
If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant or other independent financial adviser.

The Directors of the Manager whose names appear under the heading “Directory” in the prospectus of the Fund dated 3 August 2021 (the “Prospectus”) accept responsibility for the information contained in the Prospectus and in this Supplement. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) the information contained in the Prospectus and in this Supplement is in accordance with the facts and does not omit anything likely to affect the import of the information.

STATE STREET SPECTRUM UNIT TRUST

SUPPLEMENT

STATE STREET SPECTRUM GROWTH FUND

This Supplement contains information relating to Units of the State Street Spectrum Growth Fund (the “Sub-Fund”), which is a separate Sub-Fund of the State Street Spectrum Unit Trust (the “Fund”).

The date of this Supplement is 3 August 2021.

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DEFINITIONS

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.

“Business Day”, a day that banks are open in Dublin and/or such other day or days as the Manager may determine and notify in advance to Unitholders.

“Sub-Investment Manager”, means State Street Global Advisors Limited.

“Valuation Point”, the close of business in the relevant markets on the Dealing Day.

INTRODUCTION

The State Street Spectrum Unit Trust (the “Fund”) is authorised in Ireland by the Central Bank. The Fund is structured as an umbrella fund in that it may be divided into different classes of units (“Units”) with one or more classes representing a separate sub-fund of the Fund.

This Supplement contains information relating to the Units of the State Street Spectrum Growth Fund (the “Sub-Fund”) to be issued in accordance with the Prospectus and this Supplement. This Supplement forms part of and should be read in the context of and together with the general description of the Fund contained in the current Prospectus together with the most recent audited annual report and accounts and, if published after such report (or if the first such report has not been issued), a copy of the latest unaudited semi-annual report.

At the date of this Supplement, separate classes of Units in the Sub-Fund have not been created, but separate classes of Units may be created in the future in accordance with the requirements of the Central Bank.

INVESTMENT OBJECTIVES AND POLICIES

The investment objective of the Sub-Fund is primarily to seek to generate capital appreciation while maintaining a high level of risk control.

This is to be achieved primarily by investing in the sub-funds of the Underlying Fund.

The Investment Manager and / or the Sub-Investment Manager may use the foreign exchange market to hedge some or all of the non-euro exposure in the underlying funds.

The Sub-Fund may also use for efficient portfolio management purposes only repurchase and reverse repurchase agreements and derivatives including currency forward contracts, options, interest rate swaps, and futures.

Investments will be made principally as fund of fund or Feeder Fund Investments in sub-funds of the Underlying Fund. The Sub-Fund may invest up to 65% of its Net Asset Value in State Street GRU World Ex Euro Index Equity Fund and up to 50% of its Net Asset Value in each of State Street GRU Euro Index Equity Fund, State Street GRU EMU Bond Index Fund and State Street GRU Euribor Plus Fund.

The Sub-Fund may also achieve its investment objective by investing on a fund of fund basis up to 35% of its Net Asset Value in other Regulated Funds, and by investing up to 10% of its Net Asset Value in Unregulated Funds.

Details of the investment objectives and policies of the sub-funds of the Underlying Fund are contained in Appendix III of the Prospectus.

The base currency of the Sub-Fund is Euro.

Risk Management and Leverage

Although the Sub-Fund may be leveraged as a result of its use of financial derivative instruments (“FDI”) and efficient portfolio management techniques, the Sub-Fund’s resulting global exposure will not exceed its total net assets, i.e., the Sub-Fund may not be leveraged in excess of 100% of its Net Asset Value.

The Sub-Fund’s global exposure and leverage is calculated using the commitment approach. This approach converts the Sub-Fund’s FDI positions into the equivalent positions in the underlying assets, and seeks to ensure that the FDI risk is monitored in terms of any future “commitments” to which it is (or may be) obligated. Investors should refer to the “Derivatives Risk” section in the Prospectus for information in relation to the risks associated with the use of FDI. The Investment Manager and / or the Sub-Investment Manager employs a risk management process in respect of the Sub-Fund which enables it to accurately measure, monitor and manage the various risks associated with FDI, the use of efficient portfolio management techniques and the management of collateral. The Investment Manager and / or the Sub-Investment Manager will employ only FDI that are covered by a risk management process that has been cleared by the Central Bank. In the event of the Sub-Fund proposing to use additional types of FDI, the risk management process and this supplement will be amended to reflect this intention.

SFDR FUND CLASSIFICATION

SFDR Fund Classification: The integration of Sustainability Risk is not relevant for this Sub -Fund / neither Article 8 nor Article 9.

In light of the investment policy of the Sub-Fund, Sustainability Risk has not been integrated into the Sub-Fund’s investment process. 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 Sub-Fund. Where a Sustainability Risk event occurs, this Sub-Fund may be more impacted than an equivalent Fund that integrates Sustainability Risk.

INVESTMENT AND BORROWING RESTRICTIONS

The investment and borrowing restrictions set out in the Prospectus apply in their entirety to the Sub-Fund.

EXPOSURE TO SECURITIES FINANCING TRANSACTIONS

The Sub-Fund does not currently participate in a securities lending programme, though it is entitled to do so. The Sub-Fund’s exposure to total return swaps and repurchase agreements is as set out below (as a percentage of Net Asset Value). **Should the Directors elect to change this policy in the future, due notification will be given to Unitholders and this Supplement will be updated accordingly.**

	Expected	Maximum
Total Return Swaps	0%	25%
Repurchase Agreements	0%	25%

MANAGEMENT AND ADMINISTRATION

Detailed descriptions of the Manager and other service providers to the Sub-Fund are set out in the Prospectus.

VALUATION OF ASSETS

The Net Asset Value of the Sub-Fund will be calculated by the Administrator as at each Valuation Point in accordance with the requirements of the Trust Deed and full details are set forth under the headings “Valuation, Subscription and Redemptions” and “Statutory and General Information” in the Prospectus. The Net Asset Value of the Sub-Fund will be expressed in its base currency, which is Euro.

SUBSCRIPTIONS

Application Procedure

Application Forms

In order to subscribe for Units of the Sub-Fund, all applicants must complete the application form prescribed by the Manager (the “Application Form”) which sets out the methods by which and to whom the subscription monies should be sent. Application Forms shall be irrevocable (unless otherwise agreed with the Manager) and may be sent by facsimile at the risk of the applicant. The Application Form should be received by the Administrator, by 1.00 p.m. (Irish time) on the Business Day immediately preceding the relevant Dealing Day or such other day as the Directors may determine (provided the application is received before the relevant Valuation Point). If an applicant’s first Application Form is initially submitted by fax or other copy form, the originally executed Application Form should be received by the Administrator within five Business Days after the time for receipt of such application.

Failure to provide the original Application Form by such time may, at the discretion of the Manager, result in the rejection of the application and any monies received will, subject to any applicable laws, be returned to the applicant (minus any handling charge incurred in any such return) by electronic transfer (but without interest, costs or compensation) or in the compulsory redemption of the Units. In any event, no redemption proceeds will be paid until the original Application Form has been received and all anti-money laundering checks completed.

In addition to the Application Form, applicants may be requested to provide other information (e.g. as to identity and corporate authorisation). Failure to provide such information may delay the processing of the application.

Fractions

Fractions of Units will be issued where any part of the subscription monies for Units represents less than the Net Asset Value per Unit, provided however, that fractions shall not be less than .01 of a Unit.

Subscription monies, representing less than .01 of a Unit will not be returned to the applicant but will be retained by the Sub-Fund in order to defray administration costs.

Pricing

All subscriptions will be dealt on a “forward” pricing basis, i.e. by reference to the Net Asset Value per Units calculated as at the Valuation Point for the relevant Dealing Day. Any Application Forms received after the relevant time for receipt will normally be held over until the next Dealing Day but may be accepted for dealing on the Dealing Day, if received prior to the Valuation Point for that Dealing Day (at the discretion of the Manager).

Payment of Subscription Monies

Method and Currency of Payment

Subscription payments net of all bank charges must be made in Euro (unless otherwise agreed with the Manager) and should be paid by electronic transfer to the bank account specified in the Application Form. Other methods of payment are subject to the prior approval of the Manager with the agreement of the Administrator. No interest will be paid in respect of payments received in circumstances where the application is held over to the next Dealing Day. The Fund may accept payment in currencies other than the base currency in which the units are denominated and in such event, the Manager will arrange for conversion of the subscription monies into such other currency. This may delay the processing of any such application. The cost and risk of converting currency will be borne by the applicant.

Timing of Payment

Payment in respect of subscriptions must be received in cleared funds on the second Business Day following the relevant Dealing Day or on such other day as the Directors may determine.

Payment

If payment in cleared funds in respect of a subscription has not been received by the time specified above, any allotment of Units made in respect of such application may be cancelled. In the event of the non-clearance of subscription monies, any allotment in respect of an application may be cancelled. In either event and notwithstanding cancellation of the application, the Manager may charge the applicant for any expense incurred by it or the Fund or for any loss to the Sub-Fund arising out of such non-receipt or non-clearance plus an administration fee may be payable to the Fund. In addition, the Manager will have the right to sell all or part of the applicant's holding of Units in the relevant class or any other Sub-Fund in order to meet those charges.

Minimum Subscriptions/Holdings

Initial Subscriptions

The minimum initial subscription amount for Units in the Sub-Fund is €10,000 or its foreign currency equivalent (or less at the discretion of the Manager).

Minimum Holdings

Any Unitholder who redeems or otherwise disposes of part of his holding must maintain a holding in the Sub-Fund of not less than €5,000 or its foreign currency equivalent (or less at the discretion of the Manager). The Manager may compulsorily redeem the remaining holding of any investor who redeems his holding of Units in the Sub-Fund to below €5,000.

REDEMPTIONS

Procedure

Redemption

Every Unitholder will have the right to require the Manager to redeem his Units in the Sub-Fund on any Dealing Day (save during any period when the calculation of the Net Asset Value is suspended or

the redemption of Units is limited in the circumstances set forth in the Prospectus) on furnishing to the Administrator a redemption request. Units may be redeemed only by written application through the Administrator.

All redemption requests are dealt with on a “forward” pricing basis, i.e. by reference to the Net Asset Value per Unit calculated as at the Valuation Point for the relevant Dealing Day.

Redemption Request

All applicants must deliver in writing to the Administrator a redemption request. A redemption request may be made by facsimile by a Unitholder, but if the account details for redemption payments are different to those set out in the Application Form, the original will be required by the Administrator and verification of the details may be required.

Redemption requests must be received by 1.00 p.m (Irish time) on the Business Day immediately preceding the relevant Dealing Day.

If the redemption request is received after the relevant time for receipt thereof it shall be treated as a request for redemption on the Dealing Day following such receipt but redemption requests may be accepted for redemption, if received prior to the Valuation Point on the relevant Dealing Day (at the discretion of the Manager). Units will be redeemed at the Net Asset Value for the relevant Dealing Day.

A redemption request shall (save as determined by the Manager) be irrevocable and may be sent by facsimile at the risk of the relevant Unitholder. No redemption proceeds will be paid out unless cleared funds and an original initial Application Form has been received by the Administrator, together with any other documents required by the Administrator (including documents to comply with anti-money laundering procedures).

PAYMENT OF REDEMPTION PROCEEDS

Method and Currency of Payment

Redemption payments will be made in Euro (unless otherwise agreed with the Manager) to the bank account detailed on the original Application Form or otherwise as amended in writing. Payments will only be made to accounts in the name of the investor. No interest will be paid in respect of redemption payments made in circumstances where the redemption request is held over to the next Dealing Day. The Fund may make redemption payments in currencies other than the base currency in which the units are denominated and in such event, the Manager will arrange for conversion of the redemption monies into such other currency. This may delay the processing of any such application. The cost and risk of converting currency will be borne by the applicant.

Timing

Redemption proceeds in respect of Units will normally be paid two Business Days after the relevant Dealing Day provided that all the required documentation has been furnished to and received by the Administrator.

Fractions

Apart from circumstances in which a Unitholder is redeeming his entire holding of Units:-

- (a) fractions of Units will be issued where any part of the redemption monies for Units represents less than the Net Asset Value per Unit, provided however that fractions shall not be less than .01 of a Unit; and

- (b) redemption monies, representing less than .01 of a Unit will not be returned to a Unitholder but will be retained by the Manager in order to defray administration costs.

Switching

Unitholders of other sub-funds of the Fund may switch into the Sub-Fund. Furthermore, Unitholders in the Sub-Fund may switch into other sub-funds. Details concerning the procedures for switching are set forth in detail under the Section headed "Conversion between Sub-Funds" in the Prospectus.

FEES AND EXPENSES

The Manager is entitled to charge a fee of 0.195% of the Net Asset Value of the Sub-Fund in respect of Units of the Sub-Fund. The relevant fee will be accrued weekly based on the Net Asset Value of the Units and will be paid monthly in arrears.

Trustee Fees

The Trustee shall be entitled to charge all agreed fees up to 0.10% of the Net Asset Value of the Sub-Fund which shall be accrued weekly and payable monthly in arrears out of the assets of the Sub-Fund. The Trustee shall also be entitled to receive out of the assets of the Sub-Fund transaction charges and sub-custody fees at normal commercial rates, together with all reasonable and properly vouched out-of-pocket expenses (plus any applicable taxes), it incurs on behalf of the Sub-Fund in the performance of its duties under the Trust Deed, which shall be payable monthly in arrears.

Administration Fees

The Administrator shall be entitled to charge all agreed fees up to 0.10% of the Net Asset Value of the Sub-Fund which shall be accrued weekly and payable monthly in arrears out of the assets of the Sub-Fund. The Administrator is also entitled to receive out of the assets of the Sub-Fund all reasonable and properly vouched out-of-pocket expenses (plus any applicable taxes), it incurs on behalf of the Sub-Fund in the performance of its duties under the Administration Agreement, which shall be payable monthly in arrears.

Further details in relation to applicable fees and expenses are set out in the Prospectus.

RISK FACTORS

Potential investors should consider the risk factors set forth in the Prospectus.