

## Sustainable Fitch: Self-Attestation Checklist Singapore Code of Conduct for ESG Rating and Data Product Providers

Date: 24 January 2025

Name of Provider (Please indicate)	<b>Sustainable Fitch*</b> <i>**Sustainable Fitch* refers to Sustainable Fitch Inc. and each of its affiliates that provide ESG products under the trade name "Sustainable Fitch".</i>
Type of Provider (Please select one)	<input type="checkbox"/> ESG Rating and Data Product Provider <input checked="" type="checkbox"/> ESG Rating Provider <input type="checkbox"/> ESG Data Product Provider
Company Name of the Independent External Assessor	Not Applicable
Date of Assessment	Not Applicable
Remarks by Assessor, if any	Not Applicable

Sustainable Fitch was established by the Fitch Group in 2021 and launched its Environmental, Social and Governance (ESG) product suite in September 2022. It offers a range of products that evaluate and/or opine on the ESG qualities of entities and/or financial instruments. Sustainable Fitch's ESG products include: ESG Ratings, (i.e. ESG Entity Ratings, ESG Framework Ratings and ESG Instrument Ratings), ESG Scores and Second-Party Opinions (SPOs). This attestation is in relation to these ESG analytical products.

For ESG Ratings and ESG Scores, when assessing environmental alignment and impact, our methodologies generally refer to science-based taxonomies and, for social issues, the social aspects of the UN Sustainable Development Goals (SDGs). Point-in-time SPOs are produced prior to an instrument's issuance and provide the market with opinions on instruments' impact and alignment with relevant environmental and social principles, guidelines and/or taxonomies.

Sustainable Fitch does not issue credit ratings. Sustainable Fitch's ESG products are independent of credit ratings or any effect that ESG factors may have on the credit profile of the entity or debt instrument.

### Best Practice 1

Best Practice 1:	Complied?			If Yes, please disclose how this is complied with. E.g. provide links to relevant disclosures. If No, please explain. E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.
	Y	N	NA	
1. The ESG Rating and Data Product Provider should:				
a. adopt and implement written policies and procedures to ensure that the ESG rating and data products that it prepares are based on a thorough analysis of all relevant information available to it;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sustainable Fitch has policies and procedures designed to help ensure that each ESG product is assigned according to a published methodology which discloses in a modular manner the areas evaluated for the ESG Ratings and ESG Scores, including the level of contribution of each towards the final assessment. The SPO methodology considers alignment to internationally accepted principles and guidelines, as well as taxonomies. The methodologies published on Sustainable Fitch's website are:



				<a href="#">ESG Rating Methodology</a> <a href="#">ESG Score Methodology</a> <a href="#">Second-Party Opinion Methodology</a>  A description of Sustainable Fitch's procedures can be found here: <a href="#">Sustainable Fitch Procedures for Analytical Products</a>
b. adopt, implement and provide transparency around the methodologies for its ESG rating and data products that are rigorous, systematic, applied continuously, while maintaining a balance with respect to proprietary or confidential aspects of the methodologies;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 1.a.
c. for an ESG rating, conduct and publish on a regular basis, an evaluation of its methodologies against the outputs which they have been used to produce;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sustainable Fitch evaluates and updates the scoring guidelines for sub-factors used by analysts in the application of its methodologies on an ongoing basis to reflect feedback from analysts and facilitate consistent application. The weightings of each broad area and sub-factor have been established based upon the identification of metrics that are considered by Sustainable Fitch as indicative of the willingness of an entity to achieve environmental and social impacts, scenario testing on weightings and qualitative feedback from market participants.
d. subject the ESG rating and data products methodologies (including data sources) to regular review, and disclose sufficient information (including any material updates) made to the methodologies as well as its views on the potential impact of these changes to the ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See response in 1.c.
e. provide transparency, where reasonably possible, around the sources of data used in determining ESG rating and data products, including the use of any industry averages, estimations or other methodologies when actual data is accessible to it. This may include transparency around the timeliness of data used, the time period of the data used, as well as whether the data is publicly sourced or proprietary in nature, including through approximations;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>SUF gathers relevant issuer-specific information from public sources, including financial, issuance or ESG information on the issuer's website. All analytically relevant documents, both public and private, are stored internally, with non-public information tagged appropriately so as not to breach confidentiality policies.</p> <p>If sufficient public information is not available, to proceed with the analytical process, Sustainable Fitch may request that the issuer provide relevant information and proceed with the analytical process only if sufficient information is made available.</p> <p>A description of Sustainable Fitch policies and procedures, which also contains the sources of data and information, can be found here:  <a href="#">Sustainable Fitch Procedures for Analytical Products</a></p>
f. monitor on an ongoing basis, and regularly update the ESG rating and data products, except where specifically disclosed that the ESG rating is a point in time rating by - reviewing, on a regular basis, the ESG rating of the rated entity;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ESG Analytical Products are monitored and updated, as needed. ESG Ratings and ÇESG Scores are monitored, whereas SPOs and EU Green Bond Assessments are point-in-time.



(Singapore) initiating a review of the ESG rating upon becoming aware of any public information that may reasonably be expected to result in a revision or termination of the ESG rating, consistent with the rating methodology; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 1.c. and 1.f.
(Singapore) updating on a timely basis the ESG rating, as appropriate, based on the results of such review;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 1.c and 1.f.
g. maintain records to support every ESG rating and data products that it issues;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sustainable Fitch's File Maintenance Policy Establishes guidelines for the management, maintenance and orderly disposition of analytical records relating to the assignment of ESG Analytical Products and the policies, procedures, criteria and methodologies.
(Singapore) Such records can be kept for at least 6 years from the issue date of the relevant ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 1g. Sustainable Fitch also adheres to regulatory specification of file maintenance.
h. ensure that relevant personnel involved in preparing and deliberation of the ESG rating and data products are, professional, competent and persons of integrity;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The employees of Sustainable Fitch have the necessary skills, knowledge, qualifications, and background to help achieve quality and consistency in its ESG products. In addition to providing a comprehensive onboarding process to new analysts, Sustainable Fitch provides ongoing internal and external training throughout its analysts' professional careers and provides analysts with the resources to seek external professional qualifications. The team is extensively trained on methodology, the rating process and compliance issues, providing for a common level of knowledge among the analytical team.
(Singapore) ensure that relevant personnel involved in preparing and deliberation of the ESG rating and data products are, individually or collectively where relevant, (for example when there are rating committees) professional, competent and persons of integrity;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 1.h.
i. ensure that it has adequate resources to produce high-quality ESG rating and data products of the covered entity, including sufficient personnel and technological capabilities, to seek out information it needs in order to make an assessment, analyse all information relevant to its decision-making processes, and provide quality assurance (e.g. verification of data);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 1.h. Sustainable Fitch has its own workflow platform.
(Singapore) For an ESG rating, when deciding whether to rate or continue rating a rated entity, the ESG Rating Provider should assess whether it is able to devote sufficient personnel with the necessary skill sets to make a proper ESG rating assessment, and whether its personnel will likely have access to sufficient information needed in order to produce the ESG rating. It should adopt reasonable measures so that the information it uses in assigning an ESG rating is of sufficient quality to support a credible ESG rating. The ESG rating should also be based on publicly disclosed data sources, and other information sources where necessary, using transparent and defined methodologies. If the ESG rating is based on limited	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The guidelines are included in: <a href="#">Sustainable Fitch Procedures for Analytical Products</a>

data, it should make clear, in a prominent place, the limitations of the ESG rating;				
j. consider offering ESG rating and data products to clients in a machine-readable format;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In addition to providing a report with Sustainable Fitch's assessments, the data from issuers used in the analysis is also available in a machine-readable format.
k. (Singapore) for an ESG rating, the ESG Rating Provider and its personnel should not, either implicitly or explicitly, give any assurance or guarantee of any particular ESG rating prior to the ESG rating assessment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sustainable Fitch does not implicitly or explicitly give any assurance or guarantee. See: <a href="#">BULLETIN 7: RESTRICTION ON PROVIDING ADVICE</a> and <a href="#">BULLETIN 1: SEGREGATION OF COMMERCIAL &amp; ESG PRODUCT ACTIVITIES POLICY</a> .

## Best Practice 2

Best Practice 2:	Complied?			If Yes, please disclose how this is complied with. E.g. provide links to relevant disclosures. If No, please explain. E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.																
	Y	N	NA																	
2. The ESG Rating and Data Product Provider should:																				
a. adopt written policies, procedures and mechanisms designed to (i) identify, and (ii) eliminate, or manage, mitigate and disclose, as appropriate, any actual or potential conflicts of interest related to its ESG rating and data products that may influence the opinions and analyses it makes or the judgment and analyses of the personnel it employs who have an influence on its decisions on the ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Sustainable Fitch has policies and procedures designed to identify, eliminate or manage, and disclose in a transparent manner, any potential conflicts of interest. The relevant bulletins to which all Sustainable Fitch employees are subjected to, including the hyperlinks to the Sustainable Fitch website, are:</p> <p><b>SUSTAINABLE FITCH – SPECIFIC BULLETINS</b></p> <table border="1"> <thead> <tr> <th>BULLETIN</th> <th>Overview</th> </tr> </thead> <tbody> <tr> <td><a href="#">FITCH GROUP BULLETIN 6: EMPLOYEE CODE OF CONDUCT</a></td> <td>Sets forth business ethics guidelines that specify the ethical and legal conduct expected of Fitch Group employees in a variety of identified business situations.</td> </tr> <tr> <td><a href="#">BULLETIN 1: SEGREGATION OF COMMERCIAL &amp; ESG PRODUCT ACTIVITIES POLICY</a></td> <td>Sets forth the requirements regarding the segregation of commercial and ESG Analytical Product Activities and manages potential conflicts of interest.</td> </tr> <tr> <td><a href="#">BULLETIN 2: ESG SECURITIES TRADING &amp; CONFLICTS OF INTEREST POLICY</a></td> <td>Addresses securities trading and other potential conflicts of interest between Sustainable Fitch and its employees. It contains prohibitions, restrictions and disclosure requirements applicable to employees that help identify and manage these potential conflicts.</td> </tr> <tr> <td><a href="#">BULLETIN 3: CONFIDENTIAL INFORMATION POLICY</a></td> <td>Sets forth those requirements applicable to Sustainable Fitch Analysts regarding the protection and permissible dissemination of Confidential Information, including Material Non-Public Information (MNPI) and Confidential Analytical Information.</td> </tr> <tr> <td><a href="#">BULLETIN 4: COMPLAINT HANDLING POLICY</a></td> <td>Outlines procedures for the receipt, retention and treatment of (i) complaints regarding ESG Analytical Products, models and methodologies and compliance with applicable laws and policies and procedures, and (ii) confidential, anonymous complaints by employees or users of ESG Analytical Products.</td> </tr> <tr> <td><a href="#">BULLETIN 6: FIREWALL POLICY</a></td> <td>Manages potential conflicts of interest regarding Sustainable Fitch's assignment (both pending and actual) or maintenance of ESG Analytical Products on certain affiliated entities.</td> </tr> <tr> <td><a href="#">BULLETIN 7: RESTRICTION ON PROVIDING ADVICE</a></td> <td>Prevents Sustainable Fitch from providing advisory or consulting services to any ESG Rated Entity or related parties.</td> </tr> </tbody> </table>	BULLETIN	Overview	<a href="#">FITCH GROUP BULLETIN 6: EMPLOYEE CODE OF CONDUCT</a>	Sets forth business ethics guidelines that specify the ethical and legal conduct expected of Fitch Group employees in a variety of identified business situations.	<a href="#">BULLETIN 1: SEGREGATION OF COMMERCIAL &amp; ESG PRODUCT ACTIVITIES POLICY</a>	Sets forth the requirements regarding the segregation of commercial and ESG Analytical Product Activities and manages potential conflicts of interest.	<a href="#">BULLETIN 2: ESG SECURITIES TRADING &amp; CONFLICTS OF INTEREST POLICY</a>	Addresses securities trading and other potential conflicts of interest between Sustainable Fitch and its employees. It contains prohibitions, restrictions and disclosure requirements applicable to employees that help identify and manage these potential conflicts.	<a href="#">BULLETIN 3: CONFIDENTIAL INFORMATION POLICY</a>	Sets forth those requirements applicable to Sustainable Fitch Analysts regarding the protection and permissible dissemination of Confidential Information, including Material Non-Public Information (MNPI) and Confidential Analytical Information.	<a href="#">BULLETIN 4: COMPLAINT HANDLING POLICY</a>	Outlines procedures for the receipt, retention and treatment of (i) complaints regarding ESG Analytical Products, models and methodologies and compliance with applicable laws and policies and procedures, and (ii) confidential, anonymous complaints by employees or users of ESG Analytical Products.	<a href="#">BULLETIN 6: FIREWALL POLICY</a>	Manages potential conflicts of interest regarding Sustainable Fitch's assignment (both pending and actual) or maintenance of ESG Analytical Products on certain affiliated entities.	<a href="#">BULLETIN 7: RESTRICTION ON PROVIDING ADVICE</a>	Prevents Sustainable Fitch from providing advisory or consulting services to any ESG Rated Entity or related parties.
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(Singapore) Accordingly, for an ESG rating, it should adopt written policies, procedures and mechanisms designed to identify, manage, mitigate and disclose conflicts of interest between ESG rating services and other business lines which can reasonably be considered to give rise to actual or perceived conflicts of interest (e.g. ESG consulting or advisory businesses);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The bulletins highlighted in 2.a. explain how Sustainable Fitch attempts to mitigate conflicts of interest. This point is covered by Sustainable Fitch Bulletin 1 (Segregation of Commercial and ESG Product Activity Policy) and Bulletin 6 (Firewall Policy).
b. disclose its conflicts identification and management measures;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This point is covered by Sustainable Fitch Bulletin 1 (Segregation of Commercial and ESG Product Activity Policy), Bulletin 2 (ESG Securities Trading & Conflicts of Interest Policy) and Bulletin 6 (Firewall Policy).
c. take steps that are designed to ensure its ESG rating and data products would not be influenced by the existence of or potential for a business relationship between it (or its affiliates) and any entity or any other party for which it provides ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 2.b above
d. put in place measures to help ensure its personnel refrain from any securities or derivatives trading presenting inherent conflicts of interest with its ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This point is covered by Sustainable Fitch Bulletin 2 (ESG Securities Trading & Conflicts of Interest Policy)
e. structure reporting lines for its personnel and their compensation arrangements to eliminate or appropriately manage actual and potential conflicts of interest related to its ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fitch Group Bulletin 6: Employee Code of Conduct
f. not compensate or evaluate an individual research or analytical employee/agent on the basis of the amount of revenue derived from an entity that such employee/agent provides ESG rating and data products for, or with which such employee/agent regularly interacts regarding such ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fitch Group Bulletin 6: Employee Code of Conduct
g. where consistent with confidentiality, contractual and other business, legal and regulatory requirements, disclose the nature of the compensation arrangement or any other business or financial relationships that exist with an entity for which it provides ESG rating and data products.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b><u><a href="#">BULLETIN 1: SEREGATION OF COMMERCIAL &amp; ESG PRODUCT ACTIVITIES POLICY</a></u></b></p> <p>When assigning an ESG Analytical Product and/or taking an ESG Product Action, Sustainable Fitch may only consider those factors relevant to the Environmental, Social and Governance qualities of a Sustainable Fitch Coverage Entity or a Security. In particular, ESG Analytical Products assigned to a Sustainable Fitch Coverage Entity or Security must not be affected by whether there is an existing or potential business relationship between Fitch Group (or its affiliates) and the Sustainable Fitch Coverage Entity or any other third party.</p> <p>The fact that ESG Analysts are aware generally that Sustainable Fitch receives compensation for its analytical work does not mean that ESG Analysts are influenced by business considerations.</p>
(Singapore) For an ESG rating that is prepared on an issuer-paid basis, the ESG Rating Provider should not enter into any contingent fee arrangement for	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 2.g.



providing ESG rating services. For the purpose of this paragraph, a contingent fee is a fee where the amount of which is determined by reference to the outcome of a transaction or the result of services provided by the ESG Rating Provider.				
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**Best Practice 3**

Best Practice 3:	Complied?			If Yes, please disclose how this is complied with. E.g. provide links to relevant disclosures. If No, please explain. E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.
3. The ESG Rating and Data Product Provider should:	Y	N	NA	
a. identify, avoid or appropriately manage, mitigate and disclose potential conflicts of interest that may compromise the independence and objectivity of its operations;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This point is covered by Sustainable Fitch Bulletin 1 ( <a href="#">Segregation of Commercial and ESG Product Activity Policy</a> ), Bulletin 2 ( <a href="#">ESG Securities Trading &amp; Conflicts of Interest Policy</a> ) and Bulletin 6 ( <a href="#">Firewall Policy</a> ).

**Best Practice 4**

Best Practice 4:	Complied?			If Yes, please disclose how this is complied with. E.g. provide links to relevant disclosures. If No, please explain. E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.
4. The ESG Rating and Data Product Provider should:	Y	N	NA	
a. make adequate levels of public disclosure and transparency a priority for its ESG rating and data products, subject to commercial sensitivity considerations;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sustainable Fitch has policies and procedures designed to ensure that its ESG products reflect the ESG characteristics of the entity and/or debt instruments according to the applicable methodology. Each ESG product is assigned according to a published methodology which discloses the areas evaluated for the ESG Ratings and ESG Scores in a modular manner, including the level of contribution of each towards the final assessment. The SPO methodology considers alignment to internationally accepted principles and guidelines, as well as taxonomies. Bulletin 3: Confidential Information Policy also applies here. The methodologies published on Sustainable Fitch's website are: <a href="#">ESG Rating Methodology</a> , <a href="#">ESG Score Methodology</a> , <a href="#">Second-Party Opinion Methodology</a> . A description of Sustainable Fitch policies and procedures can be found here: <a href="#">Sustainable Fitch Procedures for Analytical Products</a>
b. clearly label its ESG rating and data products to enable the user to understand the ESG rating's or ESG	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.



data product's intended purpose including its measurement objective;				
c. make adequate levels of public disclosure, where reasonably possible, around the sources of data (e.g. publicly or privately sourced data or information) it relies on in offering ESG rating and data products, including the use of industry averages, estimations or other methodologies when actual data is not available (e.g. unavailability of publicly reported data if it is used for the product);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
d. make adequate levels of public disclosures on procedures and methodologies underlying its ESG rating and data products to enable the users of these products to understand how their outputs were determined;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
e. make adequate levels of public disclosure on ESG rating and data products methodologies that include, but not limited to:				
· the measurement objective of the ESG rating and data products;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
· the criteria used to assess the covered entity;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
· the Key Performance Indicators used to assess the covered entity against each criterion;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
· the relative weighting of these criteria to that assessment;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
· the scope of business activities and group entities included in the assessment;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
· the principal sources of qualitative and quantitative information used in the assessment as well as information on how the absence of information was treated;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
· the time horizon of the assessment;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
· the meaning of each assessment category (where relevant);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
(Singapore) the measurement objective of the ESG rating and data products (e.g. measuring impact of the covered entity on the external environment and society, and/or measuring risk exposure and resilience of the covered entity to physical and transition ESG risks);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.
(Singapore) the Key Performance Indicators used to assess the covered entity against each criterion (e.g. thresholds used to measure the ESG impacts and/or ESG risks, and related mitigation and adaptation measures), including the use of forward-looking strategic plans and targets of the covered entity in the assessment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4.a.



**Best Practice 5**

Best Practice 5:	Complied?			If Yes, please disclose how this is complied with. E.g. provide links to relevant disclosures. If No, please explain. E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.
5. The ESG Rating and Data Product Provider should:	Y	N	NA	
<p>a. adopt and implement written policies, procedures and mechanisms related to its ESG rating and data products, designed to address and protect the non-public nature of information which is shared with it by entities under the terms of a confidentiality agreement or otherwise, under a mutual understanding that the information is shared confidentially;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Sustainable Fitch's Confidential Information Policy sets forth those requirements applicable to Sustainable Fitch Analysts regarding the protection and permissible dissemination of Confidential Information, including Material Non-Public Information (MNPI) and Confidential Analytical Information. <a href="#">BULLETIN 3: CONFIDENTIAL INFORMATION POLICY</a></p> <p>A description of Sustainable Fitch policies and procedures can be found here: <a href="#">Sustainable Fitch Procedures for Analytical Products</a></p>
<p>(Singapore) For an ESG rating, unless otherwise permitted by the confidentiality agreement and consistent with applicable law and regulations, the ESG Rating Provider and its personnel should not disclose non-public information in press releases, through research conferences, to future employers, or in conversations with investors, other issuers, other persons, or otherwise;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See: 5.a.
<p>b. adopt and implement written policies and procedures designed to address the use of non-public information only for purposes related to its ESG rating and data products or otherwise in accordance with its confidentiality arrangements with the entity;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See: 5.a.
<p>c. include information on data confidentiality management and on the protection of non-public information to the extent terms of engagement are published;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See: 5.a.
<p>(Singapore) For an ESG rating prepared on an issuer-paid basis, the ESG Rating Provider should ensure that its personnel do not selectively disclose any information that are not publicly available about the ESG rating or possible future issues or revisions of any ESG rating by it, except to the issuer of the capital markets products or its designated agents.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See: 5.a.



### Best Practice 6

Best Practice 6:	Complied?			If Yes, please disclose how this is complied with. E.g. provide links to relevant disclosures. If No, please explain. E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.
6. Where the ESG Rating and Data Product Provider collects information from covered entity on a bilateral basis, or through questionnaires, it should consider:	Y	N	NA	
a. communicating sufficiently in advance when it expects to request information for the purposes of preparing the ESG rating and data products; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sustainable Fitch does not conduct surveys, instead analysts first try to obtain the information from public sources and, ultimately, would interact with the issuer. See <a href="#">Sustainable Fitch Procedures for Analytical Products</a>
b. including in its requests, pre-inputted information either from publicly available sources or from the covered entity's previous submissions, where reasonably possible, for the covered entity's review or confirmation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sustainable Fitch does not conduct surveys, instead analysts first try to obtain the information from public sources and, ultimately, would interact with the issuer. See <a href="#">Sustainable Fitch Procedures for Analytical Products</a>

### Best Practice 7

Best Practice 7:	Complied?			If Yes, please disclose how this is complied with. E.g. provide links to relevant disclosures. If No, please explain. E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.
7. The ESG Rating and Data Product Provider should:	Y	N	NA	
a. provide a clear and consistent contact point with whom the covered entity can interact to address any queries relating to the assessment provided by the ESG Rating and Data Product Provider;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See <a href="#">Sustainable Fitch Procedures for Analytical Products</a> Questions can also be sent to <a href="mailto:reporting@sustainablefitch.com">reporting@sustainablefitch.com</a>
b. expeditiously inform the covered entity of the principal grounds on which the: i. ESG rating is based, before or after the publication of the ESG rating; and ii. ESG data product is based, before or after the publication of the ESG data product, where practicable;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See <a href="#">Sustainable Fitch Procedures for Analytical Products</a> Questions can also be sent to <a href="mailto:reporting@sustainablefitch.com">reporting@sustainablefitch.com</a>
c. allow the covered entity time to draw attention to any factual errors, including the data and information underlying the: i. ESG rating; and ii. ESG data product, where practicable;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See <a href="#">Sustainable Fitch Procedures for Analytical Products</a> Questions can also be sent to <a href="mailto:reporting@sustainablefitch.com">reporting@sustainablefitch.com</a>
d. publish terms of engagement describing how and when it will typically engage with the covered entity, including when information is likely to be requested and the opportunities available to the covered entity for review.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See <a href="#">Sustainable Fitch Procedures for Analytical Products</a> Questions can also be sent to <a href="mailto:reporting@sustainablefitch.com">reporting@sustainablefitch.com</a>

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