

# Global Human Rights Policy

\*\*For all MSCI offices\*\*

## I. COMMITMENT TO HUMAN RIGHTS

MSCI Inc. (together with its subsidiaries, "MSCI") is committed to respecting and upholding the fundamental human rights of all people and to ensuring that MSCI is not complicit in any human rights violations. This Global Human Rights Policy (this "Policy") summarizes certain of our key policies and practices that aim to ensure human rights are respected in all our activities and relationships, including with employees, clients, suppliers and other stakeholders. Our policies and practices are informed by the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Human rights have long been integrated into how we operate our business, treat our employees, develop ethics codes and policies and how we interact with clients, suppliers and other third parties. The MSCI Code of Business Conduct and Ethics (the "Code of Ethics") applies to all employees, officers 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 MSCI's Head of Compliance on the implementation of the Code of Ethics and its related policies.

Further, MSCI aims to do business with suppliers who share our values with respect to human rights. The [MSCI Supplier Code of Conduct](#) sets forth MSCI's expectations regarding supplier conduct, including with respect to human rights; labor law compliance; workplace rights and safety; diversity, equity and inclusion; and other areas.

## 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 for all applicants and existing employees without discrimination or harassment on the basis of race, color, religion, creed, age, gender, gender identity or expression, sexual orientation, national origin, ethnic origin, social 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. Our diversity, equity and inclusion strategies focus on training and development equity, 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). The basis for our recruitment, hiring, placement, training and development, retention and advancement, and compensation is qualifications, performance, skills and experience.

Each employee is responsible for complying with MSCI's equal employment opportunity and non-discrimination and non-harassment policies at all times. Misconduct, including discrimination, harassment, retaliation or other forms of improper behavior, is not tolerated. Such behavior, even if not unlawful, may subject employees to disciplinary action, 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 the 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 applicable 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's policies prohibit 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 applicable law. Employees have the right to the reasonable limitation of working hours and periodic holidays with pay, all in accordance with applicable laws.

#### **V. PRIVACY**

Protecting the confidentiality and security of personal data is integral to the way we conduct business worldwide. As set forth in our data protection and privacy policies and notices, MSCI respects individuals' privacy rights under applicable law and only uses personal data as permitted for business purposes.

#### **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 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 potentially violates or is inconsistent with the law, a regulation, our Code of Ethics or other MSCI policies, or is otherwise improper. Employees may submit questions or report concerns or violations of this Policy via MSCI's anonymous whistleblower hotline or to the Chief Human Resources Officer, any other senior leader within MSCI's Human Resources organization, their local Human Resources partner or their manager. MSCI prohibits retaliation or any other form of harassment 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 concerns related to human rights issues. Where we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to taking appropriate corrective action.

On an annual basis, the Compensation, Talent and Culture Committee of the Board of Directors reviews and assesses the adequacy of this Policy. 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 November 1, 2023.*

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## **About MSCI**

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enhanced solutions that clients use to gain insight into and improve transparency across the investment process.

To learn more, please visit [www.msci.com](http://www.msci.com).

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