



Firewall Policy

1. Purpose

This policy establishes clear boundaries ("firewalls") between **Shesh ESG Rating Provider's (ERP)** analytical, business development, and affiliated activities to ensure independence, confidentiality, and avoidance of conflicts of interest in ESG rating operations, in line with SEBI (Credit Rating Agencies) Regulations, 1999 and the Master Circular for ESG Rating Providers (July 2025).

2. Objective

- To prevent leakage of confidential and price-sensitive information between rating and non-rating functions.
- To maintain independence and objectivity in ESG rating decisions.
- To ensure compliance with SEBI's governance, conduct, and disclosure requirements.

3. Scope

This policy applies to:

- All employees, directors, consultants, and contractors of Shesh ESG Rating Provider.
- All departments, including analytical, IT, compliance, business development, and administration.
- All data systems and communication channels used in ESG rating operations.



4. Key Principles

1. Separation of Functions:

- The **analytical team** (responsible for ESG assessments) shall operate independently from **business development, marketing, and affiliate entities**.
- No analyst shall engage in marketing, fee negotiation, or client acquisition activities.

2. Access Control:

- Access to ESG rating information, data, and internal systems shall be restricted based on functional necessity.
- User permissions shall be reviewed quarterly by the Compliance Officer.

3. Physical and Digital Segregation:

- Rating operations and commercial teams shall be housed in separate physical areas or use restricted digital environments.
- File-sharing, email groups, and IT drives shall be separated between teams.

4. Information Barriers:

- No unpublished or non-public ESG rating information shall be shared with anyone outside the rating team before official disclosure.
- Employees shall not discuss clients, ratings, or methodologies in public spaces, social media, or with affiliates.

5. Communication Protocols:

- All client communication regarding ratings shall occur only through authorized analysts and Compliance-approved channels.
- Business development teams may only discuss commercial terms after ratings are finalized.

6. Employee Declarations:

- Employees shall annually declare their **non-affiliation** with any rated entity or its group companies.



- Any potential conflict shall be disclosed immediately to the Compliance Officer.

7. Affiliated Entities:

- If any Shesh Group affiliate provides ESG consulting, audit, or assurance services, it shall operate under a **separate legal entity**, with **no shared resources, data, or directors** (other than independent directors, as permitted).

8. Monitoring and Compliance:

- The Compliance Officer shall conduct half-yearly reviews of adherence to this policy.
- Any breach shall be reported to the Board and SEBI as per regulatory protocol.

5. Roles and Responsibilities

| Role | Responsibilities |
|--------------------|---|
| Board of Directors | Ensure implementation and periodic review of the Firewall Policy. |
| Compliance Officer | Monitor compliance, review system access logs, and handle breach reports. |
| Employees | Maintain confidentiality and follow segregation protocols strictly. |

6. Training and Awareness

- All new employees shall undergo **mandatory firewall and confidentiality training** before system access.
- Annual refresher training shall be conducted for all staff.



7. Breach and Disciplinary Action

Any violation of this Firewall Policy shall be treated as a **serious compliance breach** and may result in disciplinary action, including termination, blacklisting, or regulatory reporting to SEBI.

8. Review and Approval

- This policy shall be reviewed **annually** or upon any regulatory amendment.
- The updated policy shall be approved by the **Board of Directors** and disclosed on the ERP's website under the "Policies and Procedures" section.

Approved by
Dr. Umang Shah
Board of Director
Shesh ESG Rating Private Limited
Effective Date: 01/10/2025