

## Remuneration Policy - VanEck Asset Management B.V. (the “Manager”)

### Compliance with statutory requirements

The UCITS Directives require that management companies have a remuneration policy for employees whose professional activities have a material impact on the risk profile of the Sub-funds (the “Identified Staff”).

The Manager must comply with the remuneration policy principles which apply for UCITS in a manner appropriate to the size of the Manager and of the managed Sub-funds, the Manager’s internal organisation and the nature, scope and complexity of its activities.

The Manager based its determination of the remuneration policy on the following aspects:

- the Company’s assets under management amounted to EUR 5,503 million on 31 December 2021;
- the vast majority of managed Sub-funds are UCITS ETFs and pursue a passive investment policy as described in the relevant prospectus. The portfolio management for the active funds managed by the Company is delegated to investment managers. On account of the mainly passive character of the investment policy of the Sub-funds managed, the management activities are regarded as not complex;
- there are no securities loans; and
- during 2021, an average of 16 employees including the Board of Directors were employed by the Manager on the basis of full employment; and
- the Manager has no branches or subsidiaries.

Taking into account the size, internal organisational structure, scope and complexity of the activities, the Supervisory Board decided that it is not necessary to fully apply all the requirements for the payment of variable remuneration. An important element for this decision was the passive nature of the majority of managed Sub-funds and the (extremely) limited discretion in relation to investment decisions, the related risk exposure of all the Sub-funds and the small number of employees at present. The Supervisory Board is currently convinced that the present remuneration policy is reconcilable with the risk profile, risk appetite and strategy of the Manager and of the managed Sub-funds.

### Remuneration structure

The Manager’s investment policy is in accordance with and conducive to healthy and effective risk management and does not encourage risk taking. The policy is also in line with the corporate strategy, objectives, values and interests of the Manager, the Sub-funds and their investors and includes measures to prevent conflicts of interest.

The remuneration policy adheres to the following elements in relation to the remuneration that applies for Identified Staff:

#### Fixed remuneration:

Fixed remuneration is proportionate to the level of responsibility, the skills and professional experience of the employee.

#### Variable remuneration:

Variable remuneration is proportionate to the performance of the employee and is linked to risk-adjusted performance. The remuneration structure does not encourage excessive risk-taking with respect to risks including sustainability risks and promotes adherence to conduct rules, guidelines and risk policies including sustainability risk guidelines.

At least 50% of a variable remuneration component granted to a member of Identified Staff will be granted in shares of a selection from the managed Sub-funds as determined by the Manager, with the approval of the relevant legal entity (the ‘Instruments’), taking into account the value of such Instruments on the date of granting as stipulated by the Manager, with the approval of the relevant legal entity, where the person is not entitled to fractions of shares (the number of shares will be rounded down if necessary). If the Sub-funds to be managed represent less than 50% of the total portfolio managed by the Manager, the minimum of 50% does not apply.

At least 40% of the variable remuneration component is paid out deferred over a period in keeping with the holding period advised to investors in the relevant Sub-fund and correctly attuned to the nature of the risks of the Sub-fund in question. The period referred to in this point must be at least three years. The remuneration that must be paid on account of the deferral regulations does not fall due longer than on a prorated basis. In the event of a variable remuneration component of an especially high amount, at least 60% of the amount is deferred.

Identified Staff are not entitled to dividends or interest in relation to the Instruments before such Instruments have been unconditionally granted.

As concerns the portion of the variable remuneration that is granted in Instruments, a lock-up period of one year applies after the unconditional granting, during which the individual is prohibited from trading, transferring, disposing of or encumbering the Instrument, in the broadest sense (this also applies for dividends in Instruments that are paid out in relation to the Instruments for which a lock-up period applies).

The Board of Directors of VanEck Asset Management B.V. qualifies as "Identified Staff". Within VanEck Asset Management B.V. there are no employees who receive more remuneration than the Board of Directors.

In 2020 the members of the Board of Directors and the other staff received a variable remuneration next to the fixed remuneration. The variable remuneration with regards to the Identified Staff are paid out as follows:

- 40% directly
- 20% after 1 year
- 20% after 2 years
- Remaining 20% after 3 years

The summary of remuneration for the 2021 financial year can be found in the annual report of the Manager on [www.vaneck.com](http://www.vaneck.com).