

S&P Global ESG Ratings Europe Limited

Complaints Handling Policy

Issued by: S&P Global Sustainable1 Compliance

Applies to: S&P Global Energy ESG Ratings Europe Limited

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1. Use of this document

This document provides S&P Global ESG Ratings Europe Limited* (“SPGE ESG REL”) customers, users of ESG Ratings, rated entities, issuers, and other interested stakeholders with a high-level overview of the SPGE ESG REL Complaints Handling Policy. S&P Global does not make detailed internal documents, which may contain specific procedures and controls, publicly available. This document is generally reviewed annually but may be reviewed and updated at any time. This document is aligned to current policies and shall not be construed as an offer, contract, or representation that may be relied upon, unless expressly agreed by S&P Global in writing.

2. Policy/Statement content

Complaints Handling Mechanism

SPGE ESG REL strives to provide information of the highest standards and to conduct its business with integrity. Stakeholders who have concerns regarding an ESG Rating may submit a complaint to:

S1ClientComplaints@spglobal.com

Complaints may relate to one or more of the following categories:

- The data sources used for an individual ESG Rating;
- Alleged factual errors, inaccuracies, or mistakes in an individual ESG Rating;
- The manner in which a published methodology was applied to an individual ESG Rating; or
- Whether an individual ESG Rating appropriately reflects the rated entity or the issuer of the rated item.

To facilitate an effective review, complaints should include sufficient information to support investigation of the matter.

Matters Not Considered Complaints

The following would not ordinarily be considered complaints:

- General inquiries or requests for information;
- Requests for an explanation or clarification of a published methodology;

- General feedback, comments, or disagreement regarding the design, assumptions, criteria, weightings, or analytical approach of a published methodology;
- General product, service, or process-related inquiries that do not relate to an individual ESG Rating.

Assessment of Submission

SPGE ESG REL will assess each submission to determine the appropriate process for handling the matter. Submissions that fall within the complaint categories described above will be handled in accordance with this Complaints Handling Policy and accompanying SOP. Matters that do not fall within those categories may be directed to the relevant business area or function for further review, response, or handling, as appropriate.

Review and Investigation

SPGE ESG REL will seek to investigate and resolve complaints as promptly as possible. Complaints are reviewed independently and managed in accordance with the applicable SPGE ESG REL complaints handling SOP.

Individuals responsible for investigating complaints will be independent from the activity, analytical output, or rating determination of the ESG Rating about which the complaint is made.

Reasoned concerns relating to ESG Ratings and associated activities will be assessed in accordance with applicable regulatory requirements.

Acknowledgement and Response Timeline

SPGE ESG REL will acknowledge receipt of a complaint within 3 business days of receiving the complaint.

SPGE ESG REL will seek to respond to complaints as quickly as possible. In most cases, a written response will be provided within 30 business days.

If additional investigation is required, the complainant will be informed of the reason for the delay and the expected timing of the final response.

Escalation

- Complaints involving fraud, misconduct, conflicts of interest or legal risk may be escalated to Legal, Compliance, or other appropriate functions.

Post-Response and Closure

After receiving the initial response, the complainant may:

- Provide additional information and request further investigation; or
- Accept the response.

If the complainant takes no further action within 25 days of the response, the complaint will be closed.

Records and Oversight

SPGE ESG REL retains records relating to complaints, investigations, communications, findings, and resolution activities in accordance with applicable record retention requirements.

The Internal Oversight Committee reviews complaints to identify trends and issues that may create risks covered by the Complaint Handling Policy.

3. Disclaimers

This document has been prepared by SPGE ESG REL a subsidiary of S&P Global Inc. (collectively, “S&P Global”) to provide an overview of the complaints handling mechanism adopted by SPGE ESG REL in relation to ESG Ratings pursuant to the applicable regulatory requirements, including Regulation (EU) 2024/3005 on the transparency and integrity of ESG rating activities. Nothing in this document intends to or limits or modifies any obligation imposed on SPGE ESG REL by applicable law or regulation. This document may be updated from time to time to reflect changes in regulatory requirements, internal procedures, or business practices.

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Revision History

Revision Date	Summary of Key Changes
September 03, 2026	Draft redaction and Initial Release