

State Street Global Advisors Europe Limited

ESG Integration Statement

In accordance with Article 3 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”)

7 September 2023

This statement sets out how State Street Global Advisors Europe Limited (“**SSGAEL**”) considers sustainability risks as part of its investment decisions. “Sustainability Risk” is defined in SFDR as an environmental, social or governance event or condition which, if it occurs, could cause a negative material impact on the value of an investment.

ESG integration involves the assessment of Sustainability Risks and other financially material environmental, social, and governance (“**ESG**”) data and information during the investment process to develop a more complete picture of investee companies’ future financial trajectory and business risks.

Examples of Sustainability Risks which may have a material negative impact on the value of investments are as follows;

- Environmental: these risks may include climate change, carbon emissions, air pollution, water pollution, deforestation, rising sea levels or coastal flooding or wildfires;
- Social: these risks may include human rights violations, human trafficking, child labour, breaches of employee rights or gender discrimination; and
- Governance: these risks may include a lack of diversity at board level, infringement or curtailment of rights of shareholders, health and safety concerns for the workforce or poor safeguards on IT security.

Our Approach to ESG Integration by Investment Strategy

For information on how ESG is integrated by investment area please refer to the State Street Global Advisors [ESG Investment Statement](#).

SSGAEL manages a broad array of investment strategy types, including index and active strategies, across a wide range of asset classes. Depending on the investment approach required by our clients, financially material ESG data or information may be used to inform the portfolio or index construction, and/or monitoring processes of our portfolios and may also be used as part of our approach to risk management. Our ESG integration approach varies depending on the type of investment strategy chosen by our clients/adopted by the relevant fund.

Where appropriate and consistent with a fund or strategy’s disclosed investment objectives, sustainability related risks are identified and assessed throughout product and investment strategy lifecycles, through investment research and analysis, portfolio construction and management, investment risk management and stewardship.

In addition, where relevant depending upon the fund or strategy’s investment objective:

- The State Street Global Advisors Risk, Investment Oversight and Portfolio Management teams monitor and assess applicable ESG risks and their impact on the portfolio;
- ESG-related considerations are taken into account as part of the product governance and design process; and
- The ESG characteristics of the investment strategy are reviewed by the State Street Global Advisors Investment Strategy Review Committee, a sub-committee of the Investment Committee.