



Myrtle Equities

ESMA Benchmark Regulation Guideline

This document outlines the standards and compliance measures Myrtle Equities implements to adhere to the European Securities and Markets Authority (ESMA) Benchmark Regulation (BMR). This regulation governs the creation, maintenance, and administration of financial benchmarks within the European Union, ensuring transparency, reliability, and accountability. The document details Myrtle Equities' approach to governance, oversight, data integrity, and conflict of interest management, aligning with ESMA's rigorous requirements. By adhering to the ESMA BMR, Myrtle Equities reinforces its commitment to delivering indices that meet the highest regulatory and industry standards in the EU.

*Global Regulatory Framework
Methodologies Document*



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1. Introduction

The European Securities and Markets Authority (ESMA) Benchmark Regulation (BMR) provides a comprehensive regulatory framework to ensure the integrity, transparency, and reliability of financial benchmarks within the European Union. Myrtle Equities Global LLC, as a leading index provider, is fully committed to adhering to this regulation. Through robust governance structures, operational procedures, and compliance mechanisms, the company ensures that its indices align with global best practices and foster market confidence. This document outlines the company's approach to meeting the BMR's regulatory requirements, demonstrating Myrtle Equities' dedication to transparency and accountability in benchmark administration.

2. Scope of the Regulation

The ESMA BMR is applicable to administrators, contributors, and users of benchmarks within the European Union. As a benchmark administrator, Myrtle Equities complies with all relevant aspects of this regulation. Specifically, the company focuses on governance and oversight, ensuring robust processes for benchmark administration. Transparency in methodology and input data is a priority, along with comprehensive management of conflicts of interest. Myrtle Equities also maintains rigorous operational controls to safeguard the integrity of its benchmarks. This regulation applies to all benchmarks used in financial instruments, contracts, and investment funds governed by EU law, and Myrtle Equities is dedicated to meeting these stringent standards.

3. Governance Framework

Myrtle Equities has established a strong governance framework to ensure compliance with the ESMA BMR. The Oversight Committee plays a critical role in this structure, providing independent supervision of benchmark operations. The committee is tasked with ensuring adherence to the regulation, reviewing and approving benchmark methodologies, and monitoring potential conflicts of interest to maintain impartial decision-making. Its composition reflects a balance of expertise and independence, guaranteeing objective oversight of benchmark administration processes. In addition, Myrtle Equities has implemented a conflict-of-interest policy in compliance with Article 4 of the regulation. This policy includes measures such as separating index calculation from commercial functions, conducting regular audits to maintain impartiality, and disclosing potential conflicts in publicly available methodology documents.

4. Benchmark Methodology

Myrtle Equities places significant emphasis on transparency in benchmark methodologies, in line with the requirements of the ESMA BMR. Detailed methodology documents for all indices are published, providing comprehensive information on the objectives and design of each index, the sources and nature of input data, the calculation procedures, and the governance measures ensuring methodological robustness. To maintain the relevance and accuracy of its indices, Myrtle Equities conducts regular reviews of its methodologies as mandated by Article 5. These reviews address changes in market conditions, ensure the methodologies remain fit for purpose, and incorporate feedback from stakeholders and the Oversight Committee. By doing so, Myrtle Equities upholds its commitment to producing reliable and transparent benchmarks.

5. Data Integrity

Ensuring data integrity is a cornerstone of Myrtle Equities' compliance with the ESMA BMR. Input data used in benchmark calculations is held to the highest standards of accuracy, reliability, and representativeness. Transaction-based data is prioritized whenever possible, and clear hierarchies and fallback procedures are in place for instances where such data is unavailable. To further enhance data reliability, Myrtle Equities regularly audits its data sources. In compliance with Article 8 of the BMR, detailed records of input data, calculations, and decision-making processes are maintained for a minimum of five years. This comprehensive recordkeeping approach supports transparency and facilitates regulatory audits.

6. Contingency Plans

To address potential disruptions, Myrtle Equities has developed robust contingency plans in accordance with Article 28 of the BMR. These plans outline clear procedures for the cessation or material change of a benchmark. Communication protocols ensure that stakeholders are promptly informed of significant changes, while predefined action plans manage the operational impact of such events. Additionally, procedures for transitioning to alternative benchmarks are established to ensure continuity and mitigate market disruptions. By implementing these measures, Myrtle Equities reinforces its commitment to maintaining reliable benchmarks under all circumstances.

7. Registration and Supervision

Myrtle Equities is officially registered as a benchmark administrator with the relevant competent authority under Article 34 of the BMR. This registration affirms the company's full compliance with all applicable regulatory requirements. It also subjects Myrtle Equities to periodic supervision and audits

by regulatory bodies, ensuring continued adherence to the highest standards of benchmark administration.

8. Stakeholder Engagement

Engaging with stakeholders is a key component of Myrtle Equities' approach to benchmark administration. The company conducts public consultations on significant methodology changes to gather valuable feedback and ensure that its indices meet market needs. Open communication channels are maintained to facilitate stakeholder input, and annual compliance reports are published to provide transparency into Myrtle Equities' adherence to regulatory requirements. These efforts reflect the company's dedication to fostering trust and collaboration with all market participants.

9. Conclusion

Myrtle Equities' commitment to compliance with the ESMA Benchmark Regulation underscores its dedication to integrity, transparency, and accountability. By adhering to the stringent requirements of the BMR, the company ensures its indices serve as reliable and trusted benchmarks that support market stability and investor confidence. This document demonstrates Myrtle Equities' ongoing efforts to align with regulatory standards and uphold the highest levels of operational excellence.

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