



**VanEck Sustainable European Equal Weight UCITS ETF  
Pursuant to Art. 24 of Regulation (EU) 2019/2088 ("SFDR")**

**Product name:** VanEck Sustainable European Equal Weight UCITS ETF

**Legal entity identifier:** 2549008OCRQQWIJZNT48

**ISIN:** NL0010731816

**(a) Summary**

VanEck Sustainable European Equal Weight UCITS ETF ("alarahasto") on luokiteltu SFDR-asetuksen (asetus kestävyteen liittyvien tietojen antamisesta rahoituspalvelusektorilla) ("SFDR") (EU) 2019/2088 8 artiklan kohdan 1 mukaiseksi tuotteeksi. Alarahasto edistää ympäristöön ja/tai yhteiskuntaan liittyviä ominaisuuksia ja sijoittaa yrityksiin, jotka noudattavat hyviä hallintotapoja. Edistettyjen ominaisuuksien saavuttamiseksi alarahasto integroi ESG-ominaisuudet passiiviseen sijoitusprosessiinsa tekemällä ESG-kriteereihin perustuvia poissulkemisia alarahaston seuraaman vertailuindeksin tasolla ja äänestämällä kestävään kehitykseen liittyvissä asioissa valtakirjalla. Alarahaston sijoitustavoitteena eivät ole vastuulliset sijoitukset.

Alarahasto noudattaa passiivista sijoituspolitiikkaa, jonka mukaan se jäljittelee mahdollisimman tarkasti vertailuindeksiään ja sijoittaa suoriin rahoitusinstrumentteihin, jotka ovat 100-prosenttisesti linjassa sen edistämien ympäristöön ja yhteiskuntaan liittyvien ominaisuuksien kanssa. Alarahasto pyrkii sijoittamaan sataan likvideimpään ja suurimman pääoman omaavaan eurooppalaisten kehittyneiden markkinoiden yritykseen, jotka noudattavat YK:n vastuullisen yrityskäyttäytymisen Global Compact -periaatteita.

Alarahaston sijoitusten tulee noudattaa seuraavia sitovia elementtejä:

1. Poissulkeminen salkusta perustuen YK:n Global Compactin periaatteiden, OECD:n monikansallisia yrityksiä koskevien ohjeiden ja YK:n liiketoimintaa ja ihmisoikeuksia koskevien ohjaavien periaatteiden rikkomiseen ja sisältää erilaisia ympäristöön, ihmisoikeuksiin ja yrityskäyttäytymiseen liittyviä kriteerejä Moody's Controversy Risk Assessment -seulonnan mukaan;
2. Poissulkeminen salkusta perustuen osallistumiseen kiistanalaisiin aseisiin;
3. Poissulkeminen salkusta perustuen osallisuuteen: alkoholi (> 5 % tuloista), eläinkokeet (> 0 %), armeija (> 0 %), siviilituliaseet (> 0 %), uhkapelit (> 5 %), pornografia (> 3 %), tupakka (> 0 % tuotannosta), torjunta-aineet (> 10 %), tehoviljely (> 0 %) ja ydinvoiman tuotanto (> 0 %).

ESG-seulonta- ja valtakirjaäänestyspolitiikkansa kautta alarahasto ottaa huomioon useita PAI-indikaattoreita, kuten kasvihuonekaasupäästöt, biologinen monimuotoisuus, vesi, jätteet, sosiaaliset ja työntekijöihin liittyvät seikat, ihmisoikeuksien kunnioittaminen, korruption ja lahjonnan vastaiset asiat.

Lisäksi sijoituskohteena olevien yritysten hyviä hallintotapoja arvioidaan sulkemalla salkusta pois yhtiöt, jotka rikkovat seuraavia standardeja Controversy Risk Assessment -seulonnan mukaan: toimitusketjun standardit, korruptio ja rahanpesu, syrjimättömyys ja monimuotoisuus, lapsityövoiman ja pakkotyön poistaminen, työntekijöiden perusoikeudet.

## (b) No sustainable investment objective

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

## a) Environmental or social characteristics of the financial product

The following environmental and social characteristics apply to the Sub-fund's investments:

1. The Sub-fund promotes the reduction of the most negative impacts on society and the environment, through:
  - limiting the exposure to carbon risk, by excluding companies deriving (>0%) revenues from intensive farming;
  - minimizing the exposure to controversies and controversial business activities by means of revenue-based screening and exclusion of companies involved in severe controversies with regards to Environment, Human Rights and Business Behavior.
2. The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.

## (c) Investment strategy

The Sub-fund's investment objective is to replicate, before fees and expenses, the price and yield performance of the Solactive European Equity Index. The Sub-fund seeks to invest in the 100 most liquid, most highly capitalised companies from European Developed Markets that comply with the UN Global Compact Principles for responsible corporate behavior. Additionally, it excludes sectors that do not follow responsible business practices, including: alcohol, animal testing, military, civilian weapons, gambling, pornography, tobacco, nuclear power.

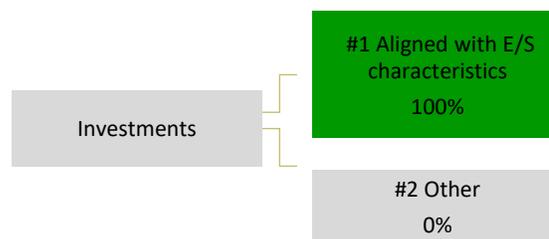
Furthermore, the Glass Lewis ESG-tilted voting policy is applied, whereby casted votes in shareholder meetings of companies in the portfolio concern sustainability matters.

Good governance relates to sound management structures, employee relations, remuneration of staff and tax compliance. The Sub-fund excludes companies with violations of the following standards according to Controversy Risk Assessment:

- Supply chain standards
- Corruption and Money Laundering
- Non-discrimination and diversity
- Elimination of child labour and forced labour
- Fundamental labour rights

## (d) Proportion of investments

The Sub-fund invests in direct financial instruments of which 100% is aligned with the E/S characteristics.



## **(e) Monitoring of environmental or social characteristics**

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

The Sub-fund promotes the reduction of the most negative impacts on society and the environment.

1. This is measured with the following indicator(s):
  - The total GHG Emissions (Scope 1+2+3) Mio EUR Enterprise Value;
  - The % of companies involved in severe controversies and controversial activities from the exclusion list
2. This is monitored in the following manner:
  - The requirements relating to the product involvement and controversy scores of constituents 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 Sub-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 Sub-fund's investments with the index and to undertake recovery measures where necessary.
  - VanEck has policies in place to assess the alignment of the Sub-fund's investments with the index and periodic reports are constructed on the replication of the index and whether the Sub-fund's portfolio is aligned with the index.

The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.

3. 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.

## **(f) Methodologies**

The screening is applied in the following fashion:

1. Companies are excluded if they do not meet the screening criteria for sustainability factors based on information from V.E., a Moody's companyinfo EIRIS. An analysis is conducted whether the products and/or services of companies from a sustainability perspective are considered undesirable. For example, companies active in the production of alcohol, animal testing, weapons manufacturing, tobacco industry, gambling industry, nuclear energy, genetically modified products, adult entertainment and violations of UN Global Compact principles concerning human rights, labour rights, anti-bribery, biodiversity and environmental pollution.
2. Companies are screened for involvement in cluster munitions-activities production.
3. On a periodic basis the composition of the Index is screened for aforementioned sustainability factors on a quarterly basis. Companies no longer satisfying the requirements are replaced/excluded from the index.

The exact methodology of the integration of the Sub-fund's environmental and/or social characteristics is determined by the index provider. More information can be found in the Sub-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.

## **(g) Data sources and processing**

The data sources used

- V.E., Moody's data for controversies and product involvement screening
- ISS for the Greenhouse Gas (GHG) Emissions Data

- ISS for the controversial activities data
- Glass Lewis data related to voting activities

The index provider and voting service provider may use their own additional data sources.

*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 data directly from data providers and therefore has not taken measures to ensure data quality for the data which VanEck does not directly receive from data providers. For the data which VanEck does use directly from data providers, it uses a reporting service tool where data quality measures are integrated into. It is of course 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 processes a limited amount of data on its own for the Sub-fund. Data from data providers or the index provider is processed to measure the Sub-fund's environmental and social characteristics based on the Sub-fund's investments as per the end of the year. 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.

**(h) 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 Sub-fund's investments in between the rebalancing moments do not comply with the promoted characteristics.

**(i) 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 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](#).

**(j) 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](#).

**(k) Designated reference benchmark**

As a passive investments strategy, the Sub-fund has designated the Solactive European Equity 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 and assessed at any rebalancing of the underlying Index. By means of Controversy Risk Assessment and Controversial sector involvement screenings the Sub-fund takes 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 information on the reference benchmark can be found on the website:  
<https://www.vaneck.com/nl/en/teet/documents/>.