

# WisdomTree Strategic Metals and Rare Earths Miners UCITS ETF - USD Acc

Sustainability-related disclosure

## Summary

### Geen duurzame beleggingsdoelstelling

Het fonds promoot ecologische en sociale kenmerken, maar heeft geen duurzame beleggingsdoelstelling.

### Ecologische of sociale kenmerken van het financiële product

Het Fonds bevordert de milieudoelstelling van vermindering van de gegenereerde koolstofemissies, voornamelijk door te beleggen in bedrijven die betrokken zijn bij de waardeketen van metalen ten behoeve van de energietransitie (ETMVC). Vermindering van de koolstofuitstoot is noodzakelijk om de gevolgen van klimaatverandering tegen te gaan.

Het Fonds bevordert bovendien de specifieke milieudoelstelling van klimaatactie door het uitsluiten van bedrijven die in hoge mate betrokken zijn bij de thermische kolensector en onconventionele olie- en gasexploratie-/productiesector die veel broeikasgassen uitstoten, en promoot het sociale kenmerk van gezondheid, welzijn, vrede, gerechtigheid en sterke instellingen, door bedrijven uit te sluiten die in hoge mate betrokken zijn bij de tabaksindustrie en de handvuurwapensector, bedrijven die betrokken zijn bij controversiële wapens, evenals bedrijven die zich niet houden aan internationaal aanvaarde mensenrechten, arbeidsnormen of anticorruptieprincipes in overeenstemming met de indexmethodologie.

### Beleggingsstrategie

De beleggingsdoelstelling van het Fonds is de koers en het rendement te volgen, vóór aftrek van kosten en vergoedingen, van de WisdomTree Strategic Metals and Rare Earths Miners Index (de Index). De index aangewezen als referentiebenchmark om te bepalen of het Fonds is afgestemd op de ecologische en/of sociale kenmerken die het promoot.

### Aandeel beleggingen

Het Fonds zal alle of vrijwel alle activa beleggen in de componenten van de index, met als resultaat dat minimaal 90% van de intrinsieke waarde (NAV) van het fonds in overeenstemming is met de milieu- en sociale kenmerken van het fonds. Maximaal 10% van de activa van het fonds kan worden belegd in aanvullende liquide activa, in overeenstemming met de Verordeningen van de Europese Gemeenschappen (Instellingen voor Collectieve Belegging in Overdraagbare Effecten) van 2011 (icbe-verordening) of worden belegd in effecten waarvoor onvoldoende ESG-gerelateerde gegevens beschikbaar zijn van externe gegevensverstrekkers.

### Monitoring ecologische of sociale kenmerken

WisdomTree controleert de ecologische en sociale kenmerken die door het fonds worden gepromoot op het moment van elke herbalancering van de Index.

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### **Methodologieën**

De ecologische en sociale kenmerken die door het fonds worden bevorderd, worden gemeten aan de hand van gegevens van de indexprovider en, in voorkomende gevallen, van externe gegevensverstrekkers.

### **Databronnen en -verwerking**

Het fonds is een passief beheerd indexfonds en bereikt de ecologische en sociale kenmerken die het beoogd door de Index te volgen.

WisdomTree verwerkt gegevens van externe gegevensverstrekkers om emittenten te screenen op basis van de uitsluitingscriteria op ecologisch, sociaal en governance (ESG) gebied, zoals uiteengezet in de indexmethodologie, voor het bepalen van het in aanmerking komende beleggingsuniversum. De controle van de indexprovider en externe gegevensverstrekkers wordt jaarlijks uitgevoerd als onderdeel van de procedures voor verscherpt toezicht en due diligence van WisdomTree.

### **Methodologische en databeperkingen**

Om te voldoen aan de beleggingsdoelstelling en het beleggingsbeleid van het fonds vertrouwt WisdomTree op gegevens, waaronder ESG-gegevens. ESG-gegevens zijn afkomstig van externe verstrekkers en kunnen onvolledig, onnauwkeurig of niet beschikbaar zijn. Daarom bestaat het risico dat de indexprovider of andere gegevensverstrekkers (in voorkomende gevallen) de ESG-rating of de betrokkenheid van een bedrijf bij bepaalde activiteiten in het kader van de uitsluitingscriteria onjuist beoordelen.

### **Due diligence**

WisdomTree verricht vóór de introductie van het Fonds een due diligence-onderzoek uit naar de indexprovider en de referentie-index om te bepalen of het gewenste beleggingsresultaat en de milieu en/of sociale kenmerken die door het fonds worden bevorderd kunnen worden bereikt.

### **Engagementbeleid**

WisdomTree oefent stemrecht uit en onderhoudt constructieve contacten met ondernemingen waarin wordt belegd via zijn beleggingsbeheerders waaraan het portefeuillebeheer is uitbesteed. WisdomTree zorgt er bij de selectie van en het toezicht op beleggingsbeheerders voor dat het stem- en engagementbeleid van de beleggingsbeheerders voldoet aan de door WisdomTree gedefinieerde normen.

### **Aangewezen referentiebenchmark**

De index is aangewezen als referentiebenchmark om te voldoen aan de door het fonds gepromote ecologische of sociale kenmerken. Meer informatie over de index vindt u [hier](#).

## **No sustainable investment objective**

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

The Fund does not commit to making sustainable investments.

## **Environmental or social characteristics of the financial product**

The Fund promotes the environmental objective of reduction in carbon emissions generated, primarily by investing in companies involved in the ETMVC. Reduction in carbon emissions is necessary to combat the impact of climate change. ETMVC includes the exploration and processing of metals which are used in technologies and solutions associated with energy transition themes such as electric vehicles, transmission, charging, energy storage, solar, wind, and hydrogen. Development of such products and services supports goals to action climate change and ensuring access to affordable, reliable sustainable and modern energy for all.

The Fund additionally promotes the specific environmental characteristic of climate action by excluding companies significantly involved in the high greenhouse gas emitting sector of thermal coal and unconventional oil and gas exploration/production and the social characteristic of good-health and well-being and peace, justice and strong institutions, by respectively excluding companies significantly involved in the tobacco industry and small arms sectors, companies involved in controversial weapons as well as companies which do not adhere to internationally accepted human rights, labour standards or anti-corruption principles in line with the Index methodology.

The Index has been designated as a reference benchmark to determine whether the Fund is aligned with the environmental and/or social characteristics that it promotes.

## **Investment strategy**

The investment objective of the Fund is to track the price and yield performance, before fees and expenses, of the Index. In order to achieve this objective, the Fund will employ a "passive management" (or indexing) investment approach and will invest in a portfolio of equity securities that so far as possible and practicable consists of a representative sample of the component securities of the Index. The Index has been designated as a reference benchmark for the purpose of determining whether the Fund is aligned with the environmental and social characteristics it promotes.

The Index applies ESG exclusionary criteria and seeks to exclude companies from the eligible investment universe that are significantly involved (as described in the Index methodology) in thermal coal, unconventional oil and gas exploration/production and in the tobacco industry and small arms sectors. Companies with any involvement in controversial weapons or that fall within the bottom 5% based on their greenhouse gas intensity are also excluded from the eligible investment universe by the Index.

The Index methodology includes robust governance criteria whereby companies are assessed based on the Global Standards Screening (GSS) assessment which identifies and excludes companies from the eligible investment universe companies that violate international norms and standards, such as United Nations Global Compact principles (UN GCPs), UN Guiding Principles on Business and Human Rights (UN GPs) and OECD Guidelines for Multinational Enterprises and their underlying conventions.

Companies on the UN, US and EU sanctions list are excluded. In addition to the governance screening, to be eligible for inclusion in the Index, a company must be listed on an eligible stock exchange listed in the main body of the supplement for the Fund (the Supplement) and must comply with securities listing rules including relevant corporate governance codes.

The Fund considers principal adverse impacts (PAIs) at the fund level in accordance with the regulatory technical standards of SFDR (RTS). Indicators for PAIs (PAI Indicators) are a way of measuring how issuers negatively impact sustainability factors. Please refer to the section below "Due Diligence" regarding the controls in place to monitor constituent data for PAIs.

The Fund, through its Investment Manager, adopts an active ownership policy to develop good governance practices in investee companies.

## **Proportion of investments**

The Fund will invest all, or substantially all, of its assets in the constituents of the Index with the result that a minimum of 90% of the Fund's NAV will align with the environmental and social characteristics of the Fund.

Up to 10% of the Fund's assets may be invested in ancillary liquid assets in accordance with the UCITS Regulations or invested in securities for which there is insufficient ESG-related data available from third-party data providers. This applies in particular to assets for which ESG factors are insufficiently defined at present or which are not covered by third-party data providers. For more information, please see the Supplement for the Fund.

## **Monitoring of environmental or social characteristics**

The Fund promotes environmental and social characteristics outlined above by tracking the Index which applies ESG exclusionary criteria.

WisdomTree monitors the Fund's adherence to the environmental and social characteristics it seeks to promote. This is carried out by evaluating whether the Index is correctly applying the stated ESG screening and GSS assessment criteria described above. This includes an evaluation by WisdomTree of the ESG data provided by the third-party data providers.

WisdomTree also monitors the tracking error of the Fund and reports this to investors as part of the publication of annual and interim financial statements of the ICAV. Information on the anticipated tracking error is also published in the Supplement.

## **Methodologies**

The environmental and social characteristics promoted by the Fund are measured using data from the Index Provider and third-party data providers, where relevant.

The Fund seeks to track the Index which excludes companies based on ESG exclusionary criteria outlined in the Index methodology. The ESG exclusionary criteria is measured based on companies' revenue thresholds and data sources evaluated at each Index rebalance. The Fund's investments are assessed as being aligned with the environmental and social characteristics promoted by the Fund at each Index rebalance.

Certain PAIs are considered when evaluating the environmental and social characteristics promoted by the Fund using data provided by third party data provider which includes an evaluation of involvement in controversial weapons (PAI Indicator 14), greenhouse gas intensity (PAI Indicator 3) fossil fuels (PAI Indicator 4), non-renewable energy production (PAI Indicator 5) and UNGCP and OECD Guidelines violations (PAI Indicators 10 and 11).

## **Data sources and processing**

The Fund is a passively managed index tracking fund and attains the environmental and social characteristics it promotes by tracking the Index.

WisdomTree processes data provided by third-party ESG data providers to screen issuers based on the ESG exclusionary criteria as set out in the Index methodology to establish the eligible investment universe.

Monitoring of the Index Provider and third-party data providers is carried out annually as part of WisdomTree's enhanced oversight and due diligence processes. This due diligence includes evaluating methodologies adopted by third-party data providers to assess issuers, the sources of information that they use and the quality of the ESG data they provide. ESG Data coverage provided by third-party data providers is also assessed at each Index rebalance.

WisdomTree uses data sources from other third-parties for comparison purposes to identify any potential data inconsistencies. There may be issuers for which insufficient ESG-related data is available due to a lack of coverage by third-party data providers.

Data estimates may be used by third-party data providers particularly for smaller companies or where there are gaps in company reported data or where a company does not report actual revenues or certain business involvement categories.

## **Limitations to methodologies and data**

To meet the stated investment objective and policy of the Fund, WisdomTree relies on data ESG data provided by third-party data providers and may be incomplete, inaccurate, or unavailable. As a result, there is a risk that the Index Provider or other data providers (as applicable) may incorrectly assess the ESG rating or the involvement of a company in certain activities as part of the exclusionary criteria applied by the Index Provider. This may result in the incorrect inclusion or exclusion of a security from the Index and therefore the portfolio of the Fund.

Please refer to the section above "Data Sources and Processing" and "Due Diligence" regarding internal controls to monitor constituent data.

In placing reliance on external data providers, there may be inherent risk associated with errors in third-party data which may not be undetected by WisdomTree or the Index Provider. The result being that companies may from part of the investment universe that are inconsistent with the stated methodology of the Index and/or the stated investment objective/policy of the Fund. WisdomTree seeks to mitigate this risk by obtaining ESG data from reputable sources, using a second independent data source and investigating data differences to our primary ESG data provider.

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## **Due diligence**

WisdomTree carries out due diligence on the Index Provider and reference Index prior to the launch of the Fund.

As part of this due diligence, WisdomTree assesses the Index methodology to determine whether it would achieve the desired investment outcome and environmental and/or social characteristics promoted by the Fund.

This evaluation includes the investment universe of the securities, coverage by third-party data providers and the exclusionary screening criteria implemented by the Index.

In addition, WisdomTree monitors PAI indicators on sustainability factors of investee companies at the Fund level on a quarterly basis using an internally developed monitoring system and data received from the Investment Manager and the third-party ESG data provider.

## **Engagement policies**

As a responsible investor, WisdomTree adopts an active ownership approach to promote better corporate behaviour in investee companies in terms of sustainability and management of ESG risks.

WisdomTree exercises voting rights and constructively engages with investee companies through its investment managers, to whom portfolio management activities are outsourced. In selecting and monitoring investment managers, WisdomTree ensures that voting and engagement policies of the Investment Managers match the standards defined by WisdomTree.

Further details on WisdomTree's proxy voting policy are available at <https://www.wisdomtree.eu/en-gb/wisdomtree-investment-governance> and on WisdomTree voting dashboard available at: <https://www.wisdomtree.eu/en-ie/proxy-voting-dashboard>.

## **Designated reference benchmark**

The Index has been designated as a reference benchmark and utilises ESG screening criteria to meet certain environmental or social characteristics promoted by the Fund. Information on how that index is aligned with the environmental and social characteristics promoted by the Fund, including the input data, the methodologies used to select those data, the rebalancing methodologies and how the index is calculated can be found [here](#).