

STATEMENT OF COMMITMENT TO THE FX GLOBAL CODE

The Bank of New York Mellon ("Bank") 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 Bank confirms that it acts as a Market Participant as defined by the Code, and is committed to conducting its FX Market Activities ("Activities") (excluding the Investment Management businesses operating out of the Bank) in a manner consistent with the principles of the Code. To this end, the Bank 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.

The Bank of New York Mellon

Signed: _

Adam Vos, Global Head of Foreign Exchange

Date: 21st May 2018