Benchmark Complaints Policy

11 September 2026 | Version 3.0

ASX is the licensed administrator of the Bank Bill Swap Rate ('**BBSW'**) benchmark in Australia. It also administers the End of Day Bank Accepted Bills ('**EOD BABs**') and the '**ASX Realised AONIA**' benchmarks (AONIA being the Reserve Bank of Australia Interbank Overnight Cash Rate) and **Secured Overnight Funding Index of Australia ('SOFIA').**

ASX is committed to conducting its business as a benchmark administrator in an open and accountable way.

While we try our best, we understand that we may not always get it right. Complaints provide us with valuable insights into the views and experiences of the users of ASX benchmarks and help us to improve the quality of our benchmark products and services.

We are therefore committed to listening to all complaints about our role as a benchmark administrator ('**benchmark complaints**') and dealing with them appropriately.

This document outlines ASX's policy and process for handling benchmark complaints.

What is a benchmark complaint?

ASX defines a 'benchmark complaint' as:

An expression of dissatisfaction made to ASX related to its role as a benchmark administrator where a response or resolution is expected.

It includes, but is not limited to, complaints:

- that a specific benchmark determination is not representative of the underlying interest it seeks to measure
- that the published methodology for the calculation of a specific benchmark has not been followed
- about any administrative decision ASX may make in relation to a benchmark, and
- about the pricing or fee structures for access to a benchmark.

Who can make a benchmark complaint?

Anyone who uses or is affected by an ASX benchmark can make a benchmark complaint to ASX. This applies even where they are not paying a fee to ASX for the use of the benchmark.

How do I make a benchmark complaint?

This depends on the nature of your complaint.

If you wish to request a review of ASX's determination of an ASX benchmark, please contact ASX Pricing immediately on:

E ASXBPricing@asx.com.au

Please note that in the case of BBSW, you must submit your request for review by 11:00am Sydney time or within 30 minutes of the publication of ASX's determination of BBSW, whichever is the later. In the case of SOFIA, you must submit your request for review by 10:00am Sydney time.

If you wish to report suspicious activity in relation to an ASX benchmark, please contact ASX or the Australian Securities Investment Commission ('**ASIC**') immediately on.

E benchmark.suspicious.activity@asx.com.au

E markets@asic.gov.au

If you wish to make any other type of benchmark complaint (including a complaint about the way in which ASX may have dealt with a request to review its determination of an ASX benchmark), you can do so at:

W Complain about an ASX benchmark
T 131 ASX (131 279)
+61 2 9338 0000 (from overseas)

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P ASX Investor Support Team
39 Martin Place
Sydney NSW 2000

ASX strongly encourages anyone wishing to make a benchmark complaint (other than to request a review of ASX's determination of, or to report suspicious activity in relation to, an ASX benchmark) to use the online facility mentioned above. This facility has been designed to collect all of the information that ASX needs to address a benchmark complaint and to ensure that this information is promptly delivered to the correct team at ASX to respond to the complaint.

Can I make an anonymous benchmark complaint?

Yes, you can.

Will my privacy be respected?

Yes. ASX will not disclose the personal information you provide in a benchmark complaint to any third parties outside ASX unless: (1) ASX considers it reasonably necessary to do so in order to act on your complaint, (2) ASX is required or authorised by law to do so, or (3) you consent to the disclosure.

ASX's Privacy Statement has further details on how ASX handles personal information and your rights in relation to your personal information held by ASX.

Will ASX respond to my complaint and when?

You will not receive a response to your complaint if you make it anonymously, you do not provide a valid email address, or you specify in your complaint that you do not wish to receive any communications from ASX in relation to it.

Otherwise, if you submit a complaint through ASX's online facility for making benchmark complaints, you will receive an email acknowledging receipt upon its successful submission to that facility. If you submit a complaint by phone, email or letter, ASX will use its best efforts to acknowledge receipt of your complaint by email within 2 business days of receiving it.

Where possible, we will try to resolve your complaint as soon as we receive it. However, in some cases, we may need to review and investigate a complaint before we can respond.

Where we are not able to resolve your complaint immediately, we will use our best efforts to provide a formal response to your complaint within 5 business days of receiving it. If it looks like it is going to take us longer than that, we will advise you of the delay.

How will my complaint be handled?

The diagram below outlines at a high level the process ASX follows when it receives a benchmark complaint.

All complaints will be reviewed by the ASX's internal Benchmark Oversight Steering Group.

In accordance with ASIC's requirements for licensed Benchmark administrators, the investigation of any Benchmarks Complaints is independent of any personnel who may be, or may have been, involved in the process.

Record Retention

All Complaints records are kept for 7 years.

If I need to, how can I escalate my complaint?

If at any time you are not satisfied with the way in which ASX has responded to your benchmark complaint, you may escalate your complaint and the reason for your dissatisfaction:

Internally at ASX to:

General Manager, Product Management (Markets)

E Daniel.Sinclair@asx.com.au

P 39 Martin Place
SYDNEY NSW 2000

Externally to ASX's regulator:

Australian Securities Investments Commission:

W https://asic.gov.au/about-asic/contact-us/how-to-complain/report-misconduct-to-asic/

T 1300 740 895

P The Complaints Officer
Australian Securities and Investments Commission
GPO Box 9827
MELBOURNE VIC 3001

BBSW Complaints Policy Change Control

This document has been revised according to the table below:

Author	Comment	Effective date
ASX	ASX Benchmark Complaints Policy	30th July 2017
ASX	Amendment to time to request a review of the BBSW rates from 10.40am to 11.00am	31st May 2018
ASX	Amendment to ASX formal repose time from 15 business days to 5 business days	9th May 2019
ASX	Formatting changes	16th January 2020
ASX	Formatting changes and addition of change control table	15th March 2022
ASX	Inclusion of additional details in accordance with ASX Benchmarks license obligations	22nd August 2023
ASX	Annual Documentation review. Personnel update	14 October 2024
ASX	Annual Documentation review.	24 April 2025
ASX	Annual Documentation review, new branding, inclusion of SOFIA	19 December 2025
ASX	Remove date for SOFIA, Removal of Phone numbers, Change of address and template	11 September 2026

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