

## **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).**