

## Annex 2

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### Self-attestation Document

Name of ESG ratings / data products provider: Institutional Shareholder Services Inc. (ISS); ISS STOXX Sustainability

Please indicate if the provider engages in the provision of (check all relevant boxes):

ESG ratings/scores

ESG data products

Date: 01/12/2025

ISS submits this Self-attestation Document in response to this Code of Conduct as well as a [consolidated adherence statement](#) for Global Codes of Conduct for ESG ratings and data products providers which can be found on ISS' [Due Diligence website](#).

Notes:

1. This is the Self-attestation Document referred to in paragraph 2.3 of the Code of Conduct for ESG Ratings and Data Products Providers (“Code of Conduct”) developed by the Hong Kong Environmental, Social and Governance Ratings and Data Products Providers Voluntary Code of Conduct Working Group.
2. When completing this document, providers:
  - should include hyperlinks to relevant policies and documents where relevant; and
  - may consider clarifying where appropriate the extent to which:
    1. application of a principle is affected by existing regulatory obligations or other constraints to which the provider is subject; and
    2. a principle is not considered to be applicable or relevant to any ESG ratings and data products offered by the provider; and
  - may make reference to their adherence to any relevant voluntary code or regulatory requirements of other jurisdiction(s) and explain how such adherence may also satisfy the equivalent expectation(s) in the Code of Conduct.
3. Please refer to the Code of Conduct for a more detailed description of the context and outcomes relevant to each principle set out in this document.

CODE OF CONDUCT REFERENCE	PRINCIPLES AND ACTIONS	HOW HAS THE PRINCIPLE/ ACTION BEEN IMPLEMENTED?
<b>1. Principle on Good Governance</b>		
1.1	ESG ratings and data products providers should ensure appropriate governance arrangements are in place that enable them to promote and uphold the Principles and overall objectives of the Code of Conduct.	<p>ISS is committed to good governance best practices, evidenced through policies and practices designed to ensure independent, timely, accurate, and insightful research and data analytics.</p> <p>Please refer to ISS' consolidated statement, specifically Principle One (Good Governance), for more information.</p>
<b>Actions</b>		
ESG ratings and data products providers should have appropriate governance arrangements in place that:		
1.4	(A) include a clear organisational structure with well-defined, transparent and consistent roles and responsibilities for personnel involved in the determination, publication, or oversight, as appropriate, of an ESG rating or of an ESG data product; and which	<p>ISS has a clearly defined organizational structure with transparent and consistent roles and responsibilities for the human resources involved in the assessment, publication, and oversight of ESG ratings and data products (see Principle Two for more detail), who are also aided by ISS' technological capabilities and supporting functions in the wider organization.</p> <p>Please refer to ISS' consolidated statement, specifically Principle One (Good Governance) and Principle Two (Securing Quality) for more information.</p>
1.5	(B) enable them to follow the Principles set out in this Code of Conduct.	<p>ISS' practices demonstrate adherence to the Principles and overall guidelines set out in this Code of Conduct, the International Organization of Securities Commissions' ("IOSCO") Recommendations for Environmental, Social and Governance (ESG) Ratings and Data Products Providers (the "IOSCO Recommendations"), and other Global Codes of Conduct which are closely aligned with the IOSCO Recommendations, and apply to the ESG ratings and data products and international market set out in the Recommendations:</p> <ul style="list-style-type: none"> <li>• Japan: the Financial Services Agency of Japan's ("FSA" or "JFSA") Code of Conduct for ESG Evaluation and Data Providers – December 2022 (the "JFSA Code") which applies to ESG evaluation</li> </ul>

		<p>and data products and leverages the IOSCO Recommendations</p> <ul style="list-style-type: none"> <li>• Singapore: the Singapore Code of Conduct for ESG Rating and Data Product Providers – December 2023 (the “MAS Code”), developed by the Monetary Authority of Singapore, which applies to ESG ratings and data products and leverages IOSCO’s recommendations for good sustainable finance practices</li> <li>• UK: the International Capital Markets Association’s Code of Conduct for ESG Ratings and Data Products Providers – December 2023 (the “ICMA UK Code”), commissioned by the Financial Conduct Authority (FCA), which applies to ESG ratings and data products and leverages the IOSCO Recommendations</li> <li>• Hong Kong: the Hong Kong Code of Conduct for ESG Ratings and Data Products Providers – October 2024, (the “ICMA HK Code”), sponsored by the Hong Kong Securities and Futures Commission (SFC) which applies to ESG ratings and data products and leverages the IOSCO Recommendations</li> </ul> <p>In light of this, we submit this checklist in response to the ICMA HK Code as well as a consolidated adherence statement for Global Codes of Conduct for ESG ratings and data products providers which can be found on ISS’ <a href="#">Due Diligence website</a>.</p>
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**2. Principle on Securing Quality (Systems and Controls)**

2.1	ESG ratings and data products providers should adopt and implement written policies and procedures designed to help ensure the issuance of high quality ESG ratings and data products.	<p>ISS STOXX Sustainability has a robust research methodology and processes in place designed to ensure the consistent and timely delivery of high-quality and reliable research.</p> <p>Please refer to ISS’ consolidated statement, specifically Principle Two (Securing Quality), for more information.</p>
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**Actions**

These policies and procedures should be drafted taking into account the nature, scale and complexity of ESG ratings and data products providers’ respective businesses and should require that ESG ratings/data products are based on:

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2.4	(A) publicly disclosed data sources, where possible, and other information sources, where necessary;	<p>ISS STOXX Sustainability is dedicated to a high level of public disclosure and transparency across our sustainability products and services, involving both transparency regarding the underlying research methodologies as well as the processes by which research and data solutions are produced and delivered.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Five (Ensuring Transparency), for more information.</p> <p>Information on ISS STOXX Sustainability methodologies and processes governing research and solutions can be found <a href="#">here</a>.</p>
2.5	(B) the adoption, implementation and provision of transparency around methodologies for their ESG ratings and data products that are defined, rigorous, systematic, applied continuously, in accordance with Principle 4, while maintaining a balance with respect to proprietary or confidential aspects of the methodologies; and	See 2.4.
2.6	(C) a thorough analysis of relevant information consistent with the applicable methodologies available to the ESG ratings and data products providers at the time of determination.	<p>ISS STOXX Sustainability employs robust systems and controls designed to ensure the accuracy, quality, timeliness, and independence of our research. With respect to quality assurance, this includes internal quality checks and controls as well as the review of processes. Moreover, ISS STOXX Sustainability conduct analyses of our methodologies and outputs internally. Details on these approaches are provided to clients upon request.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Two (Securing Quality), for more information.</p>
<p>Furthermore, having regard to the nature, scale and complexity of their respective businesses, ESG ratings and data products providers should also ensure:</p>		
2.8	(A) they monitor on an ongoing basis and regularly update, as appropriate, their ESG ratings and data products, except where specifically disclosed that the rating is a point in time rating;	<p>The ISS STOXX Sustainability research team conducts systematic source monitoring to identify relevant information as it becomes available. ISS STOXX Sustainability also applies a staged refresh procedure to ensure that its data, assessments, scores and ratings are up to date. Scheduled annual updates are complemented by ad hoc updates in cases of incidents such as controversies or corporate actions (once disclosure reflecting the corporate action becomes</p>

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		<p>available).</p> <p>Please refer to ISS' consolidated statement, specifically Principle Two (Securing Quality), for more information.</p>
2.9	<p>(B) they regularly review the relevant methodologies and sufficiently communicate changes made to the methodologies as well as potential impacts of these changes to the ESG ratings and data products;</p>	<p>ISS STOXX Sustainability has established a Global Methodology Governance Structure which encompasses a cross-functional team of methodology and quality experts and an internal independent oversight body composed of global research, methodology, and product leads, and advised by compliance officers.</p> <p>The methodology team works with internal stakeholders to initiate, develop, and agree upon proposed and required methodology developments and enhancements, and maintain regularly updated public methodology information reflecting updates. The team also coordinates a quarterly Methodology Updates communication to ISS STOXX Sustainability clients to inform them of upcoming enhancements to the research methodology underlying ISS STOXX Sustainability's solutions and data. The updates include detailed change log files, where relevant. These quarterly communications are also complemented by communications to clients when significant methodological, product, and/or data platform developments occur.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Two (Securing Quality), for more information.</p>
2.10	<p>(C) they maintain internal records to support their ESG ratings and data products;</p>	<p>ISS employs a Document Retention Policy ("Retention Policy"), applying to all Covered employees, to improve the registered investment efficiency and effectiveness of the operations of the Company as well as ensure compliance with applicable laws. As a adviser with the United States Securities and Exchange Commission ("SEC") under the Investment Adviser Act of 1940 (the "Act"), ISS is subject to the Act's specific rule on record retention.</p> <p>Please refer to ISS' <a href="#">Code of Ethics</a> and ISS' <a href="#">General Code of Conduct</a> for more information.</p>
2.11	<p>(D) they have sufficient resources (personnel</p>	<p>ISS has a clearly defined organizational</p>

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	<p>and technological capabilities) to consistently apply the relevant methodologies to determine high quality ESG ratings and data products, to seek out information they need in order to make an assessment, analyse all the information relevant to their decision-making processes, and conduct quality control on their processes and production of ESG ratings and data products.</p> <p>The quality controls should include both</p> <p>(i) procedural checks to ensure that the methodology and internal processes are followed correctly; and</p> <p>(ii) holistic checks to ensure that the process considering the plausibility, coherence and logic of the product is sound. The quality control framework should also allow for the appropriate and timely consideration of information brought to ESG ratings and data products providers' attention by covered entities or users, as outlined at action 6.10 below; and</p>	<p>structure with transparent and consistent roles and responsibilities for the human resources involved in the assessment, publication, and oversight of ESG ratings and data products, who are also aided by technological capabilities and supporting functions in the wider organization.</p> <p>The ISS STOXX Sustainability research team comprises experienced research professionals and investment practitioners who come from an array of relevant backgrounds.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Two (Securing Quality) and Principle Three (Human Resources Development), for more information.</p>
2.12	(E) the personnel involved in the determination, publication or oversight, as appropriate, of ESG ratings and data products are professional, competent, and of high integrity.	See 2.11.
2.13	ESG ratings and data products providers could consider providing ESG ratings and data products to clients in a machine-readable format.	ISS provides ESG rating and data products to clients via various formats such as data feeds, SFTP transfer, API, and proprietary client-facing platforms.
<b>3. Principle on Conflicts of Interest</b>		
3.1	ESG ratings and data products providers should adopt and implement written policies and procedures designed to help ensure their decisions are independent, free from political or economic interference, and appropriately address actual or potential conflicts of interest that may arise from, among other things, the ESG ratings and data products providers' organisational structure, business or financial activities, or the financial interests of the ESG ratings and data products providers and their officers and employees.	<p>ISS addresses conflicts of interest by being a transparent, policy-based organization. ISS has implemented extensive policies and procedures to identify, manage, and disclose conflicts of interest, and has adopted controls reasonably designed to manage each of those risks. These policies are intended to establish appropriate standards and procedures to protect the integrity and independence of the research, recommendations, ratings, and other analytical offerings produced by ISS.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Four (Ensuring Independence and Managing Conflicts of Interest), for more information.</p>
3.2	ESG ratings and data products providers should identify, avoid or appropriately manage, mitigate	ISS has a dedicated Compliance Department, headed by a Chief

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	and disclose actual or potential conflicts of interest that may compromise the independence and integrity of the ESG ratings and data products providers' operations.	<p>Compliance Officer, that routinely reviews the business and updates policies and procedures as necessary to reflect business changes or other developments. Over the years, ISS has implemented specific compliance and disclosure practices.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Four (Ensuring Independence and Managing Conflicts of Interest), for more information.</p>
<b>Actions</b>		
ESG ratings and data products providers should:		
3.5	(A) adopt written internal policies and procedures and mechanisms designed to (1) identify, and (2) eliminate, or manage, mitigate and disclose, as appropriate, any actual or potential conflicts of interest related to their ESG ratings or data products that may influence the opinions and analyses ESG ratings and data products providers make or the judgment and analyses of the individuals they employ who have an influence on their ESG ratings or data products decisions; and	See 3.1.
3.6	(B) disclose such conflict avoidance and management measures.	<p>ISS provides its institutional investor clients with extensive information to ensure that they are fully informed of potential conflicts and the steps that ISS has taken to address them. Among other things, ISS supplies a comprehensive <u>Due Diligence</u> section on its website to assist clients and prospective clients in fulfilling their own obligations regarding the use of independent, third-party providers of ESG ratings or data products. This section of the ISS website includes an area specifically dedicated to the policies, procedures, and practices regarding potential conflicts of interest.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Four (Ensuring Independence and Managing Conflicts of Interest), for more information.</p>
ESG ratings and data products providers should take steps to help ensure that any existing or potential business relationship between them (or their affiliates) and any entity or any other party for which they provide ESG ratings or data products would not affect the integrity of the ESG ratings and data products being offered to those entities or other parties. These steps could include (but are not limited to) the following measures in respect of appropriate staff:		

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3.8	(A) putting in place measures to help ensure such staff refrain from any securities or derivatives trading presenting inherent conflicts of interest with the ESG ratings and data products;	<p>All Covered ISS Employees subject to the ISS Code of Ethics as well as members of their Immediate Family are covered by ISS' Personal Trading Policy which is an essential part of the Company's commitment to eliminating conflicts of interest wherever possible. This Personal Trading Policy is also designed to comply with regulatory requirements imposed on ISS by its status as a registered investment adviser and to prevent personal trading practices that could violate applicable securities laws.</p> <p>Please refer to ISS' <a href="#">Code of Ethics</a> for more information.</p>
3.9	(B) structuring reporting lines for such staff and their compensation arrangements to eliminate or appropriately manage actual and potential conflicts of interest related to their ESG ratings and data products;	<p>There is separation in reporting of the Sustainability Research team from commercially driven functional teams, including Product, Sales, and Client Success.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Two (Securing Quality), for more information.</p>
3.10	(C) not compensating or evaluating such staff on the basis of the amount of revenue that an ESG rating and data products provider derives from an entity for which such staff provides ESG ratings and data products, or with which such staff regularly interact regarding such ESG ratings and data products; and	<p>Sustainability Research and data teams' salaries, bonuses, and other forms of compensation are not linked to any specific commercially driven activity or sale.</p> <p>ISS employees' salaries, bonuses, and other forms of compensation are not linked to any specific ISS-Corporate activity or sale.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Four (Ensuring Independence and Managing Conflicts of Interest), for more information.</p>
3.11	(D) where consistent with confidentiality, contractual and other business, legal and regulatory requirements, disclosing in respect of such staff the general nature of the compensation arrangement or any other business or financial relationships that exist with an entity for which the ESG ratings and data products provider provides ESG ratings or data products.	See 3.6.
-	(Other steps taken, if any:)	ISS Corporate Solutions ("ISS-Corporate"), a wholly-owned subsidiary of ISS, provides services to corporate issuers that include

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		<p>second-party opinions and ratings on an issuer-paid basis on some privately-held companies. Such research offerings may incorporate data, research, and insights provided by ISS STOXX Sustainability. Neither ISS, nor ISS-Corporate enter into any contingent fee arrangement when providing ESG rating and research services.</p> <p>ISS maintains a firewall between its business for institutional investors and the services offered by ISS-Corporate.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Four (Ensuring Independence and Managing Conflicts of Interest), for more information.</p>
<b>Actions</b>		
ESG ratings and data products providers should, where applicable:		
4.4	(A) make public disclosure and transparency a priority for their ESG ratings and data products offerings, subject to commercial sensitivity considerations;	<p>ISS STOXX Sustainability has a dedicated public <a href="#">Methodology Information</a> webpage outlining our sustainability research methodologies and the quality and research processes spanning our various sustainability research offerings. The webpage provides an overview of ISS STOXX Sustainability's approach to methodological oversight, quality principles, research processes, and the associated limitations to ISS STOXX Sustainability's methodologies and data, as well as the actions we take to address these.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Five (Transparency), for more information.</p>
4.5	(B) clearly describe their ESG ratings and data products to enable the users to understand the ESG rating's or ESG data product's intended purpose including its measurement objective; and	See 4.4.
4.6	(C) publish sufficient information about the methodologies underlying their ESG ratings and data products and how they ensure their consistent implementation to enable the users of these products to understand how their outputs were determined.	<p>ISS is mindful of the distinction between public-facing and client-facing disclosure, and also notes the specific circumstances of client-customized and bespoke ESG evaluation work for which public-facing disclosure is not appropriate.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Five</p>

		(Transparency), for more information.
4.7 - 4.16	<p>ESG ratings and data products providers should, where applicable, publish information that is relevant to understanding their methodologies, subject to any proprietary or confidentiality considerations. This information may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>(A) the measurement objective of the ESG rating;</li> <li>(B) the criteria used to assess the entity or company;</li> <li>(C) the KPIs used to assess the entity against each criterion;</li> <li>(D) the relative weighting of these criteria to that assessment;</li> <li>(E) the scope of business activities and group entities included in the assessment;</li> <li>(F) the principal sources of qualitative and quantitative information used in the assessment, including for example whether the information is forward-looking (such as transition plans), the use of industry averages, estimations or other methodologies when actual data is not available, as well as information on how the absence of information was treated;</li> <li>(G) the time horizon of the assessment;</li> <li>(H) the meaning of each assessment category; and</li> <li>(I) a regular evaluation of their methodologies against the outputs which they have been used to produce.</li> </ul>	<p>See 2.4 and 4.4.</p> <p>An example of ISS' transparency can be seen in ISS STOXX Sustainability's expanded and more granular methodology document for the Corporate Rating, which includes the measurement objective of the rating, the principal sources of qualitative and quantitative information used in the assessment, and how absence of information is treated, along with the time horizon of the assessment.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Five (Transparency), for more information as well as the <a href="#">Corporate Rating methodology document</a>.</p>
<b>5. Principle on Confidentiality (Systems and Controls)</b>		
5.1	<p>ESG ratings and data products providers should adopt and implement written policies and procedures designed to address and protect all non-public information received from or communicated to them by any entity, or its agents, related to their ESG ratings and data products, in a manner appropriate in the circumstances.</p>	<p>In general, ISS recognizes that it may possess confidential and/or proprietary information that has been disclosed to ISS by its clients and other third parties. ISS' <a href="#">General Code of Conduct</a>, for which all analysts receive annual training, includes a section dedicated to "Confidentiality of Information," and ISS may issue periodic communications to employees on the importance of protecting confidential and proprietary information belonging to ISS and/or to ISS' clients, issuers, and other third parties.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Six</p>

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		<p>(Confidentiality), for more information.</p> <p>Please also refer to ISS' <a href="#">General Code of Conduct</a> for more information.</p>
<b>Actions</b>		
ESG ratings and data products providers should:		
5.4	(A) adopt and implement written policies and procedures and mechanisms related to their ESG ratings and data products designed to address and protect the non-public nature of information shared with them by entities under the terms of a confidentiality agreement or otherwise under a mutual understanding that the information is shared confidentially;	See 5.1.
5.5	(B) adopt and implement written policies and procedures designed to address the use of non-public information only for purposes related to their ESG ratings and data products or otherwise in accordance with their confidentiality arrangements with the entity; and	<p>ISS STOXX Sustainability may accept and use supplementary non-material, non-public information provided by companies that are the subject of some ISS STOXX Sustainability research solutions for investors. To foster transparency to all other stakeholders, however, it is ISS STOXX Sustainability's strong preference that companies make public all such information.</p> <p>ISS STOXX Sustainability makes clear that it does not offer, and no company should expect, obligations of confidentiality with respect to any non-public information provided by the company. ISS STOXX Sustainability does not and will not solicit, accept, or use in its research material non-public information (where materiality is defined from a traditional securities law perspective to mean information that, if omitted, would be viewed by a reasonable investor as having significantly altered the total mix of information).</p> <p>Please refer to ISS' consolidated statement, specifically Principle 6 (Confidentiality), for more information.</p> <p>Please also refer to the <a href="#">Non-Public Information in Sustainability Research</a> document on the ISS Website.</p>
5.6	(C) include information on data confidentiality management and on the protection of non-public information to the extent terms of engagement are published.	Through the publicly available document <a href="#">Frequently Asked Questions: The Corporate Rating Process: A Guide for Corporate Issuers</a> , companies can obtain further background about our research and details about our processes.

		Please refer to ISS' consolidated statement, specifically Principle Seven (Communication with Companies), for more information.
<b>6. Principle on Engagement (Systems and Controls)</b>		
6.1	ESG ratings and data products providers should regularly consider whether their information gathering processes with entities covered by their products leads to efficient information procurement for both the providers and these entities. Where potential improvements to information gathering processes are identified, ESG ratings and data products providers should consider what measures can be taken to implement them.	ISS STOXX Sustainability takes an open and transparent approach in relation to corporate issuers and seeks to provide issuers with clarity and insight into, and understanding of, our research processes and methodologies as well as the data and analyses that are integrated into our reports. We recognize the importance of first-hand information and insights and balance this against our priority of producing objective, independent research. ISS regularly reviews our information gathering processes with entities.  Please refer to ISS' consolidated statement, specifically Principle Five (Transparency) and Principle Seven (Communication with Companies), for more information.
6.2	Where feasible and appropriate, ESG ratings and data products providers should respond to and address issues flagged by entities covered by their ESG ratings and data products and by users while maintaining the independence and integrity of these products.	ISS STOXX Sustainability's policies regarding communication and engagement with issuers are designed to gain the greatest possible insight for clients while safeguarding the independence of ISS STOXX Sustainability's research process and our analysts, as well as prioritizing the delivery of timely and high-quality research for the benefit of our institutional investor clients.  Where feasible and appropriate, ISS STOXX Sustainability responds to and addresses issues raised by covered companies and our clients regarding our ESG ratings and data products.
<b>Actions</b>		
Where they collect information from covered entities on a bilateral basis, ESG ratings and data products providers should:		
6.5	(A) communicate sufficiently in advance by when they expect to request this information regarding their ESG ratings and data products; and	ISS does not conduct surveys of companies for information. However, ISS STOXX Sustainability provides issuers with an opportunity to review for factual accuracy certain draft reports for their respective Corporate Rating, Norm-Based

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		<p>Research, and Controversial Weapons Research and notifies them in advance where applicable. Pre-inputted information is provided as relevant.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Seven (Communication with Companies), for more information.</p>
6.6	(B) include in their requests, pre-inputted information either from publicly available sources or from the covered entities' previous submissions, where possible, for the covered entities' review or confirmation.	See 6.5.
ESG ratings and data products providers should:		
6.8	(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 ratings and data products provider;	<p>Questions and feedback can also be submitted through our central ISS STOXX Help Center. Companies can also contact the ISS STOXX Help Center at any point in time with information/updates relevant to our research.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Seven (Communication with Companies), for more information.</p>
6.9	(B) where feasible and appropriate, inform covered entities: (i) that they are in the process of being assessed; and (ii) of the principal categories of data on which an ESG rating is based before the publication of the ESG rating;	See 6.1 and 6.5.
6.10	(C) allow the covered entity and users to draw attention to any factual errors or omissions in the ESG rating or ESG data product, including the data and information underlying the ESG rating or ESG data product; and	See 6.4.
6.11	(D) publish terms of engagement describing how ESG ratings and data products providers will typically engage with their covered entities, including when information is likely to be requested and the opportunities available (if any) to the covered entity for review.	<p>Through the publicly available document <a href="#">Frequently Asked Questions: The Corporate Rating Process: A Guide for Corporate Issuers</a>, companies can obtain further background about our research and details about our processes.</p> <p>Please refer to ISS' consolidated statement, specifically Principle Seven (Communication with Companies), for more information.</p>



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ISS STOXX Sustainability enables investors to develop and integrate responsible investing policies and practices, engage on responsible investment issues, and monitor portfolio company practices through screening solutions. It also provides climate data, analytics, and advisory services to help financial market participants understand, measure, and act on climate-related risks across all asset classes. In addition, our Sustainability solutions cover corporate and country research and ratings enabling its clients to identify material social and environmental risks and opportunities. Sustainability solutions are provided by Institutional Shareholder Services Inc., an investment adviser registered under the U.S. Investment Advisers Act of 1940.

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