



WHISTLEBLOWER POLICY

1. POLICY STATEMENT

VettaFi LLC is committed to the highest standards of ethical, legal, and responsible business conduct. We expect that everyone at VettaFi will perform their duties and responsibilities with honesty and integrity, and comply at all times with all applicable laws, rules, regulations, and company policies. If you become aware of actual or suspected illegal conduct or a conduct that violates our policies, it is your responsibility and obligation to report it so that VettaFi may address the violation and work to remedy it.

2. PURPOSE

This Whistleblower Policy has been put in place to:

- Encourage employees, partners or managers to disclose actual or suspected violations of the law or of our policies by VettaFi employees;
- Protect complainants from retaliation;
- Treat all parties to an investigation in a fair and equitable manner;
- Ensure confidentiality to the extent possible;
- Take corrective and disciplinary action if misconduct is discovered.

3. SCOPE

This policy applies to all employees of VettaFi, as well as independent contractors, consultants, agents, representatives, officers, and members of our Board of Directors (the "Board").

4. DUTY TO REPORT MISCONDUCT

It is the duty of all the individuals listed above to report misconduct or suspected misconduct. Such misconduct may include but is not limited to:

- Providing false or misleading information, or withholding material information on VettaFi financial statements, accounting, auditing or other financial reporting fraud or misrepresentation;
- Pursuit of material benefit or advantage in violation of VettaFi's Conflict of Interest Policy;
- Misappropriation or misuse of VettaFi resources such as funds, supplies or other assets;
- Unauthorized alteration or manipulation of computer files;
- Destroying, altering, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal, state, or local law or regulations or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal, state, or local law or regulations;
- Any other violations of federal, state, or local laws;
- Unethical business conduct in violation of any VettaFi policies and/or the VettaFi Code of Conduct;
- Danger to the health, safety, or well-being of employees and/or the general public;

- Forgery or alteration of documents;
- Authorizing or receiving compensation for goods not received or services not performed, or paying for services or goods that are not rendered or delivered;
- Authorizing or receiving compensation for hours not worked;
- Embezzling, self-dealing, or otherwise obtaining an unlawful private benefit (i.e., VettaFi assets being used by anyone in the organization improperly for personal gain).

5. ACTING IN GOOD FAITH

Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds to believe that the information disclosed indicates wrongdoing.

VettaFi prohibits retaliation against anyone who makes a good faith report of misconduct under this policy or participates in good faith in a resulting investigation. Anyone who engages in retaliatory conduct in violation of this policy will be subject to disciplinary action up to and including termination of employment.

However, making allegations that are determined by VettaFi to be unfounded and malicious or knowingly false is prohibited and may result in disciplinary action up to and including termination of employment.

6. PROCEDURE

Complaints and concerns may be submitted in writing to Josh Wymard, General Counsel at josh.wymard@vettafi.com or Stephanie Flank, Chief Human Resources Officer at stephanie.flank@vettafi.com.

You are encouraged to provide as much detail as possible regarding your complaint or concern. Please be candid and include all relevant and corroborating information known to you. In order to better respond to any reported concerns, it would be helpful if you provide your telephone number and other contact information when making the report. However, if you prefer to remain anonymous, you may report a concern without disclosing your name. The complainant should expect to receive confirmation of receipt of the complaint within three (3) working days if contact information is provided.

When there is reasonable cause to believe that a violation of law has occurred and an employee is not satisfied with the results of the internal reporting, or prefers not to report internally, they may also report directly to the appropriate legal governmental agency without fear of retaliation. Dependent on the nature of the complaint, this may include federal and local regulators of financial products.

7. INVESTIGATION

VettaFi treats all reports seriously and will promptly review and address each concern as appropriate. This may involve an investigation conducted by qualified personnel. Investigations will be conducted confidentially to the extent practical and appropriate under the circumstances; however, some disclosure may be necessary to effectively investigate the complaint. Appropriate corrective action will be taken to the extent appropriate.

8. MODIFICATION

VettaFi may modify this policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with applicable legal requirements.

Review:

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Reviewed by	Legal
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Changes:

Version	Date	Author/Editor	Summary of Change
1.0.0	June 2023	Stephanie Flank	Policy Creation
1.0.1	Aug 2023	Moshe Greenberg	Annual Review and added language for external reporting.