



Myrtle Equities

Internal Compliance Policies

This document outlines the comprehensive guidelines and standards Myrtle Equities adheres to in maintaining compliance with applicable regulatory frameworks. It defines the principles, procedures, and internal controls implemented to ensure that the firm's operations, including index creation, calculation, and maintenance, align with industry regulations and best practices. This document also addresses risk management, employee conduct, data security, and audit protocols, emphasizing Myrtle Equities' commitment to integrity, transparency, and accountability in all aspects of its business activities.

*Overview of Regulatory Compliance
Methodologies Document*



Table of Contents

| | |
|--|---|
| 1. Introduction | 2 |
| 2. Purpose and Scope | 2 |
| 3. Principles of Compliance | 2 |
| 3.1 Integrity and Transparency | 2 |
| 3.2 Accountability | 2 |
| 3.3 Proactive Risk Management | 2 |
| 4. Key Compliance Policies | 3 |
| 4.1 Regulatory Adherence | 3 |
| 4.2 Employee Conduct and Training | 3 |
| 4.3 Data Management and Security | 3 |
| 4.4 Monitoring and Reporting | 3 |
| 5. Compliance Processes | 3 |
| 6. Roles and Responsibilities | 4 |
| 6.1 Compliance Team | 4 |
| 6.2 Senior Management | 4 |
| 6.3 Employees | 4 |
| 7. Auditing and Continuous Improvement | 4 |
| 8. Review and Updates to Policies | 4 |
| 9. Conclusion | 5 |
| DISCLOSURE | 6 |

1. Introduction

Myrtle Equities Global LLC (“Myrtle Equities”) is committed to upholding the highest standards of regulatory compliance in its operations as an index provider. This document serves as a comprehensive guide to the internal compliance policies implemented across the organization. These policies are designed to ensure that all activities related to the design, calculation, and maintenance of indices are conducted in alignment with applicable legal, regulatory, and industry standards. Through robust compliance measures, Myrtle Equities safeguards the integrity, reliability, and transparency of its indices while promoting trust and confidence among stakeholders.

2. Purpose and Scope

The purpose of this document is to provide a detailed framework of Myrtle Equities’ internal compliance policies, including the principles, controls, and procedures in place to monitor and enforce compliance. The scope of these policies encompasses all aspects of the company’s operations, including data management, employee conduct, risk management, and audit protocols. These policies apply to all employees, contractors, and stakeholders who engage with Myrtle Equities in any capacity. By clearly defining compliance expectations, Myrtle Equities aims to mitigate risks, prevent misconduct, and ensure adherence to all relevant regulatory requirements.

3. Principles of Compliance

3.1 Integrity and Transparency

At the core of Myrtle Equities’ compliance framework are the principles of integrity and transparency. All activities are conducted with a commitment to honesty, ethical behavior, and openness. These principles guide the organization’s decision-making processes and interactions with stakeholders, regulators, and the broader financial community.

3.2 Accountability

Myrtle Equities fosters a culture of accountability by clearly defining roles and responsibilities for compliance across all levels of the organization. Employees and leadership are expected to uphold these standards and actively contribute to a compliant operating environment.

3.3 Proactive Risk Management

Compliance at Myrtle Equities is underpinned by a proactive approach to risk management. The company identifies, assesses, and mitigates risks associated with its operations, ensuring that potential issues are addressed before they escalate into significant challenges.

4. Key Compliance Policies

4.1 Regulatory Adherence

Myrtle Equities strictly adheres to all applicable regulations, including those established by global and regional regulatory bodies. This includes compliance with the IOSCO Principles for Financial Benchmarks and any jurisdiction-specific requirements governing the creation and maintenance of indices. The organization's legal and compliance teams continuously monitor regulatory developments to ensure that all policies remain up to date.

4.2 Employee Conduct and Training

All employees of Myrtle Equities are required to act in accordance with the company's code of conduct, which emphasizes ethical behavior, professionalism, and compliance with regulatory obligations. Regular training sessions are conducted to educate employees on compliance policies, emerging regulatory trends, and best practices. Employees are encouraged to report any suspected violations through established whistleblowing channels, which ensure confidentiality and protection from retaliation.

4.3 Data Management and Security

Data integrity and security are critical components of Myrtle Equities' compliance framework. The company employs robust protocols to ensure the accuracy, confidentiality, and security of data used in index calculations. This includes strict access controls, encryption of sensitive information, and regular audits of data management processes to identify and rectify vulnerabilities.

4.4 Monitoring and Reporting

Compliance monitoring is conducted on an ongoing basis to identify and address potential issues. This includes automated systems for tracking data anomalies, manual reviews of processes, and routine internal audits. The results of compliance monitoring are documented and reported to the senior management team, ensuring that any identified risks are promptly addressed.

5. Compliance Processes

The table below outlines key compliance processes implemented by Myrtle Equities:

| Process | Description | Frequency |
|----------------------------|---|---------------|
| Regulatory Updates Review | Continuous monitoring of regulatory changes and updates to internal policies. | Monthly |
| Employee Training Programs | Educational sessions on compliance standards, emerging regulations, and ethics. | Quarterly |
| Data Validation Protocols | Verification of data accuracy and integrity used in index calculations. | Daily |
| Internal Compliance Audits | Comprehensive review of compliance adherence across all operations. | Semi-Annually |

| | | |
|---------------------------------|---|-----------|
| Internal Reporting and Response | Mechanism for reporting and addressing compliance violations or incidents. | As Needed |
| Stakeholder Feedback Review | Collection and Analysis of Stakeholder input to inform compliance measures. | Annual |

6. Roles and Responsibilities

6.1 Compliance Team

The compliance team at Myrtle Equities is responsible for the development, implementation, and oversight of internal compliance policies. This team ensures that all operations align with regulatory requirements and works closely with other departments to address compliance-related challenges. Key responsibilities include conducting audits, managing risk assessments, and providing training and guidance to employees.

6.2 Senior Management

Senior management plays a critical role in fostering a culture of compliance. They are responsible for allocating resources to support compliance initiatives, reviewing audit findings, and ensuring that the company's strategic goals align with regulatory obligations. Management also serves as the final authority for approving updates to compliance policies.

6.3 Employees

All employees are expected to familiarize themselves with the company's compliance policies and actively adhere to them. Employees are encouraged to raise concerns or report potential violations to the compliance team through designated channels.

7. Auditing and Continuous Improvement

Regular audits are conducted to evaluate the effectiveness of Myrtle Equities' compliance policies. These audits include assessments of data security, employee conduct, and adherence to regulatory requirements. Audit findings are used to identify areas for improvement and to update policies as needed. Myrtle Equities is committed to continuous improvement and regularly solicits feedback from stakeholders to refine its compliance framework.

8. Review and Updates to Policies

This document is reviewed annually to ensure its relevance and alignment with evolving regulatory and industry standards. Updates are approved by senior management and communicated to all

employees through training sessions and internal communications. The most current version of the document is available on the Myrtle Equities website.

9. Conclusion

The Internal Compliance Policies document reflects Myrtle Equities' unwavering commitment to integrity, transparency, and accountability. By implementing robust compliance measures, the organization ensures that its operations align with regulatory requirements and industry best practices. These policies serve as a foundation for fostering trust and confidence among stakeholders, reinforcing Myrtle Equities' position as a reliable and ethical index provider.

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.