

FTSE Russell Benchmark Determination Complaints-Handling Policy

v2.7



Contents

Section 1 Introduction	3
Section 2 Principles	4
Section 3 Procedure	5
Section 4 Further information	6

Section 1

Introduction

1. Introduction

- 1.1 FTSE Russell always seeks to provide products and services to a high standard. We take all inquiries and complaints seriously and strive to resolve them satisfactorily as quickly as possible. All inquiries and complaints relating to any service or product issue are recorded and managed via the FTSE Russell Client Service team, who can be contacted at info@ftserussell.com or via the telephone on the numbers provided on <https://www.lseg.com/en/ftse-russell>.
- 1.2 This document sets out the procedure FTSE Russell will follow in the event of a complaint being received. A complaint may relate to any aspect of the services provided by FTSE Russell including the benchmark determination process. Examples may include: whether a specific benchmark is representative of market value, on a proposed change to the benchmark, on an application of the methodology in relation to a specific benchmark, and on other decisions in relation to the benchmark determination process.

Section 2

Principles

2. Principles

The following principles apply to all complaints including those related to benchmark determination raised with FTSE Russell:

- 2.1 All investigations of a complaint raised by any party to FTSE Russell must be handled in a fair and timely manner;
- 2.2 The inquiry into a complaint is conducted by parties independent of those involved in the subject of the complaint;
- 2.3 Resolution of the complaint will be communicated to the third party raising it, once the FTSE Russell decision has been approved;
- 2.4 No complaint should be closed without the party raising the complaint confirming that it has been properly addressed in accordance with this policy; and
- 2.5 All records and correspondence relating to any complaints, queries or issues must be kept by FTSE Russell for five years.

Section 3

Procedure

3. Procedure

- 3.1 If an index user, market participant, index constituent or other party wishes to raise a complaint regarding services provided by FTSE Russell they should first contact the FTSE Russell Client Services team at info@ftserussell.com and detail the basis for their complaint.
- 3.2 On receipt of a complaint, the FTSE Russell Client Services team will:
 - 3.2.1 Escalate the issue to the relevant department best placed to address the complaint and ensure they have all the information provided relating to it.
 - 3.2.2 Confer with the complainant if necessary to ensure the nature of the inquiry or complaint is fully understood. FTSE Russell will seek to acknowledge receipt of the complaint within one business day.
- 3.3 The resolution time for a complaint will vary according to the nature of the issue and the level of investigation it may require. The FTSE Russell Client Services Team will provide regular updates as to the status of the issue and anticipated timescales to resolution.
- 3.4 Once the final resolution has been determined that a recalculation or reissue of data is required, a client notice will be issued to all affected users detailing the decision. After this has been sent, a member of the FTSE Russell Client Services team or account manager will contact the complainant with the outcome of their complaint.
- 3.5 In all cases of a complaint, a written response will be provided to the complainant by the FTSE Russell Client Service team. In the event that the complainant disagrees with such decision or considers there are grounds for appeal (as detailed in the [Appeals Against Decisions](#) document), the issue will be escalated to the Chair of the Index Governance Board and the matter will be debated by the FTSE Russell Index Governance Board. The decision of the FTSE Russell Index Governance Board is final and the complainant will be notified of the outcome following its meeting.

Section 4

Further information

4. Further information

For further information on FTSE Russell Indexes please visit www.lseg.com/en/ftse-russell/ or e-mail info@ftserussell.com. Contact details can also be found on the website.

Disclaimer

© 2024 London Stock Exchange Group plc and its applicable group undertakings ("LSEG"). LSEG includes (1) FTSE International Limited ("FTSE"), (2) Frank Russell Company ("Russell"), (3) FTSE Global Debt Capital Markets Inc. and FTSE Global Debt Capital Markets Limited (together, "FTSE Canada"), (4) FTSE Fixed Income Europe Limited ("FTSE FI Europe"), (5) FTSE Fixed Income LLC ("FTSE FI"), (6) FTSE (Beijing) Consulting Limited ("WOFE"), (7) Refinitiv Benchmark Services (UK) Limited ("RBSL"), (8) Refinitiv Limited ("RL") and (9) Beyond Ratings S.A.S. ("BR"). All rights reserved.

FTSE International Limited is authorised and regulated by the Financial Conduct Authority as a benchmark administrator. Refinitiv Benchmark Services (UK) Limited is authorised and regulated by the Financial Conduct Authority as a benchmark administrator.

FTSE Russell® is a trading name of FTSE, Russell, FTSE Canada, FTSE FI, FTSE FI Europe, WOFE, RBSL, RL and BR. "FTSE®", "Russell®", "FTSE Russell®", "FTSE4Good®", "ICB®", "WMR™", "FR™", "Beyond Ratings®" and all other trademarks and service marks used herein (whether registered or unregistered) are trade marks and/or service marks owned or licensed by the applicable member of LSEG or their respective licensors and are owned, or used under licence, by FTSE, Russell, FTSE Canada, FTSE FI, FTSE FI Europe, WOFE, RBSL, RL or BR.

All information is provided for information purposes only. All information and data contained in this publication is obtained by LSEG, from sources believed by it to be accurate and reliable. Because of the possibility of human and mechanical inaccuracy as well as other factors, however, such information and data is provided "as is" without warranty of any kind. No member of LSEG nor their respective directors, officers, employees, partners or licensors make any claim, prediction, warranty or representation whatsoever, expressly or impliedly, either as to the accuracy, timeliness, completeness, merchantability of any information or LSEG Products, or of results to be obtained from the use of LSEG products, including but not limited to indices, rates, data and analytics, or the fitness or suitability of the LSEG products for any particular purpose to which they might be put. The user of the information assumes the entire risk of any use it may make or permit to be made of the information.

No responsibility or liability can be accepted by any member of LSEG nor their respective directors, officers, employees, partners or licensors for (a) any loss or damage in whole or in part caused by, resulting from, or relating to any inaccuracy (negligent or otherwise) or other circumstance involved in procuring, collecting, compiling, interpreting, analysing, editing, transcribing, transmitting, communicating or delivering any such information or data or from use of this document or links to this document or (b) any direct, indirect, special, consequential or incidental damages whatsoever, even if any member of LSEG is advised in advance of the possibility of such damages, resulting from the use of, or inability to use, such information.

No member of LSEG nor their respective directors, officers, employees, partners or licensors provide investment advice and nothing in this document should be taken as constituting financial or investment advice. No member of LSEG nor their respective directors, officers, employees, partners, or licensors make any representation regarding the advisability of investing in any asset or whether such investment creates any legal or compliance risks for the investor. A decision to invest in any such asset should not be made in reliance on any information herein. Indices and rates cannot be invested in directly. Inclusion of an asset in an index or rate is not a recommendation to buy, sell or hold that asset nor confirmation that any particular investor may lawfully buy, sell or hold the asset or an index or rate containing the asset. The general information contained in this publication should not be acted upon without obtaining specific legal, tax, and investment advice from a licensed professional.

