

CONFLICTS OF INTEREST POLICY

Objectivity in Every Assessment. Integrity in Every Relationship.

Policy Owner	Chief Executive Officer
Approved By	Director + Sustainability + People & Culture
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Classification	Public

1. Purpose & Scope

givvable provides a range of data products and services that serve a variety of client types, including the development and provision of responsible and sustainable sourcing credential and supply chain transparency data products (together, our Responsible and Sustainable Sourcing Activities). This Policy sets out givvable's framework for identifying, disclosing, and managing actual or potential conflicts of interest arising from our Responsible and Sustainable Sourcing Activities and our broader business operations.

This Policy operates alongside, and should be read together with, givvable's Anti-Bribery & Anti-Corruption (ABAC) Policy. The ABAC Policy sets out our zero-tolerance approach to bribery and corruption and our general standards for gifts, hospitality, and third-party integrity risk. This Policy focuses specifically on conflicts of interest arising from the objectivity and independence required of our Responsible and Sustainable Sourcing Activities, and applies a stricter standard in that context where noted below.

The framework encompasses public and regulatory disclosure of possible conflicts of interest, policies and procedures for identifying and managing conflicts of interest, periodic evaluation and monitoring of the effectiveness of those policies and procedures, and training for all employees on recognising and managing conflicts of interest.

1.1 Scope

This Policy applies to:

- All givvable employees, contractors, and consultants globally
- Directors and senior leadership
- Our direct suppliers, technology partners, and vendors
- Third parties acting on givvable's behalf
- All personnel involved in the development, delivery, or oversight of givvable's Responsible and Sustainable Sourcing Activities

This Policy covers our operations in all jurisdictions in which givvable operates or intends to operate.

2. Our Commitment

givvable recognises the importance of maintaining the integrity and objectivity of its Responsible and Sustainable Sourcing Activities, and the potential and perceived conflicts of interest that can arise from receiving fees for responsible and sustainable sourcing data products and services, from the associations and interactions our people have with external parties, and from our employees' personal interests. We are committed to:

- Maintaining a list of actual or potential conflicts of interest, including activities that are prohibited or, where permissible, managed through written policies and procedures
- Reviewing this list, and related policies, procedures, and controls, periodically
- Disclosing actual or potential conflicts of interest to the public and relevant authorities, where required
- Providing training to all employees on recognising and managing conflicts of interest

3. Key Definitions

For the purposes of this Policy:

Term	Meaning
Responsible and Sustainable Sourcing Activities	givvable's data products and services relating to responsible and sustainable sourcing credentials, sustainability intelligence, and supply chain transparency, together with their development and provision.
Subject Entity	An organisation for which givvable holds credential or attribute data and/or which has registered on givvable.
Confidential Information	Non-public information obtained in the course of givvable's Responsible and Sustainable Sourcing Activities that is not disclosable in nature and has not already been publicly disclosed or made available directly by a Subject Entity or primary source data issuer.
Associate	Any person who performs services for or on behalf of givvable, including employees, contractors, agents, subsidiaries, and joint venture partners (as defined in givvable's ABAC Policy).

4. Actual or Potential Conflicts of Interest

givvable has identified the following actual or potential conflicts of interest relating to its Responsible and Sustainable Sourcing Activities. In each case, the relevant factor could impact, or give the appearance of impacting, givvable's objectivity:

- Commercial factors, including fees, engagement progress, partnerships, subscriptions, referral, and licensing arrangements
- Different Responsible and Sustainable Sourcing Activities serving different clients' needs
- Remuneration or other incentives (financial or otherwise) received by givvable or its employees
- A client of givvable, or a Subject Entity, that is also a vendor or supplier to givvable
- A givvable employee's personal ownership interests, including in securities and money market instruments
- A givvable employee's more-than-arm's-length, ordinary-course-of-business relationships, including outside business activities
- A givvable employee's receipt of gifts, entertainment, or inducements

- Material non-public information accessed during employment that may influence a givvable employee's personal ownership decisions

5. Identification and Management of Conflicts of Interest

givvable maintains a list of actual or potential conflicts of interest, including activities that are prohibited or, where permissible, managed through the written policies, procedures, and controls set out below. This list and related controls are reviewed periodically.

5.1 Internal Organisation & Infrastructure

- givvable maintains a governance structure with clear reporting lines, roles, and responsibilities (see Section 7)
- givvable's Sustainability team, who are responsible for mapping Subject Entities' sustainability actions, have no input into how pricing is determined or calculated
- All givvable Associates are prohibited from accepting any inducements, fees, or gifts above a fair market value of AUD \$20.00 from Subject Entities, partners, or clients in connection with givvable's Responsible and Sustainable Sourcing Activities. This is a stricter, activity-specific threshold than the general AUD 150 gifts and hospitality threshold in givvable's ABAC Policy, reflecting the higher objectivity standard required of Responsible and Sustainable Sourcing Activities (see Section 6).

5.2 Confidential Information

As a general practice, givvable bases its Responsible and Sustainable Sourcing Activities on information that is disclosable in nature, already publicly disclosed or available, or provided directly by Subject Entities or primary source data issuers. To the extent Confidential Information is received, it may only be shared or discussed in accordance with givvable's data privacy and security policies.

5.3 Remuneration

The remuneration structure for givvable Associates is not directly linked to specific Responsible and Sustainable Sourcing Activity outcomes.

5.4 Personal Interests

At the start of employment and periodically thereafter, givvable personnel are required to provide People & Culture with information relating to personal interests, such as securities ownership and trading, outside business interests, significant personal relationships, and former employment. The CEO, in consultation with People & Culture, determines whether an actual or potential conflict of interest exists and directs the employee to take appropriate action, which may include divestment of financial interests or removal from outside business appointments.

5.5 Responsible and Sustainable Sourcing Data Processes & Methodology

givvable applies its methodology consistently across its processes for the development and provision of its data products and services, and uses the same standard of objectivity when assessing or interacting with Subject Entities and primary source data issuers, irrespective of whether the Subject Entity or data issuer is also a client, business partner, or supplier. givvable maintains controls to ensure the effectiveness of, and adherence to, its data import and mapping processes and methodology.

5.6 Communication with Clients, Subject Entities & Data Issuers

Communication with primary source data issuers regarding the mapping of credentials is managed by the Sustainability team, while commercial communication is managed by Business Development, Sales, and the Co-Founder team. Business Development and Sales personnel are

prohibited from discussing specific pricing details with the Sustainability team where doing so could place pressure on that team (for example, contract value or client tier). Where a Subject Entity is also a prospective client or client, Business Development, Sales, and Co-Founder personnel may also make contact, alongside data and support teams.

6. Gifts, Entertainment & Inducements

Reasonable and proportionate gifts and hospitality can form a legitimate part of business relationships, and givvable's general standards for gifts and hospitality are set out in the ABAC Policy (which sets an AUD 150 approval threshold). Because givvable's Responsible and Sustainable Sourcing Activities depend on independence from the entities we assess, this Policy applies a stricter, activity-specific standard:

- All inducements, fees, or gifts from Subject Entities, partners, or clients connected to givvable's Responsible and Sustainable Sourcing Activities above a fair market value of AUD \$20.00 are prohibited outright, rather than merely requiring approval
- Gifts of cash or cash equivalents (for example, gift cards or vouchers) in connection with Responsible and Sustainable Sourcing Activities are prohibited regardless of value
- Any gift or hospitality that could reasonably be perceived as improperly influencing a mapping, assessment, or scoring decision must be declined

Gifts and hospitality unrelated to givvable's Responsible and Sustainable Sourcing Activities (for example, general commercial relationships with technology vendors) are instead governed by the ABAC Policy's AUD 150 threshold and CEO approval process.

7. Governance & Accountability

7.1 Roles and Responsibilities

Role	Responsibility
Directors	Approve and oversee this Policy; hold management accountable for the effective management of conflicts of interest.
Chief Executive Officer	Own policy implementation; determine and approve actions arising from personal interest disclosures; approve any exceptions; responsible for public and regulatory disclosure of conflicts where required.
Sustainability	Maintain access control protocols separating credential mapping from pricing information; apply givvable's methodology consistently to all Subject Entities and data issuers.
Business Development and Partnerships	Manage commercial communications with clients and Subject Entities; avoid disclosing pricing details that could pressure the Sustainability team.
People & Culture	Collect and maintain personal interest disclosures; embed conflicts-of-interest awareness in induction and ongoing training.
All Employees and contractors	Understand and comply with this Policy; disclose actual or potential conflicts of interest promptly; report concerns through appropriate channels.

8. Reporting & Grievance Mechanisms

givvable is committed to providing safe, accessible, and confidential channels for reporting conflicts of interest concerns. We operate a zero-tolerance approach to retaliation against anyone who raises a concern in good faith.

8.1 Internal Reporting

- Employees may raise concerns, or disclose a personal interest, with their line manager, People & Culture, or the CEO
- All reports are investigated promptly, impartially, and confidentially
- Where a concern relates to the CEO or a Director, reports may be made directly to another Director or People & Culture, who must investigate independently

8.2 External Stakeholders

- Suppliers, partners, and third parties may raise concerns via support@givvable.com
- Where required, givvable's Directors are responsible for publishing or disclosing actual or potential conflicts of interest to the public and/or the relevant national competent authority

8.3 Non-Retaliation

givvable strictly prohibits retaliation against any person who, in good faith, reports a suspected conflict of interest, raises a concern, or participates in an investigation. Any employee found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

9. Applicable Frameworks & Standards

Governing Frameworks & Standards

givvable Anti-Bribery & Anti-Corruption Policy

Corporations Act 2001 (Cth) — directors' duties and disclosure obligations

ICMA Code of Conduct for ESG Ratings and Data Products Providers

Singapore Code of Conduct for ESG Rating and Data Product Providers

10. Policy Review & Amendment

This Policy will be reviewed annually by the Directors, with input from the CEO, Sustainability and People & Culture. Ad hoc reviews will be conducted in response to significant changes in our business operations, applicable law, or the emergence of new conflicts of interest risks.

The most current version of this Policy is available on the givvable intranet and public website. All previous versions are archived and available upon request.

Policy Approval

This Policy has been approved and takes effect from 1 July 2026.

Chief Executive Officer, givvable Pty Ltd

Date: 23.06.2026