



MSCI – Sustainability & Climate Handling of S&C Confidential Information Policy

Issued by:	Compliance
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Scope:	Global
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1. Policy Statement

This document states the MSCI Sustainability & Climate (“MSCI S&C”)¹ Handling of S&C Confidential Information Policy (hereinafter, “the Policy”).

This Policy is 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 in the EU Regulation on ESG rating activities, as well as applicable ESG codes of conduct.

This Policy is supplemented by Handling of S&C Confidential Information Procedures.

To the extent there is any conflict between the Policy and any other policies or procedures, the most restrictive policies and procedures apply.

Any questions concerning the interpretation or application of this Policy should be addressed to Compliance.

2. Scope

This Policy applies to all S&C Personnel.

3. Policy

It is the policy of MSCI S&C that all S&C Personnel:

- 3.1 do not share S&C Confidential Information that has been entrusted to MSCI S&C with anyone who is not directly involved in the provision of S&C Ratings.
- 3.2 do not use or share S&C Confidential Information for any other purpose than the provision of S&C Ratings, including for the trading of financial instruments.

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.