MSCI Fixed Income Benchmark Family – Benchmark Statement

December 2020
Contents

Benchmark Statement: MSCI Fixed Income Indexes 3
1 Objective of the Indexes in the Family 3
2 Methodology and Index Design Guidelines and Reviews 4
3 Index Content Governance 5
4 Index Calculation and Discretion 6
5 Corrections 8
6 Consultations 9
7 Index Terminations 11
8 Index Usage 12
9 ESG Disclosures 13
10 Additional Information 14
Appendix I – Key Terms 15
Benchmark Statement: MSCI Fixed Income Indexes

1 Objective of the Indexes in the Family

1.1 The MSCI fixed income index family is comprised of indexes whose aim is to accurately and objectively measure performance of a market or economic reality as represented by an investment opportunity set accessible to institutional investors based on a market, market segment, theme, or investment strategy. MSCI’s primary fixed income index methodology is the MSCI Corporate Bond Index Methodology. Other fixed income indexes within the family, including custom indexes, are in general derived and maintained based on the universe of securities used by the MSCI Corporate Bond Index. Any exception to this rule would be highlighted in the respective fixed income index methodology books.

1.2 The fixed income universe from which MSCI constructs all of its fixed income indexes is comprised of corporate bonds with fixed coupon rate, domiciled in developed markets. A fixed income index representing a particular market, market segment, theme or investment strategy will reflect the relevant proportion of this universe.

1.3 The categorization of a particular market as developed is based on the MSCI Market Classification Framework.

1.4 The MSCI Corporate Bond Index serves as the parent index for other MSCI fixed income indexes that address specific investment themes such as MSCI Factor Indexes and MSCI ESG Indexes.

1.5 A particular fixed income index will be governed by a number of methodology documents, including the specific fixed income index methodology (as well as a parameter sheet if required), the MSCI Corporate Bond Index Methodology (or any other parent index methodology), the MSCI Fixed Income Index Calculation Methodology, the MSCI Fixed Income Data Methodology and the MSCI Fixed Income Index Policies.

1.6 The MSCI fixed income index family also includes custom indexes that may include specific screens, exclusion lists, or alternative weightings on parent indexes described above.

1.7 The MSCI fixed income index family contains only Non-Significant indexes as defined by Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indexes used as benchmarks.
2  Methodology and Index Design Guidelines and Reviews

2.1 MSCI indexes, regardless of index family, aim to accurately and objectively measure performance of a market or economic reality as represented by an investment opportunity set accessible to institutional investors based on a market, market segment, theme, or investment strategy. MSCI indexes, regardless of index family, are constructed and maintained with the following prime objectives in mind:

- Representativeness
- Replicability
- Efficiency

2.2 The index design objectives are achieved through the use of a transparent rules-based methodological approach to index construction and maintenance.

2.3 MSCI indexes are rebalanced on a regular schedule ranging from daily to annually. The MSCI Corporate Bond Index is rebalanced monthly while the MSCI Fixed Income Factor Indexes are rebalanced on quarterly basis. A rebalancing may also be triggered by conditions specified in the relevant methodology.

2.4 As part of the regular index rebalancing process, MSCI indexes are reviewed relative to the market or strategy they are designed to reflect. This assists in the evaluation of methodologies for both consistency and effectiveness and may highlight situations where changes in the methodology are warranted to reflect changes in the underlying market opportunity.
3  Index Content Governance

3.1 MSCI’s Index Policy Committee (“IPC”) and Fixed Income Index Committee (“FIIC”) preside over content matters relating to its indexes, such as the development and interpretation of MSCI Fixed Income Index methodologies.

3.2 The FIIC is primarily responsible for supervising the design, development, approval and interpretation of index methodologies. The FIIC’s role is to ensure that the design of a given index aligns with the design objectives set forth in section 2 of this document that final decisions are consistent with the relevant index methodology, and that, in complex cases where different interpretations are possible, the right focus is applied. FIIC discussions may be informed by feedback from the investment community. Nonetheless, all decisions taken by the committees are the sole responsibility of its members.

3.3 Additionally, for the MSCI Corporate Bond Index and certain other designated methodologies, all results and analysis related to Index Reviews are presented to, reviewed, discussed, and approved by the FIIC.

3.4 The IPC serves as an escalation point for the FIIC. Relevant topics deemed to have material importance, as determined by the FIIC, are discussed and decided by the IPC.
4 Index Calculation and Discretion

4.1 MSCI indexes in the MSCI fixed income index family are calculated using fixed income security prices provided by internationally recognized data vendors.

4.2 The return of the indexes is determined in a number of currencies including USD, EUR, GBP etc.

4.3 The MSCI Fixed Income Indexes rely on the continued availability of prices from data vendors and permission for MSCI to use such data for determining the MSCI fixed income indexes. To the extent that such data is temporarily or permanently unavailable, MSCI Fixed Income Indexes apply the fallback measures as described in the MSCI Fixed Income Index Calculation methodology.

4.4 The rules for MSCI index construction, maintenance and calculation are contained in publicly available methodology books and complemented with internal guidelines and operating procedures. Each process is conducted by well-trained personnel according to documented rules and operating procedures.

4.5 MSCI’s rules-based index methodologies provide that discretion is not used in the production of the indexes except in unusual cases not effectively addressed by the methodology. These include, but may not be limited to:

- Corporate events not previously encountered or unusually complex in nature,
- Structural changes to the underlying markets,
- Geo-political events,
- Operational issues at data vendors
- Events beyond human control

4.6 Where there may be a need to take an action that is not prescribed in the methodology, senior members across the MSCI Index Research and Data Management departments will develop a proposed approach with the goal of remaining consistent with the goals of the methodology and ensuring timely calculation and distribution. These proposals are reviewed by the FIIC. In cases when time permits, and the cases are deemed material, MSCI may consult with clients on the proposed approach. MSCI will then announce the decided action to all market participants at the same time.

4.7 Typically, MSCI does not perform explicit ex-post analysis of decisions other than through its regular reviews of indexes and methodologies but always welcomes feedback from market participants on decisions made.

4.8 The framework described above eliminates the exercise of discretion by an individual and ensures any required exercise of discretion is managed through escalation to committees of experts. All committees are governed by terms of reference and all
decisions are appropriately documented and archived. The IPC and FIIC currently each have at least 6 members respectively and decisions are reached by consensus.
5 Corrections

5.1 In the case of data errors that occur in the determination or calculation of an index, regardless of index family, if the impact of the error is below a documented threshold as defined in MSCI Fixed Income Index Policy document, no historical index restatement is made.

5.2 If the impact of the error on performance is above the threshold\(^1\) as defined in MSCI Fixed Income Index Policy document at the index level, indexes are restated historically.

5.3 In certain circumstances, such as errors in the list of index constituents (e.g., a security is unintentionally omitted), or the error affects a large number of securities (e.g. a third of the prices in a particular market are in error) MSCI may also correct and restate history, even if the aggregate impact is small.

5.4 MSCI applies a 12-month correction period for index errors. Errors discovered that are older than 12 months are generally not corrected.

5.5 Corrections related to regular index rebalancings or corporate events are assessed on a case by case basis. MSCI typically considers the following factors in determining the most appropriate corrective action: index investability and replicability as well as potential reverse turnover.

5.6 All corrections are announced simultaneously to all market participants.

\(^1\) Current threshold is 5 basis points
6 Consultations

6.1 MSCI indexes, regardless of index family, are regularly reviewed and evaluated by the Index Research team. MSCI conducts consultations before making any material changes to a methodology.

6.2 A consultation begins in general with an announcement giving the highlights of the MSCI proposal(s) and indicating the location of the consultation document on MSCI’s website. The announcement is widely distributed through multiple channels, including the MSCI website, Bloomberg and Reuters, and directly to MSCI's clients. MSCI collects feedback from market participants in a variety of formats including but not limited to in person meetings, calls, mails, surveys, etc. as deemed appropriate. These consultations provide relevant market participants the time and opportunity to comment on any potential changes to the concerned index methodology.

6.3 Once a consultation is closed and MSCI has gathered all required feedback, the FIIC and, if appropriate, the IPC, reviews the feedback and makes a decision. Any decision to implement changes is announced publicly prior to implementation.

6.4 The final decision, including the rationale that has led to it and high-level participation statistics, is communicated publicly to all market participants at once. Most consultation participants request that their feedback remains confidential. MSCI may nevertheless publicly disclose feedback if specifically requested by respective market participants. In that case, the relevant feedback would be published together with the final results of the consultation.

6.5 If the final decision is to change the methodology, it will be part of the announcement, including the timeframe for the implementation of the change. Subsequently, MSCI will update the relevant methodology books.

6.6 The length of a consultation and lead time provided for implementation varies depending on the complexity of the topic, breadth of client impact as well as impact on the index composition and is clearly communicated as part of the consultation process. The length of a consultation needs to be sufficient for market participants to meaningfully review what is proposed and respond.

6.7 For custom indexes, changes to any client specifications are discussed directly with the relevant client.

6.8 In case of methodology changes that are not deemed as material, MSCI may make such changes without launching a public consultation. In such cases, once the methodology changes are approved by the FIIC, they are announced by MSCI to all

---

2 The FIIC determines if a methodology change is material. This determination is made based on the analysis of the currently estimated or potential future impact of the methodology change on the index composition, measured by the changes in the selection and/or weights of the index constituents. Fundamental changes in the index construction principles would be generally considered as material.
the market participants at the same time. MSCI takes into account prior feedback that may have been received on such topics, as part of its ongoing engagement with market participants. MSCI may also solicit views from its clients or other specific stakeholders on the consultation topic prior to making the changes.
7  **Index Terminations**

7.1 While terminations of MSCI indexes, regardless of index family, are rare, MSCI has clear written policies to address them. There may be certain circumstances where the methodology cannot be adapted in which case terminating the index may be required. These circumstances are generally not within MSCI’s control and may include significant changes to the structure of underlying market, drastic changes to the market infrastructure, lack of access to necessary data, geo-political events, and regulatory changes. Additionally, factors such as methodology convergence or low usage may result in MSCI’s proposal to terminate an index.

7.2 In all of these cases if an index termination is proposed or required, MSCI would proceed as follows:

- The FIIC would review the appropriateness and impact of a potential termination.
- MSCI may perform a consultation including a discussion of possible alternatives, if any.
- MSCI would announce the termination of the index in advance.
- If practicable, MSCI would continue to calculate the index for an announced period of time to give users the opportunity to transition to another index or otherwise prepare for the termination of the MSCI index.
- In the event that an appropriate alternative MSCI index is established, the details of the methodology governing this index as well as the timing of the transition would be publicly announced in advance of the implementation.

7.3 Indexes may also be discontinued if fewer than the required minimum number of securities are eligible for inclusion when applying a given methodology to a market. In these cases, the index can no longer be calculated in compliance with the applicable methodology and it will simply stop. MSCI may resume calculation of such indexes if, over time, enough securities become eligible.

7.4 The termination of a custom index is handled in consultation with the relevant client.
8 Index Usage

8.1 MSCI indexes, regardless of index family, may be used for a variety of purposes, including for research or use as the basis for index-linked investment products. They may be used by a variety of market participants including but not limited to asset owners, portfolio managers, broker-dealers, and researchers. Not all uses are appropriate for all users. Market participants should use their judgment when selecting an index for a particular purpose.

8.2 MSCI indexes, and the effectiveness of index methodologies can be affected by a number of factors, most of which are beyond MSCI’s control. These may include, but are not limited to, structural changes to the underlying market including decreases in the size and liquidity of the relevant market segment, infrastructure changes, geopolitical events, and regulatory changes. These circumstances may result in a material change the methodology as a result. In rare cases, these circumstances may result in the termination of an index.

8.3 If financial product issuers or investment managers choose to use an MSCI index, regardless of index family, as the basis of an index-linked financial product or an investment fund, they should consider this possibility, including the potential need to terminate or modify the terms of a financial product resulting from the termination of the calculation of the index.

8.4 MSCI assumes no responsibility for potential use of its indexes, regardless of index family, for particular purpose by clients, whether that use is for research, benchmarking, the basis for an index-linked financial product or investment fund, or some other use. The effective representation of a market or strategy is the primary aim for MSCI.
9 ESG Disclosures

9.1 ESG disclosures are provided as per the following regulations that were published in the EU Official Journal on December 3, 2020:


9.2 The ESG disclosures pertaining to Commission Delegated Regulation (EU) 2020/1816 for indexes in the MSCI fixed income benchmark family are published by MSCI at: https://www.msci.com/index-profile.

9.3 The ESG disclosures pertaining to Commission Delegated Regulation (EU) 2020/1817 of 17 July 2020 are provided together with the methodology documents governing a specific MSCI index in the MSCI fixed income benchmark family and can be accessed using the search function on www.msci.com/index-methodology/.
10 **Additional Information**

10.1 Detailed methodology and policy documents, a search function to find the methodology documents governing a specific MSCI index, regardless of index family, and vendor reference codes, if available, can be found on [www.msci.com](http://www.msci.com).

**DATE OF PUBLICATION:** DECEMBER 23, 2020

**DATE OF LAST UPDATE:** DECEMBER 23, 2020
Appendix I – Key Terms

<table>
<thead>
<tr>
<th>Key term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Developed Market (DM)</td>
<td>List of countries that have met quantitative and qualitative criteria defined within Market Classification Framework in MSCI Global Investable Market Indexes (GIMI) methodology.</td>
</tr>
<tr>
<td>Fixed Income Index Committee (FIIC)</td>
<td>The Fixed Income Index Committee (FIIC) is primarily responsible for the supervision of the design, development, approval and interpretation of index methodologies. Decisions taken by the FIIC are the sole responsibility of its members. The committee is staffed strictly by MSCI employees.</td>
</tr>
<tr>
<td>ESG Indexes</td>
<td>Indexes that are designed to accurately and objectively measure the performance by an investment opportunity set that represents an investment strategy focused on environmental, social and governance (ESG) themes.</td>
</tr>
<tr>
<td>Factor Indexes</td>
<td>Indexes that are designed to accurately and objectively measure the performance by an investment opportunity set that represents the return of factors and additional systematic risk premia, which have historically demonstrated excess market returns over the long run.</td>
</tr>
<tr>
<td>Index Policy Committee (IPC)</td>
<td>The Index Policy Committee (IPC) is responsible for final decisions with respect to market classifications and may be consulted on selected index terminations and is an escalation point for the FIIC. Relevant topics deemed to have material importance, as determined by the FIIC, are discussed and decided by the IPC.</td>
</tr>
</tbody>
</table>
MSCI FIXED INCOME BENCHMARK FAMILY – BENCHMARK STATEMENT | DECEMBER 2020

Contact us

clientservice@msci.com

AMERICAS

<table>
<thead>
<tr>
<th>Region</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Americas</td>
<td>1 888 588 4567 *</td>
</tr>
<tr>
<td>Atlanta</td>
<td>+1 404 551 3212</td>
</tr>
<tr>
<td>Boston</td>
<td>+1 617 532 0920</td>
</tr>
<tr>
<td>Chicago</td>
<td>+1 312 675 0545</td>
</tr>
<tr>
<td>Monterrey</td>
<td>+52 81 1253 4020</td>
</tr>
<tr>
<td>New York</td>
<td>+1 212 804 3901</td>
</tr>
<tr>
<td>San Francisco</td>
<td>+1 415 836 8800</td>
</tr>
<tr>
<td>São Paulo</td>
<td>+55 11 3706 1360</td>
</tr>
<tr>
<td>Toronto</td>
<td>+1 416 628 1007</td>
</tr>
</tbody>
</table>

EUROPE, MIDDLE EAST & AFRICA

<table>
<thead>
<tr>
<th>Region</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cape Town</td>
<td>+27 21 673 0100</td>
</tr>
<tr>
<td>Frankfurt</td>
<td>+49 69 133 859 00</td>
</tr>
<tr>
<td>Geneva</td>
<td>+41 22 817 9777</td>
</tr>
<tr>
<td>London</td>
<td>+44 20 7618 2222</td>
</tr>
<tr>
<td>Milan</td>
<td>+39 02 5849 0415</td>
</tr>
<tr>
<td>Paris</td>
<td>0800 91 59 17 *</td>
</tr>
</tbody>
</table>

ASIA PACIFIC

<table>
<thead>
<tr>
<th>Region</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>China North</td>
<td>10800 852 1032 *</td>
</tr>
<tr>
<td>China South</td>
<td>10800 152 1032 *</td>
</tr>
<tr>
<td>Hong Kong</td>
<td>+852 2844 9333</td>
</tr>
<tr>
<td>Mumbai</td>
<td>+91 22 6784 9160</td>
</tr>
<tr>
<td>Seoul</td>
<td>00798 8521 3392 *</td>
</tr>
<tr>
<td>Singapore</td>
<td>800 852 3749 *</td>
</tr>
<tr>
<td>Sydney</td>
<td>+61 2 9033 9333</td>
</tr>
<tr>
<td>Taipei</td>
<td>008 0112 7513 *</td>
</tr>
<tr>
<td>Thailand</td>
<td>0018 0015 6207 7181 *</td>
</tr>
<tr>
<td>Tokyo</td>
<td>+81 3 5290 1555</td>
</tr>
</tbody>
</table>

* = toll free

ABOUT MSCI

MSCI is a leading provider of critical decision support tools and services for the global investment community. With over 50 years of expertise in research, data and technology, we power better investment decisions by enabling clients to understand and analyze key drivers of risk and return and confidently build more effective portfolios. We create industry-leading research-enhanced solutions that clients use to gain insight into and improve transparency across the investment process.

To learn more, please visit www.msci.com.

The process for submitting a formal index complaint can be found on the index regulation page of MSCI’s website at: https://www.msci.com/index-regulation.
Notice and disclaimer

This document and all of the information contained in it, including without limitation all text, data, graphs, charts (collectively, the "Information") is the property of MSCI Inc. or its subsidiaries (collectively, "MSCI"), or MSCI's licensors, direct or indirect suppliers or any third party involved in making or compiling any Information (collectively, with MSCI, the "Information Providers") and is provided for informational purposes only. The Information may not be modified, reverse-engineered, reproduced or redistributed in whole or in part without prior written permission from MSCI. All right are reserved by MSCI and/or its Information Providers.

The Information may not be used to create derivative works or to verify or correct other data or information. For example (but without limitation), the Information may not be used to create indexes, databases, risk models, analytics, software, or in connection with the issuing, offering, sponsoring, managing or marketing of any securities, portfolios, financial products or other investment vehicles utilizing or based on, linked to, tracking or otherwise derived from the Information or any other MSCI data, information, products or services.

The user of the information assumes the entire risk of any use it may make or permit to be made of the Information. NONE OF THE INFORMATION PROVIDERS MAKES ANY EXPRESS OR IMPLIED WARRANTIES OR REPRESENTATIONS WITH RESPECT TO THE INFORMATION (OR THE RESULTS TO BE OBTAINED BY THE USE THEREOF), AND TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, EACH INFORMATION PROVIDER EXPRESSLY DISCLAIMS ALL IMPLIED WARRANTIES (INCLUDING, WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF ORIGINALITY, ACCURACY, TIMELINESS, NON-INFRINGEMENT, COMPLETEENESS, MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE) WITH RESPECT TO ANY OF THE INFORMATION.

Without limiting any of the foregoing and to the maximum extent permitted by applicable law, in no event shall any Information Provider have any liability regarding any of the Information for any direct, indirect, special, punitive, consequential (including lost profits) or any other damages even if notified of the possibility of such damages. The foregoing shall not exclude or limit any liability that may not by applicable law be excluded or limited, including without limitation (as applicable), any liability for death or personal injury to the extent that such injury results from the negligence or willful default of itself, its servants, agents or sub-contractors.

Information containing any historical information, data or analysis should not be taken as an indication or guarantee of any future performance, analysis, forecast or prediction. Past performance does not guarantee future results.

The Information should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. All Information is impersonal and not tailored to the needs of any person, entity or group of persons.

None of the information constitutes an offer to sell (or a solicitation of an offer to buy), any security, financial product or other investment vehicle or any trading strategy. It is not possible to invest directly in an index. Exposure to an asset class or trading strategy or other category represented by an index is only available through third party investable instruments (if any) based on that index. MSCI does not issue, sponsor, endorse, market, offer, review or otherwise express any opinion regarding any fund, ETF, derivative or other security, investment, financial product or trading strategy that is based on, linked to or seeks to provide an investment return related to the performance of any MSCI index (collectively, "Index Linked Investments"). MSCI makes no assurance that any Index Linked Investments will accurately track index performance or provide positive investment returns. MSCI Inc. is not an investment adviser or fiduciary and MSCI makes no representation regarding the advisability of investing in any Index Linked Investments.

Index returns do not represent the results of actual trading of investment assets/Securities. MSCI maintains and calculates indexes, but does not manage actual assets. Index returns do not reflect payment of any sales charges or fees an investor may pay to purchase the securities underlying the index or Index Linked Investments. The imposition of these fees and charges would cause the performance of an Index Linked Investment to be different than the MSCI index performance.

The Information may contain back tested data. Back-tested performance is not actual performance, but is hypothetical. There are frequently material differences between back tested performance results and actual results subsequently achieved by any investment strategy.

Constituents of MSCI equity indexes are listed companies, which are included in or excluded from the indexes according to the application of the relevant index methodologies. Accordingly, constituents in MSCI equity indexes may include MSCI Inc., clients of MSCI or suppliers to MSCI. Inclusion of a security within an MSCI index is not a recommendation by MSCI to buy, sell, or hold such security, nor is it considered to be investment advice.

Data and information produced by various affiliates of MSCI Inc., including MSCI ESG Research LLC and Barra LLC, may be used in calculating certain MSCI indexes. More information can be found in the relevant index methodologies on www.msci.com.

MSCI receives compensation in connection with licensing its indexes to third parties. MSCI Inc.’s revenue includes fees based on assets in Index Linked Investments. Information can be found in MSCI Inc.’s company filings on the Investor Relations section of www.msci.com.

MSCI ESG Research LLC is a Registered Investment Adviser under the Investment Advisers Act of 1940 and a subsidiary of MSCI Inc. Except with respect to any applicable products or services from MSCI ESG Research, neither MSCI nor any of its products or services recommends, endorses, approves or otherwise expresses any opinion regarding any issuer, securities, financial products or instruments or trading strategies and MSCI’s products or services are not intended to constitute investment advice or a recommendation to make (or refrain from making) any kind of investment decision and may not be relied on as such. Issuers mentioned or included in any MSCI ESG Research materials may include MSCI Inc., clients of MSCI or suppliers to MSCI, and may also purchase research or other products or services from MSCI ESG Research. MSCI ESG Research materials, including materials utilized in any MSCI ESG Indexes or other products, have not been submitted to, nor received approval from, the United States Securities and Exchange Commission or any other regulatory body.

Any use of or access to products, services or information of MSCI requires a license from MSCI. MSCI, Barra, RiskMetrics, IPD and other MSCI brands and product names are the trademarks, service marks, or registered trademarks of MSCI or its subsidiaries in the United States and other jurisdictions. The Global Industry Classification Standard (GICS) was developed by and is the exclusive property of MSCI and Standard & Poor’s. “Global Industry Classification Standard (GICS)” is a service mark of MSCI and Standard & Poor’s.

MIFID2/MIFIR notice: MSCI ESG Research LLC does not distribute or act as an intermediary for financial instruments or structured deposits, nor does it deal on its own account, provide execution services for others or manage client accounts. No MSCI ESG Research product or service supports, promotes or is intended to support or promote any such activity. MSCI ESG Research is an independent provider of ESG data, reports and ratings based on published methodologies and available to clients on a subscription basis. We do not provide custom or one-off ratings or recommendations of securities or other financial instruments upon request.

For information about how MSCI collects and uses personal data, please refer to our Privacy Notice at https://www.msci.com/privacy-pledge.