

# CONTINGENCY PLAN FOR BENCHMARKS USED FOR INDEX-LINKED PRODUCTS: EXTRACT

## 1. Introduction and scope of application

As required by Article 28(2) of Regulation (EU 2016/1011 (the “**Benchmark Regulation**”, or the “**BMR**”) and Article 118-bis of Italian Legislative Decree no. 385 of 1 September 1993 (the “**Italian Banking Act**”) as amended from time to time, MEDIOBANCA – Banca di Credito Finanziario S.p.A. (“**Mediobanca**”, or the “**Bank**”) produces the following robust written plan (the “**Plan**”) and publishes it on its official website. The Plan sets out the actions that the Bank will take in the event of material changes to, or the cessation of, one of the benchmarks used by the Bank (the “**Benchmark**”) and applies to any product or instrument issued by Mediobanca (the “**Mediobanca Products**”) related to one of these Benchmarks.

Mediobanca, where possible and in line with market practice, has amended the contractual terms and conditions of the Mediobanca products, including robust fallback clauses that: a) identify – in line with the Process described in the Plan – the alternative Benchmark to be used in the event of the cessation of, or material change to, the original Benchmark (cf. Section 3 of the Plan); or b) provide a reference to the Plan itself.

## 2. Operating procedure to be followed in the event of cessation of or material change to the Benchmark

### Monitoring and recording of relevant events

The Plan describes the initiatives that the Bank will undertake if the cessation of, or material change to, a Benchmark occurs or is announced by the competent authorities.

“Cessation” for the purposes hereof is defined as the Benchmark ceasing, permanently or for an indefinite period of time, to be recorded or determined by the party responsible for calculating and publishing it (the Benchmark Administrator).

“Material change” is defined as the “material change that impact on the methodology used to calculate the Benchmark (e.g. if a Benchmark Administrator decides to implement a new methodology that entails a material change to the underlying financial phenomenon that the Benchmark is intended to measure). Thus the quantitative changes in a Benchmark attributable to its natural daily fluctuations do not apply in this case.

The Bank monitors the availability of the Benchmarks used in the Mediobanca Products on an ongoing basis.

### Implementation of the Contingency Plan

In the event of a Benchmark ceasing or material changes being made to it, Mediobanca will implement all the necessary activities to ensure a smooth transition from the original Benchmark to the alternative Benchmark or to the changed Benchmark. Examples of such activities include, but are not limited to:

- ◆ Performing analysis to assess the impacts on the Bank's clients/counterparties, in order to understand the potential consequences deriving from the cessation of/material change to the Benchmark used;

- ◆ Assessment of the procedure put in place by the Benchmark Administrator in order to manage material changes to and/or the cessation of the Benchmark administered by them;
- ◆ Preparation of suitable and timely disclosure to clients regarding the material change to or cessation of the Benchmark, the impacts which derive from it for the products and their contracts in force, and the means by which to obtain clarification and receive assistance from the Bank (which may include providing the relevant contact details).

### **Identification of alternative Benchmark**

In the event of material changes being made, the Bank adopts the Benchmark as materially changed by its administrator. However, if the competent authority for the relevant Benchmark recommends or identifies an alternative Benchmark, the Bank will apply the said alternative Benchmark.

If one or more Benchmarks cease, the Bank identifies the alternative Benchmark based on the criteria set forth in this Plan, which stipulate that priority should be given to any recommendations made by central banks, industry associations, working groups set up specifically for this purpose (e.g. the ECB Working Group), or by the Benchmark Administrator. In the absence of any such recommendations, the Bank identifies only alternative Benchmarks that are compliant with the Benchmark Regulation and consistent in terms of their nature, structure, characteristics and market availability with the Benchmark that has ceased to be provided or is in the process of ceasing.

The above criteria for assessment are subject to regular review by the Bank.

### **Spread adjustment**

In the event of a Benchmark ceasing or material changes being made to it, Mediobanca will assess whether or not it is necessary to apply a spread adjustment, which may have a positive or negative value or be equal to zero, to the alternative Benchmark, exclusively for the purpose of minimizing, as far as possible, potential financial impacts for any of the parties to the contract in the transition from the original Benchmark to the alternative Benchmark.

Where necessary, the Bank will use the spread adjustment recommended by the competent authority for this purpose. In the absence of such a recommendation, the Bank may apply the spread adjustment in accordance with the guidelines issued by the international category organizations or associations recognized by the market.

### **Monitoring and revision of the Plan**

The Bank monitors the revision of the Plan to ensure it is updated at all times. In the event of changes to the regulations, events due to market conditions, changes to the company's own organization or operations, or the introduction of new Benchmarks in relation to products and services offered, the Bank updates the Plan and informs clients of the changes made at the earliest opportunity and, without prejudice to the foregoing, at least once a year by the means provided for in the applicable regulations.

### 3. Table of Benchmarks used

The following table shows a list of the Benchmarks currently used by Mediobanca for its own products, and, where identified, the Alternative Benchmark that will be applied if the original Benchmark ceases to be provided.

Original Benchmark	Benchmark administrator/party responsible for calculating/publishing it	Characteristics	Alternative Benchmark	
			Type of instrument	Alternative Benchmark
EURIBOR	European Money Market Institute (EMMI)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	Mortgages, consumer finance and loans to SMEs	EFTERM + adjustment margin  If the EFTERM index is unavailable for whatever reason, the Bank will use the €STR Compounded index
			Loans, current accounts, debt security issues	€STR Compounded + adjustment margin
			Derivatives (OTC, reports and securities lending transactions)	Term-adjusted €STR + adjustment margin, which corresponds to the rate identified in accordance with the fallback provisions contained in the protocols or publications issued by the ISDA and applicable to this type of product.
€STR	European Central Bank	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	In the event of the cessation of or material changes to one of the Benchmarks referred to, the Bank will identify an alternative Benchmark in line with the provisions of the Plan.	
SOFR	Federal Reserve Bank of New York	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .		
SONIA	Bank of England	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .		
SARON	SIX Swiss Exchange	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .		
TONA	Bank of Japan	Further information on the Benchmark's characteristics have been published on		

		the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>ICE SWAP RATE (ISDAFIX)</b>	ICE Benchmark Administration Limited (IBA)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>WIBOR</b>	GPW Benchmark S.A	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>STIBOR</b>	Swedish Financial Benchmark Facility AB	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>NIBOR</b>	Norske Finansielle Referanser (NoRe)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>Bank Bill Swap Rate</b>	ASX Benchmarks Pty Ltd	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>CAC 40</b>	Euronext Paris	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>Dax (NR) EUR</b>	STOXX Ltd	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>IBEX 35</b>	IBEX 35 Sociedad de Bolsas - company belonging to Grupo de Bolsas y Mercados Españoles	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>SMI</b>	SIX Index AG	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	
<b>NASDAQ 100</b>	Nasdaq Copenhagen	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .	

<b>NIKKEI 225</b>	Nikkei Inc	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .
<b>HICP</b>	Eurostat	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .
<b>FOI</b>	ISTAT	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .
<b>CPI YOY</b>	US Bureau of Labor Statistics	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">link</a> .
<b>Australia RBA Cash Rate Target</b>	Reserve Bank of Australia (RBA)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>
<b>Brazil Cetip DI Interbank Deposit Rate</b>	B3 S.A. - Brasil, Bolsa, Balcão	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>
<b>Czech Interbank Offer Rates (PRIBOR)</b>	Czech Financial Benchmark Facility (CFBF)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>
<b>HIBOR (Hong Kong Interbank Offered Rate)</b>	Hong Kong Association of Banks (HKAB) in conjunction with the Hong Kong Monetary Authority (HKMA)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>
<b>NBH BUBOR (Budapest Interbank Offered Rate)</b>	National Bank of Hungary (NBH)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>
<b>SK KFB KORIBOR (Korean Interbank Offered Rate)</b>	Korea Financial Investment Association (KOFIA)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>
<b>ROBID-ROBOR</b>	National Bank of Romania (NBR)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>

<b>SIBOR (Singapore Interbank Offered Rate)</b>	Association of Banks in Singapore (ABS)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>	
<b>BIBOR (Budapest Interbank Offered Rate)</b>	Bank of Thailand (BOT)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>	
<b>RepoFunds Rate</b>	IHS Markit Benchmark Administration Ltd (IBA)	Further information on the Benchmark's characteristics have been published on the website of the Benchmark's administrator at the following <a href="#">Link</a>	

### **FAMILIES OF BENCHMARKS**

<b>Benchmark family</b>	<b>Benchmark administrator/party responsible for calculating/publishing it</b>	<b>Characteristics</b>	<b>Alternative Benchmark</b>
<b>STOXX</b>	STOXX Limited	Further information on this family of Benchmarks has been published on the website of the Benchmark administrator at the following <a href="#">link</a>	In the event of the cessation of or material change to one of the Benchmarks referred to, the Bank will identify an alternative Benchmark in line with the provisions of the Plan.
<b>FTSE RUSSELL</b>	FTSE International Limited	Further information on this family of Benchmarks has been published on the website of the Benchmark administrator at the following <a href="#">link</a>	
<b>S&amp;P DOW JONES INDICES</b>	S&P Dow Jones Indices Limited	Further information on this family of Benchmarks has been published on the website of the Benchmark	

		administrator at the following <a href="#">link</a>	
<b>HANG SENG INDEXES</b>	Hang Seng Indexes Company Limited	Further information on this family of Benchmarks has been published on the website of the Benchmark administrator at the following <a href="#">link</a>	
<b>NASDAQ</b>	Nasdaq Copenhagen	Further information on this family of Benchmarks has been published on the website of the Benchmark administrator at the following <a href="#">link</a>	