ICE Climate Transition Risk Scores - Annex III.1 Disclosure Methodology: ICE CLIMATE - Version 1 - 10-2026

Regulatory Basis: Public Disclosure Requirements under Regulation (EU) 2024/3005, Annex III, Point 1

Regulatory Information

In accordance with Regulation (EU) 2024/3005 on the transparency and integrity of ESG rating activities, ICE Climate ensures that the information required under Point 1 of Annex III is disclosed in the order prescribed by Commission Delegated Regulation (EU) 2026/87. In fulfilling these disclosure requirements, ICE Climate may cross-reference information available on its website, including through hyperlinks or other appropriate technological means, in line with Article 2(2) of Commission Delegated Regulation (EU) 2026/87. This methodology document forms part of ICE Climate's regulatory disclosure framework and should be read together with the publicly available disclosure documents available at: https://www.ice.com/fixed-income-data-services/ice-climate-data-analytics/regulation

ICE Data Services Ireland Limited is part of Intercontinental Exchange (ICE)'s Fixed Income and Data Services segment. ICE Climate, also part of ICE's Fixed Income and Data Services, provides a comprehensive suite of climate data, analytics, and geospatial intelligence solutions to financial market participants globally. ICE Data Services Ireland Limited is the entity through which ICE Climate intends to establish its ESG ratings business within the European Union and apply for authorisation under Regulation (EU) 2024/3005 of the European Parliament and of the Council of 27 November 2024 on the transparency and integrity of Environmental, Social and Governance (ESG) rating activities Regulation (EU) 2024/3005 ("ESG Ratings Regulation") by 2 November 2026.

Ref	Annex 3 point 1, Regulation	Article, Delegated Regulation	Requirement	Disclosure
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	ICE Climate issues Transition Risk Scores assessing a rated entity's exposure to climate transition risks and climate impacts associated with greenhouse gas emissions and decarbonisation pathways.
			(a) a description of the risks covered, where the ESG rating is assessing risks;	ICE Climate Transition Risk Scores measure an entity's misalignment with the transition to a lower-carbon economy, which is a driver of transition-related financial risk. For Corporate issuers, they represent the Corporate's exposure to the shift towards a lower-carbon economy and how prepared it is for that shift. Emissions are used as the measure because companies with higher, less-reduced emissions are generally more exposed to transition drivers such as climate regulation, carbon pricing, and changes in technology and market demand. For Sovereign issuers, those risks are reflected in the greenhouse gas emissions generated within and consumed by its economy, and in the ambition of the decarbonisation commitments incorporated in the Network for Greening the Financial System (NGFS) Scenarios.
			(b) a description of the impacts covered, where the ESG rating is assessing impacts;	ICE Climate Transition Risk Scores assess GHG emission impacts on the environment and society. Corporates Current Carbon Intensity and Carbon Momentum Scores are derived from the company's own Scope 1, Scope 2 and Scope 3 greenhouse gas emissions and from the rate at which those emissions are being reduced. Sovereigns Emissions per Capita Score measures a sovereign's greenhouse gas emissions per capita, by production CO_2e and by consumption CO_2e. Those scores therefore measure the issuers' impact on the environment.
			(c) information on how the risk and impact materiality are taken into account according to the double materiality principle, where applicable;	ICE Climate's Transition Risk Scores address both dimensions of double materiality within the Environmental pillar: financial risks (Outside-In) and impact (Inside-Out). The two dimensions of materiality are not separately weighted or separately reported.
			(d) where the ESG rating is based on other materiality dimensions, a description of those dimensions.	ICE Climate Transition Risk Scores are not based on other materiality dimensions.
Rating product disclosures	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	ICE Climate issues Transition Risk Scores based on the Environmental (E) pillar assessing a rated entity's exposure to climate transition risks and climate-related impacts. The methodology does not aggregate E, S and G factors into a single ESG rating.
			(a) a description of what is covered under the E, S or G factors and which factors are aggregated, where applicable	Under the Environmental (E) factor, ICE Climate Transition Risk Scores cover: Corporate issuers: - Current Carbon Intensity Score - Carbon Momentum Score - Target Setting Score - Climate Transition Risk Score Sovereign issuers: - Emissions per Capita Impact Score - ITR Impact Score
			(b) a description of the specific issues that the ESG rating covers.	Corporates issuer Scores cover: - Current Carbon Intensity Score: Current greenhouse gas emissions performance, measured through absolute emissions or emissions intensity relative to peers, with disclosure quality incorporated into the assessment. - Carbon Momentum Score: Annualised historical rate of reduction in a company's emissions or emissions intensity, over a one-year and a five-year period. - Target Setting Score: Expected (forward-looking) alignment implied by a company's stated GHG reduction targets. Derived from the company's Implied Temperature Rise (ITR). - Climate Transition Risk Score: The equally weighted combination of the Current Carbon Intensity Score, Carbon Momentum Score, and Target Setting Score. Sovereigns issuer Scores cover: - Emissions per Capita Impact Score: Per-capita greenhouse gas emissions measured on both a production and consumption basis. - Implied Temperature Rise (ITR) Impact Score: The ambition of sovereign decarbonisation pledges, derived from Implied Temperature Rise (ITR).
Rating product disclosures	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;	ICE Climate Transition Risk Scores are not an aggregated ESG rating.
Rating product disclosures	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;	ICE Climate Transition Risk Scores are not designed to assess or report against the sustainability reporting standards developed pursuant to Article 29b of Directive 2013/34/EU (European Sustainability Reporting Standards (ESRS)). However, the ratings assess climate-related environmental factors that may overlap with topics reported under ESRS, including greenhouse gas emissions, emissions reduction targets, emissions intensity, and climate transition pathways.
Rating product disclosures	Annex III 1.j	N/A	Information on whether the rating is expressed in absolute or relative value;	Both relative and absolute scores are used. Corporate Climate Transition Risk Scores and Transition Subscores are relative scores, normalised against sector or industry-group peer cohorts and expressed on a 0–100 scale. Sovereign Climate Transition Risk Scores are relative scores assessed on a 0-1 scale.

Ref	Annex 3 point 1, Regulation	Article, Delegated Regulation	Requirement	Disclosure
Rating product disclosures	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; if an ESG rating of a rated item covers the S and G factors, information on whether that rating takes into account any relevant international agreements;	ICE Climate Transition Risk Scores are informed by scientific and technical evidence, including the Greenhouse Gas Protocol, NGFS Phase 5 climate Scenarios, climate-economics research, emissions accounting standards, peer-reviewed research, public disclosures, and public, academic and third-party datasets. The methodologies are not designed to assess alignment with, or progress towards, the targets or objectives of the Paris Agreement or any other international agreement. However, the methodologies incorporate information relevant to the transition to a lower-carbon economy, including company emissions reduction targets and NGFS climate Scenarios used in the derivation of Implied Temperature Rise (ITR) metrics. Relevant scientific evidence is identified and assessed by the ICE Climate research and modelling teams as part of methodology development, validation and periodic review.
			(a) disclose an indication of whether the ESG rating takes into account the targets and objectives of the Paris Agreement and which other international agreements are considered, with reference to basic identifying information on the international agreements, together with an explanation of the relevance to the ESG rating;	
			(b) specify whether the ESG rating is assessing alignment of commitments against the objectives of the international agreements referred to in point (a).	
General 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;	ICE Climate's Transition Risk methodology transforms greenhouse gas emissions data, emissions reduction targets, and decarbonisation pathways into transition risk scores. - For corporate issuers, the methodology evaluates emissions disclosure quality, current emissions performance, historical emissions reduction trends, and emissions reduction targets through Current Carbon Intensity, Carbon Momentum, and Target Setting Scores, which are aggregated into a Climate Transition Risk Score. Both backward-looking and forward-looking, the assessment combines current emissions, historical emissions trends, and expected emissions trajectories. Historical emissions analysis includes one-year and five-year trends, while forward-looking analysis incorporates emissions reduction targets and temperature outcomes extending to 2100. - For sovereign issuers, the methodology evaluates greenhouse gas emissions per capita and the ambition of decarbonisation pledges through Emissions per Capita Impact Scores and ITR Impact Scores. Both backward-looking and forward-looking, the country-specific assessments combine an annual emissions record from 2000 onwards with the forward pathways in the NGFS Scenarios.
			(a) disclose the title of the rating methodology used;	ICE Climate Transition Risk Scores Methodology
			(b) describe the types of rated item in relation to which the methodology referred to in point (a) applies;	Risk Scores are provided for the following products: - ICE Climate Risk Corporates - ICE Climate Sovereigns
			(c) disclose the time horizon over which the ESG rating is considered valid, where applicable;	Transition Risk Scores are considered valid until updated. Updates may be triggered by source data updates, methodology updates, model updates, climate scenario updates, or annual dataset refreshes.
			(d) disclose a list and overview of the relevant supporting models and key rating assumptions, where applicable;	ICE Climate Transition Risk Scores combine greenhouse gas emissions data, emissions reduction targets, and climate scenario analysis into a standardized transition risk assessment, by analysing: - Disclosure Quality: ICE Climate evaluates the completeness and quality of reported greenhouse gas emissions data and assigns disclosure classifications for Scope 1, Scope 2, and Scope 3 emissions. - Current Emissions Performance: ICE Climate assesses current absolute emissions and emissions intensity relative to peer companies and sectors, incorporating disclosure quality considerations where applicable. - Historical Emissions Performance: ICE Climate evaluates historical emissions reduction performance using one-year and five-year annualised reduction rates in emissions and emissions intensity. - Forward-Looking Transition Alignment: ICE Climate derives expected emissions trajectories and Implied Temperature Rise (ITR) metrics using issuer emissions reduction targets and NGFS Phase 5 climate scenarios. For sovereign issuers, ITR incorporates country emissions pathways represented within NGFS Phase 5 climate scenarios, which implicitly reflect Nationally Determined Contributions (NDCs). ICE Climate does not directly source or assess NDC pathways. Company disclosures may be supplemented through the Standard Median Model, which estimates missing emissions data using comparable peer groups. Underlying metrics are normalised against defined peer cohorts and combined into Transition Risk Scores. For corporate issuers, the Climate Transition Risk Score is calculated as the equally weighted combination of the Current Carbon Intensity Score, Carbon Momentum Score, and Target Setting Score. For sovereign issuers, Emissions per Capita Impact Scores and ITR Impact Scores assess emissions intensity and the ambition of decarbonisation pledges. Key assumptions include the use of peer-group emissions inference where disclosures are incomplete, linear emissions reductions towards stated targets, achievement of reported emissions reduction targets, application of NGFS Phase 5 climate scenarios for uncovered emissions pathways, and the assumption of an approximately linear relationship between cumulative emissions and global mean temperature increase. Further information available upon request.
			(e) provide information on measures and procedures to ensure the quality and reliability of data used;	ICE Climate's Transition Risk data are quality assessed internally by the ICE Reference Data Operations team, ICE Climate data scientists, and the ICE Climate Specialist Team. The data used and validation outcomes are traceable. A three layer-validation process applies to the reported emissions data on which the models are built and to the model outputs: - Daily: Predefined validation rules are run daily against the data warehouse. - Monthly: Audit of a sample of all completed validation actions. - Annually: An automated validation process runs across the entire dataset, triggering any outliers and generating a report of statistical anomalies. Further information available upon request.
			(f) describe the ranking system of rating categories used, with reference to:	Corporate Scores - Climate Transition Risk Score: 0-100 scale. A higher score indicates greater alignment with the transition to a lower-carbon economy relative to the applicable peer group.
			(i) the meaning of each rating category for absolute and relative values and how the ranking system is to be interpreted;	

Ref	Annex 3 point 1, Regulation	Article, Delegated Regulation	Requirement	Disclosure
General methodological disclosures	**Annex III 1.a**	**Article 4(1)**	(ii) in the case of relative values, an explanation on whether they are relative to a specific industry, geographical area, peer groups or other comparative references and the respective description of those relative values;	- Current Carbon Intensity Score: 0-100 scale. A higher score indicates better emissions performance relative to the applicable peer group. - Carbon Momentum Score: 0-100 scale. A higher score indicates stronger historical emissions reduction performance relative to the applicable peer group. - Target Setting Score: 0-100 scale. A higher score indicates greater alignment implied by the company's emissions reduction targets relative to the applicable peer group. Corporate scores are relative and determined solely by a company's position within the applicable normalisation cohort and are calculated using min-max scaling against: - ICE Entity Sector Normalisation (companies within the same ICE Entity Sector); or - ICE Entity Industry Group Normalisation (companies within the same ICE Entity Industry Group). Scores are normalised using the 5th and 95th percentile values of the cohort as the lower and upper bounds, with values outside those bounds capped at the ends of the scale. Sovereign Scores - Emissions per Capita Impact Score (Production CO_2e): 0-1 scale. A higher score indicates lower greenhouse gas emissions per capita. - Emissions per Capita Impact Score (Consumption CO_2e): 0-1 scale. A higher score indicates lower greenhouse gas emissions per capita. - ITR Impact Score: 0-1 scale. A higher score indicates more ambitious decarbonisation pledges and a lower implied temperature rise. Sovereign scores are rescaled across the scored sovereign universe. The Emissions per Capita Impact Scores are relative to the distribution of countries in each year and are recalculated annually. The ITR Impact Score is rescaled across all scored countries but remains fixed across years. In all sovereign scores, a higher score denotes greater alignment with the transition to a lower-carbon economy.
			(g) disclose the date of the most recent update of the methodology and a description of the changes introduced to the previous version.	ICE Climate Transition Risk Methodology was updated in October 2026 to include Sovereigns Transition Risk Scores.
General methodological disclosures	**Annex III 1.b**	**Article 4(2)**	The industry classification used;	ICE Climate uses the ICE Uniform Entity Sector Classification, a five-level taxonomy consisting of Sector, Sector Industry Group, Industry, Sub-Industry Group, and Sub-Industry. The classification is used throughout the Transition Risk methodology for Corporate issuers to define both normalisation cohorts and emissions inference cohorts. Corporates scores are assessed relative to peers using either the ICE Entity Sector or ICE Entity Industry Group normalisation cohort. This approach reflects that different sectors and industries face different emissions profiles, transition pathways, and decarbonisation challenges. Normalising within these peer groups allows companies to be compared against organisations with similar characteristics rather than against the entire corporate universe. The ICE Uniform Entity Sector Classification is also used in the emissions inference process, where companies are grouped into comparable sector and regional cohorts to estimate missing or incomplete emissions data. In addition, the classification supports the determination of material Scope 3 emissions categories at the industry level, helping ensure that industry-specific emissions risks are considered consistently across rated entities.
			(a) the name of the issuing body of the industry classification used;	The ICE Uniform Entity Sector Classification is issued by ICE.
			(b) the name and version of the industry classification used;	The ICE Uniform Entity Sector Classification is updated annually.
			(c) any publicly available link to the official documentation of the industry classification system.	ICE_Uniform_Entity_Sector_Methodology.pdf
General methodological disclosures	**Annex III 1.c**	**Article 4(3)**	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;	ICE Climate utilises company disclosures and external reference datasets to build Transition Risk Scores. Company greenhouse gas emissions data and emissions reduction targets are collected from annual reports, sustainability reports, regulatory filings, CDP responses, independent verification statements, and corporate websites. Where disclosure is absent or incomplete, emissions are inferred from the reported revenue intensity of a cohort of comparable directly analysed companies. Additional inputs include company financial and reference data. GHG datapoints may be sourced from sustainability statements required under Directive 2013/34/EU or from information disclosed under Regulation (EU) 2019/2088 through companies' sustainability reports. Sovereign Transition Risk Scores are derived entirely from public, open-source datasets. Emissions data is sourced from Climate Watch, the Global Carbon Project (GCP), and the Emissions Database for Global Atmospheric Research (EDGAR). Where not all three datasets are available for a year, values are inferred by regression. Economic and demographic indicators are sourced from public third-party datasets. Both the corporate and sovereign Transition Risk Scores are updated annually. Further information available upon request.
			ESG rating providers shall describe the engagement process with rated items or issuers of rated items, including how the input from such process is taken into account.	ICE Climate does not engage with rated items or issuers of rated items in the preparation of the Transition Risk Scores and does not perform on-site reviews or visits. Scores are prepared using publicly available data, licensed third-party data and ICE Climate proprietary models, as described herein. Rated items and issuers of rated items may request information about the data used in relation to them, and report suspected factual errors, by contacting ESGDataInquiry@ice.com.
General methodological disclosures	**Annex III 1.e**	**Article 4(4)**	Information on whether and how the rating methodologies are based on scientific evidence;	ICE Climate Transition Risk Scores are based on established greenhouse gas accounting frameworks, publicly disclosed greenhouse gas emissions data, and Network for Greening the Financial System (NGFS) Phase 5 climate scenarios. Relevant scientific evidence is identified through the review and incorporation of recognised greenhouse gas accounting frameworks, climate scenario frameworks, and emissions datasets, including the Greenhouse Gas Protocol, NGFS Phase 5 climate scenarios, Climate Watch, the Global Carbon Project (GCP), and the Emissions Database for Global Atmospheric Research (EDGAR). These scientific inputs are incorporated into the methodology to assess greenhouse gas emissions performance, transition risk, decarbonisation pathways, and Implied Temperature Rise (ITR) outcomes. Further information available upon request.
			ESG rating providers shall, where applicable, describe the process for identifying the relevant scientific evidence	

Ref	Annex 3 point 1, Regulation	Article, Delegated Regulation	Requirement	Disclosure
General methodological disclosures	**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;	ICE Climate uses automated and rule-based methodologies in the production of Transition Risk Scores. Any use of artificial intelligence within supporting operational processes does not alter the methodology or score derivation processes described in this document. ICE Climate uses a combination of automated extraction tools, including LLM-based document processing, and normalisation procedures in its data collection. Data collected with these tools is overseen by data collection staff prior to integration into our products. Extractions falling below an established confidence score threshold are subject to human review before inclusion.
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.	See below Further information available upon request.
			(a) the availability or consistency of data used in the rating process;	Data availability and consistency vary across issuers, sectors, geographies, and reporting periods. Corporate scores rely on publicly disclosed greenhouse gas emissions data, emissions reduction targets, and supporting financial and reference data, while sovereign scores rely on publicly available emissions, economic, and demographic datasets. Where disclosures or source data are absent or incomplete, standardised inference, reconciliation, and gap-filling methodologies are applied.
			(b) the completeness, timeliness and accuracy of information;	Data completeness, timeliness and accuracy depend on the availability of underlying greenhouse gas emissions disclosures, emissions reduction targets, and public source datasets, which vary across issuers, sectors, geographies, and reporting periods. These differences are reflected in factors such as incomplete corporate disclosures, and differences in methodologies across sovereign emissions datasets.
			(c) the use of assumptions, proxy reference points and data estimation.	ICE Climate Transition Risk Scores incorporate assumptions, proxies, and estimation techniques, including cohort-based emissions inference where corporate disclosures are absent or incomplete, revenue-based emissions estimation, sector and industry peer-group reference points, Scope 3 materiality assessments, and regression-based estimation for missing sovereign emissions data. Additional assumptions are applied in emissions trajectory and Implied Temperature Rise (ITR) calculations, including the use of NGFS Phase 5 climate scenarios, linear emissions reduction pathways, achievement of reported emissions reduction targets, and population-based proxies where sovereign data is unavailable.
Organisational disclosures	**Annex III 1.d**	**Article 6(1)**	The ownership structure of the ESG rating provider; (a) ESG rating providers shall disclose a chart illustrating their ownership links with any parent undertaking and subsidiaries. That chart shall indicate, where applicable, whether any of those entities perform any of the activities listed in Article 16(1) or other services as referred to in Article 16(6) of Regulation (EU) 2024/3005	Refer to the Organisational Structure / Org chart section, available at https://www.ice.com/fixed-income-data-services/ice-climate-data-analytics/regulation
Organisational disclosures	**Annex III 1.l**	**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; (a) how the criteria they apply for establishing fees ensure that those fees are fair, reasonable, transparent and non discriminatory, as required by Article 27 of Regulation (EU) 2024/3005; (b) whether the ESG rating provider operates a subscription-paid model, an issuer-paid model, a combination of those models, or another model; (c) a description of the relevant business model, and the proportion of total annual revenue derived from each model; (d) where applicable, the impact of fees charged for services other than ESG rating activities on the determination of fees for ESG ratings, together with a description of those other services.	Refer to the Fees Statement, available at https://www.ice.com/fixed-income-data-services/ice-climate-data-analytics/regulation
Organisational disclosures	**Annex III 1.n**	**Article 6(3)**	The main risks of conflicts of interest and the steps taken to mitigate them; ESG rating providers shall indicate the areas of the ESG rating provider's activities, services or organisational structure from which the main risks of conflicts of interest may arise	Refer to the Conflict of Interest Policy, available at https://www.ice.com/fixed-income-data-services/ice-climate-data-analytics/regulation

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