

Conflict of Interest Policy

1. Introduction

At Resurgent ESG Services Private Limited ("the Company"), we are committed to maintaining the highest standards of ethical conduct and integrity in our business operations. As a Category-II ESG Rating Provider registered with the Securities and Exchange Board of India (SEBI), we recognize the critical importance of managing conflicts of interest to ensure the credibility and independence of our ESG ratings.

This policy outlines our approach to identifying, disclosing, and managing potential conflicts of interest that may arise in the course of our business activities. It applies to all employees, senior management, and directors of the Company.

2. Definition of Conflict of Interest

A conflict of interest exists when an individual's personal interests interfere, or appear to interfere, with the interests of the Company. This can include situations where an employee's judgment or actions in their professional capacity may be influenced by personal or external factors.

3. General Principles

- 3.1.** All employees are expected to act in the best interests of the Company and to exercise sound judgment unclouded by personal interests or divided loyalties.
- 3.2.** Employees must disclose any actual or potential conflicts of interest to their manager or supervisor and the Compliance function.
- 3.3.** The Company maintains a strict separation between its rating activities and commercial operations to prevent any compromise of the integrity or independence of its ESG ratings.

4. Specific Guidelines

4.1. Interests in Outside Companies

- Employees must not participate in vendor selection, business partnerships, or the rating process for any entity in which they or their relatives have a significant business interest.
- Any significant interest in another company that could influence an employee's decision-making must be disclosed and approved by management and the Compliance function.

4.2. Outside Employment and Positions

- Employees must obtain approval from their manager and the Compliance function before accepting any position with an outside company, including non-profit organizations.
- Part-time or second jobs are generally not permitted.
- Requests to serve on the board of directors of any company rated by Resurgent ESG Services Private Limited will typically not be approved.

4.3. Recent Employment Disclosure

- New employees must report any relevant employment or engagements from the 12 months prior to joining the Company to the Compliance function and their manager.

4.4. Business Interests of Relatives

- Employees must disclose any business interests of their relatives that could cause an actual or potential conflict of interest with their professional activities.

4.5. Other Relationships

- Employees must disclose any close personal relationships that may create actual or potential conflicts of interest.

4.6. Purchasing Decisions

- All purchasing decisions must be based solely on quality, price, and service, regardless of whether a vendor is also a customer of the Company.

4.7. Improper Personal Benefits

- Employees and directors must not accept any improper personal benefits as a result of their position in the Company.
- The Company will not provide personal loans or guarantees to directors or senior management unless specifically allowed by applicable laws or Company policies.

5. Separation of Rating and Commercial Activities

5.1. The Company maintains a strict separation between its ESG rating activities and commercial operations, including sales and marketing.

5.2. Commercial considerations must not influence the integrity or independence of ESG ratings.

5.3. Employees involved in the rating process must disclose any potential conflicts that would make them ineligible to participate in determining an ESG rating.

6. Disclosure and Reporting

6.1. Employees are required to promptly disclose any actual or potential conflicts of interest to their manager or supervisor and the Compliance function.

6.2. The Compliance function will assess all disclosed conflicts and determine appropriate mitigation measures.

6.3. Regular training will be provided to all employees on identifying and managing conflicts of interest.

7. Policy Review and Updates

This policy will be reviewed annually and updated as necessary to ensure its effectiveness and compliance with regulatory requirements.