ICE DATA SERVICES IRELAND LIMITED

ESG Ratings Complaints and Reasoned Concerns-Handling Policy

October 2026

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1. OVERVIEW

1.1. ICE Data Services Ireland Limited ("**ICE Climate**", "**Company**" "**we**" or "**us**") has developed this Complaints and Reasoned Concerns Handling Policy (the "**Policy**") pursuant to 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 (the "**Regulation**"). This Policy sets out the procedures for ICE Climate's receipt, investigation, and retention of records concerning complaints made by users of ESG ratings[1] receiving services from the Company, by rated items, and by issuers of rated items and ICE Climate's procedures for receiving reasoned concerns about its ESG ratings.

1.2. Terms used but not defined in this document have the meanings given to them in the Regulation or applicable ICE Climate policy.

1.3. This policy does not apply to regular customer support interactions or queries, and we will not treat such interactions as 'Eligible Complaints' or 'Reasoned Concerns' (each, as defined below). The following are examples of regular support correspondence that we do not consider to be 'Eligible Complaints' or 'Reasoned Concerns':

1.3.1 Requests for data and scores made through ICE Climate's Issuer and score search webpage (the "**Website**"), including those emailed directly to ESGDataInquiry@ice.com;

1.3.2 Queries regarding ESG ratings or scores or data sources submitted through the ICE Climate client platform, except where ICE Climate determines that such query qualifies as an Eligible Complaint, in ICE Climate's sole discretion.

In the event ICE Climate determines that a query or request received through the Website qualifies as an Eligible Complaint, ICE Climate will inform the submitter within a reasonable period of time that ICE Climate will be treating their communication as an Eligible Complaint and investigate it in accordance with this Policy. However, the Website and the ICE Climate client platform are not specifically monitored to check for potential Eligible Complaints and all complaints should be submitted to the email address in Section 2 below (and following the process summarized there) to ensure that your complaint is picked up and dealt with promptly.

2. MAKING A COMPLAINT

2.1. Complaints must be submitted in writing by email and must include "Complaint - ICE Climate Ratings" in the subject line. The email address to submit complaints to is Legal-ICEClimateRatings-Compliance@ice.com. ICE Climate is not obliged to investigate any complaint unless and until it has been submitted by email in accordance with this Policy.

2.2. A person who submits a complaint is a "Complainant." When submitting complaints, Complainants should:

2.2.1. Include their full name, position and employer, or, as applicable, status as an independent contractor;

2.2.2. State clearly the nature of the complaint, including the specific ESG rating(s) or rated item(s) to which the complaint relates;

2.2.3. Indicate when the Complainant first became aware of the matter giving rise to the complaint, and, if the issue occurred on more than one occasion, how often it has occurred and dates of the occurrence;

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2.2.4. Ensure such complaint is signed by or sent from the email of a duly authorized person on behalf of the Complainant, if the affected Complainant is a company, partnership, or other type of legal entity;

2.2.5. Describe how the Complainant has been affected.

2.3. Failure to submit a complaint with the above information may result in delayed resolution of the complaint.

2.4. Upon ICE Climate's receipt of a complaint submitted in accordance with this Policy, we will aim to reply via email within five (5) business days to acknowledge receipt.

3. ELIGIBLE COMPLAINTS

3.1. A complaint is an "Eligible Complaint" if it meets each of the following criteria:

3.1.1. The complaint is submitted to ICE Climate in accordance with this Policy;

3.1.2. The complaint is submitted by a user of ESG ratings, by rated items, or by issuers of rated items

3.1.3. The complaint is in respect of the following;

3.1.3.1. The sources of data used for an individual ESG rating, factual errors and mistakes;

3.1.3.2. The way in which the rating methodology in relation to an individual ESG rating has been applied;

3.1.3.3. Whether an individual ESG rating is representative of the rated item or the issuer of the rated item;

3.2. If we determine that a complaint submitted in accordance with this Policy is not an Eligible Complaint, we will inform you of this determination.

4. INVESTIGATING THE ELIGIBLE COMPLAINT

4.1. Where we determine that the complaint is an Eligible Complaint, we will aim to investigate it in a timely and fair manner. We will treat Eligible Complaints as confidential and only share information internally as required to investigate and resolve an Eligible Complaint.

4.2. The investigation will be conducted independently of any personnel who have been involved in the determination of the individual rating about which the Eligible Complaint is made. The individual(s) appointed to conduct an investigation into an Eligible Complaint is referred to as the "Investigator."

4.3. In the Investigator's assessment of an Eligible Complaint, factors that may be relevant include:

- the particular circumstances of the Eligible Complaint;

[1] For convenience, pursuant to the Regulation, an 'ESG rating' means an opinion or a score, or a combination of both, regarding a rated item's profile or characteristics with regard to environmental, social and human rights, or governance factors, or regarding a rated item's exposure to risks or impact on environmental, social and human rights, or governance factors, that is based on both an established methodology and a defined ranking system of rating categories, irrespective of whether such ESG rating is labelled as 'ESG rating', 'ESG opinion' or 'ESG score'

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- similarities with other Eligible Complaints that may have been received by us; and
- guidance published by relevant authorities or organizations, which may include regulators and industry associations.

4.4. During the review of the Eligible Complaint, we may need to obtain further information from you and/or from third parties. We may also request clarification of the information you have provided to us. If we ask you for further information or validation, please respond to us as soon as possible so that we may continue to resolve the Eligible Complaint quickly. Delays in responding to us may result in delays in our ability to resolve the Eligible Complaint.

5. RESOLVING THE ELIGIBLE COMPLAINT

5.1. On completion of the investigation of the Eligible Complaint, we will write to you promptly with the outcome of the investigation, unless such communication would be contrary to objectives of public policy or to the Market Abuse Regulation (Regulation (EU) 596/2014). If the Eligible Complaint is rejected, we will advise you of the reasons for rejection.

5.2. If we cannot provide you a response with the outcome of the investigation within eight (8) weeks of the date from which the complaint was communicated to you as an Eligible Complaint, we will write to you to explain why and to let you know when we expect to complete the review

6. PROCEDURES FOR RECEIVING REASONED CONCERNS

6.1. In addition to the complaints-handling procedures set out above, ICE Climate has established a separate procedure for receiving Reasoned Concerns (as defined below) pursuant to the Regulation. This section applies to stakeholders who wish to raise a Reasoned Concern about ICE Climate's ESG rating activities.

6.2. A "Reasoned Concern" is a substantiated concern submitted by a stakeholder in relation to ICE Climate's ESG rating activities, such as (a) concerns regarding the integrity, independence, or transparency of ICE Climate's ESG rating processes, or (b) any matter arising under the Regulation that the stakeholder reasonably believes warrants ICE Climate's attention. If a Reasoned Concern meets the criteria for an Eligible Complaint, pursuant to Section 3 of this Policy, the procedure for handling Eligible Complaints will be followed in lieu of the procedure for Reasoned Concerns.

6.3. Reasoned Concerns must be submitted in writing by email to Legal-ICEClimateRatings-Compliance@ice.com with the subject line "Reasoned Concern – ICE Climate Ratings" Each Reasoned Concern submission must include:

6.3.1. The submitting stakeholder's full name and position (including employer or organizational affiliation, as applicable);

6.3.2. A clear description of the concern, including the specific aspect of ICE Climate's ESG rating activities to which it relates; and

6.3.3. The grounds on which the concern is based, including any supporting information or documentation relevant to the concern.

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6.4. Provided a Reasoned Concern is submitted in accordance with the above inclusions, we will endeavor to reply to it within 30 working days of receipt. Where we are unable to provide a response within that period, we will notify the submitting stakeholder and indicate when a response may be expected.

6.5. General queries or information requests are not Reasoned Concerns and will be handled through ICE Climate's general client support procedures.

7. RECORDKEEPING

7.1. The Compliance Department will maintain all documents relating to any complaints received pursuant to Section 2 and Reasoned Concerns submitted pursuant to Section 6 for at least five years.

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