

APPENDIX C (CONFIDENTIAL) – FURTHER CONSIDERATIONS

Recorded music companies, music publishers, independent labels, artist management firms, touring and live-event promoters, merchandise licensors, music distributors and marketing agencies, and the broadcasters, streaming distributors, and advertisers associated with the iHeartRadio Music Awards telecast all face material financial exposure tied to how many nominations a given artist receives at a given iHeartRadio Music Awards ceremony. Awards-campaign budgets, promotional spending, radio servicing plans, catalog and single re-release schedules, tour routing and ticket pricing decisions, merchandise production runs, synchronization and brand-partnership negotiations, and the timing of advance recoupment and royalty projections are frequently structured around an expected nomination haul, because nomination volume is a well-documented driver of near-term radio airplay, streaming consumption, media demand, and live-event pricing power for the artists involved. If an artist receives materially fewer nominations than expected, a label or manager may be left with idle campaign spend, over-produced inventory, over-priced or under-subscribed tour inventory, and revenue shortfalls against contractual commitments; if an artist receives materially more, the same participants may be unable to meet a sudden surge in demand for pressings, merchandise, ticketed dates, or promotional availability, and may incur premium costs to scale up on short notice. A standardized contract that settles on the number of nominations a specified artist receives at a specified iHeartRadio Music Awards ceremony allows participants with this exposure to hedge against awards-recognition risk and to better align their operational, marketing, and financial planning with the actual, rather than merely anticipated, outcome of iHeartMedia's nominee-determination process.

The Exchange has not determined such contracts to be contrary to the public interest and there has been no determination by the Commission that such contracts would be contrary to the public interest. The Contract provides a means for managing and assuming price risks, discovering prices, and disseminating price information on the Exchange's fair and financially secure trading facility.

The Contract has bona fide risk mitigation and price basing utility for participants with underlying economic exposure. The Contract is not merely recreational, as the discussion of risk mitigation and price basing/price discovery utility demonstrates. The outcome of the Contract is not predominantly determined by chance and depends on a variety of factors. Finally, it is possible for traders to use skill and effort to gain knowledge and information about the likelihood of the event.

APPENDIX D (CONFIDENTIAL) – SOURCE AGENCY

This Appendix D addresses, in the same order as Appendix A, each Source Agency listed for the Contract: (1) iHeartMedia, Inc., including iHeartRadio and its affiliated radio stations, mobile and digital applications, and press office, in association with Fox Entertainment; and, as fallback sources, (2) the Associated Press; (3) Bloomberg News; (4) Reuters; (5) the New York Times; (6) the Washington Post; (7) CNBC; (8) BBC; (9) ABC; (10) CBS; (11) CNN; (12) Fox News; (13) MS Now; (14) NBC; and (15) the Wall Street Journal.

iHeartMedia, Inc. – the official list of nominees published through iHeartRadio, iHeartMedia's press office, and the iHeartMedia/Fox Entertainment nominee announcement (Primary Source Agency)

iHeartMedia, Inc. is a media and entertainment company that traces its identity to Clear Channel Communications, founded in 1972, and has operated under the iHeartMedia name and its iHeartRadio digital platform since 2014, with dual headquarters in San Antonio, Texas and New York; it has presented the iHeartRadio Music Awards annually since 2014 in association with Fox Entertainment, which broadcasts and co-presents the ceremony. Its official channels are iHeart.com and news.iheart.com, together with the materials issued by its communications and press functions, and those channels are authoritative for this category of fact because an iHeartRadio Music Awards nomination has no existence independent of iHeartMedia's own determination and publication of it: iHeartMedia alone compiles the underlying airplay, streaming, and engagement data and applies its own published criteria to determine nominees, so it is not merely reporting the fact but constituting it. The specific product the Contract points to is the official list of nominees for the specified ceremony — the category-by-category nominee listing published through iHeartRadio and iHeartMedia's press office, together with the joint iHeartMedia/Fox Entertainment nominee announcement through which that list is first made public. Supplementary channels include iHeartMedia's official press releases, its official social media accounts, and the nomination-eligible rankings iHeartMedia separately publishes through Mediabase, its own radio-airplay-monitoring subsidiary. That record has a large, pre-existing, non-Contract audience with its own stake in accuracy: the artists and their representatives, record labels and publishers whose campaign spending and release planning turn on it, radio programmers and station groups (including but not limited to iHeartMedia's own stations) who track the same airplay data reflected in Mediabase, Fox Entertainment as broadcast and production partner, advertisers and sponsors of the telecast, and the trade and general press, all of whom consult the official list immediately on publication and would surface any discrepancy within minutes given that the list is substantially a function of publicly observable airplay and streaming performance. Internally, the underlying fact is determined through a process in which iHeartMedia compiles radio airplay data (monitored in significant part through Mediabase), iHeartRadio application streams, and other audience-engagement data over a fixed eligibility

period established in advance by iHeartMedia, applies its published methodology to identify nominees in each award category, and the resulting nominee list is reviewed internally before being jointly announced with Fox Entertainment and transcribed onto the public record via iHeartRadio and iHeartMedia's press office on a pre-announced date. The nominees list is published as a complete, dated record on the announcement date and is maintained thereafter as a live awards database rather than a delayed report, and because Appendix A defines the Underlying as the number of nominations received as announced by iHeartMedia — a discrete historical fact fixed at the moment of first announcement — and specifies that revisions made after Expiration do not affect the Expiration Value, any later correction, rescission, or disqualification does not retroactively unmake a nomination that had already been announced. iHeart.com's and news.iheart.com's awards pages and iHeartMedia's press materials are freely accessible without subscription, login, or fee. As to credibility, iHeartMedia is not an independent third party with respect to its own awards; it is the interested awarding body. It is nonetheless the correct and reliable source here because (i) it is the definitional records-holder — a nomination simply is what iHeartMedia's official list says it is, so there is no more direct source available; (ii) it bears intense reputational and commercial pressure to publish accurately and on schedule, since the iHeartRadio Music Awards is a flagship iHeartMedia and Fox Entertainment franchise and a misstated nominee list would be contested immediately and publicly by the affected artists, labels, and radio programmers, many of whom independently track the same underlying airplay and streaming data; (iii) its published list is independently and instantly checkable against the publicly available Mediabase airplay data and streaming performance on which it is substantially based, and against the joint announcement and press-office distribution; and (iv) the list is transcribed and republished within minutes by the fallback sources below, providing redundancy against transcription or publication error in the primary channel.

The Associated Press

The Associated Press is a not-for-profit news cooperative founded in the mid-nineteenth century and owned by its member news organizations, and it operates one of the largest newsgathering operations in the world, with its reporting syndicated to thousands of outlets. The specific product relied upon here is the AP's published wire story reporting the nominees for the specified iHeartRadio Music Awards ceremony, as it appears on apnews.com or in syndication to AP member and subscriber outlets. AP's reporting is governed by its published statement of news values and principles, which requires verification against primary sources before publication; for an awards announcement of this kind, that means transcription directly from iHeartMedia's announcement and press materials, reviewed by desk editors before the wire moves. AP typically publishes within minutes of the announcement, on the same day, and its corrections policy appends a corrective note to the original story rather than silently altering the record, which preserves an auditable first-print. AP's news report is freely accessible on apnews.com and through countless member outlets; in any event, because AP sits behind the free primary source

in the hierarchy and the same fact is carried redundantly by the outlets below, no Member depends on a paid subscription to verify the Expiration Value. AP has no commercial relationship with or stake in which artists iHeartMedia names as nominees, its journalists are bound by its ethics policy, and its account of the nominees is corroborated by — not exclusive of — the other listed sources.

Bloomberg News

Bloomberg News is the editorial division of Bloomberg L.P., a privately held financial data and media company headquartered in New York and founded in the 1980s, and its output is relied upon by financial market participants worldwide. What is relied upon here is Bloomberg's published news story or terminal item reporting the nominees for the specified ceremony, as carried on bloomberg.com and on the Bloomberg Terminal. Bloomberg maintains an editorial standards function and a published code of conduct requiring verification against original sources and multi-layer editorial review prior to publication, standards developed principally for market-moving financial reporting and applied uniformly across its news desks. Bloomberg publishes same-day on announcements of this kind, and handles errors through appended corrections attached to the original item rather than untraceable revision. Bloomberg's web coverage is partly metered and its terminal content is by subscription; because Bloomberg sits well behind the freely available primary source and a number of freely available fallbacks, this poses no access barrier to verifying the Expiration Value. Bloomberg has no stake in iHeartMedia's nominee determinations, its journalists are subject to its editorial-independence and conflicts policies, and its reporting here is redundant with, rather than a substitute for, the other Source Agencies.

Reuters

Reuters is an international news agency founded in the mid-nineteenth century and now part of Thomson Reuters, operating a global network of journalists and supplying news to media, financial, and professional customers. The product relied upon is the Reuters wire story reporting the nominees for the specified ceremony, as published on reuters.com and distributed to Reuters clients. Reuters reporting is governed by the Thomson Reuters Trust Principles and its published handbook of journalism, which mandate independence, freedom from bias, and sourcing to original documents or direct observation, with editorial review before the wire moves. Reuters files same-day on awards announcements, and its corrections practice issues a corrective that is linked to and preserved alongside the original story rather than quietly overwriting it. Reuters.com is freely accessible for news of this kind, and in any case its position in the hierarchy behind free sources means access is never a dependency. Reuters holds no commercial interest in the outcome of iHeartMedia's nominee determinations, its staff are bound by the Trust Principles, and its account is corroborated by the remaining Source Agencies.

The New York Times

The New York Times is a daily newspaper and digital publication founded in the mid-nineteenth century, published by the New York Times Company, a publicly traded corporation headquartered in New York, and it maintains a culture desk that covers the recording industry and its awards. The product relied upon is the Times's published article reporting the nominees for the specified ceremony, as it appears on nytimes.com and in the print edition. Times journalism is governed by its published ethical handbook and standards guidance, with verification against primary sources and layered desk and copy editing before publication. It publishes same-day on nominations announcements and appends a dated correction to the original article when an error is identified, leaving the original text and timestamp traceable. The Times operates a metered paywall; because it sits behind the free primary source and multiple free fallbacks in the hierarchy, and the same fact is reported redundantly across the list, a Member is not dependent on a Times subscription to verify the Expiration Value. The Times has no commercial relationship with iHeartMedia bearing on the nominations, its journalists are bound by its conflict-of-interest rules, and its reporting corroborates rather than displaces the other sources.

The Washington Post

The Washington Post, founded in the late nineteenth century and headquartered in Washington, D.C., is a daily newspaper and digital publication with a substantial arts and entertainment desk. Relied upon here is the Post's published article reporting the nominees for the specified ceremony, as carried on washingtonpost.com and in print. The Post's reporting is governed by its published standards and ethics policy, which requires attribution to original sources and editorial review, and its arts coverage follows the same verification discipline as its news desks. The Post publishes same-day on an announcement of this kind, and handles errors by appending a dated correction to the original article rather than silently amending it. The Post operates a metered paywall, which is immaterial to the Contract given its position behind free sources in the hierarchy and the redundancy of the underlying fact across the list. The Post has no stake in which artists are nominated, its journalists are bound by its ethics policy, and its account operates as corroboration of the primary record.

CNBC

CNBC is a business news network launched in the late 1980s, distributing content through cable and satellite television and through cnbc.com, and operates as part of Versant Media Group following its spin-off from NBCUniversal. The product relied upon is CNBC's published article or broadcast segment reporting the nominees for the specified ceremony. CNBC's journalism is

subject to established editorial standards, including verification against primary sources and standards-and-practices review, applied to its digital and on-air output alike. CNBC publishes same-day on announcements of this nature and appends corrections and editor's notes to the original digital item. Cnbc.com's news content is largely freely accessible; regardless, its placement in the hierarchy means no Member depends on it for access. CNBC has no commercial stake in iHeartMedia's nominee determinations, its journalists are bound by applicable editorial-independence policies, and its reporting is one of several redundant corroborating accounts.

BBC

The BBC is the United Kingdom's public service broadcaster, established by royal charter in the 1920s and funded principally by the licence fee, operating one of the largest newsgathering organisations in the world across television, radio, and online. Relied upon here is the BBC's published news article or broadcast item reporting the nominees for the specified ceremony, as carried at bbc.com or bbc.co.uk. BBC journalism is governed by the BBC Editorial Guidelines, an unusually detailed published code administered by an internal editorial policy unit and overseen by the BBC Board, requiring accuracy, verification against primary sources, and due impartiality. The BBC publishes same-day on major music-industry announcements, and its corrections and clarifications practice records amendments publicly rather than making them invisibly. BBC News online is free to access without subscription or login. The BBC has no commercial relationship with iHeartMedia, its staff are bound by the Editorial Guidelines and associated conflict rules, and its account corroborates the primary record alongside the other listed sources.

ABC

ABC is a United States broadcast television network founded in the 1940s and owned by the Walt Disney Company, with a national news division producing daily news programming and digital reporting at abcnews.go.com. The product relied upon is ABC News's published article or broadcast segment reporting the nominees for the specified ceremony. ABC News operates under Disney's and ABC News's editorial standards and practices function, which reviews sourcing and verification prior to publication or broadcast, and it appends corrections to the original digital record. ABC has no commercial relationship with or stake in iHeartMedia's nominee determinations, and ABC News's digital reporting is freely accessible without subscription.

CBS

CBS is a United States broadcast television network founded in the 1920s, operated as part of its parent media company, with CBS News producing national news programming and digital

reporting at cbsnews.com. Relied upon here is CBS News's published article or broadcast segment reporting the nominees for the specified ceremony. CBS News is governed by its own standards and practices function, which requires sourcing to original materials and editorial review prior to publication, and corrections are appended to the original digital item. CBS has no commercial relationship with or stake in iHeartMedia's nominee determinations, and CBS News's digital reporting is freely accessible without subscription.

CNN

CNN is a cable and digital news network launched in 1980 and operated as part of Warner Bros. Discovery, with a global newsgathering operation and a substantial entertainment desk. The product relied upon is CNN's published article or broadcast segment reporting the nominees for the specified ceremony, as carried on cnn.com. CNN's reporting is subject to its published editorial standards and an internal standards-and-practices review, requiring verification against primary sources before publication. CNN publishes same-day on announcements of this kind and appends editor's notes and corrections to the original item rather than silently revising it. Cnn.com's core news coverage is freely accessible. CNN has no stake in iHeartMedia's nominee determinations, its journalists are bound by its ethics policy, and its account is corroborative rather than exclusive.

Fox News

Fox News is a United States cable and digital news network launched in 1996 and operated by Fox Corporation, with a national newsgathering operation and an entertainment vertical at foxnews.com. Relied upon here is Fox News's published article or broadcast segment reporting the nominees for the specified ceremony. Fox News's news reporting is subject to internal editorial standards and review, with sourcing to iHeartMedia's own announcement and press materials for a factual list of this kind, and corrections are appended to the original digital record. Candor is appropriate here: Fox Corporation, Fox News's parent, is also the parent of Fox Entertainment, which broadcasts and co-presents the iHeartRadio Music Awards ceremony, so Fox News has a corporate affiliation bearing on the awards program; that affiliation does not bear on the accuracy of a transcribed nominee list, Fox News operates under a separate editorial standards and practices function from Fox Entertainment's programming and production operations, Fox News sits low in the hierarchy behind the free primary record and numerous unaffiliated sources, and its account is redundant with the rest of the list. Its digital news content is freely accessible without subscription.

MS Now

MS Now is the United States cable and digital news network formerly known as MSNBC,

operating under new ownership following the separation of its cable networks from NBCUniversal, and it maintains a national newsgathering and digital publishing operation. The product relied upon is MS Now's published article or broadcast segment reporting the nominees for the specified ceremony. Its reporting is governed by its editorial standards and review function, with factual announcements of this kind sourced directly to iHeartMedia's announcement and press materials, and corrections appended to the original digital item. Its digital news content is freely accessible. MS Now has no commercial stake in iHeartMedia's nominee determinations, and its reporting corroborates rather than substitutes for the sources above it in the hierarchy.

NBC

NBC is a United States broadcast television network founded in the 1920s and operated as part of NBCUniversal, with NBC News producing national news programming and digital reporting at nbcnews.com. Relied upon here is NBC News's published article or broadcast segment reporting the nominees for the specified ceremony. NBC News operates under NBCUniversal News Group editorial standards, including verification against primary sources and standards review prior to publication or broadcast, and appends corrections to the original digital record. NBC has no commercial relationship with or stake in iHeartMedia's nominee determinations bearing on this Contract, and NBC News's digital reporting is freely accessible without subscription.

The Wall Street Journal

The Wall Street Journal is a daily business-focused newspaper and digital publication founded in the late nineteenth century, published by Dow Jones & Company, a subsidiary of News Corp, and widely relied upon by financial market participants. The product relied upon is the Journal's published article reporting the nominees for the specified ceremony, as it appears on wsj.com and in print. Journal reporting is governed by the Dow Jones code of conduct and the Journal's own standards, requiring verification against original sources and layered editorial review; its media and entertainment coverage applies the same discipline as its financial desks. It publishes same-day on announcements of this kind and appends dated corrections to the original article. The Journal operates a paywall; because it sits at the bottom of the hierarchy behind the freely available primary source and numerous freely available fallbacks, and because the underlying fact is reported redundantly throughout the list, no Member is dependent on a Journal subscription to verify the Expiration Value. The Journal has no commercial stake in iHeartMedia's nominee determinations and its account serves as a final layer of corroboration.

Because Appendix A lists these Source Agencies hierarchically, with iHeartMedia as the operative primary source and the fourteen wire services, newspapers, and broadcasters as

successive fallbacks, the Expiration Value will ordinarily be determined from iHeartMedia's own free, publicly available official list of nominees, with the fallback sources called upon only if the primary source is unavailable, ambiguous, or contradicted, and their redundancy providing an additional layer of protection against error or manipulation in the primary source. In summary, iHeartMedia's own official list of nominees will be used to determine the Expiration Value of the Contract, and independently corroborated as needed by the Associated Press, Bloomberg News, Reuters, the New York Times, the Washington Post, CNBC, BBC, ABC, CBS, CNN, Fox News, MS Now, NBC, and the Wall Street Journal, in a rigorous manner with multiple layers of checks in place to ensure the highest accuracy possible, and there are robust safeguards against any potential manipulation.

APPENDIX E (CONFIDENTIAL) – COMPLIANCE WITH CORE PRINCIPLES

Compliance with Core Principles

The Exchange has conducted a comprehensive analysis of the designated contract market core principles (“Core Principles”) as set forth in Part 38 of the Act. The Core Principles relevant to the Contract are outlined and discussed in further detail below:

Core Principle 2 - Compliance with Rules and Impartial Access: The Exchange has adopted the Rulebook, which provides the requirements for accessing and trading on the Exchange. Pursuant to Chapters 2, 3, and 5 of the Rulebook, in utilizing the Exchange’s services, all Members must comply with the rules of the Rulebook (“Rules”), cooperate with Exchange investigations, inquiries, audits, examinations and proceedings, and engage in conduct consistent with just and equitable principles of trade. Chapter 3 of the Rulebook also provides clear and transparent access criteria and requirements for Exchange Members. Trading the Contract will be subject to all the rules established in the Rulebook, which are aimed at enforcing market integrity and customer protection.

In particular, Chapter 5 of the Rulebook sets forth the Exchange’s Prohibited Transactions and Activities and specifically prescribes the methods by which Members trade contracts, including the Contract. Pursuant to Rule 3.6, each Member is required to cooperate promptly and fully with an Exchange investigation by providing access to information on the activities of the Member in any referenced market, which includes books and records of trading. Pursuant to Rule 9.2, the Exchange may compel testimony, subpoena documents, and require statements under oath from any Member. As described in Rule 9.1, the Exchange conducts trade practice surveillance, market surveillance, and real-time market monitoring to ensure that Members adhere to the Rules of the Exchange. The Exchange, through the compliance department, initiates review and, where appropriate, investigates unusual trading activity. The compliance department also investigates any time it has other reason to believe that inappropriate activity of any sort is taking place on the Kalshi Platform or its website.

Core Principle 2 also stipulates that an exchange shall establish means to provide market participants with impartial access to the market. Chapter 3 of the Rulebook, and Rule 3.1 in particular, provides clear and transparent access criteria and requirements for Members. The Exchange will apply access criteria in an impartial manner, including through the application process described in Rule 3.1.

Core Principle 3 - Contract not Readily Subject to Manipulation:

Core Principle 3 and Rule 38.200 provide that a DCM shall not list for trading contracts that are readily susceptible to manipulation. The Exchange's marketplace and contracts, including this Contract, have been designed in accordance with this fundamental principle. The Exchange maintains various safeguards against outcome manipulation and other forms of manipulation, including, (i) real-time market monitoring, automated trade surveillance, and suspicious behavior detection, (ii) Rulebook prohibition, Member certification, and notification, (iii) Member monitoring and know-your-customer verification, and (iv) sanctions. These safeguards render the Contract not readily susceptible to manipulation.

(i) Real-time market monitoring, automated trade surveillance, and suspicious behavior detection: Kalshi conducts real-time market monitoring of all trading activity on the Exchange to identify disorderly trading and any market or system anomalies. As described in Rule 5.11, Kalshi has the authority to adjust trade prices or cancel trades when necessary to mitigate market disrupting events caused by malfunctions in its electronic trading platform or errors in orders submitted by members and market participants. Any trade price adjustments or trade cancellations must be transparent to the market and subject to standards that are clear, fair, and publicly available. Kalshi also maintains an automated trade surveillance system capable of detecting and investigating potential trade practice violations. The automated system loads and processes orders and trades as they occur on the Exchange (well within 24 hours after the completion of the trading day stated in Commission Regulation 38.156). The automated trade surveillance system has the ability to detect and flag specific trade execution patterns and trade anomalies; compute, retain, and compare trading statistics; compute trade gains, losses, and positions; reconstruct the sequence of market activity; perform market analyses; and support system users to perform in-depth analyses and ad hoc queries of trade-related data. As described in Rule 9.2(a), Kalshi's Compliance Department investigates unusual trading activity or other activity that the Compliance Department has reasonable cause to believe could constitute a violation of Kalshi's Rules, or upon the receipt of a request from Commission staff. The Exchange disciplinary process is conducted in accordance with Chapter 9 of the Exchange Rulebook, and penalties may be imposed in accordance with Rule 9.5.

(ii) Rulebook prohibition, member certification and notification: The Exchange's Rulebook includes various provisions that prohibit manipulative behaviors. As noted above in the discussion of Core Principle 2, the Exchange's Rulebook gives the Exchange the authority to investigate potential violations of its rules. Pursuant to Rule 3.6, each Member is required to cooperate promptly and fully with an Exchange investigation by providing access to information on the activities of the Member in any referenced market, which includes books and records of trading. Pursuant to Rule 9.2, the Exchange may compel testimony, subpoena documents, and require statements under oath from any Member. The Exchange's Surveillance Officers, which operate within the Compliance Department, perform trade practice surveillance and real-time market monitoring to ensure that Members adhere to the Exchange's rules. The Rulebook also

imposes sanctions on Members who break rules. Potential penalties include fines, disgorgement, and revocation of membership in Kalshi. Only Members are allowed to trade on the Exchange, and the Exchange requires its Members to strictly comply with the Rulebook. Members cannot complete the account creation process and trade on the Exchange until they certify that they have read the Exchange's rules and agree to be bound by them.

In addition, prior to trading, the Exchange requires Members to represent and covenant that the Member will not trade on any contract where they have access to material non-public information, may exert influence on the market outcome, or are an employee or affiliate of the Source Agency. In order to further reduce the potential for manipulation, the Exchange maintains a dedicated page on the trading portal that lists all the source agencies and their associated contracts, together with a warning that employees of those companies, persons with access to material non-public information, and persons with an ability to exert influence on the underlying of a contract are prohibited from trading on those contracts. This page is intended to serve as an effective means of raising Members' awareness of these rules and prohibitions, further reducing the potential for manipulation. Similarly, the Exchange places a prominent notice on each contract page that notifies Members of the prohibition on trading the Contract while employed by its Source Agency, trading the Contract on the basis of non-public information, and trading the Contract while having the ability to exert influence on the Contract's Market Outcome.

(iii) Member monitoring and know-your-customer verification ("KYC"): The Exchange has a robust KYC process. The KYC process is an important tool that helps flag and uncover higher risk traders before they become Members of the platform. The Exchange's KYC process ensures that the Exchange has access to all of its members' personal identifying information, and the Exchange can leverage this information as part of its surveillance and to ensure the overall fairness and integrity of its markets. During the application process, individual applicants are required to share personally identifiable information, such as their full legal name, social security number, date of birth, and address with the Exchange. Applicant information is run through a comprehensive set of databases that are actively compiled and maintained by an independent third party. The databases are utilized by the Exchange to identify applicants that are employees or affiliates of various governments and other agencies.

Additionally, as part of the KYC process for its individual members, the Exchange runs applicants through adverse media databases. The adverse media dataset is a real-time structured data feed of companies and individuals subject to adverse media. Monitoring thousands of news sources, business and trade journals, in addition to local, regional and national newspapers, the adverse media feed isolates and highlights any entities or individuals subject to a range of adverse media. The Exchange utilizes the database to trigger enhanced due diligence, because applicants with adverse media may be more likely to engage in certain types of unlawful activity including market manipulation.

(iv) Sanctions: Exchange Members must agree to the terms and conditions of the Exchange's Rulebook before being allowed to trade. As a result, Members are subject to disciplinary actions and fines for engaging in improper market conduct that is prohibited by the Exchange's Rulebook. In the event that suspicious trading activity is detected and results in an investigation initiated by the Exchange, market participants are required to provide the Exchange with information relevant to the scope of the investigation under Rule 3.6. Chapter 9 of the Exchange's Rulebook details the process for discipline and rule enforcement. Disciplinary action can range from a letter of warning to fines to referral to governmental authorities that can result in criminal prosecution.

In addition to these global policies and safeguards, there are a number of contract specific attributes and considerations that render the Contract not readily susceptible to manipulation.

The Underlying for the Contract is the number of nominations received by <artist> at <iHeartRadio Music Awards ceremony>, as announced by iHeartMedia, and the Payout Criterion is satisfied where that number is <above/below/exactly/between/at least> <count>. Two categories of actor bear on this Underlying: (1) the operational actors who determine nominees — iHeartMedia's programming and awards staff who compile and verify radio airplay, streaming, and engagement data, including data monitored through iHeartMedia's own Mediabase subsidiary, and who apply iHeartMedia's published methodology to identify nominees in each category over a fixed eligibility period; and (2) the ownership, management, and communications actors who control the Primary Source Agency — iHeartMedia's executive leadership, awards administration, and communications functions, together with Fox Entertainment as co-presenting partner, which publish the official list of nominees through iHeartRadio, iHeartMedia's press office, and the joint nominee announcement.

No single individual can unilaterally manufacture or suppress the number of nominations received by <artist> at <iHeartRadio Music Awards ceremony>. The outcome depends on multiple independently constrained inputs controlled by different personnel and different institutions: radio airplay data is monitored through Mediabase across more than a thousand reporting stations, many of which are not owned by iHeartMedia; streaming and application-engagement data is generated by listener activity that iHeartMedia's awards staff does not control; and the resulting nominee list is derived by applying a methodology published in advance to that audited, externally generated data rather than by discretionary selection. No one of these actors sets the result, and the underlying airplay and streaming data is independently observed and republished by other radio monitoring services, streaming platforms, and record labels with no stake in the Contract. The detectability of any falsification is also close to total, because both the underlying airplay and streaming performance and the nominee announcement itself are real, externally observable public events: airplay figures are independently visible to

record labels, radio programmers, and competing monitoring services, and the nominee list is distributed simultaneously through iHeartMedia's press office and the joint announcement with Fox Entertainment, so a list that misstated whether or in how many categories a given artist had been nominated would be immediately and trivially contradicted by the artists and representatives named or omitted, by the labels and radio programmers whose airplay data underlies the result, and by the trade and general press that transcribe the announcement in real time. This public-facing verification step is a structural check that operates independently of anything the Source Agency chooses to publish.

iHeartMedia's own commercial, institutional, legal, and reputational stakes in the integrity of its nominee determinations dwarf any conceivable gain from trading the Contract. The iHeartRadio Music Awards is one of iHeartMedia's flagship promotional and advertising properties, and its commercial value — its Fox Entertainment broadcast partnership, its sponsorship and advertising revenue, its standing as a leading source of radio airplay and audience-engagement data through Mediabase, and its relationships with the record labels and artists whose participation the ceremony depends on — rests entirely on the perceived accuracy and integrity of its nominee determinations. The individuals involved face correspondingly severe personal exposure: an iHeartMedia programming employee, awards administrator, or communications staff member who falsified or leaked a nominee list, or manipulated the underlying airplay or streaming data, would face immediate termination, permanent exclusion from the radio and music-data industry, and potential civil and regulatory liability given the commercial reliance record labels, radio stations, and advertisers place on iHeartMedia's data and awards integrity. Those incentives already point squarely toward publishing the audited result accurately and on the announced schedule, and they cut against error in either direction: inflating an artist's nomination count and suppressing it are both instantly visible to the affected parties and both carry the same career, legal, reputational, and commercial consequences, which are of an entirely different order of magnitude than any gain available from a position in the Contract. Nothing about the Contract's existence plausibly alters iHeartMedia's incentive to determine and report nominations accurately.

Detection. The announcement of iHeartRadio Music Awards nominees is a high-salience, closely watched event within the music industry and the broader entertainment press, covered contemporaneously and independently by music trade publications, general-interest entertainment press, wire services, broadcast and cable news networks, and radio-industry and chart-data outlets that independently track the same underlying airplay and streaming data, in addition to iHeartMedia's own official channels and joint nominee announcement with Fox Entertainment. Nomination tallies are published, compared, and scrutinized by these outlets within minutes of the announcement, and any discrepancy between iHeartMedia's posted list and the list as announced or as reported elsewhere — or as implied by the publicly observable airplay and streaming data underlying it — would surface immediately. This redundant,

contemporaneous third-party reporting, together with the Exchange's real-time surveillance and its authority under Rule 7.1 to review the Market Outcome before Settlement, makes a false or manipulated report readily detectable.

Source-record integrity is addressed separately from outcome manipulation. If iHeartMedia's official channel were temporarily erroneous, unavailable, or compromised — for example, if iHeart.com or news.iheart.com were inaccessible at the time of the announcement, or if an unauthorized or erroneous list were briefly posted and then disavowed — the Contract's Source Agency hierarchy in Appendix A provides for resolution by reference to the corroborating wire services, newspapers, and broadcasters listed as fallback sources, consistent with the Source Agency methodology set out in Appendix D. Any lingering discrepancy between the Source Agency record and the nominations as actually determined and announced by iHeartMedia is subject to review and correction by the Exchange under Rule 7.1 prior to Settlement.

It is unlikely that the existence of the Contract could affect the incentives of any relevant parties given the enormous stakes of the Underlying and the high level of scrutiny applied to its outcome.

Further, as part of the Exchange's KYC verification and monitoring system, the Exchange also cross-checks applicants against comprehensive databases. In particular, the Exchange will check whether any Members trading on this Contract are on databases of Politically Engaged Persons. The Exchange further cross checks applicants against databases of family members and close associates of Politically Engaged Persons. These checks help to further reduce the potential for trading violations and further increase the integrity of this Contract.

Core Principle 4 - Prevention of Market Disruption: Trading in the Contracts will be subject to the Rules of the Exchange, which include prohibitions on manipulation. Trading activity in the Contract will be subject to monitoring and surveillance by the Exchange's Market Surveillance Department. In particular, the Exchange's trade surveillance system monitors the trading on the Exchange to detect and prevent activities that threaten market integrity and market fairness including manipulation, price distortion, and disruptions of the settlement process. The Exchange also performs real-time market surveillance. The Exchange sets position limits, maintains both a trade practice and market surveillance program to monitor for market abuses, including manipulation, and has disciplinary procedures for violations of the Rulebook.

Core Principles 7 and 8 - Availability of General Information and Daily Publication of Trading Information: Core Principles 7 and 8, implemented by Regulations Sections Subsections 38.400, 38.401, 38.450, and 38.451, require a DCM to make available to the public accurate information regarding the contract terms and conditions, daily information on contracts such as settlement price, volume, open interest, and opening and closing ranges, the rules, regulations, and mechanisms for executing transactions on or through the facilities of the

contract market, and the rules and specifications describing the operation of the contract market's electronic matching platform.

Rule 2.17 of the Rulebook sets forth the rules for publicizing information. The Rulebook and the specifications of each contract are made public on the Exchange website and remain accessible via the platform. The Exchange will post non-confidential materials associated with regulatory filings, including the Rulebook, at the time the Exchange submits such filings to the Commission. Consistent with Rule 2.17 of the Rulebook, the Exchange website will publish contract specifications, terms, and conditions, as well as daily trading volume and open interest for the Contract. Each contract has a dedicated "Market Page" on the Kalshi Exchange platform, which will contain the information described above as well as a link to the Underlying used to determine the Expiration Value of the Contract. Chapter 5 sets forth the rules, regulations and mechanisms for executing transactions, and the rules and specifications for Kalshi's trading systems.

Core Principle 11 - Financial Integrity of Transactions: Each Member must be in good standing and in compliance with the Member eligibility standards set forth in Chapter 3 of the Rulebook. All contracts offered by the Exchange, including the Contract, are cleared through the Clearinghouse, a Derivatives Clearing Organization ("DCO") registered with the CFTC and subject to all CFTC Regulations related thereto. The Exchange requires that all trading be fully cash collateralized. As a result, no margin or leverage is permitted, and accounts must be pre-funded. The protection of customer funds is monitored by the Exchange and ensured by the Clearinghouse as "Member Property."

All Remaining Requirements: All remaining Core Principles are satisfied through operation of the Exchange's Rules, processes, and policies applicable to the other contracts traded thereon. Nothing in this contract requires any change from current rules, policies, or operational processes.