Statement of Application — ICMA Code of Conduct for ESG Ratings and Data Products Providers

Introduction and scope

Impact Cubed Ltd ("Impact Cubed"), a member of the Euroclear Group, signed up to the ICMA Code of Conduct for ESG Ratings and Data Products Providers (the "Code") in December 2024. This Statement sets out how Impact Cubed applies the Code's six Principles. It is published on our website, notified to ICMA, and reviewed at least annually.

Area of application: ESG data products and ESG ratings. Impact Cubed provides quantitative, factual sustainability data to institutional investors, index providers and financial institutions.

Products in scope:

- Corporate ESG and impact factor data (operational and revenue-based metrics across listed and private issuers)
- Products and services classification (2,300+ business activities) and derived SDG, biodiversity and climate alignment data
- Climate data, including emissions, physical risk, transition risk and Paris-alignment metrics
- Sovereign ESG impact data (29 factors across 190+ countries)
- Composite scores derived from the above, such as SDG alignment scores and portfolio-level impact measures, which we treat as ESG scores for the purposes of the Code
- Controversies data, applied in line with paragraphs 4.8–4.9 of the Code

Outside scope: portfolio analytics and index construction tools that clients use to apply our data, and indices administered by third parties that license our data. Impact Cubed does not offer credit ratings, second-party opinions, or ESG consulting to covered entities.

The Code is applied proportionately to the nature, scale and complexity of our business.

Principle 1 — Good governance

The Chief Operating Officer is the accountable executive for the Code and owns this Statement. Responsibilities for determining, publishing and overseeing our data products are allocated as follows:

Function	Responsibility under the Code
Executive Committee	Approves this Statement annually; oversees conflicts, quality and methodology governance
Research	Designs and maintains methodologies; approves material methodology changes
Data	Runs data collection, estimation and quality control
Product	Product definitions, client documentation and change

Function	Responsibility under the Code
	communication
Technology	Information security, access control and delivery infrastructure
Compliance Officer	Conflicts register, Code of Ethics and personal account dealing oversight

Research and data teams are organisationally separate from sales and client teams and report to different heads. Code adherence is reviewed annually by the Executive Committee, alongside this Statement.

Principle 2 — Securing quality

Our data products are built from public, company-disclosed sources and produced under documented methodologies with layered quality control.

- **Sources:** annual and sustainability reports, company websites and recognised public datasets (e.g. World Bank and UN for sovereign data). Each datapoint is flagged as reported or estimated.
- **Estimation:** where disclosure is missing, we apply proprietary peer-group models across 2,300+ sub-sectors and eight levels of granularity, rather than leaving gaps or using flat industry averages.
- **Quality control:** automated extraction and classification (including large language models), algorithmic validation, machine-learning risk scoring and peer-group outlier detection route higher-risk datapoints to analyst review. These cover both procedural checks (was the method followed?) and holistic checks (is the result plausible and coherent?). Client deliverables receive a further platform validation and client-team review before release.
- **Monitoring and updates:** data is refreshed on a regular production cycle as new disclosures are published, with historical time series retained.
- **Methodology review:** methodologies are reviewed regularly. Material changes follow a documented governance process, with impact analysis, and are communicated to clients in advance.
- **Records:** source documents, extraction outputs and QA decisions are retained; for selected metrics (e.g. emissions, waste, water) values are traceable to page-level citations.
- **Resources and people:** dedicated research, data and technology teams, supported by the controls above. Staff are bound by our Code of Ethics.
- **Delivery:** all data is available in machine-readable form via API, SFTP, data feeds and third-party platforms.

Principle 3 — Conflicts of interest

Our business model limits the main sources of conflict in ESG data: we are paid by data users, never by the entities we cover. We maintain a written Conflicts of Interest Policy and a Code of Ethics that apply to all staff.

How conflicts are avoided or managed:

- **No issuer-pays revenue:** we do not charge covered entities for coverage, scores or data corrections, and do not provide consulting services to them.
- **No trading:** Impact Cubed does not deal on its own account.
- **Separation:** research and data teams are organisationally separate from sales and client teams, with separate reporting lines. Commercial staff cannot alter data or methodology outputs.
- **Objective methodology:** outputs are quantitative and rules-based, which limits scope for discretionary judgement on any single entity.
- **Personal account dealing:** staff follow a personal account dealing regime under the Code of Ethics.
- **Remuneration:** no staff member involved in producing data is compensated or evaluated on revenue from any entity they cover or interact with.
- **Gifts and entertainment:** subject to pre-set limits and Compliance Officer approval.

Disclosed potential conflicts:

- **Group affiliation:** Impact Cubed is a member of the Euroclear Group. Euroclear entities may be clients of Impact Cubed, and Euroclear and its affiliates may be covered by our data. Euroclear entities receive standard methodology treatment with no ability to influence their own data.
- **Covered entities that are also clients:** some financial institutions we cover also licence our data. Their data is produced under the same methodology and QA as all other entities, and any correction they raise follows the standard challenge process (Principle 6).
- **Bespoke client work:** client-specific customisations are delivered as separate configurations and never change the standard dataset available to other users.

Principle 4 — Transparency

We publish methodology summaries for each data product on our website and provide full methodology documentation, data dictionaries and change notes to clients. Published information covers, where applicable:

- the purpose and measurement objective of each dataset and score;
- the criteria and KPIs used, and how they are weighted or aggregated into scores;
- the scope of business activities and group entities included (e.g. revenue attribution across 2,300+ activities and by geography);
- principal data sources, the hierarchy between them, and how missing data is estimated or treated;
- the time horizon and reporting period of each metric;
- the meaning of each score band or category.

Every datapoint carries a reported-versus-estimated flag, and our platform shows the share of disclosed versus estimated data at company, fund and portfolio level. We evaluate our methodologies against the outputs they produce at least annually, and summarise material findings and changes on our website.

Proprietary model parameters and code are not published, to protect our intellectual property; this does not prevent users from understanding how outputs are determined.

Principle 5 — Confidentiality

Impact Cubed builds its data from public sources and does not normally receive non-public information from covered entities. The main non-public information we hold is client information, such as portfolio holdings and benchmarks.

- Non-public information is used only to deliver the service it was provided for, under the terms of client contracts, NDAs and data processing agreements.
- Access is role-based and least-privilege, enforced through Microsoft Entra ID with multi-factor authentication, endpoint protection and device management.
- Data is encrypted in transit and at rest. Our information security programme is aligned to ISO 27001 principles, and we act as a GDPR data processor where personal data is involved.
- Staff are bound by confidentiality obligations in their employment terms and the Code of Ethics.
- If a covered entity shares non-public information with us, it is handled under the same controls and used only for the purpose agreed.

Principle 6 — Engagement

Impact Cubed does not collect information from covered entities through bilateral questionnaires; our data is drawn from public disclosures. Actions 6.5–6.6 (advance notice of data requests and pre-filled questionnaires) therefore do not apply. We keep this under review and would apply them if our collection model changes. We intend to implement an engagement system with rated companies soon.

Review and contact

This Statement is reviewed and approved by the Executive Committee at least annually and updated when our products, methodologies or policies change materially. Next review: October 2027.

Prepared by: Dr Arleta Majoch, Co-founder and Chief Operating Officer, Impact Cubed Ltd

Contact: esgdata@impactcubed.com

Related documents: Conflicts of Interest Policy; Code of Ethics; methodology summaries (impactcubed.com).