

State Street Global Advisors Europe Limited

EU Sustainable Finance Disclosure Regulation

No consideration of principal adverse impacts of investment decisions on sustainability factors

7 September 2023

For the purposes of disclosure in accordance with the EU Sustainable Finance Disclosure Regulation (“**SFDR**”), this document sets out disclosures by State Street Global Advisors Europe Limited (“**SSGAEL**”) in respect of the principal adverse impacts (“**PAI**”) of its investment decisions on sustainability factors.

SFDR requires financial market participants to “comply or explain” their decision whether to consider the PAI of their investment decisions on sustainability factors. SSGAEL is supportive of the policy aims of the PAI regime, to improve transparency to clients, investors and the market, as to how financial market participants integrate consideration of the adverse impacts of their investment decisions on sustainability factors. However, in accordance with Article 4 of SFDR, SSGAEL does not currently consider the PAI of its investment decisions on sustainability factors at an entity level. SSGAEL does not exceed an average of 500 employees during the financial year and, in accordance with SFDR, with this number of employees SSGAEL is not required to consider the PAI of its investment decisions on sustainability factors at an entity level. Taking into account the nature and scale of its activities and the types of investment product managed by it, SSGAEL’s current approach is to focus on reporting relevant PAI data at an investment product level for the following investment products that SSGAEL manages:

- Article 8: Investment products known as Article 8 investment products under SFDR, which promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices; and
- Article 9: Investment products known as Article 9 investment products under SFDR that have sustainable investment as their objective or a reduction in carbon emissions as their objective.

SSGAEL will continue to monitor the regulatory and market developments in this regard and will keep its decision not to consider the PAI of investment decisions on sustainability factors at an entity level under review.