

MSCI 25/50 Indexes Methodology

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1 Introduction to the MSCI 25/50 Indexes

Under the current US Internal Revenue Code, among other things, a fund needs to satisfy certain tests, such as those relating to asset diversification and sources of income, for qualification as a "regulated investment company" or "RIC". More specifically, one requirement of a RIC is that at the end of each quarter of a RIC's tax year no more than 25% of the value of the RIC's assets may be invested in a single issuer and the sum of the weights of all issuers representing more than 5% of the fund should not exceed 50% of the fund's total assets.

The MSCI 25/50 Indexes take into account these investment limits, aiming to offer a pertinent benchmarking alternative for RIC compliant funds.

This document describes the methodology that MSCI uses to calculate the MSCI 25/50 Indexes by applying the weight constraints set forth herein to the nonconstrained, free-float adjusted market capitalization weighted MSCI Equity Indexes (herein, "Parent Indexes").¹

¹ The Indexes are governed by a set of methodology and policy documents ("Methodology Set"), including the present index methodology document. The Methodology Set for the Indexes can be accessed from MSCI's webpage <https://www.msci.com/index-methodology> in the section 'Search Methodology by Index Name or Index Code'.

2 Index Objectives and Guiding Principles

In designing an appropriate methodology for constructing the MSCI 25/50 Indexes from underlying non-constrained indexes, the following principles have guided MSCI.

2.1 Reflecting the 25% and 50% Concentration Constrains

Reflecting the 25% and 50% concentration constraints is the primary consideration in terms of both index construction and index maintenance. Ensuring timely and ongoing reflection of the constraints requires an MSCI 25/50 Index to be rebalanced periodically. The MSCI 25/50 Indexes are rebalanced in February, May, August and November.

MSCI also offers other indexes reflecting additional or different constraints. See Appendix II for further details.

2.2 Minimizing Tracking Error to The Parent Index

Minimizing the tracking error between the MSCI 25/50 Index and the Parent Index, while keeping the index turnover to a reasonable level, is another important objective of the current methodology. This is achieved by rebalancing the MSCI 25/50 Index using an optimization process that aims to minimize the constituent weight differences between the MSCI 25/50 Index and the Parent Index.

3 Index Construction and Maintenance Methodology

3.1 Group Entities

The MSCI 25/50 Indexes use the concept of group entities to define the 25% and 50% concentration constraints at the issuer level.

Financial accounts of listed companies holding stakes of 20% or more in other listed companies are analyzed to determine whether these stakes are controlling in nature and, consequently, whether both companies should be considered as belonging to the same group entity. In certain cases, even in the absence of consolidated accounts, MSCI may consider two companies as belonging to the same group entity where there is reasonable evidence of control based on other information.

3.1.1 Maintenance

MSCI will perform an annual review of all group entities, which will coincide with the August Quarterly Index Review. Any change in a group entity resulting from a corporate event will be implemented at the time of the event. Updates triggered by the disclosure of new public information unrelated to corporate events or corrections to existing group entities will be implemented as of the close of the last business day of the month.

3.2 Construction and Rebalancing of The MSCI 25/50 Indexes

The MSCI 25/50 Index methodology follows a portfolio optimization framework. The Barra Optimizer is utilized to perform the optimization function which is aimed at minimizing index turnover, tracking error and extreme deviation from the Parent Index.²

3.2.1 Constraint Targets

The MSCI 25/50 Index has the following constraints:

- No group entity exceeds 25% of index weight
- All group entities with weight above 5% cannot exceed 50% of the index weight

3.2.2 Minimizing Tracking Error from Parent Index

The index aims at minimizing the tracking error from the pro forma Parent Index. The tracking error of the MSCI 25/50 Index versus the Parent Index is measured as the

² A brief description of Barra Optimizer can be found at www.msci.com/research-archive

sum of the squared weight differences between the constituent weights of the MSCI 25/50 Index and Parent Index.

3.2.3 Minimize Transaction Cost

A transaction cost is applied as a proxy for index turnover on rebalancing from the current MSCI 25/50 Index to the pro forma MSCI 25/50 Index.

3.2.4 Minimum Weight of Constituents

The minimum weight of any MSCI 25/50 Index constituent is equal to the weight of the smallest constituent in the pro forma Parent Index.

3.2.5 Maximum Weight of Constituents

In order to avoid excess weight allocation to the smaller securities relative to their market cap weight, the maximum weight of any MSCI 25/50 Index constituent is capped at four times its weight in the pro forma Parent Index. The constraint is relaxed in steps of one in case of infeasibilities.

For certain narrow parent indexes, the standard maximum weight constraint parameters might lead to an infeasible solution. In such cases, MSCI may apply relaxed constraints relative to the standard set of constraints.

3.3 Buffer Rules

A buffer of 10% of the value of each constraint is used in order to reduce the risk of non-compliance due to short term market movements between two quarterly rebalancing. As a result, at the point of constructing or rebalancing the MSCI 25/50 Indexes, the weight of any single group entity cannot exceed 22.5% of the index weight and all group entities with weight above 4.5% cannot exceed 45% of the index weight.

3.4 Maintenance Rules

3.4.1 Quarterly Index Reviews

The MSCI 25/50 Indexes are rebalanced quarterly and the changes resulting from the rebalancing are made as of the close of the last business day of each February, May, August and November, to coincide with the Index Reviews of their Parent Indexes

The pro forma MSCI 25/50 Indexes are in general rebalanced nine business days before the effective date. The changes resulting from the rebalancing are announced on the same day.

In case the pro forma MSCI 25/50 Index violates the 25/50 constraints between the announcement date and the effective date, the previously announced results will be discarded and a newly rebalanced pro forma index will be announced³.

There is no index rebalancing due to non-compliance between Quarterly Index Reviews.

At each rebalancing, a constraint factor is calculated for each constituent of the MSCI 25/50 Index. The constraint factor is defined as the weight in the MSCI 25/50 Index at the time of the rebalancing divided by the weight in the Parent Index. The constraint factor as well as the constituents of the index remains constant between index reviews except in case of corporate events as described below.

3.4.2 Ongoing Event Related Changes

The addition of a newly eligible security in the Parent Index -- for example an early inclusion of a large IPO, or a security migrating to the Parent Index from another size segment -- will result in the inclusion of that security in the MSCI 25/50 Index and consequently trigger the full rebalancing of the MSCI 25/50 Index.

In the event of a merger or an acquisition where an index constituent acquires another index constituent or merges with another index constituent, the remaining company is maintained in the index with a constraint factor calculated as the weighted average of the constraint factors before the corporate event.

If a spun off security of an index constituent is added to the Parent Index, it will be added to the MSCI 25/50 Index with the same constraint factor as the parent security.

The deletion of a constituent from the Parent Index following a corporate event triggers its deletion from the MSCI 25/50 Index without rebalancing of the MSCI 25/50 Index.

Please refer to the MSCI Corporate Events Methodology book available at: <https://www.msci.com/index-methodology> for more details.

³ This index methodology feature may be customized upon request. For example, the user may choose not to apply the constraint check closer to the effective date of the Index Review (e.g. T-2 and T-1). This is to avoid announcing a new pro forma index close to the effective date of an Index Review to provide sufficient time for implementation.

3.5 Group Entity Concentration Issues

A minimum of 15 group entities in the Parent Index is required at any point in time for an MSCI 25/50 Index to be rebalanced as described in Section 3.1. In the event the number of group entities drops below 15 but remains above 11 following a corporate event or a regular index review, MSCI will apply the following adjustments⁴:

- Number of group entities drops to 14: the buffer mentioned in sub-section 3.2 will be reduced from 10% to 9%. Thus, the weight of any single group entity cannot exceed 22.75% of the index weight and all group entities with weight above 4.55% cannot exceed 45.5% of the index weight.
- Number of group entities drops to 13: the buffer mentioned in sub-section 3.2 will be reduced from 10% to 4%. Thus, the weight of any single group entity cannot exceed 24% of the index weight and all group entities with weight above 4.8% cannot exceed 48% of the index weight.
- Number of group entities drops to 12: the buffer mentioned in sub-section 3.2 will be reduced from 10% to 0%. Thus, the weight of any single group entity cannot exceed 25% of the index weight and all group entities with weight above 5% cannot exceed 50% of the index weight.

In case of extremely concentrated Parent Indexes where it may not be feasible to construct the pro forma MSCI 25/50 Index using the Barra Open Optimizer, MSCI may temporarily use the capping algorithm described in the MSCI 10/40 Index methodology with the relevant 25/50 parameters to construct the pro forma MSCI 25/50 Index. For more details, please refer to the MSCI 10/40 Index methodology book available at: <https://www.msci.com/index-methodology>

The MSCI 25/50 Index will need to be discontinued if the number of group entities drops below 12 as mathematically no solution can satisfy the 25% and 50% constraints. MSCI will however temporarily maintain the MSCI 25/50 Index for a minimum of two months before discontinuation by adding the necessary number of securities to the index. The index discontinuation will coincide with one the subsequent regular index reviews. The securities to be added will be chosen in the following order of priority:

- Securities deleted from the MSCI 25/50 Index, provided they exhibit required liquidity and were not deleted due to financial difficulties, etc.

⁴ In general, where a capped index does not have enough constituents required for capping, any buffers used in the capping will be first reduced as required to make the capping feasible. If the capping is not feasible even after the reduction of buffers, MSCI may add securities as highlighted in section 3.5 and may potentially discontinue the index after a period, as per the Index Termination Policy in the MSCI Index Policies available at <https://www.msci.com/indexmethodology>.

- Eligible securities of relevant size not included in the Parent Index, e.g., largest small cap size-segment securities if the Parent Index is a MSCI Standard Index.

In the event that no securities are eligible for temporary addition to the MSCI 25/50 Index, MSCI will be providing an index, as close as possible to the 25/50 constraints, for a minimum of two months before discontinuation. The index discontinuation will coincide with one of the subsequent regular index reviews.

MSCI will announce any of these adjustments to all impacted clients ahead of implementation

Appendix I: Optimization Parameters

The following parameters are used in the optimization process:

- The Parent Index is used as the benchmark.
- The objective is to minimize tracking error to the Parent Index.
- A diagonal covariance matrix is used with the same risk for each constituent (1) and zero for all off-diagonals.
- The minimum weight of capped index constituents is set to the weight of the smallest constituent in the Parent Index. This avoids the situation where the optimized index holds a security with a very small weight.
- The maximum weight of index constituents is capped at 4 times their weight in the pro forma Parent Index. The constraint would be relaxed in steps of 1 in cases of infeasibilities.
- The risk aversion parameter is set to default value of 0.0075, which is widely used in mean-variance optimizations.
- One way transaction cost is set to 0.5%, which aims to achieve a balance between minimizing active risk and turnover.
- The weight of each China A Stock Connect listing will be capped at a maximum of three times its weight in the Parent Index

Appendix II: Special Capping Rules

Additional capping rules may be applied to address other investment constraints, such as:

- No group entity can exceed 10% of the weight and all group entities with weight above 5% cannot exceed 25% of the index weight.
- No group entity can exceed 5% of the index weight.

Changes to the Methodology Book

The following sections have been modified as of September 2017:

Section 1: Introduction to the MSCI 25/50 Indexes

- Updates to the description

Section 2: Construction and Rebalancing of the MSCI 25/50 Indexes

- Updated link for the description of Barra Optimizer

The following sections have been modified as of October 2017:

Appendix III: Methodology for the MSCI US IMI/Telecom SVC 25-50 Index

- Included details of the construction methodology for the MSCI US IMI/Telecom SVC 25-50 Index.

The following sections have been modified as of May 2018:

Appendix I: Optimization Parameters

- Included details on additional constraint to be applied on China A Stock Connect listing

The following sections have been modified as of February 2019:

Deleted Appendix III: Methodology for the MSCI US IMI/Telecom SVC 25-50 Index
Included details on maximum weight capping constraint in the below sections

- Section 3.2.5 : Maximum Weight of Constituents
- Appendix I: Optimization Parameters Section

3.4.1: Quarterly Index Reviews

- Updated rebalancing notification change from five days to nine days

The following sections have been modified as of August 2021:

Section 3.5: Group Entity Concentration Issues

- Added footnote handling infeasible capping of custom 25/50 indexes

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The following sections have been modified as of August 2023:

Section 1 Introduction to the MSCI 25/50 Indexes

- Added Footnote highlighting Indexes governance.

Methodology book was updated to reflect the transition of the MSCI Global Investable Market Indexes (GIMI) to Quarterly Comprehensive Index Reviews.

All references to “Semi-Annual Index Reviews” and “Quarterly Index Reviews” of the MSCI GIMI were replaced with “Index Reviews”.

Section 3.4.2 Ongoing Event Related Changes

- Methodology book was updated to add additional clarity on the addition of new securities within 25-50 indexes due to common corporate events.

The following sections have been modified as of October 2024:

Section 3.4.1 Quarterly Index Reviews

Added Footnote highlighting an index methodology feature that may be customized upon request to avoid announcing a new pro forma Index close to the effective date of an Index Review for MSCI Custom 25/50 Indexes

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