



# MSCI – Sustainability & Climate Complaints Handling Policy and Procedures

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## 1. Policy statement

This document states the MSCI Sustainability & Climate (“MSCI S&C”)<sup>1</sup> Complaints Handling Policy and Procedures (“hereinafter, “the Policy and Procedures”).

The Policy and Procedures are part of MSCI S&C's framework to safeguard the transparency, integrity, and reliability of S&C Ratings for Users and Rated Items. It addresses requirements set out under Article 19 of the EU Regulation on ESG rating activities.

To the extent there is any conflict between the Policy & Procedures and any other policies or procedures, in each case, the most restrictive policies and procedures apply.

Any questions about this Policy’s meaning or application should be addressed to Compliance.

## 2. Scope

If a User of S&C Ratings, a Rated Item, or Issuer of a Rated Item has a formal complaint they wish to make about MSCI S&C Ratings, then the policy and procedures apply, and the communication channel as described below must be followed. Formal S&C Ratings complaints could relate to, for example:

- the way in which the rating methodology has been applied in relation to an individual S&C Rating
- the sources of data used for an individual S&C Rating, factual errors and mistakes, or
- whether an individual S&C rating is representative of a Rated Item or the Issuer of a Rated Item.

MSCI S&C engages with Users, Rated Items, and Issuers of Rated Items in a variety of ways. For example, MSCI S&C issues public consultations, hosts client/industry events and has functions that support questions regarding MSCI S&C Ratings. Those interactions are not considered part of the formal S&C Ratings complaints process and are not part of the process outlined in this policy and procedure.

Requests for information or clarification are not considered complaints. MSCI S&C will deal with a request for information or clarification as per the process defined in its Procedures of Engagement with Rated Entities, available on [msci.com](https://www.msci.com).

## 3. Process

### 3.1 Submitting a complaint

Formal S&C Ratings complaints must be submitted to MSCI S&C by completing the web form available on [msci.com](https://www.msci.com) at: <https://www.msci.com/>. [[Complaints handling form for website\\_10292025.docx](#)].

To ensure the complaint is afforded the appropriate attention, complaints will only be accepted through the communication channel described above and will not be accepted through other communication channels (except as described below).

If for any reason, the web form referenced above does not work, the submissions can be made as follows:

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<sup>1</sup> MSCI Sustainability & Climate products and services are provided by MSCI Solutions LLC in the United States, MSCI Solutions (UK) Limited in the United Kingdom, MSCI Solutions (Deutschland) GmbH and certain other related entities.

- Formal S&C Ratings complaints on behalf of Users and Fund Managers can be submitted by sending an email to [clientservice@msci.com](mailto:clientservice@msci.com).
- Complaints on behalf of Rated Items or Issuers of Rated Items can be submitted by sending an email to [issuercomms@msci.com](mailto:issuercomms@msci.com).

Users, Rated Items and Issuers of Rated Items submitting a complaint are required to provide the following information, including but not limited to:

- Full name of the complainant,
- User, Rated Item or Issuer of Rated Item name as applicable
- A clearly identified and actionable allegation including indication of the specific S&C Rating and the date of its issue; and
- Specific evidence supporting the detailed allegation.

Without the minimum set of information, MSCI S&C will not be able to investigate or process the complaint as such.

### 3.2 Investigating a Formal S&C Complaint

MSCI S&C will investigate complaints in a timely and fair manner. The information provided by the complainant may be used throughout the investigation and reporting processes and, as such, may not be kept confidential (in particular, in connection with any related legal, regulatory or other types of proceedings).

MSCI S&C will notify in writing the outcome of the investigation of a Formal S&C Rating complaint to the complainant within a reasonable period of time, unless such communication is contrary to law or regulation or the objectives of public policy or applicable law.

## 4. Record Keeping

MSCI S&C shall keep records of all documents relevant to these policy and procedures for a period of six years in accordance with the Record Keeping Policies and Procedures.