

OPIS

A DOW JONES COMPANY

North America Aromatics Daily Pricing and Methodology

Methodology and specifications
Effective April 2023

OPIS

A DOW JONES COMPANY

Contents

Introduction	3	Verification of transaction data	8
Chemical Markets Overview	3	Scrutiny of transactions	8
Product Methodology Table	4	Anomalous or suspicious market data	8
Daily Price Discovery Process	5	Additional checks and analysis	9
Daily Price Assessment Laycans	5	Compliance and ethics	9
Price Assessment Criteria	5	Price Assessment Disputes	9
Daily Rolling Monthly Spot Averages	6	Complaints Policy	9
Forward Curves	7	Price Assessment Corrections	10
Illiquid Markets	7	Methodology Review	11
Judgment guidelines	7	Cessations of a benchmark	12
Market data application	7	Contacts	13

Introduction

OPIS has been a news and price reporting leader in the downstream refined products marketplace since 1977. We have served customers throughout the many industry segments – traders, suppliers, commercial end-users, wholesalers and retailers – with up-to-the minute, news, analysis and pricing that appears in our many published reports and on-line services.

OPIS benchmarks are underpinned by robust methodologies developed in consultation with market stakeholders and are in-line with market realities. Regular reviews by customers and editors ensure the benchmarks are fit for purpose and that there is an open communication channel with stakeholders. This enables the benchmarks to evolve with changing needs and market landscape.

Market data, including trade data, is collected by editors through various channels including telephone calls, e-mails, instant messaging, electronic platforms, and electronic transfer of back-office deal sheets.

Editors undergo rigorous internal market training and supervision before assessing markets as do “backup” editors who may be called on to fill in for a particular market’s primary editor. Editors’ market calls are internally reviewed daily prior to publication by a supervisory editor who checks their accuracy and adherence to OPIS methodology.

OPIS editors always search for the most complete picture of market activity in their assessments. We believe transaction data should form the bedrock of any price assessment. However, with some products and in some markets the amount of transactional data is much less comprehensive. In such case, OPIS price reporters can use bid/ask ranges to set highs and lows in accordance with established methodologies. Highest bid and lowest

offer may set the parameters of these ranges. Additionally, OPIS price reporters can consider spot deals that utilize formula pricing, relationships to other price benchmarks, regional arbitrages and/or other factors that may influence a seller or buyer.

Chemical Markets Overview

This statement of methodology reflects the fundamental principles that form the foundation of the OPIS **Daily North America Aromatics Report**. It includes detailed information on process, data collection, and the terms and conditions of price acceptance and product specifications.

The overarching goal of the OPIS daily price assessment is to provide market participants with a trusted and independent benchmark. OPIS has no stake in any commodity transactions, is not funded by oil and chemical industry initiatives, and strictly adheres to antitrust guidelines determined by independent legal counsel.

The methodology is continually evolving to reflect changing market realities and OPIS takes full responsibility for keeping this statement current.

The OPIS North America Aromatics Daily service lists North American daily spot market prices for the following aromatics markets:

- **Benzene FOB/DDP Houston (ASTM D-2359)**
- **Mixed Xylenes FOB/DDP Texas Gulf Coast (Solvent Grade)**
- **Mixed Xylenes FOB/DDP Texas Gulf Coast (Commercial Grade)**
- **Toluene FOB/DDP Houston (Nitration Grade ASTM D-841)**
- **Toluene FOB/DDP Houston Commercial Grade (Does not meet ASTM D-841, but is suitable for gasoline blending)**

All price assessments are subject to compliance with standard trading conditions with regard to **quality, parcel size, loading/delivery ports, laycans, and credit terms** as determined by

standard market conventions. For OPIS standard trading conditions and criteria please refer to the Methodology Product table.

Product Methodology Table

Product	Daily	Weekly	Monthly	Currency	Type	Basis	Location	Delivery Period	Minimum Load Size	Unit	Quality	Calculation / Assessment
Benzene M1/Current	x	x	x	USD	Spot	FOB/DDP	Houston	Current month	10,000	BBL	ASTM D-2359/90	Daily methodology doc
Benzene M2/Next	x	x		USD	Spot	FOB/DDP	Houston	Next month	10,000	BBL	ASTM D- 2359/90	Daily methodology doc
Benzene M3/Third	x			USD	Spot	FOB/DDP	Houston	Third month	10,000	BBL	ASTM D- 2359/90	Daily methodology doc
Benzene Daily Rolling Spot Avg	x		x	USD	Spot	FOB/DDP	Houston	Current month	10,000	BBL	ASTM D- 2359/90	Daily methodology doc (25th previous month to 24th current month)
Nitration-Grade Toluene M1/Current	x	x	x	USD	Spot	FOB/DDP	Houston	Current month	10,000	BBL	ASTM D-841	Daily methodology doc
Nitration-Grade Toluene M2/Next	x	x		USD	Spot	FOB/DDP	Houston	Next month	10,000	BBL	ASTM D-841	Daily methodology doc
Nitration-Grade Toluene M3/Third	x			USD	Spot	FOB/DDP	Houston	Third month	10,000	BBL	ASTM D-841	Daily methodology doc
Nitration-Grade Toluene Daily Rolling Spot Avg	x	x	x	USD	Spot	FOB/DDP	Houston	Current month	10,000	BBL	ASTM D-841	Daily methodology doc (25th previous month to 24th current month)
Commercial-Grade Toluene M1/Current	x	x	x	USD	Spot	FOB/DDP	Houston	Current month	10,000	BBL	Does not meet ASTM D-841 but suitable for gasoline blending	Daily methodology doc
Commercial-Grade Toluene Daily rolling Spot Avg	x		x	USD	Spot	FOB/DDP	Houston		10,000	BBL	Does not meet ASTM D-841 but suitable for gasoline blending	Daily methodology doc (25th previous month to 24th current month)
Mixed Xylenes M1/Current	x	x	x	USD	Spot	FOB/DDP	TXGC	Current month	10,000	BBL	ASTM D-5211	Daily methodology doc
Mixed Xylenes M2/Next	x	x		USD	Spot	FOB/DDP	TXGC	Next month	10,000	BBL	ASTM D-5211	Daily methodology doc
Mixed Xylenes M3/Third	x			USD	Spot	FOB/DDP	TXGC	Third month	10,000	BBL	ASTM D-5211	Daily methodology doc
Mixed Xylenes Daily Rolling Spot Avg	x		x	USD	Spot	FOB/DDP	TXGC		10,000	BBL	ASTM D-5211	Daily methodology doc (25th previous month to 24th current month)
Mixed Xylenes (Solvent Grade) M1/Current	x	x	x	USD	Spot	FOB/DDP TXGC		Current month	10,000	BBL	ASTM D-5211, 1% NA	Daily methodology doc
Mixed Xylenes (Solvent Grade) M2/Next	x	x	x	USD	Spot	FOB/DDP TXGC		Next month	10,000	BBL	ASTM D-5211, 1% NA	Daily methodology doc
Mixed Xylenes (Solvent Grade) Daily Rolling Spot Avg	x		x	USD	Spot	FOB/DDP TXGC		Current month	10,000	BBL	ASTM D-5211, 1% NA	Daily methodology doc
Mixed Xylenes (Commercial Grade) M1/Current	x	x	x	USD	Spot	FOB/DDP TXGC		Current month	10,000	BBL	Does not meet ASTM D-5211, 1% NA	Daily methodology doc
Mixed Xylenes (Commercial Grade) Daily Rolling Spot Avg	x		x	USD	Spot	FOB/DDP TXGC		Current month	10,000	BBL	Does not meet ASTM D-5211, 1% NA	Daily methodology doc

Daily Price Discovery Process

The North American price assessment methodology seeks to capture full-day transactions, bids, and offers for spot market benzene, toluene, and mixed xylenes. OPIS chemical market analysts will proactively poll market participants via electronic instant messaging (such as ICE Chat, Eikon, Yahoo), email, telephone, or face-to-face conversation for price data throughout the standard trading day.

Analysts will always attempt to collect data from a broad cross section of the North American aromatics sector, including producers, consumers, traders, and brokers, so that OPIS is not reliant on one source for data. In order to meet publication deadline, OPIS will not include transactions received after 5:30 pm Central Standard Time for consideration in the day's final price assessment process or the revision process.

Market participants are encouraged to report transactions, real-time bids and offers, and live market bid/offer ranges directly to OPIS. The expressions of bids and offers are regarded as open and executable to the market at large. OPIS will attempt to gather as much price information from the marketplace as possible and from as many sources as it can, so that data is not being provided from any one source. OPIS reserves the right to republish via instant messaging platforms the market information collected, and closely track the evolution of indicative values throughout the business day. All data collected is time-stamped and archived for review.

Daily Price Assessment Laycans

OPIS tracks market activity throughout the North American business day to derive an assessment of spot market price levels for specified delivery/loading laycans. Based on 'normal' regional market activity, the following laycans will be assessed:

- Benzene: Month 1 (M1), Month 2 (M2), and Month 3 (M3).
- Mixed Xylenes: Month 1 (M1), Month 2 (M2), and Month 3 (M3).
- Mixed Xylenes (Solvent Grade): Month 1 (M1), Month 2 (M2)
- Mixed Xylenes (Commercial Grade): Month 1 (M1)
- Toluene (Nitration Grade): Month 1 (M1) and Month 2 (M2).
- Toluene (Commercial Grade): Month 1 (M1)
- On any given day Month 1 refers to the current month, Month 2 to the current month +1, and Month 3 to the current month +2.

Price Assessment Criteria

OPIS prices are assessed based on the range of confirmed physical deals transacted and reported during the North American working day for the relevant month of assessment. Where only one deal has been confirmed, then that will form the price assessment for the day. Where there is a range of deals for the same month, the lowest and highest traded values will form the range.

Highest priority will be given to transactions that are transparent and open to any reputable counterparty with proper financial and logistical resources. For a deal to be used in the price assessment, it must be confirmed by a source that has been vetted and deemed an approved market source for the product in question by OPIS. A good faith attempt will always be made to "confirm" both sides of any transaction (meaning that the buyer and seller in the transaction have been identified and corroborate the price and terms of the sale). Deals of all types that are confirmed to OPIS with the stipulation that they are not for wider publication will not be used within the price assessment.

All transactions are to be "physical" product; the sale of "paper" product (meaning a financial arrangement where no physical volume is

expected or required to be exchanged) will not be included in the price range.

Any transaction that has logistical restrictions, quality or specification issues, different currency, load size, or shipping terms to those specified in the methodology product table or any other special considerations may be used with an adjustment to determine the posted range at the discretion of the analyst.

All buy/sell transactions, time or location swaps, or any transactions having options that could meaningfully impact the commercial value will be ignored if discovered, regardless of the price assigned.

If a transaction appears to be "out of market" (meaning significantly different in price than would be expected based on other recently confirmed price points), OPIS may elect to ignore the transaction. OPIS will also review prior expressions of buying and selling interests to examine the circumstances leading to the trade in order to determine the integrity of the transaction.

Transactions must be conducted at arm's length whereby the buyer and seller are not related in any way by means of share ownership or affiliation in each other's company.

All bona fide transactions can be considered for index compilation, regardless of whether it is concluded by a natural buyer (end user), seller (producer), or trader. If a transaction is identified by OPIS or market participants as anomalous or suspicious, it will be excluded from the assessment process until the situation can be clarified. This can include repetitive transactions between two parties within a single trading session, whereby the parties alternately buy and sell from each other. If it is verified that the transaction is above board by the next business day, OPIS will retroactively revise its marker assessment to include the deal.

On days when there have been no confirmed transactions a "notional" price will be posted. A notional price reflects the consultant's best estimate of price or price range where a transaction could have occurred between an interested buyer and an interested seller. The consultant will take into account market direction, momentum, demand, and supply, as well as the most recent transaction price information and the prevailing range of bids and offers, if any. Highest priority will be given to bids and offers that are transparent and open to any reputable counterparty with proper financial and logistical resources.

Both repetitive and incremental bids and offers that conform to standard market conventions, as well as retracted bids and offers, are included for consideration in the OPIS price assessment process.

Notional postings are indicated by the letter "n" located in the right-hand column of the price range in question.

Daily Rolling Monthly Spot Averages

The daily rolling monthly spot price average indexes are shown for current-month benzene, toluene, and mixed xylenes and are calculated as straight arithmetical averages of both the daily high and low postings during the period between the 25th of the prior month (or the next trading day after if the 25th is not a trading day) and the 24th of the current month (or the prior trading day if the 24th is not a trading day). The current month indexes are recalculated each day during the posting period and then locked down as the current month ends after the close of business on the 24th. The cycle then continues for the new current month. An 11-month history is also shown.

Daily spot price assessments also form the basis for prices reported in the Chemical Market Analytics (CMA) Weekly Global Aromatics report. Due to the nature of the Weekly report, current month spot

prices will continue to be posted in the Daily report until the last Thursday of any given month, even if the daily spot average for the current month has ceased calculating, therefore any current month prices posted after the 24th will only contribute towards the weekly average calculation and not the daily rolling monthly spot price average calculation.

Forward Curves

The forward curves for benzene, toluene and mixed xylenes are calculated for the current month and the following 18 months, the next three quarters and the calendar year. The curve is calculated using daily spot price data in addition to the daily delta for WTI crude oil and RBOB gasoline futures where applicable.

Illiquid Markets

OPIS recognizes that petrochemical markets can suffer from periods of illiquidity. In the absence of firm bids, offers and transactions, OPIS will still poll market participants for expressions of interest to trade. Due to tight correlation between certain markets, OPIS also tracks spread values in upstream feedstock, downstream products, co-products and alternative products.

Other factors that can influence prices, such as supply/demand data, macroeconomic issues and geopolitics will also be filtered for market clarity. Accordingly, in certain assessments where insufficient market data exists, OPIS chemical analysts will exercise best judgment to quantify these relative values in the process of compiling the price index.

In the event that certain markets are shut because of public holidays, OPIS analysts may elect to retain the price assessment values published on the previous trading day.

Judgment guidelines

As part of the price reporting process, market reporters are required to use their professional judgment, to ensure the reliability of the data and price assessment compilation process. OPIS has set forth guidelines throughout this Methodology to ensure that the use of judgment is consistent and fair. These guidelines can be found in the following sections of this Methodology:

- Anomalous or suspicious transactions
- Additional checks and analysis
- Comparative markets
- Transactions and survey weightings

OPIS has developed Editorial Standards that details the process for compiling each specific price assessment. In addition, OPIS has developed a program of training and oversight of market reporters that helps ensure uniformity in the application of judgment. The key elements of this program include:

1. An initial course of training that explains and defines the parameters for the exercise of judgment
2. Suitably sourced staffing to ensure proper backup for sick days, vacations, etc.
3. Oversight of reporting teams by experienced market editors that are involved in daily mentoring and assisting in the application of judgment
4. A requirement that market editors sign-off on all price assessments

Market data application

The specifications defined in the methodology and data used to compile each price assessment is deemed to be the most representative for that market. OPIS will utilize various types of market data in compiling its price assessments, including:

- Transactions
- Bids and offers
- Other market information

Transaction information is the preferred source of data for the price assessments. However, depending on the liquidity of the markets being assessed, other information can be and is used, such as bids and offers and other market information. This can be in combination with transactions, or can substitute transactions, depending on the market liquidity and specific market circumstances.

Consequently, in most markets there will be a relatively higher rank given to transactions over bids and offers and other market information in the compilation process.

Verification of transaction data

Market reporters carefully evaluate all data gathered before it is used in the price compilation process. These data inputs include transactions, bids, offers, volumes, counterparties, specifications and any other information that contributes materially to the determination of a price assessment. Specific to transactions and bids and offers, market reporters seek to verify and validate the price, volume, specifications, and location basis, and with regard just to transactions, the counterparties. Market reporters examine all the reported transactions to avoid duplication.

In order to promote transparency in the markets, OPIS seeks to inform the market of any deals it identifies and significant movements of bids and offers through the relevant OPIS publications.

Scrutiny of transactions

OPIS has created guidelines that control the exercise of judgment by its market reporters. Market reporters are trained to identify anomalous

or suspicious transactional data that merit further investigation to verify if they are bona fide data for inclusion in the index compilation process. If a transaction has been identified by a market reporter as anomalous or suspicious, it will be escalated to the markets editor. Further checks and analysis will be conducted by the markets editor when an anomalous or suspicious transaction is identified for further examination.

Anomalous or suspicious market data

The following types of market data have been identified by OPIS as potentially anomalous or suspicious:

- Transactions not transacted at arm's length, including deals between related parties or affiliates
- Transaction prices that fall outside of the generally observed bids and offers that operated throughout the trading period
- In the absence of observed bids and offers, transaction prices that deviate significantly from transactions seen for that trading period
- Assessments of fair value that fall outside the reasonable parameters set by transactional information
- Transactions that are suspected to be a leg of another transaction or in some way contingent on an unknown transaction (excluding EFP¹ and sleeve trades²).
- Transactions, bids and offers that deviate from the typical transaction volumes seen in that market.
- Any other transaction details that appear to stray from the usual trading behaviour seen in that market, including, but not limited to:
- Repeated trading activity in periods or pools of potentially low liquidity, such as the margins of

¹ . An EFP deal is initially executed at a fixed price and is then broken down into two parts: one part being a physical deal done on an index basis, while a paper position of equivalent size is taken in the same direction as the physical deal. This is done in a way that adds up to the same as the strike price and all elements of the EFP deal are executed at the same time.

² . Sleeve deals are deals executed using a third-party credit sleeve because the buyer and seller are unable to transact directly because of credit issues. The third-party credit sleeve is not exploiting an arbitrage opportunity.

the defined trading window (such as very early or very late deals),

- Counterparties not typically seen, – divergent specifications and – unusual delivery locations.
- Or specific delivery location in a port range that may have time specific issues affecting price.
- This will include transactions that are identified by other market participants as being, for any reason, potentially anomalous
- Discrepancy in transaction details reported by counterparties

Additional checks and analysis

The markets editor and market reporter(s) will undertake the following transactional and source analysis when a potentially anomalous or suspicious transaction is identified for further examination.

They will assess the following transaction-based factors:

- The nature of the linkage of the perceived anomalous or suspicious transaction to other possible transactions
- The differences between counterparties on transactional details
- The impact of other factors on price and/or volume, including scheduling and logistic issues, demurrage issues and credit issues

The markets editor will also assess the following source-based factors:

- Whether the explanation provided by the source for the outlying nature of the transaction is plausible
- The credibility of the sources³
- Whether the timing of the provision of information impacts the verification and validation process.

Should this process determine that a transaction be excluded from the price assessment process, the markets editor will approve the exclusion and document the rationale. For price assessments used to settle derivatives, OPIS has established internal procedures that involve escalating review within OPIS management and, if necessary, notification and escalation of inquiry within the source's company.

Compliance and ethics

OPIS has implemented extensive compliance policies and procedures in accordance with the best practices of the price reporting industry. These include a comprehensive ethics policy that applies to all the Editorial Price Reporting staff. The Editorial Standards is an expression of OPIS' intent to set out ideals for the ethical conduct of OPIS Price Reporting personnel in the performance of their product price assessment activities. This Editorial Standards Code of Conduct is supported by the Conflicts of Interest Statement.

Price Assessment Disputes

Every spot price editor at OPIS understands that his or her top priority is calling market assessments fairly. Our methodologies are crafted after careful consultation with our customers and applied by our editors to ensure maximum transparency and accuracy.

Still, we understand there may be times when spot price customers wish to question, dispute or comment on a price assessment and/or our methodologies.

Complaints Policy

OPIS has a complaints policy in line with the IOSCO Oil PRA Principles. This policy describes the procedures and mechanisms for receiving,

³ . Sources will be deemed more credible if they (i) adhere to the reporting standards outlined in this Methodology; (ii) quickly respond to queries from market reporters; and (iii) have staff designated to respond to such queries.

investigating and retaining records concerning complaints about its price assessments.

In order for a complaint to enter the formal complaints handling process, the complainant must record the complaint in writing, explaining as fully as possible the background to the complaint, and attaching all relevant materials or evidence where appropriate.

The complaint should be sent to:

Email: OPIS_Compliance_Team@opisnet.com

Complaints may be submitted in relation to any aspect of benchmark calculation and management process by employees including:

- Whether a specific benchmark determination is representative of market value;
- On a proposed change to a benchmark determination process;
- On an application of the methodology in relation to a specific benchmark determination; and
- On other decisions in relation to the benchmark determination process.

If an employee of OPIS receives an enquiry from a stakeholder which is not formally stated to be a complaint but could be regarded as such, the employee should make the stakeholder aware of this Complaints Policy.

Upon receipt of a complaint, the Compliance Team will undertake the following steps:

- Acknowledge receipt of the complaint in writing in 5 business days;
- Document the receipt of the complaint in the Complaint Register;
- Investigate the complaint in a timely and fair manner. The investigation will be conducted independently of any personnel

who may be or may have been involved in the subject matter of the investigation;

- Determine whether further escalation is required;
- The complainant will be advised of the final outcome of the investigation within 60 calendar days, unless such communication would be contrary to the objectives of public policy. If circumstances warrant a longer time period, the complainant will be informed.

If a complainant is dissatisfied with the way a complaint has been handled or the decision in the situation, the complainant may, within six months, request that the complaint is referred to an independent third party.

All documents relating to a complaint, including those submitted by the complainant, will be retained for at least five years.

On an at least annual basis, the Compliance Team will review all complaints submitted under this policy to determine the existence of any trends. This Complaints Handling Policy shall be reviewed by the Compliance Team at least annually.

Price Assessment Corrections

If warranted by the circumstances, OPIS may publish corrections to price assessments after the publication date. OPIS will typically correct material errors that arise from the improper entry of information, the erroneous calculation of market data, misreported information or the incorrect application of the stated methodology. However, OPIS will not retroactively assess markets based solely on new information learned after the publication date of the relevant price assessment. Corrections to price assessments will be conducted in accordance with the Price Assessments Correction policy.

Corrections or changes to prices may also be initiated if the price range was reported incorrectly due to clerical error or if the price and/or terms were misrepresented or misunderstood. In some circumstances the daily report will be re-issued.

Upon discovery of the need for a correction whether realized internally or from an outside party alerting an OPIS market editor, a correction is drafted by the market editor who assessed the market in question. That corrections draft is reviewed by a direct supervisor who reviews it for accuracy and then issues the correction through the same communication medium used to assess the market. Only market editors who are directly involved in the market assessment in question may draft a correction and only a supervisor of that market editor can authorize the issuance of a correction.

Methodology Review

OPIS price assessment methodology is constantly scrutinized internally for clarity, relevance and comprehensiveness by market analysts and senior analysts across the OPIS group. Methodology changes involve a robust polling of the marketplace to ensure all points of view are considered prior to any changes being considered or made.

Stakeholders are encouraged to contribute comments on our methodology year-round to EnergySpotComplianceGroup@opisnet.com to help ensure our spot market assessments remain relevant, accurate and comprehensive. Editorial staff will review and respond to all comments. Should comments result in a proposal to amend methodology, a subscriber notice soliciting more specific feedback will be issued.

Stakeholders also contribute to the review of methodologies via responses to our annual request for feedback. This request will be sent via email and noted in the bodies of our reports.

Once OPIS has been made aware of a potential need for a review of the benchmark methodology, it will perform analysis to determine whether such methodology change would be beneficial for the quality and representativeness of the benchmark, and whether it would constitute a material change.

A methodology change is likely to be material if it impacts the index calculation process or formula, the quality of the input data, the index selection rules, the underlying market or reality measured, the panel of Contributors to the benchmark, or the benchmark level. Where a methodology change is beneficial and material, and where it is judged to be appropriate and proportionate, the OPIS Editorial team will start a wider consultation which is addressed to all relevant stakeholders.

If either an internal or external review of a methodology results in a potential material change to the methodology or cessation of a benchmark, OPIS will begin formal procedures for external consultation. Materiality is subject to professional judgment and takes into account the impact of the proposed change on the decision making of stakeholders.

As part of a wider consultation on a methodology change to a benchmark, OPIS Editorial will:

- Take reasonable steps to make registered users and other stakeholders aware of the proposed changes, the rationale for the methodology change, and proposed timing;
- Provide a clear timeframe during which stakeholders may provide feedback to the suggested methodology change. Consultations about methodology changes will generally be open for 4 weeks, except in exceptional circumstances where the OPIS decides that a shorter or longer consultation period is warranted;
- Within a reasonable time period after the consultation period has closed, OPIS may

choose to make available a summary of the comments received along with the Editorial team's responses, except where a commenter has requested confidentiality;

- Following the conclusion of the consultation process, make a decision on the methodology change and report it to the appropriate editorial senior management, and Compliance team; and
- Publish a notification of the upcoming methodology change in the relevant report and registered users/customers will be notified via email, along with adequate notice of the date on which the methodology change will take place.

When setting such date, the OPIS Editorial team will consider the type of benchmark and the extent of its use.

Once a spot methodology change or addition is contemplated, OPIS reaches out to customers in the form of a subscriber notice delivered via email soliciting feedback on the change. Feedback will be given via email or telephone and the opportunity to comment on any contemplated spot methodology change is open for up to four weeks from the notice period.

Cessations of a benchmark

Situations might arise where the OPIS Editorial Management might consider discontinuing the provision of a Benchmark, for example given a lack of demand for the benchmark, a deterioration in data sufficiency, or changes in market structure. The Editorial team will undertake any benchmark cessation in an orderly manner, taking into consideration the potential impact to users of the benchmark and market integrity. When considering whether to discontinue or terminate a benchmark the OPIS Editorial team will follow the following procedure:

- Confirm whether there are any financial instruments which reference the relevant benchmark. Other than where there are no outstanding products linked to a benchmark, the cessation of a benchmark will require escalation to and approval by the relevant editorial and product management teams, and the appropriate notification Compliance should the benchmark be used for clearing of financial instruments.
- Conduct a stakeholder consultation process on the proposed cessation similar to the process used for methodology changes.
- As part of any consultation process, take reasonable steps to make registered users/customers and other relevant stakeholders aware of the rationale for the termination, the content and proposed timing of the termination.
- Provide a clear timeframe during which stakeholders may provide feedback to the cessation proposal. Consultations about cessations will generally be open for up to 4 weeks, except in exceptional circumstances where the Editorial team decides that a shorter or longer consultation period might be warranted.
- Within a reasonable period of time after the consultation period has closed, the Editorial team will make available a summary of the comments received during any consultation process along with the OPIS Editorial team's responses, except where a commenter has requested confidentiality.
- If the termination of a benchmark or family of benchmarks has been approved, a notification of the decision will be published on the relevant webpages and registered users/customers are notified, along with adequate notice of the date on which termination will take place. When

deciding on the length of such period the Editorial management team will take into account the type of benchmark and the extent of its use.

In order to ensure that they are representative of the market being assessed, OPIS conducts reviews of its methodologies on both an internal and external basis. OPIS conducts a formal review of all of its methodologies and attendant documents on at least an annual basis. Externally, OPIS is in regular contact with market participants as such market participants are not only well-situated to know the particulars of the market but have a vested interest in the implementation of accurate and relevant methodologies. When conducting its reviews, OPIS will consider a myriad of factors, including, but not limited to, activity in the market, visibility of market data and current and anticipated industry usage of the price assessment.

If the review process recommends a material change to the methodology, or termination of an existing benchmark, the markets editor will submit a proposal to OPIS Editorial management for review.

Contacts

For Formal Complaints

Lejla Hadzic

Carly John

OPIS_Compliance_Team@opisnet.com

OPIS Customer Care

energy@opisnet.com

International: +1 301 284 2000

North America: +1 888 301 2645

(Toll- free within the U.S)