

Conflicts of Interest Policy

iINDEX Research and Development Indices Ltd. (“iINDEX”) 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 iINDEX or its employees’, owners’, data providers’ and any related party’s interests may lead to index decisions by iINDEX that may conflict with interests of iINDEX's stakeholders or clients.

iINDEX 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, iINDEX 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

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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