



RETURN ON DISABILITY

**Return on Disability US LargeCap
ETN Total Return USD Index
Index Methodology**

September 2014

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Introduction

Donovan Group LLC indices are designed to capture the shareholder value creation indicated by publically traded firms acting in the global market of disability. Companies in the Return on Disability Indices are considered by Donovan Group to be the top firms in disability with respect to creation of shareholder value. The Return on Disability US LargeCap ETN Total Return USD Index is an equal weighted equity index. It identifies the top 100 publicly traded large-cap companies in the United States with respect to disability as it relates to creation of shareholder value using a publically disclosed research model called the Return on Disability Binary model.

The indices should be fair, meaning that an investor who buys all the stocks in an index with correct index weights can achieve the same performance that Donovan Group or its designee calculates.

PART A – Definitions

For the purposes of these Index Rules:

“Announcement Date” means a date that is twenty Index Business Days before the last date of the fourth quarter of each fiscal year (i.e. twenty Index Business Days prior to the last day of December each year), where the Index Owner shall publically announce the new Index Constituents;

“Annual Dollar Value Traded” means for any Share the sum of the Daily Turnover for each Index Business Day for the preceding year for as determined by the Index Calculation Agent;

“Basket” means the basket of Shares, constituting the relevant Index. Shares constituting the Basket are selected from the members of the Share Universe according to the methodology detailed in Part B (*Index Constituent Selection*);

“Corporate Action” means, without limitation, any dividend, conversion, subscription rights, subdivision, consolidation, redemption, merger, rights relating to takeovers or other offers or capital re-organisation, capitalisation issue, rights issue, redenomination, renominatisation or other event or right which is similar to any of the forgoing items and which affects any Index Constituent;

“Daily Turnover” means, for any Share, the daily sum of the products of (i) each trade price of such Share on the Exchange and any Related Exchanges for such Share and (ii) the traded volume of such trade for such Share on the relevant Exchange or Related Exchange, as published by Bloomberg (or any successor) in the “TURNOVER” field relating to such Share.

“Data Sources” means Bloomberg, Factset, ISS and any other generally available source selected by the Index Calculation Agent acting in a commercially reasonable manner. The Index Calculation Agent does not take any responsibility for the accuracy of data sourced from the Data Sources. In the event of data inaccuracy or error made by Data Sources (as determined by the Index Calculation Agent), the Index Calculation Agent reserves the right to make commercially reasonable adjustment to the data provided by the Data Sources;

“Exchange” means the relevant exchange on which a Share is primarily traded including any successor to any such exchange or quotation system to which trading in any Share has temporarily relocated (provided that the Index Calculation Agent has determined that there is comparable liquidity for that Index Constituent on such temporary substitute exchange or quotation system as on the original exchange);

“Ex-Date” is the date on, or after which, a stock trades ex-dividend;

“General Banking Moratorium” means the declaration of a general moratorium in respect of banking activities in London or New York;

“Index” means The Return on Disability US LargeCap ETN Total Return USD Index;

“Index Adjustment Event” means any of the following events:

- (a) the Index Calculation Agent determines, at any time, that an Index Force Majeure Event occurs or is continuing;
- (b) the Index Calculation Agent determines, at any time, that there has been (or there is pending) a change in taxation (i) generally affecting commercial banks organized and subject to tax in the United Kingdom (including, but not limited to, any tax generally imposed on commercial banks organized and subject to tax in the United Kingdom), or (ii) affecting market participants in the United Kingdom or the United States generally who hold positions in any of the Index Constituents;
or
- (c) a change shall have been made to any of the Index Constituents or there shall have occurred any other event that would make the calculation of an Index impossible or infeasible, technically or

otherwise, or that makes an Index non-representative of market prices of the Index Constituents or undermines the objectives of an Index or the reputation of an Index as a fair and tradable index.

“Index Base Date” means January 3, 2012 and is the date on which the Index Level for any Index is deemed to have been at 100.0000;

“Index Business Day” means any day which is a New York Stock Exchange trading business day, and a NASDAQ trading business day;

“Index Calculation Agent” means the entity appointed by the Index Owner to administer, calculate and publish the Index Level in accordance with these Index Rules, such entity being NYSE Group Inc. and its affiliates or any successor thereto;

“Index Commencement Date” in respect of an Index, is September 9, 2014.

“Index Committee” means the committee formed to oversee the integrity of the rules and provide clarifying guidance on the rules where required, although every effort is made to ensure the rules are clear and non-discretionary;

“Index Constituent” means, in respect of an Index, each of the Shares included in such Index and selected in accordance with Part B (*Index Constituent Selection*). For the avoidance of doubt, the Index Constituents on each Rebalancing Date during the Rebalancing Period shall be the New Index Constituents and the Old Index Constituents;

“Index Currency” means, in respect of an Index, USD;

“Index Force Majeure Event” means an event or circumstance (including, without limitation, a systems failure, natural or man-made disaster, act of God, armed conflict, act of terrorism, riot or labour disruption or any similar intervening circumstance) that is beyond the reasonable control of the Index Calculation Agent and that the Index Calculation Agent determines affects any Index, any Index Constituent or the methodology on which any Index is based or the Index Calculation Agent’s ability to calculate and publish any Index;

“Index Level” means, in respect of an Index, the level of The Return on Disability US LargeCap ETN Total Return Index on any Index Business Day.

“Index Market Disruption Event” means, with respect to any Index Constituent, the occurrence of one or more of the following events if, in the determination of the Index Calculation Agent such event is material:

- (a) a suspension, absence or limitation of trading in (1) such Index Constituent in its primary market, as determined by the Index Calculation agent, or (2) futures or options contracts relating to such Index Constituent in the primary market for those contracts, as determined by the Index Calculation Agent, in either case for more than two hours of trading or at any time during the 30 minute period preceding the close of the regular trading session in such market or, if the relevant valuation time is not the close of the regular trading session in such market, the relevant valuation time;
- (b) any event that disrupts or impairs, as determined by the Index Calculation Agent, the ability of market participants in general to (1) effect transactions in, or obtain market values for, such Index Constituent in its primary market, or (2) effect transactions in, or obtain market values for, futures or options contracts relating to such Index Constituent in the primary market for those contracts, in either case for more than two hours of trading or at any time during the 30 minute period preceding the close of the regular trading session in such market or, if the relevant valuation time is not the close of the regular trading session in such market, the relevant valuation time;
- (c) the closure on any Scheduled Trading Day of the primary market for such Index Constituent prior to the scheduled weekday closing time of that market (without regard to after hours or any other trading outside of the regular trading session hours) unless the earlier closing time is announced by

the primary market at least one hour prior to the earlier of (1) the actual closing time for the regular trading session on such primary market on such Scheduled Trading Day for such primary market and (2) the submission deadline for orders to be entered into the relevant exchange system for execution at the close of trading on such Scheduled Trading Day for such primary market;

- (d) any Scheduled Trading Day on which (1) the primary market for such Index Constituent or (2) the exchanges or quotation systems, if any, on which futures or options contracts relating to such Index Constituent are traded, fails to open for trading during its regular trading session;
- (e) General Banking Moratorium;
- (f) the occurrence of an event that makes it impossible or not reasonably practicable on any Index Business Day for the Index Calculation Agent to obtain the price of such Index Constituent, or any other price for the purposes of calculating the Index Level in a manner reasonably acceptable to the Index Calculation Agent; or
- (g) an FX Disruption event occurs. For these purposes, “**FX Disruption**” means the occurrence of any event after the Index Base Date that results in the Index Calculation Agent being unable, after using commercially reasonable efforts, to convert a Foreign Currency into the Index Currency on an Index Business Day.

The following events will not be Index Market Disruption Events:

- (i) a limitation on the hours or number of days of trading in the relevant market or relevant exchange only if the limitation results from an announced change in the regular business hours of the relevant market; and
- (ii) a decision to permanently discontinue trading in futures or options contracts relating to the Index or any Index Constituent.

For this purpose, an “absence of trading” on an exchange or market will not include any time when the relevant exchange or market is itself closed for trading under ordinary circumstances.

In contrast, a suspension or limitation of trading in an Index Constituent in its primary market, or in futures or options contracts relating to an Index Constituent, if available, in the primary market for those contracts, by reason of any of:

- (i) a price change exceeding limits set by that market,
- (ii) an imbalance of orders relating to those securities or those contracts, as applicable, or
- (iii) a disparity in bid and ask quotes relating to those securities or those contracts, as applicable,

will constitute a suspension or material limitation of trading.

“**Index Owner**” means Donovan Group LLC in its capacity as the owner of the intellectual property and licensing rights relating to the Index;

“**Liquidity Threshold**” means, for each Share, a requirement that (i) the ratio of Annual Dollar Value Traded on all eligible exchanges to float adjusted market capitalization be 1.00 or greater, and (ii) a minimum of 250,000 Shares be traded in each of the six months leading up to the relevant Selection Date;

“**Market Cap Threshold**” is USD 2 billion;

“**New Index Constituents**” means, during a Rebalancing Period, the Shares selected on the immediately preceding Selection Date that are to be held with respect to the 1st Rebalancing Date of the current Rebalancing Period, in accordance with Section 2 (*Index Rebalancing*) of Part C (*Index Calculation Methodology*);

“Old Index Constituents” means, during a Rebalancing Period, the current Index Constituents as selected on the Selection Date immediately preceding the most recent Rebalancing Date in accordance with Section 2 (*Index Rebalancing*) of Part C (*Index Calculation Methodology*);

“Ordinary Cash Dividend” means, a regular scheduled cash dividend, as declared by the issuer of the relevant Share;

“Price” means, in respect of a Share, the official closing price of such Share on the Exchange on any trading day. If such price is not denominated in the relevant Index Currency, the Index Calculation Agent shall convert the price to the Index Currency by applying the relevant Currency Spot Rate;

“Rebalancing Date” means each Index Business Day included in the Rebalancing Period;

“Rebalancing Period” means a period of four consecutive Index Business Days starting from the second Index Business Day of every March, June, September and December. In addition December will include new Index Constituents selected on the Selection Date. If such day is not an Index Business Day, then the immediately following Index Business Day will be selected subject to the provisions in Part C (*General Rules*);

“Related Exchange” means in relation to a Share, each exchange, or quotation system other than an Exchange where the Share is traded or where trading has a material effect (as determined by the Index Calculation Agent acting in a commercially reasonable manner) on the overall market for futures or options contracts relating to that Share;

“Relevant Region” means, in relation to an Index, the United States of America;

“Scheduled Trading Day” means, with respect to an Index Constituent, any day on which the primary market for such Index Constituent is scheduled to be open for trading for its regular trading session, as determined by the Index Calculation Agent;

“Selection Date” means a date that is twenty five Index Business Days before the last date of the fourth quarter of each fiscal year (i.e. twenty five Index Business Days prior to the last day of December each year), the Index Owner shall determine a list of stocks according to PART B – Index Constituent Selection below based on the relevant data after the close of trading, 4:15pm New York time

“Share Currency” means, in relation to a Share, the currency in which such Share is quoted on the Exchange;

“Share Issuer” means, in relation to a Share or Index Constituent, the issuer of such Share or Index Constituent;

“Share Universe” means those Shares for each Index as described in Section 1.1 of Part B (*Index Constituent Selection*);

“Shares” means, any ordinary shares or stocks listed on an Exchange and ineligible shares include REITs, limited partnerships, master limited partnerships, OTC bulletin board issues, closed-end funds, exchange-traded funds, exchange-traded notes, royalty trusts, tracking stocks, preferred shares, unit trusts, equity warrants, convertible bonds, investment trusts, American Depositary Receipts (ADRs), American Depositary Shares (ADSs), mortgage REITS and master limited partnership investment trust units;

“Special Cash Dividend” has the meaning described in Section 4.3 of Appendix 1;

“USD” means the United States dollar.

“US Fed Fund Effective Rate” means the interest rate at which depository institutions lend balances to each other overnight, published on Bloomberg page FEDL01 Index;

“Withholding Tax Rate” is intended to represent the rate of tax levied by any relevant governmental or other taxing authority on a stock dividend payment without regard to the effect of any relevant treaty

between authorities in any relevant jurisdiction. The Index Calculation Agent will determine the Withholding Tax Rate by reference to such publicly available information sources as it deems appropriate. In the event of any inconsistency between the rate displayed on the information sourced used by the Index Calculation Agent for purposes of this definition and the actual rate of tax levied on a stock dividend by any relevant governmental or other taxing authority, the Index Calculation Agent may rely on and use the rate displayed by such information source. If for any reason the Withholding Tax Rate is unavailable from any publicly available information sources that Index Calculation Agent deems to be appropriate, the Index Calculation Agent shall determine the Withholding Tax Rate in a commercially reasonable manner by reference to such factors as the Index Calculation Agent deems appropriate. The Withholding Tax Rate is subject to change from time to time.

PART B – Index Constituent Selection

1. Index Composition

This section describes how the Index Constituents on each Selection Date are selected out of the Share Universe and how the number of Shares for each Index Constituent is determined in order for each Index to reflect the performance of a portfolio of US stocks with The “Sub-Universe” shall be determined by selecting the Shares in the Share Universe which meet the Market Capitalisation and Liquidity Criteria and applying the Single Issuer Constraint as detailed below.

(1) Market Capitalisation and Liquidity Criteria

- The market capitalisation of a Share in the Share Universe on the Selection Date must be equal to or over the **Market Capitalisation Threshold** (the “Market Capitalisation”); and
- The Share in the Share Universe on the Selection Date must meet the **Liquidity Threshold** (the “Liquidity Criteria”); and

The Index Sponsor shall determine which Shares meet the Market Capitalisation and Liquidity Criteria on the basis of data from Bloomberg (or any successor Data Source) on the Selection Date. If the Index Sponsor determines that any required information in relation to a Share is not available on the Bloomberg (or any successor Data Source), that Share shall be excluded from further analysis and shall not form part of the Sub-Universe.

(2) Single Issuer Constraint

If, after application of the Market Capitalisation and Liquidity Criteria set out above, more than one class of Shares or more than one listing of a Share issued by the same Share Issuer remains, then the Index Sponsor will select the class or listing of Share which it determines is most appropriate to be included in the “Sub-Universe”. Such determination is based on, the following criteria:

- Liquidity (as determined by reference to the Three Month Average Daily Value Traded): the most liquid class or listing of Share of the Share Issuer will be selected.

(3) Domicile

U.S. companies. For index purposes, a U.S. company has the following characteristics:

- File 10-K annual reports and should not be considered foreign entity by SEC.
- The primary listing of the common stock is the NYSE (including NYSE Arca and NYSE MKT), the NASDAQ Global Select Market, the NASDAQ Select Market or the NASDAQ Capital Market. ADRs are not eligible for inclusion.
- A corporate governance structure consistent with U.S. practice.

(4) Treatment of IPOs

Initial public offerings are immediately eligible for index inclusion subject to (1) and (2) above.

(5) Profitability

The Share company must have “financial viability,” which is usually measured as four consecutive quarters of positive as-reported earnings. As-reported earnings are determined by reference to Generally Accepted Accounting Principles (GAAP) net income excluding discontinued operations and extraordinary items.

(6) Return on Disability Ranking

As defined by a proprietary model via The Index Owner, all firms in the universe (as below) are given a result of observation (a ‘score’ between 0 and 1) reflecting said firm’s action in the disability market with

respect to creation of shareholder value. These firms are then ranked, from highest to lowest, with the top 100 scores meeting substantially all of the below criteria making up the constituents of the index.

The Index Owner creates an initial list of stocks of companies that have met substantially all the criteria set forth below and ranks them based on the Return on Disability Binary Result which ranks companies based on their (a) talent binary score, (b) customer binary score and (c) productivity binary score. Each of these scores is described further immediately below.

(a) Talent Binary Score

The talent binary score has two components: (1) attract and hire and (2) getting the firm ready. 'Attract and hire' refers to basic activities that any company can engage in to cause people with disabilities to apply for open positions and results in the company hiring these individuals. 'Getting the firm ready' refers to efforts to prepare the physical and cultural environment of a company to increase the chance of success for employees with disabilities, their managers and their colleagues. These efforts must be publically observable independent of the target company's direct input. Each company is evaluated for each component based on the criteria described below. If a company meets the criteria of a particular category, they receive a score of a "1" for that component. If a company does not meet the criteria for a particular category, they receive a score of a "0" for that component. Each criteria is sourced, compiled and calculated by the Index Owner as described below.

Attract and Hire (must meet 2 of the 3 criteria below to receive a score of "1")

1. Exists formal process to interview candidates with disabilities with published numbers.

- Sourced: Company statements, websites and partner relationships
- Compiled: Annual audit independent of company
- Calculated: Visible alternate contact info, successful partners

2. Statement of actual hires of persons with disabilities with published numbers.

- Sourced: Company statements, government reports
- Compiled: Annual audit independent of company
- Calculated: Self-reporting publicly, affirmative action audits

3. Career-focus message to attract persons with disabilities (for example, certain companies partner with organizations to attract candidates with business/talent-driven messages, internships and scholarships)

- Sourced: Company statements, websites and partner relationships
- Compiled: Annual audit independent of company
- Calculated: Non-legal messaging by – or on behalf of – company

Getting the Firm Ready (must meet 1 of 3 criteria below to receive score of "1")

1. Roll from curb to interview without barrier.

- Sourced: Company headquarter visit
- Compiled: Annual audit independent of company (as needed)
- Calculated: No steps, auto door, reception process

2. Business-focused message to employees.

- Sourced: Company statements

- Compiled: Annual audit independent of company
- Calculated: Self-reporting publicly

3. Legal compliance.

- Sourced: Company statements, websites and lawsuits
- Compiled: Annual audit independent of company
- Calculated: Statement of effort by company, government lawsuit settled/lost

(b) Customer Binary Score

The customer binary score has two components: (1) product development and (2) customer experience. ‘Product development’ refers to action taken by the firm to gather and utilize insights from people with disabilities to improve the over-all user experience of a firm’s core product or service. ‘Customer experience’ refers to efforts by the company to manage the interactions within retail, broadcast and online environments where customers interact with brands and purchase products include the demands of people with disabilities and act on their desires for branded experiences. These efforts must be publically observable independent of the target company’s direct input. Each company is evaluated for each component based on the criteria described below. If a company meets the criteria of a particular category, they receive a score of a “1” for that component. If a company does not meet the criteria for a particular category, they receive a score of a “0” for that component. Each criteria is sourced, compiled and calculated by The Index Owner as described below under each component.

Product Development (must meet 1 of 3 criteria below to receive a score of “1”)

1. Evidence of access features in product (for example, makers of electronic goods include multiple features to allow their products to be used by people with disabilities as part of their software programming).

- Sourced: Feature audit, 3rd party public reviews (expert & lay)
- Compiled: Annual audit (independent of company)
- Calculated: Functional needs met while delighting core customer

2. Evidence of access features in service offering.

- Sourced: Feature audit, 3rd party public reviews (expert & lay)
- Compiled: Annual audit independent of company
- Calculated: Functional needs met while delighting core customer

3. Evidence of access features in packaging (for example, consumer goods firm designs packaging that makes their product easily accessible for people with disabilities).

- Sourced: Feature audit, 3rd party public reviews (expert & lay)
- Compiled: Annual audit independent of company
- Calculated: Functional needs met while delighting core customer

Experience (must meet 1 of the 2 criteria below to receive a score of “1”)

1. At least 1 person with disability ‘mention’ in primary-channel advertisements (i.e., mainstream advertisements include people with disabilities)

- Sourced: Public advertisements (5 years)
- Compiled: Annual audit independent of company
- Calculated: Text, audio or visual cue

2. At least 2 retail access enhancements. (actual or test)

- Sourced: Audits of retail environments (secret shopper)
- Compiled: Annual audit independent of company
- Calculated: Non-ADA activity that improves core shopping experience

(c) Productivity Binary Score

The productivity binary score has two components: (1) employee tools and (2) process change. 'Employee tools' refers to basic activities that any company can engage in to cause people with disabilities to be as productive as possible and put in place the corporate infrastructure to capture/foster future productivity enhancements. 'Process change' refers to efforts to employ people with disabilities and leverage their talents and insights to drive down costs in process-heavy environments. These efforts must be publically observable independent of the target company's direct input. Each company is evaluated for each component based on the criteria described below. If a company meets the criteria of a particular category, they receive a score of a "1" for that component. If a company does not meet the criteria for a particular category, they receive a score of a "0" for that component. Each criteria is sourced, compiled and calculated by The Index Owner as described below under each component.

Employee Tools (must meet 1 of the 2 criteria below to receive a score of "1")

1. Published accommodations process.

- Sourced: Company statements, websites and partner relationships
- Compiled: Annual audit independent of company
- Calculated: Visible accommodation statements/features, public case studies

2. Existence of an Employee Resource Group.

- Sourced: Company statements, media reports
- Compiled: Annual audit independent of company
- Calculated: Firm reported or media

Process Change (must meet both of 2 criteria below to receive a score of "1")

1. Public statements that firm captures process innovation from persons with disabilities to increase productivity (for example, a company mentions on their website that productivity gains have been made in distribution centers as a result of hiring persons with disabilities).

- Sourced: Company statements, websites and partner relationships
- Compiled: Annual audit independent of company
- Calculated: Aware of productivity enhancements and actively seeking

2. Piloted in at least one facility on an ongoing basis.

- Sourced: Company statements, websites and partner relationships
- Compiled: Annual audit independent of company
- Calculated: Statement of pilot

As shown below in Tables 1 and 2 the weight given to each of the three scores and the two components which comprise each score varies depending on the industry that each company operates in.

After the weight is applied to each score and component as shown in the table above, The Index Owner then ranks the companies from highest to lowest (the “RoD Ranking”). The top 100 stocks in the RoD Ranking (the “index components”) will be included in the Index beginning on the next reconstitution date (as defined below) which is ten trading days after the index Announcement Date. The index components will be included in the RoD Index for twelve months after the reconstruction date until the next annual rebalancing date, subject to the deletion procedures described below. In the event that two Return on Disability Rankings are the same, the stock with the highest “financial viability,” which is usually measured as the last quarters as-reported earnings, will be selected. As-reported earnings are determined by reference to Generally Accepted Accounting Principles (GAAP) net income excluding discontinued operations and extraordinary items.

Table 1

Bucket	Consumer Discretionary	Consumer Staples	Energy	Financials	Health Care	Industrials
Customer	70%	70%	15%	65%	80%	20%
Productivity	15%	15%	10%	5%	10%	50%
Talent	15%	15%	75%	30%	10%	30%
Attract and Hire	70%	70%	70%	70%	70%	70%
Getting the Firm Ready	30%	30%	30%	30%	30%	30%
Product Development	20%	20%	40%	30%	0%	40%
Experience	80%	80%	60%	70%	100%	60%
Employee Tools	40%	40%	40%	40%	40%	40%
Process Change	60%	60%	60%	60%	60%	60%

Table 2

Bucket	Information Technology	Materials	Telecommunications Services	Utilities
Customer	50%	0%	40%	50%
Productivity	20%	20%	30%	10%
Talent	30%	80%	30%	40%
Attract and Hire	70%	70%	70%	70%
Getting the Firm Ready	30%	30%	30%	30%
Product Development	60%	0%	30%	0%
Experience	40%	100%	70%	100%
Employee Tools	40%	40%	40%	40%
Process Change	60%	60%	60%	60%

2 Determination of the Weights

The weight of each newly selected Share is determined on the relevant Selection Date. The new Shares selected are equally weighted.

The final weights of the new Shares selected are calculated according to the following iterative procedure:

Step 1: A first set of weights is calculated as follows:

$$w_{(1)}^i = \frac{1}{N}$$

Where:

- N is the total number of new Shares selected.

The Index owner will declare new Index Constituents on the Annocument Date as per Part D General Rules in section 4: Index Announcements and Adjustments

1. Consequences of Index Adjustment Event, Index Market Disruption Event

1.1 If an Index Adjustment Event occurs on any Index Business Day that the Index Calculation Agent determines, affects an Index, the Index Calculation Agent may:

- 1.1.1** make such determinations and/or adjustments as the Index Calculation Agent considers necessary in order to maintain the objectives of such Index, in relation to (a) the methodology used to calculate such Index or (b) the Index Level;
- 1.1.2** select a successor Index Constituent to replace the Index Constituent affected by the Index Adjustment Event in order to maintain the objectives of the Index;
- 1.1.3** if the Index Calculation Agent determines that the measures described in subsections 1.1.1 and 1.1.2 are not feasible or are not capable of producing the results that are consistent with the objectives of the relevant Index, defer or suspend publication of the Index Level and any other information relating to such Index until it determines that no Index Adjustment Event is continuing;
- 1.1.4** if the Index Business Day on which the Index Adjustment Event occurs or is continuing is a Selection Date or Rebalancing Date, to postpone such date to the next Index Business Day on which it determines that such Index Adjustment Event is not continuing; or
- 1.1.5** permanently discontinue supporting such Index or terminate the calculation of the Index Level and the publication of the Index Level of such Index, if the Index Calculation Agent determines that the foregoing measures provided in clauses 1.1.1 through 1.1.4 above produce results that are not consistent with the objectives of such Index.

1.2 If an Index Market Disruption Event occurs or is continuing on any Index Business Day that in the determination of the Index Calculation Agent, is material with respect to any Index, the Index Calculation Agent may:

- 1.2.1** defer or suspend publication of the Index Level and any other information relating to such Index until it determines that no Index Market Disruption Event is continuing;
- 1.2.2** if such Index Business Day is a Selection Date, to postpone such date to the next Index Business Day on which it determines that such Index Market Disruption Event is not continuing. As a result, the Rebalancing Date for each Index will also be postponed so that the number of Index Business Days between the Index Selection Date (as postponed) and the Rebalancing Date (as postponed) remains the same;
- 1.2.3** if such Index Business Day is a Rebalancing Date, to postpone such date to the next Index Business Day on which it determines that such Index Market Disruption Event is not continuing; or
- 1.2.4** permanently discontinue supporting such Index or terminate the calculation of the Index Level and the publication of the Index Level of such Index, if the Index Calculation Agent determines that the foregoing measures provided in clauses 1.2.1 through 1.2.3 above produce results that are not consistent with the objectives of such Index.

2. Change in Methodology

2.1 The Index Calculation Agent shall employ the methodology described herein and its application of such methodology shall be conclusive and binding. While the Index Calculation Agent currently employs the methodology described herein, no assurance can be given that market, regulatory, juridical, financial, fiscal or other circumstances will not arise that would, in its view necessitate a

modification or change of such methodology (including the information or inputs on which an Index is based) and consequently these Index Rules or termination of any Index. The Index Calculation Agent reserves the right to take the actions described in this Section 2.1.

2.2 The Index Owner assumes no obligation to implement any modification or change to the methodology set out herein as a result of any market, regulatory, juridical, financial, fiscal or other circumstances (including, but not limited to, any changes to or any suspension or termination of or any other events affecting any Index or any Index Constituents). Where the Index Owner elects to make a modification or change in the methodology, the Index Owner will make reasonable efforts to ensure that such modifications or changes will result in a methodology that is consistent with the methodology described herein.

2.3 If any modifications, changes, suspension or termination effected pursuant to Section 2.1, 2.2 above or 4 below, the Index Owner will publish such modifications or changes on the relevant Index page of the website <http://www.rod-group.com>.

3. Change of Index Calculation Agent

3.1 The Index Owner may terminate the appointment of, and replace, the Index Calculation Agent with a successor Index Calculation Agent. Following termination of the appointment of the Index Calculation Agent, the Index Owner will publish an announcement of such termination and the identity of the successor Index Calculation Agent on the relevant Index page of the website <http://www.rod-group.com> as soon as reasonably practicable.

4. Index Announcements and Adjustments

4.1 Announcements and Adjustments

The Index Owner may, at any time subject to a reasonable prior announcement published on the relevant Index page of the website <http://www.rod-group.com>, declare new Index Constituents on the Announcement Date, change with respect to an Index, the name of that Index, the place and time of the publication of the Index Level, and the frequency of the publication of the Index Level.

The index owner cannot make edits to the Index Constituents, even in the event that this change would correct an error made in the selection process, once they have been announced on the Announcement Date.

For Return on Disability US LargeCap Total Return Net USD Index and Return on Disability US LargeCap Excess Return Net USD Index, in the event that no Index Constituents are provided on the Announcement Date, the Index Constituents selection date immediately preceding the Announcement Date will be used for the following 12 months. This will occur for a maximum of 2 years when the Index will be terminated.

5. Tickers

5.1 Index Tickers

The tickers for The Return on Disability US LargeCap ETN Total Return USD Index are:

Bloomberg – RODITR Index <GO>

Reuters - .RODITR

Appendix 1 – Adjustment for Corporate Actions

The following list details the adjustments made to reflect the effect of Corporate Actions on the Index calculation.

1. Definitions

“Affected Index Constituent” means, an Index Constituent which is affected by a Corporate Action;

k means, with respect to a Corporate Action, the new adjustment factor for the Affected Index Constituent, i.e. the ratio between the new number of Shares of the Affected Index Constituent to be held in the relevant Index (adjusted to reflect the effect of the Corporate Action) and the old number of Shares held in the relevant Index immediately before the Corporate Action takes place. For the avoidance of doubt, $K=0$ means that following the Corporate Action no more Shares of the Affected Index Constituent will be held in the relevant Index. $K=1$, means that the Corporate Action does not impact the number of Shares of the Affected Index Constituent held in the relevant Index;

N_{old} means, with respect to a Corporate Action, the number of Shares of the Affected Index Constituent held in the relevant Index before any adjustment for the Corporate Action is implemented;

P_{close} means, with respect to a Corporate Action, the unadjusted price of the relevant Share on the Reference Date of the relevant Corporate Action.

“Reference Date” means, with respect to a Corporate Action the Share Trading Day immediately preceding the Ex-Date of the relevant Corporate Action;

“Share Trading Day” means each day on which the Share is traded on the Exchange;

2. Choice between cash and stock distribution

For any distributions in relation to an Affected Index Constituent, if choices are given to holders of that Affected Index Constituent the following rules are generally applied:

- Cash distribution is preferred over any distribution of security;
- Distribution in the Share currency is preferred over distribution in another currency;
- In case of security distribution, same shares are preferred over distribution of any other security;
- Options to swap existing Shares for any other security are ignored.

3. Adjustment for not specified Corporate Actions

Adjustments in relation to an Affected Index Constituent are determined on the Reference Date for each Corporate Action provided that:

- If the terms of a Corporate Action are unknown or not finalised on the Reference Date, including but not limited to cases when the final dividend distribution is unknown, the Share repurchase price is unknown or the terms of a right offering is not finalised; or
- If the Share Issuer distributes securities which are not fully tradable on the Reference Date, including but not limited to, the case of a spin off when the shares of the spun off company are not tradable on the Reference Date or a dividend in the form of a security which is not fully tradable on the Reference Date is paid out;

the Index Owner may decide:

- To remove the relevant Shares from the relevant Index in which case the adjustment outlined in Section 4.9 (Delisting and Share Removal) is applied:

$$k = 0$$

$$CF = N_{old} \times P_{close}$$

Or

- To make any other adjustments the Index Calculation Agent determines appropriate and in line with general market practice to maintain the tradability of the relevant Index.
- In the case of cash dividends for which the dividend amount is not specified, to take 80% of the dividend as estimated by a Data Source, as selected by the Index Calculation Agent

4. Adjustment formulae

All adjustments are determined on the Reference Date of each Corporate Actions and according to the formulae below.

4.1 Ordinary Cash Dividend

Dividend reinvestment on next rebalancing

The Ordinary Cash Dividend, net of tax (if a Withholding Tax Rate is applicable), is held in the relevant Index and reinvested on the next rebalancing of such Index.

$$k = 1$$

$$CF = N_{old} \times d \times (1 - tax)$$

Where:

- **d** is the cash dividend per Share as announced by the company; if the dividend is announced in a currency other than the relevant Share Currency, the dividend amount will be converted into the relevant Share Currency by applying the relevant Currency Spot Rate as of 4pm London time on the Reference Date;
- **tax** is the Withholding Tax Rate (if applicable).

4.2 Stock dividend (withholding taxes are not applied to stock dividends)

The Index Calculation Agent determines the number 'B' of additional new Shares that the shareholders would receive 'for every 'A' Share held and the new Shares are added to the existing Shares in the relevant Index. The adjustment factor will be calculated as follows:

$$k = \frac{A + B}{A}$$

4.3 Special Cash Dividend

Special Cash Dividends are defined as

- dividends D_{Spec} which are classified as "Special Dividend" on relevant Bloomberg page, and
- $D_{Spec} / P_{close} > 5\%$.

An assumption is made that the Special Cash Dividend is reinvested into new Shares of the same company and not held in cash, effective for the ex-date of the Special Cash Dividend.

$$k = 1 + \frac{D_{Spec} \times (1 - tax)}{P_{close} - [D_{Spec} \times (1 - tax)]}$$

Where:

D_{Spec} is the Special Cash Dividend per Share; **if the dividend is announced in a currency other than the relevant Share Currency, the dividend amount will be converted into the relevant Share Currency by applying the relevant Currency Spot Rate as of 4pm London time on the Reference Date;**

tax is the Withholding Tax Rate (If applicable).

4.4 Split and reverse split

The Index Calculation Agent determines the number 'B' of Shares that shareholders would hold for every 'A' shares they would hold, after the Corporate Action. The adjustment factor will be calculated as:

$$k = \frac{B}{A}$$

4.5 Rights offering

The Index Calculation Agent determines the number 'B' of additional Shares 'B' that shareholders would receive for every 'A' Shares held. The new Shares will be bought at the subscription price, financing such purchase by selling some of the share holdings. The adjustment factor will be calculated as:

$$k = \frac{(A + B) \times P_{close}}{P_{close} \times A + P_{subscription} \times B}$$

Where:

$P_{subscription}$ is the subscription price of the rights issue.

If the rights are conditional or contingent, including but not limited to "poison pill rights" when the rights can be exercised if anyone acquires more than a set amount of shares, these rights are ignored and so no adjustment is made.

4.6 Stock dividend in the form of another security

The Index Calculation Agent determines the number 'B' of new securities that shareholders would receive for every 'A' Shares held and the new securities are sold and reinvested into Shares of the distributing company. The adjustment factor will be calculated as:

$$k = \frac{P_{close} \times A}{P_{close} \times A - P_{offer} \times B}$$

Where:

P_{offer} is the close trading price of the new security on the trading day immediately preceding the "Ex-Date", converted into the original Share Currency by applying the relevant Currency Spot Rate as of 4pm London time on the Reference Date;

4.7 Return of capital and Share consolidation

This case is treated as a combination of reverse stock split and Special Cash Dividend. The adjustment factor will be calculated so as to reflect the new post-distribution and post-split price, all while keeping the weight of the position before and after the change consistent:

$$k = \frac{P_{close} \times B}{A \times [P_{close} - [D_{Spec} \times (1 - tax)]]}$$

Where:

Cr is the capital return per share announced by the company;

tax is the Withholding Tax Rate (if applicable);

The Index Calculation Agent determines the number 'B' of Shares that a shareholder would hold for every 'A' Shares held, after the corporate action.

4.8 Delisting and Share Removal

A delisting can occur when a company ceases to be traded on a major U.S. exchange. If a delisting effective date is known ahead of the event, such as in the case of a voluntary delisting or a procedural failure to meet continued listing requirements, then the company will be removed from the index at the last traded price and its value accrued to the cash flows. The adjustment factor will be calculated as:

$$k = 0$$

$$CF = N_{old} \times P_{close}$$

Where:

P_{close} is the official primary exchange closing price on the day preceding the delisting effective date

If a delisting occurs as a result of a bankruptcy or other sudden financial distress event, then the company will be removed from the index at the last trade price and its value accrued to the cash flows. In this situation, the last traded price could be a price retrieved from the OTC equity markets.

If a delisting occurs as a result of a bankruptcy or other sudden financial distress event, and, the security does not resume trading on an OTC equity market such as Pink Sheets or Bulletin Board, then the company will be removed from the index at a price of \$0.00. In this case, the adjustment factor will be calculated as:

$$k = 0$$

And there will be no change made to the cash flows, or CF.

In the case of a company being delisted due to an acquisition, the company will be removed from the index at its last traded price. The removal could occur after the suspension of trading in the acquired company, if the acquisition closes with little or no notice period. In this case, the adjustment factor will be calculated as:

$$k = 0$$

$$CF = N_{old} \times P_{close}$$

Where:

P_{close} is the official primary exchange closing price on the day preceding the effectiveness of the acquisition and subsequent delisting

4.9 Spin-off

A spin-off occurs when a company splits off sections of itself as a separate company. The Index Calculation Agent determines the number of 'B' shares of the spun-off company that a shareholder would receive for every 'A' Shares held. The spun-off shares are sold on the spun-off Share Trading Day for the spun-off shares immediately preceding the "Ex-Date" provided that:

1. If the spun-off company is tradable as of the Reference Date, then the spin-off will be treated as in 4.6 "Stock dividend in the form of another security".
2. If the Index Calculation Agent determines, that the spun-off company will be tradable on the Ex-Date, then the spun-off company will be kept in the relevant Index until the next Rebalancing Date, starting from the close of the Ex-Date and with the same number of Shares as the Affected Index Constituent.
3. If the Index Calculation Agent determines, that the spun-off company will not be tradable on the Ex-Date, the adjustment for "non specified Corporate Actions" (as set out in 3) above will apply.

Regardless of the provisions above, if the Index Calculation Agent determines, that after the spin off either the Share Issuer for the Affected Index Constituent or the spun-off company are not consistent with the rationale for the relevant Index, then the Index Calculation Agent can apply any other adjustments deems to be appropriate to maintain the integrity of such Index.

4.10 Combination stock distribution (dividend or split) and rights offering

The Index Calculation Agent determines the number of 'B' new Shares received by shareholders from the distribution and 'C' new Shares received by shareholders from the rights offering for every 'A' shares held:

4.11.1. Rights issue occurs after stock distribution

$$k = \frac{P_{close} \times (A + B) \times \left(1 + \frac{C}{A}\right)}{P_{close} \times A + P_{subscription} \times C \times \left(1 + \frac{B}{A}\right)}$$

4.11.2. Stock distribution occurs after rights issue

$$k = \frac{P_{close} \times (A + C) \times \left(1 + \frac{B}{A}\right)}{P_{close} \times A + P_{subscription} \times C}$$

4.11.3. Stock distribution and rights issue occur independently

$$k = \frac{P_{close} \times (A + B + C)}{P_{close} \times A + P_{subscription} \times C}$$

4.11 Combination of stock and cash dividend

4.12.1 Stock dividend of the same company (combined with a cash dividend)

The Index Calculation Agent determines the number 'B' of new Shares received by shareholders for every 'A' shares and an assumption is made that these new Shares are added to the existing Shares in an Index.

Dividend reinvestment on next rebalancing

The Ordinary Cash Dividend, net of tax, is kept as cash and will be reinvested on the next rebalancing of such Index.

$$k = \frac{A + B}{A}$$

$$CF = N_{old} \times d \times (1 - tax)$$

Where:

d is the dividend per Share as announced by the Share Issuer; if the dividend is announced in a currency other than the relevant Share Currency, the dividend amount will be converted into the relevant Share Currency by applying the relevant Currency Spot Rate on the Reference Date;

tax is the Withholding Tax Rate (if applicable)

4.12.2 Stock dividend in the form of another security (combined with a cash dividend)

The Index Calculation Agent determines the number 'B' of new securities received by shareholders for every 'A' Shares held and the new securities are sold and reinvested into shares of the distributing company.

Dividend reinvestment on next rebalancing

The Ordinary Cash Dividend, net of tax, is kept as cash and will be reinvested on the next rebalancing of the relevant Index.

$$k = \frac{P_{close} \times A}{P_{close} \times A - P_{offer} \times B}$$

$$CF = N_{old} \times d \times (1 - tax)$$

Where:

d is the dividend per Share as announced by the Share Issuer; if the dividend is announced in a currency other than the relevant Share Currency, the dividend amount will be converted into the relevant Share Currency by applying the relevant Currency Spot Rate on the Reference Date;

tax is the Withholding Tax Rate (if applicable)

P_{offer} is the price of the new securities on the trading day immediately preceding the "Ex-Date", converting into the Index Currency at the prevailing Currency Spot rate.

Appendix 2 – RoD Index Committee

Establishment of Index Committee

The Return on Disability Index Committee shall oversee the integrity of the rules and provide clarifactory guidance on the rules where required, although every effort is made to ensure the rules are clear and non-discretionary.

Confidentiality

Without limiting the generality of the foregoing, the minutes of the Index Committee are Confidential Information and may not be discussed with anyone outside the Index Committee without the prior written approval of the Chair.

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