



Ratings Review and Release Policy

Applicable to: All Sylvera employees

Scope: Global

Version: V3

Effective Date: 1 March 2024

POLICY

1. This Policy sets out how Sylvera ensures its Opinions are reviewed and subject to quality control prior to publication or dissemination. Sylvera makes clear to its Users that Screenings, Assessments and Ratings are different products and subject to different procedures, including in respect of quality control. Users should be aware of these differences when considering the Opinion.

Ratings

2. Ratings issued by Sylvera are approved by the Ratings Committee and not by individual Analysts. The Ratings Committee, or a body performing a similar function, must approve each Rating prior to its publication.
3. A Primary Analyst will not submit a Rating to the Ratings Committee unless it has sufficient, reliable information on which to base that Rating. If a Primary Analyst has insufficient or unreliable information they may decide, following internal consultation, to contact the Project Proponent in accordance with the Project Developer Relationship and Grievance Policy, to terminate the review of the relevant Project, or to propose a Provisional Rating. A decision of sufficiency is not an audit, and Sylvera relying upon any information does not give any guarantee of its accuracy. Sylvera may determine to suspend or withdraw a Rating if it no longer considers the available information to be sufficient or reliable, but any such decision shall be taken in accordance with the Monitoring and Amendments to Ratings Policy.
4. The composition of the Ratings Committee and the processes it follows depends on the nature of the Project underlying the relevant Rating. The Ratings Committee makes Rating Decisions based upon an analysis of relevant information made available to Sylvera during the Project review.
5. Each member of the Ratings Committee is jointly responsible for ensuring that:
 - a. The Ratings Committee is properly constituted;
 - b. The relevant Framework has been correctly applied to the relevant Project; and
 - c. All relevant information has been assessed in arriving at the proposed Rating.

The Ratings Committee shall operate in accordance with its Terms of Reference.

6. Commercial Personnel shall not be eligible to attend or participate in a meeting of the Ratings Committee. Under no circumstances may a Sylvera Employee attend or vote in a meeting of the Ratings Committee if they have an actual or potential conflict of interest.
7. All decisions of the Ratings Committee shall be taken on an at least majority basis with voting by way of show of hands or digital equivalent.
8. Once the Ratings Committee has made a Rating Decision, Sylvera's overriding objective is to disseminate the Rating to Users as soon as possible. In order to ensure the timely and consistent dissemination of information, all Ratings are released in accordance with the Confidential Information and Material Non-Public Information Policy.

Assessments and Screenings (and Provisional Ratings)

9. Screenings and Assessments of Projects may be conducted for Users. The purpose of a Screening or Assessment is to generate an opinion more quickly and/or by reviewing less data than a full Rating in order to allow a User to take a faster decision with respect to a Project, or to take a decision at a stage of the Project where that data is not yet available (i.e., Pre-Issuance).
10. Screenings and Assessments are therefore subject to fewer quality controls than a Rating and may not be subject to developer engagement. Specifically, whilst Sylvera will maintain quality controls to oversee the work of a Primary Analyst prior to dissemination, neither Screenings nor Assessments are subject to the oversight of the Ratings Committee. Further, a Screening or Assessment may be conducted in the absence of an applicable Framework for that Project type (see Frameworks Policy).
11. Furthermore, whilst Sylvera shall endeavour to apply the same scrutiny to the data that it uses to generate a Screening or Assessment, the data is more likely to be non-public data that has been subject to less third party scrutiny and therefore gives rise to a higher likelihood of errors.
12. Lastly, Pre-Issuance Screenings, Assessments and certain Provisional Ratings are typically reliant on non-public data, conducted at the request of a User, often used in competitive Project investment processes and/or delivered in advance of their being an active market for the Project's credits. Users may wish to understand Sylvera's assessment of a Pre-Issuance Project in order to provide financial support to it to ensure that it can achieve its environmental and social ambitions in a timely fashion. Users may have access to Confidential Information about a Pre-Issuance Project and ask Sylvera to generate a Pre-Issuance Screening or Assessment using it. There is therefore a legitimate expectation given the sharing of Confidential Information and competitive investment process that Sylvera does not share a Pre-Issuance Screening or Assessment based on the User's Confidential Information with another User.
13. Sylvera considers driving financing toward high quality, high integrity Pre-Issuance Projects to be of significant public interest, but acknowledges the risk of creating imperfect information within carbon markets. Sylvera will therefore maintain guardrails to ensure that it can always publish a Rating for a Project once there is sufficient publicly available information to do so, and to ensure that it can conduct a Pre-Issuance Screening or Assessment of a Project for a

different User that has access to the same or similar Confidential Information.

14. Sylvera also reserves the right to not release a Provisional Rating to all Users simultaneously if it has been prepared immediately prior to the Project starting to issue credits, however wherever feasible shall treat such scenarios equivalently to the release of a full Rating.

Ratings Oversight Committee

15. All activities relating to Opinions, and adherence with the Policies, shall be ultimately overseen by, and accountable to, the Ratings Oversight Committee. The Ratings Oversight Committee shall operate in accordance with its Terms of Reference.