

# SOLACTIVE | COMPLAINTS PROCEDURE POLICY

Version 2.0

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## 1. INTRODUCTION

This document describes Solactive AG's policy in place for index complaints made by stakeholders with regard to indices owned and administered by Solactive AG.

## 2. SCOPE

In order to increase efficiency and response time, Solactive AG asks to use the present complaints procedure when making a complaint, regarding - but not limited to - any of the following:

- complaints regarding the accuracy of index calculation;
- complaints regarding whether a specific index determination is representative of the underlying Interest it seeks to measure;
- complaints regarding the application of the Methodology in relation to a specific index determination;
- complaints regarding the index composition;
- complaints regarding index changes in the course of an ordinary or extraordinary index rebalancing;
- complaints regarding any other decisions in relation to a index determination;
- complaints regarding tax treatment including withholding taxes;
- complaints regarding licensing issues, including all claims made by any legal entities that their intellectual property has been violated by Solactive AG.

Please note that questions regarding ongoing or future business relationships and other queries which cannot be regarded as complaints within the meaning of this policy should still be addressed to the usual mailing list or contact persons within Solactive AG.



### 3. SUBMISSION OF THE COMPLAINT

Solactive has created an e-mail address ([complaints@solactive.com](mailto:complaints@solactive.com)) that should be used by anyone willing to make a complaint.

It is also possible to submit the complaint by postal mail to Solactive AG, Guiollettstr. 54, 60325 Frankfurt am Main, Germany.

The complaint should include:

- complainant's contact details, including full name, address, telephone number and email address;
- company name (where applicable);
- detailed description of the concern;
- the name of the index in question; and
- the date of the incident and of the complaint.

If all above mentioned information are not provided, Solactive may possibly not be able to process the complaint in every respect. Solactive may request more details if anything should be unclear.

Furthermore, if any employee of Solactive notices any event or incident that could be a complaint, he may forward this and any relevant correspondence to the COO or the Management Board. In addition, the employee may also write down a summary of any verbal communication with the stakeholder and forward it. However, Solactive AG reserves the right to refer the respective stakeholder to the written complaints procedure as stated above.

### 4. PROCEDURE

Overall responsibility for the implementation of this policy lies with the COO of Solactive AG, who is the Compliance Officer of the firm. In the case that the COO is absent, Solactive AG's CEO is responsible for the present complaints procedure.

Once a complaint is submitted, the respective investigation manager will consider the complaint and forward it to the respective department of Solactive AG where appropriate and necessary. In this respect, it may be escalated to the next level of management, the legal department or the CEO of Solactive AG depending on the subject matter of the complaint.

Solactive AG will ensure that any personnel who may be involved in the subject matter of the complaint is excluded from the decision-making process.

Solactive AG will seek to investigate all complaints in a timely and fair manner. Furthermore, it will aim to complete its investigation promptly. Where possible, Solactive AG will seek to adhere with the following timetable:

- Complaints will be acknowledged in writing within 3 business days of receipt.
- The stakeholder will receive a written response regarding the result of the investigation within 40 business days of receipt. If this is not possible, an interim response will be sent to the complainant within 40 business days and the complainant may be advised in writing of the reasons for the delay.



Complaints that may have financial or reputational consequences may be subject to review and approval by Solactive AG's Oversight Committee or Management Board.

## **5. RESULTING CHANGES**

In the event that the complaint is considered as valid, Solactive will make all necessary adjustments to its treatment and processes, and all changes will be publicly announced on [www.solactive.com/category/announcements/](http://www.solactive.com/category/announcements/) before they are implemented. However, with regard to this Solactive reserves the right to take any measures which it considers to be appropriate, among others, also not to restate the respective index.

## **6. CONFIDENTIALITY AND RECORD KEEPING**

All information contained in the complaint will be handled sensitively, and any relevant data protection requirements will be followed. Solactive AG will only disclose identifiable information if it is necessary, and, when it is necessary, only disclose the minimum amount necessary.

Solactive AG will keep records of all correspondence and documents relating to any complaint regardless of whether submitted by the complainant or Solactive AG for at least five years.

## **7. ACCOUNTABILITY**

This policy will be reviewed regularly and updated accordingly.



## **CONTACT DETAILS**

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## **SOLACTIVE AG**

Solactive AG is an innovative index provider that focuses on tailor-made indices, which it develops, calculates and distributes worldwide. As of 31st December 2014, Solactive AG calculates indices over all asset classes for 175 clients in Europe, America and Asia, with approximately USD 25 billion invested in products linked to indices calculated by the Company globally, primarily via 170 Exchange Traded Funds from a number of well-known providers. Solactive AG was established in 2007 and is headquartered in Frankfurt.

[www.solactive.com](http://www.solactive.com)

