

U kunt alle soorten klachten over het product of het gedrag van de Ontwikkelaar naar ons sturen per e-mail naar complaints-europe@vaneck.com of per brief naar VanEck (Europe) GmbH, t.a.v. Compliance/Klachtenbehandeling, Kreuznacher Str. 30 60486 Frankfurt/Main, Germany of VanEck Asset Management B.V., Barbara Strozilaan 310 1083 HN Amsterdam, Nederland.

Voor meer informatie zie [Klachtenprocedure](#). In geval van klachten over een advies met betrekking tot het product en met betrekking tot de aankoop van het product, kunt u rechtstreeks contact opnemen met de persoon die het product aan u heeft verkocht of die u heeft geadviseerd het product te kopen.

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a) Summary

VanEck Hydrogen Economy UCITS ETF (het "Fonds") is ingedeeld als artikel 9 van Verordening (EU) 2019/2088 betreffende duurzaamheidsgerelateerde informatieverschaffing in de financiële dienstensector ("SFDR"). Het Fonds heeft een duurzame beleggingsdoelstelling, met de nadruk op ecologische doelstellingen: het is gericht op het promoten van duurzame vormen van energieopwekking, de vermindering van koolstofemissies en uiteindelijk het bijdragen aan het tegengaan van klimaatverandering. Het draagt bij aan ecologische doelstellingen die zijn afgestemd op de Sustainable Development Goal (SDG) over "Betaalbare en schone energie". Om de duurzame beleggingsdoelstelling te bereiken, integreert het Fonds duurzaamheidsoverwegingen in zijn passieve beleggingsproces door middel van integratie van ESG-kenmerken en ESG-gerelateerde uitsluitingen.

Het Fonds heeft een passief beleggingsbeleid, waarbij het zijn referentiebenchmark zo goed mogelijk repliceert. VanEck Hydrogen Economy UCITS ETF belegt in bedrijven die ten minste 50% (25% voor de huidige componenten) van hun inkomsten halen uit:

- Waterstof, inclusief:
 - Waterstof en waterstofgerelateerde segmenten,
 - brandstofcellenprojecten, of
 - projecten die na ontwikkeling minstens 50% van hun inkomsten uit de waterstofindustrie kunnen halen.
- Industriële gassen, inclusief:
 - Productie van industriële gassen (zolang waterstof deel uitmaakt van de productlijn van het bedrijf).

Daarnaast worden bepaalde ESG-gerelateerde uitsluitingen toegepast volgens de indexmethodologie om ervoor te zorgen dat de bedrijven geen significante schade toebrengen aan een andere duurzame ecologische of sociale beleggingsdoelstellingen. De screenings richten zich op:

1. Betrokkenheid bij controversiële sectoren, waarbij bedrijven worden gescreend op betrokkenheid bij:
 - Controversiële wapens en civiele vuurwapens;
 - Tabak, thermische kolen, fossiele brandstoffen, oliezanen, kernenergie, militairen en gokken: er wordt een inkomstendrempel van 5% toegepast.
2. De schendingen van internationale normen op het gebied van bijvoorbeeld mensenrechten, arbeidsrechten, milieurisico's en omkoping.

Door middel van zijn ESG-screening houdt het Fonds rekening met verschillende Belangrijkste Ongunstige Indicatoren, zoals broeikasgasemissies, biodiversiteit, water, afval, sociale thema's en arbeidsomstandigheden, respect voor mensenrechten, anti-corruptie en anti-omkoping.

b) No significant harm to the sustainable investment objective

This Fund does not significantly harm any other environmental or social sustainable investment objective. The Fund takes into account Principal adverse impacts on sustainability factors relating to greenhouse gas emissions, biodiversity, water, waste, social and employee, respect for human rights, anti-corruption and anti-bribery matters. The Fund excludes companies by means of controversial sector involvement screenings, and companies which violate the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

c) Sustainable investment objective of the financial product

The Fund aims at enhancing and developing sustainable forms of energy generation and storage, thereby contributing to environmental objectives aligned with the SDG "Affordable and Clean Energy". Therefore, the Fund invests in companies that generate at least 50% (25% for current components) of their revenues from hydrogen projects or projects that have the potential to generate at least part of their revenues from the hydrogen industry when developed. The Fund may also consider companies generating at least 50% (25% for current components) of their revenues from the production of industrial gases, as long as hydrogen is included in the company's product line.

d) Investment strategy

The Fund's investment objective is to replicate, before fees and expenses, the price and yield performance of the MVIS® Global Hydrogen Economy ESG Index. The Fund seeks to invest in companies which generate revenues from hydrogen projects or projects that have the potential to generate revenues from the hydrogen industry or industrial gases where hydrogen is included in the company's product line.

e) Proportion of investments

It is expected that at least 80% of the Fund's assets will be invested in securities included in the Index and, therefore, aligned with the environmental and social characteristics promoted by the Fund at each Index rebalance. Where, as a result of changes in issuer characteristics or data, the Fund's portfolio no longer reflects one or more of the environmental and/or social characteristics promoted through the Index methodology between Index rebalances, the Fund's portfolio will be realigned with the Index at the next Index rebalance, in order to continue to track the Index in line with the Fund's passive investment objective.

Up to 20% of the Fund's total assets may be invested in other investments.



f) Monitoring of environmental or social characteristics

The Fund's environmental and/or social characteristics are incorporated into the methodology of the benchmark Index. The Fund's Manager, in order to ensure the alignment with the ESG characteristics that the Fund promotes, monitors that the holdings, at each rebalance, are screened against the underlying Index's exclusions. Periodic confirmation on ESG integration is provided to the Manager by the Index provider as part of the ongoing due diligence.

g) Methodologies

The environmental and social characteristics promoted by the Fund are directly linked to those of the reference benchmark, as the investment objective of the Fund is to replicate before fees and expenses the performance of the reference benchmark. The reference benchmark is a rule-based index and therefore continuously applies its methodology, including the applicable environmental and social characteristics. At each Index rebalance, the ESG selection criteria are applied by the Index Provider in order to exclude issuers that do not meet those criteria.

h) Data sources and processing

The Fund has a passive investment strategy, and it seeks to achieve the environmental and social characteristics it promotes by tracking the Index. The index providers use different ESG data providers to integrate screenings into the index methodologies. ESG data for reporting purposes are sourced from the external third-party ESG data provider, Institutional Shareholder Services (ISS).

The measures taken to ensure data quality

VanEck carries periodic due diligence on the index providers and on the above-mentioned third-party ESG data provider to ensure data quality.

How data are processed

VanEck integrates a limited amount of ESG data into the Fund's periodic report. ESG data at index level are processed directly by index provider.

The proportion of data that are estimated

VanEck does not estimate data. However, the index provider may rely on estimated data or on data providers that use estimated data. Although reported data is preferred, missing information may be supplemented by estimates provided by the relevant data providers. Further details on the methodologies applied are available on the websites of the relevant data providers and the index provider.

i) Limitations to methodologies and data

VanEck recognizes the following limitations to methodologies and data:

1. Lack of reported data:

In order to attain the environmental and social characteristics, data from external data providers is used by VanEck and the index provider. Data providers retrieve data from company disclosures, such as annual reports. Not all companies report the required data. Where information is missing, data providers may use estimated data and, in certain cases, data coverage may not be available if the data cannot be estimated. As a result, reported data may not always be available to determine whether the promoted characteristics are attained. By selecting reputable data providers, the risk of inaccurate estimates is mitigated.

2. Actualisation of data:

The index provider rebalances the index on a periodic basis. Between rebalancing dates, it is possible that the Fund's investments may temporarily not be aligned with the promoted environmental and social characteristics.

j) Due Diligence

VanEck carries periodic due diligence on the index provider prior to its appointment and on an ongoing basis. Due diligence is also carried in cases of index methodology changes. The index provider is responsible for the implementation, at index level, of the index methodology.

k) Engagement policies

For passive equity funds, the Manager has also appointed Glass Lewis Europe Limited as third-party engagement provider. Engagement activities are conducted in accordance with the engagement provider's policy and priorities and are intended to encourage improved management of sustainability risks at issuer level. While these activities do not influence portfolio construction, they form part of the Manager's overall approach to sustainability risk management.

l) Attainment of the sustainable investment objective

As passive investments strategy, the Fund has designated its underlying index, the MVIS® Global Hydrogen Economy ESG Index, as reference benchmark to meet the sustainable investment objective.

Sustainability factors are considered as part of screenings which are included in the reference benchmark and assessed at any rebalancing of the underlying Index. By means of Norm-based research and Controversial sector involvement screenings the Fund takes sustainability factors relating to greenhouse gas emissions, biodiversity, water, waste, social and employee, respect for human rights, anti-corruption and anti-bribery matters into account. No EU Climate Transition Benchmark or EU Paris-aligned Benchmark as defined in Article 3, points (23a) and (23b), of Regulation (EU) 2016/1011 is available for this Fund.

More information on the reference benchmark can be found [here](#).

Latest update: April 2026.

