



VanEck Sustainable Future of Food UCITS ETF
Sustainability-related information pursuant to Art. 37 of Regulation (EU) 2022/2088 ("SFDR")

Product name: VanEck Sustainable Future of Food UCITS ETF

Legal entity identifier: 25490018AUJGR6833G82

ISIN: IE0005B8WVT6

a) Summary

VanEck Sustainable Future of Food UCITS ETF (el «Fondo») ha sido incluido en la categoría del artículo 9, apartado 1, del Reglamento (UE) 2019/2088 sobre la divulgación de información relativa a la sostenibilidad en el sector de los servicios financieros («SFDR»). El Fondo tiene un objetivo de inversión sostenible, poniendo énfasis en los objetivos medioambientales: su objetivo es fomentar medios sostenibles de desperdicio de alimentos, seguridad alimentaria o medioambiental y, en última instancia, contribuir a la producción y el desarrollo sostenibles de alimentos. Contribuye a objetivos medioambientales que se ajustan a los objetivos de desarrollo sostenible (ODS) «Hambre cero», «Salud y bienestar», «Industria, innovación e infraestructura», «Ciudades y comunidades sostenibles», «Producción y consumo responsables», «Acción por el clima», «Vida submarina» y «Vida de ecosistemas terrestres». Con el fin de lograr el objetivo de inversión sostenible, el Fondo incorpora consideraciones de sostenibilidad en su proceso de inversión pasiva mediante la integración de características ASG, la exclusión relacionada con aspectos ASG y el voto delegado en cuestiones de sostenibilidad.

El Fondo tiene una política de inversión pasiva, por la que replica lo más fielmente posible su índice de referencia, e invierte en instrumentos financieros directos que son 100 % sostenibles. Las directrices de inversión del fondo no requieren una alineación definida específicamente con la taxonomía de la UE. VanEck Sustainable Future of Food UCITS ETF invierte en empresas cuyos ingresos proceden, al menos, en un 50 % (25 % para los componentes actuales) de los siguientes subtemas: (a) alternativas cárnicas, proteicas o lácteas de origen vegetal o cultivadas; (b) agricultura vertical o urbana (esto incluye empresas agrícolas que cultivan verticalmente o en invernaderos o que se especializan en la agricultura localizada); (c) agricultura de precisión (esto incluye equipos de riego y redes de agua inteligentes, equipos de invernadero, agricultura autónoma/robótica o equipos relacionados con la agricultura, pero no productos químicos agrícolas y semillas de plantas); (d) sabores alimentarios e ingredientes funcionales; (e) alimentos orgánicos o saludables (esto incluye alimentos envasados o productos agrícolas, pero no carne, aves, pescado o vitaminas). Además, también se incluyen empresas que obtienen, al menos, el 50 % (25 % para los componentes actuales) de sus ingresos de servicios o productos agrícolas (limitados a frutas, verduras, cereales y productos lácteos), o bien de productos alimenticios a base de plantas/cereales o lácteos envasados y cumplen determinadas normas ASG relacionadas con la sostenibilidad y seguridad alimentarias y agrícolas. El proveedor del índice utiliza los datos ASG proporcionados por ISS.

Además, se aplican determinadas exclusiones relacionadas con ASG de acuerdo con la metodología del índice para garantizar que las empresas no perjudiquen significativamente ningún otro objetivo de inversión sostenible medioambiental o social. Las evaluaciones tienen en cuenta:

1. Implicación en sectores controvertidos, por la que se evalúa la implicación de las empresas en:
 - Armas controvertidas: se aplica un umbral de ingresos del 0 %;
 - Minería de carbón térmico y arenas petrolíferas: se aplica un umbral de participación del 1 %;
 - Producción de tabaco y armas de fuego civiles: se aplica un umbral de ingresos del 0 %;
 - Combustibles fósiles, energía nuclear, equipamiento y servicios militares y juegos de azar: se aplica un umbral de ingresos del 5 %;

- Generación de energía a partir de petróleo y gas y generación de energía a partir de carbón: se aplica un umbral de ingresos del 50 % combinados. Los incumplimientos de las normas internacionales sobre, por ejemplo, derechos humanos, derechos laborales, riesgo medioambiental y soborno.

Basándose en su política de inversión temática centrada en la producción y el desarrollo sostenibles de alimentos, el Fondo tiene en cuenta varios indicadores de principales incidencias adversas, por ejemplo, las emisiones de gases de efecto invernadero, la biodiversidad, el agua, los residuos, los asuntos sociales y laborales, el respeto de los derechos humanos o la lucha contra la corrupción y el soborno. Además, se evalúan las prácticas de buena gobernanza de las empresas en las que se invierte y se excluyen empresas que infringen gravemente o muy gravemente las Líneas Directrices de la OCDE para Empresas Multinacionales.

b) No significant harm to the sustainable investment objective

This Financial product does not significantly harm any other environmental or social sustainable investment objective. By means of Norm-based research and Controversial sector involvement screenings, the Fund takes the Principal adverse impacts on 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. In addition, the Fund excludes companies when ISS rating shows the verifiably violated or imminent to violate the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

c) Sustainable investment objective of the financial product

The Fund aims at supporting sustainable Food Production and Development. Therefore, the Fund selects companies involved in food and agricultural technology, organic foods, or food companies that display high standards in food waste, food safety or environmental impact.

This includes companies with at least 50% (25% for current components) of their revenues from the following sub-themes:

(A) Plant-Based or Cultured Meat, Protein or Dairy alternatives;

(B) Vertical or Urban Farming - this includes agricultural companies that grow crops vertically, in greenhouses or specialize in localized farming;

(C) Precision Agriculture - this includes irrigation and smart water grid equipment, greenhouse equipment, or autonomous/robotic farming or agriculture-related equipment but excludes agricultural chemicals and plant seeds;

(D) Food Flavors and Functional Ingredients;

(E) Organic or Health Foods - this includes packaged foods, or agricultural products but excludes meat, poultry, fish or vitamins;

(F) In addition, companies that meet certain ESG standards related to food and agriculture sustainability and safety are also included as follows and referred to as sub-theme F. The Index Provider utilizes ESG data provided by ISS. Companies that are eligible under these conditions must derive at least 50% (25% for current components) of their revenues from agricultural services or agricultural products (limited to fruits, vegetables, grains and dairy), or packaged plant/grain-based or dairy food products.

d) Investment strategy

The Fund's investment objective is to replicate, before fees and expenses, the price and yield performance of the MVIS® Global Future of Food ESG Index. The Fund seeks to invest in companies generating revenues from products and services related to meat and dairy alternatives, organic foods, food flavors, or innovative agriculture technologies. Norm-based research and Controversial sector involvement screenings are performed in the

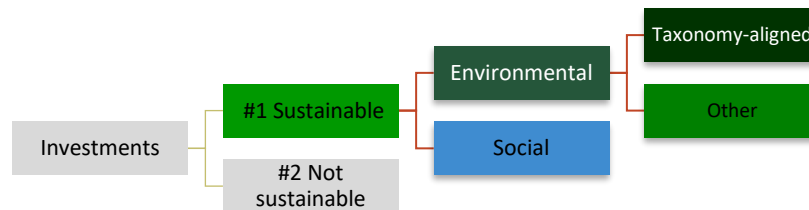
selection of companies in the index. In addition, the Glass Lewis ESG-tilted voting policy is applied whereby casted votes in shareholder meetings of companies in the portfolio concern sustainability matters.

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.

Good governance relates to sound management structures, employee relations, remuneration of staff and tax compliance. The Fund excludes companies when ISS rating shows the verifiably violated or imminent to violate the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

e) Proportion of investments

The Fund invests in direct financial instruments of which 100% is sustainable. All of these sustainable investments are environmentally sustainable.



f) Monitoring of sustainable investment objective

The sustainable investment objective is monitored in the following manner:

The Fund aims at supporting sustainable Food Production and Development. Therefore, the Fund selects companies involved in food and agricultural technology, organic foods, or food companies that display high standards in food waste, food safety or environmental impact. 1. The sustainable investment objective alignment is measured with the following indicator(s):

- The weighted percentage of investee companies' revenues derived from contribution to sustainable food production and development.
- The % 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. The target is 0% at rebalancing;
- The % of portfolio involved in the fossil fuels industry, which cannot be higher than 5% at rebalancing;
- The % of portfolio involved in non-renewable energy production.

2. This is monitored in the following manner:

- The requirements relating to the percentage of companies' revenues derived from the mentioned sub-themes, Norm-based research and Controversial sector involvement screenings (tobacco, fossil fuels, thermal coal mining, gambling, oil sands, civilian firearms, military equipment and services, and nuclear power) are included in the Index rules which are defined by the Index provider.
- Companies are screened for compliance with the Index rules and the Index is rebalanced on a periodic basis by the Index Provider.
- The Fund 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.

The Glass Lewis ESG tilted voting policy is applied, whereby casted votes concern sustainability matters.¹. 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.

An engagement approach with some of the underlying companies in accordance with Glass Lewis Europe Limited 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 screening of companies consists of a few components as described above. The exact methodology of the Fund's sustainable investments objective 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 reporting can be found.

h) Data sources and processing

The data sources used

1. ISS for global norms, revenue exposure and controversial weapons involvement screenings through the index provider
2. Investee companies' revenues derived from Food Production and Development through the index provider.
3. ISS for data on company involvement in non-renewable energy production.
4. Glass Lewis data related to voting activities

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. 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 also 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 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 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 sustainable investment objective, data from external data providers is used by the index provider, VanEck and/or 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 sustainable investment objective 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 do not fully comply with the sustainable investment objective in between the fund rebalancing moments.

j) Due diligence

VanEck does not select investments, but uses indices which are constructed by index providers. As described in the monitoring section, The Fund 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 selection of an index or service provider. The proposal for an index or service provider is prepared by the Portfolio Management Team. VanEck is responsible for monitoring the replication of the index and the service provider.

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) Attainment of the sustainable investment objective

As passive investments strategy, the Fund has designated its underlying index, the MVIS® Global Future of Food ESG Index, as reference benchmark to meet the sustainable investment objective.

Sustainability factors are considered as part of screenings which are included in the reference benchmark. By means of Norm-based research 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 information on the reference benchmark can be found [here](#).