State Street S&P Euro Dividend Aristocrats Screened UCITS ETF
Website disclosure for an Article 8 fund

A. Tiivistelmä

State Street SPDR S&P U.S. Dividend Aristocrats Screened UCITS ETF (”**rahasto**”) on indeksirahasto, joka seuraa S&P High Yield Dividend Aristocrats Screened Index -indeksin (”**indeksi**”) kehitystä. Indeksi on nimetty vertailuarvoksi rahaston edistämien ympäristöön tai yhteiskuntaan liittyvien ominaisuuksien toteutumiseksi. Rahaston edistämät ympäristöön ja yhteiskuntaan liittyvät ominaisuudet toteutuvat rahastolle nimetyn indeksin kautta. Niitä ovat tiettyjen osakkeiden poissulkeminen ESG-ominaisuuksien perusteella ottamalla huomioon sekä yritysten ESG-luokitukset että osallistuminen tiettyihin kiistanalaisiin liiketoiminta-alueisiin, kuten indeksimenetelmässä on esitetty.

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

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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.

Information Classification: General

Indeksiin sisältyviin arvopapereihin sijoitettu osuus rahaston salkusta muodostaa kestävyysindikaattorin, jota käytetään mittaamaan kunkin rahaston edistämän 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 seulontakriteerejä ja/tai sisällyttää indeksiin seulontaprosessin myötä vääriä / sulkea pois oikeita osatekijöitä. Kestävään sijoittamiseen liittyvät tiedot saattavat pohjautua tiettyihin olettamuksiin, ennusteisiin, ennakointeihin, näkemyksiin ja mielipiteisiin, jotka voivat perustua tämänhetkisiin markkinasuuntauksiin tai odotettuihin tuleviin tapahtumiin. Tietomallien, menetelmien ja olettamusten 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. Indeksimenetelmä sisältää jatkuvan arvioinnin, ja indeksi painotetaan uudelleen tammikuun viimeisenä pankkipäivänä.

Lisätietoja on S&P High Yield Dividend Aristocrats Screened Index -menetelmäkuvauksessa:

https://www.spglobal.com/spdji/en/documents/methodologies/methodology-sp-da-screened-indices.pdf

B. No sustainable investment objective

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

Information Classification: General

C. Environmental or social characteristics of the financial product

The State Street SPDR S&P Euro Dividend Aristocrats Screened UCITS ETF is an index fund tracking the performance of the S&P Euro High Yield Dividend Aristocrats Screened Index (the "**Index**"). The Index has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund. The Index represents the performance of certain high dividend-yielding equity securities issued by companies from within the Eurozone while excluding certain stocks based on their ESG characteristics considering both their ESG rating, and their involvement in certain controversial business activities 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 high dividend-yielding stocks from the Eurozone equity market that meet the eligibility criteria defined in the S&P Euro High Yield Dividend Aristocrats Index, (the **"Standard Index**"). In addition, the Index aims to exclude certain stocks based on their ESG characteristics considering both their ESG rating, and their involvement in certain controversial business activities as outlined in the index methodology. The remaining securities are then weighted according to the size of their dividend.

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 not in violation by the Index provider of the UNGC principles are considered to exhibit good governance. For information on the methodologies used in the construction of the Index and further information on the exclusion criteria and data sources, please refer to S&P's index methodology description which can be found at the following link: https://www.spglobal.com/spdji/en/documents/methodologies/methodology-sp-da-screened-indices.pdf

Information Classification: General

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 Index represents the performance of certain high dividend-yielding equity securities issued by companies from within the Eurozone while excluding certain stocks based on their ESG characteristics considering both their ESG rating, and their involvement in certain controversial business activities. Consequently, the attainment of the associated environmental and social characteristics is measured through the Index exclusions of companies that are associated with controversial weapons, thermal coal, tobacco products, oil sands, small arms and military contracting and the companies that fail to comply with the UNGC principles.

As such, the Fund does not intend to hold any securities that do not meet the relevant ESG criteria above.

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.

Information Classification: General

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.

Information Classification: General

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 ESG High Yield Dividend Aristocrats 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 via the adoption of screens to exclude securities related to certain sectors, companies or practices, based on specific ESG criteria .

The Index methodology provides for ongoing review and rebalances on the last business day of January.

Please refer to S&P Euro High Yield Dividend Aristocrats Screened Index methodology:

https://www.spglobal.com/spdji/en/documents/methodologies/methodology-sp-da-screened-indices.pdf

Information Classification: General

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