Submitters of which it becomes aware to the relevant Regulatory Authorities, if any. 	<p>N/A – None of the Akros Indices are based on Submissions, therefore the additional requirements for Benchmarks based on Submissions do not apply.</p>
<p>6. Benchmark Design</p> <p>The design of the Benchmark should seek to achieve, and result in an accurate and reliable representation of the economic realities of the Interest it seeks to measure, and eliminate factors that might result in a distortion of the price, rate, index or value of the Benchmark.</p>	<p>The Benchmark design and the interest the Benchmark is intended to measure are detailed in the Benchmark's methodology documents.</p> <p>Each Benchmark's methodology includes eligibility criteria which seek to eliminate factors that may lead to distortions are considered in the design of each Benchmark.</p> <p>Other methods such as free float weightings to ensure the investability of the Benchmark are used as well in order to seek to achieve and result in an accurate and reliable representation of the economic realities of the Interest it seeks to measure.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>Benchmark design should take into account the following generic non-exclusive features, and other factors should be considered, as appropriate to the particular Interest:</p> <p>a) Adequacy of the sample used to represent the Interest;</p>	<p>Before launching a Benchmark, the Board of Directors approves the methodology and ensures that the universe of constituents adequately reflects the Benchmark's intended Interest. Furthermore, AIE will conduct an Annual Methodology Review, along with any necessary ad hoc reviews, under the oversight of the Board of Directors. These reviews are intended to reassess if the constituents still accurately represent the Interest.</p> <p>The Board of Directors also monitors the performance of the securities or constituents within its Benchmarks for any unusual activity and regularly checks to ensure the structural integrity and relevance of the methodology. This is to make certain that the Benchmark continues to meet its intended objective.</p>
<p>b) Size and liquidity of the relevant market (for example whether there is sufficient trading to provide observable, transparent pricing);</p> <p>c) Relative size of the underlying market in relation to the volume of trading in the market that references to the Benchmark;</p> <p>d) The distribution of trading among Market Participants (market concentration);</p>	<p>AIE considers i) size and liquidity of the relevant market, ii) relative size of the underlying market, iii) the distribution of trading among Market Participants in relations to markets that Akros Indices intend to measure when designing the Benchmark.</p> <p>During the design phase of a Benchmark, the Board of Directors examines factors associated with the Benchmark's marketability.</p>
<p>e) Market dynamics (e.g. to ensure that the Benchmark reflects changes to the assets underpinning a Benchmark).</p>	<p>The composition of Benchmarks is periodically reviewed to ensure that the Benchmarks remain representative of the market. In the period between index reviews, the methodology documents set out how Benchmark will respond to new issues, changes to the constituent weightings and constituent deletions, for example, bankruptcies and mergers for equities.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p data-bbox="203 272 421 296">7. Data Sufficiency</p> <p data-bbox="203 316 1039 395">The data used to construct a Benchmark determination should be sufficient to accurately and reliably represent the Interest measured by the Benchmark and should:</p> <ul style="list-style-type: none"> <li data-bbox="203 416 1055 496">a) Be based on prices, rates, indices or values that have been formed by the competitive forces of supply and demand in order to provide confidence that the price discovery system is reliable; and, <li data-bbox="203 517 1070 596">b) Be anchored by observable transactions entered into at arm's length between buyers and sellers in the market for the Interest the Benchmark measures in order for it to function as a credible indicator of prices, rates, indices or values. 	<p data-bbox="1108 272 1973 320">The Benchmark methodology documents describe the treatment of the data used in the Benchmark calculation.</p> <p data-bbox="1108 341 1982 453">Management of the data sourced from third parties is governed by the Board of Directors, which meets fortnightly and for which Terms of Reference have been set (for more information please refer to AIE's Relevant Control Measures on Principle 15)</p>

IOSCO Principle

AIE's Relevant Control Measures

This Principle requires that a Benchmark be based upon (i.e., anchored in) an active market having observable Bona Fide, Arms-Length Transactions. This does not mean that every individual Benchmark determination must be constructed solely of transaction data. Provided that an active market exists, conditions in the market on any given day might require the Administrator to rely on different forms of data tied to observable market data as an adjunct or supplement to transactions. Depending upon the Administrator's Methodology, this could result in an individual Benchmark determination being based predominantly, or exclusively, on bids and offers or extrapolations from prior transactions. This is further clarified in Principle 8.

Provided that subparagraph (a) and (b) above are met, Principle 7 does not preclude Benchmark Administrators from using executable bids or offers as a means to construct Benchmarks where anchored in an observable market consisting of Bona Fide, Arms-Length transactions.

This Principle also recognizes that various indices may be designed to measure or reflect the performance of a rule-based investment strategy, the volatility or behaviour of an index or market or other aspects of an active market. Principle 7 does not preclude the use of non-transaction data for such indices that are not designed to represent transactions and where the nature of the index is such that non-transactional data is used to reflect what the index is designed to measure. For example, certain volatility indices, which are designed to measure the expected volatility of an index of securities transactions, rely on non-transactional data, but the data is derived from and thus "anchored" in an actual functioning securities or options market.

Akros Indices are calculated on transactions executed on regulated trading venues and no discretion is exercised by the Administrator in determination process, consistent with Principle 8. This is explained in the methodology.

IOSCO Principle	AIE's Relevant Control Measures
<p>8. Hierarchy of Data Inputs</p> <p>An Administrator should establish and Publish or Make Available clear guidelines regarding the hierarchy of data inputs and exercise of Expert Judgment used for the determination of Benchmarks. In general, the hierarchy of data inputs should include:</p> <ul style="list-style-type: none"> a) Where a Benchmark is dependent upon Submissions, the Submitters' own concluded arms-length transactions in the underlying interest or related markets; b) Reported or observed concluded Arm's-length Transactions in the underlying interest; c) Reported or observed concluded Arm's-length Transactions in related markets; d) Firm (executable) bids and offers; and e) Other market information or Expert Judgments. 	<p>The data inputs for the Akros Indices are those required to fulfil the criteria laid out in each Benchmark's methodology documents to ensure the Benchmark meets the design objective. The methodology documents are published on the AIE website.</p> <p>Equity Benchmarks of the Akros Indices are based on traded prices sourced from regulated trading venues and hence use minimal Expert Judgment over data inputs. In exceptional circumstances, for example, where securities have stopped trading because they have been suspended, or because a market has been unexpectedly closed, the use of judgment is set out in the <i>Akros Index Engineering Corporate Actions Methodology</i> which is available on the AIE website.</p>
<p>Provided that the Data Sufficiency Principle is met (i.e., an active market exists), this Principle is not intended to restrict an Administrator's flexibility to use inputs consistent with the Administrator's approach to ensuring the quality, integrity, continuity and reliability of its Benchmark determinations, as set out in the Administrator's Methodology. The Administrator should retain flexibility to use the inputs it believes are appropriate under its Methodology to ensure the quality and integrity of its Benchmark. For example, certain Administrators may decide to rely upon Expert Judgment in an active albeit low liquidity market, when transactions may not be consistently available each day. IOSCO also recognizes that there might be circumstances (e.g., a low liquidity market) when a confirmed bid or offer might carry more meaning than an outlier transaction. Under these circumstances, non-transactional data such as bids and offers and extrapolations from prior transactions might predominate in a given Benchmark determination.</p>	<p>For Options Benchmarks, transaction prices and observable market inputs are generally used. For certain Benchmarks using synthetic options we derive theoretical option values using observable market inputs, parameters specified in Index Methodologies, and mathematical formulae.</p>
<p>9. Transparency of Benchmark Determinations</p> <p>The Administrator should describe and publish with each Benchmark determination, to the extent reasonable without delaying an Administrator publication deadline:</p>	<p>AIE provides and publishes various documents on its website that describe how Benchmark determinations are made.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>a) A concise explanation, sufficient to facilitate a Stakeholder's or Market Authority's ability to understand how the determination was developed, including, at a minimum, the size and liquidity of the market being assessed (meaning the number and volume of transactions submitted), the range and average volume and range and average of price, and indicative percentage of each type of market data that have been considered in a Benchmark determination; terms referring to the pricing Methodology should be included (i.e., transaction-based, spread-based or interpolated/extrapolated);</p> <p>b) A concise explanation of the extent to which and the basis upon which Expert Judgment if any, was used in establishing a Benchmark determination.</p>	<p>The methodology documents provide sufficient information to allow Stakeholders and Market Authorities to understand the process used to make determinations for each Benchmark.</p> <p>Subscribing clients are provided with data files that allow them to validate how the Benchmark has been determined. These include data files containing the constituent weights and prices for each Benchmark at the open and close of markets. Additional files provide advance notice of constituent changes including constituent additions and deletions and changes arising from corporate events; these files allow tracking portfolios to replicate the Benchmark.</p> <p>The extent to which Expert Judgment is used in the pricing of Benchmark constituents is set out in AIE's Relevant Control Measures on Principle 8.</p>
<p>10. Periodic Review</p> <p>The Administrator should periodically review the conditions in the underlying Interest that the Benchmark measures to determine whether the Interest has undergone structural changes that might require changes to the design of the Methodology. The Administrator also should periodically review whether the Interest has diminished or is non-functioning such that it can no longer function as the basis for a credible Benchmark.</p>	<p>The Board of Directors are responsible for methodologies that govern the relevant groups of the Akros Indices for which they oversee. Such responsibility involves meeting as often as appropriate at the Board of Director's discretion but at least annually, to evaluate risks to the Benchmark, assess whether the methodology continues to appropriately measure the underlying Interest and achieve its stated objective, and analyze a variety of criteria to help assess whether the data and methodology are still effective.</p>
<p>11. Content of Methodology</p> <p>The Administrator should document and Publish or Make Available the Methodology used to make Benchmark determinations. The Administrator should provide the rationale for adopting a particular Methodology. The Published Methodology should provide sufficient detail to allow Stakeholders to understand how the Benchmark is derived and to assess its representativeness, its relevance to particular Stakeholders, and its appropriateness as a reference for financial instruments.</p>	<p>The methodology documents detail the Benchmark determination process of each Akros Indices and provide sufficient information for users to understand how the Benchmark is constructed and maintained. These documents are published on AIE's website.</p>
<p>At a minimum, the Methodology should contain:</p> <p>a) Definitions of key terms;</p>	<p>Key terms are defined in each methodology documents.</p>

IOSCO Principle	AIE's Relevant Control Measures
b) All criteria and procedures used to develop the Benchmark, including input selection, the mix of inputs used to derive the Benchmark, the guidelines that control the exercise of Expert Judgment by the Administrator, priority given to certain data types, minimum data needed to determine a Benchmark, and any models or extrapolation methods;	The criteria and hierarchy of inputs are described in the published methodology documents.
c) Procedures and practices designed to promote consistency in the exercise of Expert Judgment between Benchmark determinations;	The Benchmark methodology documents are constructed so as to reduce subjectivity and limit Expert Judgment.
d) The procedures which govern Benchmark determination in periods of market stress or disruption, or periods where data sources may be absent (e.g. theoretical estimation models);	<p>External events can make it difficult or impossible for AIE clients to trade securities on certain markets. External operational events can also impact the supply of data sources used as part of a Benchmark calculation.</p> <p>The <i>Akros Index Engineering Policy of Tradability</i> outlines AIE's approach in these circumstances.</p>
e) The procedures for dealing with error reports, including when a revision of a Benchmark would be applicable;	Where an inaccuracy in a Benchmark determination is identified, AIE will follow the steps set out in the <i>Akros Index Engineering Recalculation Policy and Guidelines documents</i> based on the nature of the inaccuracy. Examples of actions which may be taken include recalculation, revision of the float adjustment or a restatement.
f) Information regarding the frequency for internal reviews and approvals of the Methodology. Where applicable, the Published Methodologies should also include information regarding the procedures and frequency for external review of the Methodology;	<p>The Akros Indices methodology documents are reviewed and approved by the Board of Directors on an annual basis.</p> <p>The frequency of review is included in the published methodology. Any required changes to the methodology will be in accordance with Principle 12.</p>
g) The circumstances and procedures under which the Administrator will consult with Stakeholders, as appropriate; and	The circumstances and procedures under which AIE consults with stakeholders on material changes to the Akros Indices are set out in the <i>Akros Index Engineering Consultation Policy</i> which is available on the AIE website.
h) The identification of potential limitations of a Benchmark, including its operation in illiquid or fragmented markets and the possible concentration of inputs.	Limitations of the Akros Indices are set out in the methodology documents where applicable. These limitations are primarily regarding the number of qualifying constituents and diversification.

IOSCO Principle	AIE's Relevant Control Measures
<p>Where a Benchmark is based on Submission, the additional Principle also applies: The Administrator should clearly establish criteria for including and excluding Submitters. The criteria should consider any issues arising from the location of the Submitter, if in a different jurisdiction to the Administrator. These criteria should be available to any relevant Regulatory Authorities, if any, and Published or Made Available to Stakeholders. Any provisions related to changes in composition, including notice periods should be made clear.</p>	<p>None of the Akros Indices are based on Submissions, therefore the additional requirements for Benchmarks based on Submissions do not apply.</p>
<p>12. Changes to the Methodology</p> <p>An Administrator should Publish or Make Available the rationale of any proposed material change in its Methodology, and procedures for making such changes. These procedures should clearly define what constitutes a material change, and the method and timing for consulting or notifying Subscribers (and other Stakeholders where appropriate, taking into account the breadth and depth of the Benchmark's use) of changes.</p> <p>Those procedures should be consistent with the overriding objective that an Administrator must ensure the continued integrity of its Benchmark determinations. When changes are proposed, the Administrator should specify exactly what these changes entail and when they are intended to apply.</p> <p>The Administrator should specify how changes to the Methodology will be scrutinized, by the oversight function.</p>	<p>AIE publishes on its website the <i>Akros Index Engineering Policy for Benchmark Methodology Changes</i> which sets out the procedures for making material changes to its Methodologies. The procedures include what constitutes a material change and the method and timing for consulting Subscribers and Stakeholders.</p> <p>All changes to the Methodologies of the Akros Indices are approved by the Board of Directors following the procedures described by AIE's Relevant Control Measures on Principle 10. Approved methodology changes to indexes are announced to the market through Technical Notices and Client Notices which include the rationale underlying the changes and the timetable for their implementation.</p> <p>Depending on the impact of a change, implementation may be immediate or may be preceded by advance notification.</p> <p>Changes to the procedures used to conduct Benchmark reviews will be announced typically three months in advance of implementation to allow users time to prepare.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>The Administrator should develop Stakeholder consultation procedures in relation to changes to the Methodology that are deemed material by the oversight function, and that are appropriate and proportionate to the breadth and depth of the Benchmark's use and the nature of the Stakeholders. Procedures should:</p> <ul style="list-style-type: none"> a) Provide advance notice and a clear timeframe that gives Stakeholders sufficient opportunity to analyze and comment on the impact of such proposed material changes, having regard to the Administrator's assessment of the overall circumstances; and b) Provide for Stakeholders' summary comments, and the Administrator's summary response to those comments, to be made accessible to all Stakeholders after any given consultation period, except where the commenter has requested confidentiality. 	<p>Material changes to the Index methodologies follow <i>Akros Index Engineering Consultation Policy</i> which is made publicly available on the AIE website.</p> <p>The <i>Akros Index Engineering Consultation Policy</i> defines a "material change" and sets out the process by which AIE makes such changes.</p> <p>AIE prepares proposals for material changes which are presented to the Board of Directors for consideration and approval. For custom indices, or in cases where only a limited number of Stakeholders or Subscribers are impacted, the affected entities are directly consulted. Otherwise, a public consultation is performed where feedback on the proposed change is sought.</p> <p>The consultation period is specified in the consultation notice.</p> <p>AIE reviews the feedback and presents the recommended changes and consultation findings to the Board of Directors. All adopted changes are reviewed and approved by the Board of Directors prior to implementation.</p> <p>Details of the finalized changes and their timeline for implementation are publicly announced to the market on the AIE website.</p> <p>Identities of respondents are kept confidential unless otherwise advised. Immaterial changes to the methodology, which include clarifications in the documentation or changes that are cosmetic or minor in nature, are not published for consultation, but are announced to market participants using the same process.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>13. Transition</p> <p>Administrators should have clear written policies and procedures, to address the need for possible cessation of a Benchmark, due to market structure change, product definition change, or any other condition which makes the Benchmark no longer representative of its intended Interest. These policies and procedures should be proportionate to the estimated breadth and depth of contracts and financial instruments that reference a Benchmark and the economic and financial stability impact that might result from the cessation of the Benchmark. The Administrator should take into account the views of Stakeholders and any relevant Regulatory and National Authorities in determining what policies and procedures are appropriate for a particular Benchmark.</p> <p>These written policies and procedures should be Published or Made Available to all Stakeholders.</p>	<p>AIE intends to release a statement about decommissioning an Index Series, with a summary available on the AIE website. The policy sets out the reasons that might cause AIE to cease publication of a Benchmark, for example, an inability to source adequate input data or the lack of revenues associated with a Benchmark.</p> <p>AIE will follow a structured process to consider and then communicate the decision to terminate a Benchmark. Any proposal for the decommissioning of a Benchmark is considered by the Board of Directors. If the Board of Directors is satisfied that the Benchmark should be decommissioned, AIE will follow the documented procedure. This includes:</p> <ul style="list-style-type: none"> ▪ AIE should use reasonable endeavors to establish whether the Benchmark is being used as a reference for financial products or financial instruments, or as the basis of investment mandates; ▪ AIE should usually and where possible provide a minimum of three months' notice of its intention to terminate the calculation and publication of a Benchmark to allow stakeholders that may be affected to make representations to AIE; ▪ AIE should issue a reminder notice one month before the decommissioning date; ▪ AIE should issue a final notice one week before the decommissioning date; and ▪ The day after the decommissioning, AIE should issue a completion notice to confirm the Benchmark has been decommissioned and also complete various administrative steps such as the removal of the daily files from the live production environment.
<p>Administrators should encourage Subscribers and other Stakeholders who have financial instruments that reference a Benchmark to take steps to make sure that:</p> <p>a) Contracts or other financial instruments that reference a Benchmark, have robust fall-back provisions in the event of material changes to, or cessation of, the referenced Benchmark; and</p>	<p>AIE's license agreements with its clients provide for the termination of Benchmarks, typically on provision of up to three months' notice. The notice period may be shorter, or immediate, if (i) AIE service is dependent on the provision of data from an external supplier that ceases to become available (ii) AIE reasonably believes termination or suspension of its services is necessary to maintain the security or integrity of such services; (iii) AIE services become illegal or contrary to any laws or regulations. AIE also retains the right to change the composition or method of calculation of its Benchmarks, or update its Benchmarks, at any time.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>b) Stakeholders are aware of the possibility that various factors, including external factors beyond the control of the Administrator, might necessitate material changes to a Benchmark.</p>	<p>Methodology documents are publicly available on the AIE website and make stakeholders aware that external factors may necessitate material changes to a Benchmark.</p>
<p>Administrators' written policies and procedures to address the possibility of Benchmark cessation could include the following factors, if determined to be reasonable and appropriate by the Administrator:</p> <p>a) Criteria to guide the selection of a credible, alternative Benchmark such as, but not limited to, criteria that seek to match to the extent practicable the existing Benchmark's characteristics (e.g., credit quality, maturities and liquidity of the alternative market), differentials between Benchmarks, the extent to which an alternative Benchmark meets the asset/liability needs of Stakeholders, whether the revised Benchmark is investable, the availability of transparent transaction data, the impact on Stakeholders and impact of existing legislation;</p>	<p>AIE's procedures as set out in the <i>Akros Index Engineering Index Series Decommissioning Statement</i> provide for consideration as to whether an alternative Benchmark may be suitable for any user. The decommissioning proposal should include:</p> <ul style="list-style-type: none"> ▪ Reasons for proposed decommissioning; ▪ Details as to any identified users of the products; ▪ Alternative benchmarks that could be used by identified users of the products; ▪ Consideration of running the benchmark in parallel; and ▪ Proposed timescales.

IOSCO Principle	AIE's Relevant Control Measures
<ul style="list-style-type: none"> b) The practicality of maintaining parallel Benchmarks (e.g., where feasible, maintain the existing Benchmark for a defined period of time to permit existing contracts and financial instruments to mature and publish a new Benchmark) in order to accommodate an orderly transition to a new Benchmark; c) The procedures that the Administrator would follow in the event that a suitable alternative cannot be identified; d) In the case of a Benchmark or a tenor of a Benchmark that will be discontinued completely, the policy defining the period of time in which the Benchmark will continue to be produced in order to permit existing contracts to migrate to an alternative Benchmark if necessary; and e) The process by which the Administrator will engage Stakeholders and relevant Market and National Authorities, as appropriate, in the process for selecting and moving towards an alternative Benchmark, including the timeframe for any such action commensurate with the tenors of the financial instruments referencing the Benchmarks and the adequacy of notice that will be provided to Stakeholders. 	<p>The Board of Director is required to consider whether it would be practicable to maintain the Benchmark to be decommissioned in parallel with a successor or alternative for a period of time to allow users to make the transition to that successor or alternative Benchmark.</p> <p>The procedures also provide for communication with external stakeholders and include a minimum of three months' notice to allow users to transition to a successor or an alternative Benchmark, and/or make representations to AIE.</p>

14. Submitter Code of Conduct

Where a Benchmark is based on Submissions, the following additional Principle also applies:

The Administrator should develop guidelines for Submitters (“Submitter Code of Conduct”), which should be available to any relevant Regulatory Authorities, if any and Published or Made Available to Stakeholders.

The Administrator should only use inputs or Submissions from entities which adhere to the Submitter Code of Conduct and the Administrator should appropriately monitor and record adherence from Submitters. The Administrator should require Submitters to confirm adherence to the Submitter Code of Conduct annually and whenever a change to the Submitter Code of Conduct has occurred.

The Administrator’s oversight function should be responsible for the continuing review and oversight of the Submitter Code of Conduct.

The Submitter Code of Conduct should address:

- a) The selection of inputs;
- b) Who may submit data and information to the Administrator;
- c) Quality control procedures to verify the identity of a Submitter and any employee(s) of a Submitter who report(s) data or information and the authorization of such person(s) to report market data on behalf of a Submitter;
- d) Criteria applied to employees of a Submitter who are permitted to submit data or information to an Administrator on behalf of a Submitter;
- e) Policies to discourage the interim withdrawal of Submitters from surveys or Panels;
- f) Policies to encourage Submitters to submit all relevant data; and
- g) The Submitters’ internal systems and controls, which should include:
 - i. Procedures for submitting inputs, including Methodologies to determine the type of eligible inputs, in line with the Administrator’s Methodologies;
 - ii. Procedures to detect and evaluate suspicious inputs or transactions, including intergroup transactions, and to ensure the Bona Fide nature of such inputs, where appropriate;
 - iii. Policies guiding and detailing the use of Expert Judgment, including

None of the Akros Indices are based on Submissions. The input data used by AIE in the indices is readily available and not solely provided to AIE for the purposes of determining a Benchmark.

IOSCO Principle	AIE's Relevant Control Measures
<p>documentation requirements;</p> <p>iv. Record keeping policies;</p> <p>v. Pre-Submission validation of inputs, and procedures for multiple reviews by senior staff to check inputs;</p> <p>vi. Training, including training with respect to any relevant regulation (covering Benchmark regulation or any market abuse regime);</p> <p>vii. Suspicious Submission reporting;</p> <p>viii. Roles and responsibilities of key personnel and accountability lines;</p> <p>ix. Internal sign off procedures by management for submitting inputs;</p> <p>x. Whistle blowing policies (in line with Principle 4); and</p> <p>xi. Conflicts of interest procedures and policies, including prohibitions on the Submission of data from Front Office Functions unless the Administrator is satisfied that there are adequate internal oversight and verification procedures for Front Office Function Submissions of data to an Administrator (including safeguards and supervision to address possible conflicts of interests as per paragraphs (v) and (ix) above), the physical separation of employees and reporting lines where appropriate, the consideration of how to identify, disclose, manage, mitigate and avoid existing or potential incentives to manipulate or otherwise influence data inputs (whether or not in order to influence the Benchmark levels), including, without limitation, through appropriate remuneration policies and by effectively addressing conflicts of interest which may exist between the Submitter's Submission activities (including all staff who perform or otherwise participate in Benchmark Submission responsibilities), and any other business of the Submitter or of any of its affiliates or any of their respective clients or customers.</p>	

IOSCO Principle	AIE's Relevant Control Measures
<p>15. Internal Controls over Data Collection</p> <p>When an Administrator collects data from any external source the Administrator should ensure that there are appropriate internal controls over its data collection and transmission processes. These controls should address the process for selecting the source, collecting the data and protecting the integrity and confidentiality of the data. Where Administrators receive data from employees of the Front Office Function, the Administrator should seek corroborating data from other sources.</p>	<p>AIE maintains quality assurance processes and procedures for the collection of its data/inputs to maintain integrity and confidentiality. The quality assurance processes and procedures include; (1) the selection and monitoring of data/inputs, (2) the comparison of inputs from different data sources (when available), (3) the analysis of detected incidents/errors, (if any) and (4) the monitoring and review of output data provided by Benchmark calculation agents (e.g., Benchmark level data and percentage change in Benchmark value day over day to check for anomalies).</p>
<p>16. Complaints Procedures</p> <p>The Administrator should establish and Publish or Make Available a written complaints procedures policy, by which Stakeholders may submit complaints including concerning whether a specific Benchmark determination is representative of the underlying Interest it seeks to measure, applications of the Methodology in relation to a specific Benchmark determination(s) and other Administrator decisions in relation to a Benchmark determination.</p>	<p>AIE has established and documented the <i>Akros Index Engineering Benchmark Determination Complaints-Handling Policy</i> which is published on the AIE website and that sets out the steps to be taken on receipt of a complaint or query in relation to any matter including:</p> <ul style="list-style-type: none"> ▪ Benchmark determination issues including the application of the approved methodology; ▪ The suitability of the Benchmark in measuring the underlying interest; and ▪ Service delivery issues.
<p>The complaints procedures policy should:</p> <p>a) Permit complaints to be submitted through a user-friendly complaints process such as an electronic Submission process;</p>	<p>The <i>Akros Index Engineering Benchmark Determination Complaints-Handling Policy</i> defines how stakeholders can submit a complaint or query to AIE and sets out AIE's procedures for resolving a complaint or answering a query.</p> <p>AIE also has a dedicated email address (akros@index.engineering) to which stakeholders can submit a complaint or query.</p>
<p>b) Contain procedures for receiving and investigating a complaint made about the Administrator's Benchmark determination process on a timely and fair basis by personnel who are independent of any personnel who may be or may have been involved in the subject of the complaint, advising the complainant and other relevant parties of the outcome of its investigation within a reasonable period and retaining all records concerning complaints;</p>	<p>AIE has a Compliance Officer who monitors the email inbox and responds to and/or escalates complaints and queries received in accordance with the <i>Akros Index Engineering Benchmark Determination Complaints-Handling Policy</i>. The Compliance Officer is independent of the teams involved in the Benchmark determination process.</p> <p>All complaints and queries are logged on a dedicated system for issue tracking and reference.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>c) Contain a process for escalating complaints, as appropriate, to the Administrator's governance body; and</p>	<p>The <i>Akros Index Engineering Benchmark Determination Complaints-Handling Policy</i> contains escalation procedures which are dependent upon the nature of the complaint or query. Complaints are received by the whole employees of AIE and reviewed for their potential severity and managed and escalated in accordance with the policy. A summary of any complaint is considered at the Board of Directors.</p>
<p>d) Require all documents relating to a complaint, including those submitted by the complainant as well as the Administrator's own record, to be retained for a minimum of five years, subject to applicable national legal or regulatory requirements.</p>	<p>All correspondence and documents relating to complaints and queries are required to be logged and stored and the records are kept for a minimum of five years. <i>Akros Index Engineering Benchmark Determination Complaints-Handling Policy</i> applies to all complaints and queries raised by stakeholders.</p>
<p>Disputes about a Benchmarking determination, which are not formal complaints, should be resolved by the Administrator by reference to its standard appropriate procedures. If a complaint results in a change in a Benchmark determination, that should be Published or Made Available to Subscribers and Published or Made Available to Stakeholders as soon as possible as set out in the Methodology.</p>	<p>During the resolution of a Benchmark determination issue, clients are provided with regular updates. Responsibility for closing a complaint rests with the Compliance Officer which allows for follow-up with the complainant as to how the issue has been resolved. If, following the investigation of a complaint, AIE determines that the Benchmark in question should be recalculated or restated, the <i>Akros Index Engineering Benchmark Determination Complaints-Handling Policy</i> requires that a notice be issued to the market in line with AIE's standard operating procedures.</p>
<p>17. Audits The Administrator should appoint an independent internal or external auditor with appropriate experience and capability to periodically review and report on the Administrator's adherence to its stated criteria and with the Principles. The frequency of audits should be proportionate to the size and complexity of the Administrator's operations.</p>	<p>AIE will be undertaking periodic reviews of its business as part of its 3-year internal audit cycle. The program of reviews covers the governance and operational processes for important areas of the business. The reviews are prepared for internal purposes as well as in support of AIE's compliance with the IOSCO Principles and any other regulatory framework. Results of the internal audit reviews will be considered by the AIE Oversight Committee.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>Where appropriate to the level of existing or potential conflicts of interest identified by the Administrator (except for Benchmarks that are otherwise regulated or supervised by a National Authority other than a relevant Regulatory Authority), an Administrator should appoint an independent external auditor with appropriate experience and capability to periodically review and report on the Administrator's adherence to its stated Methodology. The frequency of audits should be proportionate to the size and complexity of the Administrator's Benchmark operations and the breadth and depth of Benchmark use by Stakeholders.</p>	<p>AIE has engaged KPMG to carry out a reasonable assurance review with regard to their 2023 Statement of Adherence to the IOSCO Principles for Financial Benchmarks.</p>
<p>18. Audit Trail</p> <p>Written records should be retained by the Administrator for five years, subject to applicable national legal or regulatory requirements on:</p> <p>a) All market data, Submissions and any other data and information sources relied upon for Benchmark determination;</p>	<p>All data relied upon for AIE end-of-day Benchmark determination is retained for at least five years. Backups are taken daily and stored. Real-time data is kept for a minimum of two weeks.</p>
<p>b) The exercise of Expert Judgment made by the Administrator in reaching a Benchmark determination;</p>	<p>AIE stores and records documentation in relation to areas where Expert Judgment is used. Such judgment is documented in relevant Technical Notices, Client Notices and data files.</p>
<p>c) Other changes in or deviations from standard procedures and Methodologies, including those made during periods of market stress or disruption;</p>	<p>In the event of a failure or delay in the receipt of input data, or if there is a disruption in the market affecting any of the indices, such incidents are logged, escalated and retained in accordance with <i>Akros Index Engineering Incident Management Policy</i>. Any changes in or deviations from standard procedures and methodologies are documented and stored in the relevant index calculation system in accordance with <i>Akros Index Engineering Record Retention Policy</i>.</p>
<p>d) The identity of each person involved in producing a Benchmark determination; and</p>	<p>The calculation system used to determine the Indices log the identity of users who have access and also log the actions users take throughout the day.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>e) Any queries and responses relating to data inputs.</p> <p>If these records are held by a Regulated Market or Exchange the Administrator may rely on these records for compliance with this Principle, subject to appropriate written record sharing agreements.</p>	<p>All queries and responses relating to data inputs are logged and tracked internally by AIE staff and retained. All actions, decisions and responses are retained in the central customer contact system.</p>
<p>When a Benchmark is based on Submissions, the following additional Principle also applies:</p> <p>Submitters should retain records for five years subject to applicable national legal or regulatory requirements on:</p> <ul style="list-style-type: none"> a) The procedures and Methodologies governing the Submission of inputs; b) The identity of any other person who submitted or otherwise generated any of the data or information provided to the Administrator; c) Names and roles of individuals responsible for Submission and Submission oversight; d) Relevant communications between submitting parties; e) Any interaction with the Administrator; f) Any queries received regarding data or information provided to the Administrator; g) Declaration of any conflicts of interests and aggregate exposures to Benchmark related instruments; h) Exposures of individual traders/desks to Benchmark related instruments in order to facilitate audits and investigations; and i) Findings of external/internal audits, when available, related to Benchmark Submission remedial actions and progress in implementing them. 	<p>None of the Akros Indices are based on Submissions, therefore the additional requirements for Benchmarks based on Submissions do not apply.</p>

IOSCO Principle	AIE's Relevant Control Measures
<p>19. Cooperation with Regulatory Authorities</p> <p>Relevant documents, Audit Trails and other documents subject to these Principles shall be made readily available by the relevant parties to the relevant Regulatory Authorities in carrying out their regulatory or supervisory duties and handed over promptly upon request.</p>	<p>AIE confirms that all relevant documents and audit trails can be made available to relevant Regulatory Authorities on request.</p>

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