

Supplemental Disclosure Statement

Information Regarding Pre-Trade and Daily Marks for Swaps

As indicated in the General Disclosure Statement for Transactions, the Bank of New York Mellon (“BNYM”) is required to deliver to you pursuant to Section 23.431(a)(3)(i) of the rules promulgated by the CFTC a mid-market price for each swap prior to entering into such swap (the “Pre-Trade Mark”) and subsequently a daily mark for the date specified for the relevant swap pursuant to Section 23.431(d)(2) of the rules promulgated by the CFTC (the “Daily Mark”, and together with the Pre-Trade Mark, each a “Mark”) subject to the terms and conditions set forth in these notes.

Each Mark is shown from your point of view and BNYM’s estimate of the value of the swap (i) with respect to Pre-Trade Marks, under market conditions prevailing at the time the Mark is delivered, and (ii) with respect to Daily Marks, as of the close of business of the previous business day, but in each case without taking into account any amounts for profit, credit reserves, hedging, funding, liquidity and other relevant costs, reserves and adjustments that would be included in an executable price for the swap. For the avoidance of doubt, BNYM will not be required to provide a Pre-Trade Mark for certain transactions covered by CFTC no-action letters, and where you have agreed in advance, in writing, that BNYM need not disclose such Pre-Trade Mark.

The Mark for a swap is provided solely for your information and changes as a result of changes in the relevant economic markets. These changes, which can be sudden and material, can make the next Mark for the relevant swap substantially less favorable from your point of view. Further, because a Mark does not include amounts for profit, credit reserves, hedging, funding, liquidity and other relevant costs, reserves and adjustments, (i) a Pre-Trade Mark is highly likely to differ from the price at which BNYM is willing to enter into the relevant proposed swap, and (ii) a Daily Mark a) may not represent the price at which BNYM would agree to replace or terminate the relevant swap, b) may not necessarily be the value assigned to the relevant swap for purposes of the books and records of BNYM, and c) depending on the terms of the trading relationship documentation between the parties, may not represent the value assigned to the relevant swap for the purposes of computing collateral calls and returns. Accordingly, BNYM disclaims any liability for your use of the any Mark, including without limitation the use of such Mark in the preparation of your own books and records.

In the case of foreign exchange transactions, BNYM calculates its (i) Pre-Trade Marks by taking the arithmetic mean of the bid and offer and (ii) Daily Marks by generally utilizing several independent third-party rate sources, including but not limited to the WM/Reuters Intra-Day Rates, the timing of which may vary depending on booking location. In the case of an exact forward rate being unavailable, BNYM will derive the forward rate through interpolation of relevant prevailing rates to produce its Mark. While these benchmarks are generally believed to be reliable, they may not be independently verified by BNYM and are subject to change or adjustments in BNYM’s sole discretion, particularly if market or other conditions render such rates unavailable or commercially reasonable. Accordingly, BNYM reserves the right to utilize any price feeds it deems appropriate in calculating the Mark. In the case of interest rate or other derivative transactions, unless otherwise indicated BNYM determines its Marks by calculating future payment amounts or delivery values which are discounted to their present value using rates derived from a proprietary discount curve that has been developed by BNYM, while using a variety of methodologies such as Monte Carlo simulations to prepare estimated future cash flows. While BNYM is not required to disclose its proprietary methods, please reach out to your BNYM representative should you have any specific questions or concerns regarding the methodology utilized by BNYM in calculating such Marks.

Scenario Analysis

Pursuant to CFTC regulation 23.431(b), prior to entering into a swap that is not made available for trading on a designated contract market or swap execution facility, you may request and consult on the design of a scenario analysis to assess its potential exposure in connection with the swap. Such scenario analysis will include an analysis of what material assumptions would result in a significant percentage loss (e.g., 50%) of principal or notional, an explanation of the calculation methodologies used in the preparation of the scenario analysis (without disclosing

confidential or proprietary information about our models), and will consider any relevant analyses that BNYM undertakes for its own risk management purposes.

If you wish to request such a scenario analysis and to discuss the assumptions and calculation methodologies, please contact your BNYM Salesperson.

Material Conflicts of Interest

You should be aware there may be certain inherent material conflicts of interest that may arise between you and BNYM and BNYM's affiliates with respect to foreign exchange, swaps, and other transactions that you may enter into with BNYM. These conflicts of interest particularly may arise when BNYM has an economic or other incentive to persuade you to act in a manner favorable to BNYM. For example, certain business lines or BNYM affiliates, such as the wealth management division of BNY Mellon, National Association, may refer swaps incidental to their lines of business for execution with BNYM. Additionally, while it may be possible to certain products on an exchange or swap execution facility, if it is not required by CFTC regulations to trade such swaps on such facilities then BNYM may have an incentive to persuade you to execute your transaction directly with BNYM on a bilateral basis. You should also be aware that BNYM or its affiliates may have ownership interests in certain exchanges, swap execution facilities, or other various industry service providers and may accordingly have an incentive to refer you to such organizations. Finally, you should be aware that BNYM, where permitted by law, may take opposite sides of your transactions for hedging or other reasons, and that such positions may ultimately have an adverse effect on your position.