

TILT INDEX GOVERNANCE POLICY

Tilt Indices LLC

Version 1.0 | April 2026

1. Purpose

This Index Governance Policy (the “Policy”) sets forth the governance framework pursuant to which Tilt Indices LLC (“Tilt”) administers, maintains, and oversees its investment indexes (each, an “Index” and collectively, the “Indexes”). The Policy is designed to promote the integrity, transparency, independence, and reliability of the Indexes and to support confidence among users, licensees, and other stakeholders.

2. Scope

This Policy applies to all Indexes published or administered by Tilt and to all personnel, committees, and agents involved in the design, calculation, maintenance, review, and oversight of such Indexes.

3. Governance Structure

Tilt maintains a formal governance framework consisting of three standing committees responsible for index methodology, operations, and independent oversight (the “Committees”). Each Committee operates pursuant to a written charter approved by the General Counsel of Tilt Indices LLC (or, in the case of TIOC Oversight, by the sole member of Tilt Indices LLC). The three Committees are:

- Tilt Index Methodology Committee (“TIMC” – also referred to in the General Index Methodology & Calculation Manual as the “Index Policy Committee”), which is responsible for methodological governance, including the design and approval of new indexes, material methodology changes, and index terminations.
- Tilt Index Operations Committee (“TIOC Operations”), which oversees the day-to-day operational management of all Indexes, including rebalancing, reconstitution, restatements, market classification, and contingency management.
- Tilt Index Oversight Committee (“TIOC Oversight”), which provides independent oversight of all aspects of the governance and administration of the Indexes, consistent with the IOSCO Principles for Financial Benchmarks.

The composition, responsibilities, and procedures of each Committee are further described in that Committee’s charter. All Committee charters and related governance documents are available to stakeholders upon request and are updated from time to time to reflect changes in best practices, regulatory expectations, or Tilt’s business.

4. Roles and Responsibilities

The respective roles of the Committees are as follows:

TIMC. The TIMC is responsible for overseeing new index development, reviewing and approving material methodology changes, and approving index terminations. The TIMC ensures that index methodologies are rules-based, transparent, and consistent with Tilt’s research principles. The

TIMC oversees the annual methodology review required by applicable governance standards and initiates stakeholder consultations where appropriate.

TIOC Operations. TIOC Operations governs the day-to-day operational processes of all live Indexes, including rebalancing and reconstitution approvals, management of corrections and restatements, market classification decisions, contingency planning, and exception handling. TIOC Operations reports to the General Counsel of Tilt Indices LLC and escalates matters to TIOC Oversight as warranted.

TIOC Oversight. TIOC Oversight provides independent oversight of all aspects of benchmark governance and administration. It oversees the control framework, reviews audit findings, serves as the final escalation body for complaints, oversees conflicts of interest management, and ensures adherence to applicable regulatory and governance standards. TIOC Oversight reports to the sole member of Tilt Indices LLC and is separate and independent from the index business and the other Committees.

Day-to-day index operations may be delegated to qualified staff, subject to Committee oversight.

5. Independence and Conflicts of Interest

Tilt seeks to maintain the independence of its Index governance function. Committee members and relevant personnel are required to identify, disclose, and manage actual or potential conflicts of interest in accordance with the Tilt Index Conflicts of Interest Policy and the Information Barrier Policy. Conflicts of interest are recorded and reported to TIOC Oversight. Where a Committee member has a material conflict with respect to a specific matter, that member shall recuse themselves from participating in any decision relating to that matter.

The TIOC Oversight is organized within Tilt's structure but is separate and independent from the index business, index management, and the other Committees. TIOC Oversight members are selected on the basis of their independence from day-to-day index administration.

6. Transparency and Disclosure

Tilt makes publicly available sufficient information regarding each Index to enable users to understand the objectives, construction, and maintenance of the Index, subject to the protection of proprietary information. Specifically:

- Each Index's methodology is documented and publicly available.
- Material methodology changes, index terminations, and rebalancing results are communicated to stakeholders in advance in accordance with the Tilt Index Methodology Change Policy, the Tilt Index Termination Policy, and the General Index Methodology & Calculation Manual, respectively.
- Governance policies and committee charters are available to stakeholders upon request.

Detailed disclosure and announcement procedures are set forth in the General Index Methodology & Calculation Manual and the applicable policies referenced herein.

7. IOSCO Compliance

Tilt's governance framework is designed to be consistent with the Principles for Financial Benchmarks published by the International Organization of Securities Commissions ("IOSCO"). Tilt

periodically reviews its compliance with applicable IOSCO Principles and takes appropriate steps to align its practices with applicable industry standards.

8. Review and Oversight

This Policy and the overall governance framework are reviewed at least annually by TIOC Oversight and updated as necessary to reflect changes in best practices, regulatory expectations, or Tilt's business. Any material amendments to this Policy are approved by TIOC Oversight and the General Counsel of Tilt Indices LLC.

9. Recordkeeping

Tilt maintains records of Committee meetings, decisions, and supporting materials in accordance with its record retention policies. Minutes of each Committee meeting are retained and made available to TIOC Oversight upon request.