

CalPERS Legal Office
Monthly Contract-Related Disclosure Exemption Report
November 20, 2019

CONTRACT-RELATED DISCLOSURE (CRD) EXEMPTION REPORT

Name of Contract Vendor:	ICE Benchmark Administration Ltd.
Type of Contract Vendor:	LIBOR data feed and license agreement
Program Contact:	INVO
CRD Requirement:	Regulation 559.1 requires solicitors and contractors to execute CalPERS' CRD form unless the General Counsel exempts this requirement pursuant to subdivision (g).
Basis for CRD Exemption:	Vendor's services are critical to INVO operations. Vendor is unwilling to sign CalPERS' CRD form (or any other customer disclosure forms). Since the contract amount is relatively small, the absence of a CRD in this instance is a low-risk to the System.