

S&P/JPX Equity Indices *Methodology*

November 2025

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Introduction

Index Objective and Highlights

S&P/TOPIX 150. The index measures the performance of the largest and most liquid stocks traded on the Tokyo Stock Exchange. The 150 index constituents are all leading companies in the Japanese equity market selected on the basis of size, liquidity, and sector representation as classified by the Global Industry Classification Standard (GICS®). The index attempts to maintain GICS sector balance, as measured by a comparison of each sector's weight in the index with its weight in the universe in order to ensure representative sector weightings.

The S&P/TOPIX 150 is one of seven headline indices that make up the S&P Global 1200. S&P Dow Jones Indices' Global 1200 indices are real-time float-adjusted market capitalization (FMC) weighted indices that include the largest and the most liquid stocks from around the world. These indices cover seven distinct regions and 29 countries, capturing approximately 70% of the world market capitalization.

S&P/JPX Prime Market 250 Index. The index measures the performance of the largest and most liquid stocks traded on the Prime Market segment of the Tokyo Stock Exchange. The Prime Market, introduced by the Tokyo Stock Exchange in April 2022, includes companies with appropriate FMC and liquidity levels that satisfy minimum governance and business performance metrics.

The 250 index constituents are leading companies in the Japanese equity market, selected on the basis of size, liquidity, and sector representation, as classified by GICS.

Index Family

The S&P/TOPIX 150 is a part of the S&P Japan 500 Index Series.¹ This series also includes the following:

- S&P Japan MidCap 100
- S&P Japan SmallCap 250

The S&P/TOPIX 150 is also a part of the S&P Global 1200 Index Series.² This series also includes the following:

- S&P 500
- S&P ASX All Australian 50
- S&P Europe 350
- S&P Latin America 40
- S&P/TSX 60
- S&P Asia 50

Representation

The S&P/TOPIX 150 aims to mirror the sector weights of the broader universe of stocks from the Japanese market. This policy ensures that, with 150 stocks, investors are approximating the sectors within the country.

The S&P/JPX Prime Market 250 aims to mirror the sector weights of the broader universe of stocks from the parent Tokyo Stock Exchange Prime Market Index with an active range of $\pm 3\%$. This policy ensures that, with 250 stocks, investors are approximating the sectors within the country.

¹ For more information on the S&P Japan 500 Index Series, please refer to the S&P Japanese Indices Methodology available at www.spglobal.com/spdji/.

² For more information on the S&P Global 1200 Index Series, please refer to the S&P Global 1200 Methodology available at www.spglobal.com/spdji/.

Partnership

S&P Dow Jones Indices and the Tokyo Stock Exchange³ together created the S&P/TOPIX 150 and S&P/JPX Prime Market 250, which are real-time, FMC weighted indices.

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' 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' Float Adjustment Methodology	Float Adjustment 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.

TOPIX is a trademark of JPX Market Innovation & Research, Inc. and has been licensed for use by S&P Dow Jones Indices.

JPX is a trademark of Japan Exchange Group, Inc. and has been licensed for use by the S&P Dow Jones Indices.

³ On 04/01/2022, JPX Market Innovation & Research, Inc. took over provision of the index-related services provided by Tokyo Stock Exchange.

Eligibility Criteria

Index Universe

S&P/TOPIX 150. At each rebalancing, the index universe is all constituents of the S&P Japan BMI (the underlying index).

For information on the S&P Japan BMI, please refer to the S&P Global BMI Methodology located at www.spglobal.com/spdji/.

S&P/JPX Prime Market 250 Index. At each rebalancing, the index universe is all constituents of the Tokyo Stock Exchange Prime Market Index (the underlying index).

For information on the Tokyo Stock Exchange Prime Market Index, please refer [here](#).

Eligibility Factors

S&P/TOPIX 150. As of each rebalancing reference date, stocks in the index universe must satisfy the following criteria to be eligible for index inclusion:

- **Eligible Securities:** must be common and preferred shares (which are of an equity and not of a fixed income nature). Convertible stock, bonds, warrants, rights, and preferred stock that provide a guaranteed fixed return are not eligible.
- **Domicile:** company must be established in Japan and trading on the Tokyo Stock Exchange.
- **Initial Public Offerings (IPOs):** IPOs must have at least six months of trading history.
- **Investable Weight Factor (IWF):** New constituents must have a public float of at least 50% (current constituents have no minimum float).
- **Liquidity:** Index constituents are assessed for liquidity ratio, measured by the ratio of 12-month value traded to average FMC as of the rebalancing reference date. New constituents must have a liquidity ratio of 50% and current constituents have no liquidity ratio requirement.
- **Sector Classification:** Stocks are classified according to GICS. S&P Dow Jones Indices aims to maintain GICS sector weights in the index within a $\pm 3\%$ range from their respective weights in the S&P Japan BMI.
- **REITs:** not be classified as a Real Estate Investment Trust (REITs).

S&P/JPX Prime Market 250 Index. As of each rebalancing reference date, stocks in the index universe must satisfy the following to be eligible for index inclusion:

- **Profitability Screen:** must have at least one positive quarterly earnings per share (EPS) in the past four quarters.⁴
- **REITs:** not be classified as a Real Estate Investment Trust (REITs).⁵

⁴ For history prior to April 2022, stocks must have had a positive EPS for the most recent four quarters for index inclusion.

⁵ For history prior to April 2022, index constituents were drawn from the S&P Japan BMI with the following screens: 1) listed on first section; 2) with Investable Weight Factor no less than 35%; and 3) must have a three-month average daily volume traded of at least 20 million Japanese Yen.

Index Construction

Constituent Selection

S&P/TOPIX 150 Index. At each rebalancing, the index selects 150 of the most liquid leading companies from the underlying index, subject to a two-way buffer, using the following process:

1. Rank eligible stocks in descending order by three-month average FMC.
2. Select stocks ranking higher or equal to the direct entry buffer threshold of 80.
3. Select stocks ranking lower than the direct removal buffer threshold of 220.
4. Select current constituents not included in the above steps but ranking higher or equal to the direct removal buffer threshold of 220 in order of the highest rank until the fixed count of 150 is achieved.
5. In cases where the fixed count is not achieved after the above steps, select non-index constituents in order of the highest rank to achieve the fixed count.

Sector Indices

S&P Dow Jones Indices assigns the index constituents of the S&P/TOPIX 150 to a Sector Index based on the constituent's classification under GICS, as follows:

Sector Index	GICS Classifications (GICS Code)
Communication Services	GICS Communication Services Sector (50)
Consumer Discretionary	GICS Consumer Discretionary Sector (25)
Consumer Staples	GICS Consumer Staples Sector (30)
Energy	GICS Energy Sector (10)
Financials	GICS Financials Sector (40)
Health Care	GICS Health Care Sector (35)
Industrials	GICS Industrials Sector (20)
Information Technology	GICS Information Technology Sector (45)
Materials	GICS Materials Sector (15)
Utilities	GICS Utilities Sector (55)
Real Estate	GICS Real Estate Sector (60)

For more information on the structure of GICS, please refer to the GICS methodology.

S&P/JPX Prime Market 250 Index. At each rebalancing, the index selects 250 of the largest leading companies from the underlying index, subject to a selection buffer, using the following process:

1. Rank eligible stocks in descending order by FMC. Select stocks in the following order until the target count is reached:
 - a. Automatically select stocks ranking in the top 200.
 - b. Select current constituents ranking between 201 and 300.
 - c. If at this point the target count is not reached, select eligible stocks in rank order until the target count is met.
2. Compare the GICS Sector breakdowns (by FMC) of the selected stocks from the previous step to that of the underlying index. If all sector weight deviations are within an active range of 3%, the selected stocks from step 1 form the index.

3. If a sector is more than 3% overweight, repeat the following stock switch process until all sector overweights are within 3%.
 - a. Drop the smallest selected company by FMC from the overweighted sector.
 - b. Add the next largest company from other sectors.
4. If, after Step 3, a sector has more than a 3% underweight, repeat the following stock switch process until all sector underweights are within 3%.
 - a. Drop the smallest selected company from other sectors.
 - b. Add the next largest company by FMC from the underweighted sector.

Index Calculations

The indices calculate by means of the divisor methodology used in all S&P Dow Jones Indices' equity indices.

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

Index Maintenance

Rebalancing

The indices rebalance quarterly after the market close on the third Friday of March, June, September, and December. The rebalancing reference date is after the market close of the second to last Friday of February, May, August, and November.

Additions and Deletions

Additions.

- **S&P/TOPIX 150.** Except for spin-offs, additions are generally only made if a vacancy is created by an index deletion. Index additions are made according to market size and liquidity, with a view to preserving sector representation in the index. Except for replacements made during rebalancing months, the reference date for replacements is as of after the close of the last business day of the previous month. For replacements made between the rebalancing reference date but before the rebalancing month end, reference data for replacements is as of the rebalancing reference date.
- **S&P/JPX Prime Market 250.** Except for spin-offs, no additions are made between rebalancings.

Spin-offs. A spin-off is added to all the indices of which the parent company is a constituent at a zero price at the market close of the day before the ex-date (with no divisor adjustment). Ineligible spin-offs are removed after at least one day of regular trading (with a divisor adjustment).

For more information on spin-off treatments, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

Deletions. Deletions can occur due to acquisitions, mergers and spin-offs or due to bankruptcies or suspensions. Constituents may also be removed if they no longer represent the market. Changes are made at the discretion of the Index Committee.

S&P/JPX Prime Market 250 Index. Constituents removed from the underlying index between rebalancings are removed from the index at the subsequent rebalancing.

The removal of bankrupt companies from the S&P Japanese Indices differs from that of other S&P Dow Jones Indices, in that stocks are removed from the relevant index with a five-day notification period and are removed from the index at the last traded price.

Corporate Actions

For more information on corporate actions, please refer to the Market Capitalization Indices section of S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

Please refer to S&P Dow Jones Indices' Index Mathematics Methodology for a summary of index maintenance adjustments.

Currency of Calculation and Additional Index Return Series

Real-time spot Forex rates, as supplied by WMR, are used for ongoing index calculation. The end-of-day value of the index is calculated using the real-time spot exchange rate provided by WMR at the time the index is closed.

WMR foreign exchange rates are taken daily at 4:00 PM London Time and used in the calculation of the indices. These mid-market fixings are calculated by WMR based on LSEG data and appear on LSEG pages.

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 Methodology & Regulatory Status Database](#).

For information on index calculations, 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-controlled indices, please refer to the Parameters documents available at www.spglobal.com/spdji/.

Base Date and History Availability

The 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/TOPIX 150	12/31/1997	12/31/1987	12/31/1997	1000
S&P/JPX Prime Market 250 Index	12/09/2024	09/21/2012	09/21/2012	1000

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.

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

The S&P/JPX Index Committee maintains the indices. The Index Committee meets regularly. All committee members are full-time professional members of S&P Dow Jones Indices' and the JPX Market Innovation & Research, Inc. At each meeting, the Index Committee reviews pending corporate actions that may affect index constituents, statistics comparing the composition of the index to the market, companies that are being considered as candidates for addition to the 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 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 on S&P Dow Jones Indices' announcements, please refer to the [Announcement Policy](#).

Pro-forma Files

In addition to the corporate events file (.SDE), S&P Dow Jones Indices provides constituent pro-forma files each time the index rebalances. 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.

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 that the Tokyo Stock Exchange is officially open and trading.

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.

Real-Time Calculation

The index is calculated in real-time. Real-time indices are not restated.

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 [S&P DJI Methodology & Regulatory Status Database](#) for a complete list of indices covered by this document.

Index	BBG	RIC
S&P/TOPIX 150 (Price Return)	SPTPX	.SPTPX
S&P/JPX Japan Prime Market 250	SPJPRMUP	.SPJPRMUP

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.

Web site

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

Appendix A

Methodology Changes

Methodology changes since January 1, 2015, are as follows:

Change	Effective Date (After Close)	Methodology	
		Previous	Updated
S&P TOPIX 150: Constituent Selection	12/17/2021	At each review, stocks in the eligible universe are ranked by their three-month average float-adjusted market capitalizations. If a current constituent ranks lower than 220, it is removed from the index and the largest non-constituent that is ranked among the top 150 is added as a replacement, provided all other eligibility criteria are met.	At each review, stocks in the eligible universe are ranked in descending order by their three-month average float-adjusted market capitalizations. The selection process uses the two-way buffer selection steps described below. <u>Two-Way Buffer Selection Steps:</u> <ol style="list-style-type: none"> 1. Stocks ranking higher or equal to the direct entry buffer threshold of 80 are included. 2. Stocks ranking lower than the direct removal buffer threshold of 220 are excluded. 3. Current constituents not included in the above steps but ranking higher or equal to the direct removal buffer threshold of 220 are included in order of the highest rank until the fixed count of 150 is achieved. 4. In cases where the fixed count is not achieved after the above steps, non-index constituents are selected in order of the highest rank to achieve the fixed count.
S&P TOPIX 150: Rebalancing Reference Date	12/17/2021	Except for the September rebalancing, the rebalancing reference date is after the market close of the last business day of the previous month. The rebalancing reference date for the September rebalancing is after the market close of the second to last Friday of August.	The rebalancing reference date is after the market close of the second to last Friday of February, May, August, and November
S&P TOPIX 150: Constituent Selection	06/18/2021	At each review, stocks in the index universe are ranked by their three-month average float-adjusted market capitalizations.	At each review, stocks in the eligible universe are ranked by their three-month average float-adjusted market capitalizations.
S&P TOPIX 150: Rebalancing Reference date	08/23/2019	The rebalancing reference date is after the market close of the last business day of the previous month.	Except for the September rebalancing, the rebalancing reference date is after the market close of the last business day of the previous month. The rebalancing reference date for the September rebalancing is after the market close of the second to last Friday of August.
S&P/TOPIX 150 Communication Services Sector Index: Eligibility	09/21/2018	The index is comprised of the constituents of the S&P Japan 500 classified as part of the Telecommunication Services (GICS Code: 50).	The index is comprised of the constituents of the S&P Japan 500 classified as part of the Communication Services (GICS Code: 50).
S&P TOPIX 150:	06/16/2017	Float-adjusted market capitalization, as of the market close on the reference day, is used in the index composition screening.	Three-month average float-adjusted market capitalization is used in the index composition screening.

Change	Effective Date (After Close)	Previous	Methodology Updated
Market Capitalization Screening			
S&P TOPIX 150: Index Selection Buffers	06/16/2017	--	At each review, stocks are ranked by their three-month average float-adjusted market capitalizations. Current constituents ranked lower than 220 are removed from the index, and the largest non-constituent stocks that ranked among the top 150 are added to the index as replacements, provided they meet all other eligibility criteria.
S&P TOPIX 150: Float Rate for New Additions	06/16/2017	--	For new index additions, a float rate of at least 50% is required.
S&P TOPIX 150: GICS Sector Balance Criteria	06/16/2017	--	The index methodology aims to maintain GICS sector weights in the index within a $\pm 3\%$ range from their respective weights in the S&P Japan BMI.

Appendix B

ESG Disclosures

EXPLANATION OF HOW ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) FACTORS ARE REFLECTED IN THE KEY ELEMENTS OF THE BENCHMARK METHODOLOGY⁶	
1.	Name of the benchmark administrator. S&P Dow Jones Indices LLC.
2.	Underlying asset class of the ESG benchmark.⁷ 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	

⁶ 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].

⁷ 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).

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