## S&P Dow Jones Indices

A Division of S&P Global

# S&P/BMV IPC VIX Index *Methodology*

## **Table of Contents**

	1
	2
ctive	2
	2
Documents	2
on	2
ndex Construction	
es	3
from Near-Term and Next-Term Options	3
Time to Maturity	4
ng Risk Free Rates	4
dex Level	5
ection Methodology	5
rmula to Calculate Implied Volatilities	6
tween Option Contract Months	7
of Calculation and Additional Index Return Series	7
Index Governance	
mittee	8
	9
nents	9
hedule	9
ng	9
d Exchange Closures	9
formation	9
Index Dissemination	
	10
	10
	10
	11
osures	11
	12
ce Disclosure/Back-Tested Data	12
Property Notices/Disclaimer	13
	g Documents ion  as from Near-Term and Next-Term Options g Time to Maturity ng Risk Free Rates dex Level ection Methodology armula to Calculate Implied Volatilities tween Option Contract Months of Calculation and Additional Index Return Series  mittee  ments shedule ng d Exchange Closures formation  psures  ce Disclosure/Back-Tested Data I Property Notices/Disclaimer

## Introduction

#### **Index Objective**

The S&P/BMV IPC VIX Index measures the implied volatility of the S&P/BMV IPC Futures over the next 90 days.

#### **Highlights**

The index uses settlement prices for S&P/BMV IPC Index Futures put and call options to calculate a weighted average of the implied volatility of the options. The S&P/BMV IPC VIX Index is maintained by S&P Dow Jones Indices in agreement with the Bolsa Mexicana de Valores (BMV).

#### **Supporting Documents**

This methodology is meant to be read in conjunction with supporting documents providing greater detail with respect to the policies, procedures and calculations described herein. References throughout the methodology direct the reader to the relevant supporting document for further information on a specific topic. The list of the main supplemental documents for this methodology and the hyperlinks to those documents is as follows:

Supporting Document	URL
S&P Dow Jones Indices' Options Indices Policies & Practices Methodology	Options Indices Policies & Practices Methodology
S&P Dow Jones Indices' Index Mathematics Methodology	Index Mathematics Methodology

This methodology was created by S&P Dow Jones Indices in agreement with the Bolsa Mexicana de Valores (BMV) to achieve the aforementioned objective of measuring the underlying interest of each index governed by this methodology document. Any changes to or deviations from this methodology are made in the sole judgment and discretion of S&P Dow Jones Indices and the BMV so that the index continues to achieve its objective.

BMV is a trademark of Bolsa Mexicana de Valores, S.A.B. de C.V. and has been licensed for use by S&P Dow Jones Indices.

Cboe® and VIX® are registered trademarks of Cboe Exchange, Inc. and have been licensed for use by S&P Dow Jones Indices.

#### Collaboration

The S&P/BMV IPC VIX Index is maintained by S&P Dow Jones Indices in agreement with the Bolsa Mexicana de Valores (BMV).

Pursuant to an Index Operation and License Agreement dated May 2015 (the "Agreement") between S&P Dow Jones Indices LLC ("S&P DJI") and Bolsa Mexicana de Valores, S.A.B. DE C.V. ("BMV"), as amended, S&P DJI and BMV have agreed to jointly publish and co-brand a family of indices (the "Indices"). The Indices will be co-branded with the S&P/BMV naming convention on June 5, 2017 in conjunction with S&P Dow Jones Indices' assumption of index calculation and maintenance. Prior to June 5, 2017, the Indices were calculated and maintained by BMV.

## Index Construction

#### **Approaches**

The index is derived from the near-term and next-term options on the S&P/BMV IPC Index Futures. To minimize pricing anomalies from the heavy trading on expiring options during the last few trading days, options roll to the next term and third term when the near-term options have 10 calendar days to expire. The TIIE rate, TIIE 28-day rate, TIIE 91-day rate and TIIE 182-day rate are used to interpolate the risk free rates of each maturity. The index is calculated and published daily.

#### **Derive VIX from Near-Term and Next-Term Options**

The index generally uses put and call options in the two nearest-term expiration months in order to bracket a 90-day calendar period.

However, when the near-term options have less than 10 calendar days to expire, the index rolls to the second and third contract months in order to minimize pricing anomalies that might occur close to expiration.

For each maturity, put and call options are used to calculate the implied volatility. The detailed calculation is described in the next section.

The near-term volatility  $\sigma_1$  and the next term volatility  $\sigma_2$  are interpolated to arrive at a single value  $\sigma$  with a constant maturity of 90 days to expiration. The index is derived by taking  $\sigma$  (the square root of  $\sigma^2$ ) and multiplying by 100.

$$VIX = \sigma * 100$$

$$\sigma^{2} = \frac{N_{y}}{N_{m}} \left\{ T_{I} \sigma_{I}^{2} \left[ \frac{N_{T_{2}} - N_{m}}{N_{T_{2}} - N_{T_{I}}} \right] + T_{2} \sigma_{2}^{2} \left[ \frac{N_{m} - N_{T_{I}}}{N_{T_{2}} - N_{T_{I}}} \right] \right\}$$
(1)

where:

 $\sigma$  = 90-day implied volatility

 $\sigma_1$  = Near-term volatility derived from the near-term options (see formula 5)

 $\sigma_2$  = Next-term volatility derived from the next term options (see formula 5)

 $N_y$  = Number of days in one year

 $N_m$  = Number of days in three months = 90

 $T_1$  = Time to expiration (in years) of the near-term options

 $T_2$  = Time to expiration (in years) of the next-term options

 $N_{T1}$  = Number of days between the current day and the expiration date of the near-term

options

N<sub>72</sub> = Number of days between the current day and the expiration date of the next-term options

#### **Calculating Time to Maturity**

The time to maturity (7) is measured in years. The calculation consists of three parts:

N<sub>1</sub> = Fractional number of days remaining from the calculation time until midnight of the current day

 $N_2$  = Number of days between the current day and the settlement day

N₃ = Fractional number of days from midnight of the day prior to expiry to the settlement time on the expiry date

$$N_{1} = \frac{\text{minutes remaining until midnight of the current day}}{24*60}$$

$$N_{3} = \frac{\text{minutes from midnight to settlement time on expiry}}{24*60}$$

$$N_{T} = N_{1} + N_{2} + N_{3}$$

$$T = \frac{N_{T}}{N}$$
(2)

where:

 $N_y$  = Number of days in one year

 $N_T$  = Number of days until option expiration

Calendar days are used in all-the-day count calculations.

#### **Interpolating Risk Free Rates**

The TIIE rate ( $R_{0n}$ ), TIIE 28-day rate ( $R_{1m}$ ), TIIE 91-day rate ( $R_{3m}$ ) and TIIE 182-day rate ( $R_{6m}$ ) are used to interpolate the risk free rates used in the near-term ( $R_1$ ) and next-term ( $R_2$ ).

$$R_{1} = \frac{N_{y}}{N_{T_{1}}} \left\{ T_{on} R_{on} \left[ \frac{N_{1m} - N_{T_{1}}}{N_{1m} - N_{on}} \right] + T_{1m} R_{1m} \left[ \frac{N_{T_{1}} - N_{on}}{N_{1m} - N_{on}} \right] \right\}$$

$$R_{2} = \frac{N_{y}}{N_{T_{2}}} \left\{ T_{3m} R_{3m} \left[ \frac{N_{6m} - N_{T_{2}}}{N_{6m} - N_{3m}} \right] + T_{6m} R_{6m} \left[ \frac{N_{T_{2}} - N_{3m}}{N_{6m} - N_{3m}} \right] \right\}$$
(3)

where:

 $R_1$  = Near-term risk free rate

 $R_2$  = Next-term risk free rate

 $N_{on}$  = Number of days remaining until the midnight of the next business day

 $N_{1m}$  = 28 days, as used in the 28-day TIIE rate interpolation

 $N_{3m}$  = 91 days, as used in the 91-day TIIE rate interpolation

 $N_{6m}$  = 182 days, as used in the 182-day TIIE rate interpolation

 $N_{T1}$  = Number of days between the current day and the expiration date of the near-term

options

 $N_{T2}$  = Number of days between the current day and the expiration date of the next-term

options

 $N_y$  = Number of days in one year

$$T_{on} = \frac{N_{on}}{N_{y}}$$

$$T_{1m} = \frac{N_{1m}}{N_{y}}$$

$$T_{3m} = \frac{N_{3m}}{N_{y}}$$

$$T_{6m} = \frac{N_{6m}}{N_{y}}$$

$$(4)$$

Note that the interpolation works when the near-term and next-term expirations are bracketed by the overnight-28 day and the 91-182-day maturities of interest rates, respectively. When the option expirations fall outside of the corresponding interest rate expirations, the correct interest rate must be selected. For example, if the near-term expiration is between 28 days and 91 days, the 28-day and 91-day TIIE rates are used to interpolate the near-term risk free rate,  $R_1$ ; if the next-term expiration is beyond 182 days, the 91-day and 182-day TIIE rates are used to interpolate the next-term risk free rate,  $R_2$ .

#### **Forward Index Level**

For both near-term and next-term, the formula used to calculate the forward index level is as follows:

$$F = K + e^{RT} * (C_K - P_K) \tag{5}$$

where:

F = Forward index level

K = The strike price at which the absolute difference between the mid-price of the call and the put options is the smallest

T = Time to expiration (see formula 2)

R = Risk-free interest rate to expiration (see formula 3)

 $C_K$ = Mid price of calls at strike K

 $P_K$  = Mid price of puts at strike K

#### **Option Selection Methodology**

To select the options in the volatility calculation for both near-term and next-term.

- Sort all the options in ascending order by strike prices.
- Determine at-the-money strike Ko. It is the strike nearest to the forward index level F.
- Both put and call options at strike K₀are selected.
- Out-of-money call options with strike prices higher than K₀are selected.

Start with call option with strike price immediately higher than  $\mathcal{K}_0$  and move to successively higher strike prices ( $\mathcal{K}$ ). After encountering two consecutive calls with bid price of zero, no calls with higher strikes are considered.

Out-of-money put options with strike prices lower than  $K_0$  are selected. Start with put option with strike price immediately lower than  $K_0$  and move to successively lower strike prices (K). After encountering two consecutive puts with bid price of zero, no puts with lower strikes are considered.

Options which are not good quotes will be excluded. A good quote is a quote with a bid price and an ask price available:

where:

0 < bid price ≤ ask price (for all options)</li>

and

- bid/ask price of selected call options ≤ bid/ask price of the call option at Ko
   and
- bid/ask price of selected put options ≤ bid/ask price of the put option at Ko.

#### **General Formula to Calculate Implied Volatilities**

The index uses the settlement prices of options to calculate the implied volatilities.

For the near-term and the next term, respectively, implied volatilities are calculated using both puts and calls. The general formula is:

$$\sigma^{2} = \frac{2}{T} \sum_{i} \frac{\Delta K_{i}}{K_{i}^{2}} e^{RT} Q(K_{i}) - \frac{1}{T} \left[ \frac{F}{K_{0}} - 1 \right]^{2}$$
 (6)

where:

 $\sigma$  = Implied volatility

T = Time to expiration (see formula 2)

F = Forward index level (see formula 5)

 $K_i$  = Strike price of the  $i^{th}$  out-of-the-money option

 $\Delta K_i$  = Interval between strike prices (see formula 7)

 $K_0$  = At-the-money strike

R = Risk-free interest rate to expiration (see formula 3)

 $Q(K_i)$  = Settlement price of each option with strike  $K_i$ 

The index uses the S&P/BMV IPC Index futures price as the proxy for forward index level F. Define  $K_0$  as the strike that is closest to F.

The index uses both puts and calls in the volatility calculation:

- Select call options that have strike prices greater than  $K_0$  and a non-zero settlement price.
- Select put options that have strike prices less than K₀ and a non-zero settlement price.
- Select both the put and call at strike  $K_0$  and a non-zero settlement price. Use the average of put and call settlement prices as  $Q(K_0)$  in the calculation.

Generally,  $\Delta K_i$  is half the distance between the strike on either side of  $K_i$  and is calculated as:

$$\Delta K_i = \frac{K_{i+1} - K_{i-1}}{2} \tag{7}$$

At the upper and lower edges of any given strip of options,  $\Delta K_i$  is simply the difference between  $K_i$  and the adjacent strike price.

#### **Rolling Between Option Contract Months**

In calculating the index, when the near-term options have 10 days to expire, the index rolls to the second and third contract months.

#### **Currency of Calculation and Additional Index Return Series**

In addition to the indices detailed in this methodology, additional return series versions of the indices may be available, including, but not limited to the following: currency, currency hedged, decrement, fair value, inverse, leveraged, and risk control versions. For a list of available indices, please refer to the <a href="Maintenance-S&P DJI">S&P DJI</a> Methodology & Regulatory Status Database.

For information on the index calculation, please refer to S&P Dow Jones Indices' Index Mathematics Methodology.

For the inputs necessary to calculate certain types of indices, including decrement, dynamic hedged, fair value, and risk control indices, please refer to the Parameters documents available at <a href="https://www.spglobal.com/spdji/">www.spglobal.com/spdji/</a>.

## Index Governance

#### **Index Committee**

The S&P/BMV Index Committee maintains the index. The Index Committee is composed of full-time employees of S&P Dow Jones Indices and the BMV. The Index Committee meets regularly. At each meeting, the Index Committee may review pending corporate actions that may affect index constituents, statistics comparing the composition of the indices to the market, 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, share counts or other matters.

S&P Dow Jones Indices considers information about changes to its indices and related matters to be potentially market moving and material. Therefore, all Index Committee discussions are confidential and based on all publicly available information.

S&P Dow Jones Indices' Index Committees reserve the right to make exceptions when applying the methodology if the need arises. In any scenario where the treatment differs from the general rules stated in this document or supplemental documents, clients will receive sufficient notice, whenever possible.

In addition to the daily governance of indices and maintenance of index methodologies, at least once within any 12-month period, the Index Committee reviews the methodology to ensure the indices continue to achieve the stated objectives, and that the data and methodology remain effective. In certain instances, S&P Dow Jones Indices may publish a consultation inviting comments from external parties.

For information on Quality Assurance and Internal Reviews of Methodology, please refer to S&P Dow Jones Indices' Options Indices Policies & Practices Methodology.

## **Index Policy**

#### **Announcements**

Announcements of the daily index values are made after the close of each business day.

#### **Holiday Schedule**

The index is calculated daily when BMV is open.

A complete holiday schedule for the year is available at www.spglobal.com/spdji/.

#### Rebalancing

The Index Committee may change the date of a given rebalancing for reasons including market holidays occurring on or around the scheduled rebalancing date. Any such change will be announced with proper advance notice where possible.

#### **Unexpected Exchange Closures**

For information on Unexpected Exchange Closures, please refer to S&P Dow Jones Indices' Options Indices Policies & Practices Methodology.

#### **Contact Information**

For questions regarding an index, please contact: index services@spglobal.com.

## **Index Dissemination**

Index levels are available through S&P Dow Jones Indices' Web site at <a href="www.spglobal.com/spdji/">www.spglobal.com/spdji/</a>, major quote vendors, numerous investment-oriented Web sites, and various print and electronic media.

#### **Tickers**

The table below lists headline indices covered by this document. All versions of the below indices that may exist are also covered by this document. Please refer to the <u>S&P DJI Methodology & Regulatory</u> <u>Status Database</u> for a complete list of indices covered by this document.

Index	Bloomberg	RIC
S&P/BMV IPC VIX	SPBMVVIX	.SPBMVVIX

#### **Index Data**

Daily index level data are available via subscription.

For product information, please contact S&P Dow Jones Indices, <a href="www.spglobal.com/spdii/en/contact-us">www.spglobal.com/spdii/en/contact-us</a>.

#### Web site

For further information, please refer to S&P Dow Jones Indices' Web site at www.spqlobal.com/spdji/.

## **Appendix**

#### **ESG Disclosures**

EXPLANATION OF HOW ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) FACTORS ARE REFLECTED IN THE KEY ELEMENTS OF THE BENCHMARK METHODOLOGY <sup>1</sup>			
1.	Name of the benchmark administrator.	S&P Dow Jones Indices LLC.	
2.	Underlying asset class of the ESG benchmark. <sup>2</sup>	N/A	
3.	Name of the S&P Dow Jones Indices benchmark or family of benchmarks.	S&P DJI Options Indices Benchmark Statement	
4.	Do any of the indices maintained by this methodology take into account ESG factors?	No	
Аp	pendix latest update:	January 2021	
Ap	pendix first publication:	January 2021	

\_

<sup>&</sup>lt;sup>1</sup> The information contained in this Appendix is intended to meet the requirements of the European Union Commission Delegated Regulation (EU) 2020/1817 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the minimum content of the explanation of how environmental, social and governance factors are reflected in the benchmark methodology and the retained EU law in the UK [The Benchmarks (amendment and Transitional Provision) (EU Exit) Regulations 20191.

<sup>&</sup>lt;sup>2</sup> The 'underlying assets' are defined in European Union Commission Delegated Regulation (EU) 2020/1816 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published.

## Disclaimer

#### Performance Disclosure/Back-Tested Data

Where applicable, S&P Dow Jones Indices and its index-related affiliates ("S&P DJI") defines various dates to assist our clients in providing transparency. The First Value Date is the first day for which there is a calculated value (either live or back-tested) for a given index. The Base Date is the date at which the index is set to a fixed value for calculation purposes. The Launch Date designates the date when the values of an index are first considered live: index values provided for any date or time period prior to the index's Launch Date are considered back-tested. S&P DJI defines the Launch Date as the date by which the values of an index are known to have been released to the public, for example via the company's public website or its data feed to external parties. For Dow Jones-branded indices introduced prior to May 31, 2013, the Launch Date (which prior to May 31, 2013, was termed "Date of introduction") is set at a date upon which no further changes were permitted to be made to the index methodology, but that may have been prior to the Index's public release date.

Please refer to the methodology for the Index for more details about the index, including the manner in which it is rebalanced, the timing of such rebalancing, criteria for additions and deletions, as well as all index calculations.

Information presented prior to an index's launch date is hypothetical back-tested performance, not actual performance, and is based on the index methodology in effect on the launch date. However, when creating back-tested history for periods of market anomalies or other periods that do not reflect the general current market environment, index methodology rules may be relaxed to capture a large enough universe of securities to simulate the target market the index is designed to measure or strategy the index is designed to capture. For example, market capitalization and liquidity thresholds may be reduced. In addition, forks have not been factored into the back-test data with respect to the S&P Cryptocurrency Indices. For the S&P Cryptocurrency Top 5 & 10 Equal Weight Indices, the custody element of the methodology was not considered; the back-test history is based on the index constituents that meet the custody element as of the Launch Date. Back-tested performance reflects application of an index methodology and selection of index constituents with the benefit of hindsight and knowledge of factors that may have positively affected its performance, cannot account for all financial risk that may affect results and may be considered to reflect survivor/look ahead bias. Actual returns may differ significantly from, and be lower than, back-tested returns. Past performance is not an indication or guarantee of future results.

Typically, when S&P DJI creates back-tested index data, S&P DJI uses actual historical constituent-level data (e.g., historical price, market capitalization, and corporate action data) in its calculations. As ESG investing is still in early stages of development, certain datapoints used to calculate certain ESG indices may not be available for the entire desired period of back-tested history. The same data availability issue could be true for other indices as well. In cases when actual data is not available for all relevant historical periods, S&P DJI may employ a process of using "Backward Data Assumption" (or pulling back) of ESG data for the calculation of back-tested historical performance. "Backward Data Assumption" is a process that applies the earliest actual live data point available for an index constituent company to all prior historical instances in the index performance. For example, Backward Data Assumption inherently assumes that companies currently not involved in a specific business activity (also known as "product involvement") were never involved historically and similarly also assumes that companies currently involved in a specific business activity were involved historically too. The Backward Data Assumption allows the hypothetical back-test to be extended over more historical years than would be feasible using only actual data. For more information on "Backward Data Assumption" please refer to the FAQ. The methodology and factsheets of any index that employs backward assumption in the back-tested history will explicitly state so. The methodology will include an Appendix with a table setting forth the specific

data points and relevant time period for which backward projected data was used. Index returns shown do not represent the results of actual trading of investable assets/securities. S&P DJI maintains the index and calculates the index levels and performance shown or discussed but does not manage any assets.

Index returns do not reflect payment of any sales charges or fees an investor may pay to purchase the securities underlying the Index or investment funds that are intended to track the performance of the Index. The imposition of these fees and charges would cause actual and back-tested performance of the securities/fund to be lower than the Index performance shown. As a simple example, if an index returned 10% on a US \$100,000 investment for a 12-month period (or US \$10,000) and an actual asset-based fee of 1.5% was imposed at the end of the period on the investment plus accrued interest (or US \$1,650), the net return would be 8.35% (or US \$8,350) for the year. Over a three-year period, an annual 1.5% fee taken at year end with an assumed 10% return per year would result in a cumulative gross return of 33.10%, a total fee of US \$5,375, and a cumulative net return of 27.2% (or US \$27,200).

#### Intellectual Property Notices/Disclaimer

© 2023 S&P Dow Jones Indices. All rights reserved. S&P, S&P 500, SPX, SPY, The 500, US500, US 30, S&P 100, S&P COMPOSITE 1500, S&P 400, S&P MIDCAP 400, S&P 600, S&P SMALLCAP 600, S&P GIVI, GLOBAL TITANS, DIVIDEND ARISTOCRATS, Select Sector, S&P MAESTRO, S&P PRISM, S&P STRIDE, GICS, SPIVA, SPDR, INDEXOLOGY, iTraxx, iBoxx, ABX, ADBI, CDX, CMBX, MBX, MCDX, PRIMEX, HHPI, and SOVX are registered trademarks of S&P Global, Inc. ("S&P Global") or its affiliates. DOW JONES, DJIA, THE DOW and DOW JONES INDUSTRIAL AVERAGE are trademarks of Dow Jones Trademark Holdings LLC ("Dow Jones"). These trademarks together with others have been licensed to S&P Dow Jones Indices LLC. Redistribution or reproduction in whole or in part are prohibited without written permission of S&P Dow Jones Indices LLC. This document does not constitute an offer of services in jurisdictions where S&P DJI does not have the necessary licenses. Except for certain custom index calculation services, all information provided by S&P DJI is impersonal and not tailored to the needs of any person, entity, or group of persons. S&P DJI receives compensation in connection with licensing its indices to third parties and providing custom calculation services. Past performance of an index is not an indication or guarantee of future results.

It is not possible to invest directly in an index. Exposure to an asset class represented by an index may be available through investable instruments based on that index. S&P DJI does not sponsor, endorse, sell, promote or manage any investment fund or other investment vehicle that is offered by third parties and that seeks to provide an investment return based on the performance of any index. S&P DJI makes no assurance that investment products based on the index will accurately track index performance or provide positive investment returns. S&P DJI is not an investment advisor, commodity trading advisor, fiduciary, "promoter" (as defined in the Investment Company Act of 1940, as amended) or "expert" as enumerated within 15 U.S.C. § 77k(a), and S&P DJI makes no representation regarding the advisability of investing in any such investment fund or other investment vehicle. A decision to invest in any such investment fund or other investment vehicle. A decision to invest in any such investment fund or other investment vehicle should not be made in reliance on any of the statements set forth in this document. S&P DJI is not a tax advisor. Inclusion of a security, commodity, crypto currency, or other asset within an index is not a recommendation by S&P DJI to buy, sell, or hold such security, commodity, crypto currency, or other asset, nor is it considered to be investment or trading advice.

These materials have been prepared solely for informational purposes based upon information generally available to the public and from sources believed to be reliable. No content contained in these materials (including index data, ratings, credit-related analyses and data, research, valuations, model, software or other application or output therefrom) or any part thereof ("Content") may be modified, reverse engineered, reproduced, or distributed in any form or by any means, or stored in a database or retrieval system, without the prior written permission of S&P DJI. The Content shall not be used for any unlawful or unauthorized purposes. S&P DJI and its third-party data providers and licensors (collectively "S&P Dow Jones Indices Parties") do not guarantee the accuracy, completeness, timeliness, or availability of the Content. S&P Dow Jones Indices Parties are not responsible for any errors or omissions, regardless of the cause, for the results obtained from the use of the Content. THE CONTENT IS PROVIDED ON AN "AS IS" "WHERE IS" BASIS. S&P DOW JONES INDICES PARTIES DISCLAIMS ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF

MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE OR HARDWARE CONFIGURATION. In no event shall S&P Dow Jones Indices Parties be liable to any party for any direct, incidental, exemplary, compensatory, punitive, special, or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related information and other analyses, including ratings, research and valuations are generally provided by licensors and/or affiliates of S&P Dow Jones Indices, including but not limited to S&P Global's other divisions such as S&P Global Market Intelligence. Any credit-related information and other related analyses and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. Any opinion, analyses and rating acknowledgement decisions are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P Dow Jones Indices does not assume any obligation to update the Content following publication in any form or format. The Content should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. S&P DJI does not act as a fiduciary or an investment advisor. While S&P DJI has obtained information from sources it believes to be reliable, S&P DJI does not perform an audit or undertake independent verification of any information it receives. S&P DJI reserves the right to vary or discontinue any index at any time for regulatory or other reasons. Various factors, including external factors beyond S&P DJI's control might necessitate material changes to indices.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P Global Ratings reserves the right to assign, withdraw or suspend such acknowledgement at any time and in its sole discretion. S&P Dow Jones Indices, including S&P Global Ratings, disclaim any duty whatsoever arising out of the assignment, withdrawal, or suspension of an acknowledgement as well as any liability for any damage alleged to have been suffered on account thereof. Affiliates of S&P Dow Jones Indices LLC, including S&P Global Ratings, may receive compensation for its ratings and certain credit-related analyses, normally from issuers or underwriters of securities or from obligors. Such affiliates of S&P Dow Jones Indices LLC, including S&P Global Ratings, reserve the right to disseminate its opinions and analyses. Public ratings and analyses from S&P Global Ratings are made available on its Web sites, <a href="www.standardandpoors.com">www.standardandpoors.com</a> (free of charge), and <a href="www.standardandpoors.com">www.ratingsdirect.com</a> and <a href="www.standardandpoors.com">www.standardandpoors.com</a> (subscription), and may be distributors. Additional information about our ratings fees is available at <a href="www.standardandpoors.com/usratingsfees">www.standardandpoors.com/usratingsfees</a>.

S&P Global keeps certain activities of its various divisions and business units separate from each other to preserve the independence and objectivity of their respective activities. As a result, certain divisions and business units of S&P Global may have information that is not available to other business units. S&P Global has established policies and procedures to maintain the confidentiality of certain nonpublic information received in connection with each analytical process.

In addition, S&P Dow Jones Indices provides 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 may 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.

Some indices use the Global Industry Classification Standard (GICS®), which was developed by, and is the exclusive property and a trademark of, S&P Global and MSCI. Neither MSCI, S&P DJI nor any other party involved in making or compiling any GICS classifications makes any express or implied warranties or representations with respect to such standard or classification (or the results to be obtained by the use thereof), and all such parties hereby expressly disclaim all warranties of originality, accuracy,

completeness, merchantability, or fitness for a particular purpose with respect to any of such standard or classification. Without limiting any of the foregoing, in no event shall MSCI, S&P DJI, any of their affiliates or any third party involved in making or compiling any GICS classifications have any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

S&P Dow Jones Indices products are governed by the terms and conditions of the agreements under which they may be provided. A license is required from S&P Dow Jones Indices to display, create derivative works of and/or distribute any product or service that uses, is based upon and/or refers to any S&P Dow Jones Indices and/or index data.