DRAFT - FY24 November Independence Representation (Staff with Tracking and

Print

Trading) (New Hire/Re-Hire) (MX)

Employee: Gutierrez Prieto, Luisa Elena **Person ID:** 00832587

Position: XMX-Intern - Services Independence Ruleset: STAFF

Location: Mexico Queretar Independence Scope: U.S. CONSULTING

Complete Date: Period Covered From: 1/8/2024 To:

Tracking & Trading Action Items

Other Attributable Relationships

None identified.

This section of your report summarizes your attributable financial relationships based on your responses in this Independence, Ethics and Compliance Representation. Compare the list below to your Tracking & Trading portfolio and ensure that Tracking & Trading is complete and accurate for all your financial relationships.

Loans

You did not identify any reportable loans.

Insurance

You did not identify any reportable insurance policies.

Accounts

Depository Relationships

Other Investments

Summary Report

The below report provides a summary of all of your responses in this Independence, Ethics and Compliance Representation

I have read the pages titled 'The Importance of the Representation on Independence, Ethics & Compliance' and 'Rules of the Road' and understand that they are integral part of this representation.

Item			Respon	se	
Setting the Stage					
1. Are you submitting an Annual or a Special Purpose, Semi-annual or a Tracking & Trading representation?					
			Purpose	•	
2.	Indicate what type of special	purpose representation you are filling out:	New		
	New Hire/Rehire		Hire/Re-	-	
	 Promotion 		Hire		
	• Office Transfer/Other				
3.	Your current Independence Pr	ofile is:	Staff		
	Ruleset	Scope			

STAFF U.S. CONSULTING

Note: Manager ruleset includes managers, senior managers and managing directors. Staff ruleset includes all levels of staff below the managerial level, including interns and paraprofessionals.

If after reviewing the <u>Guidance</u> you do not agree with this determination, you are required to contact your local support before proceeding with this submission.

- US/USI/GER: <u>Create a ticket</u> with Compliance HelpDesk or call 1-877-TOCMPLY (1-877-862-6759)
- Israel: <u>IL Independence</u>

4.	Do you have a <u>spouse/spousal equivalent</u> ?	No
5.	Do you have dependent(s)?	No
6.	Are you or your Immediate Family members a beneficiary of a trust/recipient of an inheritance?	No
7.	Are you or your Immediate Family currently acting as a trustee/co-trustee of a trust or executor/co-executor of an estate, will or inheritance?	No
8.	Do you or your <u>Immediate Family</u> members have an <u>executed</u> power of attorney over someone else's financial relationships?	No
9.	Did you or your Immediate Family members agree to be named a future trustee of a trust or future executor of an estate/will?	No
10.	. Are you on a global mobility assignment from USI?	No

ltem Response

11. Are you subject to the **Deloitte U.S. Firms' CPA Licensing Requirement**? No

Core | Ethics

12. I have read, understand, and agree to comply with the <u>Code of Ethics and Professional Conduct</u> (APR205), which incorporates and Agree builds on the Global Principles of Business Conduct.

13. To the best of my knowledge, I am not in violation of our <u>Code of Ethics and Professional Conduct</u>. Agree

14. I understand I am responsible for reporting actions or behavior that do not comply with our <u>Code of Ethics and Professional Conduct</u>. Agree

15. I understand that I must complete learning honestly without seeking or accepting help from other people or using artificial Agree intelligence tools. Furthermore, I will not share final assessment questions or answers with other people. Additionally, I understand that unethical course-taking behaviors violate Deloitte's <u>Code of Ethics and Professional Conduct</u> and Shared Values.

Core | Anti-Corruption, Gifts and Entertainment

16. I have read, and understand and will comply with, the Anti-Corruption policies and guidelines of the Deloitte U.S. Firms that are Agree applicable to me (e.g., APR 920 The U.S. Foreign Corrupt Practices Act of 1977 (FCPA) and Other Anti-Corruption Laws (U.S., IND, MEX & GER), APR 921 Anti-Corruption Compliance – Mexico (U.S., IND, MEX & GER)) as well as the related Anti-Corruption section of the Deloitte U.S. Firms' Code of Ethics & Professional Conduct (the "Code").

In addition, I understand and agree that I should not violate, and/or cause the Deloitte U.S. Firm to which I am assigned to violate, any Anti-Corruption laws, Anti-Corruption provisions of the Code, or any Deloitte U.S. Firms Anti-Corruption policy applicable to me. I understand that I am responsible for reporting actions or behaviors that do not comply with applicable Anti-Corruption policies and guidelines.

17. I shall not give, nor undertake to give, any meal, travel, entertainment, gift or anything else of value to any federal, state or local Agree government official or employee, (other than a Close Relative or Close Friend) unless it was pre-approved in accordance with the Administrative Policy Release APR 920 The U.S. Foreign Corrupt Practices Act.

18. I have read, and understand and agree to comply with, the Trade Compliance policies and guidelines of the Deloitte U.S. Firms (e.g., Agree APR 940 – Economic Sanctions (U.S, IND, MEX & GER) and APR 960 Export Controls Compliance (U.S., IND & MEX)).

In addition, I understand and agree that I should not violate, and/or cause the Deloitte U.S. Firm to which I am assigned to violate, any Economic Sanctions or Export Control laws or regulations, or any Deloitte U.S. Firms Trade Compliance policy applicable to me. I understand that I am responsible for reporting actions or behaviors that do not comply with applicable Trade Compliance policies and guidelines.

Core | Policy and Tools

19. I acknowledge that I have read the APRs as described in the policy and the guidance tab and understand that it is my obligation to Agree comply with the APRs.

I further acknowledge that it is my responsibility to stay informed of, and comply with, any changes to the APRs throughout my employment/association. (see link for APRs with 28 day due date).

20. I have read and understand:

<u>Independence Manual</u> (DPM 10320),

APR 420/APR 125, as applicable.

21. I understand that I am responsible for accessing and using the following tools to assess whether my Immediate Family's, and/or a Agree Close Family member's Financial Interest(s) and/or employment relationship(s) may not be permitted under independence policies:

Agree

- Deloitte Entity Search and Compliance (DESC) System
- Clients & Engagements search
- <u>Deloitte Tracking & Trading</u>
- 22. If I am in a Client-Facing role, I understand and agree that prior to serving on an engagement or providing services to a client I will use Agree the <u>Check Your Assets (CYA)</u> application to identify any potential independence conflicts.

ltem Response

Core | Confidential Information and Securities Trading

23. I agree to comply with my obligations regarding **Confidential Information**, including:

Agree

- DPM10240: Confidentiality of Client Information;
- APR 208: Electronic Communications and Systems;
- APR 223: Confidential Information and Other Vital Business Interests;
- and the <u>Code of Ethics and Professional Conduct</u>.

Further, I will not:

- Disclose Confidential Information to anyone without the legal or professional right or duty to disclose.
- Use **Confidential Information** for personal advantage, or without appropriate authorization, for the benefit of third parties.
- Backup, store or transfer <u>Confidential Information</u> to any unapproved devices or systems (e.g., unapproved cloud-based or other systems, unapproved storage devices, or personal storage sites) as prohibited by <u>APR 208: Electronic Communications</u> and <u>Systems</u>.
- **24.** I have read and complied with <u>APR 910 Privacy Policy</u> and the privacy principles included therein, and I understand the importance of **Agree** protecting <u>Personally Identifiable Information</u> as required by the Policy.
- **25.** I have read and complied with <u>APR 208: Electronic Communications and Systems</u> and re-acknowledge that pursuant to APR 208, the **Agree** U.S. Firms may access, retrieve, delete, monitor, examine, use or disclose any activity or information in the <u>Systems</u>.
- **26.** I have read and understand the <u>Deloitte U.S. Firms'</u> policies as contained in the <u>Independence Manual</u> (DPM 10320) relating to Inside **Agree** Information. [policies related to inside information]
 - will not trade in the securities of any entity when I am aware of material non-public (i.e., inside) information about such entity or its securities. Further, I will not pass along material non-public (i.e., inside) information to others, except as authorized and necessary for the conduct of business of the <u>Deloitte U.S. Firms</u>.
- 27. I agree not to purchase or sell, or direct the purchase or sale of, the <u>Securities</u> of any <u>Nonattest Client</u> during the <u>Period</u> in which I **Agree** will provide <u>Services</u> to such <u>Nonattest Client</u> per <u>DPM10240-1</u>.

Core | Business Relationships and Scope of Services

- 28. I have read, understand, and am in compliance with the Deloitte U.S. Firms' Administrative Policy Release (APR112) <u>Dealing with</u>

 Suppliers and Service Providers addressing the potential conflicts of interest that may arise for partners, principals and employees who procure goods and services on behalf of the Deloitte U.S. Firms with various suppliers and service providers.
- **29.** I have read and understand the Independence policies for Vendor Business Relationships under <u>policies related to business</u> **Agree**<u>relationships.</u>

I am not aware of any Vendor Business Relationship (VBR) which I entered into for a Deloitte U.S. Firm that is not included in the <u>TPRM Gateway</u>.

In addition, if a Vendor Business Relationship (VBR) is established with a <u>Restricted Entity</u> (and/or a person associated with an SEC Restricted Entity in a decision-making capacity at the Entity Under Audit, such as a Director, Officer, or <u>Beneficial Owner with Significant Influence</u>)

- By me on behalf of a Deloitte U.S. Firm, or
- By me or my <u>Immediate Family</u> members in a personal capacity,

Then, I will verify that each of the following criteria is satisfied:

- The relationship is as a consumer in the ordinary course of business of the <u>Restricted Entity</u>'s or its management's products or services. A relationship is considered that of "a consumer" when the products or services are acquired for personal, or internal, use or consumption. If the relationship is not as a consumer in the ordinary course of business, refer to the policies on marketplace business relationships;
- The relationship and its terms, conditions, pricing, and other requirements are similar to those that other customers in similar circumstances receive from the Restricted Entity or its management (i.e., market terms and established at arm's length);
- The relationship is not Material, individually or in the aggregate, to any of the parties and any self-interest threat created by the nature and magnitude of the relationship is at an Acceptable Level (see paragraph 4.33); and
- There is no agreement, either written or oral, that the continuation or extension of Professional Services to the Restricted Entity is dependent on the relationship with the Restricted Entity or its management.

Item Response

30. I have read and understand the Independence policies concerning direct and indirect Marketplace Business Relationships under <u>policies related to business relationships</u>.

Agree

I am not aware of any direct Marketplace Business Relationship (MBR) between a Deloitte U.S. Firm and an entity or individual, related to a client engagement or proposal in which I am involved, nor have I or my Immediate Family members entered into an MBR that is not included in the ITPRM Gateway.

In addition, I am not aware of any situation where a Deloitte U.S. Firm may have an indirect Marketplace Business Relationship or a mutuality of interest with an SEC <u>Restricted Entity</u> or with a person associated with an SEC Restricted Entity in a decision-making capacity at the Entity Under Audit, such as a Director, Officer, or <u>Beneficial Owner with Significant Influence</u>.

Core | Adversary Proceedings and Investigations

- **31.** I have read, understand, and am in compliance with the <u>Deloitte U.S. Firms</u>' Administrative Policy Release (APR102) <u>Mandatory</u> **Agree** <u>Reporting For Compliance With Periodic Reporting Requirements</u> and have timely reported my involvement in a <u>Proceeding</u>, if any, as required by such policy.
- **32.** Neither I nor a member of my <u>Immediate Family</u> am presently or have decided to become a party to an <u>adversary proceeding</u> where **Agree** a <u>Restricted Entity</u> is also a party (e.g., as a plaintiff or a defendant).

Core | Miscellaneous

- **33.** I do not have control over, or have any material interest in any Restricted Entity that is required to be <u>reported</u> to the Securities and **Agree** Exchange Commission (SEC)?
- **34.** I do not have a <u>Close Family</u> member with a <u>Financial Interest</u> in a <u>Restricted Entity</u> where the matter poses an independence issue <u>Agree</u> for me under <u>policies related to close relative financial interests</u>.

Loans | Loan Reminders & Guidance

35. Reminders and Guidance for loans reportable in Tracking & Trading
Primary Guidance - policies related to loans

Got it!

- The loans view above reflects loans you recorded in your Tracking & Trading portfolio that are held as of January 16, 2024.
- Lending relationships, including foreign loans, but excluding Consumer Loans below \$10,000, that are attributable to you, are reportable in Tracking & Trading.
- Multiple loans with the same entity (except for consumer loans with the same entity that are less than \$10,000 in aggregate) are reportable separately in your Tracking & Trading portfolio.
- Re-financed, re-negotiated, or consolidated loans are reportable instead of the original loan.
- A servicer is an entity that merely collects your payments. Report the name of the company that owns your loan, <u>not</u> the servicer.
- Review existing Tracking & Trading entries to confirm accuracy, including verification of the holding subtype recorded.

 Current entries may be incorrect or outdated.
- If you determine that your Tracking & Trading portfolio requires corrections (i.e., additions and/or deletions), make updates **prior to completing this representation** and respond to the questions below affirmatively if all entries are up-to-date. All entries into Tracking & Trading should be made with the actual date that the loan was purchased, refinanced, or reassigned.
- For *all violations of Independence policies, including those that are inadvertent*, there may be consequences in accordance with APR 105 (Expectations Concerning Independence Policies and Consequences of Noncompliance). Refer to Appendix US-3 for more information on Tracking & Trading reporting.

Loans | Mortgages

36. Do you or your <u>attributable relationship(s)</u> have a mortgage, home equity loan or an open <u>line of credit</u> secured by a <u>primary residence?</u>

No

Click here for a Tax Return Tip

37. Do you or your <u>attributable relationship(s)</u> have a mortgage, home equity loan or an open <u>line of credit</u> secured by an <u>Investment/Secondary/Rental Property?</u>
Click here for a Tax Return Tip

No

Item				
Loans Other Secured Loans				
38.	Do you or your <u>attributable relationship(s)</u> have any other secured loans?	No		
	This includes loans to finance vehicles other than automobiles/motorcycles, such as tractors, boats, aircraft or other recreational vehicles. This also includes other secured loans that were collateralized by any assets other than real estate, such as signatures loans and loans against gold.			
Loa	ns Margin Arrangements/Loans			
39.	Do you or your <u>attributable relationship(s)</u> have any <u>margin arrangements/loans</u> , even if never utilized? <u>Click here for a Tax Return Tip</u>	No		
Loa	ns Bank and Student Loans			
40.	Do you or your <u>attributable relationship(s)</u> have any student loans (including <u>PLUS loans</u>)? (Note: The scope of the question does not include Stafford loans held with the U.S. Department of Education.)	No		
41.	Do you or your <u>attributable relationship(s)</u> have any capital loans (not obtained through the Deloitte U.S. Firms), personal bank loans, <u>lines/letters of credit</u> , and/or casino markers?	No		
Loa	ns Credit Cards			
42.	Do you or your <u>attributable relationship(s)</u> have one or more <u>Consumer Loans</u> with a <u>Restricted Entity</u> that carry an outstanding balance above \$10,000 after the monthly payment due date?	No		
	(Note: Please respond No if either 1) you have a <u>Consumer Loan</u> with either a Reverse Restricted or Relationship entity, 2) if your outstanding balance is below \$10,000 after payment of the most recent monthly amount due by the stated due date, or 3) if your <u>Consumer Loan</u> is not with a Restricted entity.)			
Loa	ins Peer to Peer Loans			
43.	Do you or your <u>attributable relationship(s)</u> have any loans obtained through <u>peer-to-peer lending</u> institutions? <u>Click here for a Tax Return Tip</u>	No		
Loa	ins Leases			
44.	Do you or any of your <u>attributable relationship(s)</u> have a lease with a <u>Restricted Entity</u> , for which you are a <u>Covered Person</u> , or from a person associated with a <u>Restricted Entity</u> in a decision-making capacity at the Entity?	No		
Ins	urance Insurance Reminders & Guidance			
45.	Reminders and Guidance for insurance reportable in Tracking & Trading Primary Guidance - policies related to insurance	Got it!		
	• The Insurance view above reflects insurance products you recorded in your Tracking & Trading portfolio that are held as of			

- The Insurance view above reflects insurance products you recorded in your Tracking & Trading portfolio that are held as of January 16, 2024.
- Insurance Policies, including foreign insurance products, that are attributable to you are reportable in Tracking & Trading. For professionals based in India, this link may be useful to help understand the terms used throughout this section of the representation.
- Enter the name of the insurance company that underwrites the policy in your Tracking & Trading portfolio, not the agent or broker through which the policy was purchased.
- Insurance policies are individually reportable using the applicable subtype. For example, policies for your homeowners insurance and auto insurance are separately reportable, even if they are held with the same entity/underwriter.
- Except for variable universal life insurance, you do not need to report any group policies that do not require a health screening or individual underwriting.
- Review existing Tracking & Trading entries to confirm accuracy, including verification of the holding subtype recorded. Current entries may be incorrect or outdated.
- If you determine that your Tracking & Trading portfolio requires corrections (i.e., additions and/or deletions), make updates prior to completing this representation so that your Tracking & Trading portfolio is complete and respond to the questions below affirmatively if all entries are up-to-date. All entries in Tracking & Trading should be made with the actual date that the financial relationship was acquired or became attributable to you.
- For *all violations of Independence policies, including those that are inadvertent*, there may be consequences in accordance with APR 105 (Expectations Concerning Independence Policies and Consequences of Noncompliance). Refer to Appendix US-3 for more information on Tracking & Trading reporting.

ltem	Response
Insurance Life Insurance & Annuities	
46. Do you or your <u>attributable relationship(s)</u> have <u>term life insurance</u> ?	No
Include in your response any endowment life insurance or mortgage protection insurance policies held.	
47. Do you or your attributable relationship(s) have universal or whole life insurance?	No
48. Do you or your <u>attributable relationship(s)</u> have any <u>variable life insurance</u> or <u>annuity contracts</u> ?	No
Include in your response any Group Variable Universal Life (GVUL) and Unit Linked Insurance Plans (ULIP).	
Click here for a Tax Return Tip	
Insurance Vehicle	
 49. Do you or your attributable relationship(s) have insurance policies for any of the below vehicle types? Automobile Recreational Vehicle Motorcycle 	No
• Boat	
Aircraft	
Tractor/Equipment	
Other Vehicles	
Insurance Property	
50. Do you or your attributable relationship(s) have homeowners, renters, or umbrella insurance associated with primary, secondary	, No
rental or investment properties?	
Click here for a Tax Return Tip	
51. Do you or your <u>attributable relationship(s)</u> have any wind, earthquake, or flood insurance offered through the National Flood Insurance Program (NFIP) in excess of <u>FEMA limits</u> ?	No
52. Do you or your <u>attributable relationship(s)</u> have jewelry or collectibles insurance?	No
If this insurance policy is held with the same entity you have your homeowners policy (that is already reported), then answer "No" this question because no additional entry in Tracking & Trading is reportable.	to
Insurance Health	
53. Other than through Deloitte or another employer, do you or your <u>attributable relationship(s)</u> have any of the below types of insurance?	No
Health/medical/vision/dental	
Disability/long-term care	
Accidental death and dismemberment	
Reminder: do not include group policies offered through employment where no individual underwriting is required.	

Insurance | Business

54. Do you or your <u>attributable relationship(s)</u> have any of the below types of insurance related to a business attributable to you? **No**

Click here for a Tax Return Tip

- Business owner policy
- Business umbrella liability
- Business vehicle insurance
- Business property insurance
- Workers Compensation insurance (includes household employees)
- **55.** Do you or your <u>attributable relationship(s)</u> have any malpractice, errors & omissions (E&O), or CPA/professional liability insurance **No** policies that were not provided by Deloitte?

Do not include group policies obtained through the AICPA that did not require any individual underwriting.

ltem Response

Insurance | Other Insurance

56. Do you or your attributable relationship(s) have any of the below insurance types?

No

- Automatic life insurance policies where you did not elect to "opt-out",
- · Policies established to pay bills or debt in situations of illness or unemployment, or
- Lender-placed insurance (also known as creditor-placed or force-placed insurance)

Accounts | Account and Financial Interest Reminders & Guidance

57. Reminders and Guidance for Accounts and Financial Interests Reportable in Tracking & Trading

Got it!

- All views of your Tracking & Trading portfolio seen below reflect holdings you recorded in your Tracking & Trading portfolio that are held as of **January 16, 2024**.
- Accounts opened by others for the benefit of dependents (for example, UGMA/UTMA accounts) are attributable to you when control or custody of the assets is assumed by you or an immediate family member.
- Refer to <u>APR 420/APR 125</u> for the requirements to establish accounts with brokers that participate in the mandatory Broker Data Import Program (BDIP). **Refer to the <u>BDIP page</u> for a complete list of brokers that participate in the program.**
- Monitor recently closed accounts for residual dividends that may have been credited after the account was closed. Financial
 investment firms must re-open accounts to deposit residual dividends. These accounts must continue to be reported in
 Tracking & Trading until the final dividend has been deposited and the account is completely closed.
- Caution: Accounts for which a third party has been granted full or partial discretionary authority to buy financial interests
 without your knowledge are not permitted and put you at risk of independence and other policy violations. It is your personal
 responsibility to monitor and maintain Independence in accordance with applicable policies. All violations of Independence
 policies, including those that are inadvertent, will be subject to disciplinary action in accordance with APR 105.
- If you determine that your Tracking & Trading portfolio requires corrections (i.e., additions and/or deletions), make those updates **prior to completing this representation** so that your Tracking & Trading portfolio is complete and respond to the questions below affirmatively if all entries are up-to-date. All entries into Tracking & Trading should be made with the actual date that the financial relationship was acquired or became attributable to you.
- For *all violations of Independence policies, including those that are inadvertent*, there may be consequences in accordance with APR 105 (Expectations Concerning Independence Policies and Consequences of Noncompliance). Refer to Appendix US-3 for more information on Tracking & Trading reporting.

Accounts | Securities Accounts and 529/529A Plans

58. Do you hold <u>Securities Accounts</u>, including, but not limited to, accounts enrolled in the Broker Data Import Program (BDIP)? Typically, these types of accounts include:

No

- Brokerage accounts
- Accounts held in connection with trading apps
- Other accounts held outside the U.S. (including Demat accounts securities accounts in India)
- IRAs including Traditional, Roth, Rollover, and Simplified Employee Pensions (SEPs)
- Accounts established by an employer for holding stock options and/or Restricted Stock Units (RSUs)
- Health Savings Accounts that have an investment option purchased outside of Deloitte
- UGMA/UTMA accounts (established or controlled by you)
- Donor Advised Funds
- Mutual Fund Accounts that can be enabled in the Broker Data Import Program
- AFORES not through an employer

Click here for a Tax Return Tip

59. Do you hold any Donor Advised Funds?

No

Accounts | Mutual Fund Accounts

60. Do you or your <u>attributable relationship(s)</u> have any Mutual Fund Accounts that cannot be Broker Data Import enabled? Click here for a Tax Return Tip

No

- Exclude from your response Mutual Fund Accounts that are Broker Data Import enabled. Those accounts should be included in your responses for Securities Accounts above.
- Include in your response accounts held by your spouse/spousal equivalent, dependents, or any other attributable relationship(s).

ltem Response

Accounts | Depository Relationships

61. Are all of your attributable Depository Relationships** completely and accurately reported in your Tracking & Trading portfolio and Yes permitted under policies related to depository relationships?

• **Includes all checking, savings, salary, payment, money market, certificates of deposit, depository account with an insurance company, India post office accounts, and FDIC sweep programs.

 Depository relationships are reportable with the subtype "Depository Relationship – All Depository Accounts" within your Tracking & Trading portfolio.

Click here for a Tax Return Tip

Accounts | Separately Held Investments

62. Do you or your attributable relationship(s) hold any of the following Financial Relationships outside of a securities account or Employer Benefit Plan?

No

- Publicly traded bonds
- Publicly traded bonds
- Exchange-traded funds (ETFs)
- Publicly traded partnerships
- Real estate investment trusts (REITs)
- Unit investment trusts (UITs)

(Note: Such investments are often either directly purchased from the issuer (such as a stock certificate or bond note) or held through a transfer agent (e.g. a Dividend Reinvestment Plan (DRIP).)

Click here for a Tax Return Tip

63. Do you or your attributable relationship(s) hold any other accounts that are not reported in your Tracking & Trading portfolio, for which you are a **Covered Person**?

Νo

The following financial interests and accounts are not reportable in Tracking & Trading but require self-monitoring:

- Defined Benefit Plan such as a pension or Indian Provident Fund where you do not have ability to select investments (refer to Primary Guidance - policies related to employee benefit plans)
- Options on Indexes (refer to Primary Guidance policies related to non-diversified investments)
- Structured certificate of deposit (CD) (refer to Primary Guidance policies related to non-diversified investments) Click <u>here</u> for a tip on identifying a structured CD
- **64.** I or any of my Immediate Family Members do not have a futures account, commodity account or similar account maintained with a Agree futures commission merchant that is an SEC Restricted Entity, for which I am a Covered Person.

Other Investments | Other Investments Reminders & Guidance

65. Reminders and Guidance for Other Investments reportable in Tracking & Trading Primary Guidance - policies related to other investments

Got it!

- All views of your Tracking & Trading portfolio seen below reflect holdings you recorded in your Tracking & Trading portfolio that are held as of January 16, 2024.
- Consider all attributable Employee Benefit Plans, Digital Asset Wallet Hosting Services, and Digital Assets when completing this section.
- Employers often change the investment offerings in their plans and it is your responsibility to ensure that your Tracking & Trading portfolio has the current holdings reported at all times.
- Before starting this section, review all statements for all current/prior Employer Benefit Plans, and cross-check them against your entries in Tracking & Trading. All public and private holdings within Employer Benefit Plans are reportable in your Tracking & Trading Portfolio.
- If you determine that your Tracking & Trading portfolio requires corrections (i.e., additions and/or deletions), you should make those updates prior to completing this representation so that your Tracking & Trading portfolio is complete and respond to the questions below affirmatively if all entries are up-to-date at the time you submit this representation. All entries into Tracking & Trading should be made with the actual date that the financial relationship was acquired or became attributable to you.
- For *all violations of Independence policies, including those that are inadvertent*, there may be consequences in accordance with APR 105 (Expectations Concerning Independence Policies and Consequences of Noncompliance). Refer to Appendix US-3 for more information on Tracking & Trading reporting.

ltem Response

Other Investments | Employee Benefit Plans (EBP)

66. Do you have Employee Benefit Plan(s) with former employer(s) that has a balance as of January 16, 2024? No Click here for a Tax Return Tip

- Employers may enroll employees automatically in an Employee Benefit Plan, even when employment is part-time or temporary. You may be able to identify an employee benefit plan by checking paystubs from a prior employer, W2(s), and 1099R form(s).
- Employers may establish a securities account for their employees to hold company stock, stock options, or restricted stock units (RSU). Please disclose and enter any such accounts in the **Accounts** section of this Representation. You do not need to report the plan sponsor or plan administrator in Tracking & Trading.
- 67. Do you, your spouse/spousal equivalent, dependent(s) or any of your attributable relationship(s) hold an Employee Benefit Plan(s) No with current employer(s) (non-Deloitte)?

Click here for a Tax Return Tip

- Please discuss and confirm this with your spouse/spousal equivalent, dependents, or any other attributable relationship prior to responding to this question.
- Employers may enroll employees automatically in an Employer Benefit Plan, even when employment is part-time or temporary. You may be able to identify an employer benefit plan held by one of your attributable relationships by checking paystubs, W2(s), and 1099R form(s).
- Employers may establish a securities account for their employees to hold company stock, stock options, or restricted stock units (RSU). Please disclose and enter any such accounts in the **Accounts** section of this Representation. You do not need to report the plan sponsor or plan administrator in Tracking & Trading.

Other Investments | Private Investments and Digital Assets

68. Do you or your attributable relationship(s) hold any Private Investment(s), excluding those held through an Employee Benefit Plan? No

See Example/Hints tab below for specific examples of types of Private Investments

- 69. Do you or your attributable relationship(s) hold any <u>Digital Asset Wallet Hosting Services</u>? No
- **70.** Do you or your attributable relationship(s) own any Digital Assets? Nο

Other Investments | Co-Investments

71. I do not hold a Financial Interest in an entity in which a Restricted Entity, for which I was a Member, also co-invests, and: Agree

a. the interest is material to me or the Restricted Entity; or

b. the Restricted Entity can exercise significant influence over the entity.

Employment

72. Are you or any of your <u>Immediate</u> or <u>Close Family</u> members an employee, director/<u>officer</u>, or <u>General Counsel</u>, whether or not compensated, of a Restricted Entity as covered under policies related to employment?

Nο

Talk with all your Immediate and Close Family members to identify the names of their current employers and utilize the following two systems to check on the restriction status of each employer:

- <u>Deloitte Entity Search and Compliance (DESC) System</u>
- Clients & Engagements search

You will only need to disclose entities that appear as "Restricted" in DESC or have a "Y" attest flag in Clients & Engagements search.

Do you or any of your Family/Relatives serve on the Board of Directors of an entity traded on a U.S. exchange to which Deloitte U.S. Firms provided assurance or internal audit services under policies related to serving on the Board of Directors?

- If the parties identified are serving as directors of any publicly traded entity to which the Deloitte U.S. Firms currently provide, or have provided in the previous three calendar years, assurance or internal audit services, you should respond Yes.
- 74. I am not aware of a close personal relationship, which has not been previously reported, between myself (or other Deloitte personnel) Agree and persons employed by or associated with a Restricted Entity that has the potential to create a conflict of interest or that may impair—or appear to impair—our independence.
- 75. I will not provide Professional services to a Restricted Entity that covered a financial statement period during which I was previously Agree employed by such Restricted Entity as covered under policies related to providing services.

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Employment | Outside Employment and Activities

76. The scope of this section covers all <u>Outside Employment and Activities</u>, whether or not compensation is received and includes Got it! but is not limited to:

- 1. Engaging in an employment relationship outside of Deloitte;
- 2. Serving as an independent contractor or consultant for an entity outside of Deloitte (whether or not for compensation);
- 3. Engaging in your own business (either for-profit or a not-for-profit);
- 4. Engaging in a personal blog, writing books, screenplays, articles, etc. in my personal time that may be a Personal Work under DPM 10640 External Communications;
- 5. Volunteering at a not-for-profit organization as a board member, director, officer, or trustee; or
- 6. Engaging in other activities as defined by APR 218, Outside Employment and Activities

Considerations relating to Not-For-Profit organizations

You should disclose any position as a board member, director, <u>officer</u>, trustee or other management role of a non-profit organization, but do not include any other type of volunteer work for a non-profit organization.

Links to:

Community Involvement website

APR 110 APR 110 Donations, Political Contributions, and Sponsorships (U.S., IND & MEX)

77. If you currently participate in any of the <u>Outside Employment and Activities</u> described above, they are completely and accurately populated in the form below.

Not Applicable

(Note: If the activity has never been reported in the form below, use this <u>outside activities form</u> guidance to enter the necessary information.)

78. I have read, understand, and am in compliance with the Deloitte U.S. Firms' Administrative Policy Release (APR218) Outside

Employment and Activities addressing involvement in outside work and other activities and have obtained all applicable approvals.