



MSCI – Sustainability & Climate Data Quality Controls and Data Updates Policy

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1. Policy Statement

This document states the MSCI Sustainability & Climate ("MSCI S&C")¹, Data Quality Controls and Data Updates Policy for S&C Ratings and S&C Data Products ("the Policy").

This Policy is part of MSCI S&C's framework to safeguard the transparency, integrity, and reliability of S&C Ratings and S&C Data Products for Users and Rated Items. It addresses requirements set out in the EU Regulation on ESG Rating Activities as well as applicable ESG codes of conduct.

This Policy is supplemented by the MSCI S&C Data Quality Controls and Data Updates Procedures.

To the extent there is any conflict between this Policy 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

This Policy applies to Data used in issuing S&C Ratings and S&C Data Products.

3. Policy

It is the Policy of MSCI S&C to take adequate steps to ensure that for S&C Ratings and S&C Data Products:

- (a) Data used is of sufficient quality and from reliable sources.
- (b) adequate data quality controls are in place.
- (c) processes are in place to update Data and to revise Data, including steps to ensure the accuracy, the timeliness and consistency of the Data revision process.

4. Defined Terms

Capitalized terms in this document are defined in the Glossary of Compliance Defined Terms.

¹ 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 in the EU and certain other related entities.