Statement of Principles
For FTSE Russell Equity Indexes
v1.9

This Statement of Principles applies to any index series specifically referenced in the FTSE Index Ground Rules or Russell US Indexes Construction and Methodology document.
Statement of Principles

Indexes need to keep abreast of changing markets and the published index methodology documents including the FTSE index Ground Rules, the FTSE Russell Corporate Actions and Events Guide for Market Capitalisation Weighted Indexes, the FTSE Russell Corporate Actions and Events Guide for Non-Market Capitalisation Weighted Indexes and the Russell US Indexes Construction and Methodology document – collectively referred to in this Statement as the “Index Methodology” – cannot anticipate every eventuality. For equity indexes where the Index Methodology does not fully cover a specific event or development, FTSE Russell\(^1\) will determine the appropriate treatment by reference to the Guiding Principles, set out below, which summarise the ethos underlying FTSE Russell’s approach to such indexes. Other indexes may apply different principles as specified in their Index Methodology.

Where there is an actual or potential conflict between the Index Methodology and this Statement of Principles concerning any decision required for the management of the index series, precedence shall be given to this Statement of Principles. In such circumstances or when application of the Index Methodology may reasonably be expected to lead to market distortion, FTSE Russell shall apply an exception to the Index Methodology. Any such exception to the Index Methodology should be approved by an authorised member of the FTSE Russell Policy Team, and subsequently reported to the FTSE Russell Governance Board. Decisions by FTSE Russell may be subject to appeal on grounds and by parties specified in the Index Methodology.

This Statement of Principles is reviewed annually and any changes proposed by FTSE Russell are presented to the FTSE Russell Policy Advisory Board for discussion before approval by the FTSE Russell Governance Board. This Statement of Principles applies only to those index series where the Statement of Principles is specifically referenced in the Index Methodology.

1. The indexes and index-related statistics are intended to reflect the investment markets or underlying interests included in the index definitions. The composition of indexes will be reviewed periodically to ensure that they remain investable and representative of the markets or underlying interests included in the index descriptions set against the objectives of avoiding inconsequential changes and implementing updates efficiently.

2. The index calculation methods should be capable of being readily understood and followed by index users. In so far as possible, the index calculation should only use data that are in the public arena. However, proprietary data from FTSE Russell or other parties involved in the calculation of FTSE Russell

\(^1\) FTSE Russell is a trading name of FTSE International Limited (FTSE), Frank Russell Company (Russell), FTSE TMX Global Debt Capital Markets Inc. and FTSE TMX Global Debt Capital Markets Limited (together, “FTSE TMX”) and MTSNext Limited. FTSE, Russell and FTSE TMX are each benchmark administrators of indexes. References to FTSE Russell should be interpreted as a reference to the relevant benchmark administrator for the relevant index.
non-capitalisation weighted indexes may be subject to limitations on its use and its circulation to third parties.

3. Corporate data used in the indexes should originate from an authoritative source, which will normally be as published by constituent companies and reproduced where appropriate by reliable market vendors. All income statistics used in the computation of investment returns should be based on declared dividends. Market prices used in index calculations should be taken from reliable sources and reflect the terms on which trades have taken place in the open market.

4. The treatment of corporate events should reflect how such events are likely to be dealt with in investment portfolios to maintain the portfolio structure in line with the target set out in the index objective and index methodology. The treatment should normally be designed to minimise the trading activity required by investors to match the index performance.

5. To promote the predictability of index treatment of corporate events, stability in calculation methods and in the use of data should be maintained wherever practical. In assessing best practice, FTSE Russell may consult as it considers appropriate to ensure that indexes continue to meet current and future market needs.

6. To ensure that no index user can procure any advantage from predicting the future composition of an index, the Index Methodology shall include a description of the use of any company data that is required to determine the eligibility and weightings of index constituents. FTSE Russell will make available information regarding periodic index reviews to all users simultaneously.

7. The interests of all users should be considered in managing the indexes and decisions taken independent of any single interest group. In determining index policy, unless issues relate to a single or specific group of markets, global consistency of treatment should apply as far as practical and decisions incorporate the views of all users.
Further information

For further information on FTSE Russell Indexes please visit www.ftserussell.com or email info@ftserussell.com. Contact details can also be found on this website.