STATE STREET GLOBAL ADVISORS

State Street Global Advisors Limited

MIFIDPRU Disclosure Statement

As of 31 December 2022

1. Objective

This disclosure statement (the "Statement") has been prepared by State Street Global Advisors Limited (the "Company" or "SSGAL"), London, United Kingdom to provide quantitative and qualitative information on the capital adequacy, governance arrangements, risk management and remuneration policies and practices of the Company. This Statement complies with the public disclosure requirements set out in Chapter 8 of the Financial Conduct Authority ("FCA") Handbook MIFIDPRU Prudential Sourcebook for MiFID Investment Firms ("MIFIDPRU").

SSGAL is regulated by the FCA and is classified as a non-small and non-interconnected ("non-SNI") MIFIDPRU investment firm with effect from 01 January 2022. The own funds requirement of the Company is the highest of:

- its permanent minimum capital requirement ("PMR");
- its fixed overheads requirement ("FOR"); or
- its K-factor requirement ("KFR").

Unless otherwise stated, the financial and regulatory disclosures in this Statement are based as at 31 December 2022. Certain information has been omitted from the Statement if, in the opinion of the management of SSGAL, such information is of proprietary nature, price-sensitive, may intrude the privacy of the Company's clients or would not change or influence the assessment or decision of market participants or other users of the Statement.

The document is updated and published annually. It will, however, be published more frequently if there are significant changes to the business such as changes to the scale of operations, range of activities and presence in different countries or financial sectors.

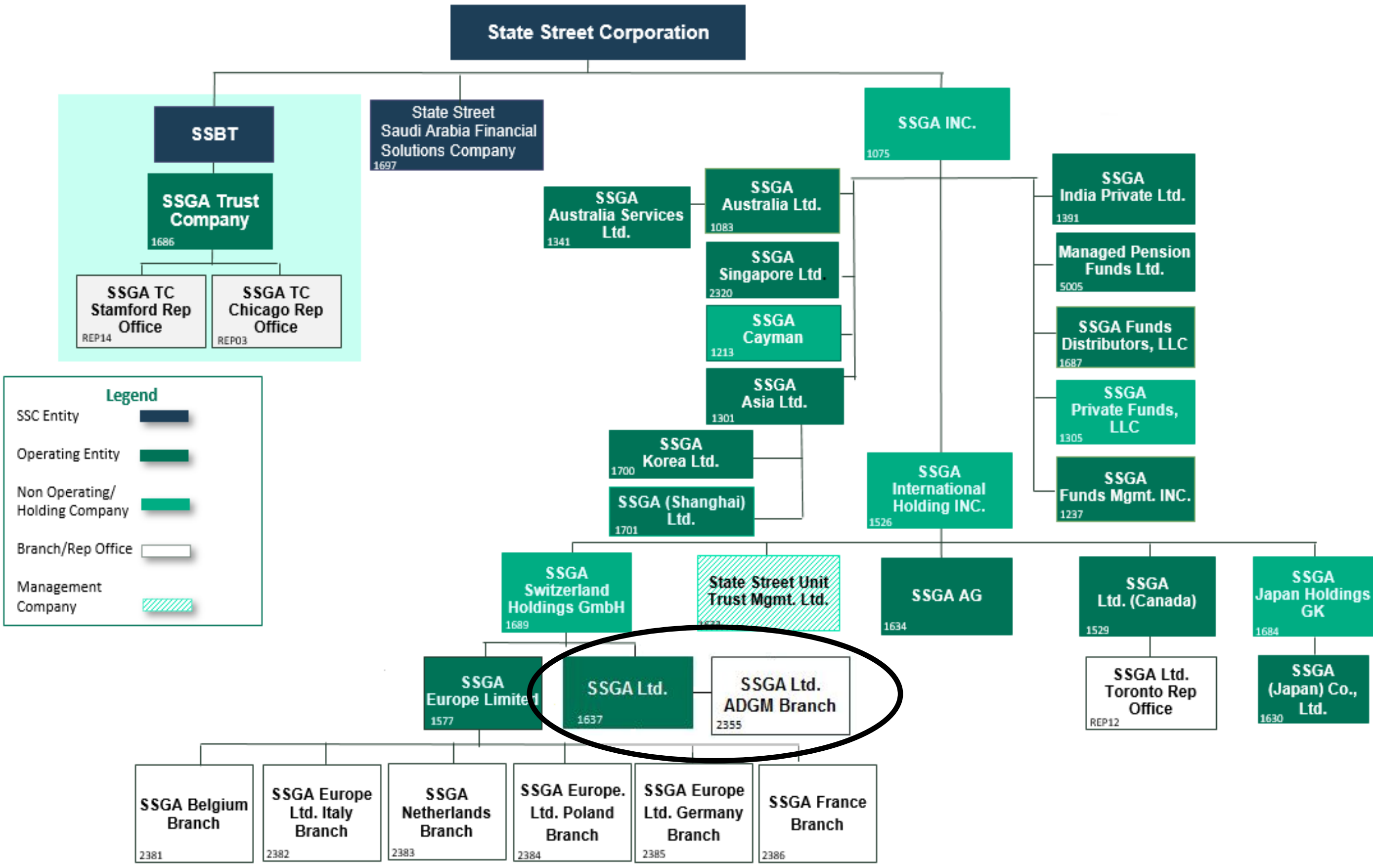
This document has been approved by the Board of Directors of SSGAL ("the Board") for publication on the State Street website www.statestreet.com. Copies of the statement are available at Company's main office located at 20 Churchill Place, Canary Wharf, London E14 5HJ.

2. General Information

2.1. Company Structure

SSGAL is a wholly owned direct subsidiary of State Street Global Advisors Switzerland Holdings GmbH ("SSGASHG"), and a wholly owned indirect subsidiary of State Street Corporation ("SSC"). SSC is subject to supervision and regulation by the Board of Governors of the Federal Reserve System among other US regulatory authorities.

The below diagram demonstrates, visually, the legal entity structure of SSGAL (referenced as SSGA Ltd), and its branch in relation to the hierarchy of the SSC organisation as at July 2022. The Abu Dhabi Global Market ("ADGM") branch of SSGAL provides client service and marketing services.



2.2. Business Profile

SSGAL is a large and diverse UK asset manager. The Company began operations in London in 1990 and provides a comprehensive range of investment management services to institutional investors and intermediary channel clients and its subsidiaries. The solutions the Company provides encompass a multitude of asset classes managed across the risk spectrum including index, enhanced and active strategies across equity, fixed income, cash and investment solution products.

A high proportion of SSGAL's assets are managed on an index basis. Net fees on index funds are relatively low, so it is crucial to ensure the business is managed efficiently and at a size where the scalability is appropriate for a sustainable level of profitability. However, SSGAL also recognises the importance of retaining and growing higher margin, active management products.

The Company acts as the largest business management and investment centre for SSGA Group activities across Europe. The Company provides investment management and investment advisory activities across a wide range of index and actively managed investment strategies to clients. This core activity has performed in line with peers and benchmarks over the period of economic stress, volatility, and dislocation in recent years. The Company retains client relationships through separately managed mandates, and mutual fund and pooled investments. The Company is currently the investment manager, or provides sub-advisory functionality, for SSGA fund umbrellas domiciled in the EMEA region. The sales and distribution branches in the United Arab Emirates offer the Company wider distribution capabilities

SSGAL is fully aligned to the SSGA Group Global Business Strategy. The Company contribute to SSGA Group's goal of becoming a global scaled Index and systematic investment manager, with strengths in Indexing, Cash and select active and multi-asset capabilities, underpinned by strong ESG capabilities.

Globally, SSGA continues to review and monitor its fund offerings as part of the lifecycle management of the pooled funds, which could result in additional future fund rationalisation / amendments as part of its business as usual activities.

SSGAL acts as investment manager and not as principal. It should be noted that SSGAL may also make investments in money market funds, where the principal objective is diversifying counterparty risk to the Company's capital. However, liquidity support is not provided to funds or clients by SSGAL.

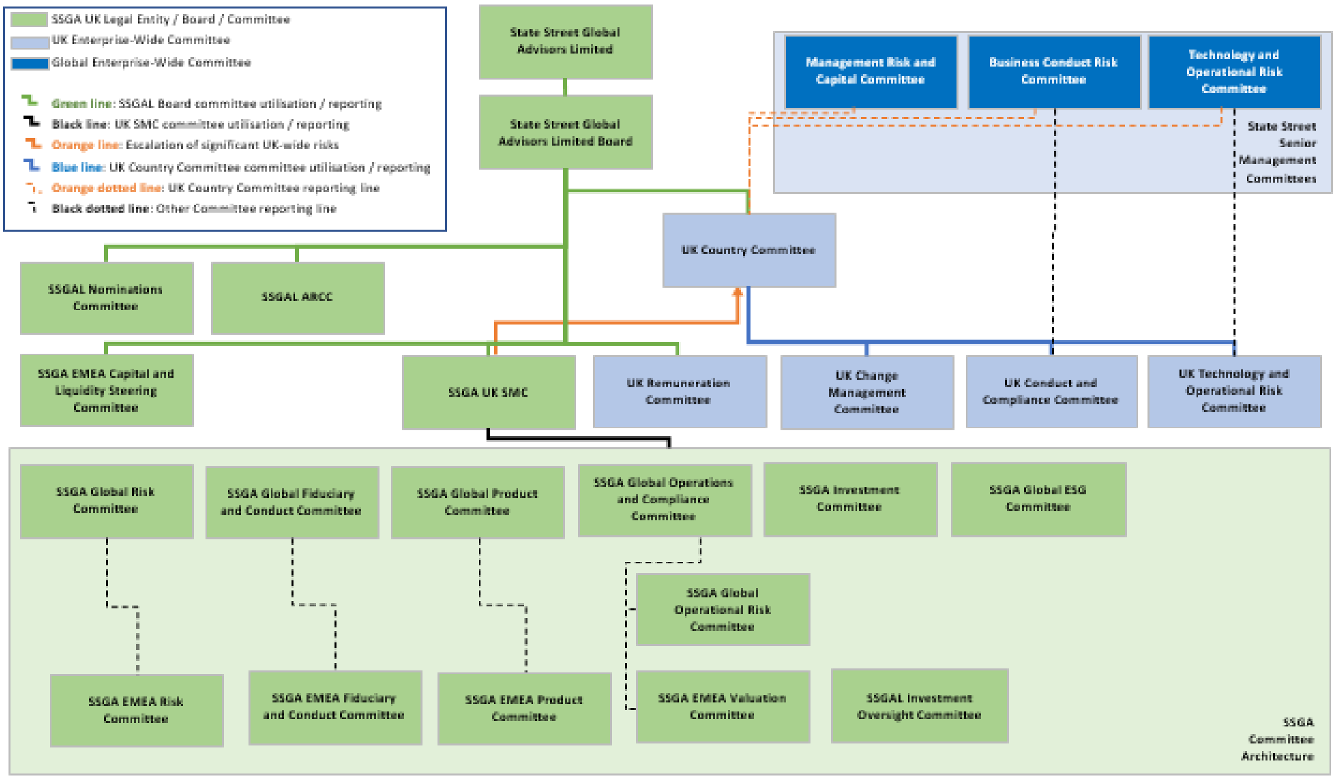
3. Governance and Risk Management Framework

3.1. Governance Framework

SSGAL's governance structure is designed to support effective decision making and enhance management oversight practices. The SSGAL Senior Management Committee ("SMC") oversees the activities of the SSGA UK businesses, which includes oversight of the business activities of SSGAL. The SSGAL SMC and the Company are also supported by SSGA's broader committee/governance structure, which includes committees focused on fiduciary and conduct, risk, new products, valuations and investments matters.

Significant matters are also escalated to relevant functional heads and to senior governing bodies as needed. For example, the Capital and Liquidity Steering Committee would escalate any capital or liquidity matters requiring attention to the respective Boards.

The following diagram sets out the governance structure of SSGAL, as it fits into the wider SSGA EMEA governance model, as at July 2022 :



SSGAL has also appointed a number of senior manager roles that are responsible for various areas of risk, including:

- The Chief Finance Officer (SMF 2) has responsibility for: (a) managing the firm's internal stress tests; and (b) ensuring the accuracy and timeliness of information provided to the FCA and other regulatory bodies for the purposes of stress testing.

- The SSGA EMEA Chief Risk Officer (assigned to SMF 4) has overall responsibility for the enterprise risk management function ("ERM") as it relates to SSGAL, which provides risk oversight, support and coordination to allow for the consistent identification, measurement and management of risks across business units separate from the business units' activities.
  - ERM is the independent second line control function responsible for identifying, measuring, monitoring and controlling material risks across the State Street businesses, including market, credit and operational risk. ERM develops and maintains the Risk Appetite Framework and Risk Appetite Statement and is responsible for the formulation and maintenance of corporate-wide risk management policies and guidelines.

3.2. Risk Management Framework ("RMF")

State Street's risk management framework ("RMF") is an important mechanism in ensuring risks are understood, owned and managed appropriately. The RMF consists of an integrated set of programs that complement each other, and each of which maintains policies, processes and tools to assist in controlling and measuring risk, and withstanding the financial impact from both, expected and unexpected, events. These programs include Material Risk Identification ("MRI"), Risk Control Self-Assessment ("RCSA"), Key Risk Indicators ("KRI") and Targeted Risk Assessments.

The RMF supports management in the alignment of business and risk management goals providing the foundation for consistency and sound risk management practice across State Street.

The structure of the RMF ensures that the Company's risks are:
Proactively identified. For a risk to be appropriately managed, it must first be identified. Reference is made to the SSC risk taxonomy, adapted for legal entity specific risks;
Well understood. As part of risk identification, need to promote a good understanding of how and why risks may materialise. This enables a more robust assessment of risks in terms of potential likelihood and impact; and
Prudently managed. Ultimately the Company works to ensure that risk-taking falls within Board-approved risk appetite and conforms to applicable policies, limits and guidelines.

3.2.1. How the firm assesses the effectiveness of its risk management process

The effectiveness of risk management is assessed through the results of the various programs using the below criteria;

- their usefulness for senior management and Board decision making;
- accuracy of risk identification in assessing the materiality of the risks Company is exposed to;
- appropriateness of risk limits in providing warning early enough for the Company to take effective action so as to prevent a risk appetite breach;
- the time taken to remediate a breach;
- effectiveness of controls to reduce the severity of a risk, or combination of risks, which have an adverse impact (financial or reputational) on the Company; and
- Company performance compared to prior years, as well as that of peers within the industry.

3.2.2. Risk Culture

State Street seeks to foster a culture in which staff are encouraged to escalate incidents as they are discovered. Upon becoming aware of a reportable incident, error, or breach, the manager must be immediately notified for recording of the incident onto the corporate wide incident capture system, complying with accuracy and timeliness standards.

Additionally all three lines of defence are responsible for the review, oversight or assessment of compliance with the Incident Capture and Management Policy and standards. Employees are required to escalate risks and control failures to the business and relevant support functions, who in turn may escalate to the Board.

There are a number of group corporate initiatives embedded which support the risk culture, whilst also reinforcing State Street values. These include:

- 'Standard of Conduct' policy and framework;
- 'Speak up, Listen up' activities aimed at raising challenge and escalating issues;
- 'Ethical Decision Making Framework' which supports decision making at all levels of the organisation; and
- regular 'Pulse Surveys' to monitor trends in the 'risk excellence' profile.

3.2.3. The Three Lines of Defence

Risk management is the responsibility of each employee, and is implemented through a three lines of defence framework.

The first line of defence ("FLOD") comprises of the business and functional units that identify, assess, manage and control the risks they are exposed to as a result of undertaking business activities. The FLOD ensures internal controls are established for effective risk management in line with risk policies, and promoting a strong culture of risk awareness.

The Business Risk Management Function in particular, a controls assurance team, focus on mitigating risks through control monitoring and improvement, and undertakes risk-based control reviews periodically. The function also reviews remediation steps and corrective action plans in order to facilitate solutions.

An effective control environment is supported with Business Risk Management Executives acting in a FLOD capacity.

The second line of defence ("SLOD") provide oversight and challenge to ensure understanding and alignment of RMF with the business strategy. SLOD also escalate risk management gaps, issues and concerns; and define and assist the business with embedding policies and standards, overseeing compliance with laws and regulations. Control functions which undertake an SLOD role include ERM and Compliance.

The third line of defence ("TLOD") comprises internal audit, which provides independent assessment of risk management and internal controls.

All lines of defence report to the board of directors and senior management, either directly through formal reporting or through delegated committees.

3.2.4. Risk Taxonomy

State Street's risk profile is articulated through ERM's Top Risk Framework, which forms a top-down view of the firm's most significant risk exposures based on the Corporate Material Risk Inventory that is compiled through a bottom-up risk identification process. The SSC taxonomy has been adapted for use at the legal entity level as shown in the Figure below. This serves as the framework used to articulate SSGAL business activities. Risks not applicable are marked as such, and legal entity specific risks are added in, namely Group and Pension Obligation risk.

Financial Risks	Non-Financial Risks	Business Risks
Investment Portfolio Mark-to-Market	Operational	Strategic
Interest Rate	Technology and Resiliency	Model
Trading (Market)	Core Compliance	Investment Management (SSGA)
Credit		
Liquidity		
Reputational		
ESG & Sustainability Risk		
Group		
Pension Obligation		

Risk not applicable

Legal entity specific

3.2.5. Risk Appetite Statement ("RAS")

The RAS describes the risks which are applicable to the Company and the level and types of risk it is willing to accommodate in executing its business strategy. As part of this, consideration is given to the risk appetite of SSC and SSGA Group, and the risk capacity of the entity which encapsulates the ability of the entity to withstand a material degradation to its capital and liquidity.

The RAS is established by ERM with qualitative and quantitative metrics to monitor risks. All metrics are assigned a risk owner, part of senior management, who is responsible for its effective management and reporting.

The RAS also sets out the process for reporting, escalating, approving and addressing exceptions to relevant committees, with responsibilities set in accordance with relevant Terms of Reference.

The Board formally reviews and approves the RAS on an at least annual basis.

The objectives of the RAS are to:

- Establish transparency on types and amount of risk the Company is willing to take in pursuing its objectives;
- Serve as a warning mechanism, allowing proactive action to manage and mitigate risk before it causes material harm;
- Ensure material risks are considered and integrated in strategic planning and day-to-day management of the business;

- Establish the quantitative limits and qualitative parameters to measure and monitor risk taking;
- Define responsibilities for measuring and monitoring risk against thresholds; and
- Define responsibilities for reporting, escalating, approving and addressing exceptions

3.2.6. Risk Management Objectives and Policies

Overall, SSGAL's approach to risk management is explained in section 3.2 but specific aspects are detailed below.

SSGAL analyses its capital need and liquid asset needs, as applicable, based on the potential manifestation of material harms as identified through the Material Risk Identification ("MRI") process and through the stress testing and wind-down assessments embedded in the Internal Capital and Risk Assessment ("ICARA") process.

SSGAL complies with MIFIDPRU 7.4 that states that a firm must have appropriate systems and controls in place to identify, monitor, and where appropriate, reduce all potential harms that may result from ongoing operations or winding down of business.

SSGAL's framework to control risk within tolerance levels established and documented in the legal entity Risk Appetite Statement.

1.1.1.1 Own funds requirement

SSGAL complies with MIFIDPRU 7.4.9, which states a firm must assess whether to hold additional own funds and additional liquid assets to address its material potential harms. Based on the material risks and potential harms identified, SSGAL considered its capital requirements based on its own internal assessment.

Additionally, SSGAL assessed there was no additional liquid assets needed from an ongoing operations perspective.

1.1.1.2 Concentration risk

Concentration risk is considered, as part of SSGAL's harms assessment of the ICARA process, as part of the credit risk, liquidity risk and business risks assessments.

Revenue Concentration – Client: Given the size, scale and scope of SSGAL's business lines, it is unlikely to experience concentration to a single customer or client type, whether that be from an AUM or revenue perspective. Diversification across businesses, geographical sectors, and risk types is an important consideration in managing risk and reducing earnings volatility. SSGAL also strives to avoid undue exposure and risk concentration in its activities in the ordinary course of business and in the event of geopolitical, macroeconomic and market shocks. Given therefore that the Company's exposure asset concentration is not material, this risk is currently monitored through management reporting.

Revenue Concentration - Geographic: SSGAL's client base has a diverse international spread albeit there is a concentration in UK-domiciled clients with the remainder spread globally across Europe, the Middle East, Africa, North America and Asia. The spread of asset classes invested in by the clients provides the Company with a degree of protection against product concentration and adverse market movements across the book of business.

Asset Concentration: Concentration risk can arise in the Company's exposure to financial institutions where funds are held on deposit. The risk from concentration of deposits with financial institutions is managed by monitoring the percentage of aggregate cash balances held with a single counterparty and considering how this relates to the risk appetite of the Company. To mitigate its exposure to credit risk, the Company invests a significant portion of its regulatory capital in a SSGA Money Market GBP Fund ("MMF").

1.1.1.3 Liquidity

SSGAL Liquidity Profile

Liquidity risk is considered, as part of SSGAL's harms assessment of the ICARA process.

Liquidity risk is the risk that the firm will not be able to meet its current and future cash flow obligations without materially affecting its daily operations or overall financial conditions. A firm must at all times maintain liquidity resources which are adequate, both as to amount and quality, to ensure that there is no significant risk that its liabilities cannot be met as they fall due in both business-as-usual and stress conditions.

The application of the relevant regulatory liquidity rules is shaped by the activities SSGAL performs. In this regard it should be noted that:

a. SSGAL does not hold client assets or client money, nor does it engage in proprietary trading, its client base being entirely institutional or intermediary;
b. SSGAL does not trade as principal in its own funds;
c. While SSGAL acts as an investment manager for State Street Unit Trust Management Ltd and Managed Pension Funds Ltd, it does not receive, nor does it provide any liquidity support from/to these entities or any of the underlying products or investments. SSGAL acts in a pure fiduciary capacity;
d. The SSGAL balance sheet is relatively simple with cash placed with banks and with the MMF representing the main asset balance and accrued expenses the main liability balance; and
e. SSGAL does not have any off-balance sheet positions e.g. provision of lending commitments or facilities which may trigger contingent liquidity demand.

SSGAL has a liquidity risk metrics inventory, used to measure, control and monitor liquidity risk.

SSGAL's liquidity risk appetite is reassessed in the event of any SSGAL Board approved new or material changes to products and services (i.e. new business lines not new funds, which are generally expansions of existing business products and services) as well as where there may be changes in the underlying business environment that materially impacts SSGAL's risk profile. In addition, the Liquidity Risk Appetite and metrics inventory would be subject to review in the case of a material liquid asset change.

3.3. Governance Arrangements for the prudent management of the Firm

The Board defines, oversees and is accountable for implementing governance arrangements to promote the effective and prudent management of the firm. Potential conflicts of interest at the Board level are disclosed at the start of each Board meeting. The Management Responsibility Map sets out the roles and responsibilities of the senior managers. The firm operates a three-lines of defence model, with separation of responsibilities for Compliance, Risk and Audit separated from those of the Business, ensuring the independence of the risk oversight reporting.

Within the organisation, system access controls are designed to prevent permission combinations that conflict with the effective segregation of duties. For example, these controls seek to separate roles such as portfolio managers, traders and settlement staff with the aim of promoting the integrity of markets and preventing harm to clients. Regular reviews and audits of confliction permissions take place.

The Board is engaged throughout the risk management process, defining and approving both the business strategy and risk appetite. Performance against the business strategy and the defined risk appetite levels are monitored through the Audit, Risk and Compliance Committee of the Board, with escalation of material issues escalated to the Board as necessary.

3.4. Disclosure of other directorships

The number of other directorships held by each member of the Board is as follows:

Alex Castle:	0
Julie Currie:	2
Scott Sanderson:	0
Karen Sharpe:	1
Ted Sotir:	1
Alistair Byrne (subject to regulatory approval):	2

Please note the above does not include executive and non-executive directorships held in organisations which do not pursue predominantly commercial objectives; nor does it include executive and non-executive directorships held within the same group or within an undertaking (including a non-financial sector entity) in which the firm holds a qualifying holding.

3.5. Disclosure of Board Diversity Policy

SSGAL is committed to developing, supporting and preserving a culture of diversity and inclusion and recognises that the collective sum of our individual differences represents a significant part of not only our culture but our reputation and achievements.

SSGAL recognises that having diverse boards is important in providing a range of perspectives, insights and challenge necessary to support good decision making and to achieve more for our clients and our business.

SSGAL’s aspiration is to have Boards that are representative of all aspects of diversity.

SSGAL’s priority is to ensure that the Boards continue to have strong leadership and the balance of skills necessary to deliver the business strategy. The representation of women and non-executives on the Boards will necessarily vary from time to time.

SSGAL has targets relating to diversity and continues to seeks to achieve these targets and track progress against them at different levels of the firm.

On gender diversity, SSGALs current target is to achieve 40% representation of women on the Board by end-2022 and this has been achieved.
SSGAL also maintains and publishes, on an annual basis, a Gender Pay Report which sets out the firm’s progress in relating to achieving its goals around diversity. In particular, the main areas are:

- Hiring and Compensation Practices
- Mentoring and Development
- Training Talent Marketplace

- Hybrid Work

3.6. Disclosure of risk committee

The Company has an Audit, Risk and Compliance Committee (the “ARCC”), authorised by the Board, which is responsible for providing advice to the Board on three key areas: Audit, Risk, and Compliance. From a risk perspective, the ARCC is responsible for providing oversight of the Company’s overall current and future risk appetite and strategy, and assisting the Board in overseeing the implementation of that risk appetite and strategy by senior management.

4. Capital

4.1. Own Funds

The own funds of SSGAL, determined in accordance with the provisions set out in MIFIDPRU 3, as at 31 December 2022 are £226 million.

The own funds of the Company consist of common equity tier 1 (“CET1”) capital. The Company has no additional tier 1 capital and tier 2 capital. The components of CET1 capital with applicable deductions as at 31 December 2022 are as follows.

Own Funds Table:

Composition of regulatory own fund			
	Item	Amount (in £'000)	Reference ID in audited financial statements (Balance Sheet)
1	OWN FUNDS	226,503	
2	TIER 1 CAPITAL	226,503	
3	COMMON EQUITY TIER 1 CAPITAL	226,503	
4	Fully paid up capital instruments	62,350	Called up share capital
5	Share premium	-	
6	Retained earnings	172,295	Profit and loss account
7	Accumulated other comprehensive income	-	
8	Other reserves	9,821	Capital contribution, Revaluation reserve, Tax- share based payment
9	Adjustments to CET1 due to prudential filters	-	
10	Other funds	-	
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	-17,963	Goodwill and Intangible assets, Deferred tax assets
19	CET1: Other capital elements, deductions and adjustments	-	
20	ADDITIONAL TIER 1 CAPITAL	-	
21	Fully paid up, directly issued capital instruments	-	
22	Share premium	-	
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	-	
24	Additional Tier 1: Other capital elements, deductions and adjustments	-	
25	TIER 2 CAPITAL	-	
26	Fully paid up, directly issued capital instruments	-	
27	Share premium	-	
28	(-) TOTAL DEDUCTIONS FROM TIER 2	-	
29	Tier 2: Other capital elements, deductions and adjustments	-	

SSGAL has 77 million authorised ordinary shares of £1 each, out of which the allotted, called up and fully paid share capital is £62.35 million. The fully paid up capital is treated as the regulatory CET1 capital and reported as the Shareholders' Funds in the audited financial statements of the Company for the year ended 31 December 2022. The holders of ordinary shares are entitled to receive dividends as declared from time to time, and are entitled to one vote per share at meetings of the Company. The shares do not confer any rights of redemption.

A reconciliation of own funds of the Company with capital and reserves reported in the audited financial statements for the year ended 31 December 2022 is as follows.

Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements			
		Balance sheet in audited financial statements (Amount in £'000)	Cross reference to Own Funds Table
Assets			
	Non Current Assets		
1	Goodwill and Intangible assets	13,511	Item 11
2	Tangible fixed assets	55	
3	Deferred tax assets	4,451	Item 11
4	Other debtors	5,275	
		23,293	
	Current Assets		
5	Trade debtors	3,241	
6	Other debtors	5,518	
7	Amounts due from other group undertakings	11,153	
8	Prepayments and accrued income	11,872	
9	Current tax receivable	290	
10	Other financial investments	158,039	
11	Cash	68,624	
		258,738	
	Total Assets	**282,031**	
Liabilities			
	Creditors falling due within one year		
1	Trade creditors	437	
2	Amounts due to other group undertakings	943	
3	Other creditors including social security and PAYE	5,991	
4	Accruals and deferred income	29,980	
		37,351	
5	Provisions for liabilities	215	
	Total Liabilities	**37,565**	
Shareholders' Equity			
1	Called up share capital	62,350	Item 4
2	Capital Contribution	9,300	Item 8
3	Revaluation reserve	110	Item 8
4	Tax- Share based payment	411	Item 8
5	Profit and loss account	172,295	Item 6
	Total Shareholders' Equity	**244,465**	

4.2. Own Funds Requirement

The own funds requirement of SSGAL, determined in accordance with the provisions set out in MIFIDPRU 4.3, as at 31 December 2022 is £47 million.

SSGAL is a non-SNI MIFIDPRU investment firm. Therefore, own funds requirement of the Company as at 31 December 2022 is the highest of:

£75k PMR, which is based on the investment services and activities SSGAL is authorised to carry on by the FCA;
£21 million FOR, which is a quarter of SSGAL's audited fixed overheads for the year ended 31 December 2022; or
£47 million KFR, which is the sum of K-AUM and K-COH requirement as at 01 December 2022.

Permanent Minimum Capital Requirement

SSGAL is not permitted to hold client money or client assets in the course of its MiFID business and has not been appointed to act as a depositary. The Company is permitted to carry out the following MiFID investment services and activities and therefore PMR of the Company is set at £75k in accordance with the provisions of MIFIDPRU 4.4.4.

reception and transmission of orders in relation to one or more financial instruments;
execution of orders on behalf of clients;
portfolio management; or
investment advice.

Fixed Overhead Requirement

The fixed overheads requirement is an amount equal to one quarter of the Company's relevant expenditure during the preceding year. The FOR of £21 million is based on audited fixed overheads for the year ended 31 December 2022 and has been calculated in accordance with the provisions set out in MIFIDPRU 4.5.

K-Factor Requirement

SSGAL is engaged in discretionary portfolio management services and receipt and transmission of orders on behalf of clients. Therefore, SSGAL calculates K-AUM and K-COH requirement on the first day of the month in accordance with the provisions set out in MIFIDPRU 4.7 and 4.10. SSGAL is not authorised to deal on own account, hold client money or client assets. Therefore, other K-Factors are not applicable to SSGAL.

SSGAL calculates the amount of average AUM by taking the total AUM as measured on the last business day of each of the previous 15 months excluding the 3 most recent monthly values, and then taking the arithmetic mean of the remaining 12 monthly values. The K-AUM requirement of the Company as at 01 December 2022 is £46 million, which is equal to 0.02% of the average AUM.

The K-COH requirement is equal to the sum of 0.1% of average client orders handled attributable to cash trades and 0.01% of average client orders handled attributable to derivatives trades. SSGAL calculates the amount of its average client orders handled by taking the total client orders handled measured throughout each business day over the previous 6 months excluding the daily values for the most recent 3 months. Then, the arithmetic mean of the daily values of the remaining 3 months is taken. The K-COH requirement of the Company as at 01 December 2022 is £1 million.

The own funds, own funds requirement and capital surplus of SSGAL as at 31 December 2022 are as follows.

Own Funds and Requirement	Amount (in £'000)
Own Funds (A)	**226,503**
Own Fund Requirement (B)	**47,946**
being the higher of :	
Permanent minimum capital requirement	75
Fixed overheads requirement	21,973
K-Factor Requirement	47,946
K-AUM requirement	*46,311*
K-COH requirement	*1,635*
Capital Surplus (A-B)	**178,557**

4.2.1. Overall Financial Adequacy Rule

SSGAL is required to internally assess and maintain adequate amount of own funds and liquid assets in order to remain financially viable throughout the economic cycle, with the ability to address any material potential harms that may result from its ongoing activities; and to wind-down in an orderly manner, minimising harms to clients or to other market participants.

This assessment is performed annually as a part of the ICARA process and is subject to comprehensive review of all significant risks relevant to SSGAL and is based on wide consultation with different functions.

In addition to the regulatory capital requirement, SSGAL maintains an internal capital target set by the Board. The impact of any significant business decisions on the internal capital of SSGAL is fully assessed in order to achieve a suitable capital surplus is maintained in line with that approved by the Board.

5. Remuneration Practices and Policies (according to MIFIDPRU 8.6)

5.1. Remuneration Governance

At the State Street Group level, the Human Resources Committee ("HRC") of SSC, has oversight of the overall compensation system at State Street (the HRC's Charter is available on State Street's website). The HRC consists of at least three members who are senior professionals with strong financial/ business knowledge and are independent members of the Board of SSC, in accordance with the listing standards of the New York Stock Exchange. They are appointed by the Board on the recommendation of the Nominating and Corporate Governance Committee of the Board. At 31 December 2022, there were six (6) members of the HRC. During 2022, the HRC held ten (10) meetings.

The HRC oversees all of State Street's compensation plans, policies, and programs in which senior executives participate and incentive, retirement, welfare and equity plans in which senior executives and certain other employees of SSC participate. It also oversees the alignment of the incentive compensation ("IC") arrangements with State Street's financial safety and soundness consistent with applicable related regulatory rules and guidance.

The HRC reports or causes management to report periodically to the Board's Risk Committee ("RC") any activities undertaken by the HRC involving the oversight of any SSC risks and related policies that support the RC's overall oversight of SSC's global risk management framework. The HRC may meet in joint sessions with other committees of the Board from time to time to discuss areas of common interest and significant matters. The HRC engages Meridian Compensation Partners, a compensation consulting firm, to provide compensation consulting as part of the HRC's review of executive compensation.

The corporate Incentive Compensation Control Committee ("ICCC") serves as a forum for the risk management and internal Control Functions to formally review and provide their assessment of IC arrangements throughout the State Street Group and consists of senior representatives of the ERM, Compliance, Internal Audit, Finance, Legal, and Global Human Resources ("GHR") departments. This review and assessments are intended to promote the consistency of the IC arrangements with the safety and soundness of State Street and its subsidiaries and the alignment of these arrangements with applicable regulatory guidance and regulations. The ICCC is supported by a working group comprised of GHR, Legal and other subject matter experts, which provides analytical and operational support to the ICCC. The ICCC meets on a regular monthly schedule and otherwise, as needed.

In addition to that the integrated, systemic role Control Functions have in IC practices through the ICCC, State Street's risk identification and assessment processes are managed by ERM. The HRC evaluates a corporate multi-factor risk scorecard, developed by ERM, which is used to measure firm-wide risk performance. The scorecard equally considers financial and non-financial risks, and reflects ERM's views of State Street's current risk positioning, capabilities, and remediation status for each risk The scorecard is overseen by the RC and is used by the HRC as an input into State Street's corporate IC pool size process. This allows the HRC to holistically evaluate State Street's performance against risk management, objectives, and goals. In addition, State Street Group's Audit function regularly completes an audit of GHR IC practices and compliance with regulatory guidance.

State Street has a separate, independent, UK Remuneration Committee ("UK RemCo") which held four (4) meetings in 2022. It is comprised of three State Street Executive Vice Presidents ("EVPs") appointed by the HRC who do not perform an executive role in relation to the UK businesses under the remit of the UK RemCo. The UK RemCo operates under a charter that sets out its mission, scope, authority, composition, frequency of meetings and reporting obligations.

The UK RemCo reviews and reassesses the adequacy of its charter annually. Under this charter, the UK RemCo's primary duties are:

Oversight of the process for identifying and determining the remuneration of Investment Firms Prudential Regime ("IFPR") Identified Staff [1];
Oversight of decisions made by those with authority to determine the remuneration of IFPR Identified Staff; and
Holistic overview of regional remuneration matters, with a view to providing a central forum for consideration of issues and thereby enhancing consistency of approach across State Street EMEA

5.1.1. State Street Global Advisors Limited's Remuneration Governance

In light of the global nature of State Street's organisation, State Street's remuneration plans and programs are generally established at the level of SSC and implemented locally/regionally to comply with the applicable local legal and regulatory requirements. Therefore, the UK remuneration policy, which is applicable to SSGAL, reflects the nature of SSC's global remuneration approach while complying with local/regional regulatory remuneration requirements that are applicable for SSGAL and those performing activities on behalf of SSGAL. SSGAL only makes use of remuneration-related plans and programs that exist at the SSC level. As described above, SSGAL, therefore, also benefits from State Street's global and EMEA remuneration governance, including the UK RemCo.

1 IFPR Identified Staff is the State Street internal nomenclature for Material Risk Takers under IFPR

5.2. IFPR Identified Staff

SSGAL identifies those employees who individually or as a group can expose SSGAL to material amounts of risk (i.e., IFPR Identified Staff). State Street annually reviews the variable pay arrangements used to compensate these employees and also annually reviews the effectiveness of the design and operation of State Street's IC system in providing risk-taking incentives that are consistent with the organisation's safety and soundness. IFPR[2] came into force for in-scope MiFID investment firms on 1 January 2022 with effect from the 2022 performance year and included its own identification criteria.

5.2.1. Identification Governance

State Street takes a robust approach to identifying IFPR Identified Staff within its businesses and subsidiaries. Various key bodies are involved in the process of identifying, reviewing or approving State Street's IFPR Identified Staff. These key groups include the following:

- UK RemCo – this body represents the ultimate oversight governing body for the IFPR Identified Staff identification process;
- CEO of SSGAL – has the ultimate responsibility for compensation decisions including those impacting IFPR Identified Staff for SSGAL and conducts a review of those individuals on the Identified Staff list
- Business & Corporate Function Heads – Review inputs, confirm and approve final lists for respective areas; and
- Identified Staff Advisory Group – this Advisory Group meets during the year to perform technical analysis and make recommendations for the identification of the IFPR Identified Staff. In 2022, State Street's senior stakeholders in EMEA functions represented were Total Rewards/HR (Chair), ERM, Compliance and Legal.

5.2.2. Identification Process

The identification of IFPR Identified Staff and the governance of that process is conducted using the regulatory criteria under IFPR. If an employee is performing professional services for SSGAL (regardless of employing entity) and meets any of the identification criteria then the employee is classified as Identified Staff under IFPR.

In line with the IFPR criteria a detailed review process is performed for each individual, considering their role, responsibilities, independent authority and potential ability to impact main risks of any of the in-scope entities, on a solo or consolidated basis, to determine if an individual should be IFPR Identified Staff.

All decisions to include someone as IFPR Identified Staff are documented and made as part of a multi-layered review process, with sign offs obtained (in addition to the governance bodies above) from the Head of the relevant Business or Function from which the IFPR Identified Staff has been identified, with supporting input from other senior representatives of the business or function who may be closer to the IFPR Identified Staff member and their role

5.3. Information on the link between pay and performance

2 https://www.handbook.fca.org.uk/handbook/MIFIDPRU/8/6.html

State Street's overall aim with respect to compensation is to reward and motivate high-performing employees and to provide competitive incentive opportunities, encouraging employees to learn and grow in their careers.
There are seven key remuneration principles that align State Street's remuneration system with the business strategy:

We emphasise total rewards
We target the aggregate annual value of our Total Rewards Program to be competitive with our business peers
We unequivocally support equal pay for work of equal value
Funding for our Total Rewards Program is subject to affordability and is designed to be flexible based on corporate performance
We differentiate pay based on performance
We align employees' interests with shareholders' interests; and
Our compensation plans are designed to comply with applicable regulations and related guidance, including aligning incentive compensation with appropriate risk management principles

5.3.1. Elements of Remuneration

Fixed Pay

5.3.1.1. Base Salary and Benefits

Base salary is one element of an employee's compensation. Employees' base salaries are determined by role, bank title and by a number of other factors such as individual performance, proficiency level, year-over-year increase guidelines, statutory requirements, budget and position to market.

Benefits, both in form and value, are generally positioned at the median of relevant business peer groups and geographic markets. Most benefits are generally consistent across all job grades in a market, although sometimes benefits may vary by job grade or other factors based on prevailing market practices or applicable regulations.

5.3.1.2. Role Based Allowance ("RBA")

RBAs are contractual elements of fixed compensation for a very limited number of individuals to permit State Street to deliver compensation that is reflective of an individual's role, responsibility, experience, the competitive marketplace and is in compliance with its regulatory obligations. The key characteristics are:

- Contractual cash payment, i.e. non-discretionary
- No fixed term, i.e. continuous
- Paid in equal instalments
- Not subject to deferral or performance conditions
- Amount or receipt of an RBA subject to review only if there is a material change in role and responsibilities
- Not subject to risk-based adjustment (e.g., malus/ clawback); and
- Subject to comparable role analysis

Variable Pay

Remuneration at State Street is designed to achieve a balance between fixed and variable components with those performing Control Function roles having their remuneration delivered with an emphasis on fixed pay. In jurisdictions where there is an expectation to have a prescribed maximum ratio between fixed and variable remuneration under relevant remuneration regulations, State Street maintains governance processes to oversee compliance with those established limits.

5.3.1.3. Incentive Compensation Plan ("IC plan")

Except for a small number of individuals who participate in a Structured Incentive Plan ("SIP") and those who participate in State Street Global Advisors' IC plan[3], all State Street employees are eligible to participate in the IC plan. The IC plan is an integral part of the remuneration strategy. It is the primary scheme for the provision of annual discretionary bonuses and is intended to motivate staff to perform as well as possible and produce superior results whilst not incentivising inappropriate risk-taking. To be eligible to receive an award, employees must be employed and in good standing on the date of the total funded IC plan pool results are certified.

EVPs generally have an IC target structure to provide additional structure for determining Incentive Compensation. The targets are based on each executive's role and responsibilities, performance trend, competitive and market factors and internal equity. The payout may vary within a range of 0 – 200% and is determined based on corporate and individual performance.

For the 2022 performance year, Performance-Based Restricted Stock Units ("PRSUs") were also granted to EMEA EVPs. The number of PRSUs earned is based on financial metrics with risk adjustment factored into the calculation of PRSUs eligible to vest, if any, under the applicable PRSU award. The PRSU payout varies within a range of 0% to 150%.

5.3.1.4. Structured Incentive Plans ("SIPs")

A small number of employees participate in SIPs, which aim to bring the variable compensation granted to plan participants in line with the financial results they generate. SIPs also take into account non-financial qualitative performance indicators. In addition, all SIP participants receive sufficiently high fixed compensation, which aims to eliminate incentives for excessive risk-taking. Variable compensation is allocated on an individual basis by way of a review of both quantitative and qualitative factors. All SIPs are reviewed annually by State Street's corporate ICCC. An employee's eligibility to participate in a SIP, and all amounts paid under a SIP, are subject to management approval.

5.4. Characteristics of the remuneration system, including information on the criteria used for performance measurement and risk adjustment, deferral policy and vesting criteria

5.4.1. Link between pay and performance for the institution

The corporate IC pool is budgeted and accrued based on group-wide financial, business, and risk management performance. The HRC has flexibility to adjust the overall global IC pool and in doing so, evaluates a number of factors including company performance, market trends, and other considerations. The HRC approves the funding of the corporate IC pool.

5.4.2. Link between pay and performance for Business Units

State Street's Global Chief Executive Officer allocates IC pools to Executive Committee members for their Business Units or Corporate Functions based upon similar factors that the HRC considers, as described above, but measured at the level of the Business Unit or Corporate Function. The discretionary Business

3 SSGAL employees who report up to the SSGA CEO have a separate IC plan that is funded through a separate program. Funding for the program is determined by the administrators and approved by senior management, according to the terms and conditions of the SSGA IC Program.

Unit allocation process entails the use of a Business Unit-level risk scorecard, which captures qualitative and quantitative data across ERM, Audit, Compliance, Legal and Regulatory areas for every Business Unit and Corporate Function. Details on State Street's Compensation Assessment Framework and Corporate Performance can be found in State Street's 2022 Proxy Statement filed with the US Securities Exchange Commission and available publicly on its website.

5.4.3. Link between pay and performance for individuals

Third, the sub-allocation of the Business Unit bonus pool to an individual is then further determined by an individual's business manager with reference to the individual's performance measured on both financial and non-financial criteria. Individual accountability for Business Unit scorecard results (positive or negative) is assessed as appropriate and may also inform compensation decisions.

Individual incentive awards are completely discretionary. In addition to the formal two-pronged risk adjustment process (ex-ante and ex-post compensation adjustments) described below, in making individual incentive awards, State Street permits the use of discretionary adjustments to awards for both financial and non-financial criteria. These include (but are not limited to) compliance and risk performance factors such as non-compliance with internal policies and procedures or significant audit findings, instances where there is a significant downturn in the financial performance or a material risk management failure in respect of State Street or a material Business Unit.

5.5. Performance Management System

State Street's performance management process involves a collaborative planning process and ongoing assessments, enabling flexibility to account for evolving business priorities, more opportunities for professional challenge and discussions on risk excellence and better performance differentiation across the workforce.

Performance management at State Street utilises a four-stage approach:

Performance Priorities: At the beginning of the year, managers and employees collaboratively set the employee's Performance Priorities. Performance Priorities are personalised goals which are shorter term in nature, unique to the employee, and align with corporate goals and strategy, business unit goals, and our culture traits.

Monthly Check-Ins: Managers are expected to have Monthly Check-Ins with each of their direct and dual reports. These coaching conversations that provide managers and employees opportunities to review progress against existing Performance Priorities and make updates when necessary.

Snapshots: Managers evaluate employee progress against Performance Priorities and other performance components twice each year using assessments called Snapshots. Snapshot outcomes and commentary are made available to employees at the conclusion of the process.

Year-End Performance Summary: At year-end, managers assign employees a Year-End Performance Category to provide a holistic summary of the employee's performance for the year. The Performance Categories are Frequently Exceeded, Sometimes Exceeded, Achieved, Partially Achieved, Underperformed, and New Hire/Not Rated.

Like Snapshots, year-end performance outcomes are made available to employees at the conclusion the process. This Performance Category is summarised during a year-end Monthly Check-In which includes a recap of the performance feedback the manager provided to the employee throughout the year.

Final Year-End Performance Categories are used by managers during the Total Compensation Planning ("TCP") process to prioritise employees for salary increases and incentive compensation ("IC") decisions. Managers also consider business and company performance, an employee's competitive position relative to compensation ranges, affordability, and any Risk Excellence considerations

5.5.1. Structure of variable remuneration awards under State Street's corporate design

For the 2022 performance year, IC awards under State Street's corporate design consisted of Deferred Awards[4] and immediate cash payments.

Under State Street's corporate design, all Deferred Awards are subject to a four-year deferral period and vest on a quarterly basis without the application of a retention period.

Deferred Equity is awarded in the form of DSAs. DSAs are a contractual right to receive, on each vesting date, a set number of shares in the common stock of SSC, subject to affordability requirements and applicable terms, which may include malus, clawback, forfeiture, restrictive covenants and other conditions. The number of shares to be delivered on each vesting date is set at the award date, but may be adjusted between the award date and each vesting date through the ex-post performance adjustment measures described below.

In order to reduce employee concentration in State Street stock that would result from using equity instruments alone to deliver the entirety of the Deferred Awards, State Street also uses non-equity deferral vehicles, called the SSGA Long-Term Incentive Plan ("SSGA LTIP") for those in the SSGA business. The SSGA LTIP notionally tracks to the value of a money market fund.

For most active investment teams, the SSGA LTIP award notionally tracks the performance of a set of funds managed by the team during the deferral period. For the remainder of the population, including SSGA corporate or Control Functions, State Street offers Deferred Value Award ("DVA") that notionally track the value of a money market fund. SSGA LTIP and DVAs are delivered in cash on the vesting date. The earnings credited to the DVAs vary based on the actual performance of fund. However, there is no ownership interest in the fund or any other actual investment. Earnings generally result in the credit of additional notional units as the money market fund is managed to a $1.00 USD unit price. As with DSAs, SSGA LTIPs and DVAs may be adjusted between the award date and each vesting date through the ex-post performance adjustment measures described below.

Under State Street's corporate design the allocation of immediate (i.e., cash) and Deferred Awards is based on total value of an individual's 2022 IC. In general, the greater the amount of IC, the greater the percentage that is paid as Deferred Awards. The Deferred Award is typically composed of equal percentages of SSGA LTIPs/DVAs and DSAs, resulting in employees at higher variable pay levels being awarded a higher percentage of equity, given their higher deferral percentage. However, employees at Associate level typically receive IC entirely in immediate cash.

5.5.2. Structure of IC awards for IFPR Identified Staff

The IFPR Identified Staff for SSGAL are subject to the standard remuneration rules based on the nature of those businesses and levels of assets. As such, the prescriptive structural payout rules are not applied to IC delivery of the Identified Staff, however malus and clawback are applied for the duration of the deferral period.

4 Deferred Stock Awards ("DSA"), SGGA Long-Term Incentive Plan ("SSGA LTI"), and Deferred Value Awards ("DVA")

5.5.3. Other elements of variable pay

5.5.3.1. Guaranteed variable remuneration

State Street does not generally award guaranteed variable remuneration. Where a strong business case can be made to justify such an award, this rationale will be reviewed along with the individual facts and circumstances of the award. Any such awards are only made in the following circumstances:

- It is rare and infrequent;
- It occurs in the context of hiring a new employee;
- The firm has a sound and strong capital base; and
- It is limited to the first year of service

5.5.3.2. Replacement of awards from previous employers

State Street may, from time to time, provide awards to new hires to compensate them for the loss of IC awards as a result of their termination of employment with their previous employer. When such awards are made, State Street will, as far as possible, match the structure (including vesting schedule and use of performance criteria) of the awards of the previous employer and will seek appropriate evidence of existing awards prior to the award of a buy-out. The quantum of awards will be an amount reasonably expected to fairly compensate the new hire for the loss of IC from their previous employer and attract them to join State Street, but not exceed the quantum of existing awards.

Buyouts are subject to the relevant variable pay regulations and appropriate evidence is sought of existing awards being lapsed prior to the award of a buyout.

5.5.3.3. Retention awards

Additional variable remuneration may be awarded to retain employees and forms part of the variable remuneration. Retention awards must meet the following criteria:

- Awards may only be made if there is a strong business case, on an infrequent basis, and their payment is aligned with the applicable organisational and risk strategies; and
- Awards are based on time factors such as where an employee stays in the business for a predetermined period of time or until a certain event

5.5.3.4. Recognition awards

Certain employees with exemplary risk management performance are eligible for additional “top-up” awards in recognition of their contributions to our culture of Risk Excellence. These recognition awards form part of the variable remuneration. IFPR Identified Staff are not eligible to participate in recognition award programs.

5.5.3.5. Severance

Severance payments are considered variable pay in certain circumstances. State Street has developed a UK-specific severance framework document that provides guidelines for the consideration of these types of payments in relation to the termination of an employment relationship and how payments should be structured and documented to comply with regulatory requirements.

5.5.4. Risk Adjustment

State Street applies both "ex-ante" and "ex-post" adjustments to its award process for IFPR Identified Staff.

5.5.4.1. "Ex-Ante" Risk Adjustment

Ex-ante adjustments are guided by the corporate multi-factor risk scorecard, developed by ERM, which is used to measure firm-wide risk performance. The scorecard is overseen by the global Management Risk and Capital Committee and the RC and is used by the HRC as an input into State Street's corporate IC pool size process. The scorecard provides a composite view of State Street's risks using a multi-factor framework that equally considers financial and non-financial risks and reflects ERM's views of State Street's current risk positioning, capabilities, and remediation status for each risk. The scorecard framework utilises several different risk inputs and perspectives to assess State Street Group's top risks and includes the following: Financial risks, including market, credit, liquidity and capital adequacy, and non-financial risks, including operational execution, technology and operational resiliency and business conduct/ compliance

The ex-ante adjustments would allow adjustments for the pool at SSC level (based on the determination of the remuneration body that is responsible for the oversight of the remuneration of such IFPR Identified Staff) and can also reduce variable pay at the individual level. Performance against the scorecard metrics is completed using data sourced from various systems in State Street Group's Control Functions, including ERM, Finance and Treasury, among others. Poor risk performance, including significant or repeated compliance or risk-related violations of State Street's policies, may result in ex-ante adjustments to an individual's IC as part of a progressive discipline structure to hold individual employees accountable for risk performance.

Before granting variable remuneration to IFPR Identified Staff, any negative deviations from agreed performance targets and misconduct by IFPR Identified Staff are considered in determining the grant amount (i.e., ex-ante risk adjustment). In case of negative deviations from agreed performance targets and/or misconduct, the grant amount can be reduced (and can be reduced to zero). Audit, Compliance, Legal and ERM reviews form part of possible performance adjustments for IFPR Identified Staff (internally termed the IFPR Identified Staff Red Flag Review). Aligned with the timing of Snapshots and the Year-End Summary, relevant Control Function Heads and the relevant Head of Legal jointly discuss conduct and non-conduct risk and compliance issues by IFPR Identified Staff employees. Based on the review the relevant feedback is provided to individual managers and they are asked to reflect any compliance and risk considerations in the Snapshots and/or Year-End Performance Category.

5.5.4.2. "Ex-Post" Risk Adjustment

State Street includes malus-based forfeiture and clawback provisions in the Deferred Award agreements of all Identified Staff. The malus-based forfeiture provision includes a statement of intention to comply with and meet the requirements of applicable banking regulations and guidance on IC, including both that of the Board of Governors of the United States Federal Reserve System and the PRA/FCA in the UK. It provides specifically that the HRC may reduce or cancel any Deferred Award to the extent required to do so under any such applicable rules. In this way, the forfeiture provision permits consideration by the corporate Malus Committee of any criteria, to the extent required by applicable law to be considered in an investigation and forfeiture decision. The UK RemCo oversees the outcome of any malus or clawback investigation for IFPR Identified Staff.

Malus-based forfeiture review will be triggered by the occurrence of a material loss, the establishment of a reserve for a material loss, or the investigation of facts or circumstances, which, if determined adversely to State Street or a material Business Unit of State Street, could reasonably be expected to result in a material loss or reserve.

In addition, State Street has for several years included in its Deferred Award agreements for all employees, a contractual provision requiring any unvested Deferred Awards to be forfeited in the case of termination on account of gross misconduct. Gross misconduct is determined in State Street's discretion and includes conduct that gives rise to a significant risk management failure in respect of State Street or a material Business Unit. This could include placing State Street at legal or financial risk.

State Street also includes a clawback provision in its IC awards to IFPR Identified Staff at least for the deferral period. One hundred percent of Deferred Awards are subject to malus performance adjustments and one hundred percent of all variable pay is subject to clawback.

5.6. Anti-circumvention and Avoiding Conflicts of Interest

All State Street staff are required to certify to the Standard of Conduct which prohibits them from short selling, hedging, purchasing or selling futures and options in State Street stock. In addition, IFPR Identified Staff are explicitly prohibited from using personal hedging strategies or liability-related contracts of insurance to undermine the risk alignment effects embedded in their remuneration arrangements. State Street's Personal Account Dealing team oversees and administers personal investment policies in several areas of State Street's business conducting particular regulated business activities or where employees have access to pre-trade information.

The policies contain different requirements, tailored to the specific risk within each business area. For example, all purchases and sales of State Street stock outside of the IC schemes require prior clearance for certain employees. For these employees, broker statements are submitted which are reconciled to the employee records to ensure all trades have been submitted. There are also blackout periods for relevant staff which are implemented and monitored to ensure that no relevant employees trade State Street stock during such periods. Any violations are escalated to the HRC for consideration and action to be taken.

To avoid conflicts of interest for State Street's Control Functions, each Control Function has a reporting line that is independent from the Business Units they support. The global management for each respective Control Function is responsible for determining compensation to Control Function staff, within overall State Street guidelines. Funding and performance assessment for these employees is based on overall corporate results and not by reference to the Business Units that individual Control Function employees support. The IC payable to senior risk and compliance officers in the UK is considered and approved by the UK RemCo.

State Street has implemented a process pursuant to which a committee of the Board with oversight of an area managed by a selected Control Function specifically reviews the performance assessment and IC recommendations for the heads of the relevant Control Function, as well as an overview of the performance and compensation for the entire Control Function. Annually, the RC conducts these reviews with respect to the Chief Risk Officer and ERM Department. This process is designed, amongst other things, to provide the relevant committee with additional perspective on the performance of the relevant Control Function and whether that function is being allocated appropriate resources and compensation.

5.7. Quantitative Information[5]

	Senior Management	Other IFPR Identified Staff	Other Staff
Total Remuneration (£ k)	1,116	20,594	42,566

5 Provided on the basis of IFPR Identified Staff (including Non-Executive Directors identified as IFPR Identified Staff) for SSGAL

Total Fixed Remuneration (£ k)	572	8,856	27,232
Total Variable Remuneration (£ k)	544	11,738	15,334
Number of Staff	5	26	249

	Senior Management	Other IFPR Identified Staff
Guaranteed Variable Remuneration (£ k)	0	0
Number of IFPR Identified Staff	0	0
Severance payments (£ k)	0	0
Number of IFPR Identified Staff	0	0
Highest Severance Payment to IFPR Identified Staff	0	0

6. Investment Policy

Further to MIFIDPRU 8.7.6, SSGAL does not publish its Investment Policy as it maintains appropriate controls to monitor the voting rights of SSGAL's holdings to stay below the specified 5% threshold.

Issued by:
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