

Third Party Release Letter

Independent practitioner's assurance report to the directors of ICE Benchmark Administration Limited (the 'Company') in respect of the ICE Commodities Traceability ('ICE CoT') platform to support users with their due diligence and other obligations under EU Deforestation Regulation (Regulation (EU) 2023/1115, as amended by the Regulation 2024/3234, together 'EUDR') as at 22 January 2026.

Ernst & Young LLP ('we' or 'EY') have been requested by the Company to provide you, the recipient company, firm, or organisation (the 'Recipient'), with a copy of the report we prepared, on the Company's instructions, on the Company's control procedures that relate to the ICE CoT Platform in supporting its users with their due diligence and other obligations under EUDR as at a point in time ('the Report').

The Report was prepared solely for the use of the Company and addressed issues specific to them. Accordingly, we may not have addressed issues of relevance to you (together the 'Recipients'). Further, the Report was concluded on **2 March 2026**, and we have not undertaken any further work since that time.

Material events may therefore have occurred which will not be reflected in the Report.

Whilst we are prepared to provide a copy of the Report to the Recipients, it is only on the basis that the Recipients acknowledge and agree that:

1. EY gives no assurance that use of the ICE CoT Platform or any outputs from it will ensure compliance with EUDR or identify specific areas of non-compliance;
2. EY's opinion does not include a review of the quality of the data uploaded by users to the ICE CoT Platform;
3. the Recipient read and understood the methodology published by ICE CoT at [ICE CoT](#). More specifically, that the ICE CoT platform and all related data and information is provided 'as is' and ICE Benchmark Administration Limited (IBA) gives no warranty and makes no representation as to fitness for purpose, satisfactory quality or timeliness of that data or information. In particular, IBA gives no warranty and makes no representation as to the compliance of any commodities, products or related data or information with the EUDR;
4. no EY Person accepts any responsibility nor shall have any liability in contract, tort or otherwise to any Recipient or any other third party in relation to the contents of the Report;
5. any use a Recipient makes of the Report is entirely at its own risk;
6. no Recipient shall disclose all or any part of the Report to any other person, by any means, or refer to EY or any EY Person in connection with the Report;
7. to the fullest extent permitted by applicable law and professional regulations the Recipient shall indemnify the EY Persons against all claims by third parties and resulting liabilities, losses, damages, costs and expenses (including reasonable external and internal legal costs) arising out of a third party's use of or reliance on the Report disclosed to it by or through a Recipient or at a Recipient's request; and
8. EY Persons shall be entitled to enforce these terms and conditions in accordance with the Contracts (Rights of Third Parties) Act 1999.

This agreement and any dispute or claim (including non-contractual disputes or claims) arising out of or in connection with it or its subject matter or formation shall be governed by and construed in accordance with the law of England and Wales.

Each party irrevocably agrees that the courts of England and Wales shall have exclusive jurisdiction to settle any dispute or claim (including non-contractual disputes or claims) arising out of or in connection with this agreement or its subject matter or formation.

For the purposes of this agreement "EY Persons" shall mean Ernst & Young LLP, any other member of the global network of Ernst & Young firms and any of their respective subcontractors, members, shareholders, directors, officers, partners, principals or employees (including but not limited to employees of Ernst & Young Services Limited). "EY Person" shall be construed accordingly.

If you have received this document and you have not confirmed your agreement to EY's Third Party Release Letter with disclaimer in the terms of access by clicking the "I AGREE" button upon opening this document, you are an unauthorised recipient and should return or destroy the document. The EY Third Party Release Letter is an agreement which is legally binding on, and enforceable against, the Recipient, notwithstanding that the agreement is written and accepted electronically.

Executive Summary

ICE BENCHMARK ADMINISTRATION

INDEPENDENT ASSURANCE REPORT IN RELATION TO ICE CoT AND THE EU DEFORESTATION REGULATION

Introduction

ICE Benchmark Administration Limited ('IBA'), one of the world's most experienced administrators of regulated benchmarks and other market services, has launched the ICE Commodity Traceability Service ('ICE CoT').

ICE CoT is a technology platform that supports traders and operators with their EU Deforestation Regulation ('EUDR')¹ compliance obligations and the continued trade in compliant cocoa and coffee commodities and products in the EU.

IBA has appointed Ernst & Young LLP ('EY') to provide independent assurance regarding the description and design effectiveness of the control procedures set out in IBA's alignment matrix for ICE CoT. The alignment matrix is a table listing certain provisions of the EUDR which may be applicable to ICE CoT users, IBA's control objectives and the related control procedures in ICE CoT designed to support users in complying with these provisions, and EY's related assurance procedures (the 'EUDR Alignment Matrix').

This document provides some background to IBA and an overview of the EUDR and ICE CoT.

It also presents EY's assurance report and the EUDR Alignment Matrix.

Scope of the EUDR Alignment Matrix and Independent Assurance

IBA has commissioned EY to carry out a limited assurance engagement over the description and design effectiveness of the control procedures stated in the EUDR Alignment Matrix (the 'Company's Control Procedures'), that relate to the control objectives (the 'Company's Control Objectives') with regards to certain provisions of the EUDR which may be applicable to ICE CoT users.

The EUDR Alignment Matrix and independent assurance by EY are in respect of the description and design effectiveness of the Company's Control Procedures as at 22 January 2026.

EY have concluded that nothing has come to their attention that the control procedures described in the Company's ICE CoT EUDR Alignment Matrix, that relate to the control objectives to (i) support operators and traders in their compliance with the specified EUDR requirements related to due diligence and (ii) ensure adherence to the published ICE CoT Methodologies to collect, review and test the input data submitted by ICE CoT users, which were in place as at 22 January 2026, are not fairly stated, in all material respects, based on the control objectives.

EY's independent assurance report is also presented herein.

Background to IBA

IBA, a private limited company registered in England, is an independently capitalised subsidiary of Intercontinental Exchange, Inc. ('ICE') with a majority independent board comprised of both independent non-executive and executive directors. IBA has entered into contractual outsourcing arrangements with members of the ICE group for the provision of certain services, such as technology solutions, finance, legal and human resources.

IBA is authorised and regulated by the Financial Conduct Authority ('FCA') to carry out the Regulated Activity of "administering a benchmark" under the UK Benchmarks Regulation ('UK BMR')² and the Financial Services and

¹ Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010, as amended.

² Regulation (EU) 2016/1011 as it forms part of domestic law in the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 (as amended by, including but not limited to, The Benchmarks (Amendment and Transitional Provision) (EU Exit) Regulations 2019).

Markets Act 2000. IBA is recognised by the European Securities Markets Authority ('ESMA') as a benchmark administrator located in a third country under Article 32 of the EU Benchmarks Regulation ('EU BMR')³.

ICE CoT is an unregulated product and in particular is neither an index nor a benchmark for the purposes of the EU BMR or the UK BMR and nor is it an ESG rating for purposes of the ESG Ratings Regulation⁴ or any similar law. IBA has established and maintains an oversight and advisory committee in respect of ICE CoT. The ICE CoT Oversight and Advisory Committee comprises an independent chairperson and a broad range of experts and representatives from across the cocoa and coffee industries.

IBA has been established to administer financial and commodity benchmarks and provide other market administration services to the highest standards using the most advanced technology. IBA's systems infrastructure have been designed and purpose-built to facilitate data collection, calculation and validation in line with published methodologies, and output data publication and sharing, all supported by an extensive control framework. It is highly automated, resilient, user-friendly and secure. IBA's systems are fully auditable, with extensive back-up arrangements to allow for continued operation through disruptive events.

IBA is leading the way in benchmark and other market services administration and reform, operating to the highest standards, whilst evolving benchmarks and other market services to ensure they remain robust and relevant. Through transparent methodologies, comprehensive internal governance and independent oversight functions, IBA is able to provide market participants with confidence in the information they receive.

Overview of the EUDR

The EUDR entered into force on 29 June 2023 and aims to bring down greenhouse gas emissions and biodiversity loss by boosting the consumption of 'deforestation-free' products and reducing the EU's impact on global deforestation and forest degradation.

Under the EUDR, any operator who first places covered commodities and related products, including cocoa and coffee, on the EU market, must conduct due diligence and be able to demonstrate that the products are 'deforestation-free' and 'produced in accordance with the relevant legislation of the country of production'⁵. The EUDR is specified to repeal the EU Timber Regulation (subject to certain transitional arrangements).

In December 2024 and December 2025, the European Union amended the EUDR, introducing simplification measures and delaying its entry into application. The entry into application is currently expected as follows:

- Large and medium operators: 30 December 2026.
- Micro and small operators: 30 June 2027.
- Micro and small operators already covered by the EUTR: 30 December 2026.

Overview of ICE CoT

ICE CoT is operated and licensed by IBA. The platform supports the submission, storing, review, testing and sharing of due diligence information required under the EUDR, and helps users to demonstrate that cocoa and coffee commodities and related products are 'deforestation-free' and 'produced in accordance with the relevant legislation of the country of production' when entering the EU market.

There are three key categories of data uploaded by ICE CoT users which are reviewed and validated against the ICE CoT protocols and methodologies: 'Farm Plot Data'; 'Lawful Production and Compliance Risk Data'; and 'Physical Flow Traceability Data'.

³ Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014.

⁴ Regulation (EU) 2024/3005 of the European Parliament and of the Council of 27 November 2024 on the transparency and integrity of Environmental, Social and Governance (ESG) rating activities, and amending Regulations (EU) 2019/2088 and (EU) 2023/2859.

⁵ The terms 'deforestation-free' and 'relevant legislation of the country of production' are defined in the EUDR. Deforestation-free refers to land not subject to deforestation (conversion of forest to agricultural use) after 31 December 2020. Relevant legislation refers to laws applicable in the country of production concerning the legal status of the area of production in terms of: (a) land use rights; (b) environmental protection; (c) forest-related rules, including forest management and bio-diversity conservation, where directly related to wood harvesting; (d) third parties' rights; (e) labour rights; (f) human rights protected under international law; (g) the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples; (h) tax, anti-corruption, trade and customs regulations.

ICE CoT collects this data and conducts a series of reviews and tests in accordance with published protocols and methodologies⁶. This supports users in tracing commodities, and commodities used to derive the products, submitted on ICE CoT back to farm plots which are free of deforestation, and to aggregators and supply chains with systems and processes to demonstrate that the commodities have been lawfully produced.

The protocols and methodologies include validation tests to check that the uploaded data is complete, reasonable and consistent, and for deforestation and protected area overlaps, and require confirmation that systems and processes are in place to support legal compliance and confirm appropriate mitigation, and that systems and processes are in place to support traceability.

The systems, processes, evidence and information confirmed to be present in respect of the uploaded data are required to be available for inspection and verification on request under ICE CoT's independent 'Data Inspection and Verification Programme'.

A 'Risk Assessment Dashboard' for each country includes additional information to support users in demonstrating risk assessments against specified criteria.

ICE CoT also benefits from: a 'Membership Process' to review and, if appropriate, approve prospective ICE CoT users; 'Surveillance Procedures' to monitor input data and platform user behaviour; a 'Challenge Process' for users to request a review of certain Farm Plot Data test outcomes; a 'Grievance Procedure' to submit and address new information regarding risks of non-compliance of commodities and products on ICE CoT; and a 'Complaints Policy'.

Further information

IBA's contact details are:

- by email to: IBA@ice.com; and
- by post at: ICE Benchmark Administration Limited, 2nd Floor, Sancroft, Rose Street, Paternoster Square, London EC4M 7DQ.

Further details about IBA and its benchmarks and other services can be found at <https://www.theice.com/iba>

Disclaimer

The ICE CoT platform is provided by IBA to support users with their due diligence obligations under the EUDR. The ICE CoT platform collects and reviews or tests input data and uses the specifications, disclosure statements, methodologies and protocols described in the public methodology document to do so.

Users of ICE CoT, including any operators or traders with obligations under the EUDR, remain solely responsible for: (i) the commodities and products that they supply or acquire and any data or information associated with such commodities and products, including any data or information submitted to ICE CoT by any users; (ii) the status of such commodities and products as being deforestation-free and lawfully produced; and (iii) their own compliance and the compliance of such commodities and products with applicable EUDR requirements, including in each case regarding their own due diligence and the production, transfer, storage, processing, supply, import, and export of commodities and products, and for all transactions, record-keeping and reporting. IBA has no responsibility whatsoever for such commodities and products and data, or for any such status or compliance.

The ICE CoT platform outputs are based upon: (i) inputs of data provided by ICE CoT users pursuant to upload specifications, disclosure statements and other data requirements, who are and remain responsible to IBA for the accuracy and completeness of the data they submit to ICE CoT; and (ii) other third-party reference data. ICE CoT applies reviews and tests to the input data submitted by ICE CoT users in accordance with its protocols and methodologies. While the input data collected and these reviews and methodologies have been designed to support users in identifying data that may be inaccurate, incomplete, or which indicates commodities and products have been produced within deforested areas or in breach of applicable local laws, the ICE CoT platform outputs are not and should not be regarded as a conclusive and definitive confirmation that the input data was accurate and complete or that the relevant commodities and products are, or are not, deforestation-free and

⁶ https://www.ice.com/publicdocs/ICE_CoT_Public_Methodology.pdf

lawfully produced. There can be no guarantee that the reviews and tests will not validate inaccurate or incomplete data, or commodities and products produced on land within deforested areas or that have not been produced lawfully, or that the reviews and tests will not reject accurate and complete data, or commodities and products from land outside deforested areas and that have been produced lawfully. None of IBA, its affiliates, any third party providers of reference data to ICE CoT, or any service providers to ICE CoT, are liable for any input data that may be submitted to ICE CoT by any user, including any which may be inaccurate, incomplete, false or submitted fraudulently.

Registration of a parcel of commodities or products on ICE CoT does not confer legal or beneficial title or ownership to any commodities or products. A transfer of a parcel on ICE CoT from one holder to another does not transfer legal or beneficial title or ownership. Users of ICE CoT should ensure that they have taken professional advice and have appropriate contractual arrangements and legal protections in place with any counterparty regarding any commodities or products, including appropriate representations, warranties and covenants regarding compliance with applicable regulations, including, EUDR, and regarding the truthfulness, accuracy and completeness of any due diligence data, including any data uploaded on ICE CoT, in relation to such commodities or products.

Parcels of commodities or products registered on ICE CoT may be suspended or removed from the platform, including where new information indicates that the commodities or products are at risk of not complying with applicable ICE CoT or EUDR requirements. Users of ICE CoT may have their access suspended or terminated in certain circumstances, including for breaching the ICE CoT service agreement or usage rules.

None of ICE CoT, the data collected or the methodologies and protocols used by it can definitively establish or confirm that any commodity or product: (i) has been produced on land that is deforestation-free and has been lawfully produced; or (ii) is compliant with the EUDR, or that all due diligence required by the EUDR has been exercised.

ICE CoT is designed to support users in their own submission of due diligence statements to the EU information system through the ICE CoT platform. Each of ICE CoT, IBA, its affiliates, each third party provider of reference data to ICE CoT, and each service provider to ICE CoT, is not an authorised representative under the EUDR, does not submit due diligence statements on behalf of ICE CoT users, and is not responsible for submitting due diligence statements or for the compliance of relevant commodities or products referenced in a due diligence statement with the EUDR. ICE CoT users remain responsible for the submission of any due diligence statement in respect of any commodities and products required under EUDR. Where ICE CoT users use ICE CoT to submit a due diligence statement, they retain responsibility for the compliance of the relevant commodities or products referenced in the due diligence statement with the EUDR.

None of IBA, its affiliates, any third party providers of reference data to ICE CoT, or any service providers to ICE CoT, provides recommendations regarding commodities or products, or legal, financial, tax, or investment advice on any matter. None of the information available from ICE CoT should be taken as constituting a recommendation or legal, financial, tax, or investment advice.

IBA is authorised and regulated by the UK's Financial Conduct Authority to carry out the regulated activity of administering a benchmark under the UK Benchmarks Regulation and the Financial Services and Markets Act 2000. IBA is recognised by the European Securities Markets Authority as a benchmark administrator located in a third country under Article 32 of the EU Benchmarks Regulation. ICE CoT is an unregulated product and in particular is neither an index nor a benchmark for the purposes of the EU Benchmarks Regulation or the UK Benchmarks Regulation and nor is it an ESG rating for purposes of the ESG Ratings Regulation or any similar law. Accordingly, none of the regulatory protections of the EU Benchmarks Regulation, UK Benchmarks Regulation and ESG Ratings Regulation apply to ICE CoT, the inputs submitted to it, the outputs it provides or the methodologies and protocols it uses.

The information available from ICE CoT, IBA's website, and this document is provided for information purposes only. IBA is not responsible for and makes no representation regarding the appropriateness or suitability of trading in any commodities or products. The ICE CoT platform and all related data and information is provided 'as is' and each of IBA, each third party provider of reference data to ICE CoT, and each service provider to ICE CoT, gives no warranty and makes no representation as to fitness for purpose, satisfactory quality or timeliness of that data or information. In particular, each of IBA, each affiliate of IBA, each third party provider of reference data to ICE CoT, and each service provider to ICE CoT gives no warranty and makes no representation as to the

compliance of any commodities, products or related data or information with the EUDR. Any decision to trade (or not to trade) in specific commodities or products should not be made in reliance on the information available from ICE CoT.

Submitted data may be used in ICE CoT's methodologies and protocols and this input data and the outputs of the methodologies and protocols may be shared, including with other users, in accordance with ICE CoT's policies and procedures. All information and data submitted to ICE CoT, and all underlying data, documentation, evidence, systems and processes, is required to be made available for inspection and verification upon request in accordance with ICE CoT's inspection and verification programme and if requested by any national competent authority.

Access to ICE CoT is only available to entities which have executed a service agreement. To the fullest extent possible, none of IBA, Intercontinental Exchange, Inc. (ICE), ICE's affiliates, any third party providers of reference data to ICE CoT, any service providers to ICE CoT, or any of or its or their directors, employees, agents, advisors or consultants, will be liable in contract or tort (including, without limitation, negligence, breach of statutory duty or nuisance) or under statute (including under antitrust laws, environmental laws or the EUDR) in any jurisdiction or under the laws of any country, for misrepresentation or otherwise, regarding any inaccuracies, errors, omissions, delays, failures, cessations, or changes (material or otherwise) in ICE CoT or the information available from ICE CoT (including any input data, reference data or output data), or for any damage, expense or other loss (whether direct or indirect or consequential) that may be suffered relating to or in connection with the information available from ICE CoT or any reliance placed on it. All implied terms, conditions and warranties, including without limitation as to quality, merchantability, fitness for purpose, title or non-infringement, in relation to ICE CoT and the information available from it are excluded to the fullest extent possible.

Intellectual Property

IBA reserves all rights in ICE CoT, in the information available from ICE CoT and IBA's website, in the contents of this document, and in the methodologies described in this document. IBA has patents pending on a global basis including in the United States, Europe and Singapore in relation to ICE CoT. Each third party provider of reference data on ICE CoT, including Meridia, Space Intelligence, KPMG, FLOCERT, and the members of the IBAT Alliance (BirdLife International, Conservation International, International Union for Conservation of Nature and Natural Resources (IUCN) and The UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC)), reserves all rights in any data provided by it on ICE CoT.

This document, together with all contents therein including the methodologies described in this document, the information available from ICE CoT and IBA's website, together with all rights in and to each of the foregoing, including but not limited to all intellectual property rights, including patent, copyright, database, trademark and trade secret rights, along with all know how, and confidential information, are proprietary to and the exclusive property of IBA.

Information available on IBA's website and in this document are provided for information purposes only. Access to ICE CoT is provided subject to the terms of a written service agreement. Otherwise, none of these rights (including patent, copyright, trade secret and database rights, knowhow, and confidential information) or any of this information may be used in any capacity or for any purpose by any person without an express written licence from IBA.

"ICE", and "ICE Benchmark Administration" are trade marks of IBA or its affiliates. All rights in these trade marks are reserved, and none of these rights may be used without a written licence from IBA or its affiliates, as applicable.

Protected Area, Key Biodiversity Area, and Species data reproduced and incorporated under licence from the Integrated Biodiversity Assessment Tool (IBAT) (<https://www.ibat-alliance.org/>). IBAT is provided by the BirdLife International, Conservation International, IUCN and UNEP-WCMC. Contact ibat@ibat-alliance.org for further information.

ICE CoT EUDR deforestation maps are used under licence from Space Intelligence, a leading provider of audit-grade nature mapping data.

The ICE CoT Farm Plot Data Validation Methodology has been developed with Meridia, an agtech company specialised in field data solutions in complex and smallholder-heavy agri-commodity supply chains such as cocoa and coffee.

The Lawful Production and Compliance Risk Disclosure Statements and Review Protocol have each been developed with the support of KPMG Netherlands and legal and sustainability experts across the KPMG global network.

IBA has appointed FLOCERT GmbH to be the independent field auditor for the ICE CoT platform. FLOCERT will conduct audits and inspections regarding information, systems and evidence which support the data uploaded to ICE CoT in accordance with ICE CoT's Data Inspection and Verification Programme, which is being designed and implemented with the support of FLOCERT. FLOCERT is a leading global assurance provider offering certification, verification, and customised sustainability to support companies sourcing on fair principles.

The services provided by FLOCERT are limited to providing audit services in accordance with ICE CoT's Data Inspection and Verification Programme.

FLOCERT will only be able to provide audit services upon provision of and access to the auditable data from ICE CoT users in accordance with ICE CoT's Data Inspection and Verification Programme. All uploaded data, and all systems, processes and data confirmed to be present by ICE CoT users including in disclosure statement responses is required to be available for inspection and verification on request under ICE CoT's Data Inspection and Verification Programme.

Statement of adherence

IBA is responsible for the identification of the control objectives for our business and the design of IBA's control procedures to effectively address the provisions of the EUDR and the ICE CoT Methodologies.

In the attached ICE CoT EUDR Alignment Matrix, IBA sets out a description of the relevant frameworks and control procedures together with the related control objectives and EUDR Requirements and IBA confirms that:

- i. The ICE CoT EUDR Alignment Matrix describes fairly the control procedures which were in place as at 22 January 2026 in relation to ICE CoT; and
- ii. The control procedures are suitably designed such that the specified control objectives, including the provisions of the EUDR and the ICE CoT Methodologies, can be achieved and to our knowledge and belief the described control procedures were complied with as at 22 January 2026 in relation to ICE CoT.

Sign on behalf of ICE Benchmark Administration Limited,

Signed by:


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Clive de Ruig

President, ICE Benchmark Administration

02 March 2026

Independent practitioner's assurance report to the directors of ICE Benchmark Administration Limited (the 'Company') in respect of the ICE Commodities Traceability (ICE CoT) platform to support users with their due diligence and other related obligations under EU Deforestation Regulation (Regulation (EU) 2023/1115, as amended by the Regulation 2024/3234, together "EUDR") as at 22 January 2026.

Use of report

This report is produced in accordance with the terms of our engagement letter dated 25 July 2025 for the purpose of reporting to the Directors of ICE Benchmark Administration Limited (the 'Company') in connection with the limited assurance engagement over the description and design effectiveness of the Company's control procedures that relate to ICE CoT platform to (i) support operators and traders in their compliance with the specified EUDR requirements (including related to due diligence) and (ii) ensure adherence to the ICE CoT Methodologies as at 22 January 2026.

This report is made solely to the Company's Directors, as a body, in accordance with our engagement letter dated 25 July 2025. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's Directors as a body, for our examination, for this report, or for the conclusions we have formed.

Our work has been undertaken so that we might report to the Directors those matters that we have agreed to state to them in this report and for no other purpose. Our report must not be recited or referred to in whole or in part in any other document nor made available, copied or recited to any other party, in any circumstances, without our express prior written permission. This engagement is separate to, and distinct from, our appointment as the auditors to the company.

Responsibilities of the Company

As Directors of the Company you are responsible for ensuring that the Company designs, implements and monitors adherence with policies, procedures and methodologies in respect of the ICE CoT platform to support users with their due diligence obligations under EUDR. You are responsible ensuring the Company establishes and maintains appropriate internal control systems. You are also responsible for preparing the ICE CoT EUDR Alignment Matrix including the related control objectives, control procedures and Methodologies.

Responsibilities of Ernst & Young LLP

Our responsibilities for this engagement are to form an independent conclusion, based on the work carried out in relation to the control procedures and Methodologies as described in the ICE CoT EUDR Alignment Matrix and report this to you as the Directors of the Company.

Our approach

We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) (UK) 3000 (July 2020) Assurance engagements other than audits or reviews of historical financial information ("ISAE (UK) 3000 (July 2020)") as promulgated by the Financial Reporting Council (FRC). The criteria against which the control procedures were evaluated are the control objectives for the ICE CoT Platform as set out within the ICE CoT EUDR Alignment Matrix, identified by the Company's Directors as relevant control objectives to i) support operators and traders in their compliance with the specified EUDR requirements (including related to due diligence) and ii) ensure adherence to the published ICE CoT Methodologies to collect, review and test the input data submitted by ICE CoT users. Our work was based upon obtaining an understanding of the control procedures as described in the EUDR Alignment Matrix, and evaluating the ICE CoT EUDR Alignment Matrix to obtain limited assurance so as to form our conclusion.

In performing this engagement, we have applied International Standard on Quality Management (ISQM) 1 and the independence and other ethical requirements of the Institute of Chartered Accountants of England and Wales (ICAEW) Code of Ethics (which includes the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA)).

We have performed the procedures agreed with you and set out in our engagement letter dated 25 July 2025.

The nature, timing and extent of the tests we applied and the criteria against which the control procedures were evaluated are detailed in the ICE CoT EUDR Alignment Matrix.

The objective of a limited assurance engagement is to perform such procedures as to obtain information and explanations in order to provide us with sufficient appropriate evidence to express a negative conclusion on the Company's ICE CoT EUDR Alignment Matrix. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently the level of assurance obtained in a limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.



Shape the future
with confidence

Ernst & Young LLP
25 Churchill Place,
London,
E14 5EY

Tel: + 44 20 7951 2000
Fax: + 44 20 7951 1345
ey.com

Inherent limitations

Our conclusion is based on historical information and the projection of any information or conclusions in the attached report to any future periods would be inappropriate. Our examination excludes audit procedures such as verification of all assets, liabilities and transactions and is substantially less in scope than an audit performed in accordance with International Standards on Auditing (UK) and therefore provides a lower level of assurance than an audit. Accordingly we do not express an audit opinion on the information

The validity and reliability of the ICE CoT Platform outputs are dependent on both (i) those who submit data including but not limited to ICE CoT users or provide information including but not limited to third-party reference data to the Company, for which submitters or data providers are responsible, and (ii) the procedures performed by the Company to analyse that information. We performed no procedures on, and express no assurance over, source data submitted and information provided by these third parties. For the avoidance of doubt, we did not conduct any site visits to, or review the data provided by any ICE CoT users when submitting information to the ICE CoT Platform, nor did we review any third-party reference data provided to the Company to perform its reviews and tests on the input data submitted by ICE CoT users in accordance with its Methodologies. We express no assurance over the third-party reference data, or submitted user data used by the Company for the purpose of supporting its users with their due diligence obligations under EUDR.

Control procedures designed to address specified control objectives are subject to inherent limitations and, accordingly, errors or irregularities may occur and not be detected. Such control procedures cannot guarantee protection against (among other things) fraudulent collusion especially on the part of those holding positions of authority or trust. The ICE CoT platform outputs are not and should not be regarded as a conclusive and definitive confirmation that the input data was accurate and complete or that the relevant commodities and products are, or are not, deforestation-free and lawfully produced. Furthermore, our conclusion is based on historical information and the projection of any information or conclusions in the attached report to any future periods would be inappropriate.

Conclusion

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the control procedures described in the Company's ICE CoT EUDR Alignment Matrix, that relate to the control objectives to (i) support operators and traders in their compliance with the specified EUDR requirements related to due diligence and (ii) ensure adherence to the published ICE CoT Methodologies to collect, review and test the input data submitted by ICE CoT users, and which were in place as at 22 January 2026, are not fairly stated, in all material respects, based on the control objectives.

Ernst & Young LLP

Ernst & Young LLP

London, UK

2 March 2026

ICE CoT EUDR Alignment Matrix: Control Objectives/Control Procedures

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
Article 3 (Prohibition)		
<p><u>Article 3</u> “Relevant commodities and relevant products shall not be placed or made available on the market or exported, unless all the following conditions are fulfilled: [...]”</p>	<p>“(a) they are deforestation-free;”</p> <p>1.1 Objective – Deforestation-free <i>To provide a platform (ICE CoT) which supports users with their EUDR compliance obligations, in particular regarding demonstrating and assessing that uploaded parcels of relevant commodities and relevant products are ‘deforestation-free’ (as defined in the EUDR).</i></p> <p>Control procedures:</p> <p>Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols</p> <p>ICE CoT contains input data specifications and disclosure statements along with validation methodologies and review protocols to support users in demonstrating the required due diligence and compliance requirements.</p> <ul style="list-style-type: none"> <i>Farm Plot Validation Methodology</i> <p>The platform collects farm plot geolocation and other related data from all potential production plots in accordance with the ICE CoT Farm Plot Data Input Specification. The data is tested against the ICE CoT Farm Plot Data Validation Methodology.</p> <p>This methodology uses mapping data from Space Intelligence, protected area information obtained from the Integrated Biodiversity Assessment Tool (IBAT) and additional data from Meridia. It applies a series of tests to the specified data, including whether farm plots are located on land identified as being subject to Deforestation after 31 December 2020 or on land identified as being legally protected areas, and whether the data is reasonable and consistent.</p> <p>A farm plot and the associated farmer is only eligible to be referenced in an ICE CoT parcel once all required data has been provided in accordance with the specification and all tests have been passed in accordance with the methodology.</p> <p>The ICE CoT Farm Plot Data Input Specification and ICE CoT Farm Plot Data Validation Methodology have been developed with the support of the ICE CoT Advisory and Oversight Committee (AOC) (refer to section 1.6 regarding the Oversight Function). They are kept under review by IBA and reviewed by the AOC annually. They are subject to the Changes processes described in section 1.13.</p> <p>Failed farm plot data tests are reported to the user for information and potential remediation. Certain deforestation and protected area test results may be challenged pursuant to the ICE CoT Challenge Process. IBA’s ICE CoT Challenge process allows users to challenge the outcome of certain Farm Plot Data Validation Methodology</p>	<ul style="list-style-type: none"> We obtained the ICE CoT Farm Plot Input Data Specification and inspected for evidence of the required data to be collected by the platform. We obtained the ICE CoT Farm Plot Data Validation Methodology and inspected for evidence of the validation tests the plots are tested against. We obtained the Terms of Reference for the Advisory and Oversight Committee (AOC) and inspected for evidence of annual review of the ICE CoT Farm Plot Data Validation Methodology and the ICE CoT Farm Plot Input Data Specification. Please refer to EY’s response to sections 1.6 and 1.13. We obtained the ICE CoT Challenge Procedures and inspected for evidence of the challenge process for users for failed Farm Plot Data Validation Methodology outcomes. Please refer to EY’s response to section 1.17. We obtained the ICE CoT Physical Flow Traceability Input Data Specification and inspected for evidence of the required data to be collected by the platform. We obtained the ICE CoT Physical Flow Traceability Input Data Validation Methodology and inspected for evidence that the validation tests are as described in the ICE CoT Control Procedures. We obtained the Aggregator Systems Disclosure Statement, Lawful Production and Compliance Risk Disclosure Statement, Physical Flow Traceability Disclosure Statement, Transport and Shipping Disclosure Statement, and Exchange Warehouse Traceability Disclosure Statement and inspected for evidence that enquiries request confirmation of the existence of systems and processes at aggregators and supply chain control points (e.g. processing facilities and warehouses).

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	<p>outcomes (for areas of deforestation and protected areas) and is documented in the ICE CoT Challenge Procedures. The Challenge Procedures are reviewed by the AOC annually. Farm Plot challenges are outsourced to Meridia to perform the review (refer to section 1.17 on Outsourcing).</p> <p>IBA offers an outline plot tool (currently only for Brazil) using satellite imagery as a means to enable users to create geometry data for production areas for cocoa and coffee farms, where the overall farm boundary is available but the cocoa and coffee production areas within the farm are not already mapped. Users must review and may amend this geometry data before determining whether the data is suitable to submit to ICE CoT. The outline plot tool is not a part of the ICE CoT Farm Plot Validation Methodology.</p> <ul style="list-style-type: none"> • <i>Traceability Validation Methodology</i> <p>The platform collects physical flow traceability data for all parcels in accordance with the ICE CoT Physical Flow Traceability Input Data Specification. The data is tested against the ICE CoT Physical Flow Traceability Input Data Validation Methodology.</p> <p>This specification and methodology uses a ‘traceability-tree’ concept to build a chain of physical flow traceability data, connecting each parcel through a series of events to the applicable eligible production farm plots and associated farmers which have passed all applicable Farm Plot Data Validation Methodology tests, and the applicable eligible aggregators which have satisfied the requirements under the Aggregator Systems and Lawful Production and Compliance Risk Disclosure Statements and Review Protocols. The tests and reviews also enquire as to whether the data is reasonable and consistent.</p> <p>Events in traceability trees must refer to eligible aggregators, eligible facilities, eligible exchange warehouses and/or eligible transport and shipping countries. The platform requires the completion of an Aggregator Systems Disclosure Statement, Lawful Production and Compliance Risk Disclosure Statement, Physical Flow Traceability Disclosure Statement, Transport and Shipping Disclosure Statement, and Exchange Warehouse Traceability Disclosure Statement, as applicable, to collect information regarding IMS and traceability systems and processes in place at these key supply chain control points to demonstrate that required parcel identification, recording and tracking is present. Responses are reviewed against the relevant Disclosure Statement Review Protocol to assess whether the user has confirmed the control points have the necessary systems and processes in place.</p> <p>Failed tests and reviews are reported to the user for information and potential remediation.</p> <p>A parcel referencing farm plot data and physical flow data control points is only eligible for registration on ICE CoT, and to be transferred on the platform, once all required Farm Plot Data, Disclosure Statement responses and Physical Flow Traceability Data has been provided and all reviews and tests pursuant to the</p>	<ul style="list-style-type: none"> • We performed a walkthrough of ICE CoT Platform for evidence of the elements as described in the ICE CoT Control Procedures on the methodologies. • As noted in the ICE CoT Control Procedures, the outline plot tool is not part of the ICE CoT Farm Plot Validation Methodology and therefore does not form part of our assurance, and accordingly no EY procedures were performed. • We performed a walkthrough of the ICE CoT Platform for evidence that the platform requires completion of the Aggregator Systems Disclosure Statement, Lawful Production and Compliance Risk Disclosure Statement, Physical Flow Traceability Disclosure Statement, Transport and Shipping Disclosure Statement, and Exchange Warehouse Traceability Disclosure Statement, as applicable. • We obtained the Terms of Reference of the AOC and inspected for evidence of their responsibilities for the oversight of design and operation of the ICE CoT Platform. • We obtained the Terms of Reference of the AOC and inspected for evidence of annual review of the Physical Flow Traceability Input Data Specification and Input Data Validation Methodology, and the Disclosure Statements and Review Protocols. • Please refer to EY’s response to sections 1.13, 1.4 and 1.5.

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	<p>methodologies and review protocols have been passed. In particular, a Shipping Event requires the submission of a scan of a Bill of Lading document which is subject to certain checks under the Physical Flow Traceability Input Data Validation Methodology. The scan must be provided and tests must be passed for a relevant parcel in order to create a badge on ICE CoT.</p> <p>The ICE CoT Physical Flow Traceability Input Data Specification and ICE CoT Physical Flow Traceability Input Data Validation Methodology, and the Disclosure Statements and Review Protocols, have been developed with the support of the AOC. They are kept under review by IBA and reviewed by the AOC annually. They are subject to the Changes processes described in section 1.13.</p> <p>Third Party Desk and Field-Based Inspection Programme</p> <p><i>Please see the section 1.4 on Third Party Desk and Field-Based Inspection Programme regarding audits to support and check the truthfulness, accuracy and completeness of the Farm Plot Data, Physical Flow Traceability Input Data and Disclosure Statement Responses.</i></p> <p>Control Framework</p> <p><i>Please see the section 1.5 on the Control Framework (including controls regarding oversight, governance, transparency, membership, surveillance, platform operations, complaints, changes, operational risk management, employee skills, knowledge and experience, audit, outsourcing, information security, business continuity, along with grievance and record retention).</i></p>	
<p>“(b) they have been produced in accordance with the relevant legislation of the country of production; and”</p>	<p>1.2 Objective – Lawfully Produced</p> <p><i>To provide a platform (ICE CoT) which supports users with their EUDR compliance obligations, in particular regarding demonstrating and assessing that uploaded parcels of relevant commodities and relevant products ‘have been produced in accordance with the relevant legislation of the country of production’ (as defined in the EUDR).</i></p> <p>Control procedures:</p> <p>Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols</p> <p>The platform includes Disclosure Statements and Review Protocols to support users in demonstrating the required due diligence and compliance requirements.</p> <ul style="list-style-type: none"> • <i>Farm Plot Validation Methodologies</i> <p><i>Please see section 1.1 Deforestation Free, specifically on the ICE CoT Farm Plot Validation Methodology which uses protected area information obtained from IBAT</i></p>	<ul style="list-style-type: none"> • Please refer to EY response on section 1.1. • We obtained the relevant Disclosure Statements and inspected these for evidence of the elements as described in the ICE CoT Control Procedures. • We performed a walkthrough of the ICE CoT Platform for evidence that upon opening a Lawful Production and Compliance Risk Disclosure Statement, and a Tax Anti-corruption, Trade and Customs Disclosure Statement, a Lawful Production Annex is shown to the user. • Please also refer to EY response on section 1.17. • We performed a walkthrough of the Disclosure Statement review process in the ICE CoT Platform for evidence that responses to Disclosure Statements are reviewed against the automatic Disclosure Review Statement Protocol, or taken through internal review process, and failed reviews are reported to the user.

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	<p><i>and additional data from Meridia to test to whether farm plots are located on land identified as being legally protected areas.</i></p> <ul style="list-style-type: none"> <i>Lawful Production Validation Methodology</i> <p>The platform requires the completion of (1) an Aggregator Systems Disclosure Statement for all aggregators from which parcels are sourced, (2) a Lawful Production and Compliance Risk Disclosure Statement for all aggregators from which parcels are sourced and all production countries, and, (3) as applicable, a Tax Anti-corruption, Trade and Customs Disclosure Statement for all parcels transferred to a user in a production origin.</p> <p>Each Lawful Production and Compliance Risk Disclosure Statement and each Tax Anti-corruption, Trade and Customs Disclosure Statement incorporates a reference to a list of applicable laws by topic for each applicable production origin (the Lawful production Annexes). The lists are obtained through an expert legal and sustainability review conducted by KPMG local member firms (and certain other approved third parties), KPMG Netherlands central sustainability group (refer to section 1.17 Services, Vendors and Outsourcing), and IBA legal, and are reviewed annually. The Disclosure Statements also incorporate a reference to a list of applicable mitigation measures for each legal topic (the Mitigation Annexes).</p> <p>The Disclosure Statements collect information regarding information management systems and processes (IMS) and, as applicable, mitigation measures in place at aggregators and the related supply chains for the purposes of ensuring that lawful compliance and risk management is present at these control points and the associated farmers and farm plots and related supply chains including with respect to land use rights; environmental protection; the rights of third parties such as indigenous peoples, local communities and other customary tenure rights holders or civil society organisations; labour rights and human rights; and tax, anti-corruption, trade and customs.</p> <p>The Aggregator Systems Disclosure Statement collects general information regarding the IMS in place and the Lawful Production and Compliance Risk Disclosure Statement and each Tax Anti-corruption, Trade and Customs Disclosure Statement collects specific information regarding the IMS by reference to the specified legal topics and the applicable laws in the relevant jurisdiction, and the applicable mitigation measures.</p> <p>Responses are reviewed against the relevant Disclosure Statement Review Protocol and, where required, by an internal review process, to assess whether the user has confirmed the aggregators and related supply chains have the necessary IMS and, as required, mitigation measures, in place.</p> <p>Failed reviews are reported to the user for information and potential remediation.</p> <ul style="list-style-type: none"> <i>Traceability Validation Methodology</i> 	<ul style="list-style-type: none"> We obtained the internal ICE CoT Disclosure Statement Review Policy and inspected for the review process for long form text responses. We obtained the ICE CoT Physical Flow Traceability Specification and the ICE CoT Physical Flow Traceability Input Data Validation Methodology and inspected for evidence of the elements as described in the ICE CoT Control Procedures. Please refer to EY's response to Article 3(a). Please also refer to EY's response to section 1.4 and section 1.5.

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	<p>The platform collects physical flow traceability data for all parcels in accordance with the ICE CoT Physical Flow Traceability Input Data Specification, which is tested against the ICE CoT Physical Flow Traceability Input Data Validation Methodology.</p> <p>This specification and methodology uses a ‘traceability-tree’ concept to build a chain of physical flow traceability data, connecting each parcel through a series of events to the applicable eligible production farm plots and associated farmers which have passed all applicable Farm Plot Data Validation Methodology tests and the applicable eligible aggregators which have satisfied the requirements under the Aggregator Systems and Lawful Production and Compliance Risk Disclosure Statements and Review Protocols.</p> <p><i>Please also see the response to Article 3(a).</i></p> <p>Third Party Desk and Field-Based Inspection Programme</p> <p><i>Please see section 1.4 Third Party Desk and Field-Based Inspection Programme regarding audits to support and check the truthfulness, accuracy and completeness of the Disclosure Statement Responses and the Physical Flow Traceability Input Data.</i></p> <p>Control Framework</p> <p><i>Please see section 1.5 Control Framework including controls regarding oversight, governance, transparency, membership, surveillance, platform operations, complaints, changes, operational risk management, employee skills, knowledge and experience, audit, outsourcing, information security, business continuity, along with grievance and record retention).</i></p>	
<p>“(c) they are covered by a due diligence statement or a simplified declaration, as required by relevant provisions of this Regulation.”</p>	<p>1.3 Objective – DDS Submission</p> <p><i>To provide a platform which supports users with their EUDR compliance obligations, in particular allowing users to submit due diligence statements to the EU information system in respect of parcels of relevant commodities and relevant products that have satisfied all ICE CoT requirements. As per the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.</i></p> <p>Control procedures:</p> <p>The Usage Rules oblige users to submit Due Diligence Statements (DDS) that are required in respect of any parcel on ICE CoT through the ICE CoT system (i.e. on import into (import DDS), export from (export DDS) and any supply within the EU (Domestic Production DDS)).</p> <p>When a Parcel is submitted with a scan of a Bill of Lading, the ICE CoT system will set the status to ‘pending review’ if all required data is provided and other all applicable validation tests are passed. Only once the Bill of Lading has been reviewed</p>	<ul style="list-style-type: none"> • We obtained the Usage Rules and inspected for evidence that users are obliged to submit DDSs for any parcel on ICE CoT through the ICE CoT system. • We performed a walkthrough of the ICE CoT Platform and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the Usage Rules and inspected for evidence that neither IBA nor ICE CoT submit DDS on behalf of operators as an Authorised Representative.

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	<p>and passed by IBA Operations, will an ICE CoT Badge be issued and a DDS become eligible for submission.</p> <p>The platform requires users to submit DDS using their own (or an Authorised Representative's) log-in credentials for the EU Information System (EUIS) in respect of parcels of relevant commodities and relevant products registered on ICE CoT (i.e. that have all required input data and have satisfied all ICE CoT methodology requirements).</p> <p>The platform supports the input of data required by the EUIS to populate the DDS for an ICE CoT parcel.</p> <p>Neither IBA nor ICE CoT will be submitting DDS themselves as operators or for or on behalf of operators as an Authorised Representative.</p> <p>Once a DDS has been submitted to the EUIS through the platform, ICE CoT will store the information, the DDS reference number and the validation key for future DDS submissions that need to refer to Parcels submitted based on that previous DDS.</p>	
<i>Third Party Desk and Field-Based Inspection Programme</i>		
	<p><i>1.4 Objective - Third Party Desk and Field-Based Inspection Programme</i></p> <p><i>To support ICE CoT's data collection, review protocol and validation methodology processes through the implementation of a Third Party Desk and Field-Based Inspection Programme, operated by an independent third party, which is designed to assess the accuracy, completeness and truthfulness of data submitted to the ICE CoT Platform.</i></p> <p><i>Control procedures:</i></p> <p>ICE CoT uses a risk-based (with random selection) third-party desk and field-based independent Data Inspection and Verification Programme to support the input data collection, and the review protocol and validation methodology processes.</p> <p><i>User Record Keeping</i></p> <p><i>Please see section 10.2 on User Record Keeping regarding requirements on users to keep records and evidence related to the data they have submitted to ICE CoT and providing or procuring access to IBA's auditors.</i></p> <p>IBA has appointed FLOCERT to design and implement the programme as the independent field auditor for ICE CoT.</p> <p>Audit reports will be issued to document the outcomes, which may result in feedback to users and persons in their supply chains or the possibility of further action,</p>	<ul style="list-style-type: none"> • We obtained and inspected the Third Party Desk and Field-Based Inspection Programme for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained and inspected the contractual agreement between IBA and FLOCERT for evidence that FLOCERT were appointed to design and implement the programme as the independent field auditor for ICE CoT. • Please refer to EY's response to section 10.2. • We obtained the Terms of Reference of the AOC and inspected for evidence of the annual review of the Data Inspection and Verification Programme. • We obtained the Terms of Reference of the internal ICE CoT Inspection Programme Review Committee (IPReC) and inspected for evidence of the elements as described in the ICE CoT Control Procedures.

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	<p>including in accordance with the ICE CoT Grievance Procedure (e.g. an audit identifying a risk of non-compliance would be submitted as a grievance for review).</p> <p>The ICE CoT Data Inspection and Verification Programme is reviewed by the AOC annually. Further, the internal ICE CoT Inspection Programme Review Committee (IPReC) reviews and assesses FLOCERT's reports and any findings or conclusions following the completion of any field or desk-based audits.</p>	
<i>Control Framework</i>		
	<p><i>1.5 Objective – Control Framework</i></p> <p><i>To establish a robust Control Framework alongside ICE CoT's data collection, review protocol and validation methodology processes to support users in demonstrating and assessing the required due diligence and compliance requirements.</i></p> <p><i>Control procedures:</i></p> <p>IBA has a documented IBA Control Framework for ICE CoT. This is subject to continuous IBA review and is reviewed and approved by the IBA Board annually.</p> <p>The Control Framework sets out the various control activities together with the associated documentation and/or evidence, the document owner (which is the function responsible for maintaining the documentation), the control type (whether a control is: manual and/or automated; preventative and/or detective) and the control owner (which is the function responsible for design, implementation and/or approval of the control).</p> <p>IBA's ICE CoT Control Framework is proportionate in consideration of the objectives and the nature of the input data and methodology reviews and tests. It includes the following activities (listed by reference to their control objective and procedures):</p> <ul style="list-style-type: none"> (A) Oversight Function (section 1.6) (B) Governance and Conflicts of Interest Management (section 1.7) (C) Transparency (section 1.8) (D) Membership (section 1.9) (E) Surveillance (section 1.10) (F) Platform Operations (section 1.11) (G) Complaints (section 1.12) (H) Changes (section 1.13) (I) Operational Risk Management (section 1.14) (J) Employee Skills, Knowledge and Experience (section 1.15) (K) External Audit (section 1.16) (L) Services, Vendors and Outsourcing (section 1.17) (M) Information Security (section 1.18) (N) Business Continuity and Disaster Recovery (section 1.19) 	<ul style="list-style-type: none"> • We obtained the IBA Control Framework for ICE CoT and inspected for evidence that it includes activities A – N. • We obtained the IBA Governance Manual and inspected for evidence of annual review and approval of the Control Framework by the IBA Board. • Please also refer to EY's response to section 13.1 and 10.3.

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	<p><i>Please also refer to sections 13.1 on Grievance and 10.3 on ICE CoT Record Retention for information on these activities (and their control objectives and procedures), which also form a part of the control framework.</i></p>	
	<p>1.6 Objective - Oversight Function</p> <p><i>To establish and maintain an effective advisory and oversight function for ICE CoT with robust terms of reference and constituted so as to provide constructive challenge and guidance.</i></p> <p>Control Procedures:</p> <p>The ICE CoT Advisory and Oversight Committee (AOC) provides independent oversight of the design and operation of the ICE CoT Platform. The AOC is comprised of a balanced representation of key stakeholders with an independent Chair and is governed by Terms of Reference which are published on ICE CoT’s website. The Terms of Reference are reviewed annually by the AOC and approved by the IBA Board. Individuals serve on the Committee in their own right and not as representatives of their employer organisations</p> <p>The Terms of Reference include:</p> <ul style="list-style-type: none"> • Providing independent governance and direction for ICE CoT; • Providing guidance to IBA on the design and implementation of ICE CoT. • Reviewing and overseeing the input data specifications, validation methodologies and review protocols for ICE CoT at least annually; • Reviewing and overseeing frameworks, procedures and processes for ICE CoT, at least annually; • Receiving, reviewing and providing feedback on information with regard to the operation and performance of ICE CoT; • Recommending changes to ICE CoT where appropriate and considering and providing feedback on proposed changes to ICE CoT; • Providing an important and authoritative voice in respect of ICE CoT, to include assisting IBA in the formulation of feedback to regulatory and governmental organisations in the EU and globally regarding deforestation legislation, and to support ICE CoT in any discussions with industry associations and NGOs; • Reviewing and overseeing the work of the ICE CoT Technical Working Group and any other working group or sub-committee appointed by the Committee; • Assessing internal and external audits or reviews insofar as they affect ICE CoT and monitoring the implementation of identified remedial actions; and • Considering existing or potential conflicts of interest and establishing whether they are material. 	<ul style="list-style-type: none"> • We obtained the Terms of Reference for the AOC and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the Terms of Reference for the AOC and inspected for evidence of the requirement for annual review by the AOC and approval by IBA Board. • We obtained an example Letter of Appointment and Conflicts of Interest Form, and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We inspected the ICE CoT website for evidence that the criteria for selection and withdrawal of committee members is published, and that these criteria contained the elements as described in the ICE CoT Control Procedures. • We obtained the IBA Governance Manual and inspected for evidence of the elements as described in the ICE CoT Control Procedures, including reference to annual review by the IBA Nomination and Corporate Governance Committee. • We inspected the ICE CoT website for evidence that the names of the Committee members and conflicts of interest declarations are published. • We inspected the ICE CoT website for evidence that the public minutes of meetings are made available.

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	<p>External AOC members are required to sign a standard Letter of Appointment and complete a standard Conflicts of Interest Form, must comply with IBA’s conflicts of interest policy and strict confidentiality provisions. Committee members must declare any potential Conflicts of Interest on appointment and as they arise. Where a Committee member has a conflict during a meeting item this must be declared and the member must excuse themselves from participating in the discussion of or decision making relating to such item. Committee members with an actual or potential material conflict of interest on a particular matter are not allowed to vote on that matter. Where a Committee member has a conflict that cannot be managed or adequately mitigated, they may be recused from a meeting or, if the conflict is likely to persist, asked to resign.</p> <p>The criteria for selection and withdrawal of committee members are published on ICE CoT’s website. These include:</p> <ul style="list-style-type: none"> • deep knowledge and expertise to bring to Committee deliberations; • have roles for which benchmarks or data services are relevant but who are not faced with any conflict of interest that cannot be readily managed; • are committed to acting in the interests of ICE CoT; • are willing and able to attend meetings regularly; • are able to provide constructive challenge; • are both attentive to detail and able to bring a broad industry perspective; • are respected as individuals in their area of specialism; and • appreciate the importance of the benchmark or data service and its accuracy, integrity and relevance. <p>IBA’s Governance Manual sets out IBA’s procedures and Terms of Reference regarding the AOC, including forward-looking agendas. The Governance Manual is reviewed at least annually by IBA’s Nominating and Corporate Governance Committee. Any substantive changes are subject to approval by the IBA Board.</p> <p>IBA publishes the names of Committee members and any declarations of conflicts of interest on the ICE CoT website. AOC minutes are recorded and public versions are made available on the ICE CoT website.</p> <p>A surveillance update and the review of any operational incidents are standing agenda items for the AOC.</p>	
	<p>1.7 Objective - Governance and Conflicts of Interest Management</p> <p><i>To have in place robust measures for managing conflicts of interest and in particular any actual or perceived conflict arising from IBA’s place in the ICE group. Appropriate disclosure and confidentiality measures should be in place. The associated policies and procedures should be regularly reviewed and updated.</i></p>	<ul style="list-style-type: none"> • We obtained the organisational structure for IBA and inspected for evidence that the employees report directly/indirectly to the President of IBA and reporting lines are separate from the ICE group.

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	<p>Control Procedures:</p> <p>IBA is an independent and separately capitalised company with an independent Board of Directors, comprised of both independent non-executive and executive directors. The majority of IBA's directors are Independent Non-Executive Directors (INEDs). IBA is a distinct business for the administration of benchmarks and other data and services within the ICE group.</p> <p>IBA has a clear organisational structure: IBA reporting lines are separate from the ICE group with all IBA employees reporting directly or indirectly to the President of IBA. IBA roles and responsibilities are defined in a consistent manner for all persons involved in ICE CoT.</p> <p>All IBA employees are bound, inter alia, by:</p> <ul style="list-style-type: none"> • IBA's Conflict of Interest Policy; • ICE group's Personal Trading Policy; • ICE group's Reporting and Anti-Fraud Policy; • ICE group's Anti-Money Laundering, Anti-Tax Evasion and Sanctions Policy; • ICE group's Anti-Bribery policy; • ICE group's Business Gifts, Meals and Entertainment Policy; • ICE group's Taping and Recording Policy; • ICE group's Disclosure and Corporate Communications Policy; • ICE group's Anti-Trust Compliance Manual; • ICE group's Record Retention Policy; • ICE group's Corporate Business Continuity Policy; • ICE group's Code of Business Conduct; • ICE group's Personal Information Protection Principles; and • ICE Corporate Information Security Policy. <p>IBA employees receive compliance training provided online annually by the ICE group.</p> <p>IBA's Conflict of Interest Policy describes the arrangements for the identification, management, disclosure and mitigation of conflicts of interests. The policy is subject to annual review and approval by the IBA Board.</p> <p>IBA's Conflict of Interest Policy is supported by procedures and conflicts of interest registers which record conflicts identified, corresponding mitigants and owners of conflict management, including in relation to relationships with ICE group entities. Any conflict of interest that might arise due to IBA's ownership is, accordingly, properly managed.</p>	<ul style="list-style-type: none"> • We obtained the ICE Global Code of Business Conduct and inspected for evidence that employees are bound inter-alia by the policies listed in the ICE CoT Control Procedures. • We obtained evidence of completion of the compliance training provided online annually by the ICE group. • We obtained the IBA Conflict of Interest Policy and inspected for evidence that it describes the arrangements for the identification, management, disclosure and mitigation of conflicts of interest, and evidence of the requirement for annual review and approval by the IBA Board. • We obtained the IBA Conflict of Interest Register and inspected for evidence that ICE CoT related conflicts and mitigants have been recorded. • We obtained the ICE Global Code of Business Conduct and inspected for evidence that ICE employees are subject to strict confidentiality provisions. • We inspected the IT General Controls (ITGCs) in place for IBA for evidence that user access and change management in the system is covered. • We obtained IBA's IT policies and procedures on change management, user access management, and other IT operations and inspected for evidence of IBA's response. • We obtained an example change request over the IT environment and inspected for evidence that the changes were implemented as management intended, by an independent production individual, tested in the relevant environments and monitored appropriately. • We obtained an example new user access request and change access request and inspected for evidence of the relevant approvals as documented in the request ticket and that user access was provided or not, as appropriate. • We obtained an example user access termination request and inspected whether the user's access to the network, applications, operating systems and databases was disabled or revoked in a timely manner per internal policy. • We obtained the annual password review for ICE CoT related technologies within the relevant infrastructure

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	<p>All IBA and ICE employees are subject to strict confidentiality provisions in their contracts of employment and in various policies noted above. Employees within the broader ICE group are technologically segregated from the IBA business and employees.</p> <p>Confidentiality of data within IBA is protected through user access restrictions. IT controls restrict access and change to the systems holding data to IBA employees and those directly supporting IBA.</p> <p>When performing changes to the system, as laid out in the ICE Change Management Policy, there is a focus on reducing risk to production systems, including review and approval of all changes by the Change Advisory Board (CAB).</p> <p><i>Oversight committee members are subject to IBA's conflicts of interest policy and further conflicts requirements (as described in section 1.6 on the Oversight Function).</i></p>	<p>layers and inspected for evidence review of password requirements being met (unique user IDs, complexity, login controls and lifecycle management).</p> <ul style="list-style-type: none"> • We obtained an example user access review and inspected for evidence that the review was performed at the required frequency, reviewed by appropriate members of management and any required research and resolution was performed in the event of discrepancies. • We obtained an example of users with access to IBA systems and inspected the appropriateness of their access. • We obtained the ICE Change Management Policy and inspected for evidence that there is a focus on reducing risk to production systems when performing changes, including the review and approval of all changes by the CAB. • Please also refer to EY's response to section 1.6.
	<p>1.8 Objective - Transparency</p> <p><i>To ensure ICE CoT data requirements and methodologies are clear and publicly available. Key ICE CoT information, policies and procedures should be publicly available.</i></p> <p>Control Procedures:</p> <p>IBA publishes on its ICE CoT website:</p> <ul style="list-style-type: none"> • Input Data and Methodology Overview; • Grievance Procedure; • Complaints Policy for ICE CoT; • Fee Schedule for ICE CoT; • AOC Terms of Reference; • AOC composition and conflicts; • AOC public minutes; • Membership information; • Supported jurisdictions; • Platform availability; and • Third party service providers. <p>All documents and information are clearly identified. Policies and procedures are subject to internal review processes.</p>	<ul style="list-style-type: none"> • We inspected the ICE CoT website for evidence that the information, policies and procedures described in the ICE CoT Control Procedures are made publicly available. • We obtained the Terms of Reference for the AOC and inspected for evidence that policies and procedures are internally reviewed.

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	<p>1.9 Objective - Membership</p> <p><i>To provide a platform which is supported by a membership onboarding procedure that assesses which type of membership is appropriate for the entity. An internal ICE CoT membership committee will assess and monitor whether an entity is suitable to be accepted as, and remain, a member of ICE CoT.</i></p> <p>Control Procedures:</p> <p>All users of ICE CoT are subject to the Membership Process under the Usage Rules.</p> <p>ICE CoT offers three categories of user membership:</p> <ul style="list-style-type: none"> • Primary data uploaders; • Secondary data uploader; and • Clearing members. <p>Different membership categories come with the ability to grant different Permissions to Authorised Staff. The membership application process and requirements differ depending on the membership category. Applicants for all categories are required to complete an application form and identify any affiliates intending to use ICE CoT. Primary data uploaders must also provide corporate ownership and business integrity information and supporting documentation. All applicants will be subject to KYC/AML screening and must sign a Service Agreement.</p> <p>The ICE CoT membership committee reviews all applications and provides recommendations regarding all membership decisions (including ongoing reviews) in accordance with its Terms of Reference. An applicant or existing Member may appeal any decision of the Committee. ICE CoT Membership appeals are considered by IBA's Audit and Risk Committee (ARC) in accordance with IBA's established ICE CoT Membership Appeals Procedure.</p> <p>Members are required to comply with ICE CoT Member Conduct Requirements set out in the Usage Rules, including to:</p> <ul style="list-style-type: none"> • observe high standards of integrity and conduct; • act with due skill, care and diligence; • comply with the relevant Service Agreement and applicable laws; and • not to engage in, knowingly facilitate or fail to take reasonable steps to prevent any action or course of conduct that may be expected to be detrimental to the orderly operation of ICE CoT. 	<ul style="list-style-type: none"> • We obtained example membership onboarding forms for all three categories of user membership and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the ICE CoT Usage Rules and inspected for evidence of the Membership Process. • We obtained the User Access forms and inspected for evidence that the different membership categories are included as a field to complete. • We obtained the intragroup SLA with IFEU and inspected for evidence that the KYC/AML screening is outsourced to IFEU by IBA. • We obtained the Terms of Reference for the ICE CoT Membership Committee and inspected for evidence of the application review and recommendations for membership decisions process as described in the ICE CoT Control Procedures. • We obtained the ICE CoT Membership Appeals Procedure and inspected for evidence of the process as described in the ICE CoT Control Procedures. • We obtained the ICE CoT Usage Rules and inspected for evidence of the ICE CoT Member Conduct Requirements. • We performed a walkthrough of the ICE CoT Standard Operating Procedure, including the process for sharing of the User Access Forms with the ICE System Operations team for onboarding of new users. • We obtained the Terms of Reference for the AOC and inspected for evidence that the Membership Process, as part of the Usage Rules, is review by the AOC annually.

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	<p>Member infringements may incur sanctions including:</p> <ul style="list-style-type: none"> • issue a private warning; • issue an instruction to take remedial action; • issue a statement to all Members giving an outline of the circumstances surrounding the infringement, without stating the name of the Member; • issue a public warning stating the name of the Member and giving an outline of the circumstances surrounding the infringement; • inform a Competent Authority, the European Commission or any competent regulatory body with jurisdiction over the Member of the infringement; • recommend to IBA to suspend the Member's ICE CoT Membership for such period as is considered appropriate; • recommend to IBA to impose conditions on the Member's ICE CoT Membership; and/or • recommend to IBA to terminate the Member's ICE CoT Membership. <p>Once a membership application is made, the membership onboarding forms are shared with Operations which complete a user access form based on the onboarding forms, and share this with the ICE System Operations team to provide access to the relevant individuals at the company.</p> <p>The ICE CoT Membership Process is reviewed by the ICE CoT AOC annually.</p>	
	<p>1.10 Objective - Surveillance</p> <p><i>To provide a platform which is supported by Surveillance Procedures to monitor input data and user behaviour to help identify and investigate anomalies and suspicious activity.</i></p> <p>Control Procedures:</p> <p>IBA has a documented Surveillance Overview for ICE CoT outlining the Surveillance Principles. Using purpose-built tools, IBA will conduct surveillance in accordance with documented Surveillance Procedures to monitor input data and platform user behaviour in order to identify and investigate possible anomalies and suspicious activity on ICE CoT.</p> <p>Initially, analyst oversight will be used to identify behaviours of interest and highlight areas of risk. Once sufficient data becomes available, surveillance will also implement automated tests, identify data quality issues or errors and inconsistencies, and help to measure usage and performance. All alerts will be investigated and resolved.</p>	<ul style="list-style-type: none"> • We obtained the Surveillance Overview and Surveillance Procedures and inspected for evidence of the elements as described in the ICE CoT Control Procedures.

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	<p>Periodic surveillance reports will be made to the ICE CoT AOC.</p> <p>Further, once implemented, anomalies and suspicious activity identified by the Surveillance Procedures may be investigated and escalated, including to the ICE CoT AOC, using the Data Inspection and Verification Programme, and through the Grievance Procedure, as appropriate.</p>	
	<p>1.11 Objective - Platform Operations</p> <p><i>To ensure the operational integrity and reliability of ICE CoT and its associated data through appropriate and effective operational processes.</i></p> <p>Control Procedures:</p> <p>IBA’s measures to ensure the operational integrity and reliability of ICE CoT include IBA’s ICE CoT Standard Operating Procedure document, which outlines the procedures to be executed by IBA operations for the ICE CoT Platform, including:</p> <ul style="list-style-type: none"> • Daily checks; • Onboarding and account set-up; • Map and other reference data upload process; • Maintenance of test configurations; and • Incident reporting. <p>This is reviewed annually by IBA operations.</p> <p>Data integrity is maintained through completeness and data format checks performed on the input data in line with ICE CoT specifications before being accepted by IBA. Methodology tests and reviews are also applied to the data, including for reasonability and consistency, and parcels may only be registered with full data which has passed all reviews and tests.</p> <p>ICE CoT also has a documented deforestation map sign-off process and a documented lawful production annex and protected area map sign-off process.</p> <p><i>Please also see sections 1.18 and 1.19 on Information Security and Business Continuity and Disaster Recovery.</i></p>	<ul style="list-style-type: none"> • We obtained the ICE CoT Standard Operating Procedure and inspected for evidence that it covers the areas described in the ICE CoT Control Procedures. • We obtained the ICE CoT Standard Operating Procedure and inspected for evidence of the requirement for annual review by IBA operations. • We performed a walkthrough of the ICE CoT Standard Operating Procedure and related processes performed by IBA operations as described in the ICE CoT Control Procedures. • We obtained the Country Map Sign-Off Process and inspected for evidence that this captures the deforestation map, lawful production annex and protected area map sign-off processes. • Please also refer to EY’s response to sections 1.18 and 1.19.
	<p>1.12 Objective - Complaints</p> <p><i>To provide a platform which is supported by a complaints process with effective procedures for handling complaints about ICE CoT system operation. Complaints should be handled promptly and fairly.</i></p> <p>Control Procedures:</p>	<ul style="list-style-type: none"> • We inspected the ICE CoT website for evidence that the ICE CoT Complaints Policy is published. • We obtained the ICE CoT Complaints Policy and inspected for evidence of the elements as described in the ICE CoT Control Procedures.

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	<p>IBA has a written and published ICE CoT Complaints Policy under which complaints can be made regarding potential issues or concerns that may arise with ICE CoT system's operation, including;</p> <ul style="list-style-type: none"> • technical or operational issues; • platform user issues; • system access issues; and • reference data and methodologies. <p>Complaints may also be made regarding the outcome of any ICE CoT Grievance Procedure or Challenge Process.</p> <p>IBA will accept complaints made by any reasonable means. Factors that may be relevant in IBA's assessment of a complaint include all available evidence, the particular circumstances of the complaint, and similarities with other complaints received by IBA.</p> <p>IBA will:</p> <ul style="list-style-type: none"> • acknowledge the complaint within two business days; • Investigate the complaint carefully, diligently and impartially; • Decide whether the complaint is justified and, if justified, decide what remedial action is appropriate; and • Write to the complainant as soon as possible with a decision and explain clearly the assessment of the complaint, the decision on it and whether IBA proposes any remedial action. <p>If IBA cannot send a final response within eight weeks of receiving the complaint, IBA will write to explain why and advise when it expects to be able to complete the review and give a final response. If deciding to uphold a complaint, IBA will consider whether others who have not complained nevertheless may have had cause to complain. If IBA decides not to uphold the complaint, no further action will be taken. During IBA's review of the complaint, it may need to get further information and/or clarification.</p> <p>The Policy is reviewed by the AOC and approved by the IBA Board annually.</p>	<ul style="list-style-type: none"> • We obtained the Terms of Reference for the AOC and inspected for evidence of the annual review of the ICE CoT Complaints Policy.
	<p>1.13 Objective - Changes</p> <p><i>To ensure changes to ICE CoT specifications and methodologies are subject to appropriate and effective review, challenge and approval, and users are appropriately informed of such changes.</i></p> <p>Control Procedures:</p>	<ul style="list-style-type: none"> • We obtained the ICE CoT Changes Policy and inspected for the elements as described in the ICE CoT Control Procedures. • We obtained the Terms of Reference for the AOC and inspected for evidence of the responsibility to review specifications and methodologies annually.

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	<p>In accordance with the ICE CoT Changes Policy, IBA keeps the ICE CoT specifications and methodologies under review and updates these as required based on new developments.</p> <p>ICE CoT specifications and methodologies are also reviewed annually by the AOC.</p> <p>Changes to the documented ICE CoT specifications and methodologies which are referenced in the Usage Rules are notified to the AOC in accordance with the ICE CoT Changes Policy and to ICE CoT users in accordance with the Service Agreement.</p> <p>Changes which IBA considers are material in the context of EUDR compliance requirements, such as changes related to deforestation detection and lawful production assessment, and any changes to the public input data and methodology overview, are subject to review by the AOC and approval by the IBA Board.</p> <p>Changes may be subject to the published ICE CoT Consultation Policy, which is approved annually by the IBA Board.</p>	<ul style="list-style-type: none"> • We obtained the Service Agreement and inspected for evidence that users of ICE CoT are informed regarding any changes to the ICE CoT specifications and methodologies which are referenced in the Usage Rules. • We obtained the ICE CoT Consultation Policy and inspected for reference to changes being subject to the policy. • We obtained the minutes of meeting for the IBA Board and inspected for evidence that the Consultation Policy is approved annually by the IBA Board.
	<p>1.14 Objective - Operational Risk Management</p> <p><i>To have an appropriate and effective risk framework and related procedures to manage risks associated with the operation of ICE CoT.</i></p> <p>Control Procedures:</p> <p>IBA has implemented a risk management framework which provides the process for identifying, assessing, managing, monitoring and reporting risks. IBA's Chief Risk Officer (CRO) and the Enterprise Risk Management (ERM) team administer the risk management framework. The CRO reports to the IBA Audit & Risk Committee and to the ICE Inc. Corporate Risk Officer.</p> <p>IBA has adopted a three lines model for managing risks. The first line is the business lines and support functions managing day to day risks. Responsibility for the identification, notification, self-assessment and mitigation of risk rests with business areas and their support functions. The second line provides oversight of the risk framework. The third line is Audit Services and the company's external auditors providing independent assurance.</p> <p>IBA has a formally documented risk framework, risk appetite statement and risk metrics. The risk framework, risk appetite statement and risk metrics are approved by the IBA Board.</p>	<ul style="list-style-type: none"> • We obtained the IBA Governance Manual and inspected for evidence related to the CRO and ERM team as described in the ICE CoT Control Procedures. • We obtained the IBA Governance Manual and inspected for evidence of the three lines model for managing risks, as described in the ICE CoT Control Procedures. • We obtained the documented risk framework, risk appetite statement and risk metrics for IBA and inspected for evidence that these have been formally documented.. • We obtained the relevant minutes of meetings of the IBA Board of Directors and inspected for evidence of the approval of the risk framework, risk appetite statement and risk metrics.
	<p>1.15 Objective - Employee skills, knowledge and experience</p> <p><i>To ensure that IBA's operation of ICE CoT is carried out by competent employees who are adequately supervised, who are subject to conflicts of interest management provisions and who do not have outside interests that could compromise their actions.</i></p>	<ul style="list-style-type: none"> • We obtained the ICE Global Code of Business Conduct and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We performed a walkthrough of the HR process for IBA, including recruitment and pre-employment checks,

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	<p>Control Procedures:</p> <p>IBA’s measures to ensure the integrity and reliability of the employees include the following:</p> <ul style="list-style-type: none"> • the robustness of the recruitment process (including extensive interviews) and the pre-employment checks; • probationary period of employment which includes training on ICE CoT; • IBA employees are required to seek prior approval from their manager and ICE Global Corporate Compliance for outside activities related to part time work or serving on a board (ICE’s Global Code of Business Conduct); • supervision of employees; • performance management processes and annual performance appraisals; • remuneration is not linked to the test and review outcomes of ICE CoT; • documented operating procedures; and • IBA employees are not permitted to input data on behalf of users. <p>Employees are obliged to report a belief that someone is violating the Global Code of Business Conduct or policies, or otherwise acting in an illegal or unethical manner.</p> <p>Employees are subject to IBA and ICE policies regarding conflicts of interest and confidentiality (as described in section 1.7 on Conflicts of Interest Management).</p>	<p>probationary period, performance management and annual performance appraisals and remuneration, for evidence of the elements as described in the ICE CoT Control Procedures.</p> <ul style="list-style-type: none"> • We obtained the IBA Organisation Chart and inspected for evidence that the organisation is hierarchical with supervision of employees. • We obtained the Standard Operating Procedures and inspected that the operating procedures were documented. • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that IBA employees are not permitted to input data on behalf of users. • Please also refer to EY’s response to section 1.7.
	<p>1.16 Objective - External Audit</p> <p><i>To appoint an independent external assurance provider with appropriate experience and capability to review and report on the description and design effectiveness of the control procedures that relate to the ICE CoT platform.</i></p> <p>Control Procedures:</p> <p>IBA has appointed an independent external assurance provider with appropriate experience and capability to review and report on the description and design effectiveness of the control procedures that relate to the ICE CoT platform to (i) support operators and traders in their compliance with the specified EUDR requirements (including related to due diligence) and (ii) ensure adherence to the ICE CoT Methodologies.</p> <p>The AOC and IBA Audit and Risk Committee also review output from audits and monitor the implementation of any recommendations.</p>	<ul style="list-style-type: none"> • EY were appointed as the independent external assurance provider on 25 July 2025 to provide assurance over the description and design effectiveness of the control procedures that relate to the ICE CoT Platform to (i) support operators and traders in their compliance with the specified EUDR requirements (including related to due diligence) and (ii) ensure adherence to the ICE CoT Methodologies. • We obtained the AOC Terms of Reference and inspected for evidence that the AOC reviews output from audits and monitors the implementation of any recommendations. • We obtained the IBA Audit and Risk Committee Terms of Reference and inspected for evidence that the IBA Audit and Risk Committee reviews output from audits and monitor the implementation of any recommendations.
	<p>1.17 Objective - Services, Vendors and Outsourcing</p>	<ul style="list-style-type: none"> • We obtained the Master Service Agreement (MSA) between ICE Group and IBA, and inspected for evidence

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	<p><i>To have appropriate and effective arrangements for centralised services provided by the ICE Group and services provided by third party vendors, including robust onboarding and contracting processes.</i></p> <p>Control Procedures:</p> <p>IBA outsources some activities to other areas within the ICE Group of companies, including shared services such as human resources, finance, internal audit, enterprise risk management and technology, system and network support. IBA also outsources ICE CoT KYC processing to ICE Futures Europe. Intra-group agreements are in place for these services on arm’s length terms for which performance is monitored.</p> <p>IBA outsources certain ICE CoT activities to third parties including</p> <ul style="list-style-type: none"> • Deforestation map production and updates, and deforestation challenge processing to Space Intelligence; • Farm methodology and software design and updates, and challenge processing to Meridia; • Protected area map data provision to the IBAT Alliance, with additional review and layers provision to Meridia; • Lawful production methodology design and updates, and country legal lists to KPMG Netherlands; and • Third party audit and inspection framework design and implementation services to FLOCERT. <p>Contractual agreements are in place for these services.</p> <p>The ICE Third-Party Risk Management (TPRM) Framework establishes a comprehensive and structured approach for onboarding, assessing, managing, monitoring and governance of third-party risks at ICE and subsidiaries such as IBA.</p> <p>This framework outlines the methodology and requirements that support adherence to the TPRM Policy.</p> <p>Monitoring</p> <p>IBA has KPIs in place for the deforestation maps. IBA Operations review the KPIs and at their discretion raise any breaches with IBA Senior Management. IBA Operations also monitor third parties and anything material is also presented to Senior Management. Senior Management will use their discretion to then escalate further using the Escalation Policy or to the ICE CoT AOC or the IBA Audit and Risk Committee where necessary.</p>	<p>that IBA outsources some activities including shared services to other areas of the ICE Group.</p> <ul style="list-style-type: none"> • We obtained the intra-group agreement between IFEU and IBA and inspected for evidence that IFEU conducts the ICE CoT KYC processing. • We obtained the contractual agreements between IBA and the third parties outsourced to for ICE CoT, and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the ICE Third-Party Risk Management (TPRM) Framework and Policy and inspected for evidence that it establishes an approach for onboarding, assessing, managing, monitoring and governance of third-party risks at ICE and subsidiaries such as IBA. • We obtained the ICE TPRM Policy and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We performed a walkthrough of the outsourcing for evidence that there are KPIs in place and that these are on the deforestation maps. • We obtained the Standard Operating Procedures and inspected for evidence of IBA Operations KPI review and monitoring of third parties, and relevant escalation where necessary.

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	<p>1.18 Objective - Information Security</p> <p><i>To have appropriate and effective information and data security procedures associated with the operation of ICE CoT.</i></p> <p>Control Procedures:</p> <p>ICE Group Governance Risk and Compliance (GRC) oversees the Information Security management, including Cybersecurity at ICE Group, including its subsidiaries such as IBA.</p> <p>ICE Group documents the procedures and processes related to Cybersecurity in the Group Corporate Information Security Policy.</p> <p>ICE maintains a testing programme to validate the effectiveness of the controls around Cybersecurity which includes those systems and applications in scope for IBA's ICE CoT provisioning process.</p> <p>Access to ICE CoT is managed through the authorisation and permissioning process set out in the Usage Rules and the Approved Interface Guidelines. Login credentials and permissions are issued as per appropriate requests to each member of Authorised Staff (including through an API connection).</p> <p>Details of information sharing are set out in the Usage Rules and the ICE CoT Data Sharing Specification.</p> <p><i>Please also see section 1.19 on Business Continuity and Disaster Recovery.</i></p>	<ul style="list-style-type: none"> • We obtained ICE Group Corporate Information Security Policy and inspected for evidence of procedures and processes related to Cybersecurity. • We obtained the Usage Rules and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained management's confirmation of the ICE testing programme maintained to validate the effectiveness of controls around Cybersecurity which includes systems and applications in scope for the ICE CoT provisioning process. • We obtained the Approved Interface Guidelines and inspected for evidence of the access login credentials and permissions. • We obtained the ICE CoT Data Sharing Specification and inspected for evidence that the details of information sharing are set out. • Please also refer to EY's response to section 1.19.
	<p>1.19 Objective - Business Continuity and Disaster Recovery</p> <p><i>To provide a platform which is supported by adequate and effective business continuity and disaster recovery plans and processes. Contingency procedures are in place in the event of a disruption to the provision of ICE CoT.</i></p> <p>Control Procedures:</p> <p>ICE CoT is included in IBA's Business Continuity and Disaster Recovery Policy and the related testing schedule. The policy and test results are reviewed annually by the IBA Audit and Risk Committee. ICE CoT is also included in the IBA Business Impact Analysis (BIA) which covers Recovery Time Objectives, resources, locations and other contingency procedures.</p>	<ul style="list-style-type: none"> • We obtained the IBA Business Continuity and Disaster Recovery Policy and inspected for evidence that it includes ICE CoT. • We obtained the IBA Governance Manual and inspected for evidence of annual review by the IBA Audit and Risk Committee of the Business Continuity and Disaster Recovery Policy and test results. • We obtained the IBA Business Impact Analysis (BIA) and inspected for evidence that ICE CoT is included in the BIA.
<p>Article 4 (Obligations of Operators)</p>		

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<p><u>Article 4(1)</u></p> <p>“Operators shall exercise due diligence in accordance with Article 8 prior to placing relevant products on the market or exporting them in order to prove that the relevant products comply with Article 3.”</p>	<p>Please see the responses to Article 3 and Articles 8 to 11 on Due Diligence.</p>	<p>Please see EY response to Article 3 and Articles 8 to 11.</p>
<p><u>Article 4(2)</u></p> <p>“Operators shall not place relevant products on the market or export them without prior submission of a due diligence statement. Operators who, on the basis of the due diligence exercised in accordance with Article 8, conclude that the relevant products comply with Article 3 shall, before placing the relevant products on the market or exporting them, make available a due diligence statement to the competent authorities through the information system referred to in Article 33. Such electronically available and transmittable due diligence statement shall contain the information set out in Annex II for the relevant products and a declaration by the operator that the operator exercised due diligence and that no or only a negligible risk was found.”</p>	<p>2.1 Objective – DDS</p> <p>To provide a platform which allows users to submit due diligence statements to the EU information system in respect of parcels of relevant commodities and relevant products that shall contain the information set out in Annex II and a declaration by the operator that the operator exercised due diligence and that no or only a negligible risk of non-compliance was found.</p> <p>Control Procedures:</p> <p>Due Diligence Statements</p> <p>Please see the response to Article 3(c).</p> <p>Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols</p> <p>Please see the responses to Article 3 and Articles 8 to 11 on Due Diligence.</p> <p>Usage Rules</p> <p>The Usage Rules outline that by using ICE CoT to submit a DDS, a user agrees that its submission deemed to include the wording per paragraph 5 of Annex II, and agrees that it is deemed to have signed the submission of the DDS to the EU IS in the format of paragraph 5 of Annex II.</p>	<ul style="list-style-type: none"> • Please also refer to EY response to Article 3(c). • Please also refer to EY responses to Articles 3 and Article 8 to 11. • We obtained the Usage Rules and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that the wording of paragraph 5 of Annex II is agreed to by the user when submitting a DDS through the platform.
<p><u>Article 4(3)</u></p> <p>“By making available the due diligence statement or, in the case of micro and small primary operators, by submitting the simplified declaration referred to in Article 4a, the operator shall assume responsibility for the compliance of the relevant product with Article 3. Operators shall keep a record of the due diligence statements for five years from the date the statement is submitted through the information system referred to in Article 33.”</p>	<p>2.2 Objective – Record Keeping</p> <p>To provide a platform which allows users to keep a record of all due diligence statements for a parcel submitted through ICE CoT to the EU IS for at least five years from the date when the statement is submitted through EU IS. As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.</p> <p>Control procedures:</p> <p>ICE CoT Record Retention</p>	<ul style="list-style-type: none"> • Please refer to EY response to section 10.3. • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that a DDS can be made available to NCAs by operators via the EUIS through the ICE CoT Platform. • We obtained the Usage Rules and inspected for evidence that neither IBA nor ICE CoT submits DDS’ as operators, or for or on behalf of operators as an Authorised Representative.

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	<p><i>Please see section 10.3 regarding ICE CoT record keeping processes, including regarding DDS information.</i></p> <p>A DDS can be made available to NCAs via the EU IS by users that are operators through the ICE CoT platform.</p> <p>Neither IBA nor ICE CoT submits DDS’ as operators, or for, or on behalf of, operators as an Authorised Representative. Accordingly, operator users retain responsibility for the compliance of the relevant commodities and products under the DDS.</p>	
<p><u>Article 4(4)</u></p> <p><i>“Operators shall not place relevant products on the market or export them where one or more of the following cases apply:</i></p> <p><i>(a) the relevant products are non-compliant;</i></p> <p><i>(b) the exercise of due diligence has revealed a non-negligible risk that the relevant products are non-compliant;</i></p> <p><i>(c) the operator was unable to fulfil the obligations referred to in paragraphs 1 and 2.”</i></p>	<p>2.3 Objective – Non-Compliant Products</p> <p><i>To provide a platform which supports users with their EUDR compliance obligations, in particular regarding demonstrating and assessing that uploaded parcels of relevant commodities and relevant products are ‘deforestation-free’ and ‘have been produced in accordance with the relevant legislation of the country of production’ (each as defined in the EUDR), and to submit DDS to the EUIS in respect of parcels of relevant commodities and relevant products that have all required ICE CoT data and have satisfied all ICE CoT methodology requirements.</i></p> <p>Control procedures:</p> <p>ICE CoT will not register parcels or allow DDS creation with incomplete input data or Disclosure Statement responses, or data that does not satisfy any of the methodology tests or Disclosure Statement Review Protocols.</p> <p>ICE CoT can take action to suspend parcels for which new information indicates a risk of non-compliance in accordance with the Grievance Procedure.</p> <p>Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols</p> <p><i>Please refer to Article 3 and Articles 8 to 11 on Due Diligence.</i></p> <p>Third Party Desk and Field-Based Inspection Programme</p> <p><i>Please see section 1.4 on Third Party Desk and Field-Based Inspection Programme regarding audits to support and check the truthfulness, accuracy and completeness of the Disclosure Statement Responses.</i></p> <p>Control Framework</p> <p><i>Please see the section 1.5 on the Control Framework.</i></p> <p>Grievance Procedure</p> <p><i>Please see section 13.1 on Grievance.</i></p>	<ul style="list-style-type: none"> • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that parcel registration and DDS creation cannot be performed with incomplete input data, disclosure statement responses or data that does not satisfy the methodology tests. • We obtained the Grievance Procedure and inspected for evidence that ICE CoT can suspend parcels at risk of non-compliance. • Please also refer to EY’s response to Article 3, Articles 8 – 11, section 1.4, section 1.5 and section 13.1.

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p><u>Article 4(5)</u></p> <p>“Operators that obtain or are made aware of relevant new information, including substantiated concerns, indicating that a relevant product that they have placed on the market is at risk of not complying with this Regulation shall immediately inform the competent authorities of the Member States in which they placed the relevant product on the market, as well as downstream operator and traders to whom they supplied the relevant product. In the case of exports, the operators shall inform the competent authority of the Member State which is the country of production.”</p>	<p>2.4 Objective – Non-Compliance Information and Substantiated Concerns</p> <p><i>To provide a platform which can identify relevant information indicating that a parcel is at risk of not complying the ICE CoT requirements or EUDR, to require users to report such information, including substantiated concerns, and to allow third parties to report such information. The platform should allow such information to be shared as necessary along the supply chain and with NCAs.</i></p> <p>Control procedures:</p> <p>Service Agreement</p> <p>Users are required under the Service Agreement to submit true, accurate, complete and current data, keep the submitted data true, accurate, complete and current, and to notify IBA promptly of any information, errors or other circumstances which render any Parcel data no longer true, accurate, complete and current. Users are bound by the Service Agreement to the Usage Rules as IBA only permits Client Parties to access and use ICE CoT subject to compliance with all rules and requirements in the Usage Rules.</p> <p>Usage Rules</p> <p>Client Parties are required under the Usage Rules to use the Grievance Procedure to notify IBA of any information indicating that any commodities or products registered on ICE CoT, or a user of ICE CoT, is at risk of not complying with either any applicable ICE CoT requirements or any applicable EUDR requirements. This includes providing IBA with information regarding any EUDR notifications made or received related to potential non-compliance, including any ‘substantiated concern’, and any action taken by Member States or NCAs. Users are required to inform IBA both of prospective and retrospective information, notifications and substantiated concerns which are relevant to the compliance by any commodities or products registered on ICE CoT, or a user of ICE CoT, with any applicable ICE CoT or EUDR requirement.</p> <p>Grievance Procedure</p> <p><i>Please refer to Article 31.</i></p> <p>In addition, IBA performs media tracking and assesses risk changes for different countries. Any data where new risks are identified for users of ICE CoT or commodities or product on ICE CoT will be reviewed and escalated promptly to management. If information arises which indicates that the commodities or product on ICE CoT, or a user of ICE CoT, are at risk of not complying with either applicable ICE CoT requirements or EUDR requirements, this will result in a Grievance procedure initiation.</p> <p>Notifications</p>	<ul style="list-style-type: none"> • We obtained the Service Agreement and inspected for evidence that users are required to submit true, accurate, complete and current data, keep the submitted data true, accurate, complete and current, and to notify IBA promptly of any information, errors or other circumstances which render any Parcel data no longer true, accurate, complete and current. • We obtained the Service Agreement and inspected for evidence that users are only permitted to use ICE CoT subject to compliance with all rules and requirements in the Usage Rules. • We obtained the Usage Rules and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • Please also refer to EY’s response to Article 31. • We obtained the Risk Assessment Dashboard Review Process document, and inspected it for evidence of media tracking, risk changes and escalation of risks as described in the ICE CoT Control Procedures. • We obtained the ICE CoT Grievance Procedure and inspected for evidence that a possible outcome is a requirement for users to notify other supply chain actors or NCAs regarding risks of non-compliance, or for ICE CoT itself to do this.

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
	<p>Grievance Procedure outcomes may include a requirement for a user to notify other supply chain actors or NCAs regarding risks of non-compliance, or for ICE CoT itself to do this (including to notify NCAs regarding a substantiated concern).</p> <p>ICE CoT has contact details of all supply chain actor users of ICE CoT in order to make required notifications.</p>	
<p><u>Article 4(6)</u></p> <p>“Operators shall offer all necessary assistance to the competent authorities to facilitate the carrying out of the checks under Article 18, including access to premises and the making available of documentation and records.”</p>	<p>2.5 Objective – Record Keeping</p> <p><i>To provide a platform that benefits from transparent data specifications and methodologies, and with data and information that can be made available to NCAs.</i></p> <p>Control procedures:</p> <p>User Record Keeping</p> <p>Users are required under the Service Agreement and Usage Rules to maintain audit records confirming uploaded data is true, accurate, complete and current, which is available to IBA and NCAs on request.</p> <p><i>Please also see section 10.2 on User Record Keeping.</i></p> <p>Third-Party Field Audit</p> <p>Any evidence that is collated and/or created from the third-party field audits conducted by FLOCERT may be shared by IBA to NCAs upon request.</p> <p><i>Please also see section 1.4 on Third Party Desk and Field-Based Inspection Programme.</i></p> <p>ICE CoT Record Retention</p> <p>IBA has record retention arrangements under a documented record retention schedule for ICE CoT.</p> <p>ICE CoT will maintain all ICE CoT data specifications and methodologies and all commodity data and results data for an indefinite period (and in any event at least five years).</p> <p>All data on ICE CoT and all detailed ICE CoT data specifications and methodologies are available to NCAs to review on request.</p> <p><i>Please also see section 10.3 on ICE CoT Record Retention.</i></p> <p>Transparency</p> <p><i>Please also see section 1.8 on Transparency . In particular, IBA publishes on its ICE CoT website the ICE CoT Input Data Specification and Methodology Overview.</i></p>	<ul style="list-style-type: none"> • We obtained the Service Agreement and inspected for evidence that users are required to maintain audit records confirming uploaded data is true, complete and current, and available to IBA and NCAs on request. • We obtained Usage Rules and inspected for evidence that users are required to maintain audit records confirming uploaded data is true, complete and current, and available to IBA and NCAs on request. • Please also refer to EY’s response to section 10.2. • Please also refer to EY’s response to section 1.4. • We obtained the record retention schedule for ICE CoT and inspected for evidence of the retention periods described. • We obtained the daily and weekly backups of IBA systems/drives and inspected for evidence that ICE CoT platform data will be retained for an indefinite period. • We obtained management’s confirmation of the systems/drives where the records as described in ICE CoT Control Procedures are retained. • Please also refer to EY’s response to section 10.3 • Please also refer to EY’s response to section 1.8.

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p><u>Article 4(7)</u> “Operators shall communicate to downstream operators and to traders further down the supply chain of the relevant products they placed on the market or exported the reference numbers of the due diligence statements or if applicable, the declaration identifiers associated to those products.”</p>	<p>2.6 Objective – Passing of DDS and other due diligence information from one user to another</p> <p><i>To provide a platform which allows users (traders and operators) to share and view information and data (including DDS reference numbers and validation keys) regarding parcels to support users in demonstrating (and assessing) whether the required due diligence was exercised and whether the parcel is ‘deforestation-free’ and ‘produced in accordance with the relevant legislation of the country of production’ (each as defined in the EUDR). As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.</i></p> <p><i>ICE CoT requires the same information and places the same requirements on all users (whether operators or traders). Further, transfers for all users (whether operators or traders) in ICE CoT also operate in the same way.</i></p> <p>Control procedures:</p> <p>Usage Rules</p> <p>ICE CoT data specifications and methodologies, and necessary input data and results, are available to users to support them in demonstrating (and assessing) that due diligence has been exercised as part of the user’s assessment that a parcel is compliant with EUDR requirements.</p> <p>Only eligible parcels with complete input data which satisfies all ICE CoT review and methodology requirements can be registered on ICE CoT, benefit from an ICE CoT ‘Badge’ and be transferred on the platform.</p> <p>Uploaded data remains associated with the parcel and is supplemented as it moves along the supply chain and is transported, stored or processed.</p> <p>Where a Client Party holds a Parcel on ICE CoT and an obligation arises under EUDR for the Client Party to submit a DDS in respect of the commodities or products that the Parcel relate to, the Client Party must submit the DDS to the EUDR Information System (part of the EC ‘TRACES’ platform) through the ICE CoT platform and not directly through the EUDR Information System or through any other system or platform. The Client Party must use its own EUDR Information System login information and credentials through ICE COT for these purposes.</p> <p>The client party must subsequently only ever deal with or manage the relevant DDS or the products or commodities associated with that DDS using ICE CoT and not directly through the EUDR Information System or through any other system or platform.</p> <p>A Client Party may not extract or download any data from ICE CoT other than through an Approved Interface and may not extract or download any data from ICE CoT to create and submit a DDS to the EUDR Information System except through the ICE</p>	<ul style="list-style-type: none"> • We performed a walkthrough of the ICE CoT Platform and inspected that only eligible parcels with complete input data which satisfies all ICE CoT review and methodology requirements can be registered on ICE CoT, benefit from an ICE CoT ‘Badge’ and be transferred on the platform. • We obtained the Usage Rules and inspected for evidence of the DDS creation process from the ICE CoT Platform to EUIS as described in the ICE CoT Control Procedures. • We obtained the ICE CoT Data Sharing Specification and inspected for evidence of the elements as described in the ICE CoT Control Procedures.

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
	<p>CoT platform process and using ICE CoT Permissions as described above. A Client Party may not extract or download any data from ICE CoT for any purpose except as expressly permitted by the ICE CoT platform or the Service Agreement.</p> <p>The ICE CoT Data Sharing Specification sets out the exact data that is shared along the supply chain on a transfer of a parcel to support users in this demonstration (and assessment), including the data required to generate a DDS and the reference numbers of DDS associated with the parcel.</p>	
<u>Article 4a (Simplified regime for micro and small primary operator)</u>		
Article 4a(1),(2),(3),(4) and (5)	As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.	No matters to report on.
<u>Article 5 (Obligations of downstream operators and traders)</u>		
<p><u>Article 5(1)</u></p> <p><i>“Downstream operators and traders shall place or make available on the market or export relevant products only if they are in possession of the information required under paragraph 3.”</i></p>	<p>ICE CoT requires the same information and places the same requirements on operators and traders.</p> <p>3.1 Objective – Possession of Information</p> <p><i>The platform should include input data specifications to support users in collecting and storing the required data for any ICE CoT eligible parcel.</i></p> <p>Control procedures:</p> <p>ICE CoT will not register parcels or allow DDS creation/submission with incomplete input data or data that does not satisfy any review protocol or methodology tests.</p> <p><i>Please see response to Article 5(3) below.</i></p>	<ul style="list-style-type: none"> • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that parcel registration and DDS submission cannot occur if the input data is incomplete or the data does not satisfy review protocol or methodology tests. • Please refer to EY’s response to Article 5(3).
<p><u>Article 5(2)</u></p> <p><i>“Downstream operators that are not SMEs (‘non-SME downstream operators’) and traders that are not SMEs (‘non-SME traders’) shall register in the information system referred to in Article 33 prior to placing or making available on the market or exporting relevant products.”</i></p>	As set out in the Usage Rules, ICE CoT users that are ‘non-SME downstream operators’ and ‘non-SME traders’ are responsible for their own registration in the EUIS prior to placing or making available relevant products on the market or exporting them.	<ul style="list-style-type: none"> • We obtained the ICE CoT Usage Rules and inspected for evidence that ICE CoT users that are ‘non-SME downstream operators’ and ‘non-SME traders’ are responsible for their own registration in the EU IS prior to placing or making available relevant products on the market or exporting them.
<p><u>Article 5(3)</u></p> <p><i>“Downstream operators and traders shall collect and keep the following information</i></p>	ICE CoT requires the same information and places the same requirements on operators and traders, including the registered trade name or registered trade mark.	<ul style="list-style-type: none"> • We obtained the membership onboarding forms and inspected for evidence that they include the information required under Article 5(3).

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p><i>relating to the relevant products they intend to place or make available on the market or export:</i></p> <p><i>(a) the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the operators, downstream operators, or the traders who have supplied the relevant products to them, as well as, only in the event that their supplier is an operator, the reference numbers of the due diligence statements or the declaration identifiers associated to those products;</i></p> <p><i>(b) the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the downstream operators, or the traders to whom they have supplied the relevant products.”</i></p>	<p>As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.</p> <p>3.2 Objective – Downstream Operator and Trader Information</p> <p><i>The platform should include data specifications to support users in collecting and storing the required data for any ICE CoT eligible parcel.</i></p> <p>Control procedures:</p> <p>The ICE CoT onboarding and input data specifications include information required under Article 5(3).</p> <p>ICE CoT will maintain all onboarding and commodity data for an indefinite period (and in any event at least five years).</p> <p><i>Please see section 10.3 on ICE CoT Record Retention.</i></p>	<ul style="list-style-type: none"> • We obtained the input data specifications and inspected for evidence that they include the information required under Article 5(3). • We obtained the record retention schedule and inspected for evidence that all onboarding and commodity data will be maintained for an indefinite period. • Please refer to EY’s response to section 10.3.
<p><u>Article 5(4)</u></p> <p><i>“Downstream operators and traders shall keep the information referred to in paragraph 3 for at least five years from the date of the placing or making available on the market or export, and shall provide that information to the competent authorities upon request.”</i></p>	<p>ICE CoT requires the same information and places the same requirements on operators and traders, including the requirement for data stored in ICE CoT to be kept indefinitely (and in any event at least five years).</p> <p>3.3 Objective – Record keeping</p> <p><i>The platform should support users in collecting and storing the required data for any eligible parcel for 5 years after DDS submission, with such data available to NCAs.</i></p> <p>Control procedures:</p> <p>IBA has record retention arrangements under a documented record retention schedule for ICE CoT. This includes keeping commodity input data for an indefinite period (and in any event for at least 5 years after DDS submission).</p> <p>All data on ICE CoT is available to NCAs for review on request.</p> <p><i>Please see section 10.3 on ICE CoT Record Retention.</i></p>	<ul style="list-style-type: none"> • We obtained the record retention schedule and inspected for evidence that commodity input data is kept for an indefinite period. • We obtained the daily and weekly backups of IBA systems/drives and inspected for evidence that ICE CoT platform data will be retained for an indefinite period. • We obtained management’s confirmation of the systems/drives where the records as described in ICE CoT Control Procedures are retained. • Please refer to EY’s response to section 10.3.
<p><u>Article 5(5)</u></p> <p><i>“Downstream operators and traders that obtain or are made aware of relevant new information, including substantiated concerns, indicating</i></p>	<p><i>ICE CoT requires the same information and places the same requirements on operators and traders.</i></p> <p><i>Please see response to Article 4(5).</i></p>	<p>Please refer to EY’s response to Article 4(5).</p>

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p><i>that a relevant product that they have placed or made available on the market is at risk of not complying with this Regulation shall immediately inform the competent authorities of the Member States in which they placed or made the relevant product available on the market as well as downstream operators and traders to whom they supplied the relevant product. In the case of exports, downstream operators shall inform the competent authority of the Member State which is the country of production.”</i></p>		
<p><u>Article 5(6)</u> <i>“If non-SME downstream operators and non-SME traders obtain or are made aware of relevant information, indicating that a relevant product is not in compliance with the requirements set out in this Regulation, prior to placing or making available on the market or exporting, they shall immediately inform the competent authorities of the Member States in which they intend to place or make available on the market or from which they intend to export the relevant product. In the case of substantiated concerns, they shall verify that due diligence was exercised and no or only a negligible risk was found. They shall not place or make available on the market or export relevant products unless the verification demonstrates no or only a negligible risk of non-compliance.”</i></p>	<p><i>ICE CoT requires the same information and places the same requirements on operators and traders.</i></p> <p><i>Please see response to Article 4(5) on non-compliance information and substantiated concerns, and 4(7) on the passing of DDS and other due diligence information from one user to another.</i></p> <p><i>Please also see the sections regarding Article 3 and Articles 8 to 11 on due diligence and on Article 4(1) and 4(4) on exercising due diligence and non-compliant products.</i></p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 4(5) and 4(7). • Please refer to EY’s response to Article 3, Articles 8 to 11, Article 4(1) and 4(4).
<p><u>Article 5(7)</u> <i>“Downstream operators and traders shall offer all necessary assistance to the competent authorities to facilitate the carrying out of the checks under Article 19, including access to premises and the making available of documentation and records.”</i></p>	<p><i>ICE CoT requires the same information and places the same requirements on operators and traders.</i></p> <p><i>Please see response to Article 4(6).</i></p>	<p>Please refer to EY’s response to Article 4(6).</p>
<p>Article 6 (Authorised Representatives)</p>		

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p><u>Article 6(1)</u></p> <p>“Operators may mandate an authorised representative to submit the due diligence statement pursuant to Article 4(2) on their behalf. In such cases, the operator shall retain responsibility for the compliance of the relevant product with Article 3.”</p>	<p>4.1 Objective – Authorised Representatives</p> <p><i>The platform should support Authorised Representatives in uploading the required data and creating DDS.</i></p> <p>Control procedures:</p> <p>ICE CoT permits a user to designate an Authorised Agent under the Service Agreement. Users are able to permission staff of an Authorised Agent which is an Authorised Representative to upload data and submit DDS on its behalf in accordance with the Usage Rules.</p> <p>Access controls exist in ICE CoT to ensure it is restricted to Authorised Staff of the user. If the user requires access to be provided to an Authorised Agent, application through its membership process is required prior to any grant of access.</p> <p>ICE CoT will require a copy of the mandate and confirmation that any required translation is made available to an NCA in accordance with the Usage Rules.</p> <p>Neither IBA nor ICE CoT submit DDS’ as the operators, or for, or on behalf of, operators as an Authorised Representative.</p>	<ul style="list-style-type: none"> • We obtained the Service Agreement and inspected for evidence that Authorised Representatives can act as an “Authorised Agent” under the agreement, in accordance with the Usage Rules. • We obtained the onboarding forms for new members of ICE CoT and inspected for evidence of requiring a copy of the mandate and translation if necessary. • We obtained the Usage Rules and inspected for evidence that neither IBA nor ICE CoT will submit DDS’ as the operators, or for, or on behalf of, operators as an Authorised Representative.
<p><u>Article 6(2)</u></p> <p>“The authorised representative shall, upon request, provide a copy of the mandate in an official language of the Union to the competent authorities and a copy in an official language of the Member State in which the due diligence statement or simplified declaration is handled or, where that is not possible, in English.”</p>	<p><i>Please see response to Article 6(1).</i></p> <p>As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.</p>	<p>Please refer to EY’s response to Article 6(1).</p>
<p><u>Article 6(3)</u></p> <p>“An operator that is a natural person or a microenterprise may mandate the next downstream operator or trader further down the supply chain that is not a natural person or a microenterprise to act as an authorised representative. Such next downstream operator or trader further down the supply chain shall not place or make available relevant products on the market or export them without submitting the due diligence statement pursuant to Article 4(2) on behalf of that operator or, in the case of</p>	<p><i>Please see response to Article 6(1).</i></p> <p>As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.</p>	<p>Please refer to EY’s response to Article 6(1).</p>

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures	
<p><i>a micro and small primary operator, without submitting a simplified declaration on behalf of the micro and small primary operator in the information system referred to in Article 33. In such cases, the operator that is a natural person or a microenterprise shall retain responsibility for compliance of the relevant product with Article 3”</i></p>			
<p>Article 7 (Placing on the market by operators established in third countries)</p>			
<p><u>Article 7</u> <i>“Where a natural or legal person established outside the Union places relevant products on the market, the first natural or legal person established in the Union who makes such relevant products available on the market shall be deemed to be an operator within the meaning of this Regulation.”</i></p>	<p>Noted. ICE CoT requires the same information and places the same requirements on operators and traders.</p>	<p>No matters to report on.</p>	
<p>Article 8 (Due diligence)</p>			
<p><u>Article 8(1)</u> <i>“Prior to placing relevant products on the market or exporting them, operators shall exercise due diligence with regard to all relevant products.”</i></p>	<p>5.1 Objective – Due Diligence <i>To provide a platform which supports users in demonstrating and assessing the exercise of the required due diligence under EUDR.</i> Control procedures: <i>Please see response to Articles 9, 10 and 11</i></p>	<p>Please refer to EY’s response to Articles 9, 10 and 11.</p>	
<p><u>Article 8(2)</u> <i>“The due diligence shall include: [...]”</i></p>	<p><i>“(a) the collection of information, data and documents needed to fulfil the requirements set out in Article 9;”</i></p>	<p><i>Please see response to Article 9.</i></p>	<p>Please refer to EY’s response to Articles 9.</p>
	<p><i>“(b) risk assessment measures as referred to in Article 10;”</i></p>	<p><i>Please see response to Article 10.</i></p>	<p>Please refer to EY’s response to Articles 10.</p>

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
	“(c) risk mitigation measures as referred to in Article 11.”	Please see response to Article 11.
Article 9 (Information requirements)		
<p><u>Article 9(1)</u> “Operators shall collect information, documents and data which demonstrate that the relevant products comply with Article 3. For this purpose, the operator shall collect, organise and keep for five years from the date of the placing on the market or of the export of the relevant products the following information, accompanied by evidence, relating to each relevant product: [...]”</p>	<p>6.1 Objective – Data Collection <i>To support users in demonstrating and assessing the collection, organization and maintenance of the required information, documents which demonstrate relevant products comply with Article 3, accompanied by evidence.</i></p> <p>Control Procedures: Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols ICE CoT benefits from comprehensive input data specifications and disclosure statements and checks for data completeness prior to registering any parcel. <i>Please see below for details regarding the information specified in Article 9. Please also see the response to Article 3 regarding Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols.</i></p> <p>ICE CoT Record Retention IBA has record retention arrangements under a documented record retention schedule for ICE CoT. ICE CoT will maintain all ICE CoT commodity data for an indefinite period (and in any event for at least five years). <i>Please see response to section 10.3 on ICE CoT Record Retention.</i></p> <p>ICE CoT Data Sharing Specification The ICE CoT Data Sharing Specification sets out the exact data that is shared along the supply chain on a transfer of a parcel to support users in demonstrating and assessing the required information collection, including the data required to generate a DDS, and the reference numbers and validation keys of DDS associated with the parcel. Only parcels with all required input data that has satisfied all ICE CoT review and methodology tests may be registered on ICE CoT and benefit from the Badge.</p> <p>User Record Keeping <i>Please see section 10.2 on User Record Keeping regarding requirements on users to keep records and evidence related to the data they have submitted to ICE CoT and providing or procuring access to IBA’s auditors.</i></p>	<ul style="list-style-type: none"> • We performed a walkthrough of the ICE CoT Platform, and observed the controls in place for Article 9(1)(a – h) as described in the ICE CoT Control Procedures. • Please refer to EY’s response to Article 9 elements below. • Please refer to EY’s response to Article 3. • Please refer to EY’s response to section 10.3. • We obtained the ICE CoT Data Sharing Specification and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • Please see EY’s response to Article 12(5).

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p>“(a) a description, including the trade name and type of the relevant products as well as, in the case of relevant products that contain or have been made using wood, the common name of the species and their full scientific name; the product description shall include the list of relevant commodities or relevant products contained therein or used to make those products;”</p>	<p>These details are required to be uploaded with a parcel (HSCode, Product Type and an optional Product Description).</p> <p><i>Please see the ICE CoT Physical Flow Traceability Data Input Specification and Physical Flow Traceability Data Validation Methodology.</i></p>	<p>Please refer to EY’s response to Article 9(1).</p>
<p>“(b) the quantity of the relevant products; for relevant products entering or leaving the market, the quantity is to be expressed in kilograms of net mass and, where applicable, in the supplementary unit set out in Annex I to Council Regulation (EEC) No 2658/87* against the indicated Harmonised System code, or, in all other cases, the quantity is to be expressed in net mass or, where applicable, volume or number of items; a supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonised System code referred to in the due diligence statement or where provided as part of the simplified declaration,”</p> <p>* Council Regulation (EEC) No 2658/87 of 23 July 1987 on the tariff and statistical nomenclature and on the Common Customs Tariff (OJ L 256, 7.9.1987, p. 1, ELI: http://data.europa.eu/eli/reg/1987/2658/oj.)’</p>	<p>These details are required to be uploaded with a parcel (NetWeight).</p> <p><i>Please see the ICE CoT Physical Flow Traceability Data Input Specification and Physical Flow Traceability Data Validation Methodology.</i></p> <p>As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.</p>	<p>Please refer to EY’s response to Article 9(1).</p>
<p>“(c) the country of production and, where relevant, parts thereof;”</p>	<p>Details of the country of production are recorded with the production farm plots (Producer Country) associated with a parcel.</p> <p><i>Please see the ICE CoT Physical Flow Traceability Data Input Specification and Physical Flow Traceability Data Validation Methodology.</i></p> <p><i>Please see the ICE CoT Farm Plot Data Input Specification and Farm Plot Data Validation Methodology.</i></p> <p><i>Please see the ICE CoT Lawful Production and Compliance Risk Disclosure Statement and Review Protocol.</i></p>	<p>Please refer to EY’s response to Article 9(1).</p>

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<p>“(d) the geolocation of all plots of land where the relevant commodities that the relevant product contains, or has been made using, were produced, as well as the date or time range of production; where a relevant product contains or has been made with relevant commodities produced on different plots of land, the geolocation of all different plots of land shall be included; any deforestation or forest degradation on the given plots of land shall automatically disqualify all relevant commodities and relevant products from those plots of land from being placed or made available on the market or exported; for relevant products that contain or have been made using cattle, and for such relevant products that have been fed with relevant products, the geolocation shall refer to all the establishments where the cattle were kept; for all other relevant products of Annex I, the geolocation shall refer to the plots of land;”</p>	<p>Details of the geolocation are recorded with all farm plots (Geometry and DateofMapping) associated with a parcel.</p> <p>Details of the date of time range of production (CropYear) are required to be uploaded with a parcel.</p> <p>Farm plot geolocation data from all farm plots associated with a parcel are tested against the ICE CoT Farm Plot Data Validation Methodology (including tests for deforestation tests for whether farm plots are located on land identified as being subject to Deforestation after 31 December 2020).</p> <p>A farm plot is only eligible to be referenced in an ICE CoT parcel if the required geolocation data has been provided in accordance with the specification and all tests have been passed in accordance with the methodology.</p> <p>Failed tests are reported to the user for information and potential remediation and certain test results may be challenged pursuant to the ICE CoT Challenge Process.</p> <p>IBA’s ICE CoT Challenge process allows users to challenge the outcome of certain Farm Plot Data Validation Methodology tests and is documented in the ICE CoT Challenge Procedures. The ICE CoT Challenge Procedures are reviewed by the AOC annually</p> <p><i>Please see the ICE CoT Physical Flow Traceability Data Input Specification and Physical Flow Traceability Data Validation Methodology.</i></p> <p><i>Please see the ICE CoT Farm Plot Data Input Specification and Farm Plot Data Validation Methodology.</i></p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 9(1). • Please also refer to EY’s response to Article 3(a). • We performed a walkthrough of the Challenge Process as part of the ICE CoT Platform walkthrough and inspected for evidence that the process allows users to challenge the outcome of certain Farm Plot Validation Methodology tests. • We obtained the ICE CoT Challenge Procedures and inspected for evidence that the process for challenge is documented. • We obtained the Terms of Reference for the AOC and inspected for evidence that the ICE CoT Challenge Procedures are reviewed annually.
<p>“(e) the name, postal address and email address of any business or person from whom they have been supplied with the relevant products;”</p>	<p>ICE CoT will record these details for users who transfer parcels pursuant to the onboarding process.</p> <p><i>Please see the ICE CoT Physical Flow Traceability Data Input Specification and Physical Flow Traceability Data Validation Methodology.</i></p>	<p>Please refer to EY’s response to Article 9(1).</p>
<p>“(f) the name, postal address and email address of any business, downstream operator or trader to whom the relevant products have been supplied;”</p>	<p>ICE CoT will also record these details for users who receive transfer parcels pursuant to the onboarding process.</p> <p><i>Please see the ICE CoT Physical Flow Traceability Data Input Specification and Physical Flow Traceability Data Validation Methodology.</i></p>	<p>Please refer to EY’s response to Article 9(1).</p>
<p>“(g) adequately conclusive and verifiable information that the relevant products are deforestation-free;”</p>	<p><i>Please see response to Article 3(a) regarding Farm Plot, Challenges, and Traceability.</i></p> <p>Third Party Desk and Field-Based Inspection Programme</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 9(1). • Please also refer to EY’s response to Article 3(a). • Please also refer to EY’s response to sections 1.4 and 1.5.

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	<p>Please see section 1.4 on Third Party Desk and Field-Based Inspection Programme regarding audits to support and check the truthfulness, accuracy and completeness of the Farm Plot Data, Physical Flow Traceability Input Data and Disclosure Statement Responses.</p> <p>Control Framework</p> <p>Please see section 1.5 on Control Framework (including controls regarding oversight, governance, transparency, membership, surveillance, platform operations, complaints, changes, operational risk management, employee skills, knowledge and experience, audit, outsourcing, information security, business continuity, along with grievance and record retention).</p>	
<p>“(h) adequately conclusive and verifiable information that the relevant commodities have been produced in accordance with the relevant legislation of the country of production, including any arrangement conferring the right to use the respective area for the purposes of the production of the relevant commodity.”</p>	<p>Please see response to Article 3(b) regarding Lawful Production and Traceability.</p> <p>Third Party Desk and Field-Based Inspection Programme</p> <p>Please see the section on 1.4 Third Party Desk and Field-Based Inspection Programme regarding audits to support and check the truthfulness, accuracy and completeness of the Disclosure Statement Responses.</p> <p>Control Framework</p> <p>Please see the section on 1.5 Control Framework (including controls regarding oversight, governance, transparency, membership, surveillance, platform operations, complaints, changes, operational risk management, employee skills, knowledge and experience, audit, outsourcing, information security, business continuity, along with grievance and record retention).</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 9(1). • Please also refer to EY’s response to Article 3(b). • Please also refer to EY’s response to sections 1.4 and 1.5.
<p><u>Article 9(2)</u></p> <p>“The operator shall make available to the competent authorities upon request the information, documents and data collected under this Article.”</p>	<p>All data on ICE CoT is available to NCAs for review on request.</p> <p>Users are required to maintain audit records confirming uploaded data is true, accurate, complete and current, which is available to IBA and NCAs on request.</p> <p>Please see sections 1.4 on Third Party Desk and Field-Based Inspection Programme, 10.3 on ICE CoT Record Retention and 10.2 on User Record Keeping,</p>	<p>Please refer to EY’s response to sections 1.4, 10.3 and 10.2.</p>
<p>Article 10 (Risk assessment)</p>		
<p><u>Article 10(1)</u></p> <p>“Operators shall verify and analyse the information collected in accordance with Article 9 and any other relevant documentation. On the basis of that information and documentation, the operators shall carry out a risk assessment</p>	<p>7.1 Objective – Risk Assessment</p> <p>To support users in demonstrating and assessing the verification and analysis of the required information, and the carrying out of a risk assessment based on the Article 9 information to establish whether there are risks of non-compliance with Article 3.</p> <p>Control Procedures:</p>	<ul style="list-style-type: none"> • We obtained the Input Data Specifications, Validation Methodologies and Disclosure Statements as described in the ICE CoT Control Procedures and inspected for evidence of the elements as described, including that the tests include tests for basic geometry and data

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<p><i>to establish whether there is a risk that the relevant products intended to be placed on the market or exported are non-compliant. Operators shall not place the relevant products on the market or export them, except where the risk assessment reveals no or only a negligible risk that the relevant products are non-compliant.”</i></p>	<p>Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols</p> <p>ICE CoT supports operators in demonstrating they have conducted a risk assessment in relation to (as applicable) countries of production and countries of origin (and parts thereof), areas of production, supply chains, and Article 9 information, in each case related to risks that relevant products are not ‘deforestation-free’ or ‘produced in accordance with the relevant legislation of the country of production’ (each as defined in the EUDR) and related criteria including presence of forests and prevalence of deforestation, the presence and rights of indigenous peoples, information reliability, country concerns, supply chain complexity and EUDR circumvention, and other information related to EUDR compliance.</p> <p>Information collected, organised and maintained in accordance with Article 9 is verified and analysed in accordance with the:</p> <ul style="list-style-type: none"> • ICE CoT Farm Plot Data Input Specification and Farm Plot Data Validation Methodology • ICE CoT Aggregator Systems Disclosure Statement, Lawful Production and Compliance Risk Disclosure Statement and related Disclosure Statement Review Protocols • ICE CoT Physical Flow Traceability Data Input Specification and Physical Flow Traceability Data Validation Methodology. • Physical Flow Traceability Disclosure Statement, Transport and Shipping Disclosure Statement, Tax, Anti-corruption, Trade and Customs Disclosure Statement, Exchange Warehouse Traceability Disclosure Statement and the related Disclosure Statement Review Protocols; and • Third Party Desk and Field-Based Inspection Programme. <p>which involve subjecting the collected data to format and completeness checks, together with methodology validation tests, review protocols and inspections/audits.</p> <p>The data specifications and methodologies referred to above incorporate a variety of risk assessment elements, including through the selection of required input data and reference data, test design, and parameter selection.</p> <p>This includes, but is not limited to, farm plot data geopoint proximity test in the ICE CoT Farm Plot Data Validation Methodology, which will fail a geopoint when it appears too close to a deforested area and require a polygon instead. Parameters are reviewed annually by management with any changes being implemented in the system with ITGC change management controls. Any material changes are approved by the AOC before implementation.</p> <p>Farm data methodology validation tests include tests for basic geometry and data reasonability, along with core tests covering deforestation and protected area overlaps.</p>	<p>reasonability, along with core tests covering deforestation and protected area overlap tests.</p> <ul style="list-style-type: none"> • We obtained the Standard Operating Procedures and inspected for evidence that the parameters are reviewed annually by management. • We inspected the ITGCs in place for IBA for evidence that user access and change management in the system is covered. • We obtained IBA’s IT policies and procedures on change management, user access management, and other IT operations and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained an example change request over the IT environment and inspected for evidence that the changes were implemented as management intended, by an independent production individual, tested in the relevant environments and monitored appropriately. • We obtained an example new user access request and change access request and inspected for evidence of the relevant approvals as documented in the request ticket and that user access was provided or not, as appropriate. • We obtained example Risk Assessment Dashboards for two countries, and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the Country Readiness Matrix and inspected for evidence of the requirements IBA has to fulfil prior to launching a new country on ICE CoT. • We obtained the Usage Rules and inspected for evidence that the dashboards do not constitute a complete risk assessment or complete due diligence for the purposes of EUDR or otherwise. • We obtained the Risk Assessment Dashboard Review Process document and inspected for evidence of annual review and update of the dashboards. • Please also refer to EY’s response to Article 10(2).

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	<p>Disclosure Statements include basic control point and system identification requirements along with detailed requirements for system capabilities and contingencies.</p> <p>Aggregator Systems and Lawful Production and Compliance Risk Disclosure Statements require identification of aggregators and a description of the IMS along with detailed requirements for the IMS to collect evidence of compliance with specified laws in specified legal topics and to assess compliance risks, and for specified mitigation measures to be implemented as required to remediate any residual risks.</p> <p>Tax, Anti-corruption, Trade and Customs Disclosure Statements require a description of the compliance systems along with detailed requirements for the systems to collect evidence of compliance with specified laws in specified legal topics and to assess compliance risks, and for specified mitigation measures to be implemented as required to remediate any residual risks.</p> <p>Physical Flow Traceability Disclosure Statements and Exchange Warehouse Traceability Disclosure Statements require identification of facilities and a description of the traceability system along with detailed requirements for the system to identify and track relevant products.</p> <p>Transport and Shipping Disclosure Statements require a description of the traceability system with detailed requirements for the system to identify and track relevant products.</p> <p>Traceability data methodology validation tests include tests for data completeness, reasonableness, linkage and sequencing, along with requirements for all aggregators, facilities and transport countries to benefit from completed and accepted disclosure statements.</p> <p>Applicable specifications and disclosure statements, and the related tests and review protocols have been developed based on expert input from Meridia, KPMG Netherlands and Space Intelligence, an extensive testing process, and with the input of the AOC and recommended technical experts.</p> <p>Farm plots, aggregators, facilities, transport countries, supply chains and parcels which have not satisfied all ICE CoT input data requirements and passed all validation methodology tests and reviews protocols are not eligible to be registered or transferred on ICE CoT.</p> <p><i>Risk Assessment Dashboard</i></p> <p>ICE CoT also provides a Risk Assessment Dashboard for each production and transportation country, setting out the Article 10(1) risk assessment requirements and the Article 10(2) risk assessment criteria.</p>	

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	<p>The dashboards are designed to show how ICE CoT can support a user in demonstrating an assessment of the risks of relevant products not being ‘deforestation-free’ or not being ‘produced in accordance with the relevant legislation of the country of production’ (each as defined in the EUDR).</p> <p>In relation to Article 10(1)(a) and (b), the ‘risk assessment method’ column includes applicable ICE CoT data specifications, methodologies and review protocols, and the third party desk and field-based inspection programme, and the ‘risk assessment and mitigation’ column includes an explanation of how these specifications, methodologies, protocols, and programme can be used to support a user in demonstrating its own risk assessment (and, as applicable, related mitigation) as part of its own due diligence.</p> <p>In relation to Article 10(2), the ‘risk assessment method’ column includes a description of the source of risk criteria information and, as applicable, the ICE CoT data specifications, methodologies and review protocols, which in each case are relevant to the specified criteria, and the ‘risk assessment and mitigation’ column includes the relevant information and, as applicable, an explanation of how these specifications, methodologies, protocols, and programme can be used to support a user in demonstrating its own risk assessment (and, as applicable, related mitigation) as part of its own due diligence.</p> <p><i>Please see further the response to Article 3 in relation to how ICE CoT can support users regarding demonstrating and assessing that uploaded parcels of relevant commodities and relevant products are ‘deforestation-free’ and ‘have been produced in accordance with the relevant legislation of the country of production’ (each as defined in the EUDR).</i></p> <p>As per the Usage Rules, the dashboards themselves do not constitute a complete risk assessment or complete due diligence for the purposes for the EUDR or otherwise. A user must ensure they conduct all required risk assessments as part of their own due diligence.</p> <p>A dashboard is required for a country to be an eligible production or transport or processing country in ICE CoT.</p> <p>There is a documented procedure, Risk Assessment Dashboard Review Process, for creation of the dashboards, which outlines that these are reviewed and updated on an annual basis.</p> <p><i>Please see response to Article 10(2).</i></p> <p>IBA has a documented Country Readiness Matrix which outlines the requirements to be met prior to launching a new country on ICE CoT.</p>	

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<p><u>Article 10(2)</u> <i>“The risk assessment shall take into account, in particular, the following criteria: [...]”</i></p>	<p><i>“(a) the assignment of risk to the relevant country of production or parts thereof in accordance with Article 29;”</i></p>	<p>Article 29 Country Risk Assessment ratings are included in the ICE CoT Risk Assessment Dashboards, along with a link to the published classification list, the implementing regulation and the annex.</p> <p>The Article 29 rating impacts the applicability of certain EUDR requirements including those relating to due diligence and NCA checks.</p> <p>ICE CoT does not implement reduced requirements in terms of its input data specifications and methodologies for commodities produced in ‘low risk’ countries, although this is a factor which can be considered in allocating audits under the Third Party Desk and Field-Based Inspection Programme.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the Risk Assessment Dashboards for two countries, and inspected for evidence of the Country Risk Assessment ratings, and a link to the published classification list, the implementing regulation and the annex. • We obtained the Third Party Desk and Field-Based Inspection Programme and inspected for evidence that country risk level can be a consideration when allocating audits.
	<p><i>“(b) the presence of forests in the country of production or parts thereof;”</i></p>	<p>Each Dashboard includes forest cover and deforestation area and percentage information for the country of production based on Space Intelligence and EU Forest Observatory map data to support a demonstration of analysis and assessment of the presence of forest and the prevalence of deforestation.</p> <p>The ICE CoT Farm Plot Data Input Specification and Farm Plot Data Validation Methodology, supported by the Third Party Desk and Field-Based Inspection Programme, incorporate verification, analysis and risk assessment elements related to the identification of deforestation.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the Risk Assessment Dashboards for two countries, and inspected for evidence of forest cover and deforestation area and percentage information for the country. • We obtained the Farm Plot Data Input Specification and Farm Plot Data Validation Methodology, and inspected for evidence that these incorporate verification, analysis and risk assessment elements related to the identification of deforestation.
	<p><i>“(c) the presence of indigenous peoples in the country of production or parts thereof;”</i></p>	<p>Each Dashboard includes publicly available data from LandMark detailing the percentages of country held or used by indigenous peoples and the percentage of that total which is acknowledged or not acknowledged by the country’s government.</p> <p>The ICE CoT Aggregator Systems Disclosure Statement and Review Protocol requires information regarding the presence of grievance mechanisms and complaints, penalties and sanctions.</p> <p>The ICE CoT Lawful Production and Compliance Risk Disclosure Statement and Review Protocol requires information on systems and processes (and mitigation measures, as applicable):</p> <ul style="list-style-type: none"> • to collect information and demonstrate compliance with applicable local legislation in terms of third parties’ rights and the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples; and • to collect information and assess risks associated with infringing the rights of indigenous peoples within supply chains, including: the presence of indigenous peoples; the consultation and cooperation in good faith with indigenous peoples, as appropriate; and the monitoring, assessment and evaluation of duly reasoned claims by, indigenous peoples. 	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the Risk Assessment Dashboards for two countries and inspected for evidence of the data from LandMark. • We obtained the Aggregator Systems Disclosure Statement and inspected for evidence that it requires information regarding the presence of grievance mechanisms and complaints, penalties and sanctions. • We obtained the ICE CoT Lawful Production and Compliance Risk Disclosure Statement and Review Protocol and inspected for evidence of the ICE CoT Control Procedures.

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“(d) the consultation and cooperation in good faith with indigenous peoples in the country of production or parts thereof;”	<i>Please see response to Article 10(2)(c).</i>	Please refer to EY’s response to Article 10(2)(c).
“(e) the existence of duly reasoned claims by indigenous peoples based on objective and verifiable information regarding the use or ownership of the area used for the purpose of producing the relevant commodity;”	<i>Please see response to Article 10(2)(c).</i>	Please refer to EY’s response to Article 10(2)(c).
“(f) prevalence of deforestation or forest degradation in the country of production or parts thereof;”	<i>Please see response to Article 10(2)(b).</i>	Please refer to EY’s response to Article 10(2)(b).
“(g) the source, reliability, validity, and links to other available documentation of the information referred to in Article 9(1);”	<p>The input data specifications, validation methodologies, disclosure statements and review protocols include a number of data completeness, reasonability, plausibility and consistency checks and tests.</p> <p>Users are required to maintain audit records confirming uploaded data is true, accurate, complete and current, which is available to IBA on request pursuant to the ICE CoT Service Agreement and Usage Rules and are subject to the Third Party Desk and Field-Based Inspection Programme.</p> <p><i>Please see sections 1.4 on Third Party Desk and Field-Based Inspection Programme, 10.3 on ICE CoT Record Retention and 10.2 on User Record Keeping.</i></p> <p>Each user of ICE CoT uploading data is required to pass the membership onboarding process, which includes, various KYC and governance requirements and checks, and maintain compliance with all membership requirements.</p> <p><i>Please see section 1.9 on Membership.</i></p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the input data specifications, validation methodologies, disclosure statements and review protocols and inspected for evidence that these include a number of data completeness, reasonability, plausibility and consistency checks and tests. • We obtained the ICE CoT Service Agreement and inspected for evidence of requirement to maintain audit records and make available to IBA on request. • We obtained the ICE CoT Usage Rules and inspected for evidence of requirement to maintain audit records and make available to IBA on request. • Please also refer to EY’s response to sections 1.4, 10.3, 10.2 and 1.9.
“(h) concerns in relation to the country of production and origin or parts thereof, such as level of corruption, prevalence of document and data	The Dashboards include publicly available data and metrics related to corruption, regulatory quality, rule of law, human rights, and conflict data to support a demonstration of analysis and assessment of concerns in relation to the country of production and origin.	<ul style="list-style-type: none"> • We obtained the Risk Assessment Dashboards for two countries, and inspected for evidence of inclusion of the corruption, regulatory quality, rule of law, human rights and conflict data, and whether the country is on an EU/UN sanctions list.

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<p><i>falsification, lack of law enforcement, violations of international human rights, armed conflict or presence of sanctions imposed by the UN Security Council or the Council of the European Union;”</i></p>	<p>They also record whether the country is identified as being on an EU or UN sanctions list.</p> <p>IBA’s membership process includes initial and ongoing sanctions check for all users.</p> <p><i>Please see response to Article 10(1).</i></p>	<ul style="list-style-type: none"> • We obtained the Risk Assessment Dashboard Review Process document and inspected for evidence that ICE CoT members are added to the media tracker along with Countries of Production and Supply Chain Countries, looking at amongst other things the risk status of the countries of production. • Please also refer to EY’s response to Article 10(1).
<p><i>“(i) the complexity of the relevant supply chain and the stage of processing of the relevant products, in particular difficulties in connecting relevant products to the plot of land where the relevant commodities were produced;”</i></p>	<p>The ICE CoT Physical Flow Traceability Data Input Specification and Validation Methodology is designed to collect and test data from simple and complex supply chains.</p> <p>Data is required to be uploaded per parcel and per Event and includes requirements and tests to demonstrate completeness, reasonableness, linkage and sequencing through aggregator supply, storage, processing, transport and shipping events, back to the eligible production plot and aggregator.</p> <p>The Aggregator Systems, Physical Flow Traceability and Transport and Shipping Disclosure Statements and Review Protocols require and check information to demonstrate the presence of traceability systems to identify and track relevant products within specified control points (aggregators, warehouses, factories, transport and shipping events) to ensure there is no mixing with unidentified product.</p> <p>Only parcels with all required data and which have satisfied all validation methodologies and reviews can be registered on ICE CoT.</p> <p>All physical flow traceability data is subject to the Third Party Desk and Field-Based Inspection Programme.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the ICE CoT Physical Flow Traceability Data Input Specification and Validation Methodology and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that data is required to be uploaded per parcel and per Event and includes requirements and tests to demonstrate completeness, reasonableness, linkage and sequencing. • We obtained the Aggregator Systems, Physical Flow Traceability and Transport and Shipping Disclosure Statements and Review Protocols and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that only parcels with all required data and which have satisfied all validation methodologies and reviews can be registered on ICE CoT. • We obtained the Third Party Desk and Field-Based Inspection Programme and inspected for evidence that all physical flow traceability data is subject to it.
<p><i>“(j) the risk of circumvention of this Regulation or of mixing with relevant products of unknown origin or produced in areas where deforestation or forest degradation has occurred or is occurring;”</i></p>	<p><i>Please see response to Article 10(2)(i).</i></p>	<p>Please refer to EY’s response to Article 10(2)(i).</p>

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<p>“(k) conclusions of the meetings of the Commission expert groups supporting the implementation of this Regulation, as published in the Commission’s expert group register;”</p>	<p>Each Dashboard includes a link to the expert group register for conclusions of expert groups supporting the implementation of the EUDR.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the Risk Assessment Dashboards for two countries and inspected for evidence of a link to the expert group register.
<p>“(l) substantiated concerns submitted under Article 31, and information on the history of non-compliance of operators or traders along the relevant supply chain with this Regulation;”</p>	<p>Each Dashboard will include a reference to any public EUDR judgements information (IBA will monitor public registers of EUDR judgements pursuant to the Risk Assessment Dashboard Review Process).</p> <p>IBA has a written ICE CoT Grievance Procedure, under which users or third parties can submit, or the ICE CoT platform itself can identify, new information regarding potential non-compliance of commodities or products registered on ICE CoT with EUDR or ICE CoT requirements.</p> <p>Users are required under the Usage Rules to use the Grievance Procedure to notify IBA of any information indicating that any commodities or products registered on ICE CoT, or a Platform User of ICE CoT, is at risk of not complying with either any applicable ICE CoT requirements or any applicable EUDR requirements (or would be at risk of not complying with EUDR requirements if the commodities or products were to be placed or made available on the EU market). This includes providing IBA with both prospective and retrospective information regarding EUDR notifications (made or received) and any substantiated concerns within the meaning of Article 2(31) of EUDR, and any action taken by Member States or national Competent Authorities.</p> <p><i>Please also see section 13.1 Grievance.</i></p> <p>Users are also required under the Service Agreement to submit true, accurate, complete and current data, keep the submitted data true, accurate, complete and current, and to notify IBA promptly of any information, errors or other circumstances which render any Parcel data no longer true, accurate, complete and current.</p> <p>The ICE CoT Aggregator Systems Disclosure Statement and Review Protocol requires information regarding the presence of grievance mechanisms, complaints, penalties and sanctions.</p> <p>Each user of ICE CoT uploading data is required to pass the membership onboarding process, which includes, various KYC and governance requirements and checks, and maintain compliance with all membership requirements.</p> <p><i>Please also see section 1.9 on Membership.</i></p> <p>The Third Party Desk and Field-Based Inspection Programme is designed to check the truthfulness, completeness and accuracy of the data submitted to ICE CoT.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the Risk Assessment Dashboards for two countries and inspected for evidence of reference to public EUDR judgements information. • We obtained the ICE CoT Grievance Procedure and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the Usage Rules and inspected for evidence that users are required to use the Grievance Procedure to notify IBA of potential non-compliance. • Please also refer to EY’s response to section 13.1. • We obtained the ICE CoT Service Agreement and inspected for evidence of the requirement for users as described in the ICE CoT Control Procedures. • We obtained the ICE CoT Aggregator Systems Disclosure Statement for evidence that this requires information regarding the presence of grievance mechanisms, complaints, penalties and sanctions. • Please refer to EY’s response to section 1.9. • Please also refer to EY’s response to section 1.4.

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	<i>Please also see section 1.4 Third Party Desk and Field-Based Inspection Programme.</i>	
<i>“(m) any information that would point to a risk that the relevant products are non-compliant;”</i>	<i>Please see response to Article 10(2)(n).</i>	Please refer to EY’s response to Article 10(2)(n).
<i>“(n) complementary information on compliance with this Regulation, which may include information supplied by certification or other third-party verified schemes, including voluntary schemes recognised by the Commission under Article 30(5) of Directive (EU) 2018/2001 of the European Parliament and of the Council (21), provided that the information meets the requirements set out in Article 9 of this Regulation.”</i>	ICE CoT Aggregator Systems Disclosure Statements require information regarding IMS audits and third party certification schemes. This is a factor which can be considered in allocating audits under the Third Party Desk and Field-Based Inspection Programme.	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 10(1). • We obtained the Aggregator Systems Disclosure Statements and inspected for evidence of requiring information regarding IMS audits and third party certification schemes. • We obtained the Third Party Desk and Field-Based Inspection Programme and inspected for evidence that Aggregator systems Disclosure Statements are a factor in allocating audits.
<p><u>Article 10(4)</u> <i>“The operators shall document and review the risk assessments at least on an annual basis and make them available to the competent authorities upon request. Operators shall be able to demonstrate how the information gathered was checked against the risk assessment criteria set out in paragraph 2 and how they determined the degree of risk.”</i></p>	<p>The ICE CoT data specifications and methodologies are reviewed by the AOC annually.</p> <p>The Risk Assessment Dashboards are subject to regular review and update pursuant to the Risk Assessment Dashboard Review Process.</p> <p>IBA publishes the Input Data and Methodology Overview on its ICE CoT website.</p> <p>Users of the platform will have access to their uploaded ICE CoT data, the applicable shared data pursuant to the Data Sharing Specification, and applicable test results. They will also have access to the detailed data specifications and methodologies.</p> <p>All ICE CoT data specifications, methodologies and data will be available to an NCA on request.</p> <p>As outlined in the Disclosure Statements, users are required to update the Disclosure Statements on at least an annual basis. In addition, the Usage Rules outline this requirement.</p> <p>A completed Disclosure Statement expires in the system after 12 months, so questionnaires must be reconfirmed in the system by users on at least an annual basis.</p>	<ul style="list-style-type: none"> • We obtained the Terms of Reference of the AOC and inspected for evidence of the annual review of the ICE CoT data specifications and methodologies. • We obtained examples of the Risk Assessment Dashboard for two countries, and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We inspected the ICE CoT website for evidence that the Input Data and Methodology Overview is published. • We obtained the Usage Rules and inspected for evidence that users will have access to detailed data specifications and methodologies. • We obtained the Service Agreement and inspected for evidence that all ICE CoT data will be available to an NCA on request.

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	<p>Users are required to maintain audit records confirming uploaded data is true, accurate, complete and current, which is available to IBA and NCAs on request.</p>	<ul style="list-style-type: none"> • We obtained the Disclosure Statements and inspected for evidence that users are required to update these on at least an annual basis. • We obtained the Usage Rules and inspected for evidence that users are required to update the Disclosure Statements on at least an annual basis. • We performed a walkthrough of the ICE CoT Platform and inspected for evidence that the annual re-completion of the questionnaires is enforced in the system. • We obtained the Service Agreement and inspected for evidence that users are required to maintain audit records confirming uploaded data is true, accurate, complete and current, which are available to IBA and NCAs on request.
Article 11 (Risk Mitigation)		
<p><u>Article 11(1)</u></p> <p><i>“Except where a risk assessment carried out in accordance with Article 10 reveals that there is no or only a negligible risk that the relevant products are non-compliant, the operator shall, prior to placing the relevant products on the market or exporting them, adopt risk mitigation procedures and measures that are adequate to achieve no or only a negligible risk. Such procedures and measures may include any of the following:</i></p> <ul style="list-style-type: none"> <i>(a) requiring additional information, data or documents;</i> <i>(b) carrying out independent surveys or audits;</i> <i>(c) taking other measures pertaining to information requirements set out in Article 9.</i> <p><i>Such procedures and measures may also include supporting compliance with this Regulation by that operator’s suppliers, in particular</i></p>	<p>8.1 Objective - Risk Mitigation Procedures</p> <p><i>To support users in demonstrating the adoption of risk mitigation measures and procedures adequate to achieve no or a negligible risk of non-compliance with Article 3.</i></p> <p>Control Procedures:</p> <p>Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols</p> <p>ICE CoT supports operators in demonstrating (and assessing) the adoption of risk mitigation procedures and measures, including related to risks that relevant products are not ‘deforestation-free’ or ‘produced in accordance with the relevant legislation of the country of production’ (each as defined in the EUDR), where the risk assessment has indicated a non-negligible risk of non-compliance.</p> <p>Mitigation in respect of assessed risks may be demonstrated through the:</p> <ul style="list-style-type: none"> • ICE CoT Farm Plot Data Input Specification and Farm Plot Data Validation Methodology • ICE CoT Aggregator Systems Disclosure Statement, Lawful Production and Compliance Risk Disclosure Statement and related Disclosure Statement Review Protocols • ICE CoT Physical Flow Traceability Data Input Specification and Physical 	<ul style="list-style-type: none"> • We obtained the Input Data Specifications, Validation Methodologies, Disclosure Statements and Review Protocols referenced in the ICE CoT Control Procedures and inspected for evidence that mitigation can be demonstrated through these. • We obtained the Disclosure Statements and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the Farm Plot Data Validation Methodology and inspected for evidence of the elements described in the ICE CoT Control Procedures, including that the tests include tests for basic geometry and data reasonability, along with core tests covering deforestation and protected area overlaps. • We obtained the Disclosure Statements and inspected for evidence of the elements described in the ICE CoT Control Procedures. • We obtained the Physical Flow Traceability Data Validation Methodology and inspected for evidence that

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<p><i>smallholders, through capacity building and investments.”</i></p>	<p>Flow Traceability Data Validation Methodology.</p> <ul style="list-style-type: none"> Physical Flow Traceability Disclosure Statement, Transport and Shipping Disclosure Statement, Tax, Anti-corruption, Trade and Customs Disclosure Statement, Exchange Warehouse Traceability Disclosure Statement and the related Disclosure Statement Review Protocols Third Party Desk and Field-Based Inspection Programme <p>which involve subjecting collected data to format and completeness checks, together with methodology validation tests, review protocols and inspections/audits.</p> <p>The data specifications and methodologies referred to above incorporate a variety of risk mitigation elements, including through the selection of required data, test design, and parameter selection.</p> <p>For example, under the farm plot data geoproximity test, the ICE CoT Farm Plot Data Validation Methodology will fail a geopoint when it appears too close to a deforested area and require a polygon instead.</p> <p>Farm data methodology validation tests include tests for basic geometry and data reasonability, along with core tests covering deforestation and protected area overlaps. Additional information is requested where users consider they have documentary permissions for eligible farms located in protect areas.</p> <p>Disclosure Statements include basic identification requirements along with detailed requirements for system capabilities and contingencies.</p> <p>Aggregator Systems Disclosure Statements and Lawful Production and Compliance Risk Disclosure Statements require identification of aggregators and a description of the IMS along with detailed requirements for the IMS to collect evidence of compliance with specified laws and to assess compliance risks, and for specified mitigation measures to be implemented as required to remediate any identified residual risks. Additional information is requested where, for example, there have been complaints or breaches of sustainability commitments along the supply chain, penalties or sanctions, or ongoing proceedings, and on additional mitigation measures.</p> <p>Tax, Anti-corruption, Trade and Customs Disclosure Statements require a description of the compliance systems along with detailed requirements for the systems to collect evidence of compliance with specified laws and to assess compliance risks, and for specified mitigation measures to be implemented as required to remediate any residual risks. Additional information is requested on additional mitigation measures.</p> <p>Physical Flow Traceability Disclosure Statements and Exchange Warehouse Traceability Disclosure Statements require identification of facilities and a description of the traceability system along with detailed requirements for the system to identify and track relevant products.</p>	<p>the tests include what is described in the ICE CoT Control Procedures.</p> <ul style="list-style-type: none"> We performed a walkthrough of the farm plot validation tests and the traceability data tests in the ICE CoT Platform. We obtained the contractual agreements with Meridia, KPMG Netherlands and Space Intelligence, and inspected for evidence that they provided expert opinion to aid in the development of applicable specifications and disclosure statements, and related tests and review protocols. We obtained the minutes of meetings for the AOC and inspected for evidence that the AOC provided input during the development of the applicable specifications and disclosure statements, and related tests and review protocols. We performed a walkthrough of the ICE CoT Platform and inspected for evidence that parcels which have not satisfied all input data requirements and passed all methodology tests and review protocols are not eligible to be registered or transferred on ICE CoT. Please also refer to EY’s response to section 1.4 and section 10.2. We obtained examples of the Risk Assessment Dashboard for two countries, and inspected for evidence of the elements as described in the ICE CoT Control Procedures. Please also refer to EY’s response to section 7.1.

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	<p>Transport and Shipping Disclosure Statements require a description of the traceability system with detailed requirements for the system to identify and track relevant products.</p> <p>Traceability data methodology validation tests include tests for data completeness, reasonableness, linkage and sequencing, along with requirements for all aggregators, facilities and transport countries to benefit from completed and accepted disclosure statements.</p> <p>Applicable specifications and disclosure statements, and the related tests and review protocols have been developed based on expert input from Meridia, KPMG Netherlands and Space Intelligence, an extensive testing process, and with the input of the AOC and technical experts.</p> <p>Farm plots, aggregators, facilities, transport countries, supply chains and parcels which have not satisfied all ICE CoT input data requirements and passed all validation methodology tests and reviews protocols are not eligible to be registered or transferred on ICE CoT.</p> <p><i>Third Party Desk and Field-Based Inspection Programme</i></p> <p><i>Please see section 1.4 on Third Party Desk and Field-Based Inspection Programme regarding audits to support and check the truthfulness, accuracy and completeness of the uploaded commodity data, including farm plot and physical flow traceability data and disclosure statement responses.</i></p> <p><i>User Record Keeping</i></p> <p><i>Please see section 10.2 on User Record Keeping regarding requirements on users to keep records and evidence related to the data they have submitted to ICE CoT and providing or procuring access to IBA's auditors.</i></p> <p><i>Risk Assessment Dashboard</i></p> <p>ICE CoT also provides a Risk Assessment Dashboard for each production and transportation country, setting out how ICE CoT supports a user in demonstrating the mitigation of residual non-negligible risks of relevant products not being 'deforestation-free' or being 'produced in accordance with the relevant legislation of the country of production' (each as defined in the EUDR).</p> <p><i>Please also see section 7.1 on Risk Assessment.</i></p>	

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<p><u>Article 11(2)</u> “Operators shall have in place adequate and proportionate policies, controls and procedures to mitigate and manage effectively the risks of non-compliance of relevant products identified. Those policies, controls and procedures shall include: [...]”</p>	<p>9.1 Objective – Mitigants <i>To support users in demonstrating they have in place adequate and proportionate policies, controls and procedures to mitigate and manage effectively the risks of non-compliance with Article 3.</i></p> <p>Control Procedures: <i>See response for Article 11(1).</i></p> <p>ICE CoT will also require each operator or trader entity submitting a DDS through ICE CoT to have confirmed in their membership onboarding documentation that they have the policies, controls and procedures referred to in points (a) and (b).</p> <p>Users must provide to IBA any onboarding information requested from time to time.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 11(1). • We obtained the membership onboarding documentation and inspected for evidence that operator or trader entities have to confirm they have policies, controls and procedures referred to in Article 11(2)(a) and 2(b). • We obtained the Service Agreement and inspected for evidence that users must provide to IBA any onboarding information requested from time to time.
<p><u>Article 11(3)</u> “The decisions on risk mitigation procedures and measures shall be documented, reviewed at least on an annual basis and made available by the operators to the competent authorities upon request. Operators shall be able to demonstrate how decisions on risk mitigation procedures and measures were taken.”</p>	<p>The ICE CoT data specifications and methodologies are reviewed by the AOC annually.</p> <p>IBA publishes on its ICE CoT website the ICE CoT Input Data Specification and Methodology Overview.</p> <p>All detailed ICE CoT data specifications and methodologies are available to NCAs to review on request. All data on ICE CoT is available to NCAs for review on request.</p> <p>Users of the platform will have access to their uploaded ICE CoT data, the applicable shared data and applicable test results. They will also have access to the detailed data specifications and methodologies.</p> <p>Users are required to keep records and evidence related to data they have submitted to ICE CoT (confirming it is true accurate, complete and current) and to require (and use reasonable efforts to ensure) that entities in their supply chains keep such records and evidence, in each case in accordance with the requirements set out in the Service Agreement and the Usage Rules.</p>	<p>Please refer to EY’s response to Article 11(2)(a).</p> <ul style="list-style-type: none"> • We obtained the Terms of Reference for the AOC and inspected for evidence of annual review of the ICE CoT data specifications and methodologies. • We obtained the Service Agreement and inspected for evidence that all ICE CoT data will be available to NCAs for review on request, and users of the platform will have access to their uploaded ICE CoT data, applicable shared data and applicable test results. • We obtained the Usage Rules and inspected for evidence that users will have access to detailed data specifications and methodologies. • We inspected the ICE CoT website for evidence that it publishes the ICE CoT Input Data Specification and Methodology Overview. • We obtained the ICE CoT Service Agreement and the ICE CoT Usage Rules, and inspected for evidence of the

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	<p>As outlined in the Disclosure Statements, users are required to update the Disclosure Statements on at least an annual basis. In addition, the Usage Rules outline this requirement.</p> <p>A completed Disclosure Statement expires in the system after 12 months, so questionnaires must be reconfirmed in the system by users on at least an annual basis.</p>	<p>user record keeping requirements as described in the ICE CoT Control Procedures.</p> <ul style="list-style-type: none"> • We obtained the Usage Rules and inspected for evidence that users are required to update the Disclosure Statements on at least an annual basis. • We performed a walkthrough of the ICE CoT platform and inspected that a completed Disclosure Statement expires in the system after 12 months.
Article 12 (Establishment and maintenance of due diligence systems, reporting and record keeping)		
<p><u>Article 12(1)</u></p> <p><i>“In order to exercise due diligence in accordance with Article 8, operators shall establish and keep up to date a framework of procedures and measures to ensure that the relevant products they place on the market or export comply with Article 3 (‘due diligence system’).”</i></p>	<p>10.1 Objective – Due Diligence System</p> <p><i>To support users in demonstrating they have established and keep up to date due diligence system.</i></p> <p>Control Procedures:</p> <p>Users may use ICE CoT as part of their EUDR due diligence systems.</p> <p>IBA publishes on its ICE CoT website the ICE CoT Input Data Specification and Methodology Overview.</p> <p>All detailed ICE CoT data specifications and methodologies are available to NCAs to review on request. All data on ICE CoT is available to NCAs for review on request.</p> <p>Users of the platform will have access to their uploaded ICE CoT data, the applicable shared data and applicable test results. They will also have access to the detailed data specifications and methodologies.</p>	<ul style="list-style-type: none"> • We inspected the ICE CoT website for evidence that the ICE Cot Input Data Specification and Methodology Overview is published. • We obtained the Usage Rules and inspected for evidence that users have access to the detailed data specifications and methodologies.
<p><u>Article 12(2)</u></p> <p><i>“Operators shall review the due diligence system at least once a year. Where operators become aware of new developments which could influence the due diligence system, they shall update the due diligence system to take account of those developments. Operators shall keep a record of such updates in their due diligence systems for five years.”</i></p>	<p>As outlined in the Disclosure Statements, users are required to update the Disclosure Statements on at least an annual basis. In addition, the Usage Rules outline this requirement.</p> <p>A completed Disclosure Statement expires in the system after 12 months, so questionnaires must be reconfirmed in the system by users on at least an annual basis.</p> <p>Users are required to maintain audit records confirming uploaded data is true, accurate, complete and current, which is available to IBA and NCAs on request.</p>	<ul style="list-style-type: none"> • We obtained the Disclosure Statements and Usage Rules, and inspected for evidence of the requirement to update on at least an annual basis. • We performed a walkthrough of the ICE CoT platform and inspected that a completed Disclosure Statement expires in the system after 12 months. • We obtained the Usage Rules and Service Agreement and inspected for evidence that users are required to maintain audit records confirming uploaded data is true accurate, complete and current, which is available to IBA and NCAs on request.
<p><u>Article 12(3)</u></p>	<p>ICE CoT has been designed as platform to support users in demonstrating and assessing the exercise of the required due diligence under EUDR.</p>	<ul style="list-style-type: none"> • Please refer to EY response to Article 8.

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<p><i>“Operators who do not fall within the categories of SMEs, including microenterprises, or natural persons shall, on an annual basis, publicly report as widely as possible, including via the internet, on their due diligence system, including on the steps taken by them to fulfil their obligations as set out in Article 8. Operators who fall also within the scope of other Union legal acts that lay down requirements regarding value chain due diligence may fulfil their reporting obligations under this paragraph by including the required information when reporting in the context of those other Union legal acts.”</i></p>	<p><i>See further response for Article 8.</i></p> <p>ICE CoT will make public the ICE CoT Input Data Specification and Methodology Overview.</p> <p>Users may refer to this and their use of ICE CoT in their reportings.</p> <p>However, as set out in the Service Agreement and in the Usage Rules, users of ICE CoT are solely responsible for their own compliance and the compliance of commodities or products and any associated data associated with EUDR and any other legislation, including in each case regarding their own due diligence, and the production, transfer, storage, processing, import, supply and export of commodities and products.</p>	<ul style="list-style-type: none"> • We inspected the ICE CoT website for evidence that the ICE CoT Input Data Specification and Methodology Overview is made public. 	
<p><u>Article 12(4)</u></p> <p><i>“Without prejudice to Union data protection legislation, the reporting as referred to in paragraph 3 shall include the following information concerning relevant commodities and relevant products: [...]”</i></p>	<p><i>“(a) a summary of the information referred to in Article 9(1), points (a), (b) and (c);”</i></p>	<p><i>Please see response for Article 12(3).</i></p> <p>This information is referred to in ICE CoT Input Data Specification and Methodology Overview, and the specific data for each parcel is available to users on ICE CoT pursuant to the Data Sharing Specification.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 12(3). • We obtained the Data Sharing Specification and inspected for evidence that the specific data for each parcel is available to users on ICE CoT.
	<p><i>“(b) the conclusions of the risk assessment carried out pursuant to Article 10 and measures undertaken pursuant to Article 11 and a description of the information and evidence obtained and used to assess the risk;”</i></p>	<p><i>Please see response for Article 12(3).</i></p> <p>Users may refer to the ICE CoT Input Data Specification and Methodology Overview setting out the information required on ICE CoT and the ICE CoT methodologies.</p> <p>Parcels on ICE CoT are required to have all specified data and have satisfied all reviews and validation tests (including the embedded risk assessment and risk mitigation elements noted in the responses to Articles 10 and 11).</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 12(3). • We obtained the Data Sharing Specification and inspected for evidence of the specified data that parcels on ICE CoT are required to have.
	<p><i>“(c) where applicable, a description of the process of consultation of indigenous peoples, local communities and other customary tenure rights holders or of the civil society organisations that are present in the area of production of the relevant commodities and relevant products.”</i></p>	<p><i>Please see response for Article 12(3).</i></p> <p>Users may refer to in ICE CoT Input Data Specification and Methodology Overview setting out the disclosure statement confirmations required on ICE CoT in respect of indigenous peoples’ rights.</p> <p>The Lawful Production and Compliance Risk Disclosure Statement includes confirmations required on ICE CoT in respect of indigenous peoples, communities and other customary tenure rights holders or of the civil society organisations present in the area of production, including any consultations.</p>	<ul style="list-style-type: none"> • Please refer to EY’s response to Article 12(3). • We obtained the Lawful Production and Compliance Risk Disclosure Statement and inspected for evidence of the confirmations as described in the ICE CoT Control Procedures.

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<p><u>Article 12(5)</u></p> <p><i>“Operators shall keep for at least five years all documentation related to due diligence, such as all records, measures and procedures pursuant to Article 8. They shall make that documentation available to the competent authorities upon request.”</i></p>	<p>ICE CoT will maintain all ICE CoT input data specifications and methodologies, and all commodity data and results data for an indefinite period (and in any event at least five years). This includes data associated with parcels and their related DDS, DDS reference numbers and validation keys, which are available to NCAs on request.</p> <p>10.2 Objective - User Record Keeping</p> <p><i>Users should maintain audit records to demonstrate uploaded data is true, accurate, complete and current.</i></p> <p>Control Procedures:</p> <p>Users are required under the Service Agreement and Usage Rules to keep records and evidence related to data they have submitted to ICE CoT (confirming it is true accurate, complete and current) and to require (and use reasonable efforts to ensure) that entities in their supply chains keep such records and evidence, in each case in accordance with the requirements set out in the Service Agreement. This data should be maintained for seven years after the termination of the Service Agreement. Data over seven years old is not subject to the obligation unless specified by IBA.</p> <p>Users agree to cooperate with IBA and IBA’s independent third party auditor in conducting any audit or inspection pursuant to the Data Inspection and Verification Programme, including by providing or procuring access to any information, documentation, records, systems, processes, and other evidence requested to support and confirm their submitted data is true, accurate, complete and satisfies all ICE CoT requirements.</p> <p>10.3 Objective - ICE CoT Record Retention</p> <p><i>IBA should maintain appropriate and effective record keeping processes for ICE CoT-related data, including uploaded data, results, updates and information on challenges, grievances and audits. IBA should maintain an audit trail of ICE CoT information.</i></p> <p>Control Procedures:</p> <p>IBA has record keeping arrangements under a documented record retention schedule for ICE CoT included in IBA’s Internal Compliance Manual, including keeping the following for an indefinite period (and in any event at least five years):</p> <ul style="list-style-type: none"> • Commodity data and results data, • A record of the due diligence statements • A record of updates to ICE CoT Methodologies • Onboarding information • Membership Information • ICE CoT system documentation • Information relating to Challenges, Grievances, Complaints and Audits 	<ul style="list-style-type: none"> • We obtained the Service Agreement and Usage Rules and inspected for evidence of the requirements for user record retention as described in the ICE CoT Control Procedures. • We obtained IBA’s Internal Compliance Manual and inspected for evidence that the input data specifications, methodologies, commodity data and result data will all be kept for an indefinite period. • We obtained the daily and weekly backups of IBA systems/drives and inspected for evidence that ICE CoT platform data will be retained for an indefinite period. • We obtained management’s confirmation of the systems/drives where the records as described in ICE CoT Control Procedures are retained.

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	<p>IBA maintains an audit trail of ICE CoT information including uploaded data and test results, challenge, grievance, complaint and audits.</p> <p>IBA's records are kept in such a form as to allow replication and full understanding of the output and to enable an audit or evaluation of input data and determinations. IBA keeps historical information in different formats based on the age of the data, in such a way as to ensure that it is easily retrievable upon request.</p>	
<i>Article 13 Simplified due diligence)</i>		
<p><u>Article 13(1)</u></p> <p><i>“When placing relevant products on the market or exporting them, operators shall not be required to fulfil the obligations under Articles 10 and 11 where, after having assessed the complexity of the relevant supply chain and the risk of circumvention of this Regulation or the risk of mixing with products of unknown origin or origin in high-risk or standard-risk countries or parts thereof, they have ascertained that all relevant commodities and relevant products have been produced in countries or parts thereof that were classified as low risk in accordance with Article 29. In such cases, the operator shall make available to the competent authority upon request relevant documentation demonstrating that there is a negligible risk of circumvention of this Regulation or of mixing with products of unknown origin or origin in high-risk or standard-risk countries or parts thereof.”</i></p>	<p>ICE CoT does not implement reduced requirements in terms of its input data specifications and methodologies for commodities produced in ‘low risk’ countries, although this is a factor which can be considered in allocating audits under the Third Party Desk and Field-Based Inspection Programme.</p>	<p>No matters to report on.</p>
<p><u>Article 13(2)</u></p> <p><i>“Notwithstanding paragraph 1 of this Article, if the operator obtains or is made aware of any relevant information, including as a result of the assessment carried out under paragraph 1 of this Article, and including substantiated concerns submitted under Article 31, that would point to a risk that the relevant products do not comply with this Regulation or that this Regulation is circumvented, the operator shall fulfil all of the obligations under Articles 10 and</i></p>	<p><i>See response for Article 13(1).</i></p>	<p>Please refer to EY's response to Article 13(1).</p>

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<p><i>11 and shall immediately communicate any relevant information to the competent authority.”</i></p>		
<p><u>Article 13(3)</u></p> <p><i>“Where a competent authority is made aware of any information that would point to a risk of circumvention of this Regulation, including in cases in which relevant commodities or relevant products produced in a standard-risk or high-risk country or a part thereof are subsequently processed in a low-risk country or a part thereof from where they are placed on or leave the market, the competent authority shall take immediate action in accordance with Article 17(1) and, where necessary, adopt interim measures in accordance with Article 23.”</i></p>	<p><i>See response for Article 13(1).</i></p>	<p>Please refer to EY’s response to Article 13(1).</p>
<p><u>Articles 16, 18, 19</u></p> <p>Article 16 - <i>“The competent authorities shall carry out checks within their territory to establish whether operators, downstream operators, and traders established in the Union comply with this Regulation. The competent authorities shall carry out checks within their territory to establish whether the relevant products that the operator, downstream operator, or trader has placed or intends to place on the market, has made available or intends to make available on the market or has exported or intends to export comply with this Regulation [...]”</i></p> <p>Article 18 – <i>“The checks on operators shall include:</i></p> <p style="padding-left: 20px;"><i>(a) examination of their due diligence system, including risk assessment and risk mitigation procedures, and of documentation and records that demonstrate the proper functioning of the due diligence system;</i></p>	<p>11.1 Objective – NCA Checks</p> <p><i>To provide a platform which supports users in complying with NCA checks.</i></p> <p>Control Procedures:</p> <p>ICE CoT will maintain all ICE CoT input data specifications and methodologies, and all commodity data and results data for an indefinite period. This includes data associated with parcels and their related DDS and DDS reference numbers, which are available to NCAs on request.</p> <p><i>Please also see section 10.3 on ICE CoT Record Retention.</i></p> <p>Users are required to maintain audit records confirming uploaded data is true, accurate, complete and current, which are available to NCAs on request.</p> <p><i>Please also see section 10.2 on User Record Keeping.</i></p> <p>As per the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers</p>	<ul style="list-style-type: none"> • We obtained the record retention schedule for ICE CoT and inspected for evidence that all data and methodologies are kept for an indefinite period. • Please also refer to EY’s response to section 10.3. • We obtained the Usage Rules and inspected for evidence that users are required to maintain audit records confirming uploaded data is true, accurate, complete and current, and available to NCAs on request. • Please also refer to EY’s response to section 10.2.

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p>(b) <i>examination of documentation and records that demonstrate that a specific relevant product that the operator has placed or intends to place on the market or intends to export complies with this Regulation, including, when applicable, through risk mitigation measures, as well as examination of the relevant due diligence statements or, for micro or small primary operators, examination of the relevant simplified declaration or the information made available by Member States per operator in the information system referred to in Article 33. [...]</i>”</p> <p>Article 19 – <i>“The checks on downstream operators and traders shall include the examination of documentation and records that demonstrate compliance with Article 5(1), (2), (3) and (4) [...]</i>”</p>		
<p><u>Articles 17, 23, 24, 25</u></p> <p>Article 17 - <i>“Competent authorities shall identify situations where relevant products present such high risk of non-compliance with Article 3 that they require immediate action by competent authorities before those relevant products are placed or made available on the market or exported. Competent authorities shall register such identified situations in the information system referred to in Article 33 [...]</i>”</p> <p>Article 23 – <i>“Member States shall provide for the possibility for their competent authorities to take immediate interim measures, including the seizure of the relevant commodities or relevant products, or the suspension of the placing or making available on the market or the export of the relevant commodities or relevant products, when potential non-compliance with this</i></p>	<p>12.1 Objective – User Compliance with NCA</p> <p><i>To provide a platform which supports users in complying with NCA action.</i></p> <p>Control Procedures:</p> <p>ICE CoT benefits from a Grievance Procedure and requires users to inform IBA of information indicating risks of non-compliance and any EUDR notifications and actions taken.</p> <p>The Procedure notes that the Grievance Committee may need to delay or defer its determination until any substantiated concern or other assessment process being considered or undertaken by a national competent authority has concluded and any measures or action under the EUDR have been taken.</p> <p>Outcomes of ICE CoT’s Grievance Procedure include the ability to suspend parcels and users.</p> <p><i>Please also see section 13.1 Grievance.</i></p>	<ul style="list-style-type: none"> • We obtained the ICE CoT Grievance Procedure and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • Please also refer to EY’s response to the section 13.1 Grievance.

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p><i>Regulation has been detected on the basis of any of the following: [...]”</i></p> <p><i>Article 24 – “Without prejudice to Article 25, where competent authorities establish that an operator, downstream operator or trader has not complied with this Regulation or that a relevant product placed or made available on the market or exported is non-compliant, they shall without delay require the operator, downstream operator or trader to take appropriate and proportionate corrective action to bring the non-compliance to an end within a specified and reasonable period of time [...]”</i></p> <p><i>Article 25 – “Without prejudice to the obligations of Member States under Directive 2008/99/EC of the European Parliament and of the Council (*3), Member States shall lay down rules on penalties applicable to infringements of this Regulation by operators, downstream operators and traders and shall take all measures necessary to ensure that they are implemented. Member States shall notify the Commission of those rules and of those measures and shall notify it, without delay, of any subsequent amendments affecting them [...]”</i></p>		
<p><u>Article 31</u></p> <p><i>“Natural or legal persons may submit substantiated concerns to competent authorities when they consider that one or more operators or traders are not complying with this Regulation [...]”</i></p>	<p>13.1 Objective - Grievance</p> <p><i>The platform will benefit from a Grievance Procedure through which users or third parties can submit, or the ICE CoT platform itself can identify, information regarding potential non-compliance of commodities or products registered on ICE CoT with EUDR or ICE CoT requirements.</i></p> <p>Control Procedures:</p> <p>IBA has a written publicly available ICE CoT Grievance Procedure under which users or third parties can submit, or the ICE CoT platform itself can identify, new information regarding potential non-compliance of commodities or products registered on ICE CoT with EUDR or ICE CoT requirements.</p> <p>Users are required under the Usage Rules to use the Grievance Procedure to notify IBA of any information indicating that any commodities or products registered on ICE CoT, or a Platform User of ICE CoT, is at risk of not complying with either any</p>	<ul style="list-style-type: none"> • We obtained the ICE CoT Grievance Procedure and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We obtained the Usage Rules and inspected for evidence of the elements as described in the ICE CoT Control Procedures. • We inspected the ICE CoT website for evidence that ICE CoT Grievance Procedure is made publicly available, including the link to the online grievance form. • We obtained the ICE CoT Grievance Committee Terms of Reference and inspected for evidence that grievances are reviewed by the Committee.

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	<p>applicable ICE CoT requirements or any applicable EUDR requirements (or would be at risk of not complying with EUDR requirements if the commodities or products were to be placed or made available on the EU market). This includes providing IBA with both prospective and retrospective information regarding EUDR notifications (made or received) and any substantiated concerns within the meaning of Article 2(31) of EUDR, and any action taken by Member States or national Competent Authorities.</p> <p>Grievances are submitted or identified through the submission of an online grievance form and processed by IBA for review by the ICE CoT Grievance Committee in accordance with its Terms of Reference.</p> <p>IBA may submit grievances resulting from the Third Party Desk and Field-Based Inspection programme, Surveillance, or general monitoring (IBA will monitor public registers of EUDR judgements pursuant to the Risk Assessment Dashboard Update Process).</p> <p>IBA or the Committee may request further information to determine the appropriate course of action, which may include IBA or an ICE CoT Member informing a National Competent Authority (NCA) or supply chain actors of the grievance, or suspending any commodities and products on ICE CoT permanently or temporarily.</p> <p>The Committee may defer any decision until any substantiated concern or other EUDR assessment process has concluded and any measures or action under the EUDR have been taken.</p> <p>IBA also has a documented internal grievance review process.</p>	<ul style="list-style-type: none"> We obtained the documented internal grievance review process and inspected for evidence of the grievance process.
Annex II (Due Diligence Statement)		
<p><u>Annex II - Due Diligence Statement</u></p> <p>“Information to be contained in the due diligence statement in accordance with Article 4(2):</p> <p>1. Operator’s name, address and, in the event of relevant commodities and relevant products entering or leaving the market, the Economic Operators Registration and Identification (EORI) number in accordance with Article 9 of Regulation (EU) No 952/2013.</p> <p>2. Harmonised System code, free-text description, including the trade name as well as, where applicable, the full scientific name,</p>	<p>14.1 Objective – DDS in EUIS</p> <p><i>To provide a platform which allows users to submit due diligence statements to the EU information system in respect of parcels of relevant commodities and relevant products that compliant with Annex II.</i></p> <p>Control Procedures:</p> <p>IBA collects and stores identifying information on the operator through the membership onboarding procedure and ICE CoT records the DDS number of previously submitted DDS.</p> <p>The Usage Rules include provisions regarding the acknowledgements made when submitting DDS.</p>	<ul style="list-style-type: none"> We obtained the membership onboarding procedure and inspected for evidence that IBA collects information on the operator. We performed a walkthrough of the ICE CoT Platform and inspected for evidence that ICE CoT records the DDS number of a previously submitted DDS. We obtained the Usage Rules and inspected for evidence that it includes provisions regarding acknowledgements made when submitting DDS. Please also refer to EY’s responses to Article 3(c) and Article 9 above.

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<p><i>and quantity of the relevant product that the operator intends to place on the market or export. For relevant products entering or leaving the market, the quantity is to be expressed in kilograms of net mass and, where applicable, in the supplementary unit set out in Annex I to Regulation (EEC) No 2658/87 against the indicated Harmonised System code or, in all other cases, expressed in net mass specifying a percentage estimate or deviation or, where applicable, volume or number of items. A supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonised System code referred to in the due diligence statement.</i></p> <p><i>3. Country of production and the geolocation of all plots of land where the relevant commodities were produced. For relevant products that contain or have been made using cattle, and for such relevant products that have been fed with relevant products, the geolocation shall refer to all the establishments where the cattle were kept. Where the relevant product contains or has been made using commodities produced in different plots of land, the geolocation of all plots of land shall be included in accordance with Article 9(1), point (d).</i></p> <p><i>4. The text: ‘By submitting this due diligence statement the operator confirms that due diligence in accordance with Regulation (EU) 2023/1115 was carried out and that no or only a negligible risk was found that the relevant products do not comply with Article 3, point (a) or (b), of that Regulation.’</i></p> <p><i>5. Signature in the following format:</i></p> <p><i>‘Signed for and on behalf of:</i></p> <p><i>Date:</i></p> <p><i>Name and function: Signature:.’”</i></p>	<p><i>Please also see responses to Article 3(c) and Article 9 regarding other due diligence information required in the DDS.</i></p>	
<p>Annex III (Simplified declaration of micro and small primary operator)</p>		

EUDR Requirement of Operators and Traders	ICE CoT Control Objectives/Procedures	EY Procedures
<u>Annex III - Simplified declaration of micro and small primary operator</u>	As set out in the Usage Rules, ICE CoT is not at the time of this report supporting the submission of a simplified declaration by micro and small primary operators or the sharing of declaration identifiers.	No matters to report on.