

Benchmark Review Policy

Date: October 2019



Contents

1	Introduction	3
2	DFBF Benchmark Review Policy	3
2.1	Introduction	3
2.2	Periodic review	3
2.3	Review Process	3
2.4	Responsibility.....	3
2.5	Final Assessment	4
2.6	Oversight Committee Recommendations.....	4
2.7	Publication of Benchmark Review	4
2.8	Post Benchmark Review actions.....	4

Copyright © 2020 by Danish Financial Benchmark Facility ApS (DFBF) all rights reserved. This document or any portion thereof may not be reproduced or used in any manner whatsoever without the express written permission of the DFBF.

1 Introduction

The Danish Financial Benchmark Facility (DFBF) is the administrator of CIBOR, T/N, CITA & SWAP, together with the DFBF benchmarks. The DFBF has developed and implemented this Benchmark Review Policy, being a formalised and approved process for the review of DFBF Benchmark's definition and methodologies at a frequency consistent with legislation, regulation and good practice.

2 DFBF Benchmark Review Policy

2.1 Introduction

The DFBF intends to provide transparency about the benchmark's purpose and methodology.

As part of this transparency, the DFBF will periodically review the underlying market to ensure the fitness of the benchmark methodology in light of the (evolving) structure and depth of the underlying market.

2.2 Periodic review

The DFBF will conduct an annual review of the underlying market and determine the fitness of the benchmark methodology.

2.3 Review Process

The DFBF will use a number of means to determine the structure and depth of the underlying market and will collect the following metrics (where available) on a quarterly basis;

- Number and size of transactions in the underlying market
- Spread to similar markets and other benchmarks/indexes
- Number of outlier submissions to the benchmark
- Number of submitters to the benchmark
- Historical data analysis
- Other metrics that are developed from time to time

The metrics will be collected by the DFBF Secretariat each quarter and provided to the DFBF Oversight Committee as part of the quarterly review process.

Each quarter the Oversight Committee will review the metrics and note any material changes to the underlying market. On an annual basis, the Oversight Committee will make their final assessment of the conditions in the underlying market.

2.4 Responsibility

The responsibility for the annual review lies with the Oversight Committee. The DFBF Secretariat will provide assistance, at the direction of the Oversight Committee, to perform analysis of underlying market activity and the collation of relevant metrics and reports.

2.5 Final Assessment

The Oversight Committee will be responsible for reviewing the conditions of the underlying market and the fitness of the benchmark methodology. It will either determine;

- a. the current benchmark methodology continues to be suitable for its intended purpose
- b. the current benchmark methodology is no longer suitable for its intended purpose and would benefit from some adjustment

2.6 Oversight Committee Recommendations

In the case that the Oversight Committee determines that the benchmark methodology is no longer suitable for its intended purpose, due to changes in the underlying market, it will recommend to the Board of Directors, one of the following courses of action;

- a. a change to the methodology to ensure its suitability to measure the underlying market conditions
- b. investigate alternate comparative benchmarks that could facilitate a cessation of the benchmark

In each case the Oversight Committee would provide a rationale for their recommendation and a request to undertake a consultation on any material change.

2.7 Publication of Benchmark Review

The DFBF will publish on its website the results of its annual review of the benchmark methodology, including any proposed changes to the methodology and the rationale behind such changes.

2.8 Post Benchmark Review actions

In the case that a review of the benchmark, under the Benchmark Review Policy, results in a recommendation for a material change to the benchmark methodology, the Board of Directors will utilise the DFBF Consultation policy to elicit feedback from stakeholders. Subject to the results of the consultation the Board of Directors may decide to implement the recommended changes and will take appropriate steps to achieve this objective.