

Global Human Rights Policy

December 2020

For all MSCI offices

I. COMMITMENT TO HUMAN RIGHTS

MSCI Inc. (together with its subsidiaries, the “Firm” or “MSCI”) is committed to respecting and upholding the fundamental human rights of all people. This Global Human Rights Policy (this “Policy”) summarizes certain of our key policies and practices that reflect fundamental standards for business conduct that aim to ensure human rights are respected in all our activities and relationships with employees, clients, vendors and other stakeholders.

Human rights have long been integrated into how we operate our business, treat our employees, develop ethics codes and policies, interact with clients and vendors, and aim to create a safe, inclusive and diverse workplace. The MSCI Code of Business Conduct and Ethics (the “Code of Ethics”) applies to all employees and directors of MSCI and sets forth the fundamental principles of ethical and legal conduct that serve as the core of MSCI’s internal policies and practices, including those that support and promote fundamental human rights principles. Employees participate in periodic training on the Code of Ethics and its related policies. On an annual basis, the Nominating and Corporate Governance Committee of the MSCI Board of Directors receives a report from the Firm’s Head of Compliance on the Firm’s implementation of the Code of Ethics and its related policies as well as a report from MSCI’s Chief Responsibility Officer on the activities and initiatives of the Firm’s Corporate Responsibility Committee. Further, the MSCI Supplier Code of Conduct sets forth the Firm’s expectations regarding supplier conduct in accordance with human rights principles.

II. DIVERSITY AND INCLUSION

MSCI is committed to a work environment that values diversity and inclusion, and where everyone is treated with dignity and respect. Our policies promote equal employment opportunities without discrimination or harassment on the basis of race, color, religion, creed, age, gender, gender identity or expression, sexual orientation, national origin, citizenship, disability, marital and civil partnership/union status, pregnancy, legally protected parental or maternity leave, veteran or military status, genetic information or any other characteristic protected by applicable law. MSCI expects that relationships among persons in the workplace will be business-like and free of bias, harassment and violence. Diversity and inclusion initiatives are supported through various types of training (including unconscious bias training), recruiting efforts and employee resource groups and related ally programs.

Misconduct, including discrimination, harassment, retaliation or other forms of improper behavior are not tolerated. Such behavior, even if not unlawful, may subject employees to disciplinary action by the Firm, up to and including termination of employment or service.

III. SAFE AND HEALTHY WORKPLACE

MSCI is committed to conducting its business in compliance with all applicable environmental and workplace health and safety laws and regulations. We strive to provide a safe and healthy work environment for employees and to avoid adverse impact and injury to the environment and communities in which we conduct our business.

MSCI is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

MSCI’s offices, premises and facilities must comply with relevant laws and health and safety standards, including the provision of safe and clean drinking water and sanitation. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

IV. LABOR

MSCI prohibits the use of all forms of involuntary or forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. All employment must be freely chosen. MSCI publishes an annual Modern Slavery Statement on its public website, which is reviewed and approved by MSCI's Board of Directors.

MSCI prohibits child labor and adheres to all applicable labor and employment laws. We work to ensure full compliance with applicable wage, work hours, compensation, overtime and benefits laws. Employees must not be required to work more than the maximum hours allowed per local law. Employees have the right to the reasonable limitation of working hours and periodic holidays with pay, all in accordance with local laws.

VI. MONITORING, REPORTING AND REMEDIATION

As part of our commitment to upholding and protecting fundamental human rights, we will, on an ongoing basis, report on our human rights impacts through our Corporate Responsibility website.

We strive to create workplaces in which open and honest communications among all employees are valued and respected. Employees may submit questions or report concerns or violations of this Policy to the Chief Human Resources Officer, any other senior leader within the HR organization, their local HR Generalist or their manager. MSCI prohibits retaliation for reports or complaints regarding the misconduct of others. MSCI expects all such reports or complaints to be made in good faith.

MSCI will take very seriously, investigate, address and respond to the concerns of its employees. Where we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for appropriate corrective action.

Respect for human rights is a fundamental value of MSCI and we are committed to engaging with employees and other relevant stakeholders to listen to and understand any concerns or perspectives regarding our human rights practices generally or this Policy specifically.

Adopted by the MSCI Board of Directors on December 10, 2020

About MSCI

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