



Myrtle Equities

# Internal Governance Committee Charters

This document provides a detailed framework for the structure, responsibilities, and operational guidelines of Myrtle Equities' Index Oversight Committee. It defines the scope and authority of this committee, including its role in ensuring the integrity, transparency, and compliance of the index creation and maintenance processes. This document also outlines decision-making protocols, conflict of interest management, and the procedures for monitoring and reviewing index methodologies. By establishing a clear committee, Myrtle Equities promotes accountability and thorough oversight, aligning with regulatory requirements and industry best practices.

*Index Governance & Oversight  
Methodologies Document*



## Table of Contents

1. Introduction .....	2
2. Purpose and Scope .....	2
3. Governance Framework .....	2
3.1 Structure of the Index Oversight Committee .....	2
3.2 Responsibilities of the Committee .....	2
3.3 Authority of the Committee.....	3
4. Membership and Roles .....	3
4.1 Chairman of the Index Oversight Committee .....	3
4.2 Decision-Making Process .....	3
5. Conflict of Interest Management .....	3
6. Methodology Development and Review .....	4
6.1 Methodology Development.....	4
6.2 Periodic Review.....	4
6.3 Stakeholder Engagement.....	4
7. Compliance and Auditing.....	5
7.1 Regulatory Compliance .....	5
7.2 Internal Audits .....	5
8. Incident Management.....	5
9. Documentation and Record-Keeping.....	5
10. Review and Updates to the Charter.....	5

## 1. Introduction

Myrtle Equities Global LLC (“Myrtle Equities”) is committed to maintaining thorough oversight and detailed governance of its index-related activities and products. This document outlines the framework for the Internal Governance Committee Charters, focusing specifically on the structure, roles, and responsibilities of the Index Oversight Committee (“Committee”). This charter ensures the integrity, transparency, and compliance of Myrtle Equities' index development and maintenance processes, aligning with industry standards and regulatory requirements.

## 2. Purpose and Scope

The Index Oversight Committee is tasked with overseeing all aspects of the design, calculation, maintenance, and review of Myrtle Equities' index products. The purpose of the charter is to define the Committee's responsibilities, establish the scope of its authority, and provide guidelines for its operations. Through this framework, Myrtle Equities ensures that indices are developed and maintained according to objective criteria, with transparent methodologies and robust compliance measures. Specific calculation methodologies will be chosen by the Myrtle Equities' Index Oversight Committee to insure that all index products properly represent their intended purposes.

This document applies to the activities of the Index Oversight Committee and serves as a reference for internal and external stakeholders seeking clarity on governance practices.

## 3. Governance Framework

**3.1 Structure of the Index Oversight Committee.** The Index Oversight Committee operates as the central body for decision-making and oversight concerning Myrtle Equities' indices. This committee oversees all stages of index development; additionally, the Committee will oversee all product maintenance procedures post-launch. The Committee is led by the Chairman, Piotr Kszczot, Founder and Chief Executive Officer of Myrtle Equities Global LLC. The Committee also holds two additional sub-positions (Vice-Chairman and Secretary) within its leadership to insure proper governance over all index-related activities and products.

**3.2 Responsibilities of the Committee.** The Committee's responsibilities include:

- Reviewing and approving index methodologies to ensure they meet market needs and adhere to industry best practices.
- Monitoring the performance, integrity, and accuracy of indices.
- Addressing and mitigating conflicts of interest in index-related decisions.

- Conducting periodic reviews (as seen in section 6.2 Periodic Review) of indices to maintain relevance and alignment with evolving market conditions.
- Responding to stakeholder feedback and incorporating relevant changes into index methodologies.

**3.3 Authority of the Committee.** The Index Oversight Committee has the authority to make decisions on all aspects of index design and maintenance. It is empowered to:

- Approve the creation of new indices or changes to existing ones.
- Suspend or terminate indices in cases of significant market disruption or other extraordinary events.
- Set policies and protocols for data sourcing, validation, and calculation.

## 4. Membership and Roles

**4.1 Chairman of the Index Oversight Committee.** The Committee Chairman holds the following responsibilities:

- Leading Committee meetings and ensuring orderly discussions.
- Setting the agenda and guiding deliberations on key decisions.
- Acting as the primary representative of the Committee in internal and external communications.
- Ensuring that the Committee's actions align with Myrtle Equities' governance principles and regulatory obligations.

**4.2 Decision-Making Process.** Decisions within the Committee are made through consensus or, when necessary, majority vote. The Chairman holds a tie-breaking vote to resolve deadlocks.

## 5. Conflict of Interest Management

The Index Oversight Committee operates under strict policies to manage and mitigate conflicts of interest. These policies include:

- Prohibiting Committee members from participating in decisions where they have a material interest.
- Implementing firewalls and safeguards to ensure the independence of index-related decisions.

- Requiring full disclosure of any potential conflicts to the Chairman prior to discussions or votes.

Through these measures, Myrtle Equities ensures that indices are governed impartially and objectively.

## 6. Methodology Development and Review

**6.1 Methodology Development.** Index methodologies are developed based on objective criteria, leveraging robust data sources and transparent calculation rules. Each methodology is designed to:

- Reflect the intended market or investment strategy accurately.
- Be replicable and free from discretionary bias.
- Incorporate provisions for extraordinary market events or disruptions.

**6.2 Periodic Review.** The Committee conducts regular reviews of all index methodologies to ensure continued relevance and compliance. Reviews are triggered by:

- Scheduled periodic assessments.
- Significant market events or stakeholder feedback.
- Updates to regulatory requirements or industry standards.

The following table outlines the Myrtle Equities' Index Oversight Committee schedule for periodic reviews:

Review Type	Timing	Purpose
Quarterly Review meeting	End of each quarter (March, June, September, December)	Monitor index performance and address any anomalies.
Semi-Annual Methodology Review.	June and December	Ensure methodologies remain relevant and effective.
Annual Compliance Review	December	Verify adherence to regulatory standards and internal policies.
Stakeholder Feedback Sessions	May and November	Gather input from stakeholders and incorporate feedback.
Extraordinary Reviews	As needed	Respond to significant market events or emerging issues.

**6.3 Stakeholder Engagement.** Stakeholder input plays a crucial role in the methodology review process. The Committee actively seeks feedback from market participants, regulators, and other stakeholders to inform its decisions.

## 7. Compliance and Auditing

**7.1 Regulatory Compliance.** The Index Oversight Committee operates in strict adherence to applicable regulations, including the IOSCO Principles for Financial Benchmarks. All decisions and processes are documented to demonstrate compliance.

**7.2 Internal Audits.** The Committee is subject to regular internal audits to evaluate its adherence to governance principles, operational protocols, and regulatory requirements. Audit findings are reviewed by the Chairman and incorporated into corrective actions as needed. Audits are used to ensure that the structural integrity of all index products maintained at the industry standard. This audit will also review all financial records deemed relevant to index-related operations.

## 8. Incident Management

The Index Oversight Committee maintains protocols to address incidents that may affect index integrity or reliability. These include:

- Immediate identification and investigation of anomalies or errors in index calculations.
- Transparent communication with stakeholders regarding the nature of the incident and steps taken to resolve it.
- Implementation of corrective measures to prevent recurrence.

## 9. Documentation and Record-Keeping

All Committee activities, including meeting minutes, decisions, and reviews, are documented and securely stored. Records are maintained for a minimum of five years and are accessible for regulatory or audit purposes.

## 10. Review and Updates to the Charter

This charter is reviewed annually by the Index Oversight Committee and updated as necessary to reflect changes in regulatory requirements, market conditions, and stakeholder expectations. Updated versions are made available on the Myrtle Equities website.

DISCLOSURE. Myrtle Equities Global LLC ("Myrtle Equities," "MEG") is a global index provider located at 228 Park Ave S, New York, NY 10003. Myrtle Equities is a limited liability company registered under the laws of the State of New York and complies with all applicable business and finance-related rules and regulations set forth by the State of New York and the United States government. This document has been prepared to disclose the methodologies used by Myrtle Equities in calculating and maintaining its proprietary index price levels. It is intended solely for informational purposes and is not designed to provide investment, financial, legal, or tax advice. By accessing this document, readers acknowledge and agree that it is their responsibility to consult with appropriate professionals regarding their specific circumstances and requirements. Myrtle Equities is not a financial advisor, broker, or investment advisor. The information provided within this document and any related materials is not intended to be, and should not be construed as, a solicitation, recommendation, endorsement, or offer to buy or sell any securities or other financial instruments. The methodologies described herein are developed and maintained solely for the purpose of creating and managing proprietary indices.

While Myrtle Equities strives to ensure the accuracy, reliability, and completeness of the information provided in this document, it does not guarantee or warrant the same. All information and methodologies are provided "as is," without any express or implied warranties, including but not limited to warranties of merchantability, fitness for a particular purpose, or non-infringement. Readers are advised to verify any information obtained from this document before relying on it for any purpose. Investing in financial products that are linked to or based on the indices calculated by Myrtle Equities involves inherent risks, including but not limited to market volatility, currency fluctuations, and changes in economic or regulatory conditions. Myrtle Equities is not responsible for any losses, damages, or liabilities that may arise from reliance on the methodologies, data, or indices provided.

Myrtle Equities complies with all applicable regulations governing index providers, including those relating to transparency, accuracy, and conflict of interest mitigation. However, the regulatory landscape may evolve, and Myrtle Equities reserves the right to amend its methodologies and disclosures to remain in compliance with all relevant laws and guidelines. All intellectual property rights in the methodologies, indices, and related materials developed by Myrtle Equities are the exclusive property of Myrtle Equities Global LLC. Unauthorized use, reproduction, or distribution of any such materials is strictly prohibited and may result in legal action.

Any reference to third-party data, tools, or resources within this document is for illustrative purposes only and does not constitute an endorsement or affiliation. Myrtle Equities disclaims any responsibility for the accuracy, reliability, or completeness of information provided by third-party sources.

Myrtle Equities reserves the right to modify or update this Disclosure Statement at any time without prior notice. Any changes will be effective immediately upon publication.