

REFINITIV & REFINITIV BENCHMARKS SERVICES (UK) LIMITED

WHISTLEBLOWING STATEMENT

October 2021

Refinitiv, an LSEG business, and its wholly owned subsidiary Refinitiv Benchmark Services Limited (RBSL), administer, calculate and distribute Benchmarks across multiple asset classes across global jurisdictions.

The integrity of benchmark data is of supreme importance to multiple stakeholders and more widely the integrity of the financial services industry. The intent of this statement is to encourage any person on any anonymous basis to alert the Refinitiv of conduct that may involve manipulation, or attempted manipulation, of the benchmark(s) RBSL or Refinitiv administers, calculates, and/or publishes.

In order to ensure the integrity of published benchmarks are accurate and generated from reliable, correct data, Refinitiv applies controls, including monitoring, training, and where necessary, investigations.

Importantly, Refinitiv has implemented a whistleblowing process to encourage and facilitate the reporting of any concerns in regard to the integrity of a benchmark and the process for submitting data, administering, calculating and publishing a benchmark. This applies internally to Refinitiv employees, as well as persons outside of Refinitiv who have any concerns or suspicions about the accuracy of data or the behaviour of any person/party connected to the publication and use of benchmark data.

The directors of RBSL and the directors of Refinitiv fully support whistleblowing and are committed to protecting whistleblowers, the important information they provide and more widely, the integrity of the whistleblowing processes within RBSL and Refinitiv. Consequently, all persons who are considering reporting their concerns in good faith can be assured that your concerns will be taken seriously, that confidentiality of reports is maintained to the fullest extent possible and information shared on a need-to-know basis only. In addition, if you are a Refinitiv employee, you will be protected against retaliation.

The commitment Refinitiv has made to this important area of corporate governance includes training. Hence RBSL and Refinitiv do not fear whistleblowing; on the contrary, it is seen as a key control within the corporate governance of business and is designed to protect all stakeholders, including our clients and the communities the benchmark data serves.

Guide to Reporting

There is no prescribed format for filing a whistleblowing report. Rather, Refinitiv encourages those to engage with and report any suspicious activity using the following medium: whistleblowing.benchmarks@refinitiv.com

Please include as much detail in your notification as practicable, including the nature of the suspicion or actual evidence relating to the manipulation of a benchmark. Your privacy and protection is of the utmost importance to Refinitiv.

Refinitiv encourages whistleblowers to provide their identity so that dialogue may ensue and all necessary information sought. However, you may also make a report anonymously via Refinitiv's Code of Business Ethics [site](#).