

Q&A: RECLASSIFICATION OF MSCI RUSSIA INDEXES TO STANDALONE MARKETS STATUS

March 2022





Contents	Introduction	4
	Reclassification of the MSCI Russia Indexes from Emerging Markets to Standalone Markets status	5
	1. What did MSCI announce on March 2, 2022?	5
	2. Why did MSCI decide to reclassify the MSCI Russia Indexes from Emerging Markets to Standalone Markets status?	5
3. When will the reclassification of the MSCI Russia Inde Standalone Markets status be implemented?		5
	4. Which indexes will be impacted by the reclassification?	5
	5. Which prices will MSCI use for the reclassification?	6
	6. Why did MSCI use prices of 0.00001 for the reclassification?	6
	Will there be any changes to the calculation of MSCI indexes un the reclassification on March 9, 2022?	
	8. Which prices will MSCI use in its indexes prior to the reclassification if Moscow Exchange is open?	7
	9. Will MSCI continue to calculate MSCI Russia Indexes following reclassification?	
	10. Will there be any other MSCI Indexes that continue to include Russian securities following the reclassification?	7
	11. Which prices will be used in the MSCI Indexes that continue to include Russian securities following the reclassification?	7
	12. When will MSCI stop applying prices of 0.00001 in the MSCI Indexes that continue to include Russian securities following the reclassification?	7
	13. How will corporate events be implemented in the MSCI Russia Indexes following the reclassification?	8
	14. How will security weights be calculated in the MSCI Russia Indexes following the reclassification?	8
	15. What will be the treatment in the MSCI Russia Indexes related t international sanctions targeting Russia following the reclassification	-



	16. When will MSCI consider a potential re-inclusion of Russia into		
	Emerging Markets? 9		
	17.	Has MSCI made available a list of impacted indexes?	9
	18.	What will be the impact on the MSCI ESG Indexes?	9
	19.	What will be the impact on the MSCI Hedged Indexes?	9
	20. Will the MSCI Russia Capped Indexes remain compliant with their capping constraints following the reclassification? 9		
	21. Value	What will be the impact on the MSCI Russia Islamic, MSCI Rus and the MSCI Russia Growth Indexes?	sia 10
	22.	Will there be any impact on product files?	10
	23.	When will the changes be reflected in real time index	
	calculations? 10		
	24. marke	What governance is employed regarding index methodology a t classification?	nd 10
Μ	SCI's	Public Announcements	11
	Annou	incement released on March 2, 2022	11
	Annou	incement released on February 28, 2022	13
	Announcement released on February 24, 2022		
	Announcement released on February 14, 2022 10		





Introduction

The purpose of this document is to address commonly asked questions regarding the reclassification of the MSCI Russia Indexes from Emerging Markets to Standalone Markets status. The content of this Q&A is based on the public information available at the time of publication on March 8, 2022 and may be revised as new information becomes available.

MSCI will continue to monitor ongoing market developments and may issue additional guidance or announce further changes relevant to specific indexes, if necessary.



Reclassification of the MSCI Russia Indexes from Emerging Markets to Standalone Markets status

1. What did MSCI announce on March 2, 2022?

MSCI announced on March 2, 2022 that the MSCI Russia Indexes will be reclassified from Emerging Markets to Standalone Markets status.

2. Why did MSCI decide to reclassify the MSCI Russia Indexes from Emerging Markets to Standalone Markets status?

On February 28, 2022, MSCI launched a consultation with international institutional investors on the accessibility and investability of the Russian equity market. During the consultation, MSCI received feedback from a large number of global market participants, including asset owners, asset managers, broker dealers, and exchanges with an overwhelming majority confirming that the Russian equity market was uninvestable and that Russian securities should be removed from the MSCI Emerging Markets Indexes.

Consultation participants highlighted several recent developments that led to a material deterioration in the accessibility of the Russian equity market to international institutional investors, including sanctions on individual companies, restrictions on the sale of securities on the Moscow Exchange, exclusion of Russian banks from SWIFT, closure of the Moscow Exchange, and deterioration in the convertibility of the Russian Ruble into foreign currencies. As a result, the MSCI Russia Indexes no longer met the Market Accessibility requirements for Emerging Markets classification as per the MSCI Market Classification Framework.

3. When will the reclassification of the MSCI Russia Indexes to Standalone Markets status be implemented?

The MSCI Russia Indexes will be reclassified from Emerging Markets to Standalone Markets status in one step as of the close of March 9, 2022.

4. Which indexes will be impacted by the reclassification?

The reclassification decision will be implemented across all MSCI Indexes, including standard, custom and derived indexes where the MSCI Russia Indexes are a component.

Specifically, Russian securities (i.e. securities classified in Russia) will be removed from all global and regional indexes within the MSCI Global Investable Market Indexes, including:



- MSCI ACWI Indexes
- MSCI ACWI + Frontier Markets Indexes
- MSCI Emerging Markets Indexes
- MSCI Emerging + Frontier Markets Indexes
- MSCI BRIC Indexes

5. Which prices will MSCI use for the reclassification?

The reclassification will be implemented using a lowest system price of 0.00001 of the security's price currency for all Russian securities, including local securities listed on the Moscow Exchange and ADR/GDR listings trading in London and New York.

- Russian securities quoting in RUB will be deleted from the relevant indexes at a price of RUB 0.00001
- Russian securities quoting in USD will be deleted from the relevant indexes at a price of USD 0.00001

6. Why did MSCI use prices of 0.00001 for the reclassification?

MSCI will use lowest system prices of 0.00001 to reflect the current uninvestability of the Russian equity market to international institutional investors, as confirmed by an overwhelming majority of market participants during the consultation launched on February 28, 2022.

7. Will there be any changes to the calculation of MSCI indexes until the reclassification on March 9, 2022?

No, there will be no changes to the calculation of MSCI Indexes until the reclassification takes place as of the close of March 9, 2022. Specifically, for the closing index levels calculated up to and including March 8, 2022, MSCI will use:

- The market price for the Russian securities including securities represented in the MSCI Indexes by their ADR/GDR listing – if these securities have traded during the day
- The last traded price for the Russian securities including securities represented in the MSCI Indexes by their ADR/GDR listing, if these securities have not traded or have been suspended during the day

This will apply irrespective of the level of accessibility of the local or ADR/GDR market to international institutional investors.



8. Which prices will MSCI use in its indexes prior to the reclassification if Moscow Exchange is open?

If Moscow Exchange is open and security market prices are available on any day prior to March 9, 2022, MSCI will use the market prices for the relevant securities for the calculation of the MSCI indexes on such days.

If Moscow Exchange is open on March 9, 2022, MSCI will still use a price of 0.00001 of the security's price currency as of the close of March 9, 2022.

9. Will MSCI continue to calculate MSCI Russia Indexes following the reclassification?

Yes. Following the reclassification, the MSCI Russia Indexes will be calculated and maintained as standalone indexes.

10. Will there be any other MSCI Indexes that continue to include Russian securities following the reclassification?

Yes. Certain custom indexes will continue to be calculated and maintained following the reclassification, such as custom indexes focused on Russia but using Russian ADR/GDR listings instead of local listings.

11. Which prices will be used in the MSCI Indexes that continue to include Russian securities following the reclassification?

Starting from the close of March 9, 2022 and until further notice, MSCI will use a price of 0.00001 of the security's price currency for the calculation of the MSCI Russia Indexes and any custom indexes that continue to include Russian securities. This will apply to any securities classified by MSCI in Russia, including locally listed securities and ADR/GDR listings.

12. When will MSCI stop applying prices of 0.00001 in the MSCI Indexes that continue to include Russian securities following the reclassification?

MSCI will closely monitor the investability and accessibility of the Russian equity market to international institutional investors after the reclassification. Prior to making any changes in the price treatment and potentially start using market prices for the index calculation, MSCI will consult with global market participants to assess if the level of investability and accessibility of the Russian equity market has



sufficiently improved. Any changes in treatment would be announced with appropriate advance notice.

13. How will corporate events be implemented in the MSCI Russia Indexes following the reclassification?

The index freeze as announced on February 24, 2022 will continue to apply in the MSCI Russia Indexes following the reclassification and until further notice.

Specifically for the MSCI Russia Indexes, MSCI will defer the implementation of corporate events not requiring a Price Adjustment Factor (PAF), such as placements, block sales, recapitalizations, and sizable IPOs, and will exceptionally freeze potential migrations due to corporate events until further notice. By contrast, MSCI will continue implementing corporate events requiring PAFs, such as stock splits, consolidations, rights issues, as well as deletions resulting from delisting, bankruptcies, mergers and acquisitions as well as prolonged suspensions at the time of the event. Starting from the close of March 9, 2022, prices of 0.00001 of the security's price currency will be applied irrespective of the implementation of any corporate events. Also, no PAFs will be applied and dividends will not be reinvested in the MSCI Russia Indexes.

14. How will security weights be calculated in the MSCI Russia Indexes following the reclassification?

Following the reclassification of the MSCI Russia Indexes, security weights in the MSCI Russia Indexes will continue to be calculated as per the MSCI Index Calculation Methodology¹, using a value of 0.00001 for the security price in local currency.

15. What will be the treatment in the MSCI Russia Indexes related to international sanctions targeting Russia following the reclassification?

The special treatment currently applied to *Sberbank*, *VTB Bank*, *Rosneft* and *Transneft* in the MSCI Russia Indexes related to international sanctions targeting Russia in the context of the 2014 events will continue to apply in the MSCI Russia Indexes following the reclassification.²

Also, MSCI may extend such treatment to securities of additional companies and/or implement a full deletion of securities of specific companies from the MSCI Russia

© 2022 MSCI Inc. All rights reserved. Please refer to the disclaimer at the end of this document. MSCI.COM | Page 8 of 18

¹ Available at: https://www.msci.com/index-methodology

² Please refer to the below document for more details on this special treatment. <u>https://www.msci.com/eqb/methodology/meth_docs/QAMSCI_RussiaUkraine_Feb2022.pdf</u>



Indexes due to further international sanctions targeting Russia being imposed in the context of Russia's invasion of Ukraine. MSCI would aim to provide at least two full business days advance notice prior to implementation of any such changes.

16. When will MSCI consider a potential re-inclusion of Russia into Emerging Markets?

In accordance with the MSCI Market Classification Framework, every June, MSCI will communicate its conclusions from the discussions with the investment community on the list of countries under review and announce the new list of countries, if any, under review for potential market reclassification in the upcoming cycle.

17. Has MSCI made available a list of impacted indexes?

Yes. The list of impacted MSCI indexes is included in the technical communication sent on March 3, 2022.

18. What will be the impact on the MSCI ESG Indexes?

The reclassification of the MSCI Russia Indexes will also be implemented in the MSCI ESG Indexes. Therefore, Russian securities will be deleted from the MSCI ESG Indexes as of the close of March 9, 2022.

MSCI will discontinue the MSCI Russia ESG Leaders Index following the reclassification of the MSCI Russia Indexes.

19. What will be the impact on the MSCI Hedged Indexes?

No adjustment to the Russian Ruble (RUB) notional amounts in MSCI Hedged Indexes will be done at the time of the reclassification as of the close of March 9, 2022. Starting from April 1, 2022, there will be no RUB notional amounts included in the MSCI Hedged Indexes and RUB spot and forward exchange rates will no longer be used in the calculation of the MSCI Hedged Indexes.

20. Will the MSCI Russia Capped Indexes remain compliant with their capping constraints following the reclassification?

MSCI intends to continue to maintain the MSCI Russia Capped Indexes, such as the MSCI Russia 10/40 Indexes and MSCI Russia 25/50 Indexes, in compliance with their capping constraints following the reclassification. MSCI Russia Capped Indexes that are not compliant with their capping constraints following the reclassification will be rebalanced accordingly as of the close of March 10, 2022 and this will be reflected in MSCI's product files starting from March 10, 2022.



21. What will be the impact on the MSCI Russia Islamic, MSCI Russia Value and the MSCI Russia Growth Indexes?

MSCI will discontinue the MSCI Russia Islamic, MSCI Russia Value and the MSCI Russia Growth Indexes following the reclassification of the MSCI Russia Indexes.

22. Will there be any impact on product files?

The delivery of MSCI product files and formats will remain unaffected. Details on content changes to products resulting from the reclassification of Russia to Standalone Markets were announced as part of the technical communication sent on March 3, 2022.

23. When will the changes be reflected in real time index calculations?

The exclusion of Russian securities from the MSCI Emerging Markets Indexes will be reflected at the open of March 10, 2022.

24. What governance is employed regarding index methodology and market classification?

Please refer to MSCI's publicly available documents regarding index governance, policies and procedures located on MSCI's Index Regulation web page at: <u>https://www.msci.com/index-regulation.</u>





MSCI's Public Announcements

Announcement released on March 2, 2022

MSCI TO RECLASSIFY THE MSCI RUSSIA INDEXES FROM EMERGING MARKETS TO STANDALONE MARKETS STATUS

MARCH 2022

MSCI Inc. (NYSE: MSCI), a leading provider of critical decision support tools and services for the global investment community, announced today that the MSCI Russia Indexes will be reclassified from Emerging Markets to Standalone Markets status. The reclassification decision will be implemented in one step across all MSCI Indexes, including standard, custom and derived indexes, at a price of 0.00001 of the security's price currency and as of the close of March 9, 2022.

On February 28, 2022, MSCI launched a consultation with international institutional investors on the accessibility and investability of the Russian equity market. During the consultation, MSCI received feedback from a large number of global market participants, including asset owners, asset managers, broker dealers, and exchanges with an overwhelming majority confirming that the Russian equity market is currently uninvestable and that Russian securities should be removed from the MSCI Emerging Markets Indexes.

Consultation participants highlighted several recent negative developments that led to a material deterioration in the accessibility of the Russian equity market to international institutional investors, to such an extent that it does not meet the Market Accessibility requirements for Emerging Markets classification as per the MSCI Market Classification Framework.

For the calculation of any MSCI Index which contains securities classified in Russia following the reclassification, MSCI will use a price of 0.00001 of the security's price currency until further notice. MSCI will closely monitor the situation and further communicate any change in such treatment as appropriate.

To assist investors in their planning for the implementation of the reclassification decision, MSCI already calculates more than 100 global and regional indexes that exclude Russia, for example, MSCI Emerging Markets ex Russia, MSCI ACWI ex Russia, MSCI EM EMEA ex Russia, MSCI EM Eastern Europe ex Russia, etc. The full list of MSCI ex Russia Indexes is available on request.

MSCI will continue to monitor market developments and may issue additional guidance or announce further changes relevant to specific indexes, if necessary.





Announcement released on February 28, 2022

MSCI SEEKS FEEDBACK ON THE CURRENT LEVEL OF ACCESSIBILITY AND INVESTABILITY OF THE RUSSIAN EQUITY MARKET FOR INTERNATIONAL INSTITUTIONAL INVESTORS

MSCI continues to closely monitor the accessibility and investability of the Russian equity market for international institutional investors. Recent negative developments include sanctions on individual companies, restrictions on the sale of securities on the Moscow exchange, exclusion of Russian banks from SWIFT, closure of the Moscow Exchange, and deterioration in the convertibility of the Russian Ruble into foreign currencies. In view of these developments, MSCI seeks feedback from market participants on the appropriate treatment of the Russian equity market within MSCI indexes up to and including the potential reclassification of the MSCI Russia Indexes from Emerging Markets to Standalone Markets status.

MSCI will issue further communication before the end of the week following the review of feedback from market participants.

As a reminder, a Q&A document on Russia/Ukraine developments is available at: <u>https://www.msci.com/eqb/methodology/meth_docs/QAMSCI_RussiaUkraine_Feb2</u> 022.pdf



Announcement released on February 24, 2022

SPECIAL TREATMENT OF RUSSIAN SECURITIES IN THE MSCI EQUITY INDEXES STARTING FROM THE FEBRUARY 2022 QUARTERLY INDEX REVIEW

On February 24, 2022, the United States announced new sanctions targeting Russia, including investment sanctions on a number of publicly listed Russian companies. Following the announcement of these new sanctions, as well as feedback received from market participants regarding the investability and replicability of the MSCI Russia Indexes, MSCI will apply a special treatment for Russian securities in the MSCI Equity Indexes starting from the February 2022 Quarterly Index Review (QIR).

More specifically, MSCI will not implement the previously announced changes for Russian securities as part of the February 2022 QIR for the MSCI Russia Indexes or impacted composite indexes. MSCI had announced changes in the Number of Shares for three securities in the MSCI Russia Investable Market Index (IMI) that will no longer take place as part of the February 2022 QIR. Such changes will be implemented at the earliest as part of the May 2022 Semi-Annual Index Review (SAIR), subject to the removal of the special treatment.

MSCI will also not implement any changes (additions, deletions, constraint factor changes) in non-market capitalization weighted indexes and custom indexes such as the MSCI Factor, ESG, Thematic and Capped Indexes for any security classified in Russia.

Note that if as a result of not implementing a constraint factor change on a security in the MSCI Russia Indexes in an MSCI 10/40 Index, MSCI 25/50 Index or MSCI 35/65 Index, the Index were not to be compliant with the concentration constraints described in these index methodologies, the constraint factor change will be implemented regardless of the special treatment mentioned above.

The reversal of the changes from the February 2022 QIR will be reflected in the MSCI Index Product files starting from February 25, 2022.

MSCI will also specifically defer for the MSCI Russia Indexes the implementation of corporate events not requiring a Price Adjustment Factor (PAF), such as placements, block sales, recapitalizations, and sizable IPOs, and will exceptionally freeze potential migrations due to corporate events until further notice. By contrast, MSCI will continue implementing corporate events requiring PAFs, such as stock splits, consolidations, rights issue, buybacks as well as deletions resulting from delisting, bankruptcies, mergers and acquisitions as well as prolonged suspensions at the time of the event.



All custom index methodologies will follow the same treatment as outlined for the above referenced indexes.

MSCI will continue to closely monitor the Russia/Ukraine developments and welcomes feedback from market participants on the impact of the new sanctions announced by the United States on their investment processes, including any practical implications on the use of MSCI indexes and whether any changes to MSCI indexes in addition to the special treatment described above may be necessary or helpful to maintain the investability of relevant MSCI indexes. MSCI will issue further communication in due course.



Announcement released on February 14, 2022

POTENTIAL NEW SANCTIONS TARGETING RUSSIA

MSCI is closely monitoring Russia/Ukraine developments, more specifically with regards to any potential new investment sanctions that could be put forth as a result.

As always, MSCI would analyze the impact of any new sanctions on international institutional investors related to the investability and replicability of the MSCI Russia Indexes. As a reminder, MSCI currently applies a special treatment to specific securities in the context of existing sanctions which target Russia. In case of new sanctions, MSCI would promptly launch a consultation with market participants regarding any change in such treatment or may implement changes without prior consultation if there are time constraints. MSCI will issue further communication in due course as the situation continues to evolve.

MSCI will also continue to closely monitor the market accessibility of the Russian equity market. As per the MSCI Market Classification Framework, any material deterioration of accessibility of an equity market to international institutional investors may lead to the reclassification of such market, subject to prior public consultation.



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

About MSCI

MSCI is a leading provider of critical decision support tools and services for the global investment community. With over 50 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 MSCI's website at: <u>https://www.msci.com/indexregulation</u>.

* = toll free



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. All rights in the Information are reserved by MSCI and/or its Information Providers.

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 S&P Global Market Intelligence. "Global Industry Classification Standard (GICS)" is a service mark of MSCI and S&P Global Market Intelligence.

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 collects and uses personal data, please refer to our Privacy Notice at https://www.msci.com/privacy-pledge.