

State Street CCF World Climate Transition CTB Index Equity Fund

Website disclosure for an Article 8 fund



A. Summary

The State Street CCF World Climate Transition CTB Index Equity Fund (“**Fund**”) is an index fund tracking the performance of the MSCI World EU CTB Overlay Select Index (“**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 meet the minimum standards of the EU Climate Transition Benchmark (“**CTB**”) under the Benchmark Regulation. The Index aims to represent the performance of a sub-set of equity securities of companies within the MSCI World Index (“**Parent Index**” or “**Investment Universe**”). Such securities within the Investment Universe are re-weighted based upon the opportunities and risks associated with the transition to a lower carbon economy using an optimization-based approach. The aim of the optimization process is to reduce the weighted average greenhouse gas (“**GHG**”) intensity by minimum 30% relative to the Parent Index, while further reducing GHG intensity by 7% on an annualized basis. The Fund will also target a modest tracking error and low turnover compared to the Parent Index. The Index also applies an MSCI ESG Score Improvement of 10% relative to the Parent Index, as calculated by the Index provider.

The environmental and/or social characteristics promoted by the Fund are those promoted by the Index which the Fund tracks. The Index aims to provide lower carbon emission exposure relative to the Parent Index and at least 30% of the Index will qualify as sustainable investments under article 2(17) of SFDR using the Investment Manager’s proprietary assessment methodology. The Fund aims to promote its environmental or social characteristics by investing in all or part of the equity securities comprised in the Index which is a CTB. In order for the security to qualify as a sustainable investment for the Fund, it must be classified as a “Leader” or “Outperformer” as determined by the Investment Manager using the ESG score generated by its proprietary ESG scoring process (the “**ESG Score**”).

The Fund also promotes the following environmental and social characteristics: a) the reduction of environmental footprint and b) the reduction of adverse social impacts. The Fund promotes these characteristics on the basis of Index exclusions of companies involved in controversial weapons businesses, very severe ESG controversies (red flag), very severe and severe environmental controversies (red and orange flag), tobacco manufacturing and companies assessed as having misalignment with the United Nations Global Compact Principles.

Additionally, on the basis of Index exclusions, the Fund promotes environmental and social characteristics related to reduction of environmental footprint and the availability of weapons by excluding investments in securities of companies which derive a certain percentage of their revenues from the manufacture of shale oil and gas, arctic oil & gas, oil sands, thermal coal mining, as well as companies that have any ties with nuclear weapons.

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: [MSCI EU CTB Overlay Select Indexes](#).

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, it will seek to invest a minimum of 30% of its portfolio in sustainable

investments under article 2(17) of SFDR using the Investment Manager's proprietary assessment methodology.

The Fund tracks the MSCI World EU CTB Overlay Select Index, which is a reference benchmark meeting the criteria for an EU Climate Transition Benchmark (CTB). The Index methodology therefore ensures that the Index securities do not significantly harm any environmental or sustainable investment objective. The Index methodology also applies a screen to align with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights as provided for under the Minimum Safeguards in the EU Taxonomy Regulation.

The Fund pursues a reduction of negative externalities caused by the underlying investments and in that context considers the principal adverse impacts ("PAI") on sustainability factors as part of the consideration of sustainable investments in selecting the securities for the Fund and by applying the negative and norms-based ESG screens prior to the construction of the portfolio.

The Index has taken mandatory PAI indicators into account in the assessment of business activities of the initial universe of securities. Revenue data, business involvement and other data sources have been considered when assessing each security using minimum thresholds or blanket exclusions on activities identified in relation to these indicators. The eligible universe is constructed once shale oil and gas, arctic oil & gas, oil sands, nuclear weapons and thermal coal mining are screened at a minimum threshold level and controversial weapons (PAI 14) are removed. Securities that have faced very severe and severe controversies pertaining to environmental issues are also removed (PAI 7,8,9). Embedded in the MSCI ESG controversy score ("MSCI ESG Controversy Score"), is an evaluation of UN Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact which removes securities having faced very severe controversies (PAI 10). The resulting eligible universe is then used to construct the Index using a sophisticated optimisation approach that reduces exposure to carbon intensity (PAI 1,2), reduces fossil fuel exposure (PAI 2,4) and increases exposure to securities with credible emission reduction targets (PAI 1,2,3,4,5). The optimisation also applies overweighing of companies providing sustainable/green solutions (PAI 7,8,9) and those providing green revenues. No optional indicators are taken into account. Note that these PAI indicators are built into the methodology of the Index and are applied by the Index Provider.



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 aims to provide lower carbon emission exposure relative to the Parent Index, in accordance with SFDR Article 8 and at least 30% of the Index will qualify as sustainable investments under article 2(17) of SFDR using the Investment Manager's proprietary assessment methodology. The Fund aims to promote its environmental or social characteristics by investing in all or part of the equity securities comprised in the Index which is a CTB.

The Fund also promotes the following environmental and social characteristics: a) the reduction of environmental footprint and b) the reduction of adverse social impacts. The Fund promotes these characteristics on the basis of Index exclusions of companies involved in controversial weapons businesses, very severe ESG controversies (red flag), very severe and severe environmental controversies (red and orange flag), tobacco manufacturing and companies assessed as having misalignment with the United Nations Global Compact Principles. The UNGC Principles is the world largest corporate sustainability initiative aimed at companies to align their strategies and operations

with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.

Additionally, on the basis of Index exclusions, the Fund promotes environmental and social characteristics related to reduction of environmental footprint and the availability of weapons by excluding investments in securities of companies which derive a certain percentage of their revenues from the manufacture of shale oil and gas, arctic oil & gas, oil sands, thermal coal mining, as well as companies that have any ties with nuclear weapons.

Business involvement in relation to each activity set out above is determined using the Index provider's proprietary methodology by way of considering the revenue a company generates from such business activity that exceeds a percentage of revenue or a defined total revenue threshold, or any exposure to the activity regardless of the amount of revenue generated.

The Fund allocates minimum 30% of the Fund's portfolio to sustainable investments. In order for the security to qualify as a sustainable investment for the Fund, it must be classified as a "Leader" or "Outperformer" as determined by the Investment Manager using the ESG score generated by its proprietary ESG Score.



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 constructed from its corresponding Parent Index using an optimisation process and its methodology aims to: reduce the weighted average GHG intensity by 30% compared to the underlying investment universe and reduce the weighted average GHG intensity by 7% on an annualized basis. The Index methodology also seeks to achieve a low turnover and to minimise tracking error relative to the Parent Index. The Parent Index measures the performance of large and mid-capitalisation stocks across a number of developed market countries.

The Index methodology also excludes companies involved in controversial weapons businesses, very severe ESG controversies (red flag), very severe and severe environmental controversies (red and orange flag), tobacco manufacturing and companies assessed as having misalignment with the United Nations Global Compact Principles. Additionally, the Index methodology excludes securities of companies which derive a certain percentage of their revenues from the manufacture of shale oil and gas, arctic oil & gas, oil sands, nuclear weapons and thermal coal mining. The Index provider may implement additional ESG screens from time to time in order to exclude securities of issuers based on their involvement with an activity that is deemed non-compliant with one or more of such ESG criteria referred to in this paragraph. The specific list of applicable exclusions may evolve and may be amended from time to time at the Index provider's absolute discretion. Such change may be implemented without notice to the Unitholders if deemed aligned with the screen criteria described in this section. To the extent that any such change results in a change to the way the investment policy is implemented or described in this Supplement, Unitholders will be notified in accordance with the requirements of the Central Bank. The Index also applies an MSCI ESG score improvement ("**MSCI ESG Score Improvement**") of 10% relative to the Parent Index, as calculated by the Index provider.

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.

The Fund will invest at least 30% of its assets in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. In order for the security to qualify as a sustainable investment for the Fund, it must be classified as a "Leader" or "Outperformer" as determined by the Investment Manager using the ESG score generated by its proprietary ESG Score.

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:

- Relative Reduction: Reduce the weighted average GHG intensity by minimum 30% compared to the underlying investment universe.
- GHG Intensity Reduction: Reduce the weighted average GHG intensity by minimum 7% on an annualized basis relative to the base date of the index.
- Exposure Constraint: Exposure to sectors with a high impact on climate change at least equivalent to the Parent Index.
- An increase in the weighted average MSCI ESG Score by 10% compared with the Parent Index.
- Exclusion Criteria: Exclude companies based on the following criteria:
 - The Index methodology also excludes companies involved in controversial weapons businesses, very severe ESG controversies (red flag), very severe and severe environmental controversies (red and orange flag), tobacco manufacturing and companies assessed as having misalignment with the United Nations Global Compact Principles. Additionally, the Index methodology excludes securities of

companies which derive a certain percentage of their revenues from the manufacture of shale oil and gas, arctic oil & gas, oil sands, thermal coal mining, as well as companies that have any ties with nuclear weapons,.

- The Index is in compliance with the minimum standards of the EU CTB under the Benchmark Regulation which requires the following securities to be excluded:
 - o companies involved in any activities related to controversial weapons;
 - o companies involved in tobacco manufacturing;
 - o companies that benchmark administrators find in violation of the United Nations Global Compact principles or the Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises; and
 - o any companies that are found or estimated by the index provider or by external data providers to significantly harm one or more of the environmental objectives referred to in Article 9 of the Taxonomy Regulation.

The Fund rebalances on a semi-annual basis, in line with the Index rebalancing frequency.



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

The Fund is an index fund tracking the performance of the MSCI World EU CTB Overlay Select Index. The Index has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund. The Index has been designed to meet the minimum standards of the EU CTB.

The Index aims to reflect the performance of a sub-set of equity securities of companies within the Parent Index which are selected and weighted in accordance with the Index methodology. The Index methodology aims to reduce exposure to transition and physical climate risks while pursuing opportunities arising from the transition to a lower-carbon economy and seeking to align the Fund's portfolio with the EU CTB as defined in the Benchmark Regulation. The Index methodology also excludes companies involved in controversial weapons businesses, very severe ESG controversies (red flag), very severe and severe environmental controversies (red and orange flag), tobacco manufacturing and companies assessed as having misalignment with the United Nations Global Compact Principles. Additionally, the Index methodology excludes securities of companies which derive a certain percentage of their revenues from the manufacture of shale oil and gas, arctic oil & gas, oil sands, nuclear weapons and thermal coal mining. The Index also applies an MSCI ESG Score Improvement of 10% relative to the Parent Index, as calculated by the Index provider.

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

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The MSCI World EU CTB Overlay Select Index is a trademark of MSCI Inc.