



Benchmark Statement

Citigroup Global Markets Limited

November 2024

Introduction: Benchmark Statement

Citigroup Global Markets Limited (“**CGML**”, and with its affiliates, “**Citi**”) develops, calculates and publishes a range of rules-based investment strategy indices, which may include constituents from commodities, credit, equities and fixed income markets and/or foreign exchange (“**FX**”) (or a combination of such underlying interests), and offers financial products which reference such indices. Such indices may also be licensed for use by third parties.

Citi considers certain of these indices to fall within the definition of a “benchmark” as defined under the United Kingdom regulation on indices used as benchmarks in financial instruments and financial contracts (the “**Benchmark Regulation**”¹) including those referred to in this Benchmark Statement. Where Citi considers certain indices do not fall within this definition, it may nonetheless treat such indices as if they are benchmarks for the purposes of applying the requirements of the Benchmark Regulation, but shall not be obliged to do so.

This document constitutes the applicable Benchmark Statement under Article 27 of the Benchmark Regulation in respect of the benchmarks referred to herein and CGML shall be considered the “administrator” of such benchmarks (as defined in Article 3(1)(6) of the Benchmark Regulation).

Terms used in this document, but not defined in this document, shall have the meanings given to them in the “*Benchmark Administration - Key Terms Document*”.

¹ The Benchmark Regulation is the United Kingdom Benchmarks Regulation. The “**United Kingdom Benchmarks Regulation**” is the European Benchmarks Regulation (as defined in the following sentence), as it forms part of the domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 and as amended pursuant to the Benchmarks (Amendment and Transitional Provision) (EU Exit) Regulations 2019 (SI 2019 No. 657). The “**European Benchmarks Regulation**” is Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EC and Regulation (EU) No 596/2014.

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Section 1: Scope

CGML, in its capacity as Administrator, makes a Benchmark Statement in respect of each family of indices (each such family, a “**Benchmark Family**”) specified in the appendix to this document (the “**Appendix**”).

The Benchmark Statement in respect of each Benchmark Family comprises the statements made in Section 2 of this document, the applicable statements made in respect of such Benchmark Family in the Appendix, the applicable ESG-specific statement made in respect of such Benchmark Family (if relevant), and the closing remarks made in Section 3 of this document.

Each index contained in a Benchmark Family shall be individually referred to as a “benchmark”.

Section 2: Individual Benchmark Statements

2.1: Categorization

The categorization of each benchmark contained in a Benchmark Family is specified in the Appendix.

2.2: Rationale

Each benchmark is a notional rules-based proprietary index developed by CGML as Administrator.

The rationale for adopting the methodology of each benchmark contained in a Benchmark Family is described in the Appendix.

Each benchmark will be used in one or more Index Linked Products entered into by, or issued by, (i) CGML or one of its affiliates; and/or (ii) third parties pursuant to applicable licensing arrangements.

Full information in respect of a benchmark, including a description of the benchmark and the applicable calculation methodology, is set out in the applicable Index Conditions, which shall be made available to potential investors prior to any investment in an Index Linked Product. Particular attention is drawn to the important risk factors and disclaimers contained in such Index Conditions.

Each benchmark methodology has been developed and tested internally by Citi Investment Strategies and the Benchmark Administration Team (BAT). Each benchmark has been reviewed and approved by the Index Oversight Group (IOG) pursuant to a formalized internal process whereby Citi Investment Strategies provides to the Index Oversight Group requisite detail relating to the benchmark including, without limitation, information relating to the objective of the applicable benchmarks, key assumptions and risks associated with such benchmarks, benchmark composition and elements of discretion (where applicable).

The benchmarks may be subject to periodic review. The scope of such review of such benchmarks depends on the nature and size of, and the risk posed by, the relevant benchmarks and factors relevant to the benchmarks including the frequency of any operational items which have been noted, Stakeholder feedback (as the case may be) including complaints (if any), audit findings, matters arising from reviews of third party index advisors, or as may be requested by the Index Oversight Group or otherwise determined appropriate by the Index Calculation Agent.

A review of a benchmark or a Benchmark Family (as the case may be) shall include an assessment as to:

- (i) whether there has been any change in the underlying components or interest referenced by the benchmark, which may mean that such components or interest are no longer adequately represented by the benchmark in the manner originally intended; and
- (ii) whether the benchmark remains fit-for-purpose.

The Index Oversight Group shall oversee any such periodic review and consider the findings following any such periodic review.

2.3: Input data

The benchmarks use input data as a part of the algorithmic benchmark determination process both in relation to rebalancing and reweighting determinations and in relation to the calculation of the daily levels of the benchmarks.

Input data is typically defined by reference to both the source of the data and the time as of which the input data is observed. While the majority of benchmarks specify a single source for each input rather than utilising a hierarchy of input data, a secondary or alternative source may also be specified for a particular input.

The sources of input data used in respect of the applicable algorithmic benchmark determination process are available upon request.

The benchmarks are not determined using contributions of input data.

2.4: Insufficiency of input data

Fluctuations in the level, price, rate or value (as applicable) of the Constituents contained in the benchmark from time to time will directly affect the Index Level. The extent to which fluctuations in the Constituent closing level of a particular Constituent will affect the Index Level will, amongst other things, depend on how the Constituent is used in the benchmark. The benchmark is subject to the risks which arise in the markets for the Constituents whose performance it reflects, including potential illiquidity of such Constituents and the risk of market disruption affecting such Constituents. For example, a price source for determining a foreign exchange rate may become unavailable or an exchange on which an underlying Constituent is traded may close early. The occurrence or existence of a market disruption event may result in the publication of the Index Calculation Agent's good faith estimate of the Index Level (notwithstanding the occurrence of a disruption event) and/or the calculation, publication and dissemination of the benchmark being postponed to a later time than as provided in the Index Conditions.

Further, the overall diversification of the benchmark is potentially limited and may be less diversified than an investment in any fund, investment portfolio or other product which invests in or tracks a diversified investment portfolio, and therefore could experience greater volatility.

2.5: Expert Judgement

Certain events beyond the control of the Administrator, may affect the calculation of the benchmark and the Index Level. Each Index Conditions document relating to a benchmark defines the specific market disruption events that are relevant for the Constituents, along with the corresponding consequences for the benchmark determination process if such an event were to occur. These events may have consequences including:

- (i) making certain adjustments to dates;
- (ii) suspending the calculation, publication and dissemination of the benchmark and the Index Level;
- (iii) making a modification or change to the applicable Index Conditions; and
- (iv) discontinuing and cancelling the benchmark.

CGML may lack sufficient input data to determine the benchmark according to the methodology in the following circumstances:

- (i) where a market event which is not fully anticipated or addressed in the Index Conditions occurs; or
- (ii) where any necessary input data is unavailable or considered by the Index Calculation Agent to be unreliable for any reason.

In such circumstances (after applying any applicable fall-back provision specified in the relevant Index Conditions) Expert Judgement may be used in performing the relevant benchmark determinations. Expert Judgement may also be used by the Index Calculation Agent in relation to corporate actions and similar market events in order to appropriately reflect the commercial objective of the benchmark and market practice in relation to such events. Any such use of Expert Judgement shall be recorded by the Benchmark Administration Team and notified to the Index Oversight Group.

Any exercise of Expert Judgement in non-routine circumstances not specifically identified in the applicable Index Conditions and which could have a material effect on the benchmark shall be escalated to an internal oversight function, the Index Oversight Group, for review and approval in advance wherever possible. The Index Oversight Group fulfils the role of ensuring accountability and providing oversight. The Index Oversight Group will review any such use of Expert Judgement in such extraordinary circumstances and may challenge any other use of Expert Judgement as it deems appropriate.

In all cases, Expert Judgement will be exercised (i) in good faith and in a commercially reasonable manner; (ii) to the extent practicable, reflecting the commercial objective of the relevant benchmark and market practice; and (iii) to the extent practicable, in a manner which promotes consistency in the exercise of Expert Judgement and the making of determinations in respect of the relevant benchmark and other benchmarks administered by CGML.

Although the Administrator and Index Calculation Agent may use Expert Judgement in exercising any discretion, potential investors should be aware that the exercise of any such discretion may have an adverse effect on the Index Level and therefore may have an adverse effect on the value of any Index Linked Product.

The Index Conditions for each benchmark include a summary of certain risk factors and limitations associated with the relevant benchmark including a description of the material conflicts of interest that may exist as a consequence of CGML and its affiliates carrying out multiple roles in connection with benchmarks and Index Linked Products.

2.6: Changes to benchmark methodology

Although CGML indices are governed by a static set of rules that are set out in the relevant Index Conditions and are intended to be comprehensive, it is possible that ambiguities, errors and omissions may occur. CGML will seek to resolve, using Expert Judgement, any such ambiguity, error or omission, and may amend the applicable Index Conditions to reflect the resolution of such ambiguity, error or omission.

In such circumstances, CGML shall follow procedures, which it considers are appropriate and proportionate to the amount and type of Index Linked Products referencing the relevant benchmark which are currently in existence.

In summary, the procedures involve three phases: discovery, planning and execution.

- **Discovery:** The Benchmark Administration Team will endeavour to resolve such ambiguity, error or omission using Expert Judgment and may, in consultation with the Index Oversight Group, propose amendments to the Index Conditions to reflect the resolution of such ambiguity, error or omission. In so doing, CGML shall assess the potential impact such change may have on Stakeholders and may, if deemed by CGML to be appropriate and proportionate to the risk and size of the benchmark, seek to consult with Stakeholders. Any such decision to consult with Stakeholders shall be considered by the Index Oversight Group.
- **Planning:** The Benchmark Administration Team in consultation with the Index Oversight Group shall consider (i) the potential impact on Stakeholders; (ii) whether a change to a benchmark (including,

without limitation, a change to the composition, input data or calculation methodology) is necessary to ensure that the benchmark continues to be fit-for-purpose; and (iii) any feedback received from Stakeholders (as may be deemed appropriate) prior to implementation.

- **Execution:** The Benchmark Administration Team shall be responsible for overseeing and shall consult, as necessary, with the Index Oversight Group on all three phases of the process and shall consult with the Index Oversight Group with regard to any proposed amendment to the relevant Index Conditions and may liaise with other teams within Citi with regard to obtaining Stakeholder feedback.

Approval of the Index Oversight Group is required in connection with any Material Change. Following approval of the Index Oversight Group, CGML shall seek to notify Stakeholders of its determination to amend the Index Conditions. Such notification shall explain the reason for any such change and shall be communicated to Stakeholders where reasonably possible along with the relevant amended and restated Index Conditions.

Potential investors and users of the benchmarks should be aware that any Material Changes to the benchmark may have an adverse effect on any Index Linked Product or on the measurement of the performance of any related investment fund (as the case may be).

2.7: Cessation of a benchmark

In certain extraordinary circumstances, CGML may cease to provide a benchmark (including, without limitation, as a consequence of changes in the underlying Constituents or interest referenced by the benchmark which may mean that such Constituents or interest are no longer adequately represented by the benchmark in the manner originally intended), and in such circumstances, CGML shall follow procedures, which it considers are appropriate and proportionate to the amount and type of Index Linked Products referencing the relevant benchmark which are currently in existence.

In summary, the procedures involve three phases: discovery, planning and execution.

- **Discovery:** CGML shall assess the potential impact a cessation of a benchmark may have on relevant Stakeholders and, if it deems appropriate and proportionate to do so, may seek to consult with Stakeholders. Any such decision to consult with Stakeholders shall be considered by the Index Oversight Group.
- **Planning:** CGML shall take an appropriate and proportionate approach and consider (i) the potential impact on Stakeholders; (ii) any feedback received from Stakeholders (as applicable); (iii) the availability of any alternative benchmark; (iv) the extent to which Stakeholders may wish to transition to an alternative benchmark and, if so, the practicability of maintaining a parallel benchmark in order to accommodate an orderly transition to a new benchmark; (v) the extent to which an alternative benchmark is investable; (vi) the procedures that it shall follow in the event that a suitable alternative cannot be identified; and (vii) timing aspects for the cessation of a benchmark and any transition to an alternative benchmark.
- **Execution:** The Benchmark Administration Team shall be responsible for overseeing and shall consult, as necessary, with the Index Oversight Group on all three phases of the process with regard to any proposal to cease publication of a benchmark and may liaise with other teams within Citi with regard to obtaining Stakeholder feedback. The approval of the Index Oversight Group is required in connection with the cessation of any benchmark. Following approval of the Index Oversight Group, CGML shall provide notice to Stakeholders of its determination to cease publication of a benchmark. Such notification shall be communicated to Stakeholders where reasonably possible.

Potential investors should be aware that any cessation of a benchmark may have an adverse effect on any Index Linked Product or on the measurement of the performance of any related investment fund.

2.8: Correction

If the level, price, rate or value (as applicable) of any Constituent for any time on any day, that is (i) announced by or on behalf of the person or entity responsible for such publication or announcement; and (ii) used for any calculation or determination in respect of the benchmark, is subsequently corrected, and the corrected level, price, rate or value (as applicable) (the **“Corrected Level”**) is published by or on behalf of such person or entity in respect of such Constituent within a specified period set out in the Index Conditions, then such Corrected Level shall be deemed to be the level, price, rate or value (as applicable) for such Constituent for the relevant time on the relevant day. The Index Calculation Agent may, but shall not be obliged to, make appropriate adjustments to the Index Level for such day.

In addition, it is possible that errors in calculations may arise in certain circumstances. Where the corrective course of action is not contemplated by the applicable Index Conditions, the Administrator may, using Expert Judgement, seek to restate the Index Level for each day affected by an error in a calculation. In exercising such Expert Judgement, the Index Calculation Agent will act in good faith and in a commercially reasonable manner which is consistent with the primary objective of the benchmark.

Any decision to correct a published Index Level shall only be taken by the Index Calculation Agent following internal escalation and in consultation with the Index Oversight Group and shall be notified to Stakeholders as soon as reasonably practicable.

Section 3: Closing remarks

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This document constitutes the applicable benchmark statement under Article 27 of the Benchmark Regulation and is provided by CGML for the sole purpose of describing the aspects of the benchmark as required by the Benchmark Regulation. Further information regarding CGML, the benchmarks it administers and this document are available upon request. This document is subject to amendment from time to time.

Nothing in this document constitutes legal, financial or investment advice. For the avoidance of doubt, neither CGML nor any of its affiliates or suppliers, or their directors, officers, employees, representatives, delegates or agents accepts any duty of care or responsibility to the recipient or any other party into whose hands this document may come.

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Appendix: The Benchmark Families

For the purposes of this Appendix:

“**financial instruments**” shall mean the instruments listed in Section C of Annex I to Directive 2014/65/EU.

The Index Conditions for a benchmark which pursues or takes into account ESG objectives (i.e. an ESG benchmark) contain a clear statement that the benchmark does so. If the Index Conditions for a particular benchmark do not contain such a statement, then such benchmark is a non-ESG benchmark, and does not pursue or take into account ESG objectives.

A separate ESG-specific statement (which is to be read in conjunction with this document) is prepared in respect of each ESG benchmark or family of ESG benchmarks (as relevant).

The Index Conditions for a benchmark which is either an EU Climate Transition Benchmark (as defined under Article 3(1)(23a) of the Benchmark Regulation) or an EU Paris-aligned Benchmark (as defined under Article 3(1)(23b) of the Benchmark Regulation) contain a statement identifying the benchmark as such. A benchmark is a non-low carbon benchmark if the applicable Index Conditions do not contain such a statement.

Commodity (Regulated-Data) Indices

“**Commodity (Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of financial instruments referencing a broad range of commodities (soft commodities and hard commodities) that are exchange-traded (“**Constituents**”).^{2 3}

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated commodity markets or sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Commodity (Regulated-Data) Indices are categorized as:

- (i) regulated-data benchmarks; and
- (ii) non-significant benchmarks.

² Certain indices may also make use of benchmarks administered by third parties and which reference commodity underlyings.

³ As a technical matter, Commodity (Regulated-Data) Indices are not commodity benchmarks under the Benchmark Regulation, because they do not reference commodities (instead, they reference financial instruments which in turn reference commodities).

Commodity (Non-Regulated-Data) Indices

“**Commodity (Non-Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of financial instruments referencing a broad range of commodities (soft commodities and hard commodities) that are exchange-traded (“**Constituents**”).^{4 5}

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated commodity markets or sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Commodity (Non-Regulated-Data) Indices are categorized as:

- (i) benchmarks comprising input data that is not considered regulated data,⁶ but nonetheless which are data that are readily available to the Administrator and which are transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers or certain non-EU trading venues; and
- (ii) non-significant benchmarks.

⁴ Certain indices may also make use of benchmarks administered by third parties and which reference commodity underlyings.

⁵ As a technical matter, Commodity (Non-Regulated-Data) Indices are not commodity benchmarks under the Benchmark Regulation, because they do not reference commodities (instead, they reference financial instruments which in turn reference commodities).

⁶ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as Commodity (Non-Regulated-Data) Indices for the purpose of this Benchmark Statement.

Credit Indices

“**Credit Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of credit default swaps selected from one or specified reference indices (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or industry sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Credit Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data,⁷ but nonetheless which are data that are readily available to the Administrator and which are transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers or certain non-EU trading venues; and
- (ii) non-significant benchmarks.

⁷ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as Credit Indices for the purpose of this Benchmark Statement.

Debt Securities (Regulated-Data) Indices

“**Debt Securities (Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of (i) debt securities selected from a specified third party reference index, third party data source or set of exchanges; and/or (ii) financial instruments referencing debt securities that may be exchange-traded and/or observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Debt Securities (Regulated-Data) Indices are categorized as:

- (i) regulated-data benchmarks; and
- (ii) non-significant benchmarks.

Debt Securities (Non-Regulated-Data) Indices

“**Debt Securities (Non-Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of (i) debt securities selected from a specified third party reference index, third party data source or set of exchanges; and/or (ii) financial instruments referencing debt securities that may be exchange-traded and/or observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Debt Securities (Non-Regulated-Data) Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data⁸, but nonetheless which are data that are readily available to the Administrator and which may be (a) determined by Citi in the ordinary course of its business as a dealer (i.e. as a market maker in relevant instruments) for its own valuation purposes and/or for the purposes of its own audited books and records; and/or (b) transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers; and
- (ii) non-significant benchmarks.

⁸ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as Debt Securities (Non-Regulated-Data) Indices for the purpose of this Benchmark Statement.

Equity (Regulated-Data) Indices

“**Equity (Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of (i) globally-listed equities selected from a specified third party reference index or set of exchanges; and/or (ii) financial instruments referencing equities that are exchange-traded (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index.⁹ The Constituents comprised in an index may be selected from one or more designated regions or industry sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Equity (Regulated-Data) Indices are categorized as:

- (i) regulated-data benchmarks; and
- (ii) non-significant benchmarks.

⁹ Note that in limited circumstances, the Index Calculation Agent may, with the intention of assigning weights to applicable Constituents, observe one or more Citi Research reports that are published independently by Citi Research in the ordinary course of its business of producing investment research and economic and market analysis to Citi clients.

Equity (Non-Regulated-Data) Indices

“**Equity (Non-Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of (i) globally-listed equities selected from a specified third party reference index or set of exchanges; and/or (ii) financial instruments referencing equities that are exchange-traded (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or industry sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Equity (Non-Regulated-Data) Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data,¹⁰ but nonetheless which are data that are readily available to the Administrator and which may be (a) determined by Citi in the ordinary course of its business as a dealer (i.e. as a market maker in relevant instruments) for its own valuation purposes and/or for the purposes of its own audited books and records; and/or (b) transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers; and
- (ii) non-significant benchmarks.

¹⁰ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as Equity (Non-Regulated-Data) Indices for the purpose of this Benchmark Statement.

Fund (Regulated-Data) Indices

“**Fund (Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of investment funds (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or investment objectives, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Fund (Regulated-Data) Indices are categorized as:

- (i) regulated-data benchmarks; and
- (ii) non-significant benchmarks.

Fund (Non-Regulated-Data) Indices

“**Fund (Non-Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of investment funds (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or investment objectives, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Fund (Non-Regulated-Data) Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data,¹¹ but nonetheless which are data that are readily available to the Administrator; and
- (ii) non-significant benchmarks.

¹¹ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as Fund (Non-Regulated-Data) Indices for the purpose of this Benchmark Statement.

FX (Regulated-Data) Indices

“**FX (Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of financial instruments referencing a broad range of global foreign currency exchange rates¹² which are observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or countries, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as FX (Regulated-Data) Indices are categorized as:

- (i) regulated-data benchmarks; and
- (ii) non-significant benchmarks.

¹² Certain indices may also make use of benchmarks administered by third parties and which reference foreign currency exchange rates.

FX (Non-Regulated-Data) Indices

“**FX (Non-Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of financial instruments referencing a broad range of global foreign currency exchange rates¹³ which are observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or industry sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as FX (Non-Regulated-Data) Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data,¹⁴ but nonetheless which are data that are readily available to the Administrator and which may be (a) determined by Citi in the ordinary course of its business as a dealer (i.e. as a market maker in relevant instruments) for its own valuation purposes and/or for the purposes of its own audited books and records; and/or (b) transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers; and
- (ii) non-significant benchmarks.

¹³ Certain indices may also make use of third party administered benchmarks referencing foreign currency exchange rates.

¹⁴ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as FX (Non-Regulated-Data) Indices for the purpose of this Benchmark Statement.

Multi-Asset (Regulated-Data) Indices

“**Multi-Asset (Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of (i) a broad range of multi-asset underlyings (commodities, exchange-traded funds, equities, foreign currency exchange rates, and interest rates) selected from a specified third party reference index or set of exchanges; and/or (ii) financial instruments referencing such multi-asset underlyings that may be exchange-traded and/or observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated asset classes or sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Multi-Asset (Regulated-Data) Indices are categorized as:

- (i) regulated-data benchmarks; and
- (ii) non-significant benchmarks.

Multi-Asset (Non-Regulated-Data) Indices

“**Multi-Asset (Non-Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of (i) a broad range of multi-asset underlyings (commodities, exchange-traded funds, equities, foreign currency exchange rates, and interest rates) selected from a specified third party reference index or set of exchanges; and/or (ii) financial instruments referencing such multi-asset underlyings that may be exchange-traded and/or observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated asset classes or sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Multi-Asset (Non-Regulated-Data) Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data,¹⁵ but nonetheless which are data that are readily available to the Administrator and which may be (a) determined by Citi in the ordinary course of its business as a dealer (i.e. as a market maker in relevant instruments) for its own valuation purposes and/or for the purposes of its own audited books and records; and/or (b) transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers or non-EU trading venues; and
- (ii) non-significant benchmarks.

¹⁵ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as Multi-Asset (Non-Regulated-Data) Indices for the purpose of this Benchmark Statement.

Rates (Regulated-Data) Indices

“**Rates (Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of financial instruments referencing a broad range of global interest rates and/or treasury bonds that may be exchange-traded and/or observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or countries, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Rates (Regulated-Data) Indices are categorized as:

- (i) regulated-data benchmarks; and
- (ii) non-significant benchmarks.

Rates (Non-Regulated-Data) Indices

“**Rates (Non-Regulated-Data) Indices**” shall mean each index the rationale of which is to adopt a methodology, in order to create a quantitative investable index, which tracks the weighted performance of a number of financial instruments referencing a broad range of global interest rates and/or treasury bonds that may be exchange-traded and/or observable from accessible publication arrangements (“**Constituents**”).

The selection and weighting of Constituents is determined periodically by CGML in accordance with a defined index objective or theme and based on pre-determined criteria or filters, which may seek to evaluate or modify the risk and return profile of notional allocations of Constituents to the applicable index. The Constituents comprised in an index may be selected from one or more designated regions or industry sectors, and/or filtered according to the features of the Constituents.

The benchmarks which are classified as Rates (Non-Regulated-Data) Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data,¹⁶ but nonetheless which are data that are readily available to the Administrator and which may be (a) determined by Citi in the ordinary course of its business as a dealer (i.e. as a market maker in relevant instruments) for its own valuation purposes and/or for the purposes of its own audited books and records; and/or (b) transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers; and
- (ii) non-significant benchmarks.

¹⁶ Note that benchmarks which comprise a combination of both regulated data and other types of input data, that are not considered regulated data but which are readily available to the Administrator, have been categorised as Rates (Non-Regulated-Data) Indices for the purpose of this Benchmark Statement.

TRY Implied Rate Indices

“**TRY Implied Rate Indices**” shall mean each index the rationale of which is to adopt a methodology in order to create a Turkish Lira (“**TRY**”) 3-month interest rate, which is implied by market data that are formed through the competitive process of supply and demand, including in the market for spot and forward foreign currency exchange transactions in TRY and the U.S. Dollar (“**USD**”).

Each TRY Implied Rate Index is not designed to reflect an investment strategy. Instead, each TRY Implied Rate Index aims to reflect (on each day in which it is determined) the levels, prices, rates and values in the relevant markets that it represents. The level of a TRY Implied Rate Index is determined with reference to a number of factors: (i) the spot foreign currency exchange rate (for the conversion of amounts denominated in USD into TRY) that is published by an established market data vendor; (ii) a benchmark USD 3-month interest rate that is published by an established market data vendor; and (iii) bids and offers for FX swaps, for 3-month forward foreign exchange transactions (for the forward sale of TRY against USD), that are quoted by a specified number of market participants and published by an established market data vendor.

The benchmarks which are classified as TRY Implied Rate Indices are categorized as:

- (i) benchmarks comprising input data that are not considered regulated data, but nonetheless which are data that are readily available to the Administrator and which may be (a) determined by Citi in the ordinary course of its business as a dealer (i.e. as a market maker in relevant instruments) for its own valuation purposes and/or for the purposes of its own audited books and records; and/or (b) transaction data (including reported transactions, quoted prices, and committed quotes) observed from third party data providers or certain non-EU trading venues; and
- (ii) non-significant benchmarks.