



## Index Termination

The Index Committee may terminate indexes if they no longer meet the index objective, lack critical data, cease to be investable by their stakeholders, or are constrained from implementing their methodology because of market and regulatory changes. They will also be terminated if they cannot be calculated due to zero or negative valuations or other causes. Additionally, indexes may also be terminated because of commercial viability.

VettaFi will make its decision with regards to, and considering the proportionality of, the estimated breadth and depth of contracts and financial instruments that reference an Index and the economic and financial stability impact that might result from the cessation of the Index.

VettaFi will consult with stakeholders or regulators, if possible, where it estimates that the index termination is significant to the stakeholders or regulators. Consultations may be limited to the individual affected parties or a broad published consultation if affecting many parties.

The Index Committee will publish its decision concurrently via its website and to stakeholders via email if the index has licensees or known stakeholders. Where there are known stakeholders, the Index Committee will give minimally 3 months' notice prior to termination, if possible. Where there are no known stakeholders the Index Committee will publish its decision via its website with a minimum notice period of one week, if possible. The Index Committee will also attempt to identify alternative indexes that it produces and endeavor to coordinate with stakeholders and continue calculation, if needed, while the transition is in effect. VettaFi will only recommend Index replacements that it produces. If VettaFi does not have a suitable replacement, it will counsel the need to search for a new provider that can meet the stakeholders needs.

In the event of a sudden termination due to circumstances out of VettaFi's control the Index Committee will post notice of the termination as soon as possible.

Additionally, subscribers and other stakeholders who have contracts or other financial instruments that reference an Index are encouraged to take steps to make sure that they have robust fallback provisions in the event of material changes to, or cessation of, the referenced Index.

Review:

Version	Reviewed	Next Review	Recorded By	Reviewed and Approved By
1.0.0	Jun 2023	Jun 2024	Moshe Greenberg	Index Governance and Index Committee
J.1.1	Jul 2024	Jul 2025	Moshe Greenberg	Index Governance and Index Committee
1.1.2	Jul 2025	Jul 2026	Moshe Greenberg	Index Governance and Index Committee

Changes:

Version	Date	Author/Editor	Summary of Change
1.0.0	June 2023	Moshe Greenberg	Policy Creation
1.1.0	Oct 2023	Moshe Greenberg	Added minimum notification period for indexes with no known stakeholders.
1.1.1	Jul 2024	Moshe Greenberg	Annual Review
1.1.2	Jun 2025	Moshe Greenberg	Added “or other causes” to “They will also be terminated if they cannot be calculated due to zero or negative valuations or other causes.