

August 27, 2020

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Mr. Dombach.

Thank you for sending over the Securities Information Processors (SIP) Service Provider/Subcontractor Disclosure Form and the SIP Confidentiality Form. We have completed them and they are attached to this letter.

If you have any further instructions or if you require additional disclosure, please contact Rafi Reguer or me.

Thank you.

Sincerely,



Eric Soderberg
Managing Partner

Securities Information Processors (SIP) Service Provider/Subcontractor Disclosure Form

August 27, 2020

Entity: 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. (hereinafter 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 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?

Forefront is a marketing and public relations firm that specializes in the capital markets and financial technology spaces. Among the firm's clients are firms and associations that proactively involve themselves in the public discussions of financial industry matters, including the market data debates.

