Data Provider Due Diligence Questionnaire ("DDQ")

Because investment managers intend to use this data to inform investment decisions for trading public and private securities, they must consider applicable securities laws, as well as other laws, in evaluating data sets. The responses you provide here will likely be material to an investment manager's decision to acquire and use the data product(s).

As a general rule, investment managers do not want to receive data containing and/or derived from the following types of information:

- **Material, non-public information (also known as "MNPI" or "Inside Information")** (i.e., information that is not widely known and could affect a reasonable investor's decision to trade);
- **Information that is subject to a confidentiality obligation;**
- **Information that the vendor is prohibited from disclosing**;
- **Information obtained through misappropriation, through deception, in violation of law, or in breach of a duty (whether contractual, fiduciary, or otherwise)**; and
- **Personal Information, Personally Identifiable Information and Personal Data (referred to herein as "Covered Personal Information")** (i.e., information that could be used to identify or be associated with individual natural persons).

DEFINITIONS

The following definitions apply:

- "Company" means the name of the entity offering the Data.
- "Affiliate" means any entity that controls, is controlled by, or is under common control with the Company.
- "Data" means the information product offered by the Company and, where appropriate, any information used directly or indirectly to create, process, structure, acquire, aggregate, or resell the Data.
    - When the words "information," "data," or "data set" are used, without having been capitalized, please interpret them according to their ordinary dictionary meaning.
- "MNPI" and "Inside Information" have the meanings used above.
- "Covered Personal Information" has the meaning used above.

INSTRUCTIONS

Please answer each question in this DDQ, responding with all information available to you and which you believe to be true after performing a reasonable investigation. If you must make an interpretation of any question or any term used within a question, please describe that interpretation as part of your answer.

DOCUMENT REQUEST LIST

In addition to answering the questions below, please provide the following, if they exist for the Data:

- A document describing the Data, such as a tear sheet, brochure, or other marketing literature
- A data dictionary, data schema, or other document listing the fields provided in the Data and describing the types of values that may be contained within each field
- A small sample of the Data in human-readable form. This sample should contain less than 100 rows of Data. The sample Data should be from more than 3 months ago
- If you buy Data from others, a copy of any relevant terms from your contracts with those persons. These terms should show your legal right to resell or license the Data to us and/or to sell/license newly created (i.e. "derived") Data products
- If you collect or generate Data from or about individuals or their devices, a copy of any consent or other terms you have entered into with those individuals concerning Data collected from or about them or their devices

1 COMPANY INFORMATION

1.1	What is the Company's name?	MarketGraphs Ltd.
1.2	Does the Company have a different legal name?	No. The registered name is MARKETGRAPHS LTD, Companies House number 17285514.
1.3	Company's principal business/headquarters address:	London E14 9BF, United Kingdom. The full registered office address is on the Companies House register under number 17285514.
1.4	Please provide the registered address of the Company if different from its principal business address.	The same.
1.5	Years in business:	Incorporated 19 June 2026.
1.6	Names of any Affiliates, if relevant with respect to the Data:	None.
1.7	Is Company or any Affiliate a regulated entity?	☐ Yes, and details are provided below ☒ No No. MarketGraphs Ltd is not authorised by the Financial Conduct Authority (FCA) or any other regulator. It sells descriptions of published research to firms and individuals. It gives no advice, holds no client money and deals in nothing.
1.8	Do you model, maintain a "paper book" or otherwise track potential performance of your data product(s) against the public equity markets? If yes, do you publish or share with clients?	No. We do not model or track the performance of the Data and keep no paper book. Separately, an audit re-implements one paper's published strategy on clean historical data and reports what the paper claimed next to what we measured. Audits are historical, carry no signal and are published to subscribers at the audit depth. They are not a track record of the Data.
1.9	Please describe any formal or informal investment policies the Company maintains concerning its investments or the investments of its employees.	None in writing. The Data carries no signal and reaches every subscriber at the same moment, so there is nothing in it to trade ahead of. Subscriber queries are never kept, so nothing can be traded on them either.

1.10	Does the Company make investments or allow its employees to make investments based on the Data?	□ Yes, and details are provided below ☒ No No. The Data describes published research and carries no signal. Nobody at the company trades on it or on what subscribers ask.
1.11	What is the Company's website address?	market-graphs.com. The server: mcp.market-graphs.com.
1.12	Name of Executive Relationship Manager, Account Representative, or other primary sales contact:	Aleksei Fedotenkov, founder and director. alex@market-graphs.com.
1.13	Please provide the names of at least two persons who have reviewed the responses to this questionnaire and what function they hold at the Company. If you have a legal or compliance department, at least one person from one of those departments should review these responses.	Aleksei Fedotenkov, founder and director. The second reviewer is to be appointed and is named here on appointment. The company has no legal or compliance department.
1.14	Effective date of this questionnaire:	3 November 2026. Reviewed once a year and on any material change.

2 Product/Service Information

2.1 GENERAL

2.1.1	What is the name of the Data? Please provide any alternate names that Data may be known by.	Praxis. Also called the Praxis research library, the MarketGraphs MCP connector or MarketGraphs Praxis.
2.1.2	Please describe the Data or provide a description from your data catalogue, tear sheet, or other documentation.	Structured descriptions of published systematic-trading research. Each paper is identified from open scholarly metadata, classified into a strategy family and an asset class, and described in our own words from its abstract. Where the paper's licence allows reading it in full, a method record adds how the strategy works, the data it used, the results it reports and what its tests disclosed, each value with a short attributed quote. Every record links to the original and carries a depth flag. Delivered read-only through an MCP (Model Context Protocol) server into the subscriber's own AI client. The live counts are at mcp.market-graphs.com/trust.
2.1.3	In what year did the Company begin offering the Data to customers?	2026.
2.1.4	Approximate number of active customers in each category below that the Company provides the Data to: • Financial services related customers? • Non-Financial services related customers?	Approximate number of financial services related customers: 1-5 Approximate number of non-financial services related customers: 0
2.1.5	Is the Data disseminated simultaneously to all customers?	☒ Yes ☐ No, and explanation is provided below Yes. One server, one dataset, no early access. What an account sees depends on its plan, never on who it is.

2.1.6	Are there any third party dependencies and/or access restrictions to the Data that would impact our receipt and/or use of the Data (e.g., expiration of upstream license agreement(s), anticipated updates to website/app terms of service through which the data is collected, changing privacy regulations (i.e., CPRA)?	☐ Yes, and explanation is provided below ☒ No No. The index and summary depths come from open scholarly metadata under open terms (Crossref, OpenAlex, arXiv, RePEc). The method depth is read only where a paper's licence allows, so a change in a source's terms can pause new method records from that source. It cannot withdraw a record read under a licence we hold. No upstream licence agreement expires.
2.1.7	Do you collect or generate the Data yourself, or do you buy or collect the Data from others? If you either buy or collect the Data from others, please provide any relevant Terms & Conditions or Agreements with those persons related to the Data, such as user consents to collection and dissemination of anonymized personal data or terms demonstrating your ability to resell the Data or to create derived Data products. You may redact such agreements as necessary to comply with your confidentiality obligations.	We collect and generate the Data ourselves and buy nothing. The underlying information is published research, reached through open scholarly indices and public repositories under their published terms. No consents from individuals are involved. The terms of every source are archived with a hash on the day they were read and are available on request.
2.2 DATASET INFORMATION		
2.2.1	From which countries/states/clouds are the Data obtained?	Open scholarly indices and public repositories hosted in the United States and the European Union.
2.2.2	Where are the Data stored? In which countries/states/clouds are the Data stored?	Germany, on a server operated by Hetzner Online GmbH. An encrypted backup goes nightly to Cloudflare object storage in the European Union.

2.2.3	Please indicate whether any of these data generating or collection methods are used to create the Data:	☒ Web scraping ☐ Apps; browser plugins; from consumers generally ☐ From third party aggregators ☐ IoT devices ☐ Financial transaction/exchange ☒ Government/public sources (please explain): open scholarly indices and public repositories, among them central-bank working paper series ☐ On-premise data collection (e.g. counting cars in parking lots) ☐ Calls with public companies, expert networks, surveys of companies/indivduals ☐ Satellite/drone/radar collection
2.2.4	Do you use Generative AI tools (e.g., ChatGPT) in the production of your Data? "Generative AI" means generative pre-trained transformers and large language models that produce new content in response to a user's prompts based on the data the models were trained on. **If yes, please fill out Appendix 4, which refers to "Generative AI".**	Yes. Appendix 4 is answered below.
2.2.5	Who provides the underlying information contained in the Data?	The papers' authors, through their publishers and the open indices that list them.
2.2.6	Please describe any diligence **you perform on the Data** to determine whether the persons or companies providing the underlying information contained in the Data have the legal right to do so?	Each source's terms are read and archived with a hash before anything is read from it. The licence that applies to a paper is recorded on its record. A field is served only where that licence allows it. Where the licence limits us, the paper is served at summary depth from open metadata and the method record is withheld and marked as such.
2.2.7	Please describe any other due diligence **performed on third-party data suppliers**?	None needed. There are no third-party data suppliers. The sources are public indices and repositories.

2.2.8	Does the company have contracts in place with primary data providers? If yes, please provide redacted copies of those contracts.	☐ Yes, and the contracts are provided as described below ☒ No No. There are no contracts with data providers. The sources' published terms are archived and available on request.

3 MNPI, Covered Personal Information, and Other Issues

3.1 MNPI/Inside Information and Covered Personal Information

3.1.1	Does the Data contain any MNPI or inside information, or is it potentially derived from MNPI or inside information?	☐ Yes, and more details are provided below ☒ No No. The Data describes published papers that anyone can reach. Nothing enters the corpus except through open indices.
3.1.2	Does the Company engage in any activities that involve, or expose it to, MNPI, regardless of whether the Data relating to this request contains or is potentially derived from MNPI?	☐ Yes, and more details are provided below ☒ No No. No company contact, no expert calls, no surveys, no non-public documents.
3.1.3	Does the Data contain or is it derived from any information that is otherwise confidential? For example, your license to the Data is covered by a non-disclosure agreement.	☐ Yes, and more details are provided below ☒ No No. No licence under a non-disclosure agreement and no confidential source.
3.1.4	Please describe any diligence you perform on the Data concerning issues surrounding MNPI, inside information, or otherwise confidential information?	By construction. A paper enters the corpus only from an open index with a public listing. Nothing is accepted from a person or a private channel, with one exception: an author sending us a copy of their own published paper.

3.1.5	Have you used reasonable best efforts to determine that any data you use to create the Data was not derived from a breach of fiduciary duty, breach of contract or deceptive behavior? And are you reasonably sure the Data does not contain any of the forgoing?	Yes, and we are reasonably sure. No field served is derived from a source accessed against its terms, through a proxy, a solved CAPTCHA or a hidden identity. Where a source's terms limit automated reading, the paper is served at summary depth and the method record is withheld. Each record names its licence and the route by which its file was obtained.
3.2 PERSONAL DATA / PII		
3.2.1	Does the Company, or do the third party sources of any underlying Data used by the Company to produce the Data, collect any Covered Personal Information as part of its products and/or services? **If Yes, please also answer the questions in Appendix 1**	☒ Yes, and more details are provided below ☐ No Yes. Author names, affiliations and author identifiers, as printed in the paper and listed in the open indices. Nothing about consumers, nothing about subscribers. Appendix 1 is answered below.
3.2.2	How does the Company identify whether it, or the third party sources of any underlying data used by the Company to produce the Data, collects any Covered Personal Information?	The author fields are the only personal data in the corpus, by design. Nothing is extracted from a paper's text except the facts of the strategy. Email addresses, telephone numbers and postal addresses printed in a paper are not extracted.
3.3 OTHER ISSUES		
3.3.1	Does the Company collect any Data through web scraping or other automated data harvesting (e.g., does the Company deep-link, scrape, crawl or use robots, spiders, or other automated programs, devices, algorithms or methods to collect Data from websites)? **If yes, please fill out Appendix 2, which refers to these practices as "scraping."**	☒ Yes ☐ No
3.3.2	Does the Company collect any Data through the use of Application Programming Interface ("API") calls or similar techniques? **If yes, please fill out Appendix 2, which refers to these practices as "scraping."**	☒ Yes ☐ No
3.3.3	Does the Company collect Data from mobile devices, such as phones or tablets or collect data about individuals' digital device usage? **If yes, please fill out Appendix 3.**	☐ Yes ☒ No

4 COMPANY LEGAL AND REGULATORY INFORMATION

4.1 COMPANY'S INTERNAL LEGAL AND REGULATORY CONTROLS

4.1.1	Does the Company have a legal department and, if so, how many employees make up the function?	□ Yes, the number of employees is provided below ☒ No No legal department. The company is one person, the founder.
4.1.2	Please provide the name of the Company's outside counsel, if any, relating to the Data and/or the Company's data practices more generally.	To be appointed and named here on appointment.
4.1.3	Please provide a description of how the legal and compliance aspects of the collection and dissemination of data are managed by the Company.	By the founder, under the rules published at mcp.market-graphs.com/trust: every source's terms archived before reading, a licence recorded on every record, fields served only where the licence allows, three written policies, a yearly review of these answers with the second reviewer, and counsel on appointment.
4.1.4	Does the Company maintain written policies and procedures regarding the handling sensitive information, including: • MNPI • Covered Personal Information • Confidential information • Data supplier due diligence, if applicable?	☒ Yes, a description of the policies is provided below □ No Yes. Three, published at mcp.market-graphs.com/trust: material non-public information, personal and confidential information, and escalation and incident notice. Supplier due diligence does not apply, there are no data suppliers.

4.2 GENERAL DATA COLLECTION AND DATA DISSEMINATION		
4.2.1	How does the Company ensure it complies with the terms of use of any data source from which data is obtained (e.g., websites, third-party suppliers)?	Every source's terms are archived with a hash on the day they are read and re-read when they change. The crawler identifies itself with the company's name, website and a contact address on every request, keeps to each site's robots.txt and crawl delay, and reads at a human pace. The licence that applies is recorded on each record and decides which fields are served. Where terms forbid automated reading, the source is not read and the paper stays at summary depth.
4.2.2	Relating to its data collection/use/distribution practices, in the last 5 years, has **the Company** ever? Please provide additional details, if necessary	☐ Received a cease and desist order ☐ Been sued/notified of alleged claim ☐ Received a subpoena ☐ Been subject to an investigation by a regulator, law enforcement agency, or governmental organization ☐ Other ☒ None of the above Please click or tap here to provide additional details, if necessary.

4.2.3	With respect to the **providers of underlying data** used by the Company, and their collection/ use/ distribution practices, is the Company aware whether in the past 5 years, any of those provider have ever?	□ Received a cease and desist order □ Been sued/notified of alleged claim □ Received a subpoena □ Been subject to an investigation by a regulator, law enforcement agency, or governmental organization □ Other ☒ None of the above None of the above, to our knowledge. The sources are open scholarly indices and public repositories.

Appendices

Please answer the questions in one or more of the appendices below if you were directed to do so by one of the questions in the main body of the questionnaire.

1 COVERED PERSONAL INFORMATION

1.1	Are natural persons provided notice regarding the commercialization of their Covered Personal Information? (either by the Company or by the third-party sources of any data used to produce the Data)?	☒ Yes ☐ No ☐ Not applicable
1.2	Do natural persons provide consent to the commercialization of their Covered Personal Information?	☐ Yes ☒ No ☐ Not applicable
1.3	Please provide copies/links of any relevant, related evidence regarding notice provided to or consent received from natural persons to the Company itself and/or to any third party sources of any underlying data used to produce the Data.	The authors' notice at mcp.market-graphs.com/trust. The privacy policy, section on authors. An objection goes to alex@market-graphs.com and is answered within 30 days.
1.4	Does the Company or any third party sources used to produce the Data employ any de-identification or anonymization processes?	☐ Yes, and more details are provided below ☒ No ☐ Not applicable No. Author names are kept as published, because attribution is the purpose. No other personal data is held.
1.5	Please describe any diligence you perform on the Data concerning issues surrounding Covered Personal Information or other data protected by privacy laws. This includes not only the Data, but also third party sources of any underlying data, as well as the underlying data provided by those third party sources. In other words, please describe diligence you perform on your data vendors (if any) and the data they provide.	There are no data vendors. The author fields come from the paper and the open indices and nothing else is extracted. An author can have a record corrected, their paper described from its abstract only, or object to the description. Subscriber data is covered by the privacy policy.

2 WEB SCRAPING AND APIS

2.1	Do you use any service providers to assist you in web data collection including proxies, CAPTCHA solutions, third-party scraping providers, or others? **IF SO, YOUR ANSWERS BELOW INCLUDE BOTH YOUR PRACTICES AS WELL AS THOSE OF THE ABOVE-REFERENCED SERVICE PROVIDERS**	☐ Proxies ☐ CAPTCHA solutions ☐ Third-party scraping providers ☐ Others
2.2	Has the Company considered any industry or other web data collection guidelines including - The FISD Web Data Collection Guidelines - Investment Data Standards Organization Web Crawling Best Practices - Others? Please describe how you implement and/or comply with that guidance.	Yes. The FISD Web Data Collection Considerations (terms of service, robots, proxies, CAPTCHA, volume, cease and desist, copyright, privacy). How we comply: terms archived and followed, robots.txt honoured, identified client, no proxies, no CAPTCHA, human pace and crawl delays, nothing behind a login, copyright-free facts and our own words served, authors' notice published.
2.3	Does the Company perform any analysis of the terms and conditions of the websites that it scrapes? If so, please describe that analysis.	☒ Yes, and details are provided below ☐ No Yes. Each source's terms are read before the first fetch, archived with a hash, and reduced to one rule per source: what may be read, what may be kept, and the depth at which its papers may be served. The rule is re-checked when the terms change.
2.4	Does the Company scrape data from directories or files specified as disallowed in robots.txt?	☐ Yes ☒ No
2.5	Does the Company utilize proxies, including anonymizing proxies? If so, do the proxy providers include information sufficient for scraped websites to contact the Company?	☐ Yes, and details are provided below ☒ No No. Requests come from the company's own server and carry its name, website and contact address.
2.6	Does the Company use multiple IP addresses or otherwise anonymize its IP addresses?	☐ Yes, and details are provided below ☒ No No. One server, one address, no anonymisation.

2.7	Does the Company use onion routing in connection with its scraping activities?	☐ Yes, and details are provided below ☒ No No.
2.8	Does the Company collect data from websites that require an affirmative action to access the data (e.g., checking a box to accept its terms and conditions, providing a user identification and/or password, completing a CAPTCHA or completing a similar verification mechanism)?	☐ Yes, and details are provided below ☒ No No. Nothing behind a login, a checkbox or a CAPTCHA is read.
2.9	Are the websites from which the Company scrapes able to identify and contact the Company?	☒ Yes ☐ No Yes. Every request carries the company's name, website and a contact address.

3 DIGITAL DEVICE/MOBILE DATA

3.1	Does the Company monitor, or is the Data or underlying data obtained by monitoring, the browsing habits of individuals?	☐ Yes, and details are provided below ☒ No Click or tap here to provide additional details.
3.2	Does the Company process, or is the Data or underlying data obtained by processing, geolocation data from individuals' digital devices?	☐ Yes, and details are provided below ☒ No Click or tap here to provide additional details.
3.3	Does the Company process, or is the Data or underlying data obtained by processing, data from Apple or Android mobile devices? If so, please provide details of steps the Company takes to ensure its practices conform to development guidelines and/or the legal requirements of the relevant application platform.	☐ Apple device data ☐ Android device data Not applicable. No device data.

4 GENERATIVE AI

4.1	What is/are the name(s) of the Generative AI tool(s) you use in the production of your Data?	Claude models by Anthropic (Claude Haiku 4.5, Claude Sonnet 4.6 and Claude Opus 4.6), run through Amazon Bedrock in the London region. Each record names the model that helped it.
4.2	Is/are the Generative AI tool(s) the public version of such tool(s) (which, for clarity, includes any public version of a Generative AI tool as well as any other version of a Generative AI tool (even if not public) where your inputs could be shared with third parties or used to train the model), or the internal version of such tool(s)?	Not the public version. The models run on Amazon Bedrock, where inputs are not shared with the model's maker, not used to train and not retained for training, under Amazon's published Bedrock data policy.
4.3	How are Generative AI tool(s) used in the production of your Data?	A model reads the paper text and proposes values for the method record, each with the quote and the section that support it. Every model-assisted value is marked and names the model. The index and summary depths involve no model.
4.4	Do you input into the Generative AI tool(s) any: PII, PHI, MNPI, confidential information, or intellectual property-protected information? If yes: Please explain, and please also provide information relating to any controls in place around those inputs.	Published paper text, which is protected by copyright and read under the licence rules published at mcp.market-graphs.com/trust, and the author names printed in it. No other personal information, no health information, no MNPI, no confidential information. Customer data never enters a model. Controls: the text goes to Amazon Bedrock in London only, is not retained for training, and only papers whose licence allows reading in full are sent.
4.5	Do you review the output for accuracy and/or bias, as applicable? If yes: Please describe and provide any related policies or procedures.	Yes. Every value a model proposes must fit the record's schema, carry a quote and a section that exist in the paper, and agree with the rule-based checks. A value that fails is marked unsure or missing, never silently filled. A sample of records is read by a person each month. Bias does not arise: the records are extractions of what a paper states, not judgements.
4.6	Please describe how the Generative AI tool was trained, where the training data set came from and how it works.	The models are Anthropic's. How they were trained and on what is described in Anthropic's published model documentation and is not ours to warrant. Our use does not change the models.

4.7	Are the Generative AI tools trained on any: (a) customer data and/or any other, underlying data subject's or end user's data? (b) data licensed from a third party? If yes: Please explain, including details of any diligence performed on the training data to determine whether the persons or companies providing the underlying information training the Generative AI tool have the legal right to do so. To the extent applicable, please provide a copy of any disclosures/consents/licensing language from the relevant contract, arrangement or terms of service (subject to reasonable redaction of sensitive and irrelevant information) related to such data.	(a) Never on our customers' data or any end user's data. Customer data never enters a model. (b) Whether the model's maker licensed training data is the maker's matter and is covered by its published documentation. We perform no diligence on it beyond choosing a provider that does not train on our inputs.