



Scientific Infra Pte. Ltd.

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Complaint Handling Policy

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1. Purpose and scope

This document sets out Scientific Infra Pte. Ltd. (“Company”) procedures and mechanisms for receiving, investigating and retaining records concerning complaints about its indexes.

The Company is committed to providing a high-quality service to all benchmark users and stakeholders and will handle any complaints promptly, diligently, and impartially in accordance with this Policy.

Benchmark users and stakeholders may from time to time contact the Company or its personnel to,

- (i) seek clarification about a benchmark determination;
- (ii) obtain a better understanding of a particular benchmark methodology;
- (iii) challenge a particular benchmark determination; or
- (iv) on other matters in relation to benchmark determination.

However, the Company does not consider such interactions to be formal complaints and as such the Company maintains separate policies and processes for index restatements and corrections. Hence these will be resolved by the Company in accordance with those policies.

Stakeholders who wish to make a formal complaint shall do so in accordance with this Complaints Handling Policy.

2. Formal Complaint Process & Procedure

In order for a complaint to enter the formal complaints handling process, the complainant must record the complaint in writing, expressly stating that they wish the complaint to be handled as a formal complaint and attaching all relevant materials or evidence where appropriate.

1. The formal complaint must include the following,
 - The Complainant’s full name, contact details and (if applicable) company name, title and function;
 - The name of the index or indexes affected by the issue raised and the date or period issue was observed;
 - A detailed description of the issue and the impact that has been observed.

The formal complaint should be sent by email to complaint@edhecinfra.com. Complaints received through other channels such as phone calls will not be qualified as formal complaints.

2. Upon receipt of a formal complaint, the Client Services team will undertake the following steps:
 - Acknowledge receipt of the formal complaint in writing 3 business days upon receipt of the formal complaint;
 - Document the receipt of the formal complaint in the Complaint Register;
 - Investigate the formal complaint in a timely and fair manner.
(i.e. within 45 calendar days after acknowledgement of complaint, unless circumstances warrant a longer time period – in which case the complainant will be informed) Where appropriate the investigation will be conducted independently of any personnel who may be or may have been involved in the subject matter of the investigation;
 - The Risk & Compliance Team will then determine whether further escalation to the relevant committees or the Company’s Board. Where no escalation is deemed necessary, the complainant will be notified of the outcome of the investigation.
 - If the Risk & Compliance Team determines that escalation is required, the complaint will be referred to and discussed with the relevant committees such as the Index Review Committee (“IRC”), Index Research and Offering Committee (“IROC”), the Index Oversight Committee (“IOSC”) or the Company’s Board. The complainant will be advised of this escalation;

- The complainant will then be advised, in writing, of the final outcome of the investigation.
- The Company's Complaint Register will also be updated.

3. Remedies

Where a complaint is upheld, The Company will accept responsibility, explain what went wrong and why, and implement the remedial changes required. Any remedy selected will be proportionate and appropriate to the shortcoming identified.

- If, as a result of the investigation, a change in index determination is warranted, the change will be implemented (per the Index Methodology Change and Consultation Policy) before notifying the complainant.
- If, as a result of the investigation, a change in the index methodology is warranted, the Company reserves the right to take any action deemed appropriate including not restating the index.

Where appropriate, any remedies applied to be communicated to all stakeholders, relevant committees within the Company and staff.

4. Audit Trail

The Company will record and document all formal complaints as an audit trail, and this shall be made available to various committees, audit and regulatory reviews and staff.

On an at least annual basis, the Client Service/ Risks & Compliance Team will review all formal complaints to determine the existence of any trends.

5. Record Retention

All documents relating to a formal complaint, including those submitted by the complainant, will be retained for at least five years or in accordance with applicable legal and regulatory requirements.