Franklin Holdings, LLC
Digital Asset Staking and Liquidity Risk Management Policies & Procedures

A. Introduction:

The staking and liquidity risk management policies and procedures herein (the "Staking Policy") sets forth the policies and procedures of Franklin Holdings, LLC (the "Sponsor") with respect to the staking of digital assets held by certain exchange-traded products that it sponsors (each, a "Fund"), as listed in Exhibit A. The Staking Policy is intended to comply with the generic listing standards set forth in NYSE Arca Rule 8.201-E(g) (Generic), and, as applicable, comparable rules from other listing exchanges. Rule 8.201-E(g) states that if a Fund has on a daily basis less than 85% of its assets readily available to meet redemption requests, the Fund must have written liquidity risk policies and procedures reasonably designed to address the risk that it could not meet requests to redeem shares issued by the Fund without significant dilution of remaining shareholders' interest in the Fund.[1] Staking involves the temporary loss of the ability to transfer or dispose of the staked digital asset. The Staking Policy is designed to manage staking-related liquidity risks, but these risks cannot be fully eliminated, especially in extreme or stressed market conditions or in the event that the Fund or its service providers experience operational disruptions. Capitalized terms not otherwise defined herein shall have the meanings assigned to them in the Fund's prospectus.

B. The Fund's Staking Program

The Fund will retain a portion of the gross Staking Rewards (as defined below) earned through its Staking Activities, denominated in additional tokens of the Fund's staked digital asset(s), in the manner and amount as specified in the Fund's prospectus. The expenses incurred in connection with staking the Fund's digital asset(s) will be paid from the proceeds of the Staking Rewards received by the Fund. Specifically, the Fund will pay an aggregate fee as described in its prospectus out of the gross Staking Rewards and will retain the remainder of the Staking Rewards after payment of the Staking Expenses, which are paid from the proceeds of the staking program received by the Fund. Any Staking Rewards earned by the Fund from Staking Activities will accrue to the Fund's account with the Custodian for the staked asset (the "Custodian") and will generally be staked in the same manner as the Fund's existing holdings. The staking process includes protocol-defined warm-up, activation and withdrawal periods, during which staked digital assets are temporarily illiquid and inaccessible to the Fund. These phases affect when the staked asset begins earning rewards, participates in consensus and becomes available for transfer or redelegation by the Fund, including to meet its redemption obligations.

The Fund will maintain control of the applicable digital asset while it is staked because it will remain in the Fund's account with the Custodian (*i.e.*, it will be kept in a separate account for which the Fund is the beneficial and record owner and will not be commingled with the Custodian's other client accounts) and the Fund will retain the ability to direct the un-staking

---

[1] An asset is deemed not readily available to meet redemption requests if it is segregated, pledged, hypothecated, encumbered or otherwise restricted or prevented from being liquidated, sold, transferred, or assigned within one business day. The Sponsor expects that the Fund's staked assets will generally be considered not readily available to meet redemption requests.

of the digital asset while the Staking Provider(s) will not have this capability. The Fund will not participate in the operation of the staking program. The Fund's role will be passive and limited to, via the Sponsor acting on its behalf, determining which Staking Provider(s) with which to enter into a written agreement and instructing the Staking Provider(s) on when to stake and/or un-stake the Fund's digital asset(s).

Additionally, a Fund may refrain from staking some or all of its digital asset(s) if, in the Sponsor's determination, staking would interfere with the Fund's ability to continue to satisfy the Staking Requirement or any other applicable legal requirement, or in other exceptional circumstances such that staking would interfere with the security or liquidity risk management of the Fund's digital asset holdings. Such circumstances may include, inter alia, changes involving the Fund's Custodian or Staking Provider(s), regulatory or legal developments affecting the Fund's ability to stake, or extreme or stressed market conditions.

The Fund will not acquire and will disclaim any Incidental Right or Incidental Right asset received, for example as a result of forks or airdrops, and such assets will not be taken into account for purposes of determining NAV. The Sponsor, on behalf of the Fund, intends to liquidate Staking Rewards for cash to be distributed to shareholders quarterly.

i. Franklin Solana ETF:

The Franklin Solana ETF seeks to reflect generally the performance of the price of Solana and rewards from staking as much of the Fund's Solana as is practicable (i.e., up to 100%) ("Staking Rewards") to the extent the Sponsor in its sole discretion determines that the Fund may do so without undue legal or regulatory risk, such as without limitation, by adversely affecting the Fund's status as a grantor trust for U.S. federal income tax purposes (the "Staking Requirement"). The Sponsor generally seeks to stake as much of the Fund's Solana holdings as is practicable through one or more Staking Providers at all times. The Fund may hold unstaked Solana to pay the Sponsor's Fee and other Fund expenses or liabilities, to liquidate Staking Rewards for cash to be distributed to shareholders quarterly, or to facilitate creation and redemption activity, including to satisfy existing or anticipated redemption requests, or as otherwise described herein and/or in the Fund's registration statement.

C. Managing the Liquidity of the Fund's Assets

The Sponsor evaluates the liquidity of the Fund's digital assets under both normal and stressed conditions through a comprehensive monitoring framework that covers staking mechanics, network performance, and market dynamics. This includes tracking epoch timing, validator health, staking rewards, and the digital asset's overall network status, as well as monitoring broader market indicators such as trading activity and price volatility. The Sponsor also considers operational risks related to validator performance, potential slashing, protocol requirements, and network congestion, while reviewing historical redemption patterns under varying market conditions.

The Sponsor reviews, as applicable, (i) the Fund's investment strategy and liquidity of the Fund's assets during normal and stressed conditions, including holdings in derivatives and whether the investment strategy is appropriate for effective and efficient arbitrage, (ii) holdings of cash and cash equivalents, as well as borrowing arrangements and other funding sources; and (iii) percentage and description of the Fund's assets that are staked or otherwise segregated, pledged, hypothecated, encumbered, or otherwise restricted or prevented from being liquidated, sold, transferred or assigned. The Fund will not utilize leverage, derivatives or similar instruments or transactions in seeking to meet its investment objective. The Fund may reduce the amount of the digital assets that it has staked as part of managing its liquidity.

i. Staking of Solana:

For the staking of Solana, the Sponsor expects that under normal conditions, the Fund will generally regain complete control over the Fund's Solana within two to three calendar days of instructing the Custodian to unstake or "exit" a Fund's staked Solana positions. However, there can be no guarantee that such process will result in the Fund regaining complete control of its Solana in time to satisfy its current obligations. Accordingly, the Sponsor may consider a number of options to manage the liquidity of the Fund's assets in times of stress, including a temporary extension of the settlement timeline for redemption orders or a temporary suspension of redemption orders. Additionally, in the future, subject to the Sponsor receiving the necessary regulatory approval to utilize alternative means to engage in Staking Activities and advice from counsel that doing so should not cause undue legal or regulatory risk, such as without limitation, by adversely affecting the Fund's status as a grantor trust for U.S. federal income tax purposes, the Sponsor may seek to use or hold liquid staking tokens ("LSTs"). The Sponsor has not made a determination to hold or use LSTs on behalf of the Fund as of the date of this Staking Policy, as the Fund is currently not permitted to hold or use LSTs under the generic listing standards.

Redemption orders for Solana are generally expected to be settled on the trade date plus three (T+3) Business Days, unless an earlier settlement is practicable. On the date of the redemption order, the Fund may need to instruct the Custodian to unstake the applicable amount of Solana depending on the size of the order and the amount of the Fund's Solana that is staked at that time. It is possible that the Fund will be able to accommodate a shorter settlement period in certain cases, subject to the timing requirements of unstaking its Solana and related aspects of the settlement process. In the event the Fund has not been able to successfully unstake the Solana, or to successfully execute and complete settlement of a Solana transaction by the settlement date of the redemption order, settlement may be delayed.

D. Borrowing and Other Funding Sources

The Sponsor may rely on other means of managing liquidity such as the use of a credit facility or other borrowing arrangement (including a credit facility with the Sponsor or its affiliates acting as lender) in its sole discretion. Such borrowing arrangements would allow the Sponsor to borrow cash and/or liquid digital assets to satisfy redemption requests in a timely manner. The costs of any such borrowings will be paid by the Fund as disclosed in its prospectus. The digital assets or cash obtained through such borrowing arrangements are expected to be distributed, or included in a pool of assets expected to be distributed, within a relatively short period from when they are borrowed (generally within the T+3 settlement period).

E. Review and Selection of Staking Providers:

Staking Providers will be chosen based on cost, reputation, financial stability, and operational security, with a preference for Staking Providers with System and Organization Controls ("SOC") reports and/or ISO/IEC certifications. To the extent the Sponsor engages additional Staking Providers, the Sponsor will determine the amount of the applicable digital asset to allocate to each Staking Provider based on each Staking Provider's capabilities, service levels and operational performance indicators, including uptime and compliance with staking requirements.

F. Periodic Review of the Staking Policy, Amendments and Disclosures:

The Sponsor reviews the Staking Policy at least annually. Subject to the provisions of the applicable Fund's Agreement and Declaration of Trust, the Sponsor may amend the Staking Policy from time to time in its sole discretion to reflect changes in legal and/or tax guidance, the Fund's operations and relationships with service providers, general market practices, and other factors it determines to be appropriate. Material amendments will be disclosed in the Fund's periodic filings. To promote transparency, the Staking Policy will be made available to shareholders on the Fund's website.[2]

Last Updated: November 25, 2025

[2] *See*, NYSE Arca Rule 8.201-E(e)(6).

Exhibit A

Franklin Solana Trust—Franklin Solana ETF