

State Street Global Advisors Europe Limited (“SSGAEL”) Remuneration Disclosure under Article 5 of the Sustainable Finance Disclosure Regulation¹

SSGAEL is a subsidiary of State Street and has adopted a remuneration policy that is aligned with the State Street group-wide remuneration strategy and the wider group’s business strategy and risk appetite.

State Street operates a fully flexible, discretionary incentive policy (i.e. the amount of individual variable remuneration may fluctuate significantly from one year to the next, depending on performance and other factors, and even could be reduced to zero for any given year).

As part of a global organization, the overall bonus pool is determined based on firm-wide performance against objectives set at the beginning of the year. Variable remuneration for SSGAEL employees is assigned on an individual basis and is based on group, business unit and individual performance including performance against sustainability risk-related objectives.

Sustainability risks are integrated in SSGAEL remuneration practices through the implementation of mandatory sustainability-related performance objectives.

Objectives are structured to reflect individual roles with core goals, such as training, applicable to all employees. Sustainability risk awareness training is mandatory and carries remuneration implications for non-completion. In addition, role-specific objectives are assigned based on individual responsibilities and expertise. Sustainability risk performance objectives are mandatory for relevant employees of SSGAEL. Achievement against this performance objective is assessed as part of the standard performance management process and poor performance may result in reduction in incentive compensation.

For the executives, performance assessments include an evaluation of leadership performance, which is intended to promote a focus on factors such as sustainability, risk excellence, talent development, employee engagement and other leadership behaviours.

Variable remuneration is subject to deferral, with an increasing portion deferred based on the size of the award and the seniority of the recipient. Variable remuneration, including the deferred portion, is subject to risk-adjustment, including through forfeiture and clawback.

SSGAEL relies on a regional governance structure intended to provide effective control of remuneration arrangements (including compliance with applicable remuneration regulations) and alignment of the incentive arrangements with State Street’s risk appetite, including financial safety and soundness consistent with applicable related regulatory rules and guidance and in a manner appropriate to the size, internal organisation and the nature, scope and complexity of our businesses.

¹ Regulation (EU) 2019/2088

SSGAEL's remuneration policy promotes sound and effective risk management, taking into account the risk profile of SSGAEL, the long-term interests and strategy of the business and the risks presented to it (including, for example, sustainability risks).

As a result of these reviews and processes, we believe that our compensation policies and practices for employees do not promote excessive risk taking (including with regard to sustainability risks) and do not provide incentives to create risks that are reasonably likely to have a material adverse effect on us..

This sustainability in remuneration disclosure statement is reviewed on an annual basis or more frequently, as required.