

## SMM Feedback, Inquiries and Complaints Policy

### SMM 反馈，争论，投诉政策

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#### 1. Purpose 目的:

This document sets the Complaints Policy by which Shanghai Metals Market ('SMM') ensures that its administration of metal indices is compliant with Principle 16 of the IOSCO Principles for Financial Benchmarks ("the Principles") regarding the establishment and publication of a written complaints policy by which stakeholders may submit complaints concerning the representativeness of a benchmark, the application of benchmark methodology and other administrator decisions in relation to a benchmark determination. SMM is committed to providing a high-quality service to all benchmark users and stakeholders and will handle any complaints promptly, diligently and impartially in accordance with this Policy. 本文件制定了投诉政策，上海有色网(SMM)通过该政策确保其金属指数的管理符合 IOSCO 金融市场基准原则（以下称“原则”）中关于制定和公布书面投诉政策的原则 16，利益攸关方可以通过该政策就基准的代表性、基准方法的应用和与基准确定有关的其他管理员决定提出投诉。SMM 致力于为所有基准用户和利益相关者提供高质量的服务，并将根据本政策及时、勤奋和公正地处理任何投诉。

We encourage all our customers to give us as much constructive feedback as possible. While we appreciate compliments, we value complaints just as much. Complaints allow us to identify where we can build improvements into our policies, processes and procedures and help us to address our customer's needs. 我们鼓励所有我们的客户尽可能给我们多的建设性的反馈。感谢称赞的同时,我们更重视有价值的投诉建议。投诉可以让我们明确在制度，流程，和程序中需要改进和完善的方面，帮助我们解决客户的需求。

#### 2. What is a complaint? 什么是投诉?

We define a complaint as an expression of dissatisfaction with the standard of our service or products. A complaint, which requires a response, can be provided by written, it can also be provided verbally with our complaints policy. Written complaints should take into account both traditional written communication (letters) as well as electronic submissions (email or a complaints submission functionality online). 我们定义作为一个投诉是以书面形式提交表达对我们的服务和产品的不满，并要求作出相应回复，同时，该投诉符合我们的投诉政策。

For example, customers or stakeholders could submit complaints on whether a specific benchmark assessment is representative of market value, proposed benchmark assessment changes, applications of methodology in relation to a specific benchmark assessment and other assessment decisions in relation to benchmark assessment processes. 例如,客户或利益相关者可以提出投诉关于一个具体价格评估是否可以代表市场价值，建议价格评估的改变，具体价格点的评估方法的运用以及与价格评估流程相关的其他价格评估决策。

Complaints with regards to subscription fees would not fall under this complaints policy and would need to be dealt with separately under normal commercial negotiation. This does not affect the

consumer rights as prescribed by the territory referenced within the SMM sales contracts. 关于订阅费用的投诉不包括在这个投诉政策, 该投诉需要与正常商业谈判区分处理。这并不影响包含在 SMM 销售合同中根据法律所规定的消费者权利。

### 3. How to complaint 如何投诉

All complaints should be submitted in writing to [complaint@smm.cn](mailto:complaint@smm.cn) or call into the hotline 021-31330333 and should state that they are a complaint in line with the SMM complaints process. 所有的投诉都应该通过 [complaint@smm.cn](mailto:complaint@smm.cn) 以书面形式提交或是通过客户服务热线电话 021-31330333, 同时应该申明该投诉符合 SMM 的投诉流程。

We encourage all parties to address any complaints to us as soon as possible as this provides the greatest opportunity for SMM to respond. 我们鼓励各方尽快提交任何投诉, 给 SMM 提供最好的回应的机会。

### 4. What to include 包括什么

Please supply us with as much information as possible that relates to your issue. In particular include: 关于你的问题和投诉请提供尽可能多的相关信息。

具体包括:

- Name(s) of the party or parties involved and preferred contact information. 各方的名称及联系信息。
- Details of relevant trade information you would like considered, including particulars such as prices, volumes, terms etc. (if appropriate). 相关具体的交易信息,具体包括如价格、数量、条款等(如果适用)。
- Details of specific benchmark reports, text or data in dispute. 具体受争议的价格报道,文本或数据。
- Details of any apparent failure by SMM staff to treat the customer fairly or provide the service as agreed in the customer agreement. 任何关于 SMM 员工未能遵守合规政策的具体细节。
- Details of any apparent failure to adhere to published methodologies. 任何未能符合已发布的价格评估方法论的具体细节。
- Details of any failure in any other aspect of our service. 任何未遵循其他方面的服务具体情况。
- Copies of any documents in support of the complaint. 任何关于投诉的支持性文件的复印件。
- Details of any previous correspondence held with SMM staff on the issue in question. 对投诉中提到的问题和与 SMM 员工的所有交流细节。

If SMM does not receive enough information to progress your complaint then it will request that you provide more information to enable the investigation to continue. As this is likely to delay the process we encourage complainants to provide as much information at the beginning of the process as possible. 如果 SMM 没有收到足够的信息, 我们会要求你进一步提供相关信息以确保调查可以继续。为了避免整个调查过程延误, 我们鼓励和建议投诉人在开始的就提供尽可能多的信息。

### 5. Process 过程

All complaints and further correspondence will be logged and all correspondence will be archived for at least 5 years following resolution of the complaint.

所有的投诉和进一步回复都将被记录和所有的相应回复也会至少保存 5 年。

Complaints will be investigated fairly, in a timely manner and will be dealt with in confidence. 投

诉将会被公平和及时的调查, 同时所有信息将会被保密。

In all cases, an investigation into a complaint will be conducted independently of any personnel who may be involved in the subject of the complaint. 在任何情况下, 任何涉及该投诉事件的人员不会参与该投诉的调查工作。

#### Stage 1 阶段 1

Customer Care Team (CC) will acknowledge receipt of the complaint within one working day and provide contact details for the SMM employee tasked with investigating the complaint. 客户服务组(以下简称 CC) 将在收到投诉的 1 个工作日内确认收到投诉, 同时向 SMM 内部将处理投诉的员工提供投诉人的联系方式。

The person responsible for investigating the complaint will provide an initial response within 3 working days of this notification from CC. If we need more time to provide a detailed response, we will indicate this in the initial response, and provide an interim report on the status of our efforts. 负责调查的人将要从 CC 收到通知的 3 个工作日内提供初步回复。如果我们需要进一步的信息, 我们将在初步回复中提出, 并且提供一个关于目前状态的中期报告。

Where complaints relate to a market event article or benchmark report then these will always be escalated to an analyst's line manager. 若投诉涉及市场事件文章或价格报道, 投诉将会被上报给报道者的主管经理。

All substantial complaints will be immediately escalated to higher levels in the organisation (Stage 2). 所有重大投诉都将会被立即上报到上一级管理层。(阶段 2)

A complaint is substantial if concerns a regulatory issue or it impacts, or could impact, the SMM Benchmark reputation or brand.

By the end of Stage 1 the complainant will be provided with a detailed written response to their complaint. 在阶段 1 结束前, 将会提供一个具体的书面回复给投诉者。

This stage will last no more than 7 days. 此阶段不得超过 7 天。

#### Stage 2 阶段 2

Where the complainant is unhappy with the response from SMM and/or when an unresolved complaint is more than 7 days old then the complaint will be escalated to a higher level in the organisation. Typically in the information group this will be to the Senior Manager of information. 若投诉人不同意关于投诉的回复或是任何超过 7 天尚未得到解决的投诉, 该投诉将会被上报给上一级管理层。通常对于信息团队, 投诉将会被上报给高级信息经理

By the end of Stage 2 the complainant will be provided with a detailed written response to their complaint. 在阶段 2 结束前, 将会提供一个具体的书面回复给投诉者。

This stage will last no more than 3 days. 此阶段不得超过 3 天。

#### Stage 3 阶段 3

Where the complainant is unhappy with the response from SMM and/or when an unresolved complaint is more than 10 days old then the complaint will be escalated to higher level (the final level higher than Stage2), typically in the information group this will be to the SMM Benchmark Management Committee. 若投诉人不同意关于投诉的回复或是任何超过 10 天尚未得到解决的投诉, 该投诉将会被上报给公司更高级管理层。通常对于信息团队, 投诉将会被上报给估价总监所在的 SMM 基准管理委员会。

By the end of Stage 3 the complainant will be provided with a detailed written response to their complaint and a final confirmed position. At this time, details will be provided of the 'Further Appeal' mechanism. 在阶段 3 结束前, 将会提供一个具体的书面回复给投诉者并进行最终情况确认。此时, 回复中会提供“进一步上诉”的机制的细节

This stage will last no more than 3 days. 此阶段不得超过 3 天。

All complaints will be treated in the strictest confidence, but in some circumstances, SMM may need to verify details of transactions or trading negotiations with counter-parties. 所有投诉将会被严格保密,但在某些情况下, SMM 可能需要验证具体交易细节或是与相关交易方的交易谈判细节。

We are committed to dealing with complaints quickly, however the period of time required to follow up on complaints can vary on a case-by-case basis. In any case they will be dealt with within the timeframes detailed above. 我们致力于快速处理投诉, 然而所需要的时间根据具体情况而定。

## 6. Action and Response 行动和反馈

Where a complaint relates to a report or publication then, if warranted, a public correction will be issued as soon as is practicable in accordance with the SMM Corrections Policy and the relevant methodologies. 若投诉涉及报告或出版物, 如有必要, 会尽快根据 SMM 的更正政策和相关的方法论 发布一个公开的更正。

Customers and stakeholders should note that SMM Compliance Policies require that the company and its employees will not: 客户和利益相关者应该知晓在 SMM 合规政策要求下, 他们的员工将不能:

- disclose sources of information without the agreement of those sources 在没有签署任何许可协议的情况下披露信息来源。
- disclose information passed to analyst in confidence 披露在承诺保密的前提下得到的信息。
- provide testimony in court or appear as “expert witnesses” 在法庭上提供证词或作为“专家证人”。

Please note too that in accordance with its Corrections Policy, SMM cannot amend published benchmark on the basis of “subsequently received” market information: that is, on the basis of information that was not available to analyst at the time of publication. Corrections are issued only in the event that SMM management finds that a factual, procedural, methodological, typological, or mathematical error has been made by SMM. 同时, 值得注意的是, 根据更正政策, SMM 不能基于“随后收到”的市场信息而更正已公布的价格: 也就是说, 在公布价格前报导者没能得到的信息是不能作为发布更正的理由。只有在 SMM 管理层发现 SMM 在事实, 程序, 方法论, 错别字, 或是数理计算上造成了错误, 更正程序才可以执行。

SMM will consider all well-founded requests for changes to its benchmark reporting methodologies. Where a complaint leads SMM to recognise the need for a review of its methodological approach this will be conducted via the SMM Methodology Consultation Process which allows for consultation with a wide industry cross-section. Methodologies will not be amended purely in response to a single complaint. SMM 将考虑所有的对于价格报道方法论有根据的更改请求。如果该投诉导致 SMM 承认需要对它的估价方法论进行审阅那么将通过 SMM 方法论征询流程进行广泛的行业征询, 方法论并不会由于一个单独投诉而进行修正。

## 7. Inquiries

An inquiry is defined as a request for information in the ordinary course of business regarding methodology, benchmark calculations, market conditions, trade activities, publications, etc. Inquiries also include challenges to assessed benchmarks and requests for a review of the calculation. A Complaint is defined as any expression of dissatisfaction with the services provided

by SMM, oral or written, and whether justified or not. A "Complaint" does not include a question, request for information or request for clarification that is resolved during the normal course of business and does not include a general expression of dissatisfaction without specifics.

Most inquiries can be handled by the recipient and there is no need to record these. Where such an inquiry cannot be resolved during the initial contact then the complainant will be referred to the complaints process. However, any regulatory inquiries should be recorded and referred to the SMM Managing Director who will inform the Chairman of Management Committee

#### 8. Signposting 方针

All SMM staff should be sensitive to a customer's or market participant's wish to complain about the service they receive and should assist them to understand the process for doing so. This includes informing them of the SMM Complaints Process and Policy and its published location. 所有 SMM 员工应该对于客户或是市场参与者关于提供服务的投诉的期望保持敏感，并应该协助他们去了解公司流程。包括告知他们 SMM 投诉流程和政策以及政策在哪儿发布。

#### 9. Filing of documentation 文件归档

Once the complaint is resolved all documentation about the complaint, including a note on the resolution, must be returned to the Customer Care team. Please ensure that the relevant case allocation number is included and the Customer Care team will file the documentation and the documentation will be retained for at least five years. 一旦投诉被解决，所有的投诉相关文件，包括解决方案的记录，要归还给 CC。请确保包含相关案件分配号。CC 将所有的文件归档，并将会保存至少 5 年。

#### 10. Review

Review of the policy is annual by SMM benchmark Management Committee and more frequent as regulatory changes require.