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# Akros Index Engineering Conflicts of Interest Policy

Akros Index Engineering Inc.

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## 1. Introduction

- 1.1. Akros Index Engineering Inc. is a wholly owned U.S. subsidiary of Akros Technologies Inc.
- 1.2. As a benchmark administrator, AIE maintains strong governance structures, which encompass a clear organizational layout and a system to identify and manage potential conflicts of interest. This framework ensures that any judgments or decisions requiring discretion in the benchmark determination process are carried out independently and with integrity.
- 1.3. This document outlines the primary methods by which conflicts of interest are identified, prevented, and managed within the Company.

## 2. Identification and Management of Conflicts of Interest

- 2.1. AIE has established protocols to identify, assess, and manage potential conflicts of interest. Any identified conflicts are documented in a conflicts of interest register and are periodically reviewed in accordance with our governance framework.
- 2.2. Conflicts of interest may arise in areas including:
  - organizational ownership;
  - index design;
  - clients, partners or suppliers;
  - individual employees/directors.
- 2.3. The processes for managing conflicts of interest are reviewed annually by the Company's Board of Directors, or more frequently if a potential conflict emerges
- 2.4. Upon identifying a conflict, management and the Compliance Officer evaluate its nature and decide on the necessary controls to manage it effectively, along with any required disclosures. If satisfactory controls cannot be implemented, the activity in question will either be declined or discontinued.
- 2.5. Given the comprehensive array of mitigating processes, controls, and governance structures in place to address potential conflicts identified within the framework, we believe there are no remaining significant conflicts.

### 3. Areas of Potential Conflicts of Interest

#### 3.1. Organizational Ownership

AIE is a wholly owned by Akros Technologies Inc. (“AT”) Benchmark administration is the responsibility of AIE, which is managed separately from other businesses owned and operated by AT.

Some data used within the Akros Indices are provided by AT. This is data for which AIE has standard contracts in place, therefore no material conflict of interest is considered to arise.

AIE has established a robust governance framework to manage the Akros Indices, which includes:

- the Board of Directors, responsible for approving all new index methodologies and enhancements to existing ones;
- working groups comprised of knowledgeable and experienced employees who support the Board of Directors;
- external advisory committees made up of senior market practitioners, clients, and index users, which provide insights to the Board of Directors and help mitigate potential conflicts of interest; and
- the Compliance Officer, which, together with other internal forums and external advisory committees, constitutes the oversight function of the Company as the benchmark administrator. This function ensures comprehensive oversight of all aspects of the benchmarks administered by AIE.

At each forum, any potential or actual conflicts of interest are carefully evaluated. Upon identification of a conflict, appropriate measures are implemented to either avoid or manage the conflict effectively.

#### 3.2. Index Design

Index methodologies are clearly outlined and publicly accessible on the AIE website (<https://index.engineering/>). These methodologies and related policies are designed to minimize the reliance on expert judgment or discretion. When expert judgment is necessary, it is conducted in accordance with the applicable Statement of Principles and AIE policy on the exercise of expert judgment, with all actions documented and reviewed by the Board of Directors.

Index methodologies undergo regular reviews to ensure they accurately represent the markets they aim to represent. Factors such as country classification, eligible markets, and listing regimes are evaluated by both the external advisory committees and the Board of Directors. Significant changes to index methodologies require market consultations, as stipulated in the *Akros Index Engineering Policy for Benchmark Methodology Changes*.

### **3.3. Clients, Partners and Suppliers**

Index inclusion or exclusion follows the eligibility criteria specified in the index methodology documents, and the administration of these indices is handled independently of any commercial relationships AIE might have with clients, partners, or suppliers.

Any changes to the indices are communicated simultaneously to all index users, ensuring that no advance notice is given to any particular client, partner, or supplier.

### **3.4. Individual Employees and Directors**

All AIE employees are required to adhere to the policies including:

- Conflicts of interest;
- Code of conduct;
- Personal account dealing;
- Confidentiality;
- Whistleblowing;
- Anti-bribery and corruption;
- Financial crime.

AIE employees must complete mandatory training courses and answer questions to assess their understanding of the material. The completion rates of the training program are systematically recorded.

All directors, officers, employees, contractors, consultants, temporary workers, and other personnel at AIE must declare any internal and external positions, appointments, or activities. These declarations are made through the electronic Central Compliance System upon joining the Company, or when any such position, appointment, or activity arises. Annual updates are required to confirm the accuracy of the information.

Any declared internal or external positions, appointments, or activities must be pre-approved by the Compliance Officer. If a potential or actual conflict of interest is identified, the Compliance Officer will determine the necessary actions to manage or avoid the conflict.

Members of external advisory committees are provided with an appointment letter that explains the conflict of interest management process and the requirement to declare any conflicts. Reminders of these obligations are issued at the start of each meeting.

All personnel at AIE are required to declare any possession of material non-public price-sensitive information (“MNPI”) or “inside information”.

All AIE staff members must declare any securities holdings upon joining the Company and annually verify that this information is correct through the electronic Central Compliance System.

Staff members who wish to trade in relevant securities must first obtain permission through the electronic Central Compliance System. The Compliance Officer grants approval for these trades.

The *Akros Index Engineering Whistleblowing Policy* outlines procedures for reporting unethical behavior or breaches of the code of conduct, laws, or regulations.

The whistleblowing policy is applicable to all staff and addresses scenarios where a whistleblower may report malpractice or wrongdoing affecting others, such as other staff, other affiliates, clients, or suppliers. The policy requires that the number and nature of whistleblowing incidents be reported anonymously, where applicable, to the Board of Directors of the relevant regulated entity involved in the incident.

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