

MODERN SLAVERY ACT STATEMENT – 2021

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (UK) for the financial year ended 31 December 2021 in respect of the following State Street entities:

- State Street Global Advisors Limited;
- State Street Bank and Trust Company; and
- State Street Bank International GmbH (together, “**State Street**” or “**we**”)

State Street provides custody, depositary, investment, research, fund accounting, fund administration, asset management, and alternative investment services.

State Street is committed to fair, ethical and responsible business practices. We recognize that the risk of slavery or human trafficking exists in any supply chain and are taking steps to reduce that risk.

State Street supports fundamental principles of human rights, such as those adopted in the United Nations’ Universal Declaration of Human Rights. We believe that upholding these principles is an important component of our culture and values. As a signatory to the United Nations Global Compact (UNGC), we have confirmed our support of the UNGC’s ten principles and our intent to advance those principles within our organization, which include those principles relating to human rights abuses and forced labor.

Our commitment to fair, ethical and responsible business practices is central to our way ahead, as outlined in our annual ESG report.¹

Supply chain standards

Our Global Procurement Services team is responsible for executing appropriate due diligence and contract management procedures, such as an established request for proposal (RFP) selection criterion, standard supplier Master Services Agreement (MSA) templates and Engagement Compliance control mechanisms. We expect our suppliers and their supply chain to comply fully with all applicable laws and regulations in the conduct of their business; therefore, although respecting human rights and environmental issues in the supply chain is ultimately our suppliers’ responsibility, we take steps to communicate clearly our expectations to our suppliers.

In 2021, we developed and mandated a new online Modern Slavery Training course to educate our Global Procurement Services team on State Street’s Modern Slavery policy and the specific responsibilities of the

¹ State Street 2021 ESG Report, available at <https://www.statestreet.com/content/dam/statestreet/documents/values/state-street-esg-report-04-2021.pdf>

Global Procurement Services organization to mitigate Modern Slavery risks. This training was required for all employees in Global Procurement Services as of July 2021 and is an annual requirement going forward.

Requests for Proposal

State Street uses a variety of approaches to assess and evaluate existing and new suppliers and the selection process may include a Request for Proposal (“RFP”) where we determine competitive bidding is warranted. Since at least 2016, as part of the supplier RFP process managed by our Global Procurement Services team, potential suppliers have been asked to confirm whether they have a policy in place prohibiting child and/or forced labor, whether the policy extends to their own suppliers and subcontractors, and to provide a copy of the policy. Those potential suppliers are also asked for information about social compliance audits of their own suppliers and subcontractors, with particular reference to significant risks for incidents of child labor. That due diligence process also seeks information about a potential supplier’s equal opportunity, human rights, anti-corruption, and health and safety policies.

As part of the RFP process, our Global Procurement Services team also specifically asks potential suppliers to confirm their compliance with human rights laws, rules and regulations including the Modern Slavery Act 2015. Those potential suppliers are also asked to provide information about how they monitor and comply with those legal standards.

Supplier contracts

We actively and intentionally include clauses specific to Prohibition on Human Trafficking and Modern Slavery in supplier contracts. Since 2016, suppliers who are subject to our standard form of supplier agreement (“MSA”) have been asked to represent and warrant that they comply with all applicable laws, regulations, and other legal obligations to their personnel specifically including, but not limited to, employment laws, and prohibitions against insider trading, bribery, and corruption.

Additionally, since 2016 suppliers who have been engaged using our standard MSA have been asked to confirm that they:

- Have not committed or been notified that they have been placed under investigation for any offences relating to human trafficking and/or slavery;
- Are not aware of any circumstances within their supply chain that could give rise to an investigation or a prosecution; and
- Will comply with the Modern Slavery Act 2015 and other legal standards relating to human trafficking and/or slavery.

Those suppliers have also been asked to notify us immediately if those circumstances change. Additionally, the standard MSA asks them to provide us with their own UK Modern Slavery Act statement, where applicable, which sets out the steps they have taken to ensure that slavery and/or human trafficking is not taking place in any of their supply chains or in any part of their business.

From time to time, potential suppliers are not able to provide the information requested in full or seek to negotiate amendments to the standard MSA. Such requests are dealt with on a case-by-case basis, taking into consideration the risks associated with the supplier's industry and its geographic location.

Strategic suppliers

In 2020, we augmented our governance processes over strategic suppliers (as determined by Procurement, considering factors such as risk and spend) to not only provide a copy of their own Modern Slavery Act statement, but to additionally provide an explanation in the event that such a statement was not made available. We continued this approach in 2021.

Third Party Risk Management

In 2017 and 2018, as part of our commitment to fair, ethical and responsible business practices, we started to build modern slavery considerations into our Third Party Risk Management ("TPRM") program. TPRM is a process and framework designed to enable us to consistently assess and manage the risks associated with our supply chain prior to, and throughout the lifecycle of, a third party vendor engagement.

Our due diligence questionnaires are aligned to industry standard and best practice. Among other things, since 2020 we have been requesting information about suppliers' ethics policies and whether they consider human rights, modern slavery, and human trafficking. Through our Compliance and Operational Risk Assessments we evaluate whether those suppliers have processes ensuring compliance with laws and regulations within their own organizations and by any sub-contractors that they intend to use to provide services to State Street. Where we identify any control deficiencies, we require our suppliers to implement a remediation plan along with a strategy and timeframe for attaining compliance with the plan.

Additionally, prior to any supplier being engaged, we complete an Inherent Risk Questionnaire ("IRQ"). Since 2016, within the IRQ we have asked which countries the supplier will provide their product or service from, and the countries selected are risk rated based on scores provided by the Enterprise Risk Management (ERM) Sovereign Risk team. These risk ratings include ESG risk, which considers civil liberties, including vulnerability to human trafficking risk and government mitigation measures, as a factor. Engagements in high risk countries must be reviewed and approved by the Sovereign Risk team as part of the due diligence process.

Human Resources

Since March 2016 we have had in place a Human Trafficking & Modern Slavery Policy which sets out State Street's policy and expectations for all our staff and business units globally. The policy, which was last reviewed in Q1 of 2022, prohibits human trafficking and related activities within our business, including inappropriate recruitment practices, and mandates the use of applicable RFP and supplier MSA templates and compliance with applicable TPRM processes.

To facilitate discussions between managers and their teams, since 2017 we have had a “Team Talk” pack explaining how the Modern Slavery Act applies to the corporate sector.

Finally, since 2018 as part of our online training catalogue we have had a course on the UK Modern Slavery Act, which is available to all staff.

Approved for and on behalf of:	Signed off by:
<p>State Street Bank and Trust Company, acting through its UK branch</p> <p>By its UK Country Committee</p> <p>Date of approval: 30 May 2022</p>	<p>Name: Cuan Coulter</p> <p>Title: Head of UK Branch</p> <p>Date of sign off: 30 May 2022</p> <p>Signature: _____</p>
<p>State Street Bank International GmbH</p> <p>By its Executive Management Board</p> <p>Date of approval: 29 June 2022</p>	<p>Name: Stefan Gmuer</p> <p>Title: Chief Executive Officer</p> <p>Date of sign off: 30 June 2022</p> <p>Signature: _____</p>
<p>State Street Global Advisors Limited</p> <p>By its Board of Directors</p> <p>Date of approval: 14 June 2022</p>	<p>Name: Alex Castle</p> <p>Title: Chief Executive Officer</p> <p>Date of sign off: 16 June 2022</p> <p>Signature: _____</p>