

MarketGrader’s Alignment with IOSCO Principles for Financial Benchmarks

MarketGrader develops, publishes and administers global equity indexes, whose constituents it selects based on its ratings of publicly traded companies listed on global exchanges. These Indexes are designed as benchmarks to underlie financial products and MarketGrader is committed to ensuring that its methodologies are codified, fully transparent and available to all stakeholders. MarketGrader hereby affirms its alignment with the IOSCO Principles for Financial Benchmarks¹ (the IOSCO Principles) in the maintenance, publication and administration of such Indexes. MarketGrader has therefore adopted and implemented an extensive oversight framework to ensure the transparency, quality and integrity of its ratings and Indexes. This framework forms the basis of the Code of Conduct by which all MarketGrader employees perform their duties and is defined in a series of internal company policies, which are available on MarketGrader’s website and may be accessed here:

[Statement on the Integrity of MarketGrader Ratings and Indexes](#)

[MarketGrader Policy for Handling Index Complaints](#)

[Code of Conduct Governing Conflicts of Interest in the Administration of the MarketGrader Indexes](#)

Additionally, MarketGrader publishes on its website the methodologies that govern all of its Indexes underlying financial products and has agreements with third parties for the calculation of such Indexes. These providers include ICE Data Indices, China Securities Index Co., Solactive AG and Refinitiv, all of which are aligned with the IOSCO Principles. MarketGrader is confident in the quality and integrity of the processes employed by these firms in calculating its Indexes and maintaining them to the highest standards of financial benchmarks.

¹ <https://www.iosco.org/library/pubdocs/pdf/IOSCOPD415.pdf>