

State Street SPDR STOXX Europe 600 SRI UCITS ETF

Website disclosure for an Article 8 fund



A. Tiivistelmä

State Street SPDR STOXX Europe 600 SRI UCITS ETF ("**rahasto**") on indeksirahasto, joka seuraa STOXX Europe 600 SRI Index -indeksin ("**indeksi**") kehitystä. Indeksini on nimetty vertailuarvoksi rahaston edistämien ympäristöön tai yhteiskuntaan liittyvien ominaisuuksien toteutumiseksi. Rahaston edistämät ympäristöön ja yhteiskuntaan liittyvät ominaisuudet toteutuvat rahastolle nimetyin indeksin kautta. Niitä ovat Sustainalyticsin arviointi ja luokitus, jotka tehdään indeksiin mahdollisesti sisällytettävien yritysten erilaisten ympäristöön, yhteiskuntaan ja hallintotapaan liittyvien ominaisuuksien pohjalta.

Rahasto edistää ympäristöön tai yhteiskuntaan liittyviä ominaisuuksia, mutta sen tavoitteena ei ole kestävien sijoitusten tekeminen.

Rahaston edistämät ympäristöön ja yhteiskuntaan liittyvät ominaisuudet toteutuvat rahastolle nimetyin indeksin kautta. Niitä ovat ESG-luokitus, joka muodostetaan sijoituskohteena olevilta yrityksiltä kerättyjen tietojen ja Sustainalyticsin tekemän ESG-pisteytyksen pohjalta. Lisäksi indeksistä suljetaan pois arvopapereita ESG-ominaisuuksien perusteella ottamalla huomioon ESG-luokitukset, osallistuminen tiettyihin kiistanalaisiin liiketoiminta-alueisiin sekä päästöintensiteetti, kuten indeksimenetelmässä on esitetty.

Salkunhoitaja ja/tai apulaissalkunhoitaja sijoittavat rahaston nimissä ensisijaisesti indeksiin sisältyviin arvopapereihin noudattaen toisintamisstrategiaa, kuten tarjousesitteen "Investment Objectives and Policies – Index Tracking Funds" -osassa on tarkemmin kuvattu. Sijoitukset tehdään aina tarjousesitteessä esitettyjen sijoitusrajoitusten puitteissa.

Salkunhoitaja soveltaa sitovaa ESG-menetelmää, jonka tavoitteena on rakentaa salkku, jossa vähintään 90 % rahaston varoista sijoitetaan rahaston edistämien ympäristöön ja yhteiskuntaan liittyvien ominaisuuksien mukaisiin arvopapereihin. Jäljelle jäävä osuus (< 10 %) salkusta, joka koostuu salkunhoitajan harkinnan pohjalta käteisestä ja käteiseen verrattavista varoista, ei pyri olemaan rahaston edistämien ympäristöön ja yhteiskuntaan liittyvien ominaisuuksien mukainen. Niiltä osin kuin rahasto saattaa käyttää johdannaisia, niitä ei käytetä rahaston edistämien ympäristöön tai yhteiskuntaan liittyvien ominaisuuksien saavuttamiseen. Rahasto ei sitoudu kestävien sijoitusten tekemiseen SFDR-asetuksen tai luokitusjärjestelmäasetuksen tarkoittamassa mielessä.

Indeksiin sisältyviin arvopapereihin sijoitettu osuus rahaston salkusta muodostaa kestävyysindikaattorin, jota käytetään mittaamaan kunkin rahaston edistämien ympäristöön tai yhteiskuntaan liittyvän ominaisuuden toteutumista.

Linkki indeksimenetelmään, joka kattaa rahaston edistämät ympäristöön tai yhteiskuntaan liittyvät ominaisuudet, on saatavilla asianomaisessa täydennyksessä ja jäljempänä tässä asiakirjassa.

Asianomaisten ympäristöön tai yhteiskuntaan liittyvien ominaisuuksien saavuttamiseen käytetyt tietolähteet on ilmoitettu indeksimenetelmässä.

Riskinä on, että indeksinhoitaja voi tehdä virheitä, esimerkiksi arvioida väärin sijoituspolitiikassa kuvattuja seurantakriteerejä ja/tai sisällyttää indeksiin seurantaprosessin myötä vääriä / sulkea pois oikeita osatekijöitä. Kestävään sijoittamiseen liittyvät tiedot saattavat pohjautua tiettyihin oletuksiin, ennusteisiin, ennakoiteihin, näkemyksiin ja mielipiteisiin, jotka voivat perustua tämänhetkisiin markkinasuuntauksiin tai odotettuihin tuleviin tapahtumiin. Tietomallien, menetelmien ja oletusten kehittyvän ja innovatiivisen luonteen vuoksi sekä tulevien tapahtumien ennustamiseen luonnostaan liittyvien epävarmuuksien vuoksi ei voida taata, että kestävään sijoittamiseen liittyvät tiedot olisivat aina täsmällisiä tai virheettömiä tai että kyseiset tiedot täyttäisivät kenenkään tietyn asiakkaan tai sijoittajan tavoitteet tai vaatimukset. Lisäksi joitain tietoja ei välttämättä pystytä hankkimaan tietolähteiden puutteen vuoksi.

State Street Investment Management valvoo ulkopuolisia toimittajia, mukaan lukien indeksinhoitajat, kolmansiin osapuoliin sovellettavan riskienhallintaohjelmansa mukaisesti. State Street Investment Management on säännöllisesti yhteydessä indeksinhoitajiin palvelutasojen arvioimiseksi ja suorittaa lisäksi indeksinhoitajien prosessien, järjestelmien ja järjestelmävalvonnan, tietojen, laadunvalvonnan ja IT-tietoturvan kohdennettuja tarkastuksia.

Vaikuttamispolitiikkoja ei ole suoraan sisällytetty rahaston sijoitusstrategiaan. Valtakirjaäänestykset ja vaikuttamistoimet toteutetaan yhtiön omistajaohjaus- ja vaikuttamispolitiikan (Sustainability Stewardship Service Proxy Voting and Engagement Policy) mukaisesti.

Rahasto on nimennyt indeksin vertailuarvoksi rahaston edistämien ympäristöön tai yhteiskuntaan liittyvien ominaisuuksien toteutumiseksi. Indeksini tarkistetaan neljännesvuosittain maaliskuussa, kesäkuussa, syyskuussa ja joulukuussa.

Lisätietoja on STOXX Europe 600 SRI -menetelmäkuvauksessa:

<https://www.stoxx.com/index-details?symbol=SXXRSRI>



B. No sustainable investment objective

The Fund promotes environmental or social characteristics, but does not have as its objective a sustainable investment.



C. Environmental or social characteristics of the financial product

The environmental and social factors promoted by the Fund are those which contribute to the Sustainalytics' (the ESG research, ratings and data firm utilised by the Index provider) ESG Ratings, which are a function of an assessment and rating by Sustainalytics of various environmental, social and governance characteristics for companies in the index universe.

For more information on Sustainalytics' ESG Ratings scores, please refer to the Overview of Sustainalytics' ESG Risk Ratings:

https://connect.sustainalytics.com/hubfs/SFS/Sustainalytics%20ESG%20Risk%20Ratings_Issuer%20Backgrounder.pdf.

In addition, the index excludes securities based on their ESG characteristics, considering both their ESG rating and their involvement in certain controversial business activities and based on the level of their emission intensities as outlined in the Index methodology.



D. Investment Strategy

The investment policy of the Fund is to track the performance of the Index (or any other index determined by the Directors from time to time to track substantially the same market as the Index) as closely as possible, while seeking to minimise as far as possible the tracking difference between the Fund's performance and that of the Index.

The Index measures the performance of European companies that are eligible for the STOXX Europe 600 Index, (the "**Standard Index**"), while excluding securities based on their ESG characteristics, considering both their ESG rating and their involvement in certain controversial business activities, and based on the level of their emission intensities as outlined in the Index methodology. The adoption of these screens within the Index correspond to the environmental and social factors which the Fund promotes, as further described in the "ESG Screening" and "ESG Best in Class Investing" subsection of the "ESG Investing" section of the Prospectus. Companies deemed by the Index provider to adhere to international norms and principles are considered to exhibit good governance.

The Investment Manager and/or Sub-Investment Manager, on behalf of the Fund, will invest using the replication strategy as further described in the "Investment Objectives and Policies – Index Tracking Funds" section of the Prospectus, primarily in the securities of the Index, at all times in accordance with the Investment Restrictions set forth in the Prospectus.

Companies deemed by the Index provider to adhere to international norms and principles are considered to exhibit good governance.

For more information, please refer to the ESG Reporting section of Benchmark Statement:

https://www.stoxx.com/document/Indices/otherinformation/esgreporting/ESG_regulatory_methodology_SXXP_SRI.pdf



E. Proportion of investments

At least 90% of the Fund's assets are invested in securities that are constituents of the Index and aligned with environmental and / or social characteristics, while the Index provider applies ESG ratings on all the Index constituents. The Fund does not commit to making sustainable investments within the meaning of the SFDR or the Taxonomy Regulation. The Fund may hold 10% of its assets in cash or cash equivalents and derivatives used for currency hedging and efficient portfolio management purposes, at the Investment Manager's discretion. Such assets will not be aligned with environmental and social characteristics, nor will there be any environmental or social safeguards in place.



F. Monitoring of environmental or social characteristics

The sustainability indicators used to measure the attainment of each of the environmental or social characteristics promoted by the Fund is the ESG rating that is constituted by data collected from investee companies and based on ESG scoring undertaken by Sustainalytics.

The Fund rebalances on a quarterly basis, in line with the Index rebalancing frequency.



G. Methodologies

The index methodology which captures the environmental or social characteristics promoted by the financial product is made available in the fund supplement.



H. Data sources and processing

The data sources used to attain the relevant environmental or social characteristics are detailed in the index methodology.



I. Limitations to methodologies and data

There is a risk that the index provider may make errors, such as incorrect assessment of the screen criteria described in the Investment Policy and/or include incorrect/exclude correct constituents in the screening process. Sustainable investing scoring and screening is subject to inherent methodological limitations. Any assessment of sustainable investing criteria by an Index is based on the data provided by third parties. Such assessments are dependent upon information and data that may be incomplete, inaccurate or unavailable, which could cause incorrect assessment of an issuer's sustainable investing performance. In particular there may be potential inconsistencies, inaccuracy or a lack of availability of required sustainable investing data, particularly where this is issued by external data providers. These limitations may include but are not limited to issues relating to:

- Missing or incomplete data from companies (for example, relating to their capacity to manage their Sustainability Risks) which have been used as input for any scoring model;
- The quantity and quality of sustainable investing data to be processed; and
- The identification of relevant factors for the sustainable investing analysis.

Sustainable investing 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 sustainable investing data is always accurate or correct or that the sustainable investing 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. For certain markets and types of issuers, companies or securities there may be significant limitations in the amount of sustainable investing data that is available or no sustainable investing data may be available such that no screening is performed by the index provider. In certain situations where screening data is not available for an issuer, an investee company or a security, the index provider may develop and use alternative screening methodologies, as a proxy, use data relating to a different entity to the issuer or the investee company, which presents a risk that this data may not accurately reflect the sustainability or other characteristics of the issuer or the investee company. In certain situations, even where screening data is available it may not be used as part of the index provider's screening process. It is not expected that such limitations would affect how the environmental and social characteristics promoted by the Fund are met.



J. Due diligence

State Street Investment Management oversees external vendors, including index providers, in line with its third party risk management programme. State Street Investment Management engages with index providers regularly for service level reviews and also undertakes targeted reviews of index providers' processes, systems & systems controls, data, quality controls & IT security.



K. Engagement policies

Is engagement part of the environmental or social investment strategy?

- Yes
 No

While engagement policies are not directly embedded into the Fund's investment strategy, proxy voting and engagement activities in respect of securities held by the Fund are conducted pursuant to the terms of the Sustainability Stewardship Service Proxy Voting and Engagement Policy (the "**Sustainability Policy**"). The Sustainability Policy focuses on risks and opportunities that may impact long-term value creation, with a focus on sustainability priorities such as climate change, nature, human rights and diversity.



L. Reference benchmark

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

- Yes
 No

The Fund is an index fund tracking the performance of the STOXX Europe 600 SRI Index. The Index has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund. The Index applies an ESG scoring and screening methodology using the ESG rating that is constituted by data collected from investee companies and based on ESG scoring undertaken by Sustainalytics.

The Index reviews are conducted on a quarterly basis in March, June, September and December.

Please refer to STOXX Europe 600 SRI Index methodology:

<https://www.stoxx.com/index-details?symbol=SXXRSRI>

STOXX Limited, Deutsche Börse Group and their licensors, research partners or data providers have no relationship to the State Street Global Advisors, other than the licensing of the STOXX® Europe 600 SRI and the related trademarks for use in connection with the State Street SPDR STOXX Europe 600 SRI UCITS ETF.

STOXX, Deutsche Börse Group and their licensors, research partners or data providers do not:

- » sponsor, endorse, sell or promote the State Street SPDR STOXX Europe 600 SRI UCITS ETF.
- » recommend that any person invest in the State Street SPDR STOXX Europe 600 SRI UCITS ETF or any other securities.
- » have any responsibility or liability for or make any decisions about the timing, amount or pricing of State Street SPDR STOXX Europe 600 SRI UCITS ETF.
- » have any responsibility or liability for the administration, management or marketing of the State Street SPDR STOXX Europe 600 SRI UCITS ETF.
- » consider the needs of the State Street SPDR STOXX Europe 600 SRI UCITS ETF or the owners of the State Street SPDR STOXX Europe 600 SRI UCITS ETF in determining, composing or calculating the Index or have any obligation to do so.

STOXX, Deutsche Börse Group and their licensors, research partners or data providers give no warranty, and exclude any liability (whether in negligence or otherwise), in connection with the State Street SPDR STOXX Europe 600 SRI UCITS ETF or their performance.

STOXX does not assume any contractual relationship with the purchasers of the State Street SPDR STOXX Europe 600 SRI UCITS ETF or any other third parties.

Specifically,

» STOXX, Deutsche Börse Group and their licensors, research partners or data providers do not give any warranty, express or implied, and exclude any liability about:

- The results to be obtained by the State Street SPDR STOXX Europe 600 SRI UCITS ETF, the owner of the State Street SPDR STOXX Europe 600 SRI UCITS ETF, or any other person in connection with the use of the Index and the data included in the Index;
- The accuracy, timeliness, and completeness of Index and its data;
- The merchantability and the fitness for a particular purpose or use of the STOXX Europe 600 SRI and its data;
- The performance of the State Street SPDR STOXX Europe 600 SRI UCITS ETF generally.

» STOXX, Deutsche Börse Group and their licensors, research partners or data providers give no warranty and exclude any liability, for any errors, omissions or interruptions in the STOXX Europe 600 SRI or its data;

» Under no circumstances will STOXX, Deutsche Börse Group or their licensors, research partners or data providers be liable (whether in negligence or otherwise) for any lost profits or indirect, punitive, special or consequential damages or losses, arising as a result of such errors, omissions or interruptions in the relevant index or its data or generally in relation to the State Street SPDR STOXX Europe 600 SRI UCITS ETF, even in circumstances where STOXX, Deutsche Börse Group or their licensors, research partners or data providers are aware that such loss or damage may occur.

The licensing Agreement between the State Street Global Advisors and STOXX is solely for their benefit and not for the benefit of the owners of the State Street SPDR STOXX Europe 600 SRI UCITS ETF or any other third parties.

"SPDR®" is a registered trademark of Standard & Poor's Financial Services LLC ("S&P") and has been licensed for use by State Street Corporation. No financial product offered by State Street Corporation or its affiliates is sponsored, endorsed, sold or promoted by S&P or its affiliates, and S&P and its affiliates make no representation, warranty or condition regarding the advisability of buying, selling or holding units/shares in such products. Standard & Poor's®, S&P®, SPDR®, S&P 500® are registered trademarks of Standard & Poor's Financial Services LLC and have been licensed for use by State Street Corporation.