



MSCI – Sustainability & Climate Look-Back Review 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 Look Back Review Policy (“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 under Article 17(7) of the EU Regulation on ESG rating activities.

The Policy is supplemented by the MSCI S&C Look-Back Review 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 about the Policy’s meaning or application should be addressed to Compliance.

2. Scope

The Policy applies to S&C Rating Analysts who were directly involved in the provision of S&C Ratings.

3. Policy

It is the Policy of MSCI S&C that-

- 3.1 When an S&C Rating Analyst terminates his/her employment with MSCI S&C (“MSCI”), MSCI’s Human Resources will request the Rating Analyst to indicate his/her future employer and if he/she is joining a Rated Entity.
- 3.2 When MSCI becomes aware that a former S&C Rating Analyst has been employed by a Rated Entity within 12 months after termination of their contract, MSCI will review their work from the 12 months preceding their departure, to determine whether any conflict of interest may have occurred.

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 and certain other related entities.