

## **MarketGrader Policy for Handling Index Complaints**

MarketGrader is committed to safeguarding the integrity of its indexes and to ensuring they represent their stated objective as outlined in our index rulebooks and methodology documents. As MarketGrader's indexes are typically selected based on our individual company ratings, they do not aim to represent traditional market segments but rather a collection of companies that meet our selection criteria within a passive, rules-based, transparent selection, maintenance and rebalance process.

The ability for stakeholders in our indexes to provide us with input about their quality and their faithful adherence to their stated methodologies is an integral part of our index management process. This includes their ability to file complaints easily and to expect that a clear process to address such complaints and respond to them in a timely manner be in place. The following is a list of index complaints about which index stakeholders may communicate directly with MarketGrader according to the policy contained in this document:

- Whether the index represents the methodology stated in its rulebook and the specific strategy it seeks to follow.
- Whether the index's rules are being faithfully observed in its management and publication.
- Whether any material changes to the index are explained clearly and in advance of their implementation.
- Whether the index determination process is transparent, replicable and reliable.

### How to File a Formal Complaint

Stakeholders may file formal index complaints by writing to [indexcomplaints@marketgrader.com](mailto:indexcomplaints@marketgrader.com). All complaints must include the full name of the complainant, the company name (if applicable) and a description of the nature of the complaint and its perceived impact.

MarketGrader will investigate all complaints promptly. If any complaint requires a material change to the selection, publication or maintenance of an index, such change will be communicated to all stakeholders in advance of its implementation. Regardless of the outcome of an investigation following the filing of a complaint, MarketGrader will notify the complainant, in writing, of the outcome within fourteen (14) days.

All records pertaining to complaints filed as prescribed herein will be kept for minimum period of five years.