



# Complaints procedure

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## 1 Definition of complaints

Complaints, according to this document, refers to any written correspondence received from a client or other stakeholder, about any stage of the benchmark provision (incl. determination and dissemination) process conducted by SIX, covering areas such as:

- treatment of a corporate action;
- calculation errors;
- disputed free float or shares in issue/calculation figures;
- incorrect index review data;
- interpretation or application of the methodology;
- tax treatment including withholding taxes;
- significant delay of the publication of data; or
- any other complaint about the integrity of a benchmark.

In order for SIX to consider the correspondence as a complaint under this document, the complainant must fully substantiate their complaint with evidence and sufficient detail to enable a comprehensive investigation by SIX. Where there is insufficient detail to pursue the investigation the complainant will be notified as such. Concerns relating to technical problems, for example with the access to data, are not treated as complaints under this working instruction.



## 2 Dealing with customer complaints

### 2.1 Submission of complaints

A complaint can be submitted to SIX by post or by electronic e-mail to one of the following channels:

SIX

SIX Indices

P.O. Box 1758

CH-8021 Zurich

[www.six-group.com/indices](http://www.six-group.com/indices)

[index-complaints@six-group.com](mailto:index-complaints@six-group.com)

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;
- A detailed description of the incident that led to the complaint and of the implications of the incident on the complainant (including all relevant background information);
- The benchmark to which the complaint refers; and
- The date of the complaint.

A complainant may use the form provided in section **Error! Reference source not found.** to submit a complaint. Complainants will receive a confirmation upon receipt of the complaint by SIX within 5 business days which will include the expected date of a response.

### 2.2 Handling of complaints

The general rule is that a complaint must be investigated on a timely and fair basis by the SIX personnel who are independent of any personnel who may be or may have been involved in the subject of the complaint in line with SIX' own complaints procedure. The departments, units and personnel that are the subject of the complaint must be consulted and involved in the investigation process. Complaints that may result in financial or reputational impact to SIX must be escalated to Management Committee.

- SIX Group Legal and Compliance is involved in/informed about the handling of complaints and all organizational units affected are to be consulted.
- Index Operations will draw up an answer and submit it to Index Management for approval or further escalation depending on severity.
- All complaints will be answered in writing within 20 business days if reasonably possible.
- Escalations and appeals against a complaints decision can be escalated to the Management Committee

### 2.3 Documentation and reporting

Documentation of complaints and their resolutions must be made in writing by SIX.

The report and all further documents relating to a complaint, including those submitted by the complainant as well as SIX' own records, must be retained for a minimum of 5 years.

If a complaint results in changes of the benchmark methodology, such a change should be published or made available to clients and other stakeholders as soon as possible as set out in the document Index Transition.



### 3 **Complaints Form / required information**

Complaint Client name

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Date of the complaint

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Details

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Benchmark or services

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Enclosure

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