



MSCI – Sustainability & Climate Record Keeping Policy

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Contents

- 1. Policy Statement 3**
- 2. Scope 3**
- 3. Policy 3**
- 4. Defined Terms 3**

1. Policy Statement

This document states the MSCI Sustainability & Climate (“MSCI S&C”)¹ Record Keeping Policy (“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.

The Policy is supplemented by the MSCI S&C Record Keeping 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 MSCI S&C’s records of S&C Rating and S&C Data Products activities. These are records produced by MSCI S&C to support the issuance, publication and distribution of S&C Ratings and S&C Data Products (the “S&C Records”).

3. Policy

It is the policy of MSCI S&C that:

- 3.1 S&C Records listed in the MSCI S&C Record Keeping Procedures are kept for at least six years, in such a form that it is possible to replicate and fully understand the determination of an S&C Rating or S&C Data Product,
- 3.2 S&C Records are organized for efficient retrieval, and
- 3.3 MSCI S&C employees, including S&C Analytical Personnel, know the specific items to be kept and the means of storage.

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.