

VanEck ESG Due Diligence Policy

In this policy, we will detail VanEck's approach 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.

European ESG Committee

VanEck has established a European ESG Committee ("ESG Committee") with the goal to establish, maintain and further develop and monitor ESG strategies offered by VanEck Asset Management B.V., VanEck (Europe) GmbH and VanEck ETP AG (the "Companies"). The ESG Committee is comprised of the managing directors of the Companies and at least one member of the following departments: Capital Markets, Portfolio Management, Product Management, Sales, Legal, and Compliance. The functional heads of the aforementioned departments shall determine at least one team member as the ESG delegate to the Committee. Such team member shall have demonstrable competence in ESG matters.

Responsibilities of the ESG Committee include:

- a) conducting ongoing reviews of the ESG strategies and sustainability characteristics of all products and services offered by the Companies;
- b) analysing whether the sustainability characteristics and sustainability strategy of the products and services may be changed or improved (e.g. to achieve Taxonomy alignment) in order to further enhance VanEck's contribution to sustainable asset management;
- c) monitoring transparency and overall compliance in accordance with the Sustainable Finance Disclosure Regulation ("SFDR") and related laws, regulations and industry standards with regard to all products and services;
- d) monitoring reasonable sustainability risk management for the products and Services as described in the "VanEck – Integration of Sustainability Risks" statement, available at www.vaneck.com;
- e) measuring and analysing the Principal Adverse Impacts ("PAI") according to the "Consideration of Sustainability Adverse Impacts" statement, available at www.vaneck.com;
- f) making recommendations to the relevant departments and/or the Management Committee as it considers appropriate of changes and amendments with regards to a) to e).
- g) reviewing the target market of all products according to the ESG Preferences under MiFID and making changes where appropriate;
- h) reviewing and approving all ESG-related statements and announcements published by VanEck; and
- i) supporting the external auditors and coordinating provision of reports to auditors.

Product development and Product categorization

When VanEck is evaluating new product ideas, it often aims at integrating ESG factors into the construction process. As VanEck offers mostly passively managed products (ETFs), this involves working closely with Index Providers to determine and apply rules and screenings in order to integrate the ESG factors into the investment process. This may include the avoidance of controversial sectors or UN Global Compact violators, but can also introduce ESG ratings to determine weights of index constituents. In some cases, the product idea has a sustainable or social objective and will strive to apply article 9 of the SFDR satisfying all relevant requirements. For SFDR Article 9 categorized products, VanEck aims at considering

most of the Principal Adverse Indicators (PAI). For SFDR Article 8 categorized products, the screening will aim to consider several relevant PAIs.

Principal Adverse Impacts (PAI)

Principal Adverse Impacts are defined as: negative, material, or potentially material effects on sustainability factors that result from, worsen, or are directly related to investment decisions or advice performed by a legal entity. Examples are GHG emissions and water emissions. There are 18 mandatory Principal Adverse Indicators. VanEck determines the relevant and applicable PAIs for each product and considers them by using data from external ESG data providers. Using the ESG data VanEck monitors coverage of the PAIs and reports results on each PAI on an aggregated bases. VanEck partly relies on Index Providers to integrate certain PAI into the Index construction process. VanEck reviews the relevant applicable PAIs per product on an annual basis. Suggested changes with regards to the consideration of PAIs are presented to, analysed and decided upon by the European ESG Committee.

Principal Adverse Impact Statement

European legislation requires VanEck, to disclose whether they take into account principal adverse impacts of its investment decisions on sustainability factors. Sustainability factors are defined in the legislation as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

VanEck does consider the adverse impacts of investment decisions on sustainability factors. One of the requirements for firms considering adverse impacts of investment decisions on sustainability factors is to disclose the mandatory PAI at the management company level on an aggregated basis. VanEck will generate and publish periodic PAI reports. The PAI reports will be produced based on ISS data (the “Principal Adverse Indicator Dataset”).

The Principal Adverse Impact Statement of VanEck is available at www.vaneck.com.

Taxonomy related disclosures

For Article 8 and 9 SFDR products, pre-contractual disclosures are provided to investors, specifying the proportion of investments aligned with the EU Taxonomy. At this point in time, data on Taxonomy alignment is very limited and VanEck has therefore decided to set the minimum proportion to 0% for all products. The ETFs percentage of taxonomy alignment is the result of the Index construction and its minimum alignment is currently not part of this process. We have subscribed to the Taxonomy module of ISS, which will allow us to monitor the availability of this data for our funds and implement changes once data improves.

European ESG Template (EET)

As from August 2022, VanEck is making the European ESG Template (EET) available through its data providers. The EET aims at exchanging critical ESG fund and regulatory data between data providers. The EET template indicates for each product whether PAI are considered, the percentage invested in sustainable investments and whether the product considers end client sustainability preferences. For Article 8 and 9 SFDR funds it also indicates which specific PAIs are considered. The EET will be maintained by the Product Management team and impactful changes discussed and approved by the European ESG Committee.

Sustainability related disclosure (SFDR Templates)

The SFDR Template includes the pre-contractual information on the Environmental or social objectives or characteristics promoted by each product. It details the binding elements and provides sustainability indicators which evaluate the attainment of the environmental and/or social objectives or characteristics promoted by the relevant product. The disclosure also provides a minimum percentage which will be invested in sustainable investments. For the Article 8 SFDR funds, this percentage is currently 0%. Due to the limited scope of the SFDR definition of sustainable investments it is prudent to not provide a minimum percentage at this time. For the Article 9 SFDR funds, the minimum percentage is indicated as 100%, whereby small deviations may occur due to cash positions and portfolio management related activities.