



IDX

Indonesia Stock Exchange
Bursa Efek Indonesia

Statement of Adherence with the IOSCO Principles for Financial Benchmarks

PT BURSA EFEK INDONESIA AS OF NOVEMBER 2025

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1. Management Statement of Adherence

The Indonesia Stock Exchange (“IDX”) administers the benchmarks referenced in this report and carries this responsibility as part of our commitment to a fair, transparent, and orderly market. To support this role, IDX has established governance arrangements, methodologies, operational processes, and controls designed to align with the IOSCO Principles for Financial Benchmarks (July 2013) and uphold benchmark integrity.

Accordingly, Management acknowledges its responsibility for all aspects of the benchmark lifecycle, including the development and maintenance of methodologies, the determination and calculation of benchmark values, the dissemination of benchmark information, and the ongoing monitoring of benchmark integrity. This responsibility includes identifying, managing, and mitigating risks that may affect the accuracy, reliability, transparency, or representativeness of the benchmarks, and ensuring that stakeholders receive timely and appropriate disclosure regarding IDX’s adherence to the IOSCO Principles for Financial Benchmark.

Management has assessed the design and implementation of IDX’s benchmark governance, processes, and controls as of November 2025. Based on this assessment, Management concludes that:

- a. the governance and control framework established for the administration of the benchmarks was appropriately designed to meet the objectives of the IOSCO Principles; and
- b. the processes and control activities operated effectively, in all material respects, throughout the assessment period.

This statement is made in accordance with the governance and internal oversight arrangements of IDX and is approved by the authorized representatives of IDX Management.

9 December 2025.

Iman Rachman
President Director

Jeffrey Hendrik
Director of Business Development

2. Introduction

2.1. Background

The International Organization of Securities Commissions (“IOSCO”) issued the Principles for Financial Benchmarks in 2013 to establish a global framework for strengthening the governance, quality, transparency, and accountability of benchmark administrators. The Principles aim to ensure that benchmarks used in financial markets are robust, reliable, and free from undue influence, particularly by addressing conflicts of interest, promoting sound methodology design, and enhancing disclosure obligations.

Under the IOSCO framework, benchmark administrators are expected to publish an annual statement describing their adherence to the Principles. This includes providing sufficient information for stakeholders, regulators, and market participants to understand the governance arrangements, methodology, control environment, and oversight processes applied in benchmark administration.

The Indonesia Stock Exchange has established policies, methodologies, and governance arrangements designed to align with the IOSCO Principles. IDX has issued a Management Statement of Adherence describing its compliance with the Principles for the benchmarks within the scope of this report.

This assurance report presents the results of RSM Indonesia’s independent assessment of IDX’s description of its governance, processes, and relevant activities relating to the IOSCO Principles for Financial Benchmarks. The assessment was performed to evaluate whether IDX’s stated adherence is fairly presented and whether the described processes and control activities operated as stated during the assessment period. This report does not constitute a legal or regulatory attestation of compliance.

2.2. IDX Overview

The Indonesia Stock Exchange (“IDX”) is the sole securities exchange in Indonesia and serves as the central marketplace for the trading of equities, bonds, and other financial instruments. Formed in 2007 through the merger of the Jakarta Stock Exchange (established 1977) and the Surabaya Stock Exchange (established 1989), IDX operates under the supervision of the Financial Services Authority (“OJK”).

IDX plays a critical role in promoting the integrity, transparency, efficiency, and orderly functioning of Indonesia’s capital markets. As a self-regulatory organization (“SRO”), IDX is responsible for establishing and enforcing listing, trading, and membership rules; conducting real-time market surveillance; monitoring compliance with disclosure obligations; and coordinating with clearing and settlement institutions (KPEI and KSEI) to support secure and seamless post-trade processes.

Benchmark Administration

IDX administers a portfolio of benchmark indices designed to represent various dimensions of the Indonesian capital market. These indices support investment decision-making, serve as reference rates for financial products, and enhance market transparency. Key benchmark indices include:

- a. IDX Composite (IHSG): Represents the performance of all listed equities.
- b. IDX30: Measures the performance of 30 highly liquid stocks with large market capitalization and strong fundamentals.
- c. LQ45: Tracks 45 stocks selected based on liquidity, market capitalization, and financial soundness.
- d. IDX80: Assesses the performance of 80 liquid and high-quality stocks representing broad market activity.
- e. Sectoral Indices: Reflect performance trends within specific industry sectors.

The methodologies governing these indices—including eligibility criteria, calculation methods, rebalancing frequency, and review processes—are documented and publicly available through IDX’s published Index Guidelines.

Information Services

IDX provides real-time and historical market data, index values, and corporate action information through its trading system and public information platform. These information services support market transparency and facilitate research, portfolio management, and financial product structuring.

Commitment to Global Standards

IDX is committed to administering its benchmarks in accordance with internationally recognized principles and good practices. Its index governance structures and methodologies are designed to align with the IOSCO Principles, reflecting IDX's commitment to strengthening investor confidence, promoting product innovation, and supporting regulatory expectations in Indonesia and globally.

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DISCLAIMER

This report has been prepared exclusively for the PT Bursa Efek Indonesia (“Indonesia Stock Exchange” or “IDX”) for the purpose of providing independent assurance over IDX’s stated adherence to the IOSCO Principles for Financial Benchmarks for the specified indices. This report is intended solely for the use of IDX and its Management and should not be relied upon by any other party.

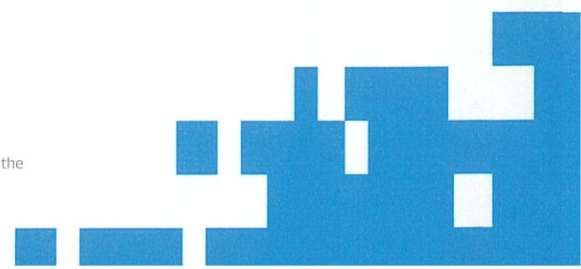
To the fullest extent permitted by applicable law, PT RSM Indonesia Konsultan (“RSM” or “RSM Indonesia”) accepts no responsibility or liability to any party other than IDX and its Management for any reliance placed on this report or any information contained herein. Any party choosing to rely on this report does so entirely at its own risk.

This report may not be distributed, reproduced, referenced, or disclosed, in whole or in part, to any third party without RSM’s prior written consent, except where such disclosure is required by law or regulation. The procedures performed by RSM were designed solely to meet the objectives of this engagement and may not be appropriate for any other purpose.

The assurance procedures performed by RSM were based on information, documentation, and representations made available to us as of the date of this report. Our work did not include an assessment of IDX’s website, public disclosures outside the scope of this engagement, or any forward-looking analysis. Accordingly, RSM does not express any assurance over events, conditions, or changes occurring after the issuance of this report.

The responsibility for the preparation, accuracy, maintenance, and integrity of IDX’s benchmark methodology, governance documentation, operational controls, disclosures, and related systems rests solely with IDX’s Management. RSM provides no assurance regarding the accuracy of benchmark calculations or any future application of IDX’s policies or methodologies.

These terms and any dispute arising out of or in connection with this report, whether contractual or non-contractual, shall be governed by and construed in accordance with the laws of the Republic of Indonesia. RSM shall be entitled to enforce the protections contained in this notice.



INDEPENDENT ASSURANCE REPORT IN RESPECT OF IDX'S RESPONSES TOWARDS IOSCO PRINCIPLES FOR FINANCIAL BENCHMARKS (IDX80, LQ45, AND IDX30)

Scope

RSM Indonesia ("RSM") was engaged to perform a reasonable assurance engagement on the statement of IDX's governance, policies, processes, and control activities relating to its administration of the IDX30, LQ45, and IDX80 indices in relation to the IOSCO Principles, as presented in Section 4 of this report.

Our engagement was conducted in accordance with Principle 17 – Audits of the IOSCO Principles for Financial Benchmarks and the terms of engagement dated 21 July 2025.

The scope of our procedures included:

- a. assessing whether the description of the Policies and Relevant Activities presented by IDX's Management in Section 4 is fairly stated, in all material respects; and
- b. assessing whether the processes and control activities described within those Policies and Relevant Activities operated as stated for the period December 2024 to November 2025.

This engagement did not include an assessment of:

- a. the adequacy of the design of IDX's benchmark governance framework;
- b. the effectiveness of controls beyond confirming that they operated as described; or
- c. the accuracy or validity of index calculations or calculation outcomes.

Our assurance procedures were limited solely to the benchmarks in scope—IDX30, LQ45, and IDX80—and to the Policies and Relevant Activities described in Section 4.

Independence and Quality Management

RSM complied with all applicable independence and ethical requirements, founded on the principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

RSM also applied the International Standard on Quality Management, which requires the establishment and maintenance of a system of quality management designed to provide reasonable assurance of compliance with professional standards and applicable legal and regulatory requirements.

Management Responsibilities

IDX's Management is responsible for:

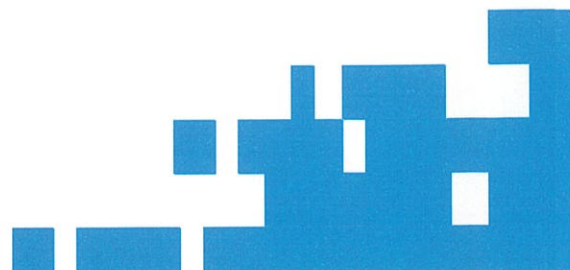
- a. establishing and maintaining governance arrangements and internal controls supporting adherence to the IOSCO Principles for Financial Benchmarks;
- b. identifying, assessing, and managing risks that may affect benchmark integrity, transparency, reliability, or representativeness;
- c. preparing the Management Statement of Adherence; and
- d. preparing the description of the Policies and Relevant Activities presented in Section 4, including ensuring that such information is complete, accurate, and fairly stated.

Our assurance engagement does not relieve Management of these responsibilities.

Our Responsibilities

Our responsibility is to express a reasonable assurance conclusion on whether:

- a. the description presented in Section 4 is fairly stated, in all material respects; and
- b. the processes and control activities described were operating as stated during the assessment period.



We do not express an opinion on:

- a. the design adequacy of IDX's governance or control framework;
- b. the accuracy or correctness of index calculations; or
- c. the effectiveness of IDX's overall system of internal control.

Our Approach

We conducted our engagement in accordance with ISAE 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

Our procedures included, among others:

- a. reviewing governance documentation, methodology guidelines, operational procedures, and relevant policies;
- b. conducting interviews and walkthroughs with IDX personnel responsible for benchmark governance and operations;
- c. inspecting records, approvals, and evidence of control execution on a sample basis;
- d. evaluating whether the description in Section 4 is consistent with the underlying documentation and evidence obtained; and
- e. assessing whether the processes and control activities described operated as stated throughout the period December 2024 to November 2025.

The detailed procedures performed for each IOSCO Principle are summarized in the "RSM Procedures" column of Section 4.

Conclusion

Based on the procedures performed and the evidence obtained for the period December 2024 to November 2025, nothing has come to our attention that causes us to believe that:

- a. the description of the Policies and Relevant Activities presented in Section 4 is not fairly stated, in all material respects; or
- b. the processes and control activities described therein did not operate as stated, in all material respects, during the assessment period.

Limitations

Our procedures were not designed to assess the accuracy of index calculations or the adequacy of the design of IDX's benchmark methodology or governance framework. Our conclusion is based on historical information made available to us up to the date of this report. Any projection of our findings to future periods may be affected by changes in control activities, governance arrangements, or market conditions.

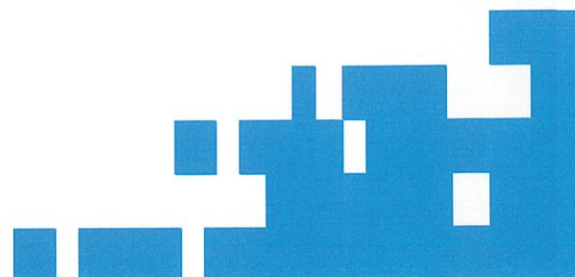
Intended Use

This report has been prepared solely for the use of IDX and its Management for the purposes of evaluating IDX's stated adherence to the IOSCO Principles for Financial Benchmarks. It may not be used, referenced, or distributed for any other purpose without RSM's prior written consent, except where such disclosure is required by law.



RSM Indonesia Konsultan

Angela Indirawati Simatupang
Senior Partner
December 9, 2025



5. IOSCO Principles and IDX's Response (IDX80, LQ45, IDX30)

The indices included within the scope of this engagement are:

- IDX30: An index that measures the stock price performance of 30 stocks with relatively large market capitalization, high liquidity, and good fundamentals.
- LQ45: An index that measures the stock price performance of 45 stocks with relatively large market capitalization, high liquidity, and good fundamentals.
- IDX80: An index that measures the stock price performance of 80 stocks with relatively large market capitalization, high liquidity, and good fundamentals.

Below outlines how IDX complies with the IOSCO Principles for Financial Benchmarks. Each principle is addressed through established governance structures, documented methodologies, and operational controls to ensure transparency, reliability, and accountability.

5.1. Principle 1 – Overall Responsibility of the Administrator

IOSCO Requirements	
<p>The Administrator should retain primary responsibility for all aspects of the Benchmark determination process. For example, this includes:</p> <ol style="list-style-type: none"> Development: The definition of the Benchmark and Benchmark Methodology; Determination and Dissemination: Accurate and timely compilation and publication and distribution of the Benchmark; Operation: Ensuring appropriate transparency over significant decisions affecting the compilation of the Benchmark and any related determination process, including contingency measures in the event of absence of or insufficient inputs, market stress or disruption, failure of critical infrastructure, or other relevant factors; and Governance: Establishing credible and transparent governance, oversight and accountability procedures for the Benchmark determination process, including an identifiable oversight function accountable for the development, issuance and operation of the Benchmark. 	
IDX's Response:	RSM Procedures:
<p>IDX as the administrator is fully responsible for all aspects of managing the IDX Flagship Indices (IDX80, LQ45, and IDX30) through all stages including but not limited to development, determination, dissemination, operation, governance and the methodology of the benchmark. Policies and managing processes of each index are further discussed in their individual rulebooks and methodology guidance.</p> <p>IDX is also responsible for the development and maintenance of the benchmark methodology document namely the Index Guide. Definition of the benchmark as well as methodology used in the benchmark is as explained in the respective Index Guide document.</p>	<p>RSM reviewed IDX's governance and benchmark administration documentation, including the Index Guide, Index Manuals, Index Committee Charter, and related SOPs governing roles and responsibilities.</p> <p>We performed walkthroughs with the Research Division and relevant operational teams to</p>

IOSCO Requirements

IDX ensures that the operational implementation of its flagship index is credible and transparent regarding significant decisions. This transparency is explained in the Index Guidelines document and in the internal Standard of Procedures of the IDX trading system for contingency measures in the event of market stress or disruption.

As mentioned above, the Index Guidelines explain IDX's responsibilities for the determination of a benchmark. In addition, the Index Guide also covers IDX indices operations over significant decision and contingency measures.

The responsibility for dissemination of the benchmark to its licensed clients and licensed intermediaries is defined within IDX bilateral contract agreement for index and data services licenses. The benchmark publication and dissemination is delivered in a timely manner and accessible by the public on the IDX website (www.idx.co.id/en/market-data/stocks-data/stock-index/).

To ensure a robust determination process for index construction, IDX Index Management Team is responsible for the index maintenance and operations, overseen by an Index Committee that supervises the constituent selection process. The committees, their oversight functions, member composition, and accountability procedures related to benchmark determination are further detailed under Principle 5.

understand how responsibilities for methodology development, oversight, approval, and publication are assigned and executed. We inspected examples of index calculation files, constituent selection packages, and approval records to assess consistency with the documented governance structure.

We also evaluated IDX's licensing arrangements and dissemination procedures to confirm alignment between documented responsibilities and actual practice.

Based on these procedures, we observed that responsibility assignments were clearly documented and consistently implemented.

No exceptions were noted.

5.2. Principle 2 - Overall Responsibility of Third Parties

IOSCO Requirements

Where activities relating to the Benchmark determination process are undertaken by third parties - for example collection of inputs, publication or where a third party acts as Calculation Agent - the Administrator should maintain appropriate oversight of such third parties.

The Administrator (and its oversight function) should consider adopting policies and procedures that:

- a) Clearly define and substantiate through appropriate written arrangements the roles and obligations of third parties who participate in the Benchmark determination process, as well as the standards the Administrator expects these third parties to comply with;
- b) Monitor third parties' compliance with the standards set out by the Administrator;
- c) Make Available to Stakeholders and any relevant Regulatory Authority the identity and roles of third parties who participate in the Benchmark determination process; and
- d) Take reasonable steps, including contingency plans, to avoid undue operational risk related to the participation of third parties in the Benchmark determination process.

IOSCO Requirements	
This Principle does not apply in relation to a third party from whom an Administrator sources data if that third party is a Regulated Market or Exchange.	
IDX's Response:	RSM Procedures:
<p>IDX performs all functions related to the determination, calculation, and publication of the IDX80, LQ45, and IDX30 indices internally, and does not outsource any part of this process to external third parties. The source of data used is the executed trading data in the regulated exchange, which falls under the exception stated in Principle 2 for data obtained from a Regulated Market or Exchange. Accordingly, the third-party oversight provisions under Principle 2 are not applicable to these indices.</p> <p>For indices where external parties are involved for data acquisition, calculation, or publication, IDX maintains written agreements, defined obligations, monitoring procedures, and contingency plans in accordance with Principle 2.</p>	<p>RSM reviewed IDX's benchmark determination and data sourcing procedures and conducted walkthroughs with the Research Division to confirm that no external entities provide submissions or perform any part of the index determination.</p> <p>We verified that all benchmark inputs originate from IDX's regulated trading system and that no third-party data providers or calculation agents are used for IDX30, LQ45, or IDX80.</p> <p>We also inspected relevant contracts and SOPs to confirm that no outsourcing arrangements exist for these indices.</p> <p>As this principle applies only where external submitters or third parties contribute to benchmark determination, we concluded that it is not applicable to the indices in scope.</p> <p>Accordingly, no exceptions or deviations were assessed.</p>

5.3. Principle 3 – Conflict of Interest for Administrator

IOSCO Requirements
<p>To protect the integrity and independence of Benchmark determinations, Administrators should document, implement and enforce policies and procedures for the identification, disclosure, management, mitigation or avoidance of conflicts of interest. Administrators should review and update their policies and procedures as appropriate.</p> <p>Administrators should disclose any material conflicts of interest to their users and any relevant Regulatory Authority, if any.</p>

IOSCO Requirements

The framework should be appropriately tailored to the level of existing or potential conflicts of interest identified and the risks that the Benchmark poses and should seek to ensure:

- a) Existing or potential conflicts of interest do not inappropriately influence Benchmark determinations;
- b) Personal interests and connections or business connections do not compromise the Administrator's performance of its functions;
- c) Segregation of reporting lines within the Administrator, where appropriate, to clearly define responsibilities and prevent unnecessary or undisclosed conflicts of interest or the perception of such conflicts;
- d) Adequate supervision and sign-off by authorised or qualified employees prior to releasing Benchmark determinations;
- e) The confidentiality of data, information and other inputs submitted to, received by or produced by the Administrator, subject to the disclosure obligations of the Administrator;
- f) Effective procedures to control the exchange of information between staff engaged in activities involving a risk of conflicts of interest or between staff and third parties, where that information may reasonably affect any Benchmark determinations; and
- g) Adequate remuneration policies that ensure all staff who participate in the Benchmark determination are not directly or indirectly rewarded or incentivised by the levels of the Benchmark.

An Administrator's conflict of interest framework should seek to mitigate existing or potential conflicts created by its ownership structure or control, or due to other interests the Administrator's staff or wider group may have in relation to Benchmark determinations. To this end, the framework should:

- a) Include measures to avoid, mitigate or disclose conflicts of interest that may exist between its Benchmark determination business (including all staff who perform or otherwise participate in Benchmark production responsibilities), and any other business of the Administrator or any of its affiliates; and
- b) Provide that an Administrator discloses conflicts of interest arising from the ownership structure or the control of the Administrator to its Stakeholders and any relevant Regulatory Authority in a timely manner.

IDX's Response:

IDX documents transparent and objective calculation methodologies and publishes them in the form of the Index Guide and Factsheet, which include the methodologies for index constituent selections by quantifying public information and data. IDX believes that this will exclude the arbitrariness and conflicts of interest from the index calculation processes.

In addition, the IDX Indices are calculated and published automatically through IDX's trading system; therefore, IDX believes that the possibility of conflicts of interest is extremely low. IDX ensures that it has implemented appropriate surveillance and approval processes for the selection of index constituents and data maintenance (such as stock split information and other corporate actions).

RSM Procedures:

RSM reviewed the Code of Ethics, remuneration policies, Index Committee Charter, and relevant governance materials addressing conflicts of interest.

We conducted walkthroughs with members of the Research Division and governance personnel to understand how conflicts are identified, reviewed, and mitigated.

We inspected records of integrity statements, committee member declarations, and approval

IOSCO Requirements

IDX also enforces a Company Code of Ethics and internal policies that prohibit IDX employees and management from purchasing stocks traded on the exchange. Furthermore, IDX has an Index Committee Charter that sets ethical standards governing the committee's role and function in overseeing benchmark-related decisions. Through these policies, IDX seeks to prevent conflicts of interest that could potentially influence periodic reviews and the selection processes of stocks included in the indices. IDX affirms that employee remuneration is not linked to any index performance.

The process of preparing, processing, and publishing the index result is carried out through a tiered review and quality control mechanism. IDX has a set of review process from each stage of index preparation starting from the data preparation to the publication of index by authorised Management, Index Committee and Board of Directors to ensure accuracy, reliability, and consistent of the index results in accordance with the index methodology.

workflows to confirm that conflict-mitigation mechanisms were operating as described.

We also evaluated the degree of discretion allowed under the methodology and reviewed how decisions involving discretion were escalated and documented.

No exceptions were noted.

5.4. Principle 4 – Control Framework for Administrators

IOSCO Requirements

An Administrator should implement an appropriate control framework for the process of determining and distributing the Benchmark. The control framework should be appropriately tailored to the materiality of the potential or existing conflicts of interest identified, the extent of the use of discretion in the Benchmark setting process and to the nature of Benchmark inputs and outputs. The control framework should be documented and available to relevant Regulatory Authorities, if any. A summary of its main features should be Published or Made Available to Stakeholders.

This control framework should be reviewed periodically and updated as appropriate. The framework should address the following areas:

- a) Conflicts of interest in line with Principle 3 on conflicts of interests;
- b) Integrity and quality of Benchmark determination:
 - i. Arrangements to ensure that the quality and integrity of Benchmarks is maintained, in line with principles 6 to 15 on the quality of the Benchmark and Methodology;
 - ii. Arrangements to promote the integrity of Benchmark inputs, including adequate due diligence on input sources;
 - iii. Arrangements to ensure accountability and complaints mechanisms are effective, in line with principles 16 to 19; and
 - iv. Providing robust infrastructure, policies and procedures for the management of risk, including operational risk.
- c) Whistleblowing mechanism:

Administrators should establish an effective whistleblowing mechanism to facilitate early awareness of any potential misconduct or irregularities that may arise. This mechanism should allow for external reporting of such cases where appropriate.
- d) Expertise:

IOSCO Requirements

- i. Ensuring Benchmark determinations are made by personnel who possess the relevant levels of expertise, with a process for periodic review of their competence; and
- ii. Staff training, including ethics and conflicts of interest training, and continuity and succession planning for personnel.

Where a Benchmark is based on Submissions: Administrators should promote the integrity of inputs by:

- a) Ensuring as far as possible that the Submitters comprise an appropriately representative group of participants taking into consideration the underlying Interest measured by the Benchmark;
- b) Employing a system of appropriate measures so that, to the extent possible, Submitters comply with the Submission guidelines, as defined in the Submitter Code of Conduct and the Administrators' applicable quality and integrity standards for Submission;
- c) Specifying how frequently Submissions should be made and specifying that inputs or Submissions should be made for every Benchmark determination; and
- d) Establishing and employing measures to effectively monitor and scrutinise inputs or Submissions. This should include pre-compilation or pre-publication monitoring to identify and avoid errors in inputs or Submissions, as well as ex-post analysis of trends and outliers.

IDX's Response:

IDX has a control framework to ensure the integrity and neutrality of its index administration processes. The Company's Code of Ethics prohibits employees from owning or purchasing stocks traded on the IDX, reinforcing the avoidance of conflicts of interest. Additionally, the Index Committee Charter regulates voting rights and protects the neutrality of the Index Committee. The Index Committee Charter also regulates ethical standards, including rules on conflicts of interest that may influence periodic reviews and the selection of index constituents.

In order to facilitate early awareness of any potential misconduct or irregularities that may arise, IDX has a robust whistleblowing system for all trading operations and products, including the indices published on the IDX website. This whistleblowing system is consistently promoted and easily accessible to capital market stakeholders and the public. In addition, IDX had also been certified for the ISO 37001 Anti-Bribery Management Systems.

In regard to ensuring benchmark determinations are made by personnel who possess the relevant levels of expertise, IDX has a specific training program in place for index development and management aimed at staff who carry out index operations on a yearly basis providing learning and development training sessions to deepen the necessary technical skills required for specific job function. Furthermore, prior to the release of an index announcement, the Index Committee is also treated as an expert, particularly in

RSM Procedures:

RSM examined IDX's control framework documentation, including SOPs, risk mitigation measures, segregation of duties, training materials, and whistleblowing mechanisms.

We conducted walkthroughs with relevant teams to understand how controls over governance, methodology application, data processing, system access, and dissemination are performed.

We inspected evidence of training completion, system access logs, approval workflows, and internal control monitoring.

We evaluated the alignment of control activities with IOSCO expectations, including the presence of preventative, detective, and oversight controls.

No exceptions were noted.

IOSCO Requirements

the oversight of methodology, periodic reviews, and the selection of index constituents, ensuring that decisions are made with a high level of competence and integrity.

Further reference on IDX's policies and procedures to prevent conflict of interest can be found in Principle 3.

5.5. Principle 5 – Internal Oversight

IOSCO Requirements

Administrators should establish an oversight function to review and provide challenge on all aspects of the Benchmark determination process. This should include consideration of the features and intended, expected or known usage of the Benchmark and the materiality of existing or potential conflicts of interest identified.

The oversight function should be carried out either by a separate committee, or other appropriate governance arrangements. The oversight function and its composition should be appropriate to provide effective scrutiny of the Administrator. Such oversight function could consider groups of Benchmarks by type or asset class, provided that it otherwise complies with this Principle.

An Administrator should develop and maintain robust procedures regarding its oversight function, which should be documented and available to relevant Regulatory Authorities, if any. The main features of the procedures should be made available to Stakeholders. These procedures should include:

- a) The terms of reference of the oversight function;
- b) Criteria to select members of the oversight function;
- c) The summary details of membership of any committee or arrangement charged with the oversight function, along with any declarations of conflicts of interest and processes for election, nomination or removal and replacement of committee members.

The responsibilities of the oversight function include:

- a) Oversight of the Benchmark design:
 - i. Periodic review of the definition of the Benchmark and its Methodology;
 - ii. Taking measures to remain informed about issues and risks to the Benchmark, as well as commissioning external reviews of the Benchmark (as appropriate);
 - iii. Overseeing any changes to the Benchmark Methodology, including assessing whether the Methodology continues to appropriately measure the underlying Interest, reviewing proposed and implemented changes to the Methodology, and authorising or requesting the Administrator to undertake a consultation with Stakeholders where known or its Subscribers on such changes as per Principle 12; and

IOSCO Requirements

- iv. Reviewing and approving procedures for termination of the Benchmark, including guidelines that set out how the Administrator should consult with Stakeholders about such cessation.
- b) Oversight of the integrity of Benchmark determination and control framework:
 - i. Overseeing the management and operation of the Benchmark, including activities related to Benchmark determination undertaken by a third party;
 - ii. Considering the results of internal and external audits, and following up on the implementation of remedial actions highlighted in the results of these audits; and
 - iii. Overseeing any exercise of Expert Judgment by the Administrator and ensuring Published Methodologies have been followed.

Where conflicts of interests may arise in the Administrator due to its ownership structures or controlling interests, or due to other activities conducted by any entity owning or controlling the Administrator or by the Administrator or any of its affiliates: the Administrator should establish an independent oversight function which includes a balanced representation of a range of Stakeholders where known, Subscribers and Submitters, which is chosen to counterbalance the relevant conflict of interest.

Where a Benchmark is based on Submissions: the oversight function should provide suitable oversight and challenge of the Submissions by:

- a) Overseeing and challenging the scrutiny and monitoring of inputs or Submissions by the Administrator. This could include regular discussions of inputs or Submission patterns, defining parameters against which inputs or Submissions can be analysed, or querying the role of the Administrator in challenging or sampling unusual inputs or Submissions;
- b) Overseeing the Code of Conduct for Submitters;
- c) Establishing effective arrangements to address breaches of the Code of Conduct for Submitters; and
- d) Establishing measures to detect potential anomalous or suspicious Submissions and in case of suspicious activities, to report them, as well as any misconduct by Submitters of which it becomes aware to the relevant Regulatory Authorities, if any.

IDX's Response:

The oversight principle is carried out by the IDX Index Committee, which serves as an independent body overseeing index operations for indices. IDX ensures that the Index Committee acts independently, where:

1. In determining index constituents, IDX adheres to layered guidelines (SOPs, manuals, committee charters).
2. IDX has an Index Committee that serves as an oversight body and is distinct from the Index Management Team that manages the day-to-day operations of the IDX indices. The Index Committee is responsible for overseeing the index calculation process, selection of constituents based on their market activity concerns, and approving changes to the index methodology.
3. The majority of IDX Index Committee members come from non-operational index teams, and all committee members are independent, as evidenced by their signed integrity pacts. The diversity of

RSM Procedures:

RSM reviewed Index Committee documentation, including charters, meeting minutes, review materials, and approval records.

We conducted walkthroughs to understand how the Committee oversees methodology decisions, periodic reviews, and constituent selection. We inspected evidence of

IOSCO Requirements	
<p>backgrounds and competencies among Index Committee members helps mitigate potential conflicts of interest within the Index Management Team and among other Index Committee members.</p> <p>4. The Committee and IDX board of directors are prohibited from adding or selecting stocks for inclusion to the index and may only provide recommendations in cases of concern in relation to market and potential constituent's compliance activities.</p> <p>Furthermore, to ensure overall index compliance, IDX conducts post-audits by internal and external parties such as by the Internal Audit Unit and by the Indonesia Financial Services Authority (OJK), ensuring effective internal control, compliance, and operational integrity of the indices.</p>	<p>segregation of duties between operational teams and the oversight function.</p> <p>We also reviewed internal audit reports and the documentation that were requested by regulator to understand the broader oversight environment supporting benchmark administration.</p> <p>No exceptions were noted.</p>

5.6. Principle 6 – Benchmark Design

IOSCO Requirements	
<p>The design of the Benchmark should seek to achieve and result in an accurate and reliable representation of the economic realities of the Interest it seeks to measure and eliminate factors that might result in a distortion of the price, rate, index or value of the Benchmark.</p> <p>Benchmark design should take into account the following generic non-exclusive features, and other factors should be considered, as appropriate to the particular Interest:</p> <ol style="list-style-type: none"> Adequacy of the sample used to represent the Interest; Size and liquidity of the relevant market (for example whether there is sufficient trading to provide observable, transparent pricing); Relative size of the underlying market in relation to the volume of trading in the market that references the Benchmark; The distribution of trading among Market Participants (market concentration); Market dynamics (e.g., to ensure that the Benchmark reflects changes to the assets underpinning a Benchmark) 	
IDX's Response:	RSM Procedures:
<p>IDX Index Development Team is responsible for the development of Benchmark design and implementation for new indices.</p> <p>The detailed design of the index is outlined in the business specification document, which includes purpose, design rationale and key features. The teams then conduct extensive back-testing and validation activities to ensure that the model and methodology are in alignment, and the index is created/maintained in accordance with the intended design.</p>	<p>RSM reviewed methodology design documents, business specifications, and back-testing files to assess how benchmark objectives were translated into methodology features.</p> <p>Walkthroughs with the Research Division confirmed the rationale for selection criteria, weighting schemes, liquidity thresholds, and market representation concepts.</p>

IOSCO Requirements

The design of indices takes into account, as appropriate, features such as size, trading frequency, liquidity, volume, and market dynamics as documented in the individual index methodology, which includes factors such as eligibility criteria and frequency of regular rebalancing and reconstitution.

Further, IDX Index Guide, IDX Index Handbook, Factsheet and IDX internal documents address factors that apply across all index methodologies such as calculation methods.

We inspected internal validation analyses and model evaluation records to assess whether benchmark design decisions were evidence-based and documented.

We assessed whether selected data inputs and criteria were consistent with the intended purpose of each index.

No exceptions were noted.

5.7. Principle 7 – Data Sufficiency

IOSCO Requirements

The data used to construct a Benchmark determination should be sufficient to accurately and reliably represent the Interest measured by the Benchmark and should:

- a) Be based on prices, rates, indices or values that have been formed by the competitive forces of supply and demand in order to provide confidence that the price discovery system is reliable; and
- b) Be anchored by observable transactions entered into at arm's length between buyers and sellers in the market for the Interest the Benchmark measures in order for it to function as a credible indicator of prices, rates, indices or values.

This Principle requires that a Benchmark be based upon (i.e., anchored in) an active market having observable Bona Fide, Arms-Length Transactions. This does not mean that every individual Benchmark determination must be constructed solely of transaction data. Provided that an active market exists, conditions in the market on any given day might require the Administrator to rely on different forms of data tied to observable market data as an adjunct or supplement to transactions. Depending upon the Administrator's Methodology, this could result in an individual Benchmark determination being based predominantly, or exclusively, on bids and offers or extrapolations from prior transactions. This is further clarified in Principle 8.

Provided that sub paragraphs (a) and (b) above are met, Principle 7 does not preclude Benchmark Administrators from using executable bids or offers as a means to construct Benchmarks where anchored in an observable market consisting of Bona Fide, Arms-Length transactions.

- a) This Principle also recognizes that various indices may be designed to measure or reflect the performance of a rule-based investment strategy, the volatility or behaviour of an index or market or other aspects of an active market. Principle 7 does not preclude the use of non- transactional data for such indices that are not designed to represent transactions and where the nature of the index is such that non-transactional data is used to reflect what the index is designed to measure. For example, certain volatility indices, which are designed to measure the expected volatility of an index of

IOSCO Requirements	
securities transactions, rely on non-transactional data, but the data is derived from and thus “anchored” in an actual functioning securities or options market.	
IDX’s Response:	RSM Procedures:
<p>To ensure credibility, accuracy and reliability of the benchmark, IDX measures and calculates the sufficiency of all data inputs for its indices to assure that the accuracy of a benchmark is sufficiently met. These determinations may include, but are not limited to, stock price and trading information, and related financial data.</p> <p>IDX utilizes available internal data sources which are observable in the market to construct and represent the methodology of the Benchmark. The Benchmark Methodology documents describe the treatment of the data used in the Benchmark calculation. Additionally, IDX maintains an internal document supporting the Benchmark determination process.</p>	<p>RSM inspected the Index Guide, Index Manual, and calculation work files to confirm that all inputs used in benchmark determination were based on observable executed transactions.</p> <p>We verified through walkthroughs and system demonstrations that price and volume inputs were sourced automatically from IDX’s trading engine without manual intervention.</p> <p>We assessed the extent to which input data reflects arm’s-length trading activity and whether alternative data sources were used in exceptional circumstances.</p> <p>We also examined the documentation of input treatment rules.</p> <p>No exceptions were noted.</p>

5.8. Principle 8 – Hierarchy of Data Inputs

IOSCO Requirements
<p>An Administrator should establish and publish or make available clear guidelines regarding the hierarchy of data inputs and exercise of Expert Judgment used for the determination of Benchmarks. In general, the hierarchy of data inputs should include:</p> <ol style="list-style-type: none"> Where a Benchmark is dependent upon Submissions, the Submitters’ own concluded arms-length transactions in the underlying interest or related markets; Reported or observed concluded Arm’s-length Transactions in the underlying interest; Reported or observed concluded Arm’s-length Transactions in related markets; Firm (executable) bids and offers; and Other market information or Expert Judgments.

IOSCO Requirements

- b) Provided that the Data Sufficiency Principle is met (i.e., an active market exists), this Principle is not intended to restrict an Administrator's flexibility to use inputs consistent with the Administrator's approach to ensuring the quality, integrity, continuity and reliability of its Benchmark determinations, as set out in the Administrator's Methodology. The Administrator should retain flexibility to use the inputs it believes are appropriate under its Methodology to ensure the quality and integrity of its Benchmark. For example, certain Administrators may decide to rely upon Expert Judgment in an active albeit low liquidity market, when transactions may not be consistently available each day. IOSCO also recognizes that there might be circumstances (e.g., a low liquidity market) when a confirmed bid or offer might carry more meaning than an outlier transaction. Under these circumstances, non-transactional data such as bids and offers and extrapolations from prior transactions might predominate in a given Benchmark determination.

IDX's Response:

Before publication of the index, the index goes through tiered approval by the Index Committee and IDX Board of Director. The indices are then calculated and published based on executed transaction prices at the regulated exchange market. Using observable market transactions as the highest-priority source represents concluded arm's length market transactions. Expert Judgment is only permitted in exceptional situations where market transactional data is unavailable or insufficient (e.g., prolonged unexpected market halts or closures), and the specific conditions, permissible judgment inputs, and review steps are prescribed in the publicly available Index Guide and supported by internal Index Manuals.

RSM Procedures:

RSM reviewed documented input hierarchies and SOPs that outline when transaction data, observable market data, or expert judgment may be used.

We conducted walkthroughs and reviewed examples of exceptional market conditions to understand how judgments, if applied, were documented and approved.

We evaluated oversight records demonstrating review of any deviations from normal data input hierarchy.

We also assessed whether sufficient controls exist to prevent unauthorized or undocumented discretionary adjustments.

No exceptions were noted.

5.9. Principle 9 – Transparency of Benchmark Determinations

IOSCO Requirements	
<p>The Administrator should describe and publish with each Benchmark determination, to the extent reasonable without delaying an Administrator publication deadline:</p> <ul style="list-style-type: none"> a) A concise explanation, sufficient to facilitate a Stakeholder’s or Market Authority’s ability to understand how the determination was developed, including, at a minimum, the size and liquidity of the market being assessed (meaning the number and volume of transactions submitted), the range and average volume and range and average of price, and indicative percentages of each type of market data that have been considered in a Benchmark determination; terms referring to the pricing Methodology should be included (i.e., transaction-based, spread-based or interpolated/extrapolated); b) A concise explanation of the extent to which and the basis upon which Expert Judgment if any, was used in establishing a Benchmark determination. 	
IDX’s Response:	RSM Procedures:
<p>IDX publishes the Index Guide and methodology documents which clearly describe the benchmark determination process, criteria, and calculations which are publicly available and accessible on IDX Website. The Index Guide and methodology provide sufficient transparency for stakeholders or market authorities to understand how the benchmark determination was developed. The Index Guide describes the extent of expert judgement used in establishing the Indices methodology.</p> <p>IDX benchmarks are selected and calculated directly from observable market prices and volumes which are transparently disseminated in real time through the exchange trading system and market data feeds enabling stakeholders and market authorities understand the benchmark determination process and enables them to assess market size, liquidity, price levels, and transaction ranges underlying the benchmark.</p> <p>In the event Expert Judgment is used due to exceptional circumstances (e.g., prolonged market disruption), the rules, rationale, and treatment are described in the Index Guide and supported by internal documentation to ensure clarity and auditability.</p>	<p>RSM reviewed publicly available documents, including the Index Guide, Factsheets, and methodology communications, to confirm transparency over benchmark determination.</p> <p>We evaluated IDX’s disclosures regarding input data sources, methodology features, rebalancing schedules, and conditions under which expert judgment may be applied.</p> <p>We cross-checked disclosures against internal documentation to ensure consistency and completeness.</p> <p>We also assessed whether IDX’s publication mechanisms ensure timely and accurate communication of benchmark changes.</p> <p>No exceptions were noted.</p>

5.10. Principle 10 – Periodic Review

IOSCO Requirements	
<p>The Administrator should periodically review the conditions in the underlying Interest that the Benchmark measures to determine whether the Interest has undergone structural changes that might require changes to the design of the Methodology. The Administrator also should periodically review whether the Interest has diminished or is non-functioning such that it can no longer function as the basis for a credible Benchmark.</p> <p>The Administrator should Publish or Make Available a summary of such reviews where material revisions have been made to a Benchmark, including the rationale for the revisions.</p>	
IDX's Response:	RSM Procedures:
<p>IDX periodically reviews whether the underlying market trend and conditions, liquidity characteristics, trading structure, and investor use of its benchmarks have undergone material changes that may require adjustments to index methodology design. This review is performed both through ongoing monitoring of market developments and through structured periodic reviews. Feedback from index licensees and stakeholders is also considered as part of this process to test the continued relevance of eligibility criteria and methodology elements.</p> <p>When a material methodology revision is adopted, IDX publishes a Methodology Change Statement on its website, disclosing the nature of the change, its rationale, the affected indices, and the effective date, thereby ensuring transparency of the benchmark design and methodology revisions.</p>	<p>RSM reviewed the Index Review Procedure, methodology review files, and periodic evaluation records to confirm how market conditions, liquidity patterns, and constituent performance were periodically assessed.</p> <p>We inspected records of methodology change proposals, committee approvals, and stakeholder notifications.</p> <p>We also reviewed public announcements to verify that changes were communicated with appropriate clarity and advance notice.</p> <p>No exceptions were noted.</p>

5.11. Principle 11 – Content of the Methodology

IOSCO Requirements

The Administrator should document and Publish or Make Available the Methodology used to make Benchmark determinations. The Administrator should provide the rationale for adopting a particular Methodology. The Published Methodology should provide sufficient detail to allow Stakeholders to understand how the Benchmark is derived and to assess its representativeness, its relevance to particular Stakeholders, and its appropriateness as a reference for financial instruments.

At a minimum, the Methodology should contain:

- a) Definitions of key terms;
- b) All criteria and procedures used to develop the Benchmark, including input selection, the mix of inputs used to derive the Benchmark, the guidelines that control the exercise of Expert Judgment by the Administrator, priority given to certain data types, minimum data needed to determine a Benchmark, and any models or extrapolation methods;
- c) Procedures and practices designed to promote consistency in the exercise of Expert Judgment between Benchmark determinations;
- d) The procedures which govern Benchmark determination in periods of market stress or disruption, or periods where data sources may be absent (e.g., theoretical estimation models);
- e) The procedures for dealing with error reports, including when a revision of a Benchmark would be applicable;
- f) Information regarding the frequency for internal reviews and approvals of the Methodology. Where applicable, the Published Methodologies should also include information regarding the procedures and frequency for external review of the Methodology;
- g) The circumstances and procedures under which the Administrator will consult with Stakeholders, as appropriate; and
- h) The identification of potential limitations of a Benchmark, including its operation in illiquid or fragmented markets and the possible concentration of inputs.

Where a Benchmark is based on Submissions, the additional Principle also applies:

The Administrator should clearly establish criteria for including and excluding Submitters. The criteria should consider any issues arising from the location of the Submitter, if in a different jurisdiction to the Administrator. These criteria should be available to any relevant Regulatory Authorities, if any, and Published or Made Available to Stakeholders. Any provisions related to changes in composition, including notice periods should be made clear.

IDX's Response:

The published IDX index methodology documents highlight IDX's rationale behind the methodology and calculation for each index. Key terms are defined in the index fact sheets made available on the IDX website. The index methodologies within the Index Guide sets out all criterias and procedures including eligibility requirements, weightings, and calculations used for the determination of the benchmarks. The

RSM Procedures:

RSM inspected methodology documents describing the construction, maintenance, calculation, and rebalancing rules for each index.

IOSCO Requirements

methodologies provide stakeholders with sufficient information to understand the determination of the benchmarks and their relevance as financial measurement instruments.

Where expert judgment is applied through the IDX Index Committee, it is considered an integral part of the benchmark determination process. All related analyses and rationale are transparently disclosed within the Index Guide. In accordance with the Index Committee Charter, matters not expressly regulated elsewhere remain validly governed by the Charter. Methodology changes are published on IDX's website, and relevant stakeholders are notified directly together with an explanation of the potential implications from the changes.

IDX index methodologies are reviewed on a regular basis, as required by the Index Committee Charter, to ensure the benchmarks continue to meet their stated objectives. For significant or necessary changes, IDX is required to conduct public consultation and actively engages both the public and index licensees to gather feedback prior to adoption.

IDX index operational procedures for identifying and managing potential limitations or special circumstances are documented in the IDX Indices Standard of Procedures, which provides the framework for consistent and controlled index administration which includes:

- Defined procedures for benchmark determination during market stress, trading suspensions, or data unavailability.
- Procedures for handling identified errors, including when revisions are permitted and how they are communicated, are documented in the Index Guide and IDX Indices SOP.

IDX80, LQ45 and IDX30 indices are calculated solely from exchange-traded market data and do not rely on Submitter-based contributions, therefore, the submitter-related provisions of Principle 11 do not apply

We reviewed how constituent eligibility criteria, formula calculations and special circumstances were documented.

Through walkthroughs, we confirmed that methodology content was communicated consistently across internal and public materials.

We also examined whether supporting documentation was maintained in a manner that satisfies completeness expectations.

No exceptions were noted.

5.12. Principle 12 – Changes to the Methodology

IOSCO Requirements	
<p>An Administrator should Publish or Make Available the rationale of any proposed material change in its Methodology, and procedures for making such changes. These procedures should clearly define what constitutes a material change, and the method and timing for consulting or notifying Subscribers (and other Stakeholders where appropriate, taking into account the breadth and depth of the Benchmark’s use) of changes.</p> <p>Those procedures should be consistent with the overriding objective that an Administrator must ensure the continued integrity of its Benchmark determinations. When changes are proposed, the Administrator should specify exactly what these changes entail and when they are intended to apply.</p> <p>The Administrator should specify how changes to the Methodology will be scrutinised, by the oversight function.</p> <p>The Administrator should develop Stakeholder consultation procedures in relation to changes to the Methodology that are deemed material by the oversight function, and that are appropriate and proportionate to the breadth and depth of the Benchmark’s use and the nature of the Stakeholders. Procedures should:</p> <ul style="list-style-type: none"> a) Provide advance notice and a clear timeframe that gives Stakeholders sufficient opportunity to analyse and comment on the impact of such proposed material changes, having regard to the Administrator’s assessment of the overall circumstances; and b) Provide for Stakeholders’ summary comments, and the Administrator’s summary response to those comments, to be made accessible to all Stakeholders after any given consultation period, except where the commenter has requested confidentiality. 	
IDX’s Response:	RSM Procedures:
<p>Any material changes to index methodology are publicly published and communicated to relevant stakeholders through IDX announcements. The definition of what constitutes a material change and the procedures for methodology amendments are set out in the formal Index Methodology Change Policy. Before material changes are adopted, IDX conducts a stakeholder consultation process within a predefined consultation window, allowing index licensees and other relevant stakeholders to review and comment on the proposed changes and their potential impacts.</p> <p>All proposed changes are reviewed by the Index Committee as the oversight function to ensure that any revisions are consistent with the objective of preserving benchmark integrity. Upon approval, the effective date, rationale, and implementation procedures are disclosed in accordance with index governance documentation maintained by the IDX Index Management Division.</p>	<p>RSM reviewed methodology change governance procedures, past change records, internal approval workflows, and public announcements.</p> <p>We conducted walkthroughs to understand how changes were evaluated, justified, reviewed, and escalated.</p> <p>We inspected documentation supporting at least one methodology change cycle to assess completeness of governance steps. We also verified that stakeholders were notified of material changes within appropriate timelines.</p> <p>No exceptions were noted.</p>

5.13. Principle 13 – Transition

IOSCO Requirements

Administrators should have clear written policies and procedures, to address the need for possible cessation of a Benchmark, due to market structure change, product definition change, or any other condition which makes the Benchmark no longer representative of its intended Interest. These policies and procedures should be proportionate to the estimated breadth and depth of contracts and financial instruments that reference a Benchmark and the economic and financial stability impact that might result from the cessation of the Benchmark. The Administrator should take into account the views of Stakeholders and any relevant Regulatory and National Authorities in determining what policies and procedures are appropriate for a particular Benchmark.

These written policies and procedures should be Published or Made Available to all Stakeholders.

Administrators should encourage Subscribers and other Stakeholders who have financial instruments that reference a Benchmark to take steps to make sure that:

- a) Contracts or other financial instruments that reference a Benchmark, have robust fall-back provisions in the event of material changes to, or cessation of, the referenced Benchmark; and
- b) Stakeholders are aware of the possibility that various factors, including external factors beyond the control of the Administrator, might necessitate material changes to a Benchmark.

Administrators' written policies and procedures to address the possibility of Benchmark cessation could include the following factors, if determined to be reasonable and appropriate by the Administrator:

- a) Criteria to guide the selection of a credible, alternative Benchmark such as, but not limited to, criteria that seek to match to the extent practicable the existing Benchmark's characteristics (e.g., credit quality, maturities and liquidity of the alternative market), differentials between Benchmarks, the extent to which an alternative Benchmark meets the asset/liability needs of Stakeholders, whether the revised Benchmark is investable, the availability of transparent transaction data, the impact on Stakeholders and impact of existing legislation;
- b) The practicality of maintaining parallel Benchmarks (e.g., where feasible, maintain the existing Benchmark for a defined period of time to permit existing contracts and financial instruments to mature and publish a new Benchmark) in order to accommodate an orderly transition to a new Benchmark.
- c) The procedures that the Administrator would follow in the event that a suitable alternative cannot be identified.
- d) In the case of a Benchmark or a tenor of a Benchmark that will be discontinued completely, the policy defining the period of time in which the Benchmark will continue to be produced in order to permit existing contracts to migrate to an alternative Benchmark if necessary; and
- e) The process by which the Administrator will engage Stakeholders and relevant Market and National Authorities, as appropriate, in the process for selecting and moving towards an alternative Benchmark, including the timeframe for any such action commensurate with the tenors of the financial instruments referencing the Benchmarks and the adequacy of notice that will be provided to Stakeholders.

IDX's Response:

RSM Procedures:

IOSCO Requirements

IDX Index Cessation Policy which is accessible for public on the website, which sets out:

- a) the conditions under which an index may be discontinued, including changes in product definition, or circumstances where the benchmark no longer represents its intended interest.,
- b) defines procedures, governance review steps, timelines, and stakeholder consultation and communication requirements to ensure an orderly transition, and

engagement with relevant authorities and adequate advance notice are also built into the process, ensuring that any transition preserves market integrity and financial stability.

RSM reviewed contingency and transition documentation outlining procedures for methodology evolution or potential benchmark cessation.

Walkthroughs confirmed that transition considerations were incorporated into governance decision-making.

We assessed the clarity of published transition guidelines and communication templates.

We evaluated whether internal procedures support orderly transition planning.

No exceptions were noted.

5.14. Principle 14 – Submitter Code of Conduct

IOSCO Requirements

Where a Benchmark is based on Submissions, the following additional Principle also applies:

The Administrator should develop guidelines for Submitters (“Submitter Code of Conduct”), which should be available to any relevant Regulatory Authorities, if any and Published or Made Available to Stakeholders. The Administrator should only use inputs or Submissions from entities which adhere to the Submitter Code of Conduct and the Administrator should appropriately monitor and record adherence from Submitters.

The Administrator should require Submitters to confirm adherence to the Submitter Code of Conduct annually and whenever a change to the Submitter Code of Conduct has occurred. 26 The Administrator’s oversight function should be responsible for the continuing review and oversight of the Submitter Code of Conduct.

The Administrator’s oversight function should be responsible for the continuing review and oversight of the Submitter Code of Conduct.

The Submitter Code of Conduct should address:

- a) The selection of inputs;
- b) Who may submit data and information to the Administrator;

IOSCO Requirements

- c) Quality control procedures to verify the identity of a Submitter and any employee(s) of a Submitter who report(s) data or information and the authorization of such person(s) to report market data on behalf of a Submitter;
- d) Criteria applied to employees of a Submitter who are permitted to submit data or information to an Administrator on behalf of a Submitter;
- e) Policies to discourage the interim withdrawal of Submitters from surveys or Panels;
- f) Policies to encourage Submitters to submit all relevant data; and
- g) The Submitters' internal systems and controls, which should include:
 - i. Procedures for submitting inputs, including Methodologies to determine the type of eligible inputs, in line with the Administrator's Methodologies;
 - ii. Procedures to detect and evaluate suspicious inputs or transactions, including inter- group transactions, and to ensure the Bona Fide nature of such inputs, where appropriate;
 - iii. Policies guiding and detailing the use of Expert Judgment, including documentation requirements;
 - iv. Record keeping policies;
 - v. Pre-Submission validation of inputs, and procedures for multiple reviews by senior staff to check inputs;
 - vi. Training, including training with respect to any relevant regulation (covering Benchmark regulation or any market abuse regime);
 - vii. Suspicious Submission reporting;
 - viii. Roles and responsibilities of key personnel and accountability lines;
 - ix. Internal sign off procedures by management for submitting inputs;
 - x. Whistle blowing policies (in line with Principle 4); and
 - xi. Conflicts of interest procedures and policies, including prohibitions on the Submission of data from Front Office Functions unless the Administrator is satisfied that there are adequate internal oversight and verification procedures for Front Office Function Submissions of data to an Administrator (including safeguards and supervision to address possible conflicts of interests as per paragraphs (v) and (ix) above), the physical separation of employees and reporting lines where appropriate, the consideration of how to identify, disclose, manage, mitigate and avoid existing or potential incentives to manipulate or otherwise influence data inputs (whether or not in order to influence the Benchmark levels), including, without limitation, through appropriate remuneration policies and by effectively addressing conflicts of interest which may exist between the Submitter's Submission activities (including all staff who perform or otherwise participate in Benchmark Submission responsibilities), and any other business of the Submitter or of any of its affiliates or any of their respective clients or customers.

IDX's Response:

IDX benchmarks are calculated solely from transactional data sourced from the regulated exchange trading system and do not rely on Submitter-provided inputs. As there are no external Submitters involved in the benchmark determination process, the requirements under Principle 14 regarding a Submitter Code of Conduct are not applicable to IDX indices, including IDX80, LQ45, and IDX30.

RSM Procedures:

RSM reviewed benchmark input workflows and confirmed through walkthroughs that no external submitters contribute non-transactional inputs for IDX30, LQ45, or IDX80.

We inspected documentation to confirm that all benchmark inputs are sourced automatically from IDX's regulated market.

IOSCO Requirements	
	<p>As this principle applies only where contributors provide submissions, we determined that it is not applicable for the indices in scope.</p> <p>Accordingly, no exceptions were assessed.</p>

5.15. Principle 15 – Internal Control over Data Collection

IOSCO Requirements	
<p>When an Administrator collects data from any external source the Administrator should ensure that there are appropriate internal controls over its data collection and transmission processes. These controls should address the process for selecting the source, collecting the data and protecting the integrity and confidentiality of the data. Where Administrators receive data from employees of the Front Office Function, the Administrator should seek corroborating data from other sources.</p>	
IDX's Response:	RSM Procedures:
<p>For IDX80, LQ45 and IDX30 indices, constituent selection and index calculation are based solely on internal IDX market data (e.g., traded prices) and do not rely on external submissions or third-party feeds. For indices that require company-level fundamentals, the data is sourced through the internal listed company disclosure submission platform. For indices administered by third parties for data collection or calculation, governance and controls follow the provisions described under Principle 2.</p> <p>To ensure internal control over data collection and transmission, the IDX Index Management Team applies formal procedures including secure data transfer protocols, mandatory password renewal, employee exit controls, segregation of duties, and maintains a full disaster recovery infrastructure. These safeguards ensure data integrity, confidentiality, and continuity. IDX does not receive benchmark inputs from front-office personnel; therefore, the corroboration requirement under Principle 15 is not applicable.</p>	<p>RSM reviewed data extraction protocols, system access controls, audit logs, and SOPs governing data integrity.</p> <p>We conducted system walkthroughs to assess how raw market data is captured, validated, and transferred into the benchmark calculation environment.</p> <p>We inspected evidence of periodic reconciliations and approval steps.</p> <p>We also evaluated controls designed to prevent manipulation, override, or unauthorized adjustments to input data.</p> <p>As this principle applies only where the Administrator collects data from any external source, we concluded this principle is deemed not applicable.</p>

IOSCO Requirements

Accordingly, no exceptions or deviations were assessed.

No exceptions were noted.

5.16. Principle 16 – Complaints Procedure

IOSCO Requirements

The Administrator should establish and Publish or Make Available a written complaints procedures policy, by which Stakeholders may submit complaints including concerning whether a specific Benchmark determination is representative of the underlying Interest it seeks to measure, applications of the Methodology in relation to a specific Benchmark determination(s) and other Administrator decisions in relation to a Benchmark determination.

The complaints procedures policy should:

- a) Permit complaints to be submitted through a user-friendly complaints process such as an electronic Submission process.
- b) Contain procedures for receiving and investigating a complaint made about the Administrator's Benchmark determination process on a timely and fair basis by personnel who are independent of any personnel who may be or may have been involved in the subject of the complaint, advising the complainant and other relevant parties of the outcome of its investigation within a reasonable period and retaining all records concerning complaints;
- c) Contain a process for escalating complaints, as appropriate, to the Administrator's governance body; and
- d) Require all documents relating to a complaint, including those submitted by the complainant as well as the Administrator's own record, to be retained for a minimum of five years, subject to applicable national legal or regulatory requirements.

Disputes about a Benchmarking determination, which are not formal complaints, should be resolved by the Administrator by reference to its standard appropriate procedures. If a complaint results in a change in a Benchmark determination, that should be Published or Made Available to Subscribers and Published or Made Available to Stakeholders as soon as possible as set out in the Methodology.

IDX's Response:

RSM Procedures:

IOSCO Requirements

IDX Complaint and Inquiry Policy for IDX Indices outlines the mechanisms through which stakeholders may submit and resolve complaints related to benchmark determinations, methodology application, or other index governance matters, as reflected in the following:

- a) IDX Complaint and Inquiry Policy for IDX Indices provides stakeholders with a clear, accessible, and electronic mechanism to submit complaints related to benchmark determinations, methodology application, or other index governance matters. Complaints may be submitted through a dedicated web form or via the IDX Contact Centre, ensuring a user-friendly submission channel.
- b) All submissions receive acknowledgment and undergo an initial review within five trading days, and a full response or status update is provided within 15 trading days, or with notice if additional time is required. Investigations are conducted by index management personnel who are independent from any individuals involved in the subject of the complaint. All complaint-related documents are retained for a minimum of five years in accordance with the IDX Internal Document Retention Policy.
- c) Cases are escalated to the appropriate governance body, including the Index Committee, when required by the nature of the matter.
- d) All documents relating to a complaint, including those submitted by the complainant as well as the Administrator's own records, are retained for a minimum of five years.

Matters that do not qualify as formal complaints are resolved using standard index operational procedures. If a complaint results in a material change to a benchmark determination or methodology, such changes are disclosed to index licensees and other stakeholders through a public announcement.

RSM reviewed IDX's complaints handling policy, escalation procedures, and communication channels.

We inspected supporting records of complaint logs maintained for index-related inquiries. Walkthroughs confirmed roles and responsibilities for receiving, assessing, and responding to complaints.

We assessed whether available channels and processes meet IOSCO expectations for transparency and accessibility.

No exceptions were noted.

5.17. Principle 17 - Audits

IOSCO Requirements

The Administrator should appoint an independent internal or external auditor with appropriate experience and capability to periodically review and report on the Administrator's adherence to its stated criteria and with the principles. The frequency of audits should be proportionate to the size and complexity of the Administrator's operations.

Where appropriate to the level of existing or potential conflicts of interest identified by the Administrator (except for Benchmarks that are otherwise regulated or supervised by a National Authority other than a relevant Regulatory Authority), an Administrator should appoint an independent external auditor with appropriate experience and capability to periodically review and report on the Administrator's adherence to its stated Methodology. The frequency of audits

IOSCO Requirements	
should be proportionate to the size and complexity of the Administrator's Benchmark operations and the breadth and depth of Benchmark use by Stakeholders.	
IDX's Response:	RSM Procedures:
IDX has engaged RSM as an independent external assurance firm with recognized expertise in benchmark assurance to conduct a periodic reasonable assurance examination of IDX's adherence to the IOSCO Principles and to the stated index methodologies. The IDX intends to continue engaging an external independent external assurance firm on a recurring basis at a frequency proportionate to the scale and complexity of IDX's benchmark operations and to the breadth of market use of its indices.	RSM reviewed the engagement letter and related appointment documentation as evidence that IDX has appointed an independent external assurance firm (RSM) to perform the external assurance engagement. No exceptions were noted.

5.18. Principle 18 – Audit Trail

IOSCO Requirements
<p>Written records should be retained by the Administrator for five years, subject to applicable national legal or regulatory requirements on:</p> <ul style="list-style-type: none"> a) All market data, Submissions and any other data and information sources relied upon for Benchmark determination. b) The exercise of Expert Judgment made by the Administrator in reaching a Benchmark determination. c) Other changes in or deviations from standard procedures and Methodologies, including those made during periods of market stress or disruption; d) The identity of each person involved in producing a Benchmark determination; and e) Any queries and responses relating to data inputs. <p>If these records are held by a Regulated Market or Exchange the Administrator may rely on these records for compliance with this Principle, subject to appropriate written record sharing agreements.</p> <p>When a Benchmark is based on Submissions, the following additional Principle also applies:</p> <p>Submitters should retain records for five years subject to applicable national legal or regulatory requirements on:</p> <ul style="list-style-type: none"> a) The procedures and Methodologies governing the Submission of inputs; b) The identity of any other person who submitted or otherwise generated any of the data or information provided to the Administrator; c) Names and roles of individuals responsible for Submission and Submission oversight; d) Relevant communications between submitting parties; e) Any interaction with the Administrator; f) Any queries received regarding data or information provided to the Administrator;

IOSCO Requirements

- g) Declaration of any conflicts of interests and aggregate exposures to Benchmark related instruments;
- h) Exposures of individual traders/desks to Benchmark related instruments in order to facilitate audits and investigations; and
- i) Findings of external/internal audits, when available, related to Benchmark Submission remedial actions and progress in implementing them.

IDX's Response:

IDX maintains a comprehensive audit trail covering all information relevant to benchmark determination, including:

- a) market data used for index calculation and periodic constituent reviews,
- b) records of analysis and any exercise of expert judgment, including committee recommendations and methodology change logs,
- c) internal approvals related to index construction and methodology revisions,
- d) documented organizational structure that clearly identifies the individuals and functions involved in each stage of the benchmark determination process, ensuring traceability, accountability, and auditability, and
- e) all inquiries and responses related to index data inputs or methodology application are documented and retained as part of the audit trail.

Index calculation outputs generated by the IDX index system are retained in the database for a minimum of 5 (five) years in accordance with the IDX internal Document Retention Policy.

Access to audit trail records is controlled to ensure confidentiality and integrity, and such records are available for regulatory or assurance review when required.

As IDX benchmarks are calculated using data from a regulated exchange, IDX may rely on those regulated market records to meet audit trail requirements. IDX does not use Submitter-based inputs for benchmark determination on IDX80, LQ45 and IDX30 indices, therefore, the additional record-keeping provisions relating to Submitter obligations under Principle 18 do not apply.

RSM Procedures:

RSM assessed the sufficiency of IDX's audit trail documentation by reviewing calculation files, version histories, system logs, meeting records, and constituent selection records.

We conducted walkthroughs to understand how data lineage, decision-making, and approval steps are recorded.

We verified that documents were retained in accordance with IDX's record-keeping policies.

No exceptions were noted.

5.19. Principle 19 – Cooperation with Regulatory Authorities

IOSCO Requirements	
<p>Relevant documents, Audit Trails and other documents subject to these Principles shall be made readily available by the relevant parties to the relevant Regulatory Authorities in carrying out their regulatory or supervisory duties and handed over promptly upon request.</p>	
IDX's Response:	RSM Procedures:
<p>IDX cooperates fully with relevant regulatory authorities in the performance of their supervisory duties. Upon request from the Indonesian Financial Services Authority (OJK) or any other competent regulatory authority, IDX will make available without delay all relevant documents, audit trails, and records maintained under these Principles to the extent permitted by applicable laws and regulations.</p>	<p>RSM reviewed correspondence logs, regulatory submission procedures, and evidence of cooperation with OJK and other authorities.</p> <p>Walkthroughs confirmed IDX's protocols for handling regulatory inquiries and examinations.</p> <p>We assessed whether processes for responding to regulators are documented, timely, and consistent with IOSCO expectations.</p> <p>No exceptions were noted.</p>