

State Street SPDR S&P 400 U.S. Mid Cap Leaders UCITS ETF

Website disclosure for an Article 8 fund



A. Overzicht

Het State Street SPDR S&P 400 U.S. Mid Cap Leaders UCITS ETF (“het **Fonds**”) is een indexfonds dat de prestaties volgt van de S&P MidCap 400 Scored & Screened Leaders Index (de “**Index**”). De index aangewezen voor het behalen van de ecologische en sociale kenmerken die door het fonds worden gepromoot.

Het fonds promoot ecologische kenmerken die verband houden met de vermindering van het gebruik van niet-hernieuwbare natuurlijke hulpbronnen door ondernemingen uit te sluiten die bijvoorbeeld betrokken zijn bij thermische steenkool, winning van olie uit teerzanden, schalieolie- en gaswinning, boringen in het noordpoolgebied en kernenergie, elk in overeenstemming met de index. Daarnaast promoot het fonds sociale kenmerken die verband houden met: (i) een betere gezondheid en welzijn door directe beleggingen in ondernemingen die betrokken zijn bij de productie en distributie van tabak uit te sluiten; en (ii) ondersteuning van mensenrechten, arbeidsnormen, milieu en corruptiebestrijding door ondernemingen uit te sluiten die worden geacht de beginselen van het Global Compact van de Verenigde Naties (de “**UNGC**”) niet na te leven.

Hoewel het fonds geen duurzame beleggingsdoelstelling heeft, zal het fonds een minimumaandeel van 15% duurzame beleggingen in de zin van artikel 2, lid 17 van de SFDR aanhouden, op basis van de eigen beoordelingsmethode van de beheerder.

De beleggingsbeheerder en/of de onderbeheerder belegt uit naam van het fonds op basis van de replicatiestrategie, zoals nader beschreven in het hoofdstuk “Investment Objectives and Policies – Index Tracking Funds” van het prospectus, en zal voornamelijk beleggen in de effecten van de index, altijd in overeenstemming met de in het prospectus vermelde beleggingsbeperkingen.

De beleggingsbeheerder hanteert een bindende ESG-methodologie met als doel een portefeuille samen te stellen waarin minstens 90% van de activa van het fonds is belegd in effecten die afgestemd zijn op de door het fonds gepromote ecologische en sociale kenmerken. Het restant (<10%) van de portefeuille, bestaande uit contanten en equivalente middelen die naar het inzicht van de beleggingsbeheerder worden aangehouden, zal niet op de gepromote ecologische en sociale kenmerken afgestemd zijn. Voor zover het fonds financiële derivaten mag gebruiken, zullen deze niet worden gebruikt om de ecologische of sociale kenmerken te bereiken die door het fonds worden gepromoot. Het fonds verbindt zich niet om duurzame beleggingen te verrichten in de zin van de Taxonomieverordening.

Het deel van de portefeuille van het Fonds dat is belegd in effecten die zijn opgenomen in de Index vormt een duurzaamheidsindicator die wordt gebruikt om het bereiken van elk van de ecologische of sociale kenmerken te meten die door het Fonds worden gepromoot.

De duurzaamheidsindicatoren die worden gebruikt om het realiseren van de ESG-criteria van de door het fonds gevolgde index te meten, omvatten: (i) uitsluitingen op basis van bedrijfsactiviteiten, (ii) screening op normen en standaarden, (iii) uitsluitingen op basis van ESG-scores en (iv) belangrijkste ongunstige effecten.

De link naar de methodologie van de Index die de ecologische of sociale kenmerken vastlegt die door het Fonds worden gepromoot, is opgenomen in het Relevante Supplement en wordt hieronder weergegeven.

De gegevensbronnen die worden gebruikt om de relevante ecologische of sociale kenmerken te verkrijgen, staan gedetailleerd beschreven in de methodologie van de Index.

Het risico bestaat dat de indexaanbieder fouten maakt, zoals een onjuiste beoordeling van de screeningscriteria beschreven in het Beleggingsbeleid en/of dat hij onjuiste componenten opneemt en/of juiste componenten niet opneemt in het screeningsproces. Gegevens over duurzaam beleggen kunnen op bepaalde aannames, voorspellingen, prognoses, visies en opinies zijn gebaseerd, die op huidige markttrends of verwachte toekomstige gebeurtenissen gebaseerd kunnen zijn. Gezien de aard van gegevensmodellen, methodologieën en aannames, die in ontwikkeling en innovatief zijn, en de inherente onzekerheid bij het voorspellen van toekomstige gebeurtenissen, kan niet worden gegarandeerd dat de gegevens over duurzaam beleggen altijd nauwkeurig of juist zijn of dat de gegevens over duurzaam beleggen voldoen aan de doelen of vereisten van een specifieke klant of belegger. Bovendien kunnen er gegevens zijn die niet kunnen worden verkregen omdat er geen gegevensbronnen beschikbaar zijn.

State Street Investment Management houdt toezicht op externe leveranciers, waaronder indexaanbieders, in overeenstemming met zijn risicobeheerprogramma voor derden. State Street Investment Management heeft regelmatig contact met indexaanbieders voor serviceniveaubeoordelingen en voert ook gerichte beoordelingen uit van de processen, systemen en systeemcontroles, gegevens, kwaliteitscontroles en IT-beveiliging van de indexaanbieders.

Het engagementbeleid is niet direct geïntegreerd in de beleggingsstrategie van het fonds. Stemmingen bij volmacht en engagementactiviteiten worden uitgevoerd overeenkomstig de bepalingen van het Sustainability Stewardship Service Proxy Voting and Engagement Policy.

Het Fonds heeft de Index aangewezen om de ecologische en sociale kenmerken te bereiken die door het Fonds worden gepromoot. De indexmethodologie omvat doorlopende herzieningen en herwegingen aan het einde van elke maand.

Raadpleeg de methodologie van de S&P MidCap 400 Scored & Screened Leaders Index:
<https://www.spglobal.com/spdji/en/documents/methodologies/methodology-sp-ss-leaders-indices.pdf>



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 have a minimum proportion of 15 % of 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”) as set out in Table 1, Annex 1 of Level 2 of SFDR on sustainability factors through the incorporation of the SASB materiality framework in the Investment Manager’s proprietary ESG Score and the application of the exclusions in the Index. By investing in securities classified as “Leaders or Outperformers” in accordance with the Investment Manager’s proprietary ESG Score and the application of exclusions to the Index, 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 by applying norms based ESG screens within the index. Specifically, the Fund considers:

- Violation of UNGC Principles
- Exposure to controversial weapons

A sustainable investment, as determined by the Investment Manager, does not include companies that the Investment Manager has deemed to violate UNGC principles. 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 non-renewable natural resource utilisation by excluding companies involved in, for example, thermal coal, oil sands, shale oil and gas, arctic drilling and nuclear, each in line with the Index.

In addition, the Fund promotes social characteristics related to:

- Better health and wellbeing by excluding direct investment in companies involved in production and distribution of tobacco; and
- Support for human rights, labour, environment and anti-corruption by excluding companies deemed to have failed to comply with the United Nations’ Global Compact (the “UNGC”) principles.

The definition of “involved” in relation to each activity is 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 Index methodology. Further detail on the exclusions applied to promote environmental and/or social characteristics can be found in the methodology of the Index.



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 equity performance of the 400 mid cap companies in the U.S. equity market by market capitalisation, known as the S&P MidCap 400 Index (the "**Standard Index**"), while excluding companies based on certain ESG characteristics as outlined below.

The Index excludes companies from the Standard Index based on their involvement in certain controversial business activities (including controversial weapons, small arms, military contracting, coal, thermal coal, oil sands, shale oil and gas, Arctic drilling, nuclear, tobacco, alcohol) as determined by the index provider as outlined in the Index methodology (the "**Exclusions**"). Thereafter the Index selects the top 50% of the float-adjusted market capitalization of each Global Industry Classification Standard (GICS) Industry Group within the Standard Index (minus the Exclusions), based on each company's S&P Global ESG Score.

The S&P Global ESG score measures a company's performance on and management of material ESG risks, opportunities, and impacts informed by a combination of company disclosures, media and stakeholder analysis, modelling approaches, and in-depth company engagement. For more information on S&P Global ESG scores, please refer to the S&P Global ESG Scores Methodology: https://portal.s1.spglobal.com/survey/documents/spglobal_esg_scores_methodology.pdf

Companies deemed not in violation by the Index provider of the UNGC principles are considered to exhibit good governance.



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. It is intended that, within such portion of the portion, at least 15% of the Fund's assets are invested in securities which are sustainable investments with environmental and / or social objectives, at the point of rebalance of the portfolio which typically occurs on an annually basis. The Fund may hold 10% of its assets in cash or cash equivalents and derivatives used for currency hedging and efficient portfolio management purposes. Such assets will not be aligned with environmental and social characteristics, nor will there be any environmental or social safeguards in place.

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



F. Monitoring of environmental or social characteristics

The sustainability indicators used to measure attainment of the ESG criteria of the Index tracked by the Fund includes (i) Business activity exclusions, (ii) Norms and standards screening, (iii) ESG score based exclusions, and (iv) Principal adverse impacts, and (v) sustainable investment criteria which are detailed in the SFDR Annex of the Fund.

The Fund rebalances on an annual 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 S&P MidCap 400 Scored & Screened Leaders Index. The Index has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.

The Index methodology provides for ongoing review and rebalances on annually.

Please refer to S&P MidCap 400 Scored and Screened Leaders Index methodology:

<https://www.spglobal.com/spdji/en/documents/methodologies/methodology-sp-ss-leaders-indices.pdf>

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