

Complaints Handling Policy June 2021

Fastmarkets aims to provide its subscribers with timely news and quality pricing information on the metals, mining, industrial minerals, forest products and agricultural products markets that meets the highest standards. In the event that a customer has a question, wishes to raise issues or provide feedback, we provide several levels of service designed to handle complaints and promote the reliability of our methodologies through stakeholder input.

For a formal complaint to be designated as such, the complainant must record the formal complaint in writing and expressly state his/her wish for it to be handled as a formal complaint. A formal complaint skips steps 1 & 2 described below and is directly handled by the Risk & Compliance Team in accordance with steps 3 & 4 below.

Informal complaints shall be treated with the same general standards as formal complaints. However, they do not necessarily need to be in written form and most are typically handled in line with steps 1 & 2 below. Where a dispute cannot be resolved through routine inquiries and discussions with the Global Editor and/or the Editorial Director, then the complainant is referred to the formal complaints policy process..

1. Routine inquiries

Most inquiries can be handled by the reporter responsible for specific pricing. If you would like a number or methodology to be double-checked, the reporter will open an inquiry and consult with his/her team leader before providing you with a response.

2. Escalation to Editor of Fastmarkets

If you are not satisfied with the response at this level, or if you have any concerns, you may immediately contact Fastmarkets' editorial team (see contact details).

3. Escalation above the Fastmarkets editorial team

To escalate your concern regarding any type of issue (eg, market value, proposed changes to a price assessment or index, applications of methodology in relation to a specific price assessment and other editorial decisions in relation to price-assessment processes), you should submit your complaint in writing to Fastmarkets' Risk & Compliance Team (see contact details), expressly stating that they wish the complaint to be handled as a formal complaint.

You should include your name, company, contact details, and details of the specific issue under dispute. You should include as much background information as possible and attach all relevant materials and/or evidence where appropriate.

4. Complaints Policy Process

The Risk & Compliance Team will independently investigate any formal complaints in a timely and fair manner. The team will consult with the Divisional Director where necessary and appropriate to do so. Any complaint related to prices subject to the EU Benchmark Regulation (BMR) will be reported, reviewed and overseen by the Managing Director of our benchmark administrator, Fastmarkets Benchmark Administration Oy (FBA). Once a complaint is received, it will be acknowledged in writing within three business days; Fastmarkets' Risk & Compliance Team will also log the issue in our Complaints Register before promptly commencing an investigation.

A written response to the complainant will be provided within 28 days from the date of receipt of the complaint. The response will include details on how the investigation was carried out, an explanation of our decision and our planned or completed actions as a result where applicable.

Should the complaint result in a change in content or a price published by Fastmarkets, that new content or new price is communicated to the market without delay via a pricing notice and the database is updated. Please see our [Corrections Policy](#) for further details.

5. Appeals for Review Process

After going through the complaints process, a complainant has the option to appeal any aspect of how the complaint was handled or further question any of the pricing and methodology explanations.

- **How to:** A complainant may initiate the appeals for review process by informing Euromoney Institutional Investor plc's General Counsel of their dissatisfaction with how their formal complaint was handled and/or its results. All such appeals for review are also reviewed by Fastmarkets' Managing Director and Risk & Compliance Team.
- **Recourse to appropriate independent third party:** If a complainant is dissatisfied with the way a complaint has been handled, an appropriate independent third party may be appointed within six months of the date of written submission of the original complaint to resolve that complaint. The cost of the independent third-party engagement shall be borne by Fastmarkets in the event that the complaint is upheld and otherwise borne by the complainant.

Important notes

Please note: You must make your **written complaint, appeal for review** and **recourse to an independent third party**, if necessary, within six months of the date of the original complaint.

Also, please note that all formal complaints and feedback received will be documented in our Complaints Register and we will retain all documentation related to the complaint for a minimum of five years.

Group structure

- Euromoney Institutional Investor plc (parent)
- Fastmarkets (price reporting agency (PRA))
- Fastmarkets MB, Fastmarkets AMM, Fastmarkets IM, Fastmarkets RISI, Fastmarkets FOEX and Random Lengths (PRA news services/publications)

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