# Modern Slavery Statement

Financial Year Ended 30 June 2023 (Issued December 2023)

Joint Statement for the:

State Street Australian Equities Index Trust;

State Street International Equities Index Trust;

SPDR® S&P®/ASX 200 Fund; and

SPDR® S&P®/ASX 50 Fund

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# 1. Introduction

This joint statement is made pursuant to the requirements of the section 16 of the *Modern Slavery Act 2018 (Cth)* (the Act) in respect of the:

State Street Australian Equities Index Trust (APIR SST0004AU, ARSN 089 590 312);

State Street International Equities Index Trust (APIR SST0013AU, ARSN 089 590 232);

SPDR® S&P®/ASX 200 Fund (ASX code: STW, ARSN 097 712 377);

SPDR® S&P®/ASX 50 Fund (ASX code: SFY, ARSN 097 712 420)

(together "the Funds"), which meet the minimum revenue requirements of the Act for the financial year ended 30 June 2023.

State Street is committed to fair, ethical and responsible business practices. We recognise 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 organisation, which include those principles relating to human rights abuses and forced labour.

Our commitment to fair, ethical and responsible business practices is central to our way ahead, as outlined in our annual environmental, social, and governance (ESG) report<sup>1</sup>

<sup>1</sup> State Street 2022 ESG Report

# 2. Structure, Operations and Supply Chains

## **Structure**

The State Street Australian Equities Index Trust is a registered managed investment scheme structured as a unit trust and is a reporting entity for the purposes of this joint Statement. The Fund's total assets as of 30/6/23 were AUD 768,217,238, net assets (i.e. after liabilities) were AUD 744,557,990.

The State Street International Equities Index Trust is a registered managed investment scheme structured as a unit trust and is a reporting entity for the purposes of this joint Statement. The Fund's total assets as of 30/6/23 were AUD 1,384,810,808, net assets (i.e. after liabilities) were AUD 1,326,258,800.

The SPDR® S&P®/ASX 200 Fund is a registered managed investment scheme which is an exchange traded fund (ETF) listed and traded on the ASX, and is a reporting entity for the purposes of this joint Statement. The Fund's total assets as of 30/6/23 were AUD 4,776,191,959, net assets (i.e. after liabilities) were AUD 4,725,180,159.

The SPDR® S&P®/ASX 50 Fund is a registered managed investment scheme which is an exchange traded fund (ETF) listed and traded on the ASX, and is a reporting entity for the purposes of this joint Statement. The Fund's total assets as of 30/6/23 were AUD 826,538,097, net assets (i.e. after liabilities) were AUD 820,406,195.

State Street Global Advisors, Australia Services Limited (AFSL 274900, ABN 16 108 671 441) ("Responsible Entity" or "SSGA, ASL"), registered office: Level 14, 420 George Street, Sydney, NSW 2000, Australia, is the responsible entity of the Funds and is responsible to unitholders for the operation of the Funds under the Corporations Act and the Funds' constitutions. As the responsible entity, SSGA, ASL is wholly responsible for the operation of the Funds and any agents that it appoints in its role as Responsible Entity, including the Investment Manager.

State Street Global Advisors, Australia, Limited (AFSL 238276, ABN 42 003 914 225) ("SSGA, AL"), registered office: Level 14, 420 George Street, Sydney, NSW 2000, Australia, is the Investment Manager of the Funds and manages the assets of the Funds in accordance with the Funds' investment objectives and strategies and acts as distributor of the units in the Funds.

SSGA, AL is the parent entity of SSGA, ASL and provides all resources (human, financial, technical, etc.) to SSGA, ASL SSGA, ASL has no employees of its own.

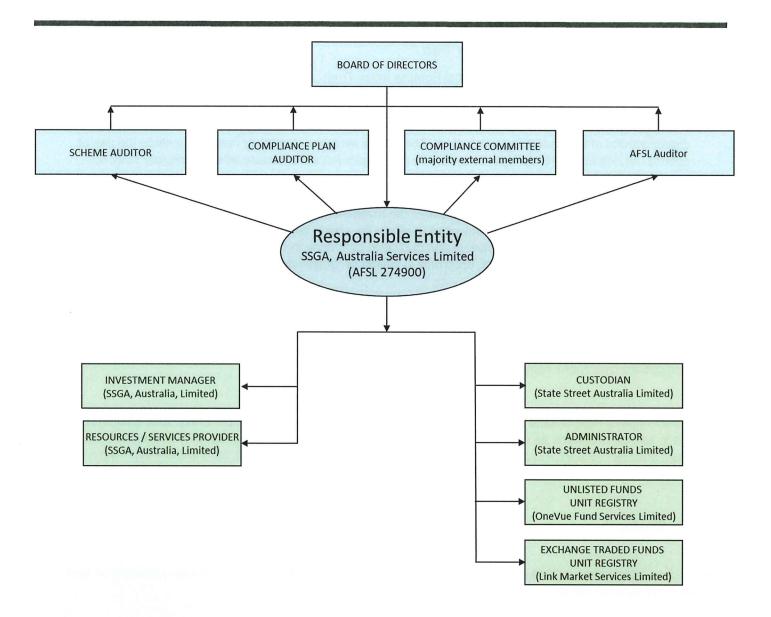
SSGA, AL is part of State Street Global Advisors ("SSGA"), the asset management arm of State Street Corporation ("State Street"), a New York Stock Exchange listed company. SSGA is a global leader in investment management with funds under management valued at AUD \$5.7 trillion as of 30 September 2023<sup>2</sup>, which includes discretionary portfolios, ETFs and other collective investment schemes.

State Street Australia Ltd (ABN 21 002 965 200, AFSL 241419) ("SSAL"), the asset servicing arm of State Street, has been appointed as the Funds' custodian and administrator.

OneVue Fund Services Pty Limited has been appointed as the external Unit Registry for the unlisted managed investment schemes.

Link Market Services Limited has been appointed as the external Registrar for the ASX quoted exchange traded funds.

<sup>&</sup>lt;sup>2</sup> This figure is presented as of September 30, 2023 and includes approximately \$58.13 billion USD of assets with respect to SPDR products for which State Street Global Advisors Funds Distributors, LLC (SSGA FD) acts solely as the marketing agent. SSGA FD and State Street Global Advisors are affiliated.



# **Operations**

Each Fund is a managed portfolio of assets investing in Australian or International equities. Each unitholder's money is pooled together with other people's money, and the Investment Manager invests that money and manages the assets of each Fund on behalf of its scheme members in accordance with the Fund's investment approach.

Our strategy is to buy and hold securities, trading only when there is a change to the Fund's index, investor cash flows, or to reinvest cash from dividend income, tax reclaims or corporate actions. This approach minimises tracking error and transaction costs due to its low turnover.

# State Street Australian Equities Index Trust

In managing the State Street Australian Equities Index Trust, the Investment Manager's primary investment strategy is to select a portfolio of securities that best tracks the S&P/ASX 200 Accumulation Index. The goal of the indexed strategy is to mirror the returns and characteristics of the underlying benchmark. The Fund's investment strategy may also include the use of options, futures and other derivatives to reduce risk or gain market exposure when necessary to do so.

# State Street International Equities Index Trust

In managing the State Street International Equities Index Trust, the Investment Manager's primary investment strategy is to select a portfolio of securities that best tracks the MSCI World ex Australia index while excluding companies with material business activities in tobacco and controversial weapons from the State Street International Equities Index Trust's portfolio. The goal of the indexed strategy is to mirror the returns and characteristics of the underlying benchmark. The Fund's investment strategy may also include the use of options, futures and other derivatives to reduce risk or gain market exposure when necessary to do so.

### SPDR® S&P®/ASX 200 Fund

In managing the SPDR® S&P®/ASX 200 Fund, the Investment Manager uses a passive investment strategy, investing in a portfolio of securities designed to reflect the characteristics the S&P/ASX 200 Index. Those securities can include index constituents and derivative contracts, including exchange traded futures contracts and options over index constituents, used only in limited circumstances.

## SPDR® S&P®/ASX 50 Fund

In managing the SPDR® S&P®/ASX 50 Fund, the Investment Manager uses a passive investment strategy, investing in a portfolio of securities designed to reflect the characteristics the S&P/ASX 50 Index. Those securities can include Index constituents and Derivative contracts, including exchange traded futures contracts and options over Index constituents, used only in limited circumstances.

Neither the Funds or Responsible Entity have any employees however the Responsible Entity does outsource some functions to service providers, as outlined below, and charges the Funds an ongoing fee for Management Costs. The Investment Manager (SSGA, AL) provides all resources (human, financial, technical, etc.) to the Responsible Entity (SSGA, ASL).

# **Supply Chains**

The Fund's supply chains include the services provided by the Responsible Entity's outsourced service providers, such as those outlined below.

## Investment Management

SSGA, AL is the Investment Manager of the Funds, based in Australia, and provides all resources (human, financial, technical, etc.) to the Responsible Entity (SSGA, ASL).

SSGA, AL operates via a unified global investment platform. Through this platform we seek to leverage the expertise that resides within our global affiliates, and to do so in a manner designed to deliver successful investment outcomes and meet the evolving needs of our clients. Our principal offices from which we provide investment services include Boston, London, Dublin, Stamford, San Francisco, Sydney, Tokyo, Singapore and Hong Kong.

We also utilise affiliates located around the world, including India, Ireland, China, Poland and the United Kingdom, to perform a wide range of functions associated with the ongoing management, servicing and oversight of our commingled funds and separately managed accounts. Services performed include trade processing functions, billing and portfolio administration functions (including daily position and cash account reconciliation, performance reporting, cash flow processing, trade administration functions and corporate actions), finance and accounting functions, and certain client reporting, fund oversight and shareholder services functions.

SSGA, AL utilises State Street's Investment Management Services ("IMS") team for middle office functions, including trade and derivative processing and operations, portfolio management support and performance attribution.

While components of our services may be performed by affiliated entities, SSGA remains fully responsible for the delivery of services to its clients and all State Street entities are subject to the same Global Human Trafficking Modern Slavery Policy ("Policy") and supply chain standards. The Policy reflects State Street's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to

reduce the risk of slavery, servitude, forced or compulsory labour, or human trafficking ("Modern Slavery") taking place anywhere in its supply chains.

SSGA, AL's supply chains also include a combination of global and regional suppliers to support business needs related to Information Technology Services (including hardware/software, Telecommunications and Audio Visual), Good and Services (including office supplies, print services, food services/catering and subscription services), and Professional Consulting Services (including legal, financial, audit and IT consulting).

### Fund Administration and Custodial Services

SSAL is the custodian and administrator of the Funds, based in Australia.

# **Unit Registry**

OneVue Fund Services Pty Limited is the Unit Registry for the unlisted managed investment schemes, based in Australia.

Link Market Services Limited has been appointed as the external Registrar for the ASX quoted exchange traded funds.

### Audit and Tax Services

Ernst & Young provides audit and tax services to the Funds and to SSGA, AL and SSGA, ASL

# 3. Our Modern Slavery Risks and Actions Taken

# **Operations**

In managing the Funds, the Investment Manager's primary investment strategy is to select a portfolio of securities that best tracks its underlying index.

The Sustainable Accounting Standards Board has identified 12 industries where "Labor Practices" are a sustainability issue that is likely to affect the financial condition or operating performance of a company. Using the Sustainable Industry Classification System® (SICS®), we have identified the following holdings in the Funds within these higher-risk industries as at 31 October 2023:

## State Street Australian Equities Index Trust:

Industry	Holdings	Weight (%)
Multiline and Specialty Retailers & Distributors	6	3.21%
Coal Operations	2	0.40%
Metals & Mining	32	19.88%
Food Retailers & Distributors	5	4.05%
Restaurants	2	0.20%
Waste Management	2	0.39%
Hotels & Lodging	0	0.00%
Electronic Manufacturing Services & Original Design Manufacturing	0	0.00%
Air Freight & Logistics	1	0.24%
Airlines	1	0.53%
Automobiles	0	0.00%

Cruise Lines	1	0.06%	
	52	28.95%	

Source: SSGA, as of 31 October 2023. Holdings are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

# State Street International Equities Index Trust:

Industry	Holdings	Weight (%)
Multiline and Specialty Retailers & Distributors	39	3.22%
Coal Operations	0	0.00%
Metals & Mining	21	1.03%
Food Retailers & Distributors	16	0.59%
Restaurants	10	1.02%
Waste Management	4	0.27%
Hotels & Lodging	5	0.22%
Electronic Manufacturing Services & Original Design Manufacturing	1	0.01%
Air Freight & Logistics	9	0.56%
Airlines	6	0.08%
Automobiles	22	2.53%
Cruise Lines	2	0.08%
	135	9.61%

Source: SSGA, as of 31 October 2023. Holdings are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

# SPDR® S&P®/ASX 200 Fund:

Industry	Holdings	Weight (%)
Multiline and Specialty Retailers & Distributors	6	3.21%
Coal Operations	2	0.41%
Metals & Mining	32	19.84%
Food Retailers & Distributors	5	4.05%
Restaurants	2	0.19%
Waste Management	2	0.39%
Hotels & Lodging	0	0.00%
Electronic Manufacturing Services & Original Design Manufacturing	0	0.00%
Air Freight & Logistics	1	0.23%

Information Classification: General

Automobiles 0 0.00%	
Airlines 1 0.55%	

Source: SSGA, as of 31 October 2023. Holdings are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

# SPDR® S&P®/ASX 50 Fund:

Industry	Holdings	Weight (%)
Multiline and Specialty Retailers & Distributors	1	3.30%
Coal Operations	0	0.00%
Metals & Mining	7	20.62%
Food Retailers & Distributors	3	4.80%
Restaurants	0	0.00%
Waste Management	0	0.00%
Hotels & Lodging	0	0.00%
Electronic Manufacturing Services & Original Design Manufacturing	0	0.00%
Air Freight & Logistics	0	0.00%
Airlines	1	0.69%
Automobiles	0	0.00%
Cruise Lines	0	0.00%
	12	29.41%

Source: SSGA, as of 31 October 2023. Holdings are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

Other than where stated in a Funds product disclosure statement, the Manager's investment decisions in respect of the Funds are primarily based on economic factors and they do not specifically take into account labour standards or environmental, social or ethical considerations in the selection, retention or realisation of investments.

## Asset Stewardship

As part of one of the largest asset managers in the world, we seek to manage risks and opportunities on behalf of our clients, including those associated with socially responsible and sustainable business practices. We seek to manage those risks and opportunities through engagement with investee companies and proxy voting, consistent with our Proxy Voting and Engagement Policy. The Investment Manager actively engages with portfolio companies on issues that promote long-term value creation. With certain exceptions, such as the Investment Manager's Investor Voting Choice program, voting decisions are not specific to any particular Fund.

We recognise that the regulatory risk associated with modern slavery could be material to companies within relevant markets, and that certain industries are at higher risk for incidents of forced labour. To more effectively manage risks to our portfolio related to modern slavery, we also launched a proactive engagement campaign on this topic in 2021. We leveraged relevant sustainability frameworks including the Sustainability Accounting Standards Board (SASB), the

Global Slavery Index, and standards and conventions of the International Labour Organisation (ILO) to identify companies within our largest holdings for engagement. Through targeted engagements, we strengthened our understanding of best practices and challenges facing companies that operate in high-risk sectors and geographies. These insights will inform our ongoing stewardship efforts in this space. In March 2023 we also updated our *Guidance on Human Rights Disclosures & Practices* to communicate our expectations on human rights-related disclosures.

We continue to regularly engage with companies on this topic and encourage them to provide disclosures in alignment with our guidance. As is our standard practice, we will first approach this issue through engagement. If we identify laggards that are not adequately managing risks related to modern slavery, we may consider taking voting action against directors and supporting relevant shareholder proposals in accordance with our Proxy Voting and Engagement Policy.

# **Supply Chains**

# 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.

# 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 labour, 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 labour. 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. Those potential suppliers are also asked to provide information about how they monitor and comply with those legal standards.

### Supplier contracts

We 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 MSA are 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 are 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 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 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.

# Third Party Risk Management

Third-Party Risk Management (TPRM) is a process and framework designed to enable State Street to consistently assess and manage the risks associated with our third parties prior to, and throughout, the lifecycle of a third-party service provider engagement. Prior to engaging with any service provider, the contracting business unit completes an Inherent Risk Questionnaire (IRQ). Based upon the results of the IRQ, TPRM performs due diligence via due diligence questionnaires (DDQ) on our third parties. The Compliance DDQ process, which is completed for a subset of third-party engagements, includes the review of information about service providers' ethics policies and whether they account for human rights, modern slavery, and human trafficking. Where we identify any control deficiencies, we require our service providers to implement a remediation plan along with a strategy and timeframe for attaining compliance with the plan.

Additionally, the IRQ contains the countries that the service provider 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 factor in ESG risk (which considers civil liberties), vulnerability to human trafficking risk, and government mitigation measures. Engagements in high-risk countries must be reviewed and approved by the Sovereign Risk team as part of the due diligence process.

In 2023, State Street will undertake an effort to review and enhance, where required, the modern slavery due diligence performed, focusing on the population of third parties that introduce the highest levels of modern slavery risk.

### **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.

State Street maintains a whistle-blower hotline, known as the Speak Up Line. The Speak Up line is a confidential third-party resource where State Street employees, contingent workers, clients and vendors can raise concerns about potential or actual misconduct or policy violations. Individuals may raise concerns anonymously and without fear of retaliation, using either the internet or the telephone.

# Compliance Training

Each State Street employee undergoes compliance training to learn appropriate conduct for engaging with clients, prospects, business partners, high-risk individuals, peers and other stakeholders. This training covers our Ethical Decision-Making Framework, Standard of Conduct and Anti-Bribery Policy, Corruption Policy, as well as industry-specific conduct requirements related to issues such as conflicts of interest.

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 Global Procurement Services organisation to mitigate Modern Slavery risks. Starting from July 2021, the training became a compulsory annual requirement for all staff members in Global Procurement Services, and in 2022, we expanded its coverage to encompass the Accounts Payable team.

## Speak up line

There are a number of options for individuals to escalate concerns, including through our Speak Up Line. The Speak up line is a confidential third-party resource where State Street employees, contingent workers, clients and vendors can

raise any concerns about potential or actual misconduct or policy violations. The Speak Up Line is operated by an independent third party and is available 24 hours a day, 365 days a year. The Speak Up Line can also be used to report concerns anonymously. Reports are provided to the Lead Director of the Board, the Chief Legal Officer, and the General Auditor and may be forwarded to relevant personnel, such as senior business line compliance officers, Global Human Resources, the Ethics Office, or Global Security, for further action as appropriate. We do not tolerate retaliatory action against anyone for good faith reporting as articulated in our Standard of Conduct and Non-Retaliation policies.

# 4. How we assess the effectiveness of our actions

State Street operates a three lines of defence model, with the business unit as the first line, Corporate Compliance and Enterprise Risk Management as the second, and Corporate Audit as the third. The model is a common structure for risk and control assessments and provides for ongoing monitoring, testing, and oversight of our control environment. The first line of defence owns the risks associated with their activities and is responsible for establishing effective internal controls to manage such risks to an acceptable level and promoting a strong culture of risk management and risk awareness.

Modern Slavery risks have been incorporated into State Street's enterprise risk taxonomy. Periodic controls testing performed by three lines of defense is to assess the operating effectiveness of controls in place to mitigate risks. Any weaknesses or enhancements in anti-Modern Slavery controls is escalated in a timely and effective manner under incident reporting and issue management framework.

# 5. Process of consultation with any entities we own or control

The Funds do not own or control any other entities and therefore this criterion is not applicable.

However State Street has adopted a Global Human Trafficking Modern Slavery Policy ("Policy") that applies to all State Street entities, including State Street Global Advisors and any other entities State Street owns. All entities are subject to the same supply chain standards globally. The Policy reflects State Street's commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls to reduce the risk of slavery, servitude, forced or compulsory labor, or human trafficking (Modern Slavery") taking place anywhere in its supply chains.

# 6. Statement approval

This statement was presented for consultation and has been approved by the Boards of State Street Global Advisors, Australia, Limited and State Street Global Advisors, Australia Services Limited, as the Investment Manager and Responsible Entity of the reporting entities covered by this statement (the Funds), on 18 December 2023.

This statement is signed by Jonathan Shead in his role as Director of State Street Global Advisors, Australia, Limited and State Street Global Advisors, Australia Services Limited.

Jonathan Shead

Director

Information Classification: General

Issued by State Street Global Advisors, Australia Services Limited (AFSL Number 274900, ABN 16 108 671 441) ("SSGA, ASL"). Registered office: Level 14, 420 George Street, Sydney, NSW 2000, Australia · Telephone: +612 9240-7600 · Web: www.ssga.com. State Street Global Advisors, Australia, Limited (AFSL Number 238276, ABN 42 003 914 225) ("SSGA Australia") is the Investment Manager.

References to the State Street Australian Equities Index Trust, State Street International Equities Index Trust, SPDR® S&P®/ASX 200 Fund, and SPDR® S&P®/ASX 50 Fund in this communication are references to the managed investment schemes domiciled in Australia, promoted by SSGA Australia, in respect of which SSGA, ASL is the Responsible Entity.

This general information has been prepared without taking into account your individual objectives, financial situation or needs and you should consider whether it is appropriate for you. You should seek professional advice and consider the product disclosure document, available at ssga.com/au, before deciding whether to acquire or continue to hold units in the Funds. The target market determination is also available at ssga.com/au.

Investing involves risk including the risk of loss of principal. Risk associated with equity investing includes stock values which may fluctuate in response to the activities of individual companies and general market and economic conditions.

This material should not be considered a solicitation to apply for interests in the Funds and investors should obtain independent financial and other professional advice before making investment decisions. There is no representation or warranty as to the currency or accuracy of, nor liability for, decisions based on such information.

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