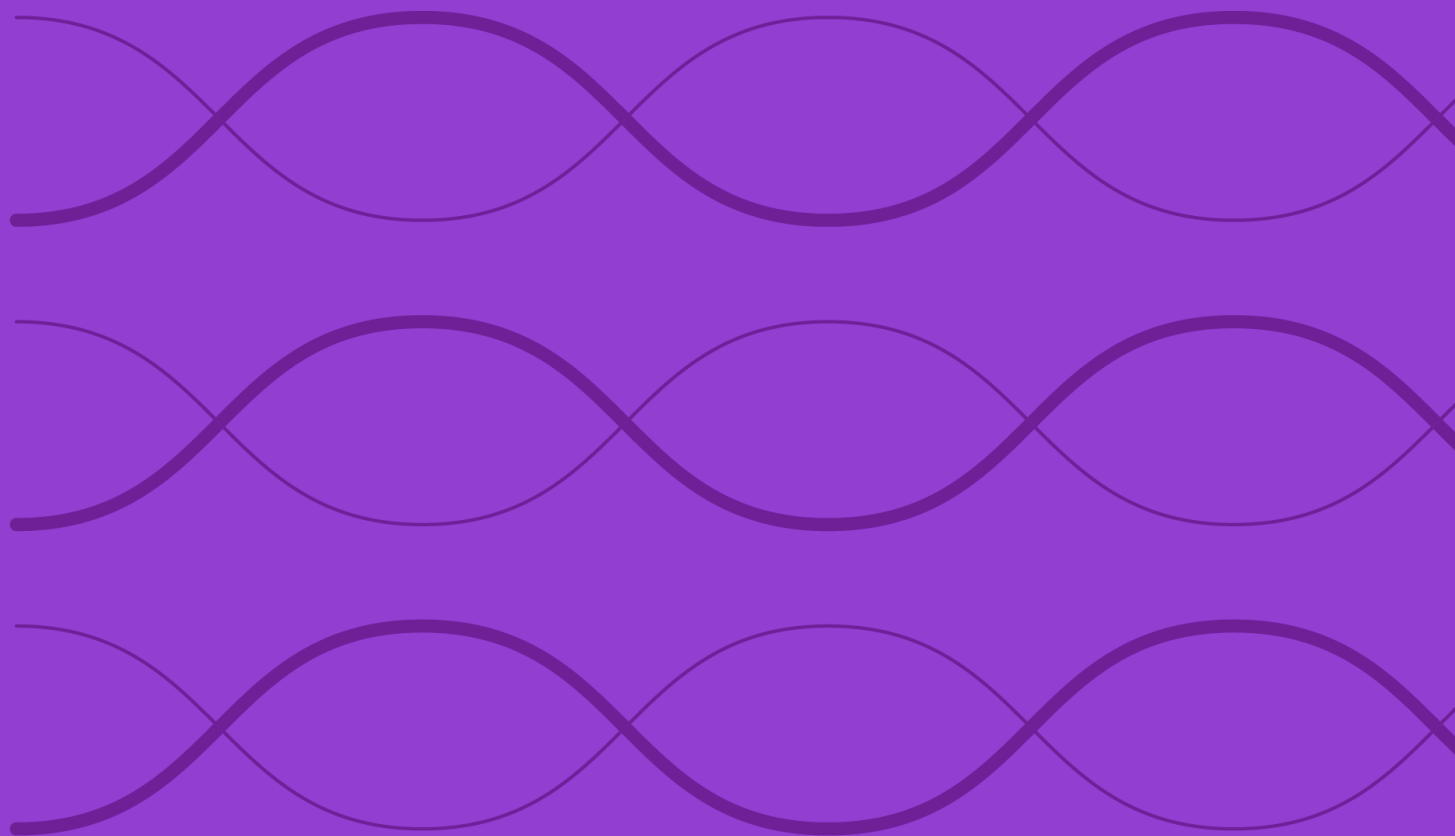


Construction Rules for the Morningstar[®] US Small-Mid Cap Moat Focus IndexSM



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Overview

Shaped by the forward-looking insights of Morningstar's equity analysts, the Morningstar US Small-Mid Cap Moat Focus Index is designed to provide exposure to U.S. small- and mid-cap stocks with durable competitive advantages and attractive valuations. Unconstrained by traditional style classifications, this index can move wherever the most attractive valuations are found in the parent benchmark. This unique approach combines fundamental insights with objective portfolio construction, which facilitates consistency and investability.

This index leverages Morningstar's economic moat ratings. Wide moat companies are those that Morningstar's equity research team believes will maintain its competitive advantage(s) for at least 20 years. Narrow moat companies are those that Morningstar's equity research team believes will maintain its competitive advantage(s) for at least 10 years. Wide and narrow moat companies from the Morningstar® US Small-Mid Cap Index (the "Parent Index") are eligible for inclusion.

From this group, the index targets stocks that are attractively priced based on the issuer's common stock price to Morningstar's equity research team's estimate of fair value at the time of each Index review. Morningstar's equity research team's fair value estimates are calculated using a standardized, proprietary valuation model.

For more information on the moat rating process and fair value estimation performed by Morningstar Equity Research, refer to [Morningstar Equity Research Methodology](#).

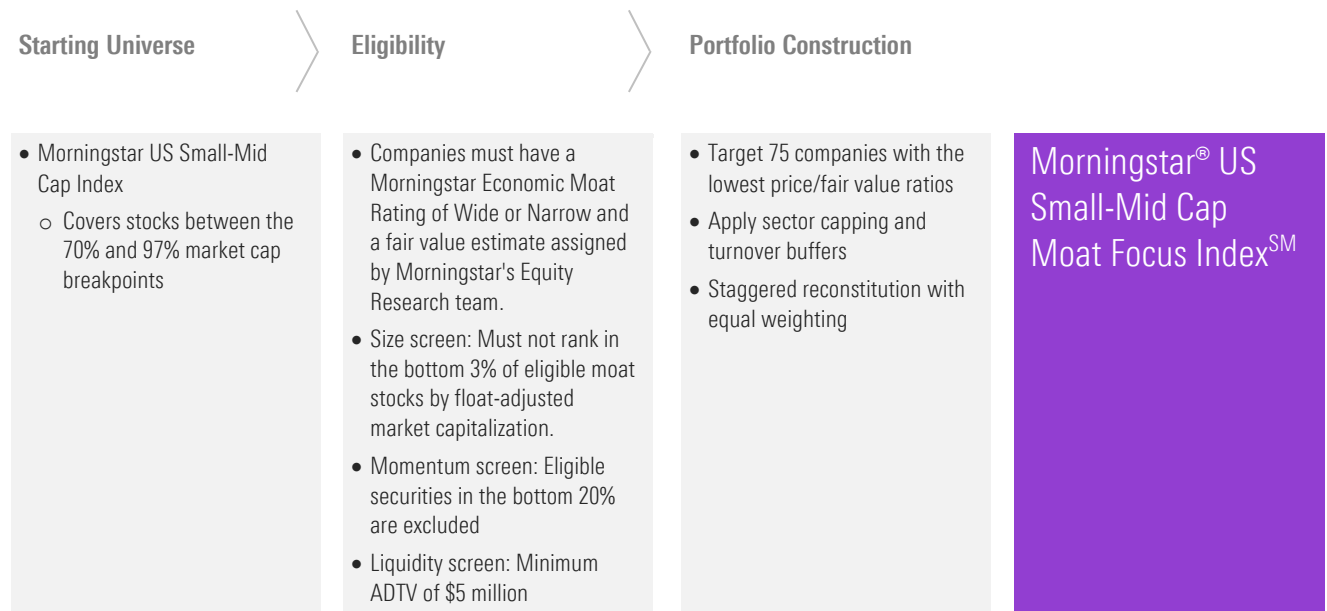
This index does not incorporate environmental, social, or governance criteria.

Index Inception and Performance Start Date

The index inception date is July 25, 2022, and the performance start date, when the first back-tested index value was calculated, is March 18, 2011.

Index Construction

Exhibit 1: Construction Process



Assigning Stocks to the Index

Starting Universe

At each reconstitution, securities for the Morningstar US Small-Mid Cap Moat Focus Index are derived from the Morningstar U.S. Small-Mid Cap Index (benchmark). For more details on benchmark construction, refer to the construction rules for the [Morningstar US Market Indexes](#).

Security Selection

To be eligible for inclusion in the Index, all constituents must meet the following criteria in sequence:

- Analyst Data
 - The company must be assigned an economic moat rating of wide or narrow by Morningstar's Equity Research team.
 - The company must be assigned a fair value estimate by Morningstar's Equity Research team.
 - The fair value estimate must not be under review at the time of reconstitution.
- The company must have 12 months of price history.
- Minimum float market capitalization filter
 - At each reconstitution date in the subportfolio getting reconstituted, securities with a wide or narrow moat rating and fair value estimate from the parent benchmark will be ranked on float market capitalization and those securities ranking in the bottom three percent (by count) based on lowest float market capitalization will not be eligible for inclusion in the index.
- If a company has more than one eligible share class:

- Select the one that is a current index constituent.
- Otherwise, select the most liquid share class determined by Morningstar Indexes.
- Momentum Screen
 - Eligible securities are ranked by the percentage change in price from 12 months ago. The securities in the bottom 20% are screened out.
- Liquidity Filter
 - Non-index constituents with having three-month average daily trading value, or ADTV, of less than \$5 million are screened out.
- Buffer Rules
 - Index constituents of the sub-portfolio ranked within the top 150% of target count in the eligible universe based on current market price/fair value ratio are given preference in subsequent steps.
- Sector Capping
 - At the time of reconstitution, the maximum weight of an individual sector in each sub-portfolio is capped at its corresponding weight in the benchmark + 10% or 40%, whichever is higher. This constraint is enforced through stock selection. Maximum sector weight = Max (40%, benchmark weight + 10%)
- Portfolio Selection
 - The aggregate portfolio is formed from two subportfolios. All buffered constituents are retained in the reconstituted subportfolio. The remaining eligible companies are ranked by their current market price/fair value ratios (from low to high), and those trading at the lowest ratios are included in the index subportfolio until the number of constituents reaches 75.

Number of Stocks

The Morningstar US Small-Mid Cap Moat Focus Index consists of two subportfolios, reconstituted on staggered quarters, which each target 75 companies based on a transparent ranking system subject to selection and eligibility criteria at reconstitution. Because the reconstitution of the two subportfolios is staggered, the index may have been 75 and 150 constituents. However, if securities fall short of the selection and eligibility criteria, or if securities are added or deleted as a result of corporate actions after reconstitution, the indexes can have more or fewer than the targeted number. In addition, securities that are deleted from the Morningstar US Market Index after June and December reconstitutions are simultaneously deleted from the Morningstar US Small-Mid Cap Moat Focus Index.

Index Weighting

The index is equal weighted. For more details, refer to the [Morningstar Indexes Calculation Methodology rulebook](#).

Index Maintenance and Calculation

Scheduled Maintenance

The subportfolios are reconstituted semi-annually with a quarterly staggered schedule. Consequently, about half of the total index membership is reset every quarter in March, June, September, and December on the Monday following the third Friday. If Monday is a holiday, it is effective on the following business day. In addition, the subportfolio weights are reset to 50% each in June and December. Refer to Appendix 3 for the staggered reconstitution implementation process.

The analyst data (moat rating and fair value estimates) used to reconstitute the index is as of the Tuesday before the second Friday of the reconstitution month. Refer to Appendix 2 for details on reconstitution and rebalancing.

Index files are published according to the U.S. calendar schedule. For more information, please refer to the [Morningstar Indexes Holiday Calendar](#).

Corporate Actions

The treatment of corporate actions will be as per the alternatively-weighted indexes. For more details, please refer to the [Morningstar Indexes Corporate Actions Methodology rulebook](#).

Index Calculation and Price Data

Details about index calculations and price data can be found in their respective rulebooks: [Morningstar Indexes Calculation Methodology](#) and [Equity Closing Prices Used for Index Calculation](#).

Methodology Review and Index Cessation Policy

The index methodology is continually reviewed to ensure it achieves all stated objectives. These reviews consider corporate action treatment, selection, and maintenance procedures. Subscribers to the index will be notified before any methodology changes are made. For more details, refer to the [Morningstar Index Methodology Change Policy](#).

Morningstar also notifies all subscribers and stakeholders of the index that circumstances might arise that require a material change to the index or a possible cessation of the index. Circumstances that could lead to an index cessation include, but are not limited to, market structure change, product definition change, inadequate supply of data, insufficient revenue associated with the index, insufficient number of clients using the index, and/or other external factors beyond the control of the Morningstar Index Methodology Committee.

Because the cessation of the index or benchmark index could disrupt subscriber products that reference this index, all subscribers are encouraged to have robust fallback procedures if an index is terminated. For more details, refer to the [Morningstar Index Cessation Process](#).

Data Correction and Precision

Intraday Index Data Corrections

Commercially reasonable efforts are made to ensure the accuracy of data used in real-time index calculations. If incorrect price or corporate action data affects index daily highs or lows, it is corrected retroactively as soon as is feasible.

Index-Related Data and Divisor Corrections

Incorrect pricing and corporate action data for individual issues in the database will generally be corrected upon detection. In addition, an incorrect divisor of an index, if discovered within five days of its occurrence, will be fixed retroactively on the day it is discovered to prevent an error from being carried forward. Commercially reasonable efforts are made to correct an older error subject to its significance and feasibility.

For more details, refer to the [Recalculation Guidelines](#).

Computational and Reporting Precision

For reporting purposes, index values are rounded to two decimal places and divisors are rounded to appropriate decimal places.

Exceptions

While Morningstar will seek to apply the method described above, the market environment, supervisory, legal, financial, or tax reasons may require an alternative approach to be adopted. A decision to take an alternative approach will be made by the relevant Morningstar Index Methodology Committee, and in all instances, the application of a nonstandard process will be reported to the Morningstar Index Oversight Committee.

Appendixes

Appendix 1: Modifications to the Rulebook

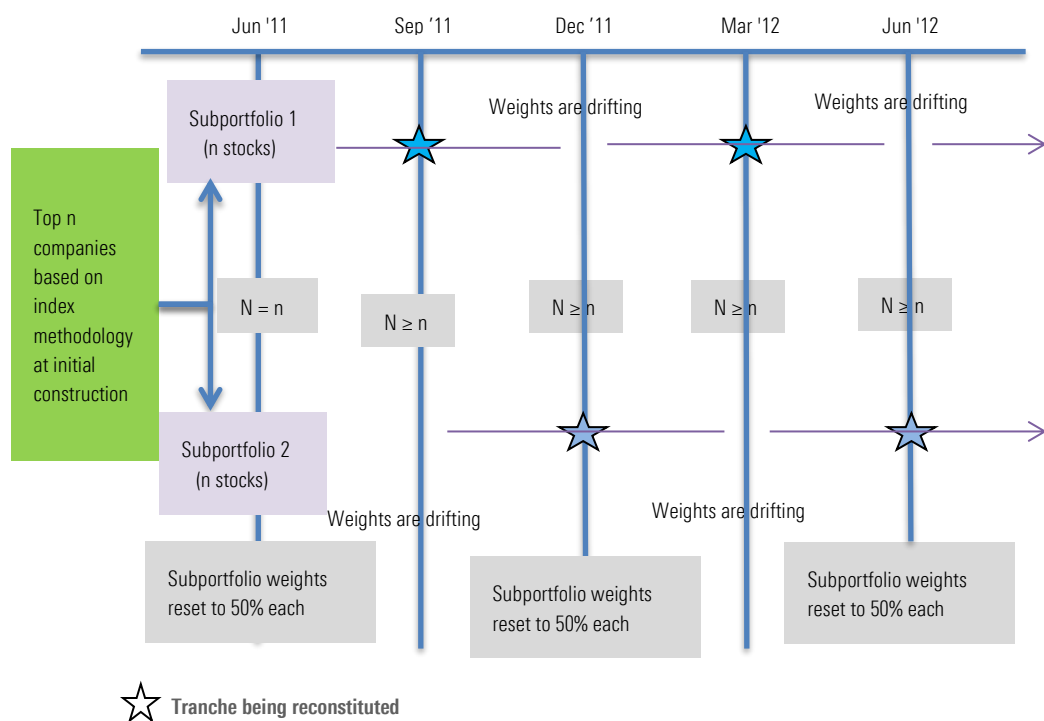
Section	Description of Change	Update Date
Entire rulebook	Moved to new template	April 2023
Overview	Index description updated	April 2023

Appendix 2: Glossary

Terms	Description
Reconstitution	During each reconstitution, the steps mentioned in the index construction process are performed, resulting in membership reset.
Rebalance	During each rebalancing, the weights are reset.

Appendix 3: Staggered Reconstitution Process

Exhibit 2 Staggered Reconstitution Schematic



The portfolio construction process is described below.

1. At initial construction both subportfolios are reconstituted at the same time and therefore have an identical portfolio composition. The sub-portfolios are set to equal weights at 50% each.

2. In September, the first subportfolio is reconstituted, while the second is not (drifted leg). As a result, the composition of the sub-portfolios may not remain identical.
3. In December, the second subportfolio is reconstituted and the first forms the drifted leg. In addition, the sub-portfolio weights are reset to 50% each and distributed among the securities within them in proportion to their weights.
4. In March, the first subportfolio is reconstituted again.
5. In June, the second subportfolio is reconstituted. In addition, the subportfolio weights are reset to 50%.
6. The process is repeated (go to Step 2)

About Morningstar Indexes

Morningstar Indexes was built to keep up with the evolving needs of investors—and to be a leading-edge advocate for them. Our rich heritage as a transparent, investor-focused leader in data and research uniquely equips us to support individuals, institutions, wealth managers, and advisors in navigating investment opportunities across major asset classes, styles, and strategies. From traditional benchmarks and unique IP-driven indexes to index design, calculation, and distribution services, our solutions span an investment landscape as diverse as investors themselves.

Morningstar Index Methodology Committee

The Morningstar Index Methodology Committee oversees all new index development, index methodology changes, and cessation of indexes for any indexes where Morningstar owns the intellectual property. This committee is also charged with ensuring that indexes align with Morningstar Research principles and values. The group comprises members of the index team with index research, product development, product management, client service, index implementation, and operation expertise who provide the first layer of governance over index design and methodology.

Morningstar Index Operations Committee

The Morningstar Index Operations Committee governs the processes, systems, and exception handling of the day-to-day management of all live indexes, including index rebalancing and reconstitution, restatements, market classification, and contingency management. The committee oversees the annual review of index methodology (as required by U.K. and EU benchmark regulations, or BMR), ensuring that methodologies remain fit for purpose and continue to achieve their stated investment objectives. The group comprises members of the index team with data, operations, corporate actions, product development, index launch, client service, and index management experience who provide the first layer of governance over index operations.

Morningstar Index Oversight Committee

The Morningstar Index Oversight Committee is responsible for the index oversight function as per the requirements of the U.K. and European BMR, providing independent oversight of all aspects of the governance of benchmark administration as required by the relevant BMR. Its remit extends to all calculation and administration-related business activities of Morningstar Indexes, including administration of Morningstar-owned benchmarks as well as client-owned benchmarks and index calculation. The oversight function is part of the organizational structure of Morningstar but is separate and independent from the index business, index management, and the other index committees.

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