

3 March 2023

## Summary of Complaints Handling Procedure of VanEck Asset Management B.V. and VanEck (Europe) GmbH

### 1. Introduction

This Complaints Handling Procedure (the "Procedure") is based on the conduct, organisational and transparency obligations of VanEck Europe GmbH and VanEck Asset Management B.V. (hereafter "VanEck"). This Procedure regulates the complaints handling guidelines and process with regards to complaints received from investors or clients or potential clients of VanEck. In order to adequately protect the legitimate interests of investors and clients VanEck will ensure through this Procedure that:

- complaints are dealt with promptly and resolved as quickly as possible;
- review of the complaints is fair and respectful to all parties involved;
- complainants are given specific and understandable explanations for decision directly relating to the complaints; and
- complaints are taken into consideration and used as a foundation for constant improvement of our services and annual review of our complaints policy and procedures.

### 2. What do we mean by a complaint?

A complaint is any expression of dissatisfaction that a client or a potential client ("Complainant") raises to VanEck in connection with a product offered by VanEck or the provision of an investment service or an ancillary service. The term "complaint" does not necessarily have to be used. The Complaint does not require any specific form.

### 3. What do we need from you to process your complaint?

To enable us to efficiently investigate your complaint, complaints should be handed in as close as possible to the related event of subject matter. Your complaint should include the following information:

- the date your case or matter occurred;
- the product or service relating to the complaint; and
- what occurred and how you have been affected.

### 4. Where can you file a complaint?

If you are in contact with a client relationship manager your questions or complaints should be addressed to the client relationship manager via phone or by email. In addition you are invited to send a written complaint by email to [complaints-europe@vaneck.com](mailto:complaints-europe@vaneck.com) or as a letter to one of the following addresses.

VanEck (Europe) GmbH  
Attn. Compliance/Complaints Handling  
Kreuznacher Str. 30  
60486 Frankfurt/Main  
Germany

or

VanEck Asset Management B.V.  
Barbara Strozziilaan 310  
1083 HN Amsterdam  
Netherlands

### 5. What will happen with your Complaint?

VanEck's management and compliance department will take the following steps:

- Confirm the receipt of the complaint within 5 working days to the complainant;
- Interview the manager of the employee who was responsible for your case or matters;
- ask for more information from the responsible employee if necessary;

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- ask you for more information if necessary;
- assess all information and weigh the arguments of both sides;
- take a final position;
- inform you within 15 working days in writing about our position and give arguments why we have reached this position;
- inform you in good time if it appears in the meantime that we cannot take a position within 15 working days and explain the reasons for the delay and when to expect our position;
- ensure correct registration of your complaint in the complaints schedule of VanEck with complaint number, date, subject, content and status.

### 6. What can you do if we declare your complaint unfounded?

#### In Germany:

- If your complaint is about a financial product or a financial service you can also approach the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht; "BaFin"). Further information may also be found here:  
[https://www.bafin.de/EN/Verbraucher/BeschwerdenStreitschlichtung/BeiBaFinbeschwerden/BeiBaFinbeschwerden\\_node\\_en.html](https://www.bafin.de/EN/Verbraucher/BeschwerdenStreitschlichtung/BeiBaFinbeschwerden/BeiBaFinbeschwerden_node_en.html)
- Besides this you also always have the option to bring your dispute directly to the civil courts in charge.

#### In the Netherlands:

- Is your complaint about a financial product or a financial service? Then you can submit your complaint to the Financial Services Complaints Institute (KIFID) via [www.KIFID.nl](http://www.KIFID.nl) or by telephone (0900) 355 2248 (0900-FKLACHT). The deadline for submitting a complaint to the KIFID can be found on the KIFID website.

#### Civil Courts

- Besides this you also always have the option to bring your dispute directly to the civil courts in charge.

### 7. Updating Procedures

No process stays the same and change is inevitable, therefore it is important that this Procedure be reviewed on an annual base and updated when appropriate.