

EU Benchmarks Regulation

Benchmark Statement

In respect of the

Credit Suisse International: Equities Family of Benchmarks

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Introduction

Credit Suisse International (“**CS**”) administers a number of indices that it considers to be “benchmarks” within the scope of Regulation (EU) 2016/1011 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (the “**EU BMR**”).

CS has grouped the benchmarks that it administers into a number of “families” for the purposes of applying certain provisions of the EU BMR. This document constitutes the “Benchmark Statement” under Article 27 of the EU BMR in respect of CS’s “equities” family of benchmarks (each benchmark in such family, an “**Equities Benchmark**”) and provides the information required by the EU BMR to be included in such statement. The methodology of each Equities Benchmark is set out in the relevant Index Rules applicable to such Equities Benchmark and such Index Rules are available to CS (acting in other capacities), its affiliates, persons who have entered into licencing agreements to use the relevant Equities Benchmark and any other person to whom the administrator is required to make such Index Rules available to under the EU BMR. Licenced users of an Equities Benchmark, their counterparties and investors should carefully read and consider the relevant Index Rules prior to making any decision to use such Equities Benchmark or to investing in products referencing such Equities Benchmark.

Any person who has entered into a licencing agreement to use a CS administered benchmark and any of its respective counterparties and investors (including prospective counterparties and investors) can contact CS in writing at its principal office at 1 Cabot Square, Canary Wharf, London E14 4QJ, United Kingdom, Attention: Benchmark Administration Manager if they are unsure whether the benchmark they are using (or wants to potentially use) is an Equities Benchmark (for which this document is relevant) or is a benchmark belonging to another CS family of benchmarks.

Capitalised terms used in this Benchmark Statement, which are not otherwise defined, shall have the same meaning as set out in the Appendix 1 hereto (“Definitions for key terms relating to the Equities Benchmarks”).

1. **ISINs**

There are currently no ISINs allocated to any of the Equities Benchmarks.

2. **Contributions of Input Data**

None of the Equities Benchmarks are determined using Contributions of Input Data.

3. **Economic reality measured by the Equities Benchmarks**

Each Equities Benchmark is designed to measure the performance of an investment strategy that provides exposure to a notional portfolio comprised of Equity Instruments systematically rebalanced in accordance with predefined rules.

The types of Equity Instruments that may comprise the portfolio from time to time are set out in the relevant Index Rules and may mean that (i) the portfolio would be linked to specified markets or specified geographical boundaries or may be global and (ii) the instruments in the portfolio provide long only, short only or both long and short exposures to equities. Please refer to the Index Rules for the relevant Equities Benchmark for a description of the geographical boundaries of the economic reality measured by such Equities Benchmark and whether the economic reality consists of long only, short only or long and short positions.

In addition, particular Equities Benchmarks may include features that use non-Equity Instruments Input Data, including but not limited to, currency rates and interest rates. These features do not alter the economic reality measured by the Equities Benchmark but provide a variation in the manner in which such economic reality is measured. For example, measuring the performance in a currency other than the currency of the portfolio of Equity Instruments or measuring a leveraged exposure to the portfolio of Equity Instruments or a different type of performance.

4. **Definitions of Key Terms**

The definitions for all key terms relating to each Equities Benchmark covered by this Benchmark Statement are provided in the Appendix 1 to this document.

5. **Methodology**

The Equities Benchmarks are rules-based indices developed by CS that are designed to implement, and measure the performance of, a particular investment strategy. The exercise of discretion is limited to exceptional circumstances relating to market disruption or market changes outside the control of CS. The rationale for adopting the methodology of each Equities Benchmark is to create a measure of the performance of a specific, systematically rebalanced, notional portfolio and to enable investors to take a synthetic exposure to such notional portfolios when investing in products linked to the Equities Benchmark.

The methodology of each Equities Benchmark and of each new benchmark to be added as an Equities Benchmark, is subject to the approval by CS's Benchmark Governance Committee (or any successor in such role) ("**BGC**") in accordance with a formalised internal process to ensure ongoing compliance with the requirements of the EU BMR. This internal process stipulates that the BGC is provided with the details of the new benchmark, including (but not limited to) the investment strategy, operational risks and control framework for the new benchmark, its index rules and risk disclosures, an assessment of the sufficiency, reliability and verifiability of the Input Data. The BGC members include representatives of CS's index calculation team, product structuring team, general counsel division and compliance division.

The methodology of each Equities Benchmark is subject to an annual review by the BGC to determine if any recent events would have impacted the quality or integrity of the relevant Equities Benchmark methodology. Reviews may also be conducted on an ad hoc basis where the BGC considers it desirable or necessary to do so, including in response to specific events or otherwise. Specific events include (without limitation) any index errors, index disruptions, changes in the applicable legal or regulatory environment; any feedback from stakeholders, challenges, complaints; and/or any material audit findings or findings or recommendations from CS's Benchmark Oversight Committee (or any successor in such role).

6. *Criteria and procedures used to determine the Equities Benchmark Level*

The Equities Benchmarks are rules-based indices and are designed not to rely on Expert Judgement or discretionary determinations in ordinary circumstances. Each Equities Benchmark is determined by CS collecting the Input Data necessary for such determination and specified in the relevant methodology and applying the rules prescribed by the methodology to calculate the performance of the relevant notional portfolio. The calculated performance may be subject to further predefined and transparent adjustments, which may include (but are not limited to) deduction of fees, costs associated with currency hedges included in the portfolio, currency conversions and costs associated with notional borrowing in relation to leveraged portfolios.

The Equity Instruments that comprise the relevant notional portfolio from time to time are determined periodically on the basis of pre-defined rules set out in the relevant Index Rules. Once the Equity Instruments that comprise the relevant notional portfolio at the relevant time are determined, their weightings from time to time are determined based on pre-defined rules set out in the relevant Index Rules.

7. *Input Data*

The Input Data for the majority of Equities Benchmarks comprises only externally sourced Input Data. In a limited number of Equities Benchmarks, some Input Data may be internally sourced. Externally sourced Input Data include:

- (a) transaction data i.e. executed prices relating to certain Equity Instruments traded on exchanges;
- (b) committed quotes relating to certain Equity Instruments traded on exchanges;
- (c) in relation to interest rates and exchange rates, the published levels of the interest rate or currency benchmarks providing such rates;
- (d) in relation to mutual funds, the net asset values published by the relevant mutual funds or their respective administrators; and
- (e) in relation to any indices (whether sponsored or administered by CS, any of its affiliates, or any third party entity), the levels published by the respective administrator or sponsor of such indices.

CS sources the above Input Data from third party data vendors that it considers reputable and does not classify any of the above data as regulated data but classifies it as readily available.

In certain cases, an Equities Benchmark may use internally sourced Input Data. Where this is the case the relevant Index Rules will indicate when Input Data is internally sourced.

CS may change the Data Sources it uses to source the Input Data from time to time in accordance with CS's internal governance procedures, provided that any new data provider or Data Source meets CS's requirements.

The Index Rules for each Equities Benchmark specify the single Input Data type required to be collected and observed for each relevant component for the determination of such Equities Benchmark. If it is impossible to collect and observe the required Input Data type for a component due to market disruption, this would result in lack of sufficient Input Data to determine the Equities Benchmark according to the methodology. In such cases, CS may use Expert Judgement to estimate relevant values or adjust prices and values or may (i) postpone or suspend the determination of the relevant Equities Benchmark or (ii) supplement, amend (in whole or in part), revise, rebalance or withdraw the relevant Equities Benchmark.

8. *Insufficient Input Data, Insufficient or Inaccurate Data Sources*

Market disruption may lead to insufficient Input Data and/or insufficient or inaccurate Data Sources.

Events that may lead to market disruption include, (but are not limited to), any suspension of or limitation imposed on trading by any relevant exchange or other trading facility, the closure of any relevant exchange or other trading facility before its scheduled closing time, changes in the liquidity, trading volume, terms or listing of any Equity Instrument comprised in the relevant portfolio, the failure of any Data Source to publish the Input Data or the level published is significantly different to the level of such data prevailing in the market.

In addition to the cases of market disruption, other factors that may lead to lack of sufficient Input Data or to Input Data that is not consistent with the assumptions made when such Input Data was selected as the basis for the calculation of the Equities Benchmark, or to the Input Data being unreliable include, (but are not limited to),: (a) a material change in the content, composition, constitution of, or in the formula for or method of, calculating relevant Input Data, (b) any other event that disrupts or impairs the ability of market participants in general to effect transactions in, or obtain market values for, the relevant instrument, (c) any event that, in the determination of CS, has a material adverse effect on the ability of a market participant to establish, maintain, value, rebalance or unwind a hedge position in relation to an investment product linked to the Equities Benchmark, including an Equity Instrument comprising the portfolio measured by the Equities Benchmark, and (d) any event resulting in a breakdown in any means of communication or a procedure normally used to enable the determination of the Equities Benchmark.

The methodology of each Equities Benchmark specifies the relevant market disruption or other event that would lead to lack of sufficient Input Data or where the Data Sources may be insufficient, inaccurate or unreliable.

In addition, while CS intends to use well-established and reputable data providers to source its Input Data, there is a risk that this Input Data may be inaccurate, delayed or not up to date. There is also a risk that while the Input Data is accurate, the data feed to CS is impaired.

9. *Extrapolation*

CS may use extrapolation to determine the value of over-the-counter derivatives linked to equity underlyings which have a different tenor to the maturities for which a value is available using externally sourced data. The extrapolation method applies pre-defined formulae to externally sourced Input Data to generate an extrapolated value.

10. *Procedures for determining the Equities Benchmark in periods of stress*

In the limited circumstances mentioned above, the BGC will either make the decision or approve the decision on whether to (i) suspend or delay the calculation and publication of the Equity Benchmark or (ii) determine the Equity Benchmark on the basis of estimated or adjusted data and publish the respective Level or (iii) supplement, amend (in whole or in part), revise, rebalance or withdraw the Equity Benchmark. Such decision and approval would be made in accordance with the criteria relating to the exercise of discretion described under “Exercise of discretion” below.

11. *Limitations of the Equities Benchmarks*

The market disruption and other events that may lead to the Input Data or Data Sources being insufficient, inaccurate or unreliable or to the Input Data being not consistent with the assumptions made when such Input Data was selected as the basis for the calculation of the Equities Benchmark may compromise the reliability of the Equities Benchmark.

12. *External and other factors may necessitate changes or cessation of the Equities Benchmark*

CS provides notice that factors, including external factors beyond the control of the administrator, may necessitate changes to, or the cessation of, any Equities Benchmark.

13. *Exercise of discretion*

CS may exercise discretion to:

- (a) determine whether a market disruption or another event has occurred that may lead to the Input Data being insufficient or to such data being not consistent with the assumptions made when such Input Data was selected as the basis for the calculation of the Equities Benchmark;
- (b) estimate or adjust the level of Input Data when CS has determined that one or more of the above events have occurred;
- (c) address other unscheduled events which may make it impossible to calculate the Equities Benchmark;
- (d) decide whether to (i) estimate or adjust the level of Input Data in the above circumstances or (ii) suspend or delay the calculation and publication of the Equities Benchmark or (iii) supplement, amend (in whole or in part), revise, rebalance the Equities Benchmark;
- (e) decide how to address errors in Input Data or in the determination of the Equities Benchmark, including whether to restate the Level of the Equities Benchmark in such circumstances;
- (f) decide how to address any omissions or ambiguities in the relevant Index Rules; and
- (g) decide whether to terminate the Benchmark.

If the need to exercise discretion arises, CS will do so in a way that minimises potential or actual conflicts of interests and will act in good faith and in a commercially reasonable manner consistently with (a) the objective of the Equities Benchmark; (b) any previous exercise of discretion in the same or similar instances; and (c) where possible, across Equities Benchmarks in relation to the affected asset class or instrument. Where there is a corresponding regulatory obligation, CS shall also take into account whether fair treatment

is achieved by the exercise of discretion in accordance with applicable regulatory obligations.

Where CS is entitled to exercise discretion, any such exercise will be either made by the BGC or be subject to the approval of the BGC.

14. *Changes to, or cessation of, an Equities Benchmark may impact financial contracts, financial instruments or investment funds that reference that Equities Benchmark*

CS may decide to make modifications to the Equities Benchmark, or permanently cancel and discontinue calculating and publishing an Equities Benchmark (in compliance with applicable law and regulation) at any time.

Changes to, or the cessation of, an Equities Benchmark may have an impact on the financial contracts and financial instruments that reference the Equities Benchmark or the measurement of the performance of investment funds.

Users should check that the contractual terms of such financial contracts and financial instruments contain appropriate fallback provisions.

15. *Error procedures*

CS has a number of procedures and processes in place which are designed to ensure the accuracy and reliability of its published Equities Benchmark Levels. Notwithstanding these procedures and processes, errors in Input Data or in the determination of a Benchmark may sometimes occur. When an error due to the correction by a third party Data Source of Input Data is identified and the impact is below a certain pre-defined threshold, the Level of the Equities Benchmark is restated. In all other cases, the restatement of the Level of the Equities Benchmark is subject to the approval of the BGC or the chairperson of the BGC. The approval of the BGC is also required in relation to any decision not to restate the Level of the Equities Benchmark upon the discovery of any issue or error that would normally give rise to a restatement. All restatements of Equities Benchmarks are reported to the BGC as and when they occur and are then recorded and (if necessary), discussed at the next periodic BGC meeting (usually held monthly).

When determining whether to approve a restatement, the BGC and its members will take into account, among other factors, any applicable FCA conduct rules, CS's conduct and ethics standards, proportionality and the impact on users.

16. *Classification of benchmarks*

CS has determined that each Equities Benchmark is a non-significant benchmark in accordance with Article 3(1)(27) EU BMR.

17. *ESG factors*

For the purposes of Article 27(2)(a) of the EU BMR, as amended by Regulation (EU) 2019/2089 of the European Parliament and of the Council of 27 November 2019 (the "**Low Carbon Benchmark Regulation**") no Equities Benchmark pursues environmental, social and governance ("**ESG**") objectives except those Equities Benchmarks expressly identified in Appendix 2 to this Benchmark Statement (and, in respect of any Equities Benchmark expressly identified in Appendix 2, only to the extent set out therein).

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Appendix 1 – Definitions for key terms relating to the Equities Benchmarks

This Appendix 1 sets out the definitions in relation to the terms which CS considers to be “key terms” for the Equities Benchmarks covered by this Benchmark Statement.

The terms defined herein will not necessarily apply to each Equities Benchmark within the Equities Benchmarks family; nor are these terms intended to be exhaustive in respect of any of the Equities Benchmarks, as there may be additional terms relating to (amongst other things) the determination, calculation, disruption, governance, summary description and/or risk factors of any given Equities Benchmark which are not included below. In addition, some of these terms may be defined differently within the individual Index Rules, in which case the meaning used in the Index Rules shall prevail. Further reference should therefore also be had to the Index Rules of the relevant Equities Benchmark, as may be amended and/or updated by CS from time to time.

Definitions:

“**Benchmark**” means any index administered by CS which CS has determined that it may be used as a “benchmark” as defined in the EU BMR.

“**Benchmark Statement**” means the statement referred to under Article 27 of EU BMR.

“**Contributions of Input Data**” means providing any Input Data not readily available to CS, or to another person for the purposes of passing to CS, that is required in connection with the determination of a Benchmark, and is provided for that purpose.

“**Data Source**” means the publication, page (or any other origin of reference, including an exchange) containing (or reporting) the prices, levels, rates or other data utilised by CS as Input Data, and to any successor publication, page or source on which the relevant prices, levels, rates or other data may be disseminated.

“**Equity Instruments**” means shares, stocks, equity indices (whether sponsored or administered by CS, any of its affiliates, or any third party entity), mutual funds, exchange traded funds (ETFs), listed futures (including on equity volatility underlyings) linked to one or more equity underlyings, listed options linked to one or more equity underlyings, or OTC derivatives linked to one or more equity underlyings.

“**Expert Judgment**” refers to the exercise of discretion by an administrator with respect to the use of data in determining an Equities Benchmark. Expert Judgment includes extrapolating values from prior or related transactions, adjusting values for factors that might influence the quality of data, such as market events or impairment of a buyer or seller’s credit quality, or weighting firm bids or offers greater than a particular concluded transaction.

“**Index Rules**” means, in respect of any Equities Benchmark, the methodology or rule book for such Equities Benchmark.

“**Input Data**” means the data in respect of the value of one or more underlying assets, or prices, used by CS to determine an Equities Benchmark.

“**Level**” means, in relation to an Equities Benchmark, the calculated and announced value of such Equities Benchmark.

Appendix 2 – ESG factors

1. ING Socially Responsible Investments Index

The ING Socially Responsible Investments Index (the “**Index**”) is designed to pursue ESG objectives. For the purposes of Article 27(2a) of the EU BMR, as amended by the Low Carbon Benchmark Regulation, ESG factors for each of the requirements set out in Article 27(2) of the EU BMR are reflected in the Index as set out below. As at the date of publication of this Version of the Benchmark Statement (being 30 April 2020), the delegated acts supplementing Article 27(2a) of the EU BMR had not been finalised and, accordingly, the following disclosure is designed to address the disclosure requirements specified in Article 27(2a) only.

1.1. Definitions for all key terms relating to the benchmark: There are no specific ESG definitions in respect of the definitions of the key terms relating to the Index.

1.2. Rationale for adopting the benchmark methodology and procedures for the review and approval of the methodology: The rationale for adopting the relevant Index Rules is to pursue ESG objectives by enabling investors in products referencing the Index to participate in the performance of a notional portfolio of company stocks selected, by the application of the Index methodology, from a universe (the “**Universe**”) of socially responsible companies created by ING Bank N.V. (the “**Universe Creator**”) in accordance with various ESG factors. Such selection expressly excludes companies assessed for activities and/or unwanted behaviour in the following areas: alcohol, international labour issues (including child labour), corruption, fur, gambling, nuclear energy, human rights (including discrimination), environmental offences, pornography, social laws and codes, tobacco and weapons (see paragraph 1.3 below). The Universe of constituents is thereafter screened by Credit Suisse International (the “**Index Creator**”) based on corporate performance, valuation and business development in order to select the stocks within this investment theme to be included in the Index.

The procedures for review and approval of the relevant Index Rules do not reflect ESG factors.

1.3. Criteria and procedures used to determine the benchmark, including a description of the input data, the priority given to different types of input data, the minimum data needed to determine a benchmark, the use of any models or methods of extrapolation and any procedure for rebalancing the constituents of a benchmark’s index: The relevant Index Rules describe (x) the criteria that should be applied by the Universe Creator, when creating the Universe of eligible constituents comprising at least 300 stocks of socially responsible companies and (y) the criteria to be applied by the Index Creator to such Universe of eligible constituents when selecting the 50 stocks to constitute the Index.

(a) Consideration of ESG factors when creating the Universe of eligible constituents

ESG factors are reflected in the design of the Index and the key elements of the Index methodology through the eligibility criteria that should be applied by the Universe Creator when creating the Universe of socially responsible companies. The Universe Creator use a two-step approach to analyse the sustainable performance of potential companies:

- (i) first, the Universe Creator applies a negative screening process by assessing potential companies for activities and/or unwanted behaviour in any of the

following areas: alcohol, international labour issues (including child labour), corruption, fur, gambling, nuclear energy, human rights (including discrimination), environmental offences, pornography, social laws and codes, tobacco and weapons. If any of these areas can be attributed to a company, such company should not qualify as a constituent of the Universe. The areas above will be reviewed by the Universe Creator on an ongoing basis and may change over time depending on social developments, at the discretion of the Universe Creator; and

- (ii) secondly, the Universe Creator applies a positive screening process in relation to the potential constituents by using a “Non-Financial Indicator” (“**NFI**”) which assesses which companies positively distinguish themselves from their direct competitors in terms of their sustainable performance. The NFI uses approximately 100 public, social and environmental criteria to provide an objective picture of the risk and reputation profile of the companies covered. A key factor is the position and comparison of a potential company in relation to its competitors in the relevant sector. The NFI shows whether a company has formulated measurable goals, actively tries to achieve these goals and measures the results thereof. If a company receives a negative score (i.e. below sector average) in the NFI, the company should not qualify as a constituent. Accordingly, the Universe should comprise only such companies which have scores that are equal to or higher than the average score of companies in that sector, indicating that the companies included in the Universe are more socially responsible than their direct competitors.

(b) Consideration of ESG factors when selecting the eligible universe and Index constituents

Once the Universe of socially responsible companies has been determined by the Universe Creator, the Index Creator will create an “eligible universe” by selecting the 250 stocks that (i) have the highest market capitalisation and (ii) are included in the HOLT database. The Index Creator will thereafter apply the HOLT scoring model and a minimum average trading volume filter to select 50 stocks that will constitute the Index until the next Semi Annual Rebalancing Effective Date (or earlier replacement in the case of a non-compliant company or constituent replacement pursuant to the relevant Index Rules). Accordingly, although ESG factors are not considered by the Index Creator while constituting the Index, exposure will not be given to a constituent unless it is part of the Universe of socially responsible companies (which, as described above, is designed to reflect ESG factors).

The Universe Creator will regularly review and update the Universe and endeavour to maintain the quantity and quality of the Universe with respect to the criteria applied by it. This may include amending the list of areas used for negative screening of potential companies (see above). The Universe Creator will also provide an updated Universe of eligible constituents to the Index Creator in February and August of each year and depending on whether companies comply with or fail to meet the eligibility criteria (which should take into account ESG factors), they will either be added or removed, as applicable, from the Universe of eligible constituents and accordingly, cannot form part of the Index.

At inception, the Index is an equally weighted index and the relevant Index Rules provide for systematic rebalancing and reweighting of the Index at periodic intervals.

Once companies have been selected for inclusion in the Universe of socially responsible companies, ESG factors will not have any impact on the weighting of the Index constituents. The Index Creator may supplement, amend, revise or withdraw the relevant Index Rules if it determines that a change to the Index Rules (including in relation to eligibility requirements or construction and weighting considerations) is required or desirable in order to update the Index Rules or to address an error, ambiguity or omission. ESG factors should be reflected in the eligibility criteria of the Universe of socially responsible companies updated by the Universe Creator.

If the Index Creator determines that the Universe does not comprise an adequate number of companies with adequate market capitalisation or liquidity or adequate representation of sectors and regions, it may decide to terminate the Index, revise the relevant Index Rules or take any other action it deems necessary or appropriate in its sole discretion. Prior to doing so, it needs to inform the Universe Creator of its intention. Following such notification, the Index Creator and the Universe Creator will discuss in good faith such adjustments to the Universe as are necessary for it to comprise an adequate number of companies with adequate market capitalisation and liquidity and representation of sectors and regions (as determined by the Index Creator). It is possible that in the case of such adjustment of the Universe, ESG factors are not reflected. If the Index Creator and the Universe Creator fail to reach agreement within the prescribed period, the Index Creator may terminate the Index, revise the Index Rules or take any other action it deems necessary or appropriate in its sole discretion. In such case, it is possible that the methodology in the revised Index Rules or change to the Index Rules or the Index following any other discretionary action taken by the Index Creator does not reflect ESG factors.

The relevant Index Rules set out various review and compliance procedures in respect of the Index and its constituents, being (a) compliance reviews in respect of the Index constituents in May and November of each year, (b) periodic reviews of the Index in February and August of each year and (c) operational adjustments to the Index for reasons including changes to an Index constituent's eligibility. In such case, although the Index Creator or the Index calculation agent, as applicable, may be permitted to propose new constituents to constitute the Index or determine any interim constituent change, as applicable, neither entity is required to account for ESG factors in doing so. Instead, ESG factors are applicable to the role of the Universe Creator, i.e. to review the Index constituents to ensure that they still comply with the criteria for social responsibility and, where applicable, to remove any non-compliant constituents from the Index.

The Index Creator is dependent on the Universe Creator performing its review function. At each compliance review, if the Universe Creator does not provide the Index Creator with a list of non-compliant companies, there will be no change to the Index and accordingly, there may be Index constituents that do not comply with the criteria for social responsibility and therefore do not reflect ESG factors. Similarly, (a) at each periodic review, if the Index Creator does not receive a list of non-compliant companies from the Universe Creator within the prescribed period, all new Index constituents will be assumed to be compliant with the criteria for social responsibility and (b) at each interim Index constituent change, if the Universe Creator does not inform the Index Creator of whether the new constituent meets the criteria for social responsibility within the prescribed period, such new constituent will be included in

the Index. In such case, it is possible that the new Index constituents do not comply with the criteria for social responsibility and therefore do not reflect ESG factors.

Since the Index is constituted by the Index Creator from a Universe of socially responsible companies selected by a third party, i.e. the Universe Creator (as described above), any ESG data and standards are not directly embedded in the Index methodology but are reflected through the relevant eligibility criteria that should be applied by the Universe Creator when creating the Universe of constituents and therefore, there is no ESG related Input Data for the Index (other than the fact that the Input Data relates to stocks issued by companies that formed part of the Universe). The data used to create the Universe is externally sourced and is applied by the Universe Creator in accordance with its internal model and the Index Creator is not required to verify the constituents of the Universe against the Universe Creator's internal model. There is also no minimum data needed to determine the Index or method of extrapolation which reflects ESG factors.

The primary Input Data in respect of each Index constituent is the official price from the primary exchange for that constituent, which will reflect any ESG characteristics of that constituent.

In case of any changes to the eligibility criteria by the Universe Creator, the relevant Index Rules will be revised by the Index Creator to reflect such updated eligibility criteria. As such, ESG factors should continue to be reflected through the Universe of socially responsible companies.

1.4. Controls and rules that govern any exercise of judgement or discretion by the administrator or any contributors, to ensure consistency in the use of such judgement or discretion: Since the Universe of socially responsible companies is determined by a third party (i.e. the Universe Creator) and the selection of the Index constituents by the Index Creator is rules-based, ESG factors are not reflected in the controls and rules that govern any exercise of judgment or discretion by the administrator or any contributors (as the Universe Creator is neither the administrator of, or contributor to, the Index). However, ESG factors should be reflected in any discretion exercised by the Universe Creator in applying the eligibility criteria to determine the Universe from which the Index is created or reviewing its ESG screening processes. Such discretion may relate to (a) analysing which companies are not socially responsible by reference to a list of areas (see above) and therefore, should not be included in the Universe, (b) selecting an NFI that is relevant for positive screening of potential companies and (c) amending the eligibility criteria from time to time and setting parameters for such amendments.

1.5. Procedures which govern the determination of the benchmark in periods of stress or periods where transaction data sources may be insufficient, inaccurate or unreliable and the potential limitations of the benchmark in such periods: As the eligibility criteria for the Universe (which, as described above, should reflect ESG factors) employs the Universe Creator's internal methodology, any events that may lead to the parameters for its methodology being insufficient, inaccurate or unreliable as a basis for identifying socially responsible companies, or not being consistent with the assumptions made when the Universe of eligible constituents was selected as the basis for screening and selecting the Index constituents, may compromise the reliability of the Index.

There are no procedures which govern the determination of the Index in periods of stress which reflect ESG factors.

1.6. Procedures for dealing with errors in input data or in the determination of the benchmark, including when a re-determination of the benchmark is required:

There are no procedures for dealing with errors in input data or in the determination of the benchmark, including when a re-determination of the benchmark is required, that reflect ESG factors.

1.7. Identification of potential limitations of the benchmark, including its operation in illiquid or fragmented markets and the possible concentration of inputs: There are no potential limitations of the Index, including its operation in illiquid or fragmented markets and the possible concentration of inputs which reflect ESG factors.

Users and potential users of the Index should be aware that the creation of the Universe, including the development and application of the screening processes and the other criteria to create a Universe, is the responsibility of the Universe Creator and, accordingly, the Index Creator relies upon data provided by the Universe Creator. The ability of the Index to pursue ESG objectives, and to reflect ESG factors, is dependent on the methodology applied by the Universe Creator when creating or updating the Universe (including any data used and any eligibility criteria applied by the Universe Creator as part of those processes) and the data provided by the Universe Creator to the Index Creator.