



COMPLAINTS AND REASONED CONCERNS HANDLING POLICY

Version 1.0 - June 2026

1. OVERVIEW

Clarity AI Group is committed to upholding the highest standards of ethics and integrity in delivering Environmental, Social, and Governance (ESG) ratings. This Complaints and Reasoned Concerns Handling Policy outlines the approach to handle dissatisfaction regarding its ESG Rating Activities in a timely and fair manner.

2. PURPOSE

This Policy sets the principles and approach taken by Clarity AI to handle dissatisfaction in respect to its ESG Rating Activities in a timely and fair manner, ensuring that the provision of ESG ratings by the Regulated Entity is independent, impartial, systematic and of adequate quality according to Clarity AI's integrity principles. This framework distinguishes between and applies to Complaints and Reasoned Concerns.

3. SCOPE

This policy applies to all communication received by Clarity AI expressing dissatisfaction in respect to the provision of ESG ratings and the related ESG Rating Activities. This policy applies to all Clarity AI Group Personnel.

4. COMPLAINTS AND REASONED CONCERNS

The communication received by Clarity AI expressing dissatisfaction in respect to the provision of ESG ratings and the related ESG Rating Activities is categorized into two distinct frameworks.

4.1. Complaints

A **Complaint** is a written or verbal statement of dissatisfaction, by an eligible Complainant, regarding a group of or an individual ESG ratings, on at least one the following topics:

- (a) the sources of data used for an individual ESG rating, factual errors and mistakes;
- (b) the way in which the rating methodology in relation to an individual ESG rating has been applied
- (c) whether an individual ESG rating is representative of the rated item or the issuer of the rated item

A **Complainant** is a natural or legal person, that has already lodged a complaint and that is:

- (a) a User of ESG ratings; and/ or
- (b) a Rated item or a representative thereof; and/ or
- (c) an issuer of rated items or a representative thereof.

4.2. Reasoned Concerns

A **Reasoned Concern** is a written or verbal statement of dissatisfaction, by a Relevant Stakeholder, on matters related to the provision of ESG ratings that:

- (a) is not a complaint; AND
- (b) is in respect to alleged non-compliance with the ESG ratings regulation (Regulation 2024/3005)

A **Relevant Stakeholder** is a natural or legal person including, but not limited to:

- (a) A client or a user of ESG ratings;
- (b) A rated item or an issuer of a rated item
- (c) A person accessing Clarity AI publicly available information
- (d) Any stakeholder/ industry organization

4.3. Exclusions

Communications that do not constitute either a Complaint or a Reasoned Concern, are not in scope for this policy and include but are not limited to:

- (a) Standard requests for information or general inquiries.
- (b) General disagreement with the methodology or products that do not allege error or non-compliance.
- (c) Communication with respect to any other activities carried out by Clarity AI, that are not related to the provision of ESG ratings
- (d) Contractual disputes and claims relating to technical malfunction of Clarity AI services.
- (e) Communications from Regulators/Public Authorities acting in their official capacity.

Communications referred to in (a) to (c) will be managed by the relevant customer support teams.

Communications referred to in (d) and (e) shall be immediately forwarded to Legal & Compliance and will be managed by this team.

5. PRINCIPLES THAT UNDERPIN COMPLAINTS AND REASONED CONCERNS HANDLING

- 5.1. **Accessibility:** Channels for submission of either a Complaint or a Reasoned Concern are clear and accessible, on Clarity AI's website. Such channels include specific applications and/or dedicated email.
- 5.2. **Confidentiality:** Complaints and Reasoned Concerns are subject to confidentiality rules and the identity of the Complainant and/ or Relevant Stakeholder is protected. Handling thereof is also subject to whistleblowing protections rules, if and where applicable.
- 5.3. **Independence and Fair handling:** Investigations are carried out independently, under Compliance Function independent oversight and coordination. Depending on the subject

matter of dissatisfaction, relevant team members with appropriate expertise are appointed as reviewers. The review team is impartial, and reviewers are free from conflicts of interest.

- 5.4. **Timely resolution:** Investigation and resolution timelines depend on the complexity of each Complaint or Reasoned Concern. Clarity AI is committed to investigating and communicating the outcome of such investigation within a reasonable period of time, unless such communication is contrary to applicable law. Where not prescribed otherwise by applicable law, the reasonable period of time is estimated at 4 weeks from the date of confirming the receipt of such Complaint of Reasoned Concern.
- 5.5. **No retaliation:** Retaliation against a sender is strictly prohibited, even if the investigation does not confirm any wrongdoing.

6. COMMUNICATION CHANNELS

6.1. Complaints are submitted via one of the following channels:

- (a) Dedicated email at: complaints@clarity.ai

6.2. Reasoned concerns are submitted via one of the following channels:

- (a) Dedicated email at: reasonedconcerns@clarity.ai

7. COMPLAINTS AND REASONED CONCERNS HANDLING

- 7.1. Upon receipt of either a Complaint or a Reasoned Concern, Clarity AI will provide the sender with a confirmation of receipt within 2 working days
- 7.2. Under the Compliance Function coordination and oversight, a review team is assigned to investigate the matter.
- 7.3. The review team has unrestricted access to any and all information relevant to the matter and is subject to confidentiality and non-disclosure obligations.
- 7.4. The review team can choose the investigation means as it deems appropriate. Such investigation means include but are not limited to: desk review of relevant documents, interview with relevant people, audit logs from the relevant systems, request information from service providers, etc.
- 7.5. All Clarity AI Group Personnel are expected to provide full support to the review team, for a timely investigation and resolution of the matter.
- 7.6. Once the investigation is completed, the review team documents the steps taken and the findings in a report, explaining whether the Complaint or the Reasoned Concern is

confirmed or not, the required remediation measures and their timelines, as the case may be.

7.7. A summary of the findings, and an overview of the remediation measures, if relevant, are communicated to the sender.

7.8. Clarity AI maintains a register with all Complaints and Reasoned Concerns, their resolution and communication timelines. It also retains all relevant records for a period of no less than 5 years, unless otherwise mandated by applicable law.

8. FURTHER INFORMATION

In case of questions about this Policy, its applicability or any other queries in its respect, contact the Compliance Function of Clarity AI.

9. POLICY REVIEW

This Policy is reviewed on a yearly basis or as needed, by Clarity AI Compliance Function.

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