



Compliance Statement

Administrator:

Euronext Lisbon

Full name: Euronext Lisbon - SGMR, SA

Relevant National Competent Authority:
CMVM

Version notes

latest version 01-jan-2026*

Version	Version notes
April 2019	Initial version
February 2020	Updated version including all new indices since initial version
August 2021	Discontinuation of PSIH D
March 2022	PSI 20 renamed to PSI
January 2026	Change in accordance with new BMR (EU) 2025/914

Note: addition of indices does not lead to a new version of this statement. The list will be kept up to date. The most recent update of the list was issued January 2026. Only changes in significant indices and cessations of indices are marked as new version of the Compliance statement.

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For further information in relation to Euronext Indices please contact:

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1. INTRODUCTION

Compliance statement under Regulation (EU) 2025/914

Euronext NV operates via its wholly owned subsidiaries Euronext Amsterdam N.V.(Euronext Amsterdam), Euronext Brussels S.A/N.V (Euronext Brussels), Euronext Lisbon – SGMR, SA (Euronext Lisbon), Euronext Paris S.A (Euronext Paris), The Irish Stock Exchange plc (Euronext Dublin) and Oslo Børs ASA (Oslo Børs) (collectively the “Benchmark Administrators” and individually the “Administrator”) a leading benchmark and strategy index franchise that measures different segments of the Euronext and other global markets, including AEX®, BEL 20®, CAC 40®, ISEQ® and PSI®. Euronext has a long standing major interest in the management of benchmarks and indexes.

Overview of Documents relating to Euronext Indices

The following documents should be read in conjunction with this document or provide other relevant information for the reader:

- Benchmark Statement
- Compliance Statement
- Governance Euronext Indices
- Rulebook of each Family Of Indices
- Procedures Euronext Indices
- Rules Of Procedure Independent Supervisors
- Benchmark Oversight Committee Charter
- List of Indices

All of these documents are available on or via the following link:

<https://live.euronext.com/products-indices/index-rules>

BENCHMARK STATEMENT

The Benchmark Statement identifies the primary features of an index family or families of indices in the context of the EU Benchmark regulation.

COMPLIANCE STATEMENT

The Compliance Statement provides details, for both significant and non-significant benchmarks, which provisions the administrator has chosen not to apply, and offers an explanation as to why it is appropriate not to apply each provision.

RULEBOOK OF EACH FAMILY OF INDICES

Each index is part of an index family that shares the basis for selection (universe) and which is managed in a comparable way. A separate rulebook is provided for each index family that will describe the specific features of that index family as well as specific elements of each index within that family.

The rulebooks include also the methodology section which includes all aspects that apply for :

- periodical reviews,
- the calculation, and
- treatment of corporate actions.

PROCEDURES

The procedures describe the various policies that are applied in various situations for all Euronext indices:

- Correction Policy
- Announcement Policy
- Complaints Procedure
- Index Changes and Cessation Procedure

RULES OF PROCEDURE INDEPENDENT SUPERVISORS

For each Independent Supervisor Euronext publishes a 'Rule of Procedure' that describes the responsibilities and composition of each Independent Supervisor.

BENCHMARK OVERSIGHT COMMITTEE CHARTER

The Benchmark Oversight Committee Charter describes the role and responsibilities of the Benchmark Oversight Committee.

LIST OF INDICES PER BENCHMARK FAMILY

An overview of all indices provided by Euronext Indices with identification of their respective administrator and regulator. The list provides all reference information, identifies the status of each benchmark and contains links to the relevant index family rulebooks.

2. Significant, PAB, and CTB Benchmarks

The following section includes:

- The significant benchmark in respect of which provisions do not apply;
- The provision that the administrator has chosen not to apply;
- An explanation as to why it is appropriate not to apply each provision

Each section should be completed for any identified group of significant benchmarks provided by the administrator in respect of which:

- The same provisions are not complied with;
- The same explanations for non-compliance apply

Euronext Lisbon chooses not to apply the following provisions of Regulation (EU) 2025/914 with respect to its significant benchmarks listed in Chapter 4.

The benchmark statement(s) and relevant Rule books are published here:

<https://live.euronext.com/products-indices/index-rules>

Article 4(2):

The provision of a benchmark shall be operationally separated from any part of an administrator's business that may create an actual or potential conflict of interest.

Positioning of Euronext benchmark business in the Euronext group

1. Euronext management might be involved in index management as well as in other departments, such as the Listing department.
2. The Independent Supervisor is chaired by a Euronext representative i.e. the country relevant CEO.

Rationale for exemption foreseen in BMR provision 25:

With respect of the potential conflicts of interest that might arise, mitigation means are implemented.

1. The Benchmark Oversight Committee (BOC) implemented an approach whereby any problematic matters identified are addressed urgently outside the periodic review cycle of indices.
2. The existing decision process to admit or exclude components of the main indices is carried out by the Independent Supervisor which voting members are not employed by Euronext or its affiliates.
3. Managing Board members are excluded from the voting process of the Independent Supervisor.

4. The publicly available Rules of procedure for the Independent Supervisor Committee include the following sections:
 - a. Members of the Independent Supervisor shall avoid any conflicts of interest between the work related to Euronext's indices and their own direct or indirect personal or material interests. Each member shall immediately report any potential or actual conflict of interest to Euronext.
 - b. In cases where Euronext establishes that a potential or actual conflict of interest exists, it may take appropriate action against the relevant Independent Supervisor member(s), including but not limited to restriction of voting rights, suspension or dismissal.
 - c. Independent Supervisor Committee's minutes shall record reported conflicts of interest and related actions or measures.
5. The recruiting process of new external members of the Independent Supervisor includes a training session with Compliance and upfront reporting of potential conflicts.
6. Rules for attendees to the Independent Supervisor meetings:
 - a. **Guests/Experts:** Guests/Experts invited to the Independent Supervisor Committee have no advocacy role for issuers and shall refrain to suggest directly or indirectly arbitrage between issuers.
 - b. **Embargo period:** Guests/Experts shall not discuss with Independent Supervisor's members during the 5 days prior to the meeting.
 - c. **Embargo period for issuers:** Chairmen, guests and experts shall not take any position regarding Index topic nor give any suggestion or supplementary information to issuers on an on-going basis and must refrain to discuss Index topics with issuers during 5 days prior to the meeting.
 - d. **Segregation of operational teams:** Operational teams that manage the Benchmark do not report to the Listing head and are bound by the confidentiality principle enforced across the Group "need to know principle". "Need to know principle" means that topics concerning indices and issuers cases shall be kept by employees and concerned teams and not be discussed with other employees or third parties.
7. Index Operations manages the day-to-day of the index and prepares the decisions of the Independent Supervisor Committee. This team belongs to Market Services division and Index design team belongs to the Capital Markets & Data Solutions division.

3. List of Significant, PAB, and CTB Benchmarks

Significant indices

Index Family	ISIN Code	Mnemo	Index name
PSI	PTING0200002	PSI20	PSI
PSI	PTING0210001	PSITR	PSI GR
PSI	QS0011211180	PSINR	PSI NR

PAB and CTB indices

Index Family	ISIN Code	Mnemo	Index name
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