

## VanEck - Sustainability Characteristics

Currently, 21 VanEck funds are classified as products which integrate sustainability characteristics.

For passive funds, the investment policy of the fund is to follow the index as closely as possible. In the composition of the indices, environmental, social and governance (“ESG”) aspects are taken into account in the composition of the indices of the funds classified as Article 8 and 9 under the Sustainable Finance Disclosure Regulation (“SFDR”). Companies, for instance, are excluded based on ESG screenings. The sustainability characteristics for these VanEck funds are described more thoroughly in the relevant product information.

The following VanEck funds are classified as:

- SFDR Art. 8: products with environmental and social characteristics.
- SFDR Art. 9: products with a sustainable investment objective.

SFDR Art. 8
VanEck Morningstar US Sustainable Wide Moat UCITS ETF
VanEck Video Gaming and eSports UCITS ETF
VanEck Semiconductors UCITS ETF
VanEck New China ESG UCITS ETF
VanEck Smart Home Active UCITS ETF
VanEck Space Innovators UCITS ETF
VanEck iBoxx EUR Corporates UCITS ETF
VanEck Sustainable European Equal Weight UCITS ETF
VanEck Global Real Estate UCITS ETF
VanEck Morningstar Developed Markets Dividend Leaders UCITS ETF
VanEck Sustainable World Equal Weight UCITS ETF
VanEck Multi-Asset Conservative Allocation UCITS ETF
VanEck Multi-Asset Balanced Allocation UCITS ETF
VanEck Multi-Asset Growth Allocation UCITS ETF
VanEck Emerging Markets Equity UCITS
VanEck Emerging Markets Bond UCITS

SFDR Art. 9
VanEck Hydrogen Economy UCITS ETF
VanEck Sustainable Future of Food UCITS ETF
VanEck Genomics and Healthcare Innovators UCITS ETF
VanEck Circular Economy UCITS ETF
VanEck Bionic Engineering UCITS ETF

This document describes the sustainability characteristics for VanEck’s UCITS ETFs (“ETFs”) under Section I. and VanEck’s actively managed UCITS (“Active Funds”) under Section II.

## I. SUSTAINABILITY CHARACTERISTICS OF VANECK'S ETFS

The investment policy of the ETFs is to follow an index as closely as possible. In the composition of the indices, ESG aspects can be considered. The specific characteristics are described for each of the ETFs below.

For all equity ETFs the ESG proxy voting policy applies. Sustainability factors are taken into account when casting votes at shareholders' meetings.

### **VanEck Morningstar US Sustainable Wide Moat UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the Morningstar US Sustainability Moat Focus Index. The screening consists of several components:

1. All companies must have current ESG and controversy scores.
2. The controversy score must be 4 (out of 5) or lower throughout the trailing 3 years.
3. The ESG risk of the company should be medium, low or negligible.
4. If the company is rated for carbon risk, its category is not high or severe.
5. Companies do not have:
  - a) more than 50% tobacco products involvement by revenue.
  - b) any involvement in production of controversial weapons (as defined by third-party Sustainalytics Global Compact Compliance Service exclusionary lists).
  - c) any involvement in the manufacturing of firearms sold to civilian customers; or
  - d) any involvement in thermal coal (extraction or power generation).

Companies which do not comply with the screening criteria are excluded from the Index.

Additionally, the index targets an aggregate Sustainalytics ESG Risk score that would be in the top 32.5% of the respective Morningstar fund universe, equivalent to Morningstar Sustainability rating of 4 globes. By means of an iterative selection process the worst ESG performers are replaced until the target score is reached.

Exclusions required by international laws and treaties apply to this ETF. The ETF does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Video Gaming and eSports UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MarketVector Global Video Gaming & eSports ESG Index. Through the screening process, companies that violate certain ESG criteria included in the following categories, are not included:

- Norm-based research, concerning in particular the following thematic areas: Union Rights, Workplace Discrimination, Bribery, Child Labour, Environmental Protection, Fundamental Human Rights, Forced Labour, Labour Standards, Money Laundering. Companies with a Case Severity Indicator score of 'Very Severe' are not included in the portfolio. The 'Very Severe' value identifies instances where the company is reportedly causing/contributing to critical adverse impact.
- Controversial weapons, which takes into consideration: Anti-personnel Mines, Biological Weapons, Chemical Weapons, Cluster Munitions, Depleted Uranium, Incendiary Weapons, Nuclear Weapons Outside NPT, Nuclear Weapons Inside NPT and White Phosphorus Weapons. These factors assign an overall Red, Amber, or Green flag to an issuer based on the issuer's involvement in the different categories of controversial weapons. Companies with a "Red" flag are excluded from the portfolio.
- Sector and energy extractive exposure screening, with consideration of Tobacco, Thermal Coal Mining, Fossil Fuel, Oil Sands, Military Equipment and Services and Nuclear Power. Only companies that derive not more than 5% of their revenues from the mentioned activities, can be included in the portfolio.
- Exclusions required by international laws and treaties apply to this ETF. The ETF does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Semiconductors UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MVIS US Listed Semiconductor 10% Capped ESG Index. Through the screening process, companies will be removed from the index if:

- They are involved in severe social norms violations.
- They have greater than 0% revenue exposure to controversial weapons.
- They do not exceed 5% thresholds of revenue exposure to various sectors including, but not limited to, tobacco, thermal coal mining, gambling, fossil fuels and oil sands.
- Exclusions required by international laws and treaties apply to this ETF. The ETF does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck New China ESG UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MarketGrader New China ESG Index. The index consists of companies which have an above median performance in their peer group based on the OWL Analytics consensus ESG Score. Companies are scored and ranked in its coverage universe across thirty core metrics, including 12 key performance indicators ("KPIs"), that quantify company behavior across ESG factors.

Exclusions required by international laws and treaties apply to this ETF. The ETF does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Smart Home Active UCITS ETF**

The ETF is actively managed, with (potential) portfolio companies being evaluated by the investment advisor. The investment advisor uses external ESG data providers to determine the ESG performance of companies. Industry data from MSCI are used for the screening of investments. Relevant topics for the fund are data security and privacy and carbon emissions.

In addition to exclusions required by international laws and treaties, direct or indirect exposure to controversial sectors from an environmental, social and governance perspective is avoided for the fund. The list of exclusions names several sectors, activities and violations on the basis of which a company will be excluded from the fund's investment universe. In reviewing the list of exclusions, the investment advisor intends to compile a list of exclusions to exclude companies from its investment universe that have been determined to have serious ESG or other issues or are active in undesirable sectors. In compiling the list of exclusions, the investment advisor intends to closely align the list of exclusions with that of the Norges Bank because of its extensive coverage and proactive responsible investing policy. Entities which are anticipated to be included on the exclusions list include those engaged in weapons production, tobacco, engagement with sanctioned countries, involvement in systematic human rights violations, severe environmental damage and gross corruption. The exclusion list of Norges Bank can be found here: [Observation and exclusion of companies | Norges Bank Investment Management \(nbim.no\)](#).

VanEck's engagement policy applies to this ETF. The policy can be found [here](#).

### **VanEck Space Innovators UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MVIS® Global Space Industry ESG Index. Through the screening process, companies are removed from the index if:

- They are involved in severe severe or very severe social violations.
- They have greater than 0% revenue exposure to controversial weapons.
- They do not exceed 5% thresholds of revenue exposure to various sectors including, but not limited to, tobacco, thermal coal mining, gambling, fossil fuels and oil sands.

Exclusions required by international laws and treaties apply to this ETF. The ETF does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck iBoxx EUR Corporates UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the iBoxx SD-KPI EUR Liquid Corporates Index. Companies are assessed for environmental, social and governance factors which leads to a total Sustainable Development Key Performance Indicator (SD-KPI) score on a scale of 0 to 100. Companies with a score of 40 or lower are underweighted in the index. Companies with a score of 60 or higher are over weighted in the index. Exclusions required by international laws and treaties apply to this ETF. The ETF does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Sustainable European Equal Weight UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the Solactive European Equity Index. This screening is based on the ten principles of the UN Global Compact as well as specific exclusions related to controversial sectors. Companies in violations of UN Global Compact principles or going beyond predefined thresholds for controversial sectors will be removed from the index. The extensive list of the controversial sectors that are screened out include: Alcohol, Animal Testing, Controversial weapons, Firearms, Gambling, Genetic engineering, Hazardous chemicals, Intensive farming, Nuclear, Military production, Production of fur, Pornography, Tobacco. In addition, there is also a second screening level based on Cluster Munition activities and secondly on the UNGC Scores, where the top 5 companies performing worst in terms of environment, human rights, labor rights and anticorruption are removed.

Exclusions required by international laws and treaties apply to this Fund. The Fund does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Global Real Estate UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the GPR Global 100 Index. The index is screened on the Public Disclosure Level score (which ranges from the scores A-E) generated by GRESB - Global Real Estate Sustainability Benchmark. This score indicates how much information about sustainability is made transparent by real estate companies. The worst performing companies fall into category E and are excluded from the index. The remaining stock weights are also adjusted based on their Public Disclosure Level score.

Exclusions required by international laws and treaties apply to this Fund. The Fund does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Morningstar Developed Markets Dividend Leaders UCITS ETF**

A limited ESG screening is applied to the ETF's reference benchmark: the Morningstar® Developed Markets Large Cap Dividend Leaders Index<sup>SM</sup>.

The Index applies the following additional screenings:

- United Nations Global Compact screen: the five worst-performing companies in the Moody's ESG universe for each of the categories (human rights, labor, environment, and anti-corruption) are ineligible.
- Munitions screen: companies that are substantially involved in the production or distribution of cluster ammunition systems are ineligible.

Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Sustainable World Equal Weight UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the Solactive Sustainable World Equity Index. This screening is applied based on indications from V.E, part of Moody's ESG Solutions. This screening is based on the ten principles of the UN Global Compact as well as specific exclusions related to controversial sectors. Companies in violations of UN Global Compact principles or going beyond predefined thresholds for controversial sectors will be removed from the index. The extensive list of the controversial sectors that are screened out include: Alcohol, Animal Welfare, Controversial weapons, Firearms, Gambling, Genetic engineering, Hazardous chemicals, Intensive farming, Nuclear, Military production, Production of fur, Pornography, Tobacco. In addition, a second screening level is applied,

whereby all companies involved in the Cluster Munition activities and those in the bottom 5 in terms of environment, human rights, labor rights and anticorruption according to UNGC Scores, are removed. Detailed information about the index construction can be found on the index page of the ETF.

### **VanEck Multi-Asset Conservative Allocation UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the Multi-Asset Conservative Allocation Index. The Index is a composite index encompassing four indices. The following three constituent indices integrate ESG factors within their methodologies:

1. *Solactive Sustainable World Equity Index*

ESG-screening is applied to the Index. The screening consists of three elements:

- Companies are excluded if they do not meet the screening criteria for sustainability factors based on information from Vigeo EIRIS (Moody's). 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, genetic modification, adult entertainment and violations of UN Global Compact principles concerning human rights, labour rights, anti-bribery, biodiversity and environmental pollution.
- Companies are screened for clustermunition-activities.
- On a periodic basis the composition of the Index is screened for sustainability factors. Companies no longer satisfying the requirements are replaced.

2. *GPR Global 100 Index*

The Index is screened on the Public Disclosure Level score generated by GRESB (Global Real Estate Sustainability Benchmark). This score indicates how much information about sustainability is made transparent by real estate companies. The worst performing companies fall into category E and are excluded from the Index. The remaining stock weights are also adjusted based on their Public Disclosure Level score.

3. *iBoxx SD-KPI EUR Liquid Corporates Index*

ESG screening is applied to the Index. Companies are assessed for environmental, social and governance factors which leads to a total Sustainable Development Key Performance Indicator (SD-KPI) score on a scale of 0 to 100. Companies with a score of 40 or lower are underweighted in the index. Companies with a score of 60 or higher are overweighted in the index.

### **VanEck Multi-Asset Balanced Allocation UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the Multi-Asset Balanced Allocation Index. The Index is a composite index encompassing four indices. The following three constituent indices integrate ESG factors within their methodologies:

1. *Solactive Sustainable World Equity Index*

ESG-screening is applied to the Index. The screening consists of three elements:

- Companies are excluded if they do not meet the screening criteria for sustainability factors based on information from Vigeo EIRIS (Moody's). 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, genetic modification, adult entertainment and violations of UN Global Compact principles concerning human rights, labour rights, anti-bribery, biodiversity and environmental pollution.
- Companies are screened for clustermunition-activities.
- On a periodic basis the composition of the Index is screened for sustainability factors. Companies no longer satisfying the requirements are replaced.

2. *GPR Global 100 Index*

The Index is screened on the Public Disclosure Level score generated by GRESB (Global Real Estate Sustainability Benchmark). This score indicates how much information about sustainability is made transparent by real estate companies. The worst performing companies fall into category E and are excluded from the Index. The remaining stock weights are also adjusted based on their Public Disclosure Level score.

3. *iBoxx SD-KPI EUR Liquid Corporates Index*

ESG screening is applied to the Index. Companies are assessed for environmental, social and governance factors which leads to a total Sustainable Development Key Performance Indicator (SD-KPI) score on a scale of 0 to 100. Companies with a score of 40 or lower are underweighted in the index. Companies with a score of 60 or higher are overweighted in the index.

### **VanEck Multi-Asset Growth Allocation UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the Multi-Asset Growth Allocation Index. The Index is a composite index encompassing four indices. The following three constituent indices integrate ESG factors within their methodologies:

1. *Solactive Sustainable World Equity Index*

ESG-screening is applied to the Index. The screening consists of three elements:

- Companies are excluded if they do not meet the screening criteria for sustainability factors based on information from Vigeo EIRIS (Moody's). 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, genetic modification, adult entertainment and violations of UN Global Compact principles concerning human rights, labour rights, anti-bribery, biodiversity and environmental pollution.
- Companies are screened for cluster munition-activities.
- On a periodic basis the composition of the Index is screened for sustainability factors. Companies no longer satisfying the requirements are replaced.

2. *GPR Global 100 Index*

The Index is screened on the Public Disclosure Level score generated by GRESB (Global Real Estate Sustainability Benchmark). This score indicates how much information about sustainability is made transparent by real estate companies. The worst performing companies fall into category E and are excluded from the Index. The remaining stock weights are also adjusted based on their Public Disclosure Level score.

3. *iBoxx SD-KPI EUR Liquid Corporates Index*

ESG screening is applied to the Index. Companies are assessed for environmental, social and governance factors which leads to a total Sustainable Development Key Performance Indicator (SD-KPI) score on a scale of 0 to 100. Companies with a score of 40 or lower are underweighted in the index. Companies with a score of 60 or higher are overweighted in the index.

### **VanEck Hydrogen Economy UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MVIS® Global Hydrogen Economy ESG Index. The index consists primarily of companies that generate a substantial part of their revenues from hydrogen products or projects. These companies contribute to the development and production of hydrogen technology to enhance sustainable forms of energy generation and to reduce carbon emissions. The fund contributes to these environmental objectives by investing in these companies.

ESG screenings are applied to the index construction to ensure that the companies do not significantly harm any other environmental or social sustainable investment objective. Companies are screened for activities which may negatively affect sustainability factors. The screenings consist of various components:

- Norms-Based Research. Companies are screened for violations of international standards concerning various norms such as human rights, labor rights, environmental risk and bribery.
- Companies are also screened for involvement in civilian firearms and are excluded.
- Companies with involvement in controversial weapons are excluded from the index.
- Exclusions apply to companies with 5% revenue or more derived from activities in the tobacco industry, thermal coal mining, gambling, oil sands, military equipment and services and nuclear power.
- Exclusions required by international laws and treaties apply to this Fund. The ETF does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the ETF.



### **VanEck Sustainable Future of Food UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MVIS® Global Future of Food ESG Index. The index consists primarily of companies that generate a substantial part of their revenues from following sub-themes: (A) Plant-Based or Cultured Meat, Protein or Dairy alternatives; (B) Vertical or Urban Farming - this includes agricultural companies that grow crops vertically, in greenhouses or specialize in localized farming; (C) Precision Agriculture - this includes irrigation and smart water grid equipment, greenhouse equipment, or autonomous/robotic farming or agriculture-related equipment but excludes agricultural chemicals and plant seeds; (D) Food Flavors and Functional Ingredients; or (E) Organic or Health Foods - this includes packaged foods, or agricultural products but excludes meat, poultry, fish or vitamins.

In addition, companies that meet certain ESG standards related to food and agriculture sustainability and safety are also included as follows and referred to as sub-theme F. The ETF contributes to these environmental objectives by investing in these companies.

ESG screenings are applied to the index construction to ensure that the companies do not significantly harm any other environmental or social sustainable investment objective. Companies are screened for activities which may negatively affect sustainability factors. The screenings consist of various components:

- Norms-Based Research. Companies are screened for violations of international standards concerning various norms such as human rights, labor rights, environmental risk and bribery.
- Companies are also screened for involvement in civilian firearms and are excluded.
- Companies with involvement in controversial weapons are excluded from the index.
- Exclusions apply to companies with 5% revenue or more derived from activities in the tobacco industry, thermal coal mining, gambling, oil sands, military equipment and services and nuclear power.
- Exclusions required by international laws and treaties apply to this Fund. The Fund does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the fund.

### **VanEck Genomics and Healthcare Innovators UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MVIS® Global Future Healthcare ESG Index. The index consists primarily of companies that generate a substantial part of their revenues from: Healthcare therapies based on the targeting or modification of genetic makeup of cells or use mRNA; Technology platforms that enable the development of genetics-based healthcare therapies; Laboratory equipment or services used to test, code, or develop genetics-based healthcare therapies; Software used to facilitate online medical consultations; E-Commerce pharmacies; Software for the management of medical practices and/or patient records; Outpatient medical Internet of Things devices which allow remote monitoring of health indicators such as heart rate and rhythm, or glucose levels.

ESG screenings are applied to the index construction to ensure that the companies do not significantly harm any other environmental or social sustainable investment objective. Companies are screened for activities which may negatively affect sustainability factors. The screenings consist of various components:

- Norms-Based Research. Companies are screened for violations of international standards concerning various norms such as human rights, labor rights, environmental risk and bribery.
- Companies are also screened for involvement in civilian firearms and are excluded.
- Companies with involvement in controversial weapons are excluded from the index.
- Exclusions apply to companies with 5% revenue or more derived from activities in the tobacco industry, thermal coal mining, gambling, oil sands, military equipment and services and nuclear power.
- Exclusions required by international laws and treaties apply to this Fund. The Fund does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the fund.

### **VanEck Circular Economy UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MVIS® Global Circular Economy ESG Index. The index consists primarily of companies that generate a substantial part of their revenues from water purification and treatment products or services, waste-to-energy and biofuels, general waste management services that include

recycling services, metal recycling services. The Index also includes companies with at least 50% of their revenues (25% for current components) from products that are made of - or services related to - recycled, repurposed, or reused materials.

ESG screenings are applied to the index construction to ensure that the companies do not significantly harm any other environmental or social sustainable investment objective. Companies are screened for activities which may negatively affect sustainability factors. The screenings consist of various components:

- Norms-Based Research. Companies are screened for violations of international standards concerning various norms such as human rights, labor rights, environmental risk and bribery.
- Companies are also screened for involvement in civilian firearms and are excluded.
- Companies with involvement in controversial weapons are excluded from the index.
- Exclusions apply to companies with 5% revenue or more derived from activities in the tobacco industry, thermal coal mining, gambling, oil sands, military equipment and services and nuclear power.
- Exclusions required by international laws and treaties apply to this Fund. The Fund does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the fund.

### **VanEck Bionic Engineering UCITS ETF**

An ESG screening is applied to the ETF's reference benchmark: the MVIS® Global Bionic Healthcare ESG Index. The index consists primarily of companies that generate a substantial part of their revenues from medical, dental or vision-related implants, bioprinting, prosthesis, or preservation of organs and tissue. The index does not include companies involved in implantable or wearable devices or materials used only for cosmetic purposes.

ESG screenings are applied to the index construction to ensure that the companies do not significantly harm any other environmental or social sustainable investment objective. Companies are screened for activities which may negatively affect sustainability factors. The screenings consist of various components:

- Norms-Based Research. Companies are screened for violations of international standards concerning various norms such as human rights, labor rights, environmental risk and bribery.
- Companies are also screened for involvement in civilian firearms and are excluded.
- Companies with involvement in controversial weapons are excluded from the index.
- Exclusions apply to companies with 5% revenue or more derived from activities in the tobacco industry, thermal coal mining, gambling, oil sands, military equipment and services and nuclear power.
- Exclusions required by international laws and treaties apply to this Fund. The Fund does not invest into companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

The Index Provider utilizes ESG data provided by Institutional Shareholder Services group of companies (ISS).

Detailed information about the index construction can be found on the index page of the fund.



## II. SUSTAINABILITY CHARACTERISTICS OF VANECK'S ACTIVE FUNDS

### VanEck Emerging Markets Equity UCITS

Financially material ESG factors are integrated into the Fund's investment process. The Fund is actively managed, with (potential) investee companies being evaluated by the investment team (the "Team"). The Team uses external ESG data providers to determine ESG performance of investments and integrates ESG factors into its investment decisions. Additionally, the Team applies exclusions. The activities relating to ESG integration and exclusions are further described below.

#### - ESG integration:

The Team assesses sustainability risks and opportunities by conducting fundamental and bottom-up research on the companies. ESG factors are assessed by looking for both negative proscription and positive progression. In cases where it seems warranted, the valuation model for a company may incorporate a higher discount rate or additional estimated future costs to account for certain ESG risk factors. In contrast, future growth estimates for a company may reflect higher growth opportunities opened by ESG factors.

The Team considers ESG guidance frameworks such as the Sustainability Accounting Standards Board ("SASB") that sets standards for the disclosure of financially material sustainability information by companies to their investors. The Team also leverages external ESG data sources for raw company data and screening of investments for financially material ESG risks and opportunities (ISS, Refinitiv, Bloomberg ESG, third-party research, etc.).

#### - Exclusions:

In addition to compliance with exclusions required by international laws and treaties, including those of, for example, the European Union, United Nations and the Office of Foreign Assets Control of the United States, the fund intends to reduce material, direct or indirect, exposure to controversial sectors from an environmental, social and governance perspective. Therefore, the following exclusionary screenings are applied to the Fund:

- Companies are excluded if they derive 10% or more of their revenue from fossil fuels, weapons, tobacco and/or pornography activities. The Sub-Fund employs ISS to screen for the controversial activities.
- Companies are also excluded if they are involved in the production of coal or coal-based energy, nuclear weapons, tobacco, severe environmental damage, unacceptable greenhouse gas emissions, violation of human rights, serious violations of individuals' rights in situations of war or conflict, other particularly serious violations of fundamental ethical norms, gross corruption, etc. The fund applies the exclusion list of Norges Bank because of its extensive coverage and proactive responsible investing policy. The exclusion list of Norges Bank can be found here: [Observation and exclusion of companies | Norges Bank Investment Management \(nbim.no\)](https://www.nbim.no).

VanEck defines the Fund's status as a shareholder in two ways:

1. Through active engagement and ownership: VanEck's engagement policy applies to the Fund. The policy can be found [here](#).
2. Via the proxy voting policy applies. Sustainability factors are taken into account when casting votes at shareholders' meetings.

### VanEck Emerging Markets Bond UCITS

Financially material ESG factors are integrated into the Active Fund's investment process. The Fund is actively managed, with (potential) investee corporate companies and sovereigns being evaluated by the investment team (the "Team"). The Team uses external ESG data providers to determine ESG performance of investments and integrates ESG factors into its investment decisions. Additionally, the Team applies exclusions.

The activities relating to ESG integration and exclusions are further described below.

#### - ESG integration:

The Team assesses sustainability risks and opportunities by conducting fundamental and bottom-up research on the corporate companies and sovereigns. This means ESG factors can affect target prices, the fundamental assessment of a company or country and/or the portfolio construction methodology. The analysis of ESG risks and opportunities is integral to the Team's investment process.

The team leverages investment frameworks to assess what ESG risks and opportunities apply to a specific investment and to identify the most salient ESG factors for the portfolio. In the assessment of investments, the team considers ESG

guidance frameworks such as the Emerging Markets Investors Alliance (“EMIA”) that enables emerging markets investors to support good governance, promote sustainable development and improve investment performance in the governments and companies in which they invest.

In the assessment of corporates, ESG scores from ISS, RobecoSAM, Bloomberg ESG and MSCI are considered in the analysis. In the assessment of sovereigns, various ESG data sources are considered, such as the World Bank data, Yale University’s Environmental Performance Index and IMF’s Debt Sustainability Analyses.

*- Exclusions:*

In addition to exclusions required by international laws and treaties such as the European Union, United Nations and the Office of Foreign Assets Control of the United States, the Fund intends to avoid material, direct or indirect, exposure to controversial activities from an environmental, social and governance perspective. For avoidance of doubt, 10% or more of an investment’s revenue is considered to be material exposure. Controversial activities are defined as activities relating to coal or coal-based energy, weapons, tobacco, severe environmental damage and/or violations of human rights. The list of exclusions names specific sectors, activities, and violations on the basis of which an investment will be excluded from the Sub-Fund’s investment universe. In reviewing the list of exclusions, the Investment Manager intends to compile a list of exclusions to exclude investments from its investment universe that have been determined to have serious ESG or other issues or are active in undesirable sectors. Therefore, the following exclusionary screenings are applied to the Sub-Fund:

Investments are excluded when they do not pass:

- Step 2 of the investment process as described in the related section above (applicable to corporates and sovereigns).
- The ISS norms-based research, meaning that investments are red flagged by severity of impact as very severe (code red) (applicable to corporates only).
- The ISS screening for coal or coal-based energy, weapons and/or tobacco activities, meaning that investments derive 10% or more of their revenue from the aforementioned activities (applicable to corporates only), and
- The Norges Bank exclusionary list (applicable to corporates only [Observation and exclusion of companies | Norges Bank Investment Management \(nbim.no\)](#)) because involved in the production of coal or coal-based energy, nuclear weapons, tobacco, severe environmental damage, unacceptable greenhouse gas emissions, violation of human rights, serious violations of individuals’ rights in situations of war or conflict, other particularly serious violations of fundamental ethical norms, gross corruption, etc.

In addition, VanEck’s engagement policy applies to the Fund. The policy can be found [here](#).