



ICE Data Indices, LLC Benchmark Statement

ICE® FX Index Family

November 2023

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ICE Data Indices Benchmark Statement

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Name of the benchmark administrator	ICE Data Indices, LLC ("IDI")

1. Introduction

ICE Data Indices, LLC ("IDI") is a U.S. subsidiary of Intercontinental Exchange, Inc. ("ICE"), and is the administrator for the indices in the ICE FX Index family. The full list of indices in the ICE FX Index Family (each, an "Index" and collectively the "Indices") is available on the ICE Index Platform <https://indices.ice.com/> under Index Finder -> Equity filtering on the "Benchmark Statement Family" column for "ICE FX Index Family".

A link to IDI Benchmark Statements is available on the Index Platform and can also be found here: <https://www.ice.com/fixed-income-data-services/index-solutions/regulation/benchmark-statements> where users can view the list of Index Families and their corresponding Benchmark Statements.

Individual rule and methodology documents ("Index Rules") are available on the ICE Index Platform by entering the applicable Index ticker into the Index Snapshot.

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This benchmark statement has been created in accordance with Article 27 of the European Benchmark Regulation (“the EU BMR”)¹ which was translated into UK law under the Benchmarks (Amendment and Transitional Provision) (EU Exit) Regulations 2019 (“the UK BMR”)¹, and with reference to the supplementary delegated regulation (EU) 2018/1643² (“RTS 2018/1643”) and delegated regulation (EU) 2020/1816³ (“DA 2020/1816”), and (EU) 2020/1818⁵ (“DA 2020/1818”), on the content of benchmark statements.

References in this document to EU Regulations or Directives (including EU BMR and applicable Commission Delegated Regulation) include, in relation to the UK, those Regulations or Directives as they form part of UK domestic law by virtue of the European Union (Withdrawal) Act 2018 or have been implemented in UK domestic law, as appropriate.

IDI, has been recognized in the UK as a third country Benchmark Administrator for purposes of Article 32 of the UK BMR with the FCA as the relevant competent authority.

The benchmarks that are available for use by supervised entities in the United Kingdom are published on the FCA register https://register.fca.org.uk/s/resources#Other_registers, under Third Country Benchmarks Register.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R1011&from=EN>

¹ <https://www.legislation.gov.uk/ukxi/2019/657/contents/made>

² COMMISSION DELEGATED REGULATION (EU) 2018/1643 of 13 July 2018 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2018:274:FULL&from=EN>

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R1816>

⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R1818>

2. Benchmark Statement

	Relevant BMR, Regulatory Technical Standard (“RTS”) or Delegated Act (“DA”) provision	Requirement	IDI’s Response
1	ISIN	RTS 2018/1643 Art(1)(1)(b): The benchmark statement shall state: (b) where available, the international securities identification number (ISIN) of the benchmark or benchmarks; alternatively, for a family of benchmarks, the statement may provide details of where the ISINs are publicly accessible free of charge;	ISINs are not currently assigned to the benchmarks.
2	Contributions of Input Data	RTS 2018/1643 Art(1)(1)(c): The benchmark statement shall state: (c) whether the benchmark, or any benchmark in the family of benchmarks, is determined using contributions of input data;	The ICE FX Index Family does not use contributions of input data
3	Types of Benchmarks	RTS 2018/1643 Art(1)(1)(d): The benchmark statement shall state: (d) whether the benchmark or any benchmark in the family of benchmarks qualifies as one of the types of	The indices in the ICE FX Index Family do not qualify as regulated data, interest rate or commodity benchmarks, or as Climate Transition Benchmarks or Paris-Aligned

		benchmarks listed under Title III of Regulation (EU) 2016/1011, including the specific provision by virtue of which the benchmark qualifies as that type.	Benchmarks. ⁶ The ICE FX Index Family contains only non-significant benchmarks as defined under point (27) of Article 3(1) of the BMR. ⁷
4	Economic Reality	<p>RTS 2018/1643 Art(1)(2):</p> <p>In defining the market or economic reality, the benchmark statement shall include at least the following information:</p> <p>(a) a general description of the market or economic reality;</p> <p>(b) the geographical boundaries, if any, of the market or economic reality;</p> <p>(c)⁸ any other information that the administrator reasonably considers to be relevant or useful to help users or potential users of the benchmark to understand the relevant features of the market or economic reality, including at least the following elements insofar as reliable data on these elements is available:</p> <p>(i) information on actual or potential participants in the market;</p>	<p>The market or economic reality, the geographical boundaries, that an individual benchmark intends to represent is clearly described in the Index Rules.</p> <p>The circumstances under which market conditions might impair the ability of the benchmark to measure a given market are described in the Limitations section of the Index Rules.</p>

⁶ The benchmark statement does not therefore need to disclose the information required by RTS 2018/1643 Articles 2 to 5.

⁷ As a result, RTS 2018/1643 Article 1(7) provides that the benchmark statement does not need to disclose the information required by Article 1(2)(c), Article 1(3)(b) and (c), and Article 1(4) and (5).

⁸ Not applicable - the ICE FX Index Family consists of non-significant benchmarks only.

		<p>(ii)an indication of the size of the market or economic reality.</p> <p>BMR Art27(1)(a):</p> <p>The benchmark statement shall:</p> <p>(a) clearly and unambiguously define the market or economic reality measured by the benchmark and the circumstances in which such measurement may become unreliable;</p>	
5	Limitations	<p>BMR Art27(2)(g):</p> <p>A benchmark statement shall contain at least:</p> <p>(g) the identification of potential limitations of the benchmark, including its operation in illiquid or fragmented markets and the possible concentration of inputs.</p> <p>RTS 2018/1643 Art(1)(3)(a):</p> <p>In defining the potential limitations of the benchmark and the circumstances in which the measurement of the market or economic reality may become unreliable, the benchmark statement shall include at least: (a) a description of the circumstances in which the administrator would lack sufficient input data to</p>	<p>By design, the benchmarks are focused on representing the value of specific currencies against various other currencies of key trading partners. As the underlying markets transform due to economic and geopolitical changes, the methodology of the benchmark may adjust and be updated accordingly.</p> <p>IDI seeks to manage and mitigate these limitations through the Benchmark design, review and oversight process.</p>

		determine the benchmark in accordance with the methodology;	
6	Discretion	<p>BMR Art27(1)(b):</p> <p>The benchmark statement shall: (b) lay down technical specifications that clearly and unambiguously identify the elements of the calculation of the benchmark in relation to which discretion may be exercised, the criteria applicable to the exercise of such discretion and the position of the persons that can exercise discretion, and how such discretion may be subsequently evaluated;</p>	<p>The Index Rules clearly set out how the Indices are to be calculated.</p> <p>While IDI mostly relies on input data obtained from its sources, on certain occasions, where decisions relating to the pricing of a Benchmark are required to maintain the integrity of the values and ensure that the Benchmark continues to operate in line with the methodology, IDI may apply Expert Judgment.</p> <p>Where it is required in a Benchmark determination, it may only be applied by suitably experienced and qualified staff members on the IDI team in accordance with the Methodology document. Using their expertise and knowledge, and the information available to them, they will make an assessment of what adjustment would be most appropriate to correctly reflect the Benchmark objective.</p> <p>Ultimately, any exercise of Expert Judgment is overseen by the Governance Committee of IDI, which ensures that the published Methodologies have been followed.</p>
7	Factors beyond the control of the administrator	<p>BMR Art27(1)(c):</p> <p>The benchmark statement shall: (c) provide notice of the possibility that</p>	<p>From time to time, events outside of the control of IDI may occur that may require changes to, or cessation of benchmarks in the ICE FX Index Family.</p>

		factors, including external factors beyond the control of the administrator, may necessitate changes to, or the cessation of, the benchmark; and	<p>IDI has implemented a Benchmark Cessation Procedure, which is published on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation) and which set out the steps IDI would take if termination of a benchmark was being considered.</p> <p>IDI has also published a Consultation Policy which is available on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation) and which sets out the steps IDI would take if a material change was needed in relation to a benchmark in the ICE FX Index Family.</p>
8	Impact of changes or cessation	<p>BMR Art27(1)(d):</p> <p>The benchmark statement shall: (d) advise users that changes to, or the cessation of, the benchmark may have an impact upon the financial contracts and financial instruments that reference the benchmark or the measurement of the performance of investment funds.</p>	<p>Changes to, or cessation of a benchmark may have an impact upon the financial contracts and financial instruments that reference the benchmark or the measurement of the performance of investment funds. Where changes to a benchmark are subject to a consultation, users are encouraged to provide feedback on the proposed change and the impact it may have.</p> <p>Any users of benchmarks that are to be discontinued are advised to take account of the upcoming cessation and ensure their contractual and other arrangements linked to the benchmarks contain appropriate fallback or other arrangements to address the cessation.</p> <p>IDI has published a Consultation Policy which is available on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation) and which sets out the</p>

			steps IDI would take if a material change was needed in relation to a benchmark in the ICE FX Index family.
9	Key Terms	<p>BMR Art27(2)(a):</p> <p>A benchmark statement shall contain at least:</p> <p>(a) the definitions for all key terms relating to the benchmark</p>	All key terms relevant to the ICE FX Index Family are set out in the Index Rules.
10	Rational for adoption and procedures for review and approval	<p>BMR Art27(2)(b):</p> <p>A benchmark statement shall contain at least:</p> <p>(b) the rationale for adopting the benchmark methodology and procedures for the review and approval of the methodology;</p>	<p>The Index Rules for each of the benchmarks within the ICE FX Index family set out what the benchmarks intend to cover and achieve.</p> <p>The IDI Governance Committee is responsible for overseeing the development, design, issuance and operation of the Indices and the respective methodology documents. The IDI Governance Committee Charter is available on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation).</p> <p>IDI has also published a Consultation Policy which is available on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation) and which sets out the steps IDI would take if a material change was needed in relation to a benchmark in the ICE FX Index family.</p>

11	Criteria used to determine the benchmark	<p>BMR Art27(2)(c)</p> <p>A benchmark statement shall contain at least:</p> <p>(c) the 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;</p>	<p>The spot currency rates which are used for the intraday real-time and closing index calculations in the ICE FX Indices are sourced from ICE Data Derivatives, an affiliated company of IDI, which obtains this data from a number of brokers and bank sources.</p> <p>No priority is given to certain data types in the calculation of the ICE FX Indexes.</p> <p>The general procedures for determining the benchmarks in the ICE FX Index Family are set out in the Index Rules.</p>
12	Exercise of Judgement or Discretion	<p>BMR Art27(2)(d)</p> <p>A benchmark statement shall contain at least:</p> <p>(d) the 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;</p>	<p>Where exercise of judgment or discretion is required in a Benchmark determination, it may only be applied by suitably experienced and qualified staff members on the IDI team in accordance with the Methodology document. Using their expertise and knowledge, and the information available to them, they will make an assessment of what adjustment would be most appropriate to correctly reflect the Benchmark objective.</p> <p>Ultimately any exercise of Expert Judgment is overseen by the Governance Committee of IDI, which ensures that the published Methodologies have been followed.</p>
13	Periods of Stress	<p>BMR Art27(2)(e)</p> <p>A benchmark statement shall contain at least:</p> <p>(e) the procedures which govern the determination of the benchmark in periods of stress or periods where</p>	<p>Actions taken by IDI for the ICE FX Index Family in exceptional market conditions are outlined in the Index Rules. IDI retains the right to delay the publication of the benchmark level or suspend the publication of the level of the benchmark if it believes that circumstances prevent the proper calculation of the benchmark. In the event that there is a market-wide event resulting in the complete or partial</p>

		transaction data sources may be insufficient, inaccurate or unreliable and the potential limitations of the benchmark in such periods;	unavailability of data required for the Index calculation, IDI will determine its approach on a case-by-case basis, and communicate the action taken to stakeholders.
14	Errors	<p>BMR Art27(2)(f)</p> <p>A benchmark statement shall contain at least:</p> <p>(f) the procedures for dealing with errors in input data or in the determination of the benchmark, including when a redetermination of the benchmark is required;</p>	<p>Reasonable efforts are made to ensure the correctness and validity of data used in benchmark calculations.</p> <p>Where errors have occurred in the determination or calculation of a benchmark, the decision to make a restatement will be assessed on a case-by-case basis. Such decision will take account of the significance; impact; age; and scale of the error.</p> <p>All revisions or issues with the publication of the benchmarks will be communicated to stakeholders during the day through the regular communication channels; in addition, IDI may also contact clients directly; post a notice on the ICE Index Platform https://indices.ice.com/; send an email announcement, or use other such forms of communication.</p>
Specific disclosure requirements on ESG Factors and how they are reflected in each benchmark or family of benchmarks			
15	ESG Factors	<p>BMR Art 27(2a)</p> <p>DA 2020/1816</p> <p>Specific disclosure requirements on ESG Factors and how they are reflected in the benchmark statement and the benchmark methodology.</p>	The ICE FX Index Family does not take ESG factors into account in the benchmark design and does not pursue ESG objectives.

Specific disclosure requirement on the alignment with the objectives of the Paris Agreement			
16	Alignment with Paris Agreement	<p>DA 2020/1816</p> <p>Does the benchmark (or family of benchmarks) align with the target of reducing carbon emissions or the attainment of the objectives of the Paris Agreement.</p>	No
17	Temperature Scenario	<p>DA 2020/1816</p> <p>The temperature scenario, in accordance with international standards, used for the alignment with the target of reducing GHG emissions or attaining of the objectives of the Paris Agreement;</p> <p>The name of the provider of the temperature scenario used for the alignment with the target of reducing GHG emissions or the attainment of the objectives of the Paris Agreement;</p>	N/A

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