

PROXY VOTING GUIDELINES FOR BANK SECURITIES The Board of Trustees has authorized the Adviser to delegate proxy voting for certain bank and bank holding company securities (“Bank Securities”) that are held in the JPMorgan BetaBuilders U.S. Equity ETF, JPMorgan BetaBuilders U.S. Mid Cap Equity ETF, JPMorgan BetaBuilders U.S. Small Cap Equity ETF and JPMorgan Carbon Transition U.S. Equity ETF and other Funds identified from time to time by the Adviser to Institutional Shareholder Services, Inc. (“ISS”), to be voted in accordance with ISS policies and procedures (“ISS Guidelines”) except effective January 1, 2024, proxies for Bank Securities issued by J.P. Morgan Chase & Co. shall be delegated to Glass Lewis to be voted in accordance with Glass Lewis policies and procedures (“Glass Lewis Guidelines”) rather than ISS Guidelines. The delegation described in this section may occur where the Adviser is restricted under applicable laws from voting a particular security or to permit the Adviser to utilize exemptions from limitations arising under the Bank Holding Company Act that might otherwise prevent the Adviser from acquiring Bank Securities on behalf of a Fund. Below are the ISS Guidelines and Glass Lewis Guidelines.