ICMA CODE OF CONDUCT FOR ESG RATINGS AND DATA PRODUCTS PROVIDERS

givvable is an AI-powered Sustainability & ESG Intelligence Platform, which automates the discovery, vetting, screening and tracking of sustainability & ESG credentials, as well as other related Data relevant to businesses and governments' procurement and investment decisions.

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 welcome the development of each of the ICMA Code and Singapore Code as important steps 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, import and structuring of Data and the subsequent mapping of Credentials by givvable's sustainability team in accordance with givvable's methodology, which includes a peer review process to support the issuance of high quality ESG data products.

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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 sustainability & ESG issues. The sustainability team has acquired specialist and unique knowledge and expertise in relation to mapping Credentials 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:

a) Data sources, including an explanation of where non-publicly disclosed data is used.
b) Methodology and processes that are used to produce givvable's data products.
c) Approach to updating its Methodology and data products.
d) Records management.
e) 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, 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.

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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 its Data. 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 sustainability and ESG Credentials to givvable frameworks and indicators, which underpins its data products.

5: Principle on Confidentiality (Systems and Controls)

givvable predominantly uses publicly available information in producing its data products. 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.

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For specific modules available on the Supplier Engagement Portal, givvable will not disclose a business's responses to a third party without the business's consent. 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 captures the majority of information used to produce its data products from a range of publicly available sources or via partnerships with Credential issuers. 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.