

GCR

RATINGS

CODE OF
PROFESSIONAL
CONDUCT

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Policy Name	Code of Professional Conduct
Applicable to	All GCR Employees
Scope	Global
Reviewed by	Compliance
Approved by	Group Head of Legal & Compliance, Board of Directors
Last Review Date	21/10/2025
Next Review Date	This policy shall be reviewed annually, with the next review due on [14/11/2025]

1. Introduction

- 1.1. As a credit rating agency GCR subscribes to the principles of the International Organisation of Securities Commissions' ("IOSCO") Code of Conduct Fundamentals for Credit Rating Agencies, as revised at March 2015 ("the Code"). The Code in conjunction with the Statement of Principles regarding the Activities of Credit Rating Agencies forms the foundation of GCR's Code of Professional Conduct. Further, GCR, endeavours to show its compliance with the laws, regulations, rules, standards and principles under the license and the territory within which it operates.
- 1.2. GCR aims to provide objective, timely and independent credit opinions. GCR is committed to the core principles of objectivity, independence, integrity and transparency and will deal fairly and honestly with issuers, investors, other market participants and the public. In doing so GCR upholds its responsibility as a credit rating agency to rated entities, obligors, originators, underwriters, arrangers and all users of credit ratings.
- 1.3. It is GCR's vision to ensure the independence of the credit rating process and the absence of any influences which may bring it into question. Our goal is to ensure confidence in the credibility of the credit ratings provided by GCR to the marketplace. We seek to play a supportive role and to contribute to the overall stability of the marketplaces in which GCR's credit ratings are used.

2. Quality of the Credit Rating Process

- 2.1. GCR shall establish, maintain, document and enforce a credit rating methodology for each class of entity or obligation for which GCR issues credit ratings. Each credit rating methodology is rigorous, capable of being applied consistently and where possible GCR's credit ratings can be subjected to some form of objective validation based on historical experience.
- 2.2. The credit ratings that GCR issues shall be based on a thorough analysis of all information known and believed to be relevant to GCR and consistent with the applicable credit rating methodology that is in effect. This shall be based on a framework of established, maintained, documented and enforced policies and procedures which reinforce the analysis conducted by GCR.
- 2.3. GCR shall take reasonable steps to ensure that the appropriate knowledge and expertise, together with the information used by GCR in the determination of credit ratings is of sufficient quality and reliability to support credible credit ratings.

- 2.4. In circumstances where GCR does not have appropriate knowledge, expertise and information at its disposal to form a credible rating opinion for the type of rating being considered, GCR avoid issuing credit ratings for the particular entity or obligation.
- 2.5. In assessing creditworthiness, GCR's analysts shall make use of a credit rating methodology that is relevant and established by GCR for the type of entity or obligation being rated. The methodology shall be applied in an appropriately consistent manner across all entities and obligations for which that methodology is used.
- 2.6. GCR shall define the meaning of each category in its rating scales and apply those categories in a generally consistent manner across all classes of rated entities and obligations to which a given rating scale applies.
- 2.7. All GCR's credit ratings shall be assigned, approved or issued by GCR as a credit rating agency and not by a particular analyst, employee or group thereof.
- 2.8. GCR shall assign analysts whom, individually or collectively, have the appropriate knowledge, skill and experience to assess the creditworthiness of the type of entity or obligation being rated.
- 2.9. GCR shall maintain adequate internal records relating to its credit rating activities. These records shall be in line with GCR's recordkeeping policies for various reasons, including regulatory requirements, compliance review and training purposes.
- 2.10. GCR shall establish, maintain, document and enforce policies and procedures that ensure that the credit ratings and reports issued by GCR are of sufficient quality as to the general creditworthiness of the rated entity or obligation.
- 2.11. GCR shall ensure that sufficient resources are devoted to carrying out and maintaining credible, quality credit ratings. This assurance is based on the consideration that GCR shall have a sufficient number of analysts, with the requisite knowledge, skills and access to sufficient information, whom are available to devote to the credit rating of an entity or obligation.
- 2.12. GCR may establish and maintain a review function made up of one or more senior managers with appropriate experience to review the feasibility of providing a credit rating for a type of entity or obligation that is materially different from the entities or obligations GCR currently rates.
- 2.13. GCR shall establish a formal review committee, with suitable experience, which shall be responsible for the periodic review of GCR's credit rating methodologies (including models and key assumptions) and any significant changes to credit rating methodologies. This function shall be independent from the business lines that are responsible for rating various classes of issuers and obligations.
- 2.14. In determining the analyst or team of analysts whom will participate in determining a credit rating GCR shall seek to promote continuity whilst avoiding bias in the credit rating process.

2.15. GCR shall ensure that adequate analytical and financial resources are allocated to monitoring and updating all its credit ratings. Once GCR publishes a credit rating, the credit rating shall be monitored and updated in line with its policies and procedures on an ongoing basis by:

- Reviewing the creditworthiness of the rated entity or obligation regularly and as described in the Rating Process Manual.
- Initiating a review of the status of the credit rating upon becoming aware of any information that might reasonably be expected to result in a credit rating action, consistent with the applicable credit rating methodology.
- Reviewing the impact of and applying a change in the credit rating methodologies, models or key assumptions on the relevant credit ratings within a reasonable time.
- Updating in a timely manner the credit rating, as appropriate, based on the results of the review; and
- Incorporating all cumulative staff experience obtained.

2.16. If GCR uses a separate analytical team to the team which accorded the initial credit rating, for monitoring a credit rating, GCR shall ensure the requisite level of expertise and resources to perform their review function in a timely manner be available.

2.17. Which accorded the initial credit rating, GCR shall seek to ensure the requisite level of expertise and resources to perform their review function is available in a timely manner.

2.18. GCR reserves the right to withdraw any rating at any time for any reason, including without notice. In particular GCR reserves the right to withdraw a rating, including without notice, in instances where a rating committee determines that GCR lacks sufficient information to maintain its rating or that any information provided to GCR is unreliable or contains misrepresentations or is misleading. In the event that a public rating is withdrawn, GCR shall publish a rating announcement that includes the current rating(s) where appropriate, and states that the rating(s) has been withdrawn, the reason for the withdrawal, and that GCR will no longer provide the rating(s) or analytical coverage of the issuer or obligor.

3. Integrity of the Credit Rating Process

3.1. GCR and its staff shall deal honestly and fairly with rated entities, obligors, originators, underwriters and users of credit ratings.

3.2. GCR's staff shall be held to the highest standards of integrity and ethical behaviour. As a principle, GCR shall seek to hire staff whom are fit and proper for the position in which they are to serve.

3.3. GCR and its employees shall not, either implicitly or explicitly, give any guarantee or assurance to an entity subject to a credit rating action, obligor, originator, underwriter, arranger or user of GCR's credit ratings about the outcome of a particular credit rating action.

- 3.4. GCR and its staff shall not make any promises or threats about potential credit rating actions to influence rated entities, obligors, originators, underwriters, arrangers or users of GCR's credit ratings to pay for credit ratings or other services.
- 3.5. GCR and its staff shall not make any proposals or recommendations regarding the activities of rated entities or obligors that could impact upon the credit rating of the rated entity or obligation, including but not limited to proposals or recommendations on corporate or legal structures, assets and liabilities, business operations, investment plans, lines of financing, business combinations or the design of any structured finance product.
- 3.6. GCR shall establish, maintain, document and enforce, through its Compliance Officer and the compliance function, policies, procedures and controls in order to assess that GCR and its staff comply with its Code of Conduct, applicable laws, regulations, standards and principles to which GCR subscribes.
- 2.19. Upon becoming aware of any employee or affiliate of GCR being or having been involved in conduct, which is illegal, unethical or contrary to this Code of Conduct, GCR employees shall report the matter to the GCR Compliance Officer. Upon receiving such report, GCR Compliance shall take appropriate action in accordance with its applicable internal policies and procedures. No GCR employee making such as disclosure or report to the GCR Compliance Officer shall be subjected to any adverse treatment or retaliation as a result.

4. Independence And Avoidance of Conflicts of Interest

- 4.1. GCR shall not delay or refrain from taking a credit rating action based on the potential effect of the action on GCR, a rated entity, obligor, originator, underwriter, investor or any other market participant.
- 4.2. GCR and its employees shall exercise care and professional judgment to maintain both the substance and appearance of GCR's independence and objectivity and that of its employees.
- 4.3. GCR's determination of a credit rating shall be influenced only by factor relevant to assessing the creditworthiness of the rated entity or obligation.
- 4.4. GCR shall separate its credit rating business and the analysts from any other business of GCR that may present a conflict of interests.
- 4.5. GCR shall establish, maintain, document and enforce policies, procedures and controls to identify and eliminate, or disclose and manage, as appropriate, any actual or potential conflicts of interest that may influence its credit rating methodologies, credit rating actions, or analyses of GCR or the judgment and analyses of the employees of GCR.
- 4.6. GCR shall disclose and document actual and potential conflicts of interest in a complete, timely, clear concise, specific and prominent manner.

- 4.7. If a potential or actual conflict of interests is unique to a specific credit rating action with respect to a particular rated entity, obligor, originator, lead underwriter, arranger or obligation such conflict shall be disclosed in the same form and through the same means as the relevant credit rating action.
- 4.8. GCR shall disclose the general nature of its compensation arrangements with rated entities, obligors, lead underwriters or arrangers.
- 4.9. GCR shall not hold or transact in trading instruments presenting a conflict of interest with GCR's credit rating activities.
- 4.10. In instances where rated entities or obligors (e.g. sovereign nation or state) have, or are simultaneously pursuing oversight functions related to GCR, the employees responsible for interacting with the officials of the rated entity or the obligor regarding the supervisory matters shall be separate from the employees that participate in taking credit rating actions or developing methodologies that apply to such rated entity or obligor.
- 4.11. GCR shall structure its reporting lines and compensation arrangements in such a way as to effectively manage or eliminate any actual or potential conflicts of interest.
- 4.12. GCR's employees who participate in or who might otherwise influence a credit rating action shall not initiate or participate in discussions with rated entities, obligors, arrangers or subscribers regarding fees or payments charged to such rated entity, obligor, arranger or subscriber.
- 4.13. A GCR employee shall not participate in or otherwise influence a GCR credit rating action with respect to an entity or obligation if the employee, an immediate family member of the employee (e.g. spouse, partner, major or minor, son or daughter), or an entity managed by the employee presents a conflict of interests in terms of GCR's policies and procedures and applicable laws, regulations or standards.
- 4.14. A GCR analyst should not hold or transact in a trading instrument issued by a rated entity or obligor in the analyst's area of primary analytical responsibility subject to GCR's policies and procedures and applicable laws, regulations or standards.
- 4.15. GCR employees are prohibited from soliciting money, gifts or favours or cash equivalents thereof in breach of GCR's policies and procedures.
- 4.16. Should a GCR employee become involved in a personal relationship that creates an actual or potential conflict of interest, GCR shall require that employee to disclose such relationship to the GCR Compliance Officer.
- 4.17. GCR shall establish, maintain, document and enforce policies, procedures, controls and timeframes for reviewing the past work of an analyst who leaves the employ of GCR and joins an entity that the employee participated in rating, an obligor the employee participated in rating, an originator, underwriter or arranger the employee had significant dealings with as part of his or her duties at GCR.

5. Transparency And Timely Credit Rating Disclosure

- 5.1. GCR shall assist the users of its credit ratings in developing an understanding of its credit ratings to better their knowledge in the nature, limitations and risk of placing undue reliance on credit ratings when making investment or other financial decisions.
- 5.2. GCR shall not state that its credit ratings are endorsed by any authority which regulates GCR, and GCR's registration status is not, directly or indirectly linked to, or a reflection of the quality of GCR's credit ratings.
- 5.3. GCR shall disclose sufficient information about its credit rating process and its credit rating methodologies so that users of GCR's credit ratings can understand how the credit rating was determined.
- 5.4. GCR shall disclose, in a non-selective manner, any material modifications to its credit rating methodologies prior to the modification taking effect.
- 5.5. GCR shall disclose its policies and procedures regarding unsolicited credit ratings.
- 5.6. GCR shall disclose its policies and procedures for the distribution of credit ratings and reports and its policies and procedures regarding the withdrawal (discontinuation) of credit ratings.
- 5.7. GCR shall disclose clear definitions of the meaning of each of its ratings scales, together with its definition of default.
- 5.8. GCR shall differentiate credit ratings of structured finance products from the credit ratings of other types of entities or obligations through a different rating identifier with an explanation of how the differentiation functions.
- 5.9. GCR shall be transparent with investors, rated entities, obligors, originators, underwriters and arrangers about how the relevant entity or obligations will be rated.
- 5.10. GCR may, where feasible and appropriate or required by law, inform the rated entity, or the obligor or arranger of the rated obligation about the critical information and principal considerations upon which a credit rating will be based prior to disseminating a credit rating that is the result or subject of the credit rating action. GCR provides such advance written notification to afford such rated entity, obligor, or arranger an adequate opportunity to clarify any factual errors, omissions or misperceptions that would have a accuracy and references to confidential and/or non-public information. GCR shall evaluate any responses from such issuer, obligor, or arranger and accept them in its sole discretion as appropriate to correct factual errors and remove references to confidential and non-public information.
- 5.11. GCR shall publicly disclose and/or distribute to its subscribers a credit rating that is the result or subject of the credit rating action, as soon as practical after taking such action and on a non-selective basis.

- 5.12. GCR shall disclose with a credit rating that is the result or subject of a credit rating action whether the rated entity, obligor, or originator, or the underwriter or arranger of the rated obligation participated in the credit rating process.
- 5.13. A credit rating not initiated at the request of the rated entity, obligor, originator, the underwriter, arranger or any third party of the rated obligation shall be identified as such.
- 5.14. GCR shall indicate the attributes and limitations of each credit rating, and the extent to which GCR verifies information provided to it by the rated entity, obligor, or originator, or the underwriter or arranger of the rated obligation. For example, if the credit rating involves a type of entity or obligation for which there is limited historical data, GCR shall disclose this fact and how it may limit the credit rating.
- 5.15. GCR shall indicate in the announcement of a credit rating that is the result or the subject of a credit rating action when the credit rating was last updated or reviewed. The credit rating announcement shall indicate the principal credit rating methodology or methodology version that was used in determining the credit rating and where a description of that credit rating methodology can be found. Where the credit rating is based on more than one credit rating methodology, or where a review of only the principal credit rating methodology might cause investors and other users of credit ratings to overlook important aspects of the credit rating, GCR shall explain this fact in the credit rating announcement, and indicate where to find a discussion of how the different credit rating methodologies and other important aspects factored into the credit rating decision.
- 5.16. When rating a structured finance product GCR shall publicly disclose or distribute to its subscriber's sufficient information about its loss and cash-flow analysis with the credit rating, so that investors in the product, other users of credit ratings, and/or subscribers can understand the basis for GCR's credit rating. GCR shall publicly disclose or distribute information about the degree to which it analyses how sensitive a credit rating of a structured finance product is to changes in the assumptions underlying the applicable credit rating methodology.
- 5.17. When issuing or revising a credit rating, GCR shall explain in its announcement and/or report the key assumptions and data underlying the credit rating, including financial statement adjustments that deviate materially from those contained in the published financial statements of the relevant rated entity or obligor.
- 5.18. If GCR discontinues monitoring a credit rating for a rated entity or obligation it may either withdraw the credit rating or disclose such discontinuation to the public or to its subscribers as soon as practical.
- 5.19. Where possible and to promote transparency and to enable investors and other users of credit ratings to compare the performance of different credit rating agencies, GCR shall disclose in standard form sufficient information, inclusive of verifiable, quantifiable historical information organised over a period of time, about the historical transition and default rates of its credit rating categories with respect to the classes of entities and obligations it rates.

6. Governance, Risk Management and Employee Training

- 6.1. GCR's board shall have oversight of, and ultimate responsibility, for ensuring management establishes, maintains, documents and enforces this Code of Conduct which is aligned with the IOSCO Code of Conduct Fundamentals for Credit Rating Agencies.
- 6.2. GCR shall establish an independent risk management function made up of one or more senior level managers or employees with the relevant experience who shall be responsible for identifying, assessing, monitoring and reporting the risks from its activities including but not limited to legal risk, reputational risk, operational risk and strategic risk.
- 6.3. GCR shall establish, maintain, document and enforce policies, procedures and controls which require employees to undergo formal ongoing training, including but not limited to this Code, their responsibilities, protections of information and conflicts of interest, at reasonably regular time intervals.

7. Disclosure And Communication With Market Participants

- 7.1. GCR's disclosures to the public shall be complete, objective, truthful, timely and understandable to investors and other users of credit ratings.
- 7.2. The provisions of this Code are derived primarily from the IOSCO Principles and the IOSCO Code of Conduct Fundamentals for Credit Rating Agencies as at March 2015. However, GCR has made certain modifications to more closely align this Code with GCR's business model and practices.

8. Privacy and the Confidentiality of Information

- 8.1. GCR shall establish, maintain, document and enforce policies, procedures and assessments to ensure the security, integrity, control and processing of confidential or personal information utilised by GCR in the provision of its credit rating services is carried out in a responsible and secure manner within the purposes for which the information was provided to GCR and its staff.
- 8.2. GCR shall adhere to the applicable laws, standards and regulations pertaining to information privacy, protection, permissible provision and security in the provision of its credit rating services.

9. Refusal to Rate Credit Rating

- 9.1. GCR must refuse to issue a credit rating where the quality of information available for assigning a credit rating is unsatisfactory or insufficient or raises serious questions as to whether GCR can provide a credible credit rating.
- 9.2. GCR must refuse to rate if our current criteria/methodologies, rating processes and/or policies do not accommodate or allow for this type of application/request.
- 9.3. GCR may not refuse to issue a credit rating solely because underlying assets or structured finance instruments were previously rated by another CRA. GCR may not, for an anti-competitive purpose, refuse to issue a credit rating, or withdraw or threaten to withdraw a credit rating for a structured finance product on the basis that all or a portion of the underlying assets are not also rated by GCR.



This Code replaces any prior versions of Global Credit Ratings' Code of Professional Conduct or Code of Business Ethics. This Code aligns with principles established by the International Organization of Securities Commissions ("IOSCO") in its Code of Conduct Fundamentals for Credit Rating Agencies, revised March 2015, and IOSCO's Statement of Principles Regarding the Activities of Credit Rating Agencies, published in September 2003.

Failure to comply with this Code and its related policies may result in disciplinary action, up to and including termination of employment.

This Code is available to the public without charge on GCR's Website. By making this Code available to the public, GCR does not assume any responsibility or liability to any third party arising out of or relating to this Code. This Code shall not form a part of any contract with any third party, and no third party shall have any right (contractual or otherwise) to enforce any of this Code's provisions, either directly or indirectly. GCR in its sole discretion may revise this Code to reflect changes in market, legal, and regulatory circumstances and changes to GCR's policies and other controls.

Defined Terms

IOSCO	The International Organisation of Securities Commissions, which sets global standards for securities regulation.
Code of Conduct Fundamentals for Credit Rating Agencies	A set of guidelines established by IOSCO to ensure the integrity and quality of credit ratings.
GCR Code of Professional Conduct:	The code that outlines the ethical and professional standards for GCR's operations, based on IOSCO's Code and the Statement of Principles regarding the Activities of Credit Rating Agencies.
Credit Rating	An assessment of the creditworthiness of a borrower in general terms or with respect to a particular debt or financial obligation.
Integrity of the Credit Rating Process	The principle that GCR and its staff must deal honestly and fairly with all parties involved in the credit rating process and uphold the highest standards of integrity and ethical behavior.
Transparency and Timely Credit Rating Disclosure	The principle that GCR must provide clear, accurate, and timely information about its credit rating processes, methodologies, and any changes to them.
Governance, Risk Management, and Employee Training	Policies and procedures established by GCR to ensure effective oversight, risk management, and ongoing training for employees to maintain high standards of integrity and compliance.
Disclosure and Communication with Market Participant	The requirement for GCR to provide complete, objective, truthful, timely, and understandable disclosures to investors and other users of credit ratings.
Privacy and Confidentiality of Information	Policies and procedures to ensure the security, integrity, and responsible handling of confidential or personal information used in GCR's credit rating services.

