

NYSE Regulation

Regulatory Bulletin NYSE National RB-18-16 May 25, 2018

To: NYSE NATIONAL, INC. ETP HOLDERS

Subject: TRADING PURSUANT TO UNLISTED TRADING PRIVILEGES OF COMMODITY-BASED TRUST SHARES

ETP Holders are informed that commodity-based trust shares ("Shares") of the funds identified on Appendix A hereto (each, a "Fund") will commence trading pursuant to unlisted trading privileges on NYSE National, Inc. ("NYSE National" or the "Exchange") on May 25, 2018. Shares of the Funds will be traded pursuant to NYSE Rule 8.201E (Commodity-Based Trust Shares). Please forward this Regulatory Bulletin to other interested persons within your organization.

Background on the Securities

A commodity-based trust share is a security that (a) is issued by a trust that holds a specified commodity deposited with the trust, (b) is issued by such trust in specified aggregate minimum number of Shares in return for a deposit of a quantity of the underlying commodity, and (c) when aggregated in the same specified minimum number of Shares, may be redeemed by such trust, at a holder's request, for a corresponding amount of the underlying commodity. The index or reference asset underlying each Fund is identified on Appendix A.

Each Fund's trust issues and redeems Shares at net asset value ("NAV") only in a large specified number of Shares called a "Creation Unit," or multiples thereof (typically 20,000 to 100,000 Shares). Creation Unit transactions are typically conducted in exchange for the deposit or delivery of in-kind securities in the underlying index and/or cash.

With respect to each Fund, the following information is included in Appendix A: Fund name, name of underlying index or reference asset, trading symbol, IIV symbol, NAV symbol and Fund website.

Each Fund's Registration Statement describes the various fees and expenses for each Fund's Shares. For a more complete description of each Fund, and its underlying index or reference asset, see the applicable Fund's website.

Risk Factor Information

Interested persons are referred to each Fund's prospectus for a description of risks associated with an investment in such Fund. These may include, but are not limited to, commodity risk, valuation risk, and market risk. In addition, the market prices of the Shares will fluctuate in accordance with changes in NAV as well as the supply and demand for the NYSE National RB-18-16 May 25, 2018 Page 2 of 4

Shares. As a result, the Shares may trade at market prices that may differ from their NAV. The NAV of the Shares of each Fund will fluctuate with changes in the market value of a Fund's holdings.

Exchange Rules Applicable to Trading in the Shares

The Shares of each Fund are considered equity securities, thus rendering trading in the Shares subject to the Exchange's existing rules governing the trading of equity securities.

Trading Hours

The value of each underlying index will be disseminated to data vendors every 15 seconds or 60 seconds, as applicable, from 9:30 a.m. ET until 4:00 p.m. ET. The Shares will trade on NYSE National from 7:00 a.m. ET until 8:00 p.m. ET on every business day in accordance with NYSE National Rule 7.34.

Extended Hours Trading

ETP Holders are reminded of NYSE National Rule 7.34 regarding Customer Disclosure and that trading in a Fund's Shares during the Exchange's Early Trading Session and Late Trading Session may result in additional trading risks which include: (1) that the current applicable underlying Index value may not be updated during the Early Trading Session and Late Trading Session, (2) the intraday indicative value may not be updated during the Early Trading Session and Late Trading Session may impact pricing, (3) lower liquidity in the Early Trading Session and Late Trading Session may impact pricing, (4) higher volatility in the Early Trading Session and Late Trading Session may impact pricing, (5) wider spreads may occur in the Early Trading Session and Late Trading Session, and (6) since the intraday indicative value is not calculated or widely disseminated during the Early Trading Session and Late Trading Session, an investor who is unable to calculate an implied value for Shares of a Fund in those sessions may be at a disadvantage to market professionals.

Suitability

Trading in the Shares of a Fund on the Exchange will be subject to the provisions of NYSE National Rule 11.2111 - Suitability and other applicable suitability rules. ETP Holders recommending transactions in the Shares of a Fund to customers should make a determination that the recommendation is suitable for the customer.

Trading Halts

The Exchange will halt trading in the Shares for a regulatory halt similar to a halt based on NYSE National Rule 7.18 and/or a halt because dissemination of the intraday indicative value of the Shares and/or the underlying value of the index has ceased. Further, the Exchange will halt trading in the Shares in accordance with NYSE National Rule 7.12 ("Trading Halts Due to Extraordinary Market Volatility").

Delivery of a Prospectus

Consistent with the requirements of the Securities Act of 1933 and the rules thereunder, investors purchasing Shares in the initial public offering and anyone purchasing Shares directly from a Fund (by delivery of the designated securities) must receive a prospectus. In addition, ETP Holders are required to deliver a prospectus to all purchasers of newly-issued Shares (i.e., during the initial public offering). ETP Holders purchasing shares from a Fund for resale to investors will deliver a prospectus to such investors.

Prospectuses may be obtained through a Fund's website. The Prospectus does not contain all of the information set forth in a 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 (the "Commission"). For additional information about a Fund, please refer to its registration statement.

Exemptive, Interpretive and No-Action Relief Under Federal Securities Regulations

The Commission has issued letters (the "No-Action Letters") granting exemptive, interpretive an no-action relief from certain provisions of rules under the Securities Exchange Act of 1934 ("Act") for exchange-traded securities listed and traded on a registered national securities exchange that meet certain criteria.

AS WHAT FOLLOWS IS ONLY A SUMMARY OF THE RELIEF OUTLINED IN THE NO-ACTION LETTERS REFERENCED ABOVE, THE EXCHANGE ADVISES INTERESTED PARTIES TO CONSULT THE NO-ACTION LETTERS FOR MORE COMPLETE INFORMATION REGARDING THE MATTERS COVERED THEREIN AND THE APPLICABILITY OF THE RELIEF GRANTED IN RESPECT OF TRADING IN SECURITIES. INTERESTED PARTIES SHOULD ALSO CONSULT THEIR PROFESSIONAL ADVISORS.

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 these 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 Commission has granted an exemption from Rule 101 under Regulation M to permit persons participating in a distribution of shares of a fund meeting the criteria in the No-Action Letters to engage in secondary market transactions in such shares during their participation M to permit persons who may be deemed to be participating in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting in the distribution of shares of a fund meeting the criteria in the No-Action Letters (i) to purchase securities for

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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 shares of a fund meeting the criteria in the No-Action Letters for redemption does not constitute a bid for or purchase of any of the fund's 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.

The Commission's no-action relief provides and exemption under paragraph (d) of Rule 101 of Regulation M, permitting persons who may be deemed to be participating in a distribution of Commodity Based Investment Vehicles ("CBIVs") shares to bid for or purchase shares during their participation in such distribution. The no-action relief also provides an exemption under paragraph (e) of Rule 102 under Regulation M, permitting a CBIV and its affiliates to redeem shares in Creation Units during the continuous offering of the shares.

The exemptions from Rules 101 and 102 of Regulation M are subject to the condition that such transactions in shares or any related securities are not made for the purpose of creating actual, or apparent, active trading in or raising or otherwise affecting the price of such securities.

This Information Bulletin is not a statutory prospectus. ETP Holders should consult each applicable trust's registration statement, Statement of Additional Information, prospectus and each Fund's website for relevant information.

Fund Name	Underlying Index	Fund	IIV	NAV	Fund Website
	Name	Symbol	Symbol	Symbol	
ETFS Physical PM Basket	Platinum Spot Price	GLTR	GLTRIV	GLTRNV	www.usa.etfsecurities.com
Shares, Shares of					
beneficial interest, no par					
value					
GraniteShares Gold	The Spot Price of a	BAR	BARIV	BARNV	www.graniteshares.com
Shares	Troy Ounce of Gold				
Shares of the iShares	The Spot Price of a	IAU	IAUIV	IAUNV	www.ishares.com
Gold Trust	Troy Ounce of Gold				
Sprott Physical Gold &	Gold Spot Price &	CEF	CEFIV	CEFNV	www.sprott.com
Silver Trust	Silver Spot Price				
SPDR Long Dollar Gold	Solactive GLD Long	GLDW	GLDWIV	GLDWNV	www.spdrgoldshares.com
Trust	USD Gold Index				
SPDR Gold Shares	The Spot Price of a	GLD	GLDIV	GLDNV	www.spdrs.com
	Troy Ounce of Gold				