

# Statement Regarding the Regulatory Status and Eligibility of TORF under the Amended EU Benchmarks Regulation (EU BMR)

April 2026

QUICK Benchmarks Inc.

QUICK Benchmarks Inc. (hereinafter, "QBS") issues this statement regarding the legal status and eligibility of TORF (Tokyo Term Risk Free Rate) under the EU Benchmarks Regulation (Regulation (EU) 2016/1011), as amended by Regulation (EU) 2025/914 (hereinafter, the "Amended EU BMR"), which fully applies to third-country (non-EU) benchmarks from 1 January 2026.

Under the full application of this new regulatory framework, it is our understanding that EU users may continue to lawfully use TORF, without taking any additional procedures.

## 1. Confirmation of Regulatory Status and Eligibility

Under the Amended EU BMR, third-country benchmarks with a total reference value of less than EUR 50 billion within the EU are excluded from the mandatory scope of the regulation. Consequently, such benchmarks remain eligible for use by EU supervised entities without requiring registration, recognition, or endorsement by the European Securities and Markets Authority (ESMA).

Based on QBS's assessment using the Financial Instruments Reference Data System (FIRDS) managed by ESMA as of 3rd April 2026, the utilization of TORF within the EU is confirmed to be well below the "Significant Benchmark" threshold of EUR 50 billion. Furthermore, as of the same date, QBS has not received any notification from ESMA designating TORF as such based on qualitative aspects (e.g., lack of appropriate substitutes and significant adverse impact on financial stability in the EU in the event of its cessation).

FIRDS is a centralized mechanism established under Article 27 of the Markets in Financial Instruments Regulation (MiFIR) (Regulation (EU) No 600/2014), whereby

ESMA aggregates and publishes on its website the reference data for financial instruments submitted by trading venues and systematic internalisers (SIs) to national competent authorities.

Therefore, while TORF is not currently listed in the ESMA register, QBS understands that it remains fully eligible for continued lawful use by EU users in financial instruments and contracts under the provisions of the Amended EU BMR, without taking additional procedures.

## 2. Benchmark Robustness

- Although TORF falls outside the scope of mandatory EU registration, QBS maintains robust governance and quality standards comparable to global requirements. TORF is administered in compliance with the IOSCO Principles for Financial Benchmarks, and QBS is regulated and supervised by the Financial Services Agency of Japan (JFSA) as a "Specified Financial Benchmark Administrator" under the Financial Instruments and Exchange Act of Japan.
- Regulatory Alignment:  
QBS maintains close consultation with the JFSA and shares a common understanding regarding TORF's position under the new regulatory environment.

## 3. Future Actions and Monitoring

QBS will continue to closely monitor TORF usage levels and policy developments by EU regulatory authorities. Should TORF meet the criteria for a "Significant Benchmark" in the future due to increased usage within the EU, or should it be designated as such by ESMA, QBS is committed to taking the necessary steps promptly in consultation with the JFSA to ensure no disruption to our users' transactions.