

Ratings conflict of interest policy

Governance



BeZero

Please direct any questions to the COO if you have concerns about this Policy and how it applies to you.

Introduction

The purpose of this policy is to protect the integrity of BeZero Carbon's decision-making process as regards its ratings and to protect the integrity and reputation of BeZero Carbon, our staff and board members.

All staff including management committee members of BeZero Carbon Limited (BeZero) will strive to avoid any conflict of interest between the interests of BeZero on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

BeZero Carbon has institutionalised robust processes to ensure it identifies, manages and mitigates any actual and or potential conflict of interest as regards its ratings. These processes include pre-employment checks, in-employment declarations, segregation of duties between analytical and commercial functions, processes around all rating actions and restrictions and disclosure on financial interest in carbon markets.

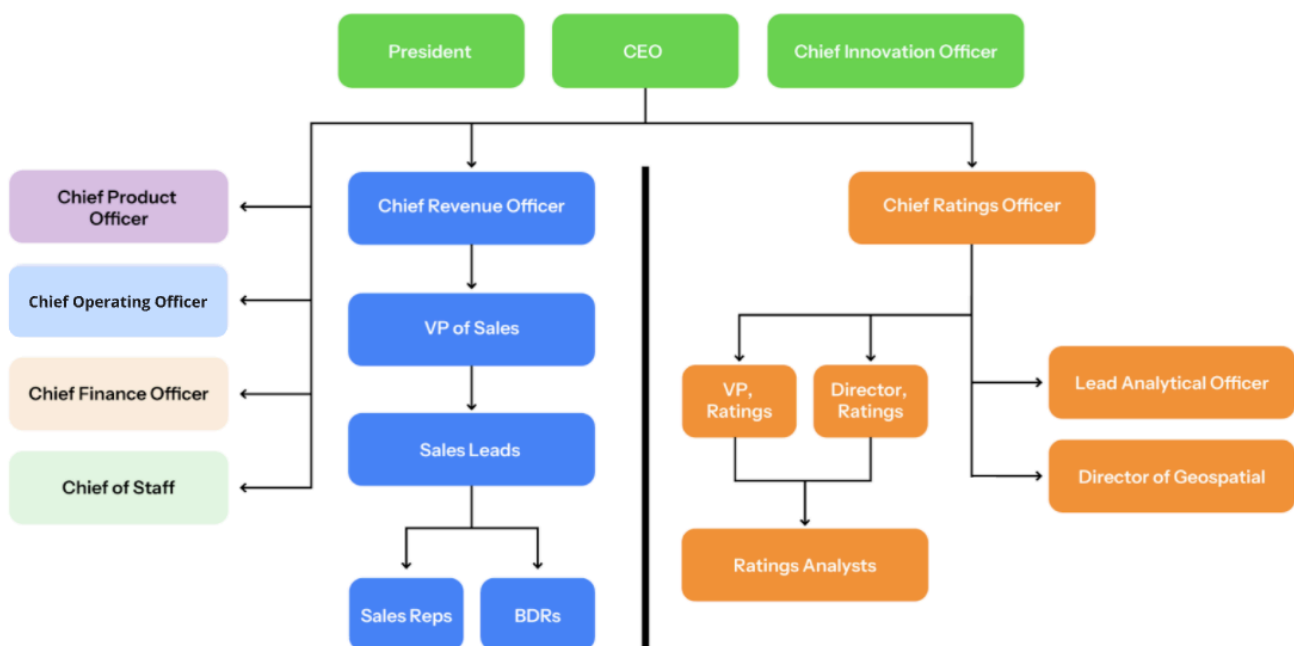
Policy and processes

1. Upon appointment each staff member shall make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This includes any carbon projects they have been involved in in a personal or professional capacity. This disclosure shall be updated for any changes as soon as such changes come into force. This written disclosure will be kept on file and will be updated as appropriate.
2. In the course of meetings or activities, staff members will disclose any interests in a transaction or rating decision where there may be a conflict between the organisation's interests and their personal interests.
3. BeZero Carbon's COO in consultation with the CEO shall determine:
 - a. If the disclosed interest would constitute a potential conflict for BeZero as per this policy. If not, then such staff members could continue with those engagements.
 - b. If the disclosed interest could constitute a potential conflict for BeZero, then such staff member would be required to
 - i. vacate/dis-engage from such association as could potentially cause the conflict;
 - ii. recuse themselves from any involvement or participation in any discussions or decisions causing the conflict.
4. No member of the Ratings Team will participate in ratings or discussions pertaining to a carbon project in which they have had any personal or professional involvement.
5. All members of the Ratings Team are firewalled from the commercial function and any commercial discussions (refer annexure 1 for BeZero Org Structure). They are not permitted to participate in commercial activities. Correspondingly, employees in the Commercial team are

prohibited from involving Ratings Analysts in direct sales activities and influence them or attempt to influence them on the basis of commercial considerations.

6. The Ratings Team compensation is based on their experience and analytical expertise. It is not linked in any manner to the number of or the level of ratings assigned. It is also not linked to revenues from any individual customer or the rating assigned to any individual project.
7. No rating decisions can be made by an individual. All ratings are assigned only by a unanimous vote of the rating committee, composed of senior members of the Ratings Team who are not directly involved in conducting the detailed research on the project being rated/reviewed. The rating committees are formal meetings, with formal minutes, with open and free discussions amongst the members further ensuring no conflicts and bias can influence any rating decision.
8. All BeZero Carbon ratings are published and freely available on the BeZero website. They are also simultaneously made available on all channels, with no privileged customer access.
9. BeZero Carbon employees are also required to adhere to its Investment Compliance policy which prohibits them to invest in, hold or trade in carbon credits issued by individual projects (exchange traded instruments are permitted) during the course of their employment. They are also required to provide annual declarations and reaffirmation of adherence to this policy.
10. BeZero Carbon does not engage in developing carbon projects. We also do not provide any recommendations or consulting services on our ratings; we are a neutral opinion provider. We do not advise clients on any part of the auditing, accreditation or MRV processes. We do not facilitate introductions between buyers and sellers of credits through our platform or otherwise.

Annexe 1: BeZero organisation structure



Updates and reviews

Version number	Date	Description
1.00	27/02/24	Initial release
1.01	01/07/24	Minor content updates
1.02	14/08/24	Minor content updates
1.03	17/04/25	Review

Disclaimer

The BeZero Carbon Rating of voluntary carbon credits represents BeZero Carbon's current opinion on the likelihood that carbon credits issued by a project achieve a tonne of CO₂e avoided or removed. The BeZero Carbon Rating and other information made publicly available or available through the BeZero Carbon Markets platform ("Content") is made available for information purposes only. The Content and in particular the BeZero Carbon Rating sets out BeZero Carbon's opinion on a particular carbon credit or project based on publicly available information as at the date expressed and BeZero Carbon shall have no liability to anyone in respect of the Content, opinion and BeZero Carbon Rating. The Content is made available for information purposes only and you should not construe such Content as legal, tax, financial or investment advice. The Content is a statement of opinion as at the date expressed and does not constitute a solicitation, recommendation or endorsement by BeZero Carbon or any third party to invest, buy, hold or sell a carbon credit. The Content is not a statement of fact and should not be relied upon in isolation. The Content is one of many inputs used by stakeholders to understand the overall quality of any given carbon credit. BeZero Carbon shall have no liability to you for any decisions you make in respect of the Content. If you have any questions about BeZero Carbon, the BeZero Carbon Rating, the BeZero Carbon Rating methodology, qualifying criteria, rating process, any element of Content, the BeZero Carbon Markets platform or otherwise please contact us at: commercial@bezerocarbon.com.