

**S&P Low Carbon ESG  
Select Equal Weight Indices  
*Methodology***

November 2022

# Table of Contents

Introduction	3
<b>Index Objective</b>	<b>3</b>
<b>Index Family and Highlights</b>	<b>3</b>
<b>S&amp;P DJI ESG Scores</b>	<b>3</b>
<b>Carbon-to-Revenue Footprint and Water Intensity</b>	<b>4</b>
<b>Supporting Documents</b>	<b>4</b>
Eligibility Criteria and Index Construction	5
<b>S&amp;P EuroUSA 50 Low Carbon ESG Select Equal Weight Index</b>	<b>5</b>
<b>S&amp;P Eurozone 50 Low Carbon &amp; Water Intensity ESG Select Equal Weight Index</b>	<b>7</b>
<b>S&amp;P France 20 Low Carbon &amp; Water Intensity ESG Select Equal Weight Index</b>	<b>9</b>
<b>S&amp;P Transatlantic 80 Low Carbon &amp; Water Intensity ESG Select Equal Weight Index</b>	<b>11</b>
<b>S&amp;P Eurozone 25 Low Carbon &amp; Water Intensity ESG Select Plus Equal Weight Index</b>	<b>13</b>
Index Maintenance	15
<b>Index Calculations</b>	<b>15</b>
<b>Rebalancing</b>	<b>15</b>
<b>Additions and Deletions</b>	<b>15</b>
<b>Corporate Actions</b>	<b>15</b>
<b>Currency of Calculation and Additional Index Return Series</b>	<b>15</b>
<b>Base Dates and History Availability</b>	<b>16</b>
Index Data	17
<b>Calculation Return Types</b>	<b>17</b>
Index Governance	18
<b>Index Committee</b>	<b>18</b>
Index Policy	19
<b>Announcements</b>	<b>19</b>
<b>Pro-forma Files</b>	<b>19</b>
<b>Holiday Schedule</b>	<b>19</b>
<b>Rebalancing</b>	<b>19</b>
<b>Unexpected Exchange Closures</b>	<b>19</b>
<b>Recalculation Policy</b>	<b>19</b>
<b>Contact Information</b>	<b>19</b>

Index Dissemination	20
<b>Tickers</b>	<b>20</b>
<b>Index Data</b>	<b>20</b>
<b>Website</b>	<b>20</b>
Appendix I – Trucost	21
<b>Trucost Environmental Register Research Process</b>	<b>21</b>
Disclaimer	22
<b>Performance Disclosure/Back-Tested Data</b>	<b>22</b>
<b>Intellectual Property Notices/Disclaimer</b>	<b>23</b>

# Introduction

## Index Objective

The S&P Low Carbon ESG Select Equal Weight Indices measure the equal weighted performance of the highest S&P DJI ESG scoring stocks with low carbon intensities among a subset of the largest stocks, by float-adjusted market capitalization (FMC), within the respective universe, as detailed in *Eligibility Criteria and Index Construction*.

## Index Family and Highlights

- **S&P EuroUSA 50 Low Carbon ESG Select Equal Weight Index.** The index measures the performance of 50 stocks with the lowest carbon intensities among a subset of the 150 largest stocks, by float-adjusted market capitalization (FMC), within the S&P United States BMI and S&P Eurozone BMI (the “underlying indices”) that meet the sustainability criteria defined in the *Eligibility Criteria and Index Construction*, with the highest S&P DJI ESG scores. The index selects 35 constituents from the S&P Eurozone BMI and 15 constituents from the S&P United States BMI.
- **S&P Eurozone 50 Low Carbon & Water Intensity ESG Select Equal Weight Index.** The index measures the performance of 50 stocks with the lowest carbon intensities among a subset of the 150 largest stocks, by FMC, within the S&P Eurozone BMI (the “underlying index”) that meet the sustainability criteria defined in the *Eligibility Criteria and Index Construction*, with the highest S&P DJI ESG scores.
- **S&P France 20 Low Carbon & Water Intensity ESG Select Equal Weight Index.** The index measures the performance of 20 stocks with the lowest carbon intensities among a subset of the 50 largest stocks, by FMC, within the S&P France BMI (the “underlying index”) that meet the sustainability criteria defined in the *Eligibility Criteria and Index Construction*, with the highest S&P DJI ESG scores.
- **S&P Transatlantic 80 Low Carbon & Water Intensity ESG Select Equal Weight Index.** The index measures the performance of 80 stocks with the lowest carbon intensities among a subset of the 320 largest stocks, by FMC, within the S&P North America BMI and the S&P Eurozone BMI (the “underlying indices”) that meet the sustainability criteria defined in the *Eligibility Criteria and Index Construction*, with the highest S&P DJI ESG scores. The index selects 40 constituents from the S&P Eurozone BMI and 40 constituents from the S&P North America BMI
- **S&P Eurozone 25 Low Carbon & Water Intensity ESG Select Plus Equal Weight Index.** The index measures the performance of 25 stocks with the lowest carbon intensities among a subset of the 50 largest stocks, by FMC, within the S&P Eurozone BMI (the “underlying index”) that meet the size, liquidity, and sustainability criteria defined in the *Eligibility Criteria and Index Construction*, with the highest S&P DJI ESG scores.

*For more information on the respective underlying indices, please refer to the S&P Global BMI, S&P/IFCI Methodology on our Web site at [www.spglobal.com/spdji](http://www.spglobal.com/spdji).*

## S&P DJI ESG Scores

S&P DJI ESG Scores are built from the S&P Global ‘Corporate Sustainability Assessment’ (CSA). A company’s S&P DJI ESG score may either be calculated from data received directly by a company completing the comprehensive assessment (together with supporting documents), or – in the absence of this – by using publicly available information. S&P Global uses the CSA results to calculate the S&P DJI ESG Scores used in the index methodology.

For more information on the CSA process, please refer to <https://www.spglobal.com/esg/csa/>.

For more information on S&P DJI ESG Scores, please refer to the S&P DJI ESG Score Methodology.

### **Carbon-to-Revenue Footprint and Water Intensity**

For all indices, constituents within the S&P Trucost Limited (Trucost) coverage universe are assigned an annual carbon-to-revenue footprint, prior to the annual rebalancing reference date. The carbon-to-revenue footprint metric is calculated by Trucost and is defined as a company's annual GHG emissions (direct and first tier indirect), expressed as metric tons of carbon dioxide equivalent (tCO<sub>2e</sub>) emissions, divided by annual revenues for the corresponding year, expressed in millions of US dollars.

Constituents within Trucost's coverage universe are also assigned an annual Water Intensity, prior to the rebalancing reference date. The Water Intensity metric is calculated by Trucost and is defined as the sum of the volume of water directly abstracted by the company, abstracted by upstream suppliers, and the volume of water purchased from utility companies, expressed as cubic meters (m<sup>3</sup>), divided by the annual revenues for the corresponding year, expressed in millions of U.S. dollars.

For more information on Trucost's research process, please refer to *Appendix I*.

### **Supporting Documents**

This methodology is meant to be read in conjunction with supporting documents providing greater detail with respect to the policies, procedures and calculations described herein. References throughout the methodology direct the reader to the relevant supporting document for further information on a specific topic. The list of the main supplemental documents for this methodology and the hyperlinks to those documents is as follows:

<b>Supporting Document</b>	<b>URL</b>
S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology	<a href="#">Equity Indices Policies &amp; Practices</a>
S&P Dow Jones Indices' Index Mathematics Methodology	<a href="#">Index Mathematics Methodology</a>
S&P Dow Jones Indices' Float Adjustment Methodology	<a href="#">Float Adjustment Methodology</a>
S&P DJI ESG Score Methodology	<a href="#">S&amp;P DJI ESG Score Methodology</a>

The methodology is created by S&P Dow Jones Indices to achieve the aforementioned objective of measuring the underlying interest of each index governed by this methodology document. Any changes to or deviations from this methodology are made in the sole judgment and discretion of S&P Dow Jones Indices so that the index continues to achieve its objective.

# Eligibility Criteria and Index Construction

## S&P EuroUSA 50 Low Carbon ESG Select Equal Weight Index

**Eligibility Factors.** As of the rebalancing reference date, stocks must satisfy the following criteria to be eligible for index inclusion:

- Be a member of the S&P Eurozone BMI trading in euros or be a member of the S&P United States BMI trading in U.S. dollars.
- Have an S&P DJI ESG score.
- Have a carbon-to-revenue footprint as measured by Trucost<sup>1</sup>
- Multiple Share Classes and Dual Listed Companies. Each company is represented once by the Designated Listing. For more information regarding the treatment of multiple share classes, please refer to Approach B within the Multiple Share Classes section of the S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

**Controversies: Media and Stakeholder Analysis Overlay.** In addition to the above, S&P Global uses RepRisk for daily filtering, screening, and analysis of ESG risk incidents and controversial activities related to companies within the indices.

In cases where risks are presented, S&P Global releases a Media and Stakeholder Analysis (MSA) which includes a range of issues such as economic crime and corruption, fraud, illegal commercial practices, human rights issues, labor disputes, workplace safety, catastrophic accidents, and environmental disasters.

The Index Committee will review constituents flagged by S&P Global's MSA to evaluate the potential impact of controversial company activities on the composition of the indices. If the Index Committee decides to remove a company in question, that company is ineligible for re-entry into the index for one full calendar year, beginning with the subsequent rebalancing.

*For more information on RepRisk, please refer to [www.reprisk.com](http://www.reprisk.com). This service is not considered a direct contribution to the index construction process.*

**Constituent Selection.** At each rebalancing reference date, for the S&P Eurozone BMI and S&P United States BMI, separately, the selection process for index constituents is as follows:

1. Rank eligible stocks, in descending order, by company-level FMC.
2. The largest 100 companies from the S&P Eurozone BMI, and the largest 50 companies from the S&P United States BMI are selected, as follows:
  - A. All stocks ranked within the top 80% of the target stock count are selected.
  - B. Current constituents not already selected in Step A ranked within the top 120% of the target constituent count are selected until the target constituent count has been reached.

---

<sup>1</sup> RepRisk, an ESG data science company, leverages the combination of AI and machine learning with human intelligence to systematically analyze public information in 23 languages and identify material ESG risks. With daily data updates across 100+ ESG risk factors, RepRisk provides consistent, timely, and actionable data for risk management and ESG integration across a company's operations, business relationships, and investments.

- C. If, following Step B, the target constituent count is still not reached, non-constituent stocks not already selected are selected in rank order until the target constituent count is reached.
3. The selected companies from Step 2 are then ranked within their respective underlying index, in descending order by their S&P DJI ESG Score. The top 50 S&P Eurozone BMI companies and top 25 companies from the S&P United States BMI, respectively, are selected.
4. The selected companies from Step 3 are then ranked in ascending order by their carbon-to-revenue footprint within their respective underlying index. The top 35 S&P Eurozone BMI companies and top 15 S&P United States BMI companies, respectively, are selected and form the index.

**Constituent Weightings.** At each rebalancing, constituents are equal weighted.

## S&P Eurozone 50 Low Carbon & Water Intensity ESG Select Equal Weight Index

**Eligibility Factors.** As of the rebalancing reference date, stocks must satisfy the following criteria to be eligible for index inclusion:

- Be a member of the S&P Eurozone BMI trading in euros
- Have an S&P DJI ESG score.
- Have a carbon-to-revenue footprint, as measured by Trucost. Any carbon-to-revenue footprint data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a water intensity, as measured by Trucost. Any water intensity data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a median daily value traded (MDVT) of at least EUR 7 million for the three months prior to the rebalancing reference date.
- Multiple Share Classes and Dual Listed Companies. Each company is represented once by the Designated Listing. For more information regarding the treatment of multiple share classes, please refer to Approach B within the Multiple Share Classes section of the S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

**Exclusions Based on Water Intensity.** If a company does not have water intensity data, it is excluded from the index.

Companies classified under either of the following Trucost Primary Sectors are exempt from the exclusion based on Water Intensity and not included in the calculation of the 10% water intensity based cutoff below.

Trucost Primary Sector Name	Trucost Primary Sector Code
Water, Sewage, and Other Systems	221300
Hydroelectric Power	221111

Companies with a water intensity that falls within the highest 10% of water intensities from each GICS Sector within the eligible universe are excluded from the index. The underlying universe for this categorization is defined as the constituents of the S&P Eurozone BMI as of the last business day of March each year.

**Controversies: Media and Stakeholder Analysis Overlay.** In addition to the above, S&P Global uses RepRisk, a leading data science company, for daily filtering, screening, and analysis of ESG risk incidents and controversial activities related to companies within the indices.<sup>2</sup>

In cases where risks are presented, S&P Global releases a Media and Stakeholder Analysis (MSA) which includes a range of issues such as economic crime and corruption, fraud, illegal commercial practices, human rights issues, labor disputes, workplace safety, catastrophic accidents, and environmental disasters.

The Index Committee will review constituents that have been flagged by S&P Global's MSA to evaluate the potential impact of controversial company activities on the composition of the indices. If that the Index Committee decides to remove a company in question, that company would not be eligible for re-entry into the index for one full calendar year, beginning with the subsequent rebalancing.

---

<sup>2</sup> RepRisk, an ESG data science company, leverages the combination of AI and machine learning with human intelligence to systematically analyze public information in 23 languages and identify material ESG risks. With daily data updates across 100+ ESG risk factors, RepRisk provides consistent, timely, and actionable data for risk management and ESG integration across a company's operations, business relationships, and investments.



*For more information on RepRisk, please refer to [www.reprisk.com](http://www.reprisk.com). This service is not considered a direct contribution to the index construction process.*

**Constituent Selection.** At each rebalancing reference date, the selection process for index constituents is as follows:

1. Rank eligible stocks, in descending order, by company-level FMC.
2. The largest 150 companies from Step 1 are selected, as follows:
  - A. All stocks ranked within the top 80% of the target stock count are selected.
  - B. Current constituents not already selected in Step A ranked within the top 120% of the target constituent count are selected until the target constituent count has been reached.
  - C. If, following Step B, the target constituent count is still not reached, non-constituent stocks not already selected are selected in rank order until the target constituent count is reached.
3. The selected companies from Step 2 are then ranked in descending order by their S&P DJI ESG Score. The top 100 companies are selected. If the last selected company shares the same S&P DJI score with another company the company with the larger FMC is selected.
4. The selected companies from Step 3 are then ranked in ascending order by their carbon-to-revenue footprint within their respective underlying index. The top 50 companies are selected and form the index, subject to the below diversification criteria.

**Diversification Criteria.** The maximum number of constituents selected from any one GICS sector group is 15, representing a 30% cap on each GICS sector.

**Constituent Weightings.** At each rebalancing, constituents are equal weighted.

## S&P France 20 Low Carbon & Water Intensity ESG Select Equal Weight Index

**Eligibility Factors.** As of the rebalancing reference date, stocks must satisfy the following criteria to be eligible for index inclusion:

- Be a member of the S&P France BMI trading in euros
- Have an S&P DJI ESG score.
- Have a carbon-to-revenue footprint, as measured by Trucost. Any carbon-to-revenue footprint data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a water intensity, as measured by Trucost. Any water intensity data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a median daily value traded (MDVT) of at least EUR 5 million for the three months prior to the rebalancing reference date.
- Multiple Share Classes and Dual Listed Companies. Each company is represented once by the Designated Listing. For more information regarding the treatment of multiple share classes, please refer to Approach B within the Multiple Share Classes section of the S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

**Exclusions Based on Water Intensity.** If a company does not have water intensity data, it is excluded from the index.

Companies classified under either of the following Trucost Primary Sectors are exempt from the exclusion based on Water Intensity and not included in the calculation of the 10% water intensity based cutoff below.

Trucost Primary Sector Name	Trucost Primary Sector Code
Water, Sewage, and Other Systems	221300
Hydroelectric Power	221111

Companies with a water intensity that falls within the worst 10% of water intensities from each global GICS Sector within the eligible universe are excluded from the index. The global universe for this categorization is defined as the constituents of the S&P France BMI as of the last business day of March each year.

**Controversies: Media and Stakeholder Analysis Overlay.** In addition to the above, S&P Global uses RepRisk for daily filtering, screening, and analysis of ESG risk incidents and controversial activities related to companies within the indices<sup>3</sup>.

In cases where risks are presented, S&P Global releases a Media and Stakeholder Analysis (MSA) which includes a range of issues such as economic crime and corruption, fraud, illegal commercial practices, human rights issues, labor disputes, workplace safety, catastrophic accidents, and environmental disasters.

The Index Committee will review constituents that have been flagged by S&P Global's MSA to evaluate the potential impact of controversial company activities on the composition of the indices. If the Index Committee decides to remove a company in question, that company is not eligible for re-entry into the index for one full calendar year, beginning with the subsequent rebalancing.

<sup>3</sup> RepRisk, an ESG data science company, leverages the combination of AI and machine learning with human intelligence to systematically analyze public information in 23 languages and identify material ESG risks. With daily data updates across 100+ ESG risk factors, RepRisk provides consistent, timely, and actionable data for risk management and ESG integration across a company's operations, business relationships, and investments.

**Constituent Selection.** At each rebalancing reference date, the selection process for index constituents is as follows:

1. Rank eligible stocks, in descending order, by company-level FMC.
2. The largest 50 companies from Step 1 are selected, as follows:
  - A. All stocks ranked within the top 80% of the target stock count are selected.
  - B. Current constituents not already selected in Step A ranked within the top 120% of the target constituent count are selected until the target constituent count has been reached.
  - C. If, following Step B, the target constituent count is still not reached, non-constituent stocks not already selected are selected in rank order until the target constituent count is reached.
3. The selected companies from Step 2 are then ranked in descending order by their S&P DJI ESG Score. The top 30 companies are selected. If the last selected company shares the same S&P DJI score with another company the company with the larger FMC is selected.
4. The selected companies from Step 3 are then ranked in ascending order by their carbon intensity within their respective underlying index. The top 20 companies are selected and form the index, subject to the below diversification criteria.

**Diversification Criteria.** The maximum number of constituents selected from any one GICS sector group is 6, representing a 30% cap on each GICS sector.

**Constituent Weightings.** At each rebalancing, constituents are equal weighted.

## S&P Transatlantic 80 Low Carbon & Water Intensity ESG Select Equal Weight Index

**Eligibility Factors.** As of the rebalancing reference date, stocks must satisfy the following criteria to be eligible for index inclusion:

- Be a member of one of the following:
  - S&P Eurozone BMI trading in euros, or
  - S&P North America BMI trading in either U.S. dollars or Canadian dollars.
- Have an S&P DJI ESG score.
- Have a carbon-to-revenue footprint, as measured by Trucost. Any carbon-to-revenue footprint data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a water intensity, as measured by Trucost. Any water intensity data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a median daily value traded (MDVT) of at least EUR 7 million for the three months prior to the rebalancing reference date.
- Multiple Share Classes and Dual Listed Companies. Each company is represented once by the Designated Listing. For more information regarding the treatment of multiple share classes, please refer to Approach B within the Multiple Share Classes section of the S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

**Exclusions Based on Water Intensity.** If a company does not have water intensity data, it is excluded from the index.

Companies classified under either of the following Trucost Primary Sectors are exempt from the exclusion based on Water Intensity and not included in the calculation of the 10% water intensity-based cutoff below.

Trucost Primary Sector Name	Trucost Primary Sector Code
Water, Sewage, and Other Systems	221300
Hydroelectric Power	221111

Companies with a water intensity ranked in the highest 10% of water intensities from each GICS Sector within each eligible universe are excluded from the index. The water intensity exclusion process is applied to each underlying index separately and concurrently.

**Controversies: Media and Stakeholder Analysis Overlay.** In addition to the above, S&P Global uses RepRisk for daily filtering, screening, and analysis of ESG risk incidents and controversial activities related to companies within the indices.<sup>4</sup>

In cases where risks are presented, S&P Global releases a Media and Stakeholder Analysis (MSA) which includes a range of issues such as economic crime and corruption, fraud, illegal commercial practices, human rights issues, labor disputes, workplace safety, catastrophic accidents, and environmental disasters.

The Index Committee will review constituents that have been flagged by S&P Global's MSA to evaluate the potential impact of controversial company activities on the composition of the indices. If the Index

---

<sup>4</sup> RepRisk, an ESG data science company, leverages the combination of AI and machine learning with human intelligence to systematically analyze public information in 23 languages and identify material ESG risks. With daily data updates across 100+ ESG risk factors, RepRisk provides consistent, timely, and actionable data for risk management and ESG integration across a company's operations, business relationships, and investments.

Committee decides to remove a company in question, that company is not eligible for re-entry into the index for one full calendar year, beginning with the subsequent rebalancing.

*For more information on RepRisk, please refer to [www.reprisk.com](http://www.reprisk.com). This service is not considered a direct contribution to the index construction process.*

**Constituent Selection.** At each rebalancing reference date, for the S&P Eurozone BMI and S&P North America BMI, separately, the selection process for index constituents is as follows:

1. Rank eligible stocks, in descending order, by company-level FMC.
2. The largest 160 companies from Step 1 are selected, as follows:
  - A. All stocks ranked within the top 80% of the target stock count are selected.
  - B. Current constituents not already selected in Step A ranked within the top 120% of the target constituent count are selected until the target constituent count has been reached.
  - C. If, following Step B, the target constituent count is still not reached, non-constituent stocks not already selected are selected in rank order until the target constituent count is reached.
3. The selected companies from Step 2 are then ranked in descending order by their S&P DJI ESG Score. The top 80 companies are selected. If the last selected company shares the same S&P DJI score with another company the company with the larger FMC is selected.
4. The selected companies from Step 3 are then ranked in ascending order by their carbon-to-revenue footprint within their respective underlying index. The top 40 companies from each underlying index are selected and form the index, subject to the below diversification criteria.

**Diversification Criteria.** A maximum of 12 constituents per single GICS Sector can be selected from each underlying index, representing a 30% cap on each GICS sector. If, as a result of this criteria, it is not possible to select 40 stocks from the underlying index, the maximum number of constituents allowed will be increased by 1 until a solution is found.

**Constituent Weightings.** At each rebalancing, constituents are equal weighted.

## S&P Eurozone 25 Low Carbon & Water Intensity ESG Select Plus Equal Weight Index

**Eligibility Factors.** As of the rebalancing reference date, stocks must satisfy the following criteria to be eligible for index inclusion:

- Be a member of the S&P Eurozone BMI trading in euros
- Have an S&P DJI ESG score.
- Have a carbon-to-revenue footprint, as measured by Trucost. Any carbon-to-revenue footprint data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a water intensity, as measured by Trucost. Any water intensity data with a Trucost financial year four years or more prior to the rebalancing reference date's year are considered as not covered.
- Have a median daily value traded (MDVT) of at least EUR 50 million for the three months prior to the rebalancing reference date (EUR 40 million for current index constituents)
- Have a float market capitalization (FMC) of at least EUR 5 billion (EUR 4 billion for current index constituents).
- Multiple Share Classes and Dual Listed Companies. Each company is represented once by the Designated Listing. For more information regarding the treatment of multiple share classes, please refer to Approach B within the Multiple Share Classes section of the S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

**Exclusions Based on Water Intensity.** If a company does not have water intensity data, it is excluded from the index.

Companies classified under either of the following Trucost Primary Sectors are exempt from the exclusion based on Water Intensity and not included in the calculation of the 10% water intensity based cutoff below.

Trucost Primary Sector Name	Trucost Primary Sector Code
Water, Sewage, and Other Systems	221300
Hydroelectric Power	221111

Companies with a water intensity that falls within the highest 10% of water intensities from each GICS Sector within the eligible universe are excluded from the index. The underlying universe for this categorization is defined as the constituents of the S&P Eurozone BMI as of the last business day of March each year.

**Controversies: Media and Stakeholder Analysis Overlay.** In addition to the above, S&P Global uses RepRisk for daily filtering, screening, and analysis of ESG risk incidents and controversial activities related to companies within the indices<sup>5</sup>.

In cases where risks are presented, S&P Global releases a Media and Stakeholder Analysis (MSA) which includes a range of issues such as economic crime and corruption, fraud, illegal commercial practices, human rights issues, labor disputes, workplace safety, catastrophic accidents, and environmental disasters.

The Index Committee will review constituents that have been flagged by S&P Global's MSA to evaluate the potential impact of controversial company activities on the composition of the indices. If the Index

---

<sup>5</sup> RepRisk, an ESG data science company, leverages the combination of AI and machine learning with human intelligence to systematically analyze public information in 23 languages and identify material ESG risks. With daily data updates across 100+ ESG risk factors, RepRisk provides consistent, timely, and actionable data for risk management and ESG integration across a company's operations, business relationships, and investments.

Committee decides to remove a company in question, that company is not eligible for re-entry into the index for one full calendar year, beginning with the subsequent rebalancing.

*For more information on RepRisk, please refer to [www.reprisk.com](http://www.reprisk.com). This service is not considered a direct contribution to the index construction process.*

**Constituent Selection.** At each rebalancing reference date, the selection process for index constituents is as follows:

1. Rank eligible stocks, in descending order, by company-level FMC.
2. The largest 50 companies from Step 1 are selected, as follows:
  - A. All stocks ranked within the top 80% of the target constituent count are selected.
  - B. Current constituents not already selected in Step A ranked within the top 120% of the target constituent count are selected until the target constituent count has been reached.
  - C. If, following Step B, the target constituent count is still not reached, non-constituent stocks not already selected are selected in rank order until the target constituent count is reached.
3. The selected companies from Step 2 are then ranked in descending order by S&P DJI ESG Score. The top 35 companies are selected. If the last selected company shares the same S&P DJI score with another company, the company with the larger FMC is selected.
4. The selected companies from Step 3 are then ranked in ascending order by carbon-to-revenue footprint. The top 25 companies are selected and form the index, subject to the below diversification criteria.

**Diversification Criteria.** A maximum of seven constituents per single GICS Sector can be selected from each underlying index, representing a 30% cap on each GICS sector. If, as a result of this criteria, it is not possible to select 25 stocks from the underlying index, the maximum number of constituents allowed will be increased by 1 until a solution is found.

**Constituent Weightings.** At each rebalancing, constituents are equal weighted.

# Index Maintenance

## Index Calculations

The index calculates by means of the divisor methodology used in all S&P Dow Jones Indices' equity indices.

*For more information on the index calculation methodology, please refer to the Equal Weighted Indices section of S&P Dow Jones Indices' Index Mathematics Methodology.*

## Rebalancing

**Annual Reconstitution.** The indices are reconstituted annually, effective after the close of the last business day of April. The reconstitution reference date is the last business day of March.

**Quarterly Reweighting.** The indices reweight quarterly, effective after the close of the last business day of January, April, July, and October. Constituents' index shares are calculated using closing prices seven business day prior to the effective date. Index shares are calculated and assigned to each stock to arrive at the weights determined on the reference date. Since index shares are assigned based on prices prior to rebalancing, the actual weight of each stock at the rebalancing may differ from these weights due to market movements.

## Additions and Deletions

**Additions.** Except for spin-offs, no stocks are added to the indices between rebalancings.

**Deletions.** If a stock is removed from the index universe, it is also removed from the index simultaneously. Between rebalancings, a stock can be deleted from the index due to corporate events such as mergers, takeovers, delistings, suspensions, spin-offs/demergers or bankruptcies, or due to an MSA being raised.

**Spin-offs.** A spin-off is added to the index on the ex-date at a price of zero and is removed after at least one day of regular way trading. The spin-off index shares are based on the spin-off ratio. On the ex-date the spin-off will have the same attributes and capping adjustment factor (AWF) as its parent company and will remain in the index for at least one trading day. As a result, there will be no change to the index divisor on the ex-date. The weight of the spin-off is re-invested back into the parent stock on the deletion date. There will be no divisor adjustment in this case.

## Corporate Actions

For more information on Corporate Actions, please refer to the *Equal Weighted Indices* section of *S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology*.

## Currency of Calculation and Additional Index Return Series

The indices calculate in euros.

WM/Refinitiv foreign exchange rates are taken daily at 04:00 PM London Time and used in the end-of-day calculation of the index. These mid-market fixings are calculated by The WM Company based on Refinitiv data and appear on Refinitiv pages WMRA.

In addition to the indices detailed in this methodology, additional return series versions of the indices may be available, including, but not limited to the following: currency, currency hedged, decrement, fair value,



inverse, leveraged, and risk control versions. For a list of available indices, please refer to the [S&P DJI Methodology & Regulatory Status Database](#).

For information on the index calculation, please refer to S&P Dow Jones Indices' Index Mathematics Methodology.

For the inputs necessary to calculate certain types of indices, including decrement, dynamic hedged, fair value, and risk control indices, please refer to the Parameters documents available at [www.spglobal.com/spdji](http://www.spglobal.com/spdji).

### Base Dates and History Availability

Index history availability, base dates, and base values are:

Index	Launch Date	First Value Date	Base Date	Base Value
S&P EuroUSA 50 Low Carbon ESG Select Equal Weight Index	02/01/2021	04/30/2010	04/30/2010	1000
S&P Eurozone 50 Low Carbon & Water Intensity ESG Select Equal Weight Index	10/25/2021	04/30/2010	04/30/2010	1000
S&P France 20 Low Carbon & Water Intensity ESG Select Equal Weight Index	10/25/2021	04/30/2010	04/30/2010	1000
S&P Transatlantic 80 Low Carbon & Water Intensity ESG Select Equal Weight Index	04/04/2021	04/30/2010	04/30/2010	1000
S&P Eurozone 25 Low Carbon & Water Intensity ESG Select Plus Equal Weight Index	04/04/2021	04/30/2010	04/30/2010	1000

# Index Data

## Calculation Return Types

S&P Dow Jones Indices calculates multiple return types which vary based on the treatment of regular cash dividends. The classification of regular cash dividends is determined by S&P Dow Jones Indices.

- Price Return (PR) versions are calculated without adjustments for regular cash dividends.
- Gross Total Return (TR) versions reinvest regular cash dividends at the close on the ex-date without consideration for withholding taxes.
- Net Total Return (NTR) versions, if available, reinvest regular cash dividends at the close on the ex-date after the deduction of applicable withholding taxes.

In the event there are no regular cash dividends on the ex-date, the daily performance of all three indices will be identical.

For a complete list of indices available, please refer to the daily index levels file (".SDL").

*For more information on the classification of regular versus special cash dividends as well as the tax rates used in the calculation of net return, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.*

*For more information on the calculation of return types, please refer to S&P Dow Jones Indices' Index Mathematics Methodology.*

# Index Governance

## Index Committee

An S&P Dow Jones Indices Index Committee maintains the indices. At each meeting, the Index Committee reviews pending corporate actions that may affect index constituents, statistics comparing the composition of the index to the market, companies that are being considered as candidates for addition to the index, and any significant market events. In addition, the Index Committee may revise index policy covering rules for selecting companies, treatment of dividends, share counts or other matters.

S&P Dow Jones Indices considers information about changes to its indices and related matters to be potentially market moving and material. Therefore, all Index Committee discussions are confidential.

S&P Dow Jones Indices' Index Committees reserve the right to make exceptions when applying the methodology if the need arises. In any scenario where the treatment differs from the general rules stated in this document or supplemental documents, clients will receive sufficient notice, whenever possible.

In addition to the daily governance of indices and maintenance of index methodologies, at least once within any 12-month period, the Index Committee reviews the methodology to ensure the indices continue to achieve the stated objectives, and that the data and methodology remain effective. In certain instances, S&P Dow Jones Indices may publish a consultation inviting comments from external parties.

*For information on Quality Assurance and Internal Reviews of Methodology, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.*

# Index Policy

## Announcements

All index constituents are evaluated daily for data needed to calculate index levels and returns. All events affecting the daily index calculation are typically announced in advance via the Index Corporate Events report (.SDE), delivered daily to all clients. Any unusual treatment of a corporate action or short notice of an event may be communicated via email to clients.

*For more information, please refer to the Announcements section of S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.*

## Pro-forma Files

In addition to the corporate events file (.SDE), S&P Dow Jones Indices provides constituent pro-forma files each time the index rebalances. The pro-forma file is typically provided daily in advance of the rebalancing date and contains all constituents as well as their corresponding weights and index shares effective for the upcoming rebalancing.

*Please visit [www.spglobal.com/spdji](http://www.spglobal.com/spdji) for a complete schedule of rebalancing timelines and pro-forma delivery times.*

## Holiday Schedule

The index is calculated daily, throughout the calendar year. The only days the index is not calculated are on days when all exchanges where the index's constituents are listed are officially closed or if WM/Reuters' exchange rates services are not published.

*A complete holiday schedule for the year is available at [www.spglobal.com/spdji](http://www.spglobal.com/spdji).*

## Rebalancing

The Index Committee may change the date of a given rebalancing for reasons including market holidays occurring on or around the scheduled rebalancing date. Any such change will be announced with proper advance notice where possible.

## Unexpected Exchange Closures

For information on Unexpected Exchange Closures, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

## Recalculation Policy

For information on the recalculation policy, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.

*For information on Calculations and Pricing Disruptions, Expert Judgment and Data Hierarchy, please refer to S&P Dow Jones Indices' Equity Indices Policies & Practices Methodology.*

## Contact Information

For any questions regarding an index, please contact: [index\\_services@spglobal.com](mailto:index_services@spglobal.com).

# Index Dissemination

Index levels are available through S&P Dow Jones Indices' Web site at [www.spglobal.com/spdji](http://www.spglobal.com/spdji), major quote vendors (see codes below), numerous investment-oriented Web sites, and various print and electronic media.

## Tickers

The table below lists headline indices covered by this document. All versions of the below indices that may exist are also covered by this document. Please refer to the [S&P DJI Methodology & Regulatory Status Database](#) for a complete list of indices covered by this document.

Index (Currency)	Return Type	Bloomberg	RIC
S&P EuroUSA 50 Low Carbon ESG Select Equal Weight Index (EUR)	Price Return	SPEU5EEP	.SPEU5EEP
	Total Return	SPEU5EET	.SPEU5EET
	Net Total Return	SPEU5EEN	.SPEU5EEN
S&P Eurozone 50 Low Carbon & Water Intensity ESG Select Equal Weight Index (EUR)	Price Return	SPE5LWEP	.SPE5LWEP
	Total Return	SPE5LWET	.SPE5LWET
	Net Total Return	SPE5LWEN	.SPE5LWEN
S&P France 20 Low Carbon & Water Intensity ESG Select Equal Weight Index (EUR)	Price Return	SPF2LDEP	.SPF2LDEP
	Total Return	SPF2LDET	.SPF2LDET
	Net Total Return	SPF2LDEN	.SPF2LDEN
S&P Transatlantic 80 Low Carbon & Water Intensity ESG Select Equal Weight Index (EUR)	Price Return	SPTLWPEP	.SPTLWPEP
	Total Return	SPTLWPET	.SPTLWPET
	Net Total Return	SPTLWPEN	.SPTLWPEN
S&P Eurozone 25 Low Carbon & Water Intensity ESG Select Plus Equal Weight Index (EUR)	Price Return	SPELWPEP	.SPELWPE.P
	Total Return	SPELWPET	.SPELWPET
	Net Total Return	SPELWPEN	.SPELWPEN

## Index Data

Daily constituent and index level data are available via subscription.

For product information, please contact S&P Dow Jones Indices, [www.spglobal.com/spdji/contact-us/](http://www.spglobal.com/spdji/contact-us/).

## Website

For further information, please refer to S&P Dow Jones Indices' Web site at [www.spglobal.com/spdji](http://www.spglobal.com/spdji).

# Appendix I – Trucost

## Trucost Environmental Register Research Process

1. Map company business segments. Trucost maps company business segments to more than 450 business activities in the Trucost model. The model is based on the North American Industry Classification System (NAICS), but goes into greater granularity in some areas, such as power generating utilities.
2. Estimate data-modelled profile. Once company business segments have been mapped to Trucost sectors and their share of revenue apportioned to each, Trucost is able to efficiently generate a data-modelled profile for the company. Trucost uses its environmentally extended input-output (EEIO) model to estimate data for over 800 environmental and operational metrics across the entire operations of companies; from the raw materials they depend on in their supply chains to the electricity they purchase to power their operations.
3. Collect public disclosure. Trucost searches for environmental performance information in annual reports, sustainability reports, websites, and other publicly disclosed sources. Third party datasets, like disclosures to the CDP12, are also reviewed. Trucost then standardizes reported environmental performance data to best practice guidelines so that it can be compared across companies, regions, and business activities. To correct errors in company reporting, data control procedures are applied, including sector specialist data reviews, automated outlier identifications and year-on-year comparisons. Wherever a material metric is not disclosed, Trucost uses the modelled value, to estimate the missing data fields.
4. Engage with company. Trucost then conducts an annual engagement with each company, providing the opportunity to verify environmental performance and provide additional information. Companies are further welcomed to contact Trucost analysts at any point in their environmental reporting cycle to provide their most recently available data. This supports Trucost's efforts to utilize the most up-to-date company information and to maximize data quality.

**Greenhouse Gas Emissions Data.** The indices use Trucost's greenhouse gas emissions dataset. Quantities of greenhouse gas emissions are normalized by sales to calculate the company's carbon intensity, or "carbon-to-revenue footprint". The indices use direct and first-tier indirect emissions in the determination of the carbon-to-revenue footprints. For more information on these emissions scopes, and more, please refer to the [Trucost FAQ](#).

**Water Intensity Data.** The indices use Trucost's water intensity dataset. The Water Intensity metric is calculated by Trucost and is defined as the sum of the volume of water directly abstracted by the company, abstracted by upstream suppliers, and the volume of water purchased from utility companies, expressed as cubic meters (m<sup>3</sup>), divided by the annual revenues for the corresponding year, expressed in millions of US dollars

For more information on these data points, and more, please refer to the [Trucost FAQ](#).

For more information on Trucost, please refer to [www.trucost.com](http://www.trucost.com).

# Disclaimer

## Performance Disclosure/Back-Tested Data

Where applicable, S&P Dow Jones Indices and its index-related affiliates (“S&P DJI”) defines various dates to assist our clients in providing transparency. The First Value Date is the first day for which there is a calculated value (either live or back-tested) for a given index. The Base Date is the date at which the index is set to a fixed value for calculation purposes. The Launch Date designates the date when the values of an index are first considered live: index values provided for any date or time period prior to the index’s Launch Date are considered back-tested. S&P DJI defines the Launch Date as the date by which the values of an index are known to have been released to the public, for example via the company’s public website or its data feed to external parties. For Dow Jones-branded indices introduced prior to May 31, 2013, the Launch Date (which prior to May 31, 2013, was termed “Date of introduction”) is set at a date upon which no further changes were permitted to be made to the index methodology, but that may have been prior to the Index’s public release date.

Please refer to the methodology for the Index for more details about the index, including the manner in which it is rebalanced, the timing of such rebalancing, criteria for additions and deletions, as well as all index calculations.

Information presented prior to an index’s launch date is hypothetical back-tested performance, not actual performance, and is based on the index methodology in effect on the launch date. However, when creating back-tested history for periods of market anomalies or other periods that do not reflect the general current market environment, index methodology rules may be relaxed to capture a large enough universe of securities to simulate the target market the index is designed to measure or strategy the index is designed to capture. For example, market capitalization and liquidity thresholds may be reduced. In addition, forks have not been factored into the back-test data with respect to the S&P Cryptocurrency Indices. For the S&P Cryptocurrency Top 5 & 10 Equal Weight Indices, the custody element of the methodology was not considered; the back-test history is based on the index constituents that meet the custody element as of the Launch Date. Back-tested performance reflects application of an index methodology and selection of index constituents with the benefit of hindsight and knowledge of factors that may have positively affected its performance, cannot account for all financial risk that may affect results and may be considered to reflect survivor/look ahead bias. Actual returns may differ significantly from, and be lower than, back-tested returns. Past performance is not an indication or guarantee of future results.

Typically, when S&P DJI creates back-tested index data, S&P DJI uses actual historical constituent-level data (e.g., historical price, market capitalization, and corporate action data) in its calculations. As ESG investing is still in early stages of development, certain datapoints used to calculate certain ESG indices may not be available for the entire desired period of back-tested history. The same data availability issue could be true for other indices as well. In cases when actual data is not available for all relevant historical periods, S&P DJI may employ a process of using “Backward Data Assumption” (or pulling back) of ESG data for the calculation of back-tested historical performance. “Backward Data Assumption” is a process that applies the earliest actual live data point available for an index constituent company to all prior historical instances in the index performance. For example, Backward Data Assumption inherently assumes that companies currently not involved in a specific business activity (also known as “product involvement”) were never involved historically and similarly also assumes that companies currently involved in a specific business activity were involved historically too. The Backward Data Assumption allows the hypothetical back-test to be extended over more historical years than would be feasible using only actual data. For more information on “Backward Data Assumption” please refer to the FAQ. The methodology and factsheets of any index that employs backward assumption in the back-tested history will explicitly state so. The methodology will include an Appendix with a table setting forth the specific

data points and relevant time period for which backward projected data was used. Index returns shown do not represent the results of actual trading of investable assets/securities. S&P DJI maintains the index and calculates the index levels and performance shown or discussed but does not manage any 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 investment funds that are intended to track the performance of the Index. The imposition of these fees and charges would cause actual and back-tested performance of the securities/fund to be lower than the Index performance shown. As a simple example, if an index returned 10% on a US \$100,000 investment for a 12-month period (or US \$10,000) and an actual asset-based fee of 1.5% was imposed at the end of the period on the investment plus accrued interest (or US \$1,650), the net return would be 8.35% (or US \$8,350) for the year. Over a three-year period, an annual 1.5% fee taken at year end with an assumed 10% return per year would result in a cumulative gross return of 33.10%, a total fee of US \$5,375, and a cumulative net return of 27.2% (or US \$27,200).

### **Intellectual Property Notices/Disclaimer**

© 2022 S&P Dow Jones Indices. All rights reserved. S&P, S&P 500, SPX, SPY, The 500, US500, US 30, S&P 100, S&P COMPOSITE 1500, S&P 400, S&P MIDCAP 400, S&P 600, S&P SMALLCAP 600, S&P GIVI, GLOBAL TITANS, DIVIDEND ARISTOCRATS, Select Sector, S&P MAESTRO, S&P PRISM, S&P STRIDE, GICS, SPIVA, SPDR, INDEXOLOGY, iTraxx, iBoxx, ABX, ADBI, CDX, CMBX, MBX, MCDX, PRIMEX, HHPI, and SOVX are registered trademarks of S&P Global, Inc. ("S&P Global") or its affiliates. DOW JONES, DJIA, THE DOW and DOW JONES INDUSTRIAL AVERAGE are trademarks of Dow Jones Trademark Holdings LLC ("Dow Jones"). These trademarks together with others have been licensed to S&P Dow Jones Indices LLC. Redistribution or reproduction in whole or in part are prohibited without written permission of S&P Dow Jones Indices LLC. This document does not constitute an offer of services in jurisdictions where S&P DJI does not have the necessary licenses. Except for certain custom index calculation services, all information provided by S&P DJI is impersonal and not tailored to the needs of any person, entity, or group of persons. S&P DJI receives compensation in connection with licensing its indices to third parties and providing custom calculation services. Past performance of an index is not an indication or guarantee of future results.

It is not possible to invest directly in an index. Exposure to an asset class represented by an index may be available through investable instruments based on that index. S&P DJI does not sponsor, endorse, sell, promote or manage any investment fund or other investment vehicle that is offered by third parties and that seeks to provide an investment return based on the performance of any index. S&P DJI makes no assurance that investment products based on the index will accurately track index performance or provide positive investment returns. S&P DJI is not an investment advisor, commodity trading advisor, fiduciary, "promoter" (as defined in the Investment Company Act of 1940, as amended) or "expert" as enumerated within 15 U.S.C. § 77k(a), and S&P DJI makes no representation regarding the advisability of investing in any such investment fund or other investment vehicle. A decision to invest in any such investment fund or other investment vehicle should not be made in reliance on any of the statements set forth in this document. S&P DJI is not a tax advisor. Inclusion of a security, commodity, crypto currency, or other asset within an index is not a recommendation by S&P DJI to buy, sell, or hold such security, commodity, crypto currency, or other asset, nor is it considered to be investment or trading advice.

These materials have been prepared solely for informational purposes based upon information generally available to the public and from sources believed to be reliable. No content contained in these materials (including index data, ratings, credit-related analyses and data, research, valuations, model, software or other application or output therefrom) or any part thereof ("Content") may be modified, reverse engineered, reproduced, or distributed in any form or by any means, or stored in a database or retrieval system, without the prior written permission of S&P DJI. The Content shall not be used for any unlawful or unauthorized purposes. S&P DJI and its third-party data providers and licensors (collectively "S&P Dow Jones Indices Parties") do not guarantee the accuracy, completeness, timeliness, or availability of the Content. S&P Dow Jones Indices Parties are not responsible for any errors or omissions, regardless of the cause, for the results obtained from the use of the Content. THE CONTENT IS PROVIDED ON AN "AS IS" "WHERE IS" BASIS. S&P DOW JONES INDICES PARTIES DISCLAIMS ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF



MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE OR HARDWARE CONFIGURATION. In no event shall S&P Dow Jones Indices Parties be liable to any party for any direct, indirect, incidental, exemplary, compensatory, punitive, special, or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related information and other analyses, including ratings, research and valuations are generally provided by licensors and/or affiliates of S&P Dow Jones Indices, including but not limited to S&P Global's other divisions such as S&P Global Market Intelligence. Any credit-related information and other related analyses and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. Any opinion, analyses and rating acknowledgement decisions are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P Dow Jones Indices does not assume any obligation to update the Content following publication in any form or format. The Content 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. S&P DJI does not act as a fiduciary or an investment advisor. While S&P DJI has obtained information from sources it believes to be reliable, S&P DJI does not perform an audit or undertake independent verification of any information it receives. S&P DJI reserves the right to vary or discontinue any index at any time for regulatory or other reasons. Various factors, including external factors beyond S&P DJI's control might necessitate material changes to indices.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P Global Ratings reserves the right to assign, withdraw or suspend such acknowledgement at any time and in its sole discretion. S&P Dow Jones Indices, including S&P Global Ratings, disclaim any duty whatsoever arising out of the assignment, withdrawal, or suspension of an acknowledgement as well as any liability for any damage alleged to have been suffered on account thereof. Affiliates of S&P Dow Jones Indices LLC, including S&P Global Ratings, may receive compensation for its ratings and certain credit-related analyses, normally from issuers or underwriters of securities or from obligors. Such affiliates of S&P Dow Jones Indices LLC, including S&P Global Ratings, reserve the right to disseminate its opinions and analyses. Public ratings and analyses from S&P Global Ratings are made available on its Web sites, [www.standardandpoors.com](http://www.standardandpoors.com) (free of charge), and [www.ratingsdirect.com](http://www.ratingsdirect.com) and [www.globalcreditportal.com](http://www.globalcreditportal.com) (subscription), and may be distributed through other means, including via S&P Global Ratings publications and third-party redistributors. Additional information about our ratings fees is available at [www.standardandpoors.com/usratingsfees](http://www.standardandpoors.com/usratingsfees).

S&P Global keeps certain activities of its various divisions and business units separate from each other to preserve the independence and objectivity of their respective activities. As a result, certain divisions and business units of S&P Global may have information that is not available to other business units. S&P Global has established policies and procedures to maintain the confidentiality of certain nonpublic information received in connection with each analytical process.

In addition, S&P Dow Jones Indices provides a wide range of services to, or relating to, many organizations, including issuers of securities, investment advisers, broker-dealers, investment banks, other financial institutions, and financial intermediaries, and accordingly may receive fees or other economic benefits from those organizations, including organizations whose securities or services they may recommend, rate, include in model portfolios, evaluate, or otherwise address.

Some indices use the Global Industry Classification Standard (GICS<sup>®</sup>), which was developed by, and is the exclusive property and a trademark of, S&P Global and MSCI. Neither MSCI, S&P DJI nor any other party involved in making or compiling any GICS classifications makes any express or implied warranties or representations with respect to such standard or classification (or the results to be obtained by the use thereof), and all such parties hereby expressly disclaim all warranties of originality, accuracy,

completeness, merchantability, or fitness for a particular purpose with respect to any of such standard or classification. Without limiting any of the foregoing, in no event shall MSCI, S&P DJI, any of their affiliates or any third party involved in making or compiling any GICS classifications have any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

S&P Dow Jones Indices products are governed by the terms and conditions of the agreements under which they may be provided. A license is required from S&P Dow Jones Indices to display, create derivative works of and/or distribute any product or service that uses, is based upon and/or refers to any S&P Dow Jones Indices and/or index data.