



**RoD US 100 Tracking Index
Methodology
July 2014**

Table of contents

Introduction	
Introduction	3
Eligibility Criteria	
Additions – RoD US 100	4
Deletions – RoD US 100	5
Timing of Changes	6
Index Construction	
Approaches	7
Index Calculations	7
Multiple Classes of Stock	7
Index Maintenance	
Rebalancing	8
Corporate Action	8
Other Adjustment	8
Index Governance	
Index Committee	9
Index Policy	
Announcements	10
Holiday Schedule	10
Unscheduled Market Closures	10
Index Dissemination	
Calculation Agent	11
Tickers	11
Constituent Lists and Announcements	11
The Return on Disability Group Contact Information	
Index Management	12
Media Relations	12
Disclaimer	
Disclaimer	13

Introduction

The Return on Disability® Group 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 The Return on Disability Group to be the top firms in disability with respect to creation of shareholder value. The RoD US 100 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.

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 The Return on Disability Group or its designee calculates. This Index is a tracking index, intended to prove the link between corporate activity in disability and the value of a portfolio of stocks.

Eligibility Criteria

Additions – RoD US 100

Return on Disability® Ranking. As defined by a proprietary model via The Return on Disability Group, all firms in the universe (as below) are given a result of observation (a 'score' between 0 and 5) 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.

Market Capitalization. Unadjusted market capitalization of US\$ 2.0 billion or more. The market capitalization of a potential addition to an index is looked at in the context of its short- and medium-term historical trends, as well as those of its industry. These ranges are reviewed from time to time to assure consistency with market conditions.

Liquidity. Adequate liquidity and reasonable price – the ratio of annual dollar value traded on all eligible exchanges to float adjusted market capitalization should be 1.00 or greater, and the company should trade a minimum of 250,000 shares in each of the six months leading up to the evaluation date.

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

1. File 10-K annual reports and should not be considered a foreign entity by the SEC.
2. 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.
3. A corporate governance structure consistent with U.S. practice.

The final determination of domicile eligibility is made by The Return on Disability Group.

Financial Viability. Usually measured as four consecutive quarters of positive as-reported earnings. As-reported earnings are Generally Accepted Accounting Principles (GAAP) net income excluding discontinued operations and extraordinary items.

Treatment of IPOs. Initial public offerings are immediately eligible for index inclusion.

Eligible Securities. Eligible securities include all U.S. common equities listed on the NYSE (including NYSE Arca and NYSE MKT), the NASDAQ Global Select Market, the NASDAQ Select Market, and the NASDAQ Capital Market. Ineligible securities include limited partnerships, master limited partnerships, OTC bulletin board issues, closed-end funds, ETFs, ETNs, royalty trusts, tracking stocks, preferred shares, unit trusts, equity warrants, convertible bonds, investment trusts, ADRs, ADSs and MLP IT units. Real estate investment trusts (excluding mortgage REITs) and business development companies (BDCs) are eligible for inclusion.

Deletions – RoD US 100

- Companies that no longer rank in the top 100 firms as designated by their respective Return on Disability® Result.

Companies that are currently constituents of the RoD US 100 whose Return on Disability® Result fails below the top 100 rank will be removed at the next annual reconstitution.

- Companies that are involved in mergers, acquisitions, or significant restructuring such that they no longer meet inclusion criteria

Companies delisted as a result of merger, acquisition or other corporate action are removed at a time announced by The Return on Disability Group, normally at the close of the last day of trading or expiration of a tender offer. Constituents that are halted from trading may be kept in the index until trading resumes, at the discretion of The Return on Disability Group. If a company is moved to the pink sheets or the bulletin board, the stock will be removed. Index changes are announced with one to five days' advance notice on The Return on Disability Group website.

- Companies that substantially violate one or more of the addition criteria

The Return on Disability Group believes turnover in index membership should be avoided when possible, for reason unrelated to disability. At times a company may appear to temporarily violate one or more of the addition criteria. However, the addition criteria are for addition to an index, not for continued membership. As a result, an index constituent that appears to violate criteria for addition to that index will not be deleted unless ongoing conditions warrant an index change. When a company is removed from an index, The Return on Disability Group will explain the basis for the removal.

Timing of Changes

Changes to the U.S. indices occur according to the following schedule:

Last trading day – First Quarter – Share Rebalance

The RoD US 100 shall rebalance after the market close on the last trading day of the quarter-ending month with weights set to $1/N$ for each company in the index where N equals the number of components in the index at rebalance. The index shall rebalance to equal weight based on the official closing price quoted on the constituent's primary exchange.

Last trading day – Second Quarter – Share Rebalance

Last trading day – Third Quarter – Share Rebalance

Last trading day – Fourth Quarter – Annual Reconstitution

Based on updated rankings of the Return on Disability® Result, the top 100 ranked firms that meet all of the addition criteria constitute the members of the new RoD US 100 Index. These Results are updated by The Return on Disability Group in line with the RoD US 100 reconstitution schedule. The additions and deletions shall be announced on The Return on Disability Group website ten (10) trading days prior to the reconstitution. The index shall rebalance to equal weight based on the official closing price quoted on the constituent's primary exchange.

Deletions triggered by corporate action shall occur on an as-needed basis.

Index Construction

Approaches

The Return on Disability Group' Indices are designed to be liquid, so as to support investment products such as index mutual funds, exchange traded funds and other financial products. This tracking index is not intended to be attached to an investable product. Any investable product requires a detailed prospectus, outlining disclosures and investment risks not included in this document.

Index Calculations

On any given day, the index value is the quotient of the equally weighted stock position of index's constituents and its divisor. Continuity in index values is maintained by adjusting the divisor for all changes in the constituents' share capital after the base date. The divisor's time series is, in effect, a chronological summary of all changes affecting the equal weight of the index. The divisor is adjusted such that the index value at an instant just prior to a change in base capital equals the index value at an instant immediately following that change.

Multiple Classes of Stock

Some companies have more than one class of common stock outstanding. In the RoD US 100 Index, each company is represented only once. The stock price is based on one class, usually the most liquid class.

Index Maintenance

Rebalancing

The RoD US 100 is rebalanced quarterly to maintain equal weighting and is reconstituted annually to account for new corporate activity in disability within the universe of large capitalization US public companies. The annual reconstitution coincides with the annual research cycle of the Return on Disability® Results. The reconstituted index reflects research performed during the prior twelve months by The Return on Disability Group.

Constituent changes are typically announced 10 days before they are scheduled to be implemented. Announcements are available to the public via the Web site, www.rod-group.com, before or at the same time they are available to clients or the affected companies.

Corporate Actions

Corporate actions (such as stock splits, stock dividends, spin-offs and rights offerings) are applied after the close of trading on the day prior to the ex-date. Share changes resulting from exchange offers are made on the ex-date.

Other Adjustments

In cases where there is no achievable market price for a stock being deleted, it can be removed at a zero or minimal price at the discretion, in recognition of the constraints faced by investors in trading bankrupt or suspended stocks.

In the event that a constituent is deleted prior to a annual reconstitution, its replacement will not be added until the next reconstitution. For clarity sake, this means that, at any given time, the index may have less than 100 constituents.

Index Governance

Index Committee

The RoD US 100 is maintained by The Return on Disability Group Index Committee. Members of the committee are full-time professional members of The Return on Disability Group' staff and may include external experts in investment matters. The committee meets annually. At each meeting, the Index Committee reviews pending corporate actions that may affect index constituents, companies that are being considered as candidates for addition to an index, and any significant market events. In addition, the Index Committee may revise index policy covering rules for selecting companies, treatment of dividends or other matters.

The Return on Disability Group considers information about changes to its indices and related matters to be potentially market moving and material. Therefore, all Index Committee matters are confidential.

Index Policy

Announcements

Announcements of additions and deletions for the RoD US 100 are made at 5:15 PM Eastern Time. Press releases are posted on the Web site, www.rod-group.com.

Index methodology is constantly under review for best practices, and any changes are announced with sufficient time for market adjustment via the Web site.

Holiday Schedule

The RoD U.S. 100 Index is calculated when the U.S. equity markets are open.

Unscheduled Market Closures

In situations where an exchange is forced to close early due to unforeseen events, such as computer or electric power failures, weather conditions or other events, The Return on Disability Group or its designated calculation agent will calculate the closing price of the indices based on (1) the closing prices published by the exchange, or (2) if no closing price is available, the last regular trade reported for each stock before the exchange closed. In all cases, the prices will be from the primary exchange for each stock in the index. If an exchange fails to open due to unforeseen circumstances, the index will use the prior day's closing prices. If all exchanges fail to open, The Return on Disability Group or its designated calculation agent may determine not to publish the index for that day.

Index Dissemination

Calculation Agent

Bloomberg LP is the exclusive calculation agent of the RoD US 100 index.

Ticker

The Bloomberg ticker for the RoD US 100 index is:

FQARODUS Index DES<go>

Constituent Lists and Announcements

The Return on Disability Group' Web site provides a current list of constituents and an archive of recent index announcements and press releases.

Contact Information

Index Management

Rich Donovan – Chief Executive Officer & Chair of the Index Committee
rich@rod-group.com 1-718-395-7877

General Disclaimer

This document does not constitute an offer of services in jurisdictions where The Return on Disability Group LLC and/or its affiliates do not have the necessary or appropriate licenses. All information provided by The Return on Disability Group LLC and its affiliates is impersonal and not tailored to the needs of any person, or entity or group of persons and/or entities. The Return on Disability Group LLC and its affiliates intend to receive compensation in connection with licensing their indices to third parties.

It is not possible to invest directly in an index. Exposure to an asset class represented by an index is available through investable instruments based on that index. The Return on Disability Group LLC and its affiliates may sponsor, endorse, sell, promote or manage any investment fund or other vehicle, including any fund or other vehicle offered by a third party, that seeks to provide an investment return based on the returns of any Return on Disability index. There is no assurance that investment products based on the index will accurately track index performance or provide positive investment returns. The Return on Disability Group LLC is not an investment advisor, and The Return on Disability Group LLC and its affiliates make no representation regarding the advisability of investing in any such investment fund or other vehicle. A decision to invest in any such investment fund or other vehicle should not be made in reliance on any of the statements set forth in this document. Prospective investors are advised to make an investment in any such fund or other vehicle only after carefully considering the risks associated with investing in such fund or other vehicle, as detailed in an offering memorandum or similar document that is prepared by or on behalf of the issuer of such fund or other vehicle. Inclusion of a security within an index is not a recommendation by The Return on Disability Group LLC or its affiliates to buy, sell, or hold such security, nor is it considered to be investment advice.

The Return on Disability Group LLC and its affiliates do not guarantee the accuracy and/or completeness of any Return on Disability index, any data included therein, or any data from which it is based, and neither The Return on Disability Group LLC nor its affiliates shall have any liability for any errors, omissions, or interruptions therein. The Return on Disability Group LLC and its affiliates make no warranties, express or implied, as to results to be obtained from use of information provided by The Return on Disability Group LLC or its affiliates, and The Return on Disability Group LLC and its affiliates expressly disclaim all warranties of suitability with respect thereto. While The Return on Disability Group LLC and its affiliates have obtained information believed to be reliable, The Return on Disability Group LLC and its affiliates shall not be liable for any claims or losses of any nature in connection with information contained in this document, including, but not limited to, lost profits or punitive or consequential damages, even if it or they are advised of the possibility of same. The Return on Disability Group LLC and its affiliates keep certain activities of their respective business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of The Return on Disability Group LLC and/or its affiliates may have information that is not available to other business units of The Return on Disability Group LLC and/or its affiliates. The Return on Disability Group LLC and its affiliates have established policies and procedures to maintain the confidentiality of non-public information received during each analytic process. The Return on Disability Group LLC and its affiliates provide or may in the future provide a wide range of services to, or relating to, many organizations, including issuers of securities, investment advisers, broker-dealers, investment banks, other financial institutions and financial intermediaries, and accordingly receive or may in the future receive fees or other economic benefits from those organizations, including organizations whose securities or services they may recommend, rate, include in model portfolios, evaluate or otherwise address.

Return on Disability is a registered trademark of Integrated Process Solution LLC exclusively licensed to The Return on Disability Group LLC.

Copyright © 2014 by The Return on Disability Group LLC. All rights reserved. Redistribution, reproduction and/or photocopying in whole or in part is prohibited without written permission.

The Bloomberg Terminal and its associated tickers was developed by and is the exclusive property and a trademark of Bloomberg LP.