Index Rules & Methodology | March 18, 2022

## Update on treatment of Russian & Belarusian Securities for ICE Fixed Income Indices

Aram Flores, Head of Indices & Analytics ICE Data Services | ICE Data Indices

Preston Peacock, Senior Director ICE Data Services | ICE Data Indices ICE Index Hotline: New York: +770 999 4501 London: +44 203 948 6501 Email: *ICEIndices @ice.com* 

## ICE Data Indices treatment of Russian and Belarusian securities in ICE fixed income indices

Further to the notice entitled "ICE Fixed Income Index Treatment of Sanctioned Russian Entities", dated February 28 and in accordance with the consultation entitled "Russia-Related Sanctions Consultation", dated March 3, 2022, in which ICE Data Indices ("IDI") gathered feedback from multiple stakeholders on a number of questions regarding the treatment of Russian debt, IDI announced the following changes to ICE fixed income indices:

- From February 28, 2022 rebalancing, entities covered under the United States (OFAC)<sup>1</sup>, United Kingdom<sup>2</sup> or European Union<sup>3</sup> sanctions on new issuance will not be added to any ICE fixed income indices. Covered under these sanctions is any new sovereign debt issued by the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation.
- 2. All debt with Russia as its country of risk will be excluded from all indices beginning with the March 31, 2022 rebalancing. In the interim the securities will be treated as follows:
  - a. All local currency RUB-denominated Russian securities were marked at zero, without cash and accrued interest beginning March 9, 2022. IDI's pricing provider, ICE Data Pricing and Reference Data, LLC ("PRD") discontinued evaluations for all ruble-

May not be reproduced by any means without express permission. All rights reserved. Please see important disclaimers at the end of this document.

<sup>&</sup>lt;sup>1</sup> https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/ukraine-russia-related-sanctions https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/russian-harmful-foreign-activities-sanctions

https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/belarus-sanctions/sanctions/sanctions-programs-and-country-information/belarus-sanctions/sa

<sup>&</sup>lt;sup>2</sup> https://www.gov.uk/government/publications/financial-sanctions-ukraine-sovereignty-and-territorial-integrity

<sup>&</sup>lt;sup>3</sup> https://www.gov.uk/government/publications/financial-sanctions-ukraine-sovereignty-and-territorial-integrity

denominated securities after March 8, 2022.

b. Foreign currency Russian securities will continue to use evaluated prices for as long as our pricing provider, PRD, can continue to evaluate them. If evaluations become unavailable the securities will be marked at zero. Any cash or accrued interest will be removed from all foreign currency Russian securities beginning March 9, 2022.

Further to Point 2b above IDI will remove foreign currency Russian securities at zero on March 31, 2022. In addition, IDI will remove all Belarusian securities on March 31, 2022 at zero.

For the avoidance of doubt, the foreign currency Russian securities and Belarusian securities marked at zero by IDI may still be evaluated by PRD on March 31, 2022.

The zero mark used by IDI to affect the removal of securities from the indices as described in Point 2 above, is not intended to reflect the value of the security and is not a PRD evaluation. The PRD evaluated price, as available, may be different than zero. Please contact your customer support representative for more information.

Any re-introduction of Russian or Belarusian debt into the indices will be subject to applicable laws and regulations and subject to future consultation.

These changes are being made in accordance with the letter and spirit of the sanctions, as well as the rules and regulations that govern our business.

We continue to speak with customers and other stakeholders and will provide any additional updates as needed. Please contact the index team if you have any questions - contact details above.

## **Disclosures**

Source: ICE Data Indices, LLC.

This document is not to be published, reproduced, copied, disclosed or used without the express written consent of Intercontinental Exchange, Inc. ("ICE"). This document is provided for informational purposes only. The information contained herein is subject to change without notice and does not constitute any form of warranty, representation, or undertaking. Nothing herein should in any way be deemed to alter the legal rights and obligations contained in agreements between ICE, ICE Data Indices, LLC ("IDI") and/or any of their affiliates and their respective clients relating to any of the products or services described herein. This document may include observations made by IDI of general market movements and trends, but nothing herein is intended to be a solicitation or a recommendation to buy, sell or hold securities. IDI does not provide legal, tax, accounting, investment or other professional advice. Clients should consult with an attorney, tax, or accounting professional regarding any specific legal, tax, or accounting situation. Each index provides a general investment strategy, does not take into account any of the specific needs or financial circumstances of any person, entity or group of persons and should not be considered investment advice. All information provided by IDI, including without limitation, any materials that describe any Index, is of general nature only.

Unless otherwise indicated, these materials have been prepared solely for informational purposes based upon information generally available to the public from source(s) believed to be reliable and are subject to change without notice. No content contained in this document (including index data, ratings, credit-related analyses and data, model, software or other application or output therefrom) or any part thereof ("Content") may be modified, reverse-engineered, reproduced or distributed in any form by any means, or stored in a database or retrieval system, without the prior written permission of IDI. The Content shall not be used for any unlawful or unauthorized purposes. ICE, IDI and their affiliates and their third-party data providers and licensors (collectively "ICE Indices Parties") do not guarantee that the Content is accurate, complete, timely or error free and it should not be relied upon as such. ICE Indices Parties are not responsible for any errors, omissions, or interruptions regardless of the cause, or for the results obtained from the use of the Content, and in no event shall the ICE Indices Parties have any liability (whether in negligence or otherwise) to any person in connection with such person's unauthorized use of any Index or Content. THE CONTENT IS PROVIDED ON AN "AS IS" BASIS. ICE INDICES PARTIES DISCLAIM ANY AND ALL EXPRESS OR IMPLIED WARRANTIES AND CONDITIONS, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER MATTER. Without limiting the foregoing, the ICE Indices Parties make no representation or warranty that any data or information (including but not limited to evaluated pricing) supplied to or by it are complete or free from errors, omissions, or defects. In no event shall the ICE Indices Parties be liable to any party for any direct, indirect, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs) in connection with any use of the Content even if advised of the possibility of such damages.

Any available index returns are hypothetical and do not represent the results of actual trading of Investable Products, and as such, do not represent actual past performance and are not indicative of any specific investment. The Content (including any of the output derived from any analytic tools or models) is not intended to predict actual results, which may differ substantially from those reflected. Past performance is not necessarily indicative of future results.

Historical returns and weights before the launch date of an Index are based upon backtested data. For the period prior to the launch date of an Index, simulated performance data has been provided as an illustration of how the Index would have performed during the relevant period had the Index been calculated by IDI using the current Index methodology. Such simulated performance data has inherent limitations, as the simulated data is produced by the retroactive application of the methodology. Simulated performance data is based on criteria applied retroactively with the benefit of hindsight and knowledge of factors that may have positively affected its performance and may reflect a bias toward strategies that have performed well in the past.

The IDI Governance Committee reserves the right to treat individual indices differently in accordance with the stated objectives in the relevant index methodologies. In addition, IDI reserves the right to re-evaluate and modify the removal price of any security, subject to market accessibility and availability of pricing. Please note that users of IDI's indices are solely responsible for ensuring such users' compliance with all applicable law (including, without limitation, sanctions laws and any other rules, regulations or prohibitions) in connection with such use (including, without limitation, trading, investment or other use).

ICE, the ultimate parent company of IDI, keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of ICE may have information that is not available to other business units. IDI has established policies and procedures to maintain the confidentiality of certain non-public information received in connection with each analytical process. There is no obligation on IDI to disclose information held by it in relation to any Index to other parties.

The various businesses of ICE provide a wide range of products and services to a diverse group of clients and, as such, ICE faces potential conflicts of interest in the ordinary course of its business. ICE may be acting in a number of capacities in connection with Investable Products

or other transactions entered into in relation to IDI. ICE, acting in such capacities in connection with such transactions, shall have only the duties and responsibilities expressly agreed to by it in its relevant capacity and shall not, by virtue of its acting in any other capacity, be deemed to have other duties or responsibilities or be deemed to hold a standard of care other than as expressly provided with respect to each such capacity. IDI has established policies and procedures designed to identify and address conflicts of interest.

In addition, ICE provides a wide range of services to, or relating to, many organizations, including issuers of securities, investment advisers, broker-dealers, investment banks, other financial institutions and financial intermediaries, and accordingly may receive fees or other economic benefits from those organizations, including organizations whose securities may form part of any index or other evaluation IDI carries out.

ABOUT INTERCONTINENTAL EXCHANGE: Intercontinental Exchange, Inc. (NYSE: ICE) is a Fortune 500 company and provider of marketplace infrastructure, data services and technology solutions to a broad range of customers including financial institutions, corporations and government entities. We operate regulated marketplaces, including the New York Stock Exchange, for the listing, trading and clearing of a broad array of derivatives contracts and financial securities across major asset classes. Our comprehensive data services offering supports the trading, investment, risk management and connectivity needs of customers around the world and across asset classes. As a leading technology provider for the U.S. residential mortgage industry, ICE Mortgage Technology provides the technology and infrastructure to transform and digitize U.S. residential mortgages, from application and loan origination through to final settlement.

ABOUT ICE DATA SERVICES: ICE Data Services refers to a group of products and services offered by certain Intercontinental Exchange, Inc. (NYSE:ICE) companies and is the marketing name used for ICE Data Services, Inc. and its subsidiaries globally, including ICE Data Indices, LLC, ICE Data Pricing & Reference Data, LLC, ICE Data Services Europe Limited and ICE Data Services Australia Pty Ltd. ICE Data Services is also the marketing name used for ICE Data Derivatives, Inc., ICE Data Analytics, LLC certain other data products and services offered by other affiliates of Intercontinental Exchange, Inc.

Fixed income evaluations, continuous evaluated pricing, end-of-day evaluations, evaluated curves, model-based curves and Fair Value Information Services related to securities are provided in the US through ICE Data Pricing & Reference Data, LLC and internationally through ICE Data Services entities in Europe and Asia Pacific. ICE Data Pricing & Reference Data, LLC is a registered investment adviser with the US Securities and Exchange Commission. Additional information about ICE Data Pricing & Reference Data, LLC is available on the SEC's website at www.adviserinfo.sec.gov. A copy of ICE Data Pricing & Reference Data, LLC's Form ADV is available upon request.

Trademarks of ICE and/or its affiliates include: Intercontinental Exchange, ICE, ICE block design, NYSE, ICE Data Services, New York Stock Exchange, Intellidex, StrataQuant and Interactive Data. Information regarding additional trademarks and intellectual property rights of ICE and/or its affiliates is located at www.intercontinentalexchange.com/terms-of-use. BofA® is a registered trademark of Bank of America Corporation licensed by Bank of America Corporation and its affiliates ("BofA") and may not be used without BofA's prior written approval. Other products, services or company names mentioned herein are the property of, and may be the service mark or trademark of, their respective owners.