


Document	Name	FINANCIAL BENCHMARKS MANAGEMENT PROCEDURE	
	Type	PROCEDURE	
	Code	05.PRO.02	
	Date of Approval	22/09/2022	
	Date of Revision	-	
	Revision Number	-	
	Prepared by	INDEX DIRECTORATE	
	Approved by	CHIEF EXECUTIVE OFFICER	



BORSA İSTANBUL A.Ş.

FINANCIAL BENCHMARKS MANAGEMENT PROCEDURE

İSTANBUL – 2022

DISCLAIMER: This document is a translation from its Turkish original. In case of a discrepancy, the original document in Turkish shall prevail. Borsa İstanbul A.Ş. is not responsible for translation errors.

This document is owned by Borsa İstanbul A.Ş.. Current version of this document is published in corporate web site of Borsa İstanbul A.Ş. Before use, please check whether this file is the correct version of document or not.

LIST OF INDEX

1. Purpose and Scope	4
2. Grounds.....	4
3. Definitions and Abbreviations	4
4. Decision-making Body	6
5. Financial Benchmarks Committee	6
6. Determination, Creation, Calculation and Dissemination of Financial Benchmarks.....	7
6.1. Determination and Announcement of Financial Benchmarks	7
6.2. Reliability and Integrity of Financial Benchmarks	7
6.3. Operational Risks in Calculation and Dissemination of Financial Benchmarks.....	8
6.4. Integrity of Inputs Used in Financial Benchmarks	8
6.5. Employees Involved in Calculation of Financial Benchmarks	8
6.6. Outsourcing of Services in Creation and Calculation of Financial Benchmarks	9
6.6.1. Outsourcing of Services	9
6.6.2. Components of Service Procurement Agreements	9
6.6.3. Oversight of Third Parties.....	10
6.6.4. Disclosure of Third Parties	10
7. Changes in the Methodology of Financial Benchmarks	10
7.1. Determination of Information Requesting Parties in Changes	10
7.2. Material Changes	11
7.3. Justification of Material Changes	11
7.4. Determination of Material Changes.....	11
7.5. Collection of Opinions on Material Changes, and Publishing of Collected Opinions and Final Decision	11
7.6. Non-material Changes.....	12
7.7. Urgent Material Changes	12
7.8. Review of Definition and Methodology of Financial Benchmarks	12
8. Cessation of Financial Benchmarks.....	12
8.1. Reasons of Cessation	12
8.2. Cessation of Non-critical Financial Benchmarks.....	13
8.3. Cessation of Critical Financial Benchmarks	13
8.4. Urgent Cessation.....	14
8.5. Determination of Alternative Financial Benchmarks in the Case of Cessation	14
9. Rules Required to be Complied with by Submitters.....	15
9.1. Use of Submissions.....	15
9.2. Termination of Submissions	16

9.3.	Roles and Responsibilities in Submissions	16
9.4.	Internal Control and Audit Systems of Submitters	16
9.5.	Submitter Code of Conduct.....	17
9.6.	Training of Submitters' Employees	17
9.7.	Prevention of Frauds by Submitters.....	17
9.8.	Keeping of Records by Submitters	18
9.9.	Audit of Submitters.....	18
10.	Prevention of Conflicts of Interest in Financial Benchmarks	18
11.	Accountability in Financial Benchmarks	19
12.	Review	19
13.	Subjects on Which the Procedure Remains Silent	19
14.	Miscellaneous and Final Provisions.....	19
15.	Effective Date	19
16.	Enforcement.....	19
	ANNEX 1: Working Procedures and Principles of Borsa İstanbul Financial Benchmarks Committee...	20

1. Purpose and Scope

(1) This Procedure sets down and regulates the principles regarding the creation, calculation and dissemination of Financial Benchmarks, and material and non-material changes in the Methodology of Financial Benchmarks, and cessation of Financial Benchmarks, and rules required to be complied with by Submitters, and accountability in Financial Benchmarks, and control and oversight of Financial Benchmarks, also including the oversight of third parties in the creation and calculation of Financial Benchmarks as set out in Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles.

2. Grounds

(1) This Procedure is prepared and issued in reliance upon Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles.

3. Definitions and Abbreviations

(1) For the purposes and in the context of this Procedure:

“Administrator” refers to and stands for Borsa İstanbul A.Ş. as the legal entity which has control on the Financial Benchmarks compliant with IOSCO Principles and which carries out the processes relating to preparation, calculation and publishing of the regulations in regard to the Financial Benchmarks; and

“BIST-KYD Indices Committee” refers to a committee composed of 3 representatives from each of Borsa İstanbul A.Ş. and Turkish Institutional Investment Managers’ Association (TKYD) in order to take advisory decisions with regard to the changes to be made in the indices Methodology, including, but not limited to, the oversight and surveillance of activities aimed at calculation and continuity of BIST-KYD Indices, and the creation of new indices by taking into consideration the market developments and the newly emerging needs and demands, and the termination of calculation of some of the existing indices; and

“Borsa İstanbul” stands for Borsa İstanbul A.Ş.; and

“Chief Executive Officer” stands for Borsa İstanbul A.Ş. Chief Executive Officer; and

“Critical Financial Benchmarks” refers to Financial Benchmarks covered by Article 20-1 of the Regulation 2016/1011 of the European Parliament; and

“Decision-making Body” stands for the authority referred to in Article 4 “Decision-making Body” of this Procedure, depending on the qualifications of the related Financial Benchmarks; and

“Expert Judgment” refers to the exercise of discretion by Borsa İstanbul or Submitter with respect to the use of data in determining a Financial Benchmark. Expert Judgment includes extrapolating values from prior or related transactions, adjusting values for factors that might influence the quality of data such as market events or impairment of a buyer or seller’s credit quality, or weighting firm bids or offers greater than a particular concluded transaction; and

“Financial Benchmarks Committee” refers to a Committee formed and appointed by Borsa İstanbul for the sake of development of opinions and proposals on all and any issues that may be included in the scope of control and oversight of Financial Benchmarks, in order to perform the control and oversight functions described in Article 8 “Control Framework” and Article 9 “Internal Oversight” of Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles; and

“Financial Benchmarks” refers to indices, prices, rates and similar other items which are regularly calculated by using a specific formula or another calculation method, and are presented to users against remuneration or free of charge, and are used in determination of value of a certain capital market instrument, financial contract or product, or in tracking of its rates of return, or in determination of the amount of payment to be made in reliance thereupon, or in determination of asset distribution or portfolio, or in calculation of performance premiums, and are under the Administration of Borsa İstanbul; and

“Four Eyes Principle” refers to the principle of review and approval of any action by two different authorized persons before it is taken; and

“Index Directorate” stands for Borsa İstanbul Index Directorate; and

“Index” refers to indicators which are regularly determined and published or made available by application of a specific formula or another calculation method or by assessment through use of certain assets, prices, returns or rates included therein (also including estimated prices or interest rates, standing orders or other values or observations); and

“IOSCO” stands for the International Organisation of Securities Commissions; and

“Market Authority” refers to such institutions as Regulatory Authorities, self-regulatory organisations, organised markets, exchanges or clearing houses; and

“Methodology” refers to the written rules and procedures according to which information is collected and the Financial Benchmark is determined by Borsa İstanbul A.Ş.; and

“National Authority” refers to and stands for the related public authorities in Türkiye which have public liability or interest in determination of policies for Financial Benchmarks, except for CMB; and

“Non-critical Financial Benchmarks” refers to Financial Benchmarks uncovered by Article 20-1 of the Regulation 2016/1011 of the European Parliament; and

“Regulatory Authority” or “CMB” stands for Capital Markets Board; and

“Stakeholder(s)” refers to Subscribers and other persons or entities who own contracts or financial instruments that reference a Financial Benchmark; and

“Submission(s)” refers to prices, estimates, values, rates or other information that is provided by a Submitter to Borsa İstanbul for the purposes of determining a Financial Benchmark. This excludes data sourced from regulated markets or exchanges with mandatory post-trade transparency requirements; and

“Submitter(s)” refers to legal entities providing information to Borsa İstanbul A.Ş. required in connection with the determination of a Financial Benchmarks; and

“Subscriber(s)” refers to a person or entity that purchases Financial Benchmark determination services from Borsa İstanbul Financial Benchmarks; and

“TLREF Committee” stands for a committee comprised of delegates from Borsa İstanbul A.Ş., Republic of Türkiye Ministry of Treasury and Finance, Central Bank of the Republic of Türkiye, Turkish Capital Markets Association, and İstanbul Settlement and Custody Bank, as well as banks elected in the name of the Banks Association of Türkiye, and created within the organisation of TBB, for the oversight and surveillance of activities aimed at calculation and continuity of TLREF rate and BIST-KYD Index, and for the activities related to changes needed in the Methodology by taking into consideration the market developments and the newly emerging needs and demands; and

“TLREF Index” stands for Turkish Lira Reference Interest Rate Index; and

“TLREF Rate” stands for Turkish Lira Reference Interest Rate.

4. Decision-making Body

(1) The creation of Financial Benchmarks, and determination, calculation, publishing and distribution of the Methodology; and the conduct and oversight of operations in relation therewith; and the outsourcing of services and/or data submission in creation and calculation of Financial Benchmarks, and scope of the services to be outsourced and/or the data to be collected, and components of service outsourcing agreements; and the changes to be made in the Methodology of Financial Benchmarks, and whether the change to be made is a material change or not; and the cessation of Financial Benchmarks; and in the case of Financial Benchmarks to be calculated by using Submissions, the determination of Submissions and Submitters best reflecting the change aimed to be measured by Financial Benchmarks; and the rules required to be complied with by Submitters are decided:

- a) by TLREF Committee for TLREF Rate and BIST TLREF Index, and
- b) by TLREFK Committee for TLREFK Rate and BIST TLREFK Index, and by Chief Executive Officer upon a proposal of the Financial Benchmarks Committee for BIST-KYD Indices, and
- c) by Chief Executive Officer upon proposal of the Financial Benchmarks Committee for other Financial Benchmarks owned by Borsa İstanbul, and
- d) by Chief Executive Officer upon assent or demand of the related organisation owning the related Financial Benchmarks for other Financial Benchmarks not owned by Borsa İstanbul.

5. Financial Benchmarks Committee

(1) Borsa İstanbul establishes and appoints a Financial Benchmarks Committee (The Committee) in order to perform the control and oversight functions described in Article 8 “Control Framework” and Article 9 “Internal Oversight” of Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles, and to form and develop opinions and proposals for submission to the Decision-making Authority on all and any issues that may be included in the scope of control and oversight of Financial Benchmarks.

(2) Financial Benchmarks Committee is comprised of:

- a) Index Director, due to being responsible for continuity of Financial Benchmarks, and
- b) Director to whom the Index Applications Service reports, due to being responsible for the technological infrastructure of calculation and publishing of Financial Benchmarks, and
- c) Market Operations Directors, due to being responsible for the transaction rules of capital market instruments included in the scope of the related Financial Benchmarks.

(3) The Committee members take office upon giving a statement by using the text shown in Annex 1 verifying that they are free from any conflicts of interests in respect of all processes, including the processes of creation, calculation, dissemination and accountability of Financial Benchmarks under Administration of Borsa İstanbul. If any member fails to give this statement, then, the Chief Executive Officer appoints a service manager of the same Directorate qualified to give the statement to the Financial Benchmarks Committee until the related Director gives this statement.

(4) The Committee members are deemed to have been dismissed and removed from The Committee if they resign from their job duty underlying their membership in The Committee or if they enter into a conflict of interests in respect of any processes, including the processes of creation, calculation,

dissemination and accountability of Financial Benchmarks. Conflicts of interest are determined upon a declaration of member or a decision of the Chief Executive Officer.

(5) The Committee is chaired by the member representing the Index Directorate, and its secretariat duties are performed by the Index Directorate.

(6) The Committee meets with presence of at least three members having the right to vote on the agenda topics determined for its meeting, also including The Committee chairperson, and takes its decisions by affirmative vote of majority of its members present in the meeting and having the right to vote therein. Meetings may be held, and decisions taken in meetings may be approved, also by such communication means and methods as telephone, video conference and e-mail.

(7) Market Operations Directors may vote only for the agenda topics on Financial Benchmarks regarding their own markets and for the agenda topics which are not specifically and exclusively related to a certain market. In the case of equality of votes, The Committee chairperson has a casting vote. Whether or not agenda topics are specifically and exclusively related to a certain market and/or to which market they are related are decided by The Committee chairperson.

(8) The Committee meets at least once every four months. The meeting agenda and date are determined by The Committee chairperson, and are shared with The Committee members via electronic media a reasonable time before the meeting, by also taking into consideration the content of meeting agenda topics. In exceptional circumstances or emergencies, any one of The Committee members may request The Committee chairperson to call The Committee for a meeting. Thereupon, The Committee chairperson considers the request, and if deemed fit, calls The Committee for a meeting.

(9) In its decision-making process, The Committee may ask opinions of not only the Borsa İstanbul units and persons, but also the other organisations and persons to the extent allowed by the applicable laws pertaining thereto.

(10) Working Procedures and Principles of The Committee are given in Annex 1 hereof.

6. Determination, Creation, Calculation and Dissemination of Financial Benchmarks

6.1. Determination and Announcement of Financial Benchmarks

(1) Financial Benchmarks qualified for Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles are determined by the Decision-making Body upon proposal of the Committee.

(2) Borsa İstanbul announces and publishes in its corporate web site its Financial Benchmarks qualified for Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles.

6.2. Reliability and Integrity of Financial Benchmarks

(1) For the sake of reliability and integrity of Financial Benchmarks, Borsa İstanbul calculates and publishes its Financial Benchmarks by means of appropriate software and hardware systems, and includes the data used in calculation of Financial Benchmarks into its calculations after checking them as far as possible.

(2) Borsa İstanbul backs up all of its software and hardware systems employed in all processes, also including the creation, calculation and publishing of Financial Benchmarks.

(3) Borsa İstanbul permits only the authorized users to have access to its software and hardware systems employed in all processes, also including the creation, calculation and publishing of Financial Benchmarks, and keeps records of all and any accesses thereto.

(4) Borsa İstanbul keeps in appropriate media all and any values calculated and published in respect of Financial Benchmarks, and all and any records of changes relating to their creation, calculation and dissemination.

6.3. Operational Risks in Calculation and Dissemination of Financial Benchmarks

(1) Borsa İstanbul procures the inputs used in calculation of Financial Benchmarks from their sources as far as possible, by means of appropriate software systems, without human interference, and in the case of manual data input in the course of the calculation and publishing processes, definitely applies the Four Eyes Principle therein.

(2) In its transactions performed for the sake of continuity of Financial Benchmarks, Borsa İstanbul uses only data procured by means of appropriate software programs and/or by application of the Four Eyes Principle, and shares its pre-transaction and post-transaction reports with the Subscribers.

(3) Borsa İstanbul tests the algorithm, software and configuration changes regarding the calculation and dissemination of Financial Benchmarks only in appropriate media and with participation of all related parties, and takes into operation in the form of planned versions only the developments and changes which successfully pass the testing process.

(4) For the sake of business continuity in emergencies, Borsa İstanbul organises and holds regular drills with participation of all related parties.

6.4. Integrity of Inputs Used in Financial Benchmarks

(1) Borsa İstanbul takes care to use only the data which best reflect the changes aimed to be measured by Financial Benchmarks, and to make sure that the data used thereinfor are based on the executed transactions. Borsa İstanbul may, however, use in its calculations also the data which are not based on transactions, in absence of transactions executed in its own markets and platforms or in other markets and platforms, or if it believes that such data will better reflect the changes aimed to be measured by Financial Benchmarks.

(2) If deemed necessary, Borsa İstanbul may take opinions of potential Stakeholders in the course of determination of the inputs to be used in calculations of Financial Benchmarks.

(3) Borsa İstanbul examines the historical values of data intended to be used in determination of the data which best reflect the changes aimed to be measured by Financial Benchmarks, and determines the measures and actions to be taken in response to probable problems, by also taking into account the consistency of data, the usability of extreme values, the potential data inadequacies, the probable delays, and the reliability and neutrality of data source, and builds the required warning and alarm systems in connection therewith, also including emergency plans.

6.5. Employees Involved in Calculation of Financial Benchmarks

(1) Borsa İstanbul ensures that the employees involved in the processes of calculation of Financial Benchmarks have a specialization and knowledge level fit to their job definitions, and assigns only the employees having the following basic skills and competences for the processes of calculation of Financial Benchmarks:

- a) To be graduated from Divisions of universities, faculties or academies with a curriculum of minimum 4 years and clearly named in Borsa İstanbul A.Ş. Human Resources Directive, and
- b) To be graduated from an undergraduate program with 100% English medium education system, or to score at least 75 or its equivalent in English language in YDS/e-YDS exams, and
- c) To pass recruitment exam organised by Borsa İstanbul as an exam open to the general public, and
- d) To be able to use at least one of Microsoft Excel or VBA, SQL, Python and similar other programming languages, and
- e) To have analytical thinking ability, effective communication skill and holistic view, and to be quality-focused, team-player, open to change, and customer-oriented.

(2) Borsa İstanbul assigns only employees having adequate experience in calculation of Financial Benchmarks for the processes of calculation of Financial Benchmarks. Accordingly, the Exchange ensures that at least 1/2nd of the employees involved in the processes of calculation of Financial Benchmarks have a past experience of 4 years or more in this field.

(3) Borsa İstanbul provides the employees with local and foreign training and development opportunities in order to meet the corporate needs and requirements and the career expectations of employees and for encouragement of R&D activities, and promotes the employees to take and hold capital markets licenses and other internationally accepted certificates for financial markets.

6.6. Outsourcing of Services in Creation and Calculation of Financial Benchmarks

6.6.1. Outsourcing of Services

(1) Borsa İstanbul may outsource services in the creation of Financial Benchmarks, and may get from external sources the data needed, also including prices, returns or rates, for use in the calculation of Financial Benchmarks.

(2) Outsourcing of services under a contract in the course of creation of Financial Benchmarks, and acquisition of data, also including prices, returns and rates, under a contract for use in calculation of Financial Benchmarks are considered and treated as outsourcing of services within the scope of this Procedure.

(3) The use of data, also including prices, returns and rates, collected from sources made public in the calculation of Financial Benchmarks without need for any contract is not considered and treated as outsourcing of services within the scope of this Procedure.

(4) Where the party from which services are outsourced in the creation of Financial Benchmarks or of which data are used in the calculation of Financial Benchmarks is an organised market, exchange or an organisation duly authorised by law for provision of the related services or data, Borsa İstanbul may not carry out its processes determined in this Procedure.

6.6.2. Components of Service Procurement Agreements

(1) Agreements entered into with regard to transactions considered and treated as outsourcing of services under this Procedure are required to be in compliance with Borsa İstanbul A.Ş. Procurement Directive and Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles. These agreements incorporate not only clauses regarding the service outsourcing and data submission relations to be established, but also clauses pertaining to:

- a) The roles and responsibilities of Borsa İstanbul and the third parties, and

- b) Oversight of, and standards required to be complied with by, the third parties in such manner to cover also the power of access to information, documents and sources relating to the purchased services, and
- c) Measures and actions required to be taken, also including emergency plans, in order to eliminate the operational risks, and
- d) Processes and methods of material changes or revisions in clauses of agreement, and
- e) Termination of services.

6.6.3. Oversight of Third Parties

(1) Borsa İstanbul is responsible for oversight of third parties or submitters in respect of the creation or calculation of Financial Benchmarks.

(2) For the sake of oversight of third parties, Borsa İstanbul may ask third parties or Submitters to disclose and furnish the following information and documents limited solely to the services or data procured from them:

- a) Their administration, operations, data entry/exit, business continuity and emergency plans, and
- b) Past disciplinary records of employees included in the team providing the services or data hereunder, and
- c) A statement as to existing and potential probable conflicts of interests, and
- d) A statement as to job experiences of employees included in the team providing the services or data hereunder, and
- e) Legal documents and certificates relating to their business activities.

(3) Information and documents to be requested from third parties or submitters, including, but not limited to, the items listed in the preceding paragraph, and method of disclosure of them are to be decided by the Decision-making Body upon proposal of the Committee. Where the service providers do not have any practices or regulations in connection therewith, Borsa İstanbul may request them to comply with its own practices or regulations pertaining thereto.

(4) In the course of oversight of third parties, The Committee provides the Decision-making Body for decision purposes with its assessment also including its opinions regarding the steps required to be taken for the sake of assurance of quality and continuity of outsourced services or data, and the frequency of said steps (at least once a year).

6.6.4. Disclosure of Third Parties

(1) Borsa İstanbul discloses in the Methodology of the related Financial Benchmarks such information as the scope of services or data procured in the course of creation and calculation of Financial Benchmarks, third parties or Submitters, and the roles of third parties or Submitters in the creation and calculation of Financial Benchmarks.

7. Changes in the Methodology of Financial Benchmarks

7.1. Determination of Information Requesting Parties in Changes

(1) Borsa İstanbul builds an appropriate infrastructure in the corporate web site for the purpose of determination of Subscribers, Stakeholders and other relevant natural persons or legal entities requesting information in case of material changes in the Methodology of Financial Benchmarks.

(2) Accordingly, with a form to be incorporated in its corporate web site, Borsa İstanbul sets down the identity and communication data of the relevant natural persons and legal entities, and the Financial Benchmarks about which they request information. The relevant natural person or legal entity is responsible to make sure that the information disclosed in the form is up-to-date.

7.2. Material Changes

(1) Changes or revisions in Methodology which are made in the calculation formula or method of a Financial Benchmark, or in the method used for determination of its components, or in data types used in its calculation, or in its weight adjustment method and calculation, or if Submissions are used, in data submission method reducing the representativeness of Submitters, and/or which exert material and significant effects on the past and future performance of Financial Benchmarks, other than the changes mentioned hereinabove, are considered and treated as material changes.

7.3. Justification of Material Changes

(1) Borsa İstanbul may make material changes in the Methodology due to changes in the definition of Financial Benchmarks, failure of Financial Benchmarks to represent the changes aimed to be measured, lack of minimum components needed for calculation of them, data insufficiency, or changes in applicable laws or market structure, or for other reasons.

7.4. Determination of Material Changes

(1) Changes or revisions in the Methodology of Financial Benchmarks may be requested by Licensed Users, Stakeholders, Regulatory Authority, Market Authority, National Authority, Borsa İstanbul units or other natural persons or legal entities, and for Financial Benchmarks not owned by Borsa İstanbul, also by the organisation owning the related Financial Benchmarks.

(2) Needs for changes in the Methodology of Financial Benchmarks may also arise out of periodic or non-periodic reviews performed in the course of oversight of Financial Benchmarks.

(3) The Committee evaluates and assesses the requests of change received from the aforementioned natural persons or legal entities in respect of the Methodology of Financial Benchmarks, and the needs for changes therein arising out of periodic or non-periodic reviews, and presents its assessment to the Decision-making Body for decision purposes in such manner to cover also its opinion as to whether the change is material or not.

7.5. Collection of Opinions on Material Changes, and Publishing of Collected Opinions and Final Decision

(1) Borsa İstanbul publishes in the corporate web site the definition of change made by The Committee, the potential consequences of change, the draft text of change together with justification thereof, the platform through which opinions may be submitted in electronic media, and the period for collection of opinions, not being less than fifteen days, together with the draft schedule and methodology determined by the Decision-making Body in relation therewith.

(2) Borsa İstanbul sends the announcement published in the corporate web site in connection therewith by e-mail also to those who request information in the case of material changes.

(3) Borsa İstanbul collects the opinions regarding draft texts of change, together with their privacy preferences as to disclosure or non-disclosure of opinions to public.

- (4) Borsa İstanbul shares the collected opinions with TLREF Committee for TLREF Rate and TLREF Index, and with BIST-KYD Indices Committee for BIST-KYD Indices, and with the organisation owning the relevant Financial Benchmarks for Financial Benchmarks not owned by Borsa İstanbul, depending on the qualification of Financial Benchmarks subject to material change.
- (5) Borsa İstanbul announces and publishes the opinions collected for Financial Benchmarks in the corporate web site in accordance with the declared schedule, and by remaining loyal to the privacy preferences as to disclosure or non-disclosure of opinions to public, without prejudice to the applicable laws and regulations governing Borsa İstanbul.
- (6) Material changes are finally concluded by the Decision-making Body after evaluation and assessment of the collected opinions as well.
- (7) Final decision taken in regard to the material change is announced in the corporate web site in accordance with the declared schedule. If the decision is in favour of making a material change in the Methodology, it also contains the effective date of such material change.

7.6. Non-material Changes

- (1) Methodology of Financial Benchmarks may also be revised by changes not considered and treated as a material change under this Procedure.
- (2) The Committee evaluates and assesses the requests of change in respect of the Methodology of Financial Benchmarks, and the needs for changes therein arising out of periodic or non-periodic reviews, and presents its assessment to the Decision-making Body for decision purposes in such manner to cover also its opinion as to whether the change is material or not.
- (3) Borsa İstanbul publishes the new Methodology containing non-material changes in corporate web site before putting the changes into practice, and separately gives information by e-mail to those requesting information in the case of changes.

7.7. Urgent Material Changes

- (1) Borsa İstanbul may make urgent material changes in the Methodology of Financial Benchmarks for the sake of continuity of Financial Benchmarks.
- (2) In the urgent material changes to be made in the Methodology of Financial Benchmarks, the procedures and principles set down in Article 7.6 titled “Non-material Changes” of this Procedure are followed.

7.8. Review of Definition and Methodology of Financial Benchmarks

- (1) In order to determine whether the Financial Benchmarks reflect the changes aimed to be measured or not, Borsa İstanbul reviews the definition and the Methodology of Financial Benchmarks through The Committee at least once a year.

8. Cessation of Financial Benchmarks

8.1. Reasons of Cessation

- (1) Borsa İstanbul may cease Financial Benchmarks due to changes in the definition of Financial Benchmarks, failure of Financial Benchmarks to represent the changes aimed to be measured, lack of minimum components needed for calculation of them, data insufficiency, or changes in applicable laws or market structure, or for other reasons.

(2) Borsa İstanbul may also cease Financial Benchmarks not owned by Borsa İstanbul, upon and in line with a demand of the organisation owning the relevant Financial Benchmarks, if deemed fit and acceptable.

(3) Borsa İstanbul may also cease Financial Benchmarks owned or not owned by Borsa İstanbul, upon and in line with a demand of the Regulatory Authority.

8.2. Cessation of Non-critical Financial Benchmarks

(1) Upon occurrence of conditions specified in Article 8.1 titled “Reasons of Cessation” of this Procedure for Non-critical Financial Benchmarks, The Committee evaluates and assesses the conditions, and provides the Decision-making Body for decision purposes with its assessment also containing the following information:

- a) Potential effects of cessation on economic and financial stability, also including information as to whether there are financial products or contracts based on the Financial Benchmarks the calculation of which will be terminated; and
- b) If needed and if and to the extent possible, explanations prepared about the alternative Financial Benchmarks which may substitute the Financial Benchmarks which will be ceased, by also taking into account the provisions of Article 8.5 titled “Determination of Alternative Financial Benchmarks in the Case of Cessation” of this Procedure; and
- c) Procedures and principles determined in accordance with Article 7 titled “Changes in the Methodology of Financial Benchmarks” of this Procedure, also including the collection of opinions of Stakeholders, Regulatory Authority or National Authorities with regard to the handling of the process of cessation of Financial Benchmarks; and
- d) If alternative Financial Benchmarks are determined within the frame of Article 8.5 titled “Determination of Alternative Financial Benchmarks in the Case of Cessation” of this Procedure, feasibility of calculation of the Financial Benchmarks which will be ceased, together with such alternative Financial Benchmarks, and if alternative Financial Benchmarks cannot be determined as above, the methods to be followed. (Said methods are determined by taking into consideration the probable effects of termination of calculation of the relevant Financial Benchmarks on economic and financial balances, and the prevalence and depth of financial products based on said Financial Benchmarks.)

8.3. Cessation of Critical Financial Benchmarks

(1) Upon occurrence of conditions specified in Article 8.1 titled “Reasons of Cessation” of this Procedure for Critical Financial Benchmarks, The Committee evaluates and assesses the conditions, and provides the Decision-making Body for decision purposes with its assessment also containing the information listed in Article 8.2 of this Procedure.

(2) Thereupon, the Decision-making Body carries out the following processes in addition to the processes described in Article 8.2 titled “Cessation of Non-critical Financial Benchmarks” of this Procedure:

- a) The Regulatory Authority is urgently informed thereabout; and
- b) Within four weeks after the Regulatory Authority is informed as above, the process of transition or termination of calculation, also including the calculation of the related Financial Benchmarks by another Manager, is planned and scheduled for a maximum time of two years, together with Regulatory Authority, National Authorities and Stakeholders; and

- c) The related Financial Benchmarks are continued to be calculated until the end of the process of transition or cessation scheduled as above for a maximum time of two years.

8.4. Urgent Cessation

- (1) Borsa İstanbul may urgently cease Financial Benchmarks if and when the calculation becomes impossible or because of an emergency.
- (2) Decision on urgent cessation is taken by the Decision-making Body upon proposal of The Committee. For the urgent cessation process, the procedures and principles set down in Article 7.7 titled “Urgent Material Changes” of this Procedure are followed.
- (3) In accordance with Article 8.5 titled “Determination of Alternative Financial Benchmarks in the Case of Cessation” of this Procedure, if needed and if and to the extent possible, Borsa İstanbul informs the Stakeholders about the Financial Benchmarks which may be an alternative to the Financial Benchmarks the calculation of which will be urgently terminated, or if such Financial Benchmarks cannot be determined, its explanations about procedures that may be followed.

8.5. Determination of Alternative Financial Benchmarks in the Case of Cessation

- (1) If needed and if and to the extent possible, Borsa İstanbul tries to determine Financial Benchmark or Benchmarks which may be an alternative to the Financial Benchmarks which will be ceased, but does not accept or assume any responsibility in advance in connection therewith.
- (2) In order to be able to determine appropriate Financial Benchmarks which may be an alternative to the Financial Benchmarks which will be ceased, Borsa İstanbul tries to determine and set down through The Committee the basic features of the Financial Benchmarks which will be ceased, and their differences from other Financial Benchmarks, and to which extent they meet the needs and demands of Stakeholders, and whether there are financial products or contracts based on the Financial Benchmarks which will be ceased, and if any, their maturity, and other Benchmarks which may be helpful in selection of alternative Financial Benchmarks. Upon completion of this determination, The Committee submits a report containing its assessment regarding the potential alternative Financial Benchmarks to the Decision-making Body for decision purposes, in such manner to also include its opinions and comments as to basic features of such alternative Financial Benchmarks, and to which extent they meet the needs and demands of Stakeholders, and whether they have transparent transaction data or not, and whether they are investable or not, and their effects on Stakeholders, and the effects of applicable laws and regulations thereon.
- (3) For the sake of a smooth and orderly process of transition to a new Financial Benchmark, Borsa İstanbul tries through The Committee to determine the calculability of the Financial Benchmark which will be ceased, together with alternative Financial Benchmarks, as well as the period of calculation thereof. In determining the period of calculation of the Financial Benchmark which will be ceased, together with alternative Financial Benchmarks, up to not more than 2 years in the case of the Financial Benchmark which will be ceased being a Critical Financial Benchmark, or not more than 1 year in the case of the Financial Benchmark which will be ceased being a Non-critical Financial Benchmark, The Committee takes into account the opinions of Stakeholders, Subscribers and related Market Authorities and National Authorities as well, if and to the extent it is fit and feasible. At the end of this determination, The Committee provides the Decision-making Body for decision purposes with its assessment as to calculability of the Financial Criterion which will be ceased, together with alternative Financial Benchmarks, as well as the period of calculation thereof.

(4) Borsa İstanbul may fail to determine different Financial Benchmarks which may be an alternative to the Financial Benchmark which will be ceased. However, Borsa İstanbul publishes in the corporate web site the information about Financial Benchmarks calculated by itself. Thereafter, by using such information, Subscribers and Stakeholders may themselves determine and choose alternatives to the Financial Benchmark which will be ceased.

(5) Borsa İstanbul requests Stakeholders and Subscribers to incorporate in their contracts and financial products, where they use Financial Benchmarks, certain provisions of transition or termination applicable in the case of cessation, and to be aware of the fact that material changes may be made in Financial Benchmarks, and to take the required measures in connection therewith.

9. Rules Required to be Complied with by Submitters

9.1. Use of Submissions

(1) In its calculations of Financial Benchmarks, Borsa İstanbul may use Submissions provided by Submitters, and in this case, Borsa İstanbul makes sure as far as possible that the Submitters correctly represent all participants, by also taking into consideration the changes aimed to be measured by Financial Benchmarks.

(2) In its calculations of Financial Benchmarks, Borsa İstanbul uses Submissions procured and collected as per the agreements entered in accordance with this Procedure.

(3) Borsa İstanbul takes care to ensure that the Submissionsto be used in calculations of Financial Benchmarks are based on the observable transactions or orders executed between buyers and sellers in such manner to reflect the market conditions, and if an Expert Judgment is used by the Submitters, the details thereof are also taken into consideration, and the data are presented in accordance with the specified data hierarchy, and the Submitters are competent enough to provide such types of data continuously.

(4) If Submissions are used in calculation of Financial Benchmarks, Borsa İstanbul incorporates in the Methodology of the related Financial Benchmarks such information as the Submissions used therein, and at which frequency the Submissionsare received, and the Submitters.

(5) The Committee provides the Decision-making Body for decision purposes with its assessment as to selection of Submissionsto be used in calculation of Financial Benchmarks, and at which frequency such data are required to be received, and determination of Submitters who will disclose such data. In formulating its assessment, The Committee may consult to Stakeholders and other parties deemed to be relevant for getting their opinions thereon.

(6) If Submissions are used in calculation of Financial Benchmarks, in order to proactively detect the potential mistakes, Borsa İstanbul incorporates such Submissions into its calculations only after controlling them as far as possible. These controls cover also a determination as to whether said data are extreme values or not, and they are compliant and coherent with the general trend or not.

(7) Borsa İstanbul:

- a) Takes identity and communication data of the Submitter organisations or the employees providing such data in the name of organisation, and confirms and verifies whether natural persons acting for and on behalf of an organisation are really authorized to provide such data in the name of their organisation: and
- b) Asks the Benchmarks to be applied by the Submitter organisations to their employees authorized to provide data and information to Borsa İstanbul.

(8) Borsa İstanbul requests the Submitters to give a statement verifying their compliance with this Procedure at least once a year.

9.2. Termination of Submissions

(1) Submissions are essentially required to be submitted by Submitters as long as the calculation of related Financial Benchmarks is continued or until alternative data are procured or provided.

(2) Borsa İstanbul requests the Submitters to inform Borsa İstanbul without delay the occurrence of any conditions or incidents necessitating the termination of Submissions, and thereafter, to continue providing said data for a minimum period of 90 days following said notification.

(3) Upon occurrence of any conditions or incidents necessitating the termination of Submissions, The Committee presents its assessments pertaining thereto to the Decision-making Body for decision purposes.

(4) The Decision-making Body sets down the procedures and principles to be followed, also including the submission of alternative data or the termination of calculation of Financial Benchmarks.

9.3. Roles and Responsibilities in Submissions

(1) Borsa İstanbul incorporates in the agreements signed by it such clauses stating and verifying that the Submitters are responsible for the kind and qualification of Submissions provided by them, and for their being complete, true and reliable, and for continuity thereof, and for their transmission on time and by predetermined methods, and for their storage under appropriate conditions, and uses said Submissions only after making appropriate and feasible controls on them.

(2) Borsa İstanbul requests Submitters to furnish to Borsa İstanbul the following information and statements about their employees involved in the process of Submissions:

- a) First name, surname and communication data, and their job positions on the organisation, and the roles played by them in the data submission process; and
- b) Statements as to real, perceived and potential conflicts of interests limited solely to the data submission process; and
- c) Statements verifying that they have abilities, know-how, education and professional skills needed for administration of the data submission process,

and to renew such notification in the case of a change in the roles or statements of any of their employees involved in the process, or in the case of replacement of any of their employees.

9.4. Internal Control and Audit Systems of Submitters

(1) Borsa İstanbul requests Submitters to build their own internal control and audit systems, covering the following items, also including the prevention and administration of the conflicts of interest, for the sake of healthy conduct of the data submission process, and to deliver to Borsa İstanbul their regulations relating to said systems, and in the case of a change or revision in the related regulations, to renew such notification:

- a) Methods in respect of data submission, also including the rules aimed at determining the data type compliant with the Methodology of Financial Benchmarks; and
- b) Methods aiming to detect, determine and assess the suspicious data or transactions (also including the in-group transactions), and to assure the truth and correctness of data; and
- c) Policies regarding the keeping of records; and

- d) Policies concerning the validations required to be done before submission of data, and review of the same for more than once by employees having adequate technical knowledge and experience; and
- e) Reporting of suspicious data inputs; and
- f) In-house processes in relation with completion of data submission; and
- g) Whistleblowing and reporting mechanisms in compliance with Article 8 “Control Framework” of Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles; and
- h) Assessment in terms of conflicts of interest of the in-house processes relating to review of the data to be provided and completion of data submission process.

9.5. Submitter Code of Conduct

(1) Borsa İstanbul requests Submitters to build and formulate their own policies relating to prevention and administration of conflicts of interests, covering the following items, for the sake of healthy conduct of the data submission process, and to deliver to Borsa İstanbul their documents relating to said policies, and in the case of a change or revision in the related documents, to renew such notification:

- a) Determination of roles and duties of the employees in critical positions, and of their span of authority and responsibility; and
- b) Mechanisms aiming to prevent and manage the conflicts of interest; and
- c) Regulations intending to position the employees and reporting authorities involved in the data submission process physically separate from each other as far as possible; and
- d) Methods for making assessments as to how the existing or potential inducing acts intending to manipulate the data or to influence them otherwise will be detected, described, managed, reduced and prevented (also including the development of appropriate remuneration policies, and effective handling and resolution of probable conflicts of interest that may arise between data submission activity and other commercial activities of Submitter and its subsidiaries or their customers).

9.6. Training of Submitters’ Employees

(1) Borsa İstanbul requests Submitters to place emphasis on training of their employees involved in submission process for the sake of healthy conduct of the data submission process, and to this end, to report to Borsa İstanbul regularly every year:

- a) Their regulations on Financial Benchmarks, and their training activities focused on the related regulations, also including market abuse, and
- b) Their training activities aiming to ensure that their employees are equipped by the abilities, knowledge and professional skills needed for conduct of the process.

9.7. Prevention of Frauds by Submitters

(1) Borsa İstanbul requests Submitters to form and build appropriate processes for detection of frauds that may be committed in data submission, and for imposition of disciplinary sanctions applicable on their employees involved in said frauds, and to report to Borsa İstanbul as soon as possible all of the acts of fraud detected in the course of data submission, and following completion of the process conducted on the fraud, to give information to Borsa İstanbul about the results of disciplinary process, and corrective actions and decisions, and remedial applications.

(2) Upon occurrence of frauds in data submission, The Committee urgently handles and discusses the issue, and the Decision-making Body determines the procedures and principles to be followed, also including the termination of alternative data submission or Financial Benchmarks calculation.

9.8. Keeping of Records by Submitters

(1) Borsa İstanbul requests Submitters to keep:

- a) Methods and rules setting down the submission of data; and
- b) Information on persons who procure, produce or disclose the data to Borsa İstanbul; and
- c) Names and positions of persons who are in charge of submission and oversight of data; and
- d) Records of negotiations and communications among data submitters; and
- e) Records of communication with Borsa İstanbul; and
- f) Questions received from external parties in respect of the data provided to Borsa İstanbul, and
- g) Statements relating to conflicts of interests regarding the products using the Financial Benchmarks and to positions assumed therein; and
- h) Sizes of positions managed on the Financial Benchmarks-based products in order to facilitate the audits and examinations, on the basis of related Units and employees; and
- i) If any, internal and external audit findings, and remedial measures taken in respect of said findings, and stages of implementation thereof.

for a minimum period of 5 years, unless otherwise required as per the legal and administrative regulations pertaining thereto.

9.9. Audit of Submitters

(1) Borsa İstanbul tracks, checks and records whether Submitters comply with this Procedure and the rules determined by agreement, and reviews the same through the Committee at least once a year. The Committee furnishes to the Decision-making Body its opinions also including its assessment as to whether Submitters comply with this Procedure and the rules determined by agreement.

(2) The Chief Executive Officer may, if deemed necessary, assign the Audit and Surveillance Board for auditing and checking whether Submitters comply with this Procedure and the rules determined by agreement.

10. Prevention of Conflicts of Interest in Financial Benchmarks

(1) Details pertaining to prevention of conflicts of interest in Financial Benchmarks are regulated in the “Borsa İstanbul. A.Ş. Procedure on Prevention of Conflicts of Interest in Financial Benchmarks”, while details regarding prevention of conflicts of interest under oversight of third parties and Submitters are regulated in this Procedure.

(2) The Committee reviews and examines at least once a year the features of Financial Benchmarks, and their targeted, expected or known purposes of use, and the level of significance of the detected existing or potential conflicts of interest, and presents its assessment thereon to the Decision-making Body.

(3) Where conflicts of interest arise out of or due to activities performed or actions taken by shareholders of Borsa İstanbul, or those who hold administration of Borsa İstanbul under control, or Borsa İstanbul and/or any one of its affiliates, The Committee reviews and assesses the conditions at least once a year. If The Committee confirms the existence of a conflict of interest therein, The Committee provides the Chief Executive Officer for decision purposes with its resulting assessment in such manner to contain its proposal as to establishment of an independent oversight body where

the Stakeholders, Subscribers and other Submitters about whom Borsa İstanbul has information are represented in a balanced manner, and which will operate and work in such manner to eliminate the resulting conflicts of interest.

11. Accountability in Financial Benchmarks

(1) Details on the notices and complaints as to whether the Financial Benchmarks reflect the changes aimed to be measured by them or not, and whether the Financial Benchmarks are calculated in accordance with the specified Methodology or not, and other decisions and applications of Borsa İstanbul relating to calculations of Financial Benchmarks are regulated and set out in the “Borsa İstanbul A.Ş. Whistleblowing Procedure for Financial Benchmarks” and the “Borsa İstanbul A.Ş. Complaint Procedure for Financial Benchmarks”.

(2) The frequency of audits to be performed on the processes of calculation of Financial Benchmarks, and the Methodology of these processes, and their compliance with Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles is determined in proportion to the size and the level of complexity of activities relating to Financial Benchmarks. The Audit and Surveillance Board reports to the Chief Executive Officer its findings determined as a result of audit, together with its proposals on remedial measures.

(3) The Chief Executive Officer may, if deemed necessary, order an external audit in order to get information about the problems and risks relating to Financial Benchmarks, and may assign the Committee for assessment of results of internal audit and if performed, results of external audit, as well as the implementation of remedial measures.

(4) All records relating to the processes of creation, calculation, publishing and accountability of Financial Benchmarks are kept for a minimum period of 5 years, unless otherwise required as per the legal and administrative regulations pertaining thereto.

12. Review

(1) This Procedure is reviewed by the Committee at least once a year.

13. Subjects on Which the Procedure Remains Silent

(1) On subjects on which this Procedure remains silent or is not adequately clear, the Chief Executive Officer is authorized to take the necessary decisions, and to regulate and direct the practices within the frame of the pertinent regulations.

14. Miscellaneous and Final Provisions

(1) This Procedure does not constitute a part of the agreements of Borsa İstanbul with its existing or potential Stakeholders, and cannot be construed so as to grant any contractual rights or to impose any obligations to said beneficiaries, and does not create any rights or interests for third parties.

15. Effective Date

(1) This Procedure becomes effective as of the date it is promulgated.

16. Enforcement

(1) The provisions of this Procedure are enforced and executed by the Chief Executive Officer.

ANNEX 1: Working Procedures and Principles of Borsa İstanbul Financial Benchmarks Committee

Composition and Structure of Committee

The Committee is comprised of:

- Index Director, and
- Director to whom the Index Applications Service reports, and
- Equity Market Operations Director, and
- Debt Securities Market Operations Director, and
- Derivatives Markets Operations Director, and
- Precious Metals and Diamond Market Operations Director.

The Committee Members take office only after signing a Statement Form, given in the Annex, verifying that they are not a party to any conflicts of interest in relation to all and any processes, including the processes of creation, calculation, dissemination and accountability of Financial Benchmarks, under administration of Borsa İstanbul. If any member fails to give this statement, then, the Chief Executive Officer appoints a Service Manager of the same Directorate qualified to give the statement to the Financial Benchmarks Committee until the related Director gives this statement.

The Committee members are deemed to have been dismissed and removed from The Committee if they resign from their job duty underlying their membership in the Committee or if they enter into a conflict of interests in respect of any processes, including the processes of creation, calculation, publishing and accountability of Financial Benchmarks. Conflicts of interest are determined upon a declaration of member or a decision of the Chief Executive Officer.

The Committee is chaired by the member representing the Index Directorate, and its secretariat duties are performed by the Index Directorate.

Grounds

Working Procedures and Principles of Financial Benchmarks Committee are prepared and issued within the frame of the related articles of Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles and Borsa İstanbul A.Ş. Financial Benchmarks Management Procedure (Procedure).

Duties and Responsibilities of The Committee

Duties and responsibilities of the Financial Benchmarks Committee are basically comprised of formation and development of opinions regarding:

- Determination and announcement of Financial Benchmarks, and
- Creation of Financial Benchmarks, and
- Determination of Methodology, and
- Calculation of Financial Benchmarks, and
- Publishing and dissemination of Financial Benchmarks, and
- Conduct of related operations, and
- Performance of oversight function within the frame of Article 9 of Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles, and

- Features of Financial Benchmarks, and their targeted, expected or known purposes of use, and the level of significance of the detected existing or potential conflicts of interest, and
- Outsourcing of services and/or data submission in creation and calculation of Financial Benchmarks, and
- Steps required to be taken for the sake of assurance of quality and continuity of outsourced services and/or data submission for use in calculation of Financial Benchmarks, and the frequency of said steps, and
- Components of service outsourcing agreements, and
- Requests received from stakeholders for changes in the Methodology, and changes to be made as a result of periodic or non-periodic reviews, and whether the changes to be made are material or not, and
- Review of the definition and Methodology of Financial Benchmarks in order to determine whether they reflect the changes aimed to be measured by them or not, and
- Cessation of Financial Benchmarks, and
- If Financial Benchmarks are ceased, determination of alternative Financial Benchmarks, and
- If Financial Benchmarks are calculated by using Submissions, determination of the Submission which best reflect the changes aimed to be measured by Financial Benchmarks, and the Submitters, and
- The rules required to be complied with by the Submitters in calculation of Financial Benchmarks, and termination of Submission, and
- Assessment as to whether Submitters comply with the rules set down in the Financial Benchmarks Management Procedure and in the agreement in calculation of Financial Benchmarks, and
- Administration, together with the related Units of Borsa İstanbul, of conflicts of interest which arise during performance of the processes and are reported to the Financial Benchmarks Committee,

for reporting and submission to the Decision-making Body referred to in Article 4 of Borsa İstanbul A.Ş. Financial Benchmarks Management Procedure.

Working Procedures and Principles of the Committee

- The Committee meets with presence of at least three members having the right to vote on the agenda topics determined for its meeting, also including The Committee chairperson, and takes its decisions by affirmative vote of majority of its members present in the meeting and having the right to vote therein. Meetings may be held, and decisions taken in meetings may be approved, also by such communication means and methods as telephone, video conference and e-mail.
- Market Operations Directors may vote only for the agenda topics on Financial Benchmarks regarding their own markets and for the agenda topics which are not specifically and exclusively related to a certain market. In the case of equality of votes, The Committee chairperson has a casting vote. Whether or not agenda topics are specifically and exclusively related to a certain market and/or to which market they are related are decided by The Committee chairperson.
- The Committee meets at least once every four months. The meeting agenda and date are determined by The Committee chairperson, and are shared with The Committee members via electronic media a reasonable time before the meeting, by also taking into consideration the content of meeting agenda topics. In exceptional circumstances or emergencies, any one of

The Committee members may request The Committee chairperson to call tThe Committee for a meeting. Thereupon, The Committee chairperson considers the request, and if deemed fit, calls The Committee for a meeting.

- In its decision-making process, The Committee may ask opinions of not only Borsa İstanbul units and persons, but also the other organisations and persons to the extent allowed by the applicable laws pertaining thereto.

Statement Form for Borsa İstanbul Financial Benchmarks Committee Members

I, the Undersigned, hereby declare, state and acknowledge that I have read and understood Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles, and Borsa İstanbul A.Ş. Financial Benchmarks Management Procedure, and Borsa İstanbul A.Ş. Procedure on Prevention of Conflicts of Interest in Financial Benchmarks, and Borsa İstanbul A.Ş. Whistleblowing Procedure for Financial Benchmarks, and Borsa İstanbul A.Ş. Complaint Procedure for Financial Benchmarks, and that I am not a party to any financial or personal, existing or potential conflicts of interest with any organisation, entity or individual in respect of all and any processes, also including the processes of creation, calculation, dissemination and accountability of Financial Benchmarks, under administration of Borsa İstanbul, and that I will avoid all and any conflicts of interest, and upon occurrence of any conflict of interest, I will immediately inform Borsa İstanbul thereabout, and that I will comply with “Borsa İstanbul A.Ş. Procedure on Prevention of Conflicts of Interest in Financial Benchmarks”, and “Information Security Commitment” throughout the term of my membership in Financial Benchmarks Committee.

Signature:

Name and Surname:

Position:

Date: