



Global Privacy Policy

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Scope

The Global Privacy Policy applies generally to consumer, customer, employee, and contractor personal data, also known as personal information, received by StrataTech Holdings, LLC, Tulsa Welding School, Inc., Tulsa Welding School/Jacksonville Campus, Inc., Tulsa Welding School/Houston Campus, Inc., The Refrigeration School, Inc., and all of their affiliated and subsidiary entities (collectively "STEG", "we", "us", or "our") in any format. STEG will ensure that all personal information we handle conforms to this policy.

Our Commitment to Privacy

Your privacy is important to us at StrataTech Education Group and we are committed to safeguarding, preserving, and respecting the privacy rights of our consumers, customers, visitors, employees, and contractors. This Global Privacy policy describes how we collect, use, disclose, and secure the personal information we gather about you through tws.edu, rsi.edu, stratatech.com, ocuweld.com, strataskills.com, STEG software and applications, STEG learning platforms, or otherwise (also known as "STEG-owned or operated platforms"). It also describes the choices available to you regarding our use of your personal information and how you can access, update, or delete this information.

This Global Privacy policy does not apply to any other website maintained by other companies or organizations to which we link. STEG is not responsible for the content or activities provided on those websites.

You Consent to This Statement

By accessing, browsing, or otherwise using STEG-owned or operated platforms, you confirm that you have read, understood, and agreed with this policy. If you do not agree to this policy, you may not use STEG-owned or operated platforms.

This policy applies regardless of how STEG-owned or operated platforms are accessed and will cover any technologies or devices by which STEG makes these available to you.

If you have any questions or concerns about our personal information policies or practices, you can contact us in the methods described in the "**How to Contact Us**" section on page 5 of this document.

The Information We Collect and How We Use It

We collect the information you voluntarily provide directly to us, such as when you complete a form or submit information to us. We also collect information when you interact with STEG-owned or operated platforms, for example, through our use of cookies.

Information You Provide

- *Completing Forms on STEG-owned or operated platforms.* If you request to receive information by submitting any STEG contact form, we may ask you to provide information such as your name, email address, mailing address, telephone number, graduation year, or military enlistment status.
- *Contacting Us.* If you send us an email, we will collect your email address and any information that you provide in the email. Similarly, if you use our "live chat" feature, we will collect the information you provide us in the live chat. If you contact us through SMS, we will collect device information, the phone number used to contact us, and any information you provide. If you contact us by phone, we will collect the phone number used to contact us, and any information you provide during the call. Calls may be recorded for quality assurance or training purposes.
- *Submitting Employment Applications.* If you submit an application for employment, we collect the information you provide as part of the application process.
- *Employment.* If you are employed by STEG, we may collect information during the course of your employment including, but not limited to, biometric data, employment history, past and current job performance, personal health information, and information required by state and federal regulators.



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- *Social Media.* If you interact with STEG-owned or operated platforms by sharing on a social media platform, we may collect information that you post. Please note that your comments will be visible to the public, so you should never share personal information that you would like to keep private.
- *Software & Applications.* If you download or install any STEG-owned or operated software or applications, we may collect information that you share during the installation and setup process, and/or during use of the software or application (see appendices for specific software or application descriptions).
- *Surveys.* Dependent on your relationship with STEG, we may request information via surveys. For non-students, participation in these surveys is completely voluntary, and you may choose whether or not to participate and therefore disclose information. Information requested may include, but is not limited to, contact information and demographic information.

Information We Collect as You Navigate STEG-owned or operated platforms

We automatically collect certain information as you use STEG-owned or operated platforms, such as the following:

- *Usage Information.* We may collect information automatically through your use of STEG-owned or operated platforms, such as which of the pages you access, the frequency of access, and what you click on while on STEG-owned or operated platforms.
- *Device Information.* We may collect information about the device you are using, such as hardware model, operating system, application version number, browser, and IP addresses.
- *Mobile Device Information.* In addition to the Device Information listed above, when you access STEG-owned or operated platforms via a browser on your mobile device, we may collect mobile network information, including telephone number, the unique device identifier assigned to that device, mobile carrier, operating system, and other device attributes.
- *Location Information.* We may collect information about your actual location which may be determined from GPS and other sensors that may reveal information on or nearby devices, Wi-Fi access points, and cell towers.

How Do We Use "Cookies" and Other Tracking Technologies?

We use "Cookies" and other Web technologies to collect information and support certain features of our Sites. We may send one or more Cookies to your computer or other device. We also use other similar technologies such as tracking pixels, tags, or similar tools when you visit STEG-owned or operated platforms. These technologies can collect data regarding your operating system, browser type, device type, screen resolution, IP address, and other technical information, as well as navigation events and session information as you interact with STEG-owned or operated platforms. This information allows us to understand how you use STEG-owned or operated platforms.

What Are Cookies?

Cookies are small files created by websites, including STEG-owned or operated platforms, that reside on your device's storage and that store information about your use of a particular website. When you access STEG-owned or operated platforms, we use Cookies and other tracking technologies to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize STEG-owned or operated platforms according to your individual needs;
- Contact you to provide you with information or services that you request from us;
- Advertise new content, events, and services that relate to your interests;
- Provide you with more personalized content that is most relevant to your interest areas; and
- Recognize when you return to STEG-owned or operated platforms.



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We set some Cookies ourselves and others are set by third parties. You can manage your Cookies preference as described in the **"Managing Your Cookies"** section below.

What Types of Cookies Do We Use and Why?

These are the different types of Cookies that we and our service providers use on STEG-owned or operated platforms:

- *Essential Cookies.* These Cookies are required for the operation of STEG-owned or operated platforms and enable you to move around STEG-owned or operated platforms and use its features. Disabling these Cookies can negatively impact STEG-owned or operated platforms performance.
- *Analytics, Performance and Research Cookies.* These Cookies allow us to analyze activities on STEG-owned or operated platforms. They can be used to improve the functioning of STEG-owned or operated platforms. For example, these Cookies recognize and count the number of visitors and see how they move around STEG-owned or operated platforms. Analytics Cookies also help us measure the performance of our advertising campaigns to help us improve them and to optimize STEG-owned or operated platforms content for those who engage with our advertising.
- *Functionality Cookies.* These Cookies are used to recognize you when you return to STEG-owned or operated platforms. This enables us to personalize content for you and remember your preferences.
- *Social Networking Cookies.* These Cookies are used to enable you to share pages and content that you find interesting on STEG-owned or operated platforms through third-party social networking and other websites. These Cookies may also be used for marketing and/or communication purposes.

How Long Do Cookies Stay on My Device?

Some Cookies operate from the time you visit STEG-owned or operated platforms until the end of that particular browsing session. These Cookies, which are called "session cookies," expire and are automatically deleted when you close your Internet browser.

Some Cookies will stay on your device between browsing sessions and will not expire or automatically delete when you close your Internet browser. These Cookies are called "Persistent Cookies" and the length of time they will remain on your device will vary from Cookie to Cookie. Persistent Cookies are used for a number of purposes, such as storing your preferences so that they are available for your next visit and to keep a more accurate account of how often you visit STEG-owned or operated platforms, how your use of STEG-owned or operated platforms may change over time, and the effectiveness of advertising efforts.

Managing Your Cookies

It may be possible to block Cookies by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of STEG-owned or operated platforms.

You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org.

Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with STEG-owned or operated platforms, compile reports on STEG-owned or operated platforms activity, and provide other services related to website activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, [click here](#).

We also use Google Remarketing features to collect data about visitors to STEG-owned or operated platforms to, among other things, deliver advertising content on sites across the Internet in a manner that is specifically directed toward the interests expressed by the visitors while on STEG-owned or operated platforms. Google uses Cookies to serve ads based on someone's past visits to STEG-owned or operated platforms. You can opt-out of Google's use of Cookies to serve ads based on your past visits to STEG-owned or operated platforms via the following link: [Google Ad Settings](#).



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Do STEG-owned or operated platforms Respond to "Do Not Track" Signals?

There is currently no industry agreed-upon response to a Do Not Track signal. At this time, STEG-owned or operated platforms do not respond differently based on a user's Do Not Track signal.

How We Use the Personal Information

We use personal information we collect about you or that you provide to us in the following ways:

- To present STEG-owned or operated platforms and its contents in a suitable and effective manner for you and your device;
- To provide you with information or services that you request from us or that we think may be of interest to you;
- To facilitate transactions;
- To communicate and advertise products and/or services that we think may be of interest to you;
- To send you our newsletter and/or invite you to attend our events;
- To provide customer support, troubleshoot issues, manage accounts, and respond to requests, questions, or comments;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us; and
- To notify you about any updates, additions, deletions, upgrades, or changes in our products and/or services.

How We Share the Personal Information We Collect

STEG may share your personal information:

- With third parties who perform data services on our behalf (e.g., hosting, maintenance, backup, analysis, etc.). Any such third parties will be under an obligation to us to maintain the confidentiality of your personal information;
- To third-party service providers to prepare, deploy, and analyze our audience, marketing, and promotional content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information;
- We disclose your information when we, in good faith, believe disclosure is appropriate to comply with the reporting requirements of accrediting bodies, various States offices, or the U.S. Department of Education, or to comply with the law, a court order, or a subpoena;
- To any third parties as part of any business or asset sale;
- In the event of bankruptcy, as part of a sale in connection with reorganization or liquidation proceedings; and
- To any other person or entity where you consent to the disclosure.



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Learning Platforms

Content You Submit via Various Learning Platforms. As a STEG student, you may be expected to generate original content and submit that content for evaluation by your instructor through one or more learning platforms. The assignments you submit may be accessible to other non-STEG employed persons (e.g., your classmates). You should understand that if you post content in a learning platform in a manner accessible to other non-STEG employed persons, it may be more widely disseminated. As on any STEG-owned or operated platforms, the content you submit to a learning platform must comply with any other applicable policies, such as the student code of conduct.

STEG's Use of Content You Submit to a Learning Platform. STEG uses the content you submit to any of our learning platforms primarily to evaluate your performance in a particular course and to assign you a grade. In addition, feedback you submit during the course and the instructor evaluation you submit at the end of a course may be used to improve the course and other STEG products, programs, and services. STEG may also use information available through its learning platforms for academic advising purposes and advisories. If you perform poorly in a particular course, STEG may use information available through its learning platforms to refer you to tutoring or other appropriate support services. However, STEG will not use in any public advertising or promotional campaign content you post to its learning platforms solely for purposes of fulfilling a course requirement.

How to Contact Us

If you have any questions, comments, or concerns regarding our personal information policies or practices, require our Global Privacy policy in an alternative format, or need to file a data deletion request, you can contact us through:

- Phone by calling us at (602) 336-7118;
- Email by emailing our Compliance Department at compliance@stratatech.com; or
- Written correspondence directed to:
StrataTech Education Group
Care of: Compliance Dept.
120 N 44th St #230
Phoenix, AZ 85034



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California Privacy Rights

If you are a California user, you have certain rights with respect to the collection, use, transfer, and processing of you "Personal Information," as defined by the California Consumer Privacy Act ("CCPA") and its subsequent amendments. We reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others. To exercise any of the rights below, please contact us via the contact information below. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information.

What Information Do We Collect?

Cal. Civ. Code. § 1798.140(0) defines the following categories of Personal Information:

Category ¹	Examples
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security Number (SSN), physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.
C. Protected Classification Characteristics Under California or Federal Law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
F. Internet or Other Similar Network Activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
G. Geolocation data	Physical location or movements.
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.
I. Professional or Employment - related Information	Current or past job history or performance evaluations.
J. Non-Public Education Information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.



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K. Inferences Drawn from the Consumer

Inferences drawn from Personal Information identified above to create a profile about a consumer reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

¹ Categories of Personal Information are as defined in *Cal. Civ. Code, § 1798.140(0)*

The above examples are illustrative examples from the CCPA and do not reflect the specific pieces of information we collect.

Sources from Which Personal Information is Collected

We collect your personal information in categories A (identifiers), B (personal), C (protected classifications), D (commercial), E (biometric information), H (sensory), I (professional or employment-related information), and J (non-public education information) directly from you. We collect the personal information in category D (commercial) by keeping a log of your transactions. We collect the personal information in categories F (internet), G (geolocation), J (non-public education information), and K (inferences) based on your interactions with STEG-owned or operated platforms (including applications).

Business or Commercial Purposes for Which Personal Information is Collected

Your Personal Information is used for the following purposes:

- To provide educational services;
- To provide the information, products, and services you request;
- To provide you with customer support and respond to your communications;
- To personalize your experience on STEG-owned or operated platforms or applications;
- To improve the content, functionality, and usability of STEG-owned or operated platforms;
- To better understand your needs and interests;
- To send you information relating to other programs, services, or products that we believe may be of interest to you;
- To contact you with information and notices related to your use of STEG-owned or operated platforms;
- To invite you to participate in surveys and provide feedback to us (in accordance with any privacy preferences you have expressed to us);
- To improve our products and services;
- To improve our marketing and promotional efforts;
- For security, credit, or fraud prevention purposes; and/or
- To comply with legal obligations.

Third Parties with Whom Personal Information is Shared

STEG discloses the following Personal Information about consumers for business purposes:

- We share Personal Information in categories: A (identifiers), B (personal), D (commercial), F (internet), G (geolocation), and K (inferences) with third party service providers, benefits providers, transaction processors, and advertising providers.
- We may share content posted on our social media platforms with other consumers (e.g., through a retweet or by sharing a consumer "comment" on a story). Such posts may include Personal Information in categories A (identifiers) and B (personal), but the content depends on each individual post.



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- We allow certain companies to use Personal Information in categories F (internet), G (geolocation) and K (inferences) to enhance online experiences and customize advertising.
- We disclose your Personal Information in categories A (identifiers), B (personal), and J (educational) when we, in good faith, believe disclosure is appropriate to comply with the reporting requirements of accrediting bodies, State offices, or the U.S. Department of Education or to comply with the law, a court order, or a subpoena. The categories of Personal Information shared for this purpose may change depending on the nature of the law, court order, or subpoena.

STEG does not sell your Personal Information.

Individual Rights

Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that STEG disclose the Personal Information it collects, uses, and discloses about you to third parties. There are two types of Rights to Know requests that you can make:

- A. Right to Know (Abbreviated Request):** If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
- Categories of Personal Information collected;
 - Categories of sources from which Personal Information is collected;
 - Business purpose for collecting; and
 - Categories of third parties with whom they were shared.
- B. Right to Know (Specific Pieces of Information Request):** If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
- Specific pieces of Personal Information collected about you.

This information will be provided to you free of charge, unless STEG determines that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

There are certain exceptions to a consumer's Right to Know. STEG will state in its response if an exception applies.

Right of Deletion

You have the right to request that STEG and our service providers delete any Personal Information about yourself which STEG has collected from you upon receipt of a verifiable request. This right is subject to certain exceptions. STEG will state in its response if an exception applies.

Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your Personal Information by a business subject to certain laws and regulations.

STEG does not, and will not, sell any personal information of California consumers. STEG will update this Statement and comply with applicable laws and regulations in the event that it sells personal information of California consumers in the future.

Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising the privacy rights conferred by California law. STEG will not discriminate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.



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Submitting Requests

You can submit your request by calling us at (602) 490-3450 ext. 118. You may also submit a request by email at compliance@stratatech.com or by mail at:

StrataTech Education Group
Care of: Compliance Department
120 N 44th St #230
Phoenix, AZ 85034

Verifying Requests

When STEG receives a request, it must verify that the person requesting information or deletion is the California consumer about whom the request relates in order to process the request. To verify a California consumer's identity, we may request up to three pieces of Personal Information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the consumer whose personal information is the subject of the request.

Making a verifiable consumer request does not require you to create an account with us.

We will only use Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. STEG reserves the right to take additional steps as necessary to verify the identity of California consumers where we have reason to believe a request is fraudulent.

Authorized Agents

You may choose a person registered with the California Secretary of State that you authorize to act on your behalf to submit your requests ("Authorized Agent"). If you choose to use an Authorized Agent, STEG requires that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with STEG. Failure to do so may result in STEG denying your request.

Contact for More Information

If you have any questions or concerns regarding your California Privacy Rights under this Privacy Policy, please feel free to contact us at (602) 336-7118 or send us an email at compliance@stratatech.com.



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Third-Party Links

STEG-owned or operated platforms may contain links to third-party websites. When STEG provides links, it does so only as a convenience and does not endorse any products or services and is not responsible for any content of any third-party website or any links contained within. It is important to note that this Notice only applies to STEG-owned or operated platforms. We are not responsible and assume no responsibility for any personal information collected, stored, or used by any third party as a result of you visiting their website or platform.

Unsubscribe from Email Communications

If you no longer wish to receive certain email communications from us, please click on the UNSUBSCRIBE link contained within any email from us delivered through subscription. Please note that even if you unsubscribe, we may still need to contact you regarding certain issues.

SMS Terms and Conditions

We will only text you if you opt in to receive text messages. You can opt out at any time.

To stop receiving SMS messages from STEG, reply STOP to any SMS message received from us. To unsubscribe, you'll receive 1 final text confirming you have been unsubscribed in our system. You won't get any other text messages unless you reactivate your subscription.

As always, message and data rates may apply for any messages sent to you from us and to us from you. If you have any questions about your text plan or data plan, contact your wireless provider.

Our Commitment to Data Security

The security of your personal information is important to us. We take various reasonable organizational and technical measures to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction. We have policies and procedures in place to ensure that STEG employees, contractors, and non-affiliated third parties know what is expected of them in relation to the handling and disposition of personal information. We have in place appropriate procedures for accessing our system and access is limited by role. We have also put processes in place to address suspected breaches of your personal information. If required by law to do so, we will notify you and/or the relevant supervisory authority in the event of a data breach.

We retain personal information about you for as long as necessary to provide you with our services. In some cases, we retain personal information for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable laws, rules, or regulations.

Our Commitment to Children's Privacy

Protecting the privacy of the very young is especially important. STEG-owned or operated platforms are not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. In the event that we learn that we have collected personal information from a child under age 13 without verification or parental consent, we will immediately delete that information. If you believe that we might have any information from or about a child under 13, please contact us using the information provided in the "**How to Contact Us**" section on page 5.

Changes to This Privacy Policy

The Global Privacy policy will be revised and updated as needed to remain current and relevant to technological and software/service updates as well as regulatory requirements. We will post any changes in the revision history of the document.



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Appendices

Appendix A: OcuWeld™ Software Privacy Policy Addendum

What Data Does the OcuWeld™ Application Collect

As part of the setup process for the application, STEG collects profile information, such as the student's name and login credentials (categories A and B under CCPA definitions).

Through use of the application, STEG collects performance criteria, such as scores or badges earned per lesson, total time spent per lesson or step thereof, guidance level used, and the time and date of lesson completion (category J under CCPA definition).

How Does STEG Use This Data

STEG utilizes profile information to determine your enrollment status, and for your instructor to identify you in the associated Learning Management System (LMS) entries. Performance criteria are utilized by your instructor to track your progress as a student as you complete specific courses.

Where is OcuWeld™ Application Data Stored

The OcuWeld™ application stores data locally during a session and, if granted user permission, stores user data in-between sessions in the application cache. Additionally, if granted user permission data may be stored in STEG's LMS. This system is hosted by a specific provider and utilizes geographically distributed cloud-based resources as part of the service delivery model.

Data Deletion

User generated data is stored locally in the application folder and is deleted during the uninstallation process for the application. If user permission was granted, data is also stored in STEG's LMS. Please contact us by the methods described under "How to Contact Us" on page 5 of this document to complete a data deletion request for application data stored on the LMS.



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Revision History

Current version supersedes all previous versions.

Ver.	Effective Date	Author	Reason for Change	Training Requirements
Current Version				
04.00	06-01-2023	Cameron Bell, Compliance Coordinator	Annual policy revision. Update formatting and error correction throughout the document.	N/A
Previous Versions				
03.00	06-03-2022	Cameron Bell, Compliance Coordinator	Added application specific appendices and updated privacy commitment, consent, information collected, contact us, and CCPA information sources collected.	N/A
02.00	01-21-2022	Cameron Bell, Compliance Coordinator	Updated document name, formatting, terminology, scope, commitment to privacy, cookies usage, information collected, and information usage.	N/A
01.00	05-01-2021	Cameron Bell, Compliance Coordinator	Initial document publication.	N/A



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Signature Page

Role	Author
Signature	<i>Cameron Bell</i>
Title	Compliance Coordinator
Department	Compliance
Signature Date	May 30, 2023
Supporting Statement	I approve this document as written.

Role	Approver
Signature	<i>Greg Kosulung</i>
Title	Sr. Vice President of Information Technology
Department	Compliance
Signature Date	May 30, 2023
Supporting Statement	I approve this document as written.

Role	Approver
Signature	<i>[Signature]</i>
Title	Sr. Vice President of Compliance
Department	Compliance
Signature Date	May 30, 2023
Supporting Statement	I approve this document as written.

Role	Approver
Signature	<i>Mary Kelly</i>
Title	President & Chief Executive Officer
Department	Operations
Signature Date	May 30, 2023
Supporting Statement	I approve this document as written.

Role	Compliance Reviewer
Signature	<i>Pamela Oliver</i>
Title	Sr. Director
Department	Compliance
Signature Date	May 30, 2023
Supporting Statement	I approve this document as written.