

# Complaint Handling Procedure

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# 1 DFBB Philosophy

The purpose of the DFBB is to support the integrity, accuracy and reliability of DFBB Benchmarks and other locally or regionally relevant future benchmarks to the benefit of all users of the benchmark(s) and reliant market participants. It aims to fulfill its purpose without creating any cause for complaints by its customers, market participants, end users of the DFBB benchmarks or the broad stakeholder community. However, the DFBB understands and accepts that at times its actions may impact on its customers and others in a way that may lead to informal and formal complaints.

DFBB makes available its complaints-handling policy on its website ([www.dfbf.dk](http://www.dfbf.dk)) through which complaints may be submitted on whether a specific benchmark determination is representative of market value, on a proposed change to the benchmark determination process, on an application of the methodology in relation to a specific benchmark determination, and on other decisions in relation to the benchmark determination process;

DFBB takes all complaints seriously and has implemented this Complaints Handling Procedure to deal with these issues in the best interests of business improvement, and efficiency.

DFBB will strive to do the following in regard to each complaint;

1. We will listen to the complaint. We will accept ownership of the problem. We will thank the complainant for bringing the problem to our attention.
2. All complainants will receive acknowledgement with each complaint they make.
3. We will be understanding. We understand that the individual is complaining about our business and has gone out of their way to complain. We will take responsibility for resolving the problem.
4. We will record and detail the complaint so we understand clearly what the problem is and how we can explain it to others who may be able to resolve it.
5. We will discuss options to resolve the problem if we can immediately.
6. We will let the complainant know when we will be able to get back to them with a resolution or answer to their complaint.
7. We will keep our promises in regard to resolutions that we put in place.
8. We will follow up with the complainant to make sure that they are happy with how their complaint was handled.
9. If possible, we will let the complainant know what steps we have put in place to make sure similar problems do not happen again.

## 2 Definition of Complaint

A complaint is considered to be an expression of dissatisfaction made to DFBB or its employees related to services that it provides, where a response or resolution is explicitly or implicitly expected.

## 3 Handling of Personal Information

Personal information is handled in a manner consistent with the Danish Personal Information laws, on the Protection of Personal Data and GDPR. This refers to maintaining confidentiality of personal information of the complainant. Generally, the complaint and any information related to it, is kept confidential except with the consent of the complainant.

## 4 The Complaints Register

The DFBB Compliance Officer maintains a Complaints Register. In respect of each complaint, the Complaints Register contains a Complaint Form completed by the complainant through the DFBB website and copies of all correspondence between the DFBB and the complainant.

Complaints documentation is subject to the record-keeping policies of the DFBB.

The DFBB Compliance Officer is responsible for updating the DFBB Complaints Register.

## 5 Complaints Handled Free

Complaints are handled free of charge to the complainant, subject to any statutory requirements.

## 6 Procedural Process

### 6.1 Receive and Classify

DFBB will ensure that complaints are captured by DFBB, and classified for escalation, review and action as required.

- Complaints will be logged and classified for action.
- Complaints, internal or external will be filed through the online Complaints Form, accessed through the DFBB website.
- Complaints filed through the online form include all relevant contact details for the relevant person(s) making the complaint so that complaint decisions can be delivered to the correct recipient, and follow up conversations can be conducted in the event they are deemed necessary.
- Complaints are registered in the DFBB Complaints Register and any other appropriate recording and reporting mechanisms that may be agreed to for services provided to specific customers.
- Complaints are prioritised by the DFBB Compliance Officer.
- The DFBB Compliance Officer decides on the appropriate person(s) to carry out subsequent steps, including the investigation.

### 6.2 Acknowledgement

DFBB ensures that every complaint receives a formal written acknowledgement, containing an expectation of when they will receive a response, and the person dealing with it.

- Complaints, regardless of priority, will receive an acknowledgement sent out by mail or email no later than 5 working days after receipt by DFBB.
- The DFBB Compliance Officer conducts a completeness review of the complaint to ensure that sufficient information has been provided to initiate and execute an investigation. If further

information is required by DFBB, requests may be made to the complainant to provide clarifying or more detailed information.

- DFBB is committed to respecting the confidentiality of complaints, and to the extent permitted by Law, not disclosing the identity of individual complainants.
- DFBB may need to collect information from the complainant to resolve the issue and this may require information being shared within the organisation.

### 6.3 Investigate

DFBB follows up aspects of the complaint, both internal and external, to ensure that the key facts are identified and clarified.

- The DFBB Compliance Officer holds primary responsibility for receiving, investigating and managing all complaints. The DFBB Compliance Officer also takes into consideration contractual and legal obligations of DFBB. All complaints are added to the complaints register and escalated to the Risk and Compliance Committee.
- The DFBB Compliance Officer will instigate an investigation involving, where applicable, legal, HR or DFBB Manager to investigate the cause and implications of the complaint.
- Complaints received by DFBB are investigated on a timely and fair basis by personnel who are independent of any personnel who may be involved in the subject of the complaint.
- The DFBB Compliance Officer is bound to professional confidentiality when processing the complaints, with regard to relevant parties. If the DFBB Compliance Officer is party to a complaint made by an internal employee or an external third party, the aforementioned will recuse himself or herself and DFBB Risk and Compliance Committee will appoint a temporary manager to manage the complaint process.
- Those complaints that cannot be resolved will be escalated to the DFBB Board and final decisions will be provided to the complainant.
- The priority of the complaint will drive the timescale for completion (1 day for urgent or 10 days for non-urgent). However, due to the complexity of some complaints and the availability of staff, some complaints may take longer to finalise.

### 6.4 Resolve and Confirm

Ensure that the final resolution is clear and fair and confirm the proposed action and resolution addresses the complaint.

- The DFBB Compliance Officer will have responsibility for reviewing and determining the most appropriate course of action to be taken to resolve the complaint and determining whether or not a client or external entity is impacted.
- Complaint decisions will aim to address the concerns of the complainant and relevant person(s) and also provide any remedial actions that will be taken to address the subject and nature of the complaint.
- When providing a final decision that does not fully satisfy the complainant's demand, the final decision will include a written explanation of DFBB's position on the complaint.

- The review should include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent further occurrence.

## 6.5 Respond to complainant and any other affected parties

DFBF provides the complainant with the resolution within the timescales promised.

Once the validity of the complaint has been determined and investigated by the DFBF Compliance Officer, subject to privacy, legal issues and contractual requirements for notifications of complaints, any affected parties will be notified within the agreed timescales by an agreed method of disclosure.

If this cannot be done on time the complainant will be contacted to request further time.

Following the resolving of the complaint, the complainant or relevant person(s) may appeal the decision made by the DFBF Compliance Officer. An appeal will be reviewed by the Board of DFBF, for a final adjudication. Appeals for review should be made within a reasonable period of time and without unnecessary delay.

## 6.6 Follow up

DFBF ensures that complaints are followed up to confirm that complainants are satisfied that the complaint was dealt with in accordance with the Complaints Handling Procedure.

Complainants will be contacted by the DFBF Manager to ascertain their satisfaction with the process and if the complaint was handled properly and fairly.

Any negative responses to these questions should be referred to the DFBF Compliance Officer and the DFBF Board for action and direct follow up with complainants.

## 6.7 Quality Assurance

DFBF ensures that the organisation as a whole is aware of complaints and any underlying issues that caused them. DFBF will take remedial action to prevent future recurrences.

The DFBF Compliance Officer analyses on an ongoing basis, complaints handling data to identify and address any recurring or systemic problems and potential legal and operational risks.

All current complaints are reviewed quarterly as part of review meetings.

Any complaints where action can be taken to avoid recurrence are acted upon and raised with the appropriate managers/teams across the organisation.

Information and related complaints data is stored for a minimum of 5 years.