Sustainability

Complaints Policy

How Complaints With Regard to ESG Ratings are Handled

Policy | V 1.0 | Compliance

ISS STOXX

Contents

1. Definitions

For the purpose of this policy, the following definitions apply. Except where the context requires otherwise, words denoting the singular include the plural and vice versa.

TERM	DEFINITION
Complaint	Definition provided in Section 4.
Complainants	Definition provided in Section 4.
ESGRR	Regulation (EU) 2024/3005 of the European parliament and of the council of 27 November 2024 on the transparency and integrity of environmental, social and governance (ESG) rating activities.
ESG Rating	Opinion[1] or score[2], or a combination of both, regarding a rated item's profile or characteristics with regard to environmental, social and human rights, or governance factors, or regarding a rated item's exposure to risks or impact on environmental, social and human rights, or governance factors, that is based on both an established methodology and a defined ranking system of rating categories, irrespective of whether such ESG rating is labelled as 'ESG rating', 'ESG opinion' or 'ESG score'.
ISS STOXX Sustainability	The ISS STOXX Group's Sustainability Solutions business unit[3].
ISS STOXX	ISS STOXX Group of companies i.e., ISS STOXX GmbH and all affiliated entities under its control, including ISS Germany.
Rated Item	A legal person, a financial instrument, a financial product, a public authority or a body governed by public law which is explicitly or implicitly rated in the ESG Rating, irrespective of whether such rating has been requested and irrespective of whether the legal person, public authority or body governed by public law has provided information for that ESG rating.
User of ESG Rating	A natural or legal person, a public authority, an agency or other body governed by public law, to which an ESG Rating is distributed by subscription or other contractual relationships.

[1] An ESG assessment that is based on a rule-based methodology and defined ranking system of rating categories, involving directly a rating analyst in the rating process, cp. Art. 3(2), ESGRR.

[2] An ESG measure derived from data, using a rule-based methodology, and based only on a pre-established statistical or algorithmic system or model, without any additional substantial analytical input from a rating analyst, cp. Art. 3(3), ESGRR.

[3] ISS STOXX Sustainability operates through mutiple legal entities. In the EU, ESG Ratings are provided through Institutional Shareholder Services Germany AG.

2. Objective & Purpose

This policy sets out the framework governing the receipt, handling, investigation, and record-keeping of Complaints by ISS STOXX Sustainability, in line with applicable ESGRR requirements.

3. Scope

This policy applies to all Complaints related to ESG Ratings issued, published, or distributed by ISS STOXX Sustainability, as defined in the section below.

4. Complaints

Under this policy, "**Complaint**" refers to any formal, case-specific, and substantiated written objection submitted by an eligible "**Complainant**" in relation to a specific ESG Rating issued by ISS STOXX Sustainability, which meets all of the admissibility criteria set out below.

1. Eligible Complainants

Complaints may only be submitted by: (i) Users of ESG Ratings; (ii) Rated Items; (iii) issuers of a Rated Item.

2. Admissable subject matter

A submission shall qualify as a Complaint only if it relates directly to a specific ESG Rating provided by ISS STOXX Sustainability and concerns one or more of the following:

(a) Factual accuracy: demonstrable errors or inaccuracies in the data sources used for the ESG Rating or the resulting ESG Rating outputs;

(b) Application of the methodology: incorrect or inconsistent application of the approved ESG Rating methodology to the specific case;

(c) Outcome representation: a material misrepresentation of the Rated Item or issuer of a Rated Item arising directly from point (a) or (b) above.

3. Substantiation threshold

A submission shall be treated as a Complaint if all of the following criteria are met:

(a) Specificity: Complainant clearly identifies the ESG Rating, data points, methodology elements, or outputs being challenged;

(b) Evidence-based: Complainant includes verifiable documentary evidence supporting the alleged error or misapplication;

(c) Materiality: demonstrates that the alleged issue which is subject of the complaint could reasonably influence the rating outcome or its reliability;

(d) Clarity of claim: articulates a concrete and testable allegation, not a general concern or opinion.

4. Minimum content requirements

As a minimum, Complaints must include:

(a) identification of the Complainant (full name and contact address of the Complainant and, if applicable, the company name and the contact address and role (i.e. User of ESG Rating, Rated Item, issuer of a Rated Item);

(b) identification of the specific ESG Rating concerned;

(c) a precise description of the alleged issue, referencing relevant data points or methodology elements;

(d) supporting evidence (e.g. documents, datasets, public disclosure);

(e) reasoning for the potential impact on the rating outcome;

(f) date of submission.

Any submission that does not meet the admissibility criteria set out above shall not be considered a Complaint under this Policy.

In particular, any correspondence that consists solely of general dissatisfaction with an ESG Rating, subjective opinions, requests for clarification or explanation, forward looking expectations, strategic or advocacy positions, or hypothetical or industry wide concerns not linked to a specific ESG Rating shall not qualify as a Complaint. Similarly, submissions that are incomplete, insufficiently detailed, or not supported by verifiable evidence demonstrating a material impact on the ESG Rating shall be excluded from classification as a Complaint.

4. Submission

Complaints shall be submitted:

- By Users of ESG Ratings, via email to the Client Success team at the following address: client.success@iss-stoxx.com;
- By Rated Items or Issuers thereof, via the ISS STOXX Help Desk at the following link: https://helpcenter.iss-stoxx.com/csp.

5. Complaints Handling

Once a correspondence that may constitute a Complaint is received through the above-mentioned channels, ISS STOXX Sustainability will assess whether it meets all criteria defined in section 4 above to be classified as a Complaint.

If the correspondence does not meet the aforementioned criteria, ISS STOXX Sustainability will communicate it to the User of ESG Rating, Rated Item or Issuer of a Rated Item within 5 business days. Otherwise, ISS Germany shall acknowledge the Complaint received and give an indication of the process time to the Complainant, also within 5 business days upon receipt.

ISS STOXX Sustainability will investigate complaints in a timely and fair manner, and independently of any personnel who have been involved in the determination of the concerned ESG Rating. The outcome of the investigation will be communicated to the Complainant within a reasonable period of time, unless such communication is contrary to the objectives of public policy or to the EU Market Abuse Regulation.

ISS STOXX Sustainability will use best effort to conclude the investigation and communicate the related outcome within thirty (30) business days from the aforementioned acknowledgement. If the complexity of the matter requires it, ISS STOXX Sustainability reserves the rights to implement a longer timeline.

The response to the Complainant shall be made in writing using plain and clear language. When making a final decision that does not fully satisfy the Complainant’s demand, the internal investigator shall include a thorough explanation of ISS STOXX Sustainability’s position on the Complaint.

6. Record-Keeping

ISS STOXX Sustainability shall keep records of all documents relevant to this policy and relevant procedures in accordance with its Record-Keeping Policies and Procedures.

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