



## Conflicts of Interest Policy

VettaFi takes steps to identify, prevent and adequately manage existing or potential conflicts of interests involving a material risk of damage to its indexes as well as its customers' and stakeholders' interests. A conflict of interests arises when VettaFi or its employees' and owners' interests may lead to index decisions by VettaFi that may conflict with interests of VettaFi's stakeholders or clients.

VettaFi has an Independent Governance structure responsible for protecting against conflicts of interest. Index Governance has authority over the Index Function. The Head of Index Governance is independent of commercial functions. Additionally, remuneration is competitive and independent of Index performance.

Additionally, VettaFi has policies that proactively protect against Conflicts of Interest:

- Conflicts of Interest Register: Reviewed annually and updated on an ongoing basis.
- Trading Policy: Restrictions to prevent taking advantage of Material Non-Public Information.
- Gift Policy
- Outside Employment and Activities Policy
- Disclosure of Outside Activities
- Whistleblowing Policy

### 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.0.0	Aug 2024	Jul 2025	Moshe Greenberg	Index Governance and Index Committee
1.0.0	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