



## **ICE DATA INDICES, LLC**

### **CODE OF CONDUCT FOR CONTRIBUTORS OF INPUT DATA TO THE NYSHEX FREIGHT INDICES**

February 2026



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## 1. PURPOSE AND SUMMARY

ICE Data Indices, LLC (“**IDI**”) as the administrator (the “**Administrator**”) of the NYSHEX Freight Indices (the “**Indices**” and each an “**Index**”), has established this Code of Conduct for the New York Shipping Exchange (“NYSHEX”), which is the entity that contributes input data (the “**Contributor**”) to the Indices. For purposes of this Code of Conduct, the Indices may also be referred to as “Benchmarks”.

This Code of Conduct establishes the obligations with which the Contributor must comply when contributing input data to the Administrator, in order to comply with the UK and EU versions of Regulation (EU) 2016/1011 (together the “**BMR**”) and the IOSCO Principles for Financial Benchmarks.

Where a benchmark is based on input data from Contributors, the Administrator is required to have in place a code of conduct specifying the Contributors’ responsibilities with respect to the contribution of input data. The integrity and accuracy of a benchmark depends on the quality, integrity and accuracy of the input data provided by all Contributors.

The Contributor’s adherence to this Code of Conduct is therefore crucial to ensuring the robustness of the Indices. The Contributor is required to adhere to this Code of Conduct at all times.

## 2. SCOPE

This Code of Conduct applies to the Contributor to the Indices.

If for any reason the Contributor is unable to comply with any of the obligations set out in this Code of Conduct, the Contributor must immediately notify IDI by email at [compliance-icedataindices@ice.com](mailto:compliance-icedataindices@ice.com).

For the purposes of this Code of Conduct, the Input Data used in the determination of the Indices is described in Section 5.

## 3. CONSEQUENCES OF NON-COMPLIANCE

Where the Administrator is not satisfied that the Contributor is compliant with this Code of Conduct, or where the Contributor informs the Administrator that it is unable to comply or has identified instances of failures to comply with this Code of Conduct, the Administrator may refuse to accept contributions of Input Data from the Contributor until such time that the Administrator is satisfied that the Contributor is operating in compliance with this Code of Conduct.

## 4. CHANGES TO THIS CODE OF CONDUCT

This Code of Conduct is subject to amendment from time to time by the Administrator. The Administrator will provide the Contributor with prior notice of any such changes where reasonably possible, but the Contributor accepts that there may be circumstances in which changes must be implemented immediately.

## 5. INPUT DATA

### (a) Types of Input Data

Input Data for the Indices consists of ocean freight rates produced by NYSHEX for the shipping of containerized goods under ‘spot’ or ‘short term’ rate validities, across different container equipment types and a variety of global trade lanes. These rates are determined by the Contributor based on information sourced from various market segments: carriers, Non-Vessel

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Operating Common Carriers (“NVOCCs”) and Beneficial Cargo Owners (“BCOs”). Input Data consists of the following fields, which will be delivered to the Administrator by the Contributor in accordance with this Code of Conduct (all terms used in this Section 5 that are not defined herein shall have the definitions given to them in the NYSHEX Freight Indices Methodology (the “Methodology”).

**1) Selection Data**

- **Provider Type:** Identifies the type of data provider.
- **Week:** Specifies the reporting week.
- **Trade:** Indicates the trade lane.
- **Sub-Trade:** Defines the sub-trade within the trade lane.
- **POL (Port of Origin):** Origin port for the shipment.
- **POD (Port of Destination):** Destination port for the shipment.
- **Type:** Type of container.
- **Included/Excluded:** Marks whether the data point is included in the index calculation.
- **is\_outlier\_secondary\_weighted\_wstd:** Flags outlier status based on weighted standard deviation.

**2) Calculation Data**

- **Number of Containers:** Total container count for the shipment.
- **Average Price per Container:** Computed average freight rate per container.

**3) Informational Data**

- **Unique ID:** Unique identifier for the data record.
- **Exclusion Reasons:** Explanation for exclusion from index calculation.
- **40GP Quantity:** Quantity of 40-foot general-purpose containers.
- **40HC Quantity:** Quantity of 40-foot high-cube containers.
- **secondary\_weighted\_mean\_y:** Sub-trade level weighted mean of the mean.
- **secondary\_weighted\_wstd:** Sub-Trade level weighted standard deviation.

The Contributor must include the Base Port Pairs included in each of the following “Sub-Trades” in its data submissions:

<b>Sub-Trade Lane</b>
China/Taiwan to US West Coast
Southeast Asia to US West Coast
Northeast Asia to US West Coast
China/Taiwan to US East Coast
Southeast Asia to US East Coast
Northeast Asia to US East Coast
North Europe to US East Coast

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<b>Sub-Trade Lane</b>
China/Taiwan to North Europe
Southeast Asia to North Europe
Northeast Asia to North Europe

The Contributor acknowledges that additional Sub-Trades may be incorporated in the future and agrees to comply with any such updates to the scope of required data submissions.

On an annual basis, the Contributor must carry out a review of the trade lane weightings in accordance with the methodology. In the event that there are significant changes in trading patterns during the year that require a review and update of the weightings, the Contributor must notify the Administrator of any such proposed changes.

**(b) Quality and accuracy of Input Data**

The Contributor is required to implement and maintain appropriate procedures and controls designed to ensure the integrity and accuracy of the Input Data.

The Contributor is required to have organisational arrangements designed to ensure that all relevant data is taken into account in the calculation and/or formulation of the Input Data and that any exclusion of data can be verified and justified.

The Contributor must never selectively contribute Input Data with the intent to mislead those setting or using the pricing reference or Benchmark, nor contribute with the intent to manipulate a market.

The Contributor must perform quality control procedures on the Input Data prior to submission to the Administrator in order to identify suspicious data and carry out a review of the data by a second senior staff member to check for unusual or stale data values. The Contributor will ensure that it provides all relevant Input Data to the Administrator.

The Contributor must carry out a post-submission review of the Input Data and any errors identified during that review should be reported to the Administrator.

Contributions should not be disclosed or shared internally or externally (except as part of the contributions and audit processes), to anyone who is not involved in the contribution process.

**(c) Quantity of Input Data**

The Contributor will provide to the Administrator at least one official file of Input Data, including all Selection, Calculation, and Informational Data as set out in Section 5 above (each file of Input Data, a “Submission”) for each trade lane, sub-trade lane and port pair as specified in the Methodology, in accordance with the timing requirements for provisions included in Section 5(g) below.

The Input Data must be determined by the Contributor using data from a minimum of five individual data providers for each contribution submitted each week. Moreover, the data used must be from a minimum of two different data provider types (carriers, NVOCCs or BCOs).

In the event that the Contributor provides more than one Submission to the Administrator with respect to a Submission Deadline (as defined under Section 5(h) below), the Administrator will use the Submission received closest to the applicable Submission Deadline as the official file for that Submission Deadline.

**(d) Priority of contribution of Input Data**

All Input Data submitted to the Administrator for the calculation of the Indices must be determined using prices for container freight shipments that have either gated in at the load port (in the case of Federal Maritime Commission (FMC) regulated trades) or a sailed date (in

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the case of non-FMC regulated trades) during the ISO<sup>1</sup> week prior to the Index publication week. No quoted or booked shipping rates are to be used in determining the Input Data. All landside surcharges (port fees, customs charges, inland on-carriage charges) must also be excluded from the determination of the Input Data.

The Contributor must use data from a minimum of five individual data providers for each Submission. Moreover, the data used to calculate the Input Data for a Submission must be from a minimum of two different data provider types (carriers, NVOCCs or BCOs).

Where it is not possible to provide Input Data in accordance with these requirements, the Contributor must immediately notify the Administrator by email at [iceindices@ice.com](mailto:iceindices@ice.com). The Contributor shall then comply with the Fallback Procedures included in Section 5(e) below and determine the Input Data in accordance with such Fallback Procedures.

#### **(e) Fallback Procedures for Missing/Insufficient Data**

In circumstances where required Input Data cannot be provided in accordance with Section 5(d) above and the Administrator has been notified of such event, the Contributor will apply the following waterfall process (the “Fallback Procedures”) to determine a market-appropriate value to be used as the Input Data for the applicable Submission:

##### **i. Use of equivalent transactions.**

The Contributor may reference actual transactions in related datasets (as defined in the Methodology) for the same data provider type (carriers, NVOCCs or BCOs), either: within the same Sub-Trade, for index base ports (as defined in the Methodology) but for a different equipment type, or, within the same Sub-Trade, for the same equipment type but for index non-base ports. In either case a price offset may be applied based on the average historical rate offset between base and non-base ports or equipment types on that Sub-Trade. The Contributor may reference actual transactions in related datasets for a different data provider type, for in scope port pairs in the same Sub-Trade and for the same equipment type but for a different data provider type. In this case a price offset may be applied based on the average historical rate offset between provider types on that sub-trade.

##### **ii. Mathematical modelling.**

If no equivalent transaction is available, the Contributor may use one of several mathematical models to interpolate the level of the missing value from the previous week’s value.

##### **iii. Use of the NYSHEX Governing Board.**

If after using all the above steps the Contributor is unable to generate a market accurate input(s) which can be used to replace the missing input(s), then the Contributor will seek the opinion of the NYSHEX Governing Board to assess a market level input which can be used for the Input Data and is consistent with the methodology. In such cases a minimum of one NYSHEX Governing Board member representing a carrier and one NYSHEX Governing Board member representing an NVOCC must be involved and the Input Data assessment will be based on those members’ knowledge of the market, taking into account general market conditions, historical rate trends, related markets and qualitative inputs.

##### **iv. Non-publication.**

In the event that no Input Data that corresponds to a particular Sub-Trade Lane or Trade Lane is provided to IDI, or the Contributor deems there to be no reliable way of calculating an accurate

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<sup>1</sup> [www.iso.org/iso-8601-date-and-time-format.html](http://www.iso.org/iso-8601-date-and-time-format.html)

market price for the Base Port Pairs for that Sub-Trade Lane, then the Administrator will not determine a value for the Sub-Trade Lane in question.

The overall Trade Lane Weightings for the Trade Lane of which the affected Sub-Trade Lane is a part, will be temporarily re-weighted by the Administrator to account for the fact that insufficient data is available to calculate a reliable value for such Sub-Trade.

**(f) Format of Input Data**

The Contributor is to provide Input Data to the Administrator via SFTP delivery, or in such other format as agreed between the Administrator and the Contributor from time to time in order to ensure the secure transfer of data.

The Administrator does not accept contributions of Input Data or any other communication from Contributors in respect of an Index by telephone conversation in any circumstances.

**(g) Frequency of submission of Input Data**

The Indices are published weekly at approximately 1000 US Eastern Time (ET) on each day noted as an Index Publication Day on the Index Publication Calendar.

The Index Publication Calendar sets out the dates on which Input Data shall be submitted to the Administrator by the Contributor, which shall also be the Index Publication Days. The Contributor must produce and provide to the Administrator the Index Publication Calendar 3 months before the end of each calendar year and must be a forward-looking calendar of at least 2 years (24 months).

Any changes to the Index Publication Calendar by the Contributor must be notified to the Administrator with 90 days' notice.

The Contributor must submit Input Data by 0900 US ET on each Index Publication Day.

**(h) Timing of submission of Input Data**

The Contributor must submit Input Data by 0900 US ET on each Index Publication Day of the year (the "Submission Deadline").

The Contributor is expected to ensure that consistent and timely electronic delivery of Submissions is possible without material interruption due to human or technical failure. In particular the Contributor should have:

- Controls that will help prevent system and process failures, or identify them to rectify problems promptly;
- Business continuity and disaster recovery arrangements in place for the continuity of Submissions in the event that a significant process or system becomes unavailable or is destroyed; and
- Arrangements for the recording and capture of electronic communications from any site used for disaster recovery and/or business continuity purposes.

If the Contributor fails to submit Input Data by the required time, the Administrator reserves the right to contact the Contributor promptly to request the missing Submission. Such contact will be made using the Contributor's designated contact details and will be documented for compliance purposes. This follow-up does not relieve the Contributor of its obligation to notify the Administrator in advance if it is unable to comply with Submission requirements.

In addition, the Administrator may request support from the Contributor at any time, including for clarification or to address questions regarding Submissions. The Contributor is responsible for

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ensuring that it has sufficient staffing and coverage to promptly respond to these requests, which will also be documented for compliance purposes.

**i. Procedures for adjustments to, and standardisation of, Input Data**

The Contributor may adjust or standardise the Input Data if necessary, using all available information from the sources from which it receives pricing information, including removing outliers which are classified as any rate where the delta to the average for that week is more than two standard deviations away from the average.

Any such adjustment must comply with the Input Data requirements and all standards that are set out in this Code of Conduct.

**6. USE OF DISCRETION WHEN CONTRIBUTING INPUT DATA**

**(a) Required policies**

Where the Contributor exercises discretion when contributing Input Data, the Contributor must have established policies on the use and recording of that discretion and that specify at least the following:

- i. the circumstances in which the Contributor may exercise discretion;
- ii. the persons within the Contributor that are permitted to exercise discretion;
- iii. any internal controls that govern the exercise of the Contributors' discretion in accordance with its policies;
- iv. any persons within the Contributor that may evaluate ex-post the exercise of discretion;
- v. the notification steps to the Administrator when discretion is used, which must include providing the reason for the use of discretion; and
- vi. the information, record and documentation requirements when discretion is used.

**7. REPORTING OF SUSPICIOUS INPUT DATA**

The Contributor must establish documented internal procedures that provide for its staff to detect, assess, and report any suspicious Input Data, data used to determine the Input Data, or behaviour which they may identify in the course of determining the Input Data. The Contributor shall report the suspicious data or behavior without delay to the Contributors' compliance function (if any), legal team, or senior management, the Administrator, and the regulatory authority, as may be appropriate.

The circumstances in which the Contributor must report suspicious Input Data, without delay, to the Administrator shall include, but is not limited to:

- if it appears that a member of staff of the Contributor has attempted to, or successfully has, overwritten individual Input Data points without due cause or rationale;
- where the Contributor instigates internal disciplinary proceedings or takes action against a member of staff or data provider for reasons connected to the contribution of Input Data to the Administrator; or
- where there is a suspicion that the Input Data has been manipulated or that an attempt has been made to manipulate it.

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The initial report must be followed by an electronic communication to [compliance-icedataindices@ice.com](mailto:compliance-icedataindices@ice.com). This email should be sent promptly, and in any event no less than 1 business day from any of the circumstances set out above arising, and should include the following information:

- which Input Data the suspicions relate to;
- what the suspicions are and how they arose;
- what further investigation is being undertaken;
- the steps being taken to confirm if there has been any actual manipulation of the Input Data; and
- when the Contributor will be able to confirm the correct values for the Input Data to which the suspicions relate.

Following this report, and where appropriate, the Contributor must provide the Administrator with periodic updates on any investigation carried out and must provide details of the outcome at the conclusion of the investigation, including whether there have been any disciplinary proceedings. The Contributor must respond promptly to all requests for information from the Administrator.

## **8. CONTRIBUTORS' SYSTEMS AND CONTROLS**

The contributions process, infrastructure and controls should be sufficiently resilient to support the integrity, timeliness, accuracy and reliability of submissions.

The Contributor must have in place at least the following systems and controls:

- requirements with respect to determining the Input Data independently from competitors, clients and counterparties;
- procedures for submitting Input Data to the Administrator, which must include specifying with each Submission whether the Input Data provided is transaction data and whether it conforms to the requirements of this Code of Conduct;
- pre-contribution checks and procedures:
  - (other than where the Contributor uses an automated system for the Submission of Input Data to the Administrator which complies with the monitoring and checking procedures set out below), to monitor for and identify suspicious Input Data, including effective checking processes in the form of a review of the Input Data by a second senior authorized person;
- Management oversight and sign-off procedures prior to submission of the Input Data to the Administrator;
- post-contribution checks to verify that the Input Data has been contributed in accordance with the requirements of this Code of Conduct and to identify suspicious Input Data; and
- monitoring of the transfer of Input Data to the Administrator in accordance with the applicable policies.

To the extent the Contributor uses an automated system for the contribution of Input Data to the Administrator, in which natural persons are not able to modify the contribution of Input Data, the Contributor using the automated system is required to:

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- monitor the proper functioning of the automated system on a continuous basis; and
- check the automated system following any update or change to its software, before new Input Data is contributed.

The persons authorized to monitor and check the automated systems, must have an appropriate level of expertise to perform the function.

**(a) Errors in contributed input data**

The Contributor must have in place procedures to identify, address and report errors in Input Data. This must include a robust and documented challenge process in which Input Data are either confirmed or corrected following a challenge from the Administrator. Errors should be notified by email to [iceindices@ice.com](mailto:iceindices@ice.com).

**(b) Review of systems and controls**

The Contributor must regularly review, at least annually, the systems and controls established in relation to its contribution of Input Data. The Contributor must provide to the Administrator the results of all such reviews promptly upon request.

The Contributor must, if requested by the Administrator, review together (with the Administrator) the Contributor’s performance and compliance with this Code of Conduct.

**9. CONTRIBUTORS’ POLICIES**

The Contributor must have in place and must comply with at least the following policies (in addition to those required elsewhere in this Code of Conduct) to ensure that it provides all relevant Input Data:

- an Input Data policy that includes at least a description of:
  - i. the data to be taken into account in determining the Input Data contribution; and
  - ii. the data that the Contributor may exclude from a contribution of Input Data and the reason that such data may be excluded;
- a policy on the transmission of Input Data to the Administrator that includes at least:
  - i. a method to be used for the secure transfer of Input Data, which reflects the method of transfer agreed with the Administrator from time to time; and
  - ii. contingency plans for submitting Input Data in the event of the following:
    - a) technical and operational difficulties;
    - b) the temporary absence of a Submitter; and
    - c) the unavailability of the Input Data required by the Methodology.

**10. CONFLICTS OF INTEREST**

The Contributor must have established systems and controls concerning the identification and management of conflicts of interest that include at least:

- a conflicts of interest policy that addresses:
  - the process for identifying and managing conflicts of interest, including any internal escalation of conflicts of interest;

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- steps to prevent, or minimize the risk of, conflicts of interest in the recruitment process for Submitters;
  - steps to prevent, or minimize the risk of, conflicts of interest in the remuneration policies of the Contributors' staff;
  - steps to prevent, or minimize the risk of, conflicts of interest or the potential conflicts of interest arising from the Contributors' organisational or management structure;
  - requirements with respect to communications between the Submitters and other staff within the Contributor;
  - any physical and operational separation between Submitters and other staff of the Contributor required to prevent, or minimize the risk of, conflicts of interest;
  - rules and measures to address any financial exposure that the Contributor may have to a financial instrument or contract which references the benchmark to which the Contributor contributes Input Data.
  - potential conflicts of interest arising from Contributor staff's engagement in certain outside activities and trading.
- a register of conflicts of interest, that shall be required to be kept up to date and used to record any conflicts of interest identified and any measures taken to manage them. The register shall be accessible by internal or external auditors, the Administrator and relevant regulatory authorities (which include any regulatory authorities which authorise, oversee, register, recognise and / or regulate IDI).

The Contributor must ensure that all staff involved in the contribution process are trained in relation to all policies, procedures and controls relating to the identification, prevention or management of conflicts of interest.

## **11. SUBMITTERS OF INPUT DATA**

A person can submit the Input Data to the Administrator on behalf of the Contributor (a "Submitter") only when the Contributor is satisfied that the person has the necessary skills, knowledge, training and experience for the role. The Administrator requires that the Contributor carries out at least the level of due diligence set out in this Code of Conduct in relation to its potential Submitters.

### **(a) Due diligence to be undertaken in relation to potential Submitters**

The Contributor must, before being satisfied that a person has the necessary skills, knowledge, training and experience to be a Submitter, carry out due diligence on that person, which may include performing relevant background checks, education and employment verifications, to verify:

- the identity of the potential Submitter;
- the qualifications of the potential Submitter; and
- the reputation of the potential Submitter, including whether the potential Submitter has previously been excluded from submitting Input Data to a benchmark for reasons of misconduct.

The Contributor must notify the Administrator of the identity and contact details of any individual authorised to act as a Submitter on its behalf by sending an email to [compliance-icedataindices@ice.com](mailto:compliance-icedataindices@ice.com) prior to that individual submitting the Input Data for the first time. If this

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process is not followed, the Administrator will be unable to accept any Input Data provided and will treat it as not having been received.

The Contributor must also appoint a senior member of staff who is qualified and competent to be the person primarily responsible for signing-off on and overseeing the submission of Input Data to the Administrator.

The Contributor must have clear arrangements in place to cover absences of those determining and overseeing contributions, and should provide the Administrator with the identity and contact details of those alternates.

### **(b) Training arrangements**

The Contributor must train all staff involved in the processing, analysing, monitoring, overseeing or submission of the Input Data, at a minimum on:

- i. This Contributor Code of Conduct;
- ii. The Benchmarks Regulation (BMR); and the importance of conducting all business related to submissions with the Administrator on recorded telephone and electronic communication systems
- iii. All policies, procedures and controls relating to the identification, prevention or management of conflicts of interest.
- iv. The Market Abuse Regulation and the impropriety of attempting to influence the determination of the Contribution, and the need to report any such attempts that they become aware of; and
- v. Internal policies and procedures, systems and controls related to the contribution of Input Data.

Training should be refreshed at least annually and whenever there are material changes to this Code of Conduct or applicable regulatory requirements.

Completion of training should be recorded and retained for each individual.

All staff involved in the submission of Input Data must receive a copy of this code, and have their competency checked by the Contributor annually, with records retained of such competency checks and the outcomes.

### **(c) Whistleblowing**

The Contributor must maintain appropriate whistleblowing policies and procedures, which must include:

- i. a mechanism for issues or concerns relating to violations of the Contributor's policies and procedures as they relate to the provision of data to the Administrator, to be raised anonymously (where possible),
- ii. the prompt investigation of the whistleblowing issues, and
- iii. appropriate reporting to the Contributor's governing body.

## **12. COMPLAINTS**

The Contributor must promptly notify the Administrator of all complaints it receives directly from users regarding the Indices, including (without limitation) data collection, contributions of Input Data and quality of Input Data, by sending an email to [compliance-icedataindices@ice.com](mailto:compliance-icedataindices@ice.com).

The Contributor must provide any information or data reasonably required by the Administrator in order for the Administrator to investigate any complaints, received either by the Contributor or the Administrator, in a timely and fair manner and the Contributor shall respond promptly to any such requests for information and co-operate fully with all investigations conducted by the

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Administrator in relation to such complaints so that the outcome of the investigation can be communicated to the complainant within a reasonable period of time.

Where the Contributor has received a complaint in relation to its own data collection processes and the Contributor also conducts its own investigation in relation to such complaints, the Contributor shall provide regular updates and any relevant information to the Administrator in relation to the progress and outcome of any such complaint and respond promptly to any requests for information from the Administrator.

### **13. RECORD-KEEPING**

The Contributor must establish a record keeping policy which provides that the Contributor will keep a record of all relevant information necessary to check the Contributors' compliance with this Code of Conduct, including a record of at least the following information:

- policies and procedures governing the contribution of Input Data and any material changes to those policies and procedures;
- the register of conflicts of interest as required under Section 11 above;
- any actions (disciplinary or otherwise) taken against any of the Contributors' staff or data providers in respect of benchmark-related activities;
- a list of Submitters and persons performing checks in respect to Input Data contributions, including their names and roles within the Contributor, and the dates when the Contributor-related roles were authorised and exited; and
- in respect of each contribution of Input Data:
  - the Input Data contributed;
  - the data taken into account in determining the Input Data contribution, and any data that was excluded;
  - any use of discretion;
  - any Input Data checks undertaken by the Contributor; and
  - communications in relation to the contribution of Input Data between the Submitter and any persons within the Contributor performing checks in respect of contributions.
- any interaction with the Administrator, including telephone conversations or electronic communications between any person employed by the Administrator and the Contributor in respect of an Index;
- any queries received regarding Input Data provided to the Administrator;
- declaration of any conflicts of interests and aggregate exposures to Index related instruments;
- findings of external/internal audits, when available, related to Input Data contribution remedial actions and progress in implementing them;
- details of any complaints referred to the Administrator in accordance with the Code of Conduct and relevant information or data relating to such complaints.

These records must be kept for a minimum of five years, or three years where the records are of telephone conversations or electronic communications, on a medium that allows the storage of information to be accessible for future reference.

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## **14. COMPLIANCE WITH THIS CODE OF CONDUCT**

### **(a) Compliance**

The Contributor must have appropriate oversight of the contribution process by the compliance (or equivalent) function of the Contributor, to ensure compliance with the Contributor's obligations under this Code of Conduct and the Contributor's internal policies and procedures. The Contributor must report any findings from monitoring or compliance activities to management and the Administrator (as appropriate) on a periodic basis as agreed with the Administrator.

### **(b) Annual Attestation**

The Contributor is required to annually attest to the Administrator that they comply with this Code of Conduct. Where the Contributor is unable to give this attestation, it instead must explain why it is unable to do so, setting out in detail which areas of the Code of Conduct the Contributor is in compliance with and which it is not in compliance with.

Following the first attestation of compliance with the Code, the attestation is required to be given annually on the anniversary of the first attestation and should be provided by email to [compliance-icedataindices@ice.com](mailto:compliance-icedataindices@ice.com).

### **(c) Notice to Cease**

If the Contributor wishes to cease contributions, no less than 90 calendar days written notice must be provided to the Administrator.

### **(d) Contact Information**

Questions concerning this Code of Conduct should be directed by email to [compliance-icedataindices@ice.com](mailto:compliance-icedataindices@ice.com).