

Summary for Governance Website Publication – Complaints Handling Policy

Submitting a Formal Index Complaint

Nasdaq Global Indexes, a division of Nasdaq, Inc. (“Nasdaq”) 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 index determinations, Nasdaq provides a mechanism by which clients, market participants, or other persons may submit a complaint.

Any subscriber and other person or entity that has an interest in contracts or financial instruments that reference a Benchmark may submit a complaint via a web-based complaint [form](#) or call or email Nasdaq’s Index [Client Services Team](#). However, to ensure that a person who submits a formal complaint by calling or emailing provides all necessary information, Nasdaq may require that person to follow up on the initial complaint with a written submission through the web form. If a complaint does not include sufficiently detailed information, we may not be able to investigate or process it. Such minimum information includes:

- the full name of the complainant;
- company name (if applicable);
- a description of the complaint, including the name of the index, the date of the issue, and a detailed description of the issue and its impact.
- reference to the legal agreement or the financial instrument to which the complaint is related.

All complaints received through the methods describe above will be acknowledged by Client Services via email within five (5) business days of receipt.

Compliance Investigation of Formal Index Complaints

Nasdaq has a number of procedures in place to ensure that formal index complaints are conducted in a timely and fair manner.

- Compliance staff for Nasdaq Global indexes will investigate the complaint.
- The complaint will be escalated as appropriate within Nasdaq, consistent with the nature and subject matter of the complaint.

If, as a result of the investigation, a material change to an index is warranted, the change will be publicly announced before it is implemented. The complainant will not be notified of the change before it is publicly announced.

The information provided by the complainant may be used throughout the investigation and reporting processes, and, as such, may not be kept confidential (in particular, in connection with any related legal, regulatory, or other types of proceedings). Nasdaq will endeavor to resolve all complaints within forty-five (45) days of receipt. Client Services will notify the complainant in writing (via email) within that time frame regarding the outcome of the investigation, or otherwise inform the complainant about the fact that the scope of the complaint requires further investigation.