Using Portfolio Analytics to Inform the Names Rule

Through Transparency into Fund Holdings

October 27, 2020



Agenda – SEC Names Rule Meeting

- MSCI Overview
- Factor Analytics
 - Introduction to portfolio analytics and industry usage
 - —How risk and return factors work
 - –Mutual funds through the lens of factors
 - -Are exposures consistent with mutual fund names?
 - -Case study: applying factors to inform the Names rule
- Environmental, Social, and Governance (ESG) Exposures



MSCI Overview



- MSCI ACWI Index
- MSCI World Index
- MSCI Emerging Markets Index
- Factor Indexes
- Thematic Indexes
- ESG Indexes
- Real Estate Indexes
- Custom Indexes

1040+ ETFs are based on MSCI indexes, more than any other index provider¹

200,000+Indexes calculated daily; 11,000+ in real time



ANALYTICS

- Risk Management (RM)
- Portfolio Construction (Barra)
- Investment Differentiation
- Regulatory Compliance
- Managed Services

MSCI Global Risk and Performance Engine runs up to 1 Trillion calcs/day

2 Million time series

17+ Million client positions

52 Global FI markets

1.300+ issuer curves



- MSCI ESG Ratings
- MSCI ESG Screening
- MSCI ESG Governance Metrics
- MSCI ESG Fund Metrics
- MSCI ESG Carbon Tools
- MSCI Sustainable Impact
- MSCI ESG Research

World's largest provider of Environmental, Social and Governance (ESG) data and research²

350+ dedicated full time staff globally to ESG business, including 185+ ESG research analysts³



REAL ESTATE

- Real Estate Performance
- Real Estate Research
- Private (Direct and Indirect)
- Public Equity

Global leader in Real Estate performance analysis and risk services

In over 30 markets worldwide

Analysis tools that can be applied to all types of Real Estate



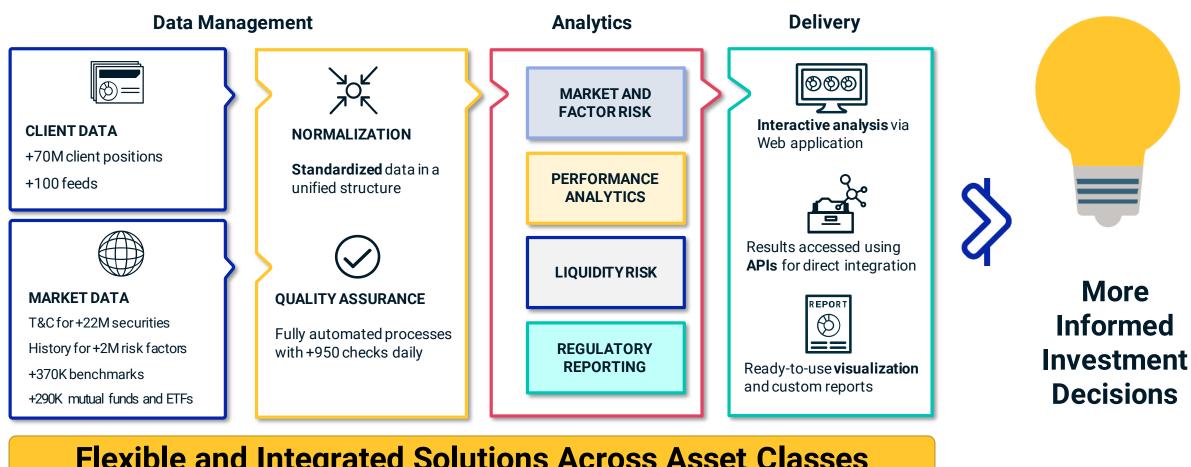
1As of September, 2018; defined as each share class of an exchange traded fund, as identified by a separate Bloomberg ticker. Only primary listings, and not crosslistings, are counted. 2By coverage and/or staff based on public information produced by Sustainalytics, EIRIS, Trucost, as of Aug 2015; 3MSCI ESG Research as of March 2019. Includes full time employees, employees of foreign affiliates providing investment advisory services to MSCI ESG Research LLC, and global allocated staff performing non-investment advisory tasks.

Factor Analytics



MSCI Analytics Support the Investment Process

Clients Build More Transparent and Better Portfolios Using MSCI Analytics

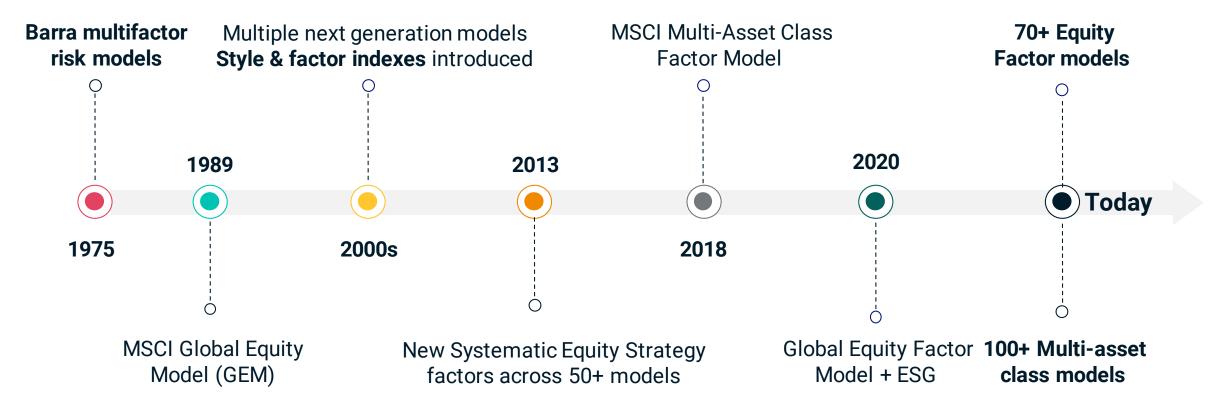


Flexible and Integrated Solutions Across Asset Classes



MSCI Portfolio Analytics and Factor Risk Models

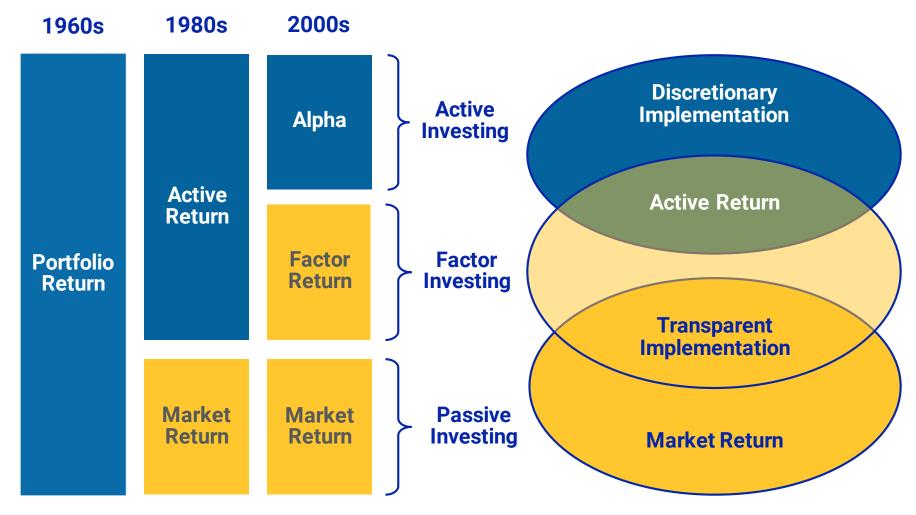
MSCI is a longstanding industry leader in indexes, portfolio and risk analytics, and ESG ratings and data. MSCI has developed Factor Risk Models in consultation with the world's largest investors that are backed by four decades of factor data research.



Our Factor Risk Models have evolved in tandem with the industry and have their roots in the academic literature



Institutional Investors Allocate to Factors



For a discussion of the role of factor investing in institutional portfolios, see "Power to the People: The Profound Impact of Factor Investing on Long Term Portfolio Management", Journal of Portfolio Management, Winter 2016



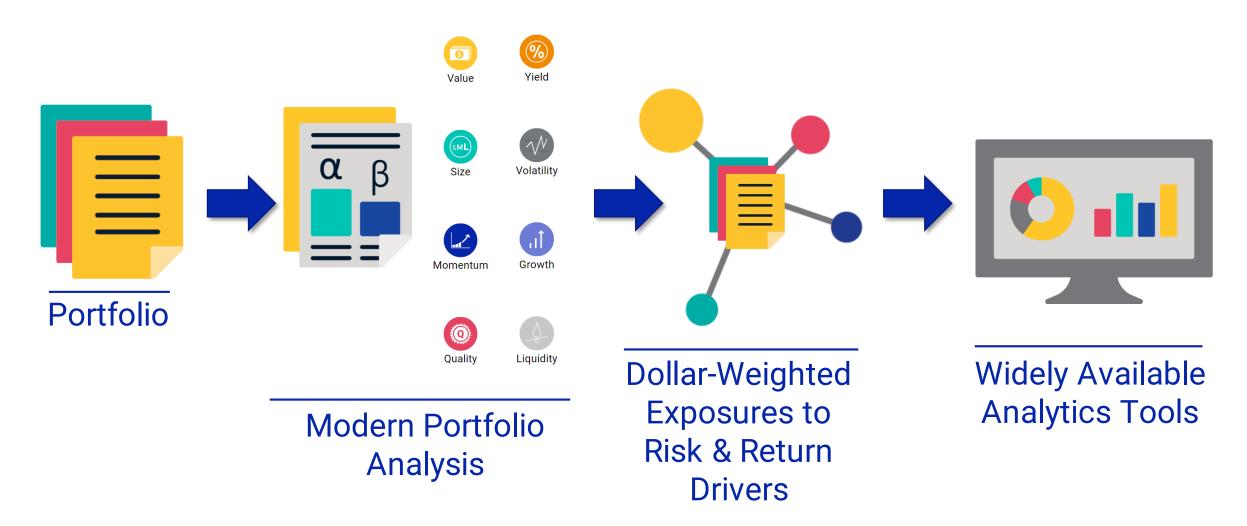
▼ Global Equity Factor Structure

- 8 Factor Groups, 16 Factors and 41 descriptors
- Based on MSCI's Barra Global Equity Total Market Model (GEMLT)

| \$ VALUE | SML | MOMENTUM | VOLATILITY | QUALITY | O/O YIELD | GROWTH | LIQUIDITY |
|-------------------|---------|----------|------------|---------------|-----------|--------|-----------|
| Book to | Size | Momentum | Beta | Leverage | Yield | Growth | Liquidity |
| Price | Mid Cap | | Residual | Profitability | | | |
| Earnings Yield | | | Volatility | Earnings | | | |
| Long Term | | | | Variability | | | |
| Reversal | | | | Earnings | | | |
| | | | | Quality | | | |
| | | | | Investment | | | |
| | | | | Quality | | | |



Investors Use Factor Analysis to Manage Portfolios





Calculating Portfolio Exposure to Factors: Quality

| Fund Portfolio | | | | | |
|-----------------------------|-------------------------------|---|-------------------------|---|----------------------|
| Asset Name | Quality Family Exposure | | Asset Weight | | Exposure x Weight |
| Exxon Mobil Corp | 0.56 | * | 7.7% | = | 0.04 |
| General Electric Co | -0.61 | * | 6.5% | = | -0.04 |
| Johnson & Johnson | 0.71 | * | 6.2% | = | 0.04 |
| Wells Fargo & Co New | -0.60 | * | 5.9% | = | -0.04 |
| Amazon Com Inc | -0.02 | * | 5.5% | = | 0.00 |
| Nestle | 0.38 | * | 5.5% | = | 0.02 |
| Jpmorgan Chase & Co | -0.62 | * | 5.3% | = | -0.03 |
| Google | 0.47 | * | 4.9% | = | 0.02 |
| Facebook Inc | -0.99 | * | 4.9% | = | -0.05 |
| Google Inc [A] | 0.36 | * | 4.7% | = | 0.02 |
| Pfizer Inc | 0.86 | * | 4.6% | = | 0.04 |
| Novartis Ag Rs | 0.53 | * | 4.6% | = | 0.02 |
| Procter & Gamble Co | 0.66 | * | 4.6% | = | 0.03 |
| At&T Inc | 0.49 | * | 4.6% | = | 0.02 |
| Roche Holdings Drc | 0.52 | * | 4.3% | = | 0.02 |
| Verizon Communications Inc | -0.43 | * | 4.3% | = | -0.02 |
| Walt Disney Co | 0.13 | * | 4.1% | = | 0.01 |
| Bank Of America Corporation | -1.11 | * | 3.9% | = | -0.04 |
| Coca Cola Co | 0.28 | * | 3.9% | = | 0.01 |
| Chevron Corp New | 0.56 | * | 3.8% | = | 0.02 |
| | | | Portfolio Exposure : | | Σ = 0.11 |

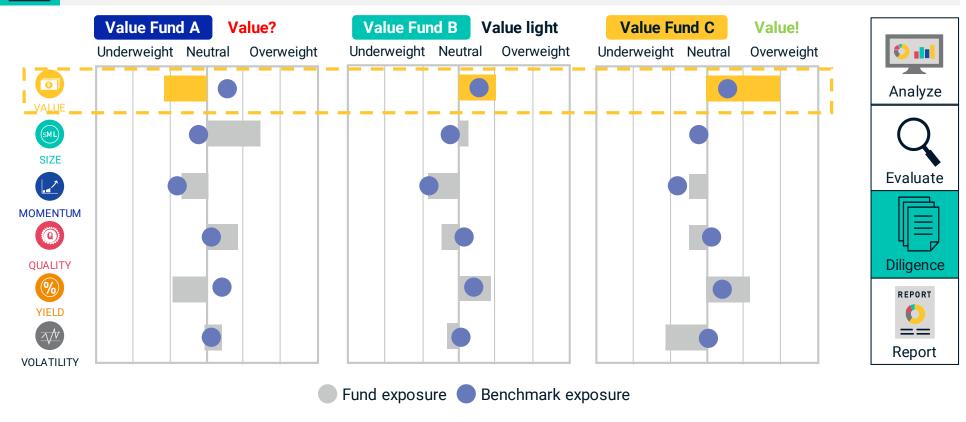
- Factor exposure is expressed as a cross sectional standard deviation (z-score)
- Factor exposures range from -3 to +3 for individual stocks
- Portfolio exposure to factors is calculated as the weighted average of stock exposures
- Typical active portfolios have about
 0.5 standard deviation exposure to the target factor
- Portfolio exposures greater than 0.2 standard deviation are deemed to be significant
- Company exposures are relative to the whole market



Does Your Fund do What it Says on the Tin?

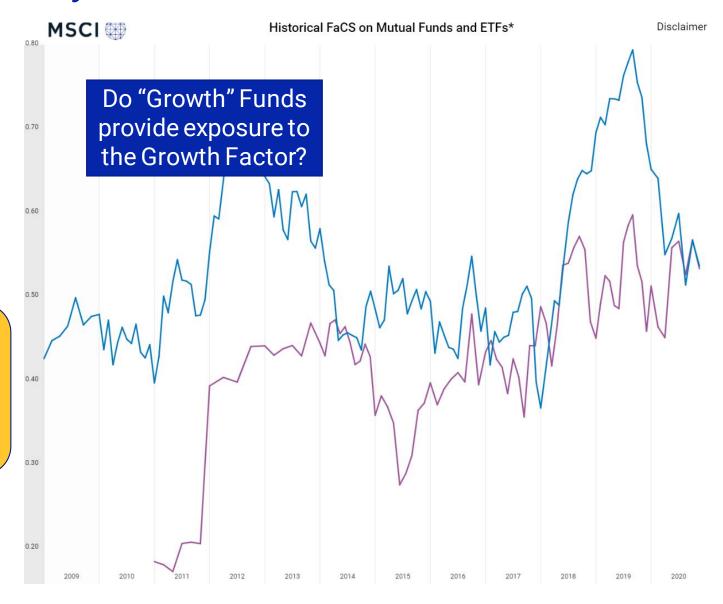
<u>ldi.</u>

Fund due diligence: MSCI FaCS provide an easy way to compare the exposure to funds with the same name or similar investment strategies





Historical Analysis – MSCI FaCS on Mutual Funds



In this example the "purple" Growth fund has consistently positive exposure to the growth factor



While the "blue" fund

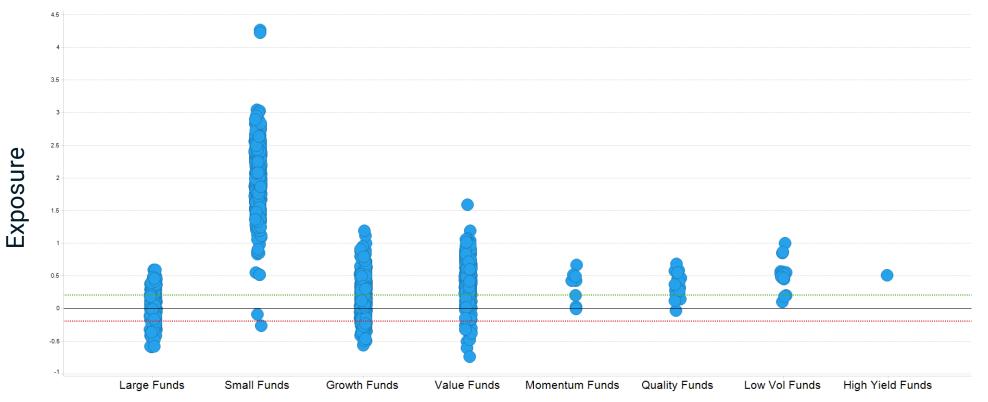
also named Growth

generally has higher

exposure to the

growth factor

Exposure of Mutual Funds with Type or Strategy in the Fund Name

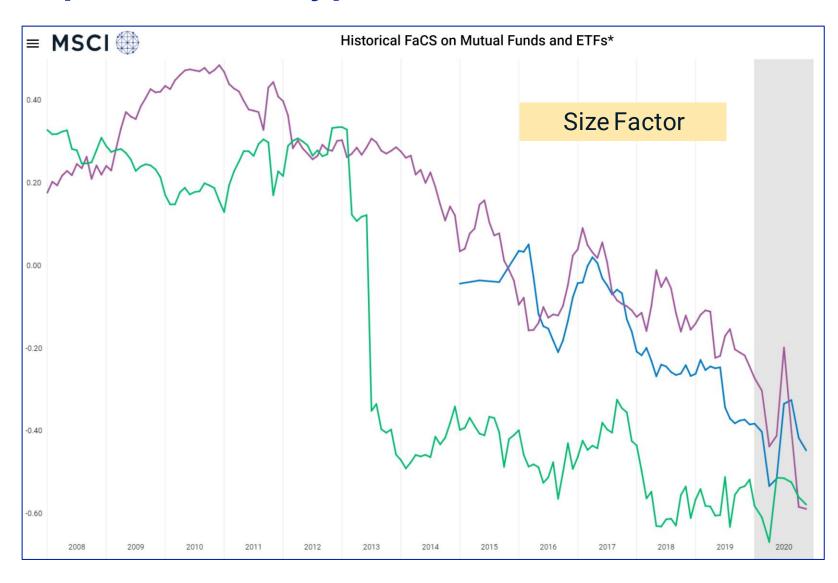


| Type or Strategy → | Large | Small | Growth | Value | Momentum | Quality | Low Vol | High Yield |
|---------------------------------|-------|-------|--------|-------|----------|---------|---------|------------|
| Number of funds | 178 | 482 | 560 | 413 | 8 | 21 | 16 | 1 |
| Number with exposure below 0 | 52 | 2 | 119 | 21 | 1 | 1 | 0 | 0 |
| % below 0 | 29% | 0% | 21% | 5% | 13% | 5% | 0% | 0% |
| Number with exposure below -0.2 | 20 | 1 | 37 | 12 | 0 | 0 | 0 | 0 |
| % below -0.2 | 11% | 0% | 7% | 3% | 0% | 0% | 0% | 0% |



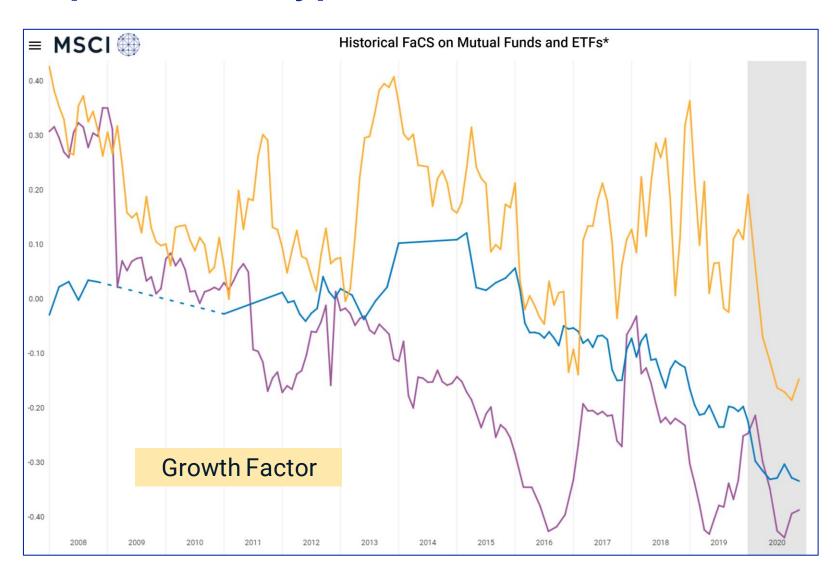
▼ Historical Size Exposures of Typical Outlier Funds

- Examples of three funds with "Large" in the name
- All three have negative exposure to the Size factor today
- Funds can change their exposures over time due to:
 - Changes in fund holdings
 - Changes in the fundamental characteristics of fund holdings





- Examples of three funds with "Growth" in the name
- All three have negative exposure to Growth today
- Funds can change their exposures over time due to:
 - Changes in fund holdings
 - Changes in the fundamental characteristics of fund holdings





Consistency of Fund Holdings with Fund Name – Size

"ABC Large Cap Value Fund"

| | Grouping: Tier 3 Equity Size Exp | Weight (%) | Asset ID |
|---|-------------------------------------|------------|----------|
| | by: PosNeg_sinnreid | 100.00% | 64 |
| | + Positive | 31.05% | 18 |
| | <u>Negative</u> ■ | 68.95% | 46 |
| 4 | > | 4 | |

| Grouping: Tier 3 Equity Size Exp | Asset Name | Weight (%) | Tier 3 Equity Size Exp ▼ |
|-------------------------------------|------------------------------|------------|-----------------------------|
| by: PosNeg_sinnreid | | 100.00% | -0.41 |
| □ <u>Positive</u> | | 31.05% | 0.76 |
| | PROCTER & GAMBLE CO | 2.51% | 1.15 |
| | BERKSHIRE HATHAWAY INC | 3.23% | 1.14 |
| | JPMORGAN CHASE & CO | 2.21% | 1.13 |
| | ALPHABET INC | 0.69% | 1.12 |
| | FACEBOOK INC | 1.71% | 1.12 |
| | VISA INC | 1.02% | 1.11 |
| | MICROSOFT CORP | 1.88% | 1.11 |
| | INTEL CORP | 1.51% | 0.95 |
| | BANK OF AMERICA CORPORATION | 1.96% | 0.87 |
| | AT&T INC | 1.88% | 0.85 |
| | PEPSICO INC | 1.81% | 0.84 |
| | EXXON MOBIL CORPORATION | 0.59% | 0.64 |
| | AMERICAN TOWER CORP | 1.27% | 0.41 |
| | CITIGROUP INC | 1.83% | 0.30 |
| | TARGET CORP | 2.73% | 0.21 |
| ■ <u>Negative</u> | | 68.95% | -0.93 |
| | SELECT MEDICAL HOLDINGS CORP | 1.33% | -2.12 |
| | MANPOWERGROUP INC | 1.37% | -1.90 |
| | HUNTSMAN CORP | 1.83% | -1.74 |
| | OSHKOSH CORP | 1.54% | -1.73 |
| | FLOWERS FOODS INC | 0.79% | -1.71 |
| | HILL-ROM HOLDINGS INC | 1.47% | -1.66 |
| | LPL FINANCIAL HOLDINGS INC | 1.32% | -1.61 |
| | LAMAR ADVERTISING CO | 1.26% | -1.60 |
| | ENCOMPASS HEALTH CORPORATION | 1.38% | -1.57 |
| | STEEL DYNAMICS INC | 1.70% | -1.56 |
| | AECOM | 1.73% | -1.52 |
| | AMEDISYS INC | 1.91% | -1.42 |
| | QUANTA SERVICES INC | 2.48% | -1.42 |
| | CARLYLE GROUP INC | 1.46% | -1.31 |
| | VISTRA CORP | 1.42% | -1.31 |

- Actual mutual fund with "Large Cap Value Fund" in the name
- Fund's exposure to Size is -.41
- Only 31% of this fund's holdings by weight have a positive exposure to Size
- 69% by weight have a zero or negative exposure to Size

Only top 15 positive and negative Size exposure holdings shown



Consistency of Fund Holdings with Fund Name – Growth

"ABC Large Growth Fund"

| | Grouping: Tier 3 Equity Growth Exp | Weight (%) | Asset ID |
|---|--------------------------------------|------------|----------|
| | by: Pos-Neg Growth Exposure_sinnreid | 100.00% | 50 |
| | + Positive | 14.78% | 7 |
| | <u>Negative</u> | 85.22% | 43 |
| 4 | <u> </u> | 4 | |

| Grouping: Tier 3 Equity Growth Exp | Asset Name | Weight (%) | Tier 3 Equity Growth Exp ▼ |
|------------------------------------|--------------------------------------|------------|-------------------------------|
| by: Pos-Neg Growth Exposure_sinn | | 100.00% | -0.28 |
| □ Positive | | 14.78% | 0.30 |
| | PIONEER NATURAL RESOURCES CO | 1.29% | 1.05 |
| | EOG RESOURCES INC | 1.04% | 0.78 |
| | D.R. HORTON INC | 2.46% | 0.37 |
| | PULTEGROUP INC | 2.04% | 0.36 |
| | PROGRESSIVE CORP | 2.24% | 0.25 |
| | UNITED RENTALS INC | 2.67% | 0.02 |
| | TRACTOR SUPPLY CO | 3.04% | 0.02 |
| □ <u>Negative</u> | | 85.22% | -0.39 |
| | AMERICAN AIRLINES GROUP | 1.00% | -1.70 |
| | UNITED AIRLINES HOLDINGS INC | 0.90% | -1.29 |
| | DELTA AIR LINES INC | 1.15% | -0.97 |
| | LAS VEGAS SANDS CORP | 1.40% | -0.93 |
| | INTERNATIONAL BUSINESS MACHINES CORP | 1.65% | -0.91 |
| | OMNICOM GROUP INC | 1.32% | -0.82 |
| | SOUTHWEST AIRLINES CO | 1.48% | -0.79 |
| | EMERSON ELECTRIC CO | 1.96% | -0.66 |
| | GENERAL MILLS INC | 2.20% | -0.66 |
| | HENRY SCHEIN INC | 1.83% | -0.59 |
| | 3М СО | 2.16% | -0.57 |
| | CISCO SYSTEMS INC | 1.74% | -0.56 |
| | PACCAR INC | 2.38% | -0.55 |
| | WALMART INC | 2.35% | -0.54 |
| | WESTERN UNION CO | 1.70% | -0.52 |
| | AMGEN INC | 2.07% | -0.46 |
| | BIOGEN INC | 1.61% | -0.44 |
| | GENERAL DYNAMICS CORP | 1.52% | -0.44 |
| | ORACLE CORP | 2.20% | -0.40 |
| | NETAPP INC | 1.79% | -0.37 |

- Actual mutual fund with "Large Cap Growth Fund" in the name
- Fund's exposure to Growth is -.28
- Only 15% of this fund's holdings have a positive exposure to Growth
- 85% have a negative exposure to Growth

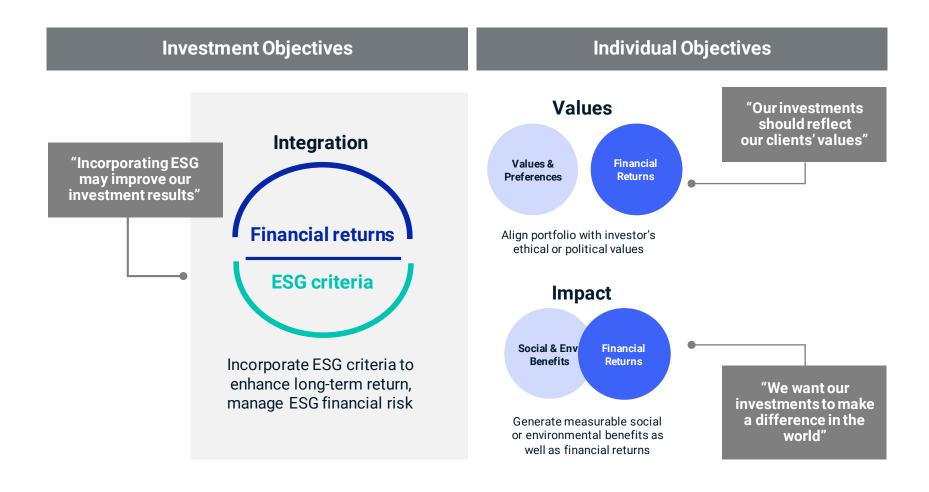
Only top 20 negative Growth exposure holdings shown



Environmental, Social, and Governance (ESG) Exposures



► No "One Size Fits All" – Different Objectives





► No "One Size Fits All" – Dimensions of ESG Exposure



ESG Fund Rating / Quality Score

Weighted average ESG score of fund holdings



ESG Momentum

Positive / negative ESG trend as % of holdings



ESG Laggards

ESG laggards (B, CCC) as % of holdings



Headline ESG Risk

Very severe ESG controversies (%)



Carbon Intensity

Carbon intensity of fund holdings (t CO2e / \$m sales)



SRI Exposure

Exposure to controversial business activities (%)



Sustainable Impact Exposure

Revenue exposure (%) to sustainable impact solutions



*Source: MSCI ESG Research

Over 200 Metrics, Including:

Sustainable impact

Overall

Sustainable Impact Themes (%)

Environmental

- Clean Tech Companies (%)
- Alternative Energy (%)
- Energy Efficiency (%)
- Green Building (%)
- Pollution Prevention (%)
- Sustainable Water (%)

Social

- · Social Impact Companies (%)
- Affordable Housing (%)
- · Education Services (%)
- · Nutritious Food (%)
- Health Care (%)
- Sanitation Products (%)
- Social Finance (%)

Values alignment

Controversies

- Severe Env. Controversies (%)
- Severe Labor Controversies (%)
- Severe Customer Controversies (%)
- Severe Human Rights and Community Controversies (%)
- Severe Governance Controversies (%)

International Norms Standards

- UN Global Compact Compliance Violation (%)
- UN Global Compact Compliance Watch List (%)
- Human Rights Norms Violation (%)
- Human Rights Norms Watch List (%)
- Labor Norms Violation (%)
- Labor Norms Watch List(%)

Business Involvement

- Catholic Values Flag (%)
- Islamic Values Flag (%)
- SRI Exclusion Criteria (%)
- Adult Entertainment (%)
- Alcohol (%)
- Gambling (%)
- Genetic Engineering GMO
 (%)
- Nuclear Power (%)
- Predatory Lending (%)
- Tobacco (%)
- · Controversial Weapons (%)
- Weapons (%)

Risk exposure

Scores & Ranking

- ESG Quality Score (0-10)
- Peer Group Percentile Rank (1-100)
- Global Percentile Rank (1-100)
- Environmental Quality Score (0-10)
- Social Quality Score (0-10)
- Governance Quality Score (0-10)
- · Rating Distribution & Trend

Environmental Risks

- Carbon Footprint
- Fossil Fuel Reserves (%)
- Water Exposure (%)

Governance Risks

- Board Flag (%)
- Board Independence (%)
- No Female Directors (%)
- Pay Flag (%)
- Ownership & Control Flag (%)
- Accounting Flag (%)



Fund Coverage Universe

Multi-asset class funds covered globally





By Asset Class

| | Fund Portfolios | Share Classes |
|--------------|--------------------|------------------|
| Equity | 18,813 | 71,123 |
| Bond | 7,387 | 33,567 |
| Mixed Assets | 3,856 | 13,487 |
| Money Market | 579 | 2,264 |
| Alternatives | 495 | 2,628 |
| Commodity | 75 | 414 |
| Real Estate | 40 | 175 |
| Other | 102 | 130 |

By Asset Universe

| | Fund Portfolios | Share Classes |
|-----------------------|--------------------|------------------|
| Mutual Funds | 24,779 | 111,656 |
| Insurance Funds | 1,639 | 4,833 |
| Exchange Traded Funds | 3,852 | 5,034 |
| Pension Funds | 691 | 1,823 |
| Closed End Funds | 262 | 276 |
| Investment Trust | 106 | 111 |
| Hedge Funds | 18 | 54 |

By Region (Domicile)

| | Fund Portfolios | Share Classes |
|---------------------|--------------------|------------------|
| Luxembourg | 5,108 | 40,521 |
| USA | 7,395 | 20,081 |
| Canada | 2,399 | 16,154 |
| Ireland | 1,694 | 9,609 |
| UK | 1,815 | 8,788 |
| India | 806 | 3,795 |
| Korea (Republic of) | 666 | 3,285 |
| France | 1,152 | 3,032 |
| Sw itzerland | 697 | 2,058 |
| Japan | 2,041 | 2,041 |
| Other | 7,574 | 14,424 |

Coverage Criteria

MSCI ESG Fund Ratingsholdingsdata is sourced from Lipper. To be included in MSCI ESG Fund Ratings coverage universe, a fund must pass the following three criteria:

- 1. 65% of the fund's gross weight must come from covered securities.
- Fund holdings date must be less than one
- Fund must have at least ten securities.



Appendix



Evolution of Factor Models in Industry & Academics

1992

Fama & French expanded on the Rational Market Theory to demonstrate that company size and valuation factors are drivers of stock price

1993

Jegadeesh & Titman publish first research on momentum factor

2018

Launched MSCI Multi-Asset Class Factor Model (MSCI MAC Factor Model) a multi-tiered model that helps analyze key portfolio exposures across asset classes

1972

Haugen & Heins refining CAPM to create low volatility factor investing, demonstrated that stock portfolios with lower volatility tend to produce higher returns on average

Mid 1990s

First true integrated multiasset class factor model

2013

New **Systematic Equity Strategy factors** across
60+ models

2018

MSCI **FactorLab** was developed to provide the latest factor innovations outside of MSCI standard models

4.0

1975 Barra launch

Creation of the multifactor Barra risk models

First generation MSCI Global Equity Model (GEM) launched

GEM model 1st Gen

1989

1997

Carhart expanded on Fama-French-three-factor to include momentum factor, creating the Carhart fourfactor model

2008

Launched MSCI Global
Minimum Volatility indices,
global benchmark offering
managed volatility investment
strategies

2018

MSCI Launched FaCS and Factor Box

An industry standard and factor classification for consistent implementation and measurement of factor investing

1976

Stephen Ross introduced the Arbitrage Pricing Theory (APT) Rosenberg & Marathe Academic Asset Pricing Literature and Practitioner risk factor modeling research

. 1986

Chen, Ross, Roll suggested that macroeconomic factors can systematically affect stock market returns

2000-2010

Multiple next generation models



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