

Halifax House Price Index (HHPI) 2019

***Index Manual for HHPI
model introduced in 2019***

Table of Contents

1) Significant Index Administration Events	3
2) HHPI (2019) Overview	3
3) Index Methodology	4
3.1) Index Calculation	5
3.2) Property Characteristics	6
3.3) Index Performance	8
4) Governance and Regulatory Compliance	10
5) Restatement Policy	10
6) Construction of this Index Manual	11
7) Licensing and Trademark	11
8) Further Information	11
9) ESG Disclosures	12
A) Glossary	13
Disclaimer	13

1) Significant Index Administration Events

The following Index Administration events apply to each index of the **Halifax House Price Index (HHPI) 2019 family**.

Table 1: Index Administration Events

Date	Index Administration Event
January 2021	Governance and Regulatory Compliance sections are consolidated under Section 4) — Governance and Regulatory Compliance
April 2019	IHS Markit Benchmark Administration Limited (IMBA UK) officially commences Index Administration
January 2018	Annual attestation of IOSCO compliance
January 1983	Index Commencement Date
January 1992	Index Base Date (base level = 100)

2) HHPI (2019) Overview

When first introduced in 1984, the Halifax House Price Index (HHPI) represented a major advance in the measurement of house price changes in the United Kingdom.

Unlike earlier series, and house price statistics produced by other institutions, the new figures issued by the then Halifax Building Society were standardised rather than based on simple price averages. By allowing for the influence of the different characteristics of houses on their prices, using a database especially established by the Halifax, and maintained by Lloyds Banking Group (LBG), for this purpose, the new series placed the measures on a truly comparable footing, thereby providing a more accurate indication of like-for-like house price movements than was previously possible.

Broadly speaking, the HHPI methodology was left unchanged since its inception in 1983. Whilst the hedonic regression on which the original model is based remains a pre-eminent method of house price index generation in 2019, during the years that have passed since 1983 there have been several developments that encourage methodological upgrading. For instance, changes in the mix of UK housing stock – both geographical and physical housing attributes – plus the reduced influence of certain property characteristics in price determination led, especially in recent years, to an undesirable effect of increasing HHPI index volatility.

Borne out of both a deep knowledge of the original HHPI model, which we define in this document as HHPI (1983) and a careful assessment of the current literature on house price determination provided by

statistics agencies based in the UK and the euro area, S&P DJI has subsequently undertaken a number of methodological enhancements to tackle the aforementioned issues with HHPI (1983). These include:

- refreshing the data exclusion criteria, with particular focus on the inclusion of shared ownership transactions
- replacing existing model characteristics with a more parsimonious set. This selection includes improving the granularity of location characteristics
- creating an enhanced weighting system based on the chain-linking methods used by statistical agencies around the world
- remapping the HHPI sample to current Government Office Region (GOR) specifications to create UK regions consistent with UK official statistics

These enhancements have been combined to create a new set of HHPI indices for users, which we refer to as HHPI (2019), covering the following indices at both the UK national and regional level:

Table 2: List of Halifax House Price Index (HHPI) 2019 family

Index Series	Frequency	Total Number of indices
UK AHAB, SA + NSA UK New Homes, NSA UK Existing Homes, NSA UK First Time Buyers, NSA UK Former Owner Occupiers, NSA	Monthly	6
UK+12 Regions AHAB, SA + NSA UK New Homes, NSA UK+12 Regions Existing Homes, NSA UK+12 Regions First Time Buyers, NSA UK+12 Regions Former Owner Occupiers, NSA	Quarterly	66
UK+12 UK Regions AHAB, NSA UK New Homes, NSA UK+12 Regions Existing Homes, NSA UK+12 Regions First Time Buyers, NSA UK+12 Regions Former Owner Occupiers, NSA	Annual	53

3) Index Methodology

The following sections present an overview of the HHPI (2019) methodology.

The sole source of data for HHPI (2019) remains Lloyds Banking Group (LBG). Using mortgage approval data provided by LBG, it is possible to determine not only the price information related to property transactions, but also several attributes related to the type (detached, semi-detached, terraced etc.), size (bedrooms, floor space in square metres), age (new/old), and location. The dataset is then combined with hedonic regression techniques to generate house price indices.

With the core aim of HHPI (2019) to provide a robust measure of changes in residential property prices, as in the case of HHPI (1983), several types of transaction are excluded from index generation. These include:

- Re-mortgages
- Business use, capital raising, or building mortgages
- Discounted mortgages relative to market value (as determined by observed data that shows the property valuation < 75% of purchase price e.g. the “Right-to-Buy” scheme).

An exception to the discounted mortgage rule is shared ownership mortgages which are, for the first time, included in the new version of the HHPI. We also now include buy-to-let properties and those bought directly from less-conventional vendors e.g. builders.

The effects of including shared ownership mortgages enable the HHPI (2019) to:

- better reflect the current structure of the UK housing market, especially in relation to the trend towards increasing levels of shared ownership among first-time buyers
- enjoy a higher sample size and help to reduce the period-to-period volatility of HHPI both at national and regional levels.

3.1) Index Calculation

The HHPI is calculated by estimating the price of a fixed ‘basket’ of attributes of houses sold in different time periods (an analogy is with the standard basket of goods in the retail price index). By taking a ratio of two valuations we subsequently estimate the change in property prices across a time period.

To reflect the idea that the mix of properties is not necessarily constant and can change between periods, the HHPI (2019) basket of attributes is fixed to a 12-month period and subsequently updated once a year using three years of LBG transactional data (although an exception is the regional weights for the UK level indices, which are calculated using external data from the Land Registry, HMRC and Council of Mortgage Lenders. This is to help guard against any regional bias that may be present in the LBG transactional dataset).

Given that successive years of data are not directly comparable, each basket runs for a 13-month period from January to January (or in the case of a quarterly index, Q1 to Q1). Individual ‘in-year’ price indices for each basket of goods are created with the first January (or Q1) index value set to 100. The ‘in-year’ indices are subsequently ‘chained’ together to provide a continuous time series by taking the month 13 January figure (or quarter 5 figure) as the first reading of the next year’s basket.

This should be viewed as a considerable improvement on the original methodology, which used a standardised house determined in 1983. Throughout recent years there have been a number of changes in property development (such as a rise in the number of bathrooms, the increased use of central heating etc.) that has made the standardised house in 2019 look different to that of 1983. Chain-linking methods subsequently help to address these changes in the housing market and, going forward, provide a natural protection against future changes.

A further update to the methodology is to use a parsimonious and more targeted set of property characteristics. HHPI (1983) utilised a vast array of attributes. Whilst these were relevant in 1983, a number have unfortunately become obsolete or hard to measure e.g. central heating statistics, garage spaces etc. In line with empirical evidence and indices produced around the globe, our new set of characteristics has been chosen to focus primarily on size, type, and location.

Valuing the standardised property with the use of these price-determining characteristics is achieved using the same semi-logarithmic hedonic regression specification employed by the original 1983 HHPI model. In the case of housing, prices reflect the valuation placed by purchasers on a particular set of locational and physical attributes (or characteristics) possessed by each house. The subsequent need

for 'standardisation' arises out of the observation that two houses are not alike: they can differ according to a variety of quantitative and qualitative characteristics relating to the physical attributes of the houses themselves or to their locations.

The difficulty is the implicit value placed by a purchaser on each characteristic cannot be observed because transactions take place in terms of a single total price. Therefore, in order to remove that part of price variation due to changes in the mix of house characteristics over time, and so to measure the variation caused by inflationary factors, it is necessary to disaggregate prices into their constituents statistically. This is achieved by using a multivariate regression equation of the form:

$$\ln(P_i) = \beta_0 + \beta_1 X_1^i + \beta_2 X_2^i + \dots + \beta_j X_k^i + e_i$$

Here P_i reflects the price of an individual property i which is determined by a set of $k = \{1, 2, \dots, n\}$ characteristics X_k^i . If the property has a particular characteristic then it takes the value of 1 or 0, with the exceptions of the number of bedrooms (between 1 and 8) and floor area (m^2 bounded between 30 and 500).

The set of $\beta_1, \beta_2, \dots, \beta_j$ regression coefficients correspond to the qualitative and quantitative characteristics, whilst the group of unmeasured factors (assumed to be randomly distributed) which are specific to each house but for which data are not available is captured by the statistical error e_i .

The regression is subsequently calculated using the widely-used technique of Ordinary Least Squares (OLS).

3.2) Property Characteristics

The index uses a variety of characteristics to determine a standardised house in the UK which, when taken together, help to explain the majority of the variation in house prices. Compared to HHPI (1983), the new version of the model takes a more targeted approach to the standardised house price, focusing on value-added characteristics such as type, size, age and location.

Taking each of these in isolation:

a. Property Type

LBG attributes a property type to each mortgage offer, these being:

Detached, Semi-Detached, Terraced, Flat, Bungalow

As would be expected, detached properties tend to command higher selling prices than semi-detached, which in turn tend to be higher than terraced properties etc.

b. Size

The LBG mortgage data includes information on the size of each property in square metres. Not surprisingly we find that this is a key, statistically significant, determinant of the price of a property i.e. *Ceteris Paribus* the larger the property the greater the value.

The price of the property is also partly explained by the number of bedrooms that it possesses. The higher the number of bedrooms the higher the price tends to be. LBG mortgage offers contain information on bedroom numbers and, as such, this variable is included in the regression specification.

c. Age

New houses tend to attract a price premium relative to older properties with similar attributes. Including a categorical characteristic that encapsulates this (i.e. new or not new) is found to be statistically significant in our hedonic regression specification and is subsequently included as an explanatory variable.

d. Location

In line with HHPI (1983), a set of dummy variables that encapsulates a particular UK region that the property resides within continues to be used. A slight variation on the original methodology is the use of Government Office Region classifications (GOR) for England, rather than the original Economic Planning Region (EPR) classification. This provides us with nine English regions: Eastern England, East Midlands, Greater London, North East, North West, South East, South West, West Midlands and Yorkshire & Humberside. These are combined with Northern Ireland, Scotland and Wales to provide 12 UK regions.

A notable difference between the 1983 and 2019 HHPI indices has been greater focus on the treatment of locational property characteristics. The existing methodology used the EPR as the only price-determining locational factor. However, within any given region there will be variance in terms of desirability between postcode areas and this will be reflected in respective house prices. Greater granularity within the location variables can be expected to notably improve the ability to accurately estimate house prices.

Whilst a commercially available location variable (ACORN) is used by the Nationwide and the Office for National Statistics (ONS) in the generation of their own, similar, house price indices, S&P DJI has created its own proprietary classification system to help determine an area's house-price level in the context of its GOR region and housing-mix.

Note UK and regional HHPI (2019) models may contain differences in explanatory variables employed in respective hedonic regression specifications. These differences are seen in [Table 3: HPI Regression Specifications](#).

Table 3: HPI Regression Specifications

HHPI Regression Specifications					
Explanatory Variables (Dependent Variable: In Purchase Price)	✓ denotes variables included		✗ denotes variable excluded		
	All Houses	Existing Houses / New Houses	First-Time Buyers / Former Owner Occupiers	GOR Regions	
				All, FTB, FOO	EXI / NEW
Property Type	Omitted Dummy Variable				
Detached	✓	✓	✓	✓	✓
Semi-Detached	✓	✓	✓	✓	✓
Terraced	✓	✓	✓	✓	✓
Bungalow	✓	✓	✓	✓	✓
Flat	✓	✓	✓	✓	✓
Size	Omitted Dummy Variable				
Square Metres	✓	✓	✓	✓	✓
Number of Bedrooms	✓	✓	✓	✓	✓
Age	Omitted Dummy Variable				
New House	✓	✗	✓	✓	✗
Property Location - Region	Omitted Dummy Variable				
Eastern England	✓	✓	✓	✗	✗
East Midlands	✓	✓	✓	✗	✗
North East	✓	✓	✓	✗	✗
North East	✓	✓	✓	✗	✗
North West	✓	✓	✓	✗	✗
Northern Ireland	✓	✓	✓	✗	✗
Scotland	✓	✓	✓	✗	✗
South East	Omitted Dummy Variable				
South West	✓	✓	✓	✗	✗
Wales	✓	✓	✓	✗	✗
West Midlands	✓	✓	✓	✗	✗
Yorkshire & Humberside	✓	✓	✓	✗	✗
Property Location - Regional Postcode	Omitted Dummy Variable				
PROP1	✓	✓	✓	✓	✓
PROP2	✓	✓	✓	✓	✓
PROP3	✓	✓	✓	✓	✓
PROP4	✓	✓	✓	✓	✓
PROP5	Omitted Dummy Variable				
PROP6	✓	✓	✓	✓	✓
PROP7	✓	✓	✓	✓	✓
PROP8	✓	✓	✓	✓	✓
PROP9	✓	✓	✓	✓	✓

3.3) Index Performance

The model changes have resulted in a number of improvements to HHPI performance, which we define from the perspective of three key metrics:

- statistical output from the regression calculations e.g. explanatory power (RSQ statistics), parameter significance as measured by t-statistics
- sample size
- index volatility

Table 4: HHPI (2019) Key Metrics (July 2007 to June 2018) provides some summary statistics related to these metrics at the UK level, not only for the All House All Buyers (AHAB) indices, but also the sub-indices of First-Time Buyers (FTB), Former Owner Occupiers (FOO) and Existing (EXI).

Table 4: HHPI (2019) Key Metrics (July 2007 to June 2018)

Index Series (United Kingdom)	Sample Gain	RSQ	Volatility Improvement (y/y inflation rates)	Standardised Price (at Jun-18)	Price Difference to HHPI1 (% 5-Year Average)
AHAB	35%	82.4%	43.1%	£231,903	2.2%
First-Time Buyers	36%	82.3%	49.0%	£183,536	5.2%
Former Owner Occupiers	33%	83.7%	48.3%	£278,868	4.2%
Existing Houses	20%	84.2%	63.5%	£220,398	-4.7%
New Houses	n/a	84.1%	n/a	£244,815	n/a

Notes: Gain columns reflect the difference between equivalent HHPI1 (1983) and HHPI (2019) data. In this instance, a positive number equates to a higher reading for HHPI (2019) models. Note all comparisons cover the period July 2007 to June 2018 and, reflective of their market sensitivity, we do not include raw sample size numbers. We measure volatility by taking the square root of the average squared monthly movement in annual rates of change for both the HHPI (1983) and HHPI (2019) indices. Using a ratio of these two numbers provides an estimate of the relative difference between the monthly movements of the two data series. A positive number in the tables reflect favourable performance for HHPI (2019) models.

Table 4: HHPI (2019) Key Metrics (July 2007 to June 2018) highlights the positive impacts that the model refinements have made on all of our key performance metrics.

Firstly, amendments of the data cleansing rules to include shared-ownership, buy-to-let and non-typical vendors such as builders has led to a noticeable gain in sample size over the test period. At the UK level the increase is 35%. There is a slightly stronger increase in the number of first-time buyers (FTB) and we also have a greater representation of new properties in our sample (as implied by the number of existing houses rising by 20% on average). Note this is broadly expected given the inclusion of shared ownership and direct purchases from builders. With this in mind, we have taken the opportunity to supply a New Houses Index which had been previously discontinued.

Secondly, the addition of our new property location characteristics, allied with a parsimonious regression specification focusing on size, age, location and property type leads to noticeable and considerable gains in the explanatory power of the indices compared to HHPI (1983).

The AHAB UK model, with a RSQ average of 82.4%, is a considerable improvement on HHPI (1983) – an increase of 14.2 pts. The three other currently available models – FTB, FOO and EXI – also enjoy noticeable gains in explanatory power, whilst the RSQ reading for new houses is over 80%.

Thirdly, the implied volatility of all indices is reduced, reflective of the new parsimonious regression specification which has removed variables that have proven difficult in recent years to identify coefficient values for i.e. central heating, garage spaces etc. At 43.1%, the improvement in volatility seen at the UK level is considerable, with even larger improvements seen for FTB (49.0%), FOO (48.3%) and EXI (63.5%).

4) Governance and Regulatory Compliance

IHS Markit Benchmark Administration Limited (IMBA UK) is the Administrator of HHPI 2019 Index family. Information on IMBA UK's governance and compliance approach can be found [here](#). This document covers:

- Governance arrangements, including external committees
- Input data integrity
- Conflicts of interest management
- Market disruption and Force Majeure
- Methodology changes and cessations
- Complaints
- Errors and restatements
- Reporting of infringements and misconduct
- Methodology reviews
- Business continuity

More details about IMBA UK can be found on the [Administrator's website](#).

5) Restatement Policy

IHS Markit Benchmark Administration Limited (IMBA UK or the Administrator) is the appointed Administrator of the Halifax House Price Index (HHPI). The Administrator is committed to conducting its business with integrity and to providing index information of the highest quality to its customers and index stakeholders. However, the Administrator recognizes that, in some situations, inaccuracies can arise that may warrant a restatement of one or more indices. Such inaccuracies may be caused by a range of events including:

- Incorrect mortgage transaction data provided by the contributor;
- Unavailability of up-to-date mortgage transaction data at the time of index calculation;
- Failure of exclusion criteria; or
- Index model calculation error.

The Administrator has implemented a wide range of pre-calculation checks throughout the data collection process to capture and validate exceptions which could indicate an error or data problem. These include checks on large transaction volume movements. Additional comparative and consistency checks are also in place. Any exception or warning alert is reviewed and analyzed for potential problems. In the event that exceptions are caused by an error, the HHPI index analysts will correct the error before official publication.

In the instance an inaccuracy is not caught and resolved before index calculation and publication or if input data received is revised retrospectively, the Administrator will review the impact on affected index values. In order to decide whether to restate an index, the Administrator takes multiple factors into consideration including:

- The size of the deviation between published and updated index levels;
- Dates of the restatement period, in particular:
- how recent the restatement period occurred; and
- the length of the period to be restated.
- Client impact; and
- Index usage.

If the analysis indicates that a revision of the Index could be warranted, Index Administration Committee (**IAC**) will make a restatement determination. If the IAC decides to revise the HHPI values, the reason for the restatement together with the revised index values will be published.

In addition, the Administrator will compile an incident report to summarize the incident, the root cause and set forth remedial actions to avoid reoccurrence in the future, where such remedial actions are applicable.

Use of the Halifax name and logo on the Halifax House Price Index (HHPI) Restatement Policy by S&P DJI is under license from Lloyds Banking Group and its affiliates.

6) Construction of this Index Manual

The Index Manual is published by the Index Administrator. In the event of any inconsistency between the English language version of this Index Manual and that translated into any other language, this English version shall prevail.

7) Licensing and Trademark

All intellectual property rights in the Index belong to S&P DJI unless otherwise specified. The use of the Halifax name and logo on the Index by S&P DJI is under licence from Lloyds and its affiliates. Any unauthorised use of any content appearing herein may violate the intellectual property rights of S&P DJI or Lloyds under relevant intellectual property laws such as copyright laws, trademark laws, regulations and statutes and is strictly prohibited. Persons seeking to place reliance on the Index for their own or third party commercial purposes do so at their own risk. A licence from S&P DJI is required for benchmark and all other uses of the Halifax House Price Index (HHPI) 2019 family.

8) Further Information

Formal complaints can be sent electronically to a specifically dedicated email address – spdji_compliance@spglobal.com. Please note that this dedicated email address should only be used to log formal complaints.

For any general index enquiries, please contact index_services@spglobal.com.

Ownership: the **Index Owner** is S&P DJI.

9) ESG Disclosures

EXPLANATION OF HOW ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) FACTORS ARE REFLECTED IN THE KEY ELEMENTS OF THE BENCHMARK METHODOLOGY [1]		
1	Name of the benchmark administrator.	IHS Markit Benchmark Administration Limited (IMBA)
2	Underlying asset class of the ESG benchmark. [2]	N/A
3	Name of the S&P Dow Jones Indices benchmark or family of benchmarks.	Halifax HPI 2019 Benchmark Statement
4	Do any of the indices maintained by this methodology take into account ESG factors?	No
Appendix latest update:		March 2023
Appendix first publication		March 2023

[1] 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 2019).

[2] 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.

A) Glossary

Term	Definition
HHPI	means Halifax House Price Index (HHPI) 2019 family.
IHS Markit Benchmark Administration Limited (IMBA UK)	means the Administrator of the HHPI 2019 index family
Index Base Date	is the date of the initial level of the index. See Table 1: Index Administration Events .
Index Commencement Date	is the date the index level was first published. See Table 1: Index Administration Events .
Index Manual	means this document, as amended, replaced or substituted, from time to time.
Index Owner	means S&P DJI.
S&P DJI Website	means the following website: https://www.spglobal.com/spdji/en/ .

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 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, indirect, 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, www.standardandpoors.com (free of charge), and www.ratingsdirect.com and www.globalcreditportal.com (subscription), and may be distributed through other means, including via S&P Global Ratings publications and third-party redistributors. Additional information about our ratings fees is available at www.standardandpoors.com/usratingsfees.

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.