



Complaints Handling Policy

Version: 2.2

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Overview and Introduction

Spark Commodities Pte Ltd and Spark Commodities UK Ltd (together “**Spark**”) is committed to providing customers and stakeholders with robust price assessments, across assets and asset classes, that are free of conflicts of interest and comply with relevant laws, regulations and the IOSCO Principles for Oil Price Reporting Agencies.

Spark maintains this complaints handling policy in respect of the Spark benchmark price assessments (“**Spark Prices**”). The policy aims to provide transparent and clear guidance around how market participants may submit a complaint regarding the Spark Prices and related methodologies, and how Spark handles such complaints.

Market participants may, from time to time, contact Spark regarding the Spark Prices in order to seek clarifications, better understand a methodology or to challenge a particular price assessment. Spark values those interactions and has documented policies in respect of those interactions where appropriate, including for corrections and restatements.

Submitting a Complaint

In order to enter the formal complaints process, the complainant must send an email detailing their complaint to legal@sparkcommodities.com. Complaints may be submitted in relation to the Spark Prices and any aspect of their administration.

Spark’s Complaint Handling Process

Spark’s Head of Risk and Compliance will be the individual responsible for investigating all complaints. If the complaint is about the Head of Risk and Compliance, an appropriate alternative will be identified and assigned.

The key stages in the complaints handling process are as follows:

- Written acknowledgement of the complaint within five (5) business days; - Within thirty (30) business days, a formal written response, explaining our findings and final decision, as well as any course of action taken or recommended by the Head of Risk and Compliance OR, if necessary, a written response from Spark to the complainant advising that further investigation is necessary and indicating when a final decision or further update will be provided; and
- In the event that the complainant is dissatisfied with the response from Spark, the complainant may request, in writing and within forty five (45) business days of Spark’s final decision, that the complaint be referred to a suitably qualified independent third party appointed by Spark.

Record Keeping and Review

Spark will retain all records relating to complaints, including any documents and records submitted by the complainant, for a minimum period of 5 (five) years.

The Head of Risk and Compliance will review - at least annually - all complaints received to determine the existence of any trends and will review this policy. The results of both

reviews will be presented to Spark's Compliance and Governance Committee.