

# Conflicts of Interest Public Disclosure Statement

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## Introduction

FTSE International Limited ("FIL") administers a number of Benchmarks in accordance with the relevant obligations of the International Organisation of Securities Commissions ("IOSCO") Principles for Financial Benchmarks, the UK Benchmark Regulation ("BMR").

FIL has in place robust governance arrangements (outlined below) which include a clear organisational structure with well-defined, transparent and consistent roles and responsibilities, to prevent or manage actual or perceived conflicts of interest between the firm, directors, managers, members of staff or any person directly or indirectly linked by control, and contributors or users, and to ensure that, where any expert judgement in the benchmark determination process is required, it is independently and objectively exercised.

All staff within the LSEG Group, including those undertaking work on behalf of FIL, are bound by the [London Stock Exchange Group \("LSEG"\) Code of Conduct](#), which includes policies on organisational and other conflicts of interest. In addition to a Conflicts of Interest policy and procedure, there are other policies and procedures to identify, prevent, manage and mitigate potential conflicts of interest, including:

- Anti-Bribery and Corruption;
- Gifts and Entertainment;
- Hiring and remuneration;
- Whistleblowing;
- Information Security
- Compliance Manual; and
- Personal Account Dealing

## Conflicts of Interest Management

FIL monitors its business and operations to identify activities which may cause an actual or perceived conflict of interest. In addition, every member of staff is responsible for identifying, reporting and escalating potential conflicts of interest. This ongoing identification is intended to ensure prevention, management and mitigation of conflicts of interest in order to protect the integrity and independence in the provision of benchmarks.

Any conflict identified is documented and retained within a conflicts of interest register. The conflicts of interest register is reviewed on at least an annual basis, or more frequently when a perceived or actual conflict of interest has been identified.

For further information on conflicts relating to WMR, please go to: [WMR COI Public Statement](#).



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## Governance and Oversight

To oversee its business, FIL operates a three lines of defence risk management framework and has in place a robust governance structure for its benchmark administration activities that includes the Board, Governance Forums, Oversight Committees, Risk Committee, as well as dedicated oversight and control functions. Compliance department members attend all committees providing assurance over FIL's ongoing regulatory compliance.

## Benchmark Methodologies and Statements

FIL's benchmark methodologies and statements are clearly defined, rules-based and transparent, being publicly available on FTSE webpages. The benchmark methodologies are designed to define and minimise expert judgement.

## Polices and Training

LSEG and FIL requires staff to undertake mandatory compliance training including training on the [London Stock Exchange Group Code of Conduct](#), including conflicts of interest.

## Whistleblowing and Confidential Employee Hotline

A dedicated, confidential hotline and reporting portal are available under the [London Stock Exchange Group Code of Conduct](#) for whistleblowing, to enable staff to report any concerns they may have as to an actual or potential breach of the Code, or of laws or regulation.

## ABOUT FTSE RUSSELL

FTSE Russell is a leading global provider of index and benchmark solutions, spanning diverse asset classes and investment objectives. As a trusted investment partner we help investors make better-informed investment decisions, manage risk, and seize opportunities.

Market participants look to us for our expertise in developing and managing global index solutions across asset classes. Asset owners, asset managers, ETF providers and investment banks choose FTSE Russell solutions to benchmark their investment performance and create investment funds, ETFs, structured products, and index-based derivatives. Our clients use our solutions for asset allocation, investment strategy analysis and risk management, and value us for our robust governance process and operational integrity.

For over 35 years we have been at the forefront of driving change for the investor, always innovating to shape the next generation of benchmarks and investment solutions that open up new opportunities for the global investment community.

## CONTACT US

To learn more, visit [lseg.com/ftse-russell](https://lseg.com/ftse-russell); email [info@ftserussell.com](mailto:info@ftserussell.com); or call your regional Client Service team office:

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