

Complaints Procedure

Version 3.0 (Valid from: October 1, 2018)

1 Background

This Policy is based on the IOSCO Principles for Financial Benchmarks FR07/13, in particular Principle 16 “Complaints Procedures.”

2 Objective and Purpose

The objective of this Policy is to institute an internal process which ensures that:

- Stakeholders and clients can submit complaints and concerns in relation to Benchmark Administration;
- Complaints and concerns submitted by stakeholders and clients are handled promptly, efficiently and transparently;
- STOXX is able to assess whether the complaint is a result of procedural deficiency, carelessness or fraud and also any financial or reputational consequences of a complaint; and
- Structured documentation of the complaint is prepared and filed.

3 Scope

This Policy applies to all indices that are administered by STOXX.

Complaints, according to this Policy, refers to any written correspondence received from a client or other market participant, in which the client complains about any stage of the index determination process conducted by STOXX, covering areas such as:

- treatment of a corporate action;
- calculation errors;
- disputed free float or shares in issue/calculation figures;
- index review data incorrect;
- interpretation or application of an index rule;
- tax treatment including withholding taxes;
- significant delay of the publication of index data; or
- any other claim about the integrity of a benchmark.

In order for STOXX to consider the correspondence as a complaint under this Policy, the complainant must fully substantiate their claim with evidence and sufficient detail to enable a comprehensive investigation by STOXX. Where there is insufficient detail to pursue the investigation the complainant will be notified as such.

Concerns relating to technical problems, for example with the access to index data, are not treated as complaints under this Policy.

4 Dealing with Client Complaints

4.1 Submission of Complaints

Complaints can be submitted to STOXX by means of the following channels:

- **by postal mail/email to:**

STOXX Ltd.
Compliance Officer
Theilerstrasse 1A
6300 Zug
Switzerland
regulations@stoxx.com

or

STOXX Customer Support
customersupport@stoxx.com

In all cases, the complaint must include at a minimum the following information:

- The full name and contact address of the complainant and if applicable the company name and the contact address;
- A detailed description of the incident that led to the complaint and of the implications of the incident on the complainant (including all relevant background information);
- The index to which the complaint refers; and
- The date of the complaint.

A complainant may use the form provided in Annex 1 to submit a complaint.

A copy of all incoming complaints as defined above will be forwarded to STOXX's Compliance Officer together with the form "Complaint Report" (Annex 1). The Compliance Officer can decide about an escalation to the competent governance body.

Complainants will receive a confirmation upon receipt of the complaint by STOXX within five (5) business days and will be advised about the date by which they can expect to receive STOXX's answer to the complaint.

Annex 1

Complaint

Client name	
Date of the complaint	
Details	
Indices or services affected	

Enclosure:

Original Document to: - Compliance Officer
Copy to: - Oversight Committee