



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

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

a) Summary

VanEck Emerging Markets Equity UCITS ETF (het "Subfonds") is gecategoriseerd als artikel 8, lid 1, van Verordening (EU) 2019/2088 betreffende duurzaamheidsgerelateerde informatievoorziening in de financiële sector ("SFDR"). Het subfonds bevordert milieu- en/of sociale kenmerken en belegt in ondernemingen die goede praktijken op het gebied van ondernemingsbestuur volgen. Om elk van de bevorderde kenmerken te bereiken, integreert het subfonds ESG-kenmerken in het passieve beleggingsproces door middel van ESG-gerelateerde uitsluitingen, stemming bij volmacht over duurzaamheidskwesties en het betrokkenheidsbeleid. Duurzaam beleggen is geen beleggingsdoelstelling van het subfonds.

Het subfonds wordt actief beheerd, waarbij (potentiële) portefeuillebedrijven door de vermogensbeheerder worden beoordeeld. Het subfonds belegt in directe financiële instrumenten die voor 100% aansluiten bij de milieu- en maatschappelijke kenmerken die het voorstaat. De beleggingsdoelstelling van het subfonds is het streven naar een totaal rendement, bestaande uit inkomsten en vermogensgroei, door hoofdzakelijk te beleggen in obligaties uit opkomende markten.

De beleggingen van het subfonds moeten voldoen aan de volgende bindende elementen:

1. Beperking van de blootstelling aan ondernemingen en overheden die niet voldoen aan de screeningtests op de ESG-onderdelen door de vermogensbeheerder (stap 2 van het beleggingsproces);
2. Beperking van de blootstelling aan ondernemingen die volgens het op ISS-normen gebaseerde onderzoek niet in aanmerking komen;
3. Beperking van de blootstelling aan controversiële bedrijfsactiviteiten door ondernemingen uit te sluiten die aanzienlijke (>10%) inkomsten halen uit steenkool of energie uit steenkool, wapens en/of tabak;
4. Beperking van de blootstelling van ondernemingen aan controversiële bedrijfsactiviteiten, zoals de productie van steenkool of energie uit steenkool, kernwapens, tabak en controverses, zoals ernstige milieuschade, onaanvaardbaar hoge CO₂-uitstoot, schending van de mensenrechten, ernstige schendingen van de rechten van personen in oorlogs- of conflictsituaties, bijzonder ernstige schendingen van fundamentele ethische normen, grove corruptie. Dergelijke ondernemingen zijn uitgesloten van de portefeuille op basis van de uitsluitingslijst van Norges Bank.

Via de uitsluitingen op ESG-basis en het beleid voor het stemmen bij volmacht houdt het subfonds rekening met verschillende Principle Adverse Indicators, zoals de CO₂-uitstoot, fossiele brandstoffen, biodiversiteit, sociale en werknemersaangelegenheden, respect voor mensenrechten en anti-corruptie. Daarnaast is het betrokkenheidsbeleid een integraal onderdeel van het beleggingsproces, waarbij de beheerder actief in gesprek gaat met de uitgevers over de verschillende ESG-kwesties.

Bovendien heeft een goed ondernemingsbestuur betrekking op gezonde managementstructuren, de relatie met het personeel, de beloning van het personeel en de naleving van de belastingwetgeving. Dit wordt geanalyseerd in stap 2 van het beleggingsproces. De vermogensbeheerder gebruikt ook (industrie)gegevens van verschillende gegevensbronnen om de beleggingen te screenen op materiële ESG-factoren, zoals ondernemingsbestuur, zodat deze gegevens ook worden overwogen bij de selectie van geschikte beleggingen voor de portefeuille.

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 companies 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 companies, which are deemed ineligible according to the ISS norms-based research;
 - Limiting exposure to controversial business activities, by excluding companies deriving significant (>10%) revenues from fossil fuels, weapons, tobacco and pornography;
 - 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;
 - 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.
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 Sub-Fund’s investment objective is to seek long-term capital appreciation by investing in equity securities in emerging markets around the world. The Sub-Fund's benchmark is the MSCI Emerging Markets Investable Market Index (“MSCI EM IMI”). The Fund focuses on companies with potential for growth at a reasonable price (“GARP”). This strategy utilizes a bottom-up investment process driven by fundamental research into the sustainability of a company's growth drivers. Stock selection is oriented toward strong secular stories, many of which reflect domestic demand themes and are often found in smaller-capitalization stocks.

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 companies included in the portfolio.

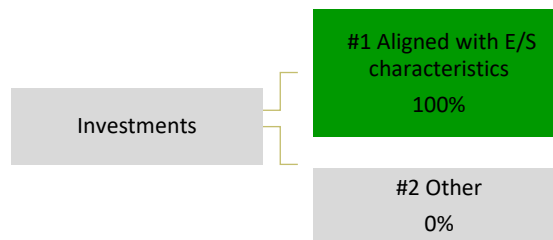
Glass Lewis ESG-tilted voting policy is applied, whereby votes are cast on sustainability matters in shareholder meetings of companies in the portfolio.

Good governance relates to sound management structures, employee relations, remuneration of staff and tax compliance. In its investment process, the Sub-Fund uses ESG scores to assess poor governance and management. A strong emphasis is placed on the review of corporate governance by means of meetings with management, a 360-degree 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.

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:

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;
 - The number of sustainability matters voted on in shareholder meetings.
 - 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 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 few components as described above.

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.

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;
- Norges Bank exclusion list for exclusion of companies;
- Bloomberg ESG, ISS, Refinitiv, Sustainalytics, MSCI and similar rating or data providers' raw data to assess the sustainability profile of the companies.

The 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 service provider is of sufficient quality. The service provider have 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. VanEck is periodically informed on the 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 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 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 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.

j) Due Diligence

VanEck has a due diligence process on the selection of service and data providers. 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 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.