

# ICE Data Indices, LLC Benchmark Statement

Thematic, Smart Beta Index Family
April 2024

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# ICE Data Indices Benchmark Statement

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Name of the benchmark administrator	ICE Data Indices, LLC ("IDI")

### 1. Introduction

ICE Data Indices, LLC ("IDI") is a U.S. subsidiary of Intercontinental Exchange, Inc. ("ICE"), and is the administrator for the indices in the Thematic, Smart Beta Index Family. The full list of indices in the Thematic, Smart Beta Index Family (each, an "Index" and collectively the "Indices") is available on the ICE Index Platform <a href="https://indices.ice.com/">https://indices.ice.com/</a> under Index Finder -> Equity, filtering on the "Benchmark Statement Family" column for "Thematic, Smart Beta Index Family". Users can download the data directly from the Index Finder.

A link to IDI Benchmark Statements is available on the Index Platform and can also be found here: https://www.ice.com/fixed-income-data-services/index-solutions/regulation/benchmark-statements where users can view the list of Index Families and their corresponding Benchmark Statements. The Individual Methodology documents for the Indices are available on the ICE Index Platform by entering the Index ticker into the Index Snapshot. Supplementary documents for the equity indices are also available under the Methodologies Tab -> Equity.

This benchmark statement has been created in accordance with Article 27 of the European Benchmark Regulation ("the EU BMR")<sup>1</sup> which was translated into UK law under the Benchmarks (Amendment and Transitional Provision) (EU Exit) Regulations 2019 ("the UK BMR")<sup>1</sup>,

<sup>&</sup>lt;sup>1</sup> https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R1011&from=EN

<sup>&</sup>lt;sup>1</sup> https://www.legislation.gov.uk/uksi/2019/657/contents/made

and with reference to the supplementary delegated regulation (EU)  $2018/1643^2$  ("RTS 2018/1643") and delegated regulation (EU)  $2020/1816^3$  ("DA 2020/1816"), and (EU)  $2020/1818^4$  ("DA 2020/1818") on the content of benchmark statements.

References in this document to EU Regulations or Directives (including EU BMR and applicable Commission Delegated Regulation) include, in relation to the UK, those Regulations or Directives as they form part of UK domestic law by virtue of the European Union (Withdrawal) Act 2018 or have been implemented in UK domestic law, as appropriate.

IDI has been recognized in the UK as a third country Benchmark Administrator for purposes of Article 32 of the UK BMR with the FCA as the relevant competent authority.

The benchmarks which are available for use by supervised entities in the United Kingdom are published on the FCA register <a href="https://register.fca.org.uk/s/resources#Other\_registers">https://register.fca.org.uk/s/resources#Other\_registers</a>, under Third Country Benchmarks Register.

 $<sup>^2</sup>$  COMMISSION DELEGATED REGULATION (EU) 2018/1643 of 13 July 2018 https://eur-lex.europa.eu/legalcontent/EN/TXT/PDF/?uri=OJ:L:2018:274:FULL&from=EN

<sup>&</sup>lt;sup>3</sup> https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R1816

<sup>&</sup>lt;sup>4</sup> https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020R1818

## 2. Benchmark Statement

	Relevant BMR, Regulatory Techincal Standards ("RTS") or Delegated Act ("DA") provision	Requirement	IDI's Response
1	ISIN	RTS 2018/1643 Art(1)(1)(b)  The benchmark statement shall state: (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;	ISINs are not currently assigned to the benchmarks.
2	Contributions of Input Data	RTS 2018/1643 Art(1)(1)(c)  The benchmark statement shall state: (c) whether the benchmark, or any benchmark in the family of benchmarks, is determined using contributions of input data;	The Thematic, Smart Beta Index Family does not use contributions of input data.
3	Types of Benchmarks	RTS 2018/1643 Art(1)(1)(d)  The benchmark statement shall state: (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)	The Benchmarks in the Thematic, Smart Beta Index Family qualify as regulated data benchmarks, by virtue of point 24(a)(i) of Article 3(1) of the BMR.

		2016/1011, including the specific provision by virtue of which the benchmark qualifies as that type.	The Benchmarks do not qualify as interest rate or commodity benchmarks, or as Climate Transition Benchmarks or Paris-Aligned Benchmarks. <sup>5</sup> The Thematic, Smart Beta Index Family contains only non-significant benchmarks as defined under point (27) of Article 3(1) of the BMR. <sup>6</sup>
4	Economic Reality	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) <sup>7</sup> any other information that 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.	The market or economic reality and the geographic boundaries that an individual benchmark intends to represent is described in the Methodology documents. Methodology documents can be found, free of charge, for a selected Index on the home page of the ICE Index Platform (https://indices.ice.com/) in the Index Snapshot section.  Additional information for the family of benchmarks is provided in the Equity Index Methodology documents which can also be found on the ICE Index Platform, free of charge, under the Equity section of the Methodologies tab.  The circumstances under which market conditions might impair the ability of the index to measure a given market are described in the Limitations section of the Methodology document.  Information on the objectives and the coverage of the Benchmark that takes into account ESG

<sup>&</sup>lt;sup>5</sup> The benchmark statement does not therefore need to disclose the information required by RTS 2018/1643 Articles 3 to 5. <sup>6</sup> As a result, RTS 2018/1643 Article 1(7) provides that the benchmark statement does not need to disclose the information required by Article 1(2)(c), Article 1(3)(b) and (c), and Article 1(4) and (5).

7 Not applicable - the Thematic, Smart Beta Index Family consists of non-significant benchmarks only.

		BMR Art27(1)(a)  The benchmark statement shall: (a) clearly and unambiguously define the market or economic reality measured by the benchmark and the circumstances in which such measurement may become unreliable;	Factors can be found in Section 3 of this statement; in the ESG Disclosure Data Document on the IDI webpage https://www.ice.com/fixed-income-data-services/index-solutions/regulation/benchmark-statements; and in the individual methodology documents.
5	Limitations	BMR Art27(2)(g)  A benchmark statement shall contain at least: (g) the identification of potential limitations of the benchmark, including its operation in illiquid or fragmented markets and the possible concentration of inputs.  RTS 2018/1643 Art(1)(3)(a)	All of the benchmarks within the Thematic, Smart Beta Index Family may be subject to potential limitations, such as a decline in the pool of available eligible securities due to advancements in technology, shifts in demographic spending or the economy of that country, changes in regulation or accounting rules, consolidation in certain sectors or industries, or other factors.
		In defining the 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 include at least: (a) a description of the circumstances in which the administrator would lack sufficient input data to determine the benchmark in accordance with the methodology;	Should the underlying markets transform due to consolidation and technology transformation, the companies included in the benchmarks will adjust and change accordingly. If, as a result of such transformation, the securities that remain are no longer representative of the market the Benchmark is intending to represent, the Benchmark may not be reliable or accurate.
			IDI relies on data from third-party providers, including ESG ratings and data providers, and fundamental data providers (collectively "third-party data providers"), and on their systems, controls and processes to provide data that is representative and accurate. IDI does not control

the way in which those third-party data providers design their methodologies relating to the sourcing of the underlying data or determination of that data - whether that be through the use of models, estimations or directly from the source.

ESG data provided is itself inherently subject to certain limitations, including but not limited to: distortions due to company acquisitions or divestments; unavailable or incomplete company reported data; and use of models that may not take into account or react to unexpected events that materially impact the ESG risk scores or data.

Third-party data providers may also from time to time change their methodology or experience issues with the data which may impact on the quality of data provided to IDI. The index itself may then not remain representative or reliable if the underlying data is inaccurate or not available.

IDI and the third-party data providers, from which IDI sources data, take steps to identify and resolve any issues identified in the data provided.

Other limitations may include the ability of the Benchmark to operate in illiquid or fragmented markets.

IDI also seeks to manage and mitigate these limitations through the Benchmark design, review and oversight process.

# BMR Art27(1)(b) The benchmark statement shall: (b) 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 discretionay be subsequently evaluated; When the calculation of the benchmark in relation to which discretion and the position of the persons that can exercise discretion, and how such discretionay be subsequently evaluated; When the calculation of the benchmark in relation to which discretion and the position of the persons that can exercise discretion, and how such discretionay be subsequently evaluated;

The Methodology document for each index in the Thematic, Smart Beta Index Family describes how the benchmarks are to be calculated.

While IDI mostly relies on input data obtained from its sources, on certain occasions, where decisions relating to the determination of a benchmark are required to maintain the integrity of the values and ensure that the benchmark continues to operate in line with the methodology, IDI may apply Expert Judgment.

Where Expert Judgment is required in a benchmark determination, it may only be applied by suitably experienced and qualified staff members on the IDI team in accordance with the Methodology document. Using their expertise and knowledge, and the information available to them, they will make an assessment of what adjustment would be most appropriate to correctly reflect the benchmark objective.

Ultimately any exercise of Expert Judgment is overseen by the Governance Committee of IDI, which ensures that the published Methodologies have been followed.

7	Factors beyond the control of the administrator	BMR Art27(1)(c)  The benchmark statement shall: (c) 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; and	From time to time, events outside of the control of IDI may occur that may require changes to, or cessation of benchmarks in the Thematic, Smart Beta Index family.  IDI has implemented a Benchmark Cessation Procedure, which is published on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation) and which sets out the steps IDI would take if termination of a benchmark was being considered.  IDI has also published a Consultation Policy which is available on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation) and which sets out the steps IDI would take if a material change was needed in relation to a benchmark in the Thematic, Smart Beta Index family.
8	Impact of changes or cessation	BMR Art27(1)(d)  The benchmark statement shall: (d) 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.	Changes to, or cessation of a 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. Where changes to an index are subject to a consultation, users are encouraged to provide feedback on the proposed change and the impact it may have.  Any users of benchmarks that are to be discontinued are advised to take account of the upcoming cessation and ensure their contractual and other arrangements linked to the benchmarks

			contain appropriate fallback or other arrangements to address the cessation.
			IDI has implemented a Benchmark Cessation Procedure, which is published on the IDI website (https://www.ice.com/fixed-income-data- services/index-solutions/regulation) and which sets out the steps IDI would take if termination of a benchmark was being considered.  IDI has also published a Consultation Policy which is available on the IDI website
			(https://www.ice.com/fixed-income-data- services/index-solutions/regulation) and which sets out the steps IDI would take if a material change was needed in relation to a benchmark in the Thematic, Smart Beta Index family.
9	Key Terms	BMR Art27(2)(a)  A benchmark statement shall contain at least:  (a) the definitions for all key terms relating to the benchmark	All key terms relevant to the Thematic, Smart Beta Index Family are set out in the Methodology document for each benchmark.
10	Rationale for adoption and procedures for review and approval	BMR Art27(2)(b)  A benchmark statement shall contain at least: (b) the rationale for adopting the benchmark methodology and procedures for the review and approval of the methodology;	For each benchmark in the Thematic, Smart Beta Index Family, the Methodology document sets out what they intend to cover and achieve.  The IDI Governance Committee is responsible for overseeing the development, design, issuance and operation of the benchmarks and the respective methodology documents. The IDI Governance Committee Charter is available on the IDI website

			(https://www.ice.com/fixed-income-data-services/index-solutions/regulation ).  IDI has also published a Consultation Policy which is available on the IDI website (https://www.ice.com/fixed-income-data-services/index-solutions/regulation ) and which sets out the steps IDI would take if a material change was needed in relation to a benchmark in the Thematic, Smart Beta Index family.
11	Criteria used to determine the benchmark	BMR Art27(2)(c)  A benchmark statement shall contain at least:  (c) 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;	Equity Index price data is sourced mainly from Regulated Markets or Exchanges, including for the U.S. from the Consolidated Tape System ("CTS") and UTP Trade Data Feed ("UTDF"), and is received via reputable third-party market data feeds, platforms and redistributors.  The ESG benchmarks in the Thematic, Smart Beta Index Family use ESG Risk Scores from Sustainalytics. For more information regarding Sustainalytics' methodologies and procedures, refer to https://www.sustainalytics.com/esg-data  Additional sources of data less commonly used include market data vendors, company announcements, exchange announcements and other official sources.  No priority is given to certain data types in the calculation of the benchmarks in the Thematic, Smart Beta Index Family.  The procedures for determining the benchmarks in the Thematic, Smart Beta Index Family,

			component selection and weighting are described in the individual Methodology documents.
12	Exercise of Judgment or Discretion	BMR Art27(2)(d)  A benchmark statement shall contain at least: (d) 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 discretion;	Where exercise of judgment or discretion is required in a benchmark determination, it may only be applied by suitably experienced and qualified staff members on the IDI team in accordance with the Methodology document. Using their expertise and knowledge, and the information available to them, they will make an assessment of what adjustment would be most appropriate to correctly reflect the benchmark objective.  Ultimately any exercise of Expert Judgment is overseen by the Governance Committee of IDI, which ensures that the published Methodologies have been followed.
13	Periods of Stress	BMR Art27(2)(e)  A benchmark statement shall contain at least:  (e) 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;	Actions taken by IDI for the benchmarks in the Thematic, Smart Beta Index Family in exceptional market conditions are outlined in the Methodology document. IDI retains the right to delay the publication of the benchmark level or suspend the publication of the level of the benchmark if it believes that circumstances prevent its proper calculation. In the event that there is a market-wide event resulting in the complete or partial unavailability of data required for the benchmark calculation, IDI will take guidance from the respective source(s) and address on an event-by-event basis and communicate the action taken to its stakeholders.

14	Errors	BMR Art27(2)(f)  A benchmark statement shall contain at least:  (f) the procedures for dealing with errors in input data or in the determination of the benchmark, including when a redetermination of the benchmark is required; and	Reasonable efforts are made to ensure the correctness and validity of data used in benchmark calculations.  Where errors have occurred in the determination or calculation of a benchmark, the decision to make a restatement will be assessed on a case-by-case basis. Such decision will take account of the significance; impact; age; and scale of the error.  All revisions or issues with the publication of the indices will be communicated to stakeholders during the day through the regular client communication channels. In addition, IDI may also contact clients directly; post a notice on the IDI website; send an email announcement, or use other such forms of communication.
		Specific disclosure requirements for regula	ted-data benchmarks
15	Description of Input Data: Regulated Data Benchmarks	RTS 2018/1643 Art 2  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	The ICE Consolidated Feed and the ICE Pricing & Analytics FundRun product are the primary market data sources for U.S. equity real-time and closing prices respectively for the benchmarks in the Thematic, Smart Beta Index Family - Article 3(1)24(a)(vii) of BMR applies.
Spe	ecific disclosure requ	Article 3(1)(24) of Regulation (EU) 2016/1011  uirements on ESG Factors and how they are reflected.	ed in each benchmark or family of benchmarks

16	ESG Factors Specific d	BMR Art 27(2a)  DA 2020/1816  Specific disclosure requirements on ESG Factors and how they are reflected in the benchmark methodology isclosure requirement on the alignment with the objection.	Other than the benchmark specified in Section 3 of this statement, the Thematic, Smart Beta Index Family does not take into account ESG factors in the index design and does not pursue ESG objectives.
17	Alignment with Paris Agreement	DA 2020/1816  Does the benchmark (or family of benchmarks) align with the target of reducing carbon emissions or the attainment of the objectives of the Paris Agreement.	No
18	Temperature Scenario	DA 2020/1816  The temperature scenario, in accordance with international standards, used for the alignment with the target of reducing GHG emissions or attaining of the objectives of the Paris Agreement;  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.	N/A

# 3. ESG Disclosure - Thematic, Smart Beta Benchmark

EXPLANATION OF HOW ESG FACTORS ARE REFLECTED IN THE BENCHMARK STATEMENT		
Item 1. Name of the benchmark administrator.	ICE Data Indices, LLC	
Item 2. Type of benchmark or family of benchmarks.  Choose the relevant underlying asset from the list provided in  Annex II to Commission Delegated Regulation (EU)2020/1816.	Equity	
Item 3. Name of the benchmark or family of benchmarks.	Thematic, Smart Beta Index Family  Note that only one index in the Thematic, Smart Beta Index Family takes into account ESG factors. This benchmark is:  • ICE Taiwan ESG High Dividend Recovery Target Index (ICTWHDR)	
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 □ No	
Item 5. Does the benchmark or family of benchmarks pursue ESG objectives?	☑ Yes □ No	
Item 6. Where the response to Item 5 is positive, provide below t family of benchmarks at an aggregated level.  The ESG factors shall be disclosed at an aggregated weighted a	he details (score) in relation to the ESG factors listed in Annex II for each verage value at the level of the family of benchmarks.	

Please refer to the rule document for the individual benchmark listed above in Item 3 for more information on selection, weighting and exclusion.
ICE Taiwan ESG High Dividend Recovery Target Index (ICTWHDR)
Securities with a Sustainalytics ESG Risk Score greater than or equal to 30, and securities that do not have an assigned ESG Risk Score are excluded from ICTWHDR. The ESG Risk Scores aggregate a comprehensive list of Environmental, Social and Governance factors. (Exclusion)
see Item 7 for more information on the individual benchmark
N/A
N/A
N/A

**Item 7**. Where the response to Item 5 is positive, provide below the details (score) for each benchmark, in relation to the ESG factors listed in Annex II, depending on the relevant underlying asset concerned.

Alternatively, all of this information may be provided in the form of a hyperlink to a website of the benchmark administrator included in the benchmark statement. The information on the website shall be easily available and accessible. Benchmark administrators shall ensure that information published on their website remains available for five years.

The score of the ESG factors shall not be disclosed for each constituent of the benchmark, but shall be disclosed at an aggregated weighted average value of the benchmark.

a) List of combined ESG factors:

see the ESG disclosures section on https://www.ice.com/fixed-incomedata-services/index-solutions/regulation/benchmark-statements for more information on the individual benchmark.

b) List of environmental factors considered:	see the ESG disclosures section on https://www.ice.com/fixed-income- data-services/index-solutions/regulation/benchmark-statements for more information on the individual benchmark.
c) List of social factors considered:	see the ESG disclosures section on https://www.ice.com/fixed-income- data-services/index-solutions/regulation/benchmark-statements for more information on the individual benchmark
d) List of governance factors considered:	see the ESG disclosures section on https://www.ice.com/fixed-income- data-services/index-solutions/regulation/benchmark-statements for more information on the individual benchmark
Hyperlink to the information on ESG factors for each benchmark:	see the ESG disclosures section on https://www.ice.com/fixed-income- data-services/index-solutions/regulation/benchmark-statements for more information on the individual benchmark
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	For the ESG disclosures, the data used in determining the metrics is sourced from Sustainalytics. Please also refer to the notes in the ESG Disclosures Data document on https://www.ice.com/fixed-income-data-services/index-solutions/regulation/benchmark-statements for links to
factors in the benchmark statement are sourced and whether, and to what extent, data are estimated or reported.	the data sources and for more information on standards used.  The indices source ESG risk scores from Sustainalytics  https://www.sustainalytics.com/esg-data
	The Sustainalytics ESG ratings data includes a set of metrics for each company that quantify exposures to detailed sets of factors that are

classified under the Environmental, Social, and Governance pillars. Those factors are presented as a series of risk scores, which are then combined to provide an overall ESG Risk Score ranging from 1 to 100. The higher the risk score, the greater the risk. For more details on how the ESG Risk Score is applied to constituents in the ESG Indices, and what Risk Score thresholds apply when selecting, excluding and weighting constituents, please refer to the individual methodology documents which can be accessed on the ICE Index Platform (https://indices.ice.com/). (Reported and Modelled). Reference Standards International standards are not generally incorporated as part of the design of these indices. The third-party data sources, however, do apply List the supporting standards used for the reporting under item 6 standards to the derivation of the data that is provided to IDI for use in and/or item 7. the indices. Please also refer to the notes in ESG disclosures document on https://www.ice.com/fixed-income-data-services/indexsolutions/regulation/benchmark-statements for links to the data sources for more information on standards used. Section 2 - Additional Disclosure requirements for Climate Transition and Paris Aligned Benchmarks

	Where a benchmark is labelled as a 'Climate Transition' istrators shall also disclose the following information:	on Benchmark' or 'Paris-aligned Benchmark', benchmark		
a)	forward-looking year-on-year decarbonization trajectory;	N/A		
b)	degree to which the IPCC decarbonization 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 2, point (e), of Commission Delegated Regulation (EU) 2020/1818 (1) using the active share at asset level.			
Specific Disclosure requirement on 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 also disclose the following information. By 31 December 2021, benchmark administrators shall, for each benchmark or, where applicable, each family of benchmarks, disclose the following information:				
,	s the benchmark align with the target of reducing carbon ons or the attainment of the objectives of the Paris nent;	The benchmark ICE Taiwan ESG Dividend Recovery Target Index (ICTWHDR) does not align with the target of reducing carbon emissions or the attainment of the Objectives of the Paris Agreement.		
,	emperature scenario, in accordance with international rds, used for the alignment with the target of reducing	N/A		

	contents.
Date on which information has last been updated and reason for the update:	March 2024 - revised to update disclosures and update and clarify
e) the hyperlink to the website of the temperature scenario used.	N/A
d) the methodology used for the measurement of the alignment with the temperature scenario;	N/A
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;	N/A
GHG emissions or attaining of the objectives of the Paris Agreement;	

### 4. Disclaimer

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ICE Indices is under no obligation to maintain or calculate any Index and may cancel or cease to calculate any Index without notice, subject to applicable regulation and its policies and procedures.

ICE Indices does not assume any obligation or duty to any party in relation to any Index and under no circumstances does ICE Indices assume any relationship of agency or trust or of a fiduciary nature for or with any party. Any calculations or determinations in respect of any Index or any part thereof will be made by ICE Indices in accordance with the terms of its methodology at the relevant time and acting reasonably and in good faith.

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Any available index returns are hypothetical and do not represent the results of actual trading of Investable Products, and as such, do not represent actual past performance and are not indicative of any specific investment. The Content (including any of the output derived from

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