



## Index Policies

The Index Committee (IC) establishes policies and procedures to meet its stated criteria, index maintenance and rebalances. It requires indices and their methodologies to be reviewed at least every two years 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 also reviews the exercise of Expert Judgement.

### 1. Expert Judgement

Expert Judgement refers to decisions made by the Index Product Team or the Index Committee based on their expert opinion in managing an index. It also refers to actions that are not found in the Index methodology or are an exception to that methodology that are taken on behalf of the Index in the best interest of the Index.

Indexes are rule based and designed to eliminate or minimize the need for Expert Judgement. Expert judgement is needed infrequently and is generally needed as a response to certain corporate actions, a distressed market, or unexpected changes in the operational environment.

However, situations may occur where Expert Judgement is used to make decisions in the best interest of the Index .

In situations where the minimum data requirements for calculating an index cannot be met, Index Governance will evaluate whether Expert Judgement can be used to calculate the index or whether the index is no longer viable.

In cases where pricing from recognized exchanges or secondary sources is not available, or not deemed reliable, the Index Product team will use its Expert Judgement to determine pricing.

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.

Expert Judgement may also be used in managing the index in response to corporate actions, market or other events, where it deems it necessary to best meet the objectives of the index. The use of Expert Judgement is done on an infrequent exceptional basis.

Uses of Expert Judgement are reviewed by the Index Committee and stakeholders are notified of the use of Expert Judgement as soon as operationally possible through publication online or email communication.

## 2. Index Committee Approval

When necessary for the continuation of Index Calculation, Index decisions may be made in anticipation of the needed Index Committee approval.

## 3. 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.

## 4. 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. Significance is judged based on the perspective of the index stakeholders. Incorrect intraday ticks of the index resulting from data errors will not be corrected.

## 5. Methodology Documents

Methodologies and their associated documents represent the rules and processes used in producing EOD index values.

## 6. Audits

Index Governance will annually review its adherence to its policies. It will also engage periodically for an independent external assurance on its adherence and assist the external auditor in reviewing all categories of indexes.

## 7. Retention

All documents, data, and emails will be retained for a minimum of five years. Backups are made on a regular basis and as part of a DR process all server contents are mirrored to a secondary site.

## 8. Regulators

VettaFi, where permitted legally based on its legal counsel assessment, will support and comply with regulatory requests.

## 9. Conflicts of Interest

Index Members are required to report to Index Governance any possible Conflicts of Interest and to remove themselves from participation in any decisions where a conflict of interest exists or to follow procedures as defined by Legal that mitigate the effect of the conflicts.

Annually, Index Governance will evaluate potential Conflict Of Interests and of Conflicts of Interest disclosures by Index Governance. The Index Committee and Legal may be consulted in cases where guidance is needed to decide on the presence of a COI.

A conflict of interest is deemed to be present if the member has any direct or indirect financial interest in the outcome of a decision. Additionally, any responsibility for an entity that may be affected by a committee decision constitutes a conflict. A conflict also exists if a family member that lives with a member or is dependent on a member has any direct or indirect financial interest in the outcome of a decision.

Conflicts of Interest are controlled by excluding a member with a conflict from voting. Members with conflicts may participate in committee discussions, but not vote, after declaring their conflict.

## 10. Benchmark Minimum Requirements and Limitations

Index calculation is dependent on VettaFi's ability to source accurate pricing data. Where there is widespread unavailability of reliable prices due to market events the index may not be calculatable. Thematic and Factor indexes that employ classification systems or specific sets of data are dependent on VettaFi's ability to obtain these classifications or data elements. Indexes are also subject to not having sufficient constituents that meet its criteria or may become un-investable for its stakeholders due to the concentration of its holdings. VettaFi's exposure to insufficient data is limited because all its pricing comes from recognized major exchanges.

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
1.0.1	Jul 2024	Jul 2025	Moshe Greenberg	Index Governance and Index Committee
1.0.2	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
1.0.1	July 2024	Moshe Greenberg	Expansion of Holiday Schedule details and broadening to include Market Closures for any reason
1.0.2	July 2025	Moshe Greenberg	Added: Expert Judgement may also be used in managing the index in response to corporate actions, market or other events, where it deems it necessary to best meet the objectives of the index. The use of Expert Judgement is done on an infrequent exceptional basis.