



Callable Securities Disclosure

When a security is subject to a partial redemption, ETC Brokerage Services, LLC (“ETCB”) must have procedures in place to process an impartial lottery of these callable securities.

Below is a description of the impartial lottery process:

When an issuer initiates a partial call of securities, the depository holding such securities (typically, the Depository Trust & Clearing Corporation "DTCC") conducts an impartial computerized lottery using an incremental random number technique to determine the allocation of called securities to its participants (including ETCB) for which it holds securities on deposit. Because DTCC's lottery is random and impartial, in the case of a partial call, Depository Participants may or may not receive an allocation of securities selected for call.

If ETCB is notified that it received an allocation of called securities, ETCB uses an impartial lottery allocation system, in accordance with applicable rules, that randomly selects the securities within customer accounts that will be called/redeemed. The lottery determines the accounts that will be selected and the number of securities in the account that will be redeemed. The allocation of called securities is not made on a pro rata basis. Therefore, it is possible that a customer may receive a full or partial call or may not have any securities selected for call at all. Securities registered in customer name, either in transit or held in custody, are excluded from the ETCB lottery process.

For calls deemed favorable to the called parties, ETCB shall not allocate the securities to any account in which it or its associated persons have an interest until all of our other customers' positions in such securities have been satisfied. For calls deemed unfavorable to the called parties, ETCB shall include its positions and those of its associated persons in the pool of securities eligible to be called.