

ICE CoT Complaints Policy

Introduction

ICE Benchmark Administration Limited (IBA) works hard to avoid complaints related to ICE CoT. However, IBA takes complaints very seriously and will endeavour to resolve any complaints quickly when they arise.

This Complaints Policy (policy) defines IBA's approach to complaint handling relating to the ICE CoT platform.

Complaints covered by this policy

This policy has been designed to address complaints regarding potential issues or concerns that may arise with the ICE CoT system's operation and is based on IBA's existing [complaints policy](#) related to its regulated benchmark business.

IBA has identified several areas that could potentially lead to complaints related to the ICE CoT platform including but not limited to:

- Technical or operational issues, including ICE CoT platform performance;
- Reference data and methodologies;
- Platform user issues; and
- System access issues

You may also use this policy to complain about the outcome of any ICE CoT Grievance Procedure or Challenge Process.

This policy intends to address all potential issues and/or concerns efficiently and effectively, ensuring fair resolution for all parties involved. It is important to note that this policy will operate alongside the ICE CoT Grievance procedure and the ICE CoT Challenges Process.

Complaints not covered by this policy

Please note that this policy does not cover:

- Matters properly subject to the ICE CoT Grievance procedure or the ICE CoT Challenges Process.
- Matters that have already been fully investigated through this policy, unless new evidence is available;
- Matters connected with or arising out of a contractual or commercial dispute involving IBA;
- Matters properly subject to the ICE CoT Membership Appeals Process;
- A complaint which is made more than 12 months after the complainant becomes aware of the circumstances giving rise to the complaint, unless there are reasonable grounds for delay; or
- Complaints about access to information where procedures and remedies are set out in legislation.

If IBA thinks that your complaint should be handled by another entity or via another process we will inform you promptly giving you the other entity's contact details or details of the process.

Making a complaint

IBA will accept complaints made by any reasonable means. If a complaint is not in writing, IBA may ask for the details to be put in writing or we may write to you by letter or email setting out our understanding of the complaint.

To help IBA review your complaint, we ask you to be clear about what the complaint is, to supply as much evidence as you can and also to let IBA know what action you are looking for us to take.

Factors that may be relevant in IBA's assessment of a complaint include:

- All the evidence available and the particular circumstances of the complaint; and
- Similarities with other complaints received by IBA

Handling complaints

On receipt of a complaint IBA will:

1. Write to you within 2 business days of receiving it to acknowledge the complaint and confirm that we are dealing with it.
2. Investigate the complaint carefully, diligently and impartially. This will be done by a senior member of IBA's staff who was not directly involved in the matter giving rise to your complaint. We may escalate the complaint as appropriate to IBA's Board of Directors, which is comprised of a majority of independent non-executive directors.
3. Decide whether we think that the complaint is justified. If in our view the complaint is justified, we will decide what remedial action is appropriate.
4. Write to you as soon as possible with our decision and explain clearly our assessment of the complaint, our decision on it and whether we propose any remedial action. If IBA cannot send you a final response within 8 weeks of receiving the complaint, we will write to you to explain why and to let you know when we expect to be able to complete the review and give you our final response.
5. If deciding to uphold a complaint, consider whether others who have not complained to us nevertheless may have had cause to complain.
6. If deciding not to uphold the complaint, no further action will be taken.

During IBA's review of the complaint, we may need to get further information from you and/or from others. We may also need to get clarification of the information you have provided to us. If we ask you for further information or validation, please respond to us as soon as possible as we may be unable to continue to review the complaint in the meantime.

Confidentiality

IBA will keep the matter of your complaint confidential as far as possible but it may be necessary for us to contact third parties for information. IBA will endeavour to do this without identifying you if this is possible. You may advise IBA that you will not allow us to identify you as the complainant but in such circumstances it may be impossible for us to complete our review of your complaint.

Recording complaints

IBA will retain all complaints records for at least 5 years.

Complaints contact information

IBA's contact details for complaints are:

ICE Benchmark Administration Limited

2nd Floor

Sancroft

Rose Street

Paternoster Square

London EC4M 7DQ

Telephone: +44 (0)20 7429 7100

Email: iba-icecotcomplaints@ice.com

A complainant wishing to write direct to the Board of IBA or to the Advisory and Oversight Committee is asked to mark the envelope accordingly.

Review

This Complaints Policy is reviewed at least annually by the ICE CoT AOC and the IBA Board.

September 2025