

REFINITIV BENCHMARK SERVICES (UK) LIMITED

CONFLICTS OF INTEREST PUBLIC DISCLOSURE STATEMENT

Introduction

Refinitiv Benchmark Services (UK) Limited (RBSL) administers a number of Benchmarks in accordance with the relevant obligations of the International Organisation of Securities Commissions ("IOSCO") Principles for Financial Benchmarks, the UK Benchmark Regulation ("BMR"), and the Multilateral Instrument 25-102 Designated Benchmarks and Benchmark Administrators ("CSA Rule").

RBSL has in place robust governance arrangements (outlined below) which include a clear organisational structure with well-defined, transparent and consistent roles and responsibilities, to prevent or manage actual or perceived conflicts of interest between the firm, directors, managers, members of staff or any person directly or indirectly linked by control, and contributors or users, and to ensure that, where any expert judgement in the benchmark determination process is required, it is independently and objectively exercised.

All staff within the Refinitiv Group, including those undertaking work on behalf of RBSL, are bound by the [Refinitiv Code of Business Conduct and Ethics](#), which includes policies on organisational and other conflicts of interest. In addition to a Conflicts of Interest policy and procedure, RBSL has other policies and procedures to identify, prevent, manage and mitigate potential conflicts of interest, including:

- Anti-Bribery and Corruption;
- Gifts and Entertainment;
- Hiring and remuneration;
- Whistleblowing;
- Information Security; and
- Compliance Manual

Conflicts of interest management

RBSL monitors its business and operations to identify activities which may cause an actual or perceived conflict of interest. In addition, every member of staff is responsible for identifying, reporting and escalating potential conflicts of interest. This ongoing identification is intended to ensure prevention, management and mitigation of conflicts of interest in order to protect the integrity and independence in the provision of benchmarks.

Any conflict identified is documented and retained within a conflicts of interest register. The RBSL Board and Oversight Committees review the conflicts of interest register on at least an annual basis, or more frequently when a perceived or actual conflict of interest has been identified.

For further information on conflicts relating to WMR, please go to: [WMR COI Public Statement](#).

Governance and oversight

RBSL is a wholly owned subsidiary of Refinitiv Limited. Benchmark administration is the responsibility of RBSL which is managed separately from other businesses owned and operated by Refinitiv Limited. To oversee its business, RBSL operates a three lines of defence risk management framework and has in place a robust governance structure for its benchmark administration activities that includes the Board, Oversight Committees, Risk Committee, as well as dedicated oversight and control functions. Refinitiv Legal & Compliance department members attend all committees providing assurance over RBSL's ongoing regulatory compliance.

RBSL's managers are accountable to the RBSL Board of Directors, themselves subject to the [Refinitiv Code of Business Conduct and Ethics](#) as well as to requirements to manage and disclose conflicts under applicable law.

Benchmark methodologies and statements

RBSL's benchmark methodologies and statements are clearly defined, rules-based and transparent, being publicly available on Refinitiv webpages. The benchmark methodologies are designed to define and minimise expert judgement.

Polices and training

Refinitiv and RBSL requires staff, Oversight Committee members and RBSL Board members, to undertake mandatory compliance training including training on the [Refinitiv Code of Business Conduct and Ethics](#), including conflicts of interest.

Whistleblowing and Confidential Employee Hotline

A dedicated, confidential hotline and reporting portal are available under the [Refinitiv Code of Business Conduct and Ethics](#) for whistleblowing, to enable staff to report any concerns they may have as to an actual or potential breach of the Code, or of laws or regulation.