



ARGUS BENCHMARK ADMINISTRATION BV (ABA) COMPLAINTS HANDLING POLICY

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The most up-to-date Argus Benchmark Administration BV (ABA) Complaints Handling Policy is available on www.argusbenchmarkadministration.nl

Introduction

Argus Benchmark Administration BV (“ABA”) is part of the Argus Media group of companies, an independent news and price reporting agency. ABA is the administrator of certain benchmarks (the “Benchmarks”) for the purposes of the European Benchmark Regulation (the “BMR”).

Procedure for submission of complaints

Subscribers of Argus Media prices that are used as benchmarks under the BMR and administered by ABA may submit complaints against ABA and ABA personnel on:

- whether a specific benchmark calculation is representative of market value;
- proposed benchmark calculation changes;
- applications of methodology in relation to a specific benchmark calculation; and
- other editorial decisions in relation to the benchmark calculation processes.

For a complaint to be designated as a formal complaint and enter the proper handling process:

1. the complaint must relate to the above matters, ie the complaint must relate to an in-scope benchmark and the administrator’s calculation process in relation to such benchmark, and
2. the complainant must record it in writing, expressly stating that they wish the complaint to be handled as a formal complaint.

The complainant must also explain in writing, as fully as possible, the background to the formal complaint and attach all relevant materials or evidence where appropriate, and send it to abacompliance@argusmedia.com.

The complaint can also be addressed to the Global Compliance Officer at Argus Media, Lacon House, 84 Theobald’s Road, London, WC1X 8NL, UK, who will send it to the relevant personnel at ABA.

Procedure for investigation of complaints and timetable

On receipt of the formal complaint, ABA will:

- Acknowledge receipt of the formal complaint.
- Investigate the formal complaint within eight weeks (unless circumstances require a longer time period, in which case the complainant will be informed) and in a fair manner including, where appropriate, ensuring that the investigation is conducted independently of any personnel who may be involved in the matter being investigated.
- ABA will formally notify the complainant of the outcome of the investigation in writing.

ABA will aim to complete its investigation promptly by conducting the process within the allowed timescale. The complainant will be kept informed of the timetable.

If a complainant is dissatisfied with the way a complaint has been handled or with its decision, the complainant shall be entitled to request in writing, within six months of making the original formal complaint, to refer the matter to a suitably qualified third party appointed by ABA. The cost of the appeal shall be borne by ABA if the complaint is upheld and borne by the complainant if it is not upheld.

Retention of records

All documents relating to a formal complaint, including those submitted by the complainant, as well as ABA’s own records, will be retained by ABA for a minimum of seven (7) years.