VanEck Morningstar US ESG Wide Moat UCITS ETF
Sustainability-related information pursuant to Art. 24 of Regulation (EU) 2022/2088 ("SFDR")

Product name: VanEck Morningstar US ESG Wide Moat UCITS ETF
Legal entity identifier: 549300JHVM3IG26SW860
ISIN: IE00BQQP9H09

a) Summary

VanEck Morningstar US ESG Wide Moat 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 tracked 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 invests directly in the underlying equity securities of the Index, which are primarily listed on US stock exchanges.

The Fund's investments must comply with the following binding elements:

1. Exclusion based on severe controversies: controversy score must be 4 (out of 5) or lower through the trailing 3 years;
2. Exclusion based on high and severe ESG risk companies: ESG risk score must be <30;
3. Exclusion based on product involvement: tobacco (>0% revenues), controversial weapons (>0%), civilian firearms (>0%), thermal coal (>0%), oil and gas production / supporting products and services (>10%), oil and gas generation and coal power generation (>50% of combined revenue).

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

Moreover, Governance subjects are considered as part of the financial analysis in the index construction when evaluating companies' perceived fair value.Sustainalytics' Global Standards screening is based on the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, World Governance Indicators and industry-specific standards or initiatives. Governance factors such as Tax avoidance/evasion, Accounting Irregularities and Accounting Fraud, Lobbying and Public Policy, Insider Trading, Bribery and Corruption, Animal Welfare, Intellectual Property, Resilience, Remuneration, Shareholder disputes and rights, Board composition and other Corporate Governance and Business Ethics criteria are part of the Controversy Screening embedded in the fund's underlying index. Governance Factors also comprise a part of the aggregate ESG risk score, which is used in the index selection.

b) No sustainable investment objective

The Fund promotes environmental or social characteristics, but does not have 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:
    - Exposure to ESG risks is reduced by excluding companies with high or severe levels of ESG risks;
    - Exposure to controversies and controversial business activities is limited by means of of revenue-based screening and exclusion of companies involved in severe UNGC violations and other controversies.
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.

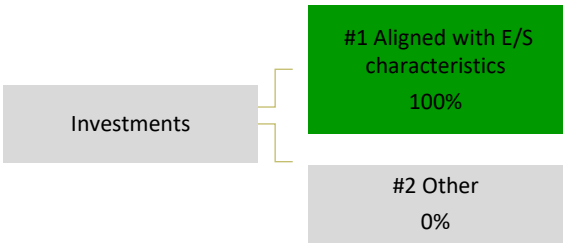
d) Investment strategy

The Fund replicates the overall performance (before fees and expenses) of the Morningstar® US Sustainability Moat Focus Index, which targets attractively priced US companies with sustainable competitive advantages according to Morningstar's equity research team, subject to ESG screening based on Sustainalytics data. In addition, an 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.Governance subjects are considered as part of the financial analysis in the index construction when evaluating companies' perceived fair value. Additionally, Sustainalytics' Global Standards screening is based on the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises, World Governance Indicators and industry-specific standards or initiatives.

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 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:

1. The Fund promotes the reduction of the most negative impacts on society and the environment.
    - This is measured with the following indicator(s):
        - The Total GHG Emissions (Scope 1+2+3) Mio EUR Enterprise Value;
        - The GHG Intensity (t CO2e/$M Revenue)
    - This is monitored in the following manner:
        - The requirements relating to the ESG risk score, violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and controversial sector involvement screenings (tobacco, controversial weapons, civilian firearms, thermal coal, oil and gas production / supporting products and services, oil and gas generation and coal power generation) 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 Limites 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 exact methodology of the integration of the Fund's environmental and/or social characteristics 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 for the assessment of the companies` performance

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 the data directly from data providers. With regards to the non-renewable energy production data VanEck utilizes a reporting service whereby calculations can be made in a tool developed by the data provider. Data quality measures are integrated into the reporting service tool. It is alsorelevant 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 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 index provider and the service provider. 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 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 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 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.

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 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 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 provides. 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

The financial product engagement is limited to dialogues with the index provider in further refining the index rules and can relate to the increasing consideration of sustainability factors in the composition of the index. The VanEck Shareholder Engagement Policy can be found here. 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.

l) Designated reference benchmark

As a passive investments strategy, the Fund has designated the Morningstar US Sustainable Moat Focus Index as reference benchmark to meet the environmental and social characteristics that it promotes. Sustainability factors are considered as part of screenings that are included in the reference benchmark and assessed at any rebalancing of the underlying Index. By means of ESG risk scores, Global Standards controversy ratings 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.

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