

STOXX Complaints Procedure

Version 4.1 (Valid from: 4 April 2022)

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 channel:

- via email to: Complaints@qontigo.com

5. Internal Investigator

Once the complaint has been received,

the Head of Governance, Risk and Compliance will appoint **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 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 5 business days upon receipt.

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.

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.

Complaints management Procedure will be published in an easily and accessible way on Qontigo'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

A 10-year retention period will be ensured for the complaints register.

7. Compliance function

The head of Qontigo GRC will oversee the complaints handling process by the assigned internal investigator.

8. Risk function

A member of the Qontigo GRC team will have the responsibility of evaluating whether the received complaint presents a new risk or indicates a change to a current risk. This includes the identification of Operational, Business, Financial and Compliance risks. Identified risks will be either mitigated, accepted, or considered within the internal control framework. Information collected around the complaint will be provided by the assigned internal investigator.

9. 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 and Compliance Committee). 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.