

Index Family: ECPI GLOBAL COMMODITY GD

Benchmark Statement as of 1-May-2024

The purpose of this disclosure is to outline the information required in Article 27 of the EU regulation on indices used as financial benchmarks ("BMR") and the Commission Delegated Regulation (EU) 2018/1643, 2020/1816, 2020/1817, 2020/1818 and the Benchmarks (Amendment and Transitional Provision) (EU Exit) Regulations n. 657/ 2019.

This document includes clear definitions of the market or economic reality measured by the benchmark and the circumstances in which such measurement may become unreliable, outlines rules around exercise of judgement or discretion and provides some additional information about the benchmark.

This benchmark statement is provided by StatPro as the administrator of the ECPI Index family of indices. This disclosure references and should be read in conjunction with the following methodology and policy documents available at www.confluence.com/index-governance

GENERAL DISCLOSURE

1.1	Date of publication and update	This Benchmark Statement was first published on September 2019; last revision was made on April 2024.
1.2	Review of Benchmark Statement	StatPro is the administrator. StatPro will revise this benchmark statement if material changes are made to the information contained within it, but a review will take place at a minimum of once every two years.
1.3	Use of ISIN	The Index Family is identifiable via Index tickers as no ISINs are assigned
1.4	Contributions of input data	The Index Family does not use contributions of input data.
1.5	Regulated-data benchmark disclosure	The ECPI Indices are not regulated data benchmarks.
1.6	Specific disclosure requirements for significant and non-significant benchmarks	The ECPI Indices includes only non-significant benchmarks according to point 27 of Article 3(1) of Regulation (EU) 2016/1011.

INDEX CHARACTERISTICS

2.1	Market Reality	The ECPI Global Commodity GD Equity Index is an equally weighted equity index designed to offer investors exposure to companies with direct or indirect correlation with the commodities market holding the highest ECPI ESG Rating.
2.2	Use of Discretion	<p>ECPI indices are calculated and rebalanced in accordance with objective rules-based methodologies and do not allow for subjective or discretionary selection of index components. If there were to be exceptional circumstances that are not addressed by either ECPI Equity Benchmarks Calculation Methodology or an administrator policy. Such scenarios might include but are not limited to: (1) Failure of data providers; (2) Significant changes to the underlying market; (3) Complex corporate events; (4) Action by governmental or regulatory bodies that causes market disruption; and (5) Events beyond human control.</p> <p>Then, in the event that the administrator needs to take action or make a decision that has not been foreseen by the methodology or associated policy, senior members of the administration team will consult with the Index Governance Committee to arrive at a decision that is consistent with the objective of the index in question and that causes minimal disruption to index stakeholders. Where appropriate, and reasonably practicable, the administrator may consult with stakeholders. In any event the administrator will make all reasonable efforts to ensure stakeholders are aware that discretion or judgement has been used and how. Additionally, Statpro confirms that the remuneration of the staff responsible for the valuation of the index is not linked to the performance of the financial index.</p>

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INDEX CHARACTERISTICS

2.3	External Factors	StatPro hereby provides notice to users of the ECPI indices that it is possible that circumstances, including external events beyond the control of StatPro, may necessitate changes to, or cessation of, a benchmark or the entire index family.
2.4	Changes to and cessation of benchmark	Any financial contracts or other financial instruments that reference an ECPI benchmark or investment funds which use the ECPI indices to measure their performance should be able to withstand, or otherwise address the possibility of changes to, or cessation of, a benchmark.
2.5	Definitions of key terms	Please refer to ANNEX 1
2.6	Benchmark Methodology	Please refer to Benchmark Family Rule Book and ECPI Equity Benchmarks Calculation Methodology: RULE BOOK and BENCHMARK CALCULATION METHODOLOGY
2.7	Input data	Input data for the ECPI indices consists of official closing prices sourced via market data vendors from eligible stock exchanges. StatPro considers this to be readily available data. None of the indices use any contributed input data.
2.8	Controls over exercise of judgement and discretion	The only circumstances in which judgement and/or discretion may be exercised are set out in response 2.2 above.
2.9	Determination of the benchmark in stress periods	Given the objective and formulaic methodology of the ECPI Index, any limitations are most likely to arise due to external factors. Such factors could include an inadequate availability of market transaction and pricing data, poor quality data or an insufficient number of eligible constituents available for inclusion in the index. In the unlikely event that such periods of stress were prolonged, then it is probable that the Index Governance Committee would consider decommissioning the index or index series. This would be essential if the index was unable to continue to adequately measure the market or economic reality it was intended to evaluate.
2.10	Errors in the input data	ECPI Indices are recalculated whenever errors or distortions occur that are deemed to be significant. Stakeholder of the ECPI indices are notified of any decisions to recalculate and/or restate an index through appropriate media.
2.11	Potential Limitations of the benchmark	(a) & (b) StatPro uses official closing levels for calculation of all the underlying indices of family members, however if data is not available to StatPro due to trade suspensions or market distortions the latest available data is used for calculating the value of an index. This ensures that the value of financial instruments and the pay-offs calculated for financial contracts can be determined. Limitations may also occur due to technical reasons, for example the inability of a stock exchange to publish a close price due to a computer outage. (c) In the unlikely event that such periods of stress were prolonged, then it is probable that the Index Governance Committee would consider decommissioning the index or index series. This would be essential if the index was unable to continue to adequately measure the market or economic reality it was intended to evaluate.

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ADDITIONAL DISCLOSURES - ESG FACTORS

Section 1 - Consideration of ESG Factors

Item 1. Name of the benchmark administrator.	StatPro		
Item 2. Type of benchmark or family of benchmarks.	EQUITY		
Item 3. Name of the benchmark or family of benchmarks.	Index Name	Index Code	Classification
	ECPI Global Commodity GD	GALPHCGP	Non-significant benchmark
	ECPI Global Commodity GD TR	GALPHCGR	Non-significant benchmark
	ECPI Global Commodity GD NTR	GALPHCGN	Non-significant benchmark
Item 4. Are there in the portfolio of the benchmark administrator any EU Climate Transition Benchmarks, EU Paris-aligned Benchmarks, benchmarks that pursue ESG objectives or benchmarks that take into account ESG factors?	<div><input type="checkbox"/> YES</div> <div><input checked="" type="checkbox"/> NO</div>		
Item 5. Does the benchmark or family of benchmarks pursue ESG objectives?	<div><input checked="" type="checkbox"/> YES</div> <div><input type="checkbox"/> NO</div>		
Item 6. Where the response to Item 5 is positive, provide below the details (score) in relation to the ESG factors listed in Annex II for each family of benchmarks at aggregated level. The ESG factors shall be disclosed at an aggregated weighted average value at the level of the family of benchmarks.			

ESG Ratings Of The Benchmark

ESG RATING	EE-
ENVIRONMENTAL RATING	E+
SOCIAL RATING	EE-
GOVERNANCE RATING	EE-

ESG Rating of top 10 Holdings

ESG RATING	EE-
ENVIRONMENTAL RATING	E+
SOCIAL RATING	EE
GOVERNANCE RATING	EE

Top 10 Positlons

COMPANY	WEIGHT	ESG RATING	COMPANY	WEIGHT	ESG RATING
Southern Copper Corp.	3.30%	E+	Pioneer Natural Resources	2.83%	E+
Antofagasta Hldgs	3.15%	EE	Suncor Energy Inc	2.75%	EE
Teck Resources Limited Class B SV	3.05%	EE-	Marathon Petroleum Corp.	2.71%	E+
Agnico Eagle Mines Limited	2.86%	EE+	Canadian Natural Resources Limited	2.71%	E+
Valero Energy Corp	2.86%	EE-	Steel Dynamics Inc	2.70%	EE-

List of environmental, Social and Governance factors

ENVIRONMENTAL	COVERAGE (%)	SCORE
High Climate Impact Sector Exp. (%)	100.00	100.00
GHG intensity (tonnes CO2e/USD mn)	100.00	363.85
GHG reported vs estimated (%)	100.00	91.8/8.2
Brown Sector Exposure (%)	100.00	78.41
Green Sector Exposure (%)	100.00	11.85
Climate-related physical risk score	100.00	45.68

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List of environmental, Social and Governance factors

SOCIAL	COVERAGE (%)	SCORE
Controversial Weapons Exp. (%)	100.00	0.00
Tobacco Exposure (%)	100.00	0.00
Number Social Violations	100.00	0.00
Adherence to ILO Principles (%)	100.00	95.01
Gender Pay Gap (%)	17.56	17.11
Female to Male Board Members	100.00	0.44
Work Related Accidents (%)	100.00	0.00
Corruption/Bribery (%)	100.00	2.32
Corruption/Bribery (# of convictions)	100.00	0.00
Corruption/Bribery (fines and settlements in EUR millions)	100.00	0.00
GOVERNANCE	COVERAGE (%)	SCORE
Independent Board Members (%)	100.00	77.57
Female Board Members (%)	100.00	28.52

ESG factors calculation and display methodology

ESG FACTOR	CALCULATION FORMULA	DATA SOURCE
ESG RATING	Weighted average ESG rating of the benchmark	ECPI
ENV RATING	Weighted average environmental rating of the benchmark	ECPI
SOC RATING	Weighted average social rating of the benchmark	ECPI
GOV RATING	Weighted average governance rating of the benchmark	ECPI
TOP 10 POSITIONS	Overall ESG rating of top ten benchmark constituents by weighting in the benchmark	ECPI
High Climate Impact Sector Exposure (%)	Benchmark exposure to activities included in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006	TRUCOST
GHG intensity (tonnes CO2e/USD mn)	Greenhouse gas (GHG) intensity of the benchmark	TRUCOST
GHG reported vs estimated (%)	Percentage of GHG emissions reported versus estimated	TRUCOST
Brown Sector Exposure (%)	Benchmark exposure to activities included in Divisions 05 to 09, 19 and 20 of Annex I to Regulation (EC) No 1893/2006	TRUCOST
Green Sector Exposure (%)	Benchmark exposure to activities included in the environmental goods and services sector, as defined in Article 2, point (5) of Regulation (EU) No 691/2011	TRUCOST
Climate-related physical risk score	Exposure of the benchmark portfolio to climate-related physical risks, expressed as a weighted average physical risk score with exposure to a moderate climate change scenario in the year 2030. Scores are represented as values from 1 (lowest risk) to 100 (highest risk)	TRUCOST
Controversial Weapons Exposure (%)	Weighted average percentage of benchmark constituents in the controversial weapons sector	ECPI
Controversial Weapons	Cluster Munitions, Landmines, Nuclear and Depleted Uranium Weapons, Biological/Chemical Weapons	ECPI
Tobacco Exposure (%)	Weighted average percentage of benchmark constituents in the tobacco sector	ECPI
Number of Social Violations	Number of benchmark constituents subject to very severe controversies related to Human Rights and Labour Rights	ECPI
Adherence to ILO Principles	Weighted average percentage of benchmark constituents with no significant labour related controversies	ECPI
Gender Pay Gap (%)	Weighted average gender pay gap	LSEG
Female to Male Board Members	Weighted average ratio of female to male board members	LSEG
Work Related Accidents (%)	Weighted average percentage of benchmark constituents with significant health & safety related controversies	ECPI
Corruption/Bribery (# of convictions)	Numbers of convictions for violations of anti-corruption and anti-bribery laws.	ECPI
Corruption/Bribery (fines and settlements in EUR millions)	Amount of fines for violations of anti-corruption and anti-bribery laws.	ECPI
Independent Board Members (%)	Weighted average percentage of board members who are independent	LSEG
Female Board Members (%)	Weighted average percentage of female board members	LSEG

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Item 7. Where the response to Item 5 is positive, provide below the details (score) for each benchmark, in relation to the ESG factors listed in Annex II, depending on the relevant underlying asset concerned.

please refer to item 6

Item 8. Data and standards used.

Description of data sources used to provide information on the ESG factors in the benchmark statement.	<p>ESG metrics are calculated based on ECPI research methodology, and third-party data, including Trucost data, LSEG and publicly available data sources.</p> <p>ESG metrics rely on reported data when available and feasible for ESG dimension measured, otherwise they are based on estimated data or qualitative assessment.</p> <p>Additional details on the ESG disclosure are available in the Benchmark Family Rule Book:</p> <ul style="list-style-type: none">• Confluence ECPI ESG Rating Methodology: Companies• Trucost Environmental Data Methodology: Methodology Guide• LSEG ESG Scores Methodology: ESG Scores Methodology
Reference standards	<ul style="list-style-type: none">• UN Global Compact• OECD Guidelines• UN Guiding Principles• UN Sustainable Development Goals• Human rights (UN human rights treaties)• Labour rights (ILO Conventions)• Environmental standards (e.g. Rio Declaration on Environment and Development; Convention on Biological Diversity; Framework Convention on Climate Change; Paris Agreement)• Anti-corruption standards (UN Convention against Corruption)

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Section 2 - Additional Disclosure Requirements For EU Climate Transition And EU Paris-Aligned Benchmarks

Item 9. Where a benchmark is labelled as "EU Climate Transition Benchmark" or "EU Paris-aligned Benchmark", benchmark administrators shall also disclose the following information:	
forward-looking year-on-year decarbonisation trajectory;	N/A
degree to which the IPCC decarbonisation trajectory (1,5 °C with no or limited overshoot) has been achieved on average per year since creation;	N/A
overlap between those benchmarks and their investable universe, as defined in Article 1, point (e), of Commission Delegated Regulation (EU) 2020/1818, using the active share at asset level.	N/A

Section 3 - Disclosure Of The Alignment With The Objectives Of The Paris Agreement

Item 10. By the date of application of this Regulation, for significant equity and bond benchmarks, EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks, benchmark administrators shall also disclose the following information. By 31 December 2021, benchmark administrators shall, for each benchmark or, where applicable, each family of benchmarks, disclose the following information:	
Does the benchmark align with the target of reducing carbon emissions or the attainment of the objectives of the Paris Agreement;	NO
the temperature scenario, in accordance with international standards, used for the alignment with the target of reducing GHG emissions or attaining of the objectives of the Paris Agreement;	N/A
the name of the provider of the temperature scenario used for the alignment with the target of reducing GHG emissions or the attainment of the objectives of the Paris Agreement;	N/A
the methodology used for the measurement of the alignment with the temperature scenario;	N/A
the hyperlink to the website of the temperature scenario used.	N/A
the hyperlink to the website of the temperature scenario used.	N/A

Date on which information has last been updated and reason for the update:	
September 2019	Initial version
February 2020	Removal of Freedom Indices
May 2023	Updated Format
April 2024	Enriched datapoint disclosure
30 April 2024	Monthly ESG Disclosure

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Annex 1 - Definition of Key Terms used in the benchmark statement

Administrator	A natural or legal person that has control over the provision of a benchmark, for the ECPI Index this is StatPro.
Benchmark	Any index by reference to which the amount payable under a financial instrument or a financial contract, or the value of a financial instrument, is determined, or an index that is used to measure the performance of an investment fund with the purpose of tracking the return of such index or of defining the asset allocation of a portfolio or of computing the performance fees.
BMR	Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014. The Benchmark Regulations - the Commission Delegated Regulation (EU) 2018/1643, and the supplementary regulatory technical standards.
Discretion/exercise judgement	The exercise of discretion by an administrator with respect to the use of data in determining a benchmark, including 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, and manually altering constituent weightings.
Family of Benchmarks	A group of benchmarks provided by the same administrator and determined from input data of the same nature which provides specific measures of the same or similar market or economic reality.
Financial Contract	(a) any credit agreement as defined in point (c) of Article 3 of Directive 2008/48/EC; (b) any credit agreement as defined in point (3) of Article 4 of Directive 2014/17/EU
Financial Instrument	Means any of the instruments listed in Section C of Annex I to Directive 2014/65/EU for which a request for admission to trading on a trading venue, as defined in point (24) of Article 4(1) of Directive 2014/65/EU, has been made or which is traded on a trading venue as defined in point (24) of Article 4(1) of Directive 2014/65/EU or via a systematic internaliser as defined in point (20) of Article 4(1) of that Directive.
Input Data	The data in respect of the value of one or more underlying assets, or prices, including estimated prices, quotes, committed quotes or other values, used by StatPro as an administrator to determine a benchmark.
Investment Fund	It is an AIF as defined in point (a) of Article 4(1) of Directive 2011/61/EU, or a UCITS as defined in Article 1(2) of Directive 2009/65/EC.
ISIN	The International Securities Identification Number (ISIN) is a code that uniquely identifies a specific securities issue.
Non-Significant Benchmark	It is a benchmark which is not considered a 'critical benchmark' or 'significant benchmark' according to point 27 of Article 3(1) of Regulation (EU) 2016/1011.
Stakeholder	A natural or legal person that uses a benchmark for: (a) issuance of a financial instrument which references an index or a combination of indices; (b) determination of the amount payable under a financial instrument or a financial contract by referencing an index or a combination of indices; (c) being a party to a financial contract which references an index or a combination of indices; (d) providing a borrowing rate as defined in point (j) of Article 3 of Directive 2008/48/EC calculated as a spread or mark-up over an index or a combination of indices and that is solely used as a reference in a financial contract to which the creditor is a party; (e) measuring the performance of an investment fund through an index or a combination of indices for the purpose of tracking the return of such index or combination of indices, of defining the asset allocation of a portfolio, or of computing the performance fees.
StatPro	The benchmark administrator of the ECPI Index family of indices.
The Index Governance Committee	The group of individuals appointed at the administrator to provide supervision of the ECPI indices.
Transaction Data	Means observable prices, rates, indices or values representing transactions between unaffiliated counter parties in an active market subject to competitive supply and demand forces.

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