S&P Dow Jones Indices

A Division of S&P Global

Complaints Handling Policy

S&P Dow Jones Indices LLC, a division of S&P Global ("S&P DJI") strives to provide information of the highest standards to its customers and to conduct its business with integrity. In order to facilitate achievement of those standards in benchmark determinations, S&P DJI provides a mechanism by which stakeholders may submit complaints on a variety of matters, including:

- the application of a methodology to a specific benchmark determination,
- whether or not the benchmark determination is representative of the underlying interest it seeks to measure, or
- other administrator decisions in relation to a benchmark determination.

In order to raise a complaint, a stakeholder may:

- Call or email any of their existing contacts within S&P DJI's Client Coverage or Product Management Groups,
- Contact S&P DJI's Client Services Group in his/her respective region, or
- Utilize our online form

S&P DJI maintains a Complaints Policy and Procedure by which anyone may submit an issue relating to any of our products or services. If S&P DJI deems that the issue rises to the level of a complaint under its policy, the procedures to be followed are:

- All complaints will be acknowledged in writing by S&P DJI within three (3) business days of receipt.
- S&P DJI will assign an individual to investigate any complaint and determine an appropriate
 course of action. Any complaint involving an employee or his/her work will be investigated by
 the appropriate department within S&P DJI or S&P Global, which may include the employee's
 next level of management, the Compliance Department, Human Resources or the S&P Global
 Legal Department as appropriate.
- S&P DJI will seek to resolve the complaint as quickly as possible. In most cases, S&P DJI will provide a written response to the complainant within forty five (45) days from the date of receipt of the complaint explaining any course of action being taken or recommended by S&P DJI. However, if the scope of the complaint demands further investigation after forty five (45) days, S&P DJI will write to the complainant explaining why the matter has not been resolved and indicating when a final response is likely to be made.
- Where a complaint regarding the application of a methodology is determined by S&P DJI to be valid, S&P DJI reserves the right to take whatever actions it deems appropriate including not restating the index in question.
- S&P DJI retains all information pertaining to each complaint for a minimum period of at least five (5) years.