



Complaints Handling at SIX Financial Information Nordic AB





Document History

Revision	Date	Changes
1.0	28.09.2020	Initial version
1.1	22.09.2021	Updated 2.1 Submission of Complaints with new link

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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 Nordic, 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;
- Proposed change to the benchmark determination process;
- Significant delay of the publication of data; or
- Any other complaint about the integrity of a benchmark.

In order for SIX Nordic 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 document.

2. Dealing With Customer Complaints and Errors

2.1 Submission of Complaints

A complaint can be submitted via the **Email Complaints Form** [here](#) or to SIX by post to the following address:

SIX Financial Information Nordic AB
SIX Index Box 3117
SE-103 62 Stockholm

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 lead 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 4 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 the Local Leadership Team Nordic (LLT Nordic).

- SIX 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 LLT Nordic.



2.3 Documentation and Reporting

Documentation of complaints and their resolutions must be made in writing by SIX. Decisions on the complaint are to be issued by way of circular resolution.

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 in line with the methodology rules of SIX.

3. Form

Complaint Client name

Date of the complaint

Details

Benchmark or services

Enclosure
