



Compliance Policies and Considerations

Applicable to: All GRisk employees
Effective Date: May 15, 2018

POLICY

Employees of PROFDI, Inc dba GRisk (hereafter “GRisk”, “we”, or “the Company”) who have access to Confidential Information or Material Non-Public Information (MNPI) must seek clarification and clearance with the Company’s Leadership Team and Legal Department before sharing that information with clients, sub-contractors, or any third-party that may or may not benefit, financially or otherwise, from the use and/or knowledge of such information. Questions regarding whether information is “Confidential”, “Material” or “Non-Public”, or what restrictions exist on the use or dissemination of such information should be directed to GRisk’s Leadership Team or Legal Department.

MATERIAL INFORMATION

For the purposes of this Policy, “Material Information” refers to any information that might either have an effect on the market for a security or affect an investment decision of a reasonable investor. Examples of Material Information may include, but are not limited to: government actions, major policy plans, key personnel changes, the negotiation of major contracts, proposed securities offerings, new products, and strategic plans.

NON-PUBLIC INFORMATION

Information is considered to be “Non-Public” unless it has been publicly disseminated (for example, through public filing with a securities regulatory authority, issuance of a press release, or disclosure of the information in a national or broadly disseminated news service).

COMPLIANCE CONTROLS

GRisk has put in place the following controls to ensure that our research meets the highest ethics, professional and compliance standards:

1. GRisk has appointed a designated compliance professional accountable for the Company’s compliance policies and procedures.
2. We have established recordkeeping and information control policies, and communicate such policies clearly and frequently to employees and relevant external consultants.
3. We organize regular training for our employees, as well as relevant external consultants.
4. GRisk has an editorial process to review, edit, and vet all client-facing research reports for the exclusion of information that may be deemed either confidential, or material and nonpublic.
5. Potential conflicts involving the Company’s structure or employee’s personal or financial conflicts are carefully vetted by the Company. Such potential conflicts are either adequately disclosed, or subject to walling-off procedures.
6. GRisk employees review and certify on an annual basis their agreement with the terms of our compliance policies.

7. Grisk Employees have ready access to all compliance policies, and have the ability to seek clarification from the Company's leadership team and compliance professionals.

MONITORING AND REVIEW

The effectiveness of GRisk's compliance policy and procedures is monitored by designated compliance professionals as part of the Company's regular compliance monitoring program. The policy is reviewed periodically and no less than annually, to ensure that it continues to meet latest regulatory and compliance obligations.