

IiAS SUSTAIN POLICY AND PROCESS: MANAGING CONFLICT OF INTEREST

PURPOSE

IiAS Sustain is a SEBI-registered Category II ESG Rating Provider and operates on a 'subscriber-pays' model. IiAS Sustain has a responsibility to ensure that it preserves the integrity of its research, its objective and the public's trust. IiAS Sustain and its employees conduct their relationships with outside organizations with objectivity and honesty. The purpose of this policy is to prevent and mitigate conflicts of interest, or even the appearance of a conflict of interest or impropriety resulting from other business activities undertaken by IiAS Sustain – specifically for its ESG rating services.

POTENTIAL AREAS OF EXTERNAL CONFLICT OF INTEREST

A potential conflict of interest may arise under the following circumstances:

1. IiAS Sustain provides ESG rating services and operates on a 'subscriber-pays' model. However, its parent company Institutional Investor Advisory Services India Limited ('IiAS') provides voting advisory services to investors on shareholder resolutions presented by rated entities, where the rated entity could be an IiAS customer.
2. IiAS Sustain provides ESG ratings to listed companies that are IiAS' shareholders. The list of IiAS' shareholders can be accessed here: <https://www.iiasadvisory.com/about>.
3. IiAS Sustain's or IiAS' directors or leadership team, from time to time, can be board members of companies on which IiAS Sustain provides ESG ratings.

There is no conflict of interest under the following circumstances:

1. As a general practice, IiAS holds one share in listed companies (subject to corporate actions such as share splits, bonus, etc.) with the objective of receiving timely shareholder communication from companies. A list of IiAS' shareholding in companies can be accessed here: <http://iias.in/Disclosures.aspx>. Since IiAS Sustain or IiAS does not hold a material interest in any listed company, such holding does not constitute a conflict of interest.
2. The subscribers to IiAS Sustain's ratings, including mutual funds and insurance companies, shall not be regarded as an 'issuer' for the purposes of the ESG Rating Provider regulations under the Securities and Exchange Board of India (Credit Rating Agencies) Regulations, 1999.

POTENTIAL AREAS OF INTERNAL CONFLICT OF INTEREST

- A research analyst or his/her immediate dependent relative¹ owns any financial interest in the rated entity.
- A personal, family or financial interest of the research analyst could unduly influence the objectivity of the analysis being undertaken.

¹"Immediate dependent relative" means: (a) Father (including stepfather); (b) Mother (including stepmother); (c) Spouse; (d) Brother; (e) Sister; (f) Son; (g) Daughter; (h) Son's wife; (i) Daughter's husband; who is financially dependent on any person employed as research analyst | "Financially dependent" means a relative to whom one contributes all or a major amount of necessary financial support.

STRUCTURAL MECHANISMS TO MITIGATE CONFLICT OF INTEREST RISKS

- IiAS Sustain's rating process is based on IiAS Sustain's [Rating Methodology](#). These guidelines provide the contours within which IiAS Sustain will provide ESG ratings to companies. In case of deviation from IiAS Sustain's rating methodology, the deviation and the reason for such deviation is explained in the ESG rating report.
- To ensure that its voting recommendations are objective and unbiased, IiAS Sustain uses data, wherever possible, to establish and substantiate its point of view.

OTHER RESTRICTIONS THAT ARE OR MAY BE IMPOSED

- In case of any actual or potential conflict of interest, research analysts must abstain from participating in the ESG rating process.
- Other measures, as deemed necessary in case-specific instances, will be undertaken to mitigate the risk of conflict of interest.

DISCLOSURES OF CONFLICTS OF INTEREST

Adequate disclosures, wherever deemed necessary, form a part of IiAS Sustain's ESG rating report.

ABOUT THE POLICY

- This policy is effective from 11 Nov 2025 and remains valid unless amended.
- There are no prior versions / revisions of this policy.