



1. Intentions and protocols

1.1 Integrum ESG is committed to respecting the intellectual property and database rights of all companies whose ESG disclosures and performance it assesses.

1.2 The only data that Integrum ESG downloads from third party websites (an activity often referred to as ‘webscraping’) is public information.

i. Moreover the information that Integrum ESG wishes to ingest to its database, for the purposes of providing its institutional investor clients with insights supported by surfaced company data, has invariably been published by the company with the express intention of making such data openly and freely available to institutional investors and regulators.

1.3 Specific locations on the corporate websites of each company for which we assess ESG data are first either identified either by a proprietary script or by our analysts, and where a script has been used, the locations will still be reviewed by one of Integrum ESG’s analysts in a manual process. Integrum ESG does not use ‘crawlers’ to access and review all available data on a third-party website; only specifically relevant data is identified, and always reviewed in a manual human process, before any downloading occurs. This manual process ensures the following:

i. That only the most relevant data is identified.

ii. That this relevant data is hosted either within an already-published company document (typically an Annual Report, a 10-K, a Sustainability Report or a CSR Report, that is hosted in pdf format on the company’s open access investor relations website, or very occasionally an html document made available at the same location).

iii. That none of these documents are password-protected.

1.4 That the Terms and Conditions (sometimes referred to as ‘Terms of Use’) of the website are located and reviewed by the analyst. Insofar as downloading or reproducing (with direct attribution) the company ESG data we wish to assess is prohibited by these Terms, no data will be downloaded.



1.5 Insofar as downloading or reproducing (with direct attribution) the company ESG data we wish to assess is prohibited by these Terms, Integrum ESG analysts will make direct contact with the Investor Relations team of that company in order to query whether the company has applied these Terms to the specific already-published documents in error. (This has occasionally proved to be the case, and the company has then amended the Terms as published on its website).

i. If such Terms were not applied in error, and the company does not wish any data to be downloaded from its website even though all this data may be freely viewed by any member of the public, Integrum ESG will not download any ESG data and will not include any fundamental data for that company in its database.

ii. It may be the case that this company will have an 'ESG Sentiment Score' within the Integrum ESG database, even if there is no fundamental data for that company in the Integrum ESG database. The 'ESG Sentiment Score' is based on a proprietary assessment of news data provided directly to Integrum ESG under licence by the information company LexisNexis, and Integrum ESG's use of this data is indemnified by LexisNexis.

1.6 Integrum ESG extracts ESG-relevant information from company documents. It has no interest in extracting information from company databases, which may contain data prepared for customers rather than investors and regulators, of commercial value to that company, such that the extraction of this data could possibly constitute an infringement of database rights under UK, European, US, Canadian, Japanese or Hong Kong law.