

S&P Daily Risk Control Put Protection Index Series *Methodology*

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Introduction

Index Objective and Highlights

The S&P Daily Risk Control Put Protection Index Series consists of Overlay Indices and Composite Indices:

- Overlay Indices isolate and measure the performance of long positions in short-term, synthetic put options on underlying S&P Daily Risk Control Indices.
- Composite indices measure the performance of long positions in a combination of the synthetic put indices and their corresponding Daily Risk Control Indices.

The primary parameters that define the protective put strategy for each index in the series are the underlying index, the daily risk control target volatility, and the daily strike ratio. The index series consists of the following:

Index Name	Index Type	Underlying S&P Daily Risk Control Index	Underlying Risk Control Target Volatility ¹	Daily Strike Ratio ²
S&P 500 10% Daily Risk Control 90% Put Protection Index (USD) NTR	Overlay Index	S&P 500 10% Daily Risk Control Index (NTR)	10%	90%
S&P 500 10% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	Composite Index			
S&P 500 18% Daily Risk Control 90% Put Protection Index (USD) NTR	Overlay Index	S&P 500 18% Daily Risk Control Index (NTR)	18%	90%
S&P 500 18% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	Composite Index			
S&P 500 10% Daily Risk Control 95% Put Protection Index (USD) NTR	Overlay Index	S&P 500 10% Daily Risk Control Index (NTR)	10%	95%
S&P 500 10% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	Composite Index			
S&P 500 18% Daily Risk Control 95% Put Protection Index (USD) NTR	Overlay Index	S&P 500 18% Daily Risk Control Index (NTR)	18%	95%
S&P 500 18% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	Composite Index			
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Index (AUD) TR	Overlay Index	S&P/ASX 200 TR Daily Risk Control 10% Index (AUD) TR	10%	95%
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Composite Index (AUD) TR	Composite Index			
S&P Europe 350 18% Daily Risk Control 95% Put Protection Index (EUR) NTR	Overlay Index	S&P Europe 350 NTR Daily Risk Control 18% Index (EUR) TR	18%	95%
S&P Europe 350 18% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	Composite Index			
S&P Europe 350 10% Daily Risk Control 95% Put Protection Index (EUR) NTR	Overlay Index	S&P Europe 350 NTR Daily Risk Control 10% Index (EUR) TR	10%	95%
S&P Europe 350 10% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	Composite Index			

For information on the underlying indices, please refer to their respective index methodologies available at www.spglobal.com/spdji/.

Please refer to Index Construction for details on the approach of each index and its calculation.

¹ Please refer to S&P Dow Jones Indices' Index Mathematics Methodology document for details on the index series' calculation.

² The daily strike ratio is used to determine the strike price of each synthetic put option on purchase date with respect to the prior day's value of the underlying S&P Daily Risk Control Index. For the avoidance of doubt, the daily strike ratio does not represent the absolute level of protection offered by the strategy. Market conditions, including interest rates and the trailing performance of the underlying index, will affect the level of protection offered by the strategy at any given point.

Supporting Documents

This methodology is meant to be read in conjunction with supporting documents providing greater detail with respect to the policies, procedures and calculations described herein. References throughout the methodology direct the reader to the relevant supporting document for further information on a specific topic. The list of the main supplemental documents for this methodology and the hyperlinks to those documents is as follows:

Supporting Document	URL
S&P Dow Jones Indices' Options Indices Policies and Practices Methodology	Options Indices Policies & Practices
S&P Dow Jones Indices' Index Mathematics Methodology	Index Mathematics Methodology

This methodology was created by S&P Dow Jones Indices to achieve the aforementioned objective of measuring the underlying interest of each index governed by this methodology document. Any changes to or deviations from this methodology are made in the sole judgment and discretion of S&P Dow Jones Indices so that the index continues to achieve its objective.

Index Construction

Each index in the S&P Daily Risk Control Put Protection Index Series consists of 252 synthetic put options on the underlying S&P Risk Control Index (see *Index Series Parameters* table for details). The expiration date of each synthetic option is staggered, so that on each day an existing option expires a new option is purchased.

The daily performance of the put protection index is determined by the change in value of the non-expiring synthetic options held in the portfolio, plus the difference between the expired synthetic option's intrinsic value and the newly purchased synthetic option premium each day.

The strike level for each synthetic put option is determined by using a fixed percentage of the underlying Risk Control Index level (see *Index Series Parameters* table for details). The daily quantity of each synthetic put option is scaled on the purchase date in order to ensure that the aggregate portfolio collectively offers the intended level of protection. At any given point, this level of protection is therefore dependent on the trailing levels from the underlying S&P Daily Risk Control Index.³

Each synthetic option is priced using the standard Black-Scholes formula according to the present levels of the underlying Risk Control index. As the existing S&P Risk Control indices dynamically adjust exposure on a daily basis to an underlying index in an attempt to control the level of volatility, then each synthetic put option can be priced with an assumed implied volatility corresponding to the underlying's target level.⁴

Index Level Calculations

On any business day t when an index in the series is calculated, the index values are calculated using the following formulas:

$$\text{Composite Index}_{t=0} = 100$$

$$\text{Composite Index}_t = \text{Composite Index}_{t-1} \times \left[1 + \left(\frac{\text{Overlay Index}_t}{\text{Overlay Index}_{t-1}} - 1 \right) + \left(\frac{\text{Underlying RCIndex}_t}{\text{Underlying RCIndex}_{t-1}} - 1 \right) \right]$$

$$\text{Overlay Index}_{t=0} = 100$$

$$\text{Overlay Index}_t = \text{Overlay Index}_{t-1} + \Delta \text{Portfolio Option Value}_t + \text{Expiring Option Value}_t - \text{New Option Value}_t$$

where:

$$\text{Underlying RCIndex}_t = \text{Level of the S\&P Daily Risk Control Index using the underlying index and target volatility, } \sigma, \text{ at business day, } t$$

³ For the avoidance of doubt, the daily strike ratio does not represent the absolute level of protection offered by the strategy. Market conditions, including interest rates and the trailing performance of the underlying index, will affect the level of protection offered by the strategy at any given point.

⁴ With the exception of the additional transaction volatility cost applied only on each option purchase date. Transaction volatility cost refers to the increase in volatility used to calculate the daily synthetic option premium on purchase date only. See *Index Series Parameters* table for more information.

Hypothetical Portfolio Value and Option Quantity Calculations

On any business day t when an index in the series is calculated, the theoretical value of the synthetic options portfolio, expiring option value and new option value and quantity is calculated as follows:

$\Delta Portfolio Option Value_t$ = The change over the past business day in the theoretical value of the hypothetical option portfolio, at time t , is calculated as:

$$\Delta Portfolio Option Value_t = Portfolio Option Value_t - Portfolio Option Value_{t-1}$$

where:

$Portfolio Option Value_t$ = The sum of the theoretical values of all the unexpired options in the hypothetical option portfolio, at time t , and is calculated as:

$$Portfolio Option Value_t = \sum_{d=t-(M-1)}^t Q_d \times Value_t(Put Option_d)$$

where:

M = The number of unexpired, synthetic put options in the portfolio at any given time (equivalent to the maturity of each new synthetic put option, expressed in index business days)

$Value_t(Put Option_d)$ = The theoretical value, on business day t , of the synthetic put option purchased on business day d

$Option Quantity, Q_d$ = The quantity of the synthetic put option purchased on business day d is calculated as:

$$Option Quantity, Q_d = \frac{Overlay Index_{d-1}}{M \times Underlying RCIndex_d}$$

$Expiring Option Value_t$ = The intrinsic value of the synthetic put option purchased on day d is calculated as:

$$Expiring Option Value_t = Q_{t-M} \times Maximum\{0, Strike_{t-M} - Underlying RCIndex_t\}$$

where:

$Strike_d$ = The strike price of the synthetic put option purchased on business day d , and is calculated as:

$$Strike_d = Daily Strike Ratio \times Underlying RCIndex_d$$

where:

Daily Strike Ratio = A fixed percentage (see *Index Series Parameters* table) used to determine the strike price of each synthetic put option

$New Option Value_t$ = The value of the synthetic option purchased on business day, t , is calculated as follows:

$$New Option Value_t = Q_t \times value_t(Put Option_t)$$

Theoretical Option Value Calculations

On any business day t when an index in the series is calculated, the theoretical value of each unexpired synthetic put option purchased on their respective business day d is calculated using the standard Black-Scholes as follows:

$$Value_t(Put Option_d) = Strike_d \times e^{-r_t T_t(Put Option_d)} \times N(-d2_{t,d}) - Underlying RCIndex_t \times N(-d1_{t,d})$$

where:

$$d1_{t,d} = \frac{1}{\sigma \sqrt{T_t(Put Option_d)}} \left[\ln \left(\frac{Underlying RCIndex_t}{Strike_d} \right) + (r_t + \sigma^2/2) \times T_t(Put Option_d) \right]$$

$$d2_{t,d} = d1_{t,d} - \sigma \sqrt{T_t(Put Option_d)}$$

$N(x)$ = the cumulative distribution function for a standard normal distribution with mean 0 and standard deviation of 1 at x .

r_t = continuously compounded 12-month interest rate at business day, t

$$\sigma = \begin{cases} \text{underlying index risk control target volatility} + \text{transaction volatility cost}, & \text{if } t = d \\ \text{underlying index risk control target volatility}, & \text{if } t > d \end{cases}$$

$T_t(Put Option_d)$ = Time to maturity, expressed in years, for the synthetic put option purchased on business day, d , as of business day, t , is calculated as:

$$T_t(Put Option_d) = \frac{\text{Calendar days from and excluding business day, } t, \text{ to and including business day, } d + M}{\text{Calendar days in one year following business day, } t}$$

Index Series Parameters

The S&P Daily Risk Control Put Protection Index Series consists of the following indices with their corresponding parameters:

Index Name	Index Type	Underlying S&P Daily Risk Control Index	Underlying Risk Control Target Volatility, σ	Number of Synthetic Put Options in Portfolio, M	Daily Strike Ratio	Interest Rate, r (for option pricing)	Transaction Volatility Cost ⁵
S&P 500 10% Daily Risk Control 90% Put Protection Index (USD) NTR	Overlay Index	S&P 500 10% Daily Risk Control Index (NTR)	10%	252	90%	SOFR Overnight + 0.24263%	150bps
S&P 500 10% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	Composite Index						
S&P 500 18% Daily Risk Control 90% Put Protection Index (USD) NTR	Overlay Index	S&P 500 18% Daily Risk Control Index (NTR)	18%	252	90%	SOFR Overnight + 0.24263%	150bps
S&P 500 18% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	Composite Index						
S&P 500 10% Daily Risk Control 95% Put Protection Index (USD) NTR	Overlay Index	S&P 500 10% Daily Risk Control Index (NTR)	10%	252	95%	SOFR Overnight + 0.24263%	150bps
S&P 500 10% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	Composite Index						
S&P 500 18% Daily Risk Control 95% Put Protection Index (USD) NTR	Overlay Index	S&P 500 18% Daily Risk Control Index (NTR)	18%	252	95%	SOFR Overnight + 0.24263%	150bps
S&P 500 18% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	Composite Index						
S&P Europe 350 18% Daily Risk Control 95% Put Protection Index (EUR) NTR	Overlay Index	S&P Europe 350 NTR Daily Risk Control 18% Index (EUR) TR	18%	252	95%	12-Month EURIBOR	150bps
S&P Europe 350 18% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	Composite Index						

⁵ Transaction volatility cost refers to an increase in the volatility input used to calculate the daily synthetic option premium on the purchase date only. Transaction volatility cost accounts for a hypothetical transaction cost that hypothetically would be paid to execute such an over-the-counter option.

Index Name	Index Type	Underlying S&P Daily Risk Control Index	Underlying Risk Control Target Volatility, σ	Number of Synthetic Put Options in Portfolio, M	Daily Strike Ratio	Interest Rate, r (for option pricing)	Transaction Volatility Cost ⁶
S&P Europe 350 10% Daily Risk Control 95% Put Protection Index (EUR) NTR	Overlay Index	S&P Europe 350 NTR Daily Risk Control 10% Index (EUR) TR	10%	252	95%	12-Month EURIBOR	150bps
S&P Europe 350 10% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	Composite Index						
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Index (AUD) TR	Overlay Index	S&P/ASX 200 TR Daily Risk Control 10% Index (AUD) TR	10%	252	95%	6-Month Australian Bank Bills	150bps
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Composite Index (AUD) TR	Composite Index						

⁶ Transaction volatility cost refers to an increase in the volatility input used to calculate the daily synthetic option premium on the purchase date only. Transaction volatility cost accounts for a hypothetical transaction cost that typically would be paid to execute such an over-the-counter option.

Index Maintenance

Rebalancing

The underlying Risk Control indices for the Put Protection Index Series rebalance according to the schedules outlined in their respective methodologies.

For more information on the rebalancing process of the underlying indices, please refer to their respective index methodologies available at www.spglobal.com/spdji/.

Option Rolls

The index rolls into a new option and settles an expiring option on a daily basis.

Currency of Calculation and Additional Index Return Series

Each index is calculated in the currency of its respective underlying index: U.S. dollars, euros, and Australian dollars.

In addition to the indices detailed in this methodology, additional return series versions of the indices may be available, including, but not limited to: currency, currency hedged, decrement, fair value, inverse, leveraged, and risk control versions. For a list of available indices, please refer to [S&P DJI's All Indices by Methodology Report](#).

For information on the index calculation, please refer to S&P Dow Jones Indices' Index Mathematics Methodology.

For the inputs necessary to calculate certain types of indices, including decrement, dynamic hedged, fair value, and risk control indices, please refer to the Parameters documents available at www.spglobal.com/spdji/.

Base Date and History Availability

Index history availability, base dates, and base values are shown in the table below.

Index	Launch Date	First Value Date	Base Date	Base Value
S&P 500 10% Daily Risk Control 90% Put Protection Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P 500 10% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P 500 18% Daily Risk Control 90% Put Protection Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P 500 18% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P 500 10% Daily Risk Control 95% Put Protection Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P 500 10% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P 500 18% Daily Risk Control 95% Put Protection Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P 500 18% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P Europe 350 18% Daily Risk Control 95% Put Protection Index (EUR) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P Europe 350 18% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P Europe 350 10% Daily Risk Control 95% Put Protection Index (EUR) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P Europe 350 10% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	11/13/2019	05/26/2000	05/26/2000	100
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Index (AUD) TR	11/13/2019	08/30/2001	08/30/2001	100
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Composite Index (AUD) TR	11/13/2019	08/30/2001	08/30/2001	100

Index Governance

Index Committee

The indices are maintained by an S&P Dow Jones Indices Index Committee. The Committee meets regularly. At each meeting, the Committee reviews matters that may affect index constituents, statistics comparing the composition of the index to the market, and any significant market events. In addition, the Index Committee may revise index policy covering rules for selecting constituents, or other matters.

S&P Dow Jones Indices considers information about changes to its indices and related matters to be potentially market moving and material. Therefore, all Index Committee discussions are confidential.

S&P Dow Jones Indices' Index Committees reserve the right to make exceptions when applying the methodology if the need arises. In any scenario where the treatment differs from the general rules stated in this document or supplemental documents, clients will receive sufficient notice, whenever possible.

In addition to the daily governance of indices and maintenance of index methodologies, at least once within any 12-month period, the Index Committee reviews the methodology to ensure the indices continue to achieve the stated objectives, and that the data and methodology remain effective. In certain instances, S&P Dow Jones Indices may publish a consultation inviting comments from external parties.

For information on Quality Assurance and Internal Reviews of Methodology, please refer to S&P Dow Jones Indices' Options Indices Policies and Practices Methodology.

Index Policy

Holiday Schedule

The indices are calculated on all equity market business days in their respective underlying markets.

A complete holiday schedule for the year is available at www.spglobal.com/spdji/.

Rebalancing

The Index Committee may change the date of a given rebalancing for reasons including market holidays occurring on or around the scheduled rebalancing date. Any such change will be announced with proper advance notice where possible.

Unexpected Exchange Closures

For information on Unexpected Exchange Closures, please refer to S&P Dow Jones Indices' Options Indices Policies & Practices Methodology.

Recalculation Policy

For information on the recalculation policy, please refer to S&P Dow Jones Indices' Options Indices Policies & Practices Methodology.

For information on Calculations and Pricing Disruptions, Expert Judgment and Data Hierarchy, please refer to S&P Dow Jones Indices' Options Indices Policies & Practices Methodology.

Theoretical Option's Value Calculation

For further information on S&P Dow Jones Indices theoretical options calculation, please refer to S&P Dow Jones Indices' Options Indices Policies & Procedures Methodology.

Contact Information

For questions regarding an index, please contact: index_services@spglobal.com.

Index Dissemination

Index levels are available through S&P Dow Jones Indices' Web site at www.spglobal.com/spdji/, major quote vendors (see codes below), numerous investment-oriented Web sites, and various print and electronic media.

Tickers

The table below lists headline indices covered by this document. All versions of the below indices that may exist are also covered by this document. Please refer to [S&P DJI's All Indices by Methodology Report](#) for a complete list of indices covered by this document.

Index	BBG	RIC
S&P 500 10% Daily Risk Control 90% Put Protection Index (USD) NTR	SPRP1090	.SP10R90P
S&P 500 10% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	SPRC1090	.SP10RC90P
S&P 500 18% Daily Risk Control 90% Put Protection Index (USD) NTR	SPRP1890	.SP18R90P
S&P 500 18% Daily Risk Control 90% Put Protection Composite Index (USD) NTR	SPRC1890	.SP18RC90P
S&P 500 10% Daily Risk Control 95% Put Protection Index (USD) NTR	SPRP1095	.SP10R95P
S&P 500 10% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	SPRC1095	.SP10RC95P
S&P 500 18% Daily Risk Control 95% Put Protection Index (USD) NTR	SPRP1895	.SP18R95P
S&P 500 18% Daily Risk Control 95% Put Protection Composite Index (USD) NTR	SPRC1895	.SP18RC95P
S&P Europe 350 18% Daily Risk Control 95% Put Protection Index (EUR) NTR	SEPP1895	.SEPP1895
S&P Europe 350 18% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	SEPC1895	.SEPC1895
S&P Europe 350 10% Daily Risk Control 95% Put Protection Index (EUR) NTR	SEPP1095	.SEPP1095
S&P Europe 350 10% Daily Risk Control 95% Put Protection Composite Index (EUR) NTR	SEPC1095	.SEPC1095
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Index (AUD) TR	SAPP1095	.SAPP1095
S&P/ASX 200 10% Daily Risk Control 95% Put Protection Composite Index (AUD) TR	SAPC1095	.SAPC1095

Index Data

Daily stock level and index data are available via subscription.

For product information, please contact S&P Dow Jones Indices, www.spglobal.com/spdji/en/contact-us.

Web site

For further information, please refer to S&P Dow Jones Indices' Web site at www.spglobal.com/spdji/.

Appendix

Methodology Changes

Methodology changes since November 13, 2019, are as follows:

Change	Effective Date (After Close)	Previous	Methodology Updated
USD Interest Rate Replacement	12/17/2021	12-Month USD Libor	SOFR Overnight + 0.24263%
EUR Interest Rate Replacement	11/22/2021	12-Month EUR LIBOR	12-Month EURIBOR

Disclaimer

Performance Disclosure/Back-Tested Data

Where applicable, S&P Dow Jones Indices and its index-related affiliates (“S&P DJI”) defines various dates to assist our clients in providing transparency. The First Value Date is the first day for which there is a calculated value (either live or back-tested) for a given index. The Base Date is the date at which the index is set to a fixed value for calculation purposes. The Launch Date designates the date when the values of an index are first considered live: index values provided for any date or time period prior to the index’s Launch Date are considered back-tested. S&P DJI defines the Launch Date as the date by which the values of an index are known to have been released to the public, for example via the company’s public website or its data feed to external parties. For Dow Jones-branded indices introduced prior to May 31, 2013, the Launch Date (which prior to May 31, 2013, was termed “Date of introduction”) is set at a date upon which no further changes were permitted to be made to the index methodology, but that may have been prior to the Index’s public release date.

Please refer to the methodology for the Index for more details about the index, including the manner in which it is rebalanced, the timing of such rebalancing, criteria for additions and deletions, as well as all index calculations.

Information presented prior to an index’s launch date is hypothetical back-tested performance, not actual performance, and is based on the index methodology in effect on the launch date. However, when creating back-tested history for periods of market anomalies or other periods that do not reflect the general current market environment, index methodology rules may be relaxed to capture a large enough universe of securities to simulate the target market the index is designed to measure or strategy the index is designed to capture. For example, market capitalization and liquidity thresholds may be reduced. In addition, forks have not been factored into the back-test data with respect to the S&P Cryptocurrency Indices. For the S&P Cryptocurrency Top 5 & 10 Equal Weight Indices, the custody element of the methodology was not considered; the back-test history is based on the index constituents that meet the custody element as of the Launch Date. Back-tested performance reflects application of an index methodology and selection of index constituents with the benefit of hindsight and knowledge of factors that may have positively affected its performance, cannot account for all financial risk that may affect results and may be considered to reflect survivor/look ahead bias. Actual returns may differ significantly from, and be lower than, back-tested returns. Past performance is not an indication or guarantee of future results.

Typically, when S&P DJI creates back-tested index data, S&P DJI uses actual historical constituent-level data (e.g., historical price, market capitalization, and corporate action data) in its calculations. As ESG investing is still in early stages of development, certain datapoints used to calculate certain ESG indices may not be available for the entire desired period of back-tested history. The same data availability issue could be true for other indices as well. In cases when actual data is not available for all relevant historical periods, S&P DJI may employ a process of using “Backward Data Assumption” (or pulling back) of ESG data for the calculation of back-tested historical performance. “Backward Data Assumption” is a process that applies the earliest actual live data point available for an index constituent company to all prior historical instances in the index performance. For example, Backward Data Assumption inherently assumes that companies currently not involved in a specific business activity (also known as “product involvement”) were never involved historically and similarly also assumes that companies currently involved in a specific business activity were involved historically too. The Backward Data Assumption allows the hypothetical back-test to be extended over more historical years than would be feasible using only actual data. For more information on “Backward Data Assumption” please refer to the FAQ. The methodology and factsheets of any index that employs backward assumption in the back-tested history will explicitly state so. The methodology will include an Appendix with a table setting forth the specific

data points and relevant time period for which backward projected data was used. Index returns shown do not represent the results of actual trading of investable assets/securities. S&P DJI maintains the index and calculates the index levels and performance shown or discussed but does not manage any assets.

Index returns do not reflect payment of any sales charges or fees an investor may pay to purchase the securities underlying the Index or investment funds that are intended to track the performance of the Index. The imposition of these fees and charges would cause actual and back-tested performance of the securities/fund to be lower than the Index performance shown. As a simple example, if an index returned 10% on a US \$100,000 investment for a 12-month period (or US \$10,000) and an actual asset-based fee of 1.5% was imposed at the end of the period on the investment plus accrued interest (or US \$1,650), the net return would be 8.35% (or US \$8,350) for the year. Over a three-year period, an annual 1.5% fee taken at year end with an assumed 10% return per year would result in a cumulative gross return of 33.10%, a total fee of US \$5,375, and a cumulative net return of 27.2% (or US \$27,200).

Intellectual Property Notices/Disclaimer

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