



Confidentiality Policy

1. Purpose

Protect all confidential information received or generated during ESG rating activities and ensure compliance with regulatory and internal standards.

2. Scope

Applies to all employees, directors, analysts, consultants, interns, contractual staff, and third-party service providers.

3. Definition of Confidential Information

Includes all non-public information such as:

- ESG data, documents, declarations, submissions, KPIs
- Internal assessments, analysis, scoring, and rating models
- Client financial/operational data
- Internal emails, discussions, meeting notes
- Proprietary methodologies and tools
- Any information marked or reasonably understood as confidential

4. Obligations of Employees

- Use confidential information only for authorized rating purposes.
- Do not share information with unauthorized persons internally or externally.
- Do not store or transfer confidential data on personal devices or unapproved platforms.
- Protect documents through secure systems, passwords, and access restrictions.
- Report any suspected data breach immediately.



5. Restrictions Related to Rating Activities

- No disclosure of draft findings, internal scoring discussions, or preliminary ratings.
- No use of one client's information for assessing another client.
- No public sharing of rating details prior to official publication.

6. External Communication Controls

- Only designated and authorized personnel may communicate with clients, regulators, or media.
- All disclosures must follow internal approval protocols.

7. Data Storage and Access Control

- Confidential data stored only on approved secure servers or systems.
- Access granted strictly on a need-to-know basis.
- Hard copies stored securely; disposal must follow shredding or secure digital deletion procedures.

8. Third-Party and Outsourcing Controls

- Third parties must sign a Non-Disclosure Agreement before accessing any data.
- Vendors must follow company data protection and confidentiality standards.

9. Employee Exit Requirements

- All confidential materials, devices, and access credentials must be returned.
- Confidentiality obligations continue even after employment ends.



10. Breach and Consequences

- Unauthorized disclosure or misuse may lead to disciplinary action, termination, or legal consequences.
- Serious breaches may be escalated to regulatory authorities.

Approved by
Dr. Umang Shah
Board of Director
Shesh ESG Rating Private Limited
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