

Procedures for Submission of Accounting Related Complaints

MSCI Inc. (“MSCI” or the “Company”) is committed to complying with all applicable laws and regulations regarding accounting, internal accounting controls or auditing matters (“Accounting Matters”).

The Audit and Risk Committee of the MSCI Board of Directors is responsible for oversight of procedures relating to the treatment of complaints concerning Accounting Matters.

Raising Concerns

Any person can submit a complaint in good faith regarding Accounting Matters without fear of retaliation. If you reasonably suspect any impropriety regarding an Accounting Matter, you should report what is suspected. Proof is not required to raise an issue.

Examples of impropriety include, among other things:

- Fraud or intentional error in the preparation, evaluation, review or audit of any financial statement, tax return or other financial report of the Company,
- Fraud or intentional error in the recording and maintaining of financial records of the Company,
- Deficiencies in or noncompliance with the Company’s internal accounting controls,
- Misrepresentation or false statements regarding a matter contained in the financial records, financial statements, tax returns or other financial reports of the Company,
- Deviation from full and fair reporting of the Company’s financial position, results of operations, cash flows or shareholders’ equity, or
- Taking any action to coerce, manipulate, mislead or fraudulently influence the Company’s external auditor in any way that would render the Company’s financial statements materially misleading.

Confidentiality and Non-retaliation

All complaints will be treated confidentially to the extent permitted by law and consistent with the need to conduct an appropriate investigation. MSCI prohibits retaliation against individuals who submit complaints in good faith.

What to Include

Complaints may be submitted anonymously. We encourage you to provide as much detail as possible to facilitate the Company’s ability to investigate the matter, including:

- the nature and specific details of the misconduct,
- dates and locations of incidents,
- names of individuals involved, and
- any supporting evidence.

How to Submit a Complaint

To submit a complaint regarding any Accounting Matter, please send a letter by mail or other delivery service to:

MSCI Inc.
Office of the General Counsel
250 Greenwich Street
7 World Trade Center 49th Floor
New York, NY 10007

We recommend using certified mail or an overnight delivery service with confirmation of receipt to ensure that your letter has been received.