



Myrtle Equities

# Index Governance Framework

The "Index Governance Framework" is a comprehensive document detailing the principles, processes, and controls that govern the development, maintenance, and oversight of Myrtle Equities' indices, ensuring transparency, integrity, and compliance with regulatory standards.

*Index Governance & Oversight  
Methodologies Document*



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**1. Introduction.** Myrtle Equities Global LLC (“Myrtle Equities”) is committed to maintaining the highest standards of transparency, integrity, and compliance in the creation and oversight of its indices. This Index Governance Framework outlines the principles, processes, and controls governing the development, calculation, and maintenance of Myrtle Equities’ indices, ensuring adherence to applicable regulations and best practices.

## 2. Governance Principles

Myrtle Equities adheres to the following governance principles:

- **Transparency:** Providing clear and accessible information about index methodologies, governance policies, and periodic updates.
- **Independence:** Ensuring decisions related to index creation and maintenance are free from conflicts of interest.
- **Integrity:** Upholding ethical practices in data sourcing, calculation, and dissemination of index levels.
- **Compliance:** Aligning with relevant regulatory requirements and industry standards, including adherence to the IOSCO Principles for Financial Benchmarks.

## 3. Governance Structure

The governance structure of Myrtle Equities includes the following key elements:

**3.1 Index Committee.** The Index Committee is responsible for overseeing the design, implementation, and periodic review of index methodologies. Its primary responsibilities include:

- Approving new index launches and changes to existing methodologies.
- Monitoring the performance and relevance of indices.
- Ensuring compliance with applicable regulations and standards.

**3.2 Independent Oversight Committee.** An Independent Oversight Committee reviews the decisions of the Index Committee to ensure fairness and impartiality. It provides:

- Oversight of potential conflicts of interest.
- Periodic audits of index calculation and governance processes.

**3.3 Internal Controls and Compliance.** Myrtle Equities’ compliance team ensures that policies, procedures, and practices align with regulatory expectations. Internal controls include:

- Periodic reviews of index methodologies.
- Monitoring adherence to governance principles.
- Conducting regular audits.

## 4. Methodology Development and Review

**4.1 Methodology Design.** Each index methodology is designed to meet specific market needs and is governed by:

- Clear rules and objective criteria.
- Robust calculations based on reliable and transparent data sources.

**4.2 Periodic Review.** Myrtle Equities conducts regular reviews of all index methodologies to ensure:

- Accuracy and relevance of indices.
- Responsiveness to market developments and stakeholder feedback.

**4.3 Stakeholder Engagement.** Stakeholders are encouraged to provide feedback on index methodologies, which is considered during periodic reviews.

## 5. Conflict of Interest Management

Myrtle Equities maintains policies to mitigate potential conflicts of interest, including:

- Segregating business functions to ensure independence in decision-making.
- Implementing firewalls to prevent undue influence from external parties.
- Disclosing any material conflicts of interest to stakeholders.

## 6. Data Integrity and Validation

Myrtle Equities ensures the accuracy and reliability of index calculations by:

- Using reputable and transparent data sources.
- Employing robust validation processes to detect and correct anomalies.
- Regularly reviewing data sources for continued reliability.

## 7. Index Calculation and Dissemination

**7.1 Calculation Process.** Index levels are calculated using objective and pre-defined rules. Myrtle Equities employs automated systems to minimize human error and ensures real-time monitoring.

**7.2 Dissemination.** Index levels, along with methodology documents, are published on the Myrtle Equities website and other relevant platforms to ensure timely access for stakeholders.

## 8. Incident Management

Myrtle Equities has established protocols for identifying, managing, and resolving incidents that may affect index integrity. This includes:

- Immediate investigation of anomalies.
- Transparent communication with stakeholders.
- Remediation measures to prevent recurrence.

## 9. Regulatory Compliance

Myrtle Equities complies with all applicable laws, regulations, and industry standards, including:

- The IOSCO Principles for Financial Benchmarks.
- Local regulatory requirements in jurisdictions where its indices are used.

## 10. Review and Updates to the Framework

This Index Governance Framework is reviewed annually and updated as necessary to reflect changes in regulatory requirements, market practices, and stakeholder feedback. Updated versions are published on the Myrtle Equities website.

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