

The difference of compliance between the FSB Report
and the JBA TIBOR Administration' s self-assessment (published on July 7, 2014)

	FSB Report (base date April 11)	JBATA' s initiatives since the FSB Report base date April 11	JBATA' s Self-assessment (base date July 4)
Principles 3 Conflicts of Interest for Administrators	<u>Partly</u> Implemented	Statements of whether the Board members and the Oversight Committee members have conflicts of interest were released on the JBATA's website on July 4, 2014, disclosing information on conflicts of interest.	<u>Broadly</u> Implemented
Principles 5 Internal Oversight	<u>Broadly</u> Implemented	The Oversight Committee carries out the monitoring of reference banks' compliance with the Code of Conduct and rate submissions.	<u>Fully</u> Implemented
Principle 8 Hierarchy of Data Inputs	<u>Broadly</u> Implemented	The Code of Conduct was amended on July 4, 2014 and newly stipulates in the data hierarchy clause that transactions shall be taken into account as a minimum requirement and be given priority if the transactions are observable.	<u>Fully</u> Implemented
Principle 12 Changes to the Methodology	<u>Broadly</u> Implemented	The Code of Conduct was amended on July 4, 2014 in accordance with the procedures that the Operational Rules sets out.	<u>Fully</u> Implemented
Principles 14 Submitter Code of Conduct	<u>Broadly</u> Implemented	JBATA received from reference banks their internal rules which are based on the Code of Conduct, completed a detailed review of these internal rules, and reported the results to the Oversight Committee.	<u>Fully</u> Implemented
Principle 16 Complaints Procedures	<u>Broadly</u> Implemented	Feedback and complaints in relation to JBA TIBOR are reported to the Oversight Committee and the appropriateness of its management is assessed.	<u>Fully</u> Implemented