

Sustainable Investment Data Recalculation Policy and Guidelines

v1.2



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Sustainable Investment Data Recalculation Policy

Sustainable Investment Data Recalculation Policy

This document sets out FTSE Russell's Sustainable Investment (SI) Data Recalculation Process. This applies to FTSE Sustainable Investment Data Products listed in the

[Guide to FTSE and Third Party Sustainable Investment Data used in FTSE Russell Indices.pdf](#) (ftserussell.com).

FTSE Russell makes every effort to maintain its data and indices to high standards; nevertheless, inaccuracies may arise in the products from time to time and investors, index constituents, licensees or other market participants should be aware of this. Inaccuracies in FTSE Sustainable Investment data products may arise as a result of a range of events including: the process and complexities of capturing Sustainable Investment data from a wide variety of underlying data sources; the timings of when a company updates or releases such information; disagreement over whether a company meets a specific ESG indicator; the process of interacting with a company to capture feedback on their publicly disclosed information; entering company data into FTSE Russell systems; the result of automated calculation where applicable; and the provision of incorrect, incomplete or late data whether occurring internally or externally to FTSE Russell.

Where an inaccuracy in a FTSE Sustainable Investment data product is identified, FTSE Russell will follow the guidelines set out in this document when determining if this should be recalculated. These guidelines, however, should not be construed as definitive rules that determine the steps FTSE Russell will take whenever an inaccuracy is identified.

It is possible that circumstances, including external events beyond the control of FTSE Russell, may necessitate changes to, or the cessation of, a Sustainable Investment data product and therefore, any financial contracts or other financial instruments or investment funds that reference any Sustainable Investment data product should be able to withstand, or otherwise address the possibility of changes to, or cessation of, the product.

Sustainable Investment data product users should assess the merits of the relevant Sustainable Investment data product series' rules-based methodology and take independent investment advice before making investment decisions based on this data. Users should also be aware that Sustainable Investment data is based on evolving standards and can feature nuances in interpretation and analysis.

No liability whether as a result of negligence or otherwise is accepted by FTSE Russell for any losses, damages, claims and expenses suffered by any person as a result of:

- any reliance on these guidelines;
- any errors or inaccuracies in these guidelines;
- any non-application or misapplication of the policies or procedures described in these guidelines; and/or
- any errors or inaccuracies in the compilation of any Sustainable Investment data product or any constituent data.

Sustainable Investment data complaints process

Complaints

The FTSE Russell complaints procedure can be accessed using the following link:

[Benchmark_Determination_Complaints_Handling_Policy.pdf](#)

If a company wishes to challenge its Sustainable Data, it should contact FTSE4Good@FTSERussell.com; queries outside of this channel may be delayed or missed. The reasons for challenging Sustainable Data should be stated, have regard to the Sustainable Data Recalculation Guidelines, and any documentary evidence in support of the claim should be attached. In considering the claim, FTSE Russell may only take account of publicly available information available at the time of the Sustainable Data assessment.

When making its decision in line with Sustainable Investment Data Recalculation Guidelines and Policy, FTSE Russell will make reference to the data collection process outlined earlier in this document and the indicator guidance made available to analysts. FTSE Russell aims to ensure that the correct Sustainable Data collection processes have been followed and that the methodologies have been applied consistently across companies.

FTSE Russell will review the company's Sustainable Data based on its own analysis and evidence provided by or on behalf of the company, with reference to the Sustainable Data Recalculation Guidelines. If a Sustainable Data change is supported, it will be implemented at a subsequent quarterly data update. If a data update is not supported by FTSE Russell, the complainant will be informed of this outcome with the rationale for the decision.

Sustainable Investment Data Recalculation Guidelines

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Event type	Decision criteria	Sustainable investment data update
Challenge to the incorporation of company feedback	If FTSE Russell determines that the feedback process was not followed correctly and that updates to the sustainable investment data are required.	At the next quarterly update of sustainable investment data
Sustainable investment data miscalculation	Following investigation by FTSE Russell, it is found there was a miscalculation of sustainable investment data.	At the next quarterly update for sustainable investment data.
New information availability	Sustainable investment data takes into account publicly available information at the time of the assessment and not subsequent publications.	Information provided after the closing of the company feedback process will be considered at the next quarterly update of sustainable investment data.

Indices that use Sustainable Investment Data

FTSE Russell Sustainable Investment data products are used as inputs into sustainable investment indices and are listed on the FTSE Russell website and the relevant ground rules.

Further information about the FTSE Russell Equity Index Recalculation Policy can be accessed using the following link:

[Equity Index Recalculation Policy and Guidelines.pdf](#)

An update in Sustainable Investment data may impact Sustainable Investment equity index inclusion and will depend on the frequency of the index rebalance.

Further information

For further information on FTSE Russell Indexes, please visit www.lseg.com/en/ftse-russell/ or e-mail info@ftserussell.com.

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