

# Compliance Statement

Administrator:

**Oslo Børs**

Full name: Oslo Børs ASA

Relevant National Competent Authority:  
Financial Supervisory Authority of Norway (Finanstilsynet)



## Version notes

latest version March 2021

<u>Version</u>	<u>Version notes</u>
March 2021	Initial version.

Note: addition of indices does not lead to a new version of this statement. The lists will be kept up to date. The most recent update of the list was issued 23-Mar-2021. Only changes in significant indices and cessations of indices are marked as new version of the Compliance statement.

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## 1. INTRODUCTION

Compliance statement under Article 25 (7) of Regulation (EU) 2016/1011

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 20®. 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
- Consultations Procedure
- Procedure for Cessation of Indices

**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. Non-Significant Benchmarks

*The following section includes:*

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

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

- The same provisions are not complied with, and
- The same explanations for non-compliance apply.

*Oslo Børs chooses not to apply the following provisions of Regulation (EU) 2016/1011 with respect to its non-significant benchmarks listed in Chapter 3.*

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 section:
  - 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: Guests/Experts:
7. 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.
8. Embargo period: Guests/Experts shall not discuss with Independent Supervisor's members during the 5 days prior to the meeting.
9. 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.
10. 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.
11. Index Operations manages the day-to-day of the index and prepares the decisions of the Independent Supervisor Committee. This team belongs to Market Surveillance division and Index design team belongs to the Global sales division.

**Article 4 (8):**

"An administrator shall establish specific internal control procedures to ensure the integrity and reliability of the employee or person determining the benchmark, including at least internal sign-off by management before the dissemination of the benchmark."

**Rationale for Article 4 (8):**

Sign-off before the dissemination by management is part of the responsibilities by the Management Body for all significant benchmarks. The sign-off before dissemination of non-

significant benchmarks is performed by the associated Independent Supervisor if one exists. If there is no independent Supervisor, the head of Index Design is responsible for the sign-off before dissemination.

#### **Article 5 (3) (a) to (b):**

5 (3): “The oversight function shall operate with integrity and shall have the following responsibilities, which shall be adjusted by the administrator based on the complexity, use and vulnerability of the benchmark:

- (a) reviewing the benchmark's definition and methodology at least annually;
- (b) overseeing any changes to the benchmark methodology and being able to request the administrator to consult on such changes;

Rationale Article 5 (3) (a) to (b):

5 (3) (a) Non-significant Benchmarks with known AUM are reviewed at a minimum each year. In addition, for non-significant benchmarks of which the known AUM is zero (0), the Oversight committee implemented a risk based approach to ensure that any problematic matters are addressed in a timely manner whilst allowing all such benchmarks to be reviewed periodically. This approach is based on the following reasons: the non-significant benchmarks are not vulnerable to manipulation as they are based on publicly available data which do not use any contributed data.

The complexity of the provision of the benchmark is measured as low, as Euronext does not use any contributed data. Euronext uses transaction data for all equity price indices. Number of unique sources of input data is limited to two (OPTIQ and Thomson Reuters). Euronext has sufficient technical means to process the input data continuously and robustly.

5 (3) (b) overseeing any changes in the benchmark methodology: as the Oversight function oversees material changes.

#### **Article 13 (2)(a) and (b)**

An administrator shall develop, operate and administer the benchmark and methodology transparently. To that end, the administrator shall publish or make available the following information:

- 2. The procedures required under point (c) of paragraph 1 shall provide for:
  - (a) advance notice, with a clear time frame, that gives the opportunity to analyze and comment upon the impact of such proposed material changes; and
  - (b) the comments referred to in point (a) of this paragraph, and the administrator's response to those comments, to be made accessible after any consultation, except where confidentiality has been requested by the originator of the comments.

## Rationale for Article 13(2)(a) and (b)

Material changes for Non-Significant Benchmarks are announced 2 months in advance. This allows concerned third parties to analyse the proposed changes and if necessary discuss with Euronext the proposed changes. Due to the limited number of products, funds managers and very low or non-existing AUM, Euronext considers that the consultation process described in 13 (2) (2) is not proportionate to the products and AUM related to its non-significant benchmarks.

**Article 14 (2)**

An administrator shall monitor input data and contributors in order to be able to notify the competent authority and provide all relevant information where the administrator suspects that, in relation to a benchmark, any conduct has taken place that may involve manipulation or attempted manipulation of the benchmark, under Regulation (EU) No 596/2014, including collusion to do so.

## Rationale for Article 14(2)

Although Euronext already reports market manipulation to the regulators (MAR) for our own market activity, we do not monitor market manipulation of non-Euronext exchange traded data of which some non-significant benchmarks are based.

### 3. List of Significant and Non-Significant Benchmarks

#### Significant indices

Index Family	ISIN Code	Mnemo	Index name
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#### Non-Significant indices

Index Family	ISIN Code	Mnemo	Index name
OBX	NO0000000021	OBX	OBX Total Return Index
OBX	NO0007035376	OBXP	OBX Price Index
OBX	NO0010865173	OBXU	OBX Uncapped Total Return Index
OBX	NO0010892151	OBXUP	OBX Uncapped Price Return Index
OBX	NO0007035327	OSEBX	Oslo Børs Benchmark Index_GI
OBX	NO0010865249	OSEBN	OSEBX Benchmark_NR
OBX	NO0010865256	OSEBP	OSEBX Benchmark_PR
OBX	NO0007035335	OSEFX	Oslo Børs Mutual Fund Index_GI
OBX	NO0010865264	OSEFN	OSEFX Mutual Fund_NR
OBX	NO0010865272	OSEFP	OSEFX Mutual Fund_PR
OBX	NO0010735640	OSEMX	Oslo Børs Mid Cap Index
OBX	NO0010865280	OSEMN	OSEMX Mid Cap_NR
OBX	NO0010865298	OSEMP	OSEMX Mid Cap_PR
OBX	NO0007035343	OSESX	Oslo Børs Small Cap Index_GI
OBX	NO0010865306	OSESN	OSESX Small Cap_NR
OBX	NO0010865314	OSESP	OSESX Small Cap_PR
Oslo Børs OBX Sector and All Share	NO0007033900	OSEAX	Oslo Børs All-share Index_GI
Oslo Børs OBX Sector and All Share	NO0010865223	OSEAN	OSE All share_NR
Oslo Børs OBX Sector and All Share	NO0010865231	OSEAP	OSE All share_PR
Oslo Børs OBX Sector and All Share	NO0010890320	OTECG	OBX Technology GR
Oslo Børs OBX Sector and All Share	NO0010890338	OTECN	OBX Technology NR
Oslo Børs OBX Sector and All Share	NO0010890346	OTECP	OBX Technology PR
Oslo Børs OBX Sector and All Share	NO0010890353	OTELG	OBX Telecommunications GR

Oslo Børs OBX Sector and All Share	NO0010890361	OTELN	OBX Telecommunications NR
Oslo Børs OBX Sector and All Share	NO0010890379	OTELP	OBX Telecommunications PR
Oslo Børs OBX Sector and All Share	NO0010890387	OHCG	OBX Health Care GR
Oslo Børs OBX Sector and All Share	NO0010890395	OHCN	OBX Health Care NR
Oslo Børs OBX Sector and All Share	NO0010890403	OHCP	OBX Health Care PR
Oslo Børs OBX Sector and All Share	NO0010890411	OFING	OBX Financials GR
Oslo Børs OBX Sector and All Share	NO0010890429	OFINN	OBX Financials NR
Oslo Børs OBX Sector and All Share	NO0010890437	OFINP	OBX Financials PR
Oslo Børs OBX Sector and All Share	NO0010890445	OREG	OBX Real Estate GR
Oslo Børs OBX Sector and All Share	NO0010890452	OREN	OBX Real Estate NR
Oslo Børs OBX Sector and All Share	NO0010890460	OREP	OBX Real Estate PR
Oslo Børs OBX Sector and All Share	NO0010890478	OCDG	OBX Consumer Discretionary GR
Oslo Børs OBX Sector and All Share	NO0010890486	OCDN	OBX Consumer Discretionary NR
Oslo Børs OBX Sector and All Share	NO0010890494	OCDP	OBX Consumer Discretionary PR
Oslo Børs OBX Sector and All Share	NO0010890502	OCSG	OBX Consumer Staples GR
Oslo Børs OBX Sector and All Share	NO0010890510	OCSN	OBX Consumer Staples NR
Oslo Børs OBX Sector and All Share	NO0010890528	OCSP	OBX Consumer Staples PR
Oslo Børs OBX Sector and All Share	NO0010890536	OING	OBX Industrials GR
Oslo Børs OBX Sector and All Share	NO0010890544	OINN	OBX Industrials NR
Oslo Børs OBX Sector and All Share	NO0010890551	OINP	OBX Industrials PR
Oslo Børs OBX Sector and All Share	NO0010890569	OBMG	OBX Basic Materials GR
Oslo Børs OBX Sector and All Share	NO0010890577	OBMN	OBX Basic Materials NR
Oslo Børs OBX Sector and All Share	NO0010890585	OBMP	OBX Basic Materials PR

Oslo Børs OBX Sector and All Share	NO0010890593	OENG	OBX Energy GR
Oslo Børs OBX Sector and All Share	NO0010890601	OENN	OBX Energy NR
Oslo Børs OBX Sector and All Share	NO0010890619	OENP	OBX Energy PR
Oslo Børs OBX Sector and All Share	NO0010890627	OUTG	OBX Utilities GR
Oslo Børs OBX Sector and All Share	NO0010890635	OUTN	OBX Utilities NR
Oslo Børs OBX Sector and All Share	NO0010890643	OUTP	OBX Utilities PR
Euronext Expand All-share	NO0007035384	OAAAX	Euronext Expand All-Share Index GR
Euronext Expand All-share	NO0010865322	OAAAXN	Euronext Expand All-Share Index NR
Euronext Expand All-share	NO0010865330	OAAAXP	Euronext Expand All-Share Index
Oslo Børs Investable Sector	NO0010590086	OBOSX	Oslo Børs OBX Oil Service Index
Oslo Børs Investable Sector	NO0010890650	OBOSP	OBOSX Oil Service PR
Oslo Børs Investable Sector	NO0010760663	OBSFX	Oslo Børs Seafood Index
Oslo Børs Investable Sector	NO0010865181	OBSFN	OBSFX Seafood_NR
Oslo Børs Investable Sector	NO0010865199	OBSFP	OBSFX Seafood_PR
Oslo Børs Investable Sector	NO0010771934	OBSHX	Oslo Børs Shipping Index
Oslo Børs Investable Sector	NO0010865207	OBSHN	OBSHX Shipping_NR
Oslo Børs Investable Sector	NO0010865215	OBSHP	OBSHX Shipping_PR
Oslo Børs Strong Sector	NO0010580590	SSENX	OSLO Energy Index
Oslo Børs Strong Sector	NO0010892169	SSENP	OSLO Energy Index PR
Oslo Børs Strong Sector	NO0010580624	SSSFX	OSLO Seafood Index
Oslo Børs Strong Sector	NO0010892177	SSSFP	OSLO Seafood Index PR
Oslo Børs Strong Sector	NO0010580640	SSSHX	OSLO Shipping Index
Oslo Børs Strong Sector	NO0010892185	SSSHP	OSLO Shipping Index PR
Oslo Børs Equity Certificate	NO0000000062	OSEEX	Oslo Børs Equity Certificate Index
Oslo Børs Equity Certificate	NO0010890668	OSEEP	Oslo Børs Equity Certificate Index PR
Oslo Børs Custom	NO0010865363	OSEBG	OSEBXG Index

Oslo Børs Custom	NO0010892193	OSEPX	OSEBXG Index PR
Oslo Børs Equity Certificate	NO0010865371	OSEER	OSEEXR Index
Oslo Børs Equity Certificate	NO0010892201	OSEXP	OSEEXR Index PR
Oslo Børs Custom	NO0010865355	OSEBS	OSEBX_STB Index
Oslo Børs Custom	NO0010892227	OSEPB	OSEBX_STB Index PR