



## Index Policies

The Index Committee (IC) establishes policies and procedures for index maintenance and rebalances. It reviews indices and their methodologies annually to ensure that they remain fit for purpose. It manages and approves methodology and operational changes made to ensure that the index meets its objectives. These changes may be necessary due to design issues, market changes, and capacity constraints. The Index Committee also conducts consultations as needed on methodology or operational questions. It is also responsible for decision making regarding the exercise of Expert Judgement and Discretion.

### 1. Discretion

The IC may decide to make decisions on constituent inclusion based on expected market changes to reduce turnover or to further the best interests of the index. For example, to reduce turnover, it may decide to remove a constituent that meets eligibility criteria at rebalancing if the constituent is expected to become ineligible for inclusion before the next rebalancing.

### 2. Holiday Schedule and Market Closures

The index is calculated when its main constituent markets are open. In a multi-country index when one of the countries is closed for trading, the last available price will be used. In certain cases, an index methodology may specify a different schedule.

When a rebalance or reconstitution occurs and some of the previous or new index constituents' markets are closed, the rebalance or reconstitution may be moved if the Index Committee considers that this will cause significant tracking error for the stakeholders of the index. Any change in schedule will be communicated at least a week in advance when possible.

### 3. Data Integrity

VettaFi uses various quality assurance tools to monitor and maintain the accuracy of its data. While every reasonable effort is made to ensure data integrity, there is no guarantee against error. Adjustments to incorrect data will be handled on a case-by-case basis depending on the significance of the error and the feasibility of a correction. Incorrect intraday ticks of the index resulting from data errors will not be corrected.

### 4. Expert Judgement

If a price or data point is not available, or appears incorrect, the committee will use its expert judgement based on available data to determine its value. In the case of prices, if an exchange price is not available, an OTC price or estimated price may be used.

## Contact Information

For any questions regarding an index, please contact: [indexgovernance@vettafi.com](mailto:indexgovernance@vettafi.com)

## Changes

Version	Date	Author/Editor	Summary of Change
1.0.0	June 2023	Moshe Greenberg	Policy Creation
1.0.1	July 2024	Moshe Greenberg	Expansion of Holiday Schedule details and broadening to include Market Closures for any reason

## Disclaimer

The Indices and associated policies and documents are proprietary to VettaFi. No use or publication may be made of an Index, or any of its provisions or values, without the prior written consent of VettaFi. VettaFi is not responsible for any errors or omissions, regardless of the cause, for the results obtained from the use of the Content. In no event shall VettaFi be liable to any party for any direct, indirect, incidental, exemplary, compensatory, punitive, special, or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs) in connection with any use of the Content.