Nordic Bond Pricing

COMPLAINTS HANDLING PROCEDURE

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1 INTRODUCTION

This document represents the Complaints-handling procedures of Nordic Bond Pricing AS ("NBP") and sets out the procedure NBP will follow in the event of a complaint being received about the determination of an Index. The procedures are pursuant to Article 9 of Regulation (EU) 2016/1011 (the "Benchmark Regulation" or "BMR").

This Policy applies to all Indices or Benchmarks or Family of Benchmarks administered and provided by NBP within the meaning of BMR.

'Index' (or 'Indices') and 'Benchmark(s)' are used interchangeably in the Policy. Refer to BMR definitions for exact definitions of the terms and the context which they are used. An Index becomes a Benchmark by usage, defined in BMR Article 3(1)(3).

A complaint may relate to any aspect of the NBP Index determination process, including: (a) whether a specific Index determination is representative of market value; (b) on a proposed change to the Index determination process; (c) on an application of the methodology in relation to a specific Index determination; (d) and on other decisions in relation to the Index determination process.

2 PRINCIPLES

The following principles apply to all benchmark determination complaints raised with NBP:

(i) All investigations of a complaint raised by any party to NBP must be handled in a fair and timely manner;

(ii) The investigation of a complaint shall, as far as practicable, be conducted by parties independent of those involved in the subject of the complaint;

(iii) Resolution of the complaint will be communicated to the third party raising it, once the NBP decision has been approved;

(iv) No complaint should be closed without the party raising the complaint confirming that it has been properly addressed in accordance with this policy; and

(v) All records and correspondence relating to any complaints, queries or issues must be kept by NBP for five years.

3 PROCEDURE

If an Index user, market participant, or other party wishes to raise a complaint regarding NBP's Index methodology or any other aspect of the Index determination process they should first contact the NBP at info@nordicbondpricing.no and detail the basis for their complaint.

(i) On receipt of a complaint, the NBP will:

(a) Escalate the issue to the relevant team best placed to address the complaint and ensure they have all the information provided relating to it.

(b) Confer with the complainant, if necessary, to ensure the nature of the query or complaint is fully understood. NBP will seek to acknowledge receipt of the complaint within one business day.

(ii) The resolution time for a complaint will vary according to the nature of the issue and the level of investigation it may require. NBP will provide updates as to the status of the issue and anticipated timescales to resolution.

(iii) 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. After this has been sent, NBP will contact the complainant by telephone to ensure that they were satisfied with the resolution of their complaint.

(iv) In all cases of a complaint, a written response will be provided to the complaint by NBP. In the event that the complainant disagrees with such decision or considers there are grounds for appeal the issue will be escalated to the CEO and the matter will be debated by the Board of Directors. The decision of the Board of Directors is final, and the complainant will be notified of the outcome following the meeting of the Board of Directors.

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