Data Sufficiency Statement

Data used to construct a benchmark (price or index) should be sufficient to accurately and reliably represent the true market level measured by the benchmark, and should be based on spot market value that have been formed by the competitive forces of supply and demand and be anchored by observable transactions entered into at arm's length between buyers and sellers. Data is filtered to ensure that only arms-length transactions contribute to the benchmark. SMM puts controls in place to ensure transactional data is genuine and verifiable. More information regarding the controls can be found within the SMM Benchmark Methodology documents.

SMM seeks to receive market information from as broad a cross section of the market as possible.

If a very limited number of market-makers are active in the market, or if a limited number submit data that constitutes a significant proportion of the total data upon which the assessment is based, SMM will continue to seek fully transparent and verifiable data from the market at large and to apply SMM methodology principles of transparency, repeatability and time sensitivity.

When no bid, offer or transaction data exists, SMM may consider other verifiable data reported and published through the day, including fully and partially confirmed trades, notional trading values and other market information as provided for publication.

Under such circumstances, SMM may also be able to observe direct market activity or the effect of commonly traded commodities on illiquid markets via spread differentials and/or shipping economics.

SMM also analyzes the relationships between different products, and factors these relationships into assessments for markets where transactional data falls to low levels.

Finally, SMM normalizes other available data that may be relevant to the assessment during periods when low amounts or no transactional data exists, including transactional data from related markets, in the manner described above.

SMM seeks to avoid any distortion of the final price assessment. As such, inputs that are not verifiable will be eliminated and "one-off" or unrepeatable transaction data may be disregarded from the price assessment process unless additional verification or adequate justification for inclusion is obtained.