Bloomberg Index Services Limited

Benchmark Statement for

Bloomberg Currency Indices

This benchmark statement (this "Statement") is provided by Bloomberg Index Services Limited ("BISL" and, with its affiliates, "Bloomberg") as the administrator of the Bloomberg Currency Indices (collectively, the "Indices" and each, an "Index") and is intended to meet the requirements of the European Union's regulation on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016, herein the "BMR"), including the regulatory technical standards ("RTS") promulgated thereunder, as and to the extent the EU BMR and related RTS were "on-shored" in the UK from 1 January 2021 (the "BMR").

	Requirement [Regulatory Reference]	Benchmark Family Information
(1)	General disclosure requirements	Data of publication
	The benchmark statement shall state:	Date of publication: 31 October 2019 Date of last update:
	(a) the date of publication of the statement and, where applicable, the date of its last update;	July 22, 2022
	(b) where available, the international securities identification number (ISIN) of the benchmark or benchmarks; alternatively, for a family of benchmarks, the statement may provide details of where the ISINs are publicly accessible free of charge;	Users should be aware that ISINs may have been obtained on the Indices by third parties and, in doing so, such third parties may have supplied inaccurate or incomplete information with regard to the underlying Index or may have obtained multiple ISINs for the same Index. Users should contact BISL if they have questions regarding the proper identification of its Indices. BISL does assign a unique Financial Instrument Global Identifier ("FIGI") to its Indices. FIGIs may be found at https://openfigi.com/ by searching for the relevant Index within the family.
	(c) whether the benchmark, or any benchmark in the family of benchmarks, is determined using contributions of input data;	The Indices do not utilize contributions of input data.

(d) whether the benchmark or any benchmark in the family of benchmarks qualifies as one of the types of benchmarks listed under Title III of Regulation (EU) 2016/1011, including the specific provision by virtue of which the benchmark qualifies as that type.

None of the Indices are 'regulated-data benchmarks', 'interest rate benchmarks' or 'commodity benchmarks' as those terms are defined in the BMR. In addition, none of the Indices are 'critical benchmarks' or 'significant benchmarks' as those terms are defined in the BMR. All of the Indices would be deemed 'non-significant'.

[RTS 1(1)]

(2) The benchmark statement shall clearly and unambiguously define the market or economic reality measured by the benchmark and the circumstances in which such measurement may become unreliable.

[BMR 27(1)(a)]

In defining the market or economic reality, the benchmark statement shall include at least the following information:

(a) a general description of the market or economic reality.

(b) the geographical boundaries, if any, of the market or economic reality;

(c) any other information that

Market or economic reality measured by the benchmark family:

The Bloomberg Currency Indices offer Bloomberg Dollar, Bloomberg British Pound and Bloomberg Euro Indices. The Indices reflect performance against both developed and emerging market currencies that have the highest liquidity in the currency markets and the biggest trade flows with the given country. The Indices have dynamically updated compositions and diversified representations of a breadth of currencies that are important from trade and liquidity perspectives. In this way, the Indices differ from more traditional currency indices that do not update their compositions or are comprised of only a handful of currencies with concentrated weights.

Further breakdowns of sub-components and associated fact sheets may be found here or by entering INP <GO> on the Bloomberg Terminal® and selecting "Fact Sheets".

Participants in the foreign exchange (FX) markets underlying the Indices include central banks and national governments, banks and other financial institutions, corporates engaged in hedging activities and speculative traders. The FX market trades approximately \$5 trillion per day. The US Dollar, Euro and British Pound represent the first, second and fourth largest components of such market on a volume basis.

the administrator reasonably considers to be relevant or useful to help users or potential users of the benchmark to understand the relevant features of the market or economic reality, including at least the following elements insofar as reliable data on these elements is available:

- (i) information on actual or potential participants in the market;
- (ii) an indication of the size of the market or economic reality.

[RTS 1(2)]

In defining the (3)potential limitations of the benchmark and the circumstances in which the measurement of the market or economic reality may become unreliable, the benchmark statement shall

> (a) a description of the circumstances in which the administrator would lack sufficient input data to determine the benchmark in accordance with the methodology;

include at least:

(b) where relevant, a description of

Benchmark limitations:

Though the Indices are designed to be representative of the markets they measure or otherwise align with their stated objective, they may not be representative in every case or achieve their stated objective in all instances. They are designed and calculated strictly to follow the rules detailed in the methodology, and any index level or other output is limited in its usefulness to such design and calculation.

Markets can be volatile, including those market interests which the Indices intend to measure. For example, illiquidity can have an impact on the quality or amount of data available to BISL (or its underlying sources of data) for calculation and may cause the Indices to produce unpredictable or unanticipated results.

In addition, market trends and changes to market structure may render the objective of the Indices unachievable or to become impractical to replicate by investors.

In particular, FX markets are subject to a variety of risks and potential limitations, including the widespread use of leverage in FX trading, political risk associated with governments controlling (or attempting to control) the value of their currencies, appreciation/devaluation risks and interest rate risk.

Other than as set forth in the methodology for the Indices available, there are no minimum liquidity requirements for Index constituents and/or minimum requirements or standards for the quantity or quality of the input data.

For end-of-day pricing levels, if the BFIX is unavailable during market holidays or unforeseen events, currencies in the Indices will be priced by using the prior day's values. On each day prior to publication of such end-of-day pricing levels, Index managers with knowledge of currency instruments review inputs to the index calculations such as pricing, and outputs instances when the accuracy and reliability of the methodology used for determining the benchmark can no longer be ensured, such as when the administrator deems the liquidity in the underlying market as insufficient;

(including error reports), before they are disseminated to clients. This ensures the quality of the Indices and provides a final sign-off of all data by an Index manager before it reaches our clients. For intraday pricing levels, if the BGN is unavailable for a particular currency, currencies in the Bloomberg Currency Indices will be priced using CMFN. For more information on input data (pricing) see row (10) below.

(c) any other information that the administrator reasonably considers to be relevant or useful to help users and potential users to understand the circumstances in which the measurement of the market or economic reality may become unreliable, including a description of what might constitute an exceptional market

[RTS 1(3)]

[....

event.

(4) The benchmark statement shall lay down technical specifications that clearly and unambiguously identify the elements of the calculation of the benchmark in relation to which discretion may be exercised, the criteria applicable to the exercise of such discretion and the position of the persons that can exercise discretion, and how such discretion may be

The Indices are rules-based, and their construction is designed to consistently produce values without the exercise of expert judgment or discretion. Nevertheless, BISL may use expert judgment or discretion with regards to the following:

- Index restatements
- Extraordinary circumstances during a market emergency
- Data interruptions, issues, and closures

When expert judgment or discretion is required, BISL undertakes to be consistent in its application, with recourse to written procedures outlined in the methodology of the Indices and internal procedures manuals. In certain circumstances exercises of expert judgment or discretion are reviewed by senior members of BISL management and Bloomberg Compliance teams, and are reported to the Product, Risk & Oversight Committee (**PROC**), BISL's governance committee, which operates under the supervision of BISL's oversight function, the Benchmark Oversight Committee (**BOC**). BISL also maintains and enforces a code of ethics to prevent conflicts of interest from inappropriately influencing index construction, production, and distribution, including the use of expert judgment or discretion.

subsequently evaluated.

[BMR 27(1)(b)]

In specifying the controls and rules that govern any exercise of judgement or discretion by the administrator or any contributors in calculating the benchmark or benchmarks, the benchmark statement shall include an outline of each step of the process for any ex post evaluation of the use of discretion, together with a clear indication of the position of any person(s) responsible for carrying out the evaluations.

[RTS 1(4)]

(5) A benchmark statement shall contain at least the rationale for adopting the benchmark methodology and procedures for the review and approval of the methodology.

[BMR27(2)(b)]

In specifying the procedures for review of the methodology, the benchmark statement shall at least outline the procedures for public consultation on any material changes to the methodology.

The Indices reflect performance against both developed and emerging market currencies that have the highest liquidity in the currency markets and the biggest trade flows with the given country. The Indices have dynamically updated compositions and diversified representations of a breadth of currencies that are important from trade and liquidity perspectives. In this way, the Indices differ from more traditional currency indices that do not update their compositions or are comprised of only a handful of currencies with concentrated weights.

BISL will review the Indices (both the rules of construction and data inputs) on a periodic basis, not less frequently than annually, to determine whether they continue to reasonably measure the intended underlying market interest, the economic reality or otherwise align with their stated objective. More frequent reviews may result from extreme market events and/or material changes to the applicable underlying market interests.

Criteria for data inputs include reliable delivery and active underlying markets. Whether an applicable market is active depends on whether there are sufficient numbers of transactions (or other indications of price, such as indicative quotes) in the applicable constituents that a price may be supplied for such constituent(s).

Other than as set forth in the Index Methodology, there are no minimum liquidity requirements for Index constituents and/or minimum requirements or standards for the quantity or quality of the input data.

The review will be conducted by product managers of the Indices at least annually or as otherwise appropriate in light of significant market changes or other developments.

[RTS 1(5)]

Any resulting change to the methodology deemed to be material (discussed below) will be subject to the review of the PROC under the oversight of the BOC, each of which committees shall be provided all relevant information and materials it requests relating to the change.

Material changes related to the Indices will be made available in advance to affected stakeholders whose input will be solicited. The stakeholder engagement will set forth the rationale for any proposed changes as well as the timeframe and process for responses. BISL will endeavour to provide at least two weeks for review prior to any material change going into effect. For material changes anticipated to have a significant operational impact on stakeholders, this period may be longer. But in the event of exigent market circumstances, this period may be shorter. Subject to requests for confidentiality, stakeholder feedback and BISL's responses will be made accessible upon reasonable request.

In determining whether a change to an Index is material, the following factors shall be taken into account:

- The economic and financial impact of the change;
- whether the change affects the original purpose of the Index; and/or
- whether the change is consistent with the overall objective of the Index and the underlying market interest it seeks to measure.

In addition to material changes, BISL may from time to time terminate one or more Indices ("Discontinued Indices"), whether due to changes in market structure, a lack of requisite data, insufficient usage, or for other regulatory or practical concerns. The process for terminating such Discontinued Indices is as follows:

The PROC will review proposed terminations, taking into account the reasons for termination, the impact on users (if any), the availability of alternative products and other such factors. If termination is approved, users will be provided as much prior notice as is reasonable under the circumstances, typically 90 days. In the event there is little or no known usage identified, the Discontinued Indices may be terminated with less (or no) notice, as applicable. In the event the Discontinued Indices are licensed for use as the basis of an ETF or other widely-available financial product or is otherwise determined by BISL to be an important benchmark without reasonable substitutes, the notice period may be extended, as warranted. Any advance notice period is subject to BISL being reasonably able to continue administering and calculating such benchmark during such period (for example, BISL has access to requisite data on commercially reasonable terms, is not subject to any litigation or other claims, has adequate internal resources and capabilities, etc.). Terminations and associated user engagement decisions made by the PROC are subject to review by BISL's oversight function, the BOC.

(6) The benchmark statement shall provide notice of the possibility that factors, including external factors beyond the control of the administrator, may necessitate changes to, or the cessation of the benchmark.

Users should be aware that factors, including external factors beyond the control of BISL, may necessitate changes to, or the cessation of the Indices or components thereof. For example, markets measured by the Indices may undergo structural changes which may affect the liquidity of underlying constituents of the Indices. In addition, regulatory changes can adversely impact the effectiveness of methodology design.

[BMR 27(1)(c)]

The benchmark (7) statement shall advise users that changes to, or the cessation of, the benchmark may have an impact upon the financial contracts and financial instruments that reference the benchmark or the measurement of the performance of investment funds.

If financial product issuers or investment managers choose to use one of the Indices as the basis of an index-linked financial product or an investment fund, they should consider the possibility that factors, including external factors, may necessitate changes to, or the cessation of the Indices or components thereof, including the potential need to terminate or modify the terms of a financial product resulting from the termination of the calculation of one or more of the Indices.

[BMR 27(1)(d)]

(8) A benchmark statement shall contain at least the definitions for all key terms relating to the benchmark.

All key terms and other relevant information are set forth in the methodology for the Indices available <u>here</u>.

[BMR 27(2)(a)]

(9) The administrator shall review and, where necessary, update the benchmark statement for each benchmark or family of benchmarks in the event of any changes to the information to be provided under this Article and at least every two years.

BISL shall review this Statement on a periodic basis, at least once every two years, or as otherwise warranted in the event of any material changes to the information provided herein.

[BMR 27(1)]

In addition to the cases referred to in the third subparagraph of Article 27(1) of Regulation (EU) 2016/1011, an update of the benchmark statement shall be required whenever the information

contained in the statement ceases to be correct or sufficiently precise, and including in any event in the following cases:

(a) whenever there is a change in the type of the benchmark;

(b) whenever there is a material change in the methodology used for determining the benchmark or, if the benchmark statement is for a family of benchmarks, in the methodology used for determining any benchmark within the family of benchmarks.

[RTS 6]

(10) A benchmark statement shall contain at least the criteria and procedures used to determine the benchmark, including a description of the input data, the priority given to different types of input data, the minimum data needed to determine a benchmark, the use of any models or methods of extrapolation and any procedure for rebalancing the constituents of a benchmark's index.

[BMR 27(2)(c)]

Constituent Selection

A number of criteria and characteristics are utilized to determine the index eligibility of particular currencies among and across the various Indices, discussed below.

Rebalancing

The Indices are rebalanced annually. For the US Dollar Index, the Euro Index and the Pound Index, the rebalanced target weights are applied after the close of the last trading day in June

At each annual rebalance, the following steps are taken to arrive at the constituent currencies and their weights:

- 1. Identify the top 20 currencies in terms of trading activity versus the underlying currency.
- 2. Identify the top 20 currencies from the Triennial Central Bank Survey of Foreign Exchange and Derivatives Market Activity.
- 3. Build the union of sets of top 10 currencies of both lists after removing currencies pegged to the underlying currency.
- The preliminary index weights are driven by assigning averaging trade weights and liquidity weights to the combined set of currencies.
- 5. The final index weights¹ are derived by:
 - Capping the exposure of Chinese renminbi at 7% for the Bloomberg Dollar Index and 3% for the Euro and the Pound indices, and distributing its weight to other currencies in proportion to the average weight determined in step 4.

b. Removing smaller currency positions, defined as any position that has a weight of less than 2%, and distributing its weight to other currencies in proportion to the average weight determined in step 5.a., above.

¹ Note that Russian Ruble (RUB) is no longer eligible for Bloomberg Currency Index family, and Bloomberg Dollar Inverse Total Return Index (Bloomberg Ticker: BBDXI) is planned to be discontinued on August 26,

Pricing

For end-of-day spot price levels, the New York 4:00 pm BFIX is used to arrive at the closing values. "BFIX" refers to Bloomberg's family of daily currency fixing rates generated throughout the trading day at fixed, half-hourly intervals.

For more information on BFIX and its methodology, see here: http://www.bloomberg.com/notices/content/uploads/sites/3/2016/04/bfix_methodology.pdf.

The intraday price levels for the Indices are determined primarily by using the BGN. More information regarding the BGN, including its inputs and algorithms, is available in the BFIX methodology document linked above.

For greater detail regarding the criteria and procedures used to determine the Indices, please refer to the publicly-available methodology for the Indices available here.

A benchmark statement shall contain at least the controls and rules that govern any exercise of judgement or discretion by the administrator or any contributors, to ensure consistency in the use of such judgement or

[BMR27(2)(d)]

discretion.

For the purpose of providing information on the controls and rules that govern any exercise of judgment or discretion in the calculation of the benchmark or of the family of benchmarks, the benchmark statement shall at least:

The Indices are rules-based, and their construction is designed to consistently produce values without the exercise of expert judgment or discretion. Nevertheless, BISL may use expert judgment or discretion with regards to the following:

- Index restatements
- Extraordinary circumstances during a market emergency
- Data interruptions, issues, and closures

When expert judgment or discretion is required, BISL undertakes to be consistent in its application, with recourse to written procedures outlined in the methodology of the Indices and internal procedures manuals. In certain circumstances exercises of expert judgment or discretion are reviewed by senior members of BISL management and Bloomberg Compliance teams, and are reported to the Product, Risk & Oversight Committee (PROC), BISL's governance committee, which operates under the supervision of BISL's oversight function, the Benchmark Oversight Committee (BOC). BISL also maintains and enforces a code of ethics to prevent conflicts of interest from inappropriately influencing index construction, production, and distribution, including the use of expert judgment or discretion.

(a) indicate the position of each function or body who may exercise discretion;

(b) outline each step of the ex-post evaluation process for the use of discretion.

[RTS 27(1)(4)]

(12) A benchmark statement shall contain at least the procedures which govern the determination of the benchmark in periods of stress or periods where transaction data sources may be insufficient, inaccurate or unreliable and the potential limitations of the benchmark in such periods.

See "Benchmark Limitations" in row (3) above.

[BMR 27(2)(e)]

(13) A benchmark statement shall contain at least the procedures for dealing with errors in input data or in the determination of the benchmark, including when a re-determination of the benchmark is required.

[BMR 27(2)(f)]

To the extent a material error in Index values is uncovered following its publication and dissemination, a notification will be sent to Index clients alerting them of such error and the expected date of a revised publication, if warranted. BISL considers the following factors to determine whether to restate. Not all conditions need to be present to warrant a restatement, and certain factors may be more determinative that others depending on the circumstances of the given error.

- The relative importance of the data field impacted by the error;
- When the error occurred and when it was discovered;
- The number of Indices and sub-Indices affected;
- Whether the impacted Indices are linked to tradable products;
- The magnitude of the error;
- The burden of restatement on client re-processing relative to the impact of the error;
 and
- The impact of the restatement on analytical tools.

(14) A benchmark statement shall contain at least the identification of potential limitations of the benchmark, including its operation in illiquid

See "Benchmark Limitations" in row (3) above.

	or fragmented markets and the possible concentration of inputs.	
	[BMR 27(2)(g)]	
(15)	Specific disclosure requirements for regulated data benchmarks.	Not applicable.
	In addition to the information to be included pursuant to Article 1, for a regulated-data benchmark or, where applicable, family of regulated-data benchmarks, the benchmark statement shall state at least the following in its description of the input data: (a) the sources of the input data used;	
	(b) for each source, the relevant type, as listed in Article 3(1)(24) of Regulation (EU) 2016/1011.	
(16)	Specific disclosure requirements for interest rate benchmarks	Not applicable.
	1. In addition to the information to be included pursuant to Article 1, for an interest rate benchmark or, where applicable, family of interest rate benchmarks, the benchmark	

statement shall include at least the following information:

(a) a reference alerting users to the additional regulatory regime applicable to interest rate benchmarks under Annex I to Regulation (EU) 2016/1011;

(b) a description of the arrangements that have been put in place to comply with that Annex.

[RTS 3]

(17) Specific disclosure requirements for commodity benchmarks

In addition to the information to be included pursuant to Article 1, for a commodity benchmark or, where applicable, family of commodity benchmarks, the benchmark statement shall at least:

(a) indicate whether the requirements of Title II of, or Annex II to, Regulation (EU) 2016/1011 apply to the benchmark, or family of benchmarks as prescribed by Article 19 of that Regulation;

(b) include an explanation as to why Title II of or, as Not applicable.

the case may be, Annex II to that Regulation applies;

(c) include in the definitions of key terms a concise description of the criteria that define the relevant underlying physical commodity;

(d) where applicable, indicate where the explanations are published that the administrator is required to publish under paragraph 7 of Annex II to that Regulation.

[RTS 4]

(18) Specific disclosure requirements for critical benchmarks

In addition to the information to be included pursuant to Article 1, for a critical benchmark, or, where applicable, a family of benchmarks that contains at least one critical benchmark, the benchmark statement shall include at least the following information:

(a) a reference alerting users to the enhanced regulatory regime applicable to critical benchmarks under Regulation (EU) 2016/1011;

(b) a statement indicating how users will be

Not applicable.

informed of any			
delay in the			
publication of the			
benchmark or of			
benchmark or or			
any re-			
determination of			
the benchmark,			
and indicating the			
(expected)			
duration of			
measures.			
[RTS 5]			

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Annex 1 - Climate-Related Disclosures

EXPLANATION OF	F HOW ESG FACTORS ARE REFLECTED IN THE BENCHMARK STATEMENT	
SECTION 1 - CONSIDERATION OF ESG FACTORS		
Item 1 . Name of the benchmark administrator.	Bloomberg Index Services Limited	
Item 2. Type of benchmark or family of benchmarks.	Other Benchmarks	
Item 3 . Name of the benchmark or family of benchmarks.	Bloomberg Currency Indices	
Item 4. Are there in the portfolio of the benchmark administrator any EU Climate Transition Benchmarks, EU Paris-aligned Benchmarks, benchmarks that pursue ESG objectives or benchmarks that take into account ESG factors?	Yes	
Item 5 . Does the benchmark or family of benchmarks pursue ESG objectives?	No	
aggregated level.	onmental, social and governance for each family of benchmarks at an aggregated weighted average value at the level of the family of	
a) List of combined ESG factors:	Details on each ESG factor: N/A	
b) List of environmental factors:	Details on each ESG factor: N/A	
c) List of social factors:	Details on each ESG factor: N/A	
d) List of governance factors:	Details on each ESG factor: N/A	
	ositive, provide below the details (score) for the benchmark or family of factors: combined ESG factors, environmental, social and governance, set concerned.	
administrator included in the benchmark s	e provided in the form of a hyperlink to a website of the benchmark statement. The information on the website shall be easily available and II ensure that information published on their website remains available	
for five years.		
for five years.	disclosed for each constituent of the benchmark, but shall be disclosed to fit the benchmark.	
for five years. The score of the ESG factors shall not be c		

c) List of social factors:	Details on each ESG factor: N/A
d) List of governance factors:	Details on each ESG factor: N/A
Hyperlink to the information on ESG factors for the benchmark or family of benchmarks:	N/A
Item 8. Data and standards used.	
a) Description of data sources used to provide information on the ESG factors in the benchmark statement. Describe how the data used to provide information on the ESG factors in the benchmark statement are sourced and whether, and to what extent, data are estimated or reported.	N/A
b) Reference standards. List the supporting standards used for the reporting under item 6 and/or item 7.	N/A

SECTION 2 - ADDITIONAL DISCLOSURE REQUIREMENTS FOR EU CLIMATE TRANSITION AND EU PARIS-ALIGNED BENCHMARKS

Item 9. Where a benchmark is labelled as 'EU Climate Transition Benchmark' or 'EU Paris-aligned

Benchmark', benchmark administrators shall also disclose the following information:		
a) forward-looking year-on-year decarbonisation trajectory;	N/A	
b) degree to which the IPCC decarbonisation trajectory (1,5°C with no or limited overshoot) has been achieved on average per year since creation;	N/A	
c) overlap between those benchmarks and their investable universe, as defined in Article 1, point (e), of Commission Delegated Regulation (EU) 2020/1818, using the active share at asset level.	N/A	

SECTION 3 - DISCLOSURE OF THE ALIGNMENT WITH THE OBJECTIVES OF THE PARIS **AGREEMENT**

Item 10. By the date of application of this Regulation, for significant equity and bond benchmarks, EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks, benchmark administrators shall, for each benchmark, or where applicable, the family of benchmarks, disclose the following information:

a) Does the benchmark align with the target of reducing carbon emissions or the attainment of the objectives of the Paris Agreement;	No
b) the temperature scenario, in accordance with international standards, used for the alignment with the target of reducing GHG emissions or the attainment of the objectives of the Paris Agreement;	Not applicable. The benchmark is not aligned with the target of reducing carbon emissions or the attainment of the objectives of the Paris Agreement and therefore no temperature scenario is used.
c) the name of the provider of the temperature scenario used for the alignment with the target of reducing GHG emissions or the attainment of the objectives of the Paris Agreement;	Not applicable. There is no temperature scenario provider as no temperature scenario is used.
d) the methodology used for the measurement of the alignment with the temperature scenario;	Not applicable. The benchmark does not use a methodology to measure alignment with a temperature scenario as no temperature scenario is used
e) the hyperlink to the website of the temperature scenario used.	Not applicable. There is no temperature scenario used.

Date on which information has last been updated and reason for the update:	28 January 2022. Update of Section 3 disclosures.

Take the next step.

For additional information, press the <HELP> key twice on the Bloomberg Terminal*.

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