



Vista Benchmark Administration

## Complaints Policy

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Vista Benchmark Administration (VISTA) has created this policy to address the submission and handling of complaints concerning the Administrator's Benchmark determinations for VISTA Indices. This document sets out procedures for submitting, investigating, escalating and recording complaints.

### Complaints Covered by this Policy

Complainants (individuals or entities who are Stakeholders) may submit complaints under this policy that concern the Administrator's Benchmark determination, including (but not limited to) complaints regarding:

- Whether the Benchmark determination is representative of the underlying interest it seeks to measure,
- The determination and application of the Benchmark methodology, and
- The calculation of the Benchmark.

### Submissions

Complaints should be submitted with the appropriate contact information and as much detail as possible about the concern to allow the Administrator to properly assess the complaint.

Stakeholder may submit complaints to the following email address: [complaints@vistacap.com](mailto:complaints@vistacap.com). When submitting a complaint via email, please write in the subject line the nature of your complaint.

Stakeholder may also submit complaints by U.S. mail to:

Compliance Department  
C/O Vista Index Services  
16 York Road, Larchmont NY1053

### Investigation

VISTA's compliance team will review complaints as follows:

- An acknowledgement of receipt will be sent to the Complainant,
- The compliance team will conduct an initial review and make a decision on whether to investigate further,
- If investigated further, personnel who are not the subject of the complaint will conduct the investigation. The personnel assigned to investigate will not be from the same department to the party and as far as possible to not have a professional connection to the party,
- Investigations are expected to be conducted within 10 business days unless circumstances require a longer time period,
- The Complainant will be notified in writing within 10 business days if the final outcome of the complaint cannot be determined within this timeframe. An explanation of why the investigation outcome has been delayed will be provided (to the extent possible),
- Upon completion of the investigation, a report will be drafted, detailing the findings along with any remediation plans to resolve the complaint and, if necessary, to prevent reoccurrence. The Complainant will be advised of the outcome of the complaint and, as applicable, of the agreed resolution, and

- The Complainant may dispute or appeal the final outcome by following the complaint submission process outlined herein. The appeal should be submitted within 15 business days of VISTA communicating the outcome to the complainant.

### **Escalation**

A complaint may be escalated to the Oversight Committee under the following circumstances:

- Where the compliance team believes that the circumstances require input from the Oversight Committee,
- If, following the investigation, the resolution of the complaint will entail the use of a significant amount of resources, and
- If following an investigation and the implementation of a resolution there is a reoccurrence of the issue that was the subject of the complaint.

Appeals to the final outcome of the complaint will also be escalated to the Oversight Committee.

### **Record Keeping**

All documents relating to a complaint, including those submitted by the Complainant, the Administrator's own records, the investigating personnel's report and all related documents will be retained by the Administrator for a minimum of five years.

*October 2022*