State Street World Small Cap Enhanced Active Equity UCITS ETF - Website disclosure for an Article 8 fund

A. Summary

L'obiettivo di State Street World Small Cap Enhanced Active Equity UCITS ETF (il "Fondo") consiste nell'offrire un rendimento superiore alla performance dei mercati azionari sviluppati ed emergentidi tutto il mondo.

Il Fondo promuove caratteristiche ambientali o sociali e, pur non avendo come obiettivo un investimento sostenibile, cercherà di collocare almeno il 25% del suo portafoglio in investimenti sostenibili ai sensi dell'articolo 2(17) del SFDR, avvalendosi della metodologia di valutazione proprietaria del Gestore degli investimenti.

Il Fondo promuove caratteristiche ambientali legate alla riduzione dell'impronta ambientale e degli effetti sociali negativi escludendo gli investimenti in società coinvolte in carbone termico, esplorazione di petrolio e gas dell'Artico, estrazione di sabbie bituminose e gravi controversie ESG, oltre che nelle società che violano i principi del Global Compact delle Nazioni Unite ("UNGC") (i "Principi UNGC") relativi all'ambiente (principi da 7 a 9).

Il Fondo promuove le caratteristiche sociali concernenti quanto segue: (a) riduzione della disponibilità di armi escludendo l'investimento in società associate ad armi controverse e armi da fuoco civili, (b) riduzione degli effetti negativi sulla salute escludendo l'investimento in società associate al tabacco, (c) promozione dei diritti umani, degli standard lavorativi e della lotta alla corruzione escludendo l'investimento in società che violano i Principi UNGC correlati ai diritti umani (Principi 1 e 2), al lavoro (principi da 3 a 6) e alla lotta alla corruzione (principio 10), nonché le società associate a gravi controversie ESG.

Il Gestore degli investimenti adotta una metodologia ESG vincolante che punta a costruire un portafoglio in cui almeno il 90% del patrimonio del Fondo sia investito in titoli allineati alle caratteristiche ambientali e sociali promosse dal Fondo. Si prevede che, nell'ambito di tale quota del portafoglio, almeno il 25% delle attività del Fondo sia investito in titoli che sono investimenti sostenibili con obiettivi ambientali e/o sociali. La quota residua (<10%) del portafoglio, composta da liquidità e strumenti liquidi equivalenti, inclusi gli strumenti finanziari derivati impiegati a scopo di gestione efficiente del portafoglio o di copertura, detenuti a discrezione del Gestore degli investimenti, non sarà allineata alle caratteristiche ambientali e sociali promosse. Nella misura in cui il Fondo possa ricorrere a strumenti finanziari derivati, questi non saranno utilizzati per soddisfare le caratteristiche ambientali o sociali promosse dal Fondo.

Il Fondo non si impegna a effettuare investimenti sostenibili ai sensi del Regolamento sulla tassonomia.

Il rispetto delle caratteristiche ambientali e sociali promosse dal fondo viene misurato tramite la percentuale del portafoglio investita in titoli rientranti nei filtri di esclusione e basati su norme.

Al fine di rispettare le caratteristiche ambientali e sociali promosse dal Fondo, il Gestore degli investimenti adotta una strategia di investimento attiva, proprietaria del Gestore degli investimenti stesso e/o del Subgestore degli investimenti, che applica un modello quantitativo di selezione multifattoriale (modello alfa) mirato a stimare l'attrattiva dei titoli valutando al contempo le emissioni di carbonio di un'impresa beneficiaria degli investimenti. Inoltre, il Gestore degli investimenti applica un filtro ESG di esclusione e basato su norme anche prima della costruzione del portafoglio nonché su base continuativa. Il Fondo escluderà i titoli di emittenti che non rispettano i Principi UNGC relativi alla protezione dell'ambiente, ai diritti umani, agli standard del lavoro e alla lotta alla corruzione o che sono associati a gravi controversie ESG, armi controverse, armi da fuoco civili, tabacco, carbone termico, esplorazione di petrolio e gas dell'Artico ed estrazione di sabbie bituminose.

State Street Investment Management esegue un processo di due diligence continua sui fornitori di dati di sostenibilità che determina rapporti periodici sulla qualità dei dati e può relazionarsi con i fornitori di dati pertinenti per quanto concerne eventuali problematiche relative ai dati identificate.

I dati di sostenibilità possono essere basati su determinate ipotesi, previsioni, proiezioni, visioni e opinioni, che a loro volta possono basarsi su tendenze di mercato correnti o eventi futuri previsti. Considerata la natura emergente e innovativa dei modelli di dati, delle metodologie e delle ipotesi, nonché l'incertezza insita nelle previsioni di eventi futuri, non si può garantire che i dati di sostenibilità siano sempre accurati o corretti o che raggiungano le finalità o soddisfino i requisiti di un cliente o di un investitore specifico. Alcuni dati potrebbero inoltre non essere ottenuti a causa della mancanza di disponibilità di fonti di dati.

Le politiche di impegno di State Street Investment Management non sono direttamente integrate nella strategia d'investimento del Fondo. Tuttavia, il programma di Asset Stewardship di State Street Investment Management consolida tutte le attività di voto e di impegno nelle varie classi di attività, indipendentemente dalla strategia d'investimento o dalla regione geografica, anche per il Fondo.

Per maggiori informazioni e dettagli si rimanda alle rispettive sezioni riportate di seguito, al Prospetto e al Supplemento pertinente.

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 a minimum of 25% of its portfolio in sustainable investments under article 2(17) of SFDR using the Investment Manager's proprietary assessment methodology.

Sustainable investments that the financial product partially intends to make should not cause significant harm to any environmental or social sustainable investment objective. In this respect, the Investment Manager considers the mandatory principal adverse indicators ("**PAIs**") on sustainability factors by combining the incorporation of the SASB materiality framework in the Investment Manager's Sustainability Rating and the application of the negative and norms-based screens to the sustainable investments included in the Fund's portfolio. By investing in securities classified as "Leaders or Outperformers" in accordance with the Investment Manager's Sustainability Rating and applying the relevant negative and norms-based screens, 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 PAIs on sustainability factors as part of the consideration of sustainable investments in selecting the securities for the Fund and by applying the negative and norms-based ESG screen prior to the construction of the portfolio. Specifically, the Fund considers:

- Exposure to companies active in the fossil fuel sector
- Violations of UNGC Principles
- 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 promotes environmental characteristics related to reduction of environmental footprint and adverse social impacts by excluding investments in companies that are involved in thermal coal, Arctic oil & gas exploration, oil sands extraction, severe ESG controversies, as well as the companies which violate UNGC Principles relating to the environment (principles 7 to 9).

The Fund promotes social characteristics related to: (a) reduction of the availability of weapons by excluding investment in companies associated with controversial weapons and civilian firearms, (b) reduction of adverse health impacts by excluding investment in companies associated with tobacco, (c) support for human rights, labour standards and anti-corruption by excluding investment in companies which violate UNGC Principles relating to human rights (Principles 1 and 2), labour (principles 3 to 6) and anti-corruption (principle 10) as well as companies associated with severe ESG controversies.

The UNGC Principles is the world largest corporate sustainability initiative aimed at companies to align their strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.

Business involvement: The definition of "involved" in relation to each activity, as set out above, is determined using the Investment Manager's proprietary methodology. Each activity may be based on generating or deriving a revenue from the activity that exceeds a percentage of revenue or a defined total revenue threshold, or any exposure to the activity regardless of the amount of revenue received. The activity may relate to production or distribution or both in accordance with the Investment Manager's proprietary methodology. For certain industries the Investment Manager applies a maximum percentage thresholds typically based on revenue from production and/or distribution (which can vary depending on whether the issuer is a producer, distributor or service provider). Please refer to section G for more details.

The specific list of applicable exclusions may evolve and may be amended from time to time by the Investment Manager, subject to complying with the Central Bank's requirements. The Fund allocates minimum 25% of the Fund's portfolio to sustainable investments. In order for the security to qualify as a sustainable investment for the Fund, it must be classified as a "Leader" or "Outperformer" as determined by the Investment Manager. A "Leader" or "Outperformer" is defined as a security within the top 30th percentile of the Investment Manager's sustainability coverage universe, as determined by the Investment Manager using the Sustainability Rating generated by its proprietary process.

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, will invest using an active investment strategy, which applies a quantitative multi-factor stock selection model (alpha model) to evaluate the attractiveness of stocks. This alpha model generates return forecasts for stocks. The model is centered around a relative assessment of each stock on quality, value and sentiment. The model uses natural language processing to analyse events or news that may cause a stock's price to move. The alpha model also evaluates sector and country return expectations and includes a dynamic component based on both bottom up and top down, macroeconomic inputs. In constructing the portfolio the Investment Manager and/or Sub-Investment Manager seeks to weigh return and risk expectations. Defined risk parameters include limits on country, sector and security weights on an absolute basis and relative to the Index.

In following this strategy, the Investment Manager and/or Sub-Investment Manager may invest in or gain exposure to securities registered in or trading in markets other than those included in the Index. In implementing this strategy, 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. The Fund will screen out securities of issuers that fail to comply with UNGC Principles relating to environmental protection, human rights, labour standards and anti-corruption or are associated with severe ESG controversies, controversial weapons, civilian firearms, tobacco, thermal coal, arctic oil & gas exploration, and oil sands extraction.

The Fund may use additional ESG screens from time to time in order to exclude securities of issuers based on their involvement with an activity that is deemed non-compliant with one or more of such ESG criteria referred to.

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 25% 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, including financial derivative instruments employed for efficient portfolio management or hedging purposes, in place held at the Investment Manager's discretion, will not be aligned with the promoted environmental and social characteristics.

The Fund does not explicitly commit to a separate allocation for socially sustainable investments distinct from environmentally sustainable investments. This approach reflects the Fund's broader ESG strategy, which integrates both environmental and social considerations within its sustainable investment criteria.

To the extent that the Fund may use, for efficient portfolio management purposes only, financial derivative instruments, these will not be used to attain the environmental or social characteristics promoted by the Fund.

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 characteristics promoted by the Fund is measured through:

- % of the portfolio invested in securities violating UNGC Principles in regards to the environment and which are active in thermal coal, arctic oil & gas exploration, and oil sands extraction. The level of exposure to such securities is anticipated to be 0% in respect of the proportion of securities which meet the criteria for business involvement as set out above.

The attainment of the social characteristics promoted by the Fund is measured through:

- % of the portfolio invested in securities violating UNGC Principles and companies associated with controversial weapons, civilian firearms, tobacco and severe ESG controversies. The level of exposure to such securities is anticipated to be 0% in respect of the proportion of securities which meet the criteria for business involvement as set out 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

The investment objective of the Fund is to seek to outperform the performance of the Index over the long term.

ESG Screens

The ESG screens applied to the Fund include the following:

1. Controversial Weapons
2. UNGC Violations
3. Thermal Coal
4. Arctic Drilling
5. Oil Sands
6. Severe ESG Controversies
7. Civilian Firearms
8. Tobacco

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

1. **Controversial Weapons:** The following types of weapons are covered by State Street Investment Management's screen:

- Cluster munitions
- Antipersonnel mines and land mines
- Biological and chemical weapons
- Nuclear Weapons
- Depleted Uranium
- Incendiary weapons and white phosphorus
- Blinding laser weapons
- Non-detectable fragments

Indicator	Definition
Controversial weapons noted above for which: There is evidence of activity The weapon is a core weapon system or a core weapon activity The product has a dedicated scope The scope is key to the production of the weapon	The company is involved in the core weapon system, or components/ services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon.
Any controversial weapon for a subsidiary that the company has >= 50% ownership of	The company is involved, through corporate ownership, in the core weapon system, or components/services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon.
Cluster Munitions Manufacturer = True	Companies that produce cluster munitions whole weapons systems, intended-use components, dual-use components, or delivery platforms.
Land mines Manufacturer = True	Companies that produce whole weapons systems or essential intended or dual-use components for anti-personnel landmines and

	anti-vehicle landmines.
Nuclear Weapons Manufacturer Maximum Revenue Percentage >= 10%	The company's reported revenue (or, where not disclosed, maximum estimated revenue) from nuclear weapons, intended and dual-use components for such products, delivery platforms capable of deploying nuclear weapons, essential components for such delivery platforms, and support services for such products as a percentage of total revenue in its most recently completed fiscal year.
Depleted Uranium Manufacturer = True	Companies involved in the production of depleted uranium weapons, ammunition and armour.
Incendiary Weapons (White Phosphorous) = True	Companies that produce incendiary weapons using white phosphorus.
Biological/Chemical Weapons Maximum Revenue Percentage >= 10%	The company's reported revenue (or, where not disclosed, maximum estimated revenue) from the production of biological and chemical weapons and components for such products as a percentage of total revenue in its most recently completed fiscal year.
Blinding laser weapons = True	Companies that produce blinding laser weapons, that cause permanent blindness t
Non-detectable fragments = True	Companies that produce weapons that use non-detectable fragments.

2. **UNGC Principles:** The UNGC is the world's largest corporate sustainability initiative. It sets forth 10 responsible business principles for companies to follow. Companies who are in violation of the UNGC Principles are screened.

Human Rights

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

Principle 2: They should 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: They should promote the elimination of all forms of forced and compulsory labour.

Principle 5: They should endorse the effective abolition of child labour.

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

Environment

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

Principle 8: They should undertake initiatives to promote greater environmental responsibility.

Principle 9: They should 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.

Indicator	Definition
Global compact principles breached = Noncompliant	A company is assessed as Noncompliant when it is found to be responsible for egregious and severe violations of commonly accepted international norms related to human rights, labor rights, the environment and business ethics. In other words, a company is assessed as Noncompliant when it does not act in accordance with the UN Global Compact Principles and its associated standards, conventions and treaties. The data provider also assesses companies that facilitate third parties in human rights violations due to their involvement in weapons with disproportional and/or nondiscriminatory impact on citizens and society as Noncompliant (with Principle 2 of the UN Global Compact). However, this assessment is limited to companies involved in the production and development of antipersonnel mines, cluster munitions, and chemical and biological weapons, or producers of nuclear weapons who support their proliferation outside of the five designated nuclear states or who violate UN sanctions/ International Atomic Energy Agency rules.

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

Indicator	Definition
Thermal Coal Extraction >=10%	The company derives revenue from thermal coal extraction
Thermal Coal Power Generation >=10%	The company derives revenue from generating electricity from thermal coal.

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

Indicator	Definition
Arctic Oil and Gas Exploration, level of involvement >=10%	The company derives revenue from oil and gas exploration and extraction in the Arctic.

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

Indicator	Definition
Oil Sands Extraction, level of involvement >=10%	The company derives revenue from the extraction of oil sands.

6. **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.

Indicator	Definition

Category 5 — Severe Controversies	The event has a severe impact on the environment and society, posing serious business risks to the company. This category represents exceptionally egregious corporate behavior, high frequency of recurrence of incidents, very poor management of sustainability-related risks, and a demonstrated lack of willingness by the company to address such risks.

7. **Civilian Firearms**: Companies involved in the manufacturing and/or retailing of small arms and associated ammunition/components for civilian use are excluded.

Indicator	Definition
Small Arms, Civilian Customers, Assault Weapons, level of involvement >=10%	The company derives revenue from manufacturing and selling small arms to civilian customers.
Manufacture of key components, level of involvement >=10%	The company derives revenue from manufacturing and selling key components of small arms.
Small Arms, Retail and Distribution of Assault Weapons, level of involvement >=10%	The company derives revenue from retailing and/or distribution of small arms.
Firearms Production Maximum Revenue >=10%	The company's reported revenue (or, where not disclosed, maximum estimated revenue) from the production of firearms and small-arms ammunition intended for civilian markets as a percentage of total revenue in its most recently completed fiscal year.
Firearms Retailer Maximum Revenue >=10%	The company's reported revenue (or, where not disclosed, maximum estimated revenue) from the wholesale or retail distribution of firearms or small-arms ammunition intended for civilian use as a percentage of total revenue in its most recently completed fiscal year.

8. **Tobacco**: Companies that are involved in the production, manufacturing, retailing and/or distribution of tobacco and tobacco-related products/services (including vaping, pipes and other related products) are excluded.

Indicator	Definition
Tobacco Production, Level of Involvement >=10%	The company derives revenue from the production of tobacco and tobacco-related products.
Tobacco Production Maximum Revenue Percentage >= 10%	The company derives revenue from the distribution and/or retail sale of tobacco products.
Tobacco products related products/services, level of involvement >= 25%	The company supplies tobacco-related products/services.
Tobacco production maximum revenue >= 10%	The company's reported revenue (or, where not disclosed, maximum estimated revenue)from the production of tobacco products as a percentage of total revenue in its most recently completed fiscal year. Tobacco products include nicotine-containing products, including traditional and alternative tobacco smoking products.
Tobacco retailer maximum revenue >= 25%	The company's reported revenue (or, where not disclosed, maximum estimated revenue) from the retail of tobacco products as a percentage of total revenue in its most recently completed fiscal year. Tobacco products include nicotine-containing products, including traditional and alternative tobacco smoking products.

	Tobacco distributor maximum revenue >= 25%	The company's reported revenue (or, where not disclosed, maximum estimated revenue) from the distribution of tobacco products as a percentage of total revenue in its most recently completed fiscal year. Tobacco products include nicotine-containing products, including traditional and alternative tobacco smoking products.

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 State Street Investment Management 's governance approval process.

H. Data sources and processing

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

Controversial Weapons State Street Investment Management 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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process. 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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process.

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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process.

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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process.

Oil 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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process.

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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process.

Civilian Firearms State Street Investment Management 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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process. Companies are excluded if they appear on either or both of the lists from the two data providers.

Tobacco State Street Investment Management 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 Investment Management determines the parameters that define the screen which are then approved by the firm's governance process. Companies are excluded if they appear on either or both of the lists from the two data providers.

State Street Investment Management receives sustainability 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 sustainability data.

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

I. Limitations to methodologies and data

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. In certain situations where screening data is not available for an issuer, an investee company or a security, the screen provider may, as a proxy, use data relating to a different entity to the issuer or the investee company, which presents a risk 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 screen 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

The Investment Manager, on behalf of the Fund, will invest actively using a proprietary active investment strategy which applies a fundamentally driven and bottom-up research process to identify shares considered to be trading at a discount to the assessed intrinsic value of the company. This opportunity set is used to construct a balanced global portfolio of 30-40 securities which the Investment Manager believes has the potential to provide excess returns. In selecting investments, the Investment Manager will not have any specific geographic or sector focus. The Investment Manager will use an active investment strategy which uses a fundamentally driven and bottom-up research process to identify companies with a dislocation between the intrinsic value of the company and the price of its equity security. This will involve in-depth company and industry research by experienced sector analysts within the Investment Manager which will be applied to evaluate the future cashflow generation of a business and hence determine its intrinsic value. Areas that are typically researched include, inter alia, the overall industry structure, competitive dynamics and growth levels, the company's competitive position, moat (a company's ability to maintain a competitive edge over its competitors) and growth prospects, management's strategy and experience, governance and the financial resilience of the business. The Investment Manager seeks to exploit valuation anomalies in the belief that in the long-term share prices should ultimately reflect a company's intrinsic value and therefore provide excess returns. This research process integrates a review of companies' ESG ratings and other ESG data metrics and as such the Investment Manager integrates Sustainability Risks into the investment process of the Fund

As the Fund is actively managed and seeks to outperform the Index, its holdings will differ from the Index. Non-index securities may be held in the portfolios. The Fund's weighting to securities will be usually set without taking into account the weightings of securities in the Index. The Fund's return will typically differ from and may under-perform, the return of the Index.

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 MSCI World Small Cap Index is a trademark of MSCI Inc.