

# Complaints and Reasoned Concerns Handling

## Our Commitment to Feedback

Glass Lewis provides ESG rating activities as part of our broader suite of research and analytical services. We recognize that our ESG ratings are of interest to a wide range of stakeholders: institutional investors and other users of our ratings, the companies and other entities that we rate, and the public more broadly.

Glass Lewis has always been open to feedback and complaints and has established processes for hearing from those affected by our work. This policy describes how that commitment applies specifically to our ESG rating activities, consistent with our existing complaints process and with our published Statement of Compliance with the Best Practice Principles for Providers of Shareholder Voting Research and Analysis.

This policy applies in addition to, and does not replace, our general feedback and complaints channels, which remain available at [glasslewis.com/compliance/feedback-and-complaints](https://glasslewis.com/compliance/feedback-and-complaints).

## Complaints

Complaints concerning the substance of an individual ESG rating may be submitted by users of ratings, by rated items and by issuers of rated items, and may relate to:

- the sources of data used in determining an individual ESG rating, including any factual errors or mistakes;
- how our rating methodology was applied in determining an individual ESG rating; or
- whether an individual ESG rating is representative of the rated item or the issuer of the rated item.

## Reasoned Concerns

Separately from a complaint about an individual rating, stakeholders may raise a more general concern about our ESG rating activities. To do so, stakeholders must provide their name and position or affiliation, together with a clear explanation of the basis for the concern.

## Submitting and Responding to a Complaint or Reasoned Concern

Feedback, comments, and complaints relating to our ESG rating activities may be submitted through our [Feedback and Complaints Center](#), and should include the minimum information noted above. Doing so allows us to properly record and respond to inquiries.

We are committed to investigating complaints in a timely and fair manner. Submissions are reviewed by personnel who are not involved in determining the individual rating in question, maintaining independence in our review. We will endeavor to provide a substantive response within 30 working days of receipt, unless doing so would conflict with applicable law or regulatory requirements.

## Other Ways to Engage With Us

### For issuers

Any general questions from issuers about our assessments, including questions around individual company assessments, please refer to our [corporate enquiries page](#).

Responses from issuers that are part of Glass Lewis' notification and feedback process should be submitted via the [Additional Documentation Form](#).

If after publication, you would still like to request a copy of your information as an issuer, you can fill out the request for information form in the original publication email.

### General Inquiries

Glass Lewis' Climate Research Team is available at [climateresearch@glasslewis.com](mailto:climateresearch@glasslewis.com)

General inquiries may be made to [info@glasslewis.com](mailto:info@glasslewis.com)

Media inquiries may be made to [media@glassleis.com](mailto:media@glassleis.com)

## Policy Review

This policy is maintained by the Glass Lewis Compliance Department and is reviewed at least annually. We may update this policy from time to time to reflect changes in our processes or in applicable regulatory requirements.