

CanDeal Data and Analytics (CanDeal DNA)

Complaints and Whistleblowing Policy



Purpose

This document sets out the policy and procedures by which CanDeal DNA ensures that it receives, appropriately investigates, and resolves complaints and whistleblowing relating to its Evaluated Pricing, Reference Pricing, and Market Price Services (“DNA Services”) in a timely and fair manner and in accordance with IOSCO Principles.

Complaints, whistleblowing management

CanDeal DNA will maintain the complaints management process for fair, prompt, and effective handling of complaints. As such, CanDeal DNA has established and implemented a transparent complaints management procedure ensuring prompt and effective handling.

Complaints

Definition

For the purposes of this policy, a complaint is defined as any written expression of dissatisfaction, whether justified or not, from or on behalf of a person or company about the methodology of the DNA Services or any proposed change to the DNA Services, or whether:

- CanDeal DNA accurately and reliably represents that part of the market or economy it is intended to represent
- a determination of CanDeal DNA Service was made in accordance with its stated methodology

Examples

- Issues surrounding interpretation or transparency of the methodology of CanDeal DNA Services;
- Delays in the publication of, or information relating to, CanDeal DNA Services;
- Any errors in information published by CanDeal DNA relating to its Services;
- Any identified errors in calculation; and
- Any issues related to the integrity of CanDeal DNA Services.

Complaints are submitted through e-mail to DNASupport@CanDeal.com and must include as much information as possible, such as:

- your name, title, the institution you represent, your e-mail address, and telephone number
- the date or date range of the incident (if applicable)
- a detailed description of the complaint

Complaints handling process

1. Acknowledgement of receipt

- Within 24 hours of receiving the complaint form, CanDeal DNA will acknowledge in writing receipt of the complaint, indicating that the complaint is being investigated, and that a



response will be provided in due course including findings and any corrective action.

2. Investigation

- The investigation of the complaint will be conducted in a timely and fair manner with a target of 10 business days from receiving the complaint to complete a preliminary investigation.
- Any required information or explanation will be sought from any relevant business or support functions and from the complainant, as necessary.
- The investigation of the complaint will be conducted by an individual or individuals independent of the persons that might have been involved in the subject matter of the complaint.
- The investigation will determine whether the complaint is upheld, and if so, what corrective actions may be appropriate in response to the issue.

3. Response

- The outcome of the investigation will be communicated promptly, and in clear language, to the complainant. If a complaint is partially or fully rejected, reasons will be given with a reasonable level of detail.
- If the complainant is dissatisfied with the outcome of the investigation, the complainant will have 5 business days to dispute the decision.
- The escalated complaint will be reviewed by a CanDeal DNA executive other than the individual that investigated the complaint, who may decide to refer the matter to the CanDeal Group CEO and/or the Governance Committee.

Whistleblowing

CanDeal DNA fully supports whistleblowing and is committed to protecting whistleblowers, the important information they provide and more widely, the integrity of the whistleblowing process within CanDeal DNA. Consequently, all persons who are considering reporting their concerns in good faith can be assured that their concerns will be taken seriously, that confidentiality of reports is maintained to the fullest extent possible, and information is shared on a need-to-know basis only. In addition, if you are a CanDeal DNA employee, you will be protected against retaliation.

Individuals may submit confidential and anonymous whistleblowing concerns in English or in French online or through a confidential telephone line:

- CanDeal DNA whistleblowing portal at <https://candeal.ethicspoint.com>
- Dial toll free at 1-833-416-6298

Record Keeping

CanDeal DNA will keep records and all documents relating to a complaint including telephone conversations (if applicable), voice-mail messages, e-mail, and other electronic communications. Such records and documents will be kept for a period of seven years from the date that they were made or



received, whichever is later, in a safe location and a durable form, and in a manner that permits those records and documents to easily accessible.

REVISION HISTORY

Author	Version	Section(s)	Change(s)	Approved by	Date
Esther Klait	1.0	All	First Draft	Andre Craig	April 1, 2025