

Complaints Handling Policy  
September 2024

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# 1 Introduction

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

SFBF makes available its Complaints Handling Policy and Portal on its website ([www.swfbf.se](http://www.swfbf.se)) through which complaints may be submitted on, for example, if the STIBOR determination is representative of market value, on a proposed change to the STIBOR determination process, on an application of the methodology in relation to the STIBOR determination, and on other decisions in relation to the STIBOR determination process;

SFBF 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.

SFBF 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 for 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 SFBF or its employees related to services that it provides, where a response or resolution is explicitly expected and formally stated.

## 3 Handling of Personal Information

Personal information is handled in a manner consistent with the Swedish 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 Compliance Officer (1<sup>st</sup> LoD) maintains a Complaints Register. In respect of each complaint, the Complaints Register contains a Complaint Form completed by the complainant through the SFBF website and copies of all correspondence between the SFBF and the complainant.

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

## 5 Procedural Process

### 5.1 Receive and Classify

SFBF will ensure that complaints are captured, 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 SFBF 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 SFBF 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 Compliance Officer (1<sup>st</sup> LoD).
- The Compliance Officer (1<sup>st</sup> LoD) decides on the appropriate person(s) to carry out subsequent steps, including the investigation.

### 5.2 Acknowledgement

SFBF 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 SFBF.
- The 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 SFBF, requests may be made to the complainant to provide clarifying or more detailed information.
- SFBF is committed to respecting the confidentiality of complaints, and to the extent permitted by Law, not disclosing the identity of individual complainants.
- SFBF may need to collect information from the complainant to resolve the issue and this may require information being shared within the organisation.

### 5.3 Investigate

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

- The Compliance Officer holds primary responsibility for receiving, investigating and managing all complaints. The Compliance Officer (1 LoD) also takes into consideration the contractual and legal obligations of SFBF. All complaints are added to the complaints register and ultimately escalated to the SFBF Board of Directors in accordance with the Escalation Matrix.
- The Compliance Officer (1<sup>st</sup> LoD) will instigate an investigation involving relevant parties to investigate the cause and implications of the complaint.
- Complaints received by SFBF 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 Compliance Officer (1<sup>st</sup> LoD) is bound to professional confidentiality when processing the complaints, with regard to relevant parties. If the Compliance Officer (1<sup>st</sup> LoD) is party to a complaint made by an internal employee or an external third party, the aforementioned will recuse himself or herself and the Head of Risk and Compliance (2<sup>nd</sup> LoD) will appoint a temporary manager to manage the complaint process.
- Those complaints that cannot be resolved will be escalated to the SFBF Board of Directors and final decisions will be provided to the complainant.
- The priority of the complaint will drive the timeline for completion.

## 5.4 Resolve and Confirm

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

- The Compliance Officer (1<sup>st</sup> LoD) 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 SFBF'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.

## 5.5 Respond to complainant and any other affected parties

SFBF provides the complainant with the resolution within the timelines promised.

Once the validity of the complaint has been determined and investigated by the Compliance Officer (1<sup>st</sup> LoD), subject to privacy, legal issues and contractual requirements for notifications of complaints, any affected parties will be notified within the agreed timeline 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 SFBF Compliance Officer (1<sup>st</sup> LoD). An appeal will be reviewed by the SFBF Board of Directors, for a final adjudication. Appeals for review should be made within a reasonable period of time and without unnecessary delay.

## 5.6 Follow up

SFBF 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 SFBF CEO 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 Compliance Officer (1<sup>st</sup> LoD) and the SFBF Board of Directors for action and direct follow up with complainants.

## 5.7 Quality Assurance

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

The Compliance Officer (1<sup>st</sup> LoD) 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.

# 6 Policy Review

This policy will be reviewed biennially.

## 6.1 Publication

This policy is made publicly available on the SFBF website.

## 6.2 Version history

Version	Issue Date	Changes
1.0	April 2020	Original release
2.0	9 November 2021	Revised release
3.0	19 September 2024	Revised release