Recent Updates to the FTSE UK Index Series Ground Rules and Eligibility Criteria

March 5, 2025

On March 3, 2025, FTSE Russell announced two significant updates to the FTSE UK Index Series Ground Rules and eligibility criteria, which will take effect from September 22, 2025.¹

I. Requirement for a Sterling Denominated Price

Trading Prices in Sterling, US Dollars and Euros Permitted: Currently, only equity securities trading in Sterling ("GBP") on the London Stock Exchange's ("LSE") SETS platform are eligible for inclusion in the FTSE UK Index Series. ² From September 22, 2025, securities trading in Euros or US Dollars will be eligible for inclusion, provided they meet all other index eligibility criteria, including the United Kingdom ("UK") nationality requirement.³ If you have any questions concerning this memorandum, please reach out to your regular firm contact or the following authors.

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It is hoped that this modification will more accurately represent UK companies listed on the LSE, and better align the FTSE UK Index Series with other FTSE Russell domestic indices that already allow non-local currencies.

It should be noted that the base currency of the FTSE UK Index Series will remain GBP. Non-GBP securities included in the index will have their market prices converted into GBP for index calculation purposes.⁴

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³ UK incorporated companies which are listed and trading on the London Stock Exchange on the equity shares (commercial companies) or closed-ended investment fund categories, with a free float of 10% or above, and pass the FTSE UK Index Series liquidity test, will be assigned a UK nationality for the purposes of FTSE UK Index Series eligibility. Non-UK incorporated companies must satisfy additional criteria, including: (i) a free float of 25%; (ii) publicly acknowledged adherence to the principles of the UK Corporate Governance Code, pre-emption rights, and the UK Takeover Code as far as practical; and (iii) being incorporated in a "developed" or "low taxation" jurisdiction (in each case, as defined by FTSE rules). Additional considerations apply where the company is listed in multiple jurisdictions. ⁴ For daily calculations, end-of-day exchange rates will be used. For intra-day calculations, real-time exchange rates will be applied.



¹ <u>FTSE Russell announces changes to FTSE UK Index Series methodology.</u>

² Rule 4.1.1. of the <u>FTSE UK Index Series Ground Rules</u>.

This memorandum was prepared as a service to clients and other friends of Cleary Gottlieb to report on recent developments that may be of interest to them. The information in it is therefore general, and should not be considered or relied on as legal advice. Throughout this memorandum, "Cleary Gottlieb" and the "firm" refer to Cleary Gottlieb Steen & Hamilton LLP and its affiliated entities in certain jurisdictions, and the term "offices" includes offices of those affiliated entities.

II. Fast Entry Thresholds

Lowering of the Fast Entry Thresholds:

Currently, to be considered for Fast Entry inclusion: (i) companies must, at market close on the first day of trading, rank 75th or above by full market capitalization in the FTSE UK Monitored List; and (ii) the security investable market capitalization must amount to at least GBP 2 billion. ⁵ From September 22, 2025, companies (i) ranking 225th or above, based on the close price on the first day of unconditional dealings; and (ii) with a minimum investable market capitalization of GBP 1 billion will now be eligible. Eligible companies will be added to either the FTSE 100 or FTSE 250 index, depending on their ranking.

This change aims to allow more companies (and, particularly, companies conducting significant initial public offerings ("IPOs")) to be included in a timely manner, and to ensure the indices reflect the underlying market more accurately. FTSE Russell intends to continue to monitor the Fast Entry thresholds annually to ensure they remain appropriate.

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⁵ Rule 8.4.2. of the <u>FTSE UK Index Series Ground Rules</u>.