

Compliance Requirements for Parties with access to Confidential and MNPI Index Information

These requirements are designed to protect the confidential and material non-public information of iINDEX Research and Development Indices Ltd. (“iINDEX”) business. Confidential information includes but is not limited to product designs, research, technical specifications, index methodologies, index algorithms, index formulas, index rulebooks, and index operations. Material non-public information includes but is not limited to non-public changes or contemplated index methodology changes and non-public proforma index constituent information.

Parties with access to confidential and material non-public information must protect their confidentiality. Information may only be shared within the company with parties involved in the development of an index, members of relevant index committees, index governance, and operations staff producing these indices. Externally, confidential information may only be shared with the approval of the relevant Index Committee or Index Governance.

Parties are responsible to report any business interests or connections that pose a conflict of interest or a perception of a conflict of interest in the benchmark determination process.

Parties may not trade, influence others to trade, or share information that may influence others to trade based on non-public information to which they have access.

All Index Committee (Voting and Not Voting) and Index Product members may not invest in MLPs without explicit permission from Legal. Exceptions may be made with explicit approval from Legal and Index Governance and will also require Quarterly Holdings disclosures.

Index Product members will be restricted from security trading during rebalance and reconstitution periods. The dates of these periods will be published. These periods are not set and may change. Exceptions may be made with explicit approval from Legal and Index Governance and will also require some holdings disclosures.

All parties will need to annually affirm that they are in compliance with the above policy.



This document outlines the policy of iINDEX Research and Development Indices Ltd., which is directed and supervised by VettaFi LLC. iINDEX Research and Development Indices Ltd. and VettaFi LLC are both group companies of TMX Group Ltd. VettaFi LLC delegates certain responsibilities and activities to iINDEX Research and Development Indices Ltd. as outlined within this document.

Review

Version	Reviewed	Next Review	Reviewed and Approved By
1.0.0	Sep 2025	Sep 2026	Index Committee

Changes

Disclaimer

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