

INVESCO FUNDS ANTICIPATED TO BEGIN TRADING ON NASDAQ ON DECEMBER 31, 2019

EXCHANGE-TRADED FUND	SYMBOL	CUSIP #
Invesco BulletShares 2020 Corporate Bond ETF	BCK	46138J502
Invesco BulletShares 2021 Corporate Bond ETF	BCL	46138J700
Invesco BulletShares 2022 Corporate Bond ETF	BCLM	46138J882
Invesco BulletShares 2023 Corporate Bond ETF	BCLN	46138J866
Invesco BulletShares 2024 Corporate Bond ETF	BCLC	46138J841
Invesco BulletShares 2025 Corporate Bond ETF	BCLP	46138J825
Invesco BulletShares 2026 Corporate Bond ETF	BCLQ	46138J791
Invesco BulletShares 2027 Corporate Bond ETF	BCLR	46138J783
Invesco BulletShares 2028 Corporate Bond ETF	BCLS	46138J643
Invesco BulletShares 2029 Corporate Bond ETF	BCLT	46138J577
Invesco BulletShares 2020 High Yield Corporate Bond ETF	BHCK	46138J601
Invesco BulletShares 2021 High Yield Corporate Bond ETF	BHCL	46138J809
Invesco BulletShares 2022 High Yield Corporate Bond ETF	BHCLM	46138J874
Invesco BulletShares 2023 High Yield Corporate Bond ETF	BHCLN	46138J858
Invesco BulletShares 2024 High Yield Corporate Bond ETF	BHCLC	46138J833
Invesco BulletShares 2025 High Yield Corporate Bond ETF	BHCLP	46138J817
Invesco BulletShares 2026 High Yield Corporate Bond ETF	BHCLQ	46138J635
Invesco BulletShares 2027 High Yield Corporate Bond ETF	BHCLR	46138J585
Invesco BulletShares 2021 USD Emerging Markets Debt ETF	BEMC	46138J684
Invesco BulletShares 2022 USD Emerging Markets Debt ETF	BEMCL	46138J676
Invesco BulletShares 2023 USD Emerging Markets Debt ETF	BEMCLM	46138J668
Invesco BulletShares 2024 USD Emerging Markets Debt ETF	BEMCLC	46138J650

BACK GROUND INFORMATION ON THE FUND

Invesco Exchange-Traded Self-Indexed Fund Trust (the “Trust”) is a management investment company registered under the Investment Company Act of 1940, as amended (the “1940 Act”). The Trust consists of separate exchange-traded funds (each, a “Fund”). This circular refers only to the Funds listed above. The shares of the Funds are referred to herein as “Shares.” Invesco Capital Management LLC (the “Adviser”) serves as the investment adviser for the Funds.

BCK seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2020 Index (the “Index”). BCK’s investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, “effective maturities” in the year 2020.

BCL seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2021 Index (the “Index”). BCL’s investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, “effective maturities” in the year 2021.

BSCM seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2022 Index (the "Index"). BSCM's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2022.

BSCN seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2023 Index (the "Index"). BSCN's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2023.

BSCO seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2024 Index (the "Index"). BSCO's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2024.

BSCP seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2025 Index (the "Index"). BSCP's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2025.

BSCQ seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2026 Index (the "Index"). BSCQ's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2026.

BSCR seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2027 Index (the "Index"). BSCR's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2027.

BSCS seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2028 Index (the "Index"). BSCS's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2028.

B SCT seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Corporate Bond 2029 Index (the "Index"). B SCT's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated investment grade corporate bonds with maturities or, in some cases, "effective maturities" in the year 2029.

BSJK seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2020 Index (the "Index"). BSJK's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2020.

B SAE seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Emerging Markets Debt 2021 Index (the "Index"). B SAE's investment objective and the Index may be changed without shareholder approval. The Index will typically include between 20-400 securities and is designed to represent the performance of a held-to-maturity portfolio of U.S. dollar-denominated emerging markets bonds with maturities or, in some cases, "effective maturities" in the year 2021.

BSBE seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Emerging Markets Debt 2022 Index (the "Index"). BSBE's investment objective and the Index may be changed without shareholder approval. The Index will typically include between 20-400 securities and is designed to represent the performance of a held-to-maturity portfolio of U.S. dollar-denominated emerging markets bonds with maturities or, in some cases, "effective maturities" in the year 2022.

BSCE seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Emerging Markets Debt 2023 Index (the "Index"). BSCE's investment objective and the Index may be changed without shareholder approval. The Index will typically include between 20-400 securities and is designed to represent the performance of a held-to-maturity portfolio of U.S. dollar-denominated emerging markets bonds with maturities or, in some cases, "effective maturities" in the year 2023.

BSDE seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD Emerging Markets Debt 2024 Index (the "Index"). BSDE's investment objective and the Index may be changed without shareholder approval. The Index will typically include between 20-400 securities and is designed to represent the performance of a held-to-maturity portfolio of U.S. dollar-denominated emerging markets bonds with maturities or, in some cases, "effective maturities" in the year 2024.

BSJL seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2021 Index (the "Index"). BSJL's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2021.

BSJM seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2022 Index (the "Index"). BSJM's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2022.

BSJN seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2023 Index (the "Index"). BSJN's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2023.

BSJO seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2024 Index (the "Index"). BSJO's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2024.

BSJP seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2025 Index (the "Index"). BSJP's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2025.

BSJQ seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2026 Index (the "Index"). BSJQ's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2026.

BSJR seeks investment results that correspond generally to the price and yield performance, before fees and expenses, of Nasdaq BulletShares USD High Yield Corporate Bond 2027 Index (the "Index"). BSJR's investment objective and the Index may be changed without shareholder approval. The Index seeks to measure the performance of a portfolio of U.S. dollar-denominated high yield corporate bonds (commonly known as "junk bonds") with maturities or, in some cases, "effective maturities" in the year 2027.

For more information regarding the Funds' investment strategy, please read the prospectus for the Funds.

As described more fully in the Trust's prospectus and Statement of Additional Information ("SAI"), the Funds issue and redeem Shares at net asset value ("NAV") only in large blocks of shares, respectively, (each block of Shares called a "Creation Unit") or multiples thereof (typically 20,000 to 100,000 Shares). As a practical matter, only broker-dealers or large institutional investors with creation and redemption agreements (called Authorized Participants) can purchase or redeem these Creation Units. Except when aggregated in Creation Units, the Shares may not be redeemed with the Funds.

Dividends from net investment income, if any, are declared and paid monthly by the Funds. Distributions of net realized securities gains, if any, generally are declared and paid annually.

Shares are held in book-entry form, which means that no share certificates are issued. The Depository Trust Company or its nominee is the record owner of all outstanding Shares and is recognized as the owner of all Shares for all purposes.

The NAV of the Fund is generally determined as of the close of trading (normally 4:00 p.m., Eastern time) on each day the New York Stock Exchange is open for business. The NAV of the Funds are calculated by dividing the value of the net assets of each Fund (i.e., the value of its total assets less total liabilities) by the total number of outstanding shares of each Fund, generally rounded to the nearest cent.

The registration statement for the Funds describes the various fees and expenses for the Shares. For a more complete description of the Funds and the underlying indexes, visit the Funds' website at www.invesco.com/ETFs.

PURCHASES AND REDEMPTIONS IN CREATION UNIT SIZE

Nasdaq members are hereby informed that procedures for purchases and redemptions of Shares in Creation Unit Size are described in the Trust's prospectus and SAI, and that Shares are not individually redeemable but are redeemable only in Creation Unit Size aggregations or multiples thereof.

CONTINUOUS OFFERING

The method by which Creation Unit Aggregations of shares are created and traded may raise certain issues under applicable securities laws. Because new Creation Unit Aggregations of shares are issued and sold by the Funds on an ongoing basis, at any point a "distribution," as such term is used in the Securities Act, may occur. Broker-dealers and other persons are cautioned that some activities on their part may, depending on the circumstances, result in their being deemed participants in a distribution in a manner which could render them statutory underwriters and subject them to the prospectus delivery requirement and liability provisions of the Securities Act.

For example, a broker-dealer firm or its client may be deemed a statutory underwriter if it takes Creation Unit Aggregations after placing an order with the Distributor, breaks them down into constituent shares, and sells such shares directly to customers, or if it chooses to couple the creation of a supply of new shares with an active selling effort involving solicitation of secondary market demand for shares. A determination of whether one is an underwriter for purposes of the Securities Act must take into account all the facts and circumstances pertaining to the activities of the broker-dealer or its client in the particular case, and the examples mentioned above should not be considered a complete description of all the activities that could lead to a categorization as an underwriter.

Broker-dealer firms should also note that dealers who are not "underwriters" but are effecting transactions in shares, whether or not participating in the distribution of shares, generally are required to deliver a prospectus. This is because the prospectus delivery exemption in Section 4(3) of the Securities Act is not available in respect of such transactions as a result of Section 24(d) of the 1940 Act. Firms that incur a prospectus delivery obligation with respect to shares of the Funds are reminded that, pursuant to Rule 153 under the Securities Act, a prospectus delivery obligation under Section 5(b)(2) of the Securities Act owed to an

exchange member in connection with a sale on the Listing Exchange is satisfied by the fact that the prospectus is available at the Listing Exchange upon request. The prospectus delivery mechanism provided in Rule 153 is only available with respect to transactions on an exchange.

PRINCIPAL RISKS

Interested persons are referred to the discussion in the prospectus for each Fund of the principal risks of an investment in each Fund. These may include, but are not limited to, Authorized Participant Concentration Risk, Call Risk, Cash Transactions Risk, Changing Global Fixed-Income Market Conditions Risk, Declining Yield Risk, Emerging Markets Investment Risk, Emerging Markets Sovereign Debt Risk, Fixed-Income Securities Risk, Fluctuation of Yield and Liquidation Amount Risk, Foreign Fixed-Income Investment Risk, Index Risk, Industry Concentration Risk, Financials Sector Risk, Issuer-Specific Changes Risk, Liquidity Risk, Market Risk, Market Trading Risk, Non-Correlation Risk, Non-Diversified Fund Risk, Non-Investment Grade Securities Risk, Privately Issued Securities Risk, Rule 144A Securities Risk, Sampling Risk, Sovereign Debt Risk, Valuation Risk, Valuation Time Risk.

TRADING HALTS

When evaluating the necessity of imposing a trading halt in an ETF, Nasdaq may consider, among other factors:

- The extent to which trading has ceased in the underlying security(s);
- Whether trading has been halted or suspended in the primary market(s) for any combination of underlying securities accounting for 20% or more of the applicable current index group value. The value being established to be the value at the close of the prior trading day;
- The presence of other unusual conditions or circumstances deemed to be detrimental to the maintenance of a fair and orderly market.

The trading of an ETF, that has been the subject of a trading halt or suspension, may resume when Nasdaq determines that the conditions which led to the halt or suspension are no longer present or that the interests of a fair and orderly market are served by a resumption of trading.

DISSEMINATION OF FUND DATA

Quotation and trade data for NASDAQ-listed ETFs are disseminated via UTP Level 1, NASDAQ Basic, NASDAQ Level 2 and NASDAQ TotalView® using the trading symbol listed above.

Dissemination of the daily valuation information for the Funds will begin on December 31, 2019 with the following data elements and identifiers:

Issue Name for ETF	Nasdaq-listed Trading Symbol	Intraday Portfolio Value	Estimated Cash Amount Per Creation Unit	Total Cash Amount Per Creation Unit	Net Asset Value	Total Shares Outstanding
Invesco BulletShares 2020 Corporate Bond ETF	BSCK	BSCK.IV	BSCK.EU	BSCK.TC	BSCK.NV	BSCK.SO
Invesco BulletShares 2021 Corporate Bond ETF	BSCL	BSCL.IV	BSCL.EU	BSCL.TC	BSCL.NV	BSCL.SO

Issue Name for ETF	Nasdaq-listed Trading Symbol	Intraday Portfolio Value	Estimated Cash Amount Per Creation Unit	Total Cash Amount Per Creation Unit	Net Asset Value	Total Shares Outstanding
Invesco BulletShares 2022 Corporate Bond ETF	BSCM	BSCM.IV	BSCM.EU	BSCM.TC	BSCM.NV	BSCM.SO
Invesco BulletShares 2023 Corporate Bond ETF	BSCN	BSCN.IV	BSCN.EU	BSCN.TC	BSCN.NV	BSCN.SO
Invesco BulletShares 2024 Corporate Bond ETF	BSCO	BSCO.IV	BSCO.EU	BSCO.TC	BSCO.NV	BSCO.SO
Invesco BulletShares 2025 Corporate Bond ETF	BSCP	BSCP.IV	BSCP.EU	BSCP.TC	BSCP.NV	BSCP.SO
Invesco BulletShares 2026 Corporate Bond ETF	BSCQ	BSCQ.IV	BSCQ.EU	BSCQ.TC	BSCQ.NV	BSCQ.SO
Invesco BulletShares 2027 Corporate Bond ETF	BSCR	BSCR.IV	BSCR.EU	BSCR.TC	BSCR.NV	BSCR.SO
Invesco BulletShares 2028 Corporate Bond ETF	BSCS	BSCS.IV	BSCS.EU	BSCS.TC	BSCS.NV	BSCS.SO
Invesco BulletShares 2029 Corporate Bond ETF	BSCT	BSCT.IV	BSCT.EU	BSCT.TC	BSCT.NV	BSCT.SO
Invesco BulletShares 2020 High Yield Corporate Bond ETF	BSJK	BSJK.IV	BSJK.EU	BSJK.TC	BSJK.NV	BSJK.SO
Invesco BulletShares 2021 USD Emerging Markets Debt ETF	BSAE	BSAE.IV	BSAE.EU	BSAE.TC	BSAE.NV	BSAE.SO
Invesco BulletShares 2022 USD Emerging Markets Debt ETF	BSBE	BSBE.IV	BSBE.EU	BSBE.TC	BSBE.NV	BSBE.SO
Invesco BulletShares 2023 USD Emerging Markets Debt ETF	BSCE	BSCE.IV	BSCE.EU	BSCE.TC	BSCE.NV	BSCE.SO
Invesco BulletShares 2024 USD Emerging Markets Debt ETF	BSDE	BSDE.IV	BSDE.EU	BSDE.TC	BSDE.NV	BSDE.SO
Invesco BulletShares 2021 High Yield Corporate Bond ETF	BSJL	BSJL.IV	BSJL.EU	BSJL.TC	BSJL.NV	BSJL.SO
Invesco BulletShares 2022 High Yield Corporate Bond ETF	BSJM	BSJM.IV	BSJM.EU	BSJM.TC	BSJM.NV	BSJM.SO
Invesco BulletShares 2023 High Yield Corporate Bond ETF	BSJN	BSJN.IV	BSJN.EU	BSJN.TC	BSJN.NV	BSJN.SO
Invesco BulletShares 2024 High Yield Corporate Bond ETF	BSJO	BSJO.IV	BSJO.EU	BSJO.TC	BSJO.NV	BSJO.SO

Issue Name for ETF	Nasdaq-listed Trading Symbol	Intraday Portfolio Value	Estimated Cash Amount Per Creation Unit	Total Cash Amount Per Creation Unit	Net Asset Value	Total Shares Outstanding
Invesco BulletShares 2025 High Yield Corporate Bond ETF	BSJP	BSJP.IV	BSJP.EU	BSJP.TC	BSJP.NV	BSJP.SO
Invesco BulletShares 2026 High Yield Corporate Bond ETF	BSJQ	BSJQ.IV	BSJQ.EU	BSJQ.TC	BSJQ.NV	BSJQ.SO
Invesco BulletShares 2027 High Yield Corporate Bond ETF	BSJR	BSJR.IV	BSJR.EU	BSJR.TC	BSJR.NV	BSJR.SO

Expressed as a dollar amount per share, the Intraday Portfolio Values will be disseminated at least every 15 seconds from 9:30 a.m. to 4:00 p.m., ET.

SUITABILITY

Trading in the Shares on Nasdaq will be subject to the provisions of [Nasdaq Rule 2111A](#). Members recommending transactions in the Shares to customers should make a determination that the recommendation is suitable for the customer. Members must have a reasonable basis to believe that the recommendation is suitable for a customer based on information obtained through reasonable diligence to ascertain the customer's investment profile. A customer's investment profile includes, but is not limited to: the customer's age, other investments, financial situation and needs, tax status, investment objectives, investment experience, investment time horizon, liquidity needs, risk tolerance, and any other information the customer may disclose to the member or associated person in connection with such recommendation. Members must also consider the complexity of, and risks associated with, the Shares. In addition, members must possess sufficient information to satisfy the "know your customer" obligation that is embedded in the Nasdaq Conduct Rules ([Nasdaq Rule 2090A](#)).

Members also should review [NASD Notice to Members 03-71](#) for guidance on trading these products. The Notice reminds members of their obligations to: (1) conduct adequate due diligence to understand the features of the product; (2) perform a reasonable-basis suitability analysis; (3) perform customer-specific suitability analysis in connection with any recommended transactions; (4) provide a balanced disclosure of both the risks and rewards associated with the particular product, especially when selling to retail investors; (5) implement appropriate internal controls; and (6) train registered persons regarding the features, risk and suitability of these products.

FINRA has implemented increased sales practice and customer margin requirements for FINRA members applicable to inverse, leveraged, and inverse leveraged securities and options on such securities, as described in FINRA Regulatory Notices [09-31 \(June 2009\)](#), [09-53 \(August 2009\)](#) and [09-65 \(November 2009\)](#) ("FINRA Regulatory Notices"). Members that carry customer accounts will be required to follow the FINRA guidance set forth in the FINRA Regulatory Notices.

Nasdaq notes that, for such inverse, leveraged, and inverse leveraged securities, the corresponding fund seeks leveraged, inverse, or leveraged inverse returns on a daily basis, and do not seek to achieve their stated investment objective over a period of time greater than one day because compounding prevents the fund from perfectly achieving such results. Accordingly, results over periods of time greater than one day typically will not be a leveraged multiple (+200%), the inverse (-100%) or a leveraged inverse multiple (-200%) of the period return of the applicable benchmark and may differ significantly from these multiples.

DELIVERY OF A PROSPECTUS

NASDAQ members should be mindful of applicable prospectus delivery requirements under the federal securities laws with respect to transactions in the Funds.

Prospectuses may be obtained through the [Funds' website](#). The prospectus for each Fund does not contain all of the information set forth in each Fund's registration statement (including the exhibits to the registration statement), parts of which have been omitted in accordance with the rules and regulations of the Securities and Exchange Commission ("SEC"). For further information about the Funds, please refer to the registration statement.

In the event that the Fund relies upon an order by the SEC exempting the Shares from certain prospectus delivery requirements under Section 24(d) of the 1940 Act and in the future make available a written product description, [Nasdaq Rule 5705 \(b\)\(2\)](#) requires that Nasdaq members provide to all purchasers of Shares a written description of the terms and characteristics of such securities, in a form prepared by the Trust for the Funds, no later than the time a confirmation of the first transaction in the Shares is delivered to such purchaser. In addition, Nasdaq members shall include such a written description with any sales material relating to the Shares that is provided to customers or the public. Any other written materials provided by a Nasdaq member to customers or the public making specific reference to the Shares as an investment vehicle must include a statement in substantially the following form: "A circular describing the terms and characteristics of the Shares of the Fund has been prepared by the Trust and is available from your broker. It is recommended that you obtain and review such circular before purchasing Shares of the Fund. In addition, upon request you may obtain from your broker a prospectus for Shares of the Fund."

A Nasdaq member carrying an omnibus account for a non-member broker-dealer is required to inform such non-member that execution of an order to purchase Shares for such omnibus account will be deemed to constitute agreement by the non-member to make such written description available to its customers on the same terms as are directly applicable to Nasdaq member under this rule.

Upon request of a customer, Nasdaq members also shall provide a copy of the prospectus.

EXEMPTIVE, INTERPRETIVE AND NO-ACTION RELIEF UNDER FEDERAL SECURITIES REGULATIONS

The SEC has issued exemptive, interpretive or no-action relief from certain provisions of rules under the Securities Exchange Act of 1934 (the "Act") regarding trading in the above mentioned exchange-traded funds.

REGULATION M EXEMPTIONS

Generally, Rules 101 and 102 of Regulation M prohibit any "distribution participant" and its "affiliated purchasers" from bidding for, purchasing, or attempting to induce any person to bid for or purchase any security which is the subject of a distribution until after the applicable restricted period, except as specifically permitted in Regulation M. The provisions of the Rules apply to underwriters, prospective underwriters, brokers, dealers, and other persons who have agreed to participate or are participating in a distribution of securities.

The SEC has granted an exemption from Rule 101 under Regulation M to permit persons participating in a distribution of shares of the above-mentioned Fund to engage in secondary market transactions in such shares during their participation in such a distribution. In addition, the SEC has granted relief under Regulation M to permit persons who may be deemed to be participating in the distribution of Shares of the above-mentioned Funds (i) to purchase securities for the purpose of purchasing Creation Unit Aggregations of Fund Shares and (ii) to tender securities for redemption in Creation Unit Aggregations. Further, the SEC has clarified that the tender of Fund Shares to the Funds for redemption does not constitute a bid for or purchase of any of the Funds' securities during the restricted period of Rule 101. The SEC has also granted an exemption pursuant to paragraph (e) of Rule 102

under Regulation M to allow the redemption of Fund Shares in Creation Unit Aggregations during the continuous offering of Shares.

CUSTOMER CONFIRMATIONS FOR CREATION OR REDEMPTION OF FUND SHARES (SEC RULE 10b-10)

Broker-dealers who handle purchases or redemptions of Fund Shares in Creation Unit size for customers will be permitted to provide such customers with a statement of the number of Creation Unit Aggregations created or redeemed without providing a statement of the identity, number and price of shares of the individual securities tendered to a Fund for purposes of purchasing Creation Unit Aggregations (“Deposit Securities”) or the identity, number and price of shares to be delivered by the Trust for the Funds to the redeeming holder (“Redemption Securities”). The composition of the securities required to be tendered to the Funds for creation purposes and of the securities to be delivered on redemption will be disseminated each business day and will be applicable to requests for creations or redemption, as the case may be, on that day. This exemptive relief under Rule 10b-10 with respect to creations and redemptions is subject to the following conditions:

1. Confirmations to customers engaging in creations or redemptions must state that all information required by Rule 10b-10 will be provided upon request;
2. Any such request by a customer for information required by Rule 10b-10 will be filed in a timely manner, in accordance with Rule 10b-10(c);
3. Except for the identity, number and price of shares of the component securities of the Deposit Securities and Redemption Securities, as described above, confirmations to customers must disclose all other information required by Rule 10b-10(a).

SEC RULE 14e-5

An exemption from Rule 14e-5 has been granted to permit any person acting as a dealer-manager of a tender offer for a component security of a Fund (1) to redeem Fund Shares in Creation Unit Aggregations from the issuer that may include a security subject to such tender offer and (2) to purchase Fund Shares during such tender offer. In addition, a no-action position has been taken under Rule 14e-5 if a broker-dealer acting as a dealer-manager of a tender offer for a security of a Fund purchases or arranges to purchase such securities in the secondary market for the purpose of tendering such securities to purchase one or more Creation Unit Aggregations of Shares, if made in conformance with the following:

1. such bids or purchases are effected in the ordinary course of business, in connection with a basket of 20 or more securities in which any security that is the subject of a distribution, or any reference security, does not comprise more than 5% of the value of the basket purchased; or
2. purchases are effected as adjustments to such basket in the ordinary course of business as a result of a change in the composition of the underlying index; and
3. such bids or purchases are not effected for the purpose of facilitating such tender offer.

SECTION 11(d)(1); SEC RULES 11d1-1 AND 11d1-2

Section 11(d)(1) of the Act generally prohibits a person who is both a broker and a dealer from effecting any transaction in which the broker-dealer extends credit to a customer on any security which was part of a new issue in the distribution of which he participated as a member of a selling syndicate or group within thirty days prior to such transaction. The SEC has clarified that Section 11(d)(1) does not apply to broker-dealers that are not Authorized Participants (and, therefore, do not create Creation Unit Aggregations) that engage in both proprietary and customer transactions in Shares of a Fund in the secondary market, and for broker-dealer Authorized Participants that engage in creations of Creation Unit Aggregations. This relief is subject to specific conditions, including the condition that such broker-dealer (whether or not an Authorized Participant) does not, directly or indirectly, receive from the Fund complex any payment, compensation or other economic incentive to promote or sell the Shares of a Fund to persons outside the fund complex, other than non-cash compensation permitted under NASD Rule 2830(I)(5)(A), (B) or (C). (See [letter](#) from Catherine McGuire, Chief Counsel, SEC Division of Market Regulation, to Securities Industry Association, Derivative Products Committee, dated November 21, 2005.) The SEC also has taken a no-action position under Section 11(d)(1) of

the Act that broker-dealers may treat Shares of a Fund, for purposes of Rule 11d1-2, as "securities issued by a registered open-end investment company as defined in the Investment Company Act" and thereby extend credit or maintain or arrange for the extension or maintenance of credit on Shares that have been owned by the persons to whom credit is provided for more than 30 days, in reliance on the exemption contained in the rule.

SEC RULE 15c1-5 AND 15c1-6

The SEC has taken a no-action position with respect to Rule 15c1-5 and Rule 15c1-6 as to the required disclosure of control by a broker or dealer with respect to creations and redemptions of Fund Shares and secondary market transactions therein. (See [letter](#) from Catherine McGuire, Chief Counsel, SEC Division of Market Regulation, to Securities Industry Association, Derivative Products Committee, dated November 21, 2005.)

This Information Circular is not a statutory prospectus. Nasdaq members should consult the Funds' prospectus and/or the [Funds' website](#) for relevant information.

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