Supplement No. 38

(A Fund of SSgA Qualified Trust (the "**Trust**") which qualifies as a qualifying investor alternative investment scheme for the purposes of the Central Bank's regulations on collective investment schemes established under the Unit Trusts Act, 1990 and for the purposes of the AIFMD Regulations).

This Supplement (the "Supplement") forms part of the Prospectus dated 29 November 2022 as amended from time to time (the "Prospectus") in relation to the Trust. This Supplement should be read together with the Prospectus. It contains information relating to the Fund and its available Classes.

The Fund is intended to be used by TLF Eligible Investors only. Unless otherwise expressly agreed in writing under a separate agreement, the Manager, or any affiliate of the Manager:

- (I) will not act as investment manager, fund manager or adviser to the TLF Eligible Investor or to any of the TLF Eligible Investor's trustees, investment consultant, fund manager and/or advisers
- (II) will not undertake to give advice in a fiduciary capacity in connection with the offer of sale of Units in the Trust or any Fund and
- (III) will not assess
  - (A) the suitability for any TLF Eligible Investor of an investment into the Fund or
  - (B) That any such investment is consistent with any applicable diversification requirements specific to that TLF Eligible Investor or
  - (C) That the investment is consistent with the TLF Eligible Investor's statement of investment principles.

Each TLF Eligible Investor should consult an investment consultant or other financial adviser for independent advice in relation to the matters set out in (ii) (a)-(c) above as well as any other matters pertinent for that TLF Eligible Investor before investing into the Fund.

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 and the Prospectus carefully. If you have any questions, you should consult your investment consultant and/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 Directors of the Manager whose names appear under the heading "Management and Administration" of the Prospectus, accept responsibility for the information contained in this Supplement.

# **Fund Characteristics**

Base Currency	GBP	
Investment Manager	State Street Global Advisors Europe Limited.	
Sub-Investment Manager(s)	State Street Global Advisors Limited.	
TER	0.05% of NAV per annum max	
SFDR Fund Classification	Integrates Sustainability Risk / Article 8	
Dealing Information		
Dealing Day	every Business Day other than days during which normal dealing has been temporarily suspended.	
Dealing Deadline	for all subscriptions and redemptions: 10.00 am (Irish time) on the Business Day before the Dealing Day.	
Valuation Information		
Valuation Point	5.00 pm (Irish time) on each Business Day.	
Valuation Pricing Used	Closing mid prices.	

# **Investment Objective and Policy**

#### **Investment Objective:**

The objective of the Fund is to maintain a high level of liquidity, preserve capital and provide a return in line with Sterling money market rates. There can be no assurance that the Fund will achieve its objective.

Investment Policy: The investment policy of the Fund is to achieve the investment objective by investing in the State Street GBP Liquidity LVNAV Fund, a sub-Fund of State Street Liquidity plc. The investment manager and/or Sub-Investment Manager of the State Street GBP Liquidity LVNAV Fund, when selecting investments, will adopt a best in class approach to ESG considerations by seeking to invest the majority of the Fund's portfolio in securities that are classified as sustainable investments under article 2(17) of SFDR using the Investment Manager's proprietary assessment methodology and, for government and supranational issuers, classified within the two highest categories of a third party ESG rating.

Additionally, when selecting investments, the Investment Manager and/or Sub-Investment Manager, on behalf of the State Street GBP Liquidity LVNAV Fund, will screen out securities of issuers identified as being non-compliant with UN Global Compact Principles relating to environmental protection, human rights, labour standards and anticorruption, as well as controversial weapons and the issuers involved in thermal coal, arctic drilling, oil and tar sands, tobacco, civilian firearms, as well as severe ESG controversies. The Investment Manager and/or Sub-Investment Manager on behalf of the State Street GBP Liquidity LVNAV Fund may use additional ESG screens from time to time in order to exclude securities of issuers based on their involvement with an activity that is deemed noncompliant with one or more of such ESG criteria referred to in the previous sentence. The specific list of applicable exclusions for the State Street GBP Liquidity LVNAV Fund may evolve and may be amended from time to time at the Investment Manager's and/or Sub-Investment Manager's absolute discretion. For further details of the exclusions applied by the Investment Manager and/or Sub-Investment Manager at any time on behalf of the State Street GBP Liquidity LVNAV Fund, please refer to Fund Finder (ssga.com).

This Fund promotes environmental or social characteristics in accordance with Article 8 of SFDR through its investment in State Street GBP Liquidity LVNAV Fund, which is also classified as an Article 8 fund. The environmental and social characteristics promoted by State Street GBP Liquidity LVNAV Fund (and by the Fund, through its investment in State Street GBP Liquidity LVNAV Fund) include investment in issuers deemed to perform better in relation to financially material ESG challenges, avoidance of issuers deemed noncompliant with the Investment Manager's ESG criteria such as violations of UN Global Compact Principles or involvement in controversial weapons and exclusion of

issuers involved in thermal coal, arctic drilling, oil and tar sands, tobacco, civilian firearms as well as severe ESG controversies. More information about the environmental and social characteristics promoted by this Fund can be found in the SFDR Annex in Appendix 1 hereto. For further information on the environmental and social characteristics promoted by the State Street GBP Liquidity LVNAV Fund, please refer to the SFDR Annex of the State Street GBP Liquidity LVNAV Fund that can be found on Fund Finder (ssga.com).

Although the Investment Manager and/or Sub-Investment Manager may consider the above in purchasing or selling, or entering into, investments (including but not limited to other fixed income and money market instruments and permitted collective investment schemes) for the Fund, the Investment Manager and/or Sub-Investment Manager may purchase, sell, enter into or continue to hold an investment for the Fund whenever it believes that doing so may benefit the Fund, on the basis of any of the factors described above or any other factors it may in its discretion consider.

As at the date of this Supplement, by virtue of the Fund's allocating investment to the State Street GBP Liquidity LVNAV Fund, 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.

#### **Permitted Investments**

Other Funds / Liquid Assets: The Fund may invest up to 100% of its net assets in other regulated open-ended funds where the objectives of such funds are consistent with the objective of the Fund or are Money Market Funds and where such funds are authorised in member states of the EEA, USA, Jersey, Guernsey or the Isle of Man and where such funds comply in all material respects with the provisions of the UCITS Regulations (provided, however, the Fund shall not invest more than 50% of its net assets in any one such fund, other than a sub-fund of State Street Liquidity plc, details of which is set out in Appendix 2 of the Prospectus). The Fund may hold ancillary liquid assets such as deposits.

## SFTR Techniques

The Fund does not intend to engage in repurchase or reverse repurchase agreements or TRS.

#### Leverage Policy

The Fund's maximum gross leverage ratio as calculated using the gross methodology and the Fund's maximum net leverage ratio as calculated using the commitment approach is as set out below.

Maximum gross leverage ratio	1:1
Maximum net leverage ratio	1:1

#### **Investment Risks**

Investment in the Fund carries with it a degree of risk. Investors should read the "Risk Information" section of the Prospectus and in particular, "Capital Calls and Leverage Policy" as well as the "Mandatory Redemptions" and "TLF Exchange of Units" section. In addition, the following risks are particularly relevant for the Fund:

Capital Call Risk: There may be no limit on the number of Capital Calls a Unitholder may be asked to make. The individual situations of Unitholders will not and cannot be taken into account in determine whether or not to issue a Capital Call.

Concentration Risk: When the Fund focuses its investments in a particular market, the financial, economic, business, and other developments affecting issuers in that market 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 Units in response to factors affecting or expected to affect a market in which the Fund focuses its investments.

**ESG Risk:** If the Fund directly or indirectly through other collective investment schemes invests in companies taking into account environmental, social and corporate governance (ESG) criteria, then the performance of the Fund may trail the returns of a portfolio of such securities. Investment by the Fund, either directly or indirectly in only a portfolio of securities that comply with such ESG criteria may affect the Fund's exposure to certain types of investments and may adversely impact the Fund's performance.

**Exchange of Units Risk:** If the calculation of the NAV of the Fund or of any fund into which it invests is suspended (and the issue and redemption of Units is suspended), the Exchange of Units Process will not be operated and Capital Calls or Capital Distributions may be automatically triggered.

Integrating Sustainability Risk: Integrating Sustainability Risk into the Fund's investment process 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.

**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.

Risks of Investment in Other UCIs: When a Fund invests in another UCI, it risks that such UCI will not perform as expected as well as all of the risks applicable to an investment in such UCI. Differences between the characteristics of the other UCI and those of the Fund may exacerbate these risks. The Fund may not be able to subscribe or redeem interest in the UCI at a desirable time or price. The Investment Manager and/or Sub-Investment Manager or an affiliate may service such UCI, leading to potential conflicts of interest.

Screening Risk: There is a risk that the screen provider may make errors, such as incorrect assessment of the screen criteria described in the Investment Policy and/or include incorrect/exclude correct securities in the screening process. Any assessment of ESG criteria by a screen provider 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 characteristics. 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 issuers (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.

SFDR - Fund Classification Risk: The SFDR has phased implementation from 10 March 2021 and imposes certain disclosure obligations on financial market participants. As at the date of this Supplement, the implementing Regulatory Technical Standards (Level 2) for SFDR have been adopted by the European Commission. 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 pension fund and insurance investors with a short, medium, or long term horizon who want to gain to

Sterling money market rates and are prepared to accept the risks associated with an investment of this type.

## **Unit Classes**

As of the date of this Supplement, the Fund offers the following Unit Classes of the Fund:

Class B Units - reserved for institutional investors who
have entered into an investment management
agreement or other arrangements with the Investment
Manager and/or Sub-Investment Manager or any of its
affiliates, in each case in a format satisfactory to the
Directors (a "Qualifying Agreement"), or as the
Directors may otherwise, in their sole discretion,
determine.

# **Subscriptions & Redemptions**

Investors may subscribe for or redeem Units in the Fund on each Dealing Day at the Dealing Price with an appropriate provision for applicable Anti-Dilution Levy, and in accordance with the provisions in the "Subscription" and "Redemption" sections of the Prospectus.

For subscriptions, consideration, in the form of cash, must be received by the Settlement Deadline.

# **APPENDIX 1**

# **SFDR ANNEX**

# 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

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 anv environmental or social objective that and the 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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name**: State Street Target **Legal entity identifier**: 5493007T5NJ7QC3UB970 Leverage Cash Fund (the "Fund")

#### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?								
• •		Yes	• •	×	No			
	inves	make a minimum of sustainable stments with an environmental ctive:%		chara object minin	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% of sustainable tments			
		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			
		make a minimum of sustainable stments with a social objective:			motes E/S characteristics, but will not make any ainable investments			

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



The Fund seeks to achieve its investment object by investing into State Street GBP Liquidity LVNAV Fund (the "**Master Fund**"), which is also managed by the Investment Manager and / or Sub-Investment Manager. As such, through this feeder investment, the Fund also seeks to promote those environmental and social characteristics promoted by the Master Fund, as detailed below.

The Master Fund seeks to promote the following environmental and social characteristics:

- Investment of the majority of the Master Fund's net assets in sustainable investments;
- The Investment Manager and / or Sub-Investment Manager seeks to identify the issuers deemed to perform better as it relates to financially material ESG challenges facing the issuer's industry;
- Avoidance of investment in issuers which show an involvement in activities which are deemed noncompliant with the Investment Manager's ESG criteria such as violations of UN Global Compact Principles or involvement in controversial weapons; and
- Exclusion of issuers involved in thermal coal, arctic drilling, oil and tar sands, tobaccos, civilian firearms, as well as severe ESG controversies.

For the purposes of attaining the environmental and social characteristics promoted by the Fund and the Master Fund, the Investment Manager considers the ESG characteristics of individual securities using a proprietary ESG score to adopt a best in class approach by seeking to invest the majority of the Master Fund's portfolio in securities that are classified as sustainable investments and, for government and supranational issuers, are within the two highest categories using a third party ESG rating. In addition to this, a

negative and norms-based screen is applied to screen out securities based on an assessment of their adherence to certain ESG criteria listed above. The Master Fund may use additional ESG screens from time to time in order to exclude securities based on their involvement with an activity that is deemed non-compliant with one or more of such ESG criteria.

The specific list of applicable exclusions used by the Master Fund may evolve and may be amended from time to time at the Investment Manager's absolute discretion.

No reference benchmark has been designated to attain the environmental and social characteristics promoted by the Fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

The attainment of the environmental and social characteristics is achieved through the Fund's feeder investment in the Master Fund, and the sustainability indicator used by the Fund is therefore the % of its net assets that are invested in the Master Fund.

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?

N/A. The Fund does not commit to making any sustainable investments.

Further information on the sustainable investments made by the Master Fund, is contained in the Master Fund's supplement and SFDR Annex.

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?

N/A. The Fund does not commit to making any sustainable investments.

Further information on the sustainable investments made by the Master Fund, is contained in the Master Fund's supplement and SFDR Annex.

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

N/A. The Fund does not commit to making any sustainable investments.

Further information on the sustainable investments made by the Master Fund, is contained in the Master Fund's supplement and SFDR Annex.

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

N/A. The Fund does not commit to making any sustainable investments.

Further information on the sustainable investments made by the Master Fund, is contained in the Master Fund's supplement and SFDR Annex.

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

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.

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

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

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?

#### ✓ Yes

By virtue of the Fund's allocating investment to the Master Fund, the Investment Manager and/or Sub-Investment Manager consider the principal adverse impacts of the Fund's investment decisions at the Fund level in order to seek to reduce negative externalities that may be caused by its underlying investments.

The Master Fund pursues a reduction of negative externalities caused by its underlying investments and in that context considers the PAIs on sustainability factors as part of the consideration of sustainable investments in selecting the securities for the Master Fund and by applying the negative and norms-based ESG screens prior to the construction of the portfolio. Specifically, the Master Fund considers:

- Greenhouse Gas emissions
- Carbon footprint
- Greenhouse gas intensity of investee companies
- Exposure to companies active in the fossil fuel sector
- Share of non-renewable energy consumption and production
- Energy consumption intensity per high impact climate sector
- Activities negatively affecting biodiversity-sensitive areas
- Emissions to water
- Hazardous waste and radioactive waste ratio
- Violations of UN Global Compact Principles
- Unadjusted gender pay gap
- Board gender diversity
- Exposure to controversial weapons

Further information on the PAIs will be found in the periodic reports for the Master Fund.

□ No



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

The Fund seeks to achieve its investment object by investing in the Master Fund which is classified as a "LVNAV MMF" as defined by Regulation (EU) 2017/1131. The Master Fund is also classified under Article 8 of SFDR.

The Investment Manager, on behalf of the Master Fund, combines a relative value approach to investing with credit quality analysis to identify securities that it believes will provide the greatest stability of capital and the highest probability of repayment.

In implementing this strategy, the Investment Manager adopts a best in class approach to ESG considerations by seeking to invest the majority of the Master Fund's portfolio in securities that are classified as sustainable investments and, for government and supra-national issuers, classified within the two highest categories of a third party ESG rating.

In addition, the Investment Manager applies the negative and norms-based ESG screen prior to the construction of the portfolio of the Master Fund and on an ongoing basis.

Application of the ESG screens results in the exclusion of any securities from the Master Fund's portfolio based on an assessment of their adherence to certain ESG criteria defined by the Investment Manager. The Master Fund will screen out securities identified as being non-compliant with UN Global Compact Principles (relating to environmental protection, human rights, labour standards and anti-corruption), as well as securities of companies associated with Severe ESG Controversies, thermal coal, arctic drilling, oil and tar sands, civilian firearms, controversial weapons and tobacco. The Master Fund may use additional ESG screens from time to

The investment strategy guides investment decisions based on factors such as

investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Asset allocation describes the share of investments in specific assets.

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.

time in order to exclude securities based on their involvement with an activity that is deemed non-compliant with one or more of such ESG criteria.

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?

In order to attain the environmental and social characteristics promoted by the Fund, the Fund invests its assets in the Master Fund.

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

N/A

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

The Fund invests its assets in the Master Fund.

At Master Fund level, the assessment of good governance practices is implemented through the negative screening utilised by the Master Fund. Companies deemed by the Investment Manager to not violate UNGC principles are considered to exhibit good governance.

What is the asset allocation planned for this financial product?



**#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.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

N/A

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

M

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

N/A. The Fund does not commit to investing in any "environmentally sustainable investment" within the meaning of the Taxonomy Regulation.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

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 available and yet among others have greenhouse gas levels emission corresponding to the best performance.

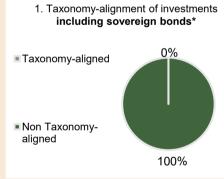
Does the financial product invest in fossil gas and/or nuclear energy related activities the Taxonomy 1

Yes:

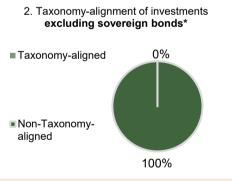
In nuclear energy

No

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.



In fossil gas



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

<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.

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

N/A



sustainable

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activities

FU

objective that do not take into

sustainable

economic

Taxonomy.

under

for

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

N/A. The Fund does not commit to making any sustainable investments.

Further information on the sustainable investments made by the Master Fund, is contained in the Master Fund's supplement and SFDR Annex.



What is the minimum share of socially sustainable investments?

N/A. The Fund does not commit to making any sustainable investments.

Further information on the sustainable investments made by the Master Fund, is contained in the Master Fund's supplement and SFDR Annex.



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 balances at the Investment Manager's discretion, which are classified under #2 Other in the above table. Given the nature of cash, 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?

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

No

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

N/A

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

N/A

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

N/A

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

N/A

Where can I find more product specific information online?



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

# Fund Finder (ssga.com)

Please search for State Street Target Leverage Cash Fund under the "Fund Groups" heading.