



**VanEck European Equal Weight Screened UCITS ETF**  
**Pursuant to Art. 24 of Regulation (EU) 2019/2088 (“SFDR”)**

**Product name:** VanEck European Equal Weight Screened UCITS ETF  
**Legal entity identifier:** 2549008OCRQQWIJZNT48  
**ISIN:** NL0010731816

**(a) Summary**

VanEck European Equal Weight Screened 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 zijn passieve beleggingsproces door middel van ESG-gerelateerde uitsluitingen op het niveau van de door het subfonds gevolgde benchmark en door middel van stemming bij volmacht over duurzaamheidskwesties. Duurzaam beleggen is geen beleggingsdoelstelling van het subfonds.

Het subfonds voert een passief beleggingsbeleid, waarbij het zijn referentiebenchmark zo dicht mogelijk benadert en belegt in directe financiële instrumenten die 100% aansluiten bij de milieu- en sociale kenmerken die het voorstaat. Het subfonds is gericht op beleggingen in de 100 meest liquide bedrijven met de hoogste marktkapitalisaties in Europese ontwikkelde markten, die voldoen aan de Global Compact-principes voor verantwoordelijk bedrijfsgedrag van de Verenigde Naties.

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

- Uitsluiting van de portefeuille van bedrijven met een ernstige of zeer ernstige controversebeoordeling op basis van het op normen gebaseerde onderzoek, met betrekking tot milieu, mensenrechten, corruptie en arbeidsrechten;
- Uitsluitingen op basis van geverifieerde betrokkenheid bij vastgestelde controversiële wapens.
- Uitsluitingen op basis van productbetrokkenheid: alcohol (>5% omzet), dierproeven, militaire (>0%), civiele vuurwapens (>0%), gokken (>5%), GGO's (>0%), militaire uitrusting (>5%), pornografie (>5%), tabak (>0% van teelt en productie), pesticiden (> 5%), thermische steenkoolwinning (>5%), kernenergieproductie (>0%) en teerzanden (>5%).

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, biodiversiteit, water, afval, sociale en werknemersaangelegenheden, respect voor mensenrechten en anti-corruptie.

**(b) No sustainable investment objective**

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

#### **a) Environmental or social characteristics of the financial product**

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 the exposure to carbon risk, by excluding companies deriving (>0%) revenues from intensive farming;
  - minimizing the exposure to controversies and controversial business activities by means of revenue-based screening and exclusion of companies involved in severe controversies with regards to Environment, Human Rights and Business Behavior.
2. The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.

#### **(c) Environmental or social characteristics of the financial product**

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

3. The Sub-fund promotes the reduction of the most negative impacts on society and the environment, through:
  - limiting the exposure to carbon risk, by excluding companies deriving (>0%) revenues from intensive farming;
  - minimizing the exposure to controversies and controversial business activities by means of revenue-based screening and exclusion of companies involved in severe controversies with regards to Environment, Human Rights and Business Behavior.
4. The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.
5. 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.

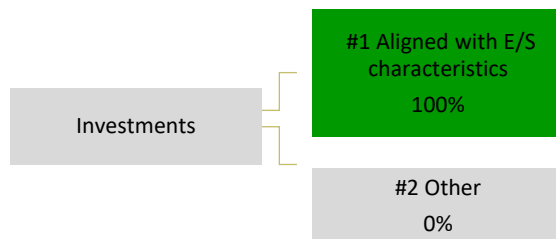
#### **(d) Investment strategy**

The Sub-fund's investment objective is to replicate, before fees and expenses, the price and yield performance of the Solactive European Equity Index. The Sub-fund seeks to invest in the 100 most liquid, most highly capitalised companies from European Developed Markets that comply with the UN Global Compact Principles for responsible corporate behavior. Additionally, it excludes sectors that do not follow responsible business practices, including: alcohol, animal testing, military, civilian weapons, gambling, pornography, tobacco, nuclear power.

Furthermore, the Glass Lewis ESG-tilted voting policy is applied, whereby casted votes in shareholder meetings of companies in the portfolio concern sustainability matters.

- (e) Good governance** relates to sound management structures, employee relations, remuneration of staff and tax compliance. The Sub-fund excludes companies with a severe or very severe controversy rating. The rating takes into account, among others, Accounting Fraud, Anti-competitive Behaviour, Bribery, Money Laundering, Failure to manage cybersecurity, Failure to pay fair share of taxes, Poor stakeholder consultation, Workplace discrimination, Labour Rights Violations, Working Conditions as well as Supply-Chain standards. **Proportion of investments**

The Sub-fund invests in direct financial instruments of which 100% is aligned with the E/S characteristics.



## (f) Monitoring of environmental or social characteristics

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

The Sub-fund promotes the reduction of the most negative impacts on society and the environment.

1. This is measured with the following indicator(s):
  - The total GHG Emissions (Scope 1+2+3) Mio EUR Enterprise Value;
  - The percentage of companies involved in severe controversies and controversial activities from the exclusion list
2. This is monitored in the following manner:
  - The requirements relating to the product involvement and controversy scores 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 Sub-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 Sub-fund's investments with the index and to undertake recovery measures where necessary.
  - 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.

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

3. 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.
4. 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 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 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.

## **(h) Data sources and processing**

The data sources used

Institutional Shareholder Services (ISS); 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 of course 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 Solactive European Equity 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 Controversy Risk Assessment and Controversial sector involvement screenings the Sub-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 information on the reference benchmark can be found on the website: <https://www.vaneck.com/nl/en/teet/documents/>.