

COMPASS FINANCIAL TECHNOLOGIES

Complaints Policy

How to raise a complaint with Compass Financial Technologies

Introduction

Compass Financial Technologies (France) ("Compass") is committed to providing a high-quality benchmark administration service to all users and stakeholders. We take complaints seriously and will handle every complaint promptly, diligently, and impartially.

This Policy has been established in accordance with the requirements of EU Benchmarks Regulation 2016/1011, which requires benchmark administrators to publish a written complaints policy through which stakeholders may submit complaints concerning the representativeness of a benchmark, the application of benchmark methodology, and other administrator decisions in relation to a benchmark determination.

What You Can Complain About

You may submit a complaint if you have a concern or dissatisfaction regarding Compass's benchmark administration service. This includes complaints about:

- Whether a specific benchmark determination is representative of the underlying interest it seeks to measure
- The application of the rules and procedures governing benchmarks administered by Compass in relation to one or more specific benchmark determinations
- Any other decision made by Compass as benchmark administrator in relation to a benchmark determination or other processes

How to Submit a Complaint

Formal complaints must be submitted through the designated communication channel described below. To ensure complaints receive appropriate attention, they will not be accepted through phone calls or other informal channels.

Contact Details

Email: compliance@compass-ft.com

When submitting a complaint, the following minimum information is required. Without it, we will not be able to investigate or process the complaint:

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- Your full name
- Company name (if applicable)
- Description of the complaint including the name of the benchmark/index, the date of the issue, and a detailed description of the issue and its impact

During our investigation, we may ask you for additional information. We encourage you to respond to any such requests promptly, as we may not be able to continue our review until we have received the information requested.

Confidentiality

The information provided by the complainant may be used throughout the investigation and reporting processes and, as such, may not be kept confidential, in particular in connection with any related legal, regulatory or other types of proceedings.

What to Expect After Submitting a Complaint

Our Commitments to You

1. **Thorough investigation:** Complaints are managed through a dedicated complaints handling system inside the Information Wall. The Legal and Compliance department will investigate. Any member of Legal and Compliance directly involved in the subject matter will be recused from the compliant review process. The complaint will be escalated as appropriate depending on its nature and subject matter.
2. **Decision and notification:** If the investigation warrants a material change to a benchmark, the change will be announced publicly before it is made and before the complainant is notified. The complainant will be notified in writing (via email) within a reasonable period following the outcome, unless such communication would be contrary to law, regulation or the objectives of public policy.

Possible Outcomes and Remedies

Where a complaint is found to be justified, Compass will select a remedy that is proportionate and appropriate to the shortcoming identified. Possible remedies include:

- A clear explanation of what happened
- A review or change of the decision relating to the service you received
- Provision of the service you originally requested
- A change in our internal procedures to prevent similar issues in future

- A material change to the relevant benchmark/index methodology and/or processes, any such change will be announced publicly before it is implemented and before the complainant is notified
- Additional training for our staff

Record Keeping

Every complaint received is recorded and tracked from receipt through to resolution. Relevant records concerning the complaint are retained for a minimum of 5 years, subject to applicable law or regulation..

Contact Us

If you have any questions about this Policy or wish to submit a complaint, please contact us at:

Compass Financial Technologies

Email: compliance@compass-ft.com

Web: www.compass-ft.com