



VanEck New China UCITS ETF

Sustainability-related information pursuant to Art. 24 of Regulation (EU) 2022/2088 ("SFDR")

Product name: VanEck New China UCITS ETF

Legal entity identifier: 6354004UKGUQNC0ZOU60

ISIN: IE0000H445G8

a) Summary

VanEck New China 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 integrates ESG features in its passive investment process by means of ESG-related exclusions on the level of the benchmark replicated by the fund and through proxy voting on sustainability matters. The Fund does not have sustainable investment as its investment objective.

The Fund has a passive investment policy, whereby it replicates as closely as possible its reference benchmark and it invests in direct financial instruments, which are 100% aligned with the the environmental and social characteristics that it promotes. The fund aims to invest in 100 China-domiciled most fundamentally sound companies (being companies with good financial results based on an analysis of each company's income statements, statements of cash flows and balance sheets) with the most solid growth prospects in China's new economy sectors (Consumer Discretionary, Consumer Staples, Health Care and Technology) according to the MarketGrader methodology. The companies selected into the Index are compliant (above median performers) with Environmental, Sustainability and Governance (ESG) criteria based on the OWL Analytics consensus ESG Score. In addition, the Glass Lewis ESG-tilted voting policy is applied, whereby casted votes in shareholder meetings of companies in the portfolio concern sustainability matters.

The Fund's investments must comply with the following binding element: rank of companies above median, in terms of OWL Analytics consensus ESG score, which considers various Environmental, Human Rights, Labour and Governance indicators.

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 their OWL Analytics consensus ESG score, which includes KPIs "Board Effectiveness", "Management Ethics" and "Disclosure and Accountability".

b) No sustainable investment objective

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

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 controversies, by using OWL KPIs "Diversity & Rights", "Human Rights", "Management Ethics" and "Disclosure & Accountability" as part of the OWL Analytics consensus ESG score used in the index selection process.
 - Limiting exposure to carbon risk, by using OWL KPIs "Pollution Prevention" and "Resource Efficiency" as part of the OWL Analytics consensus ESG score used in the index selection process.
2. The Glass Lewis ESG policy guidelines are applied whereby votes are cast on sustainability matters.
3. A third-party engagement specialist - Glass Lewis Europe Limited - for the passive equity funds managed by VanEck Asset Management B.V. has been engaged. The engagement provider determines the engagement approach in accordance with its engagement policy and based on its engagements' priorities.

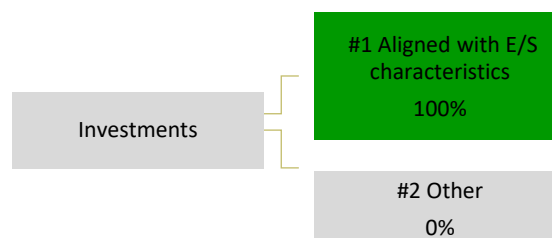
d) Investment strategy

The Fund's investment objective is to replicate, before fees and expenses, the price and yield performance of the MarketGrader New China ESG Index. The Fund seeks to invest in 100 China-domiciled most fundamentally sound companies (being companies with good financial results based on an analysis of each company's income statements, statements of cash flows and balance sheets) with the most solid growth prospects in China's new economy sectors (Consumer Discretionary, Consumer Staples, Health Care and Technology) according to the MarketGrader methodology. The companies selected into the Index are compliant (above median performers) with Environmental, Sustainability and Governance (ESG) criteria based on the OWL Analytics consensus ESG Score. In addition, the 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. The Fund screens companies based on their OWL Analytics consensus ESG score, which includes KPIs "Board Effectiveness", "Management Ethics" and "Disclosure and Accountability".

e) Proportion of investments

Fund invests in direct financial instruments of which 100% is aligned with the environmental and social characteristics that it promotes on the basis that all of the Index holdings are screened against its exclusion strategy.



f) Monitoring of environmental or social characteristics

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

The Fund promotes the reduction of the most negative impacts on society and the environment, by using by using OWL Analytics consensus ESG score used in the index selection process.

1. The Fund measures the following sustainability indicators:
 - The Total GHG Emissions (Scope 1+2+3) Mio EUR Enterprise Value.
 - This is monitored in the following manner:
 - The requirements relating to the OWL ESG score of constituents are included in the index rules which are defined by the index provider.
 - The index is rebalanced on a periodic basis by the index provider.
 - The Fund' Portfolio Management Team replicates the index based on the index rules.
 - Any breaches of the index rules are reported by the Legal and Compliance Team VanEck has policies in place to assess the alignment of the Fund's investments with the index and to undertake recovery measures where necessary.
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. An engagement approach with some of the underlying companies in accordance with Glass Lewis Europe Limited engagement policy and based on its engagements' priorities.
 - This is monitored in the following manner:
 - VanEck has appointed a service provider to exercise engagement. VanEck is periodically informed by the service provider on the engagement activities and has access to the related platform.

g) Methodologies

The screening of companies consists of a few 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 reporing can be found.

h) Data sources and processing

The data sources used

- ISS GHG Emissions data

The index provider and voting service provider may use their own additional data sources.

The measures taken to ensure data quality

The mentioned data sources are used by VanEck and/or its index provider and service provider. VanEck does not receive most of the data directly from data providers and therefore has not taken measures to ensure data quality

for the data which VanEck does not directly receive from data providers. For the data which VanEck does use directly from data providers, it uses a reporting service tool where data quality measures are integrated into. It is also relevant that the data used by the index provider and service provider is of sufficient quality. The index provider and service provider have set up their internal processes to do so. Data quality is a component of the selection process of the index provider

How data are processed

VanEck processes a limited amount of data on its own for the Fund. Data from data providers or the index provider is processed to measure the Fund's environmental and social characteristics based on the Fund's investments as per the end of the year. VanEck is periodically informed on the index construction, implementation, results and progress of the voting activities.

The proportion of data that are estimated

VanEck does not estimate data, but cannot rule out that the index provider or service provider does estimate data and/or use data provider which 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 providers, index provider and service 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 the index provider, VanEck and/or 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 index provider rebalances the index on a periodic 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 does not select investments but uses indices which are constructed by index providers. As described in the monitoring section, VanEck replicates the index and this is monitored by the Portfolio Management Team and the Legal and Compliance Team. 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

Furthermore, a third-party engagement specialist - Glass Lewis Europe Limited - for the passive equity funds managed by VanEck Asset Management B.V. has been engaged. The engagement provider determines the engagement approach in accordance with its engagement policy and based on its engagements' priorities. The VanEck Shareholder Engagement Policy can be found [here](#).

l) Designated reference benchmark

As a passive investments strategy, the Fund has designated the MarketGrader New China ESG as reference benchmark to meet the environmental and social characteristics that it promotes.

Sustainability factors are considered as part of the OWL Analytics consensus ESG score used for screening that is included in the reference benchmark and assessed at any rebalancing of the underlying Index. By means of this screening 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.

More product-specific information can be found on the website: <https://www.vaneck.com/ie/en/cnew>.