

S&P Dow Jones Indices

A Division of **S&P Global**

S&P GARP Indices *Methodology*

September 2025

Table of Contents

Introduction	3
Index Objective and Highlights	3
Index Family	3
Supporting Documents	4
Eligibility Criteria	5
Index Universe	5
Eligibility Factors	5
Index-Specific Eligibility Factors	5
Index Construction	7
S&P 500 GARP Index, S&P MidCap 400 GARP Index, S&P SmallCap 600 GARP Index, and S&P 500 GARP 100 Index	7
S&P 500 GARP 100 Index	8
S&P 500 Innovation GARP Index	9
S&P/ASX 200 GARP Index	10
S&P World Ex-Australia GARP Index	11
Index Maintenance	13
Index Calculations	13
Rebalancing	13
Additions and Deletions	13
Corporate Actions	13
Currency of Calculation and Additional Index Return Series	13
Other Adjustments	14
Base Date and History Availability	14
Index Data	15
Calculation Return Types	15
Index Governance	16
Index Committee	16
Index Policy	17
Announcements	17
Pro-forma Files	17
Holiday Schedule	17
Rebalancing	17
Unexpected Exchange Closures	17
S&P Dow Jones Indices: S&P GARP Indices Methodology	1

	Recalculation Policy	17
	Contact Information	17
Index Dissemination		18
	Tickers	18
	Index Data	18
	Website	18
Appendix A		19
	Fundamental Ratios Calculation	19
Appendix B		21
	Z-score and Growth (or Growth and R&D) Score Computation	21
Appendix C		22
	Methodology Changes	22
Appendix D		23
	ESG Disclosures	23
Disclaimer		24
	Performance Disclosure/Back-Tested Data	24
	Intellectual Property Notices/Disclaimer	25
	ESG Indices Disclaimer	27

Introduction

Index Objective and Highlights

The S&P GARP (Growth at a Reasonable Price) Indices measure the performance of the top growth stocks with high quality and value composite scores selected from the respective underlying index universe.

For the S&P 500 GARP Index, S&P MidCap 400 GARP Index, S&P SmallCap 600 GARP Index, and S&P 500 GARP 100 Index, the indices select constituents based on earnings-per-share (EPS) and/or sales-per-share (SPS) growth, as well as financial leverage, return on equity, and earnings to price valuations. Index constituents are Growth Score weighted, subject to the capping constraints defined in *Constituent Weightings*.

For the S&P 500 Innovation GARP Index, the index selects constituents based on earnings-per-share (EPS), sales-per-share (SPS) growth, and R&D expenditure to enterprise value ratio, as well as free cash flow to revenue ratio, free cash flow to debt ratio and earnings to price valuations. Index constituents are Growth Score weighted.

For the S&P/ASX 200 GARP Index, the index selects constituents based on earnings-per-share (EPS) and/or sales-per-share (SPS) growth, as well as return on equity and earnings to price valuations. Index constituents are float-adjusted market capitalization (FMC) * QV Score weighted, subject to the capping constraints defined in *Constituent Weightings*.

For the S&P World Ex-Australia GARP Index, the index selects constituents based on earnings-per-share (EPS) and/or sales-per-share (SPS) growth, as well as financial leverage, return on equity, and earnings to price valuations. Index constituents are FMC * Growth Score weighted, subject to the capping constraints defined in *Constituent Weightings*.

Index Family

- **S&P 500 GARP Index.** The index measures the performance of the top 75 growth stocks with high quality and value composite scores within the S&P 500 (the underlying index).
- **S&P MidCap 400 GARP Index.** The index measures the performance of the top 60 growth stocks with high quality and value composite scores within the S&P MidCap 400 (the underlying index).
- **S&P SmallCap 600 GARP Index.** The index measures the performance of the top 90 growth stocks with high quality and value composite scores within the S&P SmallCap 600 (the underlying index).
- **S&P 500 GARP 100 Index.** The index measures the performance of the top 100 growth stocks with high quality and value composite scores within the S&P 500 (the underlying index).
- **S&P 500 Innovation GARP Index.** The index measures the performance of the top 100 growth stocks with high R&D expenditure, FCF quality, and value composite scores within the S&P 500 (the underlying index).
- **S&P/ASX 200 GARP Index.** The index measures the performance of the top 50 growth stocks with high quality and value composite scores within the S&P/ASX 200 (the underlying index).
- **S&P World Ex-Australia GARP Index.** The index measures the performance of the top 250 growth stocks with high quality and value composite scores within the S&P Developed LargeMidCap (the underlying index), excluding stocks from Korea and Australia.

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

For information on Growth Score calculation, please refer to Appendix B.

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, are as follows:

Supporting Document	URL
S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology	Equity Indices Policies & Practices
S&P Dow Jones Indices' Index Mathematics Methodology	Index Mathematics Methodology
S&P Dow Jones Indices' Global Industry Classification Standard (GICS) Methodology	GICS 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.

Eligibility Criteria

Index Universe

As of each rebalancing reference date, the index universe for each index is all constituents of the underlying index.

Index	Underlying Index
S&P 500 GARP Index	S&P 500
S&P MidCap 400 GARP Index	S&P MidCap 400
S&P SmallCap 600 GARP Index	S&P SmallCap 600
S&P 500 GARP 100 Index	S&P 500
S&P 500 Innovation GARP Index	S&P 500
S&P/ASX 200 GARP Index	S&P/ASX 200
S&P World Ex-Australia GARP Index	S&P Developed LargeMidCap

Eligibility Factors

As of the rebalancing reference date, stocks in the respective index universe must satisfy the following to be eligible:

- **Growth and Quality & Value (QV) Composite Scores:** have both a growth z-score and QV z-score.
- **Positive Underlying Current Three-Year Fiscal Year EPS:** have positive underlying EPS current fiscal year data point for a given stock's three-year EPS Growth.
- **Trading History:** have been trading for at least 10 months.
- **Multiple Share Classes.** Each company is represented once by the Designated Listing. For more information regarding the treatment of multiple share classes, please refer to Approach B within the Multiple Share Classes section of S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

Index-Specific Eligibility Factors

S&P 500 GARP Index, S&P MidCap 400 GARP Index, S&P SmallCap 600 GARP Index, S&P 500 GARP 100 Index, S&P/ASX 200 GARP Index, and S&P World Ex-Australia GARP Index. Stocks in the respective index universe must satisfy the following additional criteria to be eligible:

- **Positive Return on Equity (ROE):** have positive underlying EPS or book value per share (BVPS) for a given stock's ROE.

S&P 500 Innovation GARP Index. Companies classified under the GICS Code listed in the table below are not eligible:

GICS Code	GICS Name
60	Real Estate
40101010	Diversified Banks
40101015	Regional Banks
40201040	Specialized Finance
40203010	Asset Management & Custody Banks
40203020	Investment Banking & Brokerage
40204010	Mortgage REITs

GICS Code	GICS Name
40301010	Insurance Brokers
40301020	Life & Health Insurance
40301030	Multi-line Insurance
40301040	Property & Casualty Insurance
40301050	Reinsurance

S&P World Ex-Australia GARP Index. Stocks in the index universe must satisfy the following additional criteria to be eligible:

- **Domicile:** not be domiciled in South Korea or Australia.

Index Construction

S&P 500 GARP Index, S&P MidCap 400 GARP Index, S&P SmallCap 600 GARP Index, and S&P 500 GARP 100 Index

Constituent Selection. At each rebalancing, the index selects constituents according to the following process:

1. For all eligible stocks in the index universe compute a Growth z-score and Quality & Value (QV) composite z-score using the styles and factor components below:

Style	Factor Components ¹
Growth	(1) Three-year EPS growth (2) Three-year SPS growth
Quality & Value (QV) Composite	(1) Financial leverage ratio (Quality Factor) (2) Return on Equity (Quality Factor) (3) Earnings to Price Ratio (Value Factor)

Calculate the Growth z-score as the winsorized z-score² average of two factors: three-year EPS growth and three-year SPS growth. If the z-score for one factor cannot be properly calculated, use the z-score of the other factor as the growth z-score.

2. Calculate the QV composite z-score as the winsorized z-score average of three factors: financial leverage ratio, return on equity, and earnings to price ratio. A stock must have at least one of the quality factors and the value factor to calculate the QV composite score. If the z-score for one of the quality scores can't be properly calculated, use the z-score of the other quality factor. Rank stocks by Growth z-scores, with only the index-specific counts of Growth stocks defined below remaining eligible for index inclusion.
3. Rank the remaining eligible stocks by QV composite z-score, selecting the highest-ranking index-specific count of QV stocks defined below to form the index, subject to the selection buffer defined below.

Index	Growth Count	QV Count	Automatic Selection by QV Score	Current Constituents Selected by QV Score
S&P 500 GARP Index	150	75	60	61 - 90
S&P MidCap 400 GARP Index	120	60	48	49 - 72
S&P SmallCap 600 GARP Index	180	90	72	73 - 108
S&P 500 GARP 100 Index	200	100	80	81 - 120

Buffer Rule. The index applies a 20% selection buffer according to the following process:

1. Rank the top Growth z-score stocks by QV composite z-score, automatically selecting the highest ranking 80% for index inclusion.
2. Select current constituents ranking between the top 80% and top 120% by order of QV composite z-score until the target QV count is reached.
3. If the target QV count has not yet been met, select the highest ranking non-constituents in rank order, based on QV composite z-score, until the target count is reached.

¹ For more information on Fundamental Ratios calculations, please see *Appendix A*.

² For more information on z-score calculations, please see *Appendix B*.

Constituent Weightings. At each rebalancing, except for the S&P 500 GARP 100 Index, the indices Growth Score weight constituents, subject to the following constraints:

- a minimum security weight of 0.05%
- a single security weight cap of 5%
- a single GICS sector weight cap of 40%

Optimization Procedure. The weighting process uses an optimization procedure that chooses final weights in such a way to minimize the sum of the squared difference of capped weight and uncapped weight, divided by the uncapped weight for each stock.

S&P 500 GARP 100 Index

At each rebalancing, the index Growth Score * FMC weights constituents, subject to the following constraints:

- a minimum security weight of 0.05%
- a single security weight cap of 4.5%
- a single GICS sector weight cap of 40%

Optimization Procedure. The weighting process uses an optimization procedure that chooses final weights in such a way to minimize the sum of the squared difference of capped weight and uncapped weight, divided by the uncapped weight for each stock.

S&P 500 Innovation GARP Index

Constituent Selection. At each rebalancing, the index selects constituents according to the following process:

1. For all eligible stocks in the index universe, calculate a Growth and R&D z-score and FCF Quality & Value (QV) composite z-score using the styles and factor components below:

Style	Factor Components
Growth and R&D	(1) Three-year EPS growth (2) Three-year SPS growth (3) R&D to Enterprise Value
FCF Quality & Value (QV) Composite	(1) Free Cash Flow to Revenue ratio (Quality Factor) (2) Free Cash Flow to Debt ratio (Quality Factor) (3) Earnings to Price Ratio (Value Factor)

Calculate the Growth and R&D z-score as the winsorized z-score average of three factors: three-year EPS growth, three-year SPS growth, and R&D to Enterprise Value. A stock must have at least one of the EPS or SPS growth factor to calculate the Growth & R&D score. If the z-score for one factor cannot be properly calculated, use the z-score of the other Growth and R&D factor.

Calculate the FCF QV composite z-score as the winsorized z-score average of three factors: free cash flow to revenue ratio, free cash flow to debt ratio, and earnings to price ratio. A stock must have at least one of the quality factors and the value factor to calculate the FCF QV composite score. If the z-score for one of the quality scores cannot be properly calculated, use the z-score of the other quality factor.

2. Rank eligible stocks by Growth and R&D z-scores and select the 200 highest ranking stocks.
3. Rank the stocks from Step 2 by FCF QV composite z-score and select the 100 highest ranking stocks.

Constituent Weightings. At each rebalancing, the index Growth and R&D Score weights constituents.

S&P/ASX 200 GARP Index

Constituent Selection. At each rebalancing, the index selects constituents according to the following process:

1. For all eligible stocks in the index universe, calculate a Growth z-score and Quality & Value (QV) composite z-score using the styles and factor components below:

Style	Factor Components ³
Growth	(1) Three-year EPS growth (2) Three-year SPS growth
Quality & Value (QV) Composite	(3) Return on Equity (Quality Factor) (4) Earnings to Price Ratio (Value Factor)

Calculate the Growth z-score as the winsorized z-score⁴ average of two factors: three-year EPS growth and three-year SPS growth. If the z-score for one factor cannot be properly calculated, use the z-score of the other factor as the growth z-score.

2. Calculate the QV composite z-score as the winsorized z-score average of two factors: return on equity and earnings to price ratio. A stock must have both quality factor and the value factor to calculate the QV composite score. Rank stocks by Growth z-scores, with only the index-specific counts of Growth stocks defined below remaining eligible for index inclusion.
3. Rank the remaining eligible stocks by QV composite z-score, selecting the highest-ranking index-specific count of QV stocks defined below to form the index, subject to the selection buffer defined below.

Index	Growth Count	QV Count	Automatic Selection by QV Score	Current Constituents Selected by QV Score
S&P/ASX 200 GARP Index	150	50	40	41-60

Buffer Rule. The index applies a 20% selection buffer according to the following process:

1. Rank the top Growth z-score stocks by QV composite z-score, automatically selecting the highest ranking 80% for index inclusion.
2. Select current constituents ranking between the top 80% - 120% by order of QV composite z-score until the target QV count is reached.
3. If at this point there are still not enough constituents to meet the QV count, select the highest-ranking non-constituents in rank order, based on QV composite z-score, until the target count is reached.

Constituent Weightings. At each rebalancing, the index FMC * QV Score weights constituents, subject to the following constraints:

- a minimum security weight cap of 0.1%
- a single security weight cap of 10%
- a single GICS sector weight cap cannot exceed the sector weight in the S&P/ASX 200 plus 10%.

Optimization Procedure. The weighting process uses an optimization procedure that chooses final weights in such a way to minimize the sum of the squared difference of capped weight and uncapped weight, divided by the uncapped weight for each stock.

³ For more information on Fundamental Ratios calculations, please see *Appendix A*.

⁴ For more information on z-score calculations, please see *Appendix B*.

S&P World Ex-Australia GARP Index

Constituent Selection. At each rebalancing, the index selects constituents according to the following process:

1. For all eligible stocks in the index universe, calculate a Growth z-score and Quality & Value (QV) composite z-score using the styles and factor components below:

Style	Factor Components ⁵
Growth	(3) Three-year EPS growth (4) Three-year SPS growth
Quality & Value (QV) Composite	(4) Financial leverage ratio (Quality Factor) (5) Return on Equity (Quality Factor) (6) Earnings to Price Ratio (Value Factor)

Calculate the Growth z-score as the winsorized z-score⁶ average of two factors: three-year EPS growth and three-year SPS growth. If the z-score for one factor cannot be properly calculated, use the z-score of the other factor as the growth z-score.

Calculate the QV composite z-score as the winsorized z-score average of three factors: financial leverage ratio, return on equity, and earnings to price ratio. A stock must have at least one of the quality factors and the value factor to calculate the QV composite score. If the z-score for one of the quality scores can't be properly calculated, use the z-score of the other quality factor.

2. Rank stocks by Growth z-scores, with only the index-specific counts of Growth stocks defined below remaining eligible for index inclusion.
3. Rank the remaining eligible stocks by QV composite z-score, selecting the highest-ranking index-specific count of QV stocks defined below to form the index, subject to the selection buffer defined below.

Index	Growth Count	QV Count	Automatic Selection by QV Score	Current Constituents Selected By QV Score
S&P World Ex-Australia GARP Index	500	250	200	201-300

Buffer Rule. The index applies a 20% selection buffer according to the following process:

1. Rank the top Growth z-score stocks by QV composite z-score, automatically selecting the highest ranking 80% for index inclusion.
2. Select current constituents ranking between the top 80% - 120% by order of QV composite z-score until the target QV count is reached.
3. If at this point there are still not enough constituents to meet the QV count, select the highest-ranking non-constituents in rank order, based on QV composite z-score, until the target count is reached.

Constituent Weightings. At each rebalancing, the index FMC * Growth Score weights constituents, subject to the following constraints:

- a minimum security weight cap of 0.1%
- a single security weight cap of 5%
- a single GICS sector weight cap of 40%

⁵ For more information on Fundamental Ratios calculations, please see *Appendix A*.

⁶ For more information on z-score calculations, please see *Appendix B*.

Optimization Procedure. The weighting process uses an optimization procedure that chooses final weights in such a way to minimize the sum of the squared difference of capped weight and uncapped weight, divided by the uncapped weight for each stock.

Index Maintenance

Index Calculations

For more information on the index calculation methodology, please refer to the Non-Market Capitalization Weighted Indices section of S&P Dow Jones Indices' Index Mathematics Methodology.

Rebalancing

The indices rebalance semi-annually after the close on the third Friday of June and December. The fundamental data reference date is five weeks prior to the rebalancing date. The rebalancing reference date is the last business day of May and November, respectively. Weights calculated as a result of the reference date data are implemented in the index using closing prices as of the Wednesday prior to the second Friday of June and December.

Rebalancing Schedule	
Rebalancing Frequency	Semi-annually
Rebalancing Date	After the close on the third Friday of June and December
Fundamental Data Reference Date	Five weeks prior to the rebalancing date
Reference Date	The last business day of May and November
Weights Reference Date	Closing prices as of the Wednesday prior to the second Friday of June and December

Additions and Deletions

Additions. Except for spin-offs (see *Corporate Actions* below), no additions are made to the index between rebalancings.

Spin-Offs. Spin-offs are added to the index at a zero price prior to the open on the ex-date and removed after at least one day of regular way trading.

For more information Spin-offs, please refer to the Non-Market Capitalization Indices Section of S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

Deletions. Index constituents removed from the index universe are removed from the index simultaneously.

Corporate Actions

For more information on Corporate Actions, please refer to the Non-Market Capitalization Indices Section of S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

Currency of Calculation and Additional Index Return Series

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 the [S&P DJI Methodology & Regulatory Status Database](#).

For information on the calculation of different types of indices, 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.

Other Adjustments

In cases where there is no achievable market price for a stock being deleted, the stock can be removed at a zero or minimal price at the Index Committee's discretion, in recognition of the constraints faced by investors in trading bankrupt or suspended stocks.

Base Date and History Availability

Index history availability, base date, and base value are shown in the table below.

Index	Launch Date	First Value Date	Base Date	Base Value
S&P 500 GARP Index	02/25/2019	06/16/1995	06/16/1995	100
S&P MidCap 400 GARP Index	05/01/2023	12/20/1991	12/20/1991	100
S&P SmallCap 600 GARP Index	05/01/2023	06/16/1995	06/16/1995	100
S&P 500 Innovation GARP Index	06/24/2024	06/19/1998	06/19/1998	100
S&P/ASX 200 GARP Index	08/09/2024	06/18/2004	06/18/2004	100
S&P World Ex-Australia GARP Index	08/09/2024	06/18/2004	06/18/2004	100
S&P 500 GARP 100 Index	11/04/2024	06/19/1998	06/19/1998	100

Index Data

Calculation Return Types

S&P Dow Jones Indices calculates multiple return types, which vary based on the treatment of regular cash dividends. The classification of regular cash dividends is determined by S&P Dow Jones Indices.

- Price Return (PR) versions are calculated without adjustments for regular cash dividends.
- Gross Total Return (TR) versions reinvest regular cash dividends at the close on the ex-date without consideration for withholding taxes.
- Net Total Return (NTR) versions, if available, reinvest regular cash dividends at the close on the ex-date after the deduction of applicable withholding taxes.
- Excess Return (ER) versions will be equal to the gross total return less the associated borrowing costs (as represented by SOFR)

In the event there are no regular cash dividends on the ex-date, the daily performance of all three indices will be identical.

For a complete list of indices available, please refer to the daily index levels file (“.SDL”).

For more information on the classification of regular versus special cash dividends as well as the tax rates used in the calculation of net return, please refer to S&P Dow Jones Indices’ Equity Indices Policies & Practices Methodology.

For more information on the calculation of return types, please refer to S&P Dow Jones Indices’ Index Mathematics Methodology.

Index Governance

Index Committee

An Index Committee maintains the index. All committee members are full-time professional members of S&P Dow Jones Indices' staff. The Index Committee meets regularly. At each meeting, the Index Committee may review pending corporate actions that may affect index constituents, statistics comparing the composition of the indices to the market, companies that are being considered as candidates for addition to an index, and any significant market events. In addition, the Index Committee may revise index policy covering rules for selecting companies, treatment of dividends, share counts 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 the methodology, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

Index Policy

Announcements

All index constituents are evaluated daily for data needed to calculate index levels and returns. All events affecting the daily index calculation are typically announced in advance via the Index Corporate Events report (.SDE), delivered daily to all clients. Any unusual treatment of a corporate action or short notice of an event may be communicated via email to clients.

For more information, please refer to the Announcements section of S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

Pro-forma Files

In addition to the corporate events file (.SDE), S&P Dow Jones Indices provides constituent pro-forma files each time the indices rebalance. The pro-forma file is typically provided daily in advance of the rebalancing date and contains all constituents and their corresponding weights and index shares effective for the upcoming rebalancing. Since index shares are assigned based on prices prior to the rebalancing, the actual weight of each stock at the rebalancing will differ from these weights due to market movements.

Please visit www.spglobal.com/spdji for a complete schedule of rebalancing timelines and pro-forma delivery times.

Holiday Schedule

The index is calculated on all days when at least one of the underlying exchanges is open.

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' Equity Indices Policies & Practices Methodology.

Recalculation Policy

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

For information on Calculations and Pricing Disruptions, Expert Judgment, and Data Hierarchy, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices 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 the [S&P DJI Methodology & Regulatory Status Database](#) for a complete list of indices covered by this document.

Index	Return Type	BBG	RIC
S&P 500 GARP Index (USD)	Price Return	SPXGARPP	.SPXGARPP
	Total Return	SPXGARPT	.SPXGARPT
	Net Total Return	SPXGARPN	.SPXGARPN
S&P MidCap 400 GARP Index (USD)	Price Return	SP4GRPUP	.SP4GRPUP
	Total Return	SP4GRPUT	.SP4GRPUT
	Net Total Return	SP4GRPUN	.SP4GRPUN
S&P SmallCap 600 GARP Index (USD)	Price Return	SP6GRPUP	.SP6GRPUP
	Total Return	SP6GRPUT	.SP6GRPUT
	Net Total Return	SP6GRPUN	.SP6GRPUN
S&P 500 GARP 100 Index (USD)	Price Return	SPXGPOUP	.SPXGPOUP
	Total Return	SPXGPOUT	.SPXGPOUT
	Net Total Return	SPXGPOUN	.SPXGPOUN
S&P 500 Innovation GARP Index (USD)	Price Return	SPGROWP	SPGROWP
	Total Return	SPGROWT	SPGROWT
	Net Total Return	SPGROWN	SPGROWN
S&P 500 Innovation GARP Index (SOFR) (USD)	Excess Return	SPGROWER	.SPGROWER
S&P/ASX 200 GARP Index (AUD)	Price Return	SPAUGPAP	.SPAUGPAP
	Total Return	SPAUGPAT	.SPAUGPAT
	Net Total Return	SPAUGPAN	.SPAUGPAN
S&P World Ex-Australia GARP Index (AUD)	Price Return	SPWHGPAP	.SPWHGPAP
	Total Return	SPWHGPAT	.SPWHGPAT
	Net Total Return	SPWHGPAN	.SPWHGPAN

Index Data

Daily constituent and index level data are available via subscription.

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

Website

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

Appendix A

Fundamental Ratios Calculation

As of the rebalancing reference date, fundamental ratios are calculated for each security in the index universe. They are defined as follows.

- **Three-Year EPS Growth:** calculate as a company's three-year EPS compound annual growth rate (CAGR).

$$\text{CAGR} = \left(1 + \frac{\text{EPS FY current} - \text{EPS FY three year ago}}{\text{Absolute (EPS FY three year ago)}}\right)^{\frac{1}{3}} - 1$$

- **Three-Year SPS Growth:** calculate as a company's three-year SPS compound annual growth rate (CAGR).
- **Financial Leverage Ratio (FLR):** calculate as a company's latest total debt divided by its book value.

$$\text{Leverage} = \frac{\text{Total Debt}}{\text{BVPS} \times \text{Common Shares Outstanding}}$$

- **Return on Equity (ROE):** calculate as a company's trailing 12-month month basic earnings per share (EPS) excluding discontinued operations & extraordinary item divided by latest book value per share (BVPS).

$$\text{ROE} = \frac{\text{EPS}}{\text{BVPS}}$$

- **Earnings-to-Price Ratio:** calculate as a company's trailing 12-month diluted earnings per share excluding discontinued operations & extraordinary items divided by price.

$$\text{Earnings to Price} = \frac{\text{EPS}}{\text{P}}$$

- **R&D to Enterprise Value:** calculate as a company's latest research and development expenditure divided by its enterprise value including cash.

$$\text{R\&D to Enterprise Value Including Cash} = \frac{\text{R\&D Expenditure}}{\text{Enterprise Value Including Cash}}$$

- **Free Cash Flow to Revenue ratio:** calculate as a company's trailing 12-month free cash flow divided by its trailing 12-month revenue.

$$\text{Free Cash Flow to Revenue} = \frac{\text{FCF}}{\text{Revenue}}$$

- **Free Cash Flow to Debt ratio:** calculate as a company's trailing 12-month free cash flow divided by its latest total debt.

$$\text{Free Cash Flow to Debt} = \frac{\text{FCF}}{\text{Total Debt}}$$

Outlier Handling and Winsorization. Outlier fundamental ratios are winsorized to ensure that the average values used to calculate the overall component score are less distorted by extreme values. For a given fundamental variable, the values for all securities are first ranked in ascending order. Then, for securities that lie above the 97.5 percentile rank or below the 2.5 percentile rank, their value is set as

equal to the value of the 97.5 percentile ranked or the 2.5 percentile ranked security, whichever is applicable.

- **Return on Equity.** If the underlying earnings per share (“EPS”) or book value per share (“BVPS”) for a given stock’s ROE is negative, its ROE value will be excluded, and the stock will be assigned an ROE Z-score set as equal to the ROE Z-score value of the 2.5 percentile ranked security.
- **Financial Leverage Ratio.** If the underlying data point for a given stock’s BVPS is negative, leading to a negative Leverage, its Leverage value will be excluded, and the stock will be assigned a Leverage Z-score set as equal to the Leverage Z-score value of the 2.5 percentile ranked security.
- **R&D expenditure.** If the underlying data point for a given stock’s R&D expenditure is not available, its value is replaced with 0.

Appendix B

Z-score and Growth (or Growth and R&D) Score Computation

Z-score Computation. Computing a z-score is a widely adopted method of standardizing a variable in order to combine it with other variables that may have a different scale or unit of measurement. After winsorizing all the fundamental ratios, the z-score for each of the relevant ratios for each security is calculated using the mean and standard deviation of the relevant variable within each of the index universes.

In general, the z-score is calculated as follows:

$$z\alpha = (x\alpha - \mu\alpha) / \sigma\alpha$$

Financial Leverage Ratios. The z-score is calculated as follows:

$$z\alpha = -(x\alpha - \mu\alpha) / \sigma\alpha$$

where:

$z\alpha$ = Z-score for a given security

$x\alpha$ = Winsorized variable for a given security

$\mu\alpha$ = Arithmetic mean of the winsorized variable in a given index universe, excluding any missing values

$\sigma\alpha$ = Standard deviation of the winsorized variable in a given index universe

Average Z-score Computation. For each security, the average z-score is computed by taking a simple average of the relevant scores. Where there is a missing value, the average z-score is computed by taking a simple average of the remaining scores.

Outlier Handling and Winsorization. Outlier average z-scores are winsorized to ensure that the overall growth scores are less distorted by extreme values. To do this, for a given average z-score, the values for all securities are first ranked in ascending order. Then, for securities that lie above 4 or below -4, their value is set as equal to 4 or -4, whichever is applicable.

Growth (or Growth and R&D) /QV (or FCF Quality & Value (QV) Composite) Score Computation.

Using the winsorized z-score, calculate a score for each of the securities. For a given security, if its winsorized z-score is above 0, then its score is the addition of 1 and the winsorized z-score. If its winsorized z-score is below 0, then its score is the result of the reciprocal of 1 subtracted by its winsorized z-score.

If average $Z > 0$, Score = $1 + Z$

If average $Z < 0$, Score = $(1 / (1 - Z))$

If average $Z = 0$, Score = 1

Appendix C

Methodology Changes

Methodology changes since February 25, 2019, are as follows:

Change	Effective Date (After Close)	Methodology	
		Previous	Updated
Constituent Selection	12/16/2022	<p>The Growth z-score is calculated as the winsorized z-score average of two factors: three-year EPS growth and three-year SPS growth. If the z-score for one factor cannot be properly calculated, the z-score of the other factor will be used as the growth z-score.</p> <p>The QV composite z-score is calculated as the winsorized z-score average of three factors: financial leverage ratio, return on equity, and earnings to price ratio. A stock needs to have at least one of the quality factors and the value factor to calculate the QV composite score. If the z-score for one of the quality scores can't be properly calculated, the z-score of the other quality factor will be used.</p>	<p>Calculate the Growth z-score as the winsorized z-score average of two factors: three-year EPS growth and three-year SPS growth. If the z-score for one factor cannot be properly calculated, use the z-score of the other factor as the growth z-score. If the underlying EPS current fiscal year data point for a given stock's three-year EPS Growth is negative, the stock is ineligible for index inclusion.</p> <p>Calculate the QV composite z-score as the winsorized z-score average of three factors: financial leverage ratio, return on equity, and earnings to price ratio. A stock must have at least one of the quality factors and the value factor to calculate the QV composite score. If the z-score for one of the quality scores can't be properly calculated, use the z-score of the other quality factor.</p> <p>If the underlying EPS or book value per share ("BVPS") for a given stock's return on equity ("ROE") is negative, the stock is ineligible for index inclusion.</p>
Outlier Handling and Winsorization: Return on Equity ("ROE")	12/16/2022	<p>If the underlying data points for a given stock's ROE are both negative, leading to a positive ROE, its ROE value will be excluded, and the stock will be assigned an ROE Z-score set as equal to the ROE Z-score value of the 2.5 percentile ranked security.</p>	<p>If the underlying earnings per share ("EPS") or book value per share ("BVPS") for a given stock's ROE is negative, its ROE value will be excluded, and the stock will be assigned an ROE Z-score set as equal to the ROE Z-score value of the 2.5 percentile ranked security.</p>

Appendix D

ESG Disclosures

EXPLANATION OF HOW ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) FACTORS ARE REFLECTED IN THE KEY ELEMENTS OF THE BENCHMARK METHODOLOGY⁷	
1.	Name of the benchmark administrator. S&P Dow Jones Indices LLC.
2.	Underlying asset class of the ESG benchmark.⁸ N/A
3.	Name of the S&P Dow Jones Indices benchmark or family of benchmarks. S&P DJI Equity Indices Benchmark Statement
4.	Do any of the indices maintained by this methodology take into account ESG factors? No
Appendix latest update: January 2021	
Appendix first publication: January 2021	

⁷ The information contained in this Appendix is intended to meet the requirements of the European Union Commission Delegated Regulation (EU) 2020/1817 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the minimum content of the explanation of how environmental, social and governance factors are reflected in the benchmark methodology and the retained EU law in the UK [The Benchmarks (amendment and Transitional Provision) (EU Exit) Regulations 2019].

⁸ The 'underlying assets' are defined in European Union Commission Delegated Regulation (EU) 2020/1816 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published.

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 by 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. Also, the treatment of corporate actions in back-tested performance may differ from treatment for live indices due to limitations in replicating index management decisions. 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

© 2025 S&P Dow Jones Indices. All rights reserved. S&P, S&P 500, SPX, SPY, The 500, US500, US 30, S&P 100, S&P COMPOSITE 1500, S&P 400, S&P MIDCAP 400, S&P 600, S&P SMALLCAP 600, S&P GIVI, GLOBAL TITANS, DIVIDEND ARISTOCRATS, Select Sector, S&P MAESTRO, S&P PRISM, S&P STRIDE, GICS, SPIVA, SPDR, INDEXOLOGY, iTraxx, iBoxx, ABX, ADBI, CDX, CMBX, MBX, MCDX, PRIMEX, HHPI, and SOVX are registered trademarks of S&P Global, Inc. ("S&P Global") or its affiliates. DOW JONES, DJIA, THE DOW and DOW JONES INDUSTRIAL AVERAGE are trademarks of Dow Jones Trademark Holdings LLC ("Dow Jones"). These trademarks together with others have been licensed to S&P Dow Jones Indices LLC. Redistribution or reproduction in whole or in part are prohibited without written permission of S&P Dow Jones Indices LLC. This document does not constitute an offer of services in jurisdictions where S&P DJI does not have the necessary licenses. Except for certain custom index calculation services, all information provided by S&P DJI is impersonal and not tailored to the needs of any person, entity, or group of persons. S&P DJI receives compensation in connection with licensing its indices to third parties and providing custom calculation services. Past performance of an index is not an indication or guarantee of future results.

It is not possible to invest directly in an index. Exposure to an asset class represented by an index may be available through investable instruments based on that index. S&P DJI does not sponsor, endorse, sell, promote or manage any investment fund or other investment vehicle that is offered by third parties and that seeks to provide an investment return based on the performance of any index. S&P DJI makes no assurance that investment products based on the index will accurately track index performance or provide positive investment returns. S&P DJI is not an investment advisor, commodity trading advisor, fiduciary, "promoter" (as defined in the Investment Company Act of 1940, as amended) or "expert" as enumerated within 15 U.S.C. § 77k(a), and S&P DJI makes no representation regarding the advisability of investing in any such investment fund or other investment vehicle. A decision to invest in any such investment fund or other investment vehicle should not be made in reliance on any of the statements set forth in this document. S&P DJI is not a tax advisor. Inclusion of a security, commodity, crypto currency, or other asset within an index is not a recommendation by S&P DJI to buy, sell, or hold such security, commodity, crypto currency, or other asset, nor is it considered to be investment or trading advice.

These materials have been prepared solely for informational purposes based upon information generally available to the public and from sources believed to be reliable. No content contained in these materials (including index data, ratings, credit-related analyses and data, research, valuations, model, software or other application or output therefrom) or any part thereof ("Content") may be modified, reverse engineered, reproduced, or distributed in any form or by any means, or stored in a database or retrieval system, without the prior written permission of S&P DJI. The Content shall not be used for any unlawful or unauthorized purposes. S&P DJI and its third-party data providers and licensors (collectively "S&P Dow Jones Indices Parties") do not guarantee the accuracy, completeness, timeliness, or availability of the Content. S&P Dow Jones Indices Parties are not responsible for any errors or omissions, regardless of the cause, for the results obtained from the use of the Content. THE CONTENT IS PROVIDED ON AN "AS IS" "WHERE IS" BASIS. S&P DOW JONES INDICES PARTIES DISCLAIMS ANY AND ALL

EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE OR HARDWARE CONFIGURATION. In no event shall S&P Dow Jones Indices Parties be liable to any party for any direct, indirect, incidental, exemplary, compensatory, punitive, special, or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related information and other analyses, including ratings, research and valuations are generally provided by licensors and/or affiliates of S&P Dow Jones Indices, including but not limited to S&P Global's other divisions such as S&P Global Market Intelligence. Any credit-related information and other related analyses and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. Any opinion, analyses and rating acknowledgement decisions are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P Dow Jones Indices does not assume any obligation to update the Content following publication in any form or format. The Content should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. S&P DJI does not act as a fiduciary or an investment advisor. While S&P DJI has obtained information from sources it believes to be reliable, S&P DJI does not perform an audit or undertake independent verification of any information it receives. S&P DJI reserves the right to vary or discontinue any index at any time for regulatory or other reasons. Various factors, including external factors beyond S&P DJI's control might necessitate material changes to indices.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P Global Ratings reserves the right to assign, withdraw or suspend such acknowledgement at any time and in its sole discretion. S&P Dow Jones Indices, including S&P Global Ratings, disclaim any duty whatsoever arising out of the assignment, withdrawal, or suspension of an acknowledgement as well as any liability for any damage alleged to have been suffered on account thereof. Affiliates of S&P Dow Jones Indices LLC, including S&P Global Ratings, may receive compensation for its ratings and certain credit-related analyses, normally from issuers or underwriters of securities or from obligors. Such affiliates of S&P Dow Jones Indices LLC, including S&P Global Ratings, reserve the right to disseminate its opinions and analyses. Public ratings and analyses from S&P Global Ratings are made available on its Web sites, www.standardandpoors.com (free of charge), and www.ratingsdirect.com and www.globalcreditportal.com (subscription), and may be distributed through other means, including via S&P Global Ratings publications and third-party redistributors. Additional information about our ratings fees is available at www.standardandpoors.com/usratingsfees.

S&P Global keeps certain activities of its various divisions and business units separate from each other to preserve the independence and objectivity of their respective activities. As a result, certain divisions and business units of S&P Global may have information that is not available to other business units. S&P Global has established policies and procedures to maintain the confidentiality of certain nonpublic information received in connection with each analytical process.

In addition, S&P Dow Jones Indices provides a wide range of services to, or relating to, many organizations, including issuers of securities, investment advisers, broker-dealers, investment banks, other financial institutions, and financial intermediaries, and accordingly may receive fees or other economic benefits from those organizations, including organizations whose securities or services they may recommend, rate, include in model portfolios, evaluate, or otherwise address.

Some indices use the Global Industry Classification Standard (GICS®), which was developed by, and is the exclusive property and a trademark of, S&P Global and MSCI. Neither MSCI, S&P DJI nor any other party involved in making or compiling any GICS classifications makes any express or implied warranties or representations with respect to such standard or classification (or the results to be obtained by the use

thereof), and all such parties hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability, or fitness for a particular purpose with respect to any of such standard or classification. Without limiting any of the foregoing, in no event shall MSCI, S&P DJI, any of their affiliates or any third party involved in making or compiling any GICS classifications have any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

S&P Dow Jones Indices products are governed by the terms and conditions of the agreements under which they may be provided. A license is required from S&P Dow Jones Indices to display, create derivative works of and/or distribute any product or service that uses, is based upon and/or refers to any S&P Dow Jones Indices and/or index data.

ESG Indices Disclaimer

S&P DJI provides indices that seek to select, exclude, and/or weight index constituents based on, but not limited to, certain environmental, social or governance (ESG) indicators, or a combination of those indicators, including the following: environmental indicators (including the efficient use of natural resources, the production of waste, greenhouse gas emissions, or impact on biodiversity); social indicators (such as, inequality and investment in human capital); governance indicators (such as sound management structures, employee relations, remuneration of staff, tax compliance, respect for human rights, anti-corruption and anti-bribery matters), specific sustainability or values-related company involvement indicators (for example, production/distribution of controversial weapons, tobacco products, or thermal coal), or controversies monitoring (including research of media outlets to identify companies involved in ESG-related incidents).

S&P DJI ESG indices use ESG metrics and scores in the selection and/or weighting of index constituents. ESG scores or ratings seek to measure or evaluate a company's, or an asset's, performance with respect to environmental, social and corporate governance issues.

The ESG scores, ratings, and other data used in S&P DJI ESG indices is supplied directly or indirectly by third parties (note these parties can be independent affiliates of S&P Global or unaffiliated entities) so an S&P DJI ESG index's ability to reflect ESG factors depends on these third parties' data accuracy and availability.

ESG scores, ratings, and other data may be reported (meaning that the data is provided as disclosed by companies, or an asset, or as made publicly available), modelled (meaning that the data is derived using a proprietary modelling process with only proxies used in the creation of the data), or reported and modelled (meaning that the data is either a mix of reported and modelled data or is derived from the vendor using reported data /information in a proprietary scoring or determination process).

ESG scores, ratings, and other data, whether from an external and/or internal source, is based on a qualitative and judgmental assessment, especially in the absence of well-defined market standards, and due to the existence of multiple approaches and methodologies to assess ESG factors and considerations. An element of subjectivity and discretion is therefore inherent in any ESG score, rating, or other data and different ESG scoring, rating, and/or data sources may use different ESG assessment or estimation methodologies. Different persons (including ESG data ratings, or scoring providers, index administrators or users) may arrive at different conclusions regarding the sustainability or impact of a particular company, asset, or index.

Where an index uses ESG scores, ratings or other data supplied directly or indirectly by third parties, S&P DJI does not accept responsibility for the accuracy or completeness of such ESG scores, ratings, or data.

No single clear, definitive test or framework (legal, regulatory, or otherwise) exists to determine 'ESG', 'sustainable', 'good governance', 'no adverse environmental, social and/or other impacts', or other equivalently labelled objectives. In the absence of well-defined market standards and due to the existence of multitude approaches, the exercise of judgment is necessary. Accordingly, different persons may classify the same investment, product and/or strategy differently regarding 'ESG', 'sustainable', 'good

governance', 'no adverse environmental, social and/or other impacts', or other equivalently labelled objectives. Furthermore, the legal and/or market position on what constitutes an 'ESG', 'sustainable', 'good governance', 'no adverse environmental, social and/or other impacts', or other equivalently labelled objectives may change over time, especially as further regulatory or industry rules and guidance are issued and the ESG sustainable finance framework becomes more sophisticated.

Prospective users of an S&P DJI ESG Index are encouraged to read the relevant index methodology and related disclosures carefully to determine whether the index is suitable for their potential use case or investment objective.