

Disclosure on managing Conflict of Interest

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1. ESGRisk.ai has operationally separated its analytical team to avoid conflict of interest.
2. The assessment is carried out by a separate team of personnel comprising analysts who are not in any way involved in business development and procurement.
3. ESGRisk.ai discloses the general nature of its compensation arrangements with the rated companies.
4. ESGRisk.ai 's access person(s) and/or employee(s) who participates in a rating action with respect to an entity would not be compensated or evaluated based on the amount of revenue that ESGRisk.ai would derive from that entity.
5. The compensation paid to members of the analytical team is not dependent on the assessment outcome or fee received from the entities. This ensures that business pressures do not, in any manner, influence the teams involved in the assignment.
6. ESGRisk.ai may review, where the compliance officer finds it so necessary, the past work of an analyst who leaves the employment of ESGRisk.ai and joins an entity (if ESGRisk.ai comes to know of its former employee taking up such an employment) where ESGRisk.ai has an outstanding rating and the concerned analyst had participated in the rating exercise of that entity.
7. The access person(s) and/or employee(s) has the responsibility to make reasonable efforts to inform and disclose to ESGRisk.ai at the earliest of situation(s) and/or circumstances that may potentially or actually cause or be perceived to cause a conflict of interest in the discharge of his/her duties and obligations.
8. This policy is complementary to the gift policy, and rules for ESGRisk.ai 's analytic firewalls which are currently in force and/or that may be adopted by ESGRisk.ai from time to time.
