

State Street Global Equity Diversified Index Fund

Website disclosure for an Article 8 fund



A. Summary

The State Street Global Equity Diversified Index Fund (“**Fund**”) is an index fund tracking the performance of the WTW Global Equity Diversified Index on MSCI ACWI (“**Index**”). The Index has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.

The Index is designed to exhibit lower greenhouse emission exposure than the MSCI ACWI (the “**Parent Index**”). The Index uses an optimisation process that aims to: reduce the weighted average greenhouse gas emissions intensity by 50% compared to the Parent Index by time of the November 2030 Index Review when compared to the Parent Index levels as computed in November 2019 Index Review, reduce the weighted average greenhouse gas emissions intensity by 10% compared to the Parent Index at the time of Index Review, and on an annualized basis, reducing the weighted average WTW Climate Transition Value-at-Risk (or ‘CTVaR’) (which is calculated by Willis Limited (“Willis”) and is a measure of the risk of a reduction in an asset’s value due to the global transition to net-zero emissions of the Index to 75% of CTVaR of the Parent Index.

The Index uses MSCI ESG Business Involvement Screening Research and MSCI Climate Change Metrics to identify companies that are involved in the following business activities. Companies that meet the business involvement criteria (Compliance with the United Nations Global Compact Principles, Controversial Weapons, Thermal Coal Mining, Thermal Coal Power, Tobacco, and Oil Sands) are excluded from the Index.

The Index uses MSCI ESG Ratings to identify companies that have demonstrated an ability to manage their ESG risks and opportunities. Companies not assessed by MSCI ESG Research on MSCI ESG Ratings are excluded from the Index. The Index aims to achieve a similar industry-adjusted ESG Score of the Index as that of the Parent Index.

The investment policy of the Fund is to track the performance of the Index as closely as possible using the Replication Strategy as further described in the “Investment Strategies” section of the Prospectus, while seeking to minimise as far as possible the tracking difference between the Fund’s performance and that of the Index. The assessment of good governance practices is implemented through the negative screening utilised by the Index.

At least 90% of the Fund’s assets are invested in securities which are aligned with environmental and social characteristics promoted by the Fund. The remaining portion (<10%) of the portfolio, consisting of cash as well as cash equivalents and financial derivative instruments used for efficient portfolio management purposes, held at the Investment Manager’s discretion, will not be aligned with the promoted environmental and social characteristics.

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

The link to the Index methodology which captures the environmental or social characteristics promoted by the Fund is made available in the Relevant Supplement and is included below.

The data sources used to attain the relevant environmental or social characteristics are detailed in the Index methodology.

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 data may be based on certain assumptions, forecasts, projections, views and opinions which may be based on current market trends or anticipated future events. 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 ESG data is always accurate or correct or that the ESG 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.

SSGA oversees external vendors, including index providers, in-line with its third party risk management programme. SSGA 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.

SSGA's engagement policies are not directly embedded into the Fund's investment strategy. However, SSGA's Asset Stewardship programme consolidates all voting and engagement activities across asset classes, irrespective of investment strategy or geographic region, including for the Fund.

The Index is rebalanced on a semi-annual basis, as of the close of the last business day of May and November

Please refer to MSCI's index methodology description which can be found at the following link: [WTW Global Equity Diversified Index on MSCI ACWI](#).

For further information and details please refer to the relevant sections below, the Prospectus and Relevant Supplement.



B. No sustainable investment objective

The Fund promotes environmental or social characteristics and while it does not have as its objective a sustainable investment.



C. Environmental or social characteristics of the financial product

The environmental and/or social characteristics promoted by the Fund are those promoted by the Index which the Fund tracks. The Index is designed to exhibit lower greenhouse emission exposure than the MSCI ACWI (the "**Parent Index**"). The Index uses an optimisation process that aims to: reduce the weighted average greenhouse gas emissions intensity by 50% compared to the Parent Index by time of the November 2030 Index Review when compared to the Parent Index levels as computed in

November 2019 Index Review, reduce the weighted average greenhouse gas emissions intensity by 10% compared to the Parent Index at the time of Index Review, and on an annualized basis, reducing the weighted average WTW Climate Transition Value-at-Risk (or 'CTVaR') (which is calculated by Willis Limited ("Willis") and is a measure of the risk of a reduction in an asset's value due to the global transition to net-zero emissions of the Index to 75% of CTVaR of the Parent Index.

The Index uses MSCI ESG Business Involvement Screening Research and MSCI Climate Change Metrics to identify companies that are involved in the following business activities. Companies that meet the business involvement criteria (Compliance with the United Nations Global Compact Principles, Controversial Weapons, Thermal Coal Mining, Thermal Coal Power, Tobacco, and Oil Sands) are excluded from the Index.

The Index uses MSCI ESG Ratings to identify companies that have demonstrated an ability to manage their ESG risks and opportunities. Companies not assessed by MSCI ESG Research on MSCI ESG Ratings are excluded from the Index. The Index aims to achieve a similar industry-adjusted ESG Score of the Index as that of the Parent 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 is designed to exhibit lower greenhouse emission exposure than the Parent Index. The Index uses an optimisation process that aims to: reduce the weighted average greenhouse gas emissions intensity by 50% compared to the Parent Index by time of the November 2030 Index Review when compared to the Parent Index levels as computed in November 2019 Index Review, reduce the weighted average greenhouse gas emissions intensity by 10% compared to the Parent Index at the time of Index Review, and on an annualized basis, reducing the weighted average WTW Climate Transition Value-at-Risk (or 'CTVaR') (which is calculated by Willis Limited ("Willis") and is a measure of the risk of a reduction in an asset's value due to the global transition to net-zero emissions of the Index to 75% of CTVaR of the Parent Index.

The Index uses MSCI ESG Business Involvement Screening Research and MSCI Climate Change Metrics to identify companies that are involved in the following business activities. Companies that meet the business involvement criteria (Compliance with the United Nations Global Compact Principles, Controversial Weapons, Thermal Coal Mining, Thermal Coal Power, Tobacco, and Oil Sands) are excluded from the Index.

The Index uses MSCI ESG Ratings to identify companies that have demonstrated an ability to manage their ESG risks and opportunities. Companies not assessed by MSCI ESG Research on MSCI ESG Ratings are excluded from the Index. The Index aims to achieve a similar industry-adjusted ESG Score of the Index as that of the Parent Index.

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 Strategies" 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 assessment of good governance practices is implemented through the negative screening utilised by the Index. 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. 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.

To the extent that the Fund may use 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 SFDR or the Taxonomy Regulation.



F. Monitoring of environmental or social characteristics

The following sustainability indicators (as calculated by the Index provider) are used to measure the attainment of the environmental and social characteristics promoted by the Fund:

- Weighted Average Industry-Adjusted ESG Score of the Index is equal to or greater than 100% of Weighted Average Industry-Adjusted ESG Score of the Parent Index
- Weighted Average WTW CTVaR (Climate Transition Value at Risk) of Index is equal to or greater than 75% of Weighted Average WTW CTVaR of the Parent Index
- Achieve 50% of MSCI ACWI Nov 2019 Index Review Weighted Average GHG Emissions Intensity by Nov 2030 Index Review
- Exclusion Criteria: Exclude companies based on their business involvement in: Compliance with the United Nations Global Compact Principles, Controversial Weapons, Thermal Coal Mining, Thermal Coal Power, Tobacco, and Oil Sands.
- Achieve a similar industry-adjusted ESG Score of the Index as that of the Parent Index.

The Index is reviewed on a quarterly basis to coincide with the regular Index Reviews of the MSCI Global Investable Market Indexes. The changes are implemented as of the close of the last business day of February, May, August and November. The Fund rebalances in line with this reviews.



G. Methodologies

The link to the Index methodology which captures the environmental or social characteristics promoted by the Fund is made available in the Relevant Supplement and in Section L below.



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. 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 a company'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 identification of relevant factors for the ESG analysis; and
- the quantity and quality of ESG data to be processed.

ESG 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 ESG data is always accurate or correct or that the ESG 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.



J. Due diligence

SSGA oversees external vendors, including index providers, in line with its third party risk management programme. SSGA 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 SSGA engagement policies are not directly embedded into the Fund's investment strategy, for SSGA the informed exercise of voting rights coupled with targeted and value-driven engagement is the most effective mechanism of creating value and managing Sustainability Risk for the investors. SSGA's Asset Stewardship programme consolidates all voting and engagement activities across asset classes, irrespective of investment strategy or geographic region. The engagement strategy is built on SSGA's ability to prioritise and allocate resources to companies and issues that have the greatest potential impact. SSGA's Asset Stewardship programme is underpinned by 3 separate pillars, that is, (i) providing information and guidance to investee companies on the development of ESG practices across key issues, (ii) engaging with portfolio companies to encourage transparent, accountable, high performing boards and companies, and (iii) by exercising voting rights in a manner that reflects long term investment objectives for the purpose of influencing the activity or behaviour of the issuers. To support this process, SSGA has developed proprietary in-house tools to help identify companies for active engagement based on various financial and ESG indicators.



L. Reference benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the Fund?

☒ Yes

☐ No

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The Index is reviewed on a quarterly basis to coincide with the regular Index Reviews of the MSCI Global Investable Market Indexes. The changes are implemented as of the close of the last business day of February, May, August and November.

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The WTW Global Equity Diversified Index on MSCI ACWI is a trademark of MSCI Inc.