Zug, November 24, 2020

Results of Market Consultation

Dear Sir and Madam,

STOXX Ltd., the operator of Qontigo's index business and a global provider of innovative and tradable index concepts, announces the results of the market consultation on rule changes to its DAX family of market benchmark indices.

Following the consultation, Qontigo's global index provider STOXX Ltd., has published revised rules for the DAX Selection Indices (DAX, MDAX, SDAX and TecDAX). These rules will now be introduced successively.

The comprehensive changes in the index rules were decided to increase the quality of the DAX indices and to align them with international standards.

The main results on changing the index rulebook are:

- From September 2021, the benchmark index DAX will be expanded by ten members, to a total of 40 constituents. This means that it will cover the largest listed companies in Germany even more comprehensively. In return, the MDAX Index will be reduced from 60 to 50 constituents.

- From December 2020, all future DAX candidates must have a positive EBITDA in their two most recent annual financial statements.

- From March 2021, all companies in the DAX Selection Indices will have the obligation to publish audited annual financial reports and quarterly statements. After a 30-day warning period, an infringement of these requirements will result in the immediate exclusion from the index.

- As a consequence, the obligation to be listed in the Prime Standard of the Frankfurt Stock Exchange will no longer apply; a listing on the Regulated Market will be sufficient. This new rule was introduced to allow the index provider to react faster in case of rule violations.

- Additionally, starting in March 2021, all members of a DAX Selection Index will need to comply with the recommendations of the German Corporate Governance Code with respect to the formation of an audit committee in the supervisory board. For existing members there is a transitional period to maintain continuity in the DAX family; they must comply with these requirements from September 2022.

- From 2021 the DAX index will have a scheduled main review twice a year (March and September). Currently, such a review only takes place in September.

- In order to simplify the rules without foregoing investability, the constituents will be selected by market capitalization only from the September 2021 review onward. The exchange turnover will no longer be part of the ranking process. Instead, constituents will need to fulfil requirements in terms of minimum turnover.

1. CONSULTATION RESPONSE OVERVIEW

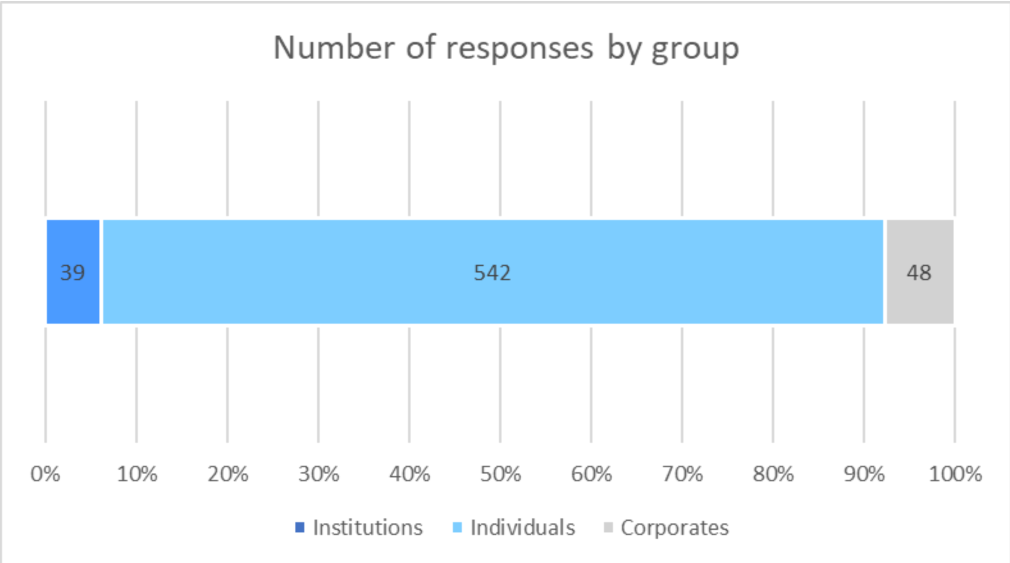
In total STOXX received **629** responses to the market consultation. **208** respondents provided additional comments to be considered. For the purpose of the evaluation STOXX has classified responses in three categories:

Financial Institutions (39): These are responses that are attributable to a financial institution and represent the consolidated view of that institutions. Associations representing financial institutions are also classified into this category. The results include the response of seven financial industry associations.

Individuals (542): These are responses by individuals made on their own behalf regardless of corporate affiliation. Associations representing the interests of individual investors are also classified into this category. The results include the response of two associations representing individual investor interests.

Corporates (48): These are responses that represent the opinion of listed companies from the non-financial sector. Associations representing the interests of (listed) companies are also classified in this category. The results include responses from six associations representing the interests of listed companies.

The responses from associations have initially been included into the overall results per category. In case of ambiguity in the overall answers, these more representative responses have been considered accordingly.



2. DETAILED RESULTS

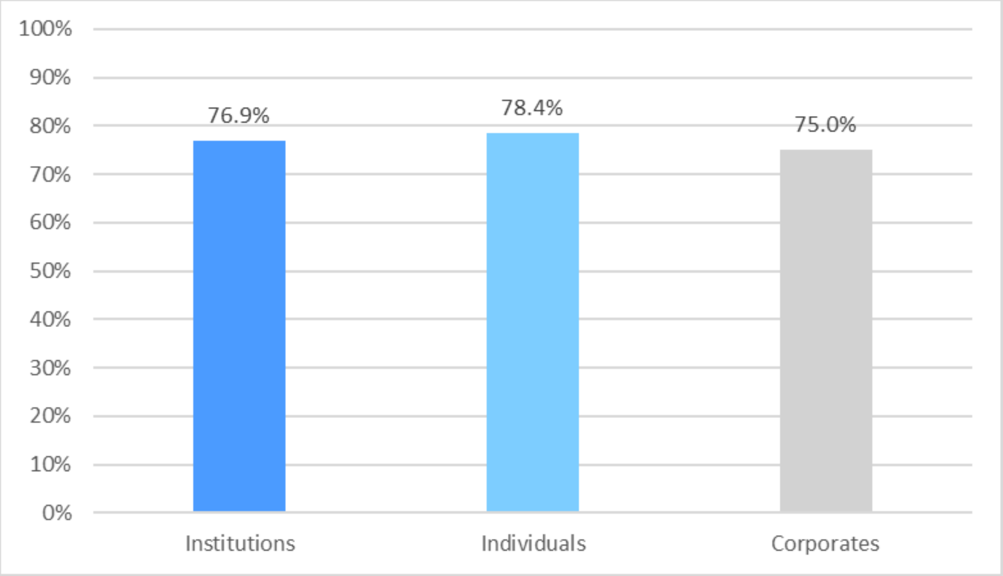
In the following chapters the numerical results are broken down per question asked in the consultation. In addition, a summary of comments along with responses from Qontigo is provided for each element of the consultation.

2.1. CHANGES TO INDEX RULES

The Market Consultation proposed to modify the selection and qualification rules for the headline DAX Selection indices (DAX, MDAX, SDAX and TecDAX) as well as all indices derived from these.

A clear majority of respondents across all three stakeholder groups voted in favour of the overall measures package and hence generally support the rule changes.

Acceptance (overall measures package)



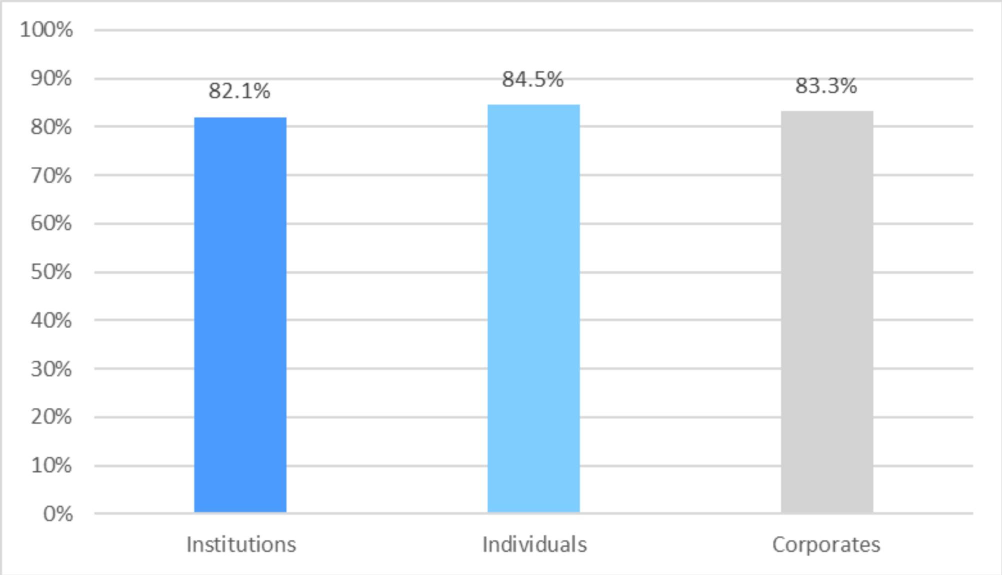
Comments (aggregated)	Qontigo Response
Some respondents have provided substantial feedback on ESG aspects in general. On the one hand answers highlighted that the DAX indices should remain objective fact-based market benchmarks without overlapping ESG aspects). On the other hand, some felt that the proposed integration of ESG criteria did not go far enough,	Qontigo views the DAX index family primarily as a set of objective market benchmarks and will therefore not include ESG aspects into the rulebooks. These criteria shall be considered and continuously expanded in the respective dedicated ESG indices offered by Qontigo.
Some respondents commented that in their view no changes to the index methodology are necessary at all.	The results of the consultation clearly indicate that most respondents across all stakeholder groups generally support the measures.

2.2. OBJECTIONS TO INDIVIDUAL MEASURES

2.2.1. DE-COUPLING OF INDEX RULES FROM PRIME STANDARD LISTING REQUIREMENT

A clear majority across all three stakeholder groups supported this measure.

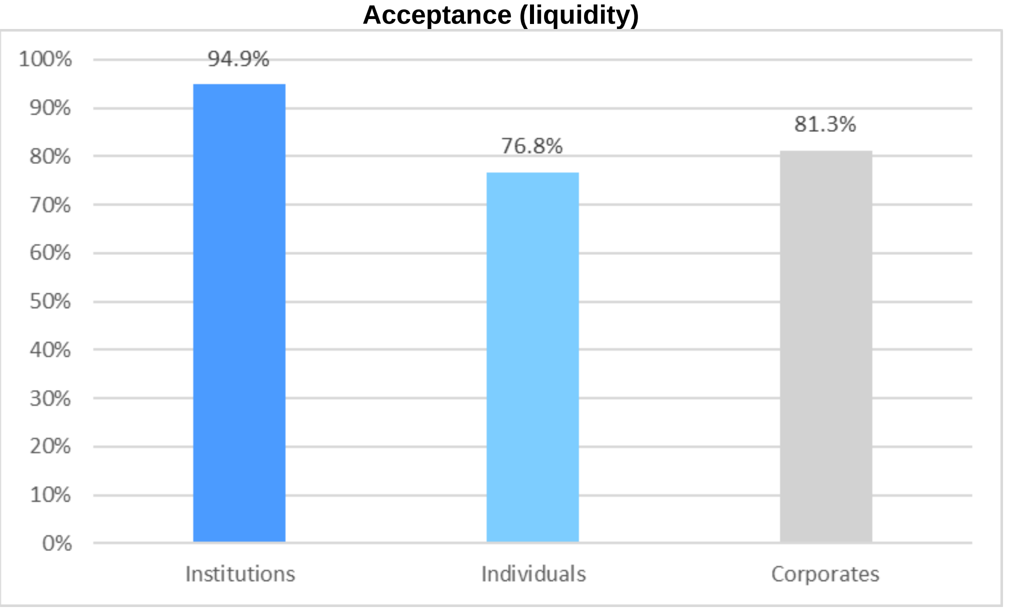
Acceptance (Prime Standard)



Comments (aggregated)	Qontigo Response
Some respondents commented that removing the requirement of a prime standard listing would lead to an undesirable reduction in the quality requirements of the indices.	With the additional introduction of the requirement of the submission of quarterly reports the key additional requirements of the Prime Standard over the General Standard are maintained. At the same time Qontigo can sanction a breach of these rules much faster and independent of the procedures of the Prime Standard.

2.2.2. SELECTION OF INDEX COMPONENTS BY FREE FLOAT MARKET CAPITALIZATION ONLY (REMOVAL OF LIQUIDITY AS A SELECTION CRITERION

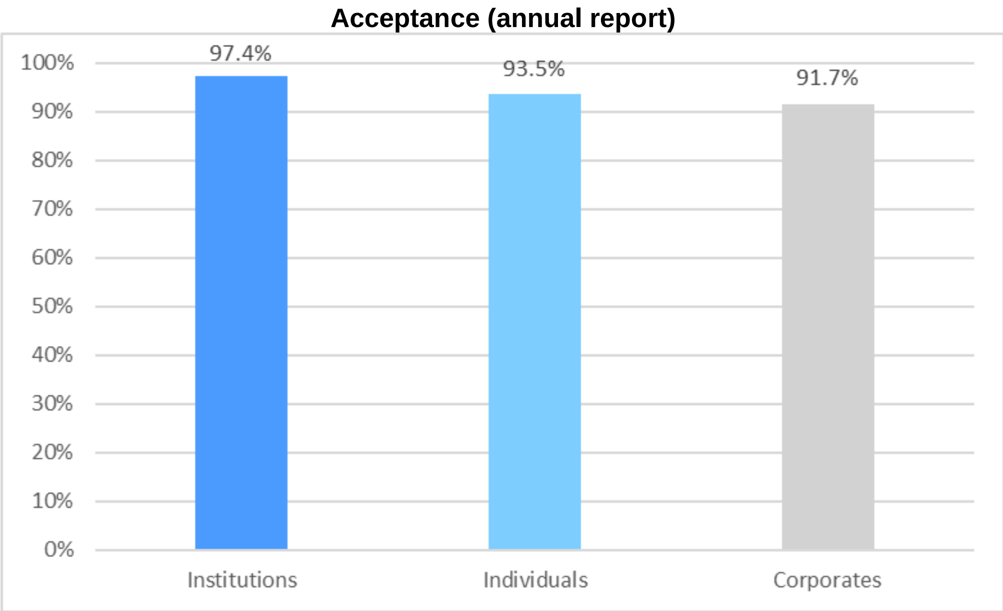
A clear majority across all three stakeholder groups supported this measure.



Comments (aggregated)	Qontigo Response
Some respondents felt that liquidity was an important selection criterion especially for smaller companies and should be retained in order to ensure enough liquidity and representative prices.	Qontigo acknowledges the importance of liquidity for its index products. Due to the high correlation between market capitalization and liquidity Qontigo believes that following international standards and selecting by market capitalization only will in combination with the minimum liquidity criteria ensure sufficient liquidity in the indices.

2.2.3. INTRODUCTION OF REQUIREMENT OF AUDITED ANNUAL REPORTING WITH FAST EXIT IN CASE OF NON-COMPLIANCE.

A clear majority across all three stakeholder groups supported this measure.

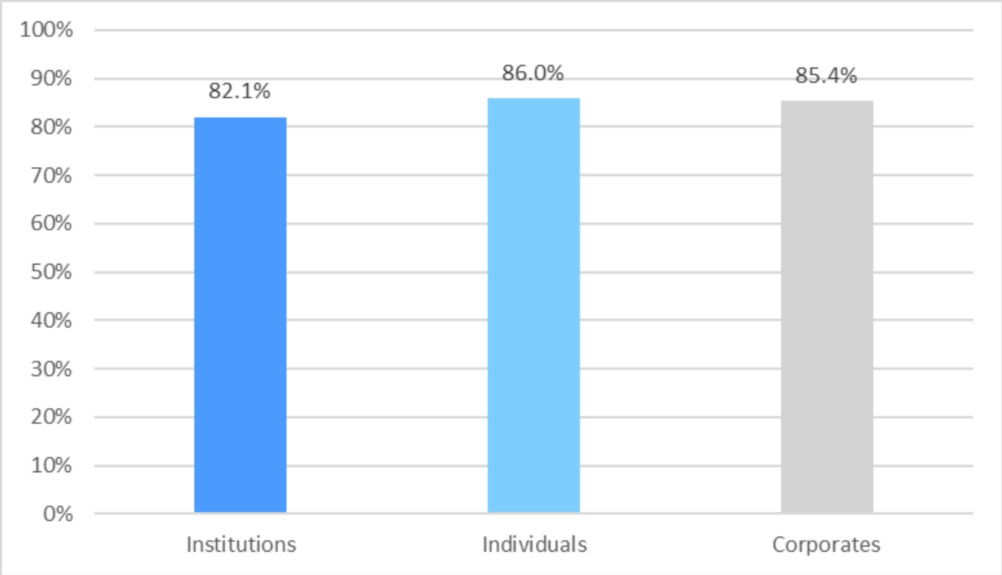


Comments (aggregated)	Qontigo Response
n/a	

2.2.4. INTRODUCTION OF REQUIREMENT OF QUARTERLY REPORTING WITH FAST EXIT IN CASE OF NON-COMPLIANCE.

A clear majority across all three stakeholder groups supported this measure.

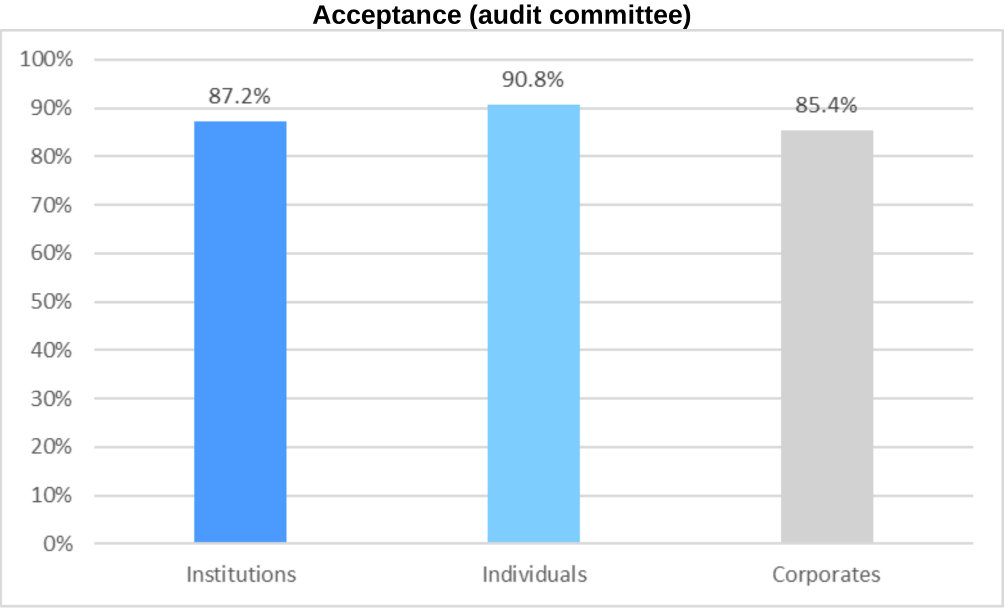
Acceptance (quarterly reporting)



Comments (aggregated)	Qontigo Response
Some respondents felt that a requirement of quarterly reports would foster short-termism in the actions of listed companies and would prefer to focus on annual reports only.	With the introduction of this criterion it is ensured that the quality requirements for index inclusion are not reduced following the removal of a Prime Standard listing requirement.

2.2.5. INTRODUCTION OF REQUIREMENT THAT AUDIT COMMITTEE IN SUPERVISORY BOARD EXISTS AND IS STAFFED.

A clear majority across all three stakeholder groups supported this measure.

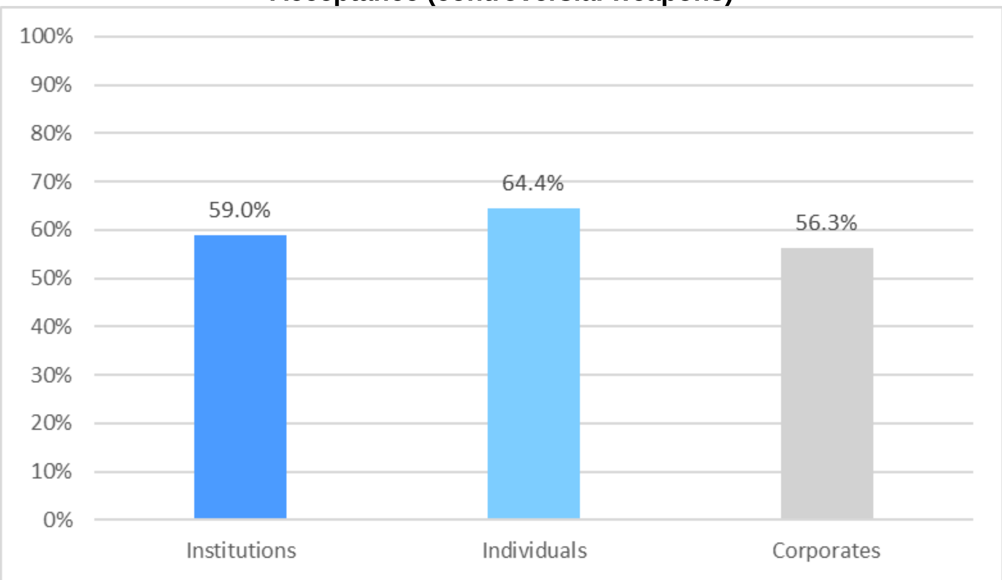


Comments (aggregated)	Qontigo Response
Some respondents asked for an extension of the requirements, specifically to make compliance with the entire German Corporate Governance Code mandatory for index inclusion.	Qontigo acknowledges the role of the German Corporate Governance Code in fostering transparency and good governance by means of the principles, recommendations and suggestions embodied in the Code. Reflecting these standards in the index construction process enhances the quality of the constituents' selection process and builds trust in the market participants. The evolution of index rules must take into consideration the ability of market participants to adapt to the new index requirements on the issuers' side, and the new behavior of the index on the investment side. Qontigo will consider the progressive extension of the index rules to the other aspects of the Code in the future evolutions of the indices.
Some respondents pointed out that the measure should not be applicable to companies in a KGaA structure due to the diminished executive powers of the supervisory board in this setting.	Qontigo acknowledges the special structure of KGaA companies. The implementation of an audit committee is nonetheless considered possible. To ensure sufficient time for current index members to react the measure will apply to current members of the selection indices as of September 2022.

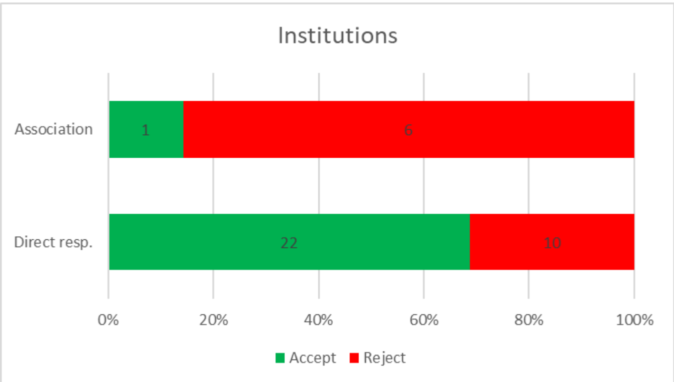
2.2.6. INTRODUCTION OF EXCLUSION OF INVOLVEMENT WITH CONTROVERSIAL WEAPONS

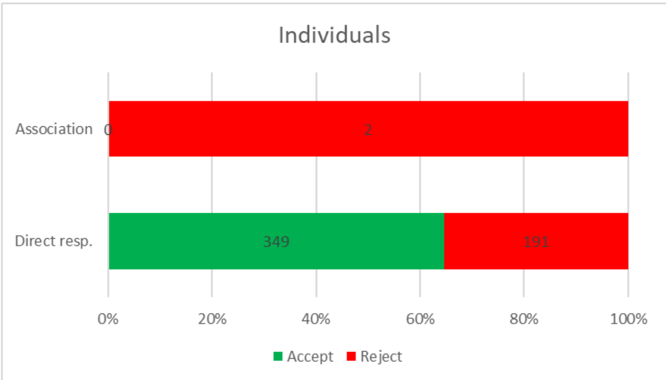
A small majority of respondents support the measure. However, a significant portion of respondents has objected the introduction of the measure. Many respondents have additionally provided further commentary on the inclusion of ESG aspects into the index rulebooks. Especially the criticism of the proposed measures from supporters of ESG criteria as well as the request for a clear separation between mainstream benchmark indices and dedicated ESG benchmarks show that there remains significant need for discussion on scope and integration of ESG criteria in the indices. Qontigo has therefore decided not to implement this measure in the rulebooks of the market benchmark indices.

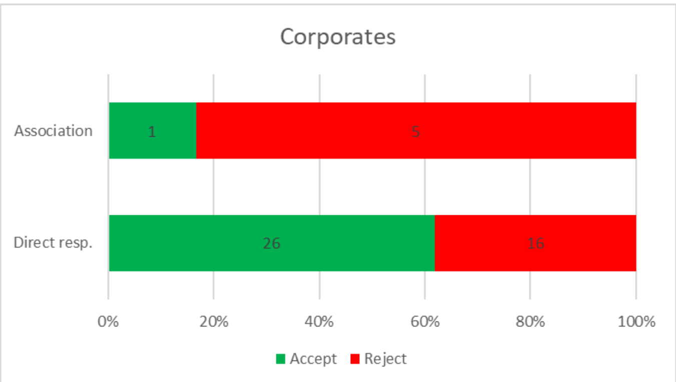
Acceptance (controversial weapons)



Breaking down the results further we note that feedback from associations representing a large membership pool is overwhelmingly negative with regards to the proposed measure, while singular responses tilt slightly towards acceptance of the measure.







Rationale for not implementing the controversial weapons rule

During the consultation and the ongoing dialogue with stakeholders and their representatives Qontigo has been able to collect a very heterogeneous feedback on this measure as well as on ESG criteria in general. After intense deliberations, Qontigo has decided not to implement the controversial weapons rule in its market benchmark indices.

The rejection rate for this measure of up to 40% across the three stakeholder groups is very high. In addition, the majority of responding associations reject the measure on behalf of their numerous members.

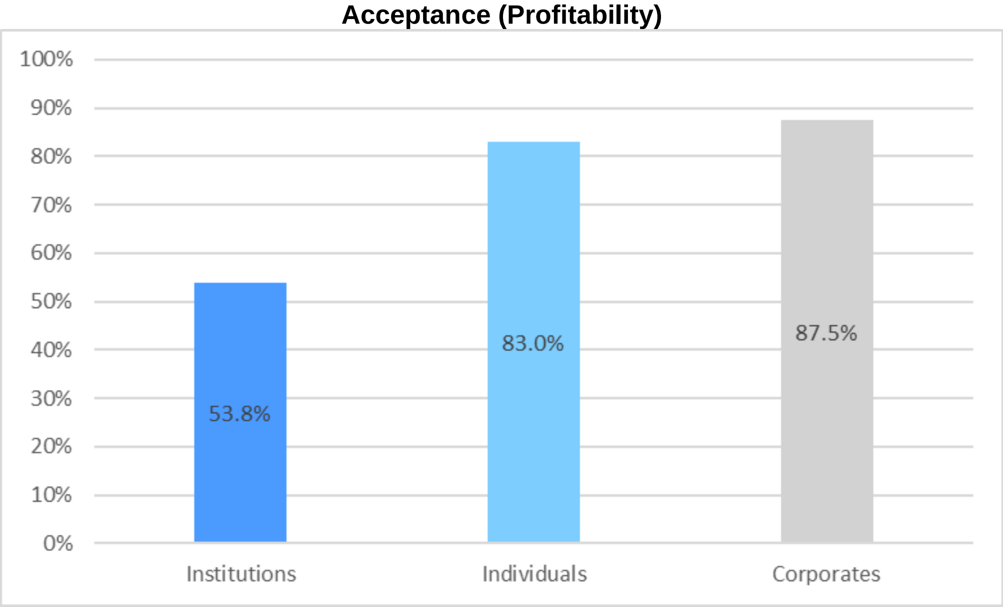
Qontigo therefore does not see sufficient market support for the introduction of a rule that significantly deviates from established norms in market benchmark creation.

The important and relevant proposals on existing and potentially new ESG criteria will become part of a separate intense stakeholder dialogue on the design of the ESG product families offered by Qontigo.

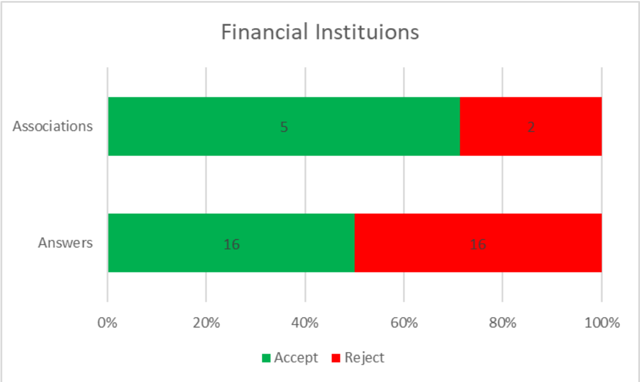
Comments (aggregated)	Qontigo Response
Many respondents commented that ESG criteria should not be considered for the mainstream index rules and that a clear separation between market benchmarks and dedicated ESG indices should be maintained.	Based on the feedback received Qontigo has decided to not implement this criterion. In general, the results of the consultation have shown a very diverse feedback on ESG criteria. The current consultation did not cover all aspects of that discussion. Especially the scope and alignment of ESG index rules between market benchmarks and dedicated ESG benchmarks were not part of this consultation. Here further dialogue with stakeholders remains necessary.
Some respondents remarked that this rule is insufficient and further ESG criteria should be included in for the selection of the components of the indices.	The results of the consultation have shown a very diverse feedback on ESG criteria. The current consultation did not cover all aspects of that discussion. Especially the critical commentary of otherwise ESG supporters show the need for further discussion on scope and integration of ESG criteria in the index families.
Another group of respondents criticised the definition of the term controversial weapons and suggested to limit the exclusion only to those weapons that breach international laws or treaties.	For the consultation Qontigo referenced the controversial weapons definition as published by its partner Sustainalytics. Going forward this topic will also be addressed in a future consultation on ESG topics.

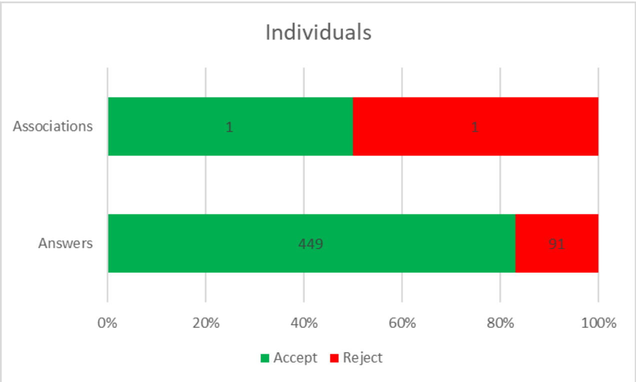
2.2.7. INTRODUCTION OF PROFITABILITY REQUIREMENT

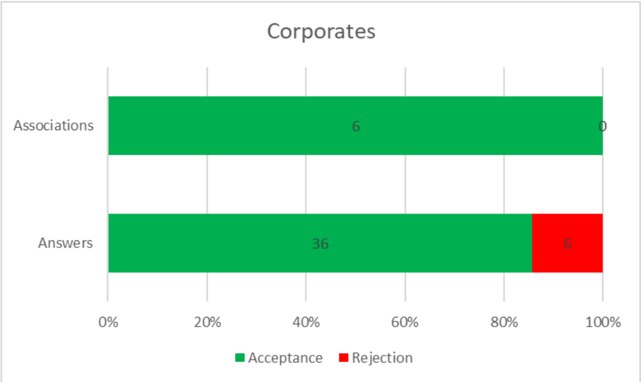
A clear majority of individual and corporate respondents supported this measure. However just under 50% of the institutional respondents did object to the measure.



Breaking down the results further we note that associations in majority support the general introduction of a profitability metric. Some responding associations indicated that they support a profitability metric in general but object to EBITDA as a measure of profitability. We consider those responses as generally in favour of the measure.



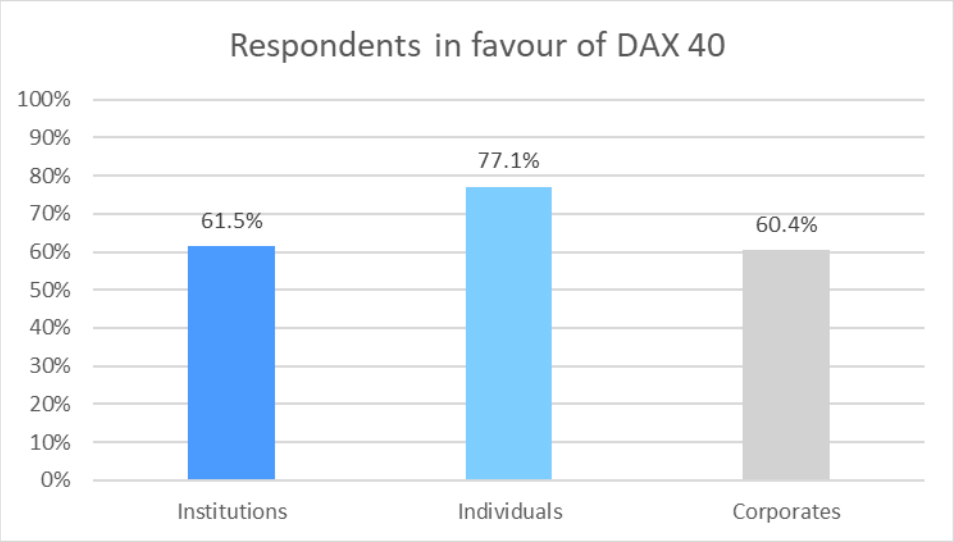




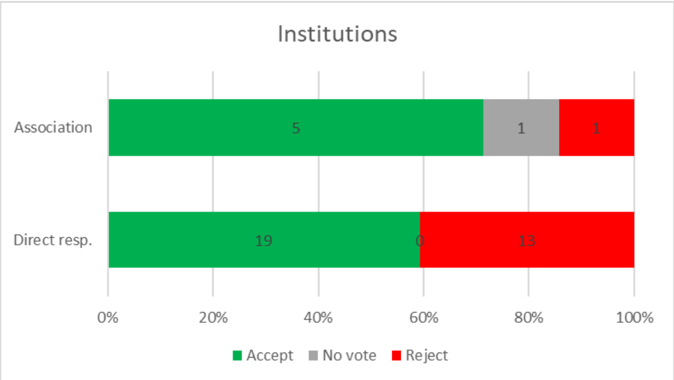
Comments (aggregated)	Qontigo Response
Many respondents commented that EBITDA should not be used to measure profitability. Some suggested to use net income or EBIT instead. Those respondents generally considered EBITDA as not strict enough in order to ensure the inclusion of profitable companies into the index.	The intention of the measure is to provide a basic validation of the viability of the business model. Qontigo understands that some market participants would prefer a tougher measure, however given the heterogeneous feedback on the topic, Qontigo feels that EBITDA is a sufficient measure.
Some respondents commented that the introduction of this rule would deter and punish growth stocks and artificially keep highly valued companies with forward looking business models in the lower indices below the DAX.	The proposal aims to ensure that only companies whose business model has proved to viable at least in the past two years before index inclusion become eligible for DAX. The requirement does not apply to other indices.
Some respondents commented that the rule should be applied regularly and not at time of inclusion only and that companies that are consistently non-profitable should be removed from the indices accordingly.	The intention of the rule is to ensure a viability of the business model before inclusion in the highest index level hence a continuous check is not intended.

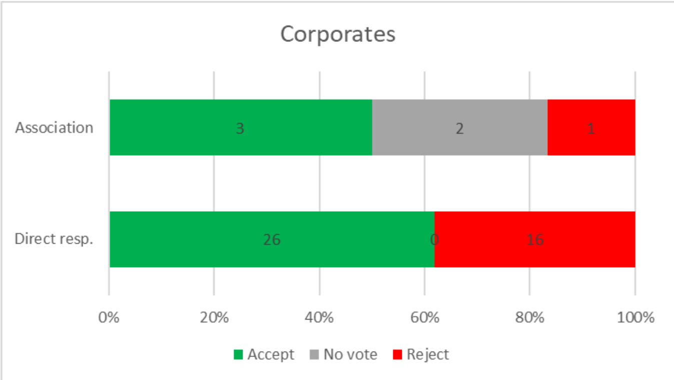
2.3. NUMBER OF CONSTITUENTS OF THE DAX INDICES

Over 60% of respondents in all stakeholder groups prefer an extension of the DAX index to 40 components. The responses to this questions are to be viewed as a direct vote on the two scenarios.



Breaking results down further, the majority of associations for corporates as well as financial institutions also support the measure





Comments (aggregated)	**Qontigo Response**
Many respondents proposed alternative sizing options for the index family. The most common proposal suggested to extend DAX to 40 components but to keep MDAX at 60 components.	A clear majority of respondents did prefer the proposed sizing options. In addition, the liquidity of the MDAX index will be further reduced in this scenario with 60 components in the MDAX.
Some respondents commented that the proposed changes harm the size, liquidity and reputation of the MDAX index and that this negative effect outweighs any benefits for the DAX index.	Qontigo understands and shares the concerns regarding the effects on the MDAX index. Based on the results of the consultation Qontigo has implemented the solution that was supported by the majority of the respondents.
Some respondents remarked that the current DAX 30 already covers a significant portion of the overall market and that an extension to 40 components would give the index more of a Mid-Cap character.	Qontigo believes that the DAX 40 is sufficiently liquid and investable and adequately represents the German blue-chip segment.