

INDEX COMPLAINT PROCESS

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FreightWaves, Inc. (“FreightWaves”) strives to provide products and services of the highest degree of quality and ethics. If you have a complaint regarding FreightWaves Indices (the “Indices”), please review this process in its entirety, then (if applicable), submit a complaint (“Complaint”) in accordance with the process identified herein.

What is a Complaint?

Complaints include any manner of complaint regarding whether a specific index or subindex is appropriately representative of the market it seeks to measure, complaints associated with announced changes to index methodologies or inclusions of data, complaints regarding any decisions surrounding an index, and complaints regarding the integrity of the index. Complaints do not include general questions regarding the index, solicitations, or general requests associated with products and services.

Complaint Submission Method

To ensure a complaint is properly processed and provided the appropriate level of attention, such must be submitted through a written complaint as described herein and sent via email to legal@freightwaves.com. Complaints will not be accepted through phone calls, facsimile, or other means of communication.

Complaints should be made with sufficient specificity to enable FreightWaves to adequately investigate and respond to the complaint. At a minimum a complaint should include:

- The full name of the complainant
- Preferred method and means of contact to reply to complainant
- Company name (if applicable)
- A detailed description of the complaint, including the name of the subject index or subindex, the date the issue occurred, a description of the issue, the impact of the issue, and any relevant information which would enable FreightWaves to investigate the complaint.

Prior to submitting a complaint any submitter must review and agree to FreightWaves privacy policy located at <https://www.freightwaves.com/privacy-policy>.

Complaint Review Process

FreightWaves has a procedure in place to address Complaints and to ensure such are timely reviewed and fairly reviewed. Complaints are reviewed by a member of FreightWave’s legal and compliance team. If the Complaint is properly formulated as described above in the submission method an investigation will be opened and the legal and compliance team will conduct a thorough investigation. If a Complaint is not properly formulated a response will be provided advising of the deficiencies of the inquiry and provide the complainant an opportunity to correct their submission. After an investigation is completed, and occasionally if warranted prior to completion of the investigation the complaint if necessary will be



escalated to the appropriate management teams and individuals within FreightWaves for further handling. If as a result of the investigation a material change to the index is warranted, the change will be announced before it is made and before the complainant is notified and in accordance with the governance documents.

Any information provided by the complainant may be used in the investigation and subsequent reporting processes, and as such may not be kept confidential. Certain legal, regulatory and other type proceedings may also require the disclosure of the information.

A complainant will be notified in writing (by email) within a reasonable time period following the conclusion of an investigation, unless such would violate legal, regulatory, public policy, or present other related concerns in the discretion of FreightWaves.

Relevant records relating to complaints and investigations will be kept for a minimum period of five (5) years, subject to legal or regulatory restrictions and requirements.