

STATEMENT OF COMPLIANCE WITH THE IOSCO PRINCIPLES FOR FINANCIAL BENCHMARKS

January 1, 2025 – December 31, 2025



BORSA
İSTANBUL

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1. Management's Statement of Compliance

As Management of İstanbul, we are responsible for ensuring Borsa İstanbul's compliance with the Principles for Financial Benchmarks published by the International Organization of Securities Commissions (IOSCO).

This responsibility includes designing, implementing, and monitoring the effectiveness of the necessary policies, procedures, and control mechanisms to ensure compliance with the aforementioned IOSCO Principles.

In this context, we declare that Borsa İstanbul has established appropriate policies, procedures, and control mechanisms to ensure compliance with the IOSCO Principles for Financial Benchmarks, which it administers, and that it has effectively implemented processes consistent with these policies, procedures, and control mechanisms throughout the period from January 1, 2025, to December 31, 2025.

Detailed explanations regarding Borsa İstanbul's compliance with the IOSCO Principles for Financial Benchmarks are provided in Section 3. The information relating to the aforementioned period has been prepared in a comprehensive and truthful manner to meet the common needs of a wide range of users. Accordingly, it should be acknowledged that the aforementioned explanations may not include every element that individual users may deem important within the context of their own specific circumstances.

Özgür ASLAN
Director
February 27, 2026

Güzhan GÜLAY
Executive Vice President
February 27, 2026

2. Overview of Borsa İstanbul

With its roots dating back to 1873, Borsa İstanbul A.Ş. is the regulated market of Türkiye. Extending from Dersaadet Tahvilat Borsası to formerly known İstanbul Menkul Kıymetler Borsası - İMKB (İstanbul Stock Exchange) in 1985, Borsa İstanbul adopted a new vision in 2012 by completing its horizontal integration (merger with derivatives and precious metals exchanges) and vertical integration (majority shareholder status at İstanbul Settlement and Custody Bank (Takasbank) and Central Securities Depository of Türkiye (MKK)). Pursuant to Article 138 of the enacted Capital Markets Law No. 6362 (CML) published in the Official Gazette on December 30, 2012, Borsa İstanbul A.Ş. was formed for the purpose of serving as a securities exchange. Accordingly, Borsa İstanbul Exchange Group structure, providing access to Turkish capital markets with a wide range of financial services, was established. With an integrated business model, Borsa İstanbul Exchange Group offers listing, trading, settlement and custody operations of capital markets instruments, notably equities, derivative products, fixed-income securities, precious metals and diamonds and Islamic finance products.

In an effort to harmonize the Turkish capital markets regulation with the EU *acquis* and improve the integration of the Turkish capital markets with the global markets and enhance competitiveness thereof, Turkish law maker enacted the CML as a reform making law, bringing about not only liberalization of the activity of running organized markets, but also re-structuring and re-branding of İMKB as Borsa İstanbul.

Borsa İstanbul brings together all the exchange operations in the Turkish capital markets under a single roof. Its Articles of Association was prepared by the Capital Markets Board of Türkiye (CMB), and following its approval by the Minister in charge, it was registered on April 3, 2013, thereby receiving a foundation and operation permit; and eventually completing the process of re-branding of İMKB as Borsa İstanbul. Established on the basis of CML, Borsa İstanbul is subject to private law. Borsa İstanbul is a self-regulatory entity.

Borsa İstanbul is a regulated market of Türkiye and is subject to regulation by the CMB. It has received a positive assessment from the European Securities and Markets Authority (ESMA), the EU's securities market regulator, and is listed as third-country trading venue ([TCTV](#)) that meets the post-trade transparency requirements under MiFID II and MiFIR.

The main purpose and field of activity of Borsa İstanbul is described as follows: "In accordance with the provisions of the Law and the related legislation, to ensure that capital markets instruments, foreign currencies, precious metals and gems, and other contracts, documents, and assets approved by the CMB are traded subject to free trade conditions in a facile and secure manner, in a transparent, efficient, competitive, fair and stable environment; to create, establish and develop markets, sub-markets, platforms, systems and other organized market places for the purpose of matching or facilitating the matching of the buy and sell orders for the above mentioned assets and to determine and announce the discovered prices; to manage and/or operate the aforementioned or other exchanges or markets of other exchanges; and to carry out the other activities listed in its Articles of Association."

In line with the activities, Borsa İstanbul calculates variety of indices and rates to follow the movements of markets, to be an underlying asset for the financial products, and to be used as a benchmark for collective investment instruments.

Within this framework, Borsa İstanbul calculates;

- BIST Stock Indices, designed to measure the market performance of stocks trading on Equity Market,
- BIST-KYD Indices, designed to track the returns of variety of financial instruments such as debt securities, gold, bank deposit, profit share and mutual funds,
- BIST Sustainability Themed Debt Securities Indices, designed to measure the daily returns of debt securities that is qualified "Sustainable Debt Security" or "Green Debt Security",
- BIST Risk Control Indices, designed for investors who wish to gain exposure to the underlying stock index at a pre-determined target risk level (target volatility),
- BIST Leveraged and Short Indices designed to reflect the performance of underlying stock index with in the same or opposite direction at a certain leverage ratio,
- BIST Commodity and Commodity Denominated Securities Indices, to measure daily returns of gold, silver, platinum and palladium prices, and daily returns of gold bonds and gold denominated lease certificates issued by Republic of Türkiye Ministry of Treasury (HMB) and Finance and Undersecretariat of Treasury Asset Leasing Company (HMKVŞ),
- TLREF Turkish Lira Overnight Reference Rate and BIST TLREF Index, which is created in order to track the returns of TLREF rate that is calculated by using the overnight repo transactions, that are secured by TL denominated government debt securities and CBRT liquidity bills and realized on Borsa İstanbul Repo-Reverse Repo Market,
- TLREFK Turkish Lira Overnight Participation Reference Rate and BIST TLREFK Index, which is created in order to track the returns of TLREFK rate that is calculated by using the return rates that are realized on Borsa İstanbul Committed Transactions Market,
- Customized Stock Indices, designed to suit clients' unique mandates or investment strategies.

More information is available on [Borsa İstanbul official website](#).

3. Principles and Responses

The information presented in Section 4 below sets out the response of Borsa İstanbul in terms of how it meets the objectives and functions of the IOSCO Principles for Financial Benchmarks

A. GOVERNANCE

IOSCO Principle

A Benchmark should have appropriate governance arrangements in place to protect the integrity of the Benchmark and to address conflicts of interests.

Borsa İstanbul's Response

Borsa İstanbul has established a robust and effective management and control system to maintain the integrity of financial benchmarks, ensure their quality, and prevent potential conflicts of interest.

Borsa İstanbul, enacts "The Directive", which was created to regulate the procedures and principles regarding the creation, calculation, publication, operations, audit and administration of Financial Benchmarks in compliance with the IOSCO Principles. The Directive is based on Article 29/A of "The Regulation on Principles of Foundation, Activities, Operations and Audit of Exchanges and Market Operators" and Article 32/A- 32/Ė of "Borsa İstanbul A.Ş. Regulation on Principles Relating to Exchange Activities", which are enacted by CMB.

Besides, based on the aforementioned Directive, Borsa İstanbul has published "The Management Procedure", "The Conflicts of Interest Procedure", "The Whistleblowing Procedure" and "The Complaint Procedure". All of these regulations create an overarching regulatory framework for Borsa İstanbul's Financial Benchmarks, focusing on the governance arrangements, accountability and the quality of the Financial Benchmark and the Methodology.

Aforementioned [regulations, directive and procedures](#) are publicly available on Borsa İstanbul official website.

Principle 1: Overall Responsibility of the Administrator

IOSCO Principle 1

The Administrator should retain primary responsibility for all aspects of the Benchmark determination process. For example, this includes:

Development: The definition of the Benchmark and Benchmark Methodology;

Determination and Dissemination: Accurate and timely compilation and publication and distribution of the Benchmark;

Operation: Ensuring appropriate transparency over significant decisions affecting the compilation of the Benchmark and any related determination process, including contingency measures in the event of absence of or insufficient inputs, market stress or disruption, failure of critical infrastructure, or other relevant factors; and

Governance: Establishing credible and transparent governance, oversight and accountability procedures for the Benchmark determination process, including an identifiable oversight function accountable for the development, issuance and operation of the Benchmark.

Borsa İstanbul's Response

Borsa İstanbul maintains responsibility over all aspects of the Financial Benchmark determination process.

- a) Borsa İstanbul, supported by committees which are part of the governance structure as described in Article 4 and 5 of The Management Procedure, is responsible for the development of Financial Benchmarks as well as their corresponding Benchmark Methodologies.

Benchmark Methodologies set out the definition and practice to be followed for the construction and ongoing operations of the Financial Benchmarks. Benchmark Methodologies of existing Financial Benchmarks are reviewed and updated regularly to ensure they continue to reflect market practice.

The Financial Benchmark creation process is conducted under the oversight of the committees, defined in Articles 4 and 5 of The Management Procedure. Benchmark Methodologies are developed in alignment with applicable laws and internal regulations, subject to review for compliance by the "Legal Affairs and Compliance Directorate" of Borsa İstanbul. Afterwards they are reviewed and approved by the "Decision-

Making Body” determined in Article 4 of The Management Procedure.

All [Benchmark Methodologies](#) are publicly available on Borsa İstanbul official website.

- b) Financial Benchmark calculation and dissemination processes are automated at Borsa İstanbul. The process of Financial Benchmarks dissemination follows the process of their calculation. In order to ensure the reliability and integrity of the Financial Benchmarks, Borsa İstanbul performs the calculation and dissemination of the Financial Benchmarks with appropriate software and hardware systems, controls the data used in the calculation of the Financial Benchmarks to the extent possible and includes them in the calculations. The responsibility for the dissemination of Financial Benchmarks to its licensed direct clients and licensed intermediaries (such as data vendors) is defined within Borsa İstanbul’s contractual arrangements for benchmark and data services licensing.
- c) Decisions affecting the determination of the Financial Benchmark are publicly disclosed via [Index Announcements](#) on the Borsa İstanbul official website (for example changes in constituents of Financial Benchmarks and Benchmark Methodologies).

Respective Benchmark Methodologies contain provisions concerning Financial Benchmark determination processes in case of absence or insufficient inputs and technical deficiencies. In such cases, Borsa İstanbul is responsible for undertaking measures to ensure the accuracy of the Financial Benchmark. Borsa İstanbul backs up the software and hardware systems used in all processes, including the development, determination and dissemination of Financial Benchmarks.

Borsa İstanbul has a [Business Continuity Policy](#) in place to cover disruptions both to technical and office infrastructure, thus ensuring the continuity of the business. All employees of Borsa İstanbul attend annual trainings concerning internal policies aimed at business continuity and prevention of infrastructure disruptions.

- d) The Committee provides governance and internal oversight in regarding all aspects of Financial Benchmark determination activity. Responsibilities of The Committee include, without limitation, overseeing Financial Benchmark determination activity undertaken by the employees of Borsa İstanbul, including reviewing and challenging all aspects of (i) Benchmark design, (ii) the integrity of Financial Benchmark determination processes, and (iii) relevant Control Frameworks. The roles and responsibilities of The Committee are further described in The Management Procedure.

Principle 2: Oversight of Third Parties

IOSCO Principle 2

Where activities relating to the Benchmark determination process are undertaken by third parties – for example collection of inputs, publication or where a third-party acts as Calculation Agent – the Administrator should maintain appropriate oversight of such third parties. The Administrator (and its oversight function) should consider adopting policies and procedures that:

- a) Clearly define and substantiate through appropriate written arrangements the roles and obligations of third parties who participate in the Benchmark determination process, as well as the standards the Administrator expects these third parties to comply with;
- b) Monitor third parties’ compliance with the standards set out by the Administrator;
- c) Make available to Stakeholders and any relevant Regulatory Authority the identity and roles of third parties who participate in the Benchmark determination process; and
- d) Take reasonable steps, including contingency plans, to avoid undue operational risk related to the participation of third parties in the Benchmark determination process.

This Principle does not apply in relation to a third party from whom an Administrator sources data if that third party is a Regulated Market or Exchange.

Borsa İstanbul’s Response

Borsa İstanbul may outsource certain activities of the Financial Benchmark determination processes to third parties and monitors and controls outsourcing and data supply processes accordingly. Principles regarding outsourcing and data procurement are regulated in Article 6.6. of The Management Procedure.

Borsa İstanbul, does not have any Financial Benchmark calculated by a third party but uses a number of third-party data in determination of Financial Benchmarks.

Some of those data including sustainability scores, debt securities and lease certificates prices, gold silver, platinum and palladium prices and currency exchange rates are provided by data vendors such as Bloomberg and LSEG. Borsa İstanbul has written agreements with its outsourcing partners, which define the roles and obligations of parties

and provisions regarding termination of the service.

Other third-party data including currency exchange rates and CPI (Consumer Price Index published by Turkish Statistical Institute) based Reference Index Values are publicly available in official websites of specific state-owned institutions authorized by law to make the related data available to the public such as CBRT and HMB.

Borsa İstanbul asks its Licensees' and Stakeholders' opinions which third party data to use in Financial Benchmarks during the design phase and choose the data that are widely used by financial institutions and market professionals as a market standard. Borsa İstanbul takes third party's experience and reliability, and potential conflicts of interest into consideration before choosing the third party.

All data used in determination of Financial Benchmarks and their providers are stated in respective Benchmark Methodologies. The Committee reviews third party data used in the determination of Financial Benchmarks at least once a year in order to ensure that the data and the third party comply with the intended service levels and standards.

Principle 3: Conflicts of Interest for Administrators

IOSCO Principle 3

To protect the integrity and independence of Benchmark determinations, Administrators should document, implement and enforce policies and procedures for the identification, disclosure, management, mitigation or avoidance of conflicts of interest.

Administrators should review and update their policies and procedures as appropriate. Administrators should disclose any material conflicts of interest to their users and any relevant Regulatory Authority, if any. The framework should be appropriately tailored to the level of existing or potential conflicts of interest identified and the risks that the Benchmark poses and should seek to ensure:

- a) Existing or potential conflicts of interest do not inappropriately influence Benchmark determinations;
- b) Personal interests and connections or business connections do not compromise the Administrator's performance of its functions;
- c) Segregation of reporting lines within the Administrator, where appropriate, to clearly define responsibilities and prevent unnecessary or undisclosed conflicts of interest or the perception of such conflicts;
- d) Adequate supervision and sign-off by authorized or qualified employees prior to releasing Benchmark determinations;
- e) The confidentiality of data, information and other inputs submitted to, received by or produced by the Administrator, subject to the disclosure obligations of the Administrator;
- f) Effective procedures to control the exchange of information between staff engaged in activities involving a risk of conflicts of interest or between staff and third parties, where that information may reasonably affect any Benchmark determinations; and
- g) Adequate remuneration policies that ensure all staff who participate in the Benchmark determination are not directly or indirectly rewarded or incentivized by the levels of the Benchmark.

An Administrator's conflict of interest framework should seek to mitigate existing or potential conflicts created by its ownership structure or control, or due to other interests the Administrator's staff or wider group may have in relation to Benchmark determinations.

To this end, the framework should:

- a) Include measures to avoid, mitigate or disclose conflicts of interest that may exist between its Benchmark determination business (including all staff who perform or otherwise participate in Benchmark production responsibilities), and any other business of the Administrator or any of its affiliates; and
- b) Provide that an Administrator discloses conflicts of interest arising from the ownership structure or the control of the Administrator to its Stakeholders and any relevant Regulatory Authority in a timely manner.

Borsa İstanbul's Response

Borsa İstanbul's employees are restricted from participating in trading activities according to Article 23 of "Regulation on Establishment, Activity, Working and Audit Principles of Exchanges and Market Operators", thus no material conflict of interests may arise.

Since Borsa İstanbul is a regulated market of Türkiye and is subject to regulation by the CMB, Borsa İstanbul's business connections do not cause any conflict of interest in relation to Financial Benchmarks. Borsa İstanbul's revenue may include fees linked to financial products based on its Financial Benchmarks licensed to clients and

being traded on its platforms, such as Derivatives Market. However, Borsa İstanbul provides only the trading infrastructure and does not hold any position in the Financial Benchmarks directly or indirectly.

Borsa İstanbul enforces policies and procedures, which are periodically reviewed by The Committee, to mitigate and avoid conflicts of interest in determination of Financial Benchmarks. Additionally, Borsa İstanbul enacts The Conflicts of Interest Procedure and employees are subject to continuous training on ethics, prevention of conflicts of interest, information security and confidentiality. Borsa İstanbul has organized the management and supervision of its Benchmark Administration activity in a manner which seeks to manage and mitigate conflicts of interest that may arise.

Only publicly available information is used in Financial Benchmark determination processes. Benchmark Methodologies are based on objective rules and publicly available on Borsa İstanbul official website. Benchmark Methodology changes are announced and the data used in Financial Benchmark determination processes are disseminated transparently. All employees of Borsa İstanbul, including The Committee are required to sign "Commitment of Information Security" and conduct their business activities in line with well documented processes and procedures established in relation to the administration of Financial Benchmarks and in accordance with The Conflicts of Interest Procedure, other internal regulations and relevant laws. Only the authorized employees can participate in and no one apart from them can influence the Financial Benchmark determination processes. Thus, there is no conflict of interest arising from the employees and the Borsa İstanbul's ownership structure.

Financial Benchmark determinations and disseminations are performed by automated and redundant systems which are subject to proper user acceptance tests and predefined release management arrangements. All data used in the determination processes input automatically from integrated systems as much as possible and Four-Eyes Principle is applied to the data which needs human intervention. All systems and processes are well structured so that only authorized employees can access and all accesses are reported. Additionally, Financial Benchmark determination processes are supervised by senior employees daily in order to ensure that they are performed adequately.

The goals, rewards and incentives for the employees involved in the administration and determination of Financial Benchmarks are not directly or indirectly tied to the performance of the Financial Benchmarks.

Borsa İstanbul handles possible conflicts of interest arising from employees, business relationships or ownership structure in accordance with Article 7 of The Directive, Article 10.3 of The Management Procedure and Article 8 of The Conflicts of Interest Procedure; undertakes to disclose unmanageable conflicts of interest if they arise.

Principle 4: Control Framework

IOSCO Principle 4

An Administrator should implement an appropriate control framework for the process of determining and distributing the Benchmark. The control framework should be appropriately tailored to the materiality of the potential or existing conflicts of interest identified, the extent of the use of discretion in the Benchmark setting process and to the nature of Benchmark inputs and outputs.

The control framework should be documented and available to relevant Regulatory Authorities, if any. A summary of its main features should be Published or Made Available to Stakeholders.

This control framework should be reviewed periodically and updated as appropriate. The framework should address the following areas:

- a) Conflicts of interest in line with Principle 3 on conflicts of interests;
- b) Integrity and quality of Benchmark determination:
 - i. Arrangements to ensure that the quality and integrity of Benchmarks is maintained, in line with principles 6 to 15 on the quality of the Benchmark and Methodology;
 - ii. Arrangements to promote the integrity of Benchmark inputs, including adequate due diligence on input sources;
 - iii. Arrangements to ensure accountability and complaints mechanisms are effective, in line with principles 16 to 19; and
 - iv. Providing robust infrastructure, policies and procedures for the management of risk, including operational risk.
- c) Whistleblowing mechanism: Administrators should establish an effective whistleblowing mechanism to facilitate early awareness of any potential misconduct or irregularities that may arise. This mechanism should allow for external reporting of such cases where appropriate.

- d) Expertise:
 - i. Ensuring Benchmark determinations are made by personnel who possess the relevant levels of expertise, with a process for periodic review of their competence; and
 - ii. Staff training, including ethics and conflicts of interest training, and continuity and succession planning for personnel.

Where a Benchmark is based on Submissions:

Administrators should promote the integrity of inputs by:

- a) Ensuring as far as possible that the Submitters comprise an appropriately representative group of participants taking into consideration the underlying Interest measured by the Benchmark;
- b) Employing a system of appropriate measures so that, to the extent possible, Submitters comply with the Submission guidelines, as defined in the Submitter Code of Conduct and the Administrators' applicable quality and integrity standards for Submission;
- c) Specifying how frequently Submissions should be made and specifying that inputs or Submissions should be made for every Benchmark determination; and
- d) Establishing and employing measures to effectively monitor and scrutinize inputs or Submissions. This should include pre-compilation or pre-publication monitoring to identify and avoid errors in inputs or Submissions, as well as ex-post analysis of trends and outliers.

Borsa İstanbul's Response

Borsa İstanbul is a regulated market of Türkiye, is subject to regulation by the CMB and it is listed by ESMA as Third Country Trading Venue that meets the post-trade transparency requirements under MiFID II and MiFIR.

Borsa İstanbul has implemented a well-documented risk-based Control Framework in all areas of the Financial Benchmark administration process. Areas include:

- i. Financial Benchmark design, launch and cessation;
- ii. Changes to Benchmark Methodology;
- iii. Periodic index review and adjustment;
- iv. Financial Benchmark monitoring and surveillance;
- v. Processing of input data and corporate actions;
- vi. Incident and unexpected event management.

In addition, the Control Framework covers IT general controls, such as controls over access rights, application change management and data security.

The Committee is responsible for identifying risks in Financial Benchmark administration, including conflicts of interest, operational issues and compliance aspects. It is also responsible for reviews of the Control Framework in terms of its design and operating effectiveness.

Borsa İstanbul's Control Framework addresses conflict of interest issues as explained in its response to IOSCO Principles 3 in detail.

Borsa İstanbul has taken necessary measures to ensure that the integrity and quality of the Financial Benchmarks are maintained in the determination processes. Actions taken by Borsa İstanbul, regarding the integrity and quality of the Financial Benchmarks including adequate due diligence on input sources, are explained in the responses to IOSCO Principles 6 – 15, under the main titles of "Quality of the Benchmark" and "Quality of the Methodology" in detail.

Borsa İstanbul has enacted The Whistleblowing Procedure in order to address and report any potential misconduct or irregularity. It has also implemented a dedicated accountability and complaints policy as explained in the responses to IOSCO Principles 16 – 19, under the main title of "Accountability" in detail.

All processes of Borsa İstanbul where the frameworks are determined by "[Borsa İstanbul A.Ş. Information Security Policy](#)", "[Borsa İstanbul A.Ş. IT Service Management System Policy](#)", "[Borsa İstanbul A.Ş. Business Continuity Policy](#)" and "[Borsa İstanbul A.Ş. Risk Management Policy](#)" are covered in the scope of corporate risk management system, internal control system and business continuity management system.

At Borsa İstanbul, the effective management of risks is a fundamental component of the corporate strategy and an important step in the successful execution of activities. Corporate risk management methodology was adopted to achieve continuous and timely identification, measurement and assessment, monitoring, mitigation and reporting of existing or potential risks which may have an impact on achieving the specified strategic objectives of the company. Three Lines of Defence model was adopted under corporate risk management framework. The main objective of this model is to manage and control risks which may prevent the realization of the corporate strategies and goals effectively, and to provide reasonable assurance to the senior management.

In the first line of defence, units are responsible for the management of their own risks by using corporate risk management tools designed by Borsa İstanbul's risk management function which stands in the second line of defence. Units are also responsible for designing a strong control environment. In this framework, as part of Borsa İstanbul's risk management procedures, the first line of defence comprises the following characteristics and control activities in order to manage, mitigate and/or avoid operational risks:

- Borsa İstanbul's Markets, services and applications run on an integrated, highly available and site resilient system. System is designed to be application and hardware redundant and site failover capable with no data loss.
- Roles and responsibilities of operation, application management and development teams are strictly defined. Only authorized employees can access production systems on a need-to-know basis and the access logs are recorded and reviewed accordingly.
- Newly developed applications which have external user interaction are subject to mandatory penetration tests before deployment into production.
- All software developments are subject to user acceptance tests and preplanned release management processes.
- In case production data are needed in test environments, customer sensitive data are obscured by database teams beforehand.
- Only confirmed data and/or data from secure sources are input into ICS. Alerts and alarms regarding data sufficiency, hierarchy of data or other potential problems such as unexpected price changes of index constituents and unchanged index values within a specific period, are produced in ICS and e-mailed to related users by the system.
- Four-Eyes Principle is applied if any human intervention is needed through the process.

In the second line of defense, "Risk Management and Internal Control Directorate" carries out risk assessments for the activities carried out by process owners at the primary level and carries out effectiveness, adequacy, and compliance tests on primary level controls.

In the third line of defense, the "Audit and Surveillance Board", reports to the "Audit Committee" which is an organ of the Borsa İstanbul Board of Directors and consisting of members of the Board of Directors, performs an independent and objective audit activity to evaluate and improve the effectiveness and efficiency of Borsa İstanbul's risk management, control and governance processes and to help Borsa İstanbul achieve its objectives, and shares the improvement suggestions regarding the deficiencies/weaknesses identified with the process owners.

Borsa İstanbul holds [ISO 20000](#) Information Technology Services Management System certification to ensure the quality and reliability of its services; [ISO 22301](#) Business Continuity Management System certification to ensure the uninterrupted continuation of its operation; [ISO 27001](#) Information Security Management System certification for the protection of information assets; and [ISO 27701](#) Privacy Information Management System certification to ensure personal data security.

Borsa İstanbul has a dedicated human resource policy in place that addresses employee recruitment, (orientation, performance evaluation, training and succession planning. Borsa İstanbul business unit managers are responsible for the supervision and training of their employees and for adequate succession planning for all key employees, with the clear focus of ensuring proper business continuity. Besides external and internal technical training based on an individual training plan that is reviewed on an annual basis, Borsa İstanbul employees are subject to mandatory trainings on ethics, prevention of conflicts of interest, information security and confidentiality. A standardized and comprehensive individual performance assessment for all employees takes place on an annual basis. Performance assessments comprise of the expertise and competence levels of the employees involved in Benchmark determination processes.

Borsa İstanbul does not apply Expert Judgment in the determination of Financial Benchmarks, nor does it use Submissions. The Financial Benchmarks administered by Borsa İstanbul are entirely transaction-based and rely exclusively on fully observable data derived from transactions executed in Borsa İstanbul markets. Accordingly, the use of Expert Judgment, the implementation of a Code of Conduct for Submitters, and related governance arrangements are not applicable to the Financial Benchmarks administered by Borsa İstanbul.

Principle 5: Internal Oversight

IOSCO Principle 5

Administrators should establish an oversight function to review and provide challenge on all aspects of the Benchmark determination process. This should include consideration of the features and intended, expected or known usage of the Benchmark and the materiality of existing or potential conflicts of interest identified.

The oversight function should be carried out either by a separate committee, or other appropriate governance arrangements. The oversight function and its composition should be appropriate to provide effective scrutiny of the Administrator. Such oversight function could consider groups of Benchmarks by type or asset class, provided that

it otherwise complies with this Principle.

An Administrator should develop and maintain robust procedures regarding its oversight function, which should be documented and available to relevant Regulatory Authorities, if any. The main features of the procedures should be Made Available to Stakeholders. These procedures should include:

- a) The terms of reference of the oversight function;
- b) Criteria to select members of the oversight function;
- c) The summary details of membership of any committee or arrangement charged with the oversight function, along with any declarations of conflicts of interest and processes for election, nomination or removal and replacement of committee members.

The responsibilities of the oversight function include:

- a) Oversight of the Benchmark design:
 - i. Periodic review of the definition of the Benchmark and its Methodology;
 - ii. Taking measures to remain informed about issues and risks to the Benchmark, as well as commissioning external reviews of the Benchmark (as appropriate);
 - iii. Overseeing any changes to the Benchmark Methodology, including assessing whether the Methodology continues to appropriately measure the underlying Interest, reviewing proposed and implemented changes to the Methodology, and authorizing or requesting the Administrator to undertake a consultation with Stakeholders where known or its Subscribers on such changes as per Principle 12; and
 - iv. Reviewing and approving procedures for termination of the Benchmark, including guidelines that set out how the Administrator should consult with Stakeholders about such cessation.
- b) Oversight of the integrity of Benchmark determination and control framework:
 - i. Overseeing the management and operation of the Benchmark, including activities related to Benchmark determination undertaken by a third party;
 - ii. Considering the results of internal and external audits, and following up on the implementation of remedial actions highlighted in the results of these audits; and
 - iii. Overseeing any exercise of Expert Judgment by the Administrator and ensuring Published Methodologies have been followed.

Where conflicts of interests may arise in the Administrator due to its ownership structures or controlling interests, or due to other activities conducted by any entity owning or controlling the Administrator or by the Administrator or any of its affiliates: the Administrator should establish an independent oversight function which includes a balanced representation of a range of Stakeholders where known, Subscribers and Submitters, which is chosen to counterbalance the relevant conflict of interest.

Where a Benchmark is based on Submissions: the oversight function should provide suitable oversight and challenge of the Submissions by:

- a) Overseeing and challenging the scrutiny and monitoring of inputs or Submissions by the Administrator. This could include regular discussions of inputs or Submission patterns, defining parameters against which inputs or Submissions can be analyzed, or querying the role of the Administrator in challenging or sampling unusual inputs or Submissions;
- b) Overseeing the Code of Conduct for Submitters;
- c) Establishing effective arrangements to address breaches of the Code of Conduct for Submitters; and
- d) Establishing measures to detect potential anomalous or suspicious Submissions and in case of suspicious activities, to report them, as well as any misconduct by Submitters of which it becomes aware to.

Borsa İstanbul's Response

Borsa İstanbul has an appropriate governance structure that oversees all stages of the Financial Benchmark administration process. Within this structure, "Decision-making Body" is mainly responsible for the oversight of the Benchmark determination process. The Committee provides "Decision-making Body" with its evaluations and proposals regarding the oversight of the Financial Benchmarks and "Decision-making Body" takes the decisions.

Duties, responsibilities and the membership structure of The Committee are stated in Article 5 of The Management Procedure.

Since the Financial Benchmarks managed by Borsa İstanbul are based on transaction-based and observable data, the provisions of the IOSCO Principles relating to Non-Exchange Data are not applied by Borsa İstanbul.

B. QUALITY OF THE BENCHMARK

Principle 6: Benchmark Design

IOSCO Principle 6

The design of the Benchmark should seek to achieve, and result in an accurate and reliable representation of the economic realities of the Interest, it seeks to measure, and eliminate factors that might result in a distortion of the price, rate, index or value of the Benchmark.

Benchmark design should take into account the following generic non-exclusive features, and other factors should be considered, as appropriate to the particular Interest:

- a) Adequacy of the sample used to represent the Interest;
- b) Size and liquidity of the relevant market (for example whether there is sufficient trading to provide observable, transparent pricing);
- c) Relative size of the underlying market in relation to the volume of trading in the market that references the Benchmark;
- d) The distribution of trading among Market Participants (market concentration); and
- e) Market dynamics (e.g., to ensure that the Benchmark reflects changes to the assets underpinning a Benchmark).

Borsa İstanbul's Response

While designing Financial Benchmarks, Borsa İstanbul aims to reflect the economic realities of the changes it aims to measure accurately and reliably. To achieve this goal, it eliminates the factors that may cause deterioration in the value of Financial Benchmark.

Borsa İstanbul considers the following in the design of the Financial Benchmarks, as appropriate:

- a) Use of appropriate and sufficient samples for the change that is aimed to be measured,
- b) Size and liquidity of the relevant market, efficiency of the market that references the Financial Benchmark,
- c) Comparison of the sizes of the market transactions, which are the basis for the calculation of the Financial Benchmark, and the transactions in the underlying market,
- d) The concentration of bids, asks and the trades, where appropriate, among market participants,
- e) Driving forces of the market.

The designs of the Financial Benchmarks and their determination processes are described in respective Benchmark Methodologies.

Principle 7: Data Sufficiency

IOSCO Principle 7

The data used to construct a Benchmark determination should be sufficient to accurately and reliably represent the Interest measured by the Benchmark and should:

- a) Be based on prices, rates, indices or values that have been formed by the competitive forces of supply and demand in order to provide confidence that the price discovery system is reliable; and
- b) Be anchored by observable transactions entered into at arm's length between buyers and sellers in the market for the Interest the Benchmark measures in order for it to function as a credible indicator of prices, rates, indices or values.

This Principle requires that a Benchmark be based upon (i.e., *anchored in*) an active market having observable *Bona Fide*, Arms-Length Transactions. This does not mean that every individual Benchmark determination must be constructed solely of transaction data. Provided that an active market exists, conditions in the market on any given day might require the Administrator to rely on different forms of data tied to observable market data as an adjunct or supplement to transactions. Depending upon the Administrator's Methodology, this could result in an individual Benchmark determination being based predominantly, or exclusively, on bids and offers or extrapolations from prior transactions. This is further clarified in Principle 8.

Provided that subparagraphs a.) and b.) above are met, Principle 7 does not preclude Benchmark Administrators from using executable bids or offers as a means to construct Benchmarks where anchored in an observable market consisting of Bona Fide, Arms-Length transactions. This Principle also recognizes that various indices may be

designed to measure or reflect the performance of a rule-based investment strategy, the volatility or behavior of an index or market or other aspects of an active market. Principle 7 does not preclude the use of non-transactional data for such indices that are not designed to represent transactions and where the nature of the index is such that non-transactional data is used to reflect what the index is designed to measure. For example, certain volatility indices, which are designed to measure the expected volatility of an index of securities transactions, rely on non-transactional data, but the data is derived from and thus “anchored” in an actual functioning securities or options market.

Borsa İstanbul’s Response”

To ensure that the economic or financial changes they aim to measure are accurate, reliable and representative, Borsa İstanbul uses data of sufficient quality and scope in the calculation of the indices it manages.

For each Financial Benchmark data sufficiency provisions are stated in respective Benchmark Methodologies.

The data used by Borsa İstanbul are observable prices, rates, indices or values and transactions between buyers and sellers that reflect market conditions.

Inputs are considered sufficient to produce the Financial Benchmark unless the conditions for the contingency arrangement are fulfilled. In that event, a pre-determined contingency procedure will be automatically triggered. Accordingly, pre-determined contingency procedures are stated in respective Benchmark Methodologies

Principle 8: Hierarchy of Data Inputs

IOSCO Principle 8

An Administrator should establish and Publish or Make Available clear guidelines regarding the hierarchy of data inputs and exercise of Expert Judgment used for the determination of Benchmarks. In general, the hierarchy of data inputs should include:

- a) Where a Benchmark is dependent upon Submissions, the Submitters’ own concluded arms-length transactions in the underlying interest or related markets;
- b) Reported or observed concluded Arm’s-length Transactions in the underlying interest;
- c) Reported or observed concluded Arm’s-length Transactions in related markets;
- d) Firm (executable) bids and offers; and
- e) Other market information or Expert Judgments.

Provided that the Data Sufficiency Principle is met (i.e., an active market exists), this Principle is not intended to restrict an Administrator’s flexibility to use inputs consistent with the Administrator’s approach to ensuring the quality, integrity, continuity and reliability of its Benchmark determinations, as set out in the Administrator’s Methodology. The Administrator should retain flexibility to use the inputs it believes are appropriate under its Methodology to ensure the quality and integrity of its Benchmark. For example, certain Administrators may decide to rely upon Expert Judgment in an active albeit low liquidity market, when transactions may not be consistently available each day. IOSCO also recognizes that there might be circumstances (e.g., a low liquidity market) when a confirmed bid or offer might carry more meaning than an outlier transaction. Under these circumstances, non-transactional data such as bids and offers and extrapolations from prior transactions might predominate in a given Benchmark determination.

Borsa İstanbul’s Response

Borsa İstanbul provides the relevant details including calculation methods, committees and the data hierarchy, as outlined in the respective Benchmark Methodologies for the Financial Benchmarks. Benchmark Methodologies are publicly available on Borsa İstanbul official website.

Data hierarchy is included in the following sections of Methodologies:

- a) “Data Used in Calculations and Data Hierarchy” for BIST Stock Indices.
- b) “Prices Used in Index Calculations and Data Hierarchy” for BIST-KYD Indices,
- c) “Prices Used in Index Calculations and Data Hierarchy” for BIST Sustainability Themed Debt Securities Indices,
- d) “Prices Used in Index Calculations and Data Hierarchy” for BIST Commodity and Commodity Denominated Securities Indices,
- e) “Prices Used in Index Calculations and Data Hierarchy” of the underlying indices for BIST Risk Control Indices and BIST Leveraged and Short Indices,

- f) “Insufficiency of Input Data” for TLREF Turkish Lira Overnight Reference Rate and BIST TLREF Index.

Borsa İstanbul does not apply Expert Judgment in the determination of Financial Benchmarks, nor does it use Submissions. The Financial Benchmarks administered by Borsa İstanbul are entirely transaction-based and rely exclusively on fully observable data derived from transactions executed in Borsa İstanbul markets. Accordingly, the use of Expert Judgment, the implementation of a Code of Conduct for Submitters, and related governance arrangements are not applicable to the Financial Benchmarks administered by Borsa İstanbul.

Principle 9: Transparency of Benchmark Determinations

IOSCO Principle 9

The Administrator should describe and publish with each Benchmark determination, to the extent reasonable without delaying an Administrator publication deadline:

- a) A concise explanation, sufficient to facilitate a Stakeholder’s or Market Authority’s ability to understand how the determination was developed, including, at a minimum, the size and liquidity of the market being assessed (meaning the number and volume of transactions submitted), the range and average volume and range and average of price, and indicative percentages of each type of market data that have been considered in a Benchmark determination; terms referring to the pricing Methodology should be included (i.e., transaction-based, spread-based or interpolated/extrapolated);
- b) A concise explanation of the extent to which and the basis upon which Expert Judgment if any, was used in establishing a Benchmark determination.

Borsa İstanbul’s Response

Borsa İstanbul is a regulated market of Türkiye, is subject to regulation by the CMB and has mandatory post-trade transparency requirements. It is also listed by ESMA as a Third Country Trading Venue that meets the post-trade transparency requirements under MiFID II and MiFIR.

Only publicly available information is used in Financial Benchmark determination processes. Financial Benchmarks administered by Borsa İstanbul are typically derived from data sourced from its own markets. For each Financial Benchmark, the relevant details including data inputs, selection criteria, formula, calculation and dissemination intervals and announcement dates are stated in respective Benchmark Methodologies which are based on objective rules and publicly available on Borsa İstanbul official website. Benchmark Methodology changes are announced and the data used in Financial Benchmark determination processes are disseminated transparently.

Borsa İstanbul does not apply Expert Judgment in the determination of Financial Benchmarks, nor does it use Submissions. The Financial Benchmarks administered by Borsa İstanbul are entirely transaction-based and rely exclusively on fully observable data derived from transactions executed in Borsa İstanbul markets. Accordingly, the use of Expert Judgment, the implementation of a Code of Conduct for Submitters, and related governance arrangements are not applicable to the Financial Benchmarks administered by Borsa İstanbul.

Principle 10: Periodic Review

IOSCO Principle 10

The Administrator should periodically review the conditions in the underlying Interest that the Benchmark measures to determine whether the Interest has undergone structural changes that might require changes to the design of the Methodology. The Administrator also should periodically review whether the Interest has diminished or is non-functioning such that it can no longer function as the basis for a credible Benchmark.

The Administrator should Publish or Make Available a summary of such reviews where material revisions have been made to a Benchmark, including the rationale for the revisions.

Borsa İstanbul’s Response

The Committee conducts general reviews on a periodic and ad-hoc basis to determine whether the underlying interest that the Financial Benchmark measures has undergone a structural change and presents its opinions to the “Decision-making Body”.

In addition to periodic and non-periodic reviews, external revision requests are also taken into account in the process of determining whether there is a need for revision in the Financial Benchmarks and Benchmark Methodologies.

As a result of these activities, all changes that are decided to be made in the Financial Benchmarks and Benchmark Methodologies are published on Borsa İstanbul official website before they are being implemented. A summary of such reviews where material changes have been made to a Benchmark Methodology is made publicly available on

the “[Methodologies and Changes](#)” section of the Borsa İstanbul website.

C. QUALITY OF THE METHODOLOGY

Principle 11: Content of Methodology

IOSCO Principle 11

The Administrator should document and Publish or Make Available the Methodology used to make Benchmark determinations. The Administrator should provide the rationale for adopting a particular Methodology. The Published Methodology should provide sufficient detail to allow Stakeholders to understand how the Benchmark is derived and to assess its representativeness, its relevance to particular Stakeholders, and its appropriateness as a reference for financial instruments. At a minimum, the Methodology should contain:

- a) Definitions of key terms;
- b) All criteria and procedures used to develop the Benchmark, including input selection, the mix of inputs used to derive the Benchmark, the guidelines that control the exercise of Expert Judgment by the Administrator, priority given to certain data types, minimum data needed to determine a Benchmark, and any models or extrapolation methods;
- c) Procedures and practices designed to promote consistency in the exercise of Expert Judgment between Benchmark determinations;
- d) The procedures which govern Benchmark determination in periods of market stress or disruption, or periods where data sources may be absent (e.g., theoretical estimation models);
- e) The procedures for dealing with error reports, including when a revision of a Benchmark would be applicable;
- f) Information regarding the frequency for internal reviews and approvals of the Methodology. Where applicable, the Published Methodologies should also include information regarding the procedures and frequency for external review of the Methodology;
- g) The circumstances and procedures under which the Administrator will consult with Stakeholders, as appropriate; and
- h) The identification of potential limitations of a Benchmark, including its operation in illiquid or fragmented markets and the possible concentration of inputs.

Where a Benchmark is based on Submissions, the additional Principle also applies:

The Administrator should clearly establish criteria for including and excluding Submitters. The criteria should consider any issues arising from the location of the Submitter, if in a different jurisdiction to the Administrator. These criteria should be available to any relevant Regulatory Authorities, if any, and Published or Made Available to Stakeholders. Any provisions related to changes in composition, including notice periods should be made clear.

Borsa İstanbul's Response

Benchmark Methodologies detail the determination process of each Financial Benchmark and provide sufficient information (including the rationale for the method it chooses) for Stakeholders to understand how the Financial Benchmark is constructed, maintained and whether it is suitable to use as a reference in financial products.

Created by Borsa İstanbul, Benchmark Methodologies are designed to limit subjectivity and contain at least the following information;

- a) Definition of the key terms frequently used in the Benchmark Methodologies,
- b) All criteria and procedures for determining the Financial Benchmark, such as the data inputs used in calculating the Financial Benchmark, the selection of the data inputs, application of expert judgement (if any), the priorities given to certain data types, the minimum data needed to determine a Financial Benchmark and any models or extrapolation methods used (if any),
- c) The hierarchy of data used to determine Financial Benchmarks, and the procedures for determining the Financial Benchmark in the absence of data or unusual market conditions,
- d) Procedures for eliminating potential errors, including situations that would require recalculation of a Financial Benchmark,
- e) Information on the approval and periodic review of the Benchmark Methodology

Borsa İstanbul does not apply Expert Judgment in the determination of Financial Benchmarks, nor does it use Submissions. The Financial Benchmarks administered by Borsa İstanbul are entirely transaction-based and rely

exclusively on fully observable data derived from transactions executed in Borsa İstanbul markets. Accordingly, the use of Expert Judgment, the implementation of a Code of Conduct for Submitters, and related governance arrangements are not applicable to the Financial Benchmarks administered by Borsa İstanbul.

Principle 12: Changes to Methodology

IOSCO Principle 12

An Administrator should Publish or Make Available the rationale of any proposed material changes in its Methodology, and procedures for making such changes. These procedures should clearly define what constitutes a material change, and the method and timing for consulting or notifying Subscribers (and other Stakeholders where appropriate, taking into account the breadth and depth of the Benchmark's use) of changes. Those procedures should be consistent with the overriding objective that an Administrator must ensure the continued integrity of its Benchmark determinations. When changes are proposed, the Administrator should specify exactly what these changes entail and when they are intended to apply.

The Administrator should specify how changes to the Methodology will be scrutinized, by the oversight function.

The Administrator should develop Stakeholder consultation procedures in relation to changes to the Methodology that are deemed material by the oversight function, and that are appropriate and proportionate to the breadth and depth of the Benchmark's use and the nature of the Stakeholders. Procedures should:

- a) Provide advance notice and a clear timeframe that gives Stakeholders sufficient opportunity to analyze and comment on the impact of such proposed material changes, having regard to the Administrator's assessment of the overall circumstances; and
- b) Provide for Stakeholders' summary comments, and the Administrator's summary response to those comments, to be made accessible to all Stakeholders after any given consultation period, except where the commenter has requested confidentiality.

Borsa İstanbul's Response

Needs for revision in the Benchmark Methodologies may arise as a result of change requests from Subscribers or Stakeholders and periodic or non-periodic reviews within the scope of the oversight of the Financial Benchmarks.

Borsa İstanbul has implemented a governance and oversight structure with committees and policies to review Benchmark Methodologies and conduct consultations with Stakeholders as needed.

All changes that are decided to be made in the Benchmark Methodologies are made publicly available ("[Methodologies and Changes](#)" section) on Borsa İstanbul official website, accompanied by the relevant explanations and rationale for the revision, before being implemented.

The Committee evaluates the needs for revision and submits its evaluation to the "Decision-making Body" for a decision, including its opinion on whether the change is material or not. Prior to the implementation of a material change, a consultation with the Stakeholders takes place in accordance with the provisions outlined in Article 7 of The Management Procedure. Borsa İstanbul makes the Benchmark Methodology changes publicly available on the official website and notify Subscribers via e-mail which sets out the reasons and procedures for making material changes to the Benchmark Methodologies.

Borsa İstanbul has established a survey substructure on the website where Subscribers and Stakeholders can comment on Benchmark Methodology changes. The consultation period would depend on the urgency and nature of the change but would be notified in advance to Subscribers and Stakeholders. A summary of the comments, except where the commentator has requested confidentiality, and Borsa İstanbul's summary response to those comments are made publicly available on the website after any given consultation period.

Principle 13: Transition

IOSCO Principle 13

Administrators should have clear written policies and procedures, to address the need for possible cessation of a Benchmark, due to market structure change, product definition change, or any other condition which makes the Benchmark no longer representative of its intended Interest. These policies and procedures should be proportionate to the estimated breadth and depth of contracts and financial instruments that reference a Benchmark and the economic and financial stability impact that might result from the cessation of the Benchmark. The Administrator should take into account the views of Stakeholders and any relevant Regulatory and National Authorities in determining what policies and procedures are appropriate for a particular Benchmark.

These written policies and procedures should be Published or Made Available to all Stakeholders. Administrators should encourage Subscribers and other Stakeholders who have financial instruments that reference a Benchmark to take steps to make sure that:

- a) Contracts or other financial instruments that reference a Benchmark, have robust fallback provisions in the event of material changes to, or cessation of, the referenced Benchmark; and
- b) Stakeholders are aware of the possibility that various factors, including external factors beyond the control of the Administrator, might necessitate material changes to a Benchmark.

Administrators' written policies and procedures to address the possibility of Benchmark cessation could include the following factors, if determined to be reasonable and appropriate by the Administrator:

- a) Criteria to guide the selection of a credible, alternative Benchmark such as, but not limited to, criteria that seek to match to the extent practicable the existing Benchmark's characteristics (e.g., credit quality, maturities and liquidity of the alternative market), differentials between Benchmarks, the extent to which an alternative Benchmark meets the asset/liability needs of Stakeholders, whether the revised Benchmark is investable, the availability of transparent transaction data, the impact on Stakeholders and impact of existing legislation.
- b) The practicality of maintaining parallel Benchmarks (e.g., where feasible, maintain the existing Benchmark for a defined period of time to permit existing contracts and financial instruments to mature and publish a new Benchmark) in order to accommodate an orderly transition to a new Benchmark;
- c) The procedures that the Administrator would follow in the event that a suitable alternative cannot be identified;
- d) In the case of a Benchmark or a tenor of a Benchmark that will be discontinued completely, the policy defining the period of time in which the Benchmark will continue to be produced in order to permit existing contracts to migrate to an alternative Benchmark if necessary; and
- e) The process by which the Administrator will engage Stakeholders and relevant Market and National Authorities, as appropriate, in the process for selecting and moving towards an alternative Benchmark, including the timeframe for any such action commensurate with the tenors of the financial instruments referencing the Benchmarks and the adequacy of notice that will be provided to Stakeholders.

Borsa İstanbul's Response

Borsa İstanbul has clear written policies and procedures on the possible cessation of Financial Benchmarks. Principles regarding transitions and cessations are regulated in Article 8 of The Management Procedure.

In general, The Committee can identify the need for cessation of a Financial Benchmark and submit a proposal to "Decision-making Body" for a decision. While preparing this proposal The Committee, identify the effects of the cessations of a Benchmark to economic and financial stability, the breadth and depth of contracts and financial instruments that reference a Financial Benchmark and the views of Stakeholders and the Regulatory and National Authorities. This proposal also includes giving detailed information about the nature and rationale of the cessation and transition as well as the date on which the Financial Benchmark is to be ceased.

When a Financial Benchmark is ceased without launching a new one, Borsa İstanbul considers whether to recommend an alternative credible Financial Benchmark.

Borsa İstanbul informs that Licensees' and Stakeholders' to be informed that the calculation of a Financial Benchmark may be discontinued and that the rules applicable to a Financial Benchmark may be materially amended. Borsa İstanbul further requires such users include in their contracts or other financial instruments referencing the relevant Financial Benchmark appropriate transition or termination provisions to be applied in the event of a material change to, or the cessation of the Financial Benchmark.

Principle 14: Submitter Code of Conduct

IOSCO Principle 14

Where a Benchmark is based on Submissions, the following additional Principle also applies:

The Administrator should develop guidelines for Submitters ("Submitter Code of Conduct"), which should be available to any relevant Regulatory Authorities, if any and Published or Made Available to Stakeholders.

The Administrator should only use inputs or Submissions from entities which adhere to the Submitter Code of Conduct and the Administrator should appropriately monitor and record adherence from Submitters. The Administrator should require Submitters to confirm adherence to the Submitter Code of Conduct annually and whenever a change to the Submitter Code of Conduct has occurred.

The Administrator's oversight function should be responsible for the continuing review and oversight of the Submitter Code of Conduct.

The Submitter Code of Conduct should address:

- a) The selection of inputs;
- b) Who may submit data and information to the Administrator;
- c) Quality control procedures to verify the identity of a Submitter and any employee(s) of a Submitter who report(s) data or information and the authorization of such person(s) to report market data on behalf of a Submitter;
- d) Criteria applied to employees of a Submitter who are permitted to submit data or information to an Administrator on behalf of a Submitter;
- e) Policies to discourage the interim withdrawal of Submitters from surveys or Panels;
- f) Policies to encourage Submitters to submit all relevant data; and
- g) The Submitters' internal systems and controls, which should include:
 - i. Procedures for submitting inputs, including Methodologies to determine the type of eligible inputs, in line with the Administrator's Methodologies;
 - ii. Procedures to detect and evaluate suspicious inputs or transactions, including inter-group transactions, and to ensure the Bona Fide nature of such inputs, where appropriate;
 - iii. Policies guiding and detailing the use of Expert Judgment, including documentation requirements;
 - iv. Record keeping policies;
 - v. Pre-Submission validation of inputs, and procedures for multiple reviews by senior staff to check inputs;
 - vi. Training, including training with respect to any relevant regulation (covering Benchmark regulation or any market abuse regime);
 - vii. Suspicious Submission reporting;
 - viii. Roles and responsibilities of key personnel and accountability lines;
 - ix. Internal sign off procedures by management for submitting inputs;
 - x. Whistle blowing policies (in line with Principle 4); and
 - xi. Conflicts of interest procedures and policies, including prohibitions on the Submission of data from Front Office Functions unless the Administrator is satisfied that there are adequate internal oversight and verification procedures for Front Office Function Submissions of data to an Administrator (including safeguards and supervision to address possible conflicts of interests as per paragraphs (v) and (ix) above), the physical separation of employees and reporting lines where appropriate, the consideration of how to identify, disclose, manage, mitigate and avoid existing or potential incentives to manipulate or otherwise influence data inputs (whether or not in order to influence the Benchmark levels), including, without limitation, through appropriate remuneration policies and by effectively addressing conflicts of interest which may exist between the Submitter's Submission activities (including all staff who perform or otherwise participate in Benchmark Submission responsibilities), and any other business of the Submitter or of any of its affiliates or any of their respective clients or customers.

Borsa İstanbul's Response

Borsa İstanbul does not apply Expert Judgment in the determination of Financial Benchmarks, nor does it use Submissions. The Financial Benchmarks administered by Borsa İstanbul are entirely transaction-based and rely exclusively on fully observable data derived from transactions executed in Borsa İstanbul markets. Accordingly, the use of Expert Judgment, the implementation of a Code of Conduct for Submitters, and related governance arrangements are not applicable to the Financial Benchmarks administered by Borsa İstanbul.

Principle 15: Internal Controls over Data Collection

IOSCO Principle 16

When an Administrator collects data from any external source the Administrator should ensure that there are appropriate internal controls over its data collection and transmission processes. These controls should address the process for selecting the source, collecting the data and protecting the integrity and confidentiality of the data. Where Administrators receive data from employees of the Front Office Function, the Administrator should seek corroborating data from other sources.

Borsa İstanbul's Response

In cases where Borsa İstanbul obtains data from external sources, it establishes appropriate internal control systems for data collection and transmission processes. These controls cover the selection of the external source from which the data is obtained, how the data is obtained, and how the integrity and confidentiality of the data is protected.

Borsa İstanbul does not obtain any data from any Front Office Function.

The data inputs used in the determination of Financial Benchmarks are;

- Based on transactions executed in Borsa İstanbul Markets,
- Provided by data vendors such as Bloomberg and LSEG, where the data are widely used by financial institutions and market professionals as a market standard and/or
- Provided by state owned institutions authorized by law to make the related data available to the public such as MKK, CBRT and HMB.

For each Financial Benchmark the data inputs used in the determination are stated in respective Benchmark Methodologies.

As part of Borsa İstanbul's internal data input control procedures;

- All data are automatically input to the ICS and confirmed with another data source as available, and/or double checked by index specialists. Four-Eyes Principle is applied if any human intervention is needed in the process.
- Alerts and alarms regarding data sufficiency, hierarchy of data and other potential problems such as unexpected price changes of index constituents and unchanged index values within a specific period, are generated and e-mailed to related users by the ICS.

D. ACCOUNTABILITY

Principle 16: Complaints Procedures

IOSCO Principle 16

The Administrator should establish and Publish or Make Available a written complaints procedures policy, by which Stakeholders may submit complaints including concerning whether a specific Benchmark determination is representative of the underlying Interest it seeks to measure, applications of the Methodology in relation to a specific Benchmark determination(s) and other Administrator decisions in relation to a Benchmark determination.

The complaints procedures policy should:

- a) Permit complaints to be submitted through a user-friendly complaints process such as an electronic Submission process;
- b) Contain procedures for receiving and investigating a complaint made about the Administrator's Benchmark determination process on a timely and fair basis by personnel who are independent of any personnel who may be or may have been involved in the subject of the complaint, advising the complainant and other relevant parties of the outcome of its investigation within a reasonable period and retaining all records concerning complaints;
- c) Contain a process for escalating complaints, as appropriate, to the Administrator's governance body; and
- d) Require all documents relating to a complaint, including those submitted by the complainant as well as the Administrator's own record, to be retained for a minimum of five years, subject to applicable national legal or regulatory requirements.

Disputes about a Benchmarking determination, which are not formal complaints, should be resolved by the Administrator by reference to its standard appropriate procedures. If a complaint results in a change in a Benchmark determination, that should be Published or Made Available to Subscribers and Published or Made Available to Stakeholders as soon as possible as set out in the Methodology.

Borsa İstanbul's Response

Borsa İstanbul has implemented a dedicated complaints policy and The Complaint Procedure allows Stakeholders to submit their complaints in a user-friendly manner via [Contact Form](#) on the Borsa İstanbul official website or by email.

All complaints are duly investigated by an employee not involved in the determination of the relevant Financial Benchmark and a response is given to the complainant within a reasonable time.

Principle 17: Audits

IOSCO Principle 17

The Administrator should appoint an independent internal or external auditor with appropriate experience and capability to periodically review and report on the Administrator's adherence to its stated criteria and with the Principles. The frequency of audits should be proportionate to the size and complexity of the Administrator's operations.

Where appropriate to the level of existing or potential conflicts of interest identified by the Administrator (except for Benchmarks that are otherwise regulated or supervised by a National Authority other than a relevant Regulatory Authority), an Administrator should appoint an independent external auditor with appropriate experience and capability to periodically review and report on the Administrator's adherence to its stated Methodology. The frequency of audits should be proportionate to the size and complexity of the Administrator's Benchmark operations and the breadth and depth of Benchmark use by Stakeholders.

Borsa İstanbul's Response

"Audit and Surveillance Board" of Borsa İstanbul reviews the Financial Benchmark determination processes and the compliance of said processes with the Benchmark Methodologies as well as The Directive and reports the results to the "Audit Committee".

Principle 18: Audit Trail

IOSCO Principle 18

Written records should be retained by the Administrator for five years, subject to applicable national legal or regulatory requirements on:

- a) All market data, Submissions and any other data and information sources relied upon for Benchmark determination;
- b) The exercise of Expert Judgment made by the Administrator in reaching a Benchmark determination;
- c) Other changes in or deviations from standard procedures and Methodologies, including those made during periods of market stress or disruption;
- d) The identity of each person involved in producing a Benchmark determination; and
- e) Any queries and responses relating to data inputs.

If these records are held by a Regulated Market or Exchange the Administrator may rely on these records for compliance with this Principle, subject to appropriate written record sharing agreements.

When a Benchmark is based on Submissions, the following additional Principle also applies:

Submitters should retain records for five years subject to applicable national legal or regulatory requirements on:

- a) The procedures and Methodologies governing the Submission of inputs;
- b) The identity of any other person who submitted or otherwise generated any of the data or information provided to the Administrator;
- c) Names and roles of individuals responsible for Submission and Submission oversight;
- d) Relevant communications between submitting parties;
- e) Any interaction with the Administrator;
- f) Any queries received regarding data or information provided to the Administrator;
- g) Declaration of any conflicts of interests and aggregate exposures to Benchmark related instruments;
- h) Exposures of individual traders/desks to Benchmark related instruments in order to facilitate audits and investigations; and
- i) Findings of external/internal audits, when available, related to Benchmark Submission remedial actions and progress in implementing them.

Borsa İstanbul's Response

Borsa İstanbul keeps all the records of the Financial Benchmark calculation processes.

Besides these records, Borsa İstanbul keeps the following data for at least 5 years, without prejudice to legal and administrative requirements; upon request, it shares with the CMB:

- a) All market data which are taken as inputs in the determination processes of Financial Benchmarks,
- b) Changes and deviations from the standard procedures and Methodologies for determining Financial Benchmarks, including those which are made during periods of market stress or disruption,
- c) Information about employees participating in the determination processes of Financial Benchmarks,
- d) All queries and responses regarding the data used in the calculation of Financial Benchmark.

Borsa İstanbul does not apply Expert Judgment in the determination of Financial Benchmarks, nor does it use Submissions. The Financial Benchmarks administered by Borsa İstanbul are entirely transaction-based and rely exclusively on fully observable data derived from transactions executed in Borsa İstanbul markets. Accordingly, the use of Expert Judgment, the implementation of a Code of Conduct for Submitters, and related governance arrangements are not applicable to the Financial Benchmarks administered by Borsa İstanbul.

Principle 19: Cooperation with Regulatory Authorities

IOSCO Principle 19

Relevant documents, Audit Trails and other documents subject to these Principles shall be made readily available by the relevant parties to the relevant Regulatory Authorities in carrying out their regulatory or supervisory duties and handed over promptly upon request.

Borsa İstanbul's Response

Borsa İstanbul is a regulated market of Türkiye and is subject to regulation by the CMB.

Upon request, Borsa İstanbul provides access to any information required by CMB and other Regulatory Authorities in carrying out their regulatory or supervisory duties.

4. Financial Benchmarks Compliant with IOSCO Principles

The Financial Benchmarks administrated by Borsa İstanbul listed below are compliant with IOSCO Principles as of the date of this statement. US Dollar and Euro versions (if calculated) of all TL denominated indices listed below are also compliant with the IOSCO Principles.

BIST Stock Indices (*)

Code	Name in Turkish	Name in English
XU030	BIST 30	BIST 30
XU050	BIST 50	BIST 50
XU100	BIST 100	BIST 100
XU500	BIST 500	BIST 500
XLBNK	BIST LİKİT BANKA	BIST LIQUID BANKS
X10XB	BIST BANKA DISİ LİKİT 10	BIST LIQUID 10 EX BANKS
XUTUM	BIST TUM	BIST ALL SHARES
X030EA	BIST 30 ESİT AĞIRLIKLİ GETİRİ	BIST 30 EQUAL WEIGHTED RETURN
XELOT	BIST 50-30	BIST 50-30
XYUZO	BIST 100-30	BIST 100-30
XTUMY	BIST TUM-100	BIST ALL SHARES-100
XYLDZ	BIST YILDIZ	BIST STARS
XBANA	BIST ANA	BIST MAIN
XHARZ	BIST HALKA ARZ	BIST IPO
XKOBI	BIST KOBI SANAYİ	BIST SME INDUSTRIAL
XTMTU	BIST TEMETTÜ	BIST DIVIDEND
XTM25	BIST TEMETTÜ 25	BIST DIVIDEND 25
XK030	BIST KATILIM 30	BIST PARTICIPATION 30
XK050	BIST KATILIM 50	BIST PARTICIPATION 50
XK100	BIST KATILIM 100	BIST PARTICIPATION 100
XKTUM	BIST KATILIM TUM	BIST PARTICIPATION ALL SHARES
XK030EA	BIST KATILIM 30 ESİT AĞIRLIKLİ GETİRİ	BIST PARTICIPATION 30 EQUAL WEIGHTED RETURN
XSRDK	BIST KATILIM SÜRDÜRÜLEBİLİRLİK	BIST PARTICIPATION SUSTAINABILITY
XKTMT	BIST KATILIM TEMETTÜ	BIST PARTICIPATION DIVIDEND
XKURY	BIST KURUMSAL YONETİM	BIST CORPORATE GOVERNANCE
XUSRDK	BIST SÜRDÜRÜLEBİLİRLİK	BIST SUSTAINABILITY
XSD25	BIST SÜRDÜRÜLEBİLİRLİK 25	BIST SUSTAINABILITY 25
XUGRA	BIST GERİ ALIM	BIST BUYBACK
XUSIN	BIST SİNAYİ	BIST INDUSTRIALS
XUHIZ	BIST HİZMETLER	BIST SERVICES
XUMAL	BIST MALİ	BIST FINANCIALS
XBANK	BIST BANKA	BIST BANKS
XUTEK	BIST TEKNOLOJİ	BIST TECHNOLOGY

(*): The price and the total return versions of these indices; as well as capped versions are also compliant with the IOSCO Principles.

BIST-KYD Indices

Name of the Index Family in Turkish	Name of the Index Family in English
BIST-KYD DIBS ENDEKSLERİ	BIST-KYD GDS INDICES
BIST-KYD DIBS DEGİSKEN ENDEKSLERİ	BIST-KYD GDS FLOATING RATE INDICES
BIST-KYD TUFE ENDEKSI	BIST-KYD CPI INDEXED GOVERNMENT BOND INDICES
BIST-KYD OSBA ENDEKSLERİ	BIST-KYD CORPORATE BOND INDICES
BIST-KYD KAMU EUROBOND ENDEKSLERİ	BIST-KYD GOVERNMENT EUROBOND INDICES
BIST-KYD OSBA EUROBOND ENDEKSLERİ	BIST-KYD CORPORATE EUROBOND INDICES
BIST-KYD KIRA SERTİFİKALARI ENDEKSLERİ	BIST-KYD LEASE CERTIFICATE INDICES
BIST-KYD REPO ENDEKSLERİ	BIST-KYD REPO INDICES
BIST-KYD ALTIN FİYAT ENDEKSLERİ	BIST-KYD GOLD PRICE INDICES

BIST Sustainability Themed Debt Securities Indices

Name of the Index Family in Turkish	Name of the Index Family in English
BIST YESİL OSBA EUROBOND ENDEKSLERİ	BIST GREEN CORPORATE EUROBOND INDICES
BIST SÜRÜRÜLEBİLİR OSBA EUROBOND ENDEKSLERİ	BIST SUSTAINABLE CORPORATE EUROBOND INDICES

BIST Commodity and Commodity Denominated Securities Indices

Code	Name in Turkish	Name in English
ATKMP	BIST KMP ALTIN	BIST KMP GOLD
ALTSPT	BIST SPOT ALTIN	BIST SPOT GOLD
GMSSPT	BIST SPOT GUMUS	BIST SPOT SILVER
PLTSPT	BIST SPOT PLATIN	BIST SPOT PLATINUM
PLDSPT	BIST SPOT PALADYUM	BIST SPOT PALLADIUM
ALTKST	BIST ALTINA DAYALI KIRA SERTİFİKASI	BIST GOLD DENOMINATED LEASE CERTIFICATE
ALTTHV	BIST ALTIN TAHVİLİ	BIST GOLD BOND

BIST Strategy Indices

Name of the Index Family in Turkish	Name of the Index Family in English
BIST RISK KONTROL ENDEKSLERİ	BIST RISK CONTROL INDICES
BIST KALDIRAÇLI VE KISA ENDEKSLERİ	BIST LEVERAGED AND SHORT INDICES

Reference Rate

Code	Name in Turkish	Name in English
TLREF	TURK LIRASI GECELİK REFERANS FAİZ ORANI	TURKISH LIRA OVERNIGHT REFERENCE RATE
BISTTLREF	BIST TLREF ENDEKSI	BIST TLREF INDEX

Abbreviations

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

Borsa İstanbul Group stands for Borsa İstanbul A.Ş., İstanbul Settlement and Custody Bank and Central Securities Depository.

CBRT stands for the Central Bank of the Republic of Türkiye.

CMB stands for the Capital Markets Board of Türkiye.

CML stands to Capital Markets Law No. 6362.

Committee refers to the Financial Benchmarks Committee, described in Article 5 of Borsa İstanbul A.Ş. Financial Benchmarks Management Procedure.

Control Framework refers to the set of measures implemented to protect the integrity and quality of the calculation processes of Financial Benchmarks within the scope of Article 8 of Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles.

Decision-making Body stands for the authority referred to in Article 4 “Decision-making Body” of Borsa İstanbul A.Ş. Financial Benchmarks Management Procedure, depending on the qualifications of the related Financial Benchmarks.

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

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

Front Office refers to any department, division, group, or personnel of Submitter or any of its affiliates, whether identified as such, that performs, or personnel exercising direct supervisory authority over the performance of, any pricing (excluding price verification for risk management purposes), trading, sales, marketing, advertising, solicitation, structuring, or brokerage activities on behalf of a third party or for proprietary purposes.

HMB stands for the Republic of Türkiye Ministry of Treasury and Finance.

HMVKŞ, stands for the Undersecretariat of Treasury Asset Leasing Company.

ICS stands for the Index Calculation System of Borsa İstanbul.

IOSCO Principles refers to the Principles for Financial Benchmarks published by IOSCO.

Market Authority refers to such institutions as Regulatory Authorities, self-regulatory organizations, organized markets, exchanges or clearing houses.

Methodology refers to the written rules and procedures according to which information is collected and the Financial Benchmark is determined by the Administrator (Borsa İstanbul).

MKK stands for Central Securities Depository & Trade Repository of Türkiye.

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

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

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

Submitter(s) refers to legal entities providing information to Administrator (Borsa İstanbul) required in connection with the determination of a Financial Benchmarks.

Subscriber(s) refers to a person or entity that purchases Financial Benchmark determination services from Administrator (Borsa İstanbul).

The Complaint Procedure refers to the Borsa İstanbul A.Ş. Complaint Procedure for Financial Benchmarks.

The Conflicts of Interest Procedure refers to the Borsa İstanbul A.Ş. Procedure on Prevention of Conflicts of Interest in Financial Benchmarks.

The Directive refers to the Borsa İstanbul A.Ş. Directive on Financial Benchmarks Compliant with IOSCO Principles.

The Management Procedure refers to the Borsa İstanbul A.Ş. Financial Benchmarks Management Procedure.

The Whistleblowing Procedure refers to the Borsa İstanbul A.Ş. Whistleblowing Procedure for Financial Benchmarks.