



ICE DATA INDICES, LLC

COMPLAINTS POLICY

April 2025



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1. OVERVIEW

- 1.1. ICE Data Indices, LLC (“IDI”, the “Administrator”, “we” or “us”) has developed this Complaints Policy (the “Policy”)¹ to set out the process by which Stakeholders may submit a complaint and the procedures for investigating an Eligible Complaint (as defined below).
- 1.2. Terms used but not defined in this document have the meanings given to them in the IOSCO Principles or applicable IDI or ICE policy.

2. MAKING COMPLAINTS AND COMPLAINT FORWARDING

- 2.1. A complaint must be submitted by email and must include “Complaint - ICE Data Indices” in the subject line. The email address to submit complaints is compliance-icedataindices@ice.com
- 2.2. Alternatively, if a Complainant (as defined below) wishes to write directly to the IDI Governance Committee, please follow the instruction in 2.1 above and include at the beginning of the email body “FAO: ICE Data Indices Governance Committee”.
- 2.3. If a complaint is not in writing, we will ask for the details to be submitted by email. IDI is not obliged to investigate any complaint unless and until it has been submitted by email in accordance with this Policy.
- 2.4. To help us to review the complaint and to determine if it is an Eligible Complaint as defined under this Policy, we ask you to supply as much evidence as you can; to be clear about the nature of the complaint (including when you first became aware of the issue giving rise to the complaint and, if the complaint relates to an issue that occurred more than once, how often it has occurred), and how you have been affected.
- 2.5. The complaint must be signed on behalf of the Complainant, and in any case where it is made by a company, partnership or other type of legal entity, it must be signed by a person duly authorized to sign on behalf of the Complainant.
- 2.6. We will inform you promptly if we think that your complaint should be handled by another ICE entity, providing you with the contact details of the other entity before forwarding it to them.

3. ELIGIBLE COMPLAINTS

- 3.1. Upon receipt of a complaint submitted in accordance with this Policy, we will reply via email within five (5) business days to acknowledge receipt of the complaint and provide a copy of this Policy.
- 3.2. Where it is determined that a submitted complaint is not an Eligible Complaint, we will provide you with an explanation and inform you that it will be handled instead in line with IDI’s general customer support procedures.

¹ This policy addresses [the IOSCO Principles for Financial Benchmarks](#) and the [European Union \(EU\) and United Kingdom \(UK\) Benchmarks Regulation \(BMR\)](#), each as they relate to Complaints handling procedures.



3.3. An “Eligible Complaint” for the purposes of this Policy is defined as any complaint received in accordance with this Policy from any person, which may include individual consumers, federal, state or foreign regulatory or enforcement bodies, or legal entities (the “Complainant”), which expresses dissatisfaction about the provision of, or failure to provide, the Benchmark administration service and may, for example, concern:

- whether a specific Benchmark determination is representative of the underlying Interest it seeks to measure;
- whether it is alleged that a Benchmark or a family of Benchmarks have been manipulated;
- a proposed change to the Benchmark determination process;
- applications of the Methodology in relation to a specific Benchmark determination(s);
- other Administrator decisions in relation to a Benchmark determination; and
- is not one of the matters excluded as set out immediately below.

3.4. A complaint received will not be treated as an Eligible Complaint if it relates to:

- matters that have already been fully investigated through this Policy, unless new evidence is available;
- informal disputes about matters relating to the Benchmark determination; for example, general questions about a Benchmark determination are out of scope and will be handled in line with IDI’s general customer support procedures;
- concerns about possible ICE or IDI policy violations by IDI or any of its employees that do not concern the matters listed above, which will be handled in accordance with ICE’s Global Code of Business Conduct², ICE’s Global Reporting and Anti-Fraud Policy or other relevant ICE Policy;
- matters connected with or arising out of a contractual or commercial dispute involving IDI;
- complaints about access to information where procedures and remedies are set out in legislation or regulation, including but not limited to the California Consumer Privacy Act (“CCPA”) and the EU General Data Protection Regulation;
- a matter that occurred more than 12 months ago, unless there are reasonable grounds for delay;
- other cases where, in the opinion of IDI, the complaint is more appropriately handled in line with IDI’s general customer support procedures.

3.5. Where it is determined that the complaint is an Eligible Complaint as defined under this Policy, we will investigate the Eligible Complaint carefully, diligently and in a fair manner. This will be done by a member of staff who is not or has not been involved in the subject-matter of the Eligible Complaint (the “Investigator”). We will also report, as appropriate, the Eligible Complaint and any information received in the course of the investigation or in connection with the Eligible Complaint to the IDI Governance Committee and/or relevant Regulatory Authorities.

4. INVESTIGATING THE COMPLAINT

4.1. In the Investigator’s assessment of an Eligible Complaint, factors that may be relevant include:

- the particular circumstances of the Eligible Complaint;

² <https://ir.theice.com/governance/governance-overview/default.aspx>



- similarities with other complaints that may have been received by us; and
- guidance published by relevant authorities or organizations, which may include regulators and industry associations.

4.2. During the review of the Eligible Complaint, we may need to get further information from you and/or from others. We may also need to get clarification of the information you have provided to us. If we ask you for further information or validation, please respond to us as soon as possible so that we may continue to resolve the Eligible Complaint quickly. Delays in you responding to us may result in delays in our ability to continue this process and resolve the matter.

5. RESOLVING THE ELIGIBLE COMPLAINT

- 5.1. On completion of the investigation of the Eligible Complaint, we will write to you promptly with the decision, provided such communication is not contrary to objectives of public policy or to applicable law or regulation, for instance applicable market abuse regulation, including the EU Market Abuse Regulation 596/2014, and explain clearly the assessment of the Eligible Complaint, whether any remedial action is proposed and, if so, the form that such remedial action will take. If the Eligible Complaint is rejected, we will advise you of the reasons for doing so.
- 5.2. If we cannot send you a final response within eight (8) weeks of the date when the complaint was confirmed as an Eligible Complaint, we will write to you to explain why and to let you know when we expect to be able to complete the review and give you the final response.
- 5.3. If resolution of an Eligible Complaint leads to a restatement of Benchmark values or a change in a Benchmark determination, we will announce such actions on the primary IDI distribution platform for the applicable Benchmark (ICE Index Platform <https://indices.ice.com/>).

6. CONFLICTS OF INTEREST

- 6.1. To avoid any perception of or actual conflict of interest in the investigation of an Eligible Complaint, we will ensure that the investigation is performed in accordance with this Policy and other IDI and ICE policies addressing conflicts of interest. The outcome will also be reviewed and validated by IDI senior management before a response is provided to you. In addition, the Eligible Complaint, and any conflict of interest that was identified and managed will all be reported to the IDI Governance Committee for its oversight.

7. CONFIDENTIALITY

- 7.1. Subject to applicable laws and regulations, all complaints will be dealt with confidentially. It may, however, be necessary for us to contact third parties for information. We will endeavor to do this without identifying you if this is possible. You may advise us that we are not permitted to identify you as the Complainant, but in such circumstances, it may be challenging for us to complete our review of your complaint.

8. APPEALS

- 8.1. If you are dissatisfied with the response provided, you may request that the matter be escalated to the IDI Governance Committee for review.



9. RECORDING COMPLAINTS

- 9.1. Subject to applicable laws and regulations, all records relating to the handling of a complaint (including all documents submitted by the Complainant, as well as IDI's own record) will be retained for at least 5 years.

10. REVIEW

- 10.1. This Policy is subject to review on a periodic basis, and at least once in a calendar year. The Policy may be subject to more frequent review and revision based on business and/or regulatory changes.

11. AVAILABILITY OF DOCUMENTATION

- 11.1. This Policy shall be published on IDI's website <https://www.ice.com/fixed-income-data-services/index-solutions/regulation>

12. QUERIES

- 12.1. If you have any queries on this Policy, please contact IDI at legal®ulatory-icedataindices@ice.com, or in writing directly to the IDI Compliance Officer using the contact information in Section 2.

13. APPROVAL

- 13.1. This Policy has been approved by the IDI Governance Committee.