

STATE STREET GLOBAL ADVISORS LIQUIDITY PLC
78 Sir John Rogerson's Quay
Dublin 2
Ireland

an umbrella fund with segregated liability between sub-funds

30 June 2019

Dear shareholder

SSGA Liquidity plc - ("the Fund")
Reportable income calculation- Period ended 31 December 2018

Background to UK Reporting Fund Status

Your shareholding in the relevant share class of the Fund constitutes an interest in an offshore fund from a United Kingdom ("UK") taxation perspective. Each Share Class is treated as a separate 'offshore fund' for these purposes.

The UK Offshore Funds Regulations came into effect on 1 December 2009 and provide that if an investor resident in the United Kingdom for taxation purposes holds an interest in an offshore fund and that offshore fund is a 'non-reporting fund', any gain accruing to that investor upon the sale or other disposal of that interest will be charged to United Kingdom tax as income rather than a capital gain. Alternatively, where an investor resident in the United Kingdom holds an interest in an offshore fund that has been a 'reporting fund' for all periods of account for which they hold their interest, any gain accruing upon sale or other disposal of the interest will be subject to tax as a capital gain rather than income.

A share class must apply to HM Revenue & Customs ("HMRC") to become a reporting fund and once in the regime remains a reporting fund permanently so long as the annual duties are met. Reporting funds have an annual requirement to calculate and report to UK investors and HMRC the reportable income per share and distributions made for each share class. Provided the Fund complies with this annual reporting requirement, any gain accruing upon sale or other disposal of the interest by each UK shareholder will be subject to tax as a capital gain rather than income.

The share classes of the Fund which are listed below have been accepted by HMRC into the reporting regime.

Sub-fund/Share class:	ISIN:
SSGA USD Liquidity Fund Institutional Stable NAV Shares *	IE0003409558
SSGA USD Liquidity Fund Global Securities Lending Shares *	IE00B559JK91
SSGA USD Liquidity Fund S Shares *	IE00B0NLLC82
SSGA USD Liquidity Fund Institutional Accumulating Shares	IE00B1XG4657
SSGA USD Liquidity Fund S2 Shares *	IE00B4528261
SSGA USD Liquidity Fund S3 Shares *	IE00B3SZ2G77
SSGA USD Liquidity Fund Z Accumulating Shares	IE00B44FR967
SSGA USD Liquidity Fund Z Stable NAV Shares *	IE00B42RN965
SSGA GBP Liquidity Fund Institutional Stable NAV Shares *	IE0003410440
SSGA GBP Liquidity Fund Global Securities Lending Shares *	IE00B4YWYX09

SSGA GBP Liquidity Fund S Shares *	IE00B0NLLD99
SSGA GBP Liquidity Fund Institutional Accumulating Shares	IE00B1XG4764
SSGA GBP Liquidity Fund S2 Shares *	IE00B3SYZD25
SSGA GBP Liquidity Fund S3 Shares *	IE00B45T2M55
SSGA GBP Liquidity Fund Z Accumulating Shares	IE00B4QXXG75
SSGA GBP Liquidity Fund Z Stable NAV Shares *	IE00B44TL854
SSGA EUR Liquidity Fund Institutional Stable NAV Shares *	IE0003411307
SSGA EUR Liquidity Fund Global Securities Lending Shares *	IE00B4ZTH192
SSGA EUR Liquidity Fund S Shares *	IE00B0NLLG21
SSGA EUR Liquidity Fund Institutional Accumulating Shares	IE00B1XG4871
SSGA EUR Liquidity Fund S2 Shares *	IE00B46CRJ50
SSGA EUR Liquidity Fund S3 Shares *	IE00B3LCZR71
SSGA EUR Liquidity Fund Z Accumulating Shares	IE00B45B5111
SSGA EUR Liquidity Fund Z Stable NAV Shares *	IE00B3ZF9B49
State Street US Treasury Liquidity Fund Premier Stable/Accumulating NAV Shares *	IE00BYXBJ999
State Street US Treasury Liquidity Fund Distributor Stable NAV Shares *	IE00BYXBJ775

* These Share Classes are deemed to be Constant NAV share classes and as a result are not required to report reportable income to investors on the basis that investors are taxed on the cash distributions declared at each distribution point.

What does this mean for investors?

For the year ended 31 December 2018, the attached statement is the Statement of Reportable income.

The Statement of Reportable income contains the following information:

- The amount of cash distributed to participants per unit of interest in the fund in respect of the reporting period,
- The dates on which cash distributions (if any) were made,
- The excess of reportable income over cash distributions in the reporting period,
- The date on which the excess reportable income becomes taxable in the hands of the U.K. investor, referred to as the Fund distribution date, and
- Confirmation that the fund remains a Reporting Fund at the date the Fund makes the report available.

U.K. investors in the Fund will be required to include on their tax return any cash distributions received during the year and their proportionate share of reportable income in excess of any cash distributions made in relation to the profits of the accounting period. The proportionate share of the excess reportable income is calculated as follows:

**Total number of shares held by the investor x Excess reportable income per share
in each share class at the year-end (ie 31 Dec 2018)**

The excess reportable income per share must be multiplied by the total number of shares you held in that each share class at 31 December 2018 in order to derive the total reportable income to be included in your tax return.

Income is deemed to have arisen to investors as follows:

- **UK individual investors**

The deemed distribution date for excess reportable income over any cash distributions received is 6 months after the end of the accounting period. As the accounting year end of the Fund is 31 December, the deemed distribution date is 30 June in the following year.

Therefore, for the year ended 31 December 2018, excess reportable income will be deemed to arise on 30 June 2019, falling within the UK fiscal year ended 5 April 2020. This must therefore be included in your 2019/2020 tax return.

- **UK corporate investors**

As the deemed distribution date is 6 months after the end of the accounting period, this income must be included in your tax return in accordance with the accounting period in which this date falls.

Reportable income for the year ended 31 December 2018

UK investors in the Fund will be required to include on their tax return any cash distributions received during the year and their proportionate share of reportable income in excess of any cash distributions made in relation to the profits of the accounting period.

Please see the attached Investor Report for the reportable income per share for each share class of the Fund.

Reportable income will be subject to tax for individual investors at the rates applying to dividends (or interest where the share class is designated as a bond fund – see below). From 6 April 2016, the rates are as follows

Basic Rate – 7.5%
Higher Rate – 32.5%
Additional Rate – 38.1%

In addition, the first £2,000 of dividends received in the tax year 2019/2020 is not subject to tax.

UK resident corporate investors may benefit from one of the exemptions from UK corporation tax on dividends received from the Funds.

Please note that in certain instances, dividends received and excess reportable income attributable to U.K investors, should be treated as interest income and taxed accordingly.

Section 378A of the Finance Act 2009 states that where a dividend is paid by an offshore fund and the offshore fund meets the qualifying investment test (i.e. the market value of the fund's qualifying investments exceeds 60% of the market value of all assets of the fund), then the dividend is treated as interest for UK income tax purposes.

The same treatment applies for any excess reportable income which may arise. For the purposes of the legislation, qualifying investments includes; money placed on interest, securities, shares in a building society, qualifying holdings in an open-ended investment company, a unit trust scheme or an offshore fund, alternative finance arrangements, derivative contracts whose underlying subject matter consists wholly of any of the above, interest rates, credit worthiness or currency.

Double taxation relief

Under regulation 99 of the Offshore Fund (Tax) Regulations 2009 (S.I.2009/3001), in order to avoid double taxation, any excess reported income deemed to be received by UK investors can be treated as expenditure for the acquisition of their holdings in the Fund. In effect, the acquisition cost of your interest in the Fund shall be increased by the amount of excess reportable income in the calculation of capital gains. We set out below how such relief works in principle.

Proceeds	x
Original acquisition cost	(x)
Excess reported income (as per the Appendix)	<u>(x)</u>
Capital gain	x

Equalisation

Please note that the Fund does not operate equalisation.

Website reporting

Please note that the investor report for year ended 31 December 2018 will also be posted on the fund's website www.SSGA.com. Unless we receive a specific request from you to receive this report via post latest by 30th June 2019 the investor report will only be available on the above website.

If you have any queries on the above, please contact our investor relations team.

Yours faithfully

EMEA Product Management
June 2019

This summary should not be taken to constitute legal or tax advice, and investors should consult their own professional advisers on the implications of making an investment in, and holding or disposing of shares and the receipt of distributions (whether or not on redemption) with respect to such shares under the law of the countries in which they are liable to taxation.

Enclosures

State Street Global Advisors Liquidity plc

UK reporting fund status report to investors

Reporting Period End 31 December 2018

Notes

1 All per-share figures to 4 decimal places of relevant currency

2 Distribution per share - as at time distribution made

3 Excess is over sum of amounts distributed for the fund's reporting period

4 Excess apportioned among shares at Reporting period end date

5 Date on which Reported Income / excess of Reported Income over distributions taxable in investor's hands: reporting period end date + 6 months

UMBRELLA FUND NAME	SUB FUND NAME	SHARE CLASS / SERIES NAME	ISIN	HMRC REFERENCE	CURRENCY OF SHARE CLASS	PER UNIT EXCESS REPORTABLE INCOME OVER DISTRIBUTIONS IN RESPECT OF THE REPORTING PERIOD ^{(1) (3) (4)}	FUND DISTRIBUTION DATE ⁽⁵⁾	DOES THE FUND REMAIN A REPORTING FUND AT THE DATE THIS REPORT IS MADE AVAILABLE?	DOES THE FUND MEET THE DEFINITION OF A BOND FUND FOR THE REPORTING PERIOD?
State Street Global Advisors Liquidity plc	SSGA USD Liquidity Fund	Institutional Accumulating Shares	IE00B1XG4657	S0026-0009	USD	0.2126	30/06/2019	Yes	Yes
State Street Global Advisors Liquidity plc	SSGA USD Liquidity Fund	Z Accumulating Shares	IE00B44FR967	S0026-0018	USD	0.2315	30/06/2019	Yes	Yes
State Street Global Advisors Liquidity plc	SSGA GBP Liquidity Fund	Institutional Accumulating Shares	IE00B1XG4764	S0026-0008	GBP	0.0602	30/06/2019	Yes	Yes
State Street Global Advisors Liquidity plc	SSGA GBP Liquidity Fund	Z Accumulating Shares	IE00B4QXXG75	S0026-0022	GBP	0.0704	30/06/2019	Yes	Yes
State Street Global Advisors Liquidity plc	SSGA EUR Liquidity Fund	Institutional Accumulating Shares	IE00B1XG4871	S0026-0014	EUR	0.0000	30/06/2019	Yes	Yes
State Street Global Advisors Liquidity plc	SSGA EUR Liquidity Fund	Z Accumulating Shares	IE00B45B5111	S0026-0026	EUR	0.0000	30/06/2019	Yes	Yes