



VanEck Smart Home Active UCITS ETF
Sustainability-related information pursuant to Art. 24 of Regulation (EU) 2022/2088 (“SFDR”)

Product name: VanEck Smart Home Active UCITS ETF
Legal entity identifier: 254900VG2ZKJ2XJZGW28
ISIN: IE000FN81QD2

(a) Summary

VanEck Smart Home Active UCITS ETF (the “Fund”) has been categorised as Article 8(1) of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector (“SFDR”). The Fund promotes environmental and/or social characteristics and invest in companies that follow good governance practices. In order to attain each of the promoted characteristics, the Fund actively integrates Environmental, Social, Governance factors in its investment process by means of ESG-related exclusions, proxy voting on sustainability matters and its engagement policy. The Fund does not have sustainable investment as its investment objective.

The Fund is actively managed and its investment objective is to seek long-term capital appreciation by investing primarily in equity securities of companies which are active in, maintain assets in, or derive revenues from smart homes and intelligent building solutions and that are 100% aligned with the the environmental and social characteristics that it promotes. The Fund invests in a concentrated portfolio of approximately 40 to 60 global equity or equity-related securities. “Smart homes” are categorised as the next phase in the continuous evolving role of the home in everyday life from work, learning, caring and socialising to exercise, shopping and consumption of online products and media. The Investment Advisor will select equity securities which meet the criteria of being in the smart homes and intelligent building solutions (which offer or support smart home solutions including, without limitation, technologies such as improved connectivity and consumer hardware) sector as described under the heading Investment Process.

The Fund’s investments must comply with the following binding element: excusion of companies based on the Norges Bank Exclusion List. This includes companies involved in production of coal or coal-based energy, serious violations of individuals' rights in situations of war or conflict, production of nuclear weapons, production of tobacco, severe environmental damage, gross corruption, unacceptable greenhouse gas emissions, violation of human rights, production of cluster munitions and other particularly serious violations of fundamental ethical norms.

Through its ESG based exclusions and its proxy voting policy, the Fund considers several Principle Adverse Indicators, such as greenhouse gas emissions, biodiversity, water, waste, social and employee, respect for human rights, anti-corruption and anti-bribery matters.

Moreover, good governance practices of the investee companies are assessed by excluding companies based on an ESG score, which takes into account, among others, performance on the issues of ownership & control, board composition, pay, accounting practices, business ethics and tax transparency.

(b) No sustainable investment objective

The Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

(c) Environmental or social characteristics of the financial product

The following environmental and social characteristics apply to the Fund’s investments:

1. The Fund promotes the reduction of the most negative impacts on society and the environment through:
 - Reducing exposure to very severe controversies relating to international standards on responsible business, human rights and labour right;
 - Minimizing exposure to controversial business activities relating to tobacco, controversial weapons, energy extractives, civilian firearms and military;
 - Limiting exposure to carbon risk, by excluding companies deriving significant (>5%) revenues from energy extractives, such as thermal coal.
2. The Glass Lewis ESG policy guidelines are applied whereby votes are cast on sustainability matters.
3. The Engagement policy applies to the Fund, whereby active engagement with investee companies is an integral component of the investment process.

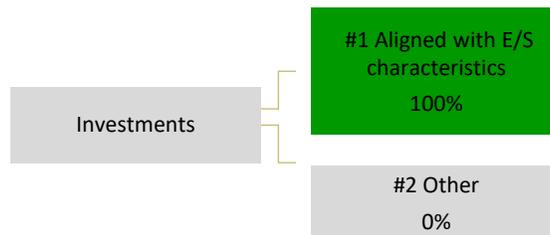
(d) Investment strategy

The Fund’s investment objective is to seek long-term capital appreciation by investing primarily in equity securities of companies which are active in, maintain assets in, or derive revenues from smart homes and intelligent building solutions. In addition, the fund takes privacy and data security and carbon emissions scores into account in its selections process. Glass Lewis ESG-tilted voting policy is applied, whereby casted votes in shareholder meetings of companies in the portfolio concern sustainability matters.

Good governance relates to sound management structures, employee relations, remuneration of staff and tax compliance. In its investment screening process, the fund uses an ESG score, which takes into account, among others, performance on the issues of ownership & control, board composition, pay, accounting practices, business ethics and tax transparency. In addition, The Manager uses its influence as a shareholder to achieve improvements in the ESG field, thereby contributing to the quality, sustainability and continuity of companies and markets.

(e) Proportion of investments

The Fund invests in direct financial instruments of which 100% is aligned with the environmental and social characteristics that it promotes.



(f) Monitoring of environmental or social characteristics

The environmental and social characteristics are monitored in the following manner:

1. The Fund promotes the reduction of the most negative impacts on society and the environment.
 - The Fund measured the following sustainability indicator(s):
 - Overall ESG rating of the portfolio;
 - The number of sustainability matters voted on in shareholder meetings.
 - This is monitored in the following manner:
 - Investments are analysed and monitored on their strategic and financial merits as well as their Environmental Social and Governance (ESG) performance by the Investment Advisor;
 - Alignment of the exclusion list of the to the Investment Advisor with the exclusions list of the Norwegian Sovereign Wealth Fund;
 - The Portfolio Management Team and the Legal and Compliance Team check the exclusions from the portfolio on a monthly base, in line with the portfolio rebalance.
2. The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.
 - This is monitored in the following manner:
 - VanEck has appointed a service provider to exercise voting rights. VanEck is periodically informed by the service provider on the voting activities.
3. The Engagement policy applies to the Fund, whereby active engagement with investee companies is an integral component of the investment process.
 - This is monitored in the following manner:
 - Review of the engagement policy when necessary.

(g) Methodologies

The screening of companies consists of a several components as described above. The exact methodology of the Fund's sustainable investments objective is determined by the Index provider. More information can be found in the Fund's index rules.

Voting is delegated to Glass Lewis. Glass Lewis determines the voting approach based on its assessment of the voting proposals and the alignment with the voting policy. VanEck is periodically informed on the activities and has access to an online platform where the information on the proxy voting, policy implementation, recordkeeping and reporting can be found.

(h) Data sources and processing

The data sources used

- external ESG data providers

The measures taken to ensure data quality

The mentioned data sources are used by VanEck, the Investment Advisor and/or its service provider. VanEck does not receive most of the the data directly from data providers. Data quality measures are integrated into the reporting service tool. It is also relevant that the data used by the service provider is of sufficient quality. The service provider have set up their internal processes to do so.

How data are processed

VanEck does not process most of the data on its own for the Fund. Other than the reporting service tool VanEck uses, the reports it receives on a periodic basis come from the service provider. VanEck is periodically informed on the i progress of the voting activities.

The proportion of data that are estimated

VanEck does not estimate data, but cannot rule out that the service provider does estimate data and/or use data provider wich estimate data. Although reported data is preferred, missing information is often supplemented

with estimated data by the data providers. For more information on how this exactly is determined, we refer to the website of the mentioned data and service providers.

(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/or the service provider. Data providers retrieve data from company reports (such as annual reports). Not all companies report the data. Missing data is sometimes estimated by data providers and at times there is no data coverage when it is not possible to estimate the data. This means that in not all cases reported data is present to determine whether the promoted characteristics are attained. By means of choosing a reputable data provider, the risk of erroneous estimates is mitigated.

2. Actualisation of data

The Fund is rebalanced on a monthly basis. It is possible that the Fund's investments in between the rebalancing moments do not fully comply with the promoted characteristics.

(j) Due Diligence

VanEck has a due diligence process on the selection of index providers and service providers. The board of VanEck decides on the index selection and appointment of service providers which is prepared by the Portfolio Management Team. VanEck is responsible for monitoring the replication of the index and the service provider. VanEck's approach is to achieve and maintain the highest standards of integrity, reporting and internal control on all relevant environmental, social, and governance (ESG) matters, sustainability factors in its policies, practices, operational set-up and selection and monitoring of investments as well as identification and mitigation of ESG related risks. A more detailed description on the due diligence that VanEck carries out is available in the ESG Due Diligence Policy, which can be found at the following link: [Policies & Procedures | VanEck](#)

(k) Engagement policies

VanEck Shareholder Engagement Policy can be found [here](#).

(l) Designated reference benchmark

No reference benchmark is designated for the purpose of attaining the environmental or social characteristics promoted by this financial product.

FOR INVESTORS IN SWITZERLAND:

Representative in Switzerland:

FIRST INDEPENDENT FUND SERVICES AG, Klausstrasse 33, CH-8008 Zurich

Paying agent in Switzerland:

Helvetische Bank AG, Seefeldstrasse 215, CH-8008 Zurich

The Prospectus, the instrument of incorporation, the key information documents and the annual and semiannual reports of the Company are available free of charge from the Representative in Switzerland.