

Second Quarter 2023

VanEck[®]

Access the opportunities.

VanEck – Emerging Markets Bond UCITS

Standard Due Diligence Questionnaire

Confidential information. Institutional Sales Material. Not for distribution to the public.
Please see Important Information in Disclaimers Section.

1	Firm Contact Information	3
2	Executive Summary	4
3	Fund Information	5
	3.1 VanEck ICAV (the “ICAV”).....	5
	3.2 VanEck – Emerging Markets Bond UCITS (the “Fund” or “EMB UCITS”)	5
	3.3 General Fund Information.....	7
	3.4 Additional Fund Information.....	8
4	Investment Team	8
	The Portfolio Management Team Members and Biographies	8
	Additional Funds Managed by the Portfolio Manager/Team	11
	Stability of the Team	11
5	Investment Philosophy and Research	12
	5.1 The Investment Philosophy of the Fund	12
	5.2 Please provide a summary of the Fund’s investment strategy	12
	5.3 Investment Decision-Making Process and Approvals	16
	5.4 Considerations of Environmental, Social, and Governance (“ESG”) Issues	17
	5.5 Fund Competitive Advantage	18
	5.6 Fund Risk.....	18
6	Benchmark and Relative Performance	19
	6.1 General Benchmark Information.....	19
	6.2 Diversification	20
	6.3 Limitation.....	20
	6.4 Valuation	20
	6.5 Sell Discipline	21
	6.6 Cash Policy	21
	6.7 Foreign Exchange.....	22
	6.8 Derivatives	22
	6.9 Risk Measures and Statistics.....	22
7	Trading and Execution	23
	7.1 The Centralised Trade Execution Team and their Experience.....	23
	7.2 Order Execution	23
8	Operational Information	24
	8.1 Fund Pricing.....	24
	8.2 Administrator.....	25
	8.3 Insurance	25
	8.4 Promoter	25
9	Fee Information and Separate Accounts	26
	9.1 Fund Fee Schedule	26
10	Disclaimers	27
	10.1 Important Disclosures	27

1 Firm Contact Information

Management Company	VanEck Asset Management B.V.	
Address	Barbara Strozzi laan 310, 1083 HN Amsterdam, Netherlands	
Website	www.vaneck.com	
Distributor¹	VanEck (Europe) GmbH	
Address	Kreuznacher Str. 30, 60486 Frankfurt am Main, Germany	
Website	www.vaneck.com	
Investment Manager	Van Eck Associates Corporation	
Address	666 Third Avenue, 9th Floor, New York, NY 10017, USA	
Website	www.vaneck.com	
Business Development	Philipp Schlegel	Bouke van den Berg
Phone	+41 (0)55 417 8055	+31 (0)20 719 5105
Email	pschelgel@vaneck.com	bvandenbergh@vaneck.com
	Salvatore Catalano	Eduardo Escario
Phone	+41 (0)55 417 8058	+34 (0)91 320 0047
Email	scatalano@vaneck.com	eescario@vaneck.com
	Ahmet Dagli	Florian Koerner
Phone	+41 (0)55 417 8053	+49 (0)69 4056 69540
Email	adagli@vaneck.com	fkoerner@vaneck.com
	Dominik Schmaus	André van Muijlwijk
Phone	+49 (0)69 4056 69524	+31 (0)20 719 5116
Email	dschmaus@vaneck.com	amuijlwijk@vaneck.com
	Koen Bendermacher	Roman Poole
Phone	+31 (0)20 719 5117	+41 (0)44 562 4068
Email	kbendermacher@vaneck.com	rpoole@vaneck.com
Portfolio Management	Eric Fine, Portfolio Manager	
Address	666 Third Avenue, 9th Floor, New York, NY 10017, USA	
Phone	+1 212 293 2143	
Email	efine@vaneck.com	

¹ Distributor for Switzerland: VanEck Switzerland AG - Genferstrasse 21, 8002 Zurich Switzerland; Distributor for the UK: VanEck Asset Management B.V. - Barbara Strozzi laan 310, 1083 HN Amsterdam, Netherlands.

2 Executive Summary

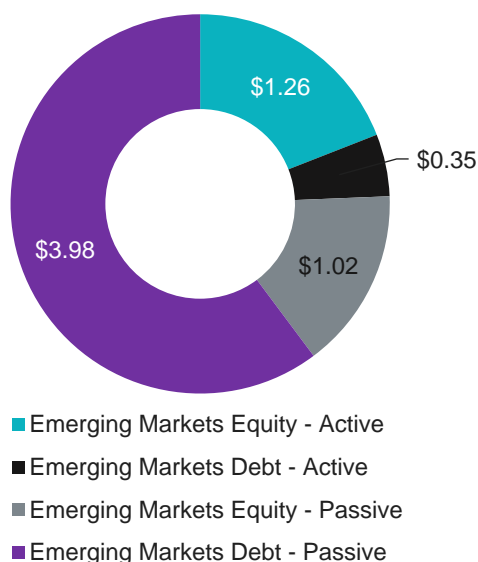
VanEck² (the “Adviser” or the “Firm”) is a privately held global asset management firm founded in 1955, with US\$77.8 billion in assets under management. Recognised for being a pioneer in global markets and for drawing on its experience to offer forward-looking, intelligently designed strategies that seek to strengthen a long-term investment portfolio, VanEck offers these strategies to individual investors and institutions, including endowments, foundations, pension plans and private banks across a range of vehicles including mutual funds (retail and institutional shares), pooled institutional funds, variable insurance portfolios, sub-advisory portfolios, separate accounts, exchange traded funds (“ETFs”), exchange traded notes (“ETNs”) and UCITS funds.

At the core of VanEck lies a strong commitment to identifying major trends that will underpin long-term opportunities in investor portfolios and complementing those ideas with comprehensive client service and direct access to investment professionals. VanEck solutions are purpose-built, aimed at either providing exposure to asset classes that are underrepresented in investor portfolios or offering a thoughtful approach to established investment categories.

Within the asset classes where VanEck has established expertise and leadership, the Firm believes that natural resources and emerging markets will continue to act as key investment areas. Over the last several years, the emerging markets have remained a source of exciting demographic and technological advancements. VanEck expects to capture, within its existing and developing strategies, the subsequent growth potential of the region’s companies, including those at the forefront of widespread digitalization trends occurring in the financial services and consumer sectors.

As detailed below, VanEck manages approximately US\$6.6 billion in emerging markets equity and fixed income assets across a variety of active and passive investment solutions. The dedicated investment teams manage over 20 different emerging markets-related strategies.

Assets under Management
by Emerging Markets Strategies (in \$B)



² VanEck is the marketing name for Van Eck Associates Corporation and its subsidiaries.

The VanEck Emerging Markets Bond Strategy (the “Strategy”) seeks to exploit opportunities wherever they are in the emerging markets (EM) fixed income asset class. The Strategy employs bottom-up, country and company-driven views along with a proprietary investment process that aims to normalise country and issuer data, analyses risk premium, and conducts a series of tests to assess short- to medium-term risk. The investment approach centres around two main criteria:

Unconstrained Approach

- Flexibility to invest across all four EM debt sub universes (sovereign and corporate, in local and hard currency)
- Optimisation of portfolio and country risks and returns
- Diversification potential areas across region, sector, currency, credit, duration, and maturity

Active and Liquid

- Market dynamics and valuations can change quickly and dramatically; therefore, the VanEck maintains a liquid portfolio to preserve the ability to adjust exposures

3 Fund Information

3.1 VanEck ICAV (the “ICAV”)

In September 2012, VanEck established the Van Eck SICAV – an investment company organised under the laws of the Grand Duchy of Luxembourg as a Société d'Investissement à Capital Variable. It was governed by Part I of the UCI Law, and qualifies as a UCITS.

In June 2017, the Van Eck SICAV merged into a newly formed VanEck ICAV (the “ICAV”). The ICAV is now registered as an umbrella Irish collective asset-management vehicle with segregated liability between sub-funds pursuant to Part 2, Chapter 1 of the Irish Collective Asset-management Vehicles Act 2015 (the ICAV Act) and is authorised by the Central Bank of Ireland pursuant to UCITS Regulations.

The ICAV’s Board of Directors is responsible for the overall management and control of the ICAV in accordance with the ICAV’s Articles of Incorporation. The Board of Directors shall have the power to determine the corporate and investment objectives and policy of the ICAV and each sub-fund thereof, as well as the course of conduct of the management and business affairs of the ICAV.

The Board of Directors of the ICAV is comprised of three independent directors and three employees of Van Eck Associates Corporation. As set forth in the Prospectus, the ICAV is an umbrella fund designed to offer investors access to a variety of investment strategies through a range of separate sub-funds.

The sub-fund featured in this document is VanEck – Emerging Markets Bond UCITS.

3.2 VanEck – Emerging Markets Bond UCITS (the “Fund” or “EMB UCITS”)

3.2.1 Overview

The Fund seeks total returns, consisting of income and capital appreciation. The Fund can invest in debt securities that are issued by governments, quasi-government entities or corporations in emerging markets countries. These securities may be denominated in any currency, including those of emerging markets. By investing in emerging markets debt securities, the Fund offers exposure to emerging markets fundamentals, generally characterised by lower debts and deficits, higher growth rates and independent central banks. The sub-Fund’s benchmark is a blended index consisting of 50% J.P. Morgan Emerging Markets Bond Index (EMBI) Global Diversified and 50% J.P. Morgan Government Bond Index-Emerging Markets (GBI-EM) Global Diversified.

3.2.2 Fund Directory

Investment Manager*	Van Eck Associates Corporation
Address	666 Third Avenue, 9th Floor, New York, NY 10017, USA
Phone	+1 212 293 2000
Fax	+1 212 293 2286
Website	www.vaneck.com
Management Company	VanEck Asset Management B.V.
Address	Barbara Strozziilaan 310, 1083 HN Amsterdam, Netherlands
Central Administration*, Custodian and Depository	State Street Fund Services (Ireland) Limited ("State Street" or the "Administrator")
Address	78 Sir John Rogerson's Quay, Dublin 2, Ireland
Global Distributor*³	VanEck (Europe) GmbH
Address	Kreuznacher Str. 30, 60486 Frankfurt am Main, Germany
Auditor	KPMG
Address	1 Stokes Place, St. Stephen's Green, Dublin 2, Ireland

* By delegation of the Management Company.

³ Distributor for Switzerland: VanEck Switzerland AG - Genferstrasse 21, 8002 Zurich Switzerland; Distributor for the UK: VanEck Asset Management B.V. - Barbara Strozziilaan 310, 1083 HN Amsterdam, Netherlands.

3.3 General Fund Information

Fund name	VanEck – Emerging Markets Bond UCITS
Inception date	The Fund launched on 20 August 2013 The initial Share Classes were USD I1 Inc and USD I2 Inc The USD RI Inc Share Class launched 12 June 2014 The USD M Inc Share Class launched 18 September 2014 The EUR I1 Hedge Inc Share Class launched on 6 October 2015 The EUR I2 Hedge Inc Share Class launched on 21 August 2017
Assets Under Management (“AUM”)	US\$112.79 million as of 30 June 2023
Start and ending of business year/accounting year	1 January to 31 December
Legal format	ICAV – UCITS Compliant
Ongoing charges	See Section 11
Share class currencies	USD, any alternative and freely convertible currencies available upon request
Currency hedging	State Street Bank Europe Limited have been contracted by the ICAV to act as the FX Hedging Manager for all Hedged share classes. Non-base currency share classes may be offered as hedged or unhedged.
Distribution policy	Each of the Classes of Shares may be available as Accumulation Shares (“Acc”) and Income Shares (“Inc”).
Registered in the following countries	Austria, Denmark, Finland, Germany, Ireland, Italy, Luxembourg, Netherlands, Norway, Singapore, Sweden, Switzerland, United Kingdom
Minimum subscription (by Share Class)	R1: 100 I1: 1.000.000 I2: 20.000.000 M: 100.000 I3: 50.000.000 (available upon request) I4: 100.000.000 (available upon request)
ISIN	USD R1: IE00BYXQSJ74 USD I1: IE00BYXQSF37 EUR I1: IE00BYXQSD13 USD I2: IE00BYXQSG44 EUR I2: IE00BYX22V58 USD M: IE00BYXQSH50
Bloomberg Ticker	USD R1: VAEMBR1 USD I1: VAUMUI1 EUR I1: VAEMI1H USD I2: VAUMUI2 EUR I2: VAEME12 ID USD M: VAUEMMI
Order deadline for transaction on T	13:00 IST (T)
Valuation frequency	Daily NAV is calculated on T+1 based on prices and Fund NAV on T
NAV release time	NAV is released on T+1, around 14:00 IST
Settlement date for subscriptions	T+2 Within 2 Currency Settlement Days following the Relevant Dealing Day for all Share Classes.
Dilution levy in favour of the Fund. Swinging Pricing. Please describe calculation methodology.	To date, the Adviser has elected not to implement swing pricing or a dilution levy.

3.4 Additional Fund Information

3.4.1 Is there a sub-management/sub-adviser agreement to manage the Fund?

The Fund's management company delegated the investment management of the Fund to Van Eck Associates Corporation, who acts as the sole investment manager of the Fund.

4 Investment Team

The Portfolio Management Team Members and Biographies

Eric Fine, Portfolio Manager, has over 30 years of experience in emerging markets. He is responsible for the portfolio, makes final decisions on all investments and is involved in all aspects of the Strategy (research idea generation, analysis, portfolio decision making, etc.). Mr. Fine is supported by the VanEck Emerging Markets Fixed Income Investment Team (the "Investment Team" or "Team") whose members have an average of 29 years of experience. David Austerweil serves as Deputy Portfolio Manager with a focus on research and trading. Natalia Gurushina serves as Chief Economist and focuses on research and macro-economic analysis. Robert Schmieder serves as Senior Corporate Analyst and focuses on corporate research and analysis.

The Team meets formally for approximately one to two hours every day, regardless of travel or holidays. When Team members travel on business, they write the Team detailed descriptions of everything learned. The Team meets with other VanEck investment teams twice a week to discuss current events and potential implications on portfolios. The Portfolio Manager also meets with the Active Investment Committee once a week to discuss recent changes, news and positioning.

Name	Title	Year Joined VanEck	Years of Industry Experience
Eric Fine	Portfolio Manager	2009	34
David Austerweil	Deputy Portfolio Manager	2012	21
Natalia Gurushina	Chief Economist	2013	28
Robert Schmieder	Senior Corporate Analyst	2015	36

Eric Fine, Portfolio Manager

Mr. Fine joined VanEck in 2009. He serves as the Portfolio Manager for the VanEck Emerging Markets Bond Strategy and oversees the Emerging Markets Fixed Income team. He is responsible for portfolio strategy, credit and market analysis and security selection.

Mr. Fine has been conducting business in emerging markets for over 30 years. Prior to joining VanEck, Mr. Fine founded and managed Morgan Stanley's Emerging Markets Proprietary Trading group from 2004 to 2008. Mr. Fine worked at Morgan Stanley for 14 years, including 6 years running the firm's Europe/Middle East/Africa (EMEA) research group, and 4 years running the Global Emerging Markets Economics and Strategy research group, winning numerous research awards (including from Institutional Investor and Euromoney) and outperforming indices with his model portfolios. While at Morgan Stanley, he advised numerous governments on economic policies and debt profiles and rescheduled sovereign debts in countries, such as Turkey and the Dominican Republic. Prior to Morgan Stanley, Mr. Fine started and led a telecommunications company in Russia for the Harvard Institute for International Development that built the country's first securities clearing system.

Mr. Fine received an MPA in International Trade and Finance from Harvard University's Kennedy School of Government, and earned a BA in Public Policy from Duke University. He has made numerous media appearances, has been frequently quoted in popular media, and is a contributing author for Institutional Investor and Barron's.

David Austerweil, Deputy Portfolio Manager

Mr. Austerweil joined VanEck in 2012. He serves as the Deputy Portfolio Manager for the VanEck Emerging Markets Bond Strategy and is responsible for portfolio management, trade execution, and quantitative investment frameworks; originate both sovereign and corporate investment ideas and research.

Prior to joining VanEck, he served as Vice President at ING Financial Services on the Emerging Markets Credit Trading & Structuring desk. Mr. Austerweil was previously a member of the Portfolio Management team at The Rohatyn Group, covering global emerging markets credit, including sovereign bonds, corporate bonds and CDS. He specialised in building quantitative frameworks for the investment process. Previously, Mr. Austerweil served as a Director in the Quantitative Financial Research group at Fitch Ratings, building among the first industry models to statistically quantify the credit risk of U.S. commercial real estate loans. Mr. Austerweil's earlier career experience includes an analyst position in the Municipal Finance Department at Goldman Sachs. Mr. Austerweil received an MS in Financial Engineering from Columbia University and a BA in Computer Science from Columbia University.

Natalia Gurushina, Chief Economist

Ms. Gurushina joined VanEck in 2013. She serves as Chief Economist for the VanEck Emerging Markets Bond Strategy.

Prior to joining VanEck, Ms. Gurushina worked for Roubini Global Economics, where she was responsible for Emerging Markets Currency/Fixed Income and G10 Currency Strategies. Her earlier career experience includes working as analyst at Pantera Capital (a Tiger spin-off), and as EMEA Economist for Deutsche Bank and Bankers Trust. Ms. Gurushina earned a PhD in Economic History from the University of Oxford and received a BA in Economics from Moscow State University.

Robert Schmieder, Senior Corporate Analyst

Mr. Schmieder joined VanEck in 2015. Mr. Schmieder serves as Senior Corporate Analyst for the VanEck Emerging Markets Bond Strategy.

Prior to joining VanEck, Mr. Schmieder served as Executive Director/Head of Latin America Credit Research at BBVA Securities. Mr. Schmieder previously served as Managing Director/Head of Latin America Corporate Credit Research at HSBC Securities (USA) Inc. Earlier career experience included similar positions at Calyon/Crédit Agricole CIB, Bear Stearns & Co., Inc., and Santander Investment Securities. Mr. Schmieder received an MBA with a focus on International Finance, an MA in Spanish Literature and a BA in Spanish Language and Literature from New York University.

Additional Resources to the Emerging Markets Fixed Income Investment Team

All of the Firm's teams work closely together, collaborate, and exchange research and expertise. The Team leverages important resources at VanEck – particularly those in the Global Resources Team, the Emerging Markets Equity Team, the Passive Fixed Income Team, and the Quantitative Investment Solutions (QIS) Team. All teams meet twice weekly.

Commodities are perhaps the most important export and economic variable for a large number of emerging markets countries. As such, the meetings with the Global Resources Team centre around commodity price developments, as well as micro developments of commodity companies in emerging markets countries.

Another important variable for a large number of emerging markets countries is equity flows. Therefore, the meetings with the Emerging Markets Equity Team centre on economic and corporate developments. Trading, settlement, corporate actions, and bond/system mathematics are also important; in addition to regular interaction, both the Team and the Passive Fixed Income Team meet weekly to discuss these issues and macro events in the fixed income space.

The Team meets weekly with senior Firm management and experienced mutual fund and UCITS portfolio managers to discuss all topics affecting the Fund, ranging from strategy and risk management

to operations. The Team also travels extensively to countries around the world to gauge investment opportunities and meet with government and diplomatic officials. In addition, the QIS Team conducts its own asset allocation and risk modelling research.

Passive Portfolio Management – Emerging Markets Fixed Income

Francis Rodilosso, Portfolio Manager, CFA

Mr. Rodilosso joined VanEck in 2012. He serves as Head of Fixed Income ETF Portfolio Management and is responsible for portfolio strategy, credit, and market analysis.

Prior to joining VanEck, Mr. Rodilosso served as Managing Director of Global Emerging Markets with The Seaport Group where he launched the firm's emerging markets fixed income sales and trading business. Mr. Rodilosso's earlier career experience includes portfolio management positions at Greylock Capital and Soundbrook Capital where he focused on corporate high-yield and distressed situations, with an emphasis on emerging markets. He also held senior fixed income trading positions at Credit Lyonnais and HSBC. Mr. Rodilosso is a CFA Charterholder and a member of the CFA Society New York. He received an MBA from the Wharton School of the University of Pennsylvania and a BA from Princeton University.

Active Portfolio Management – Emerging Markets Equity

David Semple, Portfolio Manager

Mr. Semple joined VanEck in 1998. He serves as Portfolio Manager for VanEck's Emerging Markets Equity Strategy and oversees the Emerging Markets Equity Team. He is responsible for company research, stock selection, and portfolio construction.

Mr. Semple is a veteran of emerging markets investing, with over 30 years of experience. From 1996 to 1998, Mr. Semple was a portfolio manager for Asian-focused funds and served on the team sub-advising VanEck's VIP Emerging Markets Fund at Peregrine Asset Management (Hong Kong). From 1993 to 1996, he served as sales director and regional strategist at Peregrine Brokerage. Prior to 1993, Mr. Semple was a portfolio manager specialising in Asia equity markets at Murray Johnstone (Glasgow).

Mr. Semple is a member of the CFA Institute and the Association of Investment Management and Research. He received a Bachelor of Law with Honours from the University of Edinburgh, Scotland. He has had numerous media appearances, including CNBC, Bloomberg, and NPR. Additionally, he has been quoted in Financial Times, The Wall Street Journal, and Barron's, among others.

Angus Shillington, Deputy Portfolio Manager

Mr. Shillington joined VanEck in 2009. He serves as Deputy Portfolio Manager for the VanEck Emerging Markets Equity Strategy, VanEck Emerging Markets Leaders Strategy and VanEck Emerging Markets SMA Strategy. With extensive experience in Asia and broad emerging markets equity, his current responsibilities include company and macroeconomic research relating to these regions, with a specialized focus on Asia.

Prior to joining VanEck, Mr. Shillington was Head of International Equity for ABN AMRO in New York with, among other things, oversight for equity sales and trading. Prior to moving to New York in 2001 to become Managing Director and head of Asian equity and derivatives distribution in the U.S. at BNP Paribas, he held senior management positions as a Director at both Paribas in Los Angeles and, internationally, at UBS Securities in Hong Kong, and in private client management at Hill Samuel/BLW in Edinburgh, Scotland. In his roles in both research and portfolio management, Mr. Shillington has developed a specialised focus on many Asian markets, a region in which he continues to be deeply involved.

Ola El-Shawarby, CFA, Deputy Portfolio Manager

Ms. El-Shawarby joined VanEck in 2017. She serves as Deputy Portfolio Manager for the VanEck Emerging Markets Equity Strategy and VanEck Emerging Markets Leaders Strategy. Prior to this role, Ms. El-Shawarby served as Senior Analyst with a specialized focus in the EEMEA (Eastern Europe, Middle East, and Africa) regions.

Prior to joining VanEck, Ms. El-Shawarby was Director and Investment Analyst at Caravel Management, LLC, where she was responsible for identifying and analyzing investment ideas and economic and political evaluations of growth and risk for Middle East, North Africa, and Emerging Europe equities and companies. Her previous experience included working as a Private Equity Summer Fellow at Kaust Investment Management Company helping to set the private equity investment strategy for the King Abdullah University of Science and Technology Endowment. Prior to this, Ms. El-Shawarby held several roles at EFG-Hermes Asset Management, including Analyst, Vice President, and Portfolio Manager.

Ms. El-Shawarby is a CFA Charterholder and a member of the CFA Society Egypt. She received an MBA from Harvard Business School and a BA in Business Administration (Summa Cum Laude) with a concentration in Finance from The American University in Cairo and a BS in Political Science with a minor in Economics from Cairo University.

Quantitative Investment Solutions (QIS)**David Schassler**

Mr. Schassler joined VanEck in 2012. He serves as Portfolio Manager and Head of the VanEck Quantitative Investment Solutions (“QIS”) Team. QIS serves as a quantitative analysis resource for VanEck’s active and passive investment strategies, particularly in the areas of asset allocation and risk modeling. QIS also conducts its own asset allocation and product development research, utilizing objective macroeconomic, fundamental, technical, and sentiment data and metrics. Mr. Schassler serves as Portfolio Manager for the VanEck Municipal Allocation Strategy and VanEck Inflation Allocation Strategy. He previously served as Director of Manager Research and as an Investment Committee Member for VanEck’s multi-manager alternatives strategies, where he was responsible for manager search and selection of alternative investment strategies.

Prior to joining VanEck, Mr. Schassler served as Director and Portfolio Manager within the UBS Portfolio Strategy Group where he was responsible for a multi-manager portfolio of assets for domestic-based clients. He previously held sales and client relationship roles at Oppenheimer & Co. and Georgeson, Inc. Mr. Schassler received an MBA in Finance from the New York University Leonard N. Stern School of Business and a BS in Business Economics from the State University of New York at Cortland.

Additional Funds Managed by the Portfolio Manager/Team

In addition to VanEck – Emerging Markets Bond UCITS, the Investment Team manages four Emerging Markets Bond accounts including a U.S. mutual fund, a VIP insurance fund, an Australia active ETF and an institutional segregated account with total combined Strategy assets of US\$354 million.

Stability of the Team**4.1.1 Please list investment personnel changes in the last five years for the Fund**

In 4Q20, Carlos Nogueira, previously Co-Deputy Portfolio Manager for the VanEck Emerging Markets Bond Strategy, transitioned off the Emerging Markets Fixed Income Investment Team. Carlos is now focused on product research and other internal projects at VanEck and serves as Portfolio Manager for the VanEck New Income Finance Fund, LP.

5 Investment Philosophy and Research

5.1 The Investment Philosophy of the Fund

The investment philosophy centres on the idea that fundamentals and asset prices are related. The Fund seeks to identify the cheapest emerging markets bonds, regardless of whether they are corporate bonds, sovereign bonds in dollars, or sovereign bonds in local currency. The three distinguishing factors for value creation are as follows:

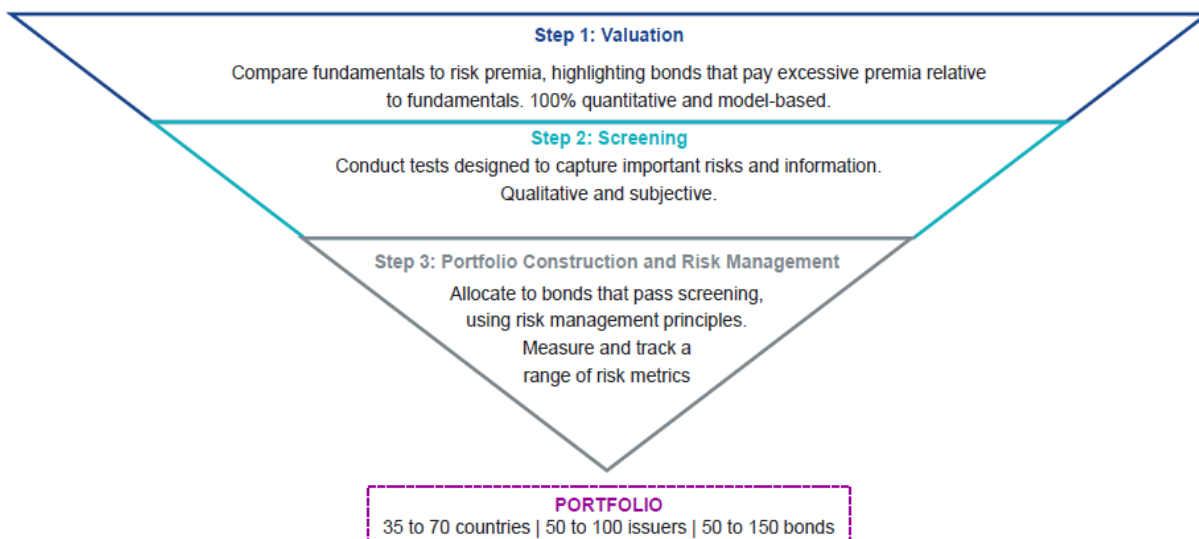
1. It casts a net across the entire EM debt universe – local, hard, corporate and sovereign.
2. It is index-agnostic; large benchmark weights are not considered a good argument for an investment.
3. The Team uses a bottom-up approach – the portfolio is a collection of cheap bonds, screened for non-systematic risk.

5.2 Please provide a summary of the Fund’s investment strategy

The Fund seeks total return, consisting of income and capital appreciation. The Fund can invest in debt securities that are issued by governments, quasi-government entities or corporations in emerging markets countries. These securities may be denominated in any currency, including those of emerging markets. By investing in emerging markets debt securities, the Fund offers exposure to emerging markets fundamentals, generally characterised by lower debts and deficits, higher growth rates, and independent central banks.

The Fund seeks to exploit opportunities wherever they are in the emerging markets debt asset class. The Team 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.

Investment Process Overview



Source: VanEck. Representative overview of the process which may differ over time by product, client mandate, or market conditions. Past performance is not indicative of future results. For illustrative purposes only.

5.2.1 Please describe the Fund's investment process in detail

Step 1: Valuation

First, the Team normalises country and corporate fundamentals by defining all fundamental and economic variables in units of standard deviations from the mean of the global peer group. More specifically, this step entails looking at 15 different fundamental metrics for each country and nine metrics for each potentially investible corporate, ranking each metric in units of standard deviation from peers. For example, rather than the Team using the metric of government debt/GDP of 100%, it will use 0.5 standard deviations worse than the mean as the metric. The final economic score for each country and corporate is expressed using a z-score which represents an average score of the country's and corporate's fundamental metrics. A z-score is employed so that the Team can know the extent of the difference of each country or company from its peers. The goal of the normalisation is to create a levelled playing field and put country and corporate variables into a form that allows for comparison.

The Team then compares these normalised fundamental scores for countries and companies to the premium on the bonds of those countries and companies. For hard-currency bonds, the Team examines credit spreads, for local-currency bonds the Team focuses on real yields. The comparison is designed to find the bonds that pay the highest premium relative to its fundamentals.

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. This list of cheapest bonds is put into an initial portfolio, with weights determined as follows. Bonds that are in the top quartile are allocated to the portfolio at 1.5x benchmark weight. If a bond is in the second quartile, it would be weighted at 1.25x benchmark weight. If a bond is in the third or fourth quartile, it will get weighted at 0.5x benchmark weight. Step 1 is completely systematic, and programmed by the Team. No tweaks or exceptions are allowed in Step 1.

Step 2: Screening

After bonds are ranked according to their premium relative to fundamentals, country- and company-specific tests are conducted to reduce or eliminate certain bonds. The country tests are policy/politics, economic, and technical. The corporate tests are governance, company, and technical. They are aimed at capturing risks that cannot be captured in a systematic way, and are therefore subjective. These are subjective assessments by the Team, but consistently applied, and documented weekly. For each test, the Team assigns one of two passing grades or one of two failing grades.

A strong failing grade – for example, if the Team expects a bond to be kicked out of an index and assigns a strong failing grade to its technical test – can result in the bond being eliminated from the portfolio. A weak failing grade can result in an allocation being reduced in the portfolio. Passing grades allow the initial weight from Step 1 to flow through with no adjustments.

Policy/Politics Tests Are designed to capture risks to a sovereign from policy and politics, which can sometimes be a determinant. These can range from elections of market-friendly or market-unfriendly political leaders, to a change in central bank personnel, or changes in fiscal stances.

Economic Tests Are designed to capture risks to the sovereign from specific, usually idiosyncratic, economic risks (not captured in Step 1). Economies have different features, and some are very unique, such as countries that depend on one commodity, or have a legacy of high inflation and thus high inflation expectations.

Technical Tests Are designed to capture technical factors that could be positive or negative. Index inclusion (positive) or exclusion (negative), is an obvious example. An issuer that is increasing its debt issuance too quickly would be another example.

Company Tests Are designed to capture risks to the corporate from specific, usually idiosyncratic, corporate risks (not captured in Step 1). For example, a corporate may have risks related to currency moves, or may have a too-concentrated product mix.

Governance Tests Are designed to capture risks from specific ownership/leadership issues, all of which are idiosyncratic, that could increase negative operating, as well as legal, outcomes. They include looking at ownership (public or private), transparency, availability to/communicativeness with the market. They also include corruption/ethics and environmental considerations. The latter, is in many cases a governance issue as it involves a management choice to take, or not take, action.

ESG Integration

ESG⁴ related factors are fully integrated into Step 2 of the investment process.

As outlined above, Step 2 of the investment process includes:

- Three tests for Corporates – “Company”, “Governance” and “Technical”
- Three tests for Sovereigns – “Economic”, “Policy/Politics” and “Technical”
- For Corporates:
 - “E” and “S” map to the “Company” test and “G” maps to the “Governance” test
- For Sovereigns:
 - “E” maps to the “Economic” test and “S” and “G” map to the “Policy/Politics” test

Each test results in one of two passing (green) or failing (red) grades. Tests are based on qualitative and quantitative inputs, regularly applied, but are ultimately subjective. Failed test scores can result in rejection of an investment.



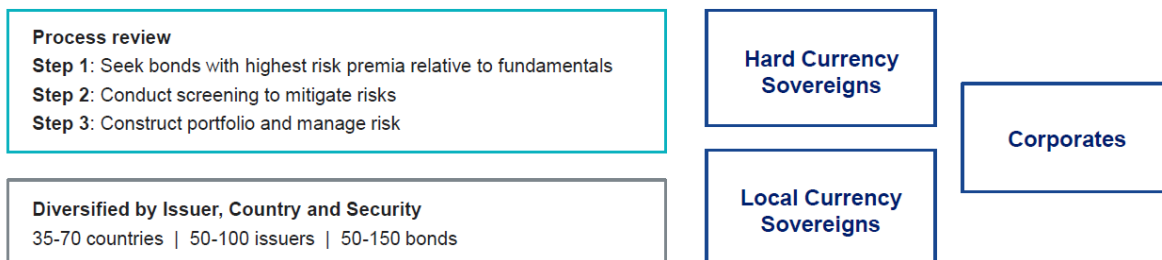
The tests allow the Portfolio Manager to revisit and adjust the weights in the initial portfolio that comes out of Step 1. Tests are applied bond-by-bond. The test score for a sovereign local bond may not be the same as the test score for a sovereign dollar bond, for example. The test score for a 20-year bond may not be the same as the test score for a 5-year bond.

⁴ ESG integration is the practice of incorporating material environmental, social and governance (ESG) information or insights alongside traditional measures into the investment decision process to improve long term financial outcomes of portfolios. Unless otherwise stated within the strategy’s investment objective, inclusion of this statement does not imply that the strategy has an ESG-aligned investment objective, but rather describes how ESG information is integrated into the overall investment process.

In determining the efficacy of an issuer’s ESG practices, VanEck will use its own proprietary assessments of material ESG issues and may also reference standards as set forth by both recognized global organizations, such as entities sponsored by the United Nations, and other organizations, such as the Value Reporting Foundation. VanEck may also engage actively with issuers to encourage them to improve their ESG practices. Through these engagement activities, VanEck seeks to help identify any opportunities there may be for a company to improve its ESG practices. There is, however, no assurance that VanEck will be successful in this aim.

Step 3: Portfolio Construction and Risk Management

Process Overview



Limits are measured at time of purchase.

For illustrative purposes only. The information above is intended to demonstrate VanEck's investment process and strategies, and the types of investment opportunities VanEck may consider. During any given stage of the investment process, the selection criteria may vary from those shown above.

Portfolio and Position Limits

- Portfolio limits on local currency, corporates, and distressed
- Positions subject to maximums and minimums
- Individual corporate exposure and industry exposure subject to maximums
- Duration subject to max/min limits at portfolio and country level

The steps above generate portfolio duration and local-currency exposure. The top-level risk metrics are the result of the bottom-up process. The Team does not look at the resulting portfolio and increase duration due to top-down views that U.S. interest rates may be declining.

Key risk measures are directly incorporated into investment decisions through each step of the investment process. It begins with normalised economic data and by comparing a country's collection of normalised data to its risk premium (real interest rates for local currency, and credit spreads for hard currency). The process rewards countries whose risk premium is too high compared to other countries with the same fundamentals.

As described in Step 2, the Team performs a further three tests related to policy, economy, and technical, to evaluate additional risks.

The Team conducts scenario analyses for each position and for the entire portfolio. The Team uses ten pre-set scenarios and adds additional scenarios.

Finally, the Team runs a Black-Litterman model for the portfolio, which uses the traditional backward-looking optimization framework (risk/return historically) and allows the Portfolio Manager to input an expected value and a confidence interval. This also acts like a reality-check. The Black-Litterman output essentially informs the Team that "based on historical risk/return, plus your input, your allocations here or there are too low or too large."

Additionally, as an important component of the process, the Team conducts regular visits to key countries, meeting with the official sector (e.g., central bank, ministry of finance), private sector (e.g., key banks, important companies), and independent bodies (e.g., media, official international organizations, opposition parties). In addition, the Team has similar meetings in the U.S., and regularly attends conferences focused on country risks.

After investment decisions are made, the Team constantly monitors portfolio risks through the following:

Tests in Step 2 are re-evaluated at least weekly:

- Periodic scenario analysis.
- The entire portfolio is evaluated and discussed weekly with the Firm's investment committee.
- The Team reviews the portfolio daily.
- Limits are hard-coded into the VanEck's portfolio compliance system.

- Portfolio-level risk analytics include DV01, VaR (by position and country), correlation, and other risk metrics, and these are maintained daily
- Risk is maintained and transmitted by the Bloomberg AIM Order Management System (the “OMS”) and internal risk management systems.
- The Team’s small size enables fast reaction, allowing for immediate response to breaking relevant news

5.3 Investment Decision-Making Process and Approvals

The decision-making process is a reflection of the established investment process which always starts with a country or company analysis. Country and company fundamentals are measured and compared with likely returns. Countries and corporates are then ranked relative to asset prices. Following the ranking, the Team conducts a wide range of tests for the numerous risks they have concerns about. In addition, the Team performs a scenario analysis that establishes targets and soft-stops (or re-evaluation levels) for every trade. Once the Team has decided on the particular investment, sizing is primarily a function of risk-adjusted return.

The decision process determines which investments are logical and the Team debates each position before investing in it. Once established, there are price targets and soft-stops which may trigger a re-evaluation. Every position is debated constantly. If there are short-term factors that mean an investment could come under pressure, the Team is comfortable reducing its positioning.

To enrich the daily discussion of every position, the Team members constantly travel to the relevant countries and companies they invest in. The Team also regularly participates in international conferences at which country and company fundamentals are presented by country and corporate officials. The Team is sensitive to market positioning, and determines this via surveys and regular interaction with market participants.

5.3.1 Please elaborate on how you screen your investment universe and generate ideas

Idea generation is the result of Step 1 of the investment process. This is the complete list of the cheapest bonds in emerging markets. The Fund is not designed to find “safe” countries, nor is it designed to find “home runs.” It is designed to find bonds that are cheap to fundamentals, whether those fundamentals are on the “good” or “bad” side. Once those cheap bonds are found, the Team conducts the tests in Step 2 of the process.

To inform the tests in Step 2, the Team researches its companies and countries. Each team member is a former researcher, so they are able to a) conduct their own research and b) leverage existing sell-side research effectively. On the latter, external research includes Wall Street research, industry conferences, industry trade publications, as well as information gathered from a network of industry-specific consultants.

On the former – conducting its own research – the Team is made up of former researchers, as noted. The Team conducts regular meetings with government officials and management teams. It travels extensively and meets with proponents of a company or country, but also local detractors (a local bank analyst may be sceptical or an opposition party may be critical). The Team also regularly participates in international conferences at which country and company fundamentals are presented by country and corporate officials. The Team is sensitive to market positioning, and determines this via surveys and regular interaction with the market participants. The Team writes regular reports on annual and semi-annual IMF meetings, and on every country visit, so that investors can be in tune with country details if they want.

The Investment Team only invests in companies where it has met a C-level representative. All meetings are documented. The Team prefers to meet issuers with other investors, to get a sense of what is priced in the market. As former researchers, the Team also has great contact with competitors, which can also discover issues.

For sovereigns, data quality is generally high. The Team uses rating agencies and the tools above –

regular country visits, the investment process – to determine potential problems. These problems used to be a feature of EM, but are not, currently, as data quality has become excellent for most EM countries.

5.3.2 Please elaborate on any quantitative tools you may use in this process

All steps in the investment process utilise a variety of quantitative metrics.

The normalisation of fundamentals is built and maintained entirely by the Team. The Team programs and updates the program in Step 1 by itself, so no outsiders are involved in this.

The Investment Team has a strong background in quantitative analysis. Several members of the Team were once quantitative analysts, so managing large amounts of information and using it to guide investment decisions is an area of expertise.

Also, as former researchers, the Team has experience doing all the work themselves, so it is rare that there's a challenge they haven't dealt with many times before.

5.4 Considerations of Environmental, Social, and Governance (“ESG”) Issues

VanEck considers ESG factors to be integral components of its investment philosophy and processes. As part of its continuing commitment to responsible investment, the Firm incorporates these factors into not only its investment analysis but also its engagement policies. ESG analysis and the advocacy of good practices are woven into the investment process because VanEck believes that it is part of its responsibility to clients to mitigate associated risks and encourage change that can enhance and protect long-term returns for shareholders.

VanEck's Investment Teams have frequent and extensive engagement with company management that allows us to identify and address material ESG matters. As signatories to the “Principles for Responsible Investment” (PRI), the Firm is committed to incorporating ESG risks and opportunities into its investment analysis, decision making and ownership policies. In addition, Eric Fine, Portfolio Manager, is the longest-serving board member of The Emerging Markets Investors Alliance (EMIA)⁵ a leading emerging markets ESG NGO.

VanEck incorporates sustainability risks and opportunities in investment decisions for the Emerging Markets Bond Strategy.

ESG Integration

- ESG framework is integrated as Step 2 of the investment process
- Sovereigns – the Team considers the World Bank ESG Portal Governance scores
- Corporates – the Team conducts company-by-company level ESG analysis by:
 - Leveraging third party ESG data provider research (i.e., ISS, Bloomberg, MSCI, RobecoSAM, etc.)
 - Private Evaluations (i.e. company views expressed in meetings, interviews, reports, etc.)
 - Public Evaluations, meaning National domestic agencies that analyse ESG as a part of their regulatory role (i.e. Departments of environment, commerce, justice, labour, safety, etc.).
- The Fund adheres to the Norges Bank Exclusionary list (<https://www.nbim.no/en/the-fund/responsible-investment/exclusion-of-companies>), further reiterating the Portfolio Manager's commitment to sustainable and responsible investing. In addition, under the SFDR regulation effective as of 18 November 2022, the Fund is categorized as “light green” or Article 8.

⁵ Further information on the EMIA can be found at <https://www.emia.org/>

5.5 Fund Competitive Advantage

5.5.1 What does the Firm consider to be the Fund's competitive advantage?

The Fund was among the first to combine local and hard currency bonds in one unconstrained offering. The Fund has the flexibility to invest in all emerging markets debt components: sovereign and corporates in local and hard currency. VanEck believes an unconstrained approach is important because idiosyncrasies exist, and country and currency selections are imperative. An unconstrained approach allows for tactical shifts based on market conditions. The investment process is based on a proprietary approach to assess an issuer's ability to meet its debt obligations, seeking to exploit mispricings.

- **Blend:** As one of the truly “unconstrained” emerging markets bond strategies in the market, it can invest in the major components of emerging markets debt –sovereign and corporate, local currency and hard currency.
- **Bottom-up:** The Fund's focus is on gaining exposure to bonds that pay a high premium relative to fundamentals. The research starts by developing a country view, not geopolitical or macroeconomic scenarios.
- **Greater Ability to Diversify:** The Emerging Markets Fixed Income Investment Team attempts to exploit the different risk and return characteristics of emerging markets countries and emerging markets debt sub asset classes to optimise country and portfolio risk. Through the unconstrained approach, the Team has a greater ability to maintain exposure to attractive yields while diversifying by currency, region, maturity, duration and credit.
- **Experienced Team:** Team members have an average of over 28 years of investment experience. The collective background of the Investment Team includes seasoned emerging markets bond researchers, experienced traders, an economist, and a senior corporate analyst. In addition, several members of the Investment Team both lived and worked in emerging markets.
- **Speed and Conviction:** The Fund is often composed of high-conviction investments, and often has positions with maximum weighting of 15%. The Investment Team will sell positions when they hit their price target or prove to be on the wrong side of the market. This typically results in a high-conviction, high-turnover portfolio reflecting the Team's current views at any given time.
- **Contrarian Views:** The Team avoids crowded investments and often strives to find the next best investment of which no one is yet aware.

5.6 Fund Risk

5.6.1 How is risk management incorporated in the portfolio management process?

Risk management is directly incorporated into investment decisions through each step of the investment process. Every corporate meeting generates significant notes, and all are documented. All country visits and important conferences are written up, and often published for investors. The Team is constantly meeting with research analysts and government officials. The Team typically conducts two country calls and three corporate calls per day.

Data behind Step 1 – which compares fundamentals to premia to generate a list of the cheapest bonds – are updated in real time. The Team has a database of historical fundamental and premia data, as well.

As described in Step 2 of the investment process, the Team performs three tests related to policy, economy, and technical, to evaluate additional risks. The tests for corporates are governance, company, and technical. These are formally done weekly, but the daily corporate and sovereign meetings can change a Step 2 test at any moment. It is documented weekly.

The Team also conducts regular visits to key countries, meeting with the official sector (e.g., central bank, ministry of finance), private sector (e.g., key banks, important companies), and independent bodies (e.g., media, official international organizations, opposition parties). In addition, the Team has similar meetings in the U.S., and regularly attends conferences focused on countries or companies.

In addition, Compliance monitors risk via the Bloomberg AIM Order Management System and any potential violations are flagged by the system prior to a trade being made. The investment committee monitors risk weekly in the form of a risk meeting. Developments that help or hurt positions are discussed, and changes made are explained and evaluated.

Risk Monitoring Overview

- Position limits
- VaR analysis
- Target and stops (re-evaluation levels) for each position
- Scenario testing

Portfolio Level Risk Management

- Stress-testing conducted regularly at the portfolio level, independent of bottom-up scenario analysis
- Portfolio-level risk analytics include DV01, VaR (by position and country), correlation, and other risk metrics maintained daily
- Investment team includes personnel previously responsible for stress-testing fixed income, foreign exchange, and interest rate groups at other firms

Additional Forms of Risk Management

- Investment team meets with the Active Investment Committee (“AMC”) weekly to review exposures
- Risk management committee (“RMC”) has global responsibility for oversight of the processes for identifying and mitigating business, operating, and investment risks
- Individual trades, positions, and portfolio allocations are also monitored in real-time by Bloomberg OMS, simultaneously by both the front office and by the middle/back office

5.6.2 What does the Firm consider to be the maximum manageable size of this Fund without facing any constraints?

VanEck does not believe the Fund to be capacity constrained. The main focus of the Emerging Markets Bond Strategy is to seek to deliver quality investment performance. Therefore, the Firm does not intend to accept an unlimited amount of investments. In determining capacity, VanEck takes into account the anticipated liquidity in the asset class and desirable position sizes. The Firm currently estimates capacity at US\$4 to US\$5 billion but reserves the right to soft close the Strategy at lower asset amounts.

6 Benchmark and Relative Performance

6.1 General Benchmark Information

6.1.1 What does the Firm consider to be the most appropriate benchmark for this Fund?

The Fund’s benchmark is a blended index consisting of 50% J.P. Morgan Emerging Markets Bond Index (EMBI) Global Diversified and 50% J.P. Morgan Government Bond Index-Emerging Markets Global Diversified (GBI-EM).

6.1.2 Are deviations/active weights against this benchmark crucial for the daily management of this Fund?

The Fund is focused on total return, within the confines of being a long-only emerging markets bond fund. The Fund does not give significant consideration to indices. The focus is generating total return, adjusted for country and corporate fundamentals.

6.1.3 In what type of market environment would the Fund be expected to outperform its respective benchmark?

As an unconstrained Fund, the Team takes maximum advantage of this flexibility to perform in a range of market environments. Allocations to local-currency or hard-currency vary mostly due to bottom-up factors, but sometimes due to top-down or thematic factors.

6.1.4 In what type of market environment would the Fund be expected to underperform its respective benchmark?

The unconstrained nature of the Fund allows the Team to seek opportunities in any of the emerging markets sub asset classes such as sovereign and corporates, in hard currency or local currency. Although the Investment Team expects the Fund to outperform both benchmarks over the long term, it might underperform in the short term in times of a sharp reversal of investors' appetites from one sub asset class to another. For instance, prior periods of underperformance were due to sharp reversal of flows from local currency to hard currency but those instances were short lived.

6.2 Diversification

6.2.1 What is the typical concentration level of the Fund (weight in top ten holdings)?

The Investment Team expects the top ten holdings to represent around 50% to 90% of the Fund's total holdings.

6.2.2 What is the maximum daily volume that can be handled to keep the structure of the Fund?

Based on the historical trading volume of other VanEck products, it is anticipated that the Fund could handle flows of roughly US\$100 million in a day, if needed.

6.3 Limitation

6.3.1 Are there any limitations regarding sector/industry weightings, regional weightings, positions sizes, and liquidity within the risk management process?

The Fund is focused on total return, within the confines of being a long-only emerging markets bond strategy. The Fund does not give significant consideration to indices. The focus is generating total return, adjusted for country and corporate fundamentals. The Fund has broad flexibility, and at times is fairly concentrated, but typically adheres to the following guidelines:

Portfolio and Position Limits

- Portfolio limits on local currency, corporates, and distressed
- Positions subject to maximums and minimums
- Individual corporate exposure and industry exposure subject to maximums
- Duration subject to max/min limits at portfolio and country level

6.4 Valuation

6.4.1 Which methods/models does the Fund apply for the valuation of a security?

The ICAV's assets shall be generally valued on the basis of market quotations, at the last available closing or settlement price on the relevant US market, or on any other relevant market being either a stock exchange of a Non-Member State, or a Regulated Market, or any Other Regulated Market of a Member State or of a Non-Member State, for a given Valuation Day. When market quotations on such markets are not readily available for a portfolio asset, or in the opinion of the Board of Directors do not properly reflect such asset's value, the ICAV will use the asset's "fair value" as determined in good faith in accordance with the ICAV's fair value pricing procedures which have been approved by the Board of Directors upon recommendation of the ICAV's pricing committee, if any, subject to further adjustment where the Board of Directors deems it necessary.

Factors that may cause the Fund to use the fair value of a portfolio security to calculate the Fund's NAV include, but are not limited to: (1) market quotations are not readily available because a portfolio security is not traded in a public market or the principal market in which the security trades is closed, (2) trading in a portfolio security is limited or suspended and not resumed prior to the time at which the Fund calculates its NAV, (3) the market for the relevant security is thin, or the price is "stale" (e.g., because its price doesn't change in five consecutive business days), (4) the Adviser determines that a market quotation is inaccurate, for example, because price movements are highly volatile and cannot be verified by a reliable alternative pricing source, or (5) where a significant event affecting the value of a portfolio security is determined to have occurred between the time of the market quotation provided for a portfolio security and the time at which the Fund calculates its NAV.

In determining the "fair value" of assets for which "market quotations are not readily available" the Pricing Committee considers the particular circumstances of each valuation issue as they arise and will be guided by factors articulated by the Securities and Exchange Commission from time to time. General factors, which are to be considered by the Pricing Committee in determining the "fair value" of securities, include:

- the fundamental analytical data relating to the investment,
- the nature and duration of any restrictions on disposition of the securities, and
- an evaluation of the forces which influence the market in which these securities are purchased and sold.

Foreign securities in which the Fund invests may be traded in markets that close before the cut-off time for capital activity. Foreign securities are normally priced based upon the market quotation of such securities as of the close of their respective principal markets, as adjusted to reflect the Pricing Committee of the Adviser's determination of the impact of events, such as a significant movement in the U.S. markets occurring subsequent to the close of such markets but prior to the time at which the Fund calculates its NAV.

6.5 Sell Discipline

6.5.1 Under which circumstances does the Fund sell a position? Is there a defined ex-ante price target?

A sell decision is triggered when a security in the portfolio hits the price target, or when there is a change in the buy assumptions of the security.

For each position, the Team sets a spread target. When this target is hit, the Team re-evaluates the position to see if a new spread target is necessary or if a sale is required. Buy assumptions are re-valuated regularly and any change in the assumptions that led to the investment in the security might trigger a sell decision.

All buy and sell decisions are discussed among Team members; however, Mr. Fine has final discretion to buy, sell, hold or increase positions. All decisions are intended to be by consensus and that has been the case for over a decade.

6.5.2 How rigidly does the Fund manager adhere to imposed sell limits?

The Fund manager adheres fairly rigidly to imposed sell limits with a bias to specific targets.

6.6 Cash Policy

6.6.1 Please describe the Firm's cash management policy

Cash will typically be invested in short-term treasuries and/or money market instruments.

6.6.2 Cash position and maximum liquidity degree

Cash is normally used for short periods of time. The Strategy is liquid and liquidity metrics are consistent with regulations.

6.6.3 Which liquidity requirements do potential portfolio holdings have to meet?

Liquidity is measured for each position, and the liquidity requirements are consistent with regulatory requirements. The Portfolio Manager measures liquidity in hours or days, not bid-ask size.

6.6.4 Is liquidity used for tactical reasons? Is it used systematically in order to increase performance?

Liquidity of positions, which is a requirement, is the only role of liquidity for the portfolio. The Investment Team tries to take into account reasonable scenarios that may adversely impact liquidity. A portion of the portfolio can be invested in illiquid eligible securities (10% under UCITS regulations). These securities are put into the portfolio when the premium is deemed excessive for the illiquidity, and when there is confidence in a long-term holding period.

6.7 Foreign Exchange

6.7.1 Is foreign exchange hedging used? If yes, which currencies are hedged?

The Investment Team has a bias against hedging currency risk, especially for any long period of time and for currencies that are expensive to hedge. The bias is to close a position, rather than hedge it, if necessary. Investments in currencies can be hedged directly (for example, using an NDF to eliminate the currency risk of a local-currency bond investment), or indirectly (for example, using an NDF in Euros to eliminate the currency risk of a Euro-accession country bond investment).

Share classes offered in non-base currency may be hedged or unhedged depending on the strategy of the class. Hedging of share classes is carried out by State Street Bank Europe Limited as the FX Hedging manager.

6.8 Derivatives

6.8.1 Are derivatives used for portfolio construction?

Practically speaking, very rarely, the Investment Team might use currency forwards to gain or hedge currency exposure. Overall, as per the Fund's investment parameters, derivative instruments may be used to reduce or hedge currency, interest rate, and credit risk. It may use derivative instruments, whose underlying shall consist of eligible financial indices, interest rates, foreign exchange rates or currencies, denominated in any currency to enhance return, hedge (or protect) the value of its assets against adverse movements in commodity markets, currency exchange rates, interest rates and movements in the securities markets, manage certain investment risks and/or as a substitute for the purchase or sale of securities. The Fund may also use derivative instruments to implement "cross-hedging" strategies, which involve the use of one currency to hedge against the decline in the value of another currency, or to hedge the value of a currency that is embedded in the value of another currency (for example, the value of the Euro that may be embedded in the Polish Zloty).

6.9 Risk Measures and Statistics

6.9.1 Is the Fund leveraged?

The Fund is not typically leveraged. The Fund may borrow on a temporary basis from banks, provided that the amount of borrowing is no more than 10% of the Fund's net assets. So far, the Fund has not been leveraged on any month-end.

6.9.2 Please describe the process implemented to control counterparty risk.

The majority of the Fund's investments are securities, so the relevant counterparty transaction and risk is Delivery versus Payment (DvP). Typical settlement for the Fund's securities trades ranges between T+1 to T+3. Derivatives may also be used to hedge risks, but this is limited. In both cases (DvP counterparties and derivative counterparties) counterparty risk is taken into consideration.

Counterparty risk is primarily controlled in the following ways. First, for derivative counterparties, ratings are a primary consideration before establishing a counterparty relationship and when transacting. Second, for all counterparties, VanEck has a counterparty approval process that takes a range of factors into consideration. Third, the Fund tries to diversify its counterparties, particularly if there is no triple-A rated counterparty (e.g., if for whatever reason counterparties get downgraded and there are no triple-A rated counterparties left, the Fund will diversify its counterparties).

Counterparty risk is monitored regularly to ensure it remains within the UCITS regulatory thresholds.

7 Trading and Execution

7.1 The Centralised Trade Execution Team and their Experience

All members of the Investment Team are responsible for idea-generation, analysis, and making investment decisions, including security selection, portfolio construction, and management.

Mr. Fine and Mr. Austerweil have a trading background, which enables them to trade the portfolio themselves. Trading is a natural addition to their other responsibilities, portfolio management and monitoring, and generating/analysing investment ideas. Mr. Austerweil leads the trading activities.

VanEck believes that having the trading responsibility within the Team ensures speed and efficiency in executing the investment strategy, and reduces information leakage that can occur with competitors that outsource trading activity to another group. Last but not least, information gained from trading can be very significant in regards to liquidity, or for example, upcoming capital controls.

7.2 Order Execution

7.2.1 Please describe the order execution process for the securities transaction of this Fund.

The Investment Team is responsible for portfolio construction as well as trade execution. As fixed income transactions typically occur over the counter and do not trade on a formal exchange, trade details are typically negotiated directly with market-making broker-dealers. Such trades are typically executed verbally or via electronic messaging, promptly input into the OMS, and allocated upon agreement of execution terms (e.g., price and quantity). Once entered in the OMS, transaction details are sent to the custodian via Bloomberg's straight through processing connection. A trade blotter is downloaded from the OMS (by Portfolio Administration) and emailed to the relevant custodian. VanEck reconciles with the custodian daily.

The Trading and Portfolio Management Departments must follow policies outlined in the Firm's Compliance Manual regarding the allocation of trades when orders for multiple clients or portfolios are combined, bunched for execution, or when there is a limited supply of an issue. Generally, the Firm will, to the extent permissible, bunch orders to seek to obtain better execution or prices. The executed portion of a transaction combining these orders will be allocated on a pro-rata basis.

7.2.2 Please describe your soft dollar policy.

Historically, the Firm did not generally utilise soft dollars with respect to its fixed income and/or passive businesses. In addition, in 2019, VanEck wound down its 'traditional' soft dollar relationships. VanEck no longer anticipates purchasing third party independent research with research credits generated via a 'traditional' soft dollar relationship.

7.2.3 Please describe the criteria for selecting brokers.

In determining the broker-dealers through which to effect securities transactions for the Fund and other accounts, it is VanEck’s policy to obtain quality execution at the most favourable prices. In selecting a broker-dealer, VanEck may consider various relevant factors, although no one factor is determinative in VanEck’s decision-making process. These factors include one or more, but are not limited to, best price, current market conditions, time constraints, liquidity, volatility in the markets, volatility in the particular type of security or asset, size and type of transaction, the nature and character of the market for the security or asset in the transaction, confidentiality, execution efficiency, settlement capabilities, financial condition of the broker-dealer, full range and quality of the broker-dealer’s services, the responsiveness, reputation, reliability and experience of the broker-dealer, the reasonableness of any commissions or spreads, difficulty of execution, ability and willingness to commit capital to the transaction, past effectiveness in executing illiquid or difficult types of securities/assets or difficult types of orders, and the value of brokerage and research services provided.

VanEck may effect transactions through a broker-dealer who furnishes brokerage and/or research services that result in the payment of a commission in excess of the commission another broker-dealer would have received for executing the transaction.

7.2.4 Please name the most important brokers for this Strategy.

Top Five Brokers in 2022 for VanEck Emerging Markets Bond Strategy
HSBC
JP Morgan
Jefferies
Morgan Stanley
Bank of America

7.2.5 Does the Firm trade for client accounts through its broker-dealer? If so, how is the inherent conflict of interest addressed?

Van Eck Securities Corporation is an affiliated limited-purpose broker-dealer that primarily distributes shares of registered investment companies and does not trade for client accounts. Van Eck Securities Corporation is not an approved broker and currently has no portfolio trading capability.

8 Operational Information

8.1 Fund Pricing

8.1.1 Please provide a summary of the controls in place to ensure accuracy when assets are valued in-house.

VanEck has engaged State Street Fund Services (Ireland) Limited to value the assets. State Street Fund Services (Ireland) Limited acts as the fund custodian, central administration agent, registrar, transfer agent, paying, and listing agent. As part of State Street Fund Services (Ireland) Limited’s central administration role, they price the portfolio on a daily basis in executing the Net Asset Value (“NAV”) under the oversight of VanEck Investments Ltd. In order to ensure all security prices are accurate, State Street best practices include the following. Prices are automatically cross-checked if:

- Prices have a deviation (meaning intraday variation computed by the systems exceeds 1% for equities)
- Security-level closing prices sourced from two different vendors exceed a 0% tolerance level of deviation between the two
- Historical tolerance review shows a price movement greater than 10% day-on-day
- The price is valued at 0
- The price is not updated

In addition, the Adviser, independent of State Street, prices the portfolio to ensure accuracy. Generally, the Adviser has programmed its investment accounting program to generate a daily exception report identifying securities that breach certain triggers similar to State Street.

8.1.2 How are any hard-to-price securities priced?

The portfolios are comprised of exchange-listed securities that can be readily priced through third-party pricing vendors, such as IDC or Bloomberg. If it were to occur that a hard-to-price security was in the portfolio, or market quotations are not readily available, or in the opinion of the Board of the Directors, does not properly reflect the securities' value, the funds will use fair value as determined in good faith in accordance with the funds' fair value pricing procedures which have been approved by the Board of Directors.

8.2 Administrator

8.2.1 What is the duration of the professional relationship with the Administrator?

VanEck has had a relationship with State Street Bank & Trust Company since 1997 when it was engaged as fund accounting agent for the U.S mutual funds. State Street has been acting as the custodian for VanEck's U.S. mutual funds since June 1999. In addition, VanEck has engaged with State Street for its UCITS business since its inception in 2012.

8.2.2 Have ongoing due diligence visits been conducted? If so, by whom, and at what frequency?

The management company, VanEck Asset Management B.V., conducts due diligence visits on a regular basis on behalf of the funds as follows:

- Monthly discussions of ongoing business items
- Receipt of monthly Key Performance Indicators ("KPIs") provided by the relationship manager of State Street
- Semi-annual discussions with key State Street personnel
- Annual on-site visits

VanEck Asset Management B.V. also carries out due diligence on the Investment Manager. Formal on-site visits are conducted on a bi-annual basis.

8.3 Insurance

8.3.1 Please indicate the name of carrier, dollar amount of coverage and the dollar amount of any deductible in the Firm's Director's & Officers ("D&O") Coverage.

Van Eck Associates Corporation has obtained a \$10 million Directors & Officers Liability Insurance policy for the VanEck ICAV, which includes additional endorsements for the Emerging Markets Bond UCITS, Emerging Markets Equity UCITS, Global Gold UCITS, and Global Resources UCITS. The coverage is through Endurance Worldwide Insurance Limited.

For Insured Persons, nil (\$0) retention applies for cases where the funds have not indemnified them and are neither permitted nor required to indemnify them. Retention of \$25,000 applies for claims brought in the United States.

8.4 Promoter

Van Eck Associates Corporation acts as promoter of the ICAV.

9 Fee Information and Separate Accounts

9.1 Fund Fee Schedule

Share Class	USD R1	USD I1	USD I2	USD M	EUR I1	EUR I2
Subscription fee	Up to 5.00%	None	None	Up to 5.00%	None	None
Redemption fee	None	None	None	None	None	None
Ongoing charges	1.20%	0.70%	0.60%	1.15%	0.76%	0.66%

For more information about charges, please see the "Fees and Expenses" section in the prospectus, available on www.vaneck.com. Additional Share Classes are available and may be launched upon request.

10 Disclaimers

10.1 Important Disclosures

IMPORTANT INFORMATION - FOR AUTHORISED USE ONLY - All documents on VanEck ICAV's sub-funds are for informational/advertisement purposes only and do not constitute any legal or investment advice. It is mainly dedicated to professional investors and is not to be regarded as an offer for the purchase and the sale of the fund's shares. Investors should consult the prospectus and key investor information before subscribing. The prospectus, the key investor information documents and the financial reports can be obtained free of charge from vaneck.com and upon request from VanEck ICAV's registered office at 25/28 North Wall Quay, Dublin 1, Ireland and the offices of all local information agents. The documents, except for key investor information, are only available in English. Please read these documents before investing and take note of the risk factors. Note: No guarantee can be provided that the Sub-Funds presented will attain their objectives. The value of an investment may decline as well as increase. All persons interested in investing in one of the Sub-Funds presented are recommended to seek advice from independent legal and tax advisors in order to ascertain whether the investment is appropriate to their own objectives.

THIS MATERIAL MAY ONLY BE PROVIDED TO YOU BY VANECK AND IS FOR YOUR PERSONAL USE ONLY AND MUST NOT BE PASSED ON TO THIRD PARTIES WITHOUT THE PRIOR EXPRESS WRITTEN CONSENT OF VANECK. IF YOU HAVE NOT RECEIVED THIS MATERIAL FROM VANECK, YOU ARE HEREBY NOTIFIED THAT YOU HAVE RECEIVED IT FROM A NON-AUTHORISED SOURCE THAT DID NOT ACT ON BEHALF OF VANECK AND THAT ANY REVIEW, USE, DISSEMINATION, DISCLOSURE OR COPYING OF THIS MATERIAL IS STRICTLY PROHIBITED. BEFORE MAKING AN INVESTMENT DECISION, PLEASE CONSULT A QUALIFIED INVESTMENT AND TAX ADVISOR.

You can lose money by investing in the VanEck –Emerging Markets Bond UCITS (“Sub-Fund”). Any investment in the Sub-Fund should be part of an overall investment program, not a complete program. The Sub-Fund is subject to risks associated with its investments in emerging markets securities.

Please see the relevant prospectus or key investor information document for more information on these and other risk considerations. Bond and bond funds will decrease in value as interest rates rise.

Any projections, market outlooks or estimates in this material are forward-looking statements and are based upon certain assumptions that are solely the opinion of VanEck. Any projections, outlooks or assumptions should not be construed to be indicative of the actual events which will occur. Further, any information regarding portfolio composition, portfolio composition methodology, investment process or limits, or valuation methods of evaluating companies and markets are intended as guidelines which may be modified or changed by VanEck at any time in its sole discretion without notice.

Any performance presented herein is for illustrative purposes only. Past performance of the Sub-fund is no guarantee for future performance. Historical information is not indicative of future results; current data may differ from data quoted. Performance information does not take into account the commissions and costs incurred on the issue and redemption of units. Performance information is presented net of fees, but gross of tax liabilities. Each index listed is unmanaged and the returns include the reinvestment of all dividends, but do not reflect the payment of transaction costs, advisory fees or expenses that are associated with an investment in any fund. An index's performance is not illustrative of a sub-fund's performance. You cannot invest in an index.

Forecasts, estimates, and certain information contained herein are based upon proprietary research and the information contained in this material is not intended to be, nor should it be construed or used as investment, tax or legal advice, any recommendation, or an offer to sell, or a solicitation of any offer to buy, an interest in any security. References to specific securities and their issuers or sectors are for illustrative purposes only and are not intended and should not be interpreted as recommendations to purchase or sell such securities or gain exposure to such sectors. The Sub-fund(s) may or may not

own the securities or be exposed to the sectors referenced and, if such securities are owned or exposure maintained, no representation is being made that such securities will continue to be held or exposure maintained.

Investing in foreign denominated and/or domiciled securities may involve heightened risk due to currency fluctuations, and economic and political risks, which may be enhanced in emerging markets. As the Sub-Fund may invest in securities denominated in foreign currencies and some of the income received by the Sub-Fund will be in foreign currencies, changes in currency exchange rates may negatively impact the Sub-Fund's return. Derivatives may involve certain costs and risks such as liquidity, interest rate, market, credit, management and the risk that a position could not be closed when most advantageous. The Sub-Fund may also be subject to credit risk, interest rate risk, sovereign debt risk, tax risk, non-diversification risk and risks associated with non-investment grade securities.

ESG investing is qualitative and subjective by nature, and there is no guarantee that the factors utilized by VanEck or any judgment exercised by VanEck will reflect the opinions of any particular investor. Information regarding responsible practices is obtained through voluntary or third-party reporting, which may not be accurate or complete, and VanEck is dependent on such information to evaluate a company's commitment to, or implementation of, responsible practices. Socially responsible norms differ by region. There is no assurance that the socially responsible investing strategy and techniques employed will be successful.

ESG integration is the practice of incorporating material environmental, social and governance (ESG) information or insights alongside traditional measures into the investment decision process to improve long term financial outcomes of portfolios. **Unless otherwise stated within the Fund's investment objective, inclusion of this statement does not imply that the Fund has an ESG-aligned investment objective, but rather describes how ESG information is integrated into the overall investment process.**

Please note that VanEck only serves professional clients in countries where the sub-funds are registered or where the sub-funds can be sold in accordance with local private placement rules. As such, the sub-funds are available for sale in certain jurisdictions only, and are not available for sale in the U.S. or to U.S. persons.

UK: Facilities Agent -- Computershare Investor Services PLC - Germany: Information Agent -- VanEck (Europe) GmbH - Sweden: Paying Agent -- SEB Merchant Banking – Austria: UniCredit Bank Austria AG.

FOR INVESTORS IN SWITZERLAND: The distribution of Shares of the Fund in Switzerland will be exclusively made to, and directed at, qualified investors (the "Qualified Investors"), as defined in the Swiss Collective Investment Schemes Act of 23 June 2006, as amended ("CISA") and its implementing ordinance. A copy of the latest prospectus, the Key Investor Information Document, the annual report and semi-annual report, if published thereafter can be found on our website www.vaneck.com or can be obtained free of charge from the representative in Switzerland: First Independent Fund Services Ltd, Klausstrasse 33, CH-8008 Zurich, Switzerland. Swiss paying agent: Helvetische Bank AG, Seefeldstrasse 215, CH-8008 Zürich; Place of performance and jurisdiction is at the registered office of the Representative.

FOR AUSTRALIAN WHOLESALE CLIENTS: VanEck US investment advisers offer investment management services that are regulated by US laws which are different to Australian laws. Such products and services are only available to wholesale clients in Australia as defined in the Corporations Act 2001 (Cth).

Non-VanEck proprietary information contained herein has been obtained from sources believed to be reliable, but not guaranteed. No part of this material may be reproduced in any form, or referred to in any other publication, without express written permission of VanEck. ©2023.