



CHANGES TO BENCHMARK METHODOLOGY AND CESSATION POLICY

JANUARY 2019

1. Background

Invesco Indexing LLC (“Invesco Indexing”) periodically reviews each Index and its accompanying methodology in an effort to ensure the Index continues to accurately represent that portion of the market it was originally intended to and deliver the outcomes one would expect from the Index’s exposures.

This policy is intended to describe the procedures for the internal review of the methodologies, changes to the methodologies and procedures performed when the Index administered is ceasing publication.

2. Internal Review

Invesco Indexing periodically, at least annually, reviews each Index and its accompanying methodology, in addition to periodic rebalancing in an effort to ensure the Index continues to accurately represent that portion of the market it was originally intended to, and deliver the outcomes one would expect from the Index’s exposures.

Additional reviews may be conducted during extreme market events, such as ongoing insufficient underlying market liquidity, insufficient input data or after significant market events that significantly impact the benchmark.

The results of the review, including any analysis performed and recommendation for any changes will be presented in the “Index Review Meeting” to the Index Review Team (“IRT”). This meeting is held between members of Invesco Indexing LLC involved in the provision of benchmarks and is to represent a challenge to the review performed.

2.1 Changes to Benchmark Methodology

When a change to the documented elements of the published methodology is proposed by the IRT, it will assess whether the change is material or not. The Index Oversight Committee (“IOC”) is responsible for overseeing any changes to the benchmark methodology and is able to request Invesco to consult on such changes.

2.1.1 Non-material Changes

When changes are not material, these changes tend to be cases in which language needs to be clarified in the methodology or when changes are determined by the IRT not to impact meaningfully the portion of the market that the benchmark was originally intended to represent. For these type of changes, a notification will be provided on the Invesco Indexing website, www.invescoindexing.com. Non-material changes will not be subject to mandatory review by the IOC.

Once the change has been implemented, the methodology will be updated and made available on the Invesco Indexing website.

2.1.2 Material Changes

When a material change to the methodology is required, Invesco Indexing will consult publicly with stakeholders - such as clients of the Index - with a proposal regarding specific Index methodology changes, stating the key elements impacted, the rationale behind the changes, a clear timeframe for feedback on the consultation and when the change is expected to be made. The proposal also will be published on the Invesco Indexing website (www.invescoindexing.com) and distributed where necessary. Invesco Indexing will solicit stakeholder feedback and may conduct further research specific to these updates as appropriate.

Any stakeholder feedback submitted to indexsupport@invesco.com and Invesco Indexing's responses will be made accessible upon request, unless confidentiality has been requested by the author of comments.

The proposed material change will be reviewed by the Index Advisory Committee ("IAC") who will provide guidance, if necessary, to the IRT and then presented to the IOC to ensure proper adherence to the governing policy.

Any finalized updates will be announced at the completion of the consultation. This announcement will state whether the change(s) as proposed will be incorporated in the Index as well as the effective date of the change(s).

2.2 Cessation

When the IRT considers that an Index no longer represents the market or economic reality it was originally intended to measure, or when Invesco Indexing wishes to cease publication, Invesco Indexing may propose ceasing publication of the Index. The process for ceasing the Index generally will follow the process above for a material change to a methodology, but include the following modifications.

When there are assets invested in a portfolio based on the Index, the public consultation also will consider if there is an alternative Index (or Indexes) that could be proposed as a substitute, and indicate why such Index would be a suitable alternative.

When there are no assets invested in a portfolio based on the Index, Invesco Indexing will simply inform the IAC and the IOC of their intention to cease publication of the Index and the timeline for doing so.

3. Review

This Policy shall be reviewed on a periodic basis, no less frequently than annually by the IRT. On top of that, the IOC is also reviewing and approving procedures for cessation of the benchmark at least annually.

Legal Owner: Kenneth Masse

Last Review: January 2019