

# MSCI HONG KONG MANDATORY PROVIDENT FUND INDEXES METHODOLOGY

May 2021



Contents	1 Introduction to the MSCI Hong Kong Mandatory Provident Fund Indexes				
	2 Index Construction				
	2.1 Security Selection	2			
	2.1.1 Defining the Eligible Universe	2			
	2.2 Addressing Concentration Limit	2			
	2.3 Addressing Limit on Securities not Listed on a Stock Exchan Approved by the MPFA	ge 4			
	2.4 Addressing the Minimum 30% Requirement of Hong Kong Do Currency Exposure	ollar !			
	2.4.1 MSCI MPF Domestic Indexes	į			
	2.4.2 MSCI MPF Hedged Indexes	į			
	2.4.3 MSCI MPF Unhedged Indexes	6			
	3 Index Maintenance	7			
	3.1 Quarterly Index Review	-			
	3.1.1 Announcement Policy	7			
	3.2 Rebalancing due to non-compliance	-			
	3.3 Additions and Deletions due to Corporate Events	7			
	3.4 Maintenance of the MPFA Investment Restrictions	8			
	3.5 Calculation of the MSCI Net Daily Total Return Indexes	8			
	Appendix I: Exchanges Approved by MPFA	ç			
	Appendix II: Withholding Tax	12			
	Methodology Book Tracked Changes	16			



# 1 Introduction to the MSCI Hong Kong Mandatory Provident Fund Indexes

The Hong Kong Mandatory Provident Fund Schemes Authority (MPFA) regulates the operations of mandatory provident fund (MPF) schemes in accordance with the provisions under the MPF legislation, as well as relevant codes and guidelines. These regulations impose on the MPF funds, among other restrictions, the universe of permissible investments, the level of investment concentration as well as the requirement of maintaining a certain level of Hong Kong Dollar (HKD) exposure.

Constructed based on the MSCI Global Investable Market Indexes (GIMI), the MSCI Hong Kong MPF¹ Indexes take into account these investment restrictions. The MSCI Hong Kong MPF Indexes are divided into three sub-index groups: the MSCI MPF Domestic Indexes, the MSCI MPF Hedged Indexes, and the MSCI MPF Unhedged Indexes, each differs in the mechanism in addressing the MPFA currency exposure requirement.

This document describes the methodology that MSCI uses to calculate the MSCI Hong Kong MPF Indexes.

MSCI.COM | Page 3 of 19

<sup>&</sup>lt;sup>1</sup> The MSCI Hong Kong Mandatory Provident Fund Indexes are independently created and maintained by MSCI without input from or involvement by MPFA. MPFA does not endorse the MSCI Hong Kong Mandatory Provident Fund Indexes



# 2 Index Construction

# 2.1 Security Selection

## 2.1.1 Defining the Eligible Universe

The eligible universe of the MSCI Hong Kong MPF Indexes includes all constituent securities of the underlying MSCI Global Investable Market Indexes ("Parent Indexes") generally listed on approved stock exchanges by the MPFA.

Please note that the MSCI MPF Domestic Hong Kong Index is based on the MSCI Hong Kong Index plus the Hong Kong-listing of HSBC<sup>2</sup> The MSCI MPF Hong Kong Index is a composite index made up of the MSCI MPF Domestic Hong Kong Index and the MSCI MPF China Index. For any MSCI Hong Kong MPF Index that has a United Kingdom component, the London-listing of HSBC will be removed from the eligible universe.

REITs are included only if they are listed on the approved stock exchanges in the countries approved by the MPFA.

The full list of permissible investments can be found in the Appendix I.

# 2.2 Addressing Concentration Limit

In order to comply with the single issuer concentration limit, MSCI applies a capping of 10% on every company in the MSCI Hong Kong MPF Indexes. This capping is applied at the issuer level. However, a buffer of 10% will be applied to reduce the need of constant rebalancing and excessive index turnover. Specifically, at the point of the index initial construction, the weight of any single issuer is capped at 9% of the index weight. The excess weight of the capped issuer is then proportionally redistributed to other uncapped securities in the index.

# 2.3 Addressing Limit for Specific Securities where Investment May Not Exceed 10%<sup>3</sup>

MSCI applies a capping of 10% on the following securities included in the MSCI Hong Kong MPF Indexes:

<sup>&</sup>lt;sup>2</sup> The Hong Kong listing of HSBC is exceptionally classified in Hong Kong given its significant size in the Hong Kong stock market. This treatment is different as compared to the country classification rule of the MSCI Global Investable Market Indexes (GIMI) Methodology. At each Index Review, MSCI monitors the investability of the Hong Kong listing of HSBC relative to the investability requirements for the Equity Universe of Hong Kong under the MSCI GIMI Methodology.

<sup>&</sup>lt;sup>3</sup> As per Section 8 (2) of Schedule 1 to the Mandatory Provident Fund Schemes Regulation



- Stocks of companies listed on a stock exchange that is not approved by the MPFA
- Certificates or receipts whose underlying shares are not listed on a stock exchange approved by the MPFA, or not listed
- REITs subject to 10% group cap as per Appendix I

The capping is applied, as a group, on all such securities in a given index. A 10% buffer will be applied to the capping in order to reduce potential index turnover. The excess weight of capped securities is then proportionally redistributed to other uncapped securities in the index.

# 2.4 Addressing the Minimum 30% Requirement of Hong Kong Dollar Currency Exposure

The MSCI Hong Kong MPF Indexes comprise of the following three sub-index groups<sup>4</sup>, characterized by different index designs to address the 30% Hong Kong Dollar currency exposure requirement:

#### 2.4.1 MSCI MPF Domestic Indexes

The MSCI MPF Domestic Indexes apply a floor to the weight of the HKD denominated component and do not involve any currency hedging. Specifically, in order to comply with the requirement of at least 30% Hong Kong Dollar (HKD) currency exposure while applying a buffer to avoid excessive index turnover, a floor of 30% is applied to the weight of the HKD denominated MSCI MPF Hong Kong Index component.

For example, for regional and global indexes including the HKD denominated MSCI MPF Hong Kong Index component and where its weight is less than 35%, the index weight of the HKD denominated MSCI MPF Hong Kong Index component is set to be 35% at initial construction. The weight of the remaining constituents is decreased in proportion to their weight prior to the application of the floor to the HKD denominated securities.

# 2.4.2 MSCI MPF Hedged Indexes

In order to comply with the requirement of at least 30% HKD currency exposure, exposure to currency movements relative to the HKD is partially hedged on a monthly basis based on the MSCI Hedged Indexes methodology. Specifically, the home currency is set to be HKD and the hedged weight for each foreign currency is set to

<sup>&</sup>lt;sup>4</sup> Please note that due to the original HKD exposure of the regional or global Parent Index, not all three subindexes are produced for some regional or global MSCI Hong Kong MPF Indexes.



be 35% of its respective weight in the index on a monthly basis. The MSCI Hedged Indexes methodology is available at:

http://www.msci.com/index-methodology

# 2.4.3 MSCI MPF Unhedged Indexes

The MSCI MPF Unhedged Indexes are constructed without any explicit mechanism to address the 30% Hong Kong Dollar currency exposure. These indexes are mainly used as benchmark building blocks in conjunction with other asset classes/segments within an MPF fund that are already exposed to Hong Kong Dollars or for investors who wish to have the flexibility to applying other specific mechanisms to address the 30% Hong Kong Dollar requirement.



# 3 Index Maintenance

# 3.1 Quarterly Index Review

The MSCI Hong Kong MPF Indexes are rebalanced on a quarterly basis, nine business days before the effective dates of the MSCI Quarterly Index Reviews. The changes resulting from the rebalancing are also announced nine business days before the effective dates of the MSCI Quarterly Index Reviews and implemented as of the close of the last business day of each February, May, August and November, to coincide with the Quarterly Index Reviews of their Parent Indexes.

# 3.1.1 Announcement Policy

The pro forma MSCI Hong Kong MPF Indexes are announced nine business days before the effective date of each Index Review.

# 3.2 Rebalancing due to non-compliance

MSCI Hong Kong MPF Indexes are reviewed for non-compliance on concentration limit, limit on securities described in section 2.3 as a group and on Hong Kong dollar currency exposure on a daily basis. The MSCI MPF Indexes will be rebalanced in the event of non-compliance. The concentration constraint is considered to be breached when the weight of an issuer increases above 10%. The foreign currency exposure constraint is considered to be breached when the weight of the HKD denominated securities decreases below 30%.

The rebalancing will take place as of the close of the day when the index breaches any constraint, based on closing prices, such that the MSCI Hong Kong MPF Indexes will always be within the constraints before the opening of the following trading day.

In case the pro forma MSCI Hong Kong MPF Indexes become non-compliant between the announcement date and the effective date, the previously announced results will be discarded and a newly rebalanced pro forma index will be announced.

# 3.3 Additions and Deletions due to Corporate Events

A security added to or deleted from the Parent Index following a corporate event will also be added to or deleted simultaneously from the MSCI Hong Kong MPF Indexes.

Details regarding the treatment of corporate events not covered below can be found in the MSCI Corporate Events Methodology Book, available at:

http://www.msci.com/index-methodology

In case of MSCI Hong Kong MPF Indexes where the concentration constraint and/or the local currency exposure constraint are triggered, additions are included with an



estimated weight based on a rebalancing at the time of addition. The constraint applied on other index constituents is however not changed.

# 3.4 Maintenance of the MPFA Investment Restrictions

To ensure the MSCI Hong Kong MPF Indexes accurately reflect the MPF regulatory requirements, MSCI reviews the MPF investment restrictions twice a year coinciding with the May and November Semi-Annual Index Review.

# 3.5 Calculation of the MSCI Net Daily Total Return Indexes

In the calculation of the MSCI Net Daily Total Return Domestic Indexes, MSCI uses the withholding tax rate applicable to Hong Kong investors, as outlined in Appendix II.



# **Appendix I: Exchanges Approved by MPFA**

Country	Stock Exchange
Australia	Australian Securities Exchange
Austria	Vienna Stock Exchange
Belgium	Euronext Brussels
Brazil	B3 S.A Brasil, Bolsa, Balcão
Canada	Toronto Stock Exchange
	Shanghai Stock Exchange
China <sup>5</sup>	Shenzhen Stock Exchange
Taiwan	Taiwan Stock Exchange
Denmark	Nasdaq Copenhagen
Finland	Nasdaq Helsinki
France	Euronext Paris
Germany	Frankfurt Stock Exchange
Greece	Athens Stock Exchange
India	BSE
	National Stock Exchange of India
Indonesia <sup>4</sup>	Indonesia Stock Exchange
Ireland	Euronext Dublin
Israel	Tel-Aviv Stock Exchange
Italy	Borsa Italiana
	Nagoya Stock Exchange
Japan	Tokyo Stock Exchange
Korea	Korea Exchange
Luxembourg	Luxembourg Stock Exchange

 $<sup>^{5}</sup>$  The approved stock exchanges in China, Indonesia and Poland will be eligible staring from May 2021 SAIR.



Country	Stock Exchange
Malaysia	Bursa Malaysia
Mexico	Mexican Stock Exchange
Netherlands	Euronext Amsterdam
New Zealand	NZX
Norway	Oslo Børs
Philippines	Philippine Stock Exchange
Poland <sup>4</sup>	Warsaw Stock Exchange
Portugal	Euronext Lisbon
Singapore	Singapore Exchange Securities Trading
South Africa	Johannesburg Stock Exchange
Spain	Madrid Stock Exchange
Sweden	Nasdaq Stockholm
Switzerland	SIX Swiss Exchange
Thailand	Stock Exchange of Thailand
United Kingdom	London Stock Exchange
	NYSE American
	New York Stock Exchange
	NYSE Arca
USA	Nasdaq PHLX
	NASDAQ Stock Market
	Cboe BZX Exchange

Source: MPFA website. Last updated in November 2020.

 $\frac{http://www.mpfa.org.hk/eng/legislation\_regulations/legulations\_ordinance/guidelines/current\_version/investme}{nt/files/Annex\_A\_to\_III\_4.pdf}$ 

In addition, REITs from the approved stock exchanges in the following countries are approved as permissible investments.



Countries not subject to 10% group cap	Countries subject to 10% group cap <sup>6</sup>
Australia	Canada
Hong Kong	France
United Kingdom	Japan
United States of America	Singapore
	Netherlands

 $<sup>^{6}</sup>$  REITs listed on approved stock exchanges in Canada, France, Japan, Singapore and Netherlands will be eligible staring from May 2021 SAIR.



# **Appendix II: Withholding Tax**

Count	ry Of oration	Withholding Tax Rates	
Code	Name	(%) <sup>(1)</sup>	
AE	United Arab Emirates	0	
AN	Netherlands Antilles	0	
AR	Argentina	7	
AT	Austria	10 <sup>(10)</sup>	
AU	Australia (2)	30	
ВА	Bosnia & Herzegovina	5	
BD	Bangladesh	20	
BE	Belgium	15 <sup>(10)</sup>	
BG	Bulgaria	5	
ВН	Bahrain	0	
ВМ	Bermuda	0	
BR	Brazil <sup>(3)</sup>	0	
BS	Bahamas	0	
BW	Botswana	7.5	
CA	Canada	15 <sup>(10)</sup>	
СН	Switzerland	10 <sup>(10)</sup>	
CL	Chile	35	
CN	China (4)	0 or 10	
СО	Colombia	10	

Count	ry Of oration	Withholding Tax Rates
Code	Name	(%) <sup>(1)</sup>
KR	Korea	15 <sup>(10)</sup>
KW	Kuwait	0
KY	Cayman Islands	0
KZ	Kazakhstan	15
LB	Lebanon	10
LI	Liechtenstein	O <sup>(10)</sup>
LK	Sri Lanka	0
LR	Liberia	15
LT	Lithuania	15
LU	Luxembourg	10 <sup>(10)</sup>
MA	Morocco	15
МН	Marshall Islands	0
MK	Macedonia	10
MU	Mauritius	0
MT	Malta	0
MX	Mexico (9)	0 <sup>(10)</sup>
MY	Malaysia <sup>(5)</sup>	0
NG	Nigeria	10
NL	Netherlands	10 <sup>(10)</sup>



Country Of Incorporation		Withholding Tax Rates	Count	ry Of ooration	Withholding Tax Rates
Code	Name	(%) <sup>(1)</sup>	Code	Name	(%) <sup>(1)</sup>
CW	Curacao	0	NO	Norway	25
CY	Cyprus	0	NZ	New Zealand	15
CZ	Czech Republic	5 <sup>(10)</sup>	ОМ	Oman	0
DE	Germany	26.375	PA	Panama	10
DK	Denmark	27	PE	Peru	5
EE	Estonia	0	PH	Philippines	25
EG	Egypt	10	PK	Pakistan	10 <sup>(10)</sup>
ES	Spain	10 <sup>(10)</sup>	PL	Poland	19
FI	Finland	10 <sup>(10)</sup>	PR	Puerto Rico	10
FO	Faroe Islands	35	PS	Palestine	0
FR	France	10 <sup>(10)</sup>	PT	Portugal	10 <sup>(10)</sup>
GB	United Kingdom <sup>(6)</sup>	0	QA	Qatar	0
GG	Guernsey	0	RO	Romania	5
GH	Ghana	8	RS	Serbia	25
GI	Gibraltar	0	RU	Russia	10 <sup>(10)</sup>
GR	Greece	5 <sup>(10)</sup>	SA	Saudi Arabia	5
HK	Hong Kong	0	SE	Sweden	30
HR	Croatia	12	SG	Singapore (7)	0
HU	Hungary	0	SI	Slovenia	15
ID	Indonesia	10 <sup>(10)</sup>	TH	Thailand	10
IE	Ireland	0 <sup>(10)</sup>	TN	Tunisia	10
IL	Israel	25	TR	Turkey	15
IM	Isle Of Man	0	TT	Trinidad And Tobago	10
IN	India	5 <sup>(10)</sup>	TW	Taiwan (8)	21
IT	Italy	10 <sup>(10)</sup>	UA	Ukraine	15
JE	Jersey	0	US	USA	30
JM	Jamaica	33.333	VG	British Virgin Islands	0



Country Of Incorporation		Withholding Tax Rates		Country Of Incorporation		Withholding Tax Rates
Code	Name	(%) <sup>(1)</sup>		Code	Name	(%) <sup>(1)</sup>
JO	Jordan	0		VN	Vietnam	0
JP	Japan	10 <sup>(10)</sup>		ZA	South Africa	10 <sup>(10)</sup>
KE	Kenya	10		ZW	Zimbabwe	10

Last updated in May 2017

#### Notes:

- Used in the calculation of the MSCI Net Daily Total Return (DTR) Indexes.
   Withholding tax rates used are the maximum rates of the company's country
   of incorporation applicable to institutional investors who do not benefit from
   double taxation treaties.
- For Australian dividends, franking percentage and conduit foreign income are taken into consideration on calculation of the MSCI Net DTR Indexes. The actual withholding tax rate for an Australian dividend ranges from 0% to 30%. For details, please refer to the section 2.3.7.2.1 of the MSCI Index Calculation Methodology.
- 3. Interest on capital is subject to a 15% withholding tax.
- 4. For the MSCI China Index, the withholding tax rates are exceptionally based on Chinese securities' share types, regardless of the company's country of incorporation. B-share and H-share are subject to a 10% withholding tax. P-Chip and Red Chip are subject to a 0% withholding tax, unless a specific withholding tax of 10% is announced by the companies.
- 5. Dividends on Real Estate Investment Trusts (REITS) are subject to a 10% withholding tax.
- 6. Cash dividends paid by companies incorporated in the United Kingdom includes a 10% tax credit. MSCI does not take into consideration the tax credit for both the gross and net dividend amounts. As there is no withholding tax in the United Kingdom, the gross and net amounts of the cash dividends to be reinvested in the MSCI Net Daily Total Return (DTR) indexes are equal.
- 7. Dividends on Real Estate Investment Trusts (REITS) are subject to a 10% withholding tax.
- 8. Dividends on Real Estate Investment Trusts (REITS) are subject to a 15% withholding tax.



- 9. Dividends on Real Estate Investment Trusts (REITS) are subject to a 30% withholding tax.
- 10. The rates take into account the double tax treaties between Hong Kong resident investors and the relevant countries. In the calculation of the Net Daily Total Return Indexes, these withholding tax rates are applied to securities listed in the countries specified. Source: Inland Revenue Department website: <a href="http://www.ird.gov.hk/eng/tax/dta\_rates.htm">http://www.ird.gov.hk/eng/tax/dta\_rates.htm</a>



# **Methodology Book Tracked Changes**

The following sections have been modified since May 2014:

Appendix I: Exchanges Approved by MPFA

Addition of Philippine Stock Exchange

The following sections have been modified since May 2015:

Section 3.4: Maintenance of the MPFA Investment Restrictions

Frequency of reviews changed from once a year to twice a year

The following sections have been modified since May 2016:

Appendix II: Withholding Tax

Withholding tax rates of Italy and South Africa

The following sections have been modified since May 2017:

Appendix II: Withholding Tax

Withholding tax rates of Korea and Portugal

The following sections have been modified since August 2017:

Section 1: Introduction

Updates

Section 3.3: Additions and Deletions due to Corporate Events

Added clarification

The following sections have been modified since May 2018:

Section 2.1.1: Defining the Eligible Universe

Updates

Section 2.3: Addressing Limit on Securities not listed on a Stock Exchange Approved by the MPFA

Added new section

Section 3.1.1 Announcement policy

Added new section

The following sections have been modified since November 2018:

Appendix I: Exchanges Approved by MPFA

Cboe BZX Exchange name update



#### The following sections have been modified since May 2020:

Appendix II: Withholding Tax

 Withholding tax rates of India, Finland, Liechtenstein, Luxembourg, Russia, Argentina, Colombia, Egypt, Greece, Kuwait, Sri Lanka, Morocco, Peru, Romania, Serbia, Tunisia, Taiwan

#### The following sections have been modified since November 2020:

Section 2.1.1: Defining the Eligible Universe

Updates

Section 2.3: Addressing Limit on Securities not listed on a Stock Exchange Approved by the MPFA

- Changed headline
- Added REITs in the section
- Added footnote 3

Appendix I: Exchanges Approved by MPFA

- Addition of Shanghai Stock Exchange, Shenzhen Stock Exchange, Indonesia Stock Exchange and Warsaw Stock Exchange
- B3 S.A. Brasil, Bolsa, Balcão and Euronext Dublin name update
- Update the country names where REITs listed have been approved as permissible investments

#### The following sections have been modified since May 2021:

Appendix II: Withholding Tax

Withholding tax rates of Philippines



# **Contact us**

### **AMERICAS**

clientservice@msci.com

Americas	1 888 588 4567 *
Atlanta	+ 1 404 551 3212
Boston	+ 1 617 532 0920
Chicago	+ 1 312 675 0545
Monterrey	+ 52 81 1253 4020
New York	+ 1 212 804 3901
San Francisco	+ 1 415 836 8800
São Paulo	+ 55 11 3706 1360
Toronto	+ 1 416 628 1007

## **EUROPE, MIDDLE EAST & AFRICA**

Cape Town	+ 27 21 673 0100
Frankfurt	+ 49 69 133 859 00
Geneva	+ 41 22 817 9777
London	+ 44 20 7618 2222
Milan	+ 39 02 5849 0415
Paris	0800 91 59 17 *

#### **ASIA PACIFIC**

China North	10800 852 1032 *
China South	10800 152 1032 *
Hong Kong	+ 852 2844 9333
Mumbai	+ 91 22 6784 9160
Seoul	00798 8521 3392 *
Singapore	800 852 3749 *
Sydney	+ 61 2 9033 9333
Taipei	008 0112 7513 *
Thailand	0018 0015 6207 7181
Tokyo	+ 81 3 5290 1555

<sup>\* =</sup> toll free

### **ABOUT MSCI**

MSCI is a leading provider of critical decision support tools and services for the global investment community. With over 45 years of expertise in research, data and technology, we power better investment decisions by enabling clients to understand and analyze key drivers of risk and return and confidently build more effective portfolios. We create industry-leading research-enhanced solutions that clients use to gain insight into and improve transparency across the investment process.

To learn more, please visit www.msci.com.

The process for submitting a formal index complaint can be found on the index regulation page of MSCl's website at: <a href="https://www.msci.com/index-regulation">https://www.msci.com/index-regulation</a>.



# Notice and disclaimer

This document and all of the information contained in it, including without limitation all text, data, graphs, charts (collectively, the "Information") is the property of MSCI Inc. or its subsidiaries (collectively, "MSCI"), or MSCI's licensors, direct or indirect suppliers or any third party involved in making or compiling any Information (collectively, with MSCI, the "Information Providers") and is provided for informational purposes only. The Information may not be modified, reverse-engineered, reproduced or redisseminated in whole or in part without prior written permission from MSCI

The Information may not be used to create derivative works or to verify or correct other data or information. For example (but without limitation), the Information may not be used to create indexes, databases, risk models, analytics, software, or in connection with the issuing, offering, sponsoring, managing or marketing of any securities, portfolios, financial products or other investment vehicles utilizing or based on, linked to, tracking or otherwise derived from the Information or any other MSCI data, information, products or services.

The user of the Information assumes the entire risk of any use it may make or permit to be made of the Information. NONE OF THE INFORMATION PROVIDERS MAKES ANY EXPRESS OR IMPLIED WARRANTIES OR REPRESENTATIONS WITH RESPECT TO THE INFORMATION (OR THE RESULTS TO BE OBTAINED BY THE USE THEREOF), AND TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, EACH INFORMATION PROVIDER EXPRESSLY DISCLAIMS ALL IMPLIED WARRANTIES (INCLUDING, WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF ORIGINALITY, ACCURACY, TIMELINESS, NON-INFRINGEMENT, COMPLETENESS, MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE) WITH RESPECT TO ANY OF THE INFORMATION.

Without limiting any of the foregoing and to the maximum extent permitted by applicable law, in no event shall any Information Provider have any liability regarding any of the Information for any direct, indirect, special, punitive, consequential (including lost profits) or any other damages even if notified of the possibility of such damages. The foregoing shall not exclude or limit any liability that may not by applicable law be excluded or limited, including without limitation (as applicable), any liability for death or personal injury to the extent that such injury results from the negligence or willful default of itself, its servants, agents or sub-contractors.

Information containing any historical information, data or analysis should not be taken as an indication or guarantee of any future performance, analysis, forecast or prediction. Past performance does not guarantee future results.

The Information should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. All Information is impersonal and not tailored to the needs of any person, entity or group of persons.

None of the Information constitutes an offer to sell (or a solicitation of an offer to buy), any security, financial product or other investment vehicle or any trading strategy.

It is not possible to invest directly in an index. Exposure to an asset class or trading strategy or other category represented by an index is only available through third party investable instruments (if any) based on that index. MSCI does not issue, sponsor, endorse, market, offer, review or otherwise express any opinion regarding any fund, ETF, derivative or other security, investment, financial product or trading strategy that is based on, linked to or seeks to provide an investment return related to the performance of any MSCI index (collectively, "Index Linked Investments"). MSCI makes no assurance that any Index Linked Investments will accurately track index performance or provide positive investment returns. MSCI Inc. is not an investment adviser or fiduciary and MSCI makes no representation regarding the advisability of investing in any Index Linked Investments.

Index returns do not represent the results of actual trading of investible assets/securities. MSCI maintains and calculates indexes, but does not manage actual assets. Index returns do not reflect payment of any sales charges or fees an investor may pay to purchase the securities underlying the index or Index Linked Investments. The imposition of these fees and charges would cause the performance of an Index Linked Investment to be different than the MSCI index performance.

The Information may contain back tested data. Back-tested performance is not actual performance, but is hypothetical. There are frequently material differences between back tested performance results and actual results subsequently achieved by any investment strategy.

Constituents of MSCI equity indexes are listed companies, which are included in or excluded from the indexes according to the application of the relevant index methodologies. Accordingly, constituents in MSCI equity indexes may include MSCI Inc., clients of MSCI or suppliers to MSCI. Inclusion of a security within an MSCI index is not a recommendation by MSCI to buy, sell, or hold such security, nor is it considered to be investment advice.

Data and information produced by various affiliates of MSCI Inc., including MSCI ESG Research LLC and Barra LLC, may be used in calculating certain MSCI indexes. More information can be found in the relevant index methodologies on www.msci.com.

MSCI receives compensation in connection with licensing its indexes to third parties. MSCI Inc.'s revenue includes fees based on assets in Index Linked Investments. Information can be found in MSCI Inc.'s company filings on the Investor Relations section of www.msci.com.

MSCI ESG Research LLC is a Registered Investment Adviser under the Investment Advisers Act of 1940 and a subsidiary of MSCI Inc. Except with respect to any applicable products or services from MSCI ESG Research, neither MSCI nor any of its products or services recommends, endorses, approves or otherwise expresses any opinion regarding any issuer, securities, financial products or instruments or trading strategies and MSCI's products or services are not intended to constitute investment advice or a recommendation to make (or refrain from making) any kind of investment decision and may not be relied on as such. Issuers mentioned or included in any MSCI ESG Research materials may include MSCI Inc., clients of MSCI or suppliers to MSCI, and may also purchase research or other products or services from MSCI ESG Research. MSCI ESG Research materials, including materials utilized in any MSCI ESG Indexes or other products, have not been submitted to, nor received approval from, the United States Securities and Exchange Commission or any other regulatory body.

Any use of or access to products, services or information of MSCI requires a license from MSCI. MSCI, Barra, RiskMetrics, IPD and other MSCI brands and product names are the trademarks, service marks, or registered trademarks of MSCI or its subsidiaries in the United States and other jurisdictions. The Global Industry Classification Standard (GICS) was developed by and is the exclusive property of MSCI and Standard & Poor's. "Global Industry Classification Standard (GICS)" is a service mark of MSCI and Standard & Poor's.

MIFID2/MIFIR notice: MSCI ESG Research LLC does not distribute or act as an intermediary for financial instruments or structured deposits, nor does it deal on its own account, provide execution services for others or manage client accounts. No MSCI ESG Research product or service supports, promotes or is intended to support or promote any such activity. MSCI ESG Research is an independent provider of ESG data, reports and ratings based on published methodologies and available to clients on a subscription basis. We do not provide custom or one-off ratings or recommendations of securities or other financial instruments upon request.

Privacy notice: For information about how MSCI ESG Research LLC collects and uses personal data concerning officers and directors, please refer to our Privacy Notice at https://www.msci.com/privacy-pledge.