

Complaints policy

What constitutes a formal complaint

- 1.1 This Complaints applies to the provision of Expana Benchmark Prices assessments, methodology, and to the Expana Market Reporting Team.
- 1.2 For the purposes of this Complaints Policy, any reference to Expana also includes the Expana Market Reporting Team.
- 1.3 Complaints may relate to any of our activities and may include (but not be limited to):
 - 1.3.1 The adherence to the Expana Benchmark Prices Methodology in an assessment;
 - 1.3.2 The behaviour and/or professional competence of our employees; or
 - 1.3.3 Publication delay of Expana Benchmark Prices assessments by Expana.
- 1.4 The following are not considered to be Formal Complaints and should therefore be directed to the Commodity Insights Team via PRA@expanamarkets.com:
 - 1.4.1 General questions about our Expana Benchmark Prices and their assessments or rationales;
 - 1.4.2 Clarifications and queries on Expana Benchmark Prices, their methodology, assessments or rationales;
 - 1.4.3 Disagreements with Expana Benchmark Prices and their assessments or rationales that cannot be substantiated;
 - 1.4.4 Disagreements with the Expana Assessment Methodology; feedback is always welcome via our Methodology Change process. You can email methodology@expanamarkets.com to provide your feedback and suggestions;
 - 1.4.5 Requests to change a Expana Benchmark Price assessment or rationale;
 - 1.4.6 Notifications of incorrect methodology applied to an assessment;
 - 1.4.7 Matters concerning, and questions about, third-party data prices republished by Expana;
 - 1.4.8 Matters concerning the data contributors for Expana Benchmark Prices;
 - 1.4.9 Matters concerning contractual or other legal disputes;
 - 1.4.10 Formal requests for the disclosure of information, for example, under the Data Protection Act.

What to include in your formal complaint

When making a Complaint, we ask you to please provide the following information in as much detail as is reasonably possible:

- Your name, address, telephone number and email address (we will contact you using your preferred contact method when your Complaint is handled);
- If you are making a Complaint about a particular price assessment, the price assessment's published name, code, the date(s) of the assessment(s) in question and your reasoning for why the price(s) should be different;
- If you are making a Complaint about a particular employee of the Expana Market Reporting Team, the name and, where appropriate, position of that employee;
- Further details of your Complaint including, as appropriate, all times, dates, events, and people involved and the reason for the Complaint, and which steps, if any, have been taken to resolve this issue prior to your Complaint;
- Details of any documents or other evidence you wish to rely on in support of your Complaint.

Key points from the Expana complaints policy

Further to this, Expana maintains a Complaints Policy. Key points from the complaints handling policy are:

- 2.1** Expana operates a two-stage complaint handling procedure. Following our Complaints Procedure, our aim is to always resolve Complaints at Level One without further recourse to Level Two. However, if you are not satisfied at the end of Level One, you may escalate your Complaint to Level Two.
- 2.2** Level One:
 - 2.2.1** Upon receipt of your Complaint, the Group General Counsel will log the Complaint and will acknowledge receipt of it in writing within three (3) working days, giving you a Complaint Reference.
 - 2.2.2** When we acknowledge receipt of your Complaint, we will also provide details of your Complaint Handle. This may be the GGC to whom your original Complaint was directed (as above) or your Complaint may be assigned to another appropriate member of our team. Expana will assign an individual to investigate the complaint who was not directly involved in the assessment process to allow for the investigation to be handled independently.
 - 2.2.3** If your Complaint relates to a specific employee, that person will be informed of your Complaint and given a fair and reasonable opportunity to respond. Any communication between you and the employee in question should take place only via the Complaint Handler and we respectfully ask that you do not contact the employee in question directly concerning the Complaint while we are working to resolve it.
 - 2.2.4** If we require any further information or evidence from you, the Complaint Handler will contact you as quickly as is reasonably possible to ask for it. We ask that you make reasonable efforts to supply any such information or evidence quickly in order to avoid delaying the complaint handling process. If you are for any reason unable to provide such information or evidence, we will make reasonable efforts to proceed without it. Please be aware, however, that we will not ask for further information or evidence unless we consider it important to the successful resolution of your Complaint.
 - 2.2.5** We aim to resolve Level One Complaints in a timely and fair manner, but within fifteen (15) working days. In some cases, however, particularly if your Complaint is of a complex nature, this may not be possible. If this is not possible for any reason, you will be informed of the delay, the likely length of the delay and the reasons for it.
 - 2.2.6** At the conclusion of the Level One Complaints Procedure, regardless of the outcome, we will provide you with full written details of our investigation, our conclusions from that investigation, and any action taken as a result. You will also be reminded of your right to appeal our decision and escalate the complaint to Level Two in the form of an Appeal.
 - 2.2.7** If a Complaint results in a change in price, this will be communicated to the market as soon as possible.
- 2.3** Level Two:
 - 2.3.1** If you are not satisfied with the resolution of your Complaint at Level One, you may appeal the decision within ten (10) working days, and have the Complaint escalated to a Level Two Appeal. Level Two Appeals are handled directly by the GGC.
 - 2.3.2** Appeals, quoting your original Complaint Reference, should be directed to your original Complaint Handler who will forward the request to an appropriate Appeal Handler. Receipt of Level Two Appeals will be acknowledged in writing within three (3) working days. When we acknowledge receipt of your Appeal, we will also provide details of your Appeal Handler.
 - 2.3.3** If your Complaint relates to a specific employee, that person will be informed of your Appeal and given a further opportunity to respond. Any communication between you and the employee in question should take place only via the Appeal Handler, and we respectfully ask that you do not contact the employee in question directly concerning the Appeal while we are working to resolve it.

- 2.3.4** If we require any further information or evidence from you, the Appeal Handler will contact you as quickly as is reasonably possible to ask for it. We ask that you make reasonable efforts to supply any such information or evidence to us quickly in order to avoid delaying the complaints handling process. If you are for any reason unable to provide such information or evidence, we will make all reasonable efforts to proceed without it. Please be aware, however, that we will not ask for further information or evidence unless we consider it important to the successful resolution of your Appeal.
- 2.3.5** We aim to resolve Level Two Appeals in a timely and fair manner, but within thirty (30) working days. In some cases, however, particularly if your Appeal is of a complex nature, this may not be possible. If this is not possible for any reason, you will be informed of the delay, the likely length of the delay and the reasons for it.
- 2.3.6** At the conclusion of the Level Two procedure, regardless of the outcome, we will provide you with full, written details of our investigation, our conclusions from that investigation, and any action taken as a result. Our decision at this stage is final, subject to your right to seek External Resolution of your Complaint by an independent third party appointed by Expana. You have six (6) months from the day you first raised the complaint with Expana to inform us that you would like to seek an External Resolution. The independent third party appointed by Expana will investigate the complaint and provide a written response to the complainant within forty (40) working days.
- 2.3.7** If a Complaint results in a change in price, this will be communicated to the market as soon as possible.



Contact us

For more information on Expana's complaints policy,
email methodology@expanamarkets.com