

# CONFIDENTIALITY POLICY

Details	
Primary Owner	Compliance
Applies to	CRISIL Limited and its subsidiaries
Version	V.01.2022
Last review date	November 15, 2022
Review cycle of document	Annual (once every calendar year)

Argentina | China | Hong Kong | **India** | Poland | Singapore | UK | USA

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**CRISIL**  
An S&P Global Company

## **I. Applicability and Purpose**

This Confidentiality Policy applies to all the Employees<sup>1</sup> of CRISIL Limited, and its subsidiaries, if any (CRISIL).

The Employees acknowledge that in the ordinary course of business, they may receive or have access to or handle information that is not publicly available and/or is proprietary information. Employees shall take all reasonable measures to protect all information belonging to or in the possession of CRISIL and keep it confidential and avoid any unauthorised dissemination, directly or indirectly. Hence, the purpose of this Confidentiality Policy is to protect any information that is not in public domain and is proprietary and/or confidential to CRISIL, its clients and suppliers.

## **II. Confidential Information**

“**Confidential Information**” for the purpose of this Confidentiality Policy shall be any information which is not available in the public domain and shall include but not limited to: any document, email, information, discovery, invention, improvement, patent specification, formulations, plans, ideas, books, accounts, data, reports, drafts of documents of all kinds, correspondence, client information, lists and files, decisions, information about Employees or suppliers, strategies, drawings, recommendations, designs, office precedents, policies and procedures, budget and financial information in any form, i.e. physical, electronic, electromagnetic or otherwise is commercially valuable such as trade secrets, confidential information and proprietary information concerning products and services (both those already in the market and those being developed) are special, valuable and unique assets of CRISIL and shall include information procured or received from the clients of CRISIL during various business engagements shall also be considered as confidential in nature whether or not the same has been explicitly marked as confidential or not.

## **III. Confidentiality Requirements**

Employees in possession of Confidential Information shall comply with the following:

- Keep all such information confidential;
- Respect and maintain the confidentiality of all Confidential Information related to CRISIL or its activities and all non-public information obtained in the performance of the Employee's duties about CRISIL's customers, clients or applicable third parties;
- Only use Confidential Information solely for the purposes of performing their duties as an Employee of CRISIL;
- Only disclose Confidential Information to persons who have a need to know and with an obligation to keep it confidential;
- Shall desist from copying or disseminating internal communications, whether or not marked confidential, to third parties (unless the Employee is providing information to a regulator or government agency);
- Employees shall not use for any purpose or disclose to others any Confidential Information or nonpublic information whether marked confidential or not, including sending confidential and/or internal work materials to personal email accounts. For example:
  - i Employees possessing unpublished price sensitive information about CRISIL shall not use such information to trade in CRISIL's securities, nor divulge such non-public information to other persons to trade in CRISIL's securities;

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<sup>1</sup> Includes Off-roll, contract personnel, consultants, retainers and any other personnel as may be included from time to time.

- ii Employees obtaining unpublished price sensitive information about another company or securities shall not trade in the securities of such other company until such non-public information becomes publicly known.
- Trade secrets, confidential information and proprietary information concerning products and services (both those already in the market and those being developed) are special, valuable and unique assets of CRISIL. Employees should hold all trade secrets and other confidential or proprietary information in strictest confidence and should not use such trade secrets or confidential or proprietary information in any way other than in performing their duties as employees;
- Trade secrets and other confidential or proprietary information shall not be misappropriated, transferred or disclosed, directly or indirectly, to any person or entity. This obligation remains in effect even after an Employee leaves CRISIL;
- No Employee may, without appropriate approval disclose to any person in advance of publication by CRISIL, details pertaining to any rating, grading or any other information on any product or service of CRISIL in any medium;
- Comply with confidentiality obligations under agreement signed with the client and/or other third parties.
- When in doubt, employee should treat information acquired in the course of employment at CRISIL in strictest confidence and consult Compliance team for clarification
- On identification of any breach or non-compliance of this policy, immediately bring it to attention of Compliance team

Nothing in this section shall prohibit or restrict an Employee/personnel from initiating communications directly with, or responding to an inquiry from, or providing testimony before, the applicable regulatory authority.

No written document containing Confidential Information must be left visible where it can be read by anyone. This includes telephone messages, computer prints, letters and other documents. All hardware containing confidential information must be housed in a secure environment.

#### **IV. Firewalls**

- To prevent the misuse of Confidential Information, CRISIL will have firewalls between departments that routinely have access to confidential client information and departments that do not.
- Employees will be given Confidential Information only on a “need to know” basis. Employees dealing with Confidential Information shall not communicate such information to anyone other than on a “need to know” basis.
- Demarcation of various departments will be implemented by CRISIL. If an Employee needs access to information which is otherwise not available to him/her, for legitimate business purposes (i.e., “crossing the firewall”), he/she may access the same only after approval by the Compliance Officer and the respective Business Head. In such cases restrictions which are normally associated with access to such information will be applicable to the concerned Employee.

#### **V. Disciplinary Action**

CRISIL takes violations of this Confidentiality Policy seriously. Failure to comply with this Confidentiality Policy, could result in disciplinary action up to, and including, termination of employment.

Any ex-Employee found to be in breach of this Confidentiality Policy (while in employment with CRISIL) shall be subject to legal action and dependent upon the circumstances of the breach, including cancellation / withdrawal of any or all benefits if extended to the ex-Employee by the Company.

## **VI. Relationship to other Policies**

This Confidentiality Policy, where relevant, should be read in conjunction with the appointment letter and/or employment contract applicable to CRISIL's Employees and personnel, and other work rules, policies and procedures applicable to such Employees and personnel and all other applicable policies.

**REVIEW HISTORY**

<b>Version No</b>	<b>Date of review</b>	<b>Effective Date</b>
V.01.2022	November 15, 2022	November 18, 2022
V.01.2021	June 09, 2021	June 17, 2021
2019.10.01	October 15, 2019	October 15, 2019

## **About CRISIL**

CRISIL is a global, agile and innovative analytics company driven by its mission of making markets function better. We are India's foremost provider of ratings, data, research, analytics and solutions. A strong track record of growth, culture of innovation and global footprint sets us apart. We have delivered independent opinions, actionable insights, and efficient solutions to over 100,000 customers.

We are majority owned by S&P Global Inc., a leading provider of transparent and independent ratings, benchmarks, analytics and data to the capital and commodity markets worldwide.

## **CRISIL Privacy Notice**

CRISIL respects your privacy. We may use your contact information, such as your name, address, and email id to fulfil your request and service your account and to provide you with additional information from CRISIL. For further information on CRISIL's privacy policy please visit [www.crisil.com](http://www.crisil.com).