

VanEck - Integration of Sustainability Risks

This document describes the integration of sustainability risks for VanEck's UCITS ETFs ("ETFs") under Section I. and VanEck's actively managed UCITS ("Active Funds") under Section II.

Sustainability Risks

'Sustainability risk' is defined as any environmental, social, or governance (ESG) event or condition that, if it occurs, could have a material negative impact on the value of an investment, either actual or potential¹:

- Environmental risks: risks arising from a negative impact on the environment, due to e.g., the greenhouse gas emissions a company produces, its waste of water or its impact on biodiversity.
- Social risks: consider risks related to negative factors such as lack of policies that address inequalities in the workplace or which address diversity and inclusion..
- Governance risks: refer to risks associated with weak governance structures, covering a range of matters including, but not limited to, board composition, executive compensation, or shareholder rights.

Sustainability risks can arise in many different forms. With regards to the climate risk, for example, this includes both transition risks and physical risks, whereby transition risks can be divided into legal and regulatory risks, technological risks, market risks and reputational risks. In addition, the impact of sustainability risks has various scopes, including company-specific, sector-specific and country-level. The occurrence of a sustainability risk can result in other (financial) risks manifesting. This can negatively affect the value of an investment.

With the increasing of data availability on ESG issues, new sustainability risks are likely to be identified. The mitigation of sustainability risks should translate into a company's differentiated financial performance and may have an impact on valuation. The European legislation has also created standards regarding the integration of sustainability risks in the investment process. Therefore, the approach to sustainability risks is described in this document for the EU-domiciled UCITS managed by VanEck.

Environmental, social and governance factors can affect the investments of the ETFs and Active Funds, both positively and negatively. Therefore, VanEck is committed to taking ESG risks and opportunities into account in its investment policy. ESG incorporation differs across asset classes and investment strategies under consideration. For ETFs, VanEck manages sustainability risks in different ways. Therefore, we explain how VanEck integrates ESG risks and opportunities in its investment strategies. For Active Funds, VanEck has the discretion to integrate ESG factors in its investment processes.

VanEck currently applies the following ESG integration measures to its ETFs and Active Funds:

Exclusions

Exclusions required by international laws and treaties apply to all funds offered in the EU. For example, VanEck does not invest in companies if this is prohibited by sanctions of the European Union, United Nations or the Office of Foreign Assets Control of the United States.

¹ Article 2(22) SFDR: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R2088>.

Proxy Voting

As one way of realizing its duty as a responsible active investor, VanEck seeks to consider ESG factors when voting securities owned by the clients for which it has been delegated voting authority. Generally, VanEck intends to vote proxies in accordance with applicable rules and regulations, with the support of an independent third party proxy voting specialist, Glass Lewis Europe Limited/Glass Lewis & Co., LLC. Proxy voting is applied to all equity strategies. The ESG specific proxy voting policy (the Glass Lewis ESG-tilted voting policy), which takes also Environmental, Social and Governance factors into account when casting votes, applies to all equity ETFs.

Engagement

Active engagement is an important element of both VanEck's investment philosophy and processes. Please see more information on Engagement in the below sections.

Section I. Approach for ETFs

The integration of sustainability risks for ETFs is based on the relevant index methodology. In principle, funds with a passive investment policy aim to replicate the index as closely as possible. If the relevant index has no specific sustainability characteristics, neither does the ETF.

For several of the indices used by VanEck, sustainability risks are reflected in their composition by means of applying an ESG screening. Depending on the index, the screening can consist of one or more elements such as screening for activities in controversial sectors, sustainability factors based on ESG scores, carbon footprint, violations of UN Global Compact principles concerning human rights, labor rights, anti-bribery, biodiversity and environmental pollution. Companies are screened on a periodic basis. Companies no longer satisfying the requirements are replaced. Detailed information on how ESG factors and ESG-based exclusions are applied and what data are used to conduct the related screenings and checks is available in the ETFs' relevant Index Guides and Benchmark Statements or in the ETFs' relevant documentation at www.vaneck.com.

Furthermore, VanEck has implemented an ESG Committee that is tasked with the ongoing monitoring of the sustainability profiles and results. Based on its monitoring activity VanEck may actively engage with index providers to increase the sustainability profiles of their indices.

Engagement

As of 2024, Glass Lewis Europe Limited has been appointed third-party engagement specialist, for the passive equity funds managed by VanEck Asset Management B.V. This partnership aligns with VanEck's sustainability policy, as Glass Lewis applies its expertise and engagement priorities to determine the approach in accordance with its engagement policy. By engaging Glass Lewis, VanEck reinforces its commitment to sustainable practices through a structured, policy-driven engagement approach.

Section II. Approach for Active Funds

VanEck incorporates sustainability risks and opportunities in the investment decisions for the actively managed funds through product-specific ESG integration and engagement efforts.

Financially material ESG factors are integrated into the investment process. This means that ESG issues can affect target prices, the fundamental assessment of a company or country and/or the portfolio construction methodology. For VanEck's active equity and bond strategies, sustainability risks are integrated into the

evaluation process for the investments at the moment of decision-making and during continuous monitoring. ESG practices can give an indication of an investment's medium- to long-term performance. VanEck assesses ESG risks and opportunities by conducting research on investee companies, corporates and governments. ESG factors are assessed by looking for both negative proscription and positive progression. External resources such as ISS, Refinitiv, Bloomberg ESG and further rating, research and data providers are used. The method of ESG integration differs across asset classes and is described below:

- **VanEck Emerging Markets Equity UCITS**

Given VanEck's bottom-up, fundamental and research-driven approach to investing, ESG risks and opportunities are integrated into analysis as it pertains to an investment in an issuer. Prior to and during the investment period, VanEck assesses ESG factors by conducting fundamental and bottom-up research on the investee companies. Issuer analysis may include a consideration of fundamental and quantitative elements such as business model and its sustainability, revenue and costs (including capital expenditure (Capex)), financial position, capital structure, regulatory risk, among others. It involves also qualitative and non-financial elements, including company's approach and/or industry relative standing to ESG issues and consideration of sustainability risks. Companies that have a substantially lower ESG score than their peers in the same industry or on a portfolio level may not be shortlisted for investment by the fund.

Detailed information on how ESG factors and ESG-based exclusions are applied and what data are used to conduct the related screenings and checks is available in the Active Fund's relevant documentation at www.vaneck.com.

- **VanEck Emerging Markets Bond UCITS**

Given VanEck's bottom-up, fundamental and research-driven approach to investing, ESG risks and opportunities are integrated into analysis as Step 2 of the investment process. The Investment Manager employs a proprietary investment process that aims to 1) find the cheapest bonds by comparing normalised fundamental data to risk premia, and 2) test for risks that are non-systematic.

- Step 1 - Valuation: the ultimate result of Step 1 is a list of bonds in order of their cheapness, without reference to whether they are local, hard, sovereign or corporate.
- Step 2 - Screening and Engagement: the screening tests allows VanEck to revisit and adjust the weights in the initial portfolio that comes out of Step 1. ESG factors are fully integrated into Step 2 of the investment process. The tests are based on qualitative and quantitative inputs and are regularly applied and documented. Failed test scores can result in rejection of an investment from the portfolio. During this step, the Investment Manager assigns E, S, and G scores for each corporate and sovereign in the portfolio. Scores can change at any time and are recorded every two weeks. The E, S, and G scores incorporate third-party ESG scores. The final score assigned by the Investment Manager is based on its proprietary incorporation of these scores, but also based on their interaction with the issuers itself, as well as other sources listed below. Engagement is integral to this Active Fund. During the investment period, VanEck engages with management and raises sustainability issues relevant to the related investment. The Investment Manager continues to engage with and monitor the investments throughout the investment cycle.

Detailed information on how ESG factors and ESG-based exclusions are applied and what data are used to conduct the related screenings and checks is available in the Active Fund's relevant documentation at www.vaneck.com.

- **VanEck Global Resources UCITS**

For investments in hard assets, particular attention is paid to health, safety, security and environment ("HSSE") in the investment analysis, not least since a strong HSSE record can correlate with strong operating

performance.

Detailed information on ESG integration is available in the Active Fund's relevant documentation at www.vaneck.com.

Engagement

Company engagement is integral to the investment activities for the Active Funds. Prior to and during the investment period, the investment teams engage with company managements and raise sustainability issues relevant to those companies and/or industries. The investment teams continue to engage with and monitor companies throughout the investment cycle. The policy can be found [here](#).