



ICE CoT

INPUT DATA AND METHODOLOGY OVERVIEW

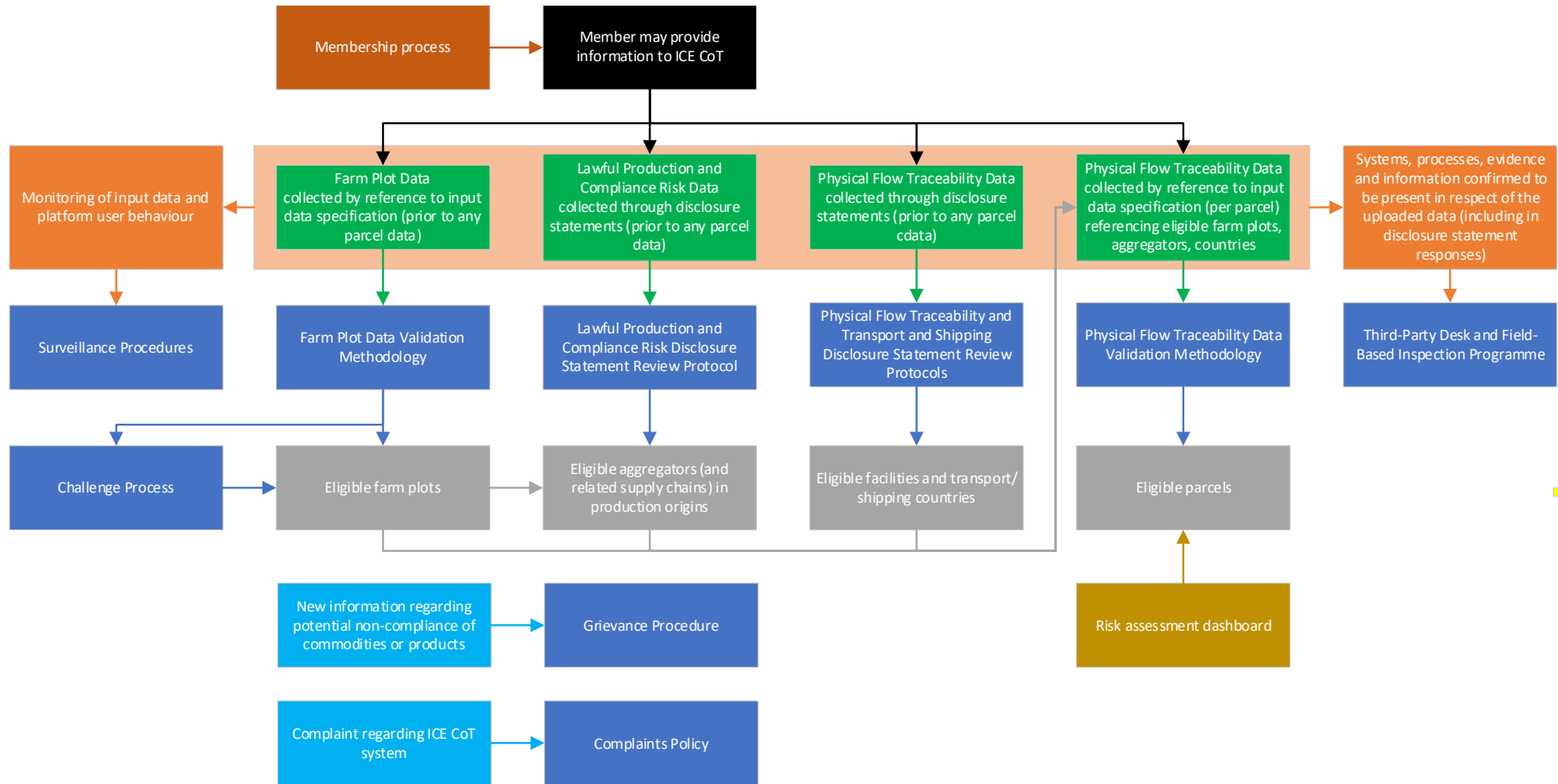
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1. ICE CoT INPUT DATA AND METHODOLOGY OVERVIEW

1.1 SCHEMATIC



1.2 INTRODUCTION

The ICE Commodity Traceability Service (“ICE CoT”) is a technology platform that supports traders and operators with their EU Deforestation Regulation (“EUDR”)¹ compliance obligations and the continued trade in compliant cocoa and coffee commodities and products in the EU. ICE CoT is operated and licensed by ICE Benchmark Administration Limited (“IBA”).

The platform supports the submission, storing, review, testing and sharing of due diligence information required under the EUDR, and helps users to demonstrate that cocoa and coffee and related products are ‘deforestation-free’ and ‘produced in accordance with the relevant legislation of the country of production’² when entering and supplied on the EU market.

There are three key categories of data uploaded by ICE CoT users which are reviewed and validated against the ICE CoT protocols and methodologies:

- **Farm Plot Data:** This is details of cocoa and coffee production farm plots, including their geo-location information. The data is collected and uploaded by reference to an input specification and tested against our **Farm Plot Data Validation Methodology**. The methodology was developed with Meridia and includes tests for deforestation and protected area overlaps using mapping data from Space Intelligence and protected area information obtained from the Integrated Biodiversity Assessment Tool (IBAT) with additional data provided by Meridia. Farm Plot Data can be uploaded and tested independently of any Physical Flow Traceability Data, ideally prior to the harvest and physical flow of commodities from the farm plots. It must be uploaded before any Physical Flow Traceability Data for any parcel of commodities or products referencing the farm plots and must be updated in the event of any changes.
- **Lawful Production and Compliance Risk Data:** This is details of aggregators and the systems and processes for these aggregators (and other entities along supply chains). This data relates to compliance with applicable legislation in a country of production and the mitigation of risks of non-compliance. The data is collected through disclosure statements and reviewed against our **Lawful Production and Compliance Risk Disclosure Statement Review Protocol**, each developed with the support of KPMG® Netherlands. The disclosure statements can be completed independently of any Physical Flow Traceability Data. They must be completed before uploading any Physical Flow Traceability Data for any parcel of commodities or products referencing the aggregators and must be updated in the event of any changes.
- **Physical Flow Traceability Data:** This is traceability information regarding commodities and products, linking them back to previously submitted farm plots and aggregators. Physical Flow Traceability Data includes details of aggregator supply, transport, shipping, warehousing and processing of commodities and products. Certain data in respect of any parcel of commodities and or products is collected and uploaded by reference to an input specification and tested against our **Physical Flow Traceability Data Validation Methodology**. Certain data regarding

¹ Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010, as amended.

² The terms ‘deforestation-free’ and ‘relevant legislation of the country of production’ are defined in the EUDR. Deforestation-free refers to land not subject to deforestation (conversion of forest to agricultural use) after 31 December 2020. Relevant legislation refers to laws applicable in the country of production concerning the legal status of the area of production in terms of: (a) land use rights; (b) environmental protection; (c) forest-related rules, including forest management and bio-diversity conservation, where directly related to wood harvesting; (d) third parties’ rights; (e) labour rights; (f) human rights protected under international law; (g) the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples; (h) tax, anti-corruption, trade and customs regulations.

facilities and transport/shipping and the systems and processes at related traceability control points is collected through disclosure statements and reviewed against our **Physical Flow Traceability and Transport and Shipping Disclosure Statement Data Review Protocols**. The disclosure statements can be completed independently of other traceability information. They must be completed before uploading any Physical Flow Traceability Data for any parcel of commodities or products referencing the control points and must be updated in the event of any changes.

All required Physical Flow Traceability Data must be uploaded when commodities or products are submitted on ICE CoT. This data may be supplemented as the relevant parcel moves through the supply chain, and is subject to further review and testing against the protocols and methodologies.

ICE CoT collects this data and conducts a series of reviews and tests in accordance with published protocols and methodologies. This supports users in tracing commodities, and commodities used to derive the products, submitted on ICE CoT back to farm plots which are free of deforestation, and to aggregators and supply chains with systems and processes to demonstrate that the commodities have been lawfully produced.

The methodologies include validation tests to check that the uploaded data is complete, reasonable and consistent, and for deforestation and protected area overlaps. The Lawful Production and Compliance Risk Disclosure Statements require confirmation that systems and processes are in place to support legal compliance and confirm appropriate mitigation. The Physical Flow Traceability and Transport and Shipping Disclosure Statements require confirmation that systems and processes are in place to support traceability. Disclosure Statement responses are reviewed to check the user has confirmed all required systems and processes are in place.

The systems, processes, evidence and information confirmed to be present in respect of the uploaded data (including in disclosure statement responses) are required to be available for inspection and verification on request under ICE CoT's independent **Data Inspection and Verification Programme**, which is being designed and implemented with the support of FLOCERT as independent field auditor for the ICE CoT platform.

A **Risk Assessment Dashboard** for each country includes additional information to support users in demonstrating risk assessments against specified criteria.

ICE CoT also benefits from:

- a **Membership Process** to review and approve prospective ICE CoT users;
- **Surveillance Procedures** to monitor input data and platform user behaviour;
- a **Challenge Process** for users to request a review of certain Farm Plot Data Validation Methodology outcomes;
- a **Grievance Procedure** to submit and address new information regarding risks of non-compliance of commodities and products on ICE CoT; and
- a **Complaints Policy**.

This **ICE CoT Input Data and Methodology Overview** is subject to review by the ICE CoT Advisory and Oversight Committee and approval by the Board of IBA.

1.3 FARM PLOT DATA UPLOAD

ICE CoT requires farm plot geolocation and related data to be uploaded by a user before uploading any Physical Flow Traceability Data for commodities, and products derived from commodities, produced on these farm plots. The uploaded farm plot data will be tested by ICE CoT against the Farm Plot Data Validation Methodology and test results will be returned to the user.

ICE CoT currently supports file upload in GeoJSON format, which is also the format currently required by the EU Information System for due diligence statement uploads.

Required Farm Plot Data includes:

- **ProducerCountry** - 2 letter country code from ISO 3166-1 alpha-2. For example, “CI” for Côte d’Ivoire or “BR” for Brazil. Must match one of the ICE CoT list of supported origin countries for each commodity.
- **Commodity** - “Coffee” or “Cocoa”.
- **CTOFarmerID** - A unique identifier for each farmer, assigned by the user. Multiple farm plots may be linked to the same farmer.
- **CTOPlotID** - A unique identifier for each farm plot, assigned by the user. This field should be unique for each given ProducerCountry and Commodity.
- **DateofMapping** - As details of a plot may change over time; this determines which version of the farm plot was current on a particular date.
- **Geometry** - Either a polygon defining the outline/border of the plot or a point indicating a physical location within the farm plot. If a point is specified, the farm plot area must also be specified. Plots over 4ha must be specified as polygons.
- **Area** - The area of the farm plot, in hectares. Where the geometry is a point, Area is required and must be no more than 4ha.
- **Variety** - For farm plot input data in respect of Coffee, a user must specify either “Arabica” or “Robusta”.
- **AggregatorIDs** - One or more Aggregator IDs referencing a separately uploaded list of Aggregators.

Optional data may also be added including **ProducerName**, **NationalFarmerID**, **NationalPlotID**, **DataProvider** (allows a user to indicate that Farm Plot Data comes from different data providers and so may include overlaps), and **ProductionPlace**.

Underlying information and documentation to evidence the uploaded data is required to be available for inspection and verification.

Farm Plot Data is not shared with a buyer or with other ICE CoT users except that: Geometry (plot polygon or geolocation point) is always shared with a buyer until due diligence statement creation, after which it is not required to be shared; other Farm Plot Data may be shared with a buyer at the seller’s option.

1.4 FARM PLOT DATA METHODOLOGY TESTS

Farm Plot Data is subject to several tests under the Farm Plot Data Validation Methodology, including basic data consistency and reasonability tests, and checks for deforestation and protected area proximity and overlaps. All required data fields must be supplied. Some Farm Plot Data tests (e.g. “Farm is extremely large”) have reasonability thresholds which may vary by country of production.

Where Farm Plot Data fails any test, that farm plot may not be identified as an eligible production plot in the Physical Flow Traceability Data for any commodities and products submitted on ICE CoT.

In case of upload errors, the data can be corrected and re-uploaded.

ICE CoT Farm Plot Data Validation Methodology test methods and thresholds are subject to continuous review and may be updated, removed or added to. Current tests as of the date of this document include:

Basic geometry tests for polygons:

- Farm has too few boundary vertices
- Farm has self-intersecting boundary segments
- Farm plot polygon contains holes
- Farm plot polygon is not closed

Deforestation, protected area and plot size tests:

- Farm overlaps with deforestation (conversion of forest to agricultural use after 31 December 2020) (based on data obtained from Space Intelligence®)
- Farm overlaps land detected as non-agricultural forest (based on data obtained from Space Intelligence®)
- Farm overlaps with protected area (based on data obtained from IBAT with additional data provided by Meridia)
- Farm plot is recorded as a geopoint with estimated size greater than 4ha
- Geopoint too close to deforestation

Reasonability tests:

- Farmer has implausibly high number of farms
- Farm plot is distant from farm plots with the same Farmer ID
- Farm plot mapping date is far in the past
- Farm plot overlaps with other farm plot(s)
- Farm plot is duplicated with same Farmer ID
- Farm plot is duplicated with different Farmer ID
- Farm plot has a very unusual shape
- Farm plot boundary has spikes
- Farm plot is extremely large
- Farm plot is extremely small
- Farm plot is outside of country boundary
- Farm plot overlaps built-up area
- Farm plot overlaps water body
- Farm plot location time-series mismatch
- Inconsistent farmer data

1.5 LAWFUL PRODUCTION AND COMPLIANCE RISK DATA

EUDR-compliant supply chains are expected to have in place internal management systems which include documented procedures and processes for aggregators and other entities along supply chains

to ensure and demonstrate compliance with applicable national laws and compliance risk mitigation requirements.

ICE CoT uses disclosure statements to collect and review information regarding these systems, procedures and processes as they relate to demonstrating: (i) that commodities, and commodities used to derive products, submitted on ICE CoT were lawfully produced; and (ii) as required, appropriate compliance risk mitigation was exercised. Two types of disclosure statements are used:

- the **Aggregator Systems Disclosure Statement** collects information regarding the list of aggregators and the types of internal management systems for aggregators and supply chains for each country of production, along with information regarding supply chain communication, grievances and compliance violations; and
- the **Lawful Production and Compliance Risk Disclosure Statements** require confirmation that these systems demonstrate compliance with the applicable legislation in each country of production for each specified legal topic and how remaining compliance risks are mitigated.

The Aggregator Systems Disclosure Statement is also used to collect and review traceability information regarding systems, procedures and processes to identify and confirm on which farm plots any commodities that were supplied by the aggregators were produced.

Underlying systems, information and documentation to evidence the responses to the disclosure statements must be available for inspection and verification.

Only aggregators (and related supply chains) with fully and satisfactorily completed disclosure statements are eligible to be identified in the Physical Flow Traceability Data for any commodities or products submitted on ICE CoT.

- **Aggregator Systems Disclosure Statement**

The Aggregator Systems Disclosure Statement is a standardised disclosure statement which collects information regarding systems and processes in place for aggregators and related supply chains, including:

- Identification of aggregators (including **AggregatorID, Aggregator Name and Address, Aggregator Geo-point, Country, Commodity**) collected via an **Aggregator File**
- Internal management system information (**IMS Category, Date of Most Recent Audit, Availability of Underlying IMS Information**) collected via an Aggregator File
- Information regarding communication of EUDR requirements
- Information regarding grievance mechanisms
- Information regarding complaints, compliance breaches and legal proceedings

The disclosure statement also requires confirmation that the internal management systems collect information to demonstrate that each parcel supplied by an aggregator contains only commodities produced on some or all the farm plots associated with such aggregator and parcel, and no other farm plots.

The disclosure statement requires confirmation that the user can provide access to and evidence of such systems and processes (including all applicable underlying data and documents).

- **Lawful Production and Compliance Risk Disclosure Statements**

Each Lawful Production and Compliance Risk Disclosure Statement is a standardised disclosure statement which collects information regarding systems and processes in place for aggregators and related supply chains to ensure and demonstrate compliance with applicable laws in each country of production for each legal topic, including:

- are systems and processes are in place to collect information to demonstrate compliance, and assess risks of non-compliance, with such laws, including laws listed in the **Lawful Production Annex** for the country of production and each legal topic
- are appropriate measures in place to mitigate residual risks of non-compliance with such laws, including measures listed in the **Mitigation Annex** for the applicable legal topic
- are systems, processes and measures in place to collect information and assess and mitigate risks regarding infringing the rights of indigenous peoples within the supply chain

The disclosure statements require confirmation that the user can provide access to and evidence of such systems and processes and any applicable mitigation measures (including all applicable underlying data and documents).

Applicable legal topics include land use rights, environmental protection, third-party rights and Free, Prior, and Informed Consent (FPIC), labour and human rights, and tax, anti-corruption, trade, and customs regulations.

The laws listed for each legal topic in the Lawful Production Annex for each country of production and the measures listed in the Mitigation Annex for each legal topic have been identified through local legal and sustainability expert reviews.

A shorter, **Lawful and Compliance Risk Disclosure Statement (Tax, Anti-corruption, Trade and Customs Regulations)** is available for ICE CoT users which intend to submit traceability information for any commodities or products related to part of a supply chain in the country of production where an Aggregator Systems Disclosure Statement and a Lawful Production and Compliance Risk Disclosure Statement have already been completed in respect of the aggregators where the commodities, or commodities used to derive products, were sourced. This disclosure statement collects information regarding the systems and processes in place for the applicable steps in the supply chain to ensure and demonstrate compliance with applicable legislation in each country of production in terms of tax, anti-corruption, trade and customs regulations.

If a user does not confirm systems and processes are in place for each specified legal topic and for risks of infringing the rights of indigenous peoples, and that required mitigation measures have been adopted, the aggregators and their related supply chains are not eligible to be identified in the Physical Flow Traceability Data for any commodities or products submitted on ICE CoT.

1.6 PHYSICAL FLOW TRACEABILITY DATA UPLOAD

ICE CoT requires traceability information to be uploaded for the physical supply chain for commodities and products by reference to specified “events”, starting with the initial supply of commodities by an aggregator (and the identified farm plots where the commodities were produced), through any transport, storage, processing and shipping. Data relating to any commodities and products may be uploaded at any point in the supply chain after the commodities have been supplied by an aggregator.

Each specified quantity of a single type of physical commodity or product (e.g. cocoa beans, cocoa butter, coffee beans) at an event is identified as a “parcel” of such commodity or product in ICE CoT. The required Physical Flow Traceability Data traces commodities and products through the physical supply chain (a “traceability tree”), starting with the initial parcels supplied by the aggregators from which the relevant commodities were sourced through to the current, “active parcels” based on the most recent events in the traceability data for those commodities and products.

For any parcels to be accepted on ICE CoT, the required traceability data must have been uploaded and have satisfied the review protocols and validation methodologies.

A user of ICE CoT registered as a holder of an active parcel may use ICE CoT to create a due diligence statement in respect of such parcel, or request that another user is registered as the holder of such parcel by transferring it.

The event types supported by ICE CoT include:

- **CreateParcel** – Sourcing of a parcel, usually from an aggregator. The start of every traceability tree, this provides the direct link to a list of eligible farmers identified pursuant to the farm plot data upload and the Farm Plot Data Methodology tests. Every subsequent event ultimately links back to one or more initial CreateParcel events
- **Transport** – Movement of parcels, for example by truck
- **Warehousing** – Storage of parcels at a warehouse or other facility
- **Operation** – Specified action carried out on one or more parcels. For example, washing, processing cocoa beans into liquor, butter or powder, milling, grading or roasting at a factory, the splitting or merging of parcels, and any ownership changes that occur independently of other events such as Transport events or Shipping events. ICE CoT supports continuous processing of commodities and products
- **Shipping** – Movement of product between countries (whether by sea, land or air) associated with a bill of lading document. For the Shipping event, it is a requirement to upload selected details from, and a scanned copy of, the bill of lading document

Every event in the traceability tree for commodities and products must be identified by a numeric Event ID, which determines the sequence in which events occurred. Events have lists of inputs and/or outputs defining the commodity or product acted on or produced by the event. The weight of each parcel must be known at every stage in the supply chain.

The set of data to be provided for each event in a traceability tree includes the fields specified below, although the exact requirements may vary depending on the type of event in question.

- **EventID** - A unique identifier of the event, assigned by the user. Used for sequencing
- **EventDate** - Date on which the event occurred
- **Country** - Country in which the event occurred
- **ToCountry** - Country in which a Transport or Shipping event ended (if a Transport or Shipping event moves product from one country to another)
- **CreationType** - Indicates whether product was sourced from aggregators or whether a pre-29 June 2023 parcel is being created
- **CropYear** - Specified in YYYY/YY format e.g. '2025/26'
- **FarmerPurchase [List]** - List of farmers (each identified by a **CTOFarmerID**) that provided product to the specified aggregator. If a FarmerPurchase List is not included, all farmers associated with the aggregator are listed as contributing to the parcel
- **AggregatorID** - A unique identifier for the aggregator that the product has been sourced from
- **AggregatorDocumentID** - Identifying reference of a contract, waybill, or other relevant document connecting the aggregator with the purchase or transport from that aggregator
- **FacilityID** - A unique identifier for a warehouse or processing facility such as a factory where product is stored or processed
- **OperationType and Description** - The type of operation being carried out e.g. cleaning. ICE CoT will specify a list of valid values with a free-text option

- **OperationReference** - A reference to the operation carried out that is provided by the user
- **ContinuousProcess** - Where continuous processing occurs, alternative tests apply as weight-testing of inputs and outputs cannot be applied on an event-by-event basis
- **DocumentRef** - Document reference number. Includes a reference to a transport or processing document and is provided by the user
- **InputParcels [List]** - List of one or more input parcels that the event is consuming
- **OutputParcels [List]** - List of one or more output parcels that the event is producing. Only required if the Output Parcel is different to the Input Parcel
- **ParcelID** - A unique identifier for a parcel produced by an event. Where an event does not change a parcel, the ParcelID does not change
- **NetWeight** - Net weight in kilograms, excluding packaging
- **Owner Name, Owner Address, Owner Email, [Owner Website]** - identifies the owning entity at the relevant event
- **HSCode** - Corresponds to the codes listed in Annex I of the EUDR
- **ProductType** - Specific type of product within the HSCode, e.g. 'roasted arabica beans'. ICE CoT will specify a list of valid values
- **Product Description** - Optional free text for the user to describe the parcel, e.g. a particular grade/size of beans or any other description in addition to ProductType
- **B/L Fields and [Associated Document]** - Scan of bill of lading and specified information fields
- **B/L Fields** - Information in respect of a bill of lading (**Document ID, Document Date, Gross Weight, Vessel Name, Origin Port, Destination Port, Sender Details, Receive Details**).

Underlying systems, information and documentation to evidence the uploaded data and responses in the disclosure statements are required to be available for inspection and verification.

Physical flow traceability data is not shared with a buyer or with other users except that: details regarding the immediate seller are always shared with a buyer; bill of lading information is shared with a buyer until due diligence statement creation, after which it is not required to be shared; other physical flow traceability data may be shared with a buyer at the seller's option.

ICE CoT currently supports file upload in a JSON format text file with a defined set of objects and fields.

1.7 PHYSICAL FLOW TRACEABILITY DATA METHODOLOGY TESTS

ICE CoT will apply consistency and reasonability tests to the Physical Flow Traceability Data under the Physical Flow Traceability Data Validation Methodology. All required data fields must be supplied.

ICE CoT Physical Flow Traceability Data Validation Methodology test methods and thresholds are subject to continuous review and may be updated, removed or added to. Current tests as of the date of this document include:

- Complete linkage across events and countries (i.e. a full traceability tree) must be provided from any parcel back to the aggregators from which the commodities contained in or used to make such parcel were sourced and to a set of farm plots where the commodities were produced
- The linkage of events and parcels must form a consistent sequence in time
- Input and output product types and weights must be consistent for the specified operation

- Input and output product weights must be consistent through the supply chain
- Each identified aggregator must match an eligible aggregator (with eligible farmers) from a completed Aggregator Systems Disclosure Statement and Lawful Production and Compliance Risk Disclosure Statement
- Each identified facility must match an eligible facility from a completed Physical Flow Traceability Disclosure Statement
- Each country of production must match an eligible country from a completed Lawful Production and Compliance Risk Disclosure Statement
- Transport or Shipping event countries must match eligible countries from a completed Transport and Shipping Disclosure Statement
- There must be a reasonable distance from the aggregator to the associated farm plots
- Volume of physical commodity supplied by each aggregator per crop year must be reasonable based on the number and size of associated farm plots
- Data relating to bills of lading must be consistent with the document scan

1.8 PHYSICAL FLOW TRACEABILITY DISCLOSURE STATEMENT

EUDR-compliant supply chains are expected to have in place systems and processes for warehousing or operational facilities to demonstrate compliance with applicable traceability requirements.

The ICE CoT Physical Flow Traceability Disclosure Statement is a standardised disclosure statement which collects information regarding these systems and processes, including:

- identification of facilities (including **FacilityID, Facility Name and Address, Facility Geopoint, Country and Commodity**) collected via a **Facilities File**
- traceability system information (including **Traceability System Category, Date of Most Recent Audit, Availability of Underlying Traceability System Information**) collected via a Facilities File
- whether systems and processes are in place such that each parcel is identified, recorded and tracked through each and every step in each warehousing and operational facility and no untraced commodities or products are contained in or used to make such parcel
- whether systems and processes are in place to associate each quantity of physical commodities or product and its identifier with the corresponding ICE CoT ParcelID

Underlying systems, information and documentation to evidence the responses in disclosure statements must be available for inspection and verification.

Only warehousing and operational facilities with fully and satisfactorily completed disclosure statements are eligible to be included in the Physical Flow Traceability Data for any commodities or products submitted on ICE CoT.

1.9 TRANSPORT AND SHIPPING DISCLOSURE STATEMENT

EUDR-compliant supply chains are expected to have in place systems and processes for transport and shipping events to demonstrate compliance with applicable traceability requirements.

The ICE CoT Transport and Shipping Disclosure Statement is a standardised disclosure statement which collects information regarding these systems and processes, including:

- whether systems and processes are in place such that each parcel is identified, recorded and tracked through each transport and shipping event and no untraced commodities or products are contained in or used to make such parcel
- whether systems and processes are in place to associate each quantity of physical commodities or product and its identifier with the corresponding ICE CoT ParcelID

Underlying systems, information and documentation to evidence the responses in the disclosure statements must be available for inspection and verification.

Only transport and shipping events in a country with a fully and satisfactorily completed disclosure statement are eligible to be included in the Physical Flow Traceability Data for any commodities or products submitted on ICE CoT.

To complete a Transport And Shipping Disclosure Statement for a country, a user must have uploaded data for at least one eligible facility within that country (pursuant to a Physical Flow Traceability Disclosure Statement).

1.10 RISK ASSESSMENT PROCESS

ICE CoT's Risk Assessment Dashboard includes information relating to specified EUDR risk criteria and identifies how ICE CoT can support the demonstration of a user's EUDR risk assessment regarding commodities and products. The information includes:

- how ICE CoT input data and disclosure statement requirements, validation methodologies and review protocols, and ICE CoT membership and grievance procedures, support users in demonstrating compliance with EUDR risk assessment requirements
- European Commission production country risk classifications
- Data regarding the presence of forest and prevalence of deforestation in the country
- Data regarding concerns in relation to the country, including corruption, regulatory quality, rule of law, human rights, conflicts and sanctions
- Data regarding risks associated with infringing the rights of indigenous peoples

1.11 THIRD-PARTY DESK AND FIELD-BASED INSPECTION PROGRAMME

ICE CoT will use a risk-based (and with random selection), third-party desk and field-based independent Data Inspection and Verification Programme to support the data collection and the review protocol and validation methodology processes described above.

All systems, processes, evidence and information confirmed to be present in respect of the uploaded data (including in disclosure statement responses) are required to be available for inspection and verification on request to check its completeness, truthfulness and accuracy.

Data checks and control points will be identified regarding the ICE CoT input data (including responses in disclosure statements) across farm plots, lawful production and compliance risk systems and processes, and physical flow traceability for commodities and products submitted on ICE CoT.

Risk-based samples of parcels, aggregators and farmers, facilities, and transport and shipping events across multiple countries will be subject to field and desk-based inspection and verification processes in accordance with ICE CoT's Data Inspection and Verification Programme, including to check reported aggregator and facility systems processes related to lawful production and traceability, underlying documentation (where applicable) and farm plots.

The Data Inspection and Verification Programme is being designed and implemented with the support of FLOCERT as independent field auditor for the ICE CoT platform.

1.12 MEMBERSHIP PROCESS

ICE CoT offers three categories of user membership:

- Primary data uploaders: for use of ICE CoT to upload farm plot and aggregator data for the country of production related to commodities and products and supply chain data.
- Secondary data uploader: for use of ICE CoT to upload traceability and supply chain data (but not for uploading farm plots or aggregators).
- ICE clearing members: for use of ICE CoT to effect delivery of commodities pursuant to exchange-traded and cleared contracts (but not uploading farm plots or aggregators or traceability and supply chain data)

The membership application process and requirements differ depending on the membership category. All categories of member will be required to complete an application form and identify any affiliates intending to use ICE CoT. Primary data uploaders must also provide corporate ownership and business integrity information. All applicants will be subject to KYC screening and must sign a user agreement. In that agreement, all users will confirm to IBA that the data they upload is true, accurate and complete.

All decisions regarding membership are made by the ICE CoT Membership Committee and will be subject to ongoing review. Continued membership is subject to compliance with the ICE CoT user agreement and usage rules. Decisions regarding membership may be appealed to IBA's Audit and Risk Committee

1.13 SURVEILLANCE PROCEDURES

ICE CoT has Surveillance Procedures designed to monitor input data and platform user behaviour and to help identify and investigate anomalies and suspicious activity. Automated tests and analyst oversight are used to identify behaviours of interest and highlight areas of risk. Surveillance can also identify data quality issues or errors and inconsistencies, and help to measure usage and performance. Periodic surveillance reports will be made to the ICE CoT Advisory Oversight Committee.

Anomalies and suspicious activity identified by the Surveillance Procedures may be investigated and escalated, including to the ICE CoT Advisory and Oversight Committee, using the Data Inspection and Verification Programme, and through the Grievance Procedure.

1.14 CHALLENGE PROCESS

ICE CoT has a Challenge Process through which users can submit a challenge in circumstances where one or more farm plots have failed certain ICE CoT Farm Plot Data Validation Methodology tests. A user may submit a challenge and request a review of the outcome of such tests if they believe the underlying Farm Plot Data to be compliant.

To be eligible for review, a challenge must, among other things: (i) include the required supporting evidence; and (ii) relate to a test that falls within the scope of the ICE CoT Challenge Process. Once successfully submitted for review, challenges may be accepted, rejected, or returned to the user with a request for further information.

1.15 GRIEVANCE PROCEDURE

ICE CoT has a published Grievance Procedure through which users or third parties can submit, or the ICE CoT platform itself can identify, new information regarding potential non-compliance of commodities

or products registered on ICE CoT with EUDR or ICE CoT requirements. The current procedure is available [here](#).

Grievances are submitted or identified through the submission of an online grievance form and processed by IBA for review by the ICE CoT Grievance Committee. Further information may be requested to determine the appropriate course of action, which may include ICE CoT or an ICE CoT user informing a national competent authority or supply chain actors of the grievance, or suspending any commodities and products on ICE CoT permanently or temporarily.

The EUDR contains provisions for raising, with relevant national competent authorities, substantiated concerns regarding non-compliance. It also contains provisions for Member States and national competent authorities to take measures and actions in response to potential and actual non-compliance with the EUDR. Users of ICE CoT are required to provide ICE CoT with information regarding any EUDR notifications related to potential non-compliance and any action taken by Member States or national competent authorities. Such information may result in a new grievance or be passed to the committee for consideration in respect of an existing grievance. The committee may defer any decision regarding a grievance until any substantiated concern or other EUDR assessment process has concluded and any measures or action under the EUDR have been taken.

1.16 COMPLAINTS POLICY

ICE CoT has a published Complaints Policy through which complaints may be made regarding potential issues or concerns that may arise with ICE CoT system's operation, including technical or operational issues, platform user issues, system access issues, or reference data and methodologies. Complaints may also be made regarding the outcome of any ICE CoT Grievance Procedure or Challenge Process. The current procedure is available [here](#).

Eligible complaints are investigated by IBA, which will determine whether to uphold the complaint and any remedial action.

1.17 INFORMATION AND DISCLAIMERS

The ICE CoT platform is provided by ICE Benchmark Administration Limited ("IBA") to support users with their due diligence obligations under the EU Deforestation Regulation (Regulation (EU) 2023/1115, as amended by the Regulation 2024/3234, "EUDR"). The ICE CoT platform collects and reviews or tests input data and uses the specifications, disclosure statements, methodologies and protocols described in this public methodology document to do so.

Users of ICE CoT, including any operators or traders with obligations under the EUDR, remain solely responsible for: (i) the commodities and products that they supply or acquire and any data or information associated with such commodities and products, including any data or information submitted to ICE CoT by any users; (ii) the status of such commodities and products as being deforestation-free and lawfully produced; and (iii) their own compliance and the compliance of such commodities and products with applicable EUDR requirements, including in each case regarding their own due diligence and the production, transfer, storage, processing, supply, import, and export of commodities and products, and for all transactions, record-keeping and reporting. IBA has no responsibility whatsoever for such commodities and products and data, or for any such status or compliance.

The ICE CoT platform outputs are based upon: (i) inputs of data provided by ICE CoT users pursuant to upload specifications, disclosure statements and other data requirements, who are and remain responsible to IBA for the accuracy and completeness of the data they submit to ICE CoT; and (ii) other third-party reference data. ICE CoT applies reviews and tests to the input data submitted by ICE CoT users in accordance with its protocols and methodologies. While the input data collected and these reviews and methodologies have been designed to support users in identifying data that may be inaccurate, incomplete, or which indicates commodities and products have been produced within deforested areas or in breach of applicable local laws, the ICE CoT platform outputs are not and should not be regarded as a conclusive and definitive confirmation that the input data was accurate and complete or that the relevant commodities and products are, or are not, deforestation-free and lawfully produced. There can be no guarantee that the reviews and tests will not validate inaccurate or incomplete data, or commodities and products produced on land within deforested areas or that have not been produced lawfully, or that the reviews and tests will not reject accurate and complete data, or commodities and products from land outside deforested areas and that have been produced lawfully. None of IBA, its affiliates, any third party providers of reference data to ICE CoT, or any service providers to ICE CoT, are liable for any input data that may be submitted to ICE CoT by any user, including any which may be inaccurate, incomplete, false or submitted fraudulently.

Registration of a parcel of commodities or products on ICE CoT does not confer legal or beneficial title or ownership to any commodities or products. A transfer of a parcel on ICE CoT from one holder to another does not transfer legal or beneficial title or ownership. Users of ICE CoT should ensure that they have taken professional advice and have appropriate contractual arrangements and legal protections in place with any counterparty regarding any commodities or products, including appropriate representations, warranties and covenants regarding compliance with applicable regulations, including, EUDR, and regarding the truthfulness, accuracy and completeness of any due diligence data, including any data uploaded on ICE CoT, in relation to such commodities or products.

Parcels of commodities or products registered on ICE CoT may be suspended or removed from the platform, including where new information indicates that the commodities or products are at risk of not complying with applicable ICE CoT or EUDR requirements. Users of ICE CoT may have their access suspended or terminated in certain circumstances, including for breaching the ICE CoT user agreement or usage rules.

None of ICE CoT, the data collected or the methodologies and protocols used by it can definitively establish or confirm that any commodity or product: (i) has been produced on land that is deforestation-

free and has been lawfully produced; or (ii) is compliant with the EUDR, or that all due diligence required by the EUDR has been exercised.

ICE CoT is designed to support users in their own submission of due diligence statements to the EU information system through the ICE CoT platform. Each of ICE CoT, IBA, its affiliates, each third party provider of reference data to ICE CoT, and each service provider to ICE CoT, is not an authorised representative under the EUDR, does not submit due diligence statements on behalf of ICE CoT users, and is not responsible for submitting due diligence statements or for the compliance of relevant commodities or products referenced in a due diligence statement with the EUDR. ICE CoT users remain responsible for the submission of any due diligence statement in respect of any commodities and products required under EUDR. Where ICE CoT users use ICE CoT to submit a due diligence statement, they retain responsibility for the compliance of the relevant commodities or products referenced in the due diligence statement with the EUDR.

None of IBA, its affiliates, any third party providers of reference data to ICE CoT, or any service providers to ICE CoT, provides recommendations regarding commodities or products, or legal, financial, tax, or investment advice on any matter. None of the information available from ICE CoT should be taken as constituting a recommendation or legal, financial, tax, or investment advice.

ICE Benchmark Administration Limited is authorised and regulated by the UK's Financial Conduct Authority for the regulated activity of administering a benchmark. ICE CoT is an unregulated product and in particular is neither an index nor a benchmark for the purposes of the EU Benchmarks Regulation (Regulation 2016/1011) or that regulation as enacted in the UK under the European Union (Withdrawal) Act 2018 (UK Benchmarks Regulation) nor is it an ESG rating for purposes of the ESG Ratings Regulation (Regulation 2024/3005) or any similar law. Accordingly, none of the regulatory protections of the EU Benchmarks Regulation, UK Benchmarks Regulation and ESG Ratings Regulation apply to ICE CoT, the inputs submitted to it, the outputs it provides or the methodologies and protocols it uses.

The information available from ICE CoT, IBA's website, and this document is provided for information purposes only. IBA is not responsible for and makes no representation regarding the appropriateness or suitability of trading in any commodities or products. The ICE CoT platform and all related data and information is provided 'as is' and each of IBA, each third party provider of reference data to ICE CoT, and each service provider to ICE CoT, gives no warranty and makes no representation as to fitness for purpose, satisfactory quality or timeliness of that data or information. In particular, each of IBA, each affiliate of IBA, each third party provider of reference data to ICE CoT, and each service provider to ICE CoT gives no warranty and makes no representation as to the compliance of any commodities, products or related data or information with the EUDR. Any decision to trade (or not to trade) in specific commodities or products should not be made in reliance on the information available from ICE CoT.

Submitted data may be used in ICE CoT's methodologies and protocols and this input data and the outputs of the methodologies and protocols may be shared, including with other users, in accordance with ICE CoT's policies and procedures. All information and data submitted to ICE CoT, and all underlying data, documentation, evidence, systems and processes, is required to be made available for inspection and verification upon request in accordance with ICE CoT's inspection and verification programme and if requested by any national competent authority.

Access to ICE CoT is only available to entities which have executed a user agreement. To the fullest extent possible, none of IBA, Intercontinental Exchange, Inc. (ICE), ICE's affiliates, any third party providers of reference data to ICE CoT, any service providers to ICE CoT, or any of or its or their directors, employees, agents, advisors or consultants, will be liable in contract or tort (including, without limitation, negligence, breach of statutory duty or nuisance) or under statute (including under antitrust laws, environmental laws or the EUDR) in any jurisdiction or under the laws of any country, for misrepresentation or otherwise, regarding any inaccuracies, errors, omissions, delays, failures, cessations, or changes (material or otherwise) in ICE CoT or the information available from ICE CoT (including any input data, reference data or output data), or for any damage, expense or other loss (whether direct or indirect or consequential) that may be suffered relating to or in connection with the

information available from ICE CoT or any reliance placed on it. All implied terms, conditions and warranties, including without limitation as to quality, merchantability, fitness for purpose, title or non-infringement, in relation to ICE CoT and the information available from it are excluded to the fullest extent possible.

Intellectual Property

IBA reserves all rights in ICE CoT, in the information available from ICE CoT and IBA's website, in the contents of this document, and in the methodologies described in this document. Each third party provider of reference data on ICE CoT, including Meridia, Space Intelligence, KPMG, FLOCERT, and the members of the IBAT Alliance (BirdLife International, Conservation International, International Union for Conservation of Nature and Natural Resources (IUCN) and The UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC)), reserves all rights in any data provided by it on ICE CoT.

This document, together with all contents therein including the methodologies described in this document, the information available from ICE CoT and IBA's website, together with all rights in and to each of the foregoing, including but not limited to all intellectual property rights, including patent, copyright, database, trademark and trade secret rights, along with all know how, and confidential information, are proprietary to and the exclusive property of IBA.

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ICE CoT EUDR deforestation maps are used under licence from Space Intelligence, a leading provider of audit-grade nature mapping data.

ICE CoT Farm Plot Data Validation Methodology developed with Meridia, an agtech company specialised in field data solutions in complex and smallholder-heavy agri-commodity supply chains such as cocoa and coffee.

Lawful Production and Compliance Risk Disclosure Statements and Review Protocol each developed with the support of KPMG Netherlands and legal and sustainability experts across the KPMG global network.

IBA has appointed FLOCERT GmbH to be the independent field auditor for the ICE CoT platform. FLOCERT will conduct audits and inspections regarding information, systems and evidence which support the data uploaded to ICE CoT in accordance with ICE CoT's Data Inspection and Verification Programme, which is being designed and implemented with the support of FLOCERT. FLOCERT is a leading global assurance provider offering certification, verification, and customised sustainability to support companies sourcing on fair principles.

The services provided by FLOCERT are limited to providing audit services in accordance with ICE CoT's Data Inspection and Verification Programme.

FLOCERT will only be able to provide audit services upon provision of and access to the auditable data from ICE CoT users in accordance with ICE CoT's Data Inspection and Verification Programme. All

uploaded data, and all systems, processes and data confirmed to be present by ICE CoT users including in disclosure statement responses is required to be available for inspection and verification on request under ICE CoT's Data Inspection and Verification Programme.