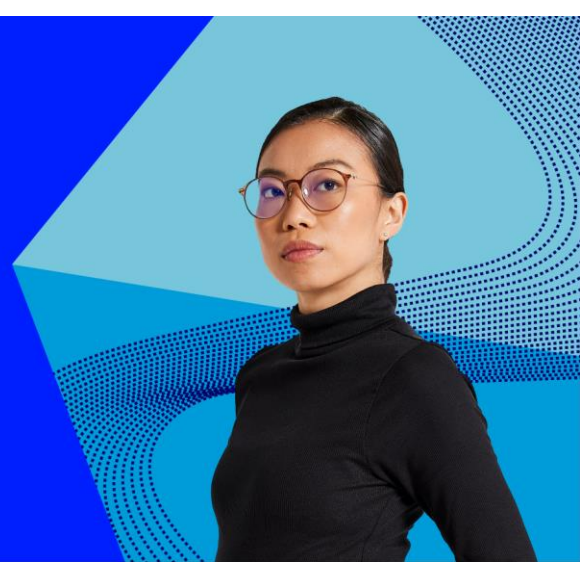


July 2026

Data Management Policy Statement

LSEG ESG Rating Provider



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 forms part of the governance and disclosure framework supporting ESG ratings and related products distributed 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 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>.

The use of the LSEG brand in this document is for branding purposes only and does not affect, modify or supersede the identification of the ESG Rating Provider for the purposes of Regulation (EU) 2024/3005.

Objective

This policy describes the principles and governance arrangements applied by LSEG to the collection, validation, maintenance, corporate engagement and distribution of ESG, Climate and supporting data ("ESG data") used in ESG ratings and related products in scope of the regulation.

Data Governance Under Data Trust

LSEG manages ESG data through its Data Trust framework, which comprises five core components:

- **Sourcing** – collect data from approved, attributable sources and capture provenance and usage rights where appropriate.
- **Data Quality** – apply embedded automated validations, manual review and post-production controls before release of in scope scores.
- **Normalising & Mastering** – data metrics are captured from publicly available source documents, stored in a database of record and normalised into industry standard formats.
- **Concordance / Enrichment** – link content with consistent metadata and identifiers for use across products.
- **Distribution** – release only approved ESG data through governed channels with entitlement and audit controls.

Governance is operated through clear first-line ownership, second-line compliance oversight and third-line audit assurance. Lineage, rights management, evidence of review and change records must be maintained for all material outputs.

Data Collection, Updates and Historical Revision

ESG data is collected using controlled workflows supported by automated validations and manual review processes. Information is sourced primarily from publicly available corporate disclosures, information submitted through the LSEG Contributions Channel that is supported by publicly available disclosures, and approved third-party sources, including the Carbon Disclosure Project (CDP), where relevant.

Data sources are monitored regularly for new or updated disclosures. ESG data is maintained on a continuous basis and published through LSEG products in accordance with established publication cycles.

Underlying data may be updated where companies publish new information, correct previously disclosed information or provide clarifications supported by public disclosures. Historical records of data revisions are maintained in accordance with applicable record retention requirements.

Methodology and data changes are governed in accordance with the LSEG Methodology Review & Change Management Policy available on the [LSEG website](#). Where required, material changes are subject to impact assessment, governance approval and customer communication.

LSEG maintains the records necessary to support the reproducibility of ESG ratings for a minimum period of five years.

Data Quality

LSEG applies a data quality framework designed to support the accuracy, completeness, consistency and timeliness of ESG data throughout its lifecycle.

Data is subject to automated validation, manual review and post-production quality assurance processes designed to identify potential anomalies, inconsistencies or missing information. Where potential issues are identified, they are investigated, validated against publicly available sources and, where appropriate, corrected at source before being reflected in downstream ESG ratings through the standard recalculation process.

Quality assurance processes are periodically reviewed and enhanced to support the continued integrity and reliability of ESG data.

Engagement with Rated Entities

Newly rated entities are notified no later than two working days before the initial publication of their ESG ratings in accordance with applicable regulatory requirements.

Rated entities may review the underlying ESG data and supporting source information through the [LSEG Contributions Channel](#) and may submit factual corrections or clarifications supported by publicly available disclosures. All submissions are subject to validation before any changes are incorporated into LSEG datasets.

For sovereign ESG ratings, the relevant sovereign authority is notified no later than two working days before the initial publication of its ESG rating. Following notification, any questions or factual clarifications relating to the underlying data may be submitted through the dedicated contact email address: sovereignsolutions@lseg.com

Further information regarding corporate engagement, complaints and reasoned concerns is available in the relevant public policy statements published on the LSEG website

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