

## **CONFIDENTIALITY POLICY**

### **1. Introduction:**

SES ESG Research Private Ltd (“SES ESG”) is committed to maintain confidentiality of all non-public information (if received any from a rated entity or from its clients). It is important that SES ESG protects and safeguards the confidential information that it gathers, creates and possesses. Loss or misuse of confidential information could harm the company’s reputation, lead to loss of clients and have legal implications. All employees working at SES ESG are legally and morally bound to protect confidentiality of any non-public information that they may come into contact with during the course of their work. An employee will not, at any time during his/her employment with the Company or thereafter, divulge any of the affairs of the Company to any other company, person or persons, without previous written consent of the Company. He or she shall also not use or attempt to use any information acquired by him or her in the course of his/her employment for personal benefit in any manner.

### **2. Applicability:**

This Policy shall apply to all the employees (Includes Off-roll personnel) of SES ESG Research Private Limited.

### **3. Confidential Information:**

“Confidential Information” for the purpose of this Confidentiality Policy shall be any information which is not available in the public domain and shall include but not limited to: any document, email, information, discovery, invention, improvement, patent specification, formulations, plans, ideas, books, accounts, data, reports, drafts of documents of all kinds, correspondence, client information, lists and files, decisions, information about Employees or suppliers, strategies, drawings, recommendations, designs, office precedents, policies and procedures, budget and financial information in any form, i.e. physical, electronic, electromagnetic or otherwise is commercially valuable such as trade secrets, confidential information and proprietary information concerning products and services (both those already in the market and those being developed) are special, valuable and unique assets of SES ESG and shall include information procured or received from the clients of SES ESG during various business engagements shall also be considered as confidential in nature whether or not the same has been explicitly marked as confidential or not.

### **4. Requirements:**

Employees in possession of Confidential Information shall comply with the following:

- 4.1. Keep all such information confidential;
- 4.2. Respect and maintain the confidentiality of all Confidential Information related to SES ESG or its activities and all non-public information obtained in the performance of the Employee’s duties about SES ESG customers, clients or applicable third parties;
- 4.3. If received any Confidential Information, it shall be used solely for the purposes of performing duties as an Employee of SES ESG;
- 4.4. Only disclose Confidential Information to persons within SES ESG who have a need to know and with an obligation to keep it confidential;

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4.5. Shall desist from copying or disseminating internal communications, whether or not marked confidential, to third parties (unless the Employee is providing information to a regulator or government agency);

4.6. Employees shall not use for any purpose or disclose to others any Confidential Information or non-public information whether marked confidential or not, including sending confidential and/or internal work materials to personal email accounts. For example:

4.6.1. Employees obtaining unpublished price sensitive information about another company or securities shall not trade in the securities of such other company until such non-public information becomes publicly known.

4.7. Trade secrets, confidential information and proprietary information concerning products and services (both those already in the market and those being developed) are special, valuable and unique assets of SES ESG. Employees should hold all trade secrets and other confidential or proprietary information in strictest confidence and should not use such trade secrets or confidential or proprietary information in any way other than in performing their duties as employees;

4.8. Trade secrets and other confidential or proprietary information shall not be misappropriated, transferred or disclosed, directly or indirectly, to any person or entity. This obligation remains in effect even after an Employee leaves SES ESG;

4.9. No Employee may, without appropriate approval disclose to any person in advance of publication by SES ESG, details pertaining to any rating, grading or any other information on any product or service of SES ESG in any medium;

4.10. No written document containing Confidential Information must be left visible where it can be read by anyone. This includes telephone messages, computer prints, letters and other documents. All hardware containing confidential information must be housed in a secure environment.

4.11. Comply with Confidentiality obligations under agreement signed with the client.

Nothing in this section shall prohibit or restrict an Employee/personnel from initiating communications directly with, or responding to an inquiry from, or providing testimony before, the applicable regulatory authority.

## **5. Relationship to other Policies:**

This Confidentiality Policy, where relevant, should be read in conjunction with the appointment letter and/or employment contract applicable to SES ESG Employees and personnel, and other work rules, policies and procedures applicable to such Employees and personnel and all other applicable policies.

## **6. Disciplinary Action:**

Any violation of the above policy will be viewed very seriously and stern action may be taken, which may, inter-alia, include termination from the services of SES ESG.