# SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF

Supplement No.61

(A sub-fund of SSGA SPDR ETFs Europe I plc (the "Company") an open-ended investment company constituted as an umbrella fund with segregated liability between sub-funds authorised by the Central Bank of Ireland pursuant to the UCITS Regulations).

This Supplement (the "Supplement") forms part of the Prospectus dated 22 December 2023 as amended from time to time (the "Prospectus") in relation to the Company. This Supplement should be read together with the Prospectus and Packaged Retail and Insurance-based Investment Product document ("PRIIPs KID") or Key Investor Information Document ("KIID"). It contains information relating to the SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF (the "Fund") which is represented by the SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF series of shares in the Company (the "Shares").

All Shares in this Fund have been designated as ETF Shares. Unless otherwise defined herein or unless the context otherwise requires, all defined terms used in this Supplement shall bear the same meaning as in the Prospectus.

Prospective investors should review the entire Supplement, Prospectus and PRIIPs KID or KIID carefully. If you have any questions, you should consult your stockbroker or financial adviser. Potential investors should consider the risk factors set out in the Prospectus and in this Supplement before investing in this Fund. The Company and the Directors listed in the "Management" section of the Prospectus, accept responsibility for the information contained in this Supplement.



Base Currency	EUR			
Investment Manager	State Street Global Advisors Europe Limited. State Street Global Advisors Limited.			
Sub-Investment Manager(s)				
French PEA Eligible	Yes			
Dividend Policy	For distributing share classes, semi-annual distribution of income (in or around March and September), except where the Management Company in its sole discretion, determines not to pay a dividend on any given distribution date. For accumulating share classes, all income and gains will be accumulated in the Net Asset Value per Share.  Distributing / accumulating status indicated in Share class information overleaf.			
SFDR Fund Classification	Article 8 Fund, Sustainability Risk integrated by the Index			
Dealing Information				
Dealing Deadline	Cash subscriptions and redemptions: 2.30 p.m. (Irish time) on each Dealing Day. In-kind subscriptions and redemptions: 4.00 p.m. (Irish time) on each Dealing Day. For all subscriptions and redemptions on the last Dealing Day prior to 25 December and 1 January each year: 11.00 a.m. (Irish time). Earlier or later times may be determined by the Management Company at its discretion with prior notice to the Authorised Participants.			
Settlement Deadline	3.00 p.m. (Irish time) on the second Business Day after the Dealing Day, or such earlier or later date as may be determined by or agreed with the Management Company. The Management Company/Company will notify Shareholders if, (i) an earlier Settlement Deadline applies in respect of subscriptions, or (ii) a later Settlement Deadline applies in respect of redemptions. Settlement may be impacted by the settlement schedule of the underlying markets.			
Dealing NAV	The Net Asset Value per Share calculated as at the Valuation Point on the relevant Dealing Day.			
Minimum Subscription and Redemption Amount	Authorised Participants should refer to the Authorised Participant Operating Guidelines for details of the current minimum subscription and redemption amounts for the Fund.			
Index Information				
Index (Ticker)	S&P Euro ESG High Yield Dividend Aristocrats Index (SPEHDAEN)			
Index Rebalance Frequency	Quarterly.			
Additional Index Information	Further details of the Index and its performance can be found at https://www.spglobal.com/spdji/en/indices/dividends-factors/sp-euro-esg-high-yield-dividend-aristocrats-index/%23overview https://www.spglobal.com/spdji/en/supplemental-data/europe/			
Valuation Information				
Valuation	The Net Asset Value per Share is calculated in accordance with the "Determination on Net Asset Value" section of the Prospectus.			

Valuation Pricing Used

Last Traded.

Valuation Point

6.45 p.m. (Irish time) on each Business Day.

#### **Share Classes**

Share Class Type	EUR unhedged			
Name	SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF			
Dividend Policy*	Dist	Acc		
Share Class Currency	EUR			
Index Ticker	SPEHDAEN			
TER (further information in this respect is set out in the "Fees and Expenses" section of the Prospectus)	ct is set out in the "Fees Up to 0.30% (xpenses" section of the			

<sup>\*</sup>Dividend Policy: 'Dist' = Distributing shares, 'Acc' = Accumulating shares

#### **Investment Objective and Policy**

**Investment Objective:** The objective of the Fund is to track the performance of certain high dividend-yielding equity securities issued by companies from within the Eurozone

**Investment Policy:** 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.

At least 90% of the Fund's assets are invested in securities that are constituents of the Index, while the Index provider applies ESG ratings on all of the Index constituents. The Index excludes at least 20% of the least well-rated securities compared to the Standard Index universe, so it is therefore expected that the Fund's resulting ESG rating will be higher than the ESG rating of a fund tracking the Standard Index.

Index constituents may on occasion be rebalanced more often than the Index Rebalance Frequency, if required by the Index methodology, including for example where corporate actions such as mergers or acquisitions affect components of the Index.

The adoption of screens within the Index correspond to the environmental and social factors which the Fund promotes, as further described in the "ESG Screening" subsections of the "ESG Investing" section of the Prospectus. Companies deemed by the Index provider not to be very poor performers in relation to the UN Global Compact principles are considered to exhibit good governance. The main methodological limits are described in the "Screening Risk" subsection of the "Investment Risks" section of this Supplement.

Although the Index is generally well diversified, because of the market it reflects it may, depending on market conditions, contain constituents issued by the same body that may represent more than 10% of the Index. In order for the Fund to track the Index accurately, the Fund will make use of the increased diversification limits available under Regulation 71 of the UCITS Regulations. These limits permit the Fund to hold positions in individual constituents of the Index issued by the same body of up to 20%.

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. The Investment Manager and/or Sub-Investment Manager also may, in exceptional circumstances, invest in securities not included in the Index but that it believes closely reflect the risk and distribution characteristics of securities of the Index. In such case, the application of an ESG rating to these selected securities cannot be guaranteed. The equity securities in which the Fund invests will be primarily listed or traded on Recognised Markets in accordance with the limits set out in the UCITS Regulations. Details of the Fund's portfolio and the indicative net asset value per Share for the Fund are available on the Website daily.

As at the date of this Supplement the Investment Manager and/or Sub-Investment Manager consider the principal adverse impacts of its investment decisions at the Fund level in order to seek to reduce negative externalities that may be caused by its underlying investments

This Fund promotes environmental or social characteristics in accordance with SFDR Article 8. More information about the environmental and social characteristics can be found in the annex to this Supplement.

Taxonomy Regulation. While this Fund promotes environmental characteristics within the meaning of Article 8 of the SFDR, it does not currently commit to investing in any "sustainable investment" within the meaning of the Taxonomy Regulation. The "do no significant harm" principle applies only to those investments underlying the Fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this Fund do not take into account the EU criteria for environmentally sustainable economic activities. The Fund does not commit to invest more than 0% of its Net Asset Value in Taxonomy-aligned investments.

#### **Permitted Investments**

**Equities:** The securities in which the Fund invests may include equities, or equity-related securities such as American Depositary Receipts (ADRs) or Global Depositary Receipts (GDRs). ADRs and GDRs are typically used instead of local shares, where owning the local shares represented in the Index is not possible or prohibitively expensive.

Other Funds / Liquid Assets: The Fund may invest up to 10% of its net assets in other regulated open-ended funds (including Money Market Funds) where the objectives of such funds are consistent with the objective of the Fund and where such funds are authorised in member states of the EEA, United Kingdom, USA, Jersey, Guernsey or the Isle of Man and where such funds comply in all material respects with the provisions of the UCITS Regulations. The Fund may hold ancillary liquid assets such as deposits in accordance with the UCITS Regulations.

**Derivatives:** The Fund may, for efficient portfolio management purposes only, use financial derivative instruments ("**FDIs**"). Any use of FDIs by the Fund shall be limited to futures. Efficient portfolio management means investment decisions involving transactions

that are entered into for one or more of the following specific aims: the reduction of risk; the reduction of cost; the generation of additional capital or income for the Fund with an appropriate level of risk, taking into account the risk profile of the Fund; or the minimisation of tracking error, i.e. the risk that the Fund return varies from the Index return. FDIs are described in the "Investment Objectives and Policies – Use of Financial Derivative Instruments" section of the Prospectus.

# Securities Lending, Repurchase Agreements & Reverse Repurchase Agreements

The Fund does not currently participate in a securities lending programme, though it is entitled to do so. The Fund also does not intend to engage in repurchase agreements and reverse repurchase agreements. Should the Directors elect to change this policy in the future, due notification will be given to Shareholders and this Supplement will be updated accordingly.

#### **Investment Risks**

Investment in the Fund carries with it a degree of risk. Investors should read the "Risk Information" section of the Prospectus. In addition, the following risks are particularly relevant for the Fund.

Index Tracking Risk: The Fund's return may not match the return of the Index. It is currently anticipated that the Fund will track the Index with a potential variation of up to 1% annually under normal market conditions. The Fund's ability to track the Index will be affected by Fund expenses, the amount of cash and cash equivalents held in its portfolio, and the frequency and the timing of purchases and sales of interests in the Fund. The Investment Manager and/or Sub-Investment Manager may attempt to replicate the Index return by investing in a sub-set of the securities in the Index, or in some securities not included in the Index, potentially increasing the risk of divergence between the Fund's return and that of the Index.

Liquidity Risk & ETF Liquidity Risk: Lack of a ready market or restrictions on resale may limit the ability of the Fund to sell a security at an advantageous time or price or at all. Illiquid securities may trade at a discount from comparable, more liquid investments and may be subject to wide fluctuations in market value. Illiquidity of the Fund's holdings may limit the ability of the Fund to obtain cash to meet redemptions on a timely basis. Where the fund invests in illiquid securities or does not trade in large volumes, the bid offer spreads of the Fund may widen, the Fund may be exposed to increased valuation risk and reduced ability to trade. Shares in the Fund may also trade at prices that are materially different to the last available NAV.

Concentration Risk: When the Fund focuses its investments in a particular currency or a small number of stocks or region, the financial, economic, business, and other developments affecting issuers in that currency or small number of stocks or region will have a greater effect on the Fund than if it was more diversified. This concentration may also limit the liquidity of the Fund. Investors may buy or sell substantial amounts of the Fund's shares in response to factors affecting or expected to affect a currency or

small number of stocks or region in which the Fund focuses its investments.

Derivatives Risk: The Fund may use FDIs for efficient portfolio management purposes as described in the derivatives section under Permitted Investments above. The Fund's use of FDIs involves risks different from, and possibly greater than, the risks associated with investing directly in securities.

Screening Risk: 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. ESG scoring and screening is subject to inherent methodological limits. Any assessment of ESG 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 ESG performance. In particular there may be potential inconsistencies, inaccuracy or a lack of availability of required ESG 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 ESG data to be processed; and
- The identification of relevant factors for the ESG analysis.

Integrating Sustainability Risk: The integration of Sustainability Risk by the Index does not assure the mitigation of any or all Sustainability Risk. Any deterioration in the financial profile of an underlying investment affected by a Sustainability Risk may have a corresponding negative impact on the Net Asset Value and/or performance of the investing Fund.

SFDR - Fund Classification Risk: The SFDR has phased implementation from 10 March 2021 and imposes new disclosure obligations on financial market participants. As at the date of this Prospectus, the implementing Regulatory Technical Standards (Level 2) for SFDR have been enacted by the European Commission and will apply from 1 January 2023, but certain concepts introduced by SFDR are not currently the subject of centralised implementing standards, local guidance or established market practice. The Fund has been assessed and classified in good faith based on the relevant information currently available. As these standards and guidance develop, the SFDR related disclosures and the Article 8 classification indicated in this Supplement and on the Website are subject to change and may no longer apply.

#### **Investor Profile**

The typical investors of the Fund are expected to be institutional, intermediary and retail investors who want to take medium or long term exposure to the performance of high-yielding Eurozone equities and are prepared to accept the risks associated with an

investment of this type, including the expected high volatility of the Fund.

#### **Subscriptions, Redemptions & Conversions**

Investors may subscribe for or redeem Shares in the Fund on each Dealing Day at the Dealing NAV with an appropriate provision for Duties and Charges and in accordance with the provisions in the "Purchase and Sale Information" section of the Prospectus.

For subscriptions, consideration, in the form of cash or cleared in kind securities, must be received by the Settlement Deadline. For redemptions, a written redemption request signed by the Shareholder is required to be received by the Administrator by the Dealing Deadline on the relevant Dealing Day.

Shareholders should refer to the terms of the "Purchase and Sale Information" section of the Prospectus for information on Share conversions.

#### **Initial Offer Period**

Shares in the following Share Classes of the Fund will be issued at the Dealing NAV:

SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF (Dist)

Shares of the Fund which are not launched as at the date of this Supplement will be available from 9.00 a.m. (Irish time) on 29 May 2024 to 3.00 p.m. (Irish time) on 28 November 2024 or such earlier or later date as the Directors may determine and notify to the Central Bank (the "Initial Offer Period"). The initial offer price will be approximately 20 in the currency of the respective share class, plus an appropriate provision for Duties and Charges, or such other amount as determined by the Investment Manager and/or Sub-Investment Manager and communicated to investors prior to investment. Following the closing date of the Initial Offer Period, the Shares will be issued at the Dealing NAV.

#### **SFDR Annex**

#### ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Does this financial product have a sustainable investment objective?

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that investee companies follow good governance

practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name**: SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF (the "Fund")

Legal entity identifier: 549300T41OSJYVV1LD06

#### **Environmental and/or social characteristics**

Does this intalicial product have a sustainable investment objective:					
••		Yes	• •	×	No
	inve	I make a minimum of sustainable stments with an environmental ctive:%		chara objec	promotes Environmental/ Social (E/S) acteristics and while it does not have as its tive a sustainable investment, it will have a num proportion of 0% of sustainable investments
		in economic activities that qualify as environmentally sustainable under the EU Taxonomy			with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
		in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy			with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
					with a social objective
		I make a minimum of sustainable stments with a social objective:			motes E/S characteristics, but will not make any inable investments

What environmental and/or social characteristics are promoted by this financial product?

The SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF is an index fund tracking the performance of the S&P Euro ESG High Yield Dividend Aristocrats 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.



7

Sustainability
indicators measure
how the
environmental or
social characteristics
promoted by the
financial product are
attained.

**Principal** 

significant

investment

environmental,

impacts

relating

matters,

human

corruption

bribery matters.

and

impacts are the most

on sustainability factors

riahts.

and

adverse

negative

decisions

employee

respect for

social

anti-

anti-

of

Sustainability
ndicators measure
now the

Description montal

The Index represents the performance of certain high-dividend yielding equity securities issued by

The provisor montal and the performance of certain high-dividend yielding equity securities issued by

The provisor montal and the performance of certain high-dividend yielding equity securities issued by

The provisor montal and the performance of certain high-dividend yielding equity securities issued by

The provisor montal and the performance of certain high-dividend yielding equity securities issued by

The provisor montal and the performance of certain high-dividend yielding equity securities issued by

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.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The Fund does not commit to investing in sustainable investments.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not applicable

accompanied by specific EU criteria.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

Y

Yes

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.

8

Specifically, the Fund considers:

- Violation of UNGC Principles
- Exposure to controversial weapons

No



#### What investment strategy does this financial product follow?

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.



Good

sound

staff

practices

structures,

employee

remuneration

compliance.

and

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The investment policy of the Fund is to track the performance of the Index. At least 90% of the Fund's assets are invested in securities that are constituents of the Index, while the Index provider applies ESG ratings on all the Index constituents.

Environmental and social characteristics are promoted via the adoption of screens to exclude securities related to certain sectors, companies or practices, based on specific ESG criteria.



## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The Fund excludes investments in issuers as set out in the investment strategy and binding requirements outlined above, however the Fund does not have a committed minimum rate to reduce the scope of investments.



#### What is the policy to assess good governance practices of the investee companies?

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-esg-divarist-indices.pdf



#### What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

governance

management

relations,

∩f

tax

include

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 efficient portfolio management purposes, at the Investment Manager's discretion, which would be classified under #2 Other in the below table. Such assets will not be aligned with environmental and social characteristics, nor will there be any environmental or social safeguards in place.

#### SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF

Taxonomy-aligned activities are expressed as a share of:

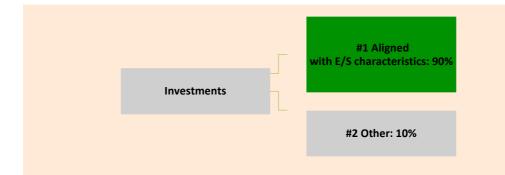
turnover reflecting the share of revenue from green activities of investee companies

# capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy. operational

green economy.

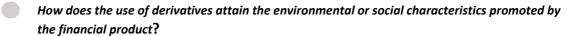
operational

expenditure (OpEx)
reflecting green
operational activities
of investee
companies.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#20ther** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.



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



# To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

While this Fund promotes environmental characteristics within the meaning of Article 8 of the SFDR, it does not currently commit to investing in any "sustainable investment" within the meaning of the Taxonomy Regulation. Therefore, the Fund does not commit to invest more than 0% of its Net Asset Value in Taxonomy Regulation aligned investments. It should therefore be noted that this Fund does not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and, as such, its portfolio alignment with the Taxonomy Regulation is not calculated. For this reason, the "do no significant harm" principle does not apply to any of the investments of this Fund.

Therefore, there is no intentional alignment with the Taxonomy Regulation.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?<sup>1</sup>

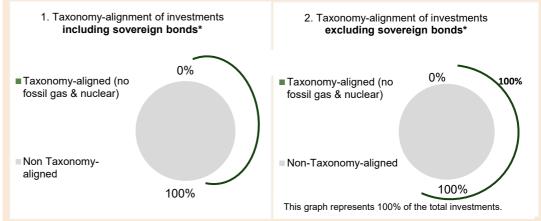
	Yes:	
	In fossil gas	In nuclear energy
✓	No	

<sup>&</sup>lt;sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulations (EU) 2022/1214.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional** activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

What is the minimum share of investments in transitional and enabling activities?

The Fund does commit to a minimum share of investments in transitional and enabling activities.



are sustainable investments

do

into

FU

activities

with an environmental

take

account the criteria

the

that

environmentally

objective

sustainable

economic

Taxonomy.

under

not

for

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Fund does not commit to investing in Sustainable Investments.



What is the minimum share of socially sustainable investments?

Not applicable.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

The Fund may hold a portion of its assets in cash or cash equivalents and derivatives used for efficient portfolio management purposes, at the Investment Manager's discretion, which would be classified under #2 Other in the above table. Such assets will not be aligned with environmental and social characteristics, nor will there be any environmental or social safeguards in place.



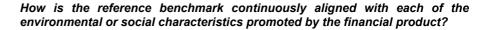
Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The Fund tracks the performance of the S&P Euro ESG High Yield Dividend Aristocrats 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.

#### Reference

benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



The Index methodology provides for quarterly review and rebalance.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

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

#### How does the designated index differ from a relevant broad market index?

The designated index implements exclusions and changes to Index weights, versus the relevant broad market index, that are a function of company ESG characteristics, considering both ESG ratings and involvement in certain controversial business activities, as applied by the Index provider, S&P Dow Jones Indices LLC ("SPDJI"). For information on the Index methodology used in the construction of the Index and further information on the exclusion criteria and data sources, please refer to SPDJI's index methodology description.

### Where can the methodology used for the calculation of the designated index be found?

S&P's index methodology description can be found at the following link: https://www.spglobal.com/spdji/en/documents/methodologies/methodology-sp-esg-divarist-indices.pdf.

Where can I find more product specific information online?

More product-specific information can be found on the website:

Investing in SPDR Exchange Traded Funds (ETFs) (ssga.com)



#### SPDR S&P Euro Dividend Aristocrats ESG UCITS ETF

THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF IS NOT SPONSORED, ENDORSED, SOLD OR PROMOTED BY S&P DOW JONES INDICES LLC, ITS AFFILIATES, AND/OR THIRD PARTY LICENSORS (COLLECTIVELY, "S&P"). S&P MAKES REPRESENTATION, CONDITION OR WARRANTY, EXPRESS OR IMPLIED, TO THE OWNERS OF THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF OR ANY MEMBER OF THE PUBLIC REGARDING THE ADVISABILITY OF INVESTING IN SECURITIES GENERALLY OR IN THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF PARTICULARLY OR THE ABILITY OF THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX TO TRACK MARKET PERFORMANCE AND/OR TO ACHIEVE ITS STATED OBJECTIVE AND/OR TO FORM THE BASIS OF A SUCCESSFUL INVESTMENT STRATEGY, AS APPLICABLE. S&P'S ONLY RELATIONSHIP TO STATE STREET CORPORATION ("STATE STREET") IS THE LICENSING OF CERTAIN TRADEMARKS AND TRADE NAMES AND OF THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX WHICH IS DETERMINED, COMPOSED AND CALCULATED BY S&P WITHOUT REGARD TO STATE STREET OR THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF. S&P HAS NO OBLIGATION TO TAKE THE NEEDS OF STATE STREET OR THE OWNERS OF OR INVESTORS IN THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF INTO CONSIDERATION IN DETERMINING, COMPOSING OR CALCULATING THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX OR ANY DATA INCLUDED THEREIN OR USED TO CALCULATE THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX. S&P IS NOT AN ADVISOR TO THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF AND IS NOT RESPONSIBLE FOR AND HAS NOT PARTICIPATED IN THE DETERMINATION OF THE PRICES AND AMOUNT OF THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF OR THE TIMING OF THE ISSUANCE OR SALE OF THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF OR IN THE DETERMINATION OR CALCULATION OF THE EQUATION BY WHICH THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF SHARES ARE TO BE CONVERTED INTO CASH. S&P HAS NO OBLIGATION OR LIABILITY IN CONNECTION WITH THE ADMINISTRATION, MARKETING, OR TRADING OF THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF. INCLUSION OF A SECURITY WITHIN AN INDEX IS NOT RECOMMENDATION TO BUY, SELL, OR HOLD SUCH SECURITY, NOR IS IT CONSIDERED TO BE INVESTMENT ADVICE.

S&P DOES NOT GUARANTEE THE ACCURACY AND/OR THE COMPLETENESS OF THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX OR ANY DATA INCLUDED THEREIN OR USED TO CALCULATE THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX AND S&P SHALL HAVE NO LIABILITY FOR ANY ERRORS, OMISSIONS, OR INTERRUPTIONS THEREIN. S&P MAKES NO REPRESENTATION, WARRANTY OR CONDITION, EXPRESS OR IMPLIED, AS TO RESULTS TO BE OBTAINED BY STATE STREET, OWNERS OF OR INVESTORS IN THE SPDR S&P EURO DIVIDEND ARISTOCRATS ESG UCITS ETF, OR ANY OTHER PERSON OR ENTITY FROM THE USE OF THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX OR ANY DATA INCLUDED THEREIN OR USED TO CALCULATE THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX. S&P MAKES NO EXPRESS OR IMPLIED WARRANTIES OR CONDITIONS, REPRESENTATIONS, EXPRESSLY DISCLAIMS ALL WARRANTIES OR CONDITIONS OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE AND ANY OTHER EXPRESS OR IMPLIED WARRANTY OR CONDITION WITH RESPECT TO THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX OR ANY DATA INCLUDED THEREIN. WITHOUT LIMITING ANY OF THE FOREGOING, IN NO EVENT SHALL S&P HAVE ANY LIABILITY FOR ANY SPECIAL, PUNITIVE, INDIRECT, OR CONSEQUENTIAL DAMAGES (INCLUDING, BUT NOT LIMITED TO, LOST PROFITS) RESULTING FROM THE USE OF THE S&P EURO ESG HIGH YIELD DIVIDEND ARISTOCRATS INDEX OR ANY DATA INCLUDED THEREIN, EVEN IF NOTIFIED OF THE POSSIBILITY OF SUCH DAMAGES.

As of the date of this Supplement the Fund uses (within the meaning of the Benchmark Regulation) the following SPDJI benchmark:

S&P Euro ESG High Yield Dividend Aristocrats Index

As of the date of this Supplement, SPDJI is listed on the ESMA Register referred to in Article 36 of the Benchmark Regulation as an administrator endorsed pursuant to Article 33 of the Benchmark Regulation.

"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.