State Street Global Advisors’ Approach to ESG Screening

At State Street Global Advisors, we aim to help our clients achieve their goals, which could include social progress or risk mitigation. Our capabilities in environmental, social, and governance (ESG) investing help us to generate long-term value for our clients.

ESG screening involves excluding specific companies, industries, or countries from an investment portfolio based on ESG factors or risks. ESG screening can be applied to portfolios as a standalone approach, or in combination with other styles, such as thematic investing or integrating ESG into the investment process. While screening may sound relatively simple, the process involves a significant amount of judgment on the part of asset managers or the third party data providers with whom they partner to conduct this screening.

Investors who seek screened portfolios often express their desire for screening as a topic area — for example, seeking to screen tobacco from a portfolio. Yet there are a variety of ways that a company might be involved in tobacco: for example, as a manufacturer, licensor, or retailer. Additionally, there are multiple potential thresholds for what it means to be “involved” in tobacco. Should a business that derives 1% of revenue from tobacco-related products count as involved? What about a business that is a significant owner of a tobacco manufacturer, but does not conduct activities directly?

These questions highlight the challenges of defining involvement in screened products or industries. At State Street Global Advisors, we believe it important to offer our clients our own perspective on how to conduct ESG screening, and to approach this process with the same rigor that guides all of our work. In light of this, we have developed a recommended approach to applying ESG screens to investment portfolios. This approach represents the shared perspectives of our investment teams across active and index investment styles in equity, fixed income, and alternatives.

Below, we set forth the principles that guide our approach, a framework for understanding product involvement, our method for incorporating perspectives from multiple data providers, and our initial focus areas and applications.
### Guiding Principles

Our approach is guided by the following principles:

1. **Systematic and transparent approach**  We follow a well-defined methodology that can be flexibly applied to different use cases.

2. **Leverage best-in-class available data**  We use inputs from multiple data providers where accessible to us. This broadens our overall coverage universe, and reduces the potential biases of a single data provider.

3. **Awareness of impact on risk and return objectives**  Our point of view is attentive to the impact of excluded securities on a broader set of investment considerations.

4. **Strive for consistency while accommodating for differences**  Deviations from this approach are made where appropriate to adapt to investment styles, national legislation, and/or market-specific norms prevalent in certain regions. This allows us to offer our clients both a defined perspective, and investment solutions most appropriate to their contexts.

### Defining Involvement in Screened Industry, Product, or Topic

Given the complexities in defining product involvement articulated above, screening involves judgment on the part of investors. At State Street Global Advisors, we draw on the following framework to guide how we define product involvement.

There are two core elements to the framework: the drivers of product involvement, and the scope of a resulting restricted list of securities.

**Drivers of product involvement** might be described in terms of 1) revenue thresholds, 2) activities or 3) significant ownership relationship with a company. We describe these in more detail below. Due to the nature of ESG data, different data providers describe product involvement differently; for example, some use revenue thresholds, while others use binary metrics indicating whether a company is involved in the production of a product.

**The scope of a restricted list** can be thought of as how extensively a given topic is screened — or, put differently, the length of the resulting list of restricted securities. A focused list will be comprised of companies with more direct involvement in the product; a broader list will include companies with involvement farther up or down the value chain, or for whom involvement comprises a smaller part of their overall business.

<table>
<thead>
<tr>
<th>3 Drivers of Product Involvement</th>
<th>Description</th>
<th>Focused Involvement</th>
<th>Broad Involvement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1 Revenue</strong></td>
<td>What percent of a company’s total revenue is derived from this industry, product, or topic?</td>
<td>Higher revenue threshold</td>
<td>Lower revenue threshold</td>
</tr>
<tr>
<td><strong>2 Activities</strong></td>
<td>What part of the value chain is the company involved in?</td>
<td>Direct involvement in the product</td>
<td>Direct and/or indirect involvement in the product</td>
</tr>
<tr>
<td><strong>3 Significant Ownership</strong></td>
<td>Is the company an owner of, or owned by, another company with involvement in this issue?</td>
<td>Companies that are majority owned, invested in, or owned by companies with involvement in the product in question are screened</td>
<td>Companies with any ownership relationship to the product in question are screened</td>
</tr>
</tbody>
</table>
Combining Data Providers + Producing a Final List

Where available, our approach generates focused lists of restricted securities from two leading providers of ESG screening data: MSCI and Sustainalytics. We apply the more focused list with the intention of concentrating our restricted securities on those issuers with meaningful involvement in the product, issue, or topic in question, rather than more tertiary involvement. Our intention is not to screen every issuer that touches the topic in question in any way, but to screen those with notable involvement. This allows us to balance screening preferences with other investment considerations.

We then combine the lists of restricted securities; any issuer that is screened out by either data provider will be screened by our final list. We do this because methodologies and universes of different ESG data providers vary. By combining the lists of each provider, we are able to provide more comprehensive coverage for our clients. Lists are updated on a quarterly basis.

While this represents our recommended approach, the framework outlined above allows for flexibility and customization to address specific client needs or preferences.

Focus Areas and Applications

This approach is applied in a variety of ESG funds managed by State Street Global Advisors. The resulting restricted lists are also available for use by clients in separately managed accounts.

We have applied the guiding principles and product involvement framework to fourteen ESG topic areas which are commonly screened by our clients. They are:

- Adult Entertainment
- Alcohol
- Arctic Drilling
- Cannabis
- Civilian Firearms
- Controversial Weapons
- Extreme ESG Controversies
- Gambling
- Oil & Gas
- Oil Sands
- Shale Energy
- Tobacco
- Thermal Coal
- UN Global Compact Violators

We continue to explore screening topics that are relevant to a significant set of our clients globally, and expect to apply our approach to a broader set of screening topics over time.
Conclusion

As we continue to expand our ESG capabilities and offerings, we look forward to partnering with clients to implement this approach to screening in portfolios. For more information, please contact your State Street Global Advisors relationship manager.

Contacts

Stefano Maffina  
Senior ESG Research and Data Analyst  
Stefano_maffina@ssga.com

Sakshi Borikar  
ESG Analyst  
sakshi_borkiar@ssga.com

Endnote

1 We use two sources of data where accessible to us.
**About State Street Global Advisors**

For four decades, State Street Global Advisors has served the world’s governments, institutions and financial advisors. With a rigorous, risk-aware approach built on research, analysis and market-tested experience, we build from a breadth of index and active strategies to create cost-effective solutions. As stewards, we help portfolio companies see that what is fair for people and sustainable for the planet can deliver long-term performance. And, as pioneers in index, ETF, and ESG investing, we are always inventing new ways to invest. As a result, we have become the world’s fourth-largest asset manager* with US $3.26 trillion* under our care.

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*Pensions & Investments Research Center, as of December 31, 2021.

* This figure is presented as of September 30, 2022 and includes approximately $55.12 billion USD of assets with respect to SPDR products for which State Street Global Advisors Funds Distributors, LLC (SSGA FD) acts solely as the marketing agent. SSGA FD and State Street Global Advisors are affiliated. Please note all AUM is unaudited.

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**APAC**

**Australia**: State Street Global Advisors, Australia, Limited (ABN 42 003 914 225) is the holder of an Australian Financial Services Licence (AFSL Number 238276). Registered office: Level 14, 420 George Street, Sydney, NSW 2000, Australia. T: +61 2 9240-7600. F: +61 2 9240-7611.

**Hong Kong**: State Street Global Advisors (Asia Limited, EDF, Two International Finance Centre, B Finance Street Central, Hong Kong, T: +852 2103-0200. F: +852 2103-0288.


**EMEA**


**Belgium**: State Street Global Advisors Belgium, Chaussee de La Hulpe 105, 1170 Brussels, Belgium. T: +32 2 663 2036. State Street Global Advisors Belgium is a branch office of State Street Global Advisors Europe Limited, registered in Ireland with company number 49394, authorised and regulated by the Central Bank of Ireland, and whose registered office is at 78 Sir John Rogerson’s Quay, Dublin 2.

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**Germany**: State Street Global Advisors Europe Limited, Branch in Germany, Brienner Strasse 59, D-80333 Munich, Germany ("State Street Global Advisors Germany"). T: +49 (0) 89 65678-400. State Street Global Advisors Germany is a branch of State Street Global Advisors Europe Limited, registered in Ireland with company number 49394, authorised and regulated by the Central Bank of Ireland, and whose registered office is at 78 Sir John Rogerson’s Quay, Dublin 2.

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**Netherlands**: State Street Global Advisors Netherlands, Apollo Building, 7th floor, Herikerbergweg 29, 1010 CN Amsterdam, Netherlands. T: +31 20 781 000. State Street Global Advisors Netherlands is a branch office of State Street Global Advisors Europe Limited, registered in Ireland with company number 49394, authorised and regulated by the Central Bank of Ireland, and whose registered office is at 78 Sir John Rogerson’s Quay, Dublin 2.

**Switzerland**: State Street Global Advisors AG, Beethovenstr. 18, CH-8027 Zurich. Registered with the Register of Commerce Zurich CHE- 106074858. T: +41 (0) 44 245 70 00. F: +41 (0) 44 245 70 18.


**North America**


**United States**: State Street Global Advisors, 1 Iron Street, Boston, MA 02210-1641. T: +1 617 786 3000.

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The returns on a portfolio of securities which exclude companies that do not meet the portfolio’s specified ESG criteria may trail the returns on a portfolio of securities which include such companies. A portfolio’s ESG criteria may result in the portfolio investing in industry sectors or securities which underperform the market as a whole.

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