



MSCI – Sustainability & Climate

Information Technology Controls Policy

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1. Policy Statement

This document states the MSCI Sustainability & Climate ("MSCI S&C")¹ Information Technology Controls 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 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 Information Technology Controls 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

The Policy applies to information technology systems comprising hardware, software, data platforms, networks and applications that are used in the development, review, approval and validation of S&C Models/Methodologies as well as their application and the distribution of S&C Ratings and S&C Data Products to Users and Rated Items ("the Systems").

3. Policy

It is the Policy of MSCI S&C that:

- 3.1 MSCI S&C employs and utilizes Systems in the provision of S&C Ratings and S&C Data Products that are adequate and effective.
- 3.2 MSCI S&C monitors and evaluates the adequacy and effectiveness of the systems at least annually and takes appropriate measures to address any deficiencies.
- 3.3 MSCI S&C has adopted and implemented effective access control and safeguard arrangements for the systems including authorisation processes which allow only authorised individuals to have access to information and tools utilized in the provision of S&C Ratings and S&C Data Products on a need to know and least privilege basis.
- 3.4 MSCI S&C has processes to verify that activities are approved and executed by staff members acting within the scope of their authority.
- 3.5 MSCI S&C takes measures to detect and act upon inappropriate, non-authorized, erroneous or fraudulent activities in a timely manner.

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.