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| Subject: | Benchmark Transition |
| Scope: | STOXX Benchmarks |
| Approved by: | Management Board (“ MB ”) |
| Approval date: | 29 March 2023 |
| Responsible department: | Product Development (“ Product ”) – revised by Index Admin. & Gov. |
| Relevant documents: | Terms of Reference – Index Management Committee (“ IMC ”) Terms of Reference – Index Governance Committee (“ IGC ”) Terms of Reference – Oversight Committee (“ OC ”) Terms of Reference – (“ MB ”) |
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1. Background

The regulations of benchmarks in the various jurisdictions and for the various types of regulated entities vary in detail, but the general approach is equivalent in principle. In addition, the various rules and regulations use different language and terminology while content-wise being very similar. As such, this Policy uses a harmonized language, which is to be read in conjunction with the specific (national) legal terminology. The most relevant parts of the legislative framework applicable can be summarized as follows:

- Global:

Administrators of benchmarks need to comply with the requirements of Principle 13 (Transition) of the IOSCO Principles for Financial Benchmarks FR07/13.

- European Union:

Administrators of benchmarks used in the EU need to comply with the requirements of the Regulation (EU) No. 2016/1011 “**EU Benchmark Regulation**” or “**EU BMR**”).

- United Kingdom¹:

Administrators of benchmarks used in the UK need to comply with the requirements of Section 3(1) European Union (Withdrawal) Act 2018 (UK) in conjunction with EU BMR (“**UK BMR**”).

2. Objective and Purpose²

This Policy addresses the requirements with respect to the transition and cessation of a benchmark administered by STOXX Ltd., Zug, Switzerland (“**STOXX**”). For benchmark methodology changes please refer to Changes to Methodology Policy.

¹ After the Brexit with an effective date of 31 January 2020, STOXX needs to register for recognition by FCA under UK BMR with a new filing by the end of 2025; until then, UK market access is ensured according to UK BMR transitional provisions.

² Cases or situations not covered by this policy will be covered by processes in the respective STOXX or DAX Index Guides.

3. Scope

This Policy applies to all benchmarks STOXX administers within the meaning of Art. 3 (1), (5) and (6) EU BMR and any similar or equivalent regime (“**STOXX Benchmarks**”).

4. General Principles

4.1. Decommissioning a Benchmark

Due to changing economic or regulatory realities, market demand or internal product offering strategies, STOXX must continuously evaluate the need for the following:

- Benchmark transition: Launching of a new benchmark that is supposed to replace an old benchmark;
- Benchmark cessation: Permanent discontinuation of the dissemination and publication of a benchmark without offering a replacement. The guidelines for the cessation of a benchmark are defined by the IGC in accordance with the terms of reference.

In general, any STOXX department can identify the need and submit a proposal for the decommissioning of a benchmark to Product. If Product agrees with the need for a cessation according to the above criteria, the IMC must be involved to formally request the cessation of a benchmark.

Before decommissioning a benchmark, STOXX must always determine whether there are any listed financial products or license agreements issued on that benchmark as the underlying.

STOXX will only terminate benchmarks provided that:

- all existing (to STOXX knowledge) commercial customers have been consulted in accordance to STOXX Consultation Policy and usage rights have been terminated or transitioned accordingly.
- consultations with stakeholders performed in accordance to STOXX Consultation Policy have not led to the decision to continue the benchmark.

STOXX must give sufficient notice in order to ensure that all non-commercial stakeholders have sufficient time to adjust accordingly. Where there is no known usage, STOXX shall suspend dissemination of benchmarks on notification of termination.

4.2. Escalation

For STOXX Benchmarks, the IMC is responsible for reviewing and preparing the documentation for the cessation or transition of a benchmark and escalate to the IGC for the decision.

The rationale for the cessation or transition of a benchmark must be documented in the minutes of the relevant committee. The IGC has the right to request a consultation on the proposed changes suggested.

4.3. Public Communication

Product and Operations shall work together to ensure that subscribers or other stakeholders are informed about a cessation or transition of a benchmark at least 3 months in advance, where possible. Shorter notice can be given if previous client consultations occurred or clients are not impacted or in exceptional or urgent cases such as extreme or exceptional market conditions or analogous extraordinary situations. A statement on the website (press release) and email to subscribers or other stakeholder must be issued giving detailed information about the nature and

rationale of the cessation and transition as well as the date on which the benchmark is decommissioned. The press release and email must also inform subscribers or other stakeholders that there will be no replacement of the benchmark and whether STOXX suggests the use of alternative benchmarks.

Where a stakeholder contacts STOXX stating a benchmark is still needed after the announcement of the decommissioning of a benchmark, Product and Sales will liaise with the relevant stakeholder. Product will inform the IGC accordingly.

4.4. Recommendation for Alternative Benchmarks

When discontinuing a benchmark without launching a new one, STOXX may consider whether to recommend using an alternative credible benchmark to the stakeholders but is not obligated to offer an alternative benchmark. Product is responsible for evaluating and proposing such recommendations whereas it must consider such criteria as matching characteristics of the discontinued benchmark, differentials between benchmarks, the extent to which an alternative benchmark meets the needs of stakeholders, whether the alternative benchmark is investable, availability of transparent transaction data, impact on stakeholders and impact of existing legislation.

4.5. Control Framework

The detailed process of "Benchmark Transition" is described in STOXX's Controls Framework ("Benchmark Transition/Cessation").

5. Transition

5.1. Public Consultation

For the transition of a benchmark or benchmark family for which listed financial products are issued in the market, STOXX will perform a market consultation in accordance to STOXX Consultation Policy.

5.2. Launch of a New Benchmark

For the launch of a new benchmark due to transition, the same principles apply as for the development of a new benchmark ("Benchmark Design") as detailed in the Benchmark Design Policy.

6. Cessation

6.1. Benchmark without Listed Financial Products

For the cessation of a benchmark or benchmark family for which, to the knowledge of STOXX, no listed financial products are issued in the market, no consultation is required.

6.2. Benchmark with Listed Financial Products

For the cessation of a benchmark or benchmark family for which listed financial products are issued in the market, STOXX will perform a market consultation in accordance to STOXX Consultation Policy.

6.3. Mandatory administration of a critical benchmark.

If STOXX becomes administrator of a critical benchmark and intends to cease providing such benchmark, STOXX shall: (a) immediately notify the relevant authorities; and (b) within four weeks of such notification submit an assessment of how the benchmark: (i) is to be transitioned to a new administrator; or (ii) is to be ceased to be provided, taking into account the procedure established

in this policy (Article 21 and Article 28(1) of the EU BMR and UK BMR). During the assessment period STOXX shall not cease provision of the benchmark.

7. Review Process

This Policy will be reviewed in accordance with the Policy Management Policy and updated as necessary. The responsibility for the updates is assumed by the Head of Product Development department or a Deputy.

8. Version history

| Policy Version | Approval Date | Author | Reason for Change |
|----------------|-----------------------------|--|--|
| 4.1 | March 29 th 2023 | Inderpal Gujral Index Admin. & Gov | Formalise the concept of suspension of dissemination where there are no known products |