

# State Street USD Liquidity LVNAV Fund

## Website disclosure for an Article 8 fund



### A. Résumé

Le Compartiment State Street USD Liquidity LVNAV Fund (le « **Compartiment** ») applique une politique d'investissement qui consiste à combiner une approche d'investissement basée sur la valeur relative avec une analyse de la qualité de crédit afin d'identifier les titres qu'il estime à même d'assurer une stabilité maximale du capital et la plus haute probabilité de remboursement, conformément à son objectif d'investissement. Pour mettre en œuvre cette stratégie, le Gestionnaire d'investissement adopte une approche « Best in class » des considérations ESG et applique les filtres ESG négatifs et basés sur des normes.

Le Compartiment promeut des caractéristiques environnementales ou sociales ; il tâchera, bien que son objectif ne porte pas sur l'investissement durable, d'investir la majeure partie de son portefeuille dans les investissements durables visés à l'article 2(17) du SFDR au moyen de la méthodologie d'évaluation exclusive du Gestionnaire d'investissement et, concernant les émissions d'État et supranationales, classés dans les deux catégories les plus élevées de la notation ESG attribuée par une tierce partie.

Le Compartiment vise à promouvoir les caractéristiques environnementales et sociales suivantes : (i) investir la majorité de ses actifs nets dans des investissements durables en tâchant d'identifier les émetteurs jugés plus performants en ce qui touche aux enjeux ESG financièrement significatifs auxquels le secteur d'activité de l'émetteur est confronté, en s'appuyant sur le score ESG exclusif du Gestionnaire d'investissement et la notation ESG d'une tierce partie pour les émissions d'État et supranationales, et (ii) éviter les placements dans des émetteurs réputés contrevenir aux principes du Pacte mondial des Nations unies (« **PMNU** ») ou impliqués dans les armes controversées, le charbon thermique, le forage en Arctique, le pétrole et les sables bitumineux, ainsi que dans de graves controverses ESG. Les émetteurs que le Gestionnaire d'investissement juge ne pas contrevenir aux principes du PMNU sont considérés faire preuve de bonne gouvernance.

Pour le compte du Compartiment, le Gestionnaire d'investissement combine une approche d'investissement basée sur la valeur relative avec une analyse de la qualité de crédit afin d'identifier les titres qu'il estime à même d'assurer une stabilité maximale du capital et la plus haute probabilité de remboursement, conformément à l'objectif d'investissement du Compartiment. Pour mettre en œuvre cette stratégie, le Gestionnaire d'investissement adopte une approche « Best in class » des considérations ESG en tâchant d'investir la majeure partie du portefeuille du Compartiment dans des titres classés comme investissements durables visés à l'article 2(17) du SFDR au moyen de la méthodologie d'évaluation exclusive du Gestionnaire d'investissement et, concernant les émissions d'État et supranationales, classés dans les deux catégories les plus élevées de la notation ESG attribuée par une tierce partie. En outre, le Gestionnaire d'investissement applique le filtre ESG négatif basé sur des normes, avant de construire le portefeuille du Compartiment puis de manière continue.

Le Gestionnaire d'investissement emploie une méthodologie ESG contraignante qui vise à construire un portefeuille pour lequel au minimum 90 % des actifs du Compartiment sont investis dans des titres qui sont alignés sur les caractéristiques environnementales et sociales promues par ce dernier. Il est prévu que, sur cette proportion du portefeuille, au moins 51% des actifs du Compartiment soient placés dans des investissements durables. La partie restante (<10 %) du portefeuille, composée de trésorerie ainsi que d'équivalents de trésorerie détenus à la discrétion du Gestionnaire d'investissement, ne sera pas alignée sur les caractéristiques environnementales et sociales promues par le Compartiment.

Le Compartiment ne s'est pas engagé à réaliser des investissements durables au sens du Règlement Taxinomie.

La réalisation des caractéristiques environnementales et sociales est mesurée par le coefficient d'allocation du portefeuille aux investissements durables (qui sera au minimum de 51 %) et aux titres qui se situent dans les deux catégories les plus élevées de la notation ESG attribuée par une tierce partie. Cette mesure est affinée via le calcul du pourcentage du portefeuille investi dans des titres retenus après application du filtre négatif et basé sur des normes.

Les investissements durables réalisés par le Compartiment sont investis dans des titres catégorisés « Leaders » ou « Outperformers » d'après le score ESG généré par le système de notation ESG exclusif du Gestionnaire d'investissement. Concernant les émissions d'État et supranationales, le Gestionnaire d'investissement utilisera la notation ESG d'une tierce partie pour sélectionner les émetteurs classés dans les deux catégories les plus élevées.

Le Compartiment utilise les sources de données suivantes :

- Le système de notation ESG exclusif du Gestionnaire d'investissement, pour les investissements durables
- Sustainalytics, pour la notation ESG par une tierce partie des émetteurs gouvernementaux et supranationaux
- MSCI et Sustainalytics, pour les filtres ESG

Concernant les fournisseurs de données ESG, SSGA applique une procédure de diligence raisonnable permanente pour obtenir un suivi régulier de la qualité des données et peut intervenir auprès des fournisseurs concernés pour toute problématique identifiée par les équipes de SSGA.

Les données ESG peuvent être basées sur certaines hypothèses, prévisions, projections, perspectives et opinions, lesquelles s'appuient le cas échéant sur les tendances actuelles du marché ou sur les événements futurs anticipés. Étant donné la nature évolutive et innovante des modèles de données, des méthodologies et des hypothèses, ainsi que l'incertitude inhérente à la prédiction d'événements prospectifs, il ne peut être garanti que les données ESG soient toujours exactes ou correctes ni que les données ESG répondent aux objectifs ou aux exigences de quelque client ou investisseur donné qu'il soit. De plus, il se peut que des données ne puissent être obtenues en raison du manque de disponibilité des sources.

Les politiques d'engagement de SSGA ne sont pas directement intégrées dans la stratégie d'investissement du Compartiment. Cependant, le Programme d'engagement actionnarial de SSGA consolide l'ensemble des activités de vote et d'engagement, toutes classes d'actifs confondues, indépendamment de la stratégie d'investissement ou de la région géographique, y compris pour le Compartiment.

**Pour plus d'informations et de détails, veuillez vous référer aux sections pertinentes ci-dessous, au Prospectus et au Supplément correspondant.**



## B. No sustainable investment objective

The Fund promotes environmental or social characteristics and while it does not have as its objective a sustainable investment, it will seek to invest the majority of its portfolio in sustainable investments under article 2(17) of SFDR using the Investment Manager's proprietary assessment methodology and, for government and supra-national issuers, classified within the two highest categories of a third party ESG rating.

Additionally, the Investment Manager will screen out securities of issuers identified as being non-compliant with UNGC Principles relating to environmental protection, human rights, labour standards and anti-corruption, as well as controversial weapons and the issuers involved in thermal coal, arctic drilling, oil and tar sands, as well as severe ESG controversies. By

applying the relevant negative and norms-based screen, the Investment Manager deems the Fund's sustainable investments not to cause significant harm to any environmental or social sustainable investment objective.

The Fund pursues a reduction of negative externalities caused by the underlying investments and in that context considers principal adverse impacts ("PAI") on sustainability factors as part of the consideration of sustainable investments to be held by the Fund and by applying the negative and norms-based ESG screen prior to the construction of the portfolio.

Specifically, the Fund considers:

- Greenhouse Gas emissions
- Carbon footprint
- Greenhouse gas intensity of investee companies
- Exposure to companies active in the fossil fuel sector
- Share of non-renewable energy consumption and production
- Energy consumption intensity per high impact climate sector
- Activities negatively affecting biodiversity-sensitive areas
- Emissions to water
- Hazardous waste and radioactive waste ratio
- Violations of UN Global Compact Principles
- Unadjusted gender pay gap
- Board gender diversity
- Exposure to controversial weapons

The Fund excludes companies that the Investment Manager has deemed to violate UNGC principles as part of the negative screening utilised by the Fund. The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are considered as part of the UNGC principles assessment.



## C. Environmental or social characteristics of the financial product

The Fund seeks to promote the following environmental and social characteristics:

- Investment of the majority of the Fund's net assets in sustainable investments;
- The Investment Manager seeks to identify the issuers deemed to perform better as it relates to financially material ESG challenges facing the issuer's industry;
- Avoidance of investment in issuers which show an involvement in activities which are deemed non-compliant with the Investment Manager's ESG criteria such as violations of UNGC Principles or involvement in controversial weapons; and
- Exclusion of issuers involved in thermal coal, arctic drilling, oil and tar sands, as well as severe ESG controversies.

For the purposes of attaining the environmental and social characteristics promoted by the Fund, the Investment Manager considers the ESG characteristics of individual securities using a proprietary ESG score to adopt a best in class approach by seeking to invest the majority of the Fund's portfolio in securities that are classified as sustainable investments and, for government and supra-national issuers, are within the two highest categories using a third party ESG rating. In addition to this, a negative and norms-based screen is applied to screen out securities based on an assessment of their adherence to certain ESG criteria listed above. The Fund may use additional ESG screens from time to time in order to exclude securities based on their involvement with an activity that is deemed non-compliant with one or more of such ESG criteria.

For further details of the exclusions applied by the Investment Manager at any time please refer to Section G below.



## D. Investment Strategy

The Investment Manager, on behalf of the Fund, combines a relative value approach to investing with credit quality analysis to identify securities that it believes will provide the greatest stability of capital and the highest probability of repayment, consistent with the Fund's investment objective.

In implementing this strategy, the Investment Manager adopts a best in class approach to ESG considerations by seeking to invest the majority of the Fund's portfolio in securities that are classified as sustainable investments and, for government and supra-national issuers, classified within the two highest categories of a third party ESG rating.

In addition, the Investment Manager applies the negative and norms-based ESG screen prior to the construction of the portfolio of the Fund and on an ongoing basis.

Application of the ESG screens results in the exclusion of any securities from the portfolio based on an assessment of their adherence to certain ESG criteria defined by the Investment Manager. The Fund will screen out securities identified as being non-compliant with UNGC Principles relating to environmental protection, human rights, labour standards and anti-corruption, as well as controversial weapons and the issuers involved in thermal coal, arctic drilling, oil and tar sands, as well as severe ESG controversies. The Fund may use additional ESG screens from time to time in order to exclude securities based on their involvement with an activity that is deemed non-compliant with one or more of such ESG criteria.

The assessment of good governance practices is implemented through the negative screening utilised by the Fund. Companies deemed by the Investment Manager to not violate UNGC principles are considered to exhibit good governance.



## E. Proportion of investments

The Investment Manager employs a binding ESG methodology which aims to build a portfolio where at least 90% of the Fund's assets are invested in securities which are aligned with environmental and social characteristics promoted by the Fund. It is intended that, within such portion of the portfolio, at least 51% of the Fund's assets are invested in securities which are sustainable investments with environmental and / or social objectives. The remaining portion (<10%) of the portfolio, consisting of cash as well as cash equivalents in place held at the Investment Manager's discretion, will not be aligned with the promoted environmental and social characteristics. The Investment Manager may need to temporarily deviate from the targeted ESG best in class allocation in exceptional market conditions, if necessary, to ensure that the Investment Objective is met at all times

The Fund does not commit to making sustainable investments within the meaning of the Taxonomy Regulation.



## F. Monitoring of environmental or social characteristics

The attainment of the environmental and social characteristics is measured through the % allocation of the portfolio to sustainable investments (which shall be at least 51%) and securities that are within the two highest categories of the third party ESG rating.

A further attainment of the environmental and social characteristics promoted by the Fund is measured through the portfolio exclusions of securities that do not meet certain ESG criteria described under the question above. As such, an additional sustainability indicator is a 0% holding in securities that do not meet the relevant ESG criteria disclosed in Section C above.

The environmental and social characteristics are embedded in the investment policy of the Fund and the associated sustainability indicators are monitored by the Investment Manager through its investment oversight program including pre- and post-trade compliance monitoring for ESG screens and regular reviews by a sub-committee of the Investment Manager.



## G. Methodologies

When selecting investments as determined by the Investment Policy of the Fund, the Investment Manager will adopt a best in class approach to ESG considerations by seeking to invest the majority of the Fund's portfolio in securities that are classified as sustainable investments under article 2(17) of SFDR using the Investment Manager's proprietary assessment methodology and, for government and supra-national issuers, classified within the two highest categories of a third party ESG rating.

Additionally, when selecting investments, the Investment Manager and/or Sub-Investment Manager will screen out securities of issuers identified as being non-compliant with UNGC Principles relating to environmental protection, human rights, labour standards and anti-corruption, as well as controversial weapons and the issuers involved in thermal coal, arctic drilling, oil and tar sands, as well as severe ESG controversies.

Sustainable investments made by the Fund are to invest in securities that are classified as "Leaders" or "Outperformers" according to the ESG score of the Investment Manager's proprietary ESG scoring system.

The ESG scoring system developed by the Investment Manager leverages multiple data sources and aligns them to widely accepted, transparent materiality frameworks to generate a unique ESG score for listed companies. It measures the performance of a company's business operations and governance as it relates to financially material ESG challenges facing the issuer's industry.

In order for the security to qualify as a sustainable investment, the company must be a "Leader" or "Outperformer" as determined by the Investment Manager using the ESG score generated by its proprietary process. Companies qualified as "Leaders" or "Outperformers" are deemed to manage and mitigate long-term, financially-material sustainable risks better than its peers and thus operate a more sustainable business model.

For government and supra-national issuers, the Investment Manager uses a third party ESG rating to select issuers classified within the two highest category.

#### ESG Screens

The ESG screens applied to the Fund include the following:

- Controversial Weapons
- UNGC Violations
- Thermal Coal
- Arctic Drilling
- Oil and Tar Sands
- Severe ESG Controversies

Further details on the methodologies used for the ESG screens is as follows:

**Controversial Weapons:** Companies with focused involvement in the following controversial weapons are excluded.  
**Landmines** Landmines are explosives that are designed to detonate at the presence, proximity or contact of a person or vehicle. After being planted, antipersonnel mines can remain undetonated for years, posing a serious risk to civilians after a conflict has ended.

**Biological and chemical weapons** Biological or chemical weapons are munitions that utilize pathogens such as viruses, bacteria, and disease-causing biological agents, toxins, or chemical substances that have toxic properties, to inflict death or harm. Either type can be dispersed in gas, liquid, or solid forms. As these munitions are based on organisms or chemicals, civilians are often unintended victims since the impact zone is constrained only by how far the particles can disperse. For biological weapons, person-to-person transmission of the illness can further exacerbate the civilian impact.

**Cluster weapons** Cluster weapons are air-dropped explosives: bombs, missiles, rockets, or shells that carry sub munitions and disperse them over an area. The sub munitions have a wide impact zone, and often remain undetonated on the ground. These munitions can remain dangerous for years after the conflict has ended, posing a serious risk to civilians.

**Depleted Uranium** Depleted Uranium (DU) munitions are projectiles (bullets, rockets, etc.) that have been equipped with the radioactive chemical substance DU, a byproduct of the uranium enrichment process used to make nuclear weapons and nuclear-reactor fuel. Because of its high density, DU is often used as a penetrator in ammunition to help pierce armor. However, areas where depleted uranium munitions have been used are exposed to its radioactive qualities, causing people living in the area to be more prone to cancers, congenital birth defects, and other illnesses.

**Nuclear Weapons** A nuclear weapon is a device that is capable of releasing nuclear energy in an uncontrolled manner, due to fusion and/or fission reactions, making it a highly destructive explosive. The indiscriminate and disproportionate impact on civilians makes nuclear weapons a controversial weapon.

**White Phosphorus** White phosphorus (WP) is an allotrope of the chemical element phosphorus, which burns fiercely when exposed to oxygen. A WP munition is any projectile (eg flares, grenades, or mortars) that is equipped with WP, in order to act as a smoke-producing agent, or as tracer, illumination, or incendiary munition.

UNGC Principles: Companies directly complicit in violations of core international norms and conventions, as described in the UNGC Principles are excluded.

The UNGC is the world's largest corporate sustainability initiative with 13,000 participants from 170 countries. It consists of a set of internationally recognized principles that encompass important issues, such as human rights, labour, the environment, and anti-corruption practices. The 10 principles are as follows:

#### Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

#### Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

#### Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

#### Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Thermal Coal: Companies involved in the extraction or power generation of thermal coal are excluded.

Arctic Drilling: Companies involved in oil and gas exploration in the Arctic regions are excluded.

Oil and Tar Sands: Companies for whom a meaningful portion of their average daily production comes from oil sands are excluded.

Severe ESG Controversies: Companies involved in incidents/events that may pose business or reputational risk due to the potential impact on stakeholders, the environment, or the company's operations are excluded.

The exclusion list generated by the ESG screening process is updated once per quarter.

The ESG screen methodology and screening criteria applied to the Fund are subject to SSGA's governance approval process.



## H. Data sources and processing

The Fund utilises State Street Global Advisors' proprietary ESG scoring system to define a sustainable investment. This ESG scoring system draws on data from multiple ESG data providers and leverages the Sustainable Accounting Standards Board's ("SASB") widely accepted, transparent materiality framework, as well as a corporate governance score, to generate the unique score that measures the performance of a company's business operations and governance as it relates to industry-specific ESG factors.

The Fund utilises the Sustainalytics Sovereign Score for rating government and supra-national issuers.

The Fund utilises the following data sources to derive the ESG screens:

**Controversial Weapons** State Street Global Advisors receives universe-level data from two ESG screening data providers: Sustainalytics and MSCI. A screen is then applied to the data to generate lists from each data provider of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee. Companies are excluded if they appear on either or both of the lists from the two data providers.

**UNGC Violations Data** is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

**Thermal Coal Data** is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

**Arctic Drilling Data** is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

**Oil and Tar Sands Data** is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

**Severe ESG Controversies Data** is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

SSGA receives ESG data from a wide variety of data providers covering various themes including, but not limited to, climate, controversies and governance and leverages multisource data architecture for the analysis and dissemination of ESG data.

SSGA implements an ongoing due diligence process in relation to ESG data providers resulting in regular data quality reports. Such process tracks correlation and coverage dimensions of key ESG and climate metrics and scores between a selection of data providers over time for the covered universe. SSGA may engage with the relevant data providers in relation to any data issues identified by the SSGA teams.



## I. Limitations to methodologies and data

ESG data may be based on certain assumptions, forecasts, projections, views and opinions which may be based on current market trends or anticipated future events. To assess company involvement in different activities and to estimate revenue shares as accurately as possible, data providers strive to obtain information directly from companies and issuers. Sources of data include annual reports, regulatory filings, sustainability reports, press releases, investor presentations, company websites, and other company disclosures. Given the developing and innovative nature of data models, methodologies and assumptions and the inherent uncertainty in predicting forward-looking events, it cannot be guaranteed that the ESG data is always accurate or correct or that the ESG data will satisfy the aims or requirements of any specific client or investor. Furthermore, there may be data that cannot be sourced due to the lack of availability of data sources.



## J. Due diligence

The Investment Manager, on behalf of the Fund, combines a relative value approach to investing with credit quality analysis to identify securities that it believes will provide the greatest stability of capital and the highest probability of repayment, consistent with the Fund's investment objective.

In implementing this strategy, the Investment Manager adopts a best in class approach to ESG considerations by seeking to invest the majority of the Fund's portfolio in securities that are classified as sustainable investments and, for government and supra-national issuers, classified within the two highest categories of a third party ESG rating.

In addition, the Investment Manager applies the negative and norms-based ESG screen prior to the construction of the portfolio of the Fund and on an ongoing basis.

Application of the ESG screens results in the exclusion of any securities from the portfolio based on an assessment of their adherence to certain ESG criteria defined by the Investment Manager. The Fund will screen out securities identified as being non-compliant with UNGC Principles relating to environmental protection, human rights, labour standards and anti-corruption, as well as controversial weapons and the issuers involved in thermal coal, arctic drilling, oil and tar sands, as well as severe ESG controversies. The Fund may use additional ESG screens from time to time in order to exclude securities based on their involvement with an activity that is deemed non-compliant with one or more of such ESG criteria.



## K. Engagement policies

Is engagement part of the environmental or social investment strategy?

Yes

No



While SSGA engagement policies are not directly embedded into the Fund's investment strategy, for SSGA the informed exercise of voting rights coupled with targeted and value-driven engagement is the most effective mechanism of creating value and managing Sustainability Risk for the investors. SSGA's Asset Stewardship programme consolidates all voting and engagement activities across asset classes, irrespective of investment strategy or geographic region. The engagement strategy is built on SSGA's ability to prioritise and allocate resources to companies and issues that have the greatest potential impact. SSGA's Asset Stewardship programme is underpinned by 3 separate pillars, that is, (i) providing information and guidance to investee companies on the development of ESG practices across key issues, (ii) engaging with portfolio companies to encourage transparent, accountable, high performing boards and companies, and (iii) by exercising voting rights in a manner that reflects long term investment objectives for the purpose of influencing the activity or behaviour of the issuers. To support this process, SSGA has developed proprietary in-house tools to help identify companies for active engagement based on various financial and ESG indicators.



L. Reference benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the Fund?

- Yes
- No