

Service Provider Disclosure Form

Service Provider Name: **Forefront Communications Group, Inc.**

- Is the service provider or subcontractor affiliated with a Participant, Processor, Administrator, or member of the Advisory Committee?

No

- If the service provider's or subcontractor's compensation is on a commission basis or is tied to specific metrics, provide a detailed narrative summary of how compensation is determined for performing work on behalf of the Plan.

Forefront Communications Group, Inc. (hereafter referred to as “Forefront”) is paid a flat, monthly fee for communications strategy and public relations work.

- Is the service provider or subcontractor subject to policies and procedures (including information barriers) concerning the protection of confidential information that includes affiliates?

Forefront has a confidentiality policy for all its clients. The firm does not release information without the client’s permission.

- Does the service provider or subcontractor, or its representative, have additional relationships or material economic interests that could be perceived by a reasonable objective observer to present a potential conflict of interest with its responsibilities to the Plan? If so, provide a detailed narrative discussion of all material facts necessary to identify the potential conflicts of interest and the effects they may have on the Plan.

We believe no material conflicts of interest exist today, though we will note that since September 2024, we have worked with Bakkt, a publicly traded company that remains majority-owned by ICE.

In addition, among our clients are firms that proactively involve themselves in the public discussions of financial industry matters, including the market data debates.

Finally, we may at some point enter into a relationship to perform Marketing, Branding or Content services for a Participant (note that our engagement letter prevents us from doing Communications work for any Participant).