

**Index Administration  
Services (IAS) - Nordea  
Danish Bond Index Family**

***Benchmark Statement***

**Nordea**

Aug 2023

# 1) General Disclosures

<b>Benchmark family name</b>	Nordea Danish Bond Indices
<b>Benchmark administrator</b>	<b>IHS Markit Benchmark Administration Ltd. (IMBA)</b>
<b>Date of initial publication of this document</b>	1 August 2023
<b>Date of last update to this document</b>	1 August 2023
<b>ISIN (where available)</b>	There are presently no ISINs available or accessible for the benchmarks covered by this Benchmark Statement.
<b>Determination by contributions of input data</b>	The administrator does not receive contributions of "input data" (as defined by the <b>BMR</b> ) in relation to this family of benchmarks.
<b>Qualification of the benchmark family</b>	The Nordea Danish Bond Indices are administered as significant benchmarks.

## 2) Market or Economic Reality of the Benchmark

### General description of the market or economic reality

The Nordea Danish Bond Indices reflect the performance of DKK denominated Danish Mortgage Covered Bonds and Danish Government Bonds. Covered bonds are debt instruments, which give bondholders a preferential claim on a given cover pool normally consisting of residential mortgage loans, commercial mortgage loans and public-sector debt either in separated or mixed pools. Denmark has a variety of mortgage institutions that issue various types of covered bonds from different cover pools that are issued to investors. Covered bonds in Denmark are classified differently according to Danish covered bond legislation.

### Geographical boundaries of the market or economic reality

The Nordea Danish Bond Indices are based on the market for Danish bonds issued by the Danish government or Danish mortgage institutions. The bonds are traded in the secondary market whereby Danish and regional institutions act or market-makers.

### Other relevant information relating to the market or economic reality

Currency-hedged variants of the Danish Bond Indices exist aiming to mitigate foreign exchange risk by supplementing investment in Danish Bond Indices with a foreign exchange hedge. Currently, five Currency-hedged Indices are offered for EUR or USD.

### The methodology

The Nordea Danish Bond Indices are weighted baskets of Danish Bonds. The indices are calculated on a daily basis at the close of business using the weighted sums of constituent bond dirty prices. The nominal weights associated with each index are fixed and are recalculated at the monthly rebalancing date, which occurs two index business days before the first of each month.

The indices fall into three categories:

#### *Main Indices*

1. Danish Government Bond Index
2. Danish Mortgage Bond Index
3. Danish Callable Mortgage Bond Index
4. Danish Callable Mortgage Bond ex IO 30Y Index
5. Danish Non-callable Mortgage Bond Index
6. Danish Non-callable Mortgage Bond Short Maturity Index
7. Danish Non-callable Mortgage Bond Long Maturity Index

## 3) Potential Limitations of the Benchmark

### **Circumstances in which we would lack sufficient input data to determine the benchmark according to the methodology**

Scenarios may arise where underlying input data is not available in order to determine the index, such as if there is a disruption to a particular underlying market that prevents price discovery from taking place. Also, underlying data is provided by third party data providers. Failure of those providers may impact the administrator's ability to determine benchmarks in accordance with the applicable methodology. Generally, in the case of a market or data source disruption, the administrator will either proceed with or defer the determination of the respective index levels in accordance with the relevant Index Methodology or actions determined by the IAS **Index Committee**. Such scenarios remain rare. The Index Committee serves as the index governance body tasked with ensuring that:

- The index objective is clearly stated, and the index is expected to achieve its objective.
- The procedures documented in the methodology are transparent and clearly described.
- The eligible universe, selection criteria and weighting method for constituents are fully detailed and described.
- All aspects of an index – data, calculation, maintenance, presentation and governance – are consistent with IMBA's practices and any exceptions are explicitly discussed and decided upon by the Index Committee.

### **Circumstances in which the degree of liquidity of the underlying market becomes insufficient to ensure the integrity and reliability of the benchmark determination according to the methodology**

There may be instances where the liquidity in an underlying market is not sufficient to adequately represent the economic reality that the index seeks to measure.

Potential liquidity issues may be identified as part of the standard input data validation (e.g. abnormally long periods of stale prices) or may be identified in the context of market disruptions or brought forward through third party index owners, such potential issues are escalated to the Index Committee who will assess and determine the appropriate course of action in such cases.

## 4) Exercise of Expert Judgment and Discretion

### **Position of each function or body that may exercise discretion in the calculation of a benchmark and governance thereof**

The administrator's indices are rules based and do not typically permit the use of discretion unless there are exceptional circumstances that are not addressed by either the index rules or an administrator policy. Such scenarios may include (but are not limited to):

- Failure of data providers;
- Significant changes to the underlying market;
- Complex corporate events;
- Action by governmental or regulatory bodies that causes market disruption; and
- Events beyond human control.

In the event that the administrator needs to take action or make a decision that has not been foreseen by the methodology or associated policy, senior members of the administration team will consult internally with the Index Committee; this is to arrive at a decision that is consistent with the objective of the index in question and that causes minimal disruption to index stakeholders.

### **Ex-post evaluation process**

As above, the exercise of judgment or discretion in the calculation of the Nordea Danish Bond Indices would need to be approved by the Index Committee prior to the publication of the Nordea Danish Bond Indices to ensure that no conflict of interest arises and the index continues to reflect the underlying economic reality. A record of the Index Committee decision detailing the nature of the judgment or exercised discretion is maintained.

## **5) Methodology Changes and Benchmark Cessations**

When a material change to the index methodology is considered, IMBA publishes a consultation inviting comments from market participants. A material change alters the index objective or changes the methodology in a way that affects the likelihood that the index will achieve its objective. Examples of methodology changes that could impact the index objective include altering rules determining the index universe, the selection of its constituents, or the weighting of its constituents. Consultations are announced through a number of channels, including the administrator's website. Feedback is accepted only during the posted timeframe. Under normal circumstances, the consultation period is open for a minimum of 30 days from publication. In instances where a material change is deemed to be time sensitive, the Index Committee may determine that a shorter consultation period is required. Time sensitive changes are those that may require consideration or implementation within a shorter timeframe, and where the full consultation time period is not possible. Prior to finalising its decision, the Index Committee will consider the issues and may request clarifications from respondents as part of this process. All feedback from consultations is reviewed and considered before a final decision is made by the Index Committee. Any changes to an index methodology are announced on the website together with the effective date of the change. A summary of the consultation feedback is made available upon request after announcement of the results, with the exception of responses requesting confidentiality. Individual and company names are not provided.

### **Internal Reviews of Methodology**

**Annual Review Process.** In addition to its daily governance of indices and maintenance of index methodologies, the Index Committee reviews, at least once within any 12 month period, the index methodology to ensure the indices continue to achieve the stated objectives, and that the data and methodology remain effective. In the case that an index methodology is reviewed off cycle from the annual review, the Index Committee reserves the right to cancel the annual review if the requested review covers all the relevant issues.

## Possible impact of changes to, or the cessation of the benchmarks upon the financial contracts, financial instruments that reference the benchmark or the measurement of the performance of investment funds

The administrator will consider any changes to the methodology of the benchmark or its cessation in accordance with its published Benchmark Methodology Changes and Cessations policy. Relevant considerations might include an analysis of outstanding notional exposures, a determination of whether the change is material, and a decision to conduct a public consultation where appropriate. Where it consults, the administrator will make reasonable efforts to address stakeholder concerns expressed in response to such consultation and to allow for reasonable advance notice for stakeholders to accommodate such changes, unwind existing positions in contracts/instruments referencing the benchmark, or seek an appropriate substitute benchmark. However, there may be circumstances where external factors beyond the control of the administrator could lead to short-term changes or the termination of the Index, e.g. where a continuous disruption of the underlying market or an underlying data point requires a change to the methodology or impacts the viability of the index. In such cases, the administrator may shorten the notice period as is appropriate to the urgency of the situation.

Further details of the administrator's Changes and Cessations policy are available on the administrator's website [here](#).

## 6) Key Terms

<b>BMR</b>	means the retained EU law version of the Benchmarks Regulation ((EU) 2016/1011) that has applied in the UK from the end of the Brexit transition period (11pm on 31 December 2020).
<b>Board</b>	means the Board of Directors of IMBA.
<b>ESG</b>	means Environmental, Social, Governance.
<b>IHS Markit Benchmark Administration Ltd. (IMBA)</b>	means the administrator, which is the UK entity authorised by the FCA responsible for the daily provision of the Nordea Danish Bond Indices.
<b>Index Committee</b>	means the committee with responsibility for overseeing day to day administration of the Nordea Danish Bond Indices.
<b>Internal Oversight Committee</b>	means the Internal Oversight Committee, the independent function which coordinates and directs IMBA's benchmark oversight function.

## 7) Additional Information

### Updates to this Benchmark Statement

This Benchmark Statement will be updated whenever the information it provides is no longer correct or sufficiently precise and at least where:

- there is a change in the type of the benchmark;
- there is a material change in the methodology for determining the benchmark or, where the Benchmark Statement refers to a family of benchmarks, in the methodology for determining any benchmark within the family of benchmarks.

This Benchmark Statement will be updated at least every two years.

## Contact us

For more information, including to request index specific methodologies, please visit <https://ihsmarkit.com/products/index-administration-services.html> or contact us at [mk-indexadministrationoperations@ihsmarkit.com](mailto:mk-indexadministrationoperations@ihsmarkit.com).

## 8) Consideration of ESG Factors

Type of benchmark family	Other benchmarks
Name of the benchmarks	Nordea Danish Bond Indices
Does the benchmark pursue ESG objectives?	No
Where the answer to the above question is negative, is any EU Climate Transition Benchmark or EU Paris-Aligned Benchmark available in the portfolio of IMBA or does IMBA have benchmarks that pursue ESG objectives or benchmarks that take into account ESG factors?	Yes

## 9) Disclosure of the Alignment with the Objectives of the Paris Agreement

Does the benchmark align with the target of reducing carbon emissions or the attainment of the objectives of the Paris Agreement?	No
The temperature scenario, in accordance with international standards, used for the alignment with the target of reducing GHG emissions or attaining of the objectives of the Paris Agreement.	Not applicable.
The name of the provider of the temperature scenario used for the alignment with the target of reducing GHG emissions or the attainment of the objectives of the Paris Agreement.	Not applicable
The methodology used for the measurement of the alignment with the temperature scenario.	Not applicable
The hyperlink to the website of the temperature scenario used.	Not applicable
Date on which information has last been updated and reason for the update.	Not applicable

## 10) Disclaimer

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