

## **ORNN DATA LLC**

### **STATEMENT OF COMPLIANCE WITH THE IOSCO PRINCIPLES FOR FINANCIAL BENCHMARKS**

Effective Date: May 29, 2026

#### **1. Statement**

Ornn Data LLC, a Delaware limited liability company, makes this statement with respect to its administration of the Ornn Compute Price Indices, commonly referred to as OCPI. Based on the policies, procedures, controls, methodology, and records described in this statement, Ornn Data LLC states that it has designed and operates its benchmark administration program in alignment with the IOSCO Principles for Financial Benchmarks, Final Report FR07/13, July 2013.

This statement is a management statement of compliance. It is not a certificate issued by IOSCO, an approval by any regulator, or an independent third-party assurance report. As of the effective date of this statement, Ornn Data LLC has not received an independent third-party auditor's assurance report on this statement. Ornn Data LLC expects this statement and the underlying controls to be made available for independent review in connection with exchange, licensee, auditor, regulatory, or other diligence requests.

#### **2. Benchmark Administrator**

Ornn Data LLC is the benchmark administrator and data publisher for the OCPI suite. Ornn Data LLC is a wholly-owned subsidiary of Ornn AI Inc. The principal business address listed in Ornn's diligence materials is 447 Broadway FL 4, New York, NY 10013, United States, and the registered address listed in those materials is 263 Newbury St Apt 2, Boston, MA 02116, United States.

Ornn Data LLC is not, by this statement, representing that it is registered or licensed as a bank, broker-dealer, futures commission merchant, swap dealer, exchange, clearing organization, investment adviser, or other regulated financial institution. Ornn Data LLC operates as a benchmark administrator and data publisher for GPU compute price benchmarks.

#### **3. Benchmarks Covered**

This statement applies to the Ornn Compute Price Indices, including the headline OCPI series and related index extensions by GPU model, GPU generation, cluster size, contract tenor, configuration, and geography, to the extent each such series is administered under the OCPI methodology and related policies.

OCPI is a transaction-based price benchmark for GPU compute capacity. The index measures the market price of GPU compute in USD-equivalent per GPU-hour. The underlying input data consists of anonymized executed on-demand GPU rental transactions, including transactions executed on Ornn Exchange and off-venue transactions reported by contributing counterparties under written agreement.

The covered benchmark family includes, or may include, series for GPU generations and models such as A100, H100, H200, B200, RTX 5090, and RTX PRO 6000, as well as regional and configuration-specific series where sufficient eligible transaction data is available.

#### **4. Benchmark Objective and Methodology**

The objective of OCPI is to provide a transparent, rules-based, settlement-grade benchmark of the market price of GPU compute capacity per GPU-hour. The methodology is designed to reflect completed transactions rather than merely seller-posted offers, surveys, estimates, or unconsummated indications of interest.

For each relevant GPU type or index specification, Ornn collects eligible transaction observations over the applicable observation window. Each observation includes price, quantity, region, and GPU type. The methodology then computes empirical quantiles from eligible trades and fits a metalog distribution to those quantiles. The index value is calculated as the mean of the fitted metalog distribution and published as the applicable USD-equivalent price per GPU-hour.

The methodology is rules-based and deterministic in ordinary operation. Ornn does not apply day-to-day discretion to determine published index values. Limited discretion is reserved for documented methodology reviews, temporary exclusion of unreliable providers under data quality rules, invocation of fallback or indicative status when provider sufficiency thresholds are not met, and correction of material data or calculation errors.

#### **5. Governance and Oversight**

Ornn maintains governance arrangements intended to protect benchmark integrity, including management oversight, methodology governance, separation between commercial activity and index calculation, and escalation procedures for conflicts, incidents, complaints, and methodology changes.

Day-to-day operations are overseen by Ornn's senior management. Engineering owns the index publication and methodology research process. Operations manages provider relationships, control processes, compliance workflows, and incident handling. Methodology reviews are conducted with management and Ornn's Board of Advisors or other designated oversight participants.

Ornn maintains written policies and procedures that include a Code of Conduct and Ethics, Conflicts of Interest Policy, Personal Trading Policy, Data Privacy and Confidentiality Policy, Information Security Policy, Methodology Change Control process, Incident Management process, and Whistleblowing procedure. These policies are scaled to Ornn's current size and benchmark activities and are subject to periodic review.

#### **6. Conflicts of Interest**

Ornn's conflicts framework is designed to identify, disclose, escalate, manage, and, where necessary, eliminate conflicts that could impair benchmark integrity. The framework addresses conflicts involving benchmark personnel, commercial personnel, data contributors, licensees, affiliates, and any person with access to non-public index inputs or pre-publication values.

Personnel are prohibited from using non-public OCPI inputs, pre-publication values, or non-public methodology changes for investment decisions. Ornn's personal trading policy prohibits staff from trading in products whose settlement value references an Ornn index and from trading on non-public information relating to OCPI methodology, data sources, or values.

Access to production data and calculation systems is restricted by role. Material methodology and pipeline changes are subject to review, approval, and documentation. Any conflict affecting index integrity must be escalated to senior management and handled in accordance with Ornn's conflicts procedures.

## **7. Input Data Quality**

OCPI is based on anonymized executed-trade data. Ornn does not use generative artificial intelligence tools in the production, calculation, validation, or publication of OCPI values. The underlying data is not collected by web scraping, consumer browser plugins, mobile-device monitoring, expert networks, surveys, or calls with public companies.

Eligible input data is subject to data fidelity filters. These filters include verified counterparties, trade finality, minimum notional thresholds, provider reliability standards, and compute quality thresholds. Canceled, pending, partially matched, or otherwise incomplete transactions are excluded from the eligible data set.

Provider eligibility is monitored through operational thresholds and reliability metrics, including historical reliability, network performance, GPU memory, system memory, storage, CPU cores per GPU, PCIe bandwidth, and CUDA version. Providers with incomplete reporting, excessive latency, or other data quality deficiencies may be temporarily excluded until data quality is restored.

## **8. Data Contributor Controls**

Contributing counterparties report transaction data under written contribution agreements, trading rules, or other direct written terms. These arrangements are intended to confirm that the counterparty has the legal right to contribute transaction data, that contribution does not breach a contractual, fiduciary, confidentiality, or other duty, and that Ornn may use the contributed data to construct and license derived benchmark indices.

Counterparty onboarding includes diligence regarding legal rights, sanctions screening, beneficial ownership review where applicable, and review of relevant adverse events.

Counterparties that are subject to relevant regulatory action, public litigation, or known disputes regarding data collection practices may be excluded from contribution. Annual and event-driven recertification is required where applicable.

Ornn's data dictionary defines the fields accepted at the contribution interface. Accepted fields are designed to avoid natural-person identifiers and covered personal information. Counterparty information is limited to legal-entity information and operational fields needed for benchmark construction, validation, audit, and administration.

## **9. Data Sufficiency and Fallbacks**

Ornn monitors data sufficiency through internal dashboards and automated controls. The index methodology uses completed transaction data and includes fallback procedures for periods of data insufficiency, provider outage, stale provider feeds, or other operational disruption.

If provider availability or input data sufficiency falls below Ornn's minimum threshold, the affected index may be marked indicative. If the available data is not representative, Ornn may republish the last fully-informed value in accordance with the documented fallback procedure. Such events are logged with the cause, action taken, timing, and notification history.

Fallbacks are intended to preserve continuity without overstating the representativeness of a value produced under stressed conditions. Where a fallback or indicative value is used, Ornn retains supporting records and communicates material events to licensees in accordance with applicable contractual notice requirements.

## **10. Anomalous and Suspicious Data**

Ornn maintains automated and human controls for anomalous and suspicious data. Automated monitoring flags trades outside expected price ranges, sudden volume spikes from a provider or region, repeated identical prints that may indicate wash trading, unusual clustering at specific price points, and provider feed gaps or latency spikes.

Flagged trades are excluded automatically where they fail rule-based filters. Patterns not covered by automated rules may be reviewed manually by Ornn personnel independent of the activity under review. Where a print is determined to be non-representative, it is excluded under documented procedures.

All exclusions, overrides, and manual review outcomes are logged with a timestamp, reason code, and reviewer where applicable. These records form part of the audit trail for the affected benchmark calculation.

## **11. Calculation, Verification, and Publication**

All data aggregation, filtering, fitting, verification, and publication occur on Ornn's secure cloud-based analytics infrastructure. Ornn applies pre-publication checks for null values, missing values, large movements, interim measures, unchanged values, and other signals that may indicate a data or calculation issue.

Ornn runs its index computation infrastructure multiple times to verify that outputs are consistent across runs. Published values are verified before release, and calculation artifacts are retained as part of the benchmark record.

OCPI values are published daily at 16:00 Eastern Time, rounded to the nearest tenth of a cent, or \$0.001, unless a publication delay, fallback, error correction, or other documented event applies. Published index values may be disseminated through Ornn systems and third-party distribution channels made available to licensees and subscribers.

## **12. Methodology Changes and Recalculations**

Ornn documents methodology changes in versioned public releases of the OCPI methodology. Methodology changes are reviewed through Ornn's methodology governance process and are subject to notice to licensees where required by contract or applicable policy.

Historical recalculations are applied only where necessary to correct data errors or structural inconsistencies. Ornn does not recalculate historical values merely to reflect prospective methodology refinements.

Where a historical recalculation is required, Ornn documents the cause and scope of the change, recalculates affected index values on its analytics infrastructure with verification, notifies licensees in writing where commercially reasonable, republishes corrected values, and retains the recalculation record and justification as part of the audit trail.

## **13. Records and Audit Trail**

Ornn retains full trade-level data, intermediate calculation artifacts, published index values, methodology versions, methodology change records, exclusions, error corrections, complaints, incident records, and related benchmark administration records. Full trade-level data and intermediate calculation artifacts are retained for at least seven years on Ornn's secure analytics infrastructure, and published index values are retained indefinitely.

The audit trail includes all relevant data, submissions, other information, judgments, analyses, reason codes, reviewer identities where applicable, and calculation outputs needed to reconstruct and review a benchmark determination.

Records are maintained in secure cloud infrastructure with access controls, encryption in transit, encryption at rest, and logging of access to production data.

## **14. Complaints, Errors, and Incident Escalation**

Ornn maintains a formal complaints procedure. Complaints may be submitted in writing to Ornn's designated complaints or support contact. Each complaint is logged with a unique reference, acknowledged within five business days, and investigated by personnel independent of the activity complained of where reasonably practicable. Ornn aims to provide a substantive response within thirty days where reasonably practicable.

If Ornn becomes aware that incorrect input data or a calculation issue has materially affected a published index value, Ornn investigates promptly and follows the applicable error correction and historical recalculation process. Material errors and corrections are communicated to licensees in writing in accordance with the applicable notice protocol.

If a daily value fails to publish at the scheduled publication time, Ornn Engineering is alerted automatically. Ornn diagnoses the cause, resolves the issue where possible, invokes fallback or indicative status where necessary, logs the event, and notifies affected licensees according to the applicable contractual or operational escalation procedure.

## **15. Business Continuity and Cessation**

Ornn maintains a Business Continuity Plan and Disaster Recovery Plan covering the people, processes, and systems required to continue publishing the OCPI suite under stress scenarios. Ornn's analytics, calculation, and API infrastructure runs on enterprise cloud infrastructure with redundancy. Input data, published values, and calculation artifacts are replicated or otherwise protected through Ornn's data resilience controls.

Critical roles have documented backups, and no single individual is intended to be a single point of failure for index calculation, publication, or governance. In the event Ornn is unable to continue providing OCPI, Ornn will notify affected licensees and cooperate on an orderly transition, settlement, delisting, successor benchmark, or cessation process, subject to applicable contracts and confidentiality obligations.

## **16. Confidentiality, Privacy, and MNPI Controls**

Ornn treats non-public input trade data, licensee information, methodology implementation details, and pre-publication index values as confidential. Personnel are bound by confidentiality obligations in their employment or contractor agreements and by Ornn's Code of Conduct.

OCPI does not contain covered personal information and is not designed to collect natural-person identifiers. Contributing counterparties represent that submitted data is not material non-public information of an issuer of public securities and is not subject to confidentiality obligations that would prohibit contribution.

Ornn uses reasonable best efforts, including counterparty representations, onboarding diligence, sanctions screening, annual and event-driven recertification, and exclusion procedures, to confirm that data used to create OCPI was not obtained through breach of contract, breach of fiduciary duty, deception, misappropriation, or violation of law.

## **17. Limitations**

This statement describes Ornn's benchmark administration framework as of the effective date. It does not amend any license agreement, contribution agreement, trading rule, methodology document, or other binding contract. If this statement conflicts with a definitive written agreement or the operative methodology for a specific index series, the definitive written agreement or operative methodology controls.

This statement is not investment advice, legal advice, tax advice, accounting advice, or a recommendation to trade any futures contract, swap, option, security, or other financial instrument. Users should exercise independent judgment and consult their own advisers before relying on OCPI in contracts, trading, risk management, financial reporting, or regulatory submissions.