

# **WISDOMTREE BENCHMARK ADMINISTRATION GOVERNANCE**

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## **IOSCO Principles for Financial Benchmarks**

WisdomTree, Inc (the “Benchmark Administrator” or “WT”) seeks to abide by the Principles for Financial Benchmarks issued by the Board of the International Organization of Securities Commissions (IOSCO). In particular, WT, as benchmark administrator:

### *Governance*

- a) Retains primary responsibility for all aspects of the Benchmark determination process.
- b) Engages a number of third-party calculation agents over which it exercises oversight and in respect of which written agreements are in place setting out respective roles and responsibilities.
- c) Maintains a Benchmark Administration Policy which includes policies and procedures covering the identification, disclosure, management and avoidance of conflicts of interest, including the disclosure of any material conflicts of interest to stakeholders and any relevant regulatory authority. No material conflicts of interest have been identified to date.
- d) Has established a control framework by way of this Benchmark Methodology document for the process of determining and distributing the Benchmark which includes whistleblowing procedures.
- e) Has appointed a Benchmark Oversight Working Group to provide effective oversight of the Administrator.

### *Quality of the benchmark*

- f) Incorporates generic design factors that are intended to result in a reliable representation of the economic realities of the interest that each Benchmark seeks to measure.
- g) Uses data inputs observable from transactions conducted in active markets at arm’s length.
- h) In the unusual circumstances where non-transactional data is used to determine a benchmark, shall derive such data from an active market.
- i) Has established clear guidelines regarding the hierarchy of data inputs and the exercise of expert judgment used for the determination of benchmarks.
- j) Determines each benchmark using executable quotes exclusively and therefore the publication of explanations as to how the benchmark is determined on each occasion is deemed unnecessary.
- k) Undertakes periodic reviews to determine whether the interest measured by a benchmark has undergone structural changes that might require changes to the design of the methodology. A summary of such reviews is published when material revisions have been made to a benchmark, including the rationale for the revisions.

### *Quality of the methodology*

- l) Publishes this Benchmark Methodology document to facilitate stakeholders to understand how each benchmark is derived and to assess its representativeness and suitability.
- m) Publishes its procedures and rationale for any proposed material change in its

- methodology.
- n) Has prepared written policies and procedures governing the cessation of a benchmark. Stakeholders are encouraged to have robust fall-back provisions in contracts or financial instruments that reference a benchmark.
  - o) Has established appropriate internal controls over the data collection and transmission processes including selecting the source, collecting the data and protecting the integrity and confidentiality of the data.

#### *Accountability*

- p) Has established a written complaints policy which can be provided to stakeholders upon request and used to raise concerns regarding the application of the benchmark methodology or whether the benchmark is representative of the interest it seeks to measure, etc.
- q) Has not appointed an independent internal or external auditor to periodically review and report on its adherence to its publicized Benchmark Methodology or to these IOSCO principles for financial benchmarks on the basis that there are no third-party users of its benchmarks.
- r) Retains records for at least five years including records of the use of expert judgement and discretion. Instances of the use of expert judgement and discretion are recorded and presented at the subsequent meeting of the Benchmark Oversight Working Group.
- s) Shall promptly provide such information requested by relevant Regulatory Authorities in carrying out their regulatory or supervisory duties.

#### **Review and approval of new benchmarks and changes to existing benchmarks**

In addition to periodic rebalancing and/or reconstitution (as applicable), in order to ensure that an index correctly measures the economic realities of the market(s) it is intended to represent and that it meets its overall objective, internal index methodology reviews are undertaken by the Benchmark Administrator, as follows:

- (i) existing index methodologies are reviewed on at least an annual basis,
- (ii) newly proposed index methodologies are reviewed prior to index launch, and
- (iii) ad-hoc changes are made to an index methodology where deemed reasonable or necessary.

An analysis of the impact or expected benefits of changes to an index methodology is completed by each index committee, where one is established. All changes (including additions and deletions) to an index are then subject to the review and approval of the WisdomTree Index Administration Team (IAT). The IAT may also make adjustments to an index at its discretion when such changes are deemed reasonable or necessary. The review of and proposed changes to index methodologies by the index committees and the IAT are subject to the oversight of the Benchmark Oversight Working Group.

In determining whether an index methodology change is material, the following factors shall be taken into account by the IAT:

- (i) economic impact of the material change, as applicable; or

- (ii) whether the change affects the overall objective of the index.

Material changes will be publicly announced on the WisdomTree website ([www.wisdomtree.com](http://www.wisdomtree.com)), with advance announcement to the extent reasonably practicable under the circumstances. Advance announcement of pending material changes to an index methodology will include the following details, as applicable:

1. Description of the material change to the index methodology
2. Anticipated date the material change will be effective
3. Any impact on the index construction process
4. Date by which feedback will be collected from stakeholders, where elicited.

Once an applicable feedback period has ended, the IAT will assess feedback. The IAT reserves the right to move forward (or not) with any material change in its discretion. The IAT may also choose to consult stakeholders after an applicable feedback period.

To the extent a final index methodology change differs from a pending index methodology change as described in an advance announcement, the IAT will seek to provide advance announcement of such final index methodology change via the WisdomTree website prior to implementation. In any event, an updated version of the index methodology document will also be made available by the IAT on the WisdomTree website.

### **Use of Discretion and Exercise of Expert Judgement**

The Benchmark Methodology document is written with the intention of removing the need for judgement or discretion to be exercised in so far as is feasible. However, there may be unusual or complex circumstances that it does not cover. The Benchmark Administrator or the Index Committee, if one has been established, may exercise discretion to:

- a. Determine whether a market disruption or another event has occurred that may lead to the Input Data being insufficient or unreliable.
- b. Estimate or adjust the level of Input Data in the event of a market disruption, for example, if the exchange official closing prices are deemed unreliable, whether last traded price should be used.
- c. Address other unscheduled events which may make it impossible to calculate the benchmark.
- d. Treatment of unusual or complex corporate actions and events
- e. Decide whether to:
  - (i) estimate or adjust the level of Input Data in the above circumstances or
  - (ii) suspend or delay the calculation and publication of the benchmark or
  - (iii) supplement, amend (in whole or in part), revise, rebalance the benchmark.
- f. Decide how to address errors in Input Data or in the determination of the benchmark, including whether to restate the benchmark in such circumstances.
- g. Decide how to address any omissions or ambiguities in the relevant Benchmark Methodology.
- h. Decide whether to terminate the Benchmark.

The use of discretion and exercise of expert judgement shall be applied to all benchmarks consistently whilst minimising the potential for conflicts of interest. Discretion can be exercised by Benchmark Administrator or the Index Committee, if one is established, and is subject to the oversight of the Benchmark Oversight Working Group.

### **Procedures in periods of stress or when input data is unreliable**

WT endeavors to develop and publish indices only where it has a high level of confidence of long-term availability and access to the necessary data to administer the indices. In normal circumstances, the price of constituents shall be the last trade, auction, VWAP or official close, depending on the trading venue. In the event of any unscheduled and extraordinary condition in which liquidity in the markets used to source input data is interrupted (such as an event resulting in the unscheduled closing of stock exchanges), WT reserves the right to take such action with respect to its indices as it deems appropriate given the circumstances and after consulting with the IAT, index committee and Benchmark Oversight Working Group as appropriate. WT will attempt to notify interested parties of any such actions as well in advance to the extent practicable.

### **Benchmark complaints handling**

During the normal course of business, WT would expect to have ongoing dialogue with market participants and other users of our benchmarks. This dialogue may concern discussions around methodology, the application of methodology, why input data has been included or excluded on a specific day or other such matters. Such dialogue would, in the first instance, not be registered as a formal complaint and instead, WT will seek to answer any such questions to the satisfaction of the individual or company making the enquiry.

Should a subscriber remain dissatisfied with the outcome of such an enquiry, as it pertains to the calculation of a benchmark, they are entitled to submit a formal complaint.

Subscribers to any WT benchmarks may submit complaints on (i) whether a specific index determination is representative of market value; (ii) a proposed change to the index determination process; (iii) the application of the methodology in relation to a specific index determination, and on other decisions in relation to the index determination process. In order for a formal complaint to be recognised, it must be made in writing to the Head of Compliance, WisdomTree Ireland Ltd, 16 Fitzwilliam Place, Dublin, D02 FF82, or electronically to [europesupport@wisdomtree.com](mailto:europesupport@wisdomtree.com).

WT will acknowledge receipt of a complaint within 24 hours of it being received, and will provide an initial response within 5 business days. That initial response may include a request for further information to support the complaint being made, after which the complaint is reviewed in detail by the WisdomTree Ireland Ltd (WTIE) Compliance Team. WT is committed to investigating all such complaints in a fair and timely manner, independently of any individual who may be subject to the complaint. No individual who

is the subject of a complaint is involved in any stage of the complaints process. The WTIE Head of Compliance will then determine the validity of the complaint and determine whether or not the complaint be escalated to the Risk and Compliance Committee, or relevant Boards.

Where such escalation is determined not to be required, the Head of Compliance will formally notify the complainant of the outcome of the investigation unless such communication would be contrary to market abuse regulations ((EU) No 596/2014). WT will seek to review and respond to any complainants within 8 weeks, advising the complainant on either the outcome, or the decision to escalate the complaint.

If a complainant considers that WT has not adhered to its complaints handling policy, they are entitled, within six months of the original complaint determination, to request a review of whether the complaints process was adhered to – such request being made to the WTIE Head of Compliance. The WTIE Head of Compliance will then refer the matter to the Risk and Compliance Committee for review, the outcome of which will be communicated to the complainant at the conclusion. In such circumstances, the complainant will bear the costs of the review if the review concludes that the complaints process was followed correctly.

All complaints records are kept for a minimum of five years.

If a formal or informal complaint results in a change in price, the details of that change in price is communicated to the market as soon as possible in line with this policy.

**"The "UCITS" denomination of the index does not guarantee or imply compliance with the Directive 2009/65/EC (the UCITS Directive), as amended, and as such, licensees or other users of this index should carry out their own assessment to ensure compliance with the UCITS Directive, if relevant."**