Global Human Rights Policy

**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 Governance and Corporate Responsibility 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. On an annual basis, the Compensation, Talent and Culture Committee of the Board of Directors will review and assess the adequacy of this Policy. Further, the MSCI Supplier Code of Conduct sets forth the Firm’s expectations regarding supplier conduct in accordance with human rights principles.

II. DIVERSITY, EQUITY AND INCLUSION

MSCI is committed to a work environment that values diversity, equity 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 from bias, harassment and intimidation. Diversity, equity and inclusion are fundamental principles of how we manage our business and global workforce. Our diversity, equity and inclusion strategies focus on training and development (including unconscious bias training), retention and advancement, recruiting, fostering an inclusive workplace and culture of belonging, and external stakeholder and internal employee engagement (including support for 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 aims to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

MSCI is committed to maintaining offices, premises and facilities that 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 strives to create a positive workplace with direct, open lines of communication, making third-party representatives for its employees unnecessary. It also respects the right of all people to freely associate and to support (or oppose) collective bargaining through a labor union. MSCI does not discriminate against anyone because of their membership or non-membership in a union.

The nature of MSCI’s activities makes the risk of human rights violations low. Nonetheless, 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. Where no wage law has been enacted, we will use market and industry standards to offer fair living wages. 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, on an ongoing basis, we report on our human rights initiatives through our Corporate Responsibility website.

We strive to create workplaces in which open and honest communications among all employees are valued and respected and where employees feel empowered to speak up if they observe any behavior that is inconsistent with our Code of Ethics. 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 taking 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, and amended on October 28, 2021.

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.

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