

Complaints Policy

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Policy Objective

CoinDesk Indices, Inc. (“**CDI**”) administers and publishes various reference rates and indices (“**Benchmarks**”) that are used by its clients and market participants. CDI publishes methodology and policy documents to provide transparency into its Benchmark determination process. CDI regularly engages with clients and market participants through a variety of channels, which may include queries concerning methodology rules and Benchmark results. However, in the event any party has a formal complaint regarding a CDI Benchmark, this policy provides the procedures CDI will follow to handle its investigation and response.

Users may submit a complaint concerning any aspect of CDI’s Benchmark administration. However, as a general guideline, formal complaints relate to one of the following:

- Correct application or interpretation of a Benchmark Methodology
- Whether a Benchmark no longer meets its intended objective
- Material disruptions to the publication of a Benchmark
- Proposed or actual change to, or other decision affecting, the Benchmark determination process

Complaint Procedure

Submission

Complaints must be submitted to IndexServices@coindesk-indices.com and must include the following information for CDI to perform its review:

- Name of the complainant and contact details
- Index name(s)

- Detailed description of the complaint and its impact, including relevant date(s).

Process

Once received, a complaint will be handled according to the following procedures:

1. If the necessary information has not been provided, CDI will request additional information from the party that issued the complaint.
2. Once the issue is appropriately understood, the complaint will be assigned to an appropriate internal party that is independent of those involved in the subject of the complaint to investigate the complaint and determine an appropriate response.
3. Complaints and proposed responses, including any remediation actions (e.g., restatement), will be reviewed by CDI's Legal and Compliance function. The time it takes to complete the investigation and review will depend on the nature of the complaint. Any information provided by the complainant may be used by CDI and shared internally with all necessary parties to complete its investigation and/or support legal or regulatory proceedings.
4. Once completed, CDI will provide a written response to the complaint within a reasonable amount of time.
5. In the event CDI will correct or modify a benchmark, CDI will follow its standard procedures to announce and implement any changes as outlined in the CoinDesk Digital Asset Indices Policy Methodology.

Record Retention

CDI will retain a record of the complaint as well as information and data related to the complaint based on its record retention policy.

Disclaimer

CoinDesk Indices, Inc. ("CDI") administers various reference rates and indices ("Indices") for use by financial institutions and other users. CDI does not guarantee the timeliness, accuracy or completeness of any data or information relating to the Indices. CDI makes no warranty, express or implied, as to the Indices or any data or values relating thereto or results to be obtained therefrom, and expressly disclaims all warranties of merchantability and fitness for a particular purpose with respect thereto. It is not possible to invest directly in an Index. Back-tested performance is not actual performance. Past performance is not an indication of future results. To the maximum extent allowed by law, CDI, its licensors, and its and their respective employees, contractors, agents, suppliers and vendors shall have no liability or responsibility whatsoever for any injury or damages - whether direct, indirect, consequential, incidental, punitive or otherwise - arising in connection with the Indices or any data or values relating thereto - whether arising from their negligence or otherwise. This document constitutes the provision of factual information, rather than financial product advice. Nothing in the Indices shall constitute or be construed as an offering of financial instruments or as investment advice or investment recommendations (i.e., recommendations as to whether or not to "buy", "sell", "hold", or to enter or not to enter into any other transaction involving any specific interest or interests) by CDI or a recommendation as to an investment or other strategy by CDI. Data and other information available via the Indices should not be considered as information sufficient upon which to base an investment decision. All information provided by the Indices is impersonal and not tailored to the needs of any person, entity or group of persons. CDI does not express an opinion on the future or expected value of any asset or other interest and do not explicitly or implicitly recommend or suggest an investment strategy of any kind. Customers should consider obtaining independent advice before making any financial decisions. All names, logos, and other trademarks used to identify CDI's indices are owned by CDI and shall not be used in any manner without the prior written permission of CDI. This document and its contents may not be forwarded or redistributed without the prior consent of CDI. © 2022 CoinDesk Indices, Inc. All rights reserved.