

STOXX Complaints Procedure

Version 4.0 (Valid from: February 2021)

1 Background

This Procedure is based on Art. 9 of Regulation (EU) 2016/1011 on indices used as Benchmark in financial instruments and financial contracts or to measure the performance of the investment funds (“BMR”) and on the Policy on Complaints management of Deutsche Börse Group as updated.

2 Objective and Purpose

The objective of this Procedure 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 assesses whether the complaint is a result of procedural deficiency, carelessness or fraud and also if any financial or reputational consequences of a complaint might occur; and
- A structured documentation of the complaint is prepared and filed.

3 Scope

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

Complaints, according to this Procedure, refer to any written correspondence received from a client or other market participant or stakeholders as defined by BMR and IOSCO, in which the complainant complains about any stage of the benchmark 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 that STOXX can consider the correspondence as a complaint under this Procedure, the complainant must fully substantiate their claim with evidence and sufficient level of detail to enable a comprehensive investigation by STOXX. Where there is insufficient detail to pursue the investigation, the complainant will be notified as such.

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;
- The rationale behind the complaint and the status of the complainant (client, market participants or other stakeholder)
- A detailed description of the incident that led to the complaint and of the implications of the incident on the complainant in line with the above (including all relevant background information);

- The index to which the complaint refers; and
- The date of the complaint.

To be eligible to make a complaint, a complainant must be seeking a remedy in respect of a financial loss or a measurable impairment of the complainant's business, which the complainant has suffered as a result of being directly affected by the addressed complaint / misconduct.

A copy of all incoming complaints as defined above will be forwarded to STOXX's Internal Investigator.

This Procedure must be read in line with the provisions of BMR and with the Deutsche Börse Policy on Complaints management in place.

4 Dealing with Complaints

4.1 Submission of Complaints

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

- **by postal mail:**

STOXX Limited
Customer Support
Theilerstrasse 1A
6300 Zug
Switzerland

- **or via email to**

STOXX Limited Customer Support
customersupport@stoxx.com

5. Internal Investigator

Once the complaint has been received, Customer Support shall immediately inform the Internal Investigator by email about the raised complaint.

STOXX Management Board has to appoint as **Internal Investigator** a senior employee who will treat the complaints in accordance to the present Procedure and STOXX internal governance.

The Internal Investigator has the responsibility to handle the complaint, identify possible conflicts of interest, evaluate if the complaint addresses structural failures or deficiencies, initiate mitigating measures for identified conflicts of interest, structural failures or deficiencies and act as a contact person to the complainant as well as to internal stakeholders.

The Internal Investigator will act in accordance to STOXX internal governance and escalate the complaint to the Index Governance Committee (IGC).

The external communication to the complainant will be conducted by the Internal Investigator.

The Internal Investigator shall have immediate access to all levels of related staff and management at any time. Further, the Internal Investigator shall enjoy the right to request from the involved parties a detailed

description of the behavior or other actions in relation to the complaint (including but not limited to: date/place of the complaint triggering event and, if possible, all persons/business areas involved in the event triggering the complaint).

5.1 Internal Investigator tasks and timeline

The Internal Investigator has to acknowledge the received complaint and give an indication of the process time to the complainant within 5 business days.

All complaints, their processing, the measures taken, and the final decisions will be systematically documented without unnecessary delay in a complaint register by the Internal Investigator.

The response to the complainant has to be made in writing using plain and clear language.

Payments for complaints seeking a financial remediation must be approved in line with the Signature Authority Policy of STOXX.

When providing a final decision that does not fully satisfy the complainant's demand, the Internal Investigator shall include a thorough explanation of the firm's position on the complaint and set out the complainant's option to maintain the complaint (e.g. availability of an ombudsman or alternative dispute resolution)

Complaints management Procedure will be published in an easily and accessible way on STOXX's website

6. Complaints register held by the Internal Investigator:

Complaints will be documented within the complaints register, stating at least:

- Contact details on the complainant
- Receiving date of the complaint
- Date of informing the complainant about the acknowledgement of the complaint
- The nature of the complaint
- The occurred financial loss or measurable impairment of the complainant's business
- Name of the Internal Investigator
- Decision on dealing with the complaint and related decision taking body
- Date of informing the complainant about the decision

Retention periods in accordance to the regulatory requirements applicable for the respective entity will have to be ensured for the complaints register.

Furthermore, a data deletion concept in line with the EU General Data Protection Regulation and supplementary national transpositions is implemented and followed for the personal data included in the complaints register.

7. STOXX Compliance function and Risk function

The Compliance Function and the Risk Function of GRC have the responsibility to oversee the operation of the complaints handling process and consider complaints as a source of relevant information to identify new or changed compliance risks.

The Compliance Function can conduct further controls based on the information derived from the received complaints. Information on received complaints, as well as on processing activities and decisions have to be provided by the Internal Investigator by email for information to the Compliance Officer and Risk Officer immediately.

8. Reporting

The Internal Investigator has to establish an annual reporting (end of Q4) on the complaints management to the Index Governance Committee (IGC) and other relevant stakeholder (e.g. Risk Control and Compliance Function). The reporting has to include at least a description of the complaint and the event triggering the complaint, the handling decision and (if identified), the conflicts of interest, structural failures or deficiencies recognized.