



Complaints Handling Procedure

CC Data Limited

Last Review Date: 13 May 2025

Dealing with Complaints

CC Data Limited and CoinDesk Indices, Inc (“CCData”) takes all feedback on its products and policies seriously and strives to resolve them satisfactorily and as quickly as possible. All queries and complaints relating to any service or product issue are recorded and managed via the CCData Compliance team, who can be contacted at benchmarks@ccdata.io

This document sets out the procedure CCData shall follow in the event a complaint is received. Complaints may be received for the following reasons:

- whether a benchmark determination is representative of market value
- complaints concerning a change to or misapplication of CCData’s benchmark determination process
- concerning the methodology and changes or misapplication of it
- or any other reason relating to CCData’s benchmark administration activities

In the event that a customer wishes to make a complaint, this can be made via email. In the first instance, the complaint should be handled by a service representative, in consultation with the Compliance Department, and resolution of the complaint sought.

If the complaint is capable of being resolved the same business day as it is received, any agreed course of action should be taken and a file note made and inserted on the customer’s file, together with any copy correspondence.

All complaints shall be handled in accordance with the following principles:

- Investigations must be handled in a fair and timely manner;
- Investigations must be conducted by independent individuals who are not the subject of the complaint or involved in the determination of benchmarks
- Resolution of the complaint must be communicated to the complainant
- All records and correspondence relating to any complaints, queries or issues must be maintained for at least 5 years.

In the event that a complaint is not capable of resolution the same business day as it is received, a brief written explanation of the substance of the complaint should be taken and logged on the CRM system and stored together with any written correspondence from the customer concerned. At this point in time, an entry should be made in the Complaints Register and the date of receipt of the complaint recorded in the Complaints Log.

If the complaint has not been resolved by the close of business on the second day, the account manager concerned is responsible for ensuring that a copy of these procedures are sent to the customer and receipt of the complaint acknowledged in writing within 5 business days. The name and job title of the person handling the complaint must be advised to the customer.

In order to ensure that complaints are fairly, consistently and promptly dealt with, the Compliance Dept. must be consulted and sign off on any proposed course of action or correspondence. The Compliance Dept. will be responsible for ensuring that any complaint is properly investigated and that reasonable timeframes are adhered to.

Once the final resolution has been determined, if a recalculation or reissue of data is required, a client notice will be issued to all affected users detailing the decision. In the event that the complainant disagrees with such decision or considers there are grounds for appeal, the issue will be escalated to the Oversight Function whose decision is final.

In the event that a complaint identifies a systemic, recurring or specific problem, the Compliance Dept. will advise the Oversight Function, who shall be responsible for notifying the CEO of the problem and seek to resolve it via discussion and the implementation of any conclusions arrived at.

Within 15 business days of receiving the complaint, or 35 business days in extenuating circumstances, a final response must be issued to the complainant.

A record of the complaint must be retained by the company for 5 years from the date of the receipt of the complaint.

A complaint will be deemed to be closed when the company has sent a final response or the customer has indicated, in writing, acceptance of the company's earlier response.

All staff dealing with customers are required to read and understand these complaints procedures.

| Date | Update |
|------------|--------------------------------|
| 20-08-2020 | Initial version |
| 17-08-2022 | Review, no changes |
| 25-01-2024 | Review, brand change |
| 11-09-2024 | Review, no changes |
| 13-05-2025 | Review, added CoinDesk Indices |