ESG Ratings – Global Policy

Effective Date: July 17, 2026
Owner: Head of Research & Methodology, Morningstar Sustainalytics
Applies to: Analytical Personnel and Data Personnel

I. Purpose and Scope

The ESG Ratings – Global Policy ("Policy") sets out the principles for the issuance, publication and distribution of Morningstar Sustainalytics' ESG Ratings in accordance with applicable regulations, policies and procedures.

This Policy applies to all Morningstar Sustainalytics Covered Personnel globally.

Terms capitalized throughout this Policy are defined herein or in the Glossary.

II. ESG Ratings: Scope and Limitations

A. ESG Ratings represent Morningstar Sustainalytics' own opinion.

B. Morningstar Sustainalytics' ESG Ratings involve both quantitative and qualitative factors.

C. Morningstar Sustainalytics' ESG Ratings provide an opinion of a rated item entity on either exposure to risk, driven by ESG-related factors or its ESG-related impacts, or a combination of both. Morningstar Sustainalytics' ESG Ratings are not statements of fact.

D. Morningstar Sustainalytics' ESG Ratings may address environmental, social and human rights, and governance factors individually or as an aggregated assessment, depending on the rated item entity being assessed or legal requirements.

E. Morningstar Sustainalytics' ESG Ratings are based on an analysis of all reasonably available relevant public information in accordance with applicable rating Methodologies, and established policies and procedures.

F. Morningstar Sustainalytics uses rating symbols and other numeric and alphabetic markers to assign and monitor ESG Ratings as a concise method of expressing its opinions to the market. However, there exist varying degrees of risk and impact within these ESG Rating categories. Morningstar Sustainalytics does not assert that ESG Ratings in the same category indicate the same risk or impact.

G. Morningstar Sustainalytics is not an investment advisor, nor does it provide investment, financial, or other advice. None of its ESG Ratings should be construed as financial, investment, tax, legal, or other advice, or a recommendation, solicitation, endorsement, expert opinion or offer to buy, hold, or sell any security, other investment, or make any investment, financial, or other decision. ESG Ratings make no assessment of the appropriateness of ownership for any given investor within their investment objectives.

III. Solicited and Unsolicited ESG Ratings

A. All ESG Ratings issued by Morningstar Sustainalytics are unsolicited ESG Ratings, except for certain ESG Ratings for Portfolio & Funds products, which may be solicited ESG Ratings.

B. For unsolicited ESG Ratings, rated items or related third parties are informed in advance that they will be rated in accordance with applicable law (for further detail, see Part IV, Principle I below). Rated item entities do not participate in the rating process. Morningstar Sustainalytics does not engage with the management body of rated item entities nor access the internal documents of rated item entities for the purposes of such ESG Ratings.

C. For solicited ESG Ratings for Portfolio & Funds products, rated item entities provide relevant data regarding the rated item directly to Morningstar Sustainalytics. Morningstar Sustainalytics does not otherwise engage with the management body of rated item entities nor access internal documents of rated item entities for the purposes of such ESG Ratings.

IV. Key Principles Applicable to ESG Ratings

A. ESG Ratings issued by Morningstar Sustainalytics reflect Morningstar Sustainalytics' own opinion.

B. Morningstar Sustainalytics maintains governance arrangements, including both a clear organizational structure with well-defined, transparent, and consistent roles and responsibilities for individuals involved in the provision of ESG Ratings. Further, Morningstar Sustainalytics maintains a permanent, independent and effective oversight body to ensure oversight of the coordination of control mechanisms and functions relevant to the provision of its ESG Ratings.

C. Morningstar Sustainalytics maintains internal due diligence and conflicts of interest policies and procedures designed to ensure the independence and accuracy of its ESG Ratings Activities, including from all political and economic influences or constraints, and any business or other relationships and interests.

D. Morningstar Sustainalytics determines ESG Ratings in accordance with defined, product-specific ESG Methodologies, which have been developed, reviewed and approved [to be rigorous, systematic, independent and capable of justification / in accordance with the EU ESG Ratings Regulations]. Morningstar Sustainalytics applies its ESG Methodologies continuously and in a transparent manner and reviews its ESG Methodologies on an ongoing basis and at least annually.

E. Information relating to Morningstar Sustainalytics' ESG Ratings and the relevant Methodologies is appropriately disclosed to the public, and / or to users of ESG Ratings, rated items and rated item entities, on an ongoing basis, as required by applicable law.

F. Morningstar Sustainalytics employs adequate and effective systems, resources and procedures designed to ensure that its ESG Ratings are issued, published and distributed in accordance with the EU ESG Rating Regulation. Morningstar Sustainalytics monitors and evaluates the adequacy and effectiveness of such systems, resources and procedures at least annually and takes appropriate measures to address any deficiencies.

G. Morningstar Sustainalytics maintains policies and procedures to ensure that ESG Ratings are based on a thorough analysis of all the information available to it that is relevant to their analysis, in accordance with the relevant ESG Methodology.

H. Morningstar Sustainalytics adopts measures designed to ensure that the information it uses in issuing ESG Ratings is of sufficient quality and from reliable sources.

I. At least two full working days before the first issuance of an unsolicited ESG Rating, Morningstar Sustainalytics notifies the rated item entity during its working hours of the intention to issue an unsolicited ESG Rating, to give the rated item issuer an opportunity to inform Morningstar Sustainalytics of any factual errors. For this purpose, Morningstar Sustainalytics also makes available certain information related to the relevant unsolicited ESG Rating to the rated item entity upon request in accordance with applicable law.

J. Morningstar Sustainalytics allows rated item entities to provide post-issuance feedback on factual errors or data inaccuracies. Feedback is reviewed and corrections are made where appropriate.

K. Morningstar Sustainalytics does not conduct on-site reviews or visits to rated item entities for the purposes of providing its ESG Ratings.

L. Changes to Morningstar Sustainalytics' ESG Ratings are made only in accordance with its published ESG Methodologies. This occurs, at a minimum, following the modification of ESG Methodologies (in accordance with applicable policies and procedures) and in the event of material new information with respect to a rated item and/or a rated item entity.

M. Morningstar Sustainalytics reviews outstanding ESG Ratings on an ongoing basis in accordance with its policies and procedures.

N. Sustainalytics, B.V. may endorse ESG Ratings that are provided by Sustainalytics Canada in accordance with applicable law.

O. Morningstar Sustainalytics ensures that all Analytical Personnel directly involved in the provision of ESG Ratings possess the necessary knowledge and experience to perform their assigned duties and are subject to effective management and supervision.

P. Sustainalytics B.V. exercises oversight and accountability in relation to the ESG Ratings issued by Sustainalytics Canada and endorsed for use in the European Union.

Q. Sustainalytics B.V. ensures that all Analytical Personnel involved with monitoring endorsed ESG Ratings that are provided by Sustainalytics Canada and any associated risks have the necessary expertise