



Low Volatility Tilt Benchmark Compliance Statement

Foxberry Ltd
1st February, 2018



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Item	Text field
A. General Information	
1. Date of creation of the compliance statement and of the latest update	1. Created: 01/10/2017 Last updated: 25/01/2018
2. Identity of the administrator	2. Foxberry Ltd
<p><i>This section should identify:</i></p> <ul style="list-style-type: none"> • the non-significant benchmark in respect of which provisions do not apply, • the provisions that the administrator has chosen not to apply, and • an explanation as to why it is appropriate not to apply each provision. <p><i>Each section should be completed for any identified group of non-significant benchmarks provided by the administrator in respect of which:</i></p> <ul style="list-style-type: none"> • the same provisions are not complied with, and • the same explanations for non-compliance apply. 	
B. Foxberry Ltd chooses to not apply the following provisions of Regulation (EU) 2016/1011 (the “BMR”) with respect to its non-significant benchmarks listed below	
3. Identification of benchmark(s) for which this section is relevant	<p>3.</p> <ol style="list-style-type: none"> 1. Foxberry Natural Resources Low Volatility Tilt Total Return <ul style="list-style-type: none"> • ISIN: DE000SLA2QV1 2. Foxberry Natural Resources North America Low Volatility Tilt Total Return <ul style="list-style-type: none"> • ISIN: DE000SLA2RG0 3. Foxberry Natural Resources Asia Pacific Low Volatility Tilt Total Return <ul style="list-style-type: none"> • ISIN: DE000SLA2RH8

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Item	Text field
<p>4. (i) clear identification of each single provision; (ii) for each provision listed under point (i), a dedicated, detailed and clear explanation of the reasons why the administrator considers it appropriate not to comply with that specific provision</p>	<p>4(i).</p> <p>Article 4(2) - The provision of a benchmark shall be operationally separated from any part of an administrator's business that may create an actual or potential conflict of interest.</p> <p>Article 11(2)(c) - Administrators shall ensure that their controls in respect of input data include: (a) a process for validating input data, including against other indicators or data, to ensure its integrity and accuracy.</p> <p>Article 14(2) - An administrator shall monitor input data and contributors in order to be able to notify the competent authority and provide all relevant information where the administrator suspects that, in relation to a benchmark, any conduct has taken place that may involve manipulation or attempted manipulation of the benchmark, under Regulation (EU) No 596/2014, including collusion to do so.</p>
	<p>4(ii).</p> <p>Article 4(2) - Foxberry Ltd has a Conflict of Interest Policy in place which outlines restrictions, controls and procedures to manage actual and potential conflict of interest with regards to its benchmark provision activities. Whilst employees part of Foxberry's Management Body may also be involved in our benchmark provision activities, our policies and procedures are in place to ensure good conduct and compliance.</p> <p>Article 11(2)(c) - We have deemed the relevant trading venues to be credible venues in the respective jurisdiction, and the relevant trading venues are typically considered the primary source of trading for the relevant securities.</p> <p>Article 14(2) - The relevant benchmarks allocates either to (i) securities listed on trading venues fulfilling the criteria of point (24)(a)(i) of Article 3(1) of the BMR; or (ii) to trading venues that have not been given equivalence status in accordance with point (24)(a)(i) of Article 3(1) of the BMR, but where we have deemed such trading venues to be credible venues in the relevant jurisdiction.</p>