

COMPLAINTS PROCEDURE POLICY

Public

Version 1.1

31 August 2025



TABLE OF CONTENTS

1 Purpose..... 3

2 Scope..... 3

3 Definition of Complaint 3

4 Submission of the Complaint 4

5 Procedures..... 5

 5.1 General..... 5

 5.2 Receipt..... 5

 5.3 Further Processing..... 5

 5.4 Communication with the Complainant..... 5

6 Confidentiality and Record Keeping 6

7 Definitions 7

Contact..... 8



1 PURPOSE

This document describes SOLACTIVE procedures in place for receiving, investigating and retaining records concerning COMPLAINTS made with respect to INDICES and SERVICES provided by SOLACTIVE

In order to increase efficiency and response time, as well as to foster the improvement of the INDEX provision SERVICES, SOLACTIVE has established the following complaints procedure.

2 SCOPE

Although SOLACTIVE strives to provide the INDICES and SERVICES to the fullest satisfaction of its clients, market participants and investors in financial instruments that have the INDICES as reference objects, and in a manner that does not give rise to COMPLAINTS, SOLACTIVE is aware and acknowledges that it cannot be excluded that the actions of SOLACTIVE may adversely affect its clients and other parties and that this could give rise to formal or informal COMPLAINTS.

COMPLAINTS may be submitted to SOLACTIVE regarding - but not limited to - any of the following:

- the accuracy or timeliness of INDEX calculation;
- whether the INDEX appropriately represents the market, segment or strategy it seeks to measure;
- any proposed or implemented changes to the INDEX determination process;
- the application or interpretation of the INDEX methodology in relation to a specific determination;
- other decisions in relation to the INDEX determination process;
- the INDEX composition;
- any INDEX changes in the course of an ordinary or extraordinary INDEX rebalancing;
- the treatment of corporate actions, including the application of withholding tax rates or other tax-related adjustments;
- the creation, calculation, or dissemination of iOPVs, iNAVs, or PCFs;
- any delays, interruptions, or inaccuracies in the publications of INDEX levels or data;
- any licensing issues, including all claims made by any legal entities that their intellectual property has been violated by SOLACTIVE; and
- any other issues related to the SERVICES provided by SOLACTIVE.

3 DEFINITION OF COMPLAINT

SOLACTIVE considers a COMPLAINT to be an expression of dissatisfaction or a report from a client or other party about a problem with an INDEX or a SERVICE that expressly or implicitly includes the request for a statement or the rectification of the reason for the COMPLAINT ('**COMPLAINT**').



4 SUBMISSION OF THE COMPLAINT

COMPLAINTS can be submitted via email to complaints@solactive.com or by postal mail to

Solactive AG
Platz der Einheit 1
60327 Frankfurt am Main
Germany

Questions regarding ongoing or future business relationships and other queries that cannot be regarded as COMPLAINTS within the meaning of this policy should be sent to a general contact email address info@solactive.com or addressed to contact persons within SOLACTIVE.

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 COMPLAINT;
- designation of the INDEX if the COMPLAINT relates to an INDEX;
- designation of the SERVICE (where applicable); and
- the date and time of the event that triggered the COMPLAINT.

If any of the above-mentioned information is not provided, SOLACTIVE may not be able to process the COMPLAINT in every respect. SOLACTIVE may request more details if deemed necessary.

If a verbal or written communication between an EMPLOYEE and a client or other third party gives rise to the assumption that this is a COMPLAINT, the respective EMPLOYEE will report this case to COMPLIANCE. Such a report must contain all relevant information (emails, meeting notes, etc.) that gave rise to the assumption of a COMPLAINT. However, SOLACTIVE reserves the right to refer the respective client or third party to the procedure for submitting a COMPLAINT, as stated above.



5 PROCEDURES

5.1 GENERAL

Overall responsibility for receiving, investigating and managing COMPLAINTS is with COMPLIANCE.

5.2 RECEIPT

Once a COMPLAINT is submitted, COMPLIANCE will:

- classify the COMPLAINT for action;
- prioritize the COMPLAINTS; and
- determine the EMPLOYEE responsible for the further processing of the COMPLAINT, including the investigation of the facts of the case.

5.3 FURTHER PROCESSING

SOLACTIVE will ensure that any person who may be directly involved in the subject matter of the COMPLAINT is excluded from the further processing of the COMPLAINT, including the investigation of the facts of the case, and the decision-making process.

The EMPLOYEE responsible for processing the COMPLAINT will check that the COMPLAINT is sufficiently detailed and complete. If it is determined that the COMPLAINT is not accompanied by information deemed to be material for further processing or the information provided needs clarification, further details or information will be requested from the complainant. SOLACTIVE will seek to investigate all COMPLAINTS in a timely and fair manner. Factors, such as - but not limited to - classification of priority of the COMPLAINT, complexity of the matter and availability of staff will affect the processing time.

COMPLIANCE will review the results of the investigation and determine the validity of the COMPLAINT as well as determine any measures to resolve the COMPLAINT. Such determination will consider both the interests of the complainant and those of other relevant persons and will set out measures to remedy the situation that gave rise to the COMPLAINT.

The review should include an identification of the underlying issues that have led to the COMPLAINT and recommendations to the relevant business teams for actions to prevent further occurrence.

With respect to COMPLAINTS that have material financial or reputational consequences, COMPLIANCE will seek the decision of the MANAGEMENT BOARD on the COMPLAINT.

5.4 COMMUNICATION WITH THE COMPLAINANT

COMPLAINTS will be acknowledged in writing by mail or email within 3 business days of receipt, regardless of their priority.



SOLACTIVE will seek to send a written reply to the complainant within 20 business days of receipt. If this is not possible, an interim response will be sent to the complainant within 20 business days.

If the COMPLAINT is not fully remedied, the reply to the complainant shall include a statement of reasons for this circumstance considering SOLACTIVE's position.

6 CONFIDENTIALITY AND RECORD KEEPING

All information contained in the COMPLAINT will be handled in a manner consistent with applicable data protection laws. This refers to maintaining confidentiality of personal information of the complainant. SOLACTIVE will not disclose the identity of the individual complainant, unless required by law or ordered by supervisory authorities. SOLACTIVE may collect information from the complainant to process and investigate the COMPLAINT. This may require sharing information within different departments or teams of SOLACTIVE.

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



7 DEFINITIONS

For the purposes of this document, the defined terms used herein shall have the following meaning:

'COMPLAINT' (or **'COMPLAINTS'**) is defined in [Section 3](#).

'COMPLIANCE' means the legal and compliance department of SOLACTIVE.

'EMPLOYEE' (or **'EMPLOYEES'**) means all staff of SOLACTIVE, including temporary staff and interns, working students, contractors, the members of the MANAGEMENT BOARD or any other person who works for SOLACTIVE, regardless of their duration of employment relationship or contract.

'iNAV' (or **'iNAVs'**) means indicative Net Asset Value.

'INDEX' (or **'INDICES'**) refers to any financial index, benchmark, or comparable product or service, including but not limited to those used for measuring the performance of financial instruments, investment funds, or strategies.

'iOPV' (or **'iOPVs'**) means Indicative Optimized Portfolio Value.

'MANAGEMENT BOARD' means the management board of SOLACTIVE.

'PCF' (or **'PCFs'**) means Portfolio Composition File.

'SERVICE' (or **'SERVICES'**) means the following services provided by SOLACTIVE to its clients:

- INDEX calculation;
- INDEX administration
- INDEX validation
- INDEX data publication and dissemination;
- calculations of Indicative Optimized Portfolio Value (iOPV) and Indicative Net Asset Value (iNAV);
- creation and dissemination of Portfolio Composition Files (PCF); and
- other services or solutions offered and provided to SOLACTIVE clients.

'SOLACTIVE' means SOLACTIVE AG and its subsidiaries.

CONTACT

Solactive AG

German Index Engineering

Platz der Einheit 1

60327 Frankfurt am Main

Germany

Tel.: +49 (0) 69 719 160 00

Fax: +49 (0) 69 719 160 25

Email: info@solactive.com

Website: www.solactive.com

© Solactive AG