

# **MSCI COLCAP Index Methodology**

November 2023

## Contents

<b>1</b>	<b>Introduction .....</b>	<b>3</b>
<b>2</b>	<b>Index Construction Methodology .....</b>	<b>4</b>
2.1	Equity Universe .....	4
2.2	Eligibility and Investability Criteria .....	4
2.3	Security Selection .....	4
2.4	Security Weighting .....	5
<b>3</b>	<b>Index Maintenance Methodology .....</b>	<b>6</b>
3.1	Annual Index Review .....	6
3.1.1	Updating the Equity Universe .....	6
3.1.2	Updating the Eligible and Investable Equity Universe .....	6
3.1.3	Security Selection .....	6
3.1.4	Deleting Securities with Low Liquidity .....	7
3.1.5	Security Weighting .....	7
3.2	Quarterly Index Review .....	7
3.3	Cutoff Dates for the Rebalancing .....	7
3.4	Index Review Announcement Policy .....	8
3.5	Ongoing Event Related Changes .....	8
	<b>Appendix I: Eligibility and Investability Parameters .....</b>	<b>10</b>
	<b>Appendix II: Transition from the bvc COLCAP Index to the MSCI COLCAP Index .....</b>	<b>11</b>
	MSCI Provisional COLCAP Index .....	11
	Transition to the MSCI COLCAP Index .....	11
	<b>Appendix III: Changes to the Methodology Book .....</b>	<b>12</b>

## 1 Introduction

The MSCI COLCAP Index is designed to represent the performance of the local Colombian equity market. The index aims to include a minimum of 25 securities and 20 issuers selected based on free float-adjusted market capitalization, liquidity, and international investability criteria.<sup>1</sup>

---

<sup>1</sup> 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 Construction Methodology

### 2.1 Equity Universe

The applicable equity universe includes all locally listed securities on the Colombia Securities Exchange (Bolsa de Valores de Colombia – bvc). Foreign shares trading through bvc’s Colombian Global Market segment are not eligible for inclusion.

Eligibility of securities, including preferred shares and Real Estate Investment Trusts, are based on rules described in the MSCI Global Investable Market Indexes methodology.

Dual-listed shares are eligible for inclusion and will be assessed based on their listing on the bvc.

### 2.2 Eligibility and Investability Criteria

Minimum requirements based on the following parameters are applied to the applicable universe to determine the eligible equity universe of securities for inclusion in the index.

Within the eligible equity universe, higher values for each of the same criteria are used to define the investable equity universe.

In the index construction process, preference is given to securities that are included in the investable universe and eligible universe using the criteria in the Appendix to enhance the investability and replicability of the index.

- Full market capitalization – this requirement is applied at the company level
- Free float-adjusted market capitalization – this requirement is applied at the security level
- Free float (Foreign Inclusion Factor<sup>2</sup>) – this requirement is applied at the security level
- Liquidity (12-month Annual Traded Value Ratio<sup>3</sup> (ATVR), 3-month ATVR, and 3-month frequency of trading) – this requirement is applied at the security level

The applicable thresholds are detailed in the Appendix.

### 2.3 Security Selection

The index targets a minimum of 25 securities and 20 issuers. Multiple securities from the same issuer may be included and are assessed separately in the security selection steps.

<sup>2</sup> MSCI defines Foreign Inclusion Factor as the proportion of the shares outstanding that is available for purchase in the public equity markets by international investors. Details on MSCI’s free float estimation and review rules can be found in the MSCI GIMI Methodology, available at <https://www.msci.com/index/methodology/latest/GIMI>

<sup>3</sup> The ATVR measures the average traded value as a proportion of the free float-adjusted market capitalization over a specified period. Details on the computation of ATVRs can be found in the MSCI Global Investable Market Indexes (GIMI) Methodology, available at <https://www.msci.com/index/methodology/latest/GIMI>

All securities belonging to the MSCI Colombia Investable Market Index<sup>4</sup> (IMI) are included in the MSCI COLCAP Index.

If the number of securities is below 25 or the number of issuers is below 20, securities are added in the following order until both these targets are reached:

- securities that are part of the investable equity universe in the order of decreasing free float-adjusted market capitalization
- securities that are not part of the investable equity universe but part of the eligible equity universe in the order of decreasing liquidity (3-month ATVR)
- securities that are not part of the eligible universe in the order of decreasing liquidity (3-month ATVR)

## 2.4 Security Weighting

The selected index constituents are assigned weights in proportion to their free float-adjusted market capitalization.

---

<sup>4</sup> The MSCI Global Investable Market Indexes (GIMI), including the MSCI Colombia IMI, are maintained based on higher investability thresholds. Further details can be found in the MSCI GIMI Methodology, available at <https://www.msci.com/index/methodology/latest/GIMI>

Any constituent of the MSCI Colombia IMI that is listed in the Global Select market is not eligible for inclusion in the MSCI COLCAP Index

## 3 Index Maintenance Methodology

The MSCI COLCAP Index is reviewed on a quarterly basis to coincide with the regular Index Reviews of the MSCI Global Investable Market Indexes. The November Index Review involves a full review of the composition of the MSCI COLCAP Index, while the February, May and August Index Reviews generally reflect changes to the MSCI Colombia IMI.

### 3.1 Annual Index Review

The MSCI COLCAP Index is fully reviewed annually in November, and the changes are implemented coinciding with the Index Review of the MSCI Global Investable Market Indexes.

#### 3.1.1 Updating the Equity Universe

During the Annual Index Review, the equity universe is updated by identifying all eligible securities according to Section 2.1.

#### 3.1.2 Updating the Eligible and Investable Equity Universe

Each security in the equity universe that is not a constituent of the MSCI COLCAP Index is assessed for eligibility and investability using the same criteria described in Section 2.2.

Assessment of existing constituents of the MSCI COLCAP Index, on the other hand, is subject to buffers to enhance index stability.

The applicable thresholds are detailed in the Appendix.

#### 3.1.3 Security Selection

All securities meeting the following criteria are included in the pro forma MSCI COLCAP Index:

- Securities belonging to the pro forma MSCI Colombia IMI<sup>5</sup>
- Existing constituents of the MSCI COLCAP Index that continue to meet the investability criteria

If the number of securities is below 25 or the number of issuers is below 20, additional securities are included in the following order until both these targets are reached:

- Non-constituent securities that are part of the investable equity universe in the order of decreasing free float-adjusted market capitalization
- Existing constituents that are not part of the investable equity universe but part of the eligible equity universe in the order of decreasing liquidity (3-month ATVR)
- Non-constituent securities that are not part of the investable equity universe but part of the eligible equity universe in the order of decreasing liquidity (3-month ATVR)
- Existing constituents that are not part of the eligible equity universe in the order of decreasing liquidity (3-month ATVR)

<sup>5</sup> Excluding any security that is listed in the Global Market segment

- Non-constituent securities that are not part of the eligible equity universe in the order of decreasing liquidity (3-month ATVR)

### 3.1.4 Deleting Securities with Low Liquidity

Securities identified as deletions due to failing the liquidity requirements (but otherwise meet other requirements) are deleted in two phases to enhance index replicability.

To do so, an inclusion factor of 0.5 is applied to the weight of the security at the time of the November Annual Index Review and up to the February Quarterly Index Review (QIR). The security is deleted fully from the index coinciding with the February QIR.

All other deletions are implemented fully at the time of the November Annual Index Review.

### 3.1.5 Security Weighting

All securities are weighted in the pro forma index based on their free float-adjusted market capitalization; except securities that will be deleted in two phases due to low liquidity.

## 3.2 Quarterly Index Review

Additions to the MSCI Colombia IMI<sup>6</sup> as part of the May, February and August Index Reviews of the MSCI Global Investable Market Indexes are simultaneously reflected in the MSCI COLCAP Index.

Deletions from the MSCI Colombia IMI as part of the May, February and August Index Reviews are generally not reflected in the MSCI COLCAP Index and are reviewed for continued inclusion as part of the following November Index Review.

If the number of securities falls below 23 and/or the number of issuers falls below 18 at the Quarterly Index Review, additions are made to the index as described in Section 3.1.3 in order to restore the number to 23 securities and 18 issuers.

## 3.3 Cutoff Dates for the Rebalancing

The cutoff date for market capitalization data used in the rebalancing of the MSCI COLCAP Index is generally nine business days before the effective date of the index review.

Liquidity data is as of the month-end of January, April, July, and October, for the February, May, August, and November index reviews, respectively

The Equity Universe is updated as of the last business day of November, February, May, and August for the February, May, August, and November index reviews, respectively.

For the full universe, MSCI updates free float estimates annually as part of its Annual Float Review coinciding with the May Semi-Annual Index Review. In addition, significant changes in the Foreign Inclusion Factor or Number of Shares may be implemented for constituents of the MSCI Colombia IMI at the time of the quarterly index reviews. Further details can be found in the MSCI GIMI Methodology, available at <https://www.msci.com/index/methodology/latest/GIMI>

<sup>6</sup> Excluding any security that is listed in the Global Market segment

### 3.4 Index Review Announcement Policy

The pro forma results of the rebalancing of the MSCI COLCAP Index are generally announced nine business days before the effective date of each index review.

The index review is implemented as of the close of the last business day of the month and effective at the open of the first business day of the following month. For example, the results of the November Annual Review are implemented as of the close of the last business day of November and effective at the open of the first business day of December.

Effective dates for the MSCI Index Reviews are announced with sufficient advance notice, including changes thereof, if any.

### 3.5 Ongoing Event Related Changes

The following section briefly describes the treatment of common corporate events within the MSCI COLCAP Index. Corporate events treatment is based on the MSCI Corporate Events Methodology and is generally driven by the size segment classification of the security in the MSCI Global Investable Market Indexes.

No new securities will be added outside the regularly scheduled index reviews, other than those added to the MSCI Colombia IMI<sup>7</sup>.

Securities deleted from the MSCI Colombia IMI resulting from corporate events, will be simultaneously deleted from the MSCI COLCAP Index.

#### EVENT TYPE

#### EVENT DETAILS

##### New additions

A new security added to the MSCI Colombia IMI will be simultaneously added to the MSCI COLCAP Index at an estimated full market capitalization adjustment factor on the date of security inclusion.

##### Spin-Offs

Spun-off securities that are added to the MSCI Colombia IMI will be simultaneously added to the MSCI COLCAP Index at the time of event implementation. Reevaluation for continued inclusion will occur at the subsequent Index Review

##### Merger/Acquisition

For Mergers and Acquisitions, the acquirer's post event weight will account for the proportionate amount of shares involved in deal consideration, while cash proceeds will be invested across the Index.

If an existing MSCI COLCAP Index constituent is acquired by a non- constituent, the existing constituent will be deleted, and the acquiring non- constituent will be added to the MSCI COLCAP Index

<sup>7</sup> Excluding any security that is listed in the Global Market segment



if it is also added to the MSCI Colombia IMI. Reevaluation for continued inclusion will occur at the subsequent Index Review.

### Changes in Security Characteristics

A security will continue to be an index constituent if there are changes in characteristics (e.g. sector, MSCI GIMI size segment, etc.). Reevaluation for continued inclusion will occur at the subsequent Index Review

### Securities under Prolonged Suspension

Constituents that are under prolonged suspension are deleted from the MSCI COLCAP Index. If the suspended security is also a constituent of the MSCI GIMI, the security will be deleted from the MSCI COLCAP Index two business days following 50 business days of continuous suspension. Otherwise, the deletion of the suspended security will be implemented two business days following 100 days of continuous suspension

Further detail and illustration regarding specific treatment of corporate events relevant to this Index can be found in the MSCI Corporate Events Methodology book under the sections detailing the treatment of events in Capped Weighted and Non-Market Capitalization Weighted indexes.

The MSCI Corporate Events methodology book is available at:  
<https://www.msci.com/index/methodology/latest/CE>

## Appendix I: Eligibility and Investability Parameters

The specific thresholds used in determining the eligible and investable equity universe are defined below:

	Eligibility		Investability	
	<i>New Securities</i>	<i>Existing Constituents</i>	<i>New Securities</i>	<i>Existing Constituents</i>
<b>Full Market Capitalization<sup>8</sup></b>	25% of MSCI Colombia IMI cut-off	12.5% of MSCI Colombia IMI cut-off	50% of MSCI Colombia IMI cut-off	25% of MSCI Colombia IMI cut-off
<b>Free Float Adjusted Market Capitalization<sup>8</sup></b>	12.5% of MSCI Colombia IMI cut-off	6.25% of MSCI Colombia IMI cut-off	25% of MSCI Colombia IMI cut-off	12.5% of MSCI Colombia IMI cut-off
<b>3-month ATVR</b>	2.5%	1%	7.5%	2.5%
<b>12-month ATVR</b>	2.5%	1%	7.5%	2.5%
<b>3-month Frequency of trading</b>	20%	10%	40%	20%
<b>Foreign Inclusion Factor</b>	>= 0.15, except if free float adjusted market capitalization > 1.8 times the free float adjusted market capitalization cut-off noted above			

<sup>8</sup> The size-segment cutoffs for the MSCI Global Investable Market Indexes, including the MSCI Colombia IMI, are updated at each quarterly index review.

## Appendix II: Transition from the bvc COLCAP Index to the MSCI COLCAP Index

### MSCI Provisional COLCAP Index

On March 29, 2021, the MSCI Provisional COLCAP Index was launched to provide transparency to market participants ahead of the upcoming transition.

The MSCI Provisional COLCAP Index does not replace the existing bvc COLCAP Index, which will continue to be calculated until the transition to the MSCI COLCAP Index in May 2021.

The MSCI Provisional COLCAP Index is constructed by applying the Annual Index Review maintenance rules under Section 3.1 (Annual Index Review) on the existing bvc COLCAP Index at the time of the February 2021 Index Review.

The MSCI Provisional COLCAP Index is calculated starting Mar 1, 2021, and commences with the index level of the existing bvc COLCAP Index as of February 26, 2021.

Ongoing maintenance of the MSCI COLCAP Index follows the rules described in Section 3.5 (Ongoing event related changes).

The MSCI Provisional COLCAP Index will not be rebalanced at the time of the May 2021 Index Review and will instead be made to converge with the pro forma MSCI COLCAP Index. Effective May 28, 2021, the MSCI Provisional COLCAP Index will have the same composition as the MSCI COLCAP Index.

### Transition to the MSCI COLCAP Index

The existing bvc COLCAP Index will be replaced by the MSCI COLCAP Index effective May 28, 2021, coinciding with the May 2021 Index Review.

At the time of the May 2021 Index Review, Annual Index Review maintenance rules under Section 3.1 (Annual Index Review) will be applied on the existing bvc COLCAP Index to determine the pro forma MSCI COLCAP Index constituents.

The pro forma MSCI COLCAP Index will be determined based on market capitalization data as of the close of May 14, 2021<sup>9</sup> while other data, including liquidity and free float, will follow the relevant cutoff dates as per Section 3.3 (Cutoff Dates for the Rebalancing). Potential corporate events from May 17, 2021 to May 27, 2021 will be implemented in the pro forma MSCI COLCAP Index according to Section 3.5 (Ongoing event related changes). MSCI will announce the impact of any such events with advance notice. Additionally, bvc will not implement corporate events in the existing bvc COLCAP Index from May 17, 2021 to May 27, 2021.

To ensure continuity, the starting index level of MSCI COLCAP Index on May 28, 2021 will start from the last level of the existing bvc COLCAP Index as of May 27, 2021. Additionally, the MSCI COLCAP Index will maintain the historical index levels of the existing bvc COLCAP Index.

<sup>9</sup> The MSCI COLCAP Index follows the regular schedule of other MSCI Indexes that are rebalanced nine business days before the effective date of the index review. Since May 17, 2021 is a market holiday in Colombia, previous day market prices will be considered for the rebalancing.

## Appendix III: Changes to this Document

**The following sections have been modified as of November 2023:**

- 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 1: Introduction

- Added footnote on Methodology Set.

## Contact us

[msci.com/contact-us](https://msci.com/contact-us)

### AMERICAS

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

\* toll-free

### 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](https://www.msci.com).

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

## 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 disseminated 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 may include "Signals," defined as quantitative attributes or the product of methods or formulas that describe or are derived from calculations using historical data. Neither these Signals nor any description of historical data are intended to provide investment advice or a recommendation to make (or refrain from making) any investment decision or asset allocation and should not be relied upon as such. Signals are inherently backward-looking because of their use of historical data, and they are not intended to predict the future. The relevance, correlations and accuracy of Signals frequently will change materially.

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. The calculation of indexes and index returns may deviate from the stated methodology. 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](http://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 [msci.com](http://msci.com).

MSCI ESG Research LLC is a Registered Investment Adviser under the Investment Advisers Act of 1940 and a subsidiary of MSCI Inc. 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 a recommendation to make (or refrain from making) any kind of investment decision and may not be relied on as such, provided that applicable products or services from MSCI ESG Research may constitute investment advice. 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. MSCI ESG and climate ratings, research and data are produced by MSCI ESG Research LLC, a subsidiary of MSCI Inc. MSCI ESG Indexes, Analytics and Real Estate are products of MSCI Inc. that utilize information from MSCI ESG Research LLC. MSCI Indexes are administered by MSCI Limited (UK).

Please note that the issuers mentioned in MSCI ESG Research materials sometimes have commercial relationships with MSCI ESG Research and/or MSCI Inc. (collectively, "MSCI") and that these relationships create potential conflicts of interest. In some cases, the issuers or their affiliates purchase research or other products or services from one or more MSCI affiliates. In other cases, MSCI ESG Research rates financial products such as mutual funds or ETFs that are managed by MSCI's clients or their affiliates, or are based on MSCI Inc. Indexes. In addition, constituents in MSCI Inc. equity indexes include companies that subscribe to MSCI products or services. In some cases, MSCI clients pay fees based in whole or part on the assets they manage. MSCI ESG Research has taken a number of steps to mitigate potential conflicts of interest and safeguard the integrity and independence of its research and ratings. More information about these conflict mitigation measures is available in our Form ADV, available at <https://adviserinfo.sec.gov/firm/summary/169222>.

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.

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>.