STATE STREET GLOBAL ADVISORS

State Street Global Climate Transition Equity Fund Website disclosure for an Article 8 fund

A. Résumé

La politique d’investissement du Compartiment State Street Global Climate Transition Equity Fund (le « **Compartiment** ») consiste à investir activement au moyen de la Stratégie en actions Transition climatique mondiale pour construire un portefeuille concentré de 30 à 40 titres. Pour ce faire, le Gestionnaire financier analyse le positionnement climatique et le plan de transition des sociétés bénéficiaires des investissements, tout en retenant celles qui adhèrent à certains critères ESG qu’il définit lui-même.

Le Compartiment promeut des caractéristiques environnementales ou sociales et, bien qu’il n’ait pas pour objectif l’investissement durable, il cherchera à investir un minimum de 25 % de son portefeuille dans des investissements durables selon l’article 2(17) du SFDR en utilisant la méthodologie d’évaluation interne du Gestionnaire financier.

Le Compartiment promeut des caractéristiques environnementales en investissant dans des sociétés qui, dans le cadre du processus exclusif de recherche ascendante (*bottom-up*) axée sur les fondamentaux du Gestionnaire financier, sont identifiées comme des sociétés offrant le meilleur compromis entre qualité, croissance durable et valorisations raisonnables, et bien positionnées pour faire face aux risques posés par le changement climatique et la transition vers une économie bas-carbone. En outre, d’autres caractéristiques environnementales et sociales sont promues au moyen d’un filtre négatif et basé sur des normes, appliqué au portefeuille du Compartiment pour éliminer les titres sur la base d’une évaluation de leur adhésion aux critères ESG, à savoir les normes internationales concernant la protection environnementale et sociale.

Le Gestionnaire financier investira activement, pour le compte du Compartiment, au moyen de la Stratégie en actions Transition climatique mondiale décrite plus en détail sous la section 8.1 du Prospectus et dans le Supplément correspondant. L’évaluation des pratiques de bonne gouvernance est mise en œuvre au moyen du processus de recherche fondamentale du Gestionnaire financier et du filtrage négatif appliqué par le Compartiment. Les entreprises que le Gestionnaire financier juge ne pas contrevenir aux principes du Pacte mondial des Nations Unies (le « **PMNU** ») sont considérées faire preuve de bonne gouvernance.

Le Gestionnaire financier emploie une méthodologie ESG contraignante qui vise à construire un portefeuille pour lequel au minimum 90 % des actifs du Compartiment sont investis dans des titres alignés sur les caractéristiques environnementales et sociales qu’il promeut. La partie restante (<10 %) du portefeuille, composée de trésorerie ainsi que d’équivalents de trésorerie existants détenus à la discrétion du Gestionnaire financier, ne sera pas alignée sur les caractéristiques environnementales et sociales promues. Si tant est que le Compartiment recoure à des instruments financiers dérivés, ceux-ci ne sauraient être utilisés pour atteindre les caractéristiques environnementales ou sociales qu’il promeut.

Le Compartiment ne s’engage pas à réaliser des investissements durables au sens du Règlement Taxinomie.

La réalisation des caractéristiques environnementales se mesure en vérifiant que l'exposition du portefeuille aux sociétés qui ont établi des objectifs de réduction des émissions alignés sur les engagements climatiques est supérieure à celle de l'Indice.

La réalisation plus approfondie des caractéristiques environnementales et sociales promues par le Compartiment est mesurée à l'aide du pourcentage du portefeuille investi en titres inclus dans le filtre négatif et basé sur des normes.

Le Compartiment utilise un processus de recherche ascendante (*bottom-up*) axée sur les fondamentaux, établi en interne par le Gestionnaire financier pour identifier les sociétés qui selon ce dernier offrent le meilleur compromis entre qualité, croissance durable et valorisations raisonnables, et qui sont bien positionnées pour faire face aux risques posés par le changement climatique et la transition vers une économie bas-carbone. En outre, un filtre négatif et normatif est appliqué au portefeuille du Compartiment selon les critères d'exclusion suivants :

- Armes controversées
- Violations du PMNU
- Charbon thermique
- Forage en Arctique
- Pétrole et sables bitumineux
- Graves controverses ESG
- Armes à feu civiles
- Tabac

Le Compartiment utilise les sources de données suivantes :
1. ISS pour les données SBTi
2. MSCI et Sustainalytics pour les filtres ESG

SSGA applique un processus de due diligence continu aux fournisseurs de données ESG, qui génère des rapports réguliers sur la qualité des données, et peut coopérer avec les fournisseurs de données concernées au sujet de tout problème lié aux données repéré par les équipes de SSGA.

Les données ESG peuvent être basées sur certaines hypothèses, prévisions, projections, perspectives et opinions, lesquelles s'appuient le cas échéant sur les tendances actuelles du marché ou sur les événements futurs anticipés. Étant donné la nature évolutive et innovante des modèles de données, des méthodologies et des hypothèses, ainsi que l'incertitude inhérente à la prédiction d'événements prospectifs, il ne peut être garanti que les données ESG sont toujours exactes ou correctes ni que les données ESG répondront aux objectifs ou aux exigences de quelque client ou investisseur donné que ce soit. De plus, il se peut que certaines données ne puissent être obtenues en raison du manque de disponibilité des sources de données.

Les politiques d'engagement de SSGA ne sont pas directement intégrées dans la stratégie d'investissement du Compartiment. Cependant, le programme d'intendance des actifs de SSGA consolide l'ensemble des activités actionnariales de vote et d'engagement, toutes classes d'actifs confondues, indépendamment de la stratégie d'investissement ou de la région géographique, y compris pour le Compartiment.

Pour plus d'informations détaillées, veuillez vous référer aux sections pertinentes ci-dessous, au Prospectus et au Supplément correspondant.

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 25% of its portfolio in sustainable investments under article 2(17) of SFDR using the Investment Manager's proprietary assessment methodology.

The Investment Manager applies a negative and norms-based screen to the Fund to screen out securities based on an assessment of their adherence to ESG criteria including securities of companies identified as being non-compliant with UNGC Principles (relating to environmental protection, human rights, labour standards and anti-corruption) and securities of companies associated with Severe ESG Controversies, controversial weapons, civilian firearms, tobacco, thermal coal, arctic oil & gas exploration and oil sands extraction. By applying the relevant negative and norms-based screen, the Investment Manager deems the Fund's sustainable investments not to cause significant harm to any environmental or social sustainable investment objective.

The Fund considers principal adverse impacts ("PAI") on sustainability factors by applying the negative and norms-based ESG screen prior to the construction of the portfolio. Specifically, the Fund considers:

- Exposure to companies active in the fossil fuel sector
- Violations of UN Global Compact Principles
- Exposure to controversial weapons

The Fund excludes companies that the Investment Manager has deemed to violate UNGC principles as part of the negative screening utilised by the Fund. The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are considered as part of the UNGC principles assessment.

C. Environmental or social characteristics of the financial product

The Fund promotes certain environmental characteristics through investments in companies which have been identified through the Investment Manager's proprietary fundamentally driven and bottom-up research process to offer the best combination of quality, durable growth and reasonable valuation, and that are well positioned for the risks posed by climate change and the transition to a low-carbon economy.

In addition to this, further environmental and social characteristics are promoted by negative and norms-based screens applied to the portfolio of the Fund to screen out securities based on an assessment of their adherence to ESG criteria, i.e. international norms in relation to environmental and social protection. Specifically, the Fund promotes certain environmental characteristics through exclusion of investments in companies which violate UNGC principles relating to environment (Principles 7 to 9) and which are active in thermal coal, arctic oil & gas exploration, and oil sands extraction.

The Fund also promotes certain social characteristics through exclusion of investments in companies which violate UNGC Principles relating to human rights (Principles 1 and 2), labour standards (Principles 3 to 6), anti-corruption (Principle 10) and companies associated with controversial weapons, civilian firearms and tobacco. 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.

The 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 Fund further promotes certain environmental and social characteristics through its allocation of a portion of the portfolio to sustainable investments. In order for the security to qualify as a sustainable investment, it must be classified as a “Leader” or “Outperformer” as determined by the Investment Manager using the ESG score generated by its proprietary process.

For further details of the exclusions applied by the Investment Manager at any time please refer to Section G below.

D. Investment Strategy

The Investment Manager, on behalf of the Fund, will invest actively using the Global Climate Transition Equity Strategy as further described in section 8.1 of the Prospectus and the Relevant Supplement. This strategy uses a proprietary fundamentally driven and bottom up research process to identify companies that the Investment Manager considers to offer the best combination of quality, durable growth and reasonable valuations that are positioned for the risks posed by climate change and the transition to a low-carbon economy.

In implementing this strategy, the Investment Manager builds a concentrated portfolio of 30-40 securities by evaluating an investee company’s climate positioning and transition plan. The securities in the Fund are selected primarily from the constituents of the Index and the Investment Manager applies the negative and norms-based ESG screen prior to the construction of the portfolio of the Fund and on an ongoing basis.

Application of the ESG screens results in the exclusion of any securities from the portfolio based on an assessment of their adherence to certain ESG criteria defined by the Investment Manager. The 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 companies associated with Severe ESG Controversies, controversial weapons, civilian firearms and tobacco. The Fund may use additional ESG screening techniques 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 assessment of good governance practices is implemented by the Investment Manager through the assessment of potential investments when implementing the Global Climate Transition Equity strategy. The Investment Manager deploys a proprietary quality assessment framework that includes governance criteria. The framework considers factors such as board independence, diversity, experience, executive compensation, code of conduct and anti-corruption policies, share class structure, and transparency. Good governance practices will improve a company's quality score in the Investment Manager's framework increasing the likelihood of investment. The assessment of good governance practices is further implemented through the negative screening utilised by the Fund. Companies deemed by the Investment Manager to not violate UNGC Principles are considered to exhibit good governance.

E. Proportion of investments

The Investment Manager employs a binding ESG methodology which aims to build a portfolio where at least 90% of the Fund's assets are invested in securities which are aligned with environmental and social characteristics promoted by the Fund. It is intended that, within such portion of the portfolio, at least 25 % of the Fund's assets are invested in securities which are sustainable investments with environmental and / or social objectives. The remaining portion (<10%) of the portfolio, consisting of cash as well as cash equivalents in place held at the Investment Manager's discretion, will not be aligned with the promoted environmental and social characteristics.

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 Taxonomy Regulation.

F. Monitoring of environmental or social characteristics

The attainment of the environmental characteristics is measured through a higher exposure of the Fund's portfolio (relative to the MSCI All Country World Index ("Index") to companies that have set emissions reduction targets aligned with climate science, as validated by the Science-Based Targets Initiative ("SBTi"). The SBTi is a partnership between CDP, the UNGC, World Resources Institution ("WRI") and the World Wide Fund for Nature ("WWF").

A further attainment of the environmental characteristics promoted by the Fund is measured through:

- % of the portfolio invested in securities that are included in the negative and norms based screen specifically related to environmental characteristics, namely companies violating UNGC Principles in regards to the environment and which are active in thermal coal, arctic oil & gas exploration, and oil sands extraction

The attainment of the social characteristics promoted by the Fund is measured through:

- % of the portfolio invested in securities that are included in the negative and norms based screen specifically related to social characteristics, namely companies violating UNGC Principles and companies associated with controversial weapons, civilian firearms and tobacco.

The environmental and social characteristics are embedded in the investment policy of the Fund and the associated sustainability indicators are monitored by the Investment Manager through its investment oversight program including pre- and post-trade compliance monitoring for ESG screens and regular reviews by a sub-committee of the Investment Manager.

G. Methodologies

The investment policy of the Fund is to invest actively to build a concentrated portfolio of 30-40 securities by evaluating an investee company's climate positioning and transition plan while screening out securities based on an assessment of their adherence to ESG criteria defined by the Investment Manager and described below.

The Fund uses the Investment Manager's proprietary fundamentally driven and bottom-up research process to identify companies that the Investment Manager considers to offer the best combination of quality, durable growth and reasonable valuations and that are well positioned for the risks posed by climate change and the transition to a low-carbon economy. For ESG specifically, each company in the investment universe is given a proprietary ESG score resulting from Investment Manager's fundamental due diligence process, with additional input from various external ESG data metrics, used to assess companies' ESG attributes, including ESG risks. Further, in relation to climate, based on the Investment Manager's proprietary research, the companies in the investment universe are assigned the following climate scores: (i) Climate Transition Score, (ii) Climate Risks Score and (iii) Climate Opportunities Score. The climate scores take into account disclosure, credibility and accountability of a company's transition planning and process (Climate Transition Score), an evaluation of the physical and financial risks associated with climate change (Climate Risks Score), and the resource intensity of a company's operations and green products, services and solutions (Climate Opportunities Score). The resulting climate scores allow the Investment Manager to assess companies' adherence to their stated climate goals as well as transition planning and progress.

ESG Screens

The ESG screens applied to the Fund include the following:
1. Controversial Weapons
2. UNGC Violations
3. Thermal Coal
4. Arctic Drilling
5. Oil and Tar Sands
6. Severe ESG Controversies
7. Civilian Firearms
8. Tobacco

Further details on the methodologies used for the ESG screens is as follows:

1. **Controversial Weapons:** Companies with focused involvement in the following controversial weapons are excluded.

Landmines Landmines are explosives that are designed to detonate at the presence, proximity or contact of a person or vehicle. After being planted, antipersonnel mines can remain undetonated for years, posing a serious risk to civilians after a conflict has ended.

Biological and chemical weapons Biological or chemical weapons are munitions that utilize pathogens such as viruses, bacteria, and disease-causing biological agents, toxins, or chemical substances that have toxic properties, to inflict death or harm. Either type can be dispersed in gas, liquid, or solid forms. As these munitions are based on organisms or chemicals, civilians are often unintended victims since the impact zone is constrained only by how far the particles can disperse. For biological weapons, person-to-person transmission of the illness can further exacerbate the civilian impact.

Cluster weapons Cluster weapons are air-dropped explosives: bombs, missiles, rockets, or shells that carry sub munitions and disperse them over an area. The sub munitions have a wide impact zone, and often remain undetonated on the ground. These munitions can remain dangerous for years after the conflict has ended, posing a serious risk to civilians.

Depleted Uranium Depleted Uranium (DU) munitions are projectiles (bullets, rockets, etc.) that have been equipped with the radioactive chemical substance DU, a byproduct of the uranium enrichment process used to make nuclear weapons and nuclear-reactor fuel. Because of its high density, DU is often used as a penetrator in ammunition to help pierce armor. However, areas where depleted uranium munitions have been used are exposed to its radioactive qualities, causing people living in the area to be more prone to cancers, congenital birth defects, and other illnesses.

Nuclear Weapons A nuclear weapon is a device that is capable of releasing nuclear energy in an uncontrolled manner, due to fusion and/or fission reactions, making it a highly destructive explosive. The indiscriminate and disproportionate impact on civilians makes nuclear weapons a controversial weapon.

White Phosphorus White phosphorus (WP) is an allotrope of the chemical element phosphorus, which burns fiercely when exposed to oxygen. A WP munition is any projectile (eg flares, grenades, or mortars) that is equipped with WP, in order to act as a smoke-producing agent, or as tracer, illumination, or incendiary munition.

2. **UNGC Principles:** Companies directly complicit in violations of core international norms and conventions, as described in the UNGC Principles are excluded.

The UNGC is the world's largest corporate sustainability initiative with 13,000 participants from 170 countries. It consists of a set of internationally recognized principles that encompass important issues, such as human rights, labour, the environment, and anti-corruption practices. The 10 principles are as follows:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

3. **Thermal Coal:** Companies involved in the extraction or power generation of thermal coal are excluded.

4. **Arctic Drilling:** Companies involved in oil and gas exploration in the Arctic regions are excluded.

5. **Oil and Tar Sands:** Companies for whom a meaningful portion of their average daily production comes from oil sands are excluded.

6. **Severe ESG Controversies:** Companies involved in incidents/events that may pose business or reputational risk due to the potential impact on stakeholders, the environment, or the company's operations are excluded.

7. **Civilian Firearms**: Companies involved in the manufacturing and/or retailing of small arms and associated ammunition/components for civilian use are excluded.

8. **Tobacco**: Companies thar are involved in the production and manufacturing of tobacco-related products are excluded.

The exclusion list generated by the ESG screening process is updated once per quarter.

The ESG screen methodology and screening criteria applied to the Fund are subject to SSGA's governance approval process.

H. Data sources and processing

The Fund utilises a proprietary ESG score generated by the Investment Manager's fundamental due diligence process, with additional input from various external data metrics derived from company filings and other publicly available sources, used to assess companies' ESG attributes, including ESG risks.

The Fund utilises SBTi data sourced from ISS.

The Fund utilises the following data sources to derive the ESG screens:

Controversial Weapons State Street Global Advisors receives universe-level data from two ESG screening data providers: Sustainalytics and MSCI. A screen is then applied to the data to generate lists from each data provider of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee. Companies are excluded if they appear on either or both of the lists from the two data providers.

UNGC Violations Data is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee

Thermal Coal Data is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

Arctic Drilling Data is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

Oil and Tar Sands Data is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee.

Severe ESG Controversies Data is sourced from Sustainalytics. A screen is then applied to the data to generate a list of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee

Civilian Firearms State Street Global Advisors receives universe-level data from two ESG screening data providers: Sustainalytics and MSCI. A screen is then applied to the data to generate lists from each data provider of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee. Companies are excluded if they appear on either or both of the lists from the two data providers..

Tobacco State Street Global Advisors receives universe-level data from two ESG screening data providers: Sustainalytics and MSCI. A screen is then applied to the data to generate lists from each data provider of excluded securities for this category. State Street Global Advisors determines the parameters that define the screen which are then approved by the firm's Investment Committee. Companies are excluded if they appear on either or both of the lists from the two data providers.

SSGA receives ESG data from a wide variety of data providers covering various themes including, but not limited to, climate, controversies and governance and leverages multisource data architecture for the analysis and dissemination of ESG data.

SSGA implements an ongoing due diligence process in relation to ESG data providers resulting in regular data quality reports. Such process tracks correlation and coverage dimensions of key ESG and climate metrics and scores between a selection of data providers over time for the covered universe. SSGA may engage with the relevant data providers in relation to any data issues identified by the SSGA teams.

I. Limitations to methodologies and data

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

The Investment Manager, on behalf of the Fund, will invest actively using the Global Climate Transition Equity Strategy as further described in section 8.1 of the Prospectus and the Relevant Supplement.

This strategy uses a proprietary fundamentally driven and bottom-up research process to identify companies that the Investment Manager considers to offer the best combination of quality, durable growth and reasonable valuations and that are well positioned for the risks posed by climate change and the transition to a low-carbon economy. As part of the fundamental research process, proprietary scores, based on several qualitative factors, are attributed to companies in the investment universe to form the basis for the Investment Manager's assessment of each company's quality. Each company in the investment universe is given a proprietary ESG score resulting from Investment Manager's fundamental due diligence process, with additional input from various external ESG data metrics, used to assess companies' ESG attributes, including ESG risks. Further, in relation to climate, based on the Investment Manager's proprietary research, the companies in the investment universe are assigned climate scores which take into account disclosure, credibility and accountability of a company's transition planning and process (Climate Transition Score), an evaluation of the physical and financial risks associated with climate change (Climate Risks Score), and the resource intensity of a company's operations and green products, services and solutions (Climate Opportunities Score). The resulting climate scores allow the Investment Manager to assess companies' adherence to their stated climate goals as well as transition planning and progress. The securities in the portfolio are selected primarily from the securities in the index. Non-index securities may be held in the portfolios. The Investment Manager employs a negative and norms-based screen prior to the construction of the portfolio and on an ongoing basis.

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 MSCI All Country World IIndex is a trademark of MSCI Inc.