



**VanEck Semiconductor UCITS ETF UCITS ETF**  
**Sustainability-related information pursuant to Art. 24 of Regulation (EU) 2022/2088 ("SFDR")**

**Product name:** VanEck Semiconductor UCITS ETF  
**Legal entity identifier:** 2549005YADH8Q7K3ON79  
**ISIN:** IE00BMC38736

**a) Summary**

VanEck Semiconductor 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 invests in direct financial instruments that are 100% aligned with the the environmental and social characteristics that it promotes. The fund aims to invest in companies that generate at least 50% of their revenues from semiconductors and are primarily engaged in the production of semiconductors and semiconductor equipment.

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

1. Exclusion of companies with a very severe controversy rating relating to Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights, based on Norm-based research;
2. Exclusion of companies which derive 5% or more revenues from involvement in Tobacco, Thermal Coal, Fossil Fuels, Oil Sands, Nuclear, Civilian Firearms and Military or any revenues from involvement in controversial weapons, based on Controversial sector involvement screenings.

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

Moreover, good governance practices of the investee companies are assessed by excluding companies from the portfolio, which violate the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights or which have very severe controversy ratings.

**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:
  - Reducing exposure to very severe controversies relating to international standards on responsible business, human rights and labour rights. Minimizing exposure to controversial business activities relating to tobacco, controversial weapons, energy extractives, civilian firearms and military.
  - Limiting exposure to carbon risk by excluding companies deriving significant (>5%) revenues from energy extractives, such as thermal coal.
2. The Glass Lewis ESG policy guidelines are applied whereby votes are cast on sustainability matters.

**d) Investment strategy**

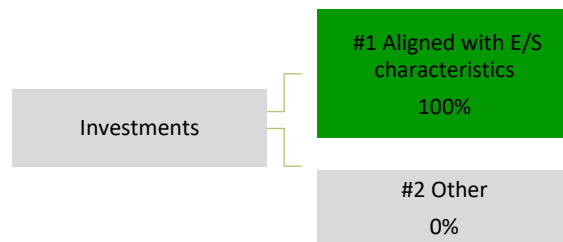
The Fund’s investment objective is to replicate, before fees and expenses, the price and yield performance of the MVIS® US Listed Semiconductor 10% Capped ESG Index. The Fund seeks to invest in US-listed companies generating at least 50% of their revenues from semiconductors. The underlying Index contains only companies that are engaged primarily in the production of semiconductors and semiconductor equipment. Norm-based research and Controversial sector involvement screenings are performed in the selection of companies included 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 they 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 aligned with the 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 % 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
  - This is monitored in the following manner:
    - The requirements relating to 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.
    - 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 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.

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 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 hydrogen and fuel cell projects 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 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 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 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 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**

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 MVIS® US Listed Semiconductor 10% Capped ESG 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 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 product-specific information can be found on the website: <https://www.vaneck.com/ie/en/smh>.