

## **Confidentiality Policy**

## Last Reviewed On: March 01, 2025 Version 2.0

- 1. The objective of this policy is to protect public and/or confidential and/or material non-public information including confidential information present or in future aggregated at ESGRisk.ai. Any information, regardless of the form or format, that is not 'public information' but is made available to ESGRisk.ai is subject to 'Confidentiality Policy' and therefore will be kept confidential.
  - 2. The term 'public information' means any information, regardless of form or format, that an entity discloses, disseminates, or makes available to the general public.
  - 3. ESGRisk.ai only uses publicly available information for its rating assessment. Any confidential or non-public information provided to us in any form will not be used for assessment or any other purposes.
  - 4. With respect to confidential information received from any company, in any situation, ESGRisk.ai and its access persons and employees:
    - a. Are prohibited from using or disclosing such information
    - b. Shall take reasonable steps to protect such information from fraud, theft, misuse, or inadvertent disclosure.
    - c. Are not allowed to use such information for personal gain
  - 5. ESGRisk.ai and its access persons and employees are prohibited from selectively disclosing information about an unpublished ESG rating action
  - 6. Notwithstanding the above, ESGRisk.ai and its access persons and employees reserve the right to disclose confidential/material non-public information, in their possession, to the Regulatory / Statutory authorities such as Securities and Exchange Board of India (SEBI), Reserve Bank of India (RBI) / Government, including, but not limited to, a Court of Law, when required to do so under any applicable law or regulation.
  - 7. Any suspected or actual breach of confidentiality, including unauthorized disclosure or misuse of confidential information, must be immediately reported to the Compliance Officer.
  - 8. The Compliance Officer shall take immediate action, investigate the breach, and implement appropriate corrective measures to mitigate any potential risks.
  - 9. This policy is location agnostic and applicable to access persons and employees whether working from office or remotely (such as working from home).
  - 10. This policy is complementary to the Analytic Firewall Rules and the Policy on



Outsourcing of Activities policy currently in force and / or that may be adopted by ESGRisk.ai from time to time.