
Modern Slavery Statement

Financial Year Ended 30 June 2024 (Issued November 2024)

Joint Statement for the:

State Street International Equities Index Trust;

SPDR® S&P®/ASX 200 Fund; and

SPDR® S&P®/ASX 200 Listed Property Fund

Contents

1. Introduction	3
2. Structure, Operations and Supply Chains	4
Structure	4
Operations	5
Supply Chains	6
3. Our Modern Slavery Risks and Actions Taken	7
Operations	7
Supply Chains	9
4. How we assess the effectiveness of our actions	11
5. Process of consultation with any entities we own or control	12
6. Statement approval	12

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 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 200 Listed Property Fund (ASX code: SLF, ARSN 099 389 821)

(together “the Funds”), which meet the minimum revenue requirements of the Act for the financial year ended 30 June 2024.

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 these risks.

As a leading global organisation with significant geographic reach, we need to ensure that our ethical standards are upheld in our procurement practices and that our suppliers are fully compliant with all human rights laws and regulations. We hold our suppliers to the highest standards when it comes to human rights and closely monitor our supply chain. Further detail on how we manage human rights in our supply chain can be found in our Human Rights Statement¹.

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.

While components of our services may be performed by affiliated entities, State Street remains fully responsible for the delivery of services to our clients and entities in the State Street Group are subject to the same Global State Street 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 of 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. The Policy sets out State Street’s guiding principles, goals and expectations for all its staff and business units globally. The policy prohibits human trafficking and related activities within the State Street Group’s business, including inappropriate recruitment practices, and mandates the use of applicable Request for Proposal (RFP) and master supplier agreement templates, and compliance with applicable Third-Party Risk Management (TPRM) processes.

Our commitment to fair, ethical and responsible business practices is central to our way ahead, as outlined in our annual sustainability report²

¹ [State Street Human Rights Statement](#)

² [State Street 2023 Sustainability Report](#)

2. Structure, Operations and Supply Chains

Structure

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 30/6/24 were AUD 783,154,765 net assets (i.e. after liabilities) were AUD 746,726,829.

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 30/6/24 were AUD 5,240,259,782 net assets (i.e. after liabilities) were AUD 5,201,629,165.

The SPDR® S&P®/ASX Listed Property 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 30/6/24 were AUD 505,718,251 net assets (i.e. after liabilities) were AUD 497,924,635.

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.

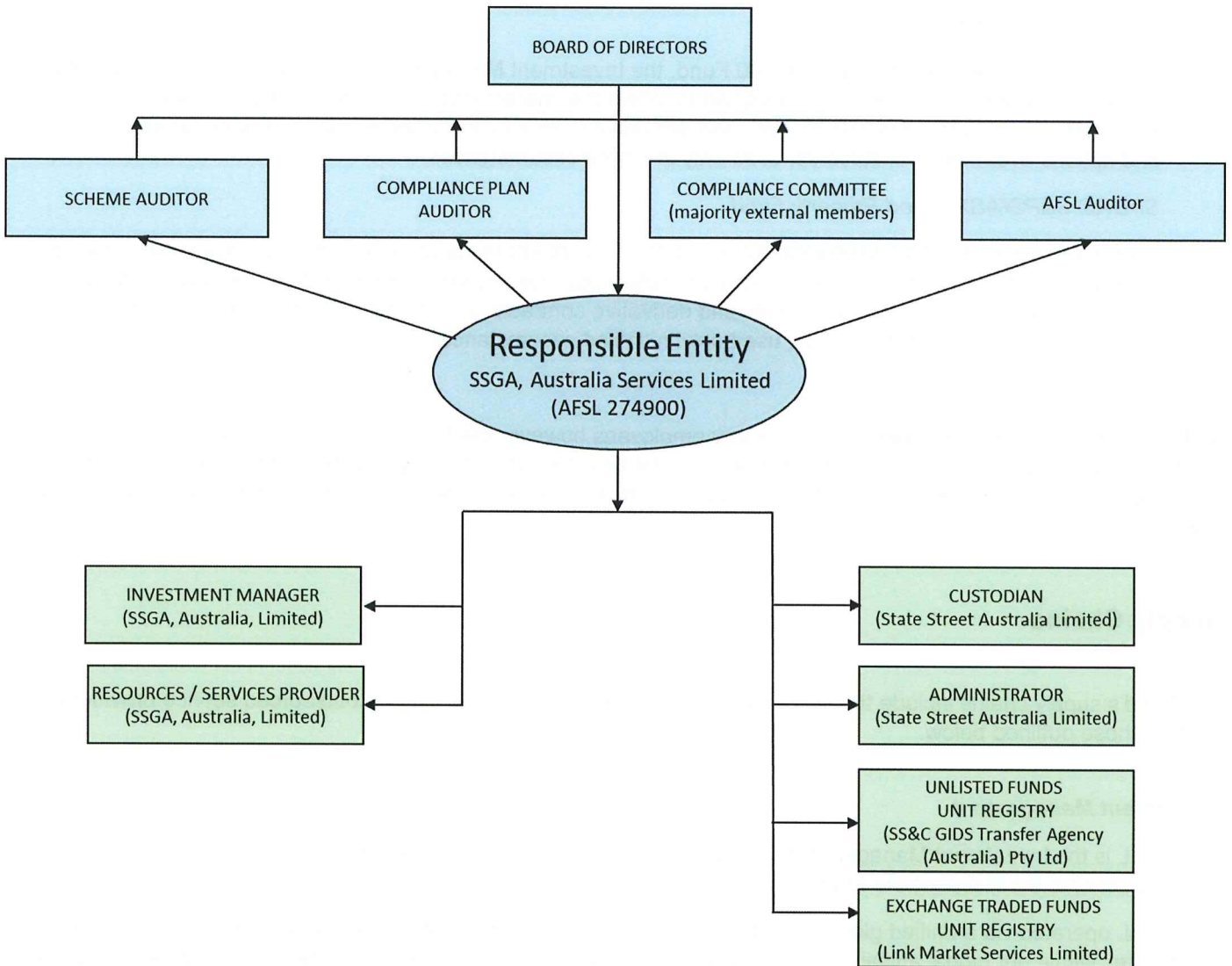
SSGA, AL is part of State Street Global Advisors ("SSGA"), the asset management arm of State Street Corporation ("State Street"), a New York Stock Exchange listed company. SSGA is a global leader in investment management with funds under management valued at AUD \$6.82 trillion as of 30 September 2024³, 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.

SS&C GIDS Transfer Agency (Australia) Pty Ltd 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.

³ This figure is presented as of September 30, 2024 and includes ETF AUM of \$2,184.08 billion AUD of which approximately \$119.01 billion AUD is in gold 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 each 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 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 Listed Property 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.

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

SS&C GIDS Transfer Agency (Australia) Pty Ltd 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 2024:

State Street International Equities Index Trust:

Industry	Holdings	Weight (%)
Multiline and Specialty Retailers & Distributors	40	3.33%
Coal Operations	0	0.00%
Metals & Mining	22	0.95%
Food Retailers & Distributors	16	0.50%
Restaurants	11	0.84%
Waste Management	5	0.39%
Hotels & Lodging	6	0.24%
Electronic Manufacturing Services & Original Design Manufacturing	1	0.01%
Air Freight & Logistics	10	0.42%
Airlines	7	0.05%
Automobiles	22	1.95%
Cruise Lines	2	0.11%
	142	8.81%

Source: SSGA, as of 31 October 2024. 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	4.03%
Coal Operations	4	0.43%
Metals & Mining	31	16.38%
Food Retailers & Distributors	5	3.07%
Restaurants	3	0.13%
Waste Management	2	0.34%
Hotels & Lodging	0	0.00%
Electronic Manufacturing Services & Original Design Manufacturing	1	0.03%
Air Freight & Logistics	1	0.27%
Airlines	1	0.58%
Automobiles	0	0.00%
Cruise Lines	1	0.03%
	55	25.30%

Source: SSGA, as of 31 October 2024. 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 Listed Property Fund

Industry	Holdings	Weight (%)
Multiline and Specialty Retailers & Distributors	0	0.00%
Coal Operations	0	0.00%
Metals & Mining	0	0.00%
Food Retailers & Distributors	0	0.00%
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	0	0.00%
Automobiles	0	0.00%
Cruise Lines	0	0.00%
	0	0.00%

Source: SSGA, as of 31 October 2024. 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 Global 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. We have also developed Human Rights Disclosure Criteria which can be found in our [Global Proxy Voting and Engagement Policy](#).

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 in accordance with our Global 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.

In 2021, we rolled out 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 organization to mitigate Modern Slavery risks. The training has been a mandatory annual requirement for Global Procurement Services staff since July 2021. In 2022 and 2023, we updated the training and expanded the coverage of this training to encompass the Accounts Payable team and the Payment Hub respectively.

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.

Information Classification: General

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 evaluated our third party population for vendors in high risk industries providing services in high risk countries. For this population, we launched a targeted assessment to understand their controls and determine potential for risks. This review will continue into 2024, and any potential issues will be addressed as discovered.

Supplier contracts

Suppliers who are subject to our standard supplier agreement 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, suppliers who are engaged using our standard supplier agreement 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 supplier agreement asks them to provide us with their own Modern Slavery Act statement, 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 supplier agreement. 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.

In 2023, we developed criteria to evaluate the sustainability performance of our strategic suppliers, which takes place during quarterly business review meetings. We rolled out this enhanced engagement in 2024 so as to enable a more standardized process for suppliers to self-assess and report on their sustainability standards, including those related to modern slavery.

Global Realty Services

In Australia, State Street's Global Realty Services manages all services related to the operation and occupation of its primary offices in Sydney and Melbourne. In the case of the Brisbane office, all services related to the operation and occupation of the office are outsourced to the serviced office provider. Essential maintenance services related to State Street's primary Australia offices are outsourced to a single Facilities Management provider under the terms of an MSA containing a specific clause requiring the provider, and any vendor that it uses, to adhere to the Modern Slavery Act and "any other laws, rules or regulations prohibiting human trafficking and/or slavery". Our Facilities Management provider maintains its own Modern Slavery Act statement covering its Australia business activities.

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 organization to mitigate Modern Slavery risks.

We updated the training and expanded coverage of this training to encompass our Accounts Payable team in 2022 and our Payment Hub team, in 2023.

In 2024, we aim to:

- Participate in the UN Global Compact's Business & Human Rights Accelerator Program
- Participate in the UN Global Compact's Business & Human Rights Peer Learning Group
- Expand the Modern Slavery Awareness Training to targeted internal groups

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. There are a variety of controls in place, with principal control owners sitting within the Global Human Resources (GHR), Procurement and Third Party Risk Management (TPRM) organisations. The controls are implemented through the expectations contained within the standards, policies and processes governing the respective groups, which are overseen by Corporate Compliance. We take compliance with our standards and procedures seriously and have prescribed processes for enforcement, including the Conduct Standards Policy and Framework. The Conduct Standards Policy describes how breaches of our standards will be addressed, including sanctions that may be imposed on employees for violations of this Standard of Conduct and other policies. 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 approved by the Board of State Street Global Advisors, Australia Services Limited, as the Responsible Entity (principle governing body) of the reporting entities covered by this statement (the Funds), on 25 November 2024.

This statement is approved and signed by Jonathan Shead on 25 November 2024 in his role as Director of State Street Global Advisors, Australia Services Limited.



Jonathan Shead

Director

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 International Equities Index Trust, SPDR® S&P®/ASX 200 Fund, and SPDR® S&P®/ASX 200 Listed Property 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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