

## Annex 2

### Periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: VanEck Video Gaming and eSports UCITS ETF

Legal entity identifier: 6354004UKGUQNCOZOU60

## Environmental and/or social characteristics

### Did this financial product have a sustainable investment objective?

Yes

It made **sustainable investments with an environmental objective**: \_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective**: \_\_\_%

No

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

The following environmental and social characteristics applied to the Fund's investments:

1. Reducing exposure to very severe controversies relating to international standards on responsible business, human rights and labour rights, via exclusions based on the Norm-based research

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

2. Minimizing the exposure to controversial business activities relating to tobacco, controversial weapons, energy extractives, civilian firearms and military, based on the ESG provider research on revenues
3. Limiting the exposure to carbon risk by excluding companies deriving significant (>5%) revenues from certain sectors and energy extractives, such as thermal coal.
4. The Glass Lewis ESG policy guidelines was applied, whereby votes were cast on sustainability matters.

The performance of the Fund's environmental and social characteristics has been measured with the sustainability indicators included in the next question.

A reference benchmark, MarketVector™ Global Video Gaming & eSports ESG Index, has been designated for the purpose of attaining the environmental and social characteristics promoted by the financial product.

● ***How did the sustainability indicators perform?***

The sustainability Indicators performed as below:

<b>Indicator</b>	<b>Score</b>
The percentage of portfolio involved in violation of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights	0.00%
The percentage of portfolio involved in the fossil fuels industry	0.00%
The percentage of portfolio involved in non-renewable energy production	0.00%

● ***...and compared to previous periods?***

Sustainability indicators of the fund remained unchanged at 0%.

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

This question and the related questions below were not applicable as the Fund did not intend to make sustainable investments during the reporting period.

● ***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable.

- *How were the indicators for adverse impacts on sustainability factors taken into account?*

Not applicable.

- *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable.



## How did this financial product consider principal adverse impacts on sustainability factors?

The Fund considered the following principal adverse impacts on sustainability:

1. Greenhouse Gas (GHG Emissions):
  - Part of Norm-based research on environmental protection "Failure to mitigate climate change impacts", which comprises the Controversy Score used in the selection process. Companies with very severe controversies score were excluded from the selection process.
  - Fossil Fuel/Coal exclusions - Total Maximum Percentage of Revenues is 5%: This factor provides the maximum percentage of recent-year revenues for issuer's total involvement in coal/fossil fuel, including any exposure in Production, Exploration, Distribution, and Services.
2. Biodiversity
  - Part of Norm-based research on environmental protection "Failure to prevent depletion of biodiversity" and "Failure to prevent deforestation / illegal logging", which comprises the Controversy Score used in the selection process. Companies with very severe controversies score were excluded from the selection process.
3. Water
  - Part of Norm-based research on environmental protection "Failure to prevent depletion of biodiversity", "Failure to prevent water pollution" and "Failure to prevent oil spill", which comprises the Controversy Score used in the selection process. Companies with very severe controversies score were excluded from the selection process.
4. Waste
  - Part of Norm-based research on environmental protection "Poor waste management", "Poor nuclear safety", "Failure to prevent pollution" and "Failure to mitigate the production / distribution of hazardous substances", which comprises the Controversy Score used in the selection process. Companies with very severe controversies score were excluded from the selection process.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

5. Social and employee, respect for human rights, anti-corruption and anti-bribery matters
- ISS norms based screening covers controversial practices that have adverse impacts on society and the environment in line with established expectations for Responsible Business Conduct as set forth in the core normative framework consisting of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights, all of which are embedded in the Sustainable Development Goals.
  - Part of Norm-based research on Human Rights, including "Failure to conduct human rights due diligence" and "Failure to provide equal pay for work of equal value", which comprises the Controversy Score used in the selection process. Companies with very severe controversies score were excluded from the selection process.
  - Controversial weapons screenings are performed whereby companies with a RED exposure score in anti-personnel mines, biological and chemical weapons, cluster munitions, depleted uranium, incendiary weapons, white phosphorus and nuclear weapons are excluded from the index.

Companies for which there is no data available on one or more screening components do not constitute a violation of environmental or social objectives on that specific screening component. As of December 2023 rebalancing, no companies which were not covered by the ESG data provider, were included in the Index.

Additionally, principal adverse impacts are considered as part of the Glass Lewis ESG tilted voting policy, whereby votes are casted regard the environment, energy efficiency, the use of renewable energy sources, enhancing the rights of workers, violation of international human rights standards, gender pay inequity and board diversity.



## What were the top investments of this financial product?

As of 31/12/2023:

The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: 2023.

Security Name	Weight	Sector	Currency	Country
ADVANCED MICRO DEVICES INC	8.39	Information Technology	USD	US
NVIDIA CORP	8.27	Information Technology	USD	US
TENCENT HOLDINGS LTD	7.19	Communication Services	HKD	CN
NINTENDO CO LTD	6.88	Communication Services	JPY	JP
UNITY SOFTWARE INC	5.55	Information Technology	USD	US
ELECTRONIC ARTS INC	5.21	Communication Services	USD	US
NETEASE INC	5.18	Communication Services	USD	CN
ROBLOX CORP	4.89	Communication Services	USD	US
TAKE-TWO INTERACTIVE SOFTWARE INC	4.86	Communication Services	USD	US
ARISTOCRAT LEISURE LTD	4.51	Consumer Discretionary	AUD	AU

SEA LTD	4.49	Communication Services	USD	TW
BANDAI NAMCO HOLDINGS INC	4.4	Information Technology	JPY	JP
APPLOVIN CORP	3.79	Information Technology	USD	US
CAPCOM CO LTD	3.53	Communication Services	JPY	JP
MICRO-STAR INTERNATIONAL CO LTD	3.38	Information Technology	TWD	TW

● **What was the proportion of sustainability-related investments?**

100% of the portfolio was deemed to be constituted by sustainability-related investments, according to the definition given of promoting environmental and social characteristics.

● **What was the asset allocation?**

The Fund invests in direct financial instruments of which 100% was aligned with the environmental and social characteristics that it promotes on the basis that all of the Index holdings are screened against its exclusion strategy.

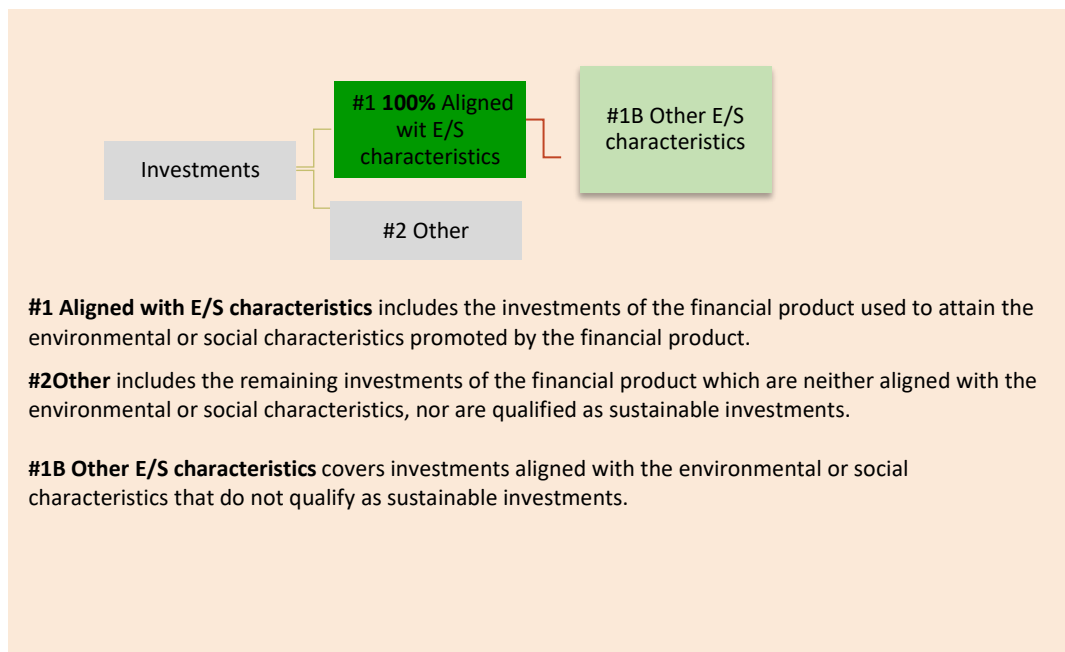


**Asset allocation**

describes the share of investments in

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon

● **In which economic sectors were the investments made?**

As of 31/12/2023 the assets were allocated to the following sectors:

Sector Weighting	% of Net Assets
Communication	
Services	58.92
Information	
Technology	29.53
Consumer	
Discretionary	11.48
Other/Cash	0.07



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%. The Fund did not intend to make sustainable investments with an environmental objective aligned with the EU Taxonomy during the reporting period. During the reporting period a limited amount of companies has reported on Taxonomy-alignment.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?**

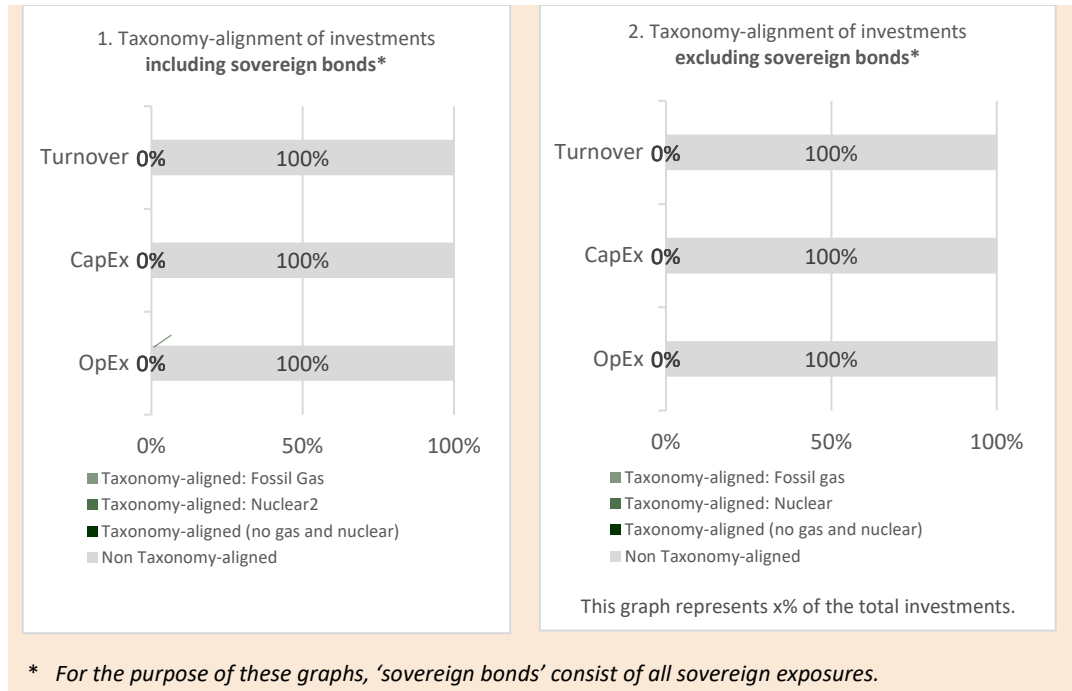
Yes

In fossil gas  In nuclear gas

No

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



- **What was the share of investments made in transitional and enabling activities?**  
The minimum share of investments in transitional and enabling activities was 0%.
- **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**  
0%. The Fund did not intend to make sustainable investments with an environmental objective aligned with the EU Taxonomy during the reporting period. During the reporting period a limited amount of companies has reported on Taxonomy-alignment.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

Not applicable. The Fund did not intend to make environmental sustainable investments.



**What was the share of socially sustainable investments?**

Not applicable. The fund did not intend to make socially sustainable investments.



**What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?**

Not applicable, all investments were aligned with the environmental and social characteristics.



are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under Regulation (EU) 2020/852.



### **What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

Companies have been screened for compliance with the Index rules and the Index is rebalanced on a quarterly basis by the Index Provider. The Fund replicates the Index based on the Index rules.

No breaches of the index have occurred.

Furthermore, the European ESG Committee has performed a review and reported on the alignment of the environmental and social characteristics of the Fund.



### **How did this financial product perform compared to the reference benchmark?**

As a passive investments strategy, the Fund has replicated the reference sustainable benchmark in order to be aligned with the sustainable investment objective.

- ***How does the reference benchmark differ from a broad market index?***

The index differs from a generic broad market index in following ways:

- Thematic investment approach: companies that generate at least 50% (25% for current components) of their revenues from video gaming & eSports.
- ESG screenings: Companies with very severe norms violations, the ones that have greater than 0% revenue exposure to controversial weapons, or that exceed certain thresholds of revenue exposure to various sectors including but not limited to civilian firearms, tobacco, and energy extractives are not eligible for inclusion.
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- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

The Fund aimed at investing 100% in line with its reference benchmark and will for that reason normally have very similar performance on sustainability indicators as the reference benchmark: MarketVector™ Global Video Gaming & eSports ESG Index. The European ESG Committee has analysed and confirmed the alignment of the reference benchmark with its promoted environmental or social characteristics.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



● **How did this financial product perform compared with the reference benchmark?**

<b>Indicator</b>	<b>Fund:</b>	<b>Reference benchmark:</b>
	VanEck Video Gaming and eSports UCITS ETF	Solactive GBS Global Markets Large & Mid Cap Index
The percentage of portfolio involved in violation of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights	0.00%	0.00%
The percentage of portfolio involved in the fossil fuels industry	0.00%	0.00%
The percentage of portfolio involved in non-renewable energy production	0.00%	0.00%

● **How did this financial product perform compared with the broad market index?**

<b>Indicator</b>	<b>Fund:</b>	<b>Broad market index:</b>
	VanEck Video Gaming and eSports UCITS ETF	Solactive GBS Global Markets Large & Mid Cap Index
The percentage of portfolio involved in violation of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights	0.00%	5.55 %
The percentage of portfolio involved in the fossil fuels industry	0.00%	11.65%
The percentage of portfolio involved in non-renewable energy production	0.00%	2.63%