

TILT COMPLAINTS HANDLING POLICY

Agora Intelligence Inc. (d/b/a “Tilt”)

Version 1.0 | February 2026

1. Overview and Scope

This Complaints Handling Policy (the “Policy”) sets forth the procedures by which Agora Intelligence Inc. (d/b/a “Tilt”) (“Tilt”) receives, investigates, and responds to complaints relating to its investment index activities. Tilt is committed to providing services to a high standard and to conducting its business with integrity. This Policy provides a mechanism by which existing and potential clients and other stakeholders may submit complaints arising in connection with the activities of Tilt’s index business.

For purposes of this Policy, a “complaint” is any written or verbal expression of dissatisfaction received by Tilt relating to the provision of, or failure to provide, services delivered by the Tilt index business, where the complainant alleges that they have suffered or may suffer:

- Financial loss;
- Material distress; and/or
- Material inconvenience.

Complaints may generally pertain to, but are not limited to:

- Whether a specific index determination is representative of market value;
- A proposed or completed change to an index methodology;
- The application of a methodology in relation to a specific index determination; and
- Other decisions pertaining to the index determination process.

Any expression of dissatisfaction that is unclear as to whether it qualifies as a complaint under this Policy shall be escalated to the appropriate compliance or governance personnel for review and determination. Expressions of dissatisfaction that are determined not to constitute a complaint under this Policy will be addressed through Tilt’s standard client communication processes.

This Policy covers index complaints only. For general inquiries about Tilt’s indexes, please contact Tilt at governance@tilt.io.

This Policy is designed to be consistent with the IOSCO Principles for Financial Benchmarks.

2. Submission of Complaints

Complaints may be submitted by email to governance@tilt.io. All complaints should include sufficient detail to permit review and investigation, including:

- The name of the individual submitting the complaint on behalf of the associated client or organization;
- The legal entity name of the associated client or organization, if applicable;
- Preferred contact details of the complainant;

- The name of any relevant index; and
- A sufficiently detailed description of the facts and circumstances giving rise to the complaint, including a timeline of associated events.

Where insufficient information is provided, Tilt may be unable to adequately investigate the complaint and may request further information from the complainant or related parties. Tilt will endeavor to process any personally identifiable information linked to a complaint in accordance with applicable privacy legislation and Tilt's privacy policies.

3. Investigation of Complaints

Tilt has established procedures to process, investigate, and communicate complaints in a timely and fair manner:

1. Tilt will make reasonable efforts to issue a written acknowledgment to the complainant promptly upon receipt of a complaint.
2. Complaints will be reviewed by appropriate personnel. Any person directly involved in the subject matter of a complaint shall be recused from the review process.
3. The complaint will be escalated as appropriate within Tilt's governance structure, depending on the nature and subject matter of the complaint.
4. If a material change to an Index is warranted as a result of the investigation, any such change will be handled in accordance with the Tilt Index Methodology Change Policy.
5. Tilt will determine whether it considers the complaint to be upheld and, in the affirmative case, will determine what remedial action is appropriate.
6. Tilt will communicate the outcome of the investigation to the complainant in writing within a reasonable period, unless such communication would be contrary to applicable law or public policy.
7. A complainant who is dissatisfied with the response received may request a review by the Tilt Index Oversight Committee ("TIOC Oversight"). TIOC Oversight will conclude its review and issue a final response to the complainant.

4. Recordkeeping

All complaints and related responses are documented and retained in accordance with Tilt's record retention policies.

5. Approval and Review

This Policy is reviewed by appropriate governance or compliance personnel at least annually or as required if there are any material changes to applicable law or regulation. TIOC Oversight is responsible for approving this Policy and any subsequent amendments.