

VDKi considers the proposed changes to be generally reasonable. However, especially regarding timing we would like to ask you to be consulted sooner in similar cases, so that the market participants represented by VDKi can prepare themselves in good time and, if necessary, also present requests for change. Furthermore, we would like to ask you for an explanation how the index moves over – incl. a communication and timing schedule.

Moreover, we'd like to mention that in underlying contracts at exchanges in the futures market there are currently positions until 2023. To modify underlying specifications of existing exchange contracts during their lifetime might be problematic.

Best regards,

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- Managing Director –



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