



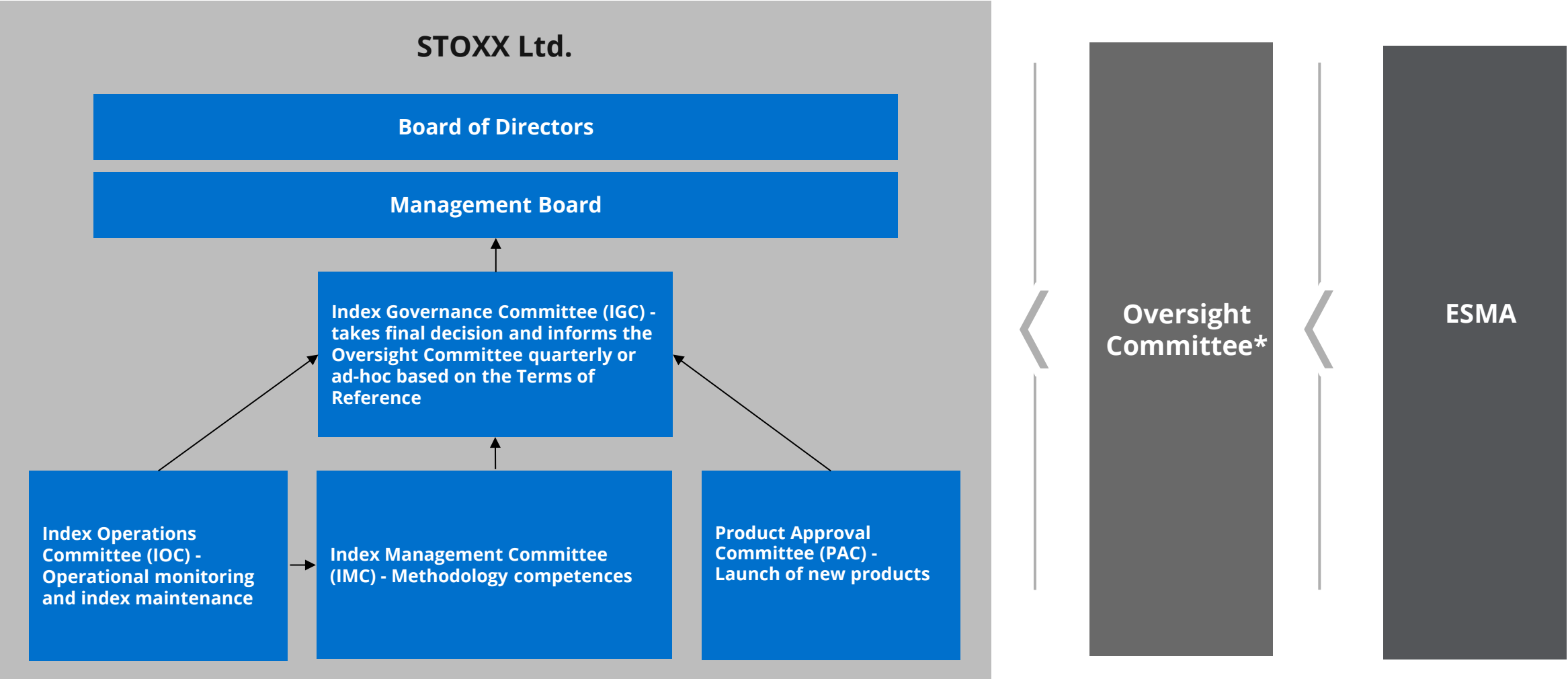
25 years of index innovation

STOXX Governance Structure

September 2024
STOXX Compliance

Governance and Oversight










STOXX internal governance and external oversight




*4 voting members from DBAG (whereof 1 as Legal Representative) and 5 members from STOXX Ltd. (whereof 2 non-voting)

Oversight Committee

Tasks and informational flow to oversight function – Oversight Committee (art. 5 BMR)

Task		IOC ¹⁾	IMC ¹⁾	IGC ¹⁾
Art. 5.3 a)	> reviewing the benchmark's definition and methodology at least annually;			✓
Art. 5.3 b)	> overseeing any changes to the benchmark methodology and being able to request the administrator to consult on such changes ²⁾ ;			✓
Art. 5.3 c)	> overseeing the administrator's control framework , the management and operation of the benchmark, and, where the benchmark is based on input data from contributors, the code of conduct referred to in Article 15;	for Operations related topics 	for PD related topics 	✓
Art. 5.3 d)	> reviewing and approving procedures for cessation of the benchmark, including any consultation about a cessation ²⁾ ;			✓
Art. 5.3 e)	> overseeing any third party involved in the provision of the benchmark, including calculation or dissemination agents;	for Operations related topics 	for PD related topics 	✓
Art. 5.3 f)	> assessing internal and external audits or reviews , and monitoring the implementation of identified remedial actions;			✓
Art. 5.3 g)	> where the benchmark is based on input data from contributors, monitoring the input data and contributors and the actions of the administrator in challenging or validating contributions of input data; (<i>NOT RELEVANT – NO CONTRIBUTION</i>)			✓
Art. 5.3 h)	> where the benchmark is based on input data from contributors, taking effective measures in respect of any breaches of the code of conduct referred to in Article 15; (<i>NOT RELEVANT</i>)			✓
Art. 5.3 i)	> reporting to the relevant competent authorities any misconduct by contributors, where the benchmark is based on input data from contributors, or administrators , of which the oversight function becomes aware, and any anomalous or suspicious input data .			✓

✓ responsible for provision to the Oversight Committee

 responsible for preparation of documents

1) A more detailed description of each committees responsibilities and the escalation process is described in the provided "STOXX Governance Business Committee Responsibilities" document;

2) In case of changes to methodologies/benchmark cessation for Significant Benchmarks above €50bn AuM: a) where IGC does not trigger a consultation, IGC informs the OC for feedback. OC will provide any feedback to the IGC within 4 weeks. In urgent circumstances a fast track process will be initiated b) if a consultation is triggered, IGC shall send a notification to the OC.

Oversight Committee Standing Agenda

- 1 Update on ESMA
- 2 BMR Index Methodology Review
- 3 STOXX Control Framework
- 4 Benchmark Methodology Changes and respective consultations
- 5 Cessation of Benchmark & respective consultations
- 6 New contracts – Outsourcing Inventory Update
- 7 Third Party Monitoring – Business Surveillance
- 8 Findings from External Audit & Internal Audit
- 9 Monitoring of Input Data
- 10 AOB

Composition of STOXX Oversight Committee

Stakeholder	Member	Member's title / Function	Company	Competence
DBAG	Martin Oakley	Global Head Regulatory Affairs and Group Chief Compliance Officer	360T	Chief Counsel for regulatory affairs and Group Compliance Officer overseeing 360T and its subsidiaries
	Michael Köhn	Head of Group Compliance Advisory, Group MLRO & Deputy CCO	Deutsche Börse AG	Leading the compliance advisory section of Deutsche Börse AG
	Stuart Heath	Executive Director	Eurex Frankfurt	Director – Equity & Index Product Development
LR EU (DBAG)	Monir Taik	Head of Unit, Regulatory Legal	Deutsche Börse AG	Legal Counsel
STOXX	Markus Zellmann	Senior Director, Legal (Chairman)	STOXX Ltd.	Legal Counsel
	Leonardo Scimmi	Principal, Compliance (Vice-Chairman)	STOXX Ltd.	Compliance Officer
	Markus Leippold	University Professor	UZH Zurich	Professor and Chair in Financial Engineering
STOXX (non-voting members)	TBD*		STOXX Ltd.	Operations
	Serkan Batir*	Managing Director, Global Head, Benchmarks DAX and STOXX	STOXX Ltd.	Product

Voting members are not involved in the provision of the benchmark.

* Non-voting members

BMR Committees

Index Governance: Index Governance Committee (IGC)

Responsibilities	Voting	Members
<p>The responsibilities of the IGC and the interactions with the OC with regard to all STOXX Benchmarks are described in Annex 1 and Annex 2 of the Terms of Reference of the IGC and of the OC. IGC meets weekly and its responsibilities include i.a.:</p> <p>IGC takes final decision on topics escalated from IOC and/or IMC, e.g.</p> <ul style="list-style-type: none"> ▪ final decision on extraordinary market conditions impact on indices, ▪ periodic review of index methodologies, ▪ material changes to methodologies, ▪ index cessations, ▪ limitations (e.g. insufficient or unclear rules, insufficient data quantity or quality, extreme market events), ▪ outsourcing monitoring, ▪ remedial actions on internal and external audits, ▪ monitoring of quarterly input data report, ▪ review of complex corporate actions, ▪ complaints treatment ▪ confirmations regarding significant benchmarks (significant vs non-significant benchmarks) ▪ launches of indices when escalated from PAC (non-standard launches) ▪ inform ESMA about governance changes ▪ approve conflict of interest corporate register and BMR control framework changes ▪ informs the Oversight Committee on topics in scope of Art. 5 BMR on a quarterly basis or ad-hoc, based on the IGC Terms of Reference. 	<p>The approval of any matter requires a simple majority of at least 51% of all members present.</p>	<ol style="list-style-type: none"> 1. Senior Managing Director, Indices and Benchmarks¹ - (MB member) 2. Senior Managing Director, Operations² - (MB member) 3. Managing Director, DAX and STOXX Product Index 4. Managing Director, Operations 5. Managing Director, CTO Index - (MB member) 6. Managing Director, Sales, EMEA 7. Managing Director, Compliance (non-voting) - (MB member)

1) Chair of the Committee, 2) Vice-Chair of the Committee

Index Governance: Committees under the IGC

Committee	Responsibilities	Voting	Members
Product Approval Committee (PAC)	The purpose of the Product Approval Committee ("PAC") is to carry out the activities as detailed in Annex 1 of the PAC Terms of Reference and provide a governance structure to oversee the benchmark design process and perform a quality gate prior to launching of new benchmarks. Its main task is to approve or decline the implementation of the launch of a benchmark.	The approval of any matter requires a simple majority of at least 51% of all members present.	<ol style="list-style-type: none"> 1. TBA 2. TBA 3. Managing Director, Index Operations 4. Managing Director, Operations ² 5. Managing Director, Sales, EMEA 6. Senior Managing Director, Indices
Index Management Committee (IMC)	The responsibilities of the IMC and the interactions with the IGC and the OC are described in Annex 1 and Annex 2 of the Terms of Reference of the IMC. The IMC gathers necessary information and takes final decision for non-material changes to methodologies. IMC escalates however to the IGC decisions concerning material methodology changes and the related market consultations. IMC also usually gathers relevant information and escalates to IGC about limitations, annual methodology reviews, index cessations, exceed of threshold to significant benchmarks and complex corporate actions treatment.	The approval of any matter requires a simple majority of at least 51% of all members present.	<ol style="list-style-type: none"> 1. Senior Director, Index Product R&D ¹ 2. Director, Index Product R&D ² 3. Director, Global Benchmarks DAX ² 4. Director, Global Benchmarks STOXX ² 5. Managing Director, Index Operations 6. Managing Director, Sales, Strategic Accounts 7. Managing Director, Index Engineering
Index Operations Committee (IOC)	The responsibilities of the IOC and the interactions with the IMC, the IGC and the OC with regard to all STOXX Benchmarks are described in Annex 1 and Annex 2 of the Terms of Reference of the IOC. IOC initiates the annual review of the BMR Control Framework, prepares the necessary information about limitations, prepares measures to monitor input data, reviews and approves treatment of calculation errors, reviews and approve/escalates special cases arising from index review, reviews and approves/escalates complex corporate actions.	The approval of any matter requires a simple majority of at least 51% of all members present.	<ol style="list-style-type: none"> 1. Managing Director, Index Operations¹ 2. Senior Director, Index Review, STOXX & DAX 3. Senior Director, Corporate Actions, EU & US 4. Senior Director, Corporate Actions, APAC 5. Associate Principal, Surveillance and Monitoring, Equity Indices, Europe & US 6. Associate Principal, Surveillance and Monitoring, Strategy & Fixed Income Indices, EU & US 7. Director, Surveillance and monitoring, Equity & Fixed Income Indices, APAC

1) Chair of the Committee, 2) Vice-Chair of the Committee