Internal methodology in the price determination policy of the benchmarks published by FinanceAgri

SISALMONI INDICES --- Benchmarks in the Salmon market

Version 1.0 written on 17-06-2024

Date	Ver	Section	Change
24/09/2024	V1.1	2.2.1	If one of the categories (excluding the 3-6kg index) is not supplied, FinanceAgri will take the value closest to the category concerned.
01/10/2024	V1.2	2.2.1	To be validated, a contribution for one category must include at least 2 contributors. If this condition is not fulfilled, the contribution should be refused by FinanceAgri. If one of the categories (excluding the 3-6kg index) is not supplied (no contributions or less than 2 contributors), FinanceAgri will take the value closest to the category concerned.
01/09/2025	V1.3	2.2.1	When the contributed volume of a category does not exceed 500 kg, FinanceAgri will rely on the value of the category deemed closest, in order to ensure data representativeness.
08/01/2026	1.4	2.1 1.2.5 2.1	Removal of the “non-significant” mention Addition of our hosting provider’s name (data third-party) Contributor specification’s details
17/11/2026	V1.5	1.2.3	Number of contributors increased from 11 to 17

SUMMARY

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Introduction

FinanceAgri is an independent index administrator that produces physical price benchmarks in commodity markets.

FinanceAgri's methodology has been defined with the objective of providing transparent and reliable price valuations, representative of the market value at a given point in time.

This document describes in particular the processes put in place and the principles to which AgriFinance adheres to collect data and define a price representative of the market, at a given time, on the products evaluated.
This methodology is accessible to all via the FinanceAgri website: https://www.sitagri.com/sitagri-salmon-index

Any changes to the methodology, in order to improve the transparency of valuations and to reflect market developments, will be mentioned; The history of the changes will also be available.

The days or benchmarks that will not be published are defined according to a calendar that is available on the FinanceAgri website at the following address: https://www.sitagri.com/sitagri-salmon-index

The publication dates and evaluation periods are subject to change in the event of force majeure that does not allow FinanceAgri to comply with this schedule (network outages, power outages, acts of terrorism or any other situation resulting in an interruption of FinanceAgri's services). Any changes to the schedule will be communicated publicly, where possible.

All assessments are carried out by competent and trained people in accordance with our methodology.

FinanceAgri's methodology is divided into 4 main parts:

Part 1: The data retrieval process as well as the data normalisation procedures.

Part 2: The methodology of processing raw data to convert it into a price evaluation.

Part 3: The internal control system, monitoring and accountability framework - the internal organization of FinanceAgri to ensure perfect data integrity.

Part 4: The means available to users to contact FinanceAgri in order to clarify certain published data or to dispute it.

1. Data Recovery Process

1.1 Normalisation

It is fundamental for FinanceAgri to ensure that the raw data used for the final assessment of the market price of a product is of the highest possible quality so that this market price cannot be disputed.

It is therefore essential to always evaluate a specific product with identical characteristics.

1.1.1 Representative volume

If the total input data reported for all SISALMONI indices is less than 10% of the latest official export volume of fresh Atlantic salmon published by Statistics Norway (Nor. Statistisk Sentralbyrå) over a consecutive period of 4 weeks FinanceAgri will inform the public and the contributors and take measures to attract new contributors and increase reported volumes.

1.1.2 Declared input data

If there is no input data declared in a weighting category, FinanceAgri will ask contributors for a weekly indicative price quotation independent of each other and will use the average price of these quotations thus obtained. When quoting, Contributors should consider their market valuation, purchasing interests, and any relevant sales negotiations that may help them estimate the price they would have earned if they had made sales in the Index Product for the specific weight class.

Each indicative price offer must be made in writing, submitted by e-mail, by secure messaging, by the secure contribution system developed by FinanceAgri,...

1.1.3 Determination of the value of index prices in periods of force majeure

In the event of force majeure and/or non-existent input data, FinanceAgri will replace the input data with the public statistics on fresh Atlantic salmon exports published by Statistics Norway (Nor. Statistisk Sentralbyrå) are divided into weighting classes based on the relative index values based on the input data reported to FinanceAgri in the previous week, and base the index value on these statistics until the input data can be used again. In the very unlikely event that these statistics are also insufficient or non-existent, FinandceAgri will use the index value of the previous week as the index value.

1.1.4 Guidelines for the exercise of discretion

FinanceAgri uses index managers (the expert) to apply the methodology with regard to the input data and the calculation of the index value and volumes. Index managers (the expert) perform quality checks of the input data on a weekly basis, using, for example, computer tools

to access multiple control reports, price alarms after comparing the input data with the total average, price profiles and volume analysis.

The index managers (the expert) will immediately contact the Contributors if alarms are triggered and will ask for additional information and explanations. In such cases, the Contributor will correct and resubmit the Input Data or explain and confirm the accuracy of the Input Data.

When in doubt, the index manager may decide not to keep the price if, after checking, in particular the news and the evolution of the derivative and correlated markets, nothing seems to justify the price difference. In practice, this is the only scenario in which the index manager will use its discretion in deeming the price unrepresentative.

1.1.5 Modification of the contribution

Contributions can be edited by contributors until Tuesday 13:59 CET. Comments are then mandatory, for each modified category. In order to keep track of any changes, the values of previous contributions are not overwritten, but rejected/invalidated and the new values are saved, as automatically valid.

When calculating the index, only validated contributions will be used (the others are only in the database to keep track in case of an audit).

FinanceAgri has a right to review the changes made between Tuesday 13:00 CET and 13:59 CET, and verifies compliance (including through comments provided by contributors). FinanceAgri can then choose to refuse/invalidate the last contributions and to validate previous ones (from the same week) or not until 14:59 CET.

1.2 Recovery of contributed data

1.2.1 Type of data included in the calculation of benchmarks

SISALMONI measures exporters' selling prices on the basis of documented invoices sent to customers. The prices and tonnes charged to customers will be used as the basis for the calculation. Standard calculations must be used to calculate an FCA Oslo price. For more information

- FCA Oslo is the Contributor's selling price. The main volume of salmon is sold DDP.
- A standard calculation be used. The only information used on each customer invoice is the following

    - Country
    - Incoterm
    - Number of kilos of each size
    - Price in the invoiced currency; (e.g. EUR, GBP, NOK)

Example: If a customer from one country, France, is invoiced 8.00 EUR/kg from 7 different exporters, each exporter will have different costs and margins. But SISAMONI will be exactly the same FCA Oslo. It doesn't matter how it's delivered or/or if the salmon starts in Finnmark or Denmark (delivered by Gannet).

Reportable markets
Only sales to a given list of European countries will be included. Each country is to be assigned a standard freight to be calculated from the DDP delivered to FCA Oslo. Sales to Norwegian customers are included, as well as sales to other contributors.

Reportable products
Sales of Superior salmon will be reported only. Other grades such as ORD, ASC, organic, etc. shall not be reported.
Invoices that must be included in the weekly report
The week starts on Monday 00.01 and ends on Sunday 23.59. All invoices with a billing date within this range must be included in the report

1.2.2 Type of data exclued in the calculation of benchmarks

The exclusion of invoices that meet the requirements for reporting, country, product, and invoice date is normally done in a manual process by the contributor before calculating the final spot price contribution.

The following invoices are excluded:

- Fixed-price delivery contracts with a specified customer

If the contributor can submit written documentation of a contract, the following invoices are excluded:

- Same price agreed for 4 consecutive weeks or more.

Stable volume required for 4-6 week contracts. Defined as a week with the lowest volume, at least 33% of the week.

For example:
- Contracts week 1-4. Delivery 10 trucks week 1 and 4 trucks week 2-4 is a contract
- Contracts for weeks 1-6. Delivery 5 trucks week 1 and 2 trucks week 2-6 is a contract
- Contracts of more than 6 weeks with weekly delivery at the same price regardless of volume
    - Campaigns agreed upon 4 weeks before the first delivery

Same agreed price for 1-3 week delivery, if the price was agreed at least 4 weeks before the first delivery.

For example:
Week 12 of the Easter campaign or weeks 12-13 and the agreed price in week 8 or earlier constitute a contract

- Cash indexed delivery contracts with a specified customer

A delivery contract whose price is decided on the basis of SISALMONI or another similar index or a customer contract based on historical data.

- Internal invoices

Invoices between the Contributor and a company holding 50% or more of the mutual ownership are not defined as prices agreed with an external customer.

- SUP salmon at a non-representative price

The following definitions lead to the exclusion of invoices:

- Salmon slaughtered more than a full week before 00:01 Monday during the reference week. Example: Salmon slaughtered on or before Friday week 1, but not sold and billed until Monday week 3 or later
- Other extraordinary circumstances meant that the salmon was not sold at market price. Examples: Customer refusing delivery or accident on the road. Salmon cannot be sold at market prices
- Incorrect invoices: the customer charged 80 EUR instead of 80 SEK, etc. Normally, the entire invoice is credited and a new correct invoice is generated and declared.

- Technical problems leading to not declaring correct prices

For example:

- Invoice with a discount that is not visible and technically impossible to include in the report. Example: Customer with 5% revenue to pay. Market price 100 NOK and the customer wants to be charged 105 NOK, and have the 5% paid quarterly. If it is not technically possible to calculate 100 correctly, 105 invoices should be excluded.
- Sales office outside Norway. All sales of standard SUPs to customers in Europe shall not be included if technically and practically impossible or if it requires a disproportionate amount of manual labor

- Invoices that the FinanceAgri assessor should not be included

Contributors can propose to exclude invoices that are deemed incorrect. The index manager (the expert) has the freedom to decide to exclude invoices after consultation with the contributor.

1.2.3 Type of data entered for the calculation of benchmarks

The final price is calculated from several different contributors of minimum non-regulated data retrieved during the week in the following order of importance:

This component of the data is important because FinanceAgri prioritizes the relevance of the data according to this characteristic, as will be explained in the rest of the document.

The username and name of the contributor allowing secure identification

All contributions are made from the FinanceAgri contribution system and consist of a login and password automatically generated by the system. A forgotten password system is available for the contributor.

Prices

Every week between Monday from 7.00 CET and Tuesday at 13.00 CET, the 17 exporters must log in to Sitagri in order to fill in the associated price information (in NOK/Kg) in the system for each category:
1-2 kg, 2-3 kg, 3-4 kg, 4-5kg, 5-6 kg, 6-7 kg, 7-8 kg, 8-9 kg, 9+ kg

Volumes

Every week between Monday from 7.00 CET to Tuesday at 13.00 CET, the 17 exporters must log in to Sitagri in order to fill in the associated volume information (in metric tons) in the system for each category:
1-2 kg, 2-3 kg, 3-4 kg, 4-5kg, 5-6 kg, 6-7 kg, 7-8 kg, 8-9 kg, 9+ kg

1.2.4 Data sources

A dedicated FinanceAgri team (data recovery team) is in charge of selecting contributors who are in possession of relevant data for the export price of salmon.
In particular, FinanceAgri ensures the identity of the company and its adherence to the code of conduct defined by FinanceAgri to ensure the integrity of its contributions.

A list of approved contributors is regularly updated for each evaluated product. Moreover, each contributor signs a contribution contract with FinanceAgri, in which he adheres to the code of conduct defined by FinanceAgri and undertakes to provide data with an agreed frequency and modus operandi.
The Code of Conduct is based on ESMA's prerequisites in this area.

If a contributor fails to comply with his or her commitments, in particular on the code of conduct (inappropriate behaviour such as attempts to influence analysts), he or she may be excluded from the list of contributors after examination of the facts by the index supervision function and in particular the Compliance Officer.

The objective of FinanceAgri is to have a large volume of contributors of a varied nature in order to collect data representative of the market to define a fair value.

The data is entered by the contributors into the system developed by FinanceAgri.

Every week between Monday at 7.00 CET and Tuesday at 13.00 CET, the contribution deadline, contributors have the opportunity to enter their contribution.

All pricing times are defined in the calendar available at: https://www.sitagri.com/sitagri-salmon-index

1.2.5 Data security

FinanceAgri stores all the data received on a secure external server hosted by a specialized company Amazon Web Services France.

All the information received is entered in databases, in particular:

1. The contributor ID (identified from a custom login)
2. The name of the contributor
3. The date and time of the entry
4. The price in Nok/kg
5. Volume in metric tonnes
6. Comments

All these elements make it possible to prove the transparency of the data retrieved at all times.

After being analyzed, each piece of data is tagged YES or NO according to its level of quality (YES if it is taken into account in the final evaluation of the price), NO if it is excluded from the final evaluation.

This analysis makes it possible to ensure that the process is respected and in particular to ensure its quality and relevance.

This process makes it possible to identify any errors and/or attempts to manipulate prices by a contributor or any other natural or legal person in relation to FinanceAgri in the determination of the reference price indices (see alert threshold)

All raw data provided is carefully checked by Agri Finance's team of data managers and the names of the parties are disclosed only if they agree. Otherwise, all transmitted data remains anonymous.

1.2.6 Registration requirements

The following records will be kept for a period of 5 years:

- Recording of a calendar with relevant events attended by FinanceAgri employees (Analysts, Experts, Management). These events include in particular meetings with contributors (approved or relevant but not yet authorized to contribute), conferences, etc. The list lists the names of the representatives of Agri Finance.
- Telephone recordings as well as handwritten or electronic notes taken during the communication.
- Recordings of IM conversations.
- Email records.

- Records of all underlying data, including its usage.
- Records of the methodology used to determine the benchmark.
- Records of any judgment or discretionary assessment exercised by the administrator and, where applicable, by the assessors, in determining the benchmark, including the reasons for the judgment or discretionary assessment.
- Records of the underlying data that were discarded, in particular whether the data met the requirements of the benchmark methodology, and the reasons why they were discarded. This information is filled in and stored in a "Observations" field in our IT system.
- Records of other changes and deviations from normal procedures and methodologies, including those that occurred during times of stress or market disruption. This information is filled in and stored in a "Observations" field in our IT system.
- The identities of the submitters (contributors) and the natural persons employed by the administrator for the determination of a benchmark index (e.g. emails exchanged between the data manager and the expert to validate the end-of-day price).
- All documents relating to complaints, including documents submitted by complainants.
- The different versions, changes and updates of the methodology.

1.2.7 Data storage

All data is systematically stored.

The following are recorded in a database and stored for a period of 5 years:

7. The contributor ID (identified from a custom login)
8. The name of the contributor
9. The date and time of the entry
10. The price in Nok/kg
11. Volume in metric tonnes
12. Comments

2. Methodology for processing raw data to convert it into a price valuation. Methodology in the calculation of the benchmark.

This section describes the methodology used by FinanceAgri to arrive at a final price assessment of a product based on the data collected through the process described above.

2.1 Principles of Pricing

First of all, it is important to remember that as an independent index administrator that produces benchmarks of insignificant physical price importance on the commodity markets, FinanceAgri's sole objective is to define price valuations that best reflect the market at a given time for a given product.

FinanceAgri has no financial or other interest in the price level of the commodities on which its indices are based. The evaluations made by FinanceAgri are only based on data entered on a weekly basis by contributors, verified and analyzed by the FinanceAgri team.

Data contributors are selected qualified exporters who:
(a) hold a valid Norwegian salmon export licence;
(b) sell at least five truckloads of fresh superior Atlantic salmon, head-on gutted (HOG), per week, representing approximately 5,000 metric tons per year.

All data entered is verified by FinanceAgri to be taken into account in the final price assessment.

FinanceAgri also ensures that the information entered corresponds to transactions involving companies that are at arm's length from each other in order to reflect a real market price, in order to avoid taking into account prices polluted by internal Group policies.

As the liquidity of the physical commodity markets is uncertain, it may happen that FinanceAgri does not receive a sufficient number of transactions to meet certain requirements. If FinanceAgri collects less than 5 prices/volume from different sources for the same product during the week, FinanceAgri will take into account other verifiable components of the market to define its price, such as standardization (see § 1.1 Standardization).

Under no circumstances are the opinions of market participants on prices and their development taken into account.

2.2 FDJ Prize

2.2.1. FDJ price determination

On Tuesday (or the following day depending on the rules of public holidays, see section on public holidays) at 15.00 CET Sitagri determines the value of the SISALMONI index and 10 other sub-indices (see table below).

The volumes of contributions are normalized according to 2 rules, applied one after the other.

Volume Normalization:
1. Applying the 25% rule
2. 2nd iteration of the 25% rule
3. Applying the 50% rule

25% rule:

If one of the contributors represents more than 25% of the total volume reported, then its importance is limited to 25%.

R	Sum volume of the rest
H	Contributor with more than 25% weight
X	Reduction on highest contributor to be cut

Formula first Contributor above 25%

(H-X) = (R + H - X)*25%

X = (H*0.75 -R*0.25)/0.75

A second pass of the 25% rule is made. Then the 50% rule takes effect.

50% rule:
If the volume contributed by a contributor for a category is more than 50% compared to other contributors in the same category, then a limit is set at 50% for the category concerned.
The following calculation is then applied:

Formula first Contributor above 50%

(H-X) = (R + H - X)*50%

If multiple contributors each account for more than 25% or 50% of the total volume according to the rules outlined above, the limitation is applied to each of the contributors, starting with the contributors with the largest volume. Regarding the 25% rule, only 2 iterations will be made. The 50% rule is applied in the same iteration in order of importance: the modification of the first contributor does not result in the recalculation of the percentages of each contributor before rechecking the threshold of 25 or 50%.

Example 25% rule:
Contributor 5 has a percentage of 30%.

	Contr 1	Contr 2	Contr 3	Contr 4	Contr 5	Total t/size	Size distribution
SUP1-2	200	300	400	100	1400	2400	12,0%
SUP2-3	300	360	480	500	800	2440	12,2%
SUP3-4	400	600	350	700	1500	3550	17,8%
SUP4-5	700	490	700	700	900	3490	17,5%
SUP5-6	600	600	500	900	120	2720	13,6%
SUP6-7	400	400	300	1100	1000	3200	16,0%
SUP7-8	250	250	250	600	200	1550	7,8%
SUP8-9	100		20	300	50	470	2,4%
SUP9+	50			100	30	180	0,9%
	3000	3000	3000	5000	6000	**20000**	100%
Weight:	15%	15%	15%	25%	**30%**	100%	

Contributor 5 is reduced to a total volume corresponding to 25% using the 25% formula. To do this, the 25% calculation must be applied to all volumes of all categories recorded by this contributor.

Example of calculation for contributor 5:
Its total volume is 6,000. The total volume of all categories is 20,000.
We apply the calculation of 25% and we obtain 1,333:

$$6000 - X = (20000 - X)25\%$$
$$1000 = 0{,}75X$$
$$X = 1333$$

We divide 1,333 by 6,000 and we obtain a reduction rate of 22% which will be applied to all volumes in all categories of contributor 5.

The following results are obtained:

Contr 5	Total t/size
1 089	2 089
622	2 262
1 167	3 217
700	3 290
93	2 693
778	2 978
156	1 506
39	459
23	173
4 667	**18 667**
25%	100%

Contributor 5 no longer represents 25% compared to the others.
The 4 re contributor now represents 27% of the total volume. The 25% rule must also be applied in the same way as in the previous step. Only 2 iterations will be made for this rule.

Example 50% rule:
Contributor 5 for Category 1-2 represents more than 50% of the total volume of Category 1-2, a limitation must be made. Same for contributor 4 for categories 8-9 and 9+.

	Contr 1	Contr 2	Contr 3	Contr 4	Contr 5	Total t/size	Size distribution	Weight Contr 1	Weight Contr 2	Weight Contr 3	Weight Contr 4	Weight Contr 5
SUP1-2	200	300	400	91	1 089	2 080	11,4%	9,62%	14,42%	19,23%	4,38%	52,35%
SUP2-3	300	360	480	456	622	2 218	12,2%	13,53%	16,23%	21,64%	20,54%	28,06%
SUP3-4	400	600	350	638	1 167	3 155	17,3%	12,68%	19,02%	11,10%	20,22%	36,98%
SUP4-5	700	490	700	638	700	3 228	17,7%	21,69%	15,18%	21,69%	19,76%	21,69%
SUP5-6	600	600	500	820	93	2 613	14,3%	22,96%	22,96%	19,13%	31,38%	3,57%
SUP6-7	400	400	300	1 002	778	2 880	15,8%	13,89%	13,89%	10,42%	34,80%	27,01%
SUP7-8	250	250	250	547	156	1 452	8,0%	17,21%	17,21%	17,21%	37,65%	10,71%
SUP8-9	100		20	273	39	432	2,4%	23,13%	0,00%	4,63%	63,24%	9,00%
SUP9+	50			91	23	164	0,9%	30,40%	0,00%	0,00%	55,41%	14,19%
	3 000	3 000	3 000	4 556	4 667	**18 223**						
Weight:	16%	16%	16%	25%	26%	100%						

The same process as the 25% rule is applied but the rate is 50% and the 3 volumes are reduced at the same time.

Calculation of the SISALMON Index 3-6 Kg: export selling price (3-4 Kg 30%, 4-5 Kg 40%, 5-6 Kg 30%) volume-weighted price.

Calculation:

30% of the weighted price of Grade 3-4 + 40% of the weighted price of Grade 4-5 + 30% of the weighted price of Grade 5-6

If for one of the 3 categories from 3 to 6kg, no contribution has been provided, then the calculation is not made. An alert is then sent to the FinanceAgri expert. Contributors will have to be contacted in order to correct the calculation. The data manager (the expert) will then have to enter the contribution(s) provided and publish the index manually. If no correction is finally made, then the calculation is not done.

To be validated, a contribution for one category must include at least 2 contributors. If this condition is not fulfilled, the contribution should be refused by FinanceAgri.
If one of the categories (excluding the 3-6kg index) is not supplied (no contributions or less than 2 contributors), FinanceAgri will take the value closest to the category concerned.

When the contributed volume of a category does not exceed 500 kg, FinanceAgri will rely on the value of the category deemed closest, in order to ensure data representativeness.

The other 10 indices are calculated as follows:

SALMON INDICES	INDEX VALUE
SISALMONIAVG (GPA)	Weighted average of each volume-weighted price for each category
SISALMONI1 (1-2 kg en average)	Weighted price according to the volume of the category (1-2 kg)
SISALMONI2 (2-3 kg en average)	Weighted price according to the volume of the category (2-3 kg)
SISALMONI3 (3-4 kg en average)	Weighted price according to the volume of the category (3-4 kg)
SISALMONI4 (4-5 kg en average)	Weighted price according to the volume of the category (4-5 kg)
SISALMONI5 (5-6 kg en average)	Weighted price according to the volume of the category (5-6 kg)
SISALMONI6 (6-7 kg en average)	Weighted price according to the volume of the category (6-7 kg)
SISALMONI7 (7-8 kg en average)	Weighted price according to the volume of the category (7-8 kg)
SISALMONI8 (8-9 kg en average)	Weighted price according to the volume of the category (8-9 kg)
SISALMONI9 (9+ kg average)	Weighted price according to the volume of the category (9+ kg)

- Determination of the alert threshold

In order to determine the alert threshold, we relied on statistical data and on the observation of price trends for the 3 to 6 kg categories. Variations from one session to the next exceeding more than 0.2% are rather rare and are generally initiated by particular events (sudden change in weather conditions, sudden resumption of export activities, appearance of commercial or military conflicts, etc.).
The alert is a measure taken by FinanceAgri internally. The prices submitted by the contributors are systematically verified before the calculation and publication of the index (see diagram) However, the alert allows us to start the investigations as soon as we receive the price, without waiting for the period of determination of the value of the index.

This threshold will be studied and reassessed over time during the annual review of the

methodology.

FinanceAgri will recalculate and disseminate all index values provided that the correction is made before 16:00 CET on the Friday of the reference week. For the other categories, the recalculation threshold is 0.4%.

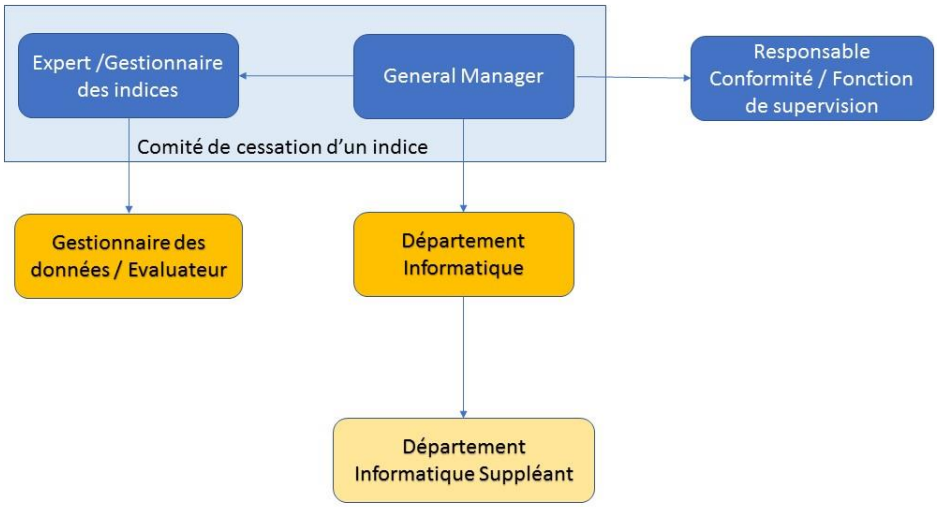
3. Internal control system, monitoring and accountability framework - Internal organization of FinanceAgri to guarantee perfect data integrity.

3.1 Agri Finance Structure

The governance mechanisms in place are intended to protect the integrity of the price evaluation process and to resolve conflicts of interest.

In order to be in line with the company's values, FinanceAgri has established an internal code of conduct as well as internal regulations.

Illustration of the structure of FinanceAgri, an independent index administrator that produces benchmarks:



Every year, FinanceAgri has all its employees sign its code of conduct and its value system. This code reflects Agri Finance's commitment to following its procedures and to being in good faith and honest in all its assessments.

In particular, FinanceAgri undertakes that none of its employees will be remunerated in any way or in any way according to the performance of the published indices.

In order to avoid any conflict of interest and to guarantee the quality of prices, FinanceAgri requires its employees to certify each year that they have no personal relationship or financial interest that could influence their work.
They attest to their objectivity and impartiality in their work.

In addition, in order to guarantee the objectivity of the analyses, FinanceAgri has organised itself into several divisions:

3.1.1. The team in charge of data recovery: the data managers

In charge of data recovery, they use their business expertise to:
- determine whether the information received can be used,
- standardize data,
- Evaluate the market price.

FinanceAgri maintains and regularly updates internal training guides for each of the products assessed to help data managers ensure that the price assessments provided are produced consistently.

The Data Manager is responsible for ensuring compliance with published methodologies as well as internal standards that require records to document their work.

3.1.2. L'expert, gestionnaire d'indices

The role of the index expert/manager is to verify that the published methodology is followed by the data manager.

Each FinanceAgri price evaluation is reviewed prior to publication to ensure that it has been done in line with the FinanceAgri methodology.

All exchanges between the data manager and the expert/index manager, are recorded electronically on a daily basis and are stored for 5 years.

Finally, the index expert/manager also has the role of ensuring that the data manager is regularly trained and evaluated in their market. The Expert/Index Manager regularly evaluates and monitors the Data Manager's adherence to the published methodologies.

3.1.3. The Compliance Manager

The compliance manager intervenes in the event of a presumed conflict of interest. His role is to analyse the situation and arbitrate in relation to a possible conflict of interest.

It is completely outside the pricing process and does not intervene at any time during data collection, analysis or standardization. It also does not interfere in the decisions of the expert/index manager.

The Compliance Officer also oversees benchmarks. In this context, he is responsible for:

-Review at least once a year the definition and method of determining the benchmark.

-Oversee all changes to the benchmark methodology.

-Review and approve the procedures for the termination of the benchmark, including any consultation on termination.

• Evaluate internal and external audits and reviews, and monitor the implementation of identified corrective actions.

• Monitors the input data and contributors, as well as the Administrator's actions to challenge or validate the input data when the benchmark is based on the underlying data of contributors.

-Take effective action in case of violations of the Contributor Code of Conduct when the benchmark is based on the underlying data of Contributors.

-Inform the relevant competent authorities of any inappropriate behavior of the contributors or the administrator and any anomalous or suspicious underlying data.

In the event of the short absence of the compliance officer, the supervision function will be carried out exceptionally by the General Manager. If this absence is prolonged, FinanceAgri will use a competent and independent external service provider to ensure the continuity of the supervisory function.

3.1.4. Defined process in the event of the absence of a key person in the provision of the indices

In order to ensure the continuity of the provision of the indices, in the event of the absence of an employee contributing to it, FinanceAgri has defined, for each person, the substitute who will carry out his or her task. In the absence of the data manager, the expert will collect and evaluate the prices.
In the absence of the expert, the General Manager will ensure the continuity of the provision of the indices.

To manage operational risk, for example the power cut of one of the FinanceAgri offices participating in the publication of the benchmarks (Paris, Rennes, Milan or Geneva), all the data being saved on a secure cloud in real time, the active office will be able to take over and ensure continuity of service without FinanceAgri experiencing an interruption in the publication of its benchmarks.

3.2 Organisation of internal training at FinanceAgri

The internal training courses regularly provided by FinanceAgri have the following objectives:

- Understanding the markets covered by FinanceAgri to examine the data received through the broader lens of the market context.
- Teaching the analyses necessary for the evaluation of a price.
- The techniques of communication with contributors through the various technical means at their disposal (contribution interface, monitored telephone, encrypted instant messaging, email).

All of FinanceAgri's data managers are trained to identify potentially anomalous data so that it is not factored into the final price.
This data corresponds to any information, transaction, offer, incompatible with the standards of the products evaluated and cannot be standardized.

They are supervised by a senior manager (Expert / Index Manager) with significant experience of several years in comparative analysis and price formation.

They are also trained to standardize data and assess the final value of the contract.

In the event of a conflict of interest, attempted manipulation, significant inconsistency or proven and identified error, FinanceAgri undertakes to put in place a corrective procedure as soon as possible (see section 3. Internal control system).

FinanceAgri trains these employees in physical markets and derivatives markets. This helps to identify the factors that make up the price of a commodity. FinanceAgri mainly highlights topics that directly concern its employees, ensuring that they also have a global vision of the markets and the different businesses of their clients.

3.3 Internal control system in place

FinanceAgri first identified the risks that can generate conflicts of interest within its company. Secondly, FinanceAgri has put in place controls to prevent potential conflicts of interest, for example by putting in place guidelines governing any expert judgement or discretionary assessment.

Risk control system

The main risks identified and that could generate a conflict of interest are:

1-Pressure from a shareholder on FinanceAgri,

2-Relationship between FinanceAgri employees and the contributor,

Employee in close relationship with an employee of the contributor,

Participation of an employee in the capital of a contributor,

Remuneration received from an employee by a contributor,

External activities, travel, entertainment, gifts and hospitality received by the employee and from contributors or any other raw materials player,

3-Variable remuneration received by an employee linked to the performance of the indices,

4- Participation in tenders or purchase, sale or negotiations of raw materials.

Risk 1: Pressure from a shareholder on FinanceAgri

1-FinanceAgri is an independent company due to its capital structure and is completely free in the choice of its decisions. Indeed, the legal entities from the sector are very much in the minority and total only 2.5% of the capital.

Risk 2: Relationship between FinanceAgri employees and the contributor

2-Any close relationship must be declared to the FinanceAgri compliance officer. If this relationship is known before the date of hiring of the said employee, the FinanceAgri employee may not participate in the management and provision of the indices under any circumstances.

Any employee participation in the contributor's capital must be declared to FinanceAgri's compliance officer. If this participation is prior to the date of hiring of the said employee, the FinanceAgri employee may not participate in the management and provision of the indices under any circumstances. If this participation is later, the employee will have to leave the position he or she holds in the management of the indices.

Any remuneration received by the employee from a contributor or any other player in the raw materials sector is prohibited. In addition, all external activities, travel, entertainment, gifts and hospitality offers from a contributor or any other commodity player and received by an employee of FinanceAgri must be declared to the compliance officer.

Risk 3: Variable remuneration received by an employee linked to the performance of the indices

3-In order to limit the involvement of FinanceAgri employees in a conflict of interest, each FinanceAgri employee adheres to the company's value system and its code of conduct.

In addition, the employees involved in the management of the indices do not receive any variable remuneration linked directly or indirectly to the performance of the indices.

Generally speaking, the remuneration of employees is based on the qualifications and experience of the candidates.

Risk 4: Participation in tenders or purchase, sale or negotiations of raw materials

4-FinanceAgri employees are prohibited from contributing to the calculation of a benchmark index by taking part in offers to buy or sell or in commodity trading, whether personally or on behalf of market participants.

In addition, no employee has the right, in a personal or professional capacity or through a member of his or her family, to carry out transactions with a direct or indirect link to the indices developed by FinanceAgri.

Finally, FinanceAgri's organisation is compartmentalised in order to avoid any internal or external conflict of interest. Each person involved in the lead process works in a separate office. The collection and analysis of the data is located in Rennes, the administration of the indices is based in Paris.

The collection department, the management of the indices and the monitoring function are hierarchically independent.

However, if an employee of FinanceAgri suspects one of his colleagues or if he fears being involved in a conflict of interest, he must immediately alert the compliance manager who will open an investigation.

A register of proven or potential conflicts of interest will be filled in as and when they are created.

3.4 Appropriate Mechanisms to Mitigate the Risk of a Conflict of Interest

Once a year, the compliance officer takes a sample of recorded communications, emails, instant messaging messages corresponding to 3 days, listens to them, reads them and cross-references the information with the data actually recorded in the database in order to verify their compliance.

If the data handler detects or suspects data manipulation between the data manager and the contributor, an internal investigation is opened.
The Compliance Officer is in charge of the investigation. His first action will be to summon the data manager.
The investigation will be conducted as soon as possible and with all the means at the disposal of the Compliance Officer to find the causes of the non-compliance of the data.

The results of the survey will be made public within a maximum of 1 month. Each user will receive a press release by email relating to the conflict of interest that has occurred. All details of the investigation will be kept in the conflict of interest register for a period of 5 years.

If a conflict of interest is found, disciplinary action will be taken for each member who participated in the conflict of interest.
If the person is an employee of FinanceAgri, he or she will be immediately permanently excluded from the management of the indices. Depending on the seriousness of the conflict of interest, the penalty may go as far as exclusion from the company.
If a contributor is involved, he or she may immediately be excluded from the list of contributors depending on the seriousness of the facts.

In all cases of proven or supposed conflicts of interest, access to the information system will

be immediately suspended as soon as the alleged or proven offence becomes aware and until the end of the investigation.

3.5 Mechanisms used by the administrator to determine whether the methodology is verifiable and reliable

Once a year, the compliance manager checks the consistency and reliability of the methodology.
It takes a sample of 1 day's data per index and determines the FDJ price by strictly adhering to the methodology.

The price found will be compared to the FDJ price actually published.

In the event of a distortion, a thorough investigation will be conducted by him to define the cause of the error, in partnership with the General Manager. If it turns out that the error is due to a methodology reliability issue, the procedure to update the methodology in a shorter period of time will be triggered. (Cf. 4.3. Updated Methodology)

3.6 External Audit

FinanceAgri will appoint an independent audit firm with appropriate experience and the necessary capacities to verify and report on FinanceAgri's compliance with the methodological criteria set and the requirements of the Benchmark Regulation. Audits will take place once a year and will be published three months after the conclusion of each audit. Further interim audits will be conducted if deemed necessary.

3.7 Audit of Contributors

FinanceAgri carries out audits and controls of Contributors and may choose to use external auditors to assist in these procedures. These audits check the quality of the contributor's report configuration, including routines, systems, and knowledge. The edits also include detailed random edits on sales missed for a number of weeks, included in the input data reported by contributors' internal systems such as Maritech's.
FinanceAgri will be able to control in particular:
- The automatic sorting of invoices according to 2 criteria, whether or not they are cash.
- Calculations of certain costs according to the standards in force (fixed costs, transport costs. Non-exhaustive list).
- Currencies and billing date.
- Whether or not the selected countries and product codes are part of the defined contribution field.
- Manually unselected invoices for the audited week.
-Whether invoices from countries within the scope of the index should be included in the weekly report.

4. The means available to users to contact FinanceAgri in order to clarify certain published data or to dispute them.

4.1 Complaint Management

FinanceAgri strives to provide the highest quality assessments possible to increase the transparency of physical commodity markets.

If FinanceAgri's clients or market players have any questions about the methodology, the approach taken to the price evaluations, or the evaluations themselves, they can contact FinanceAgri to request clarification by email at the following address : complaints@financeagri.com

FinanceAgri undertakes to acknowledge receipt of a complaint to the customer, within 8 working days. From the acknowledgement of receipt, FinanceAgri undertakes, within 1 month, to analyse the complaint internally, to process it and to respond in writing.
The person responsible for handling the complaint and responding to the customer will be the compliance officer.

All correspondence about the complaint is stored in a complaint register for 5 years.

Price Complaint

In the event of a complaint about a price (disagreement on the price), the FDJ price is checked and if it turns out that the complaint is justified, the FDJ price will be changed in our database and an email communication including detailed information of the change will be sent to all recipients of the published indices.

Complaint about the administrator and his staff

A diligent and impartial investigation is conducted by the compliance officer in order to trace the calculation and verify the validity of the complaint and the penalties provided for will be applied.

Procedures for recourse

In the event that the complainant is not satisfied with the response to his complaint, he has the possibility to contact an independent third party, appointed by the administrator, within 6 months of the date of filing of the initial complaint.
This independent third party will verify that the procedure governing the handling of the complaint has been followed.
All documents relating to the complaint will be kept for a minimum of 5 years.

4.2 Corrections

FinanceAgri has created its methodology to maximize the objectivity and reliability of its price assessments.
All valuations are submitted on the basis of available data prior to the close of contracts.
Any information sent to FinanceAgri after the close of the contracts will not be taken into account in today's evaluation.

However, if the Management of FinanceAgri deems that a published evaluation is incorrect, FinanceAgri will correct the error and give an explanation for this modification which it will keep for 5 years.

The General Manager, once the review has been completed by the expert or index manager, is responsible for approving the methodology once modified.

4.3 Updates to the methodology

Like all markets, commodity markets are evolving. It is important that the FinanceAgri methodology accurately reflects how they work, which may require adaptations to the published methodology.

FinanceAgri is constantly listening to market players to ensure that its methodology accurately reflects the physical market evaluated.

Thus, any changes to the methodology will be made after consultation with market participants. Each year, market participants will be encouraged to provide feedback on the methodology. Any remarks on the methodology or any request for updates will be considered. Any updates to the methodology will be approved and validated by the General Manager before being made public.

This meeting will take place between the end of the harvest of year n and the beginning of the campaign of year n+1

Before the proposed changes are effective, they will be published for a period of time that is sufficient to gather public comment.
FinanceAgri's responses to comments will also be published unless the commenter specifically requests them to remain anonymous.

AgriFinance will publicly indicate the date on which any changes will become effective and apply to the price assessment.

The review will be carried out once a year by the Compliance Officer.

After each change, the expert will review the changes made and the General Manager will be in charge of the final validation.

In addition, for one-off changes, the expert will be in charge of the review with the compliance officer.

In the event of a proven or supposed conflict of interest or an act compromising the objectivity of the person's assessment, he or she will be immediately removed from the validation or approval process

5. Procedure to be followed by the administrator in the event of changes or termination of a benchmark (Art. 28 of the Regulation).

Like all markets, commodity markets are evolving. It is important that the nature of Agri Finance's benchmarks accurately reflect the functioning of its markets, which may require changes in the structure of the published indices.

Thus, any changes or deletions to the benchmarks will be made after consultation with market participants. Users will be informed of any changes or withdrawals of the benchmarks, 1 month in advance, with the detailed characteristics of the new index.

During this 1-month period, all user feedback will be analyzed and processed to take into account adjustments, if any.

6. Code of Conduct signed by each contributor

FinanceAgri is an independent index administrator that produces physical price benchmarks in agricultural commodity markets.
These indices are in line with the Benchmark Regulation defined by ESMA.

The Code of Conduct (annexed to this accreditation file) defined by FinanceAgri establishes the guidelines that contributors providing data must comply with in order for their contributions to be taken into account in the establishment of a reference price.

Through the data they provide, contributors directly affect the final price. It is therefore essential that contributors follow the data submission procedures in order to maintain the integrity of the data.

This code of conduct has therefore been written to make each contributor aware of the importance of the information he or she transmits and the procedures to follow to transmit this information.