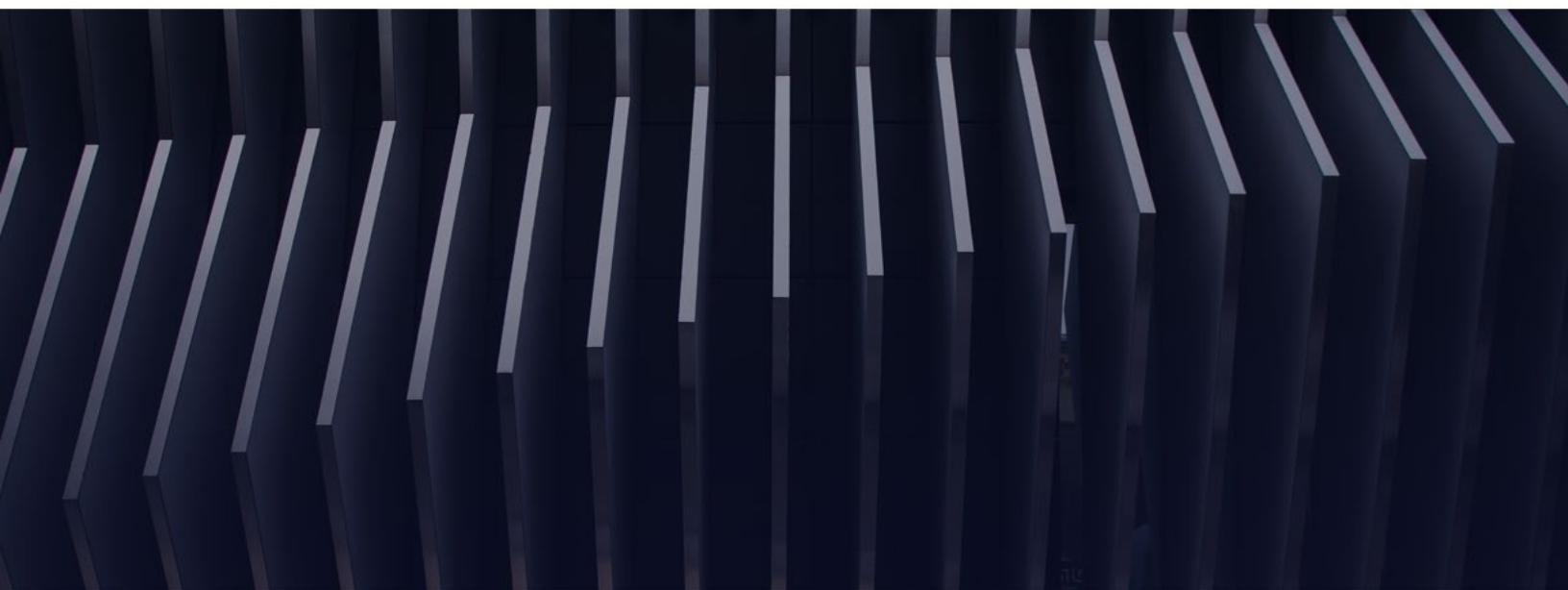


Wilshire Indexes

Wilshire OpCo UK Limited Conflicts of Interest Management

December 2025



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Introduction

Wilshire Indexes¹ provides benchmarks² and analytics to asset owners, investment managers, trading desks and investment consultants. Wilshire OpCo UK Limited is the UK entity of Wilshire Indexes. Wilshire OpCo UK Limited is authorised by the UK Financial Conduct Authority as a benchmark administrator under the UK Benchmark Regulation (**UK BMR**). It is a wholly owned subsidiary of Wilshire Benchmarks TopCo Limited.

This document outlines the steps Wilshire OpCo UK Limited takes to identify and to prevent or manage conflicts of interest.

1 Identification of conflicts of interest

Wilshire OpCo UK Limited has policies and procedures in place to identify potential conflicts of interest. Any declared or identified conflict of interest is recorded in a register and is reviewed in accordance with Wilshire OpCo UK Limited's policies, procedures and governance framework, annually or more frequently if a new potential conflict of interest arises.

2 Potential conflicts of interest

Conflicts of interest may arise from different areas and parties including the following.

2.1 Group and ownership structures

Wilshire OpCo UK Limited is a wholly owned subsidiary of Wilshire Benchmarks TopCo Limited and is part of the Wilshire Advisors group of companies. As a benchmark administrator, Wilshire OpCo UK Limited has in place robust governance arrangements which include a clear organisational structure.³ Wilshire OpCo UK Limited has in place a framework to identify and to prevent or manage conflicts of interest and to ensure that, where any judgement or discretion in the benchmark determination process is required, it is independently and honestly exercised⁴.

2.2 Employees

Employees are subject to policies as part of the Wilshire OpCo UK Limited governance framework with address potential conflicts of interest. These include:

- Code of ethics
- Conflicts of interest policy
- Market abuse policy
- Personal account dealing policy
- Anti-bribery and corruption policy
- Whistleblowing

Employees are required to certify they have adhered to these policies on an annual basis.

2.3 Directors

The Wilshire OpCo UK Limited board of directors is comprised of executive and non-executive directors. All directors are subject to the duty to avoid conflicts of interest set out in section 175 of the Companies Act 2006. All directors are subject to the Wilshire OpCo UK Limited Conflicts of Interest – Directors' Declarations policy. In addition, executive directors are subject to the policies applicable to employees set out in section 2.2 above.

¹ Wilshire Indexes is the trading name of Wilshire Benchmarks TopCo Limited and its subsidiary companies, including Wilshire OpCo UK Limited

² The term "benchmark" is used in this document as defined in the EU Benchmark Regulation (2016/1011) which forms part of UK law by virtue of the European (Withdrawal) Act 2018 (UK BMR).

³ [Wilshire OpCo UK Limited Governance Framework](#)

⁴ [Wilshire Indexes Policy for the Exercise of Expert Judgement](#)

2.4 Third parties including commercial partners/suppliers/clients

All benchmarks administered in accordance with UK BMR are maintained according to policies⁵ that apply to all indexes that select their constituents from a particular asset class. These policies supplement the methodology documentation⁶ for individual indexes and should be read in conjunction with those methodology documents.

2.5 Design and operation of a benchmark

Benchmarks administered in accordance with UK BMR are determined in accordance with published methodologies which are supplemented by published index policies. The determination and dissemination of Wilshire OpCo UK Limited's benchmarks is overseen by the various bodies within the governance framework.

3 Management of conflicts of interest

If a potential conflict of interest is identified or disclosed, Wilshire OpCo UK Limited considers the steps appropriate to manage the potential conflict of interest. The Wilshire OpCo UK Limited conflicts of interest register contains the mitigating controls identified to manage any potential conflict of interest.

Taking into account the application of these controls together with the conflicts of interest policies and procedures and the governance framework, Wilshire OpCo UK Limited does not consider there to be any residual material conflicts of interest.

Document Approval

This document was approved by the Wilshire Indexes Executive Committee on 2 December 2025.

⁵ [FT Wilshire Index Series - Regulatory Information](#)

⁶ [FT Wilshire Index Series - All Methodologies](#)

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Contact Us

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About Wilshire Indexes

Wilshire Indexes provides institutional investors, asset managers and retail intermediaries with a global benchmark platform that offers global coverage of the markets through the leading FT Wilshire Index Series.

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