

STATEMENT OF APPLICATION

ICMA Code of Conduct for ESG Ratings and Data Products Providers

givvable is an AI native intelligence provider for responsible and sustainable sourcing, and supplier diligence. givvable's intelligence is used by companies and governments worldwide to vet, screen, engage and benchmark suppliers.

givvable enables the discovery, vetting, screening and tracking of responsible and sustainable sourcing Credentials, as well as other related action and risk Data relevant to businesses and governments' supplier diligence and procurement and investment decisions. This Data is flexibly delivered to third party platforms and internal enterprise systems via MCP and API. This Data is also accessible via givvable's toolkit.

Further information in relation to givvable's products can be found on www.givvable.com and in givvable's [Methodology Overview](#).

givvable has voluntarily signed up to the ICMA Code of Conduct for ESG Ratings and Data Products Providers (ICMA Code) and has voluntarily adopted the Singapore Code of Conduct for ESG Rating and Data Product Providers (Singapore Code). We recognize the importance of each of the ICMA Code and the Singapore Code in building transparency and accountability, and support initiatives aimed at making sure that decision-makers can rely on consistent, high-quality and reliable ESG data.

We set out below our approach to applying the ICMA Code's 6 principles in connection with our ESG data products.

givvable also draws attention to givvable's [Methodology Overview](#), [Terms and Conditions](#), [Privacy Policy](#) and [Conflicts Policy](#), all of which are available on www.givvable.com. Defined terms have the same meaning given to them in the ICMA Code or givvable's Methodology Overview, as applicable.

1: Principle on Good Governance

givvable has a clear organizational structure and is committed to ensuring appropriate governance arrangements are in place to support transparency in relation to its methodology and data sources, management of any conflicts of interest, and objectivity in relation to the products it provides.

givvable has implemented clear oversight systems with well-defined roles in relation to the identification, matching, enrichment and structuring of Data and the subsequent mapping by

givvable's sustainability team of:

- Credentials to givvable data frameworks and indicators; and
- Products & Services and Locations to risk levels for different sustainability issues,

in accordance with givvable's methodology, which includes a review process to support the issuance of high quality ESG data products. Review may be AI-supported or involve peer review by a member of the Sustainability Team before being finalized and made available on givvable.

All members of givvable's sustainability team have qualifications and/or significant experience and expertise in sustainability and/or social impact. Collectively, the team has experience with sustainability frameworks, standards and regulatory requirements, ESG research and analysis, sustainable finance, development of frameworks and methodologies and current and emerging responsible and sustainable sourcing issues. The sustainability team has acquired specialist and unique knowledge and expertise in relation to Credential and risk mapping and creating givvable's proprietary Data. The team is led by givvable's Head of Sustainability and each member has a clearly defined reporting line and responsibilities.

Further information in relation to givvable's governance arrangements and conflicts of interest framework is provided in givvable's [Methodology Overview](#) and [Conflicts Policy](#), respectively.

2: Principle on Security Quality (Systems and Controls)

givvable's [Methodology Overview](#) provides information on givvable's:

- Data sources, including an explanation of where non-publicly disclosed data is used.
- Methodology and processes that are used to produce givvable's data products.
- Approach to updating its Methodology and data products.
- Records management.
- Resources and personnel involved in preparing data products.

As recommended, givvable provides its data products to clients in a machine-readable format, including via givvable (digital platform), PowerBI, MCP, API and .csv.

Full reviews of givvable's Methodology are conducted every 2 years and relevant sections are reviewed in between full reviews as needed if there are material external developments of relevance to givvable's methodology, frameworks, indicators or processes. givvable will update its Methodology for any material changes and, where relevant and possible, will indicate the potential impacts of these changes on its data products.

3: Principle on Conflicts of Interest

givvable has adopted a Conflicts of Interest framework for managing actual or potential conflicts of interest arising from its business activities and the development and provision of responsible and sustainable sourcing credential and supply chain transparency data products (together, its Responsible and Sustainable Sourcing Activities). Further information on givvable's framework can be found in givvable's [Methodology Overview](#) and Conflicts Policy, which are made available on www.givvable.com.

givvable has relationships with various partners, including Credential issuers, from which it may source data, independently or via a contractual relationship. These relationships may include referral arrangements, some of which may include the payment of referral fees. No Credential issuer has any input or is asked to provide a view on any aspect of the mapping of a Credential, which underpins givvable's ESG data products. See givvable's [Methodology Overview](#) for further information. By virtue of the Credentials they hold, other givvable partners may also have a profile on givvable, independent of any contractual arrangements with givvable.

4: Principle on Transparency

Information on givvable's products and a summary of givvable's Methodology are made publicly available on www.givvable.com. givvable's [Methodology Overview](#) also provides a description of givvable's products and their intended purpose as well as information about givvable's data sources and governance arrangements, and its methodology and processes, including for mapping Credentials to givvable frameworks and indicators, which underpins its data products.

5: Principle on Confidentiality (Systems and Controls)

givvable uses a number of external AI models, and its proprietary data matching and enrichment processes, to identify Credentials held by businesses and other organizations. givvable also has partnerships with Credential issuers enabling the import of Credentials from closed sources.

Certain information provided by givvable customers may include non-public information. Use of information provided by a business is governed by givvable's [Terms and Conditions](#), which are made available on www.givvable.com.

Businesses may also provide givvable with information on their business via givvable's Supplier Engagement Portal (see further Principle 6 below). The use of information provided to givvable by a business is governed by givvable's [Terms and Conditions](#).

givvable has policies and procedures in place related to data protection and retention and information security.

See further givvable's [Methodology Overview](#), [Terms and Conditions](#) and [Privacy Policy](#) for information regarding givvable's policies and procedures for addressing and protecting any non-public information received by givvable.

6: Principle on Engagement (Systems and Controls)

givvable uses a number of external AI models, and its proprietary data matching and enrichment processes, to identify Credentials used in producing its data products. givvable also has partnerships with Credential issuers enabling the import of Credentials from closed sources. givvable does not require information from covered entities to prepare its Data, nor does it directly request information from covered entities.

givvable may invite a business to register, create or update a business profile on givvable's Supplier Engagement Portal. Via that portal, a business may provide information on their business, including Credentials and diverse and social attributes, and may complete modules. The portal enables a business's information to be collected in an efficient way and, to the extent givvable already has information on a business, this information will have been pre-populated in a business's profile.

The information on Credentials held by the business and the sustainability insights provided by givvable in relation to that business are freely available to registered businesses. Any business registered on givvable can access givvable's [Methodology Overview](#).

Businesses can update their information via givvable's Supplier Engagement Portal when there is a change and are recommended to complete modules on an annual basis to maintain currency.

givvable provides businesses with the ability to report an issue with Credentials visible on givvable via givvable's Supplier Engagement Portal. Businesses can also contact givvable directly via support@givvable.com with any queries.

Further information in relation to how givvable collects information from businesses is provided in givvable's [Methodology Overview](#).

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