VanEck Emerging Markets Bond UCITS
Sustainability-related information pursuant to Art. 24 of Regulation (EU) 2022/2088 ("SFDR")

Product name: VanEck Emerging Markets Bond UCITS
Legal entity identifier: 635400ISUGLPAT8RP602

a) Summary

VanEck Emerging Markets Bond UCITS (the "Sub-Fund") has been categorised as Article 8(1) of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector ("SFDR"). The Sub-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 Sub-Fund actively integrates Environmental, Social, Governance factors in its investment process by means of ESG-related exclusions and its engagement policy. The Sub-Fund does not have sustainable investment as its investment objective.

The Sub-Fund is actively managed whereby portfolio corporates and sovereigns are evaluated by the Investment Manager and invests in direct financial instruments that are 100% aligned with the environmental and social characteristics that it promotes. The Sub-Fund's investment objective is to seek to seek long-term capital appreciation by investing in equity securities in emerging markets around the world. The Sub-Fund's investments must comply with the following binding elements:

1. Limiting exposure to companies, which are deemed ineligible according to the ISS norms-based research;
2. Limiting exposure to controversial business activities, by excluding companies deriving significant (>10%) revenues from fossil fuels, weapons, tobacco and pornography;
3. Limiting exposure to controversial business activities, such as production of coal or coal-based energy, nuclear weapons, tobacco and to controversies, such as severe environmental damage, unacceptable greenhouse gas emissions, violation of human rights, serious violations of individuals' rights in situations of war or conflict, particularly serious violations of fundamental ethical norms, gross corruption. Such companies are excluded from the portfolio based on the Norges Bank Exclusionary list;
4. Excluding companies, which are subject to warning. The warnings are the result of the assessment based on ESG data deriving from various ESG data providers.

Through its ESG-based exclusions the Sub-Fund considers several Principle Adverse Indicatiors, such as greenhouse gas emissions, fossil fuel, biodiversity, social and employee, respect for human rights, anti-corruption and anti-bribery matters. In addition, Engagement policy is an integral part of the investment process, whereby the manager actively engages with the issuers on the various ESG issues.

Moreover, good governance practices of the investee companies are assessed by excluding companies based on an ESG score, which allow an assess to poor governance and management. A strong emphasis is placed on the review of corporate governance by means of meetings with management, a thorough bottom-up research approach, as well as external research. Company visits and management meetings are a fundamental part of the

bottom-up research process. The Investment Manager also uses (industry) data from various data providers for screening of investments for material ESG factors, including corporate governance, in order to take those data into account when selecting the suitable investments for the portfolio.

b) No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

c) Environmental or social characteristics of the financial product

Environmental, social and governance ("ESG") factors are actively integrated in the Investment Manager's investment activities. The Sub-Fund is actively managed whereby portfolio corporates and sovereigns are evaluated by the Investment Manager.

The following environmental and social characteristics apply to the Sub-Fund's investments:

1. The Sub-fund promotes the reduction of the most negative impacts on society and the environment through:
    - Limiting exposure to corporates and sovereigns, which do not pass the screening tests on E, S and G components by the Investment Manager (step 2 of the investment process);
    - Limiting exposure to corporates, which are deemed ineligible according to the ISS norms-based research;
    - Limiting exposure to controversial business activities, by excluding corporates deriving significant (>10%) revenues from coal or coal-based energy, weapons and/or tobacco;
    - Limiting exposure to controversial business activities for corporates, such as production of coal or coal-based energy, nuclear weapons, tobacco and controversies, such as severe environmental damage, unacceptable greenhouse gas emissions, violation of human rights, serious violations of individuals' rights in situations of war or conflict, particularly serious violations of fundamental ethical norms, gross corruption. Such corporates are excluded from the portfolio based on the Norges Bank Exclusionary list.
2. The Engagement policy applies to the Sub-Fund, whereby active engagement with management is an integral component of the investment process.

d) Investment strategy

The Sub-Fund´s investment objective is to seek total return, consisting of income and capital appreciation. The Sub-Fund can invest in debt securities that are issued by governments, quasi-government entities or corporations in emerging markets countries. These securities may be denominated in any currency, including those of emerging markets. The Sub-Fund's benchmark (the "Index") is a blended index consisting of 50% J.P Morgan Emerging Markets Bond Index (EMBI) Global Diversified and 50% J.P. Morgan Government Bond Index-Emerging Markets (GBI-EM) Global Diversified. By investing in emerging markets debt securities, the Sub-Fund offers exposure to emerging markets fundamentals, generally characterized by lower debts and deficits, higher growth rates and independent central banks.

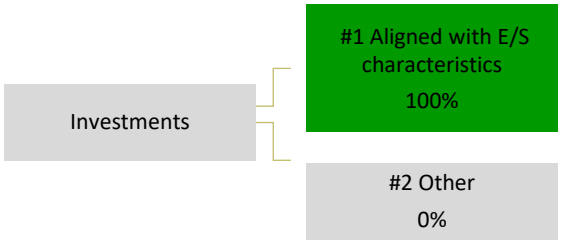
In addition, the Sub-fund actively integrates environmental, social and governance (ESG) factors in the investment process: norms-based research, controversial sector involvement screenings and data analysis are considered in the selection of investments included in the portfolio.

Good governance relates to sound management structures, employee relations, remuneration of staff and tax compliance and is analyzed in the Step 2 of the investment process. The Investment Manager also uses (industry)

data from various data providers for screening of investments for material ESG factors including governance, in order to take that data into account when selecting suitable investments for the portfolio.

e) Proportion of investments

The Sub-Fund invests in direct financial instruments, 100% of which are aligned with environmental and social characteristics that it promotes on the basis of screening and exclusionary strategy.



f) Monitoring of environmental or social characteristics

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

Environmental, social and governance ("ESG") factors are actively integrated in the Investment Manager's investment activities. The Sub-Fund is actively managed whereby portfolio corporates and sovereigns are evaluated by the Investment Manager.

1. The Sub-fund promotes the reduction of the most negative impacts on society and the environment.
   - This is measured with the following indicator(s):
     - Overall ESG rating of the portfolio
   - This is monitored in the following manner:
     - The Investment Manager has set up monitoring, management and compliance systems, in Bloomberg, among others, to prevent trading in companies that are on the exclusions list.
2. 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 Sub-Fund applies exclusions based on exposure to controversial sectors and activities and/or violations of international standards concerning specific norms, as per screening described above.

In addition, active engagement with investee companies is part of the investment process.

h) Data sources and processing

The data sources used

- ISS for data on company involvement in controversial sectors/activities;
- ISS screening for coal or coal-based energy, weapons and/or tobacco (applicable to corporates only);

- Norges Bank exclusion list for exclusion of companies (applicable to corporates only);
- RobecoSAM, Bloomberg ESG and MSCI (applicable to corporates only);
- World Bank ESG and from Yale University's Environmental Performance Index data (applicable to sovereigns).

The measures taken to ensure data quality
The mentioned data sources are used by VanEck and/or its service provider. VanEck does not receive most of the data directly from data providers and therefore has not taken measures to ensura 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 service provider is of sufficient quality. The service provider has set up their internal processes to do so.

How data are processed
VanEck processes a limited amount of data on its own for the Sub-fund. Data from data providers is processed to measure the Sub-fund's environmental and social characteristics based on the Sub-fund's investments as per the end of the year.

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 limitation 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 dataproviders 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.

j) Due Diligence

VanEck has a due diligence process on the selection of index providers and service provides. The board of VanEck decides on the appointment of service providers which is prepared by the Portfolio Management Team. VanEck is responsible for monitoring 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

As part of VanEck's bottom-up investment process, its active Investment Teams seek to meet, when possible, with investment management and representatives of debt issuers, prior to investing. Once the Active Funds invest in a company, VanEck seeks to continue to have regular dialogue with investment management and where relevant, raise ESG issues pertinent to that investment and industry. It may, for example, discuss a board's focus on ESG or, more specifically, an investment's environmental record, safety record, community engagement, energy and resource efficiency or labor relations. When VanEck raises ESG-related issues during these meetings it does so, among other reasons, in order not only to have a better understanding of goals and risks, but also to understand better, and advocate adherence to, best practices. In addition, VanEck tends to engage on such issues when asked to by companies or corporates themselves. The Investment Teams will monitor the principal adverse impacts reported on during the previous period and will consider the possibility of taking specific actions pertinent to that investment and industry, based on the report results.

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.