

## 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 Providers<sup>1</sup> 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](mailto: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 paper<sup>2</sup>, 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:	
<b>Name of Provider (Please indicate)</b>	London Stock Exchange Group (LSEG)
<b>Type of Provider (Please select one)</b>	ESG Rating and Data Product Provider
<b>Company Name of the Independent External Assessor</b>	N/A
<b>Date of Assessment</b>	N/A
<b>Remarks by Assessor, if any</b>	N/A

<sup>1</sup> 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.



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


## Checklist for Singapore Code of Conduct for ESG Rating and Data Product Providers

**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><b>If Yes, please disclose how this is complied with.</b>  <i>E.g. provide links to relevant policies and procedures.</i></p> <p><b>If No, please explain.</b>  <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><b><u>Best Practice 1:</u></b></p> <p><b>1. The ESG Rating and Data Product Provider should:</b></p>				
<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;</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>LSEG's businesses have established policies and procedures and relevant training materials across teams responsible for data collection, quality controlling, model management and distribution to ensure high standards of data accuracy and integrity.</p> <p>LSEG ESG scores, FTSE Russell ESG scores, Green Revenues, LSEG EU Taxonomy and Sovereign Sustainability Solutions (ESG Factor in, Sovereign Climate KPI and LSEG Sovereign Risk Monitor) are based on publicly available information, whereby actual reported data is collected, storing the audit trail to the source documents and is subject to thorough and robust internal controls to ensure high quality and auditability for each product.</p>

<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;</p>		<input type="checkbox"/>	<input type="checkbox"/>	<p>Transparency is central to ESG data collection, verification and scoring methodologies across LSEG. Product overviews, methodology and calculation details are publicly available through the LSEG website. Because the products use an approach that is data and rule-based driven, with transparent aggregation rules, it enables a higher degree of transparency over alternative approaches that require analyst judgement.</p>
<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;</p>		<input type="checkbox"/>	<input type="checkbox"/>	<p>Our team of over 700 content analysts and quality controllers follow standardised procedures and are enabled through technology and tools to capture in a timely manner ESG data that is accurate, transparent and comparable across the entire range of companies in our coverage. Collected data is subject to manual audits and automated pre- and post-production quality checks for both ESG Scores and datasets. LSEG ESG Scores are also subject to daily sample audits and regular reviews to address the accuracy and integrity of the data. To ensure data is current, the database is updated on a continuous basis based on corporate reporting, controversy news and corporate actions. Similarly, FTSE Russell ESG Scores follow a standardised approach to data collection whereby publicly available information is captured for each company across each research cycle. Throughout the data collection and calculation process, FTSE Russell applies several layers of quality control to ensure data accuracy. Checks are applied at the company and overall dataset levels. Details of the collection and calculation processes and controls are available in <a href="https://lseg.com/FTSE-Russell-ESG-Data-Model-Methodology">FTSE Russell ESG Data Model Methodology (lseg.com)</a>.</p>

<p>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;</p>		<input type="checkbox"/>	<input type="checkbox"/>	<p>Methodologies are subject to regular review to ensure that they continue to meet the current and future requirements. Be that as it may, changes to our scoring methodology are implemented cautiously and infrequently, with the aim of maintaining stability and minimizing disruption to the users of the data. The information gathering process for LSEG ESG Scores, FTSE Russell ESG Scores and the datasets are regularly discussed and reviewed through the respective governance processes. This includes discussions of any issues with the process or methods of collection of data, complaints received and potential areas for improvement, identified internally or externally.</p> <p>The LSEG ESG Scores, EU Taxonomy, Green Revenues dataset and Sovereign Sustainability Solutions are governed through the Sustainable Finance and Investment (“SFI”) Regulatory Governance Committee (“SRGC”). The SRGC oversees the application, development and changes to SFI products and reviews all regulatory-aligned methodologies and policies related to LSEG ESG Scores. It also monitors and implements new regulatory requirements and industry standards. The forum is comprised of representatives from all areas of the business involved in the administration of LSEG ESG Scores, including individuals identified as having key roles and responsibilities within the SFI business, Risk and Compliance. The SFI business is also governed by a Product and Commercial Board (PCB) that provides commercial and product-related decision-making capabilities to ensure that product launches and commercial policies lead to successful outcomes and better products.</p> <p>FTSE Russell ESG Scores are governed through FTSE Russell’s Governance Framework, which includes input from the FTSE Russell Sustainable Investment</p>
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				Advisory Committee, an external committee comprised of market practitioners and stakeholders. Additional information on these forums, including a summary of Terms of Reference and key roles and responsibilities, is available through the <a href="#">Governance Framework document</a> .
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 type="checkbox"/>	<input type="checkbox"/>	<p>For LSEG ESG Scores, the Environmental, social and governance scores from LSEG, <a href="https://www.lseg.com/content/dam/data-analytics/en_us/documents/methodology/lseg-esg-scores-methodology.pdf">https://www.lseg.com/content/dam/data-analytics/en_us/documents/methodology/lseg-esg-scores-methodology.pdf</a>, describes details of the data collection process and how Scores are calculated, including the structure and composition of Scores, factors and information considered for Scores, how underlying data is treated and weighed, and example data to ensure full transparency and understanding for users and stakeholders. A link is provided for additional queries. An illustration of final ESG Score calculations is also available for download within the document, it describes details of the data collection process and how scores are calculated, including the structure and composition of scores, factors and information considered for scores, how underlying data is treated and weighed, and example data to ensure full transparency and understanding for users and stakeholders.</p> <p>For FTSE Russell ESG Scores, the <a href="#">FTSE Russell ESG Data Model Methodology (lseg.com)</a> describes the data assessment process, models for ESG scores and underlying ESG data, and controls. It also provides details about the score calculation process, including Theme exposure, Pillar scores and overall ESG score as well as case study examples, and a list of data sources to ensure transparency and understanding for users and stakeholders. Links are provided for additional queries and a glossary of terms is included. Additionally,</p>

				<p>FTSE Russell provides an FAQ Document that addresses common questions for the ESG assessment and scoring process.</p> <p>For the Sovereign Sustainability Solutions datasets (<a href="#">ESG Factor in</a>, <a href="#">Sovereign Climate KPI</a>, <a href="#">Sovereign Risk Methodology</a>), <a href="#">Green Revenues</a> and <a href="#">EU taxonomy</a>, the publicly available methodologies describe the data assessment process, including the structure and composition of the datasets, the treatment of the underlying data.</p>
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 – reviewing, on a regular basis, the ESG rating of the rated entity;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>For the LSEG ESG Scores, the database is updated on a continuous basis – aligned with corporate reporting patterns – and data is refreshed on products every week, including the recalculation of the ESG scores.</p> <p>All LSEG ESG scores, including controversies scores, are updated on a weekly basis.</p> <p>For the FTSE Russell ESG scores, companies are assessed once a year within each research cycle, which runs from June to the following March.</p> <p>For the Sovereign Sustainability solutions datasets, the data is updated on a quarterly basis (LSEG Sovereign Risk Monitor); twice a year in August and February (Climate KPIs), and on annual basis (ESG Factor-In).</p> <p>For EU taxonomy, the input data is refreshed weekly; whilst Green Revenues is updated on rolling annual basis.</p>
<ul style="list-style-type: none"> <li>(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</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>LSEG ESG scores and FTSE Russell's ESG scores follow robust methodologies that do not involve analyst discretion. For this reason, no ad-hoc reviews are triggered. Any public information that is relevant for the calculation of the scores will be captured by the methodology and applied in the next review cycle.</p>

<p>the rating methodology; and</p> <ul style="list-style-type: none"> <li>(Singapore) updating on a timely basis the ESG rating, as appropriate, based on the results of such review;</li> </ul>				
<p>g. maintain records to support every ESG rating and data products that it issues.</p>	■	<input type="checkbox"/>	<input type="checkbox"/>	<p>LSEG maintains the records to support the ESG rating and the data products that it issues; the data is stored in a secure database.</p>
<p>(Singapore) Such records can be kept for at least 6 years from the issue date of the relevant ESG rating and data products;</p>	■	<input type="checkbox"/>	<input type="checkbox"/>	<p>In accordance with LSEG's Group data retention policy, the records are retained for 6 years from the issue date for the aforementioned ESG scores and datasets.</p>
<p>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;</p>	■	<input type="checkbox"/>	<input type="checkbox"/>	<p>LSEG operates effective recruitment and onboarding processes to identify and recruit top talent across all businesses. In line with LSEG's HR framework, employees are subject to continuous professional training and assessment to foster development and high-performance standards in their roles. In addition to administering internal certifications for ESG data specialists, colleagues are also supported in pursuing external industry-recognised certifications.</p>
<p>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 assurance (e.g.</p>	■	<input type="checkbox"/>	<input type="checkbox"/>	<p>At the staff level, LSEG operates effective recruitment and onboarding processes to identify and recruit top talent across all businesses. In line with LSEG's HR framework, employees are subject to continuous professional training and assessment to foster development and high-performance standards in their roles. In addition to administering internal</p>

verification of data).				certifications for ESG data specialists, colleagues are also supported in pursuing external industry-recognised certifications.
(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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ESG specialists at LSEG undergo extensive classroom and on-the-job training under close supervision and guidance from subject matter experts. This involves significant technology training as new systems are developed and implemented. The quality of work and performance of ESG specialists are regularly assessed with ongoing management feedback, in line with the LSEG's HR framework. LSEG's data collection team operates an evaluation system established to nurture LSEG's high-quality data and ensure LSEG's rules-based methodologies are followed.
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"/>	LSEG can confirm that it provides the ESG Rating and data products to clients in machine-readable format.
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	LSEG does not give any assurance or guarantee of any ESG rating prior to the ESG rating assessment. Data used to calculate the LSEG ESG scores, and FTSE Russell ESG scores is gathered from publicly available sources at the entity level, including corporate reports, websites and press releases.



**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.*

<b>Best Practice 2:</b>  <b>2. The ESG Rating and Data Product Provider should:</b>	Complied?			<b>If Yes, please disclose how this is complied with.</b> <i>E.g. provide links to relevant disclosures.</i>  <b>If No, please explain.</b> <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"/>	To manage conflicts of interest and establish appropriate control measures across the LSEG, all businesses follow the LSEG Global Conflicts of Interest Policy which sets out the criteria and key requirements for identification, reporting and management of conflicts of interest.
(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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SFI and FTSE Russell have developed business-level conflicts of interest registers, which include coverage of ESG scores. This is in line with LSEG policies, to capture potential and actual conflicts of interest and implement any necessary mitigating measures. The identified conflicts and mitigating measures are periodically reviewed as part of the governance processes within SFI and FTSE Russell.

b. disclose its conflicts identification and management measures;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	LSEG have developed business-level conflicts of interest registers, which include coverage of ESG scores and the datasets. The methodologies refer to how identified conflicts and mitigating measures are periodically reviewed as part of the governance processes covering the ESG scores and the datasets.
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"/>	Employees involved in data collection and calculation of ESG scores operate independently from sales functions and are not incentivised by fees charged to clients or revenue from ESG score subscriptions.
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"/>	LSEG staff are also subject to the <a href="#">LSEG Code of Conduct</a> and LSEG policies for dealing in securities, which require employees to disclose their holdings and seek pre-approval prior to trading in securities. Potential personal conflicts, such as roles outside LSEG and close personal relationships relevant to an employee's role, are required to be disclosed in a centralised compliance system.  Annually, LSEG employees must attest that they have followed LSEG policies and disclosed all potential conflicts of interest.
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"/>	All actual and potential conflicts of interests are reviewed by the relevant stakeholders involved in the management of a conflict-of-interest process, and can include multiple members of LSEG's Compliance team, and in most cases, also the employee's line manager.

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"/>	Employees involved in data collection and calculation of ESG scores operate independently from sales functions and are not incentivised by fees charged to clients or revenue from ESG product's subscriptions.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
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"/>	LSEG operates an "investor pays" model, where investors (and other clients) can purchase ESG scores covering over 15,000 companies globally. The clients are therefore investors and users of those scores rather than the companies being scored.

**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?			<p><b>If Yes, please disclose how this is complied with.</b> <i>E.g. provide links to relevant disclosures.</i></p> <p><b>If No, please explain.</b> <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><b>Best Practice 4:</b></p> <p><b>4. The ESG Rating and Data Product Provider should:</b></p>				

a. make adequate levels of public disclosure and transparency a priority for its ESG rating and data products, subject to commercial sensitivity considerations;	■	<input type="checkbox"/>	<input type="checkbox"/>	Transparency is central to ESG data collection, verification and scoring methodologies across LSEG.
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;	■	<input type="checkbox"/>	<input type="checkbox"/>	Product overviews, methodology and calculation details are publicly available through the LSEG website. Because LSEG uses an approach that is data and rule-based driven, with transparent aggregation rules to provide numerical scores, it enables a higher degree of transparency over alternative approaches seen in the market that require analyst judgement.
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);	■	<input type="checkbox"/>	<input type="checkbox"/>	Data used in ESG scoring is sourced only from publicly available sources, such as annual reports, corporate social responsibility reports and data from stock exchanges or corporate websites. The details are described in the publicly available methodology documents.
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 type="checkbox"/>	<input type="checkbox"/>	<p>For LSEG ESG scores, the <a href="#">Environmental, social and governance scores from LSEG</a>, a document which is publicly available via the LSEG website, describes details of the data collection process and how scores are calculated, for users and stakeholders.</p> <p>For FTSE Russell ESG Scores, the <a href="#">FTSE Russell ESG Data Model Methodology (lseg.com)</a> describes the data assessment process, models for ESG scores and underlying ESG data, and controls. It also provides details about the score calculation process.</p> <p>For the Sovereign Sustainability Solutions datasets (<a href="#">ESG Factor in</a>, <a href="#">Sovereign Climate</a></p>

				<a href="#">KPI</a> , <a href="#">Sovereign Risk Methodology</a> ), <a href="#">Green Revenues</a> and <a href="#">EU taxonomy</a> , the publicly available methodologies describe the data assessment process, including the structure and composition of the datasets, the treatment of the underlying data.
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<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"> <li>• the measurement objective of the ESG rating and data products;</li> <li>• the criteria used to assess the covered entity;</li> <li>• the Key Performance Indicators used to assess the covered entity against each criterion;</li> <li>• the relative weighting of these criteria to that assessment;</li> <li>• the scope of business activities and group entities included in the assessment;</li> <li>• the principal sources of qualitative and quantitative information used in the assessment as well as information on how the absence of information was treated;</li> <li>• the time horizon of the assessment;</li> <li>• the meaning of each assessment category (where relevant);</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>For LSEG ESG scores, the <a href="#">Environmental, social and governance scores from LSEG</a>, a document which is publicly available via the LSEG website, describes details of the data collection process and how Scores are calculated, including the structure and composition of scores, factors and information considered for scores, how underlying data is treated and weighed, and example data to ensure full transparency and understanding for users and stakeholders. A link is provided for additional queries. An illustration of final ESG Score calculations is also available for download within the document.</p> <p>For FTSE Russell ESG scores, the <a href="#">FTSE Russell ESG Data Model Methodology (lseg.com)</a> describes the data assessment process, models for ESG Scores and underlying ESG data, and controls. It also provides details about the score calculation process, including Theme exposure, Pillar scores and overall ESG score, case study examples, and a list of data sources to ensure transparency and understanding for users and stakeholders. Links are provided for additional queries and a glossary of terms is included. Additionally, FTSE Russell provides an <a href="#">FAQ Document</a> that addresses common questions for the ESG assessment and scoring process.</p> <p>For the Sovereign Sustainability Solutions datasets (<a href="#">ESG Factor in</a>, <a href="#">Sovereign Climate KPI</a>, <a href="#">Sovereign Risk Methodology</a>), <a href="#">Green</a></p>
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				<p><a href="#">Revenues</a> and <a href="#">EU taxonomy</a>, the publicly available methodologies describe the data assessment process, including the structure and composition of the datasets, the treatment of the underlying data.</p>
<ul style="list-style-type: none"> <li>• (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</li> <li>• (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.</li> </ul>	■	<input type="checkbox"/>	<input type="checkbox"/>	<p>LSEG ESG scores and FTSE Russell ESG scores assess both the impact of the covered entities and its risk exposure to ESG related issues. Information on the indicators that are used for its calculation is made available in the publicly available methodology documents.</p> <p>The Sovereign Sustainability solutions, Green Revenues, EU Taxonomy focus primarily on impact.</p>

**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.*

<b>Best Practice 5:</b>  <b>5A. The ESG Rating and Data Product Provider should:</b>	Complied?			<b>If Yes, please disclose how this is complied with.</b> <i>E.g. provide links to relevant disclosures.</i>  <b>If No, please explain.</b> <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 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"/>	LSEG maintains a Data Policy, developed in line with international recommendations, which sets out the principles and standards for data governance and management, and a Confidentiality Policy, which sets out the key requirements for handling confidential information received from internal and external sources. Any potential policy breaches are reported and investigated, in line with internal processes and procedures.
(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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Any information received from companies pertaining to ESG Scores will not be shared externally or considered for ESG Scores unless the information is first made publicly available. All LSEG clients and contributors have agreements that contain confidentiality clauses.

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 type="checkbox"/>	<input type="checkbox"/>	Data used in ESG scoring is sourced only from publicly available sources, such as annual reports, corporate social responsibility reports and data from stock exchanges or corporate websites. Data collection specialists within SFI and FTSE Russell are appropriately trained in data sourcing and handling. Any information received from companies pertaining to ESG scores will not be shared externally or considered for ESG Scores unless the information is first made publicly available.
c. include information on data confidentiality management and on the protection of non-public information to the extent terms of engagement are published.	■	<input type="checkbox"/>	<input type="checkbox"/>	All the data used in the calculation of the ESG scores and datasets are sourced only from publicly available sources, such as annual reports, corporate social responsibility reports and data from stock exchanges or corporate websites; this is clearly defined in the respective methodologies.
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"/>	■	LSEG operates an “investor-pays” model, where investors (and other clients) can purchase ESG scores covering over 15,000 companies globally. The clients are therefore investors and users of those scores rather than the companies being scored.

**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.*



<b>Best Practice 6:</b>  <b>6. Where the ESG Rating and Data Product Provider collects information from covered entity on a bilateral basis, or through questionnaires, it should consider:</b>	Complied?			<b>If Yes, please disclose how this is complied with.</b> <i>E.g. provide links to relevant disclosures.</i>  <b>If No, please explain.</b>  <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. communicating sufficiently in advance when it expects to request information for the purposes of preparing the ESG rating and data products; and	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All information used for the ESG scores and datasets are sourced from public information and/or LSEG propriety data.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All information used for the ESG scores and datasets are sourced from public information and/or LSEG propriety data.

<b>Best Practice 7:</b>  <b>7. The ESG Rating and Data Product Provider should:</b>	Complied?			<b>If Yes, please disclose how this is complied with.</b> <i>E.g. provide links to relevant disclosures.</i>  <b>If No, please explain.</b>  <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"/>	<p>For LSEG ESG Scores, Green Revenues, Sovereign Sustainability Solutions, and EU Taxonomy, a dedicated customer support team is available for clients to raise any ESG data-related enquiries and challenges.</p> <p>For FTSE Russell ESG Scores, a dedicated client service desk provides Subject Matter Expert services in multiple languages, and meetings are available for companies upon request. Companies are also provided the opportunity to challenge potential ESG data inaccuracies and submit complaints or amendments in line with the <a href="#">Sustainable</a></p>

				<a href="#">Investment Data Recalculation Policy and Guidelines.</a>
<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>	■	<input type="checkbox"/>	<input type="checkbox"/>	For the LSEG ESG scores and FTSE Russell ESG scores, the methodology documents which are publicly available, describe in detail how the scores are calculated, including the structure and composition of scores, factors and information considered for calculation, how underlying data is treated and weighed, and example data to ensure full transparency and understanding for users and stakeholders.
<p>ii. ESG data product is based, before or after the publication of the ESG data product, where practicable;</p>				For Green Revenues, EU Taxonomy and the Sovereign Sustainability Solutions, the methodology documents which are publicly available, describe in detail how the datasets are calculated, including the structure and composition of the data.
<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 type="checkbox"/>	<input type="checkbox"/>	<p>For LSEG ESG Scores, companies subject to evaluation are also provided free access to the <a href="#">LSEG Contributions Channel</a> , where they can review and edit existing data, provide new data and add timely updates to ESG initiatives for investors and stakeholders. Companies are required to substantiate all data with reference to publicly disclosed sources and the edited or newly contributed data is reviewed via the established control processes described above</p> <p>For FTSE Russell ESG Scores, FTSE Russell's process of engagement with companies subject to evaluation is provided in the <a href="#">Corporate engagement within sustainable investment - Information for researched companies</a> document. The document outlines the structured engagement process, which is part of the standard operations for administering FTSE Russell ESG Scores. FTSE Russell strives to ensure companies understand how ESG Scores are calculated and then provides them with access to the Sustainable Investment Data Platform, which allows companies to</p>

				<p>review their Score and ESG data as part of the established “Company Review Process.” Company feedback is then considered prior to final assessment and publication of the ESG Score.</p> <p>For Green Revenues, Sovereign Sustainability solutions and EU Taxonomy, a dedicated customer support team is available for clients to raise any ESG data-related challenges</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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>For the ESG scores, the methodologies describe the process of engagement with the covered entities; it clearly outlines the structured engagement process, which is part of the standard operations for administering the LSEG ESG scores and FTSE Russell ESG scores. LSEG strives to ensure companies understand how ESG scores are calculated.</p>

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

<b>Company</b>	London Stock Exchange Group (LSEG)
<b>Name of Director</b>	John Walker-Robertson
<b>Date of Approval</b>	1 November 2025