

Assessment of Austrian Traded Index® - ATX® Compliance with the ESMA-EBA Principles for Benchmark-Setting Processes in the EU¹

In 1991, Wiener Börse AG (“WBAG”) launched the Austrian Traded Index® - ATX® in order to cover the most representative and highly traded Austrian stocks listed in the “prime market” segment of the official market, a regulated market supervised by the Austrian Financial Market Authority. ATX® is calculated only on the basis of exchange traded prices and published in real-time by WBAG on every exchange trading day of WBAG.

Having assessed and updated its governance structure, policies and control framework, WBAG confirms with regard to ATX® that it has already designed and implemented specific activities (the “Relevant Activities”) to adhere to the Principles for Benchmark-Setting Processes in the EU published by ESMA and EBA (“ESMA Principles”). The relevant assessment has been performed in line with the principle of proportionality laid down in the ESMA Principles.

Annex 1² sets out details of the ESMA Principles together with the Relevant Activities in operation. However, since the assessment of compliance is still an ongoing process, WBAG is willing to implement further measures for adherence, where required. This concerns in particular the conflicts of interests referred to in Paragraph B.9 and the whistleblowing mechanism referred to in Paragraph B.14 of the ESMA Principles.

Vienna, December 2014

Wiener Börse AG

¹ This document and its integral Annex give an overview of the assessment of adherence conducted by WBAG. It serves for information purposes only and in no way shall be interpreted or construed to create any obligations or warranties of any kind, either express or implied, regarding the information contained herein.

² The German version of Annex 1 is binding. The English translation serves for information purposes only.

Compliance with ESMA Principles for the ATX – Austrian Traded Index

ESMA-EBA Principles for Benchmark-Setting Processes in the EU im Folgenden „ESMA“.

The German version of this document is binding. The English translation serves for information purposes only.

Principles for Benchmark Administrators

ESMA	ESMA	Comments
General principles	<p>B.1: A Benchmark Administrator should ensure the existence of robust methodologies for the calculation of the Benchmark and appropriately oversee its operations and ensure that there is an appropriate level of transparency to the public regarding the rules governing the Benchmark.</p>	<p>The Austrian Traded Index (“ATX”) is the leading index of the Vienna Stock Exchange and has been designed as a benchmark for the Austrian capital market. Both the calculation and the composition of the index are defined in detail in the “Rules for the Austrian Indices of Wiener Börse AG” (“Rules”). The Rules in their currently valid version are available on the website of Wiener Börse AG (“WBAG”) www.wienerborse.at/en/indices.</p> <p>The name “Austrian Traded Index” and the abbreviation “ATX” are protected by copyright law. The use of the ATX by financial service providers for financial products is permitted on the condition that a license agreement is signed with WBAG.</p> <p>The Index Committee (“Committee”) is responsible for the provisions of the ATX. The members on the Committee are representatives of the Vienna Stock Exchange, members of WBAG, financial institutions that issue financial products on the indices, institutional investors and academic consultants. Membership in the Committee is open to all interested financial institutions, investors, and academic consultants mentioned above, and therefore, to all key stakeholders of the ATX.</p> <p>WBAG as Administrator of the index chairs the Committee and has the casting vote in the case of ties.</p> <p>The definition and the methodology of the ATX are defined in the Rules. Changes to the definitions of the index and methodology are made by the Committee.</p> <p>Measures that concern the composition of the ATX and are derived from the Rules are disclosed and disseminated immediately. Decisions of the Committee are disclosed and disseminated immediately.</p> <p>All decisions which cannot be postponed and must be reached between the quarterly Index Committee meetings are taken by the Urgent Action Committee. Decisions of the Urgent Action Committee are disseminated immediately.</p> <p>The ATX is an index calculated on the basis of the stock exchange prices determined in real time. The</p>



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		<p>ATX is published and disseminated in real time via data vending systems (including Reuters and Bloomberg). Additionally, the ATX is displayed in real time on the website of WBAG www.wienerborse.at.</p> <p>Excerpt of the „The Rules for the Austrian Indices of the Vienna Stock Exchange“</p> <p>2.1.3. The ATX has been designed as a market-oriented, transparent benchmark for the Austrian stock market. The ATX comprises those stocks of the prime market with the highest liquidity and market capitalization. As a rule, the ATX may only include stocks of issuers whose registered office and operations are headquartered in Austria. The stocks of issuers with their registered office outside of Austria may nonetheless be included in the ATX if the company's operations headquarters are in Austria and the primary place of listing of the stocks is the Vienna Stock Exchange. The primary place of listing is measured by trading volume in monetary terms as compared to other stock exchanges. The base value of the ATX was set at 1000 index points as of 2 January 1991.</p> <p>6.2. Composition and voting rights</p> <p>6.2.1. The members of the Index Committee include representatives of the members of WBAG, representatives of the financial institutions that issue financial products on the indices, representatives of institutional investors, academic advisers and representatives of the Vienna Stock Exchange. The list of members currently in force is available at www.indices.cc.</p> <p>6.2.2. Membership in the Index Committee continues for an indefinite period of time. The Index Committee decides on the admittance of new members and the expulsion of existing members.</p> <p>6.2.3. The voting members of the Committee include one representative of the Management Board of WBAG, one representative of the members of WBAG who have assumed quotation commitments for structured products or derivative market products on the ATX, one representative of institutional investors, and one representative from academic circles. Members of WBAG and institutional investors each appoint a representative with voting rights for a term of one year.</p> <p>6.3. Index Committee Chair</p> <p>6.3.1. All meetings of the Index Committee are chaired by the representative of the Management Board of WBAG (Chairperson).</p> <p>6.4. Rules of procedure of the Index Committee</p> <p>6.4.1. Decisions by the Index Committee are taken by a simple majority of the votes cast. If the votes are equally divided, the Chairperson has the decisive vote.</p> <p>6.1. Tasks and responsibilities</p>



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		<p>6.1.1. The Index Committee is the sole decision-making body for the indices and acts as the supervisory authority.</p> <p>6.1.2. The members of the Committee are under an obligation to act impartially and protect the interests of investors.</p> <p>6.1.3. The members have the duty to keep confidential any information acquired as a result of their position as members of the Index Committee.</p> <p>6.6.1. The Index Committee decides on the following issues:</p> <p>6.6.1.1. Amendments to “The Rules for the Austrian Indices of the Vienna Stock Exchange”</p> <p>6.6.1.2. In the event of extraordinary events not explicitly provided for in these Rules, the Index Committee is empowered to take the necessary decisions, always bearing the interests of the market and the intention of the index in mind.</p> <p>6.5. Index Committee meetings and Urgent Action Committee</p> <p>6.5.1. The meetings of the Index Committee are held quarterly (March, June, September and December) at the beginning of the respective month.</p> <p>6.5.2. The Urgent Action Committee decides on all matters arising between the quarterly Index Committee meetings and requiring immediate decisions.</p> <p>6.5.3. The Urgent Action Committee comprises the voting members of the Index Committee.</p> <p>6.5.4. As in the case of the regular Index Committee meetings, decisions are taken by a simple majority of the votes cast. If the votes are equally divided, the Chairperson has the decisive vote.</p> <p>6.5.5. Information regarding decisions taken by the Urgent Action Committee and the time dates set for their implementation shall be disseminated without delay.</p>
Supporting principles		
<p>Methodology</p> <ul style="list-style-type: none"> ■ Calculation criteria 	<p>B.2: A Benchmark Administrator should establish methodologies with well-defined criteria for the calculation of the Benchmark, so that judgement and qualitative assessments or other opportunities for discretionary decision making are limited and confined to well-defined stages of the Benchmark setting process or specific situations, such as cases of market disruption or operational contingencies. <i>Inter alia</i>, such criteria should address the composition of panels where applicable, the algorithm for the calculation of the Benchmark, the definition and sourcing of the data used in the calculation, and provisions regarding operational</p>	<p>The Austrian Traded Index (“ATX”) is the leading index of the Vienna Stock Exchange and has been designed as a benchmark for the Austrian capital market. Both the calculation and the composition of the index are defined in detail in the “Rules for the Austrian Indices of Wiener Börse AG” (“Rules”). The Rules in their currently valid version are available on the website of Wiener Börse AG (“WBAG”) www.wienerborse.at/en/indices.</p> <p>WBAG has extensive review processes for the calculation and publication/dissemination of the ATX. These are defined in the “ATX Index Management Manual of Wiener Börse AG (Manual)”. A description of the calculation method and publication/dissemination of the ATX is published in the “ATX Framework” and is available on the website of WBAG at www.wienerborse.at/en/indices.</p>



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	<p>continuity.</p> <p>B.3: The methodologies established by the Benchmark Administrator should be rigorous, systematic and continuous. Any amendment to an established methodology should be made according to a transparent and determined process, and be published by the Benchmark Administrator beforehand.</p>	<p>Changes to the Rules are decided by the Index Committee and published immediately after the decision is taken. Potential changes are notified to the ATX Index Committee one week before the Index Committee meeting takes place by stating these on the agenda. The responses received before the meeting are sent to all Committee members. Potential changes are then discussed at the meeting.</p> <p>Excerpt of the „The Rules for the Austrian Indices of the Vienna Stock Exchange“</p> <p>6.6.1. The Index Committee decides on the following issues:</p> <p>6.6.1.1. Amendments to “The Rules for the Austrian Indices of the Vienna Stock Exchange”</p> <p>6.6.1.2. In the event of extraordinary events not explicitly provided for in these Rules, the Index Committee is empowered to take the necessary decisions, always bearing the interests of the market and the intention of the index in mind.</p> <p>6.6.1.6. Agreement on the effective date of the changes adopted.</p> <p>6.6.1.7. Generally, the decisions taken by the Index Committee are implemented after the close of trading on the third Friday of the months of March, June, September and December after each Committee meeting. If this Friday is not an exchange trading day, then the preceding exchange trading day shall be the day on which the decisions taken by the Index Committee are implemented after trading closes.</p>
<p>Methodology</p> <ul style="list-style-type: none"> ■ Calculation errors 	<p>B.4: Benchmark Administrators should have clear policies for communicating errors in the Benchmark (whatever the reason for the error), and any subsequent re-fixing.</p>	<p>WBAG has defined procedures for the communication of problems in the calculation of the index. These are defined in the “ATX Index Management Manual of Wiener Börse AG (Manual)”. A description of the calculation method and publication/dissemination of the ATX is published in the “ATX Framework” and is available on the website of WBAG at www.wienerborse.at/en/indices.</p>
<p>Methodology</p> <ul style="list-style-type: none"> ■ Withdrawals 	<p>B.5: Without prejudice of the principles under Section G. below, a Benchmark Administrator should encourage Benchmark Submitters not to withdraw from surveys or panels.</p>	<p>Not applicable. The calculation of the ATX is not based on “submissions”.</p>
<p>Methodology</p> <ul style="list-style-type: none"> ■ Representativene 	<p>B.6: A Benchmark Administrator should regularly review the Benchmarks or the range of Benchmarks</p>	<p>To guarantee that the ATX corresponds to actual market conditions on the Austrian capital market, the Committee meets on a quarterly basis or an ad hoc basis to discuss any necessary changes to the</p>



ESMA	ESMA	Comments
<p>ss and liquidity</p>	<p>provided (such as, for example, asset classes, currencies and tenors). It should ensure that any Benchmark reflects the market or interest it seeks to represent.</p>	<p>Rules. The Rules for the ATX contain detailed provisions regarding the periodic reviews of the ATX</p> <p>Excerpt of the „The Rules for the Austrian Indices of the Vienna Stock Exchange“</p> <p>4.1. Quarterly review of the calculation parameters 4.1.1. The calculation parameters are reviewed on a quarterly basis (March, June, September and December) and any changes determined as a result of the review will be presented to the Index Committee at the beginning of the respective month. 4.1.2. The review looks at the following aspects:</p> <ul style="list-style-type: none"> ■ The number of shares issued for a stock contained in the respective index is determined if it has not yet been taken into account due to a previous corporate action. ■ Determination of the free float factor of the stocks contained in the respective index. ■ Determination of the representation factors of the stocks contained in the respective index. ■ Determination of the effective date of the changes determined. <p>4.2. Bi-annual review of the ATX composition 4.2.1. Purpose of the bi-annual review 4.2.1.1. The composition of the ATX is reviewed and adjusted on a bi-annual basis in order to provide a close- to-market, tradable and reliable index and, at the same time, keep the ATX as consistent as possible in terms of design and composition. 4.2.2. Procedure applied in the bi-annual review of the ATX composition 4.2.2.1. The bi-annual review of the index composition is made on the basis of the monthly ATX Index Watch List. 4.2.2.2. A stock qualifies for inclusion in the ATX if it ranks among the 25 most actively traded stocks in the prime market and the 25 stocks with the highest market capitalization (based on the free float). 4.2.2.3. Should the situation arise that more than 20 companies meet both criteria, the ranking by trading volume serves as the basis as to which stocks are admitted or should remain in the ATX. 4.2.2.4. If at the time of the review, information on future changes in a stock listing (e.g. delisting, change-over to another trading procedure, etc.) is known, this will result in the refraining from the inclusion of the respective stock in the bi-annual review of the ATX composition. 4.2.2.5. For reasons of index stability, a maximum of three ATX stocks can be replaced by non-ATX stocks within the bi-annual review and adjustment procedure. Any new inclusion and/or deletion must be based on the ranking of stocks according to the selection criteria. 4.2.2.6. If the ATX comprises more than 20 stocks as of the review cut-off date, a maximum of three ATX stocks can be deleted from the ATX; in this case, no new stocks or the fewer stocks are admitted to the ATX.</p>



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	<p>B.7: The data used to construct a Benchmark determination should be sufficient to represent accurately and reliably the underlying assets or prices, interest rates or other values measured by the Benchmark. These data should be anchored by observable transactions entered into at arm's length between buyers and sellers in the market for the underlying assets or prices, interest rates or other values the Benchmark measures in order for it to function as a credible indicator of prices, rates, indices or values.</p> <p>Administrators may rely on non-transactional data such as offers and bids and adjustments based on expert judgment for purposes of constructing an individual Benchmark determination, but such data should only be used as an adjunct or supplement to transactional data. The principle does not prohibit the use of non-transactional data for 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.</p>	<p>The ATX is an index calculated on the basis of the stock exchange prices determined in real time. The ATX is published and disseminated in real time via data vending systems (including Reuters and Bloomberg). Additionally, the ATX is displayed in real time on the website of WBAG www.wienerborse.at.</p> <p>Excerpt of the „The Rules for the Austrian Indices of the Vienna Stock Exchange“</p> <p>3.3.1. To calculate the indices all exchange prices fixed in the XETRA® trading system are used. Each exchange price of a stock determined in the XETRA® system leads to an index price change. If no exchange price is determined for an index stock in the course of a trading day, the most recently fixed exchange price on the Vienna Stock Exchange is used for the calculation of the index.</p> <p>3.3.2. If trading in an index stock is suspended on the Vienna Stock Exchange, the most recent exchange price available is used for the calculation of the index.</p>
<p>Methodology</p> <ul style="list-style-type: none"> ■ Disclosure of the Methodology 	<p>B.8: A Benchmark Administrator should fully disclose the Methodology to the public. Where this is not possible for legal reasons, the relevant information, such as weightings and prices of components, should be disclosed to the public prior to any changes in the composition of the Benchmark, with sufficient notice so as to allow for a proper reassessment by Stakeholders.</p>	<p>The Rules in their currently valid version are available on the website of Wiener Börse AG (“WBAG”) www.wienerborse.at/en/indices. The index calculation is done on the basis of the prices paid (stock exchange prices) that are generated in the trading system of WBAG. WBAG has drafted Calculation Rules and published these on its website at www.wienerborse.at/en/indices/download-area/index-rules.</p> <p>The Rules include, apart from the calculation formula for the ATX, also calculation examples for changes to the capital of companies included in the ATX. The Rules for the ATX contain detailed provisions regarding the calculation, composition and purpose of the index (see No. 6 above). The methodology applied is compliant with international standards and conforms to UCITS Rules. The standards observed regarding the composition method and calculation, the periodical reviews and the dissemination are in line with international standards. The Rules are available on the website www.wienerborse.at/en/indices.</p>



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		<p>Measures that concern the composition of the ATX and are derived from the Rules are disclosed and disseminated immediately. Decisions of the Committee are disclosed and disseminated immediately.</p>
Governance structure	<p>B.9: A Benchmark Administrator should have governance and compliance functions and processes to enable it to operate effectively and ensure the quality of the Benchmark. A Benchmark Administrator should provide well-defined criteria and procedures to select members of the governance and compliance functions that participate in the determination of the methodologies for the calculation of the Benchmark. Governance bodies of Benchmark Administrators should include members who are independent and appointed from outside those that through ownership or other linkages could face conflicts of interest, in particular those representing members contributing to the Benchmark. Members of governing bodies should be present and fully involved in ensuring that Benchmark Administration respects internal rules and procedures. Details of the membership of the relevant governance and compliance functions should be disclosed to the public, along with any declarations of conflicts of interests and the processes for appointment to and removal from the governance and compliance functions.</p>	<p>The definition and calculation of the ATX is done in line with the “Rules”. The oversight function is performed, on the one hand, by the ATX Working Committee, and by the Index Committee, on the other. Oversight of the operations for index calculation and dissemination is accomplished in the weekly meetings of the representatives of WBAG involved in the index calculation and dissemination (ATX Working Committee). To guarantee that the ATX corresponds to actual market conditions on the Austrian capital market, the Committee meets on a quarterly basis or an ad hoc basis to discuss any necessary changes to the Rules. The qualification of the members and the composition of the Committee are defined in the Rules. The Committee members work on an honorary basis.</p> <p>The regulations for the oversight function are defined in the “ATX Index Management Manual of Wiener Börse AG” and in the Rules.</p> <p>The regulations for the oversight function are defined in the “ATX Index Management Manual of Wiener Börse AG” and in the Rules.</p> <p>53% of the owners of WBAG are credit institutions and some 47% are listed companies (“Listed Companies”).</p> <p>Representatives of the owners from credit institutions are (also) members of the ATX Committee. Therefore, there are potential conflicts of interest between the credit institutions as owners of WBAG and as trading members and/or as issuers of (structured) products on the ATX. The following measures have been taken to prevent conflicts of interest:</p> <ul style="list-style-type: none"> ■ The calculation and composition of the ATX is based on defined and transparent rules. ■ Decisions of the Index Committee can only be reached with a majority of the votes cast. ■ The meetings of the Committee take place outside of trading hours so that the information from the consultations of the Committee cannot be used in trading. ■ Decisions of the Committee that concern the ATX are published immediately. <p>Listed companies as owners of WBAG are not represented on the Committee and therefore do not take part in the consultations and decision-making process.</p>
Oversight and control	<p>B.10: A Benchmark Administrator should have</p>	<p>Not applicable. The calculation of the ATX is not based on “submissions”.</p>



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<ul style="list-style-type: none"> ■ Submission controls 	<p>procedures to enable its oversight functions to report to their respective Supervisory Authorities, if any, any irregularities, unusual submissions or misconduct by the Benchmark Submitters of which the Administrator becomes aware.</p>	
<p>Oversight and control</p> <ul style="list-style-type: none"> ■ Supervision 	<p>B.11: A Benchmark Administrator should comply with any query from its Supervisory Authority or, when it is not under the responsibility of a Supervisory Authority, is encouraged to co-operate with the Supervisory Authorities responsible for the other actors, markets and instruments involved in the setting of the Benchmark to which it contributes.</p>	<p>WBAG is under the supervision of the FMA. The FMA has the possibility of requesting information from WBAG within the scope of its competence.</p>
<p>Oversight and control</p> <ul style="list-style-type: none"> ■ Record-keeping requirements 	<p>B.12: A Benchmark Administrator should record minutes of relevant meetings of its oversight functions along with details of all interactions between the Benchmark Administrator and Benchmark Submitters, Benchmark Calculation Agents and Benchmark Publishers. Meeting minutes should be kept for a minimum of five years and be made available to Supervisory Authorities upon request. A Benchmark Administrator should keep audit records of all data used by Benchmark Calculation Agents and Benchmark Submitters in the process of calculating the Benchmark as well as of all the Methodologies used to calculate the Benchmark.</p>	<p>WBAG stores data for an indefinite period, but as a minimum for a period of five years:</p> <ul style="list-style-type: none"> ■ The data relevant for the calculation of the index ■ Releases that concern the index ■ Agenda, documents and minutes of the ATX Index Committee meetings. ■ Other documents relating to the calculation of the index.
<p>Oversight and control</p> <ul style="list-style-type: none"> ■ Internal control mechanisms 	<p>B.13: The governance and compliance functions of a Benchmark Administrator should seek to ensure that Principles applying to Benchmark Submitters, Benchmark Calculation Agents and Benchmark Publishers are implemented. In particular, the Benchmark Administrator should require Benchmark Submitters, where they are part of the Benchmark setting process, Benchmark Calculation Agents and Benchmark Publishers to publically and periodically</p>	<p>Not applicable. The calculation of the ATX is not based on “submissions”. WBAG itself acts as benchmark publisher as well (please refer to the section “Principles for Benchmark Publishers” further below).</p>



ESMA	ESMA	Comments
	confirm adherence to these Principles.	
	B.14: A Benchmark Administrator should establish an effective whistleblowing mechanism as well as complaints procedures in order to facilitate early awareness of any misconduct or other irregularities that may arise.	Enquiries and complaints are processed in accordance with defined procedures (Enquiries and Complaints Policy of Wiener Börse AG). The document is available on the website of WBAG www.wienerborse.at/en/indices . WBAG as Administrator of the ATX itself does not have a whistleblower mechanism. However, WBAG is under the supervision of the FMA, which has an established whistleblower mechanism, www.fma.gv.at .
	B.15: A Benchmark Administrator should establish, implement and maintain adequate internal control mechanisms on the data contributed. This should include consistency and plausibility checks on the basis of transaction-based or other verifiable data where available.	WBAG has established procedures to guarantee the calculation and dissemination of the ATX. The operations relating to index calculation are the task of the Index Management team of WBAG which is also responsible for the daily monitoring of the calculation of the ATX. WBAG has extensive review processes for the calculation and publication/dissemination of the ATX. These are defined in the "ATX Index Management Manual of Wiener Börse AG (Manual)". A description of the calculation method and publication/dissemination of the ATX is published in the "ATX Framework" and is available on the website of WBAG at www.wienerborse.at/en/indices . With respect to the technical calculation of the ATX, there are defined procedures and measures in the event of technical problems with the calculation (IT security: "Urgent Action Manual of WBAG" and "Urgent Action Information Sheet of WBAG").
Oversight and control ■ Oversight of outsourced activities	B.16: A Benchmark Administrator, when outsourcing Benchmark Calculations to a third party, should retain adequate access to and control over the activities of the third party. A Benchmark Administrator should have formal selection criteria as well as contractual and service level arrangements in place when outsourcing Benchmark Calculations to a third party, and periodically audit the services performed by the Benchmark Calculation agent. In particular, a Benchmark Administrator should retain adequate access to and control over the activities of the Benchmark Calculation agent, including a proper functioning of its Benchmark computation process, and the ability to check its compliance with the Methodology of the Benchmark.	Not applicable, because no „Outsourcing of Benchmark Calculations“
Transparency	B.17: A Benchmark Administrator should publicly disclose a confirmation by its management of	A „Confirmation“ is available on the WBAG website www.wienerborse.at/en/indices .



ESMA	ESMA	Comments
	<p>compliance with the above principles as well as the confirmation received from the Benchmark Submitters, the Benchmark Calculation Agent and Benchmark Publisher.</p>	<p>WBAG as Administrator of the ATX itself does not have a whistleblower mechanism. However, WBAG is under the supervision of the FMA, which has an established whistleblower mechanism, www.fma.gv.at. With regard to the “conflicts of interest“ referred to under B.9, WBAG is willing to implement further measures for adherence, where required.</p>

Principles for Benchmark Publishers

ESMA	ESMA	Comments
<p>General Principles</p>	<p>E.1 A Benchmark Publisher should ensure reliable publication of the Benchmark it has agreed to publish.</p>	<p>WBAG itself acts as Benchmark Publisher. For the purpose of the Publication of the ATX (“ATX Publication”), WBAG has employed professional and experienced staff and maintains a stable technical infrastructure. The department Market Data Services (“MDS”) of WBAG is in charge of the ATX Publication. The tasks of MDS include inter alia the monitoring of the ATX Publication, as well as all issues concerning communication, technical support and support for Data Vendors (e.g. ThomsonReuters, Bloomberg, etc.) relating to WBAG data including the ATX. WBAG performs the ATX Publication in real-time via Data Vendors and on the WBAG website (www.wienerborse.at) using the WBAG data dissemination hub called Alliance Data High – ADH and is in line with international standards. The ATX Publication is secured via two redundant synchronized production/ “hot standby” environments. The ATX Publication is described in the “ATX Manual” and in the „ATX Framework“ (see chapter “Index Dissemination”), which is available online on www.wienerborse.at/en/indices.</p>
<p>Supporting Principles</p> <ul style="list-style-type: none"> ■ Governance Structure 	<p>E.2 A Benchmark Publisher should have clearly accountable, named individuals, at the appropriate level of seniority within the entity, responsible for Benchmark publication.</p>	<p>The ATX Publication (including dissemination monitoring and a swift management of enquiries and/or complaints) is done by experienced and highly qualified staff of the MDS department. MDS provides common e-mail accounts (i.e. mds@wienerborse.at and datafeed@wienerborse.at for the Data Vendors and support@wienerborse.at for the website clients) in order that any request concerning ATX Publication can reach at once all MDS staff involved. Additionally there is also a Hotline +43-1-53165-288 available during the ATX Publication hours. "Enquiry and Complaints Policy of Wiener Börse AG" is available online on www.wienerborse.at/en/indices.</p>
<p>Supporting Principles</p> <ul style="list-style-type: none"> ■ Governance Structure 	<p>E.3 A Benchmark Publisher should implement and maintain systems for pre- and post-publication control that are adequate to ensure consistent and timely Benchmark Publication.</p>	<p>Pre-publication control for the input data used by index calculation machine is done by team Index Management and IT. Post-publication control is done by MDS using specific monitoring tools and the ADH Feed Client. The ATX Publication on the website is monitored and documented by the website provider. As an additional post-publication control, the Index Management Team systematically</p>



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		compares the ATX data disseminated in real-time by WBAG with the ATX data displayed by ThomsonReuters.
Supporting Principles ■ Oversight and control	E.4 Before publishing Benchmark data, the Benchmark Publisher should obtain a confirmation from the Benchmark Administrator that the procedures for the validation of the submissions and calculations have been followed.	Not applicable. WBAG (as unique legal entity) fulfils both functions i.e. acts as Benchmark Administrator and as Benchmark Publisher.
Supporting Principles ■ Oversight and control	E.5 A Benchmark Publisher should have clear policies in place on how to publicise any errors in calculation due to any reason; and communicate clearly any new Benchmark fixing or determination.	<p>The ATX Publication (including specific communication policies) is described in “ATX Manual” and in „ATX Framework“, which is available on the WBAG’s website www.wienerborse.at/en/indices.</p> <p>MDS - using the communication tool Infoline - informs the Data Vendors in case of any ATX Publication problems due to errors, interruption, delays concerning calculation and/or data transmission.</p> <p>As soon as a correct ATX calculation and/or Publication restored, MDS informs all Data Vendors and the Index Management Team which informs the index licensees.</p> <p>If ATX closing values were affected, the Index Management Team sends the correct(ed) values to Data Vendors index Licensees via Infoline.</p> <p>On the WBAG website frame where the ATX data is displayed in real-time, there is the possibility to display also a status message in case of any incidents concerning ATX calculation and/or Publication.</p>
Supporting Principles ■ Transparency	E.6 A Benchmark Publisher should publish any changes to the Benchmark composition, Benchmark Submitters or any other feature of the Benchmarks.	Any changes concerning ATX composition and/or other index features are published by WBAG accordingly. The effective publication procedure is described in the “ATX Manual” and in the „ATX Framework“, which is available on the WBAG’s website www.wienerborse.at/en/indices .
Supporting Principles ■ Transparency	E.7 A Benchmark Publisher should submit to the Benchmark Administrator a confirmation by its management of compliance with the above Principles which should be published by the Benchmark Administrator in line with Principles B.13 and B.17.	WBAG (as unique legal entity) fulfils both functions i.e. acts as Benchmark Administrator and Benchmark Publisher. The said „Confirmation“ is published by WBAG on its website www.wienerborse.at/en/indices .