

This document describes the methodology used for the production of ESG ratings and related products distributed globally under the LSEG brand. References to LSEG products, methodologies, governance frameworks and related disclosures reflect the global operating framework supporting those products and services. This methodology document forms part of the disclosure framework established to support compliance with the Regulation (EU) 2024/3005 and should be read together with the publicly available disclosure documents at: <https://www.lseg.com/en/data-analytics/sustainable-finance/regulatory-disclosures>.

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| Ref | Annex | Article | Requirement | Relevant / Disclosure | Methodology Reference (Section / Title & Page) | |
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| ESMA Reference: | | | | | | |
| RTS on Article 23 | | | | | | |
| Rating Product Disclosures | Annex III 1.f | Article 3(1) | Information on the ESG rating's clearly defined objective and marking whether the rating is assessing risks, impacts, or both, according to the double materiality principle, or any other dimensions, and in the case of double materiality the proportion of the risk and impact materiality. | <p>The objective of the LSEG ESG Fund Scores is to provide a transparent and consistent assessment of the environmental, social and governance characteristics, sustainability-related risks and sustainability-related impacts represented within an investment fund's underlying holdings. The methodology is holdings-based and evaluates funds by aggregating the ESG characteristics of the securities held within the portfolio rather than assessing the fund manager's investment strategy, policies, intentions or stewardship activities.</p> <p>The methodology uses the underlying LSEG ESG Scores assigned at issuer level and combines them using the relative weight of each security within the fund, based on its proportion of the fund's Total Net Assets (TNA). The resulting fund-level scores therefore reflect the ESG profile, sustainability-related risks and sustainability-related impacts of the underlying portfolio at a point in time.</p> <p>Fund scores are expressed on an absolute scale from 0 to 5, where higher scores indicate stronger ESG characteristics relative to the methodology framework. The underlying issuer-level ESG Scores used in the aggregation process incorporate absolute and relative assessments of ESG performance, as described in the LSEG ESG Scores methodology.</p> <p>The LSEG ESG Fund Scores inherit the materiality framework applied within the underlying LSEG ESG Scores methodology. At the issuer level, ESG themes are assessed using a double materiality approach that considers both the potential impact of ESG factors on an entity's long-term value creation and the entity's impacts on environmental and social outcomes.</p> <p>Materiality assessments are performed at ESG theme level within the issuer-level methodology and are expressed through the established materiality classifications (Critical, Material, Relevant and Not Relevant). These materiality determinations are incorporated into the calculation of the underlying issuer-level ESG Scores and are inherited unchanged in the aggregation process used to calculate fund-level scores.</p> <p>As a result, the LSEG ESG Fund Scores reflect the double materiality framework embedded within the underlying issuer-level ESG Scores and therefore capture both sustainability-related risks and sustainability-related impacts represented within a fund's portfolio holdings.</p> | Section 1 Methodology Overview, page 4 | |
| | | | | All underlying company-level ESG scores are calculated in accordance with the LSEG ESG Scores methodology available on the LSEG website. | Refer to LSEG ESG Scores Methodology document. | |
| | | | | (a) A description of the risks covered, where the ESG rating is assessing risks. | Materiality assessments are inherited from the underlying LSEG ESG Scores methodology. At the issuer level, companies are first assigned the LSEG Business Classification (TRBC – The Refinitiv Business Classification). The 153 TRBC Industry Groups are then mapped into 12 ESG Materiality Groups, which provide the basis for assessing the relative importance of each ESG Theme. Materiality assessments consider both sustainability-related financial risks and a company's impacts on environmental and social outcomes and are expressed through the established materiality classifications (Critical, Material, Relevant and Not Relevant). A list of datapoints assessed per theme can be found within sub-section 1.13 Datapoint definitions. | Section 1.2 Company summary, page 4 Sub-section 1.13 Datapoint Definitions, page 9 |
| | | | | (b) A description of the impacts covered, where the ESG rating is assessing impacts. | | |
| | | | | (c) Information on how the risk and impact materiality are taken into account according to the double materiality principle, where applicable. | The LSEG ESG Scores evaluate operational ESG risks. They apply double materiality at ESG theme level, and therefore the fund-level scores apply double materiality too. Materiality mapping (Critical / Material / Relevant / Not Relevant) is applied exclusively at the issuer level considering both financial materiality and a company's material impact on the ESG themes. This is inherited unchanged in the fund-level scores. | Section 1 Methodology Overview, page 4 |
| | (d) Where the ESG rating is based on other materiality dimensions, a description of those dimensions. | The ESG Rating is not based on other materiality dimensions. | Section 1 Methodology Overview, page 4 | | | |
| | Annex III 1.g | Article 3(2) | The ESG rating's scope, namely, whether it covers an individual E, S, or G factor or whether it is an aggregated rating aggregating E, S and G factors, or whether it covers specific issues such as transition risks. | <p>The fund methodology does not modify LSEG ESG Scores rules. Rather, it aggregates raw scores in proportion to the economic exposure the fund has to each issuer. The combination of Lipper collected portfolio holdings data, from fund management companies and LSEG ESG Scores data, from corporates, enables the identification of a fund manager's monthly security positions and therefore the enablement of aggregated LSEG ESG Fund Scores using a weighted average methodology.</p> <p>The weighting of the overarching E, S and G factors in the aggregated fund ESG rating is inherited from the issuer-level LSEG ESG Scores methodology and is not fixed uniformly across rated items. At issuer-level, Theme Scores are combined into E, S and G Pillar Scores using materiality-driven theme weights, and the overall ESG Score is calculated from weighted E, S and G Pillar Scores normalised to 100%. At fund level, issuer-level ESG Scores, Pillar Scores, Theme Scores and ESG Plus Scores are aggregated using holdings weights based on percentage of total net assets, rebased across scored holdings where applicable.</p> | Section 1 Methodology Overview, page 4 Sub-section 1.4 ESG Weighting | |
| | | | | (a) A description of what is covered under the E, S or G factors and which factors are aggregated, where applicable. | | |
| | | | | (b) A description of the specific issues that the ESG rating covers. | A list of datapoints assessed per theme can be found within sub-section 1.13 Datapoint definitions. | Sub-section 1.13 Datapoint Definitions, page 9 |
| | Annex III 1.h | N/A | In the case of an aggregated ESG rating, the weighting of the three overarching E, S and G categories of factors (for example 33 % for the E factor, 33 % for the S factor, 33 % for the G factor), and the explanation of the weighting method, including weight per individual E, S and G category. | The weighting of the overarching E, S and G factors in the aggregated fund ESG rating is inherited from the issuer-level LSEG ESG Scores methodology and is not fixed uniformly across rated items. At issuer level, Theme Scores are combined into E, S and G Pillar Scores using materiality-driven Theme weights, and the overall ESG Score is calculated from weighted E, S and G Pillar Scores normalised to 100%. At fund level, these issuer-level Pillar Scores are aggregated using holdings weights based on percentage of total net assets, rebased across scored holdings where applicable. | Sub-section 1.4 ESG Weighting, page 5 | |
| Annex III 1.i | N/A | Within the E, S or G factors, specification of the topics covered by the ESG rating, and whether they correspond to the topics from the sustainability reporting standards developed pursuant to Article 29b of Directive 2013/34/EU. | LSEG Fund ESG Scores are not meant to describe or act as statements of Sustainability Reporting Standards (CSRD). | Sub-section 1.6 Scope Limitations, page 5 | | |

Regulatory Information

For the purposes of Regulation (EU) 2024/3005 on the transparency and integrity of ESG rating activities, Refinitiv France SAS is the ESG Rating Provider responsible for the issuance of the relevant ESG ratings within the European Union. This document describes the methodology used for the production of ESG ratings and related products distributed globally under the LSEG brand. References to LSEG products, methodologies, governance frameworks and related disclosures reflect the global operating framework supporting those products and services. This methodology document forms part of the disclosure framework established to support compliance with the Regulation (EU) 2024/3005 and should be read together with the publicly available disclosure documents at: <https://www.lseg.com/en/data-analytics/sustainable-finance/regulatory-disclosures>.

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| | Annex III 1. j | | Information on whether the rating is expressed in absolute or relative value. | Fund scores are expressed on an absolute scale from 0 to 5, where higher scores indicate stronger ESG characteristics relative to the methodology framework. | Section 1 Methodology Overview, page 4 |
| | Annex III 1.o, Annex III 1.p | Article 3(3) | If an ESG rating of a rated item covers the E factor, information on whether that rating takes into account the targets and objectives of the Paris Agreement or any other relevant international agreements. | LSEG Fund ESG Scores are not meant to describe or act as statements of climate alignment (Paris Agreement). | Sub-section 1.6 Scope Limitations, page 5 |
| | | | (a) Include an indication of whether the rating takes into account the targets and objectives of the Paris Agreement and which other international agreements are taken into account, with reference to basic identifying information on these agreements together with an explanation of their relevance to the rating; (b) Specify whether the rating is benchmarking commitments against the objectives of those agreements. | | |
| Basic Methodological Disclosures | Annex III.1.a | Article 4(1) | An overview of the rating methodologies used and changes thereto, including whether analysis is backward-looking or forward-looking and the time horizon covered. | The scoring routine is dynamic and a continuous part of Lipper portfolio processing. This means that Lipper receives the month end portfolio, conducts general portfolio quality assessment checks, processes the LSEG ESG Fund Score and sends the information out to products on the public date. Scores will only be available in products on or after the 'Public Date', the date where Lipper is permitted by fund management companies to release certain types of sensitive portfolio data. The 'Public Date' is stored on the system and represents a lag between the portfolio 'reporting date' and the date at which information may be published. | Sub-section 1.1 Scores Calculation Routine, page 7 Sub-section 2.4 Model Coverage, page 11 |
| | | | (a) the title of the rating methodology used; | LSEG ESG Fund Scores | |
| | | | (b) a description of the types of rated items in relation to which the methodology referred to in point (a) applies | The methodology uses the underlying LSEG ESG Scores assigned at issuer level and combines them using the relative weight of each security within the fund, based on its proportion of the fund's Total Net Assets (TNA). The resulting fund-level scores therefore reflect the ESG profile, sustainability-related risks and sustainability-related impacts of the underlying portfolio at a point in time. | Section 1 Methodology Overview, page 4 |
| | | | (c) the time horizon over which the ESG rating is considered valid, where applicable | We will use the latest fiscal year end for company scores data which is aligned most closely with the fund's reporting date to take the snapshot. This means the latest LSEG ESG company score available for each security in the portfolio that is equal to or older than the portfolio, up to a maximum of 3 years old. | Sub-section 1.1 Scores Calculation Routine, page 7 |
| | | | (d) a list and overview of the relevant supporting models and key rating assumptions, where applicable; information on measures and procedures to ensure the quality and reliability of data used; | The methodology uses the underlying LSEG ESG Scores assigned at issuer level and combines them using the relative weight of each security within the fund, based on its proportion of the fund's Total Net Assets (TNA). The resulting fund-level scores therefore reflect the ESG profile, sustainability-related risks and sustainability-related impacts of the underlying portfolio at a point in time. The methodology does not introduce new indicators, new weighting systems, or thematic reinterpretations at the fund level. Instead, it preserves and faithfully applies dependencies, and constructions of the LSEG ESG Scores company model. | Section 1 Methodology Overview, page 4 |
| | | | (e) a description of the defined ranking system of rating categories used, with reference to: | Refer to the LSEG ESG Scores methodology available on the LSEG website for further details. | Refer to LSEG ESG Scores Methodology document. |
| | | | i. the meaning of each rating category for absolute and relative values and how the ranking system should be interpreted; | Fund ESG Scores use the 0–5 absolute scale, identical to issuer-level scoring. A high fund score indicates that the assets held (weighted by TNA) primarily have strong ESG management and performance across Themes and Pillars. The exception to the scoring scale below is the 'Controversies Score', as part of LSEG ESG Scores PLUS whereby companies that score 5 have the largest controversies (relative to others) and the highest risk. | Section 1 Methodology Overview, page 4 |
| | ii. in the case of relative values, an explanation as to whether they are relative to a specific industry, geographical area, peer groups or other comparative references and their respective description | | | | |
| | | (f) the dates of the most recent update of the methodology and a description of the changes introduced to the previous version. | Effective Date 1st July 2026; Version 1.0 | Model Change Log - Version Control Table, page 2 | |
| | | Annex III.1.b | Article 4(2) | The industry classification used. | |
| (a) The name of the issuing body for the industry classification used. | | | | LSEG | |
| (b) The name and version of the industry classification used. | | | | The LSEG Business Classification (TRBC - The Refinitiv Business Classification) | Section 1 Methodology Overview, page 4 |
| | (c) Any publicly available link to the official documentation of the industry classification system, if available. | TBRC Sector Classification | | | |
| | | | An overview of data sources, including whether data is sourced from sustainability statements required under Directive 2013/34/EU or from information disclosed under Regulation (EU) 2019/2088 and whether sources are public or non-public, and an overview of data processes, estimation of input data in case of unavailability and frequency of data updates. | | |

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| | Annex III.1.c | Article 4(3) | (a) An overview of data sources, including whether data is sourced from sustainability statements, and whether sources are public or non-public; overview of data processes, estimation of input data in case of unavailability and frequency of data updates. | LSEG collects and calculates over 870 company-level ESG measures, of which a subset of 221 are used to drive the ESG scoring process. These indicators have been chosen to provide a comprehensive overview of a company's internal operations from an ESG perspective, while also being comparable and material per industry (details in the ESG glossary, available on request). Data for the model is obtained from corporate reports such as Annual or Integrated Reporting, specific Corporate Sustainability Reports, press releases, corporate websites and CDP (Carbon Disclosure Project) data. Estimated data and non-public information are generally not used in ESG Fund Scores. Exceptions are limited to methodology-defined derivations including: <ul style="list-style-type: none"> • Partial or indicative company data as described in the LSEG ESG Scores methodology • Green Revenue estimates where direct company disclosure is unavailable • Parent company proxy scoring where no company score is available No sustainability statements required under CSRD, SFDR and EU taxonomy are used as a source. For the LSEG ESG Scores Plus model, data sources are related to green bond issuance by companies, revenues generated from green activities, sovereign ESG risk exposure for companies, as well as news controversies. | Section 2 - Data Collection Process, page 11 |
| | | | (b) A description of the engagement process with rated items or issuers of these items, including how the input from such engagement is considered. | Refer to ESG Data Management Policy Statement available via LSEG's Regulatory Disclosures Website. | Refer to ESG Ratings Data Management Policy Statement document. |
| | Annex III.1.e | Article 4(4) | Information on whether and how the rating methodologies are based on scientific evidence Where applicable, describe the process for identifying relevant scientific evidence. | N/A scientific evidence is not used in the model methodology. | N/A |
| | Annex III.1.k | N/A | Where applicable, reference to the use of artificial intelligence in the data collection or rating process including information about current limitations and risks of using artificial intelligence. | AI tools are used to support the extraction, standardization, and validation of portfolio holdings data from structured, semi-structured, and scanned PDF reports. AI-assisted processes (e.g., via Excel-based tools) map extracted data to a standard schema and apply automated validation checks, including ISIN format verification, portfolio weight completeness, currency consistency, and detection of missing or duplicate records. AI (NLP/ML) is used in a semi-automated manner at the data collection stage, which provides recommendations. However, all outputs are subject to data specialist review and validation before data is entered into the collection system. There is no analyst discretion, all reviews are based on the policy and rules defined for collection of each data metric. There is no straight through processing (STP) for ESG data collection using AI. The SFI tool provides recommended extract from public disclosures relevant to a given data metric, with a human reviewer making the final selection. The score calculation/rating process is algorithmic and does not use AI. The methodology is also not based on external scientific models or assumptions but relies on structured assessment of disclosed information. | Sub-section 2.3 Use of Artificial Intelligence (AI) in Data Collection and Rating Process, page 11 |
| Limitations in data sources, methodologies and information | Annex III 1.m, Annex III 1.q | Article 5 | Any limitation in data sources and methodologies used for the construction of ESG ratings. Any limitation on the information available to ESG rating providers. | Limitations in both corporate level and portfolio level data is described in section 'Data Limitations' | Section 4 Data Limitations, page 14 |
| | | | (a) the availability or consistency of data used in the rating process; | | |
| | | | (b) the completeness, timeliness and accuracy of information; | | |
| (c) the use of assumptions, proxy reference points and data estimation. | Estimated data and non-public information are generally not used in ESG Fund Scores. Exceptions are limited to methodology-defined derivations including partial or indicative company data as described in the LSEG ESG Scores methodology, green revenue estimates where direct company disclosure is unavailable, and parent company proxy scoring where no company score is available. | Sub-section 2.1 Corporate ESG Data, page 11 | | | |
| Organisational | Annex III.1.d | Article 6(1) | The ownership structure of the ESG rating provider. | Refer to ESG Ratings Organisational Structure Statement available via LSEG's Regulatory Disclosures Website. | Refer to ESG Ratings Organisational Structure Statement document. |
| | Annex III.1.i | Article 6(2) | General information on criteria used for establishing fees charged to clients, specifying the various elements taken into consideration, and general information on the business/payment model. | Refer to ESG Ratings Pricing Framework available via LSEG's Regulatory Disclosures Website. | Refer to ESG Ratings Pricing Framework document. |
| | Annex III.1.n | Article 6(3) | The main risks of conflicts of interest and the steps taken to mitigate them. | Refer to Conflicts of Interest Policy Statement available via LSEG's Regulatory Disclosures Website. | Refer to Conflicts of Interest Policy Statement document. |

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