

# Complaints Policy

## MV Index Solutions GmbH (“MVIS”)

10 December 2020

### 1. Introduction

The main purpose of the complaints process is to ensure that:

- Complaints are dealt with promptly and resolved as quickly as possible.
- Review of the complaints is fair and respectful to all parties involved.
- Complainants are given specific and understandable explanations for decision directly relating to the complaints.
- Complaints are taken into consideration and used as a foundation for constant improvement of our services and annual review of complaints policy and procedures.

This Policy is based on the “European Benchmark Regulation”, in particular Principle 9 “Mechanism for the treatment of complaints”. It applies to all complaints regarding calculation, selection, universe, methodology changes and other decisions regarding the determination of the index value.

### 2. Procedure

#### a. Receiving complaints

Complaints must be handed in earlier than one week after the announcement or implementation of an index change. Other complaints not related to an index change must be handed in as close as possible to the related event of subject matter.

- All complaints must be forwarded to senior management for informational purposes and to ensure handling goes smoothly.
- MVIS will ensure that the analysts who were associated with the subject matter of the complaint are excluded from the processing of the complaint.
- MVIS will ensure that the review of the complaints is fair and respectful to all parties involved.

An official complaint may either be handed in by mail to:

MV Index Solutions GmbH  
Attn. Index Compliance  
Kreuznacher Str. 30  
60486 Frankfurt/Main

or by e-mail to [info@mvis-indices.com](mailto:info@mvis-indices.com).

This information can also be found on the MVIS website, [www.mvis-indices.com](http://www.mvis-indices.com).

The receipt of a complaint will be immediately confirmed to the complainant.

All complaints will be entered into the complaints schedule with complaint number, date, subject, content and status.

## b. Investigation and Measures

Investigations related to complaints will be handled by Index Compliance and Senior Management.

- The investigation will be based on the relevant index guide and justified in a way which considers all the complainants arguments.
- The results of an investigation may lead to a respective change in the index methodology or index composition. MVIS's senior management and compliance will decide whether changes need to be implemented immediately or with the next review.

## c. Communication of Results

- The result of the investigation and the communication of the result will be entered into the Complaints Schedule.
- Results of investigation will be communicated to the complainant within a week - unless this conflicts with the objectives of the Public Order or Regulation (EU) Nr.596/2014
- Communication of results will be made in the same way as the complaint was conveyed.

## 3. Updating Procedures

No process stays the same and change is inevitable, therefore it is important that this procedure be reviewed on an annual base and updated when appropriate.