



Index Changes and Consultation Guidelines

Criteria:

VettaFi may make changes to an index's methodology to best meet its stated objective. The need for these changes may be the result of a methodology review, external input, changes in the market, effectiveness of the index, challenges with inputs, and other reasons that may make index calculation difficult or impossible. These changes need to be approved by the Index Committee based on a sound analysis of the effectiveness and appropriateness of the proposed changes in meeting the index objectives and representing its interest.

VettaFi's Index Governance Committee will conduct Index Consultations when it contemplates material changes to an index methodology that is estimated to significantly change the holdings or to change its process. Material changes are changes estimated to have at least a 15% change in target constituent weights. A change would also be considered material if major changes are made to the content of the methodology that would be reasonably considered material by the index's stakeholders (i.e. through a change in the captured investable universe). VettaFi, at its own discretion may conduct Index Consultations that do not meet these criteria. VettaFi will not conduct consultations for non-methodology related changes such as Corporate Actions and Use of Expert Judgement. VettaFi will only conduct consultations if there are stakeholders.

Index Changes:

All Index methodology changes are implemented with Index Committee approval. Changes that are clarifications to existing methodology are an exception and do not need approval. Changes that reasonably would be considered material will be announced to licensees with a minimum of two weeks' notice when possible. All changes will be posted in updated published methodologies that are maintained on VettaFi's website.

Index Consultation Results, Distribution, and Timing:

VettaFi will concurrently post consultations on its website and email its list of stakeholders and licensees. In some instances, based on likely impact and product base, it will also publish a news release. Consultations will run for 10 days and will include a consultation close date which the Index Committee may extend. If the consultation results in a change, the change will be announced in the same fashion as the consultation with a minimum of 2 weeks' notice. Announcements will include details of changes to be enacted as well as an effective date for the changes. In certain cases, it may be necessary to enact changes in shorter time periods. This is expected to be rare and only in an emergency to respond to real-time market conditions and to best reflect continuing to meet the stated objective of the index. In such instances as much notice as possible will be given.

Format and Content of Consultation and Consultation Results:

Consultations will have targeted choices but will also allow for free form responses. They will include a consultation close date that may be extended.

The Index Committee considers the results of the consultation to make informed decisions on index methodology and governance. Index decisions related to consultation, but not consultation responses, will be published. VettaFi puts extensive work into its consultations delineating all the salient pros and cons and an additional layer of responding to comments and publicizing responses is overly burdensome given our size and the number of our stakeholders. VettaFi has a small set of stakeholders that can reach out at any time to express concerns.

Review:

Version	1.0.0
Reviewed by	Index Governance and Index Committee
Review Date	June 2023
Next Review	June 2024
Review Date	July 2024
Next Review	Jun 2025

Changes:

Version	Date	Author/Editor	Summary of Change
1.0.0	June 2023	Moshe Greenberg	Policy Creation
1.1.0	June 2023	Moshe Greenberg	Consultation response policy added and explained.
1.1.1	July 2023	Moshe Greenberg	Annual Review