



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	1.0.0
Reviewed by	Index Governance and Legal
Review Date	June 2023
Next Review	June 2024
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Changes:

Version	Date	Author/Editor	Summary of Change
1.0.0	June 2023	Moshe Greenberg	Policy Creation
1.0.1	Aug 2023	Moshe Greenberg	Annual Review