



# ICE DATA PRICING & REFERENCE DATA, LLC

100 CHURCH STREET, 11<sup>th</sup> Floor, NEW YORK, NY 10007  
PHONE: (212) 497-3000 FAX: (212) 497-3100  
[WWW.THEICE.COM/MARKET-DATA](http://WWW.THEICE.COM/MARKET-DATA)

Dated: March 30, 2022

This brochure provides information about the qualifications and business practices of ICE Data Pricing & Reference Data, LLC (the “Company”). If you have any questions about the contents of this brochure, please contact us at the telephone number provided above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about ICE Data Pricing & Reference Data, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

ICE Data Pricing & Reference Data, LLC is a registered investment adviser with the SEC. This registration does not imply a certain level of skill or training.

## Item 2 – Material Changes

This section includes a summary of material changes to our business since the Other Than Annual update to our brochure dated January 14th, 2022. There have been no material changes to our brochure.

The Company may update this brochure from time to time. You may obtain a copy of our current brochure by sending a written request to:

ICE Data Pricing & Reference Data, LLC  
Attn: Compliance Department  
100 Church Street, 11<sup>th</sup> Floor  
New York, NY 10007

### Item 3 -Table of Contents

Item 1 – Cover Page .....	1
Item 2 – Material Changes.....	2
Item 3 -Table of Contents .....	3
Item 4 – Advisory Business .....	4
Item 5 – Fees and Compensation .....	6
Item 6 – Performance-Based Fees and Side-By-Side Management .....	7
Item 7 – Types of Customers .....	7
Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss.....	7
Item 9 – Disciplinary Information .....	11
Item 10 – Other Financial Industry Activities and Affiliations .....	12
Item 11 – Code of Ethics .....	12
Item 12 – Brokerage Practices .....	13
Item 13 – Review of Accounts.....	13
Item 14 – Customer Referrals and Other Compensation .....	14
Item 15 – Custody .....	14
Item 16 – Investment Discretion .....	14
Item 17 – Voting Customer Securities .....	14
Item 18 – Financial Information.....	14

## Item 4 – Advisory Business

**The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice.**

ICE Data Pricing & Reference Data, which has been in business since 1968, is a Delaware Limited Liability Company, and is a wholly owned subsidiary of Intercontinental Exchange, Inc. (NYSE:ICE).

ICE Data Pricing & Reference Data provides global securities evaluations, reference data, and analytics designed to support financial institutions' and investment funds' valuation activities, securities operations, research, and portfolio management.

ICE Data Pricing & Reference Data offers the following securities evaluations and analytics services under its advisory business:

### **Evaluated prices<sup>1</sup>**

Evaluated prices are market-based measurements that are processed through a rules-based pricing application and represent our good faith determination as to what the holder may receive in an orderly transaction for an institutional round lot position under current market conditions. The rules-based logic utilizes standard valuation techniques that vary by asset class and maximizes the use of relevant observable inputs, including quoted prices for similar assets, benchmark yield curves and market corroborated inputs. The Company provides both end of day evaluations and continuous evaluated pricing (CEP™).

Evaluations are provided as of a certain time, bid, mean, and ask and based on settlement conventions, dependent on asset class, sector, delivery system, and/ or security type. We produce the same evaluation for each security based on the evaluation type and a given point in time. We also provide CEP throughout the day to subscribers. It is up to the client to choose and retrieve the evaluation type at a point in time.

The Company's affiliates, ICE Data Services Europe Ltd., ICE Data Services Australia Pty Ltd., ICE Data Services Hong Kong Limited, ICE Data Services Singapore Pte. Ltd., ICE Data Services France SAS, and Intercontinental Exchange Germany GmbH provide evaluations for certain securities, which the Company makes available to its customers.

Fixed income and equity securities for which the Company provides evaluated pricing include:

- U.S. and Non-U.S. Corporate and Government Bonds, including investment grade and high yield bonds and preferred stock, fixed and floating rate securities, stripped coupon and principal issues

---

<sup>1</sup> Evaluated Prices may be referred to as evaluated pricing and/ or evaluations throughout the document, all of which represent the Company's activities as defined under Evaluated Prices.

- U.S. and Non-U.S. Leveraged Loans
- U.S. and Non-U.S. Money Market Instruments
- U.S. Municipal Bonds – including taxable & tax-exempt, and investment grade and high-yield municipal securities
- U.S. and Non-U.S. Convertible Securities
- U.S. and Non-U.S. Commercial Mortgage-Backed Securities
- U.S. Collateralized Mortgage Obligations – Agency/Government Sponsored Enterprise (GSE)
- U.S. and Non-U.S. Private Label Residential Mortgage-Backed Securities (RMBS)
- U.S. and Non-U.S. Asset-Backed Securities (ABS)
- U.S. Agency/GSE Pass-Through Securities – including FNMA, FHLMC, GNMA and SBA securities, and
- Sovereign and Emerging Market Debt
- Global and American Depositary Receipts (ADRs)
- International equities, international equity index futures and international equity options

### **Fair Value Information Service**

The Company offers Fair Value Information Services which are designed to provide subscribers with information that can be used to estimate a price for a non-U.S. fixed income security, equity security, equity index futures contract, or equity option that would likely prevail in a liquid market, in view of market information available at the time.

### **Evaluated curves**

Evaluated curves are created by using inputs of constituent bond evaluations. Curves are available based on local market end-of-day bond evaluations as well as market close of other regions using CEP. CEP on constituent bonds permits curves to also be made available continuously throughout the day.

### **Model Based Sector curves**

Model Based Sector curves are created by using bond evaluations as inputs into regression models to produce granular sector curves defined by various bond attributes including, but not limited to, geographical region or country of issuance, tier, rating and industry sector.

## **Market Sentiment**

The Company offers the Market Sentiment service, which is intended to help identify periods of time where markets may become less well-defined and there may be the potential for a greater likelihood of market dislocation and a growing mix of differences of opinion as to what assets may be worth, based on the data available to ICE Data Pricing & Reference Data. The Market Sentiment service covers:

- U.S. dollar denominated corporate bonds
- U.S. municipal bonds

The service is provided on an issuer, industry, and asset class, basis. Market Sentiment scores are not published as an individual instrument-level score.

## **Item 5 – Fees and Compensation**

**The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice and, as such, its fees and compensation arrangements are not typical of those historically employed by investment advisers.**

The Company provides its services to a wide range of institutional customers (see Item 7 for additional information) and typically offers three types of fee arrangements:

- Fixed fee subscription (on either a multi-year, annual, quarterly, monthly, or daily basis)
- Variable fees based on the amount and/or type of information received (“usage-based fees”)
- Combination of fixed fee subscription and usage-based fees

Fees are subject to negotiation. Fees vary based on the services selected, method of delivery, and delivery frequency. For a small number of customers, the Company provides services in exchange for contributed market data. The Company may also receive fees from third party resellers which can also be based on the size or number of end-users or other factors.

The Company does not require or solicit prepayment of fees six months or more in advance for products and services offered in connection to its registration as an investment adviser and described in Item 4 above.

## **Additional Fees and Expenses**

Third party licenses and additional fees may apply for access to certain data. Customers are responsible for any applicable taxes and for their own costs associated with all equipment and communication necessary to access the service.

## Item 6 – Performance-Based Fees and Side-By-Side Management

**Not Applicable - The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice, and therefore there are no performance-based fees or side-by-side management.**

## Item 7 – Types of Customers

The Company calculates, publishes, and provides its evaluated pricing to a wide range of primarily institutional customers, including:

- Government entities
- Broker-dealers
- Banks and thrifts
- Clearing and custody firms
- Investment advisers and registered investment companies
- Other pooled investment vehicles (e.g., hedge funds and private funds)
- Fund administrators and processors
- Pension and profit-sharing plans
- Insurance companies
- Data vendors
- Corporations and other business entities
- Public accounting and research firms
- Universities and other not-for-profit entities

## Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss

**Not Applicable - The Company does not design, market or sell investment strategies, manage assets, or provide personalized investment advice.**

Below is a summary description of the methodologies utilized by the Company in connection with its advisory services:

### **FIXED INCOME EVALUATED PRICING**

The Company provides and publishes evaluated pricing for approximately 2.8 million fixed income securities daily.

The Company estimates and publishes evaluated pricing based upon its documented methodology, incorporating specific data inputs and widely recognized financial formulas. These evaluated prices are intended to represent an objective third party view of what a holder of the security may receive in an orderly transaction under current market conditions. The rules-based logic utilizes standard valuation techniques that vary by asset class and maximizes the use of relevant observable data including quoted prices for similar assets, benchmark yield curves and

market corroborated inputs. The Company prepares and publishes both intraday and end of day evaluations.

For each asset class, a team of evaluators performs the following activities:

1. Design and document a methodology for calculating the value of securities based upon the relevant set of data inputs and widely recognized financial principles
2. Confirm that the process, as implemented, complies with the documented methodology
3. Oversee daily operation of the system, respond to any exception alerts regarding out-of-tolerance inputs or outputs, and correct or exclude erroneous inputs per the documented methodology and update the outputs
4. As appropriate, in coordination with management, identify methodology improvements and make changes to inputs and/or the evaluation process
5. Assess client evaluation challenges and respond based on the determination of their findings

#### CONTINUOUS EVALUATED PRICING

CEP provides evaluations for certain fixed income instruments throughout the trading day. Through rules-based logic, these evaluations are continuously updated as market information, including dealer quotes and trades, are received and processed. Trade execution data from FINRA and the MSRB's trade reporting systems are important inputs into our evaluations of US Corporate, US Agency, US TBA MBS and US Municipal bonds. For convertible bonds and exchangeable securities, listed exchange trades for convertible preferred securities are also taken into consideration as part of the process.

The CEP workflow processes incoming data with evaluator oversight. Incoming market data is enriched to convert between spread, yield and/or price information as appropriate and assessed against the current evaluation, internal system tolerance levels and parameters. The pricing applications generate exceptions based on internal tolerance thresholds and notify evaluators to review. Based on the exception review process, preset parameters may be adjusted to reflect prevailing market conditions. Continuous evaluated prices will not be updated until those reviews are complete. Note that the time of the last update to a CEP evaluated price is automatically made available to clients in a number of delivery mechanisms yet some delivery mechanisms require the customers to select if they want to receive this information in their delivery.

CEP produces evaluations continuously and contributes to our "end-of-day" fixed income evaluated price (e.g. as of 3:00 Eastern Time and/or 4:00 Eastern Time for U.S. markets) process. For non-US securities, continuous evaluations are calculated throughout the trading day with end-of-day evaluations as of the close of the applicable local market.



## END-OF-DAY FIXED INCOME EVALUATED PRICING

End-of-day fixed income evaluated prices are produced by incorporating intraday market information processed by algorithms in near real time. These evaluated prices are produced based upon the applicable close of the applicable local market or, in the U.S., U.S. corporate and structured securities are made available as of both 3:00 p.m. and 4:00 p.m. Eastern Time. Evaluated prices for U.S. municipal bonds and U.S. convertible bonds are as of 4:00 p.m. Eastern Time.

Consistent with the process for CEP, as exceptions are identified by the algorithm, the pricing applications generate notifications that are reviewed by the evaluators. More time is allotted for the release of end-of-day evaluations to support additional quality controls, including sign off by the asset class manager prior to the release. Please note that the results of these reviews may not be known by the end of day evaluation snap time, which may result in differences between the continuous evaluated price and the end-of-day evaluated price associated with the applicable snap time.

## EVALUATED CURVES

Determination of eligible securities for use as constituents in a specific curve is conducted within our proprietary evaluated pricing application using search criteria based on security characteristics relevant to the specific issuer or sector curve. Issuer curves specify issuer, tier and currency while sector curves utilize country/region, industry sector, tier, rating and currency.

End-of-day yield and spread curves are constructed following the completion of the end-of-day bond evaluation processes, including their respective quality control procedures. Certain curves are also available intra-day at market close of other regions using inputs of CEP.

The curves are monitored by evaluators who review and resolve exceptions flagged by the system. Systematic checks incorporate preset tolerances and parameters and generate alerts for any exceptions.

## MODEL BASED SECTOR CURVES

Curves leverage cross-section modeling, in contrast to time series modeling, to analyze data at a specific point in time and use regression models to analyze the relationship between various inputs. We use multiple regression models incorporating several factors, including but not limited to geographical region or country of issuance, tier, rating and industry sector. Regression models are run for each targeted tenor point.

The inputs include most fixed-rate bonds in the Company evaluated pricing universe denominated in over 30 model-eligible currencies. The evaluated mid-price for each bond is converted to the z-spread and is included in regression models of multiple currencies.

We provide continuous compounding z-spread sector curves calculated off the appropriate LIBOR or OIS swap curve and derive zero yield curves and par yield curves based on the z-spread curve produced (and corresponding swap curve) for multiple tenor points in over 30 currencies. Curves for each currency are fit independently of the others. An outlier removal procedure is in place and used in the production of the curves.

## MARKET SENTIMENT

The Company produces Market Sentiment scores by observing and scoring trade data and dealer quotes, each as received by the Company (collectively, Market Points), using the ICE Best Execution Service (BestEx service)<sup>2</sup>. Depending on the Market Point type (side and size) and the corresponding BestEx score, the model generates a Market Sentiment score. That score is the numerical value indicating a more positive or negative direction of market observations compared to the continuous evaluated price of the security associated with the Market Point. The model runs continuously throughout the day using a time weighted approach designed to help maintain sensitivity on the near-term market activity.

Not all instruments are eligible for Market Sentiment calculations. Market Sentiment scores are a point in time output and as such, are dependent on and only consider the information available to the Company at the time of calculation. Market Sentiment utilizes inputs in its calculations that may not be used in other services provided by the Company pursuant to the methodologies employed by such other services.

## EQUITIES EVALUATED PRICING

### GLOBAL & AMERICAN DEPOSITARY RECEIPTS (ADRS)

The Company provides daily evaluated pricing for listed and unlisted ADRs. ADRs are calculated at approximately 4:30 p.m. Eastern Time. For Latin and South American market-based ADRs, the Company uses the 4:00 p.m. Eastern Time intra-day underlying price when trading is still in session.

---

<sup>2</sup> The ICE Best Execution service (Best Ex) provides users the ability to score or rank the execution of a fixed income trade versus other comparable trades within a selected universe. The Best Ex score represents the percentage of trades that were executed at a less favorable level within the selected universe compared to our CEP<sup>TM</sup> or other relevant reference price, including a price set by the user. The numerical value of the score represents the percentage of all trades executed with larger price mark-ups than the selected trade. The Company does not consider the BestEx service as part of its advisory business.

## FAIR VALUE INFORMATION SERVICES

Our Fair Value Information Services are designed to provide clients with information that can be used by the client to estimate a price for an international exchange-traded equity issue that would likely prevail in a liquid market, in view of market information available at the time of each security's evaluation (e.g., at the time of the New York Stock Exchange close).

## SERVICES LIMITATIONS

The services described in this section are a point in time output and as such, are dependent on and take into account the information available to the Company at the time of calculation. The Company does not have access to all relevant trade-related data or dealer quotes, and the utility of the output may diminish depending upon the amount of available data underlying the analysis. The inputs utilized in each of the services described in this section depend on the methodologies employed by each such service and may not be the same as the inputs used in the other services. There are many methodologies (including computer-based analytical modelling) available to calculate and determine information such as the services described in this section. The Company's services may not generate results that correlate to actual outcomes, and/or actual behavior of the market, such as with regard to the purchase and sale of instruments.

## THIRD-PARTY VALUATION SERVICES

**The Company does not consider the following third-party valuation services it redistributes as part of its evaluated pricing business. For reference, below is a description of each:**

- Valuations for Canadian Dollar-denominated corporate, treasury, provincial, and municipal bonds, zeros, strips, and trusts/funds provided by CanDeal Data & Analytics (Prior to April 12, 2021, this service was provided by SVC<sup>SM</sup>, a service of SS&C Technologies, Inc.)
- Valuations for certain Student Loan Auction Rate Securities (SLARS), and Auction Rate Preferred Securities (ARPS) provided by Pluris Valuation Advisors LLC
- CDO/CLO and other security, derivative and instrument valuations provided by BofA Securities

## Item 9 – Disciplinary Information

On December 9, 2020, ICE Data Pricing & Reference Data, LLC resolved an SEC proceeding with respect to an alleged violation by the Company of Section 206(4) of the Investment Advisers Act of 1940, and Rule 206(4)-7 thereunder, relating to the SEC's allegations that the Company failed to adopt and implement policies and procedures reasonably designed to prevent violations of the Advisers Act and the rules thereunder in connection with the Company's delivery of broker quoted prices for certain categories of fixed income securities for which it did not have sufficient

information to produce an evaluated price. The Company, without admitting or denying the allegations, agreed to the entry by the SEC of an order imposing the following: (1) to cease and desist from committing or causing any violations and any future violations of the Advisers Act section at issue; (2) a censure; and (3) the payment of a civil money penalty in the amount of \$8,000,000. The Company's delivery of broker quoted prices for certain categories of fixed income securities was discontinued on October 1st, 2020.

## **Item 10 – Other Financial Industry Activities and Affiliations**

### **Affiliates**

The Company's affiliates include ICE Bonds Securities Corporation, ICE Securities Execution and Clearing Services LLC, ICE Data Services Europe Ltd., ICE Data Services Australia Pty Ltd., ICE Data Services Hong Kong Limited, ICE Data Services Singapore Pte. Ltd., ICE Data Services France SAS, and Intercontinental Exchange Germany GmbH.

ICE Data Services Europe Ltd., ICE Data Services Australia Pty Ltd., ICE Data Services Hong Kong Limited, ICE Data Services Singapore Pte. Ltd., ICE Data Services France SAS, and Intercontinental Exchange Germany GmbH provide evaluations for certain securities, which the Company makes available to its customers. These affiliates are under common control with the Company.

ICE Data Services Australia Pty Ltd. has been granted an AFS license by the Australian Securities and Investments Commission. ICE Data Services Europe Ltd., ICE Data Services Hong Kong Limited, ICE Data Services Singapore Pte. Ltd., ICE Data Services France SA, and Intercontinental Exchange Germany GmbH are not required to be registered in its jurisdiction.

ICE Bonds Securities Corporation and ICE Securities Execution and Clearing Services LLC are SEC registered broker dealers and wholly owned subsidiaries of ICE, which in turn places them under common control with the Company.

## **Item 11 – Code of Ethics**

**The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice.**

The Company has adopted a Code of Ethics as required pursuant to Rule 204A-1 under the Advisers Act. The Company posts the Code of Ethics on its website, (<http://www.ice.com> under resources-data resources-business practices) and will provide its customers with a copy of its Code of Ethics upon request.

The Code of Ethics covers the following principal areas:

- Standards of ethics expected of Supervised Persons, who must follow principles of integrity, avoidance of conflicts of interest, and honesty in dealings with customers

- Requirements for Access Persons to complete and submit initial and annual securities holdings, confirm quarterly securities transactions reports, and preclear personal transactions in reportable securities
- Requirements for Supervised Persons to promptly report violations of the Code of Ethics and to disclose transactions or relationships that might give rise to a conflict of interest
- Requirements for Supervised Persons to report any outside business activity on a declaration form
- Limitations on the actions of Supervised Persons, including that each Supervised Person may accept or provide only small gifts and accept or provide business entertainment only if infrequent, modest and intended to serve legitimate business goals
- Prohibitions on the actions of Supervised Persons, including that each Supervised Person may not trade based on material, non-public information or tip others to trade based on material non-public information, and may not offer, give or receive bribes in connection with Company business

Each Supervised Person is provided a copy of the Code of Ethics and any amendments thereto and is required to provide a written acknowledgment of the Code of Ethics. Personnel of the Company's affiliates who prepare or supervise the preparation of evaluations are also Supervised Persons and subject to the Code of Ethics.

### **Compliance with the Code of Ethics**

The Chief Compliance Officer is responsible for implementing and administering the Code of Ethics. Supervised Persons are required to report any violations of the Code of Ethics or applicable laws. Failure to comply with the Code of Ethics may result in disciplinary action, up to and including termination.

### **Item 12 – Brokerage Practices**

**Not Applicable - The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice and, therefore, does not select or recommend broker-dealers for client transactions.**

### **Item 13 – Review of Accounts**

**Not Applicable - The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice and does not hold customer accounts.**

## **Item 14 – Customer Referrals and Other Compensation**

ICE Data Services, Inc., the parent of the Company, has entered into a referral agreement, as a result of which the Company may receive client referrals that are subject to compensation.

For a small number of customers, the Company provides services in exchange for contributed market data. The Company also receives fees from resellers/redistributors. The Company does not consider those customer referrals.

## **Item 15 – Custody**

**Not Applicable - The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice.**

## **Item 16 – Investment Discretion**

**Not Applicable - The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice.**

## **Item 17 – Voting Customer Securities**

**Not Applicable - The Company does not design, market or sell investment strategies, hold or manage assets, or provide personalized investment advice.**

## **Item 18 – Financial Information**

As a wholly owned subsidiary of a publicly traded company, Intercontinental Exchange, Inc. comprehensive financial information is readily available to customers by visiting [www.ice.com](http://www.ice.com) and can also be provided by the Company upon request.