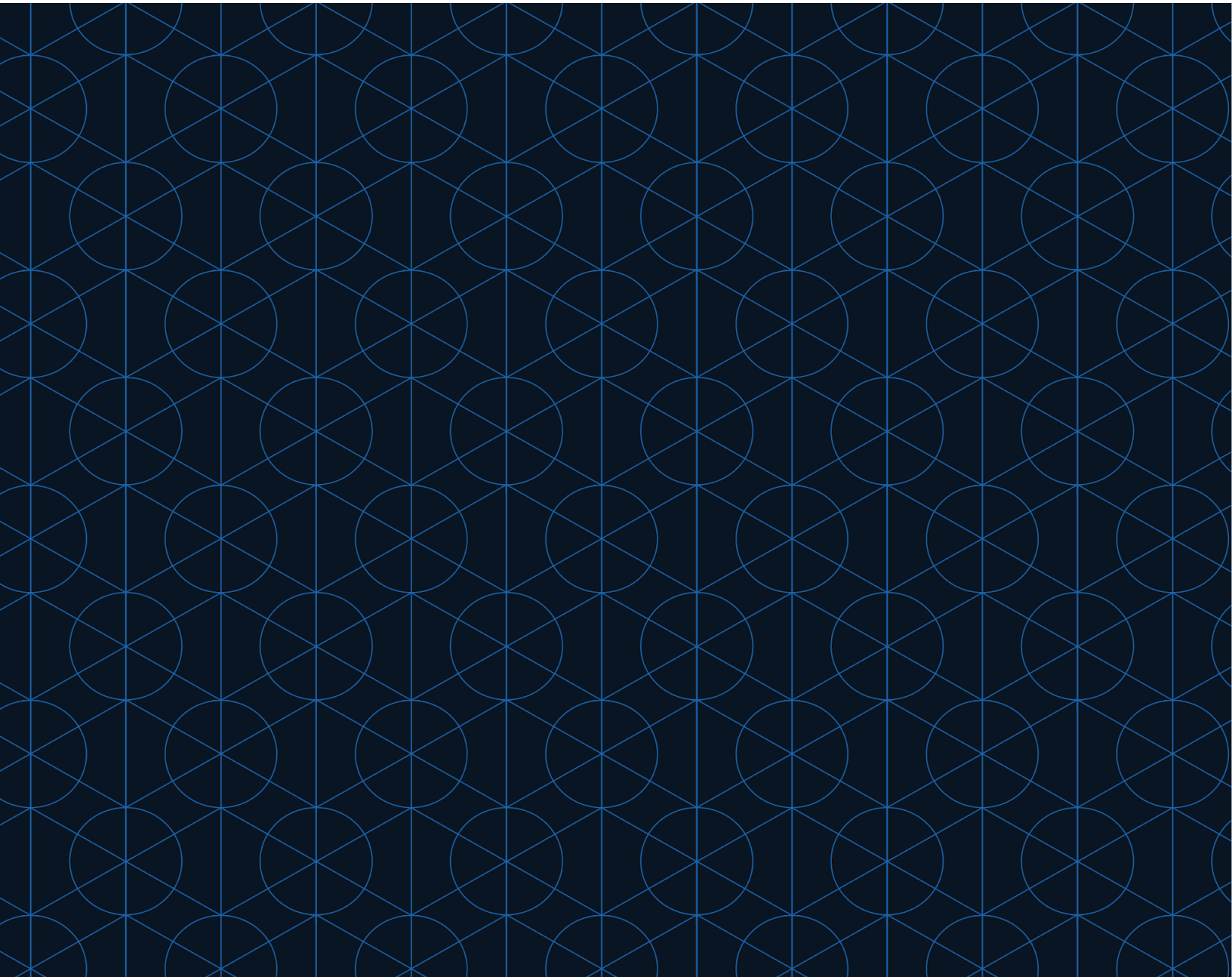


Benchmark Methodology Change and Cessation Procedures v.1.0

Feb 2023

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Approver: Shane Riedel, CEO



1. Background

These procedures set out the process which Elucidate must follow as an Administrator, in line with Article 13 (1)c) and 28(1) of the EU Benchmarking Regulations (BMR), should a material change be made to the Elucidate FinCrime Index (EFI) methodology or should Elucidate cease the provision of a benchmark. Elucidate is required to have in place and publish these procedures to mitigate the risk of uncertainty as well as the disruption in case of changes to or the cessation of a benchmark.

Changes to the methodology may be related to:

- Improvements required to enhance the quality of outputs.
- External factors, beyond the control of Elucidate, which necessitate a change to, or the cessation of, the benchmark. Such factors may include, but not be limited to, the ability to access key information used for the production of the benchmark and/or new information on market conditions which materially impact the parameters of the methodology used to produce the benchmark.

This document is reviewed at least on an annual basis, or on an ad hoc basis if required.

2. Objectives

The objectives of the procedure are to provide users with clear guidance on:

- a. How material changes are made to the EFI methodology
- b. How to those changes are communicated
- c. How to make adjustments, if needed, in response to such changes
- d. Actions to take in case of cessation of a benchmark.

3. Material methodology changes

The steps followed to make material changes to the methodology are as follows:

1. Changes to the EFI methodology are reviewed, justified, tested and documented by the Elucidate Product and Data Science teams.
2. Material changes are then subject to approval by Elucidate's Senior Management.
3. The Model Oversight Subcommittee is informed in writing of material changes and provided with an opportunity to challenge the changes and/or object to them.
4. Material changes are communicated at least one month in advance of release to users directly via the EFI platform in the form of notifications.¹ The notification must include a description of the

¹ Article 27(2)(c) of Regulation (EU) 2016/1011

change, a rationale for the change, a summary of the anticipated impact of the change, and the date at which the change is expected to be released.

5. As a means of consultation, users may raise questions, queries or concerns about the proposed change for up to three weeks after the release of the notification to bmr@elucidate.co. All comments, questions, queries or concerns must be answered in writing by Elucidate prior to release. Should Elucidate decide to retract the change or postpone its release, it shall notify the users in writing via the EFI platform.

The distinction between material and non-material change is included in the EFI White Paper. Non-material changes nevertheless require the approval of the Chief Product Officer (CPO) before release. The CPO may, at its discretion, reclassify and change from non-material to material and, in doing so, initiate this procedure.

4. Cessation of Benchmark

The steps to be followed in case of cessation of a benchmark are as follows:

1. Proposed cessation of any EFI Benchmark is communicated in writing to the Model Oversight Subcommittee, who may choose how best to consider the proposal per its Terms of Reference.
2. The proposal should include the timing of the cessation, the length of any notice period, communication of the cessation, whether any transitional measures are needed, and the approximated amount of financial contracts referencing the Benchmark.
3. The process leading to the cessation of any EFI Benchmark is overseen by the Chief Product Officer and regular updates are provided in writing to the members of the Model Oversight Committee.
4. Following a decision to cease a Benchmark, the steps taken to facilitate the transition of users include the identification of users of the Index, advanced notice to relevant counterparties, and the provision of written confirmation of cessation once completed.