



VanEck Morningstar Developed Markets Dividend Leaders UCITS ETF
Sustainability-related information pursuant to Art. 24 of Regulation (EU) 2022/2088 ("SFDR")

Product name: VanEck Morningstar Developed Markets Dividend Leaders UCITS ETF

Legal entity identifier: 254900GQYEXN18KU7O94

ISIN: NL0011683594

(a) Summary

VanEck Morningstar Developed Markets Dividend Leaders UCITS ETF („Subfundusz”) został sklasyfikowany zgodnie z art. 8 ust. 1 Rozporządzenia (UE) 2019/2088 w sprawie ujawniania informacji związanych ze zrównoważonym rozwojem w sektorze usług finansowych („SFDR”). Subfundusz promuje cele środowiskowe i/lub społeczne oraz inwestuje w podmioty stosujące dobre praktyki w zakresie ładu korporacyjnego. Aby osiągnąć każdy z promowanych celów, Subfundusz uwzględnia zasady ESG w procesie pasywnego inwestowania poprzez zastosowanie wykluczeń ESG na poziomie odzwierciedlanego benchmarku oraz głosowanie pośrednie (przez pełnomocników) w kwestiach dotyczących zrównoważonego rozwoju. Celem Subfunduszu nie jest inwestowanie w sposób zrównoważony.

Subfundusz prowadzi pasywną politykę inwestycyjną, w ramach której jak najwierniej odwzorowuje swój benchmark referencyjny oraz dokonuje inwestycji w bezpośrednie instrumenty finansowe, które są w 100% dostosowane do promowanych przez niego celów środowiskowych i społecznych. Celem Subfunduszu jest dokonywanie inwestycji w 100 największych na świecie płatników wybieranych przy uwzględnieniu ich stopy dywidendy, odporności i potencjalnego wzrostu. Dodatkowo, gdy głosy oddawane na zgromadzeniach udziałowców/akcjonariuszy podmiotów z portfela dotyczą kwestii zrównoważonego rozwoju, stosuje się politykę głosowania zgodną z ESG.

Inwestycje Subfunduszu muszą spełniać następujące obowiązujące założenia:

1. nie mogą obejmować spółek z zerową oceną ryzyka ESG lub oceną kontrowersyjną.
2. Nie mogą obejmować spółek z kategorii poważnego ryzyka ESG.
3. Nie mogą obejmować spółek z oceną kontrowersyjności wyższą niż 4 (na 5).
4. Nie mogą obejmować spółek, które nie przestrzegają Zasad Global Compact ONZ (UNGC).
5. Nie mogą obejmować spółek, których zaangażowanie w następujące działania przekracza 0%:
 - a. produkcja wyrobów tytoniowych,
 - b. broń kontrowersyjna,
 - c. broń strzelecka do użytku cywilnego,
 - d. kluczowe elementy broni strzeleckiej.
6. Nie mogą obejmować spółek, których zaangażowanie w następujące działania przekracza 5%:
 - a. wydobywanie węgla energetycznego,
 - b. wytwarzanie energii z węgla energetycznego.

Przy zastosowaniu wykluczeń ESG oraz polityki głosowania przez pełnomocników Subfundusz uwzględnia szereg wskaźników Głównych Niekorzystnych Oddziaływań, takich jak kwestie społeczne i pracownicze, poszanowanie praw człowieka, przeciwdziałanie korupcji i łapówkarstwu.

Tematy związane z łaodem korporacyjnym są brane pod uwagę w ramach selekcji globalnych standardów Sustainalytics, która opiera się na zasadach Global Compact ONZ, wytycznych OECD dla przedsiębiorstw międzynarodowych, światowych wskaźnikach ładu korporacyjnego oraz standardach lub inicjatywach branżowych. Czynniki ładu korporacyjnego, takie jak unikanie/uchylanie się od opodatkowania, nieprawidłowości i oszustwa księgowe, lobbing (w tym polityczny), wykorzystywanie informacji poufnych, przekupstwo i korupcja, dobrostan zwierząt, własność intelektualna, odporność w warunkach niepewności, wynagrodzenia, spory i prawa udziałowców/akcjonariuszy, skład organów podmiotów, inne kwestie związane z łaodem korporacyjnym i etyką biznesową są objęte Przeglądem obszarów kontrowersyjnych w ramach indeksu bazowego funduszu. Czynniki ładu korporacyjnego są również uwzględniane w zbiorczej ocenie ryzyk ESG, która jest wykorzystywana przy wyborze indeksu.

(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

- The following environmental and social characteristics apply to the Sub-fund's investments:
 - a. Reduced exposure to ESG Risk by means of excluding companies with a severe levels of ESG Risk
 - b. Exposure to controversies and controversial business activities is limited by means of revenue-based screenings and exclusion of companies non-compliant with UNGC principles or involved in other controversial activities.
- The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.
- 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.

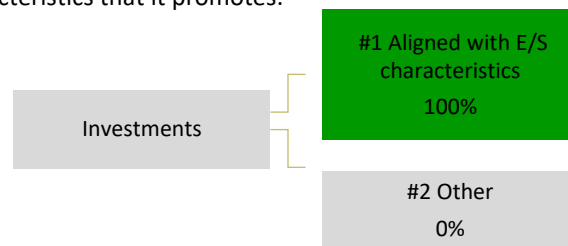
(d) Investment strategy

The Sub-fund's investment objective is to replicate, before fees and expenses, the price and yield performance of the Morningstar® Developed Markets Large Cap Dividend Leaders Screened Select IndexSM. The Sub-fund seeks to invest in the top 100 income payers globally, selected for their dividend yields, resilience and potential growth. In addition, the 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 Sustainalytics' Global Standards screening, which 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 Sub-fund invests in direct financial instruments of which 100% is aligned with the 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:

(a) The Sub-fund promotes the reduction of certain negative impacts on society and the environment.

- This is measured with the following indicator(s):
 - a. The percentage of portfolio with exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
 - b. The percentage of portfolio involved in violations of UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights.
- This is monitored in the following manner
 - a. The requirements relating to the ESG Risk rating, controversy ratings and Controversial sector involvement screenings (tobacco, coal, civilian firearms and controversial weapons) are included in the Index rules which are defined by the Index provider.
 - b. The index is rebalanced on a periodic basis by the index provider.
 - c. The Sub-fund' Portfolio Management Team replicates the index based on the index rules.
 - d. 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 Sub-fund's investments with the index and to undertake recovery measures where necessary.
 - e. VanEck has policies in place to assess the alignment of the Sub-fund's investments with the index and periodic reports are constructed on the replication of the index and whether the Sub-fund's portfolio is aligned with the index.

(b) The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.

- This is monitored in the following manner:
 - a. VanEck has appointed a service provider to exercise voting rights. VanEck is periodically informed by the service provider on the voting activities

(c) 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 methodology of the integration of the Sub-fund's environmental and/or social characteristics is determined by the index provider. More information can be found in the Sub-fund's index rules.

Voting is delegated to an independent third-party proxy voting specialist, Glass Lewis & Co., LLC.,. 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

- Institutional Shareholder ServicesISS;
- Glass Lewis data related to voting activities.

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 ofcourse 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 Sub-fund. Data from data providers or the index provider 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 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 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 index provider rebalances the index on a periodic basis. It is possible that the Sub-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 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

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. In addition, the VanEck Shareholder Engagement Policy can be found [here](#).

(l) Designated reference benchmark

As a passive investments strategy, the Sub-fund has designated the Morningstar® Developed Markets Large Cap Dividend Leaders Screened Select IndexSM 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 controversy and cluster munitions screening, the Sub-fund takes the principal adverse impacts on sustainability factors relating to UNGC violations into account.

More product-specific information can be found on the website: [VanEck Morningstar Developed Markets Dividend Leaders UCITS ETF | Documents](#).