

Policies, processes and control activities relating to selected price assessments and their adherence with the International Organisation of Securities Commissions (“IOSCO”) Principles for Oil Price Reporting Agencies (“PRA Principles”)

Contents

Section I: Price Assessment Framework	1
Section II: Directors Statement of Adherence	6
Section III: Independent Assurance Report	8

Section I: Price Assessment Framework

Policies, processes and control activities relating to selected price assessments and their adherence with the International Organisation of Securities Commissions (“IOSCO”) Principles for Oil Price Reporting Agencies (“PRA Principles”)

INTRODUCTION

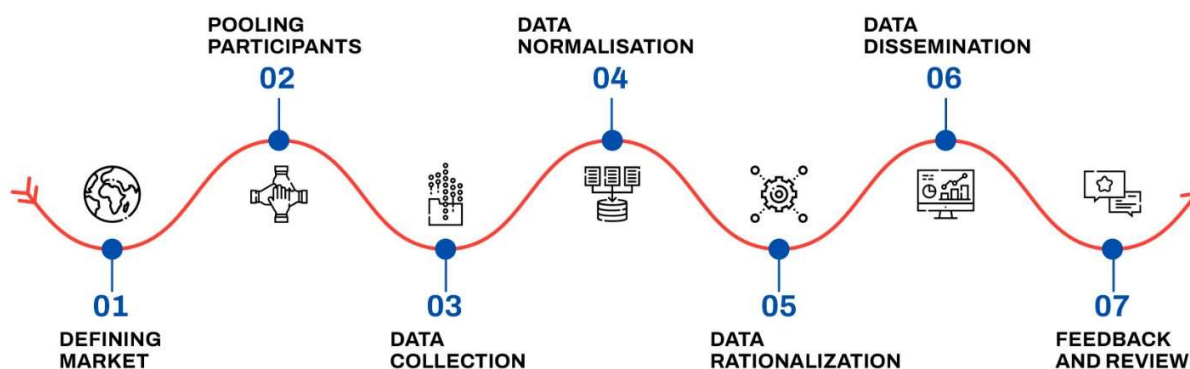
The International Organization of Securities Commissions (“IOSCO”) has published the PRA -Principles for Oil Price Reporting Agencies (“PRAs”) (thereafter, the “Principles”) on 5th October 2012. These were consequently endorsed by the G20 in November 2012. They cover governance, control, integrity and conflict management in relation to commodity benchmark price assessments published by PRAs. At present, PRAs are also encouraged for voluntary compliance to the principles to other commodity benchmark price assessments, not just those relating to oil.

OVERVIEW OF BIGMINT

BigMint Technologies Private Limited (“formerly SteelMint”) incorporated in India and provides benchmark commodity price assessments for the Indian steel industry. BigMint (formerly SteelMint) publishes benchmark commodity prices assessment that are used by the member associates with BigMint (formerly SteelMint) in the steel industry as reference prices. BigMint (formerly SteelMint), in keeping with its commitment to provide commodity prices that are fair, consistent, and reliable, based on voluntarily adopted and implemented the principles. Although BigMint (formerly SteelMint) is not authorized or regulated by any authority, it is open to and encourages regulatory mechanisms for transparent benchmark administration.

This IOSCO Statement of Compliance is published pursuant to Principle 2.21 of the IOSCO Principles. In - respect of the audit requirement for BigMint (formerly SteelMint) adherence to its stated methodology criteria -with the requirements of the IOSCO Principles. In this IOSCO Statement of Compliance, BigMint (formerly SteelMint) describes the relevant control objectives and procedures for the period from 1st January 2023 to 31st December 2023 (Period under Review) relevant to daily Notional average price (the ‘Benchmarks’) administered by BigMint (formerly SteelMint) during the Period under Review. A list of the Benchmarks and each basket of Benchmark to which those Benchmarks belong can be found in **Appendix A**.

PRICING DISCOVERY PROCESS FLOW CHART



CONTROL ENVIRONMENT

Methodologies

BigMint's robust methodology ensures accurate assessment of commodity prices. Transparency and openness in our assessment process is necessary to develop confidence among the market players. We regularly review and update our methodology to reflect market trends accurately and meet market participants.

Code of Conduct

BigMint's code of conduct mandates that all staff adhere to laws, rules, and policies, conducting themselves with high moral standards in their daily tasks, both personally and professionally.

Policies and Procedures

BigMint (formerly SteelMint) implements a variety of policies to uphold its standards of quality and integrity for market data among its employees. These policies and procedures are documented in the Compliance Manual, which serves as a comprehensive guide outlining the company's compliance framework.

- Primary market study
- Methodology, review and change reviewing process.
- Assessment on Boarding process
- DP Onboarding process
- Data submitter policy
- Data Collection and Publication Process
- Feed Management System
- Assessment amendment discontinuation and new price assessment launch procedures.
- QMS (Query Management System) complaints handling process and escalation.
- Conflict of interest policy
- Self-Declaration responsibilities of the Company
- Organization's structure
- Training, development, and new recruitment
- Job responsibility and KRA of the employee.
- IT, data retention policy and procedures
- Whistleblower Policy
- Financial audit report
- Data Licensing Policy

Most of our policies and procedures that do not violate proprietary information or confidentiality are available on public domain. The policies and documents are reviewed at least annually.

Training, development and new recruitment

BigMint's employees are qualified and experienced market analysts who can cover their primary market and step in for the secondary market if the assigned analyst is unavailable.

Market analysts receive monthly cross-training suited to their experience and daily duties. Additionally, a comprehensive onboarding process for new hires, including mandatory training, is required to ensure a sufficient workforce.

Segregation of job responsibilities

BigMint (formerly SteelMint) has functionally divided job responsibilities amongst various departments so as to avoid conflict of interest and provide transparent control over aspects of a process or transaction. The marketing and sales department is independent of the price assessment team.

Price database and maker checker concept

BigMint (formerly SteelMint) has unique systems and technology infrastructure that ensure data integrity at every stage. Our price database enforces strict pricing procedures, security of data, consistency and accountability. We have integrated peer review system ensures that all prices are verified by at least one accessor in addition to the first assessor before publishing.

External Auditing

BigMint (formerly SteelMint) has appointed SARDA & PAREEK LLP, Chartered Accountants (hereinafter referred as 'SPCA') to provide independent assurance regarding

- i. the IOSCO Statement of Compliance
- ii. the control procedures relating to the applicable requirements of the IOSCO Principles -
- iii. the published benchmark methodologies that have been adhered to in respect of the Benchmarks

Scope

Appendix A – List of the price assessments that are included within the scope of this assurance.

Commodity	Trade Type	Sub Commodity	Delivery Terms	Size & Grade	Quantity	Payment Terms	Publication Frequency	Publication Date & Time
Iron Ore Lumps	India-Domestic	Iron Ore Lumps, Odisha Index	Ex-Mines	5-18 mm, Fe 63%, DR Grade	5,000 MT Min	Advance Payment	Weekly	Saturday at 16:00 IST
Iron Ore Fines	India-Domestic	Odisha Iron Ore Index	Ex-Mines	0-10mm, Fe 62%	10000 MT	Advance Payment	Weekly	Saturday at 16:00 IST
Pellets	India-Domestic	Pellex-Pellet Index	DAP-Raipur	6-20 mm, Fe 64/63%	2500-10000 MT	Advance Payment	Bi-Weekly	Tuesday & Friday at 16:00 IST
Sponge Iron	India-Domestic	Sponge Iron	Exw-Rourkela	Lumps, FeM 80%, +/-1	100 MT Min	Advance Payment	Daily	Monday to Friday - 13:30, 17:00 IST Saturday - 13:30, 16:00 IST
Pig Iron	India-Domestic	Pig Iron	Exw-Durgapur	Steel Grade	100 MT	Advance Payment	Daily	Monday to Saturday at 16:00 IST
Melting Scrap	India-Domestic	Melting Scrap	DAP-Mandi	HMS (80:20)	100 MT	After Delivery	Daily	Monday to Friday at 12:30, 16:30 IST Saturday at 13:00, 15:30 IST
Billet	India-Domestic	Billet Index	Exw-Raipur	100x100mm, IS 2831	100 MT	Advance Payment	Daily	Monday to Friday at 11:45, 13:15, 15:30, 16:45, 18:00 IST Saturday at 11:45, 13:15, 16:00 IST
Rebar	India-Domestic	Rebar	Exy-Mumbai	12-32mm, BF Grade, IS 1786 Fe 500D	50 MT	Advance Payment	Weekly	Friday at 18:00 IST
	India-Domestic	Rebar	Exw-Mumbai	12-25mm, Induction Grade, IS 1786- 500 Fe	50 MT	Advance Payment	Daily	Monday to Saturday at 13:30 IST
HRC	India-Domestic	HRC	Exy-Mumbai	Gr E250, 2.5-8mm, IS2062,	50-100 MT Min	Regular	Bi-Weekly	Tuesday, Friday at 19:00 IST
Silico Manganese	India-Domestic	Silico Manganese	Exw Raipur	25-150mm, 60-14 (HC)	100 MT Min	Advance	Daily	Monday to Friday at 18:30 IST

Section II: Directors Statement of Adherence

Policies, processes and control activities relating to selected price assessments and their adherence with the International Organisation of Securities Commissions (“IOSCO”) Principles for Oil Price Reporting Agencies (“PRA Principles”)

DISCLAIMER

- I. BigMint (formerly SteelMint) is not regulated by the any Authority. However, it is open to and encourages regulatory mechanisms for transparent benchmark administration.
- II. All the information contained in this document (the “information”) is provided for reference purpose only. BigMint (formerly SteelMint) neither endeavors to ensure the accuracy, reliability and completeness of the Information, nor any of its affiliates makes any warranty or representation, express or implied, or accepts any responsibility or liability for, the accuracy, completeness, reliability or suitability of the Information for any particular purpose. BigMint (formerly SteelMint) accepts no liability whatsoever to any person for any loss or damage arising from any inaccuracy or omission in the Information or from any consequence, decision, action or non-action based on or in reliance upon the Information.
- III. Distribution, redistribution, reproduction, modification or transmission of the Information in whole or in part, in any form or by any means are strictly prohibited without the prior written permission of BigMint (formerly SteelMint).
- IV. The Information does not, and is not intended to, constitute investment advice, commentary or a recommendation to make any investment decision. BigMint (formerly SteelMint) is not acting for any person to whom it has provided the Information. Persons receiving the Information are not clients of BigMint (formerly SteelMint) and accordingly BigMint (formerly SteelMint) is not responsible for providing any such persons with regulatory or other protections. All persons in receipt of the Information should obtain independent investment, legal, tax and other relevant advice before making any decisions based on the Information.

EXECUTIVES STATEMENT

We are responsible for the identification of the control objectives for our business and the design and framework to effectively address the provisions of the IOSCO Principles and in compliance with the published benchmark methodologies for the Benchmarks. In our attached IOSCO Statement of Compliance, we set out a description of the relevant frameworks and control procedures together with the related control objectives and IOSCO requirements for the period from 1st January 2023 to 31st December 2023 (Period Under Review) and confirm that, except for:

- I. The IOSCO Statement of Compliance fairly describes the control procedures which were in place throughout the Period Under Review;
- II. The control procedures are suitably designed such that the specified control objectives, including the provisions of the IOSCO Principles and benchmark methodologies, can be achieved and to our knowledge and belief the described control procedures were complied with; and
- III. The control procedures were operating with sufficient effectiveness to achieve related control objectives throughout the Period Under Review.

For BigMint Technologies Private Limited

Director

Section III: Independent Assurance Report

Policies, processes and control activities relating to selected price assessments and their adherence with the International Organisation of Securities Commissions (“IOSCO”) Principles for Oil Price Reporting Agencies (“PRA Principles”)



Independent Assurance Report

OBJECTIVE

Independent Auditors report to the Directors of BigMint Technologies Private Limited (the 'Company') in respect of company's statement of compliance (the 'IOSCO Statement of Compliance') with the prescribed Principles for Oil Price Reporting Agencies ('IOSCO Principles') and adherence to its published benchmark methodologies with regards to their administration and calculation of 'benchmarks' for the period January 1, 2023 to December 31, 2023.

This report is prepared in accordance with the terms of our engagement letter Ref: 018/11/GOS/11563/2023-24 dated November 30, 2023 (the "Engagement Letter") for the purpose of reporting to the Directors of BigMint Technologies Private Limited (the "Company") in connection with the reasonable assurance engagement over the description, design and operating effectiveness of the control procedures stated in the Company IOSCO Statement of Compliance (the Company's control procedure or "subject matters"), that relate to the control objectives (the control objective or 'criteria') with regards to the Company compliances with IOSCO principles for Oil Reporting Agency ("IOSCO Principles") and the Company adherence to its published benchmark methodologies with regards to its administration of basket of benchmark, Namely

- Opening Price
- Closing Price
- Notional Average Price

(Collectively the "Benchmark") throughout the period from January 1, 2023 to December 31, 2023

DISCLAIMER

This report is made solely to the directors of the Company, and for the purpose of reporting on the Company's compliance with the IOSCO Principles and published benchmarked methodologies, as described in the IOSCO statement of compliance and in accordance with the Engagement Letter. To the Fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company' directors as a body, for our examination, for this report, or for the opinion we have formed.

We have undertaken the work for reporting to the directors those matters that we have agreed to state only for reporting purpose. Our report must not be recited or referred to in whole or in part in any other document nor made available, copies or recited to any other party, in any circumstances, without our prior written permission.

RESPONSIBILITIES OF THE COMPANY

The Directors of the Company are responsible for ensuring that the Company designs, implements and monitors compliance with policies and procedures that comply with the IOSCO Principles and with



published benchmark methodologies, and that the IOSCO Statement of Compliance has been compiled in accordance with the IOSCO Principles. The Directors of the Company are solely responsible for preparing the IOSCO Statement of Compliance which includes the control objectives and related control procedures.

The Directors of the Company are responsible for selecting the criteria for preparing and presenting the subject matter in accordance with that criterion, in all material respect. This responsibility includes establishing and maintaining internal control, adequate record and making estimates that are relevant to the preparing of the subject matter, such that it is free from misstatement, whether due to fraud or error.

RESPONSIBILITIES OF SARDA & PAREEK LLP

Our responsibility is to express an opinion on the company's detailed response to the PRA Principles in respect of the in-scope price assessments ("description") and report there on in form of independent assurance, conclusion based on the evidence obtained. We conducted our engagement in accordance with Standard on Assurance Engagements 3402, "Assurance Reports on Controls at a Service Organization," issued by the Institute of Chartered Accountants of India. That standard requires that we comply with ethical requirements and plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, company's descriptions is fairly presented and the controls are suitably designed and operating effectively.

SCOPE OF THE ASSURANCE ENGAGEMENT

The objective of assurance engagement is to report on the description, design and operating effectiveness of controls at the company and involves performing procedures to obtain evidence about the description, and the design and operating effectiveness of controls. The procedures selected depend on our judgment, including the assessment of the risks that the description is not fairly presented, and that controls are not suitably designed or operating effectively. Our procedures included testing the operating effectiveness of those controls that we consider necessary to provide reasonable assurance that the control objectives stated in the description were achieved. An assurance engagement of this type also includes evaluating the overall presentation of the description, the suitability of the objectives stated therein, and the suitability of the criteria specified by the company. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

INHERENT LIMITATIONS

Company's description is prepared to meet the common needs of a broad range of customers and their auditors and may not, therefore, include every aspect of the system that each individual customer may consider important in its own particular environment. Also, because of their nature, controls at the company may not prevent or detect all errors or omissions in processing or reporting transactions. Also, the projection of any evaluation of effectiveness to future periods is subject to the risk that controls at the company may become inadequate or fail.

A benchmark, price is not an indicator of validity or functioning of underlying market and we express no assurance over validity or functioning of underlying market. The validity and reliability of benchmarks is



dependent on (i) underlying data, market information, or inputs used in Company benchmark administration and (ii) the procedure performed by the Company to analyse that information. Our opinion does not provide assurance on any control over completeness and accuracy of underlying data, market information, or input used in the Company benchmark administration activities, nor on any such underlying data, market information or input itself. We performed no procedure on, and express no assurance over the underlying data, market information, or input used by the Company for the purpose of determining a benchmark.

CONCLUSION

In our opinion, based on the control objectives described in the Company's IOSCO Statement of Compliance in respect of the Benchmarks, which were designed to fulfil the Company's compliance with the IOSCO Principles and with the published benchmark methodologies, in all material respects:

- a) The IOSCO Statement of Compliance describes fairly the Company's control procedures that relate to the control objectives specified above which were in place throughout the period from January 1, 2023 to December 31, 2023;
- b) The control procedures are suitably designed such that there is reasonable assurance that the related control objectives would have been achieved if the described control procedures had been in place and were complied with satisfactorily throughout the period from January 1, 2023 to December 31, 2023;
- c) The control procedures that were tested, as set out in the IOSCO Statement of Compliance, were operating with sufficient effectiveness for us to obtain reasonable assurance that the related control objectives were achieved throughout the period from January 1, 2023 to December 31, 2023.

For SARDA & PAREEK LLP
Chartered Accountants
FRN no. 109262W/W100673


CA Giriraj Soni

Partner

Membership No. 109738

UDIN: 24109738BKFNEN7265

Place: Mumbai

Date: 30.03.2024

