

Annex D: Checklist for Singapore Code of Conduct for ESG Rating and Data Product Providers

With the implementation of the industry Code of Conduct for ESG Rating and Data Product Providers (“**Code**”) on a “Comply or Explain” basis, ESG Rating and Data Product Providers¹ who adopt the Code are encouraged to provide a self-attestation on their compliance with the Code.

For this purpose, we have set out a Checklist for Code of Conduct for ESG Rating and Data Product Providers (“**Checklist**”). Providers can assess their own compliance with the principles and best practices by completing the Checklist. The Checklist guides the posture of, and progress on full compliance with the Code. Providers are encouraged to disclose in detail on their compliance to each best practice, publish the Checklist on their websites for their self-attestation, and inform ICMA via SingaporeESGCode@icmagroup.org. ICMA will host the list of Providers which have adopted the Code, on its website.

The Checklist clearly identifies (i) the good practices set out in the International Organisation of Securities Commissions’ (“**IOSCO**”) Call for Action paper², and (ii) the additional Singapore specific best practices (highlighted in yellow). This enables providers to use the Checklist for cross-jurisdictional comparison of standards for their operations, facilitating interoperability with the codes of conduct in other jurisdictions.

Where the self-attestation has been verified for compliance to the Code by an independent external assessor, please indicate below:	
Name of Provider (Please indicate)	CFP Green Buildings
Type of Provider (Please select one)	<input type="checkbox"/> ESG Rating and Data Product Provider <input type="checkbox"/> ESG Rating Provider <input checked="" type="checkbox"/> ESG Data Product Provider
Company Name of the Independent External Assessor	N/A
Date of Assessment	N/A
Remarks by Assessor, if any	N/A

CFP submits this self-attestation checklist in response to this Code of Conduct as well as a [Statement of Applicability](#) for Global Codes of Conduct for ESG ratings and data products providers

¹ As defined in the Code, “ESG Rating and Data Product Provider” means any ESG Rating Provider, any ESG Data Product Provider, or any provider of both ESG rating and ESG data product.

² The IOSCO “Call for Action” paper is available at <https://www.iosco.org/library/pubdocs/pdf/IOSCOPD717.pdf>.

Principle 1: The ESG Rating and Data Product Provider should adopt and implement written policies and procedures designed to ensure the issuance of high quality ESG rating and data products based on publicly disclosed data sources where possible, and other information sources where necessary, using transparent and defined methodologies.

Please explain to what extent, in respect of which ESG ratings and/or ESG data products, the provider is in compliance with Principle 1, based on (i) IOSCO's good practices and (ii) Singapore's specific requirements.

	Complied?			<p>If Yes, please disclose how this is complied with. <i>E.g. provide links to relevant policies and procedures.</i></p> <p>If No, please explain. <i>E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.</i></p>
	Yes	No	NA	
<p><u>Best Practice 1:</u></p> <p>1. The ESG Rating and Data Product Provider should:</p>				
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"/>	<p>CFP has adopted and implemented comprehensive policies and procedures aimed at ensuring that its ESG data products are based on a thorough analysis of all relevant and available information. This includes the use of advanced analytics for data collection and quality assurance processes, supported by both technology and human expertise</p>
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"/>	<p>CFP utilizes transparent and defined methodologies that are:</p> <ul style="list-style-type: none"> • Rigorous and systematic, applied consistently across its products. • Regularly reviewed and externally validated. • Balanced between transparency and protection of intellectual property <p>Methodology documentation is available to clients under NDA.</p>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn't supply ESG Ratings

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"/>	<p>CFP reviews its data and methodology standards continuously, with:</p> <ul style="list-style-type: none"> • Communication of updates to clients. • A maintained data change log tracking modifications. • Sufficient explanation of the impact of changes.
e. provide transparency, where reasonably possible, around the sources of data used in determining its ESG rating and data products, including the use of any industry averages, estimations or other methodologies when actual data is not 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>CFP ensures transparency regarding:</p> <ul style="list-style-type: none"> • Source and type of each data point (e.g., reported or estimated, internal or third-party). • Timeliness and estimation confidence levels. • Assumptions underlying any estimates used.
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 – <ul style="list-style-type: none"> • reviewing, on a regular basis, the ESG rating of the rated entity; 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP:</p> <ul style="list-style-type: none"> • Employs automated quality controls and human checks for continual monitoring. • Enables clients and entities to flag errors or request updates. • Maintains traceability and reproducibility of sustainability metrics.

<ul style="list-style-type: none"> • (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 • (Singapore) updating on a timely basis the ESG rating, as appropriate, based on the results of such review; 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn't supply ESG Ratings
g. maintain records to support every ESG rating and data products that it issues.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CFP maintains comprehensive logs and historical data to ensure that every change is recorded and auditable, allowing for full traceability of ESG data products.
(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"/>	CFP adheres to regulatory specifications for 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; (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"/>	CFP ensures professional, competent, and ethical personnel, both individually and collectively. This includes: Education and training for internal teams of ESG and tech experts. Adherence to a Code of Conduct that outlines values and integrity expectations.
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CFP invests in both technological capabilities and human expertise. The ESG team includes sustainability experts, data scientists, and IT professionals working together to maintain and evolve CFP's ESG data products. The methodology includes: <ul style="list-style-type: none"> • Procedural checks to verify adherence to methodologies, • Advanced technology for data validation and processing.

assurance (e.g. verification of data).				<ul style="list-style-type: none"> • A "human-in-the-loop" model ensuring quality and reliability. • Processes for considering new information flagged by clients or stakeholders.
(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 data, it should make clear, in a prominent place, the limitations of the ESG rating;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn't supply ESG Ratings
j. consider offering ESG rating and data products to clients in a machine - readable format; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CFP provides its data products via a digital platform, API or csv files.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn't supply ESG Ratings

Principle 2: The ESG Rating and Data Product Provider should adopt and implement written policies and procedures designed to ensure its decisions are independent, free from political or economic interference, and appropriately address potential conflicts of interest that may arise from, among other things, its organisational structure, business or financial activities, financial interests, and personnel.

Principle 3: The ESG Rating and Data Product Provider should identify, avoid or appropriately manage, mitigate and disclose potential conflicts of interest that may compromise the independence and objectivity of its operations.

Please explain to what extent, in respect of which ESG ratings and/or ESG data products, the provider is in compliance with Principles 2 and 3, based on (i) IOSCO's good practices and (ii) Singapore's specific requirements.

Best Practice 2: 2. The ESG Rating and Data Product Provider should:	Complied?			If Yes, please disclose how this is complied with. <i>E.g. provide links to relevant policies and procedures.</i> If No, please explain. <i>E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.</i>
	Yes	No	NA	
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"/>	CFP has written policies and procedures in place to: <ul style="list-style-type: none"> Identify and manage both actual and potential conflicts of interest. Ensure decisions are independent and not influenced by political or economic factors. CFP acknowledges that conflicts may arise, particularly in the context of business growth and evolving industry dynamics. In response, CFP continuously monitors and updates its conflict of interest policies. This includes: <ul style="list-style-type: none"> Maintaining independence between ESG rating activities and other business lines (e.g., consulting), aligning with the Singapore Code. Ensuring that internal reviews and checks are applied before any production data changes
(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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn't supply ESG Ratings
b. disclose its conflicts identification and management measures;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CFP has a conflict management approach that relies on both technological independence (via algorithms) and organizational procedures to maintain the integrity of outputs. All employees and contractors are required to adhere to the internal Code of Conduct, which includes provisions related to conflict identification and mitigation.

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"/>	<p>CFP has firm boundaries in place between business relationships and ESG output generation:</p> <ul style="list-style-type: none"> • Clients can customize input parameters but cannot influence algorithmic outcomes beyond their own dataset. • Only client-specific data is affected and is not used to influence broader methodologies or ratings.
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"/>	<p>CFP has a Code of Conduct governing employee behavior requiring staff to act with integrity and avoid conflicts in all roles involving ESG products.</p>
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"/>	<p>CFP has clear reporting lines and development of products is independent and objective to avoid bias.</p>
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"/>	<p>CFP distances performance evaluation from client influence. The methodology and scoring processes are developed independently and not client-contingent. Analysts are not evaluated based on revenue from rated entities.</p>

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>CFP has written policies and procedures in place to:</p> <ul style="list-style-type: none"> Identify and manage both actual and potential conflicts of interest. Ensure decisions are independent and not influenced by political or economic factors. <p>CFP acknowledges that conflicts may arise, particularly in the context of business growth and evolving industry dynamics. In response, CFP continuously monitors and updates its conflict of interest policies. This includes:</p> <ul style="list-style-type: none"> Maintaining independence between ESG rating activities and other business lines (e.g., consulting), aligning with the Singapore Code. <p>Ensuring that internal reviews and checks are applied before any production data changes</p>
3. (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 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn't supply ESG Ratings

Principle 4: The ESG Rating and Data Product Provider should make adequate levels of public disclosure and transparency a priority for its ESG rating and data products, including their methodologies and processes to enable the users of the ESG rating and data products to understand what the product entails and how it is produced, while maintaining a balance with respect to proprietary or confidential information, data and methodologies.

Please explain to what extent the provider, in respect of which ESG ratings and/or ESG data products, the provider is in compliance with Principle 4, based on (i) IOSCO's good practices and (ii) Singapore's specific requirements.

	Complied?	
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<p><u>Best Practice 4:</u></p> <p>4. The ESG Rating and Data Product Provider should:</p>	Yes	No	NA	<p>If Yes, please disclose how this is complied with. <i>E.g. provide links to relevant policies and procedures.</i></p> <p>If No, please explain. <i>E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.</i></p>
<p>a. make adequate levels of public disclosure and transparency a priority for its ESG rating and data products, subject to commercial sensitivity considerations;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP utilizes transparent and defined methodologies that are:</p> <ul style="list-style-type: none"> • Rigorous and systematic, applied consistently across its products. • Regularly reviewed and externally validated. • Balanced between transparency and protection of intellectual property <p>Methodology documentation is available to clients under NDA.</p>
<p>b. clearly label its ESG rating and data products to enable the user to understand the ESG rating's or ESG data product's intended purpose including its measurement objective;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP ensures that:</p> <ul style="list-style-type: none"> • ESG metrics and outputs are clearly labeled. • Users are informed of the purpose and scope of each ESG data product, including whether values are calculated, estimated, or user-supplied. • Documentation specifies the origin, calculation approach, and usage context of each data point, ensuring that end-users understand measurement objectives and functional roles.
<p>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);</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The CFP methodology documentation explicitly includes:</p> <ul style="list-style-type: none"> • Whether data is reported or estimated. • The origin of the data (e.g., CFP vs external provider). • The confidence level of estimated data. • A statement on the use of industry averages or proxies when actual data is unavailable. <p>This level of transparency supports user understanding of the data basis and limitations, aligned with the expectation of disclosing source nature (public, private, estimated).</p>

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; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP provides thorough documentation to:</p> <ul style="list-style-type: none"> • Describe how each metric is constructed. • Detail the inputs, assumptions, and algorithms involved. • Enable users to understand the logic, structure, and reliability of outputs. • Highlight how data is processed and verified, including via automated controls and human review. <p>Moreover, CFP investigates all data inquiries with diligence, offering stakeholders access to examine the inputs and resulting scores.</p>
<p>e. make adequate levels of public disclosure on ESG rating and data products methodologies that include, but not limited to:</p> <ul style="list-style-type: none"> • the measurement objective of the ESG rating and data products; • the criteria used to assess the covered entity; • the Key Performance Indicators used to assess the covered entity against each criterion; • the relative weighting of these criteria to that assessment; • the scope of business activities and group entities included in the assessment; • the principal sources of qualitative and quantitative information used in the assessment as well as information on how the absence of information was treated; • the time horizon of the assessment; • the meaning of each assessment category (where relevant); 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Transparency is a core principle of CFP's operations. CFP offers clients documentation on:</p> <ul style="list-style-type: none"> • Data sources, estimation techniques, and confidence levels. • The methodological framework for scoring and metrics. <p>While proprietary methodologies are protected, CFP provides external validation reports to clients under NDA and explains core assumptions and calculation structures.</p>

<p>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); and</p> <p>(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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 4d.
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Principle 5: The ESG Rating and Data Product Provider should adopt and implement written policies and procedures designed to address and protect all non-public information received from or communicated to it by any entity, or its agents, related to its ESG rating and data products, where appropriate in the circumstances.

Please explain to what extent, in respect of which ESG ratings and/or ESG data products, the provider is in compliance with Principle 5, based on (i) IOSCO's good practices and (ii) Singapore's specific requirements.

Best Practice 5: 5A. The ESG Rating and Data Product Provider should:	Complied?			If Yes, please disclose how this is complied with. <i>E.g. provide links to relevant policies and procedures.</i> If No, please explain.
	Yes	No	NA	
				<i>E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.</i>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP has confidentiality policies embedded in its operations, including:</p> <ul style="list-style-type: none"> • Strict internal protocols for handling non-public or sensitive data. • Employee obligations to uphold confidentiality as outlined in CFP’s Code of Conduct and Information Security Policies. <p>Data management aligned with ISO 27001 and SOC 2 Type II standards, ensuring that non-public data is secured, encrypted, and access-controlled.</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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn’t supply ESG Ratings
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; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP:</p> <ul style="list-style-type: none"> • Uses non-public information strictly for ESG-related purposes or in line with agreed-upon confidentiality arrangements. • Has robust internal procedures ensuring that non-public information is not used for any unauthorized purposes. • Operates under internationally recognized frameworks such as ISO 27001 and SOC 2 Type II, which confirm the firm’s strict information governance practices, including access control and purpose limitation.

c. include information on data confidentiality management and on the protection of non-public information to the extent terms of engagement are published.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Where applicable, CFP includes details of: How confidential data is handled within engagement documentation. The controls and safeguards in place to protect this information. While specific terms of engagement are not published publicly in the document, the statement does affirm that CFP's information security certifications (ISO 27001, SOC 2 Type II) reflect its commitment to data confidentiality management
5B. (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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CFP doesn't supply ESG Ratings

Principle 6: The ESG Rating and Data Product Provider should ensure that information gathering processes with the covered entity, where relevant, is done in a manner that leads to efficient information procurement for it and these entities.

Principle 7: Where feasible and appropriate, the ESG Rating and Data Product Provider should respond to and address issues raised by the covered entity while maintaining the objectivity of these products.

Please explain to what extent, in respect of which ESG ratings and/or ESG data products, the provider is in compliance with Principles 6 and 7, based on (i) IOSCO's good practices and (ii) Singapore's specific requirements.

Best Practice 6:	Complied?			If Yes, please disclose how this is complied with. <i>E.g. provide links to relevant policies and procedures.</i> If No, please explain.
	Yes	No	NA	
6. Where the ESG Rating and Data Product Provider collects information from covered entity on a bilateral basis, or through questionnaires, it should consider:				
				<i>E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.</i>

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"/>	CFP engages openly with companies whose data it collects and uses. Communications are designed to be transparent, respectful of boundaries, and free from any influence on pre-defined, rules-based assessments. Companies are encouraged to review data and scores and can provide feedback or flag discrepancies
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"/>	See 6a.

Best Practice 7: 7. The ESG Rating and Data Product Provider should:	Complied?			If Yes, please disclose how this is complied with. <i>E.g. provide links to relevant policies and procedures.</i> If No, please explain. <i>E.g. indicate reason for non-compliance, whether it targets to comply and if so, provide target date of compliance.</i>
	Yes	No	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"/>	CFP ensures open lines of communication between its teams and the entities it assesses. CFP assigns a dedicated account manager or ESG analyst to each client or covered entity Specifically: <ul style="list-style-type: none"> Covered entities are given access to all collected data and scores relevant to them. CFP welcomes and investigates feedback from these entities with diligence. Designated communication channels are established and maintained to handle queries regarding ESG ratings and data products.

<p>b. expeditiously inform the covered entity of the principal grounds on which the:</p> <p>i. ESG rating is based, before or after the publication of the ESG rating; and</p> <p>ii. ESG data product is based, before or after the publication of the ESG data product, where practicable;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See 7a.
<p>c. allow the covered entity time to draw attention to any factual errors, including the data and information underlying the:</p> <p>i. ESG rating; and</p> <p>ii. ESG data product, where practicable;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP allows entities to:</p> <ul style="list-style-type: none"> • Review and comment on their raw and processed data, • Submit corrections or missing data, and • Have that input evaluated promptly by the ESG team.
<p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CFP provides clients with:</p> <ul style="list-style-type: none"> • Engagement terms • When data will be requested, • What kind of feedback is accepted, • Opportunities for review and validation before or after output publication. <p>This structure is communicated through contractual documentation and user guides provided during onboarding.</p>

Document is approved by the Director of the ESG Ratings Provider, ESG Data Products Provider or ESG Rating and Data Product Provider:

Company	CFP Green Buildings
Name of Director	Bram Adema
Date of Approval	June 2025