



STATEMENT OF COMMITMENT TO THE FX GLOBAL CODE

The Global Foreign Exchange Business of Northern Trust (the “Institution”) has reviewed the content of the FX Global Code (“Code”) and acknowledges that the Code represents a set of principles generally recognized as good practice in the wholesale foreign exchange market (“FX Market”). The Institution confirms that it acts as a Market Participant as defined by the Code, and is committed to conducting its FX Market activities (“Activities”) in a manner consistent with the principles of the Code. To this end, the Institution has taken appropriate steps, based on the size and complexity of its Activities, and the nature of its engagement in the FX Market, to align its Activities with the principles of the Code.

A handwritten signature in black ink that reads 'John B. Turney'.

John B. Turney
The Northern Trust Company
Global Head of Foreign Exchange

05.15.18

Date