

VANECK ICAV

An umbrella fund with segregated liability between sub-funds and authorised by the Central Bank of Ireland (the “Fund”)

Application form

Please complete this application form (the “Application Form”) in capital letters, date it and send it first by fax then by post, together with all relevant documentation requested under section 2, 3, 10 and/or 11, to the following address:

Administrator

State Street Fund Services (Ireland) Limited
Attention: Transfer Agency Department
78 Sir John Rogerson's Quay
Dublin 2
Ireland

Fax number: **+353 1 562 5515**

This Application Form should be read in conjunction with the most recent prospectus of the Fund (the “Prospectus”), including any Supplement and the relevant key investor information documents (KIID(s)) relating to the sub-funds of the Fund (individually a “Sub-Fund” and collectively the “Sub-Funds”).

Capitalized terms used herein without definition shall have the same meanings assigned to them in the Prospectus, unless otherwise stated.

(It is suggested that the applicant completes this Application Form in duplicate, retaining one copy for his/her own records.)

Instructions

For initial subscriptions for units you must complete the Application Form and post it to the address above. Completed Application Forms may also be sent by fax with the original Forms and the supporting documentation required for Anti-Money Laundering purposes to follow by post immediately thereafter.

Failure to provide the original Application Form along with the documentation required for Anti-Money Laundering purposes may result in the deduction of tax due to the Irish Finance Act requirements outlined in the Anti-Money Laundering section and/or a delay in the acceptance and/or payment of a transfer/redemption request.

Subsequent subscriptions may be made in writing or by facsimile, stating your registration details and the amount to be invested.

Non Retail Accounts - an authorised signatory list must be provided at the time of account opening for the investing entity in whose name the account is being opened. The Application Form must be signed in accordance with the signing mandate outlined in the authorised signatory list.

Any future changes to the original account details must be received in original format and signed in accordance with the signing mandate outlined in the authorised signatory list, in the case of a company, on corporate letterhead, and in the case of retail applicants, all account signatories must authorise every instruction.

1. ACCOUNT REGISTRATION DETAILS

If you are an existing shareholder/unit holder please provide us with your account number (if known):

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A. INDIVIDUAL INVESTOR

1st Account Holder

Title							
Last name/Family name							
First name(s)/Given name(s)							
Gender				<input type="checkbox"/> M		<input type="checkbox"/> F	
Date of birth		d	d	m	m	y	y
Place of birth (city & country)							
Nationality/nationalities							
Professional activity <i>(Please specify position and domain of activity /employer, if retired please specify previous position and domain of activity/employer)</i>							
If you hold or have held any political or public function, or if you are an immediate relative of a person that holds or has held any political or public function, please tick this box <input type="checkbox"/>							
Source of funds invested							
<input type="checkbox"/> Inheritance		<input type="checkbox"/> Gift		<input type="checkbox"/> Sale of Business			
<input type="checkbox"/> Savings		<input type="checkbox"/> Pension		<input type="checkbox"/> Investment income			
<input type="checkbox"/> Sale of assets (please specify)							
<input type="checkbox"/> Other (please specify)							
<i>Further supporting documentation may be requested if deemed necessary to verify the above information.</i>							
Tax ID number (if available)							
Passport/National ID number							
Country of residence for tax purposes							
Address, city & country (no PO Box allowed)							
Telephone							
Fax							
Email							

2nd Account Holder

Title							
Last name/Family name							
First name(s)/Given name(s)							
Gender				<input type="checkbox"/> M		<input type="checkbox"/> F	
Date of birth		d	d	m	m	y	y
Place of birth (city & country)							
Nationality/nationalities							
Professional activity <i>(Please specify position and domain of activity /employer, if retired please specify previous position and domain of activity/employer)</i>							
If you hold or have held any political or public function, or if you are an immediate relative of a person that holds or has held any political or public function, please tick this box <input type="checkbox"/>							
Source of funds invested							
<input type="checkbox"/> Inheritance		<input type="checkbox"/> Gift		<input type="checkbox"/> Sale of Business			
<input type="checkbox"/> Savings		<input type="checkbox"/> Pension		<input type="checkbox"/> Investment income			
<input type="checkbox"/> Sale of assets (please specify)							
<input type="checkbox"/> Other (please specify)							
<i>Further supporting documentation may be requested if deemed necessary to verify the above information.</i>							
Tax ID number (if available)							
Passport/National ID number							
Country of residence for tax purposes							
Address, city & country (no PO Box allowed)							
Telephone							
Fax							
Email							

For additional account holder(s), please complete Addendum A.

B. CORPORATE INVESTOR

Full Company Name	
Designation (if any)	
Date of Incorporation	
Type of Company <input type="checkbox"/> Corporation <input type="checkbox"/> Insurance <input type="checkbox"/> Broker <input type="checkbox"/> Financial Institution <input type="checkbox"/> Other (please specify)	
Regulated in a country with requirements of anti-money laundering and counter-terrorism financing (AML-CTF) regulations equivalent to those in force within Ireland <input type="checkbox"/> no <input type="checkbox"/> yes, by	
Listed on a recognized stock exchange (which country applies AML-CTF regulations equivalent to those in force within Ireland) <input type="checkbox"/> no <input type="checkbox"/> yes, by	
Tax identification number (if applicable)	
RCS number (if applicable)	
Country of residence for tax purposes (if applicable)	
Intermediary / Underlying client	
VanEck ICAV sales representative	

Registered Address

Address (no PO Box allowed)	
Telephone	
Fax	
Email	
Internet site	

Mailing Address & Contact

Address	
Contact person for daily business	
Title	
Name	
Telephone	
Fax	
Email	

I/We confirm that the information set out here above comprises our complete address as well as contact details information references for the purpose of inclusion thereof in the register of shareholders. I/We confirm that the Fund may treat such information as accurate and up to date until notice to the contrary shall have been received in writing by it from us.

C. FATCA

In the context of FATCA (applicable July 1st 2014) please provide the following information:

GIIN – Global Intermediary Identification Number (if applicable):

IRS or FATCA Entity Classification (if applicable):

Please tick the “Yes” box if one of the below US Indicia apply (and provide the relevant information), if not go to section 2.

Yes

No

US Indicia:

A current U.S. residence address or U.S. mailing address (including a U.S. post office box):

A current U.S. telephone number (regardless of whether such number is the only telephone number associated with the account holder:

Standing instructions to pay amounts from the account to an account maintained in the United States:

A current power of attorney or signatory authority granted to a person with a U.S. address:

An “in-care-of” address or a “hold mail” address that is the sole address the FFI has identified for the account holder:

.....

If you ticked “No” on the question above:

Please attach to this application form the filled out W8-BEN-E form that can be found on the IRS website:
<http://www.irs.gov/pub/irs-pdf/fw8bene.pdf>

IMPORTANT: In case of change of the above please inform the Fund or the Administrator immediately

D. CRS

In order to comply with the Organization for Economic and Co-operation and Development (OECD) Common Reporting Standards (CRS) regulations as well as related FATCA regulations, all Subscribers, whether individuals or entities and the controlling persons of such entities, are required to complete the applicable Self-Certification Form attached hereto.

IMPORTANT: Application Form will be rejected without the completion and submission of the applicable Self-Certification Form attached to the back of this Application Form

2. THE INVESTMENT IS MADE

Please tick one of the following boxes to confirm whether you invest for your own account or on behalf of another person

On my/our own behalf	
On behalf of a third party <i>(if investing on behalf of a third party, please complete hereinafter section 2.1 with the appropriate details)</i>	
On behalf of several non-disclosed Third Parties (omnibus/pooled accounts) (please tick the box if applicable and, please complete hereinafter section 2.1 with the appropriate details)	
<ul style="list-style-type: none"> - Intermediary from EU, EEA , EU Common Understanding List (July 2012) will need to provide under Enhanced Due Diligence additional information to the basic KYC standard: <ul style="list-style-type: none"> o Information on the nature of the intermediary’s business o Provide insight into AML/CTF policies (sharing of Policies or completing Wolfsberg/Fund Due Diligence Questionnaire) - Intermediary from Non-Equivalent countries will only be accepted under following Enhanced Due Diligence standards that need to be provided by the Fund/Management Company in addition to KYC on the intermediary: <ul style="list-style-type: none"> o Information on the nature of the intermediary’s business o Provide insight into AML/CTF policies (sharing of Policies or completing Wolfsberg/Fund Due Diligence Questionnaire) o Clearly understand the respective responsibilities of the Intermediary (Distribution Agreement) and obtain written confirmation from the Management Company/Fund on the successful performance of Due Diligence on the Intermediary 	

2.1. Ultimate Economic Beneficiary Declaration

(If the investor is a regulated financial institution in a country with AML-CTF laws and regulations equivalent to those in force within Ireland or covered by a KYC/AML comfort letter from a parent company that is a financial institution regulated in a country with AML-CTF laws and regulations equivalent to those in force within Ireland, please proceed to the next section).

An ultimate economic beneficiary is the final beneficiary of the investment and who owns, directly or indirectly, more than 25% of the value of the shares/units subscribed.

Important: In case of indirect ownership, please describe on a dated and signed chart all the intermediate levels of ownership with names and percentages.

I/we declare that the final beneficiary of my/our investment is:

Last name/ Family name													
First name(s)/ Given name(s)													
Entity Type*													
Address													
Date of birth	d		d		m		m		y		y		y

Please enclose a certified true copy of the ID of the above-referenced individual.

If you invest on behalf of more than one ultimate economic beneficiary, please indicate his/her/their full details on a separate sheet and send the related certified ID(s) along with this Application Form.

*: e.g. (i) individual (ii) joint account, (iii) publicly-listed company, (iv) state-owned entity, (v) pension fund, (vi) regulated credit and financial institution, (vii) nominee company / intermediary company, (viii) private and unlisted companies, (ix) partnerships, (x) collective investment schemes, (xi) trusts, foundations and similar entities, (xii) charities, (xiii) clubs & societies, (xiv) places of worship, (xv) other (please specify)

3. IF YOU ARE APPLYING VIA A FINANCIAL ADVISOR/DEALER

If you invest through a financial advisor or dealer, please have such financial advisor or dealer complete and sign the below section accordingly.

If you are applying directly, please skip this section and go to section 4.

a) I/We acknowledge that, in order to enable the Fund to implement, as the case may be, internal anti-money laundering (“AML”) procedures and/or to enable the Administrator to comply with its obligations to identify subscribers, we have to provide the Administrator with any and all information, confirmations or statements from us, that the Administrator deems necessary to ensure for compliance with Irish laws on the prevention of money laundering, and in particular the law of 12 November 2004 regarding the fight against money laundering and any other law or regulation issued by the Irish government or supervisory authorities. To this end, the Fund and/or the Administrator may demand details concerning the financial institutions from which the transfer of payment is to be made.	
b) I/We further declare that the documentary evidence to support the identification is held by me/us and can be produced on demand. In particular, I/ we have been provided with the current version of the Prospectus, including any supplement, annual report or semi-annual report (where available) and the latest version of the relevant KIIDs, as the case may be and with accurate and comprehensive information as to the risks entailed with an investment in the Fund.	
Name of financial advisor/dealer	
Stamp (containing registered address of financial advisor/ dealer)	
Name of regulatory body (if any)	
Country of regulatory body	
Signature of financial advisor/dealer	
Date	

IMPORTANT NOTE TO THE ATTENTION OF THE FINANCIAL ADVISOR/DEALER:*

In order to act as intermediary for the Fund, please contact the Management Company and ensure you sign a dealer/intermediary agreement with the Fund accordingly.

In addition, please send together with this application form and related documentation for the shareholder the following documents for your entity/company:

- *an original self-certified authorized signatories list with signature specimen stating who will operate the account, current and dated on company letterhead, not more than one year old*
- *a proof of regulation by a competent national supervisory authority*

** Please note that the Fund, the Management Company and/or the Administrator reserve the right to ask for complementary identification documents upon receipt of the above documentation*

4. VALUATION DAY (TRADE DATE)

Please indicate below the valuation day you would like to apply to your investment.

Applications accepted prior to or on the applicable Cut-Off Time for a particular Dealing Day will be processed as of that Dealing Day.

Note: Acceptance of Applications received after the Cut-Off Time as specified in the relevant Supplement for a Sub-Fund for a particular Dealing Day will be deferred until the next Dealing Day.

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5. INVESTMENT DETAILS

Please enter your investment details below.

Note: Minimum holdings in any Class and/or Sub-Fund are as set out in the current version of the Prospectus.

Sub-fund name(s)	Class	Currency	Amount	Shares
VANECK – GLOBAL RESOURCES UCITS				
VANECK – EMERGING MARKETS BOND UCITS				
VANECK – EMERGING MARKETS EQUITY UCITS				

Should you have any questions, please contact the Transfer Agent, State Street Fund Services Ireland Limited, 78 Sir John Rogersons Quay, Dublin 2, Ireland. Telephone: + 353 1 242 5445 Facsimile: + 353 1 562 5515 Email: VanEckTA@statestreet.com

6. DIVIDENDS

Dividends, if declared, will be reinvested automatically in additional shares of the same class of the relevant Sub-Funds unless you indicate otherwise by ticking this box:

If dividend payments are requested, they will be credited directly to your bank account. Please ensure you have completed your bank details in section 8.

If you wish to receive dividend payments on a different bank account, please indicate your complete dividend banking details on a separate page and sign those accordingly.

7. THE PAYMENT OF INVESTMENT

(Please use the following banking details to pay out your subscription)

The subscription price in the relevant Reference Currency of the relevant Sub-Fund or Class will be paid in favor of VanEck ICAV on behalf of the relevant Sub-Fund(s) to*:

Please ensure to select the correct reference on the following pages

	USD	EURO	SEK
Beneficiary Bank Name	Bank of America N.A. New York	Bank of America N.A. London	Skandinaviska Enskilda Banken
Beneficiary BIC/SWIFT	BOFAUS3N	BOFAGB22	ESSESESS
Beneficiary Account number	6550663085	GB26 BOFA 1650 5078 3170 15	SE675000000005815102191 8
For Credit to	VanEck ICAV	VanEck ICAV	BofA re: VanEck ICAV
Reference	<p>VANECK – GLOBAL RESOURCES UCITS</p> <ul style="list-style-type: none"> - USD R1 Acc <input type="checkbox"/> - USD I1 Acc <input type="checkbox"/> <p>VANECK – EMERGING MARKETS BOND UCITS</p> <ul style="list-style-type: none"> - USD R1 Inc <input type="checkbox"/> - USD I1 Inc <input type="checkbox"/> - USD I2 Inc <input type="checkbox"/> - USD M Inc <input type="checkbox"/> <p>VANECK - EMERGING MARKETS EQUITY UCITS</p> <ul style="list-style-type: none"> - USD R1 Acc <input type="checkbox"/> - USD I1 Acc <input type="checkbox"/> - USD I2 Acc <input type="checkbox"/> - USD M Acc <input type="checkbox"/> 	<p>VanEck ICAV on behalf of:</p> <p>VANECK –EMERGING MARKETS BOND UCITS</p> <ul style="list-style-type: none"> - EUR Hedge I1 Inc <input type="checkbox"/> 	<p>VanEck ICAV on behalf of:</p> <p>VANECK – EMERGING MARKETS EQUITY UCITS</p> <ul style="list-style-type: none"> - SEK R2 Acc <input type="checkbox"/>

*Additional share classes available upon request

8. Remitting bank details (Please indicate where the money will be wired from)

The subscription payment **MUST** come from a bank account in the name of the registered shareholder/unit holder account only. The subscription payment must be received by the Administrator for value date at the payment date as determined in the relevant supplement to the Prospectus

As per bank account details for redemptions section (section 9) stated below

OR please complete the details below*

Bank Name	
Bank Address	
BIC / SWIFT	
Account Name	
Account Number	

*If you have more than one remitting bank please provide details on a separate sheet.

9. REDEMPTION PAYMENT

(Please indicate where you wish to receive the proceeds of your redemption)

Please note that all payments will be made by default in the name of the registered shareholder/unit holder only, no third party payment will be effected. Any omission or inaccuracy in the completion of these details for redemption request could result in late or non-payment of the redemption proceeds. In case of a discrepancy between any payment details mentioned in any payment instructions and the banking details stated here below, the Administrator and/or the Fund reserve the right to suspend the payment until the shareholder provides any of them with evidence that the shareholder registered in the register of shareholders is the beneficiary of the account.

Correspondent Bank Name	
Correspondent Bank Address	
Correspondent Bank Sort Code/ SWIFT (BIC)/ ABA/Fedwire	
Beneficiary Bank Name	
Beneficiary Bank Address	
Payment Type (please select) Default is MT103 for individuals and MT202 for bank to bank payment	MT202 <input type="checkbox"/> / MT103 <input type="checkbox"/>
Beneficiary BIC / SWIFT	
Beneficiary Account Name	
Beneficiary Account Number	
IBAN	
Reference	

Both IBANS & SWIFT (BIC) Codes should be quoted for all banks within the EU/EEA.

Amendments to investors' payment instructions will only be effected upon receipt of an original instruction which has been duly authorised. In the case of joint accounts, instructions will only be made upon receipt of instruction duly signed by all applicants.

The Administrator does not accept any responsibility for the bank account details quoted and any payments made using these details will be at your risk.

Return of Values (Investment Undertakings) Regulations 2013

Pursuant to the Return of Values (Investment Undertakings) Regulations 2013 (S.I. 245 of 2013) (the "Regulations"), the Company is required to collect certain information from non-Excepted Share Holders. All Applicants, whether individuals, bodies corporate or unincorporated bodies of persons, which are Irish resident or ordinarily resident should review the list of Excepted Share Holders set out below.

If the Applicant is Irish resident or non-Irish resident and is not an Excepted Share Holder, please provide the following information and documentations:

Tax Identification Number (TIN) / PPS Number: _____

Any one of the following additional documents is required to verify the TIN or PPS Number (either an original or a copy will suffice):

- P60
- P45
- P21 Balancing Statement
- Payslip (where employer is identified by name or tax number)
- Drug Payment Scheme Card
- Tax Assessment
- Tax Return Form
- PAYE Notice of Tax Credits
- Child Benefit Award Letter / Book
- Pension book
- Social Services Card
- Public Services Card

In addition, printed documentation issued by the Irish Revenue Commissioners or the Department of Social Protection which includes your name, address and tax reference number is also acceptable.

In the case of joint account holders, the additional documentation is required for each Applicant.

Your personal information will be handled by the Administrator, the Company or its duly appointed delegates as Data Processor for the Company in accordance with the Irish data protection legislation which shall include for the avoidance of doubt, the EU Data Protection Directive 95/46/EC and Data Protection Acts 1988 and 2003 in Ireland (as amended or replaced) (together the DPA), (ii) to the extent applicable the data protection and information privacy laws of another jurisdiction and (iii) any subsequent re-enactment, replacement or amendment of such laws or the DPA, and including, for the avoidance of doubt, the General Data Protection Regulation (EU) 2016/679 (the GDPR) and any law implementing the GDPR to the extent applicable) and any guidance issued by the Irish Data Protection Commissioner. Information provided herein will be processed for the purposes of complying with the Regulations and this may include disclosure to the Irish Revenue Commissioners.

Excepted Share Holders	
Share Holders	TCA 1997 reference
The following entities will constitute Excepted Share Holders provided the Fund has obtained a duly completed appropriate declaration:	
An investment undertaking	739D(6)(c)
An investment limited partnership	739D(6)(cc)
A pension scheme which is an exempt approved scheme	739D(6)a)
A company carrying on a life assurance business	739D(6)(b)
A special investment scheme	739D(6)(d)
A unit trust to which section 731(5) applies	739D(6)(e)
A charity	739D(6)(f)(i)
ARFs, AMRFs	739D(6)(h)
A qualifying fund manager	739D(6)(g)
A qualifying savings manager	739D(6)(g)
PRSA providers	739D(6)(i)
The National Pensions Reserve Fund	739D(6)(l)
The National Asset Management Agency	739D(6)(ka)
A Section 110 Company	739D(6)m)
A Credit Union	739D(6)(j)
An Irish resident company but only where the Fund is a money market fund	739D(6)(k)

A non-Irish resident unit holder in respect of whom the Fund has obtained a completed non-resident declaration or where the Fund has adopted the Equivalent Measures Regime	739D(7) 739D(7B)
A unit holder who holds their units in a recognised clearing system	739B

10. IDENTIFICATION FOR INDIVIDUAL INVESTORS

10.1 Anti-Money Laundering – Know Your Customer Requirements

Under Irish legislation and supplemental Guidance covering anti-money laundering and the taxation of savings the Fund and the Administrator are required to obtain the following documentation to verify the identity of all new applicants. This documentation should be provided with the application form. The documentation listed below may not cover all applications and the Fund and the Administrator reserve the right to request additional documentation if required.

Should documents be provided in a language other than English, an English translation may be required.

Please note that the application may not be accepted until the Administrator is in receipt of all required anti-money laundering documentation, the original Application Form and the original banking details for the settlement of the redemption proceeds. In any event, redemption and dividend payments will not be processed until full anti-money laundering documentation has been received on the account and the Fund and the Administrator reserve the right to take further action where full anti-money laundering documentation has not been received.

Documentation which may be required for all Retail Applicants

1. Personal Verification¹ - ONE official photographic document (Certified²)
2. Address Verification³ - TWO different address verification documents (Original or Certified)

Documentation which may be required for Designated Bodies in certain Countries⁴

1. Confirmation of Name and Address
2. Confirmation of Regulatory Body
3. Original Authorised Signatory List
4. Original Letter of Assurance (where investing as an intermediary)

Documentation which may be required for Non Designated Bodies

1. Confirmation of name, office address, principal business address and registered number
2. Confirmation of Regulatory Body (if applicable)
3. Certificate of Incorporation or Certificate to Trade (Certified)
4. Memorandum and Articles of Association (Certified)
5. Latest audited Financial Statements (Certified)
6. Nature and purpose of the entity
7. List of Directors to include full name, dates of birth, occupation, residential and business addresses
8. Authorised Mandate or Board Resolution to establish the business relationship
9. Original Authorised Signatory List
10. ONE personal verification and TWO address verification documents for at least TWO directors **OR** ONE director and ONE authorised signatory (original or certified)
11. Verify the identity of all beneficial owners beneficially entitled to more than 25% of the entity's share capital or voting rights or otherwise exercises control over the management of the entity (if no beneficial owner holds more than 25%, verification of this is required (eg share register))

Documentation which may be required for Pension Fund Accounts in certain Countries

1. Confirmation of name and address
2. Pension Scheme Rules
3. Constitutional / Formation Document (e.g.: Trust Deed)
4. Confirmation of registration from the relevant tax authorities or Pensions Board
5. Verification of the principal employer (if applicable)
6. Name, address and dates of birth of the officers/board members/trustees/directors/governors or equivalent
7. Identity verification for TWO officers/board members/trustees/directors/governors or equivalent

¹ Acceptable Personal Verification documents are a certified copy of a Passport or a Driver's License or National Identity Card. The certified documents must be in date, show a picture of the person, full name, date of birth and signature of the person.

² Verification documents must be *certified* by a suitable person/entity, such as; the Companies Registration Office (or the equivalent in the investors jurisdiction) with regard to incorporation documentation, a notary public, a police officer, an embassy/consular official, a chartered or certified public accountant, a practicing solicitor, any Designated Body. Documents should be stamped with the official stamp of the person, dated and signed by that person.

³ Acceptable Address Verification documents are any TWO of the following: electricity bill, gas bill, water bill, telephone bill, cable television bill, bank statement or credit card statement, social insurance documents, household/motor insurance certificates. Documents must originate from a different source, show the full name and residential address of the applicant and must be dated within 6 months of submission.

⁴ Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Guernsey, Hong Kong, Iceland, Ireland, Italy, Jersey, Luxembourg, Isle of Man, Netherlands, Norway, Portugal, Singapore, Spain, Sweden, Switzerland, United Kingdom, United States (please note this list is subject to change).

8. Evidence that the person representing the Pension Scheme is empowered to act (Certified)
9. Original Authorised signatory list

Documentation which may be required for a Nominee Company

1. Confirmation of Name and Address of Nominee Company
2. Original Authorised Signatory List for the Nominee Account
3. Confirmation of Name and Address of Parent of Nominee
4. Confirmation of Regulatory Body of Parent of Nominee
5. Original Authorised Signatory List of Parent
6. Proof of regulation (nominee / parent)
7. Original Letter of Assurance from Parent

Documentation which may be required for a Trust/Foundation/Charity

1. Confirmation of name, registered & principal business address
2. Evidence of charitable status (if applicable)
3. Constitutional / Formation document (e.g.: Trust Deed or equivalent)
4. Nature and purpose
5. ONE Personal Verification and TWO Address Verification documents for at least TWO trustees/directors/governors/board members or ONE trustee/director/governor/board member and ONE authorised signatory (original / certified)
6. ONE Personal Verification and TWO Address Verification documents for any settler (where appropriate)
7. ONE Personal Verification and TWO Address Verification documents for all beneficiaries who own at least 25% of the capital
8. Original Authorised Signatory List

Please note that the Administrator can only accept Application Forms from an entity that has legal capacity to enter into contracts on its own right and may require the constitutive document to legitimate legal status.

10.2 AML Confirmation for Nominees/Intermediaries

This confirmation can only be completed by designated bodies regulated for anti-money laundering purposes by the appropriate regulator in one of the following countries: Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Guernsey, Hong Kong, Iceland, Ireland, Italy, Jersey, Luxembourg, Isle of Man, Netherlands, Norway, Portugal, Singapore, Spain, Sweden, Switzerland, United Kingdom, United States (please note this list is subject to change).

DESCRIPTION OF INVESTOR	DESIGNATED BODY INVESTING AS AN INTERMEDIARY <input type="checkbox"/>
	NOMINEE COMPANY <input type="checkbox"/>
RELATIONSHIP OF CONFIRMATION PROVIDER (REGULATED ENTITY) TO INVESTOR	INVESTOR <input type="checkbox"/>
	PARENT OF INVESTOR <input type="checkbox"/>

UNLESS THE FOLLOWING BOX IS TICKED THE ADMINISTRATOR WILL APPLY THE BELOW CONFIRMATION TO ANY SUBSEQUENT DESIGNATED ACCOUNTS IN THE NAME OF THIS INVESTOR.

DO NOT APPLY THE BELOW CONFIRMATION TO SUBSEQUENT DESIGNATIONS

Name of Regulated Entity _____
 Name of Regulator _____
 Address of Regulated Entity _____

We confirm that we are a designated body regulated for anti-money laundering purposes by the below regulator and hereby confirm the following in connection to the investor

1. We / the investor* has performed the anti-money laundering and counter-terrorist financing identification for any parties on whose behalf the investor is purchasing shares ("underlying investors").
2. The evidence we / the investor* has obtained to verify the identity of the underlying investors, and where appropriate, their beneficial shareholders, meets the requirements of our national anti-money laundering and counter-terrorist financing legislation and regulations.

- 3 We confirm that all documents and information, which we / the investor* may have on our / the investor's* files relating to the identity of each underlying investor will be sent to a competent authority as soon as practicable upon the competent authority's request.
- 4 We confirm that all documents and information, which we / the investor* may have on our / the investor's files relating to the identity of each underlying investor will be sent to the Administrator of the Fund as soon as practicable upon its request, subject to applicable rules and regulations.
- 5 We / the investor* will retain these documents and information for a period of at least 5 years after the relationship with an underlying investor has ended.
- 6 We / the investor* will take measures to ensure that the underlying investors are neither individuals nor institutions against whom sanctions have been imposed by the EU or United Nations or persons or entities that are included on the List of Specially Designated Nationals and Blocked Persons maintained by the U.S. Treasury's Department's Office of Foreign Asset Control ("OFAC").

Yours faithfully

Name: __ Title:

_____ Authorised Signatory of Regulated Entity.

This should be signed by an authorised member of the Compliance Department or Legal Department (please state position).

* delete as applicable

11. DECLARATION

By signing the Application Form and subscribing for Shares:

The undersigning declares that he/she/they are:

- over 18 years old and have full capacity to subscribe, to hold and to deal in shares
- any further application for shares shall be made or be deemed to be made in accordance with the then currently relevant documentation.
- that the money or assets invested are neither directly nor indirectly the proceeds of any criminal act within the meaning of the applicable anti-money laundering and counter terrorist financing regulations in Ireland.
- agree(s) to provide the necessary supporting identification documentation as requested by the Fund or the Administrator.
- agree(s) to furnish the Fund with any information, representations and forms as shall reasonably be requested by the Fund from time to time to assist it in complying with any applicable law or tax requirements or determining the extent of, and in fulfilling its withholding obligations. The Undersigned agrees to furnish the Fund with any representations and forms as shall reasonably be requested by the Fund to assist it in obtaining any exemption, reduction or refund of any withholding or other taxes imposed by any taxing authority or other governmental agency upon the Fund or amounts paid to the Fund.
- the information contained in this application form is correct at the time of completion and I/we hereby undertake to promptly inform the Fund and the Administrator of any change in my/our details contained herein.
- Where a Power of Attorney Form is required, a certified copy must be provided, and such Power of Attorney Form shall form an integral part of these Terms and Conditions.

I/We have accessed and/or been provided with, and has/have read and understood, the latest relevant version of the Key Investor Information Document ("KIID") on each occasion prior to investing, in accordance with EU Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 ("UCITS IV Directive") on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities ("UCITS"). By signing this Application Form, I/we acknowledge that *I/we have viewed, reviewed and understood the Key Investor Information Document (KIID) applicable to the relevant Share class(es) to which this Application Form relates in good time and prior to making an application for Shares of such Class(es). I/We hereby acknowledge and agree that the KIID can be accessed on www.vaneck.com/country and/or can be obtained free of charge from the Administrator.

I/We have read and am/are familiar with the current Prospectus and particularly the "Risk Considerations" set forth in such document, and the articles of association of the Fund (the "Articles"), the content of which I/we understand and accept;

I/we have not been furnished with and am/are not relying on any other offering literature relating to the Shares except the Prospectus, KIID and the Articles and (where relevant) the latest annual report or semi-annual report;

I/We have read Section "Taxation" in the Prospectus describing the consequences of an investment in Fund and hereby acknowledge and understand that this information is general in nature and not intended as tax advice to me/us. I/We hereby acknowledge and certify that the actual tax consequences to us of an investment in the Fund will depend on our individual circumstances; accordingly I/we understand that I/we should seek our own tax advice;

I/We have been afforded the opportunity (A) to ask such questions as I/we have deemed necessary of, and to receive answers from, representatives of the Fund concerning the terms and conditions of the offering of the Shares and the merits and risks investing in the Shares, and (B) to obtain such additional information that the Fund possesses or can acquire without unreasonable effort or expense that is necessary to verify the accuracy and completeness of the information contained in the Prospectus;

(if investor thereunder is not a natural person)I/We also represent and warrant that: (i) I/we am/are duly organised, validly existing and in good standing under the laws of the jurisdiction in which I/we was/were formed; (ii) I/we have all requisite power and authority to invest in Shares of the Fund, as provided herein; (iii) such investment will not result in any material violation of or conflict with (x) any term of the charter or by-laws applicable to us or any other organisational document or (y) any instrument by which I/we are bound or any law or regulation applicable to us; (iv) such investment has been duly authorised by all necessary action on our behalf; and (v) this Application Form has been duly executed and delivered on our behalf and constitutes our legal, valid and binding agreement enforceable against us in accordance with its terms, except as the enforcement thereof may be limited by bankruptcy, insolvency (including, without limitation, all laws relating to fraudulent transfers), reorganisation, moratorium or similar laws affecting enforcement of creditors' rights generally and except as enforcement thereof is subject to general principles of equity (regardless of whether enforcement is considered in a proceeding in equity or at law);

I/We confirm that all written information which I/we have provided to the Fund and/or the Administrator contained in this Application Form is correct and complete as of the date hereof and may be relied upon. Should there be any material change in such information prior to or following acceptance of this Application Form, I/we will immediately provide the Fund and/or the Administrator with notice of such change;

I/We confirm that the address listed herein is our official and principal or permanent address of residence or (if investor thereunder is not a natural person) our registered and principal place of business and the only jurisdiction in which an offer to sell any of the Shares was made to us. PO Boxes and c/o addresses are only allowed for correspondence purposes. Proof of official and permanent address of residence or official registered place of business registration can be requested.

In order to fully benefit from the shareholder services to be provided globally by the Investment Manager, Van Eck Associates Corporation ("VEAC") or, as the case may be, by another entity of the VanEck's group entrusted with the provision of such services, I/we hereby expressly agree to the Fund instructing the Administrator, to disclose any information that I/we have supplied on this Application Form as well as any information on my/our holdings in the Fund (which may include the following data: name, date of birth, home address, contact details, professional activity, nationality, telephone number, banking details, amount invested, holdings in the Fund), with immediate effect to VEAC whose principal office is at 666 Third Avenue – 9th Floor, New York, NY 10017, United States of America, respectively to any other entity of the VanEck's group that will be entrusted with the provision of services to the Fund's shareholders, the services of which I/we will benefit. I/We consider that these transfers of data occur in my/our interest as they will allow me/us to: (i) contact VEAC or such other entity to obtain more swiftly information about the Fund including any holdings I/we may have in the Fund; (ii) be able to follow more closely my/our account in the Fund over time; and (iii) contact VEAC or such other entity outside European business hours to obtain information about the Fund including any holdings I/we may have in the Fund. Consent in relation to such data transfers shall continue for as long as I/we hold Shares in the Fund, subject to legal retention periods.

I/we understand and am/are aware that:

- Subscriptions received by the Fund on the transaction date no later than the cut-off time stated in the Prospectus shall be treated at the issue price calculated on that same day.
- This contract will be legally binding when it is signed and the sums paid to the Fund are received.
- Correspondence will be sent to our correspondence address noted above unless otherwise notified by us in writing from time to time.
- If more than one investor applies, all investors must sign this application form.

In this case, please select one of the following options:

1) Joint Account

Each holder shall individually dispose of the assets in the joint account. In the case of death or incapacity of one of the investors, the surviving investor(s) may continue to freely dispose of the assets in the joint account, unless formal opposition to the contrary from the parties authorised to represent the deceased or incapacitated investor's estate has been received by the Administrator.

(In respect of joint shareholdings only). We direct that on the death of one of us, the Shares for which we hereby apply be held in the name of and to the order of the survivor (s) of us or the executor or administrator of such survivor(s)

Or

2) Collective Account

The investors shall only have the right to deal collectively in all matters concerning the collective account.

In case no box is ticked, option 2 will default.

- If the subscription is not for the benefit of the named shareowner of the account, the Administrator needs to be provided with the necessary "Know Your Customer" documentation for the economic beneficiary of the investment.

I/We hereby certify the identity of the beneficial owner of the subscription monies and of the Shares to be subscribed by the way of the present Application Form and that the monies invested in the Fund do not have a criminal origin, of whatsoever nature and in particular do not constitute the proceeds of money laundering or for terrorism financing.

Where I/we am/are investing as nominee, I/we shall provide our client(s) with the KIID issued in respect of the Fund and/or share class (as the case may be) and I/we shall ensure that we do so in compliance with Commission Regulation (EU) No. 583/2010, as amended from time to time or by any supplemental legislation and in compliance with the applicable legislation in any jurisdiction in carrying out this activity. I/We shall maintain records of my/our provision of the KIID to my/our clients and shall furnish such records to the Fund, or its delegates, upon request.

I/We understand that the Shares are not, and will not be, registered under the US Securities Act of 1933. I/We

certify that I/we:

- am/are NOT a United States Person (hereinafter a U.S. Person) (as such expression is defined in Appendix A of this Application Form) and that this application is not made for, or on behalf of a U.S. Person or a person who is deemed to be a U.S. Person under the U.S. Investment Company Act of 1940, as amended.
- will notify the Fund and the Administrator, immediately in the event that I/we become a U.S. Person or a person who is deemed to be a U.S. Person under the U.S. Investment Company Act of 1940, as amended.

I/We acknowledge that the Fund intends to take such steps as may be required to satisfy any obligations imposed by either (i) the FATCA compliance or deemed compliance (as the case may be) with the FATCA regulations or the IGA from 1 July 2014 or (iii) the Common Reporting Standard ("CRS") and any provisions imposed under Irish law arising out of its automatic exchange of information obligations

I/We shall provide the Fund and the Administrator with any additional information which it may reasonably request in connection with tax and/or Foreign Account Tax Compliance Act ("FATCA") regulations, (ii) any provisions imposed under Irish law arising from the IGA so as to ensure reporting requirements or other similar requirements in order to substantiate any representations made by me/us or otherwise and I/we authorize the Fund or its agents to disclose

such information relating to this application to such persons as they consider appropriate.

I/We acknowledge that, owing to anti-money laundering requirements operating within their respective jurisdictions, the Company, its Directors, the Transfer Agent, the Manager and any distributor which may be appointed (as the case may be) may require further identification of the applicant(s) before the application can be processed and the Company, its Directors, the Transfer Agent, the Manager and any distributor which may be appointed shall be held harmless and indemnified against any loss arising as a result of a failure to process the application if such information has been requested by the parties referred to and has not been provided by me/us.

I/We hereby authorise the Transfer Agent to accept and execute any instructions, (including but not limited to any instructions regarding subscriptions, switches, transfers or redemptions of Shares or any payment in relation to same or otherwise) in respect of Shares to which this application relates, given by me/us in written form, by facsimile, or by electronic means. I/We hereby agree to indemnify each of the Fund, Management Company, the Investment Manager, Depositary, Sub-Distributors and Administrator of the Fund and agree to of them indemnified against any loss of any nature whatsoever arising to any of them as a result of any of them acting upon instructions given in written form by me/us, i.e. facsimile, telephone instructions confirmed by me/us in writing. The Fund, Management Company, the Investment Manager, Depositary, Sub-Distributors and Administrator of the Fund may rely conclusively upon, and shall incur no liability in respect of, any action taken upon any notice, consent, request, instruction or other instrument believed in good faith to be genuine or to be signed by properly authorised persons.

I/We consent to any notice or other document to be sent by the Company or the Transfer Agent to me/us as a Shareholder, by electronic means including but not limited to e-mail, swift or posting such notice or other document on a website notified to me/us by post or by e-mail.

I/We agree to provide these representations to the Company and its Directors at such times as either of them may request and to provide on request such certifications, documents or other evidence as the Company and/or its Directors may reasonably require to substantiate such representations.

I/ We understand that the representations and warranties made herein are continuous and all subsequent subscriptions of Shares in the Fund by me/us shall be governed by them, and I/we agree to notify the Company or the Transfer Agent immediately, if any representation or warranty are no longer accurate and to abide by any directions from the Company or the Transfer Agent arising as a result.

I/We agree to provide to the Fund and/or the Administrator at such times as each of them may request such declarations, certificates or documents as each of them may reasonably require (the "Tax Information") in connection with this investment (including for the purposes of tax and/or FATCA regulations/reporting requirements). Should any information furnished to any of them become inaccurate or incomplete in any way, I/we hereby agree to notify the Fund or the Administrator immediately of any such change and further agree to request the redemption of Shares in respect of which such confirmations have become incomplete or inaccurate where requested to do so by the Fund.

In addition to any information required as part of the Tax Information, I/We agree to promptly provide, and periodically update, at any times requested by the Fund or the Administrator, any information (or verification thereof) the Fund or the Administrator deems necessary to comply with any requirement imposed by Sections 1471-1474 of the U.S. Internal Revenue Code of 1986, as amended (the "Code"), and any Treasury Regulations, forms, instructions, or other guidance issued pursuant thereto in order to reduce or eliminate FATCA withholding taxes. The information required to be provided by the preceding sentence may include, but shall not be limited to, (A) information the Fund or the Administrator deems necessary to determine whether the shareholder is a "foreign financial institution" ("FFI") as defined in Code § 1471(d)(4) or a "non-financial foreign entity" ("NFFE") as defined in Code § 1472(d), (B) if I/We am/are an FFI, any certification, statement or other information the Fund or the Administrator deems necessary to determine whether I/we meet the requirements of Code § 1471(b) (including entering into an agreement with the IRS pursuant to Code § 1471(b) (an "FFI Agreement") and complying with the terms thereof or, if the FFI is in a jurisdiction that has signed an intergovernmental agreement ("IGA") with the United States, complying with the terms of the IGA and any local laws or regulations implementing its terms) or is otherwise exempt from withholding required under Code § 1471, (C) if I/We am/are an FFI, including an FFI in a jurisdiction that has signed an IGA, a Global Intermediary Identification Number ("GIIN") assigned by the IRS; and (D) if I/We am/are an NFFE, any certification, statement or other information the Fund or the Administrator deems necessary to determine whether the shareholder meets the requirements of Code § 1472(b) (which information may be given to the U.S. Internal Revenue Service ("IRS") pursuant to Code § 1472(b)(3)) or is otherwise exempt from withholding required under Code § 1472.

I/We acknowledge for the purposes of complying with its automatic exchange of information obligations under the Common Reporting Standards (**CRS**) that the Fund is required to collect certain information on an account holder and on certain controlling persons in the case of the account holder being an entity (e.g. name, address, jurisdiction of residence, TIN, date and place of birth (as appropriate), the account number and the account balance or notice at the end of each calendar year) to identify accounts which are reportable to the Irish tax authorities under CRS and further acknowledge that such information may in turn be exchanged by the Irish tax authorities with other tax authorities. Further information in relation to CRS can be found on the AEOI webpage on www.revenue.ie.

I/We agree to provide to the Fund, the Investment Manager and the Administrator the necessary FATCA and CRS declarations, confirmations and/or classifications at such times as each of them may request and furthermore provide any supporting certificates or documents as each of them may reasonably require in connection with this investment by reason of the FATCA regulations, the IGA and any other applicable automatic exchange of information provisions (e.g. CRS), as described above, or otherwise. Should any information furnished to any of them become inaccurate or incomplete in any way, I/we hereby agree to notify the Fund, the Investment Manager and the Administrator immediately of any such change and further agree to immediately take such action as the Fund, the Investment Manager and the Administrator may direct, including where appropriate, redemption of our Shares in respect of which such confirmations have become incomplete or inaccurate where requested to do so by the Fund, the Investment Manager and the

Administrator (as applicable). If relevant, I/we agree to notify the Fund and the Administrator of any change to my/our tax residency status. I/we hereby also agree to indemnify and keep indemnified the Fund, the Investment Manager and the Administrator against any loss, liability, cost or expense (including without limitation legal fees, taxes and penalties) which may result directly or indirectly as a result of a failure to meet our obligations pursuant to this section or failure to provide such information which has been requested by the Fund, the Investment Manager and the Administrator and has not been provided by me/us, and from any misrepresentation or breach of any warranty, condition, covenant or agreement set forth herein or in any document delivered by me/us to the Fund, the Investment Manager and the Administrator. I/We further acknowledge that a failure to comply with the foregoing obligations or failure to provide the necessary information required may result in the compulsory redemption of our entire holding in the Fund, and that the Fund and the Custodian are authorized to hold back from redemption proceeds or other distributions to me/us such amount as is sufficient after the deduction of any redemption charges to discharge any such liability and I/we shall indemnify and keep indemnified the Fund and the Custodian against any loss suffered by them or other Shareholders in the Fund in connection with any obligation or liability to so deduct, withhold or account.

I/We hereby acknowledge that any notice or document may be served by the Fund or Administrator on me/us in the manner specified from time to time in the Prospectus and, for the purposes of the Electronic Commerce Act 2000, if I have provided an e-mail address or fax number to the Fund or its delegate, consent to any such notice or document being sent to me/us by fax or electronically to the fax number or e-mail address previously identified to the Fund or its delegate which I/we acknowledge constitutes effective receipt by me/us of the relevant notice or document. I/we acknowledge that I/we am/are not obliged to accept electronic communication and may at any time choose to revoke my/our agreement to receive communications by fax or electronically by notifying the Fund in writing at the above address, provided that my/our agreement to receive communications by fax or electronically shall remain in full force and effect pending receipt by the Fund of written notice of such revocation.

By providing the Tax Information, I/We represent and warrant the completeness and accuracy of such information (as at the date of submission) and authorize the Fund and/or the Administrator to act upon such information in good faith, including, but not limited to, disclosing or submitting such information to the Irish tax authorities. the Fund shall have no obligation to carry out any investigation with respect to the truth, accuracy or completeness of the Tax Information provided by us and I/We will, on demand, hold the Fund harmless from any liability resulting from my/our failure to provide complete and accurate Tax Information. I/We hereby acknowledge that if I/we fail to provide the Tax Information on a timely basis, I/We may be subject to 30% U.S. withholding tax on the investor's share of "withholdable payments" (as defined for purposes of FATCA) received by the Fund.

I/We hereby acknowledge that if I/we fail to provide the Tax Information and such failure results in the Fund and/or the Fund being unable to comply with the IGA, the Fund may exercise its right to completely redeem an applicant (at any time upon any or no notice). I/We further acknowledge and agree to indemnify the Fund and its other investors for any losses resulting from our failure to meet its obligations under this Section, including any U.S. withholding tax imposed on the Fund or the Fund.

12. PERSONAL DATA, PROCESSING AND DISCLOSING OF DATA

The following additional information only applies to natural persons:

I/We hereby acknowledge that I/we have received and read the Data Protection Notice set out in [Appendix B].

13. TRANSMISSION OF DOCUMENTS BY ELECTRONIC MEANS

By providing an e-mail address and signing this application form, I/we specifically choose and accept to receive/be provided with, prior to future subscriptions for shares in the Fund, copies of the latest KIID(s) for the relevant share class(es) that I/we will intend to subscribe for either by means of an electronic mail addressed to the email address indicated above in Section 1. "Registration Detail" or accessible free of charge on a website which address will be notified to me/us by means of electronic mail addressed to the email address indicated above in Section 1. "Registration Detail", instead of receiving such information on paper. For the avoidance of doubt, the right to request a paper copy of KIID(s) free of charge will remain unaffected.

14. Declaration of Residence Outside the Republic of Ireland

14.1 Declaration of Residence Outside the Republic of Ireland

Applicants resident outside the Republic of Ireland are required by the Irish Revenue Commissioners to make the following declaration which is in a format authorised by them, in order to receive payment without deduction of tax. It is important to note that this declaration, if it is then still correct, shall apply in respect of any subsequent acquisitions of shares/units.

Terms used in this declaration are defined in the Prospectus. Please select either A or B

A - Declaration on Own Behalf

- i. I/ We* declare that I am/we* are applying for the Units on my own/our own behalf/on behalf of a company* and that I am/we are/the company* is entitled to the Units in respect of which this declaration is made and that I am/we are/the company* is not currently an Irish Resident or Irish Ordinary Resident, and should I/we/the company* become an Irish Resident, I/we will so inform you, in writing, accordingly.

Delete* as appropriate

B - Declaration as Intermediary

- i. I/ We* declare that I am/we are* applying for Units on behalf of persons who will be beneficially entitled to the Units, and who to the best of my/our* knowledge and belief, are neither an Irish Resident or Irish Ordinary Resident, and
- ii. I/ we* also declare that unless I/we* specifically notify you to the contrary at the time of application, all applications for Units made by me/us* from the date of this application will be made on behalf of such persons; and I/we* will inform you in writing if I/we* become aware that any person, on whose behalf I/we* hold Units, becomes an Irish Resident.

Delete *as appropriate

14.2 Personal Portfolio Investment Undertaking (PPIU)

*I/We confirm that *I am/we are an Irish Resident or Irish Ordinary Resident who is a director or has a relationship with a director of the fund.

Please enter name(s) of PPIU _____

Delete * as appropriate

14.3 US Person Confirmation

Please complete EITHER SECTION A OR SECTION B as applicable

SECTION A: PLEASE TICK BOX AND DELETE AS APPLICABLE IF THE STATEMENT BELOW IS CORRECT

I/We confirm that I am/we are a US Person (as defined in the Prospectus) and am/are acquiring Shares in the Fund on behalf of, or for the benefit of, a US Person, OR I/we intend to transfer any Shares which I/we may purchase to any US Person.

PLEASE SUPPLY A COPY OF THE US INTERNAL REVENUE SERVICE FORM W-9 OR AN ORIGINAL W-8 BEN IF THE BENEFICIAL OWNER IS A NON-US PERSON.

SECTION B: PLEASE TICK BOX AND DELETE AS APPLICABLE IF THE STATEMENT BELOW IS CORRECT

I/We confirm that I am/we are not a US Person (as defined in the Prospectus) and am/are not acquiring Shares in the Fund on behalf of, or for the benefit of, a US Person, nor do I/we intend to transfer any Shares which I/we may purchase to any US Person

14.4 Politically Exposed Persons

Please complete EITHER Section A or B below, with reference to the definitions below

A Politically-Exposed Person” (“PEP”) is an individual who has at any time in the preceding 12 months been, entrusted with a prominent public function. This includes the following individuals (but excluding any middle ranking or more junior official):

- a. a “specified official”;
- b. a member of the administrative, management or supervisory body of a state-owned enterprise;

A “specified official” is (including any such officials in an institution of the European Communities or an international body):

- a. a head of state, head of government, government minister or deputy or assistant government minister;
- b. a member of a parliament;
- c. a member of a supreme court, constitutional court or other high level judicial body whose decisions, other than in exceptional circumstances, are not subject to further appeal;
- d. a member of a court of auditors or of the board of a central bank;
- e. an ambassador, chargé d’affaires or high-ranking officer in the armed forces

An immediate family member of a PEP includes any of the following persons:

- a. any spouse of the PEP;
- b. any person who is considered to be equivalent to a spouse of the PEP under the national or other law of the place where the person or PEP resides;
- c. any child of the PEP;
- d. any spouse of a child of the PEP;
- e. any person considered to be equivalent to a spouse of a child of the PEP under the national or other law of the place where the person or child resides;
- f. any parent of the PEP;
- g. any other family member of the PEP who is of a class prescribed by the Minister for Justice under section 37(11) of the Act.

A close associate of a PEP includes any of the following persons

- a. any individual who has joint beneficial ownership of a legal entity or legal arrangement, or any other close business relations, with the PEP;
- b. any individual who has sole beneficial ownership of a legal entity or legal arrangement set up for the actual benefit of the PEP.

As an example, a “beneficial owner” of a body corporate is any individual who (other than a company having securities listed on a regulated market):

- a. ultimately owns or controls, whether through direct or indirect ownership or control (including through bearer shareholdings), more than 25 per cent of the shares or voting rights of the body; or
- b. otherwise exercises control over the management of the body.

SECTION A: TO BE COMPLETED ONLY IF THE PEP RULES APPLY WITH REFERENCE TO THE ABOVE DEFINITIONS

the application is being made by a PEP / immediate family member of a PEP / close associate of a PEP

OR

the applicant has a beneficial owner who is a PEP / immediate family member of a PEP / close associate of a PEP

OR

the application is being made for the benefit of a PEP / immediate family member of a PEP / close associate of a PEP

OR

it is intended to transfer the shares to a PEP / immediate family member of a PEP / close associate of a PEP

Name of PEP		Address of PEP	
Office of PEP		Relationship of Applicant or Applicant’s Beneficial Owner to PEP	
Source of Wealth of the PEP (e.g. Income from employment, Income from company business, inheritance, etc.)			

SECTION B: PLEASE TICK BOX BELOW IF THE PEP RULES DO NOT APPLY WITH REFERENCE TO THE DEFINITIONS ABOVE:

I/we confirm that the application is NOT being made by a PEP / immediate family member of a PEP / close associate of a PEP

AND

the applicant does not have a beneficial owner who is a PEP / immediate family member of a PEP / close associate of a PEP

AND

the application is NOT being made for the benefit of a PEP / immediate family member of a PEP / close associate of a PEP

AND

it is NOT intended to transfer the shares to a PEP / immediate family member of a PEP / close associate of a PEP

SIGNATURES

I/We declare being duly authorized to sign the present Application Form and that I/we have received a copy of the Prospectus (and where relevant a current Annual or Semi-Annual Report) which I/we accept in full.

I/We further declare that all information contained in this application form is accurate to the best of my/our knowledge and belief.

This Application Form shall be governed by and construed in accordance with the laws of Ireland. The Applicant hereby irrevocably submits to the exclusive jurisdiction of the Courts of Ireland with regard to any claim or controversy under this Application Form, Prospectus, or investment in the Fund.

Location and date:

Investor's name	Signature
Investor's name	Signature

Important Information

Non-resident declarations are subject to inspection by the Irish Revenue Commissioners. It is a criminal offence to make a false declaration.

To be valid, this application form (incorporating the declaration required by the Irish Revenue Commissioners) must be signed by the applicant and in the case of joint applicants, each must sign. In the case of a corporation, the application must be signed by authorised signatories as agreed in the corporate signing mandate.

If the Application Form (incorporating the declaration required by the Irish Revenue Commissioners) is signed under power of attorney, a copy of the power of attorney must be furnished in support of the signature.

Applicants who are resident or ordinarily resident in the Republic of Ireland or are an Exempt Irish resident as defined in the Prospectus, please contact the Transfer agent immediately.

Individual (Controlling Person's) Self-Certification Form for FATCA and CRS

Instructions for completion

We are obliged under Section 891E, Section 891F and Section 891G of the Taxes Consolidation Act 1997 (as amended) and regulations made pursuant to those sections to collect certain information about each investor's tax arrangements. Please complete the sections below as directed and provide any additional information that is requested. Please note that in certain circumstances we may be legally obliged to share this information, and other financial information with respect to an investor's interests in the Fund with relevant tax authorities. This form is intended to request information only where such request is not prohibited by Irish law.

If you have any questions about this form or defining the investor's tax residency status, please refer to the OECD CRS Portal or speak to a tax adviser.

For further information on FATCA or CRS please refer to Irish Revenue website at <http://www.revenue.ie/en/business/aeoi/index.html> or the following link: <http://www.oecd.org/tax/automatic-exchange/> in the case of CRS only.

If any of the information below about the investor's tax residence or FATCA/CRS classification changes in the future, please ensure that we are advised of these changes promptly.

(Mandatory fields are marked with an *)

Investors that are individuals should not complete this form and should complete the form entitled "Individual Self-Certification for FATCA and CRS".

Sections 1, 2, 3 and 5 must be completed by all investors.

Section 4 should only be completed by any individual who is a Controlling Person of an entity investor which is a Passive Non-Financial Entity. For further guidance see.

<http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/common-reporting-standard-and-related-commentaries/#d.en.345314>

Section 1: Investor Identification (please refer to the glossary)

Investor Name*: _____

Current Residential Address*:

Number: _____ Street: _____

City, Town, State, Province or County: _____

Postal/ZIP Code: _____ Country: _____

Mailing address (if different from above):

Number: _____ Street: _____

City, Town, State, Province or County: _____

Postal/ZIP Code: _____ Country: _____

Place of Birth*

Town or City of Birth*: _____ Country of Birth*: _____

Date of Birth*: _____

Section 2: FATCA Declaration of U.S. Citizenship or U.S. Residence for Tax purposes*

Please tick either (a) or (b) and complete as appropriate.

(a) I confirm that [I am]/[the investor is] a U.S. citizen and/or resident in the U.S. for tax purposes and [my]/[its] U.S. federal taxpayer identifying number (U.S. TIN) is as follows:_____.

OR

(b) I confirm that [I am not]/[the investor is not] a U.S. citizen or resident in the U.S. for tax purposes.

Section 3: CRS Declaration of Tax Residency (please note you may chose more than one country)*

Please indicate your/ the investor’s country of tax residence (if resident in more than one country please detail all countries of tax residence and associated taxpayer identification numbers (“TIN”). Please see the CRS Portal for more information on Tax Residency.

Country of Tax Residency	Tax ID Number

NOTE: Provision of a Tax ID number (TIN) is required unless you are tax resident in a Jurisdiction that does not issue a TIN.

Section 4: Type of Controlling Person

(ONLY to be completed by any individual who is a Controlling Person of an entity investor which is a Passive Non-Financial Entity or an Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution)

For joint or multiple Controlling Persons please complete a separate Self-Certification form for each Controlling Person

Please Confirm what type of Controlling Person applicable under CRS that applies to you/the investor by ticking the appropriate box.	Please Tick	Entity Name
Controlling Person of a legal person – control by ownership		
Controlling Person of a legal person – control by other means		
Controlling Person of a legal person – senior managing official		
Controlling Person of a trust – settlor		
Controlling Person of a trust - trustee		
Controlling Person of a trust – protector		
Controlling Person of a trust - beneficiary		
Controlling Person of a trust - other		
Controlling Person of a legal arrangement (non-trust) – settlor-		
Controlling Person of a legal arrangement (non-trust) –		
Controlling Person of a legal arrangement (non-trust) –		
Controlling Person of a legal arrangement (non-trust) –		
Controlling Person of a legal arrangement (non-trust) –other-		

Section 5: Declaration and Undertakings

I declare that the information provided in this form is, to the best of my knowledge and belief, accurate and complete.

I acknowledge that the information contained in this form and information regarding the Account Holder may be reported to the tax authorities of the country in which this account(s) is/are maintained and exchanged with tax authorities of another country or countries in which the Account Holder may be tax resident where those countries (or tax authorities in those countries) have entered into Agreements to exchange financial account information.

I undertake to advise the recipient promptly and provide an updated Self-Certification form where any change in circumstances occurs which causes any of the information contained in this form to be incorrect.

Authorised Signature*: _____

Print Name*: _____

Date: (dd/mm/yyyy)*: _____

Capacity*: _____

GLOSSARY CRS

Note: These are selected definitions provided to assist you with the completion of this Self-Certification Form. Further details can be found in the Directive 2014/107/EU of 9 December 2014 “as regards mandatory automatic exchange of information” and in the OECD Standard for Automatic Exchange of Financial Account Information (“OECD Common Reporting Standard, CRS”).

“Account Holder”

The “Account Holder” in VanEck ICAV is the person listed or identified as the holder of the Debt or Equity Interest in VanEck ICAV. This is regardless of whether such person is a flow-through Entity.

A person, other than a Financial Institution, holding a Debt or Equity Interest in VanEck ICAV for the benefit or account of another person as agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as holding the account, and such other person is treated as holding the account.

“Active NFE”

An entity will be classified as Active NFE if it meets any of the following criteria:

- a) less than 50% of the NFE's gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50% of the assets held by the NFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of passive income;
- b) the stock of the NFE is regularly traded on an established securities market or the NFE is a Related Entity of an Entity the stock of which is regularly traded on an established securities market;
- c) the NFE is a Governmental Entity, an International Organisation, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
- d) substantially all of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, except that an Entity does not qualify for this status if the Entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;
- e) the NFE is not yet operating a business and has no prior operating history, (a “ start-up NFE”) but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the NFE does not qualify for this exception after the date that is 24 months after the date of the initial organisation of the NFE;
- f) the NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a Financial Institution;
- g) the NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution; or
- h) the NFE meets all of the following requirements (a “non-profit NFE”) :
 - i. it is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated exclusively for the promotion of social welfare;
 - ii. it is exempt from income tax in its jurisdiction of residence;
 - iii. it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - iv. the applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and
 - v. the applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents require that, upon the NFE's liquidation or dissolution, all of its assets be distributed to a Governmental Entity or other non-profit organisation, or escheat to the government of the NFE's jurisdiction of residence or any political subdivision.

“Control”

“Control” over an Entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest (typically on the basis of a certain percentage (e.g. 25%)) in the Entity. Where no natural person(s) exercises control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercises control of the Entity through other means. Where no natural person(s) is/are identified as exercising control of the Entity through ownership interests, then under the CRS the Reportable Person is deemed to be the natural person who hold the position of senior managing official.

“Controlling Person(s)”

“Controlling Persons” are the natural person(s) who exercise control over an entity. Where that entity is treated as a Passive Non-Financial Entity (“Passive NFE”) then a Financial Institution is required to determine whether or not these Controlling Persons are Reportable Persons. This definition corresponds to the term “beneficial owner” described in Recommendation 10 of the Financial Action Task Force Recommendations (as adopted in February 2012).

In the case of a trust, the Controlling Person(s) are the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust (including through a chain of control or ownership). Under the CRS the settlor(s), the trustee(s), the protector(s) (if any), and the beneficiary(ies) or class(es) of beneficiaries, are always treated as Controlling Persons of a trust, regardless of whether or not any of them exercises control over the activities of the trust.

Where the settlor(s) of a trust is an Entity then the CRS requires Financial Institutions to also identify the Controlling Persons of the settlor(s) and when required report them as Controlling Persons of the trust.

In the case of a legal arrangement other than a trust, “Controlling Person(s) means persons in equivalent or similar positions.

“Financial Institution”

The term “Financial Institution” means a “Custodial Institution”, a “Depository Institution”, an “Investment Entity”, or a “Specified Insurance Company”. Please see the relevant domestic guidance and the CRS for further classification definitions that apply to Financial Institutions.

“Investment Entity”

The term “Investment Entity” includes two types of Entities:

- (i) an Entity that primarily conducts as a business one or more of the following activities or operations for or on behalf of a customer:
- Trading in money market instruments (cheques, bills, certificates of deposit, derivatives, etc.); foreign exchange; exchange, interest rate and index instruments; transferable securities; or commodity futures trading;
 - Individual and collective portfolio management; or
 - Otherwise investing, administering, or managing Financial Assets or money on behalf of other persons.

Such activities or operations do not include rendering non-binding investment advice to a customer.

(ii) The second type of “Investment Entity” (“Investment Entity managed by another Financial Institution” – as defined under §A(6)(b) of Section VIII of the CRS) is any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets where the Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity.

“Investment Entity managed by another Financial Institution”

An Entity is “managed by” another Entity if the managing Entity performs, either directly or through another service provider on behalf of the managed Entity, any of the activities or operations described in clause (i) above in the definition of ‘Investment Entity’.

An Entity only manages another Entity if it has discretionary authority to manage the other Entity’s assets (either in whole or part).

“NFE”

An “NFE” is any Entity that is not a Financial Institution.

“Non-Participating Jurisdiction”

A “Non-Participating Jurisdiction” means a jurisdiction with which no agreement is in place pursuant to which it will provide the information set out in the CRS.

“Participating Jurisdiction Financial Institution”

The term “Participating Jurisdiction Financial Institution means (i) any Financial Institution that is tax resident in a Participating Jurisdiction, but excludes any branch of that Financial Institution that is located outside of that jurisdiction, and (ii) any branch of a Financial Institution that is not tax resident in a Participating Jurisdiction, if that branch is located in such Participating Jurisdiction.

“Passive NFE”

Under the CRS a “Passive NFE” means any: (i) NFE that is not an Active NFE; and (ii) Investment Entity as defined under §A (6)(b) of Section VIII of the CRS resident in a Non-Participating Jurisdiction.

“Related Entity”

An Entity is a “Related Entity” of another Entity if either Entity controls the other Entity, or the two Entities are under common control. For this purpose control includes direct or indirect ownership of more than 50% of the vote and value in an Entity.

“Resident for tax purposes”

Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of his domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to solve cases of double residence for determining their residence for tax purposes. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. A trust is treated as resident where one or more of its trustees is resident.

“TIN” (including “functional equivalent”)

The term “TIN” means Taxpayer Identification Number or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction.

Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a “functional equivalent”). Examples of that type of number include, for individuals, the social security number.

Entity Self-Certification Form for FATCA and CRS

Instructions for completion

We are obliged under Section 891E, Section 891F and Section 891G of the Taxes Consolidation Act 1997 (as amended) and regulations made pursuant to those sections to collect certain information about each investor's tax arrangements. Please complete the sections below as directed and provide any additional information that is requested. Please note that in certain circumstances we may be legally obliged to share this information, and other financial information with respect to an investor's interests in the Fund with relevant tax authorities. This form is intended to request information only where such request is not prohibited by Irish law.

If you have any questions about this form or defining the investor's tax residency status, please refer to the OECD CRS Portal or speak to a tax adviser.

For further information on FATCA or CRS please refer to Irish Revenue website at <http://www.revenue.ie/en/business/aeoi/index.html> or the following link: <http://www.oecd.org/tax/automatic-exchange/> in the case of CRS only.

If any of the information below about the investor's tax residence or FATCA/CRS classification changes in the future, please ensure that we are advised of these changes promptly.

*(Mandatory fields are marked with an *)*

Investors that are individuals should not complete this form and should complete the form entitled "Individual Self-Certification for FATCA and CRS".

Section 1: Investor Identification (please refer to the glossary)

Investor Name*: _____ (the Entity)

Country of Incorporation or Organisation: _____

Current Registered Address*:

Number: _____ Street: _____

City, town, State, Province or County: _____

Postal Code/ZIP Code: _____ Country: _____

Mailing address (if different from above):

Number: _____ Street: _____

City, town, State, Province or County: _____

Postal Code/ZIP Code: _____ Country: _____

Section 2: FATCA Declaration Specified U.S. Person:

Please tick either (a), (b) or (c) below and complete as appropriate.

The Entity is a Specified U.S Person and the Entity's U.S Federal Taxpayer Identifying number (U.S. TIN) is as follows: _____.

Or

The Entity is not a Specified U.S Person (please also complete Sections 3, 4 and 5)

Or

The Entity is a US person but not a Specified U.S Person (please also complete Sections 3, 4 and 5)

Section 3: Entity's FATCA Classification*

(The information provided in this section is for FATCA, please note your classification may differ from your CRS classification in Section 5.):

3.1 Financial Institutions:

If the Entity is a Financial Institution, please tick one of the below categories, and provide the Entity's GIIN at 3.2:

I.	Irish Financial Institution or a Partner Jurisdiction Financial Institution	
II.	Registered Deemed Compliant Foreign Financial Institution	
III.	Participating Foreign Financial Institution	

3.2 Please provide the Entity's Global Intermediary Identification number (GIIN):

3.3 If the Entity is a Financial Institution but unable to provide a GIIN, please tick one of the below reasons:

I.	The Entity has not yet obtained a GIIN but is sponsored by another entity which does have a GIIN Please provide your sponsor's name and sponsor's GIIN: Sponsor's Name: _____ Sponsor's GIIN: _____	
II.	Exempt Beneficial Owner	
III.	Certified Deemed Compliant Foreign Financial Institution (including a deemed compliant Financial Institution under Annex II of the Agreement)	
IV.	Non-Participating Foreign Financial Institution	
V.	Excepted Foreign Financial Institution	

3.4 Non-Financial Institutions under FATCA:

If the Entity is not a Financial Institution, please tick one of the below categories

I.	Active Non-Financial Foreign Entity	
II.	Passive Non-Financial Foreign Entity (If this box is ticked, please include self-certification forms for each of your Controlling Persons)	
III.	Excepted Non-Financial Foreign Entity	

Section 4: CRS Declaration of Tax Residency (please note that you may choose more than one country)*

Please indicate the Entity's country of tax residence for CRS purposes, (if resident in more than one country please detail all countries of tax residence and associated tax identification numbers ("TIN")).

Note: Provision of a Tax ID number (TIN) is required unless you are tax resident in a Jurisdiction that does not issue a TIN.

If the Entity is not tax resident in any jurisdiction (e.g., because it is fiscally transparent), please indicate that below and provide its place of effective management or country in which its principal office is located.

Country of Tax Residency	Tax ID Number

Section 5: Entity's CRS Classification*:

The information provided in this section is for CRS. Please note an Entity's CRS classification may differ from its FATCA classification in Section 3:

For more information please see the CRS Standard and associated commentary. <http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/common-reporting-standard-and-related-commentaries/#d.en.345314>

5.1 Financial Institutions under CRS:

If the Entity is a Financial Institution, please tick one of the below categories

I.	Financial Institution under CRS(other than (II) below)	
II.	An Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution (If this box is ticked, please indicate the name of any Controlling Person(s) of the Entity and complete a separate individual self-certification forms for each of your Controlling Persons **)	

5.2 Non Financial Institutions under CRS:

If the Entity is a Non-Financial Institution, please tick one of the below categories

I.	Active Non-Financial Entity – a corporation the stock of which is regularly traded on an established securities market or a corporation which is a related entity of such a corporation	
II.	Active Non-Financial Entity – a Government Entity or Central Bank	
III.	Active Non-Financial Entity – an International Organisation	
IV.	Active Non-Financial Entity – other than (I)-(III) (for example a start-up NFE or a non-profit NFE)	
V.	Passive Non-Financial Entity (If this box is ticked, please complete a separate Individual Self-Certification Form for each of your Controlling Person(s))	

***Controlling Persons: Please note that each Controlling Person must complete a Separate Individual Self-Certification form. If there are no natural person(s) who exercise control of the Entity then the Controlling Person will be the natural person(s) who hold the position of senior managing official of the Entity.*

For further information on Identification requirements under CRS for Controlling Persons, see the Commentary to Section VIII of the CRS Standard.

<http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/common-reporting-standard-and-related-commentaries/#d.en.345314>

Section 6: Declarations and Undertakings

I/We declare (as an authorised signatory of the Entity) that the information provided in this form is, to the best of my/our knowledge and belief, accurate and complete.

I/We undertake to advise the recipient promptly and provide an updated Self-Certification where any change in circumstance occurs which causes any of the information contained in this form to be incorrect.

Signature of Applicant or Authorised Signatories *

First name & surname:	First name & surname:
Capacity authorised signatory (if applicable)	Capacity authorised signatory (if applicable)
Function / Title:	Function / Title:
Telephone:	Telephone:
Fax:	Fax:
Email:	Email:
Date:	Date:

GLOSSARY CRS

Note: These are selected definitions provided to assist you with the completion of this Self-Certification Form. Further details can be found in the Directive 2014/107/EU of 9 December 2014 “as regards mandatory automatic exchange of information” and in the OECD Standard for Automatic Exchange of Financial Account Information (“OECD Common Reporting Standard, CRS”).

“Account Holder”

The “Account Holder” in VanEck ICAV is the person listed or identified as the holder of the Debt or Equity Interest in VanEck ICAV. This is regardless of whether such person is a flow-through Entity.

A person, other than a Financial Institution, holding a Debt or Equity Interest in VanEck ICAV for the benefit or account of another person as agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as holding the account, and such other person is treated as holding the account.

“Active NFE”

An entity will be classified as Active NFE if it meets any of the following criteria:

- a) less than 50% of the NFE’s gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50% of the assets held by the NFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of passive income;
- b) the stock of the NFE is regularly traded on an established securities market or the NFE is a Related Entity of an Entity the stock of which is regularly traded on an established securities market;
- c) the NFE is a Governmental Entity, an International Organisation, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
- d) substantially all of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, except that an Entity does not qualify for this status if the Entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;
- e) the NFE is not yet operating a business and has no prior operating history, (a “start-up NFE”) but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the NFE does not qualify for this exception after the date that is 24 months after the date of the initial organisation of the NFE;
- f) the NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a Financial Institution;
- g) the NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution; **or**
- h) the NFE meets all of the following requirements (a “non-profit NFE”):
 - i. it is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated exclusively for the promotion of social welfare;
 - ii. it is exempt from income tax in its jurisdiction of residence;
 - iii. it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - iv. the applicable laws of the NFE’s jurisdiction of residence or the NFE’s formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE’s charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and
 - v. the applicable laws of the NFE’s jurisdiction of residence or the NFE’s formation documents require that, upon the NFE’s liquidation or dissolution, all of its assets be distributed to a Governmental Entity or other non-profit organisation, or escheat to the government of the NFE’s jurisdiction of residence or any political subdivision.

“Control”

“Control” over an Entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest (typically on the basis of a certain percentage (e.g. 25%)) in the Entity. Where no natural person(s) exercises control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercises control of the Entity through other means. Where no natural person(s) is/are identified as exercising control of the Entity through ownership interests, then under the CRS the Reportable Person is deemed to be the natural person who hold the position of senior managing official.

“Controlling Person(s)”

“Controlling Persons” are the natural person(s) who exercise control over an entity. Where that entity is treated as a Passive Non-Financial Entity (“Passive NFE”) then a Financial Institution is required to determine whether or not these Controlling Persons are Reportable Persons. This definition corresponds to the term “beneficial owner” described in Recommendation 10 of the Financial Action Task Force Recommendations (as adopted in February 2012).

In the case of a trust, the Controlling Person(s) are the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust (including through a chain of control or ownership). Under the CRS the settlor(s), the trustee(s), the protector(s) (if any), and the beneficiary(ies) or class(es) of beneficiaries, are always treated as Controlling Persons of a trust, regardless of whether or not any of them exercises control over the activities of the trust.

Where the settlor(s) of a trust is an Entity then the CRS requires Financial Institutions to also identify the Controlling Persons of the settlor(s) and when required report them as Controlling Persons of the trust.

In the case of a legal arrangement other than a trust, “Controlling Person(s) means persons in equivalent or similar positions.

“Financial Institution”

The term “Financial Institution” means a “Custodial Institution”, a “Depository Institution”, an “Investment Entity”, or a “Specified Insurance Company”. Please see the relevant domestic guidance and the CRS for further classification definitions that apply to Financial Institutions.

“Investment Entity”

The term “Investment Entity” includes two types of Entities:

- (i) an Entity that primarily conducts as a business one or more of the following activities or operations for or on behalf of a customer:
- Trading in money market instruments (cheques, bills, certificates of deposit, derivatives, etc.); foreign exchange; exchange, interest rate and index instruments; transferable securities; or commodity futures trading;
 - Individual and collective portfolio management; or
 - Otherwise investing, administering, or managing Financial Assets or money on behalf of other persons.

Such activities or operations do not include rendering non-binding investment advice to a customer.

(ii) The second type of “Investment Entity” (“Investment Entity managed by another Financial Institution” – as defined under §A(6)(b) of Section VIII of the CRS) is any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets where the Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity.

“Investment Entity managed by another Financial Institution”

An Entity is “managed by” another Entity if the managing Entity performs, either directly or through another service provider on behalf of the managed Entity, any of the activities or operations described in clause (i) above in the definition of ‘Investment Entity’.

An Entity only manages another Entity if it has discretionary authority to manage the other Entity’s assets (either in whole or part).

“NFE”

An “NFE” is any Entity that is not a Financial Institution.

“Non-Participating Jurisdiction”

A “Non-Participating Jurisdiction” means a jurisdiction with which no agreement is in place pursuant to which it will provide the information set out in the CRS.

“Participating Jurisdiction Financial Institution”

The term “Participating Jurisdiction Financial Institution means (i) any Financial Institution that is tax resident in a Participating Jurisdiction, but excludes any branch of that Financial Institution that is located outside of that jurisdiction, and (ii) any branch of a Financial Institution that is not tax resident in a Participating Jurisdiction, if that branch is located in such Participating Jurisdiction.

“Passive NFE”

Under the CRS a “Passive NFE” means any: (i) NFE that is not an Active NFE; and (ii) Investment Entity as defined under §A (6)(b) of Section VIII of the CRS resident in a Non-Participating Jurisdiction.

“Related Entity”

An Entity is a “Related Entity” of another Entity if either Entity controls the other Entity, or the two Entities are under common control. For this purpose control includes direct or indirect ownership of more than 50% of the vote and value in an Entity.

“Resident for tax purposes”

Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of his domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to solve cases of double residence for determining their residence for tax purposes. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. A trust is treated as resident where one or more of its trustees is resident.

“TIN” (including “functional equivalent”)

The term “TIN” means Taxpayer Identification Number or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction.

Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a “functional equivalent”). Examples of that type of number include, for Entities, a Business/company registration code/number.

Appendix A – Definition of “U.S. Person”

For purposes of this Application Form, a “U.S. Person” means:

- (i) Any natural person resident in the United States;
- (ii) Any partnership or corporation organized or incorporated under the laws of the United States;
- (iii) Any estate of which any executor or administrator is a U.S. Person;
- (iv) Any trust of which any trustee is a U.S. Person;
- (v) Any agency or branch of a non-U.S. entity located in the United States;
- (vi) Any non-discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary for the benefit or account of a U.S. Person;
- (vii) Any discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary organized, incorporated, or (if an individual) resident in the United States; and
- (viii) Any partnership or corporation if:
 - (a) Organized or incorporated under the laws of any non-U.S. jurisdiction; and
 - (b) Formed by a U.S. Person principally for the purpose of investing in securities not registered under the Act, unless it is organized or incorporated, and owned, by accredited investors (as defined in Rule 501(a) of Regulation D under the Securities Act) who are not natural persons, estates or trusts.

Notwithstanding the preceding paragraph, “U.S. Person” shall not include:

- (i) Any discretionary account or similar account (other than an estate or trust) held for the benefit or account of a non-U.S. Person by a dealer or other professional fiduciary organized, incorporated, or (if an individual) resident in the United States;
- (ii) Any estate of which any professional fiduciary acting as executor or administrator is a U.S. Person if:
 - (a) An executor or administrator of the estate who is not a U.S. Person has sole or shared investment discretion with respect to the assets of the estate; and
 - (b) The estate is governed by non-U.S. law;
- (iii) Any trust of which any professional fiduciary acting as trustee is a U.S. Person, if a trustee who is not a U.S. Person has sole or shared investment discretion with respect to the trust assets, and no beneficiary of the trust (and no settlor if the trust is revocable) is a U.S. Person;
- (iv) An employee benefit plan established and administered in accordance with the law of a country other than the United States and customary practices and documentation of such country;
- (v) Any agency or branch of a U.S. Person located outside the United States if:
 - (a) The agency or branch operates for valid business reasons; and
 - (b) The agency or branch is engaged in the business of insurance or banking and is subject to substantive insurance or banking regulation, respectively, in the jurisdiction where located; and
- (vi) The International Monetary Fund, the International Bank for Reconstruction and Development, the Inter- American Development Bank, the Asian Development Bank, the African Development Bank, the United Nations, and their agencies, affiliates and pension plans, and any other similar international organizations, their agencies, affiliates and pension plans.
- (vii) An entity excluded or exempted from the definition of “U.S. Person” in reliance on or with reference to interpretations or positions of the U.S. Securities and Exchange Commission or its staff.

Appendix B – Data Protection Notice

VANECK ONLINE AND CUSTOMER PRIVACY POLICY

Our Commitment to You

VanEck is strongly committed to safeguarding the privacy and confidentiality of the Personal Data you have entrusted to us. This Online and Customer Privacy Notice applies to the operations of Van Eck Associates Corporation, its subsidiaries and funds sponsored or managed by VanEck (together “**VanEck**”, “**we**” or “**us**”). It covers VanEck's processing of Personal Data relating to visitors of our website, our customers, shareholders, suppliers and other individuals, who are not our employees.

Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your Personal Information. Please check these policies before you submit any Personal Data to such third party websites.

This privacy policy outlines our commitment to you.

1. Accountability

We have strict policies and procedures governing how we deal with your [Personal Data](#). Each of our employees is responsible for respecting and protecting the Personal Data to which the employee has access.

Our management oversees privacy governance including policy, dispute resolution, education, communications activities and reporting to our Board of Directors on privacy matters. Please see [Contact](#) for more information.

2. Personal Data that we collect

We only collect the [Personal Data](#) that we determine to be required for the purposes set out in section 3 below:

We collect:

- **Information you provide to us:** Personal Data that you provide to us, such as when using the contact form on our websites, including your name, email address, and other contact details;
- **Our correspondence:** if you contact us, we will typically keep a record of that correspondence;
- **Marketing preference information:** details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you;
- **Device Information:** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud and manage risk;
- **Website and communication usage:** details of your visits to the websites and information collected through cookies and other tracking technologies including your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access;
- **Email tracking information:** VanEck or our service providers may also use cookies, web server logs, web beacons, or other electronic tools to collect and compile statistical and other non-personal information about your use of the websites and the services provided on the websites. Additional information about VanEck's use of cookies can be found under the heading [Collection of Information Using Cookies and Other Tools](#). Our emails may contain a single, campaign-unique "web beacon pixel" to tell us whether our emails are opened and combined with other technology verify any clicks through to links within the email. We may use this information for purposes including determining which of our emails are more interesting to you and to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email. If

you do not wish the pixel to be downloaded to your device, you should unsubscribe from the receipt of our emails. This information may include Personal Information;

- **Call recordings:** we may monitor or record our incoming or outgoing telephone calls with you to ensure accuracy, security, service quality, for training purposes and to establish a record of our communications. If you do not wish to have your call recorded, you have other options to conduct business with us such as online, or by contacting us in writing;
- **Anti-Crime and Fraud Information:** information relating to your financial situation, your creditworthiness or any criminal or fraudulent activities provided to us by you or third parties including information which establishes your identity, such as passports and or other official documents; information about transactions, credit ratings from credit reference agencies or information pooling groups; fraud, offences, suspicious transactions, politically exposed person and sanctions lists where your details are included;
- **Your transactions and holdings:** details of transactions with us or holdings with us that you have made or initiated; and
- **Survey information:** we may also ask you to complete surveys that we use for research purposes. In such circumstances we shall collect the information provided in the completed survey.

VanEck's websites are not directed at children under the age of 13, and VanEck does not knowingly collect personal data from any child under the age of 13. If we learn that we have collected or received personal data from a child under 13 without verification of parental consent, we will delete that information. Please instruct us accordingly.

3. Purposes for which we use your Personal Data

When we collect your [Personal Data](#), we may use or disclose it for the following purposes. Below each purpose we note the "legal ground" that allows such use of your Personal Information. An explanation of the scope of the "legal grounds" can be found in [Annex B](#) hereto.

- **To communicate with you regarding products and services that may be of interest:** to provide your company and you with updates and offers, where you have chosen to receive these. We may also use your information for marketing our own and our selected business partners' products and services to you by post, email, phone, SMS or online or social media advertisement. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by visiting [Contact](#).

Use justifications: consent, legitimate interests (to keep you updated with news in relation to our products and services)

- **To communicate effectively with you and conduct our business:** to conduct our business, including to respond to your queries, to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you or your company and us.

Use justifications: contract performance, legitimate interests (to enable us to perform our obligations and provide our services to you)

- **To understand our customers and to develop and tailor our products and services:** we or third party service providers (e.g. Google Analytics) on our behalf may analyze the Personal Data we hold in order to better understand our clients' services and marketing requirements, to better understand our business and develop our products and services. In order to ensure that content from our website is presented in the most effective manner for you and for your device, we may pass your data to business partners, suppliers and/or service providers.

Use justifications: legitimate interests (to ensure the quality and legality of our services, to allow us to improve our services and to allow us to provide you with the content and services on the website)

- **To provide and manage products and services:** to administer our services, including to carry out our obligations arising from any agreements entered into between you or your company and us, or to notify you about changes to our services and products.

Use justifications: contract performance, consent, legitimate interests (to enable us to perform our obligations and provide our services to you or to notify you about changes to our service)

- **To verify your identity, protect against fraud and manage risk:** we and other organizations may access and use certain information to prevent fraud, money laundering and terrorism as may be required by applicable law and regulation and best practice at any given time, including checking against sanctions, politically exposed persons (PEP) and other fraud or crime screening databases. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.

Use justifications: legal obligations, legal claims, legitimate interests (to prevent crimes and protect our business)

- **To comply with legal or regulatory requirements, or as otherwise permitted by law:** we may process your Personal Data to comply with our regulatory requirements or dialogue with our regulators or defend or prosecute claims as applicable which may include disclosing your Personal Data to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

Use justifications: legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

- **To inform you of changes:** to notify you about changes to our services and products.

Use justification: legitimate interests (to notify you about changes to our service)

- **To monitor certain activities:** to monitor queries and transactions to ensure service quality, compliance with procedures and to combat fraud.

Use justifications: legal obligations, legal claims, legitimate interests (to ensure that the quality and legality of our services)

- **To reorganize or make changes to our business:** in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party, (ii) are sold to a third party or (iii) undergo a reorganization, we may need to transfer some or all of your Personal Data to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analyzing any proposed sale or reorganization, certainly limited to what is required for this purpose and only to the extent allowed under applicable laws. We may also need to transfer your Personal Data to that reorganized entity or third party after the sale or reorganization for them to use for the same purposes as set out in this policy.

Use justifications: legitimate interests (in order to allow us to change our business)

4. Consent and Your Choices

Most of our processing is permitted by "legal grounds" other than consent (see section 2 above). In relation to [Direct Marketing](#), where we are required to do so, we will obtain your consent before using your Personal Data for this purpose. If you prefer not to receive our [Direct Marketing](#) communications, you can have your name deleted from our [Direct Marketing](#) and/or shared information lists. If you want to change your privacy preferences, please see [Contact](#).

5. Sharing your Personal Data (and transfers outside your country)

We will only use or disclose your [Personal Data](#) for the purpose(s) it was collected and as otherwise identified in this Privacy Policy.

- **Sharing within the VanEck group:** We may share your [Personal Data](#) within the VanEck group, including locations outside of the European Economic Area where we do business, for marketing purposes, for legal and regulatory purposes, to manage credit risk and other business risks, to ensure we have correct or up to date information about you and to better manage your relationship with us.
- **Sharing outside the VanEck group:** [Personal Data](#) may be provided to third parties, including anti-fraud organizations, legal, regulatory or law enforcement authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets (for example, collection of overdue accounts).
- **Business sale or reorganization:** Over time, we may buy new businesses or sell some of our businesses. Accordingly, [Personal Data](#) associated with any accounts, products or services of the business being purchased or sold will be reviewed as part of the due diligence process and subsequently transferred as a business asset to the new business owner. We may also transfer [Personal Data](#) as part of a corporate reorganization or other change in corporate control.
- **Sub-contractors and agents:** We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, fraud prevention and detection and marketing. Such companies will be given only the [Personal Data](#) needed to perform those services and we do not authorize them to use or disclose [Personal Data](#) for their own marketing or other purposes. We have contracts in place holding these companies to standards of confidentiality equivalent to ours.
- **Transfers of personal data:** Your Personal Data may be accessed by staff, suppliers or other persons in, transferred to, and/or stored at, a destination outside your country, including outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in your country/the EEA. We will, in all circumstances, safeguard personal information as set out in this Privacy Policy.

Where we transfer personal information from inside the EEA to outside the EEA, we may be required to take specific additional measures to safeguard the relevant personal information. In accordance with applicable law to ensure an adequate level of protection, we ensure that the transfer outside the EEA is only done after implementing one of the following safeguards:

- The country to which we transfer your personal data is approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions; or
- We will establish legal grounds justifying such transfer, such as EU Commission-approved model contractual clauses, or other legal grounds permitted by applicable legal requirements. Please Contact Us if you would like to see a copy of the specific safeguards applied to the export of your Personal Information.

VanEck uses Google Analytics. As Google may have servers based outside the European Economic Area (EEA) VanEck may transfer your personal data to Google in the United States, in which data protection laws are of a lower standard than in your country/the EEA. We will, in all circumstances, safeguard personal information as set out in this Privacy Policy.

Please [Contact](#) us if you would like to see a copy of the specific safeguards applied to the export of your Personal Information.

6. Retention of Personal Data

Our retention periods for personal data are based on business needs and legal requirements. We retain your [Personal Data](#) for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain business emails preparing a commercial transaction according to statutory retention periods or where required for the purpose under best practices applying to these business correspondence, as applicable from jurisdiction to jurisdiction. Also in other cases, we retain Personal Data to comply with regulatory requirements regarding the retention of such data. When [Personal Data](#) is no longer needed, our policy is to either irreversibly anonymize the data (and we may further retain and use the anonymized information) or securely destroy the data. For Google Analytics in particular, the retention period is 26 months.

7. Accuracy and security of your Personal Data

We are committed to maintaining the accuracy of your [Personal Data](#) and ensuring that it is complete and up-to-date. If you discover inaccuracies in our records, or your [Personal Data](#) changes, please notify us immediately so that we can make the necessary changes. Failure to notify us of changes to your [Personal Data](#) may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your [Personal Data](#) that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision as described in [Contact](#).

Safeguarding your Personal Information

We use physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your [Personal Data](#) in our custody or control.

We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

Security over the internet

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of.

8. Changes to this Privacy Policy

From time to time, we may make changes to this Privacy Policy without prior notice to you. We will note the date of the most recent revision of this Privacy Policy at the bottom of the page.

Please see [Contact](#) to answer any questions you may have about our Privacy Policy.

9. Your Rights

If you have any questions in relation to our use of your personal information, you should first contact us as per the [Contact](#) section below. If you reside in the EEA or your data is processed by one of our European affiliates, under certain conditions (in particular where VanEck has directed the use of your Personal Data from one of its European subsidiaries), you may have the right to require us to:

- provide you with further details on the use we make of your information;

- provide you with a copy of information that you have provided to us;
- update any inaccuracies in the personal information we hold (please see paragraph 7);
- delete any personal information that we no longer have a lawful ground to use or retain;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing (see paragraph 4 for marketing);
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your information whilst a complaint is being investigated.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to lodge a complaint with your national Data Protection Authority (DPA), e.g. the DPA in the country you live or work.. We would, however, appreciate the chance to deal with your concerns before you approach the data protection regulator, so please contact us in the first instance. We aim to respond to your request without undue delay and at the latest within one month after receiving such a request. However, this one month term may be extended with two months. In such event, we will inform you within one month after receipt of your request and explain why the extension is necessary.

10. Collection of Information Using Cookies and Other Tools

General

VanEck or our service providers may use "cookies," web server logs, web beacons, or other electronic tools to collect information that is related to you but that does not personally identify you, such as:

- IP address;
- browser type;
- operating system;
- computer platform;
- information about your mobile device;
- geo-location data; and
- the state or country from which you accessed the Sites.

VanEck or our service providers may also use cookies, web server logs, web beacons, or other electronic tools to collect and compile statistical and other non-personal information about your use of the Sites and the services provided on the Sites, such as:

- the web pages you visit on the Sites;
- the date and time of your visit;
- the number of links you click within the Sites;
- the functions you use on the Sites;
- the databases you view and the searches you request on the Sites;
- the data you save on, or download from, the Sites, etc.; and
- the websites you visited immediately before and after visiting the Sites.

A cookie is a small text file placed on your computer. Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. Likewise, most mobile devices allow you to disable the ability for geo-location information to be collected from your mobile device. The help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or disable the collection of geo-location data. You need to set each browser, on each device you use to surf the Web. Thus, if you use multiple browsers (e.g., AOL, Safari, Internet Explorer, Firefox, etc.), you should repeat this procedure with each one. Similarly, if you connect to the Web from multiple devices (e.g., work and home), you need to set each browser on each device. However, if you disable cookies or refuse to accept a request to

place a cookie, it is possible that some parts of the Sites, such as certain areas of the Sites for which you need to log in, will not function properly, and the advertising you receive when you visit the Sites may not be advertisements tailored to your interests.

VanEck reserves the right to place advertising on the Sites. When such advertising is placed on the Sites, VanEck, our service providers, or third-party advertisers or their advertising servers may also place or recognize unique cookies on your computer or use other electronic tools in order to help display advertisements that you may see on the Sites or on other websites. Information about your visits to, and activity on, the Sites and other websites, an IP address, the number of times you have viewed an advertisement, and other such usage information may be used, alone or in combination with other information, to display on your device screen advertisements that may be of particular interest to you. We may use Web beacons, provided by third-party advertising companies, to help manage and optimize our online advertising and product performance. Web beacons enable us to recognize a browser's cookie when a browser visits the Sites, and to learn which banner ads bring users to the Sites. The use and collection of your information by these third-party service providers, and by third-party advertisers and their advertising servers, is not covered by this Online Privacy Policy.

Google Analytics

In addition to the cookies which collect non-personal information about your use of our website and the Services provided within, we may set Google Analytics cookies (a web analysis service of Google Ireland Limited) if you use the website. The information generated includes information about your use of our website (including your IP address), which will be transmitted to and stored by Google on servers in the United States. As we have activated the IP anonymization, Google will anonymize the last octet of your IP address within Google Analytics.

On behalf of us, Google will use this information for the purpose of evaluating your use of the website, compiling reports on activity for website operators and providing other services relating to internet usage. Google will not associate your IP address with any other data held by Google.

We will obtain your consent before we place the Google Analytics cookies on your device. If you have consented to the use of these cookies, you can always refuse or delete these cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of our website. Furthermore you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en>.

VanEck does not process or respond to web browsers' "do not track" signals or other similar transmissions that indicate a request to disable online tracking of users who visit the Sites. For information about online behavioral advertising networks and how to "opt out" of advertising cookies placed by the Network Advertising Initiative's ("NAI") member networks, and thereby limit the tracking of your online activity and the targeted advertising you may receive, please [click here](#). Note that even if you opt out of cookies placed by the NAI member networks, you may still receive online advertising. You can also prevent website tracking by changing the settings in your web browser settings as described above to disable cookies permanently or to alert you when cookies are being sent so you can refuse them at that time.

11. Contact Us

If you have any questions or concerns about our privacy practices or the privacy of your Personal Information, please let us know.

To unsubscribe from marketing material we send you, please follow the instructions at the bottom of the email you have received. Alternatively, you may:

- Email us at privacy@vaneck.com; or
- Contact your local VanEck subsidiary in writing.

If after contacting us you do not feel that we have adequately addressed your concerns, you may lodge a complaint with your national Data Protection Authority (DPA), e.g. the DPA in the country you live or work.

Notwithstanding the above, nothing on The Sites should be construed as a solicitation or offer or recommendation to buy or sell any security or to make any transaction.

Last Updated: June 2022

ANNEX A: Definitions

Direct Marketing is our communication with you such as mail, telemarketing or email, using your contact information, to inform you about products and services that we think may be of interest and value to you. This does not include communications regarding products or services that you currently have, including improved ways to use the products, or additional features of the products as well as transactional information.

Personal Data is information about an identifiable individual. It includes information that you have provided to us or was collected by us from other sources. It may include details such as your name and address, age and gender, personal financial records, identification numbers and personal references, to the extent permitted by local laws.

VanEck means Van Eck Associates Corporation, its subsidiaries and funds sponsored or managed by VanEck.

The Sites means www.vaneck.com.

ANNEX B: Table of Legal Bases

Use of personal information under EU data protection laws must be justified under one of a number of legal "grounds" and we are required to set out the grounds in respect of each use in this policy. An explanation of the scope of the grounds available is set out below. We note the grounds we use to justify each use of your information next to the use in the "Uses of your personal information" section of this policy.

These are the principal legal grounds that justify our use of your information:

Consent: where you have consented to our use of your information (you may withdraw your consent by following the instructions at the bottom of the email received, or contacting privacy@vaneck.com).

Contract performance: where your information is necessary to enter into or perform our contract with you.

Legal obligation: where we need to use your information to comply with our legal obligations.

Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.

Substantial Public interest; where we use Personal Data relating to criminal convictions or political affiliations for a purpose that is expressly in the substantial public interest, including for the prevention or detection of crime, particularly money laundering, or fraud.