

## Annex 6

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 Space Innovators UCITS ETF

Legal entity identifier: 254900JLBZ0X9ALOJI86

**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

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

## 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**



### 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 Product's investments:

1. The Product promoted the reduction of the most negative impacts on society and the environment through:
  - Minimizing exposure to very severe controversies relating to international standards on responsible business, human rights and labour rights is reduced

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

- Exposure to controversial business activities relating to tobacco, controversial weapons, energy extractives and civilian firearms.
  - 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 was applied, whereby votes were cast on sustainability matters.
  3. A third-party engagement specialist - Glass Lewis Europe Limited – has been engaged for the passive equity funds managed by VanEck Asset Management B.V. The engagement provider determines the engagement approach in accordance with its engagement policy and based on its engagements' priorities.

A reference benchmark, MVIS® Global Space Industry 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 Product measured the following sustainability indicators:

Indicator	Score
The percentage 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	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?***

Indicator	2024	2023	2022
The percentage 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	0.00%	0.00%	0.00%
The percentage of portfolio involved in the fossil fuels industry	0.00%	0.00%	0.00%
The percentage of portfolio involved in non-renewable energy production	0.00%	0.00%	0.00%

- ***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 corresponding questions below were not applicable as the Product 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.



**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.

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

The Product considered the following principal adverse impacts on sustainability factors:

1. Greenhouse Gas (GHG Emissions):
  - Part of Norm-based research on environmental protection "Failure to mitigate climate change impacts"
  - 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"
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"
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"
- 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"
  - 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.

Additionally, principal adverse impacts are considered as part of the Glass Lewis ESG tilted voting policy, whereby casted votes 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.



The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 2024.

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

As of 31/12/2024:

Security Name	Weight (%)	Sector	Currency	Country
Rocket Lab Usa Inc	8.58	Industrials	USD	US
Ast Spacemobile Inc	7.04	Communication Services	USD	US
Intuitive Machines Inc	6.89	Industrials	USD	US
Iridium Communications Inc	6.59	Communication Services	USD	US
Echostar Corp	6.24	Communication Services	USD	US
Wistron Neweb Corp	5.62	Information Technology	TWD	
Globalstar Inc	5.50	Communication Services	USD	US
Mda Ltd	5.43	Industrials	CAD	CA
Hanwha Aerospace Co Ltd	4.71	Industrials	KRW	
Planet Labs Pbc	4.44	Industrials	USD	US
Hexcel Corp	4.37	Industrials	USD	US
Sky Perfect Jsat Holdings Inc	4.36	Communication Services	JPY	JP
Melrose Industries Plc	4.25	Industrials	GBP	GB
Ses Sa	4.18	Communication Services	EUR	LU
Ducommun Inc	2.82	Industrials	USD	US

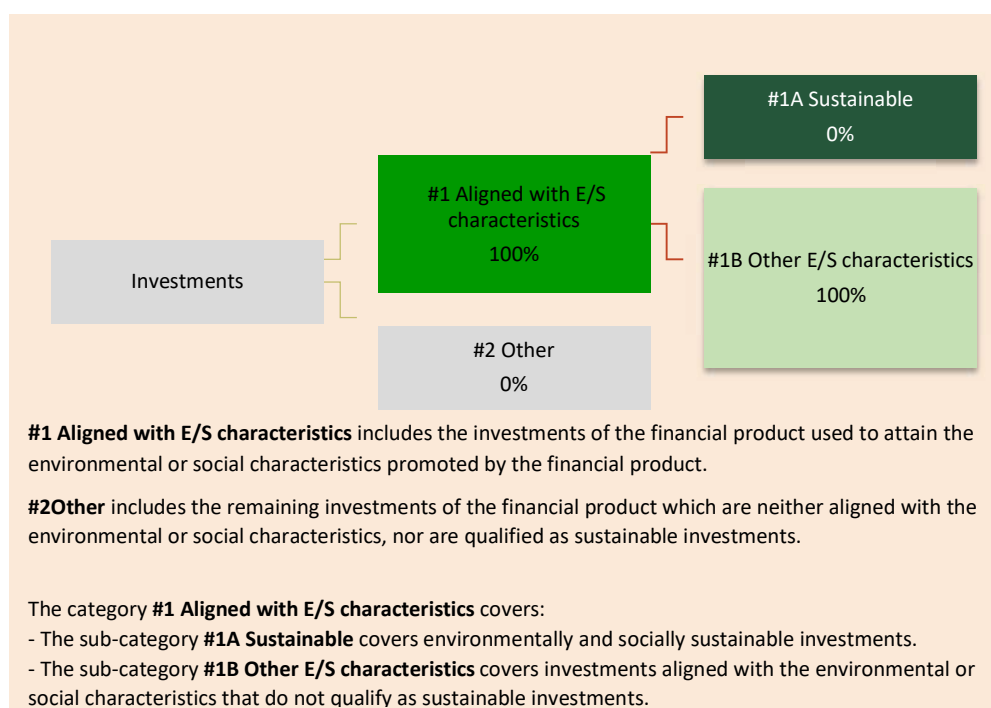


## What was the proportion of sustainability-related investments?

The Product has invested in direct financial instruments of which 100% was 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.

### ● **What was the asset allocation?**

The Product has invested in direct financial instruments of which 100% were aligned with the promoted environmental or social characteristics.



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.

### **Asset allocation**

describes the share of investments in specific assets.

- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.

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

As of 31/12/2024:

Sector	Weight (%)
Industrials	48.34
Communication Services	39.83
Information Technology	11.78
Other/Cash	0.05

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 alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



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

0%. The Product 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.

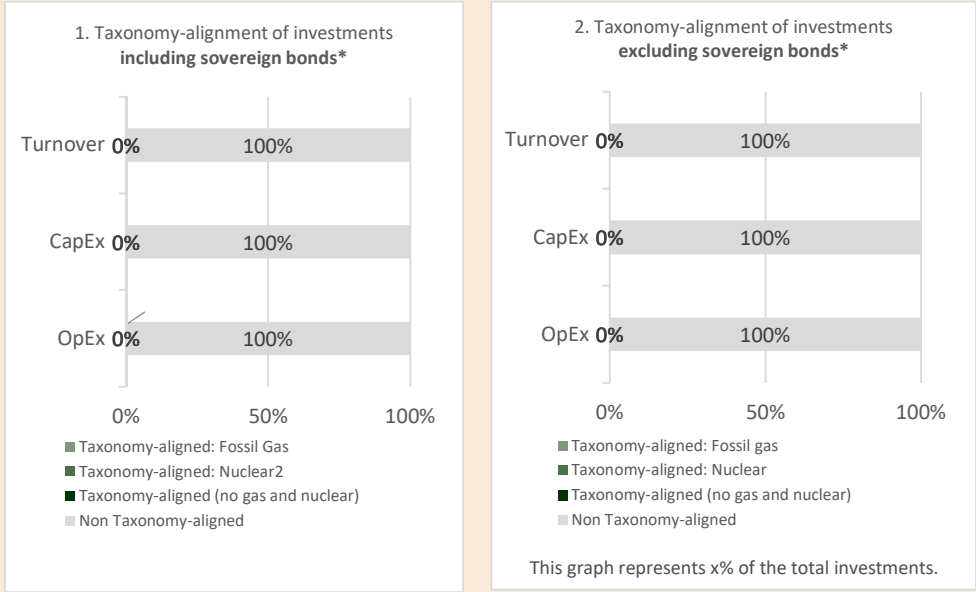
**Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?**

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.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.


<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 Product 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.

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

Not applicable. The Product did not intend to make sustainable investments with an environmental objective not aligned with the EU Taxonomy.



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

Not applicable. The Product 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.



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

As a passive investments strategy, during the reporting period the Product has tracked the MVIS® Global Space Industry ESG Index. Companies have been screened for compliance with the Index rules and the Index is rebalanced on a quarterly basis by the Index Provider. The Product replicated the Index based on the Index rules.

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

No breaches of the index have occurred.

In addition:

- The Glass Lewis ESG voting guidelines applied to this Product. Glass Lewis manages proxy voting, policy implementation, recordkeeping and reporting of voting activities.
- Glass Lewis Europe Limited has been appointed as engagement specialist for the passive equity funds managed by VanEck Asset Management B.V. The engagement provider determines the engagement approach in accordance with its engagement policy and based on its engagements' priorities.



**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 to the reference benchmark?

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

The index differed from a generic broad market real estate index in following ways:

- Thematic investment approach: companies that generate at least 50% (25% for current components) of their revenues from the following themes:
  - Space Exploration (including design of commercial spacecrafts, space tourism, scientific research, or delivery of equipment or cargo to space);
  - Rockets and Propulsion Systems (including products and services directly related to or to space vehicle systems or equipment, space payload, or other materials and equipment used to build spacecrafts or other vehicles used in space);
  - Satellite Equipment and Communications Solutions (including systems and software for satellite-based communication but excluding Pay-TV and communications service providers);
  - Other Satellite Equipment (including satellite equipment, systems or software for areas such as research, earth observation, space imaging or GPS).
- ESG Screening: companies with severe and 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.

### ● **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 Product invested 100% in line with the reference benchmark and had for that reason the same score on the sustainability indicators as the reference benchmark. The European ESG Committee has analysed and confirmed the alignment of the reference benchmark with its promoted environmental and social characteristics.

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

Indicator	Product: VanEck Space Innovators UCITS ETF	Reference benchmark: MVIS® Global Space Industry ESG Index
The percentage 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	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?**

Indicator	Product: VanEck Space Innovators UCITS ETF	Broad market index: Solactive GBS Global Markets Large & Mid Cap Index
The percentage 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	0.00%	9.10%
The percentage of portfolio involved in the fossil fuels industry	0.00%	10.55%
The percentage of portfolio involved in non-renewable energy production	0.00%	2.53%