



**VanEck Video Gaming and eSports UCITS ETF**  
**Sustainability-related information pursuant to Art. 24 of Regulation (EU) 2022/2088 (“SFDR”)**

**Product name:** VanEck Video Gaming and eSports UCITS ETF

**Legal entity identifier:** 6354004UKGUQNCOZOU60

**ISIN:** IE00BYWQWR46

**a) Summary**

VanEck Video Gaming and eSports UCITS ETF (el «Fondo») ha sido incluido en la categoría del artículo 8, apartado 1, del Reglamento (UE) 2019/2088 sobre la divulgación de información relativa a la sostenibilidad en el sector de los servicios financieros («SFDR»). El Fondo promueve características medioambientales o sociales e invierte en empresas que siguen prácticas de buena gobernanza. Para lograr cada una de las características promovidas, el Fondo integra elementos de ASG en su proceso de inversión pasiva mediante exclusiones relacionadas con aspectos ASG en el nivel del índice de referencia que sigue el fondo y a través de voto delegado en cuestiones de sostenibilidad. El Fondo no hace de la inversión sostenible su objetivo de inversión.

El Fondo tiene una política de inversión pasiva, por la que replica lo más fielmente posible su índice de referencia, e invierte en instrumentos financieros directos que se ajustan totalmente a las características medioambientales y sociales que promueve. El objetivo del fondo es invertir en empresas que generen, al menos, el 50 % de sus ingresos (el 25 % en el caso de los componentes actuales) en el sector de los videojuegos o los eSports (deportes electrónicos). Si los ingresos generados por los videojuegos o los eSports para un componente actual del índice caen por debajo del 25 %, la empresa deja de formar parte del índice.

Las inversiones del Fondo deben cumplir los siguientes elementos vinculantes:

1. Las empresas con una calificación de controversia muy grave en relación con los principios del Pacto Mundial de las Naciones Unidas, las Líneas Directrices de la OCDE para Empresas Multinacionales y los Principios rectores de las Naciones Unidas sobre las empresas y los derechos humanos quedan excluidas sobre la base del análisis de su cumplimiento normativo.
2. Las empresas que obtengan el 5 % o más de sus ingresos de actividades relacionadas con el tabaco, el carbón térmico, los combustibles fósiles, las arenas bituminosas, la energía nuclear, las armas de fuego civiles y la industria militar, o que obtengan ingresos de actividades relacionadas con armas controvertidas quedan excluidas sobre la base de cribados por su participación en sectores controvertidos.

A través de sus exclusiones por cuestiones ASG y de su política de voto delegado, el Fondo tiene en cuenta varios indicadores de principales incidencias adversas, por ejemplo, las emisiones de gases de efecto invernadero, la biodiversidad, el agua, los residuos, los asuntos sociales y laborales, el respeto de los derechos humanos o la lucha contra la corrupción y el soborno.

Además, se evalúan las prácticas de buena gobernanza de las empresas en las que se invierte y se excluye de la cartera a empresas que infrinjan las Directrices de la OCDE para Empresas Multinacionales o los Principios

rectores de las Naciones Unidas sobre empresas y derechos humanos o que tengan calificaciones de controversia muy graves.

**b) No sustainable investment objective**

This financial product promotes environmental or social characteristics, but does not have pursue a sustainable investment objective.

**c) Environmental or social characteristics of the financial product**

The Fund promotes the reduction of the most negative impacts on society and the environment. Therefore, the following environmental and social characteristics apply to the Fund’s investments:

1. Exposure to very severe controversies relating to international standards on responsible business, human rights and labour rights is reduced
2. Exposure to controversial business activities relating to tobacco, controversial weapons, energy extractives, civilian firearms and military is minimized.  
Exposure to carbon risk is limited by excluding companies deriving significant (>5%) revenues from energy extractives, such as thermal coal.
3. The Glass Lewis ESG policy guidelines are applied whereby votes are cast on sustainability matters.

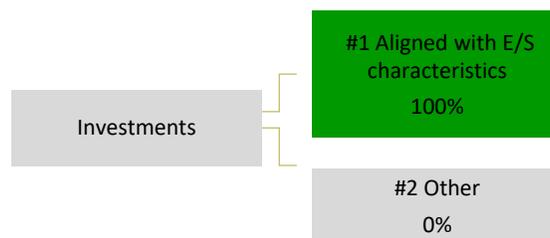
**d) Investment strategy**

The Fund’s investment objective is to replicate, before fees and expenses, the price and yield performance of the MarketVector Global Video Gaming & eSports ESG Index. The Fund seeks to invest in publicly listed companies generating at least 50% of their revenues from video gaming & eSports. Norm-based research and Controversial sector involvement screenings are performed in the selection of companies in the index. In addition, the ESG-tilted voting policy is applied whereby votes are casted on sustainability matters in shareholder meetings of companies in the portfolio.

The Fund excludes companies when ISS rating shows the verifiably violated or imminent to violate the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**e) Proportion of investments**

The Fund invests in direct financial instruments of which 100% is aligned with the environmental and social characteristics that it promotes on the basis that all of the Index holdings are screened against its exclusion strategy.



## f) Monitoring of environmental or social characteristics

The environmental and social characteristics are monitored in the following manner:

1. The Fund promotes the reduction of the most negative impacts on society and the environment.
  - This is measured with the following indicator(s):
    - % of investee companies involved in very severe controversies relating to UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights
    - % of investee companies which derive 5% revenues or more from controversial business activities or any revenues from controversial weapons
    - The number of sustainability matters voted on in shareholder meetings:
  - This is monitored in the following manner:
    - The requirements relating to Norm-based research and Controversial sector involvement screenings (tobacco, fossil fuels, thermal coal mining, gambling, oil sands, civilian firearms, military equipment and services, and nuclear power) are included in the Index rules which are defined by the Index provider.
    - The index is rebalanced on a periodic basis by the index provider.
    - The Fund' Portfolio Management Team replicates the index based on the index rules.
    - Any breaches of the index rules are reported by the Legal and Compliance Team VanEck has policies in place to assess the alignment of the Fund's investments with the index and to undertake recovery measures where necessary.
2. The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.
  - This is monitored in the following manner:
    - VanEck has appointed a service provider to exercise voting rights. VanEck is periodically informed by the service provider on the voting activities.

## g) Methodologies

The screening of companies consists of a few components as described above. The exact methodology of the Fund's environmental and social characteristics are determined by the Index provider. More information can be found in the Fund's index rules.

Voting is delegated to Glass Lewis. Glass Lewis determines the voting approach based on its assessment of the voting proposals and the alignment with the voting policy. VanEck is periodically informed on the activities and has access to an online platform where the information on the proxy voting, policy implementation, recordkeeping and reporting can be found.

## h) Data sources and processing

### *The data sources used*

1. ISS for global norms, revenue exposure and controversial weapons involvement screenings through the Index provider
2. Investee companies' revenues derived from video gaming & eSports through the Index provider.
3. ISS for data on company involvement in non-renewable energy production.
4. Glass Lewis data related to voting activities

### *The measures taken to ensure data quality*

The mentioned data sources are used by VanEck and/or its index provider and service provider. VanEck does not receive most of the the data directly from data providers. With regards to the non-renewable energy production data VanEck utilizes a reporting service whereby calculations can be made in a tool developed by the data

provider. Data quality measures are integrated into the reporting service tool. It is also relevant that the data used by the Index provider and service provider is of sufficient quality. The Index provider and service provider have set up their internal processes to do so. Data quality is a component of the selection process of the index provider.

#### *How data are processed*

VanEck does not process most of the data on its own for the Fund. Other than the reporting service tool VanEck uses, the reports it receives on a periodic basis come from the index provider and the service provider. VanEck is periodically informed on the index construction, implementation, results and progress of the voting activities.

#### *The proportion of data that are estimated*

VanEck does not estimate data, but cannot rule out that the index provider or service provider does estimate data and/or use data provider which estimate data. Although reported data is preferred, missing information is often supplemented with estimated data by the data providers. For more information on how this exactly is determined, we refer to the website of the mentioned data providers, index provider and service provider.

### **i) Limitations to methodologies and data**

VanEck recognizes the following limitations to methodologies and data:

#### **1. Lack of reported data**

In order to attain the environmental and social characteristics, data from external data providers is used by the index provider, VanEck and/or the service provider. Data providers retrieve data from company reports (such as annual reports). Not all companies report the data. Missing data is sometimes estimated by data providers and at times there is no data coverage when it is not possible to estimate the data. This means that in not all cases reported data is present to determine whether the promoted characteristics are attained. By means of choosing a reputable data provider, the risk of erroneous estimates is mitigated.

#### **2. Actualisation of data**

The index provider rebalances the index on a periodic basis. It is possible that the Fund's investments in between the rebalancing moments do not comply with the promoted characteristics.

### **j) Due Diligence**

VanEck does not select investments but uses indices which are constructed by index providers. As described in the monitoring section, VanEck replicates the index and this is monitored by the Portfolio Management Team and the Legal and Compliance Team. VanEck has a due diligence process on the selection of index providers and service providers. The board of VanEck decides on the index selection and appointment of service providers which is prepared by the Portfolio Management Team. VanEck is responsible for monitoring the replication of the index and the service provider.

VanEck's approach is to achieve and maintain the highest standards of integrity, reporting and internal control on all relevant environmental, social, and governance (ESG) matters, sustainability factors in its policies, practices, operational set-up and selection and monitoring of investments as well as identification and mitigation of ESG related risks. A more detailed description on the due diligence that VanEck carries out is available in the ESG Due Diligence Policy, which can be found at the following link: [Policies & Procedures | VanEck](#).

## **k) Engagement policies**

The financial product engagement is limited to dialogues with the index provider in further refining the index rules and can relate to the increasing consideration of sustainability factors in the composition of the index. The VanEck Shareholder Engagement Policy can be found [here](#).

## **l) Designated reference benchmark**

As a passive investments strategy, the Fund has designated the MarketVector™ Global Video Gaming & eSports ESG Index as reference benchmark to meet the environmental and social characteristics that it promotes.

Sustainability factors are considered as part of screenings that are included in the reference benchmark. By means of Norm-based research and Controversial sector involvement screenings the Fund aims to take sustainability factors relating to greenhouse gas emissions, biodiversity, water, waste, social and employee, respect for human rights, anti-corruption and anti-bribery matters into account.

More product-specific information can be found on the website:

<https://www.vaneck.com/nl/en/espo/documents/>.