

Policy statement on the Human Rights Strategy of Deutsche Börse AG

(Version of 18 December 2023)

Our commitment to human rights

Fair working conditions in cross-border supply chains are the foundation for prosperity in a globalised world. Therefore, it is important that human rights along the supply chain of companies are comprehensively observed, respected and protected - this is also a central concern for Deutsche Börse AG.

We have been committed to the protection of human rights and the environment within the framework of our supplier relationships for many years. Our commitment is firmly anchored in our corporate culture and our values and is reflected in our internal corporate policies and actions. Thus, our commitment is an essential part of our corporate purpose - to create trust in the markets of today and tomorrow.

The present basic declaration in accordance with § 6 para. 2 Supply Chain Due Diligence Act (LkSG) deals in the following sections with our priorities regarding human rights and environmental risks, their consideration in supplier relationships and related measures. It describes the standards that we expect our suppliers and employees to comply with in accordance with the German Supply Chain Due Diligence Act. It applies to the business area of Deutsche Börse AG.

Our priorities

Our priorities are derived from the human rights and environmental risks we have identified as priority and are reflected in the expectations we place on our suppliers. In addition, we pay attention to the mitigation of certain environmental risks, which can indirectly also lead to a violation of human rights.

Priority human rights and environmental risks

Deutsche Börse AG regularly checks where human rights and environmental risks could exist in its supply chains. We work closely with external service providers to assess the impact of our business decisions and manage them appropriately. In this sense, we consider discrimination, disregard for adequate occupational safety, and the promotion of child and forced labour as priority risks.

The risk analysis is updated twice a year and as needed. The identified priority risks are also reflected in our expectations of our suppliers and employees.

Our expectations for suppliers and employees

With the aim of controlling and reducing the risk of human rights violations and environmental risks in our supply chains, we require our suppliers to contractually commit to complying with ethical behaviour standards in dealing with their employees, their suppliers, customers, and other third parties. Special attention is paid to the priority risks identified in the preceding paragraph at all [our locations](#) that fall within the scope of the LkSG. All of this is in line with [our Human Rights Statement](#), the [Code of Conduct for Suppliers](#), our [Code of Business Conduct](#), and our annual commitment to the [UK Modern Slavery Act](#). We consistently work towards ensuring that there is no form of corruption, discrimination, harassment, forced or child labour in our supply chains. Beyond this, we pay risk-based attention to compliance with local labour and human rights requirements at the locations of our suppliers.

Implementation

The risks identified above are addressed in our internal processes, which are outlined in the following paragraphs. Our procedures for mitigating potential human rights and environmental risks in our supply chains initially include the identification and assessment of risks, the taking of risk-based measures to prevent these and dealing with immediate suppliers. Further activities include remedial measures in the event of potential human rights violations, the setting up and operation of an LkSG-specific complaint procedure, and the appropriate handling of indirect suppliers in the event of potential human rights violations.

Risk management and analysis

All our efforts aim to identify potential and actual human rights risks and adverse effects of our business activities on people along the entire value chain. Therefore, Deutsche Börse AG identifies and assesses the relevant human rights risks, potentially affected parties of our business activities, and our direct and - as needed - indirect business relationships. The Executive Board of Deutsche Börse AG and relevant stakeholders are regularly informed about the results of the risk analysis.

The appropriateness and effectiveness of the measures taken to implement and comply with the due diligence obligations under the LkSG regarding the identified human rights risks in our own business area and those suppliers with increased risk (according to defined LkSG criteria) is reviewed within the framework of the risk management established by Deutsche Börse AG.

For the **risk analysis**, Deutsche Börse AG has set up a risk radar in cooperation with an external service provider as an internal process that identifies and assesses human rights and environmental risks among suppliers in the supply chain and pursues a systemic approach across all ESG dimensions. In the event of the occurrence of a potentially human rights- or environmentally relevant fact in connection with a direct supplier - for which a potentially increased risk has already been identified - of Deutsche Börse AG, the early warning system issues warnings, which are then evaluated on a case-by-case basis manually. In addition, Deutsche Börse AG is regularly and as needed in active dialogue with the respective suppliers.

Prevention in the company's own operations and towards direct suppliers

Depending on the identified risks, appropriate preventive measures are initiated. These include in particular

- the publication of this basic declaration and the implementation of the human rights strategy outlined in it in the relevant business processes
- the development and implementation of suitable procurement strategies and purchasing practices, through which identified risks are avoided or mitigated
- the training of employees in the relevant business areas
- the training of risk-based selected direct suppliers
- the contractual assurance of certain direct suppliers that they - by including LkSG-specific contract components - comply with the human rights-related expectations demanded by Deutsche Börse AG and address them appropriately along their supply chain (e.g., LkSG compliance clause, code of conduct for suppliers) and
- controls that are oriented towards the risk profile of Deutsche Börse AG and with which compliance with the human rights strategy contained in the basic declaration is monitored in its own business area.

Measurement of effectiveness

Deutsche Börse AG reviews at least once a year and as needed, the appropriateness and effectiveness of the implemented preventive measures with regard to the risks identified in the risk analysis. Therefore, Deutsche Börse AG has implemented various processes (such as the risk analysis and the LkSG-specific self-assessment of direct suppliers) to systematically identify and monitor possible human rights violations. These relate both to the business activities of Deutsche Börse AG and to its supply chain and the associated business activities.

Remedial action

In order to fulfil our responsibility for respecting human rights and environmental obligations, we rely on the interaction of different measures. Their goal is to protect the (potentially) affected individuals and to avoid adverse human rights and environmental impacts. If a risk has already materialised in our own business area or in the business area of a direct supplier, it is our goal to minimise its effects. For this purpose, we have established processes that can go through various escalation levels, up to the termination of a business relationship in the case of serious violations. The effectiveness of these remedial measures is reviewed at least once a year and as needed.

Grievance procedure

Deutsche Börse AG practices a zero-tolerance policy with regard to unethical behaviour in business life. Whenever we learn of a violation of the values of Deutsche Börse AG recorded in the [Code of Conduct for Business Life](#) and the [Code of Conduct for Suppliers](#), we will take corrective measures in partnership with our employees and direct suppliers to correct the violation and help prevent future incidents.

To uncover (potential) violations, we have set up a complaint procedure via the whistle blower system of [the BKMS platform](#), through which our employees and other stakeholders can report known or suspected violations (anonymously). In addition, there is the possibility to report complaints via email to humanrightsofficer@deutsche-boerse.com. With this, we aim to ensure that individuals who report violations in good faith receive the greatest possible confidentiality and the greatest possible protection from actual or threatened retaliatory measures or reprisals based on the information they provide.

Indirect suppliers

The complaint procedure also applies to indirect suppliers. For example, if a violation of LkSG-relevant human rights by an indirect supplier of Deutsche Börse AG becomes known as part of a report via the complaint procedure or otherwise, we also carry out a risk analysis for the indirect supplier and take appropriate preventive measures in the sense of the above measures. In addition, a remedial concept is created and the basic declaration is updated - if necessary.

Documentation and reporting requirements

We document the fulfilment of our due diligence obligations internally. In addition, we regularly inform the public on our website about our human rights and environmental risks and our measures and self-commitments as well as their effectiveness. This report is approved by the Executive Board of Deutsche Börse AG.

Furthermore, we conduct risk-based training for employees and suppliers on our human rights approach and environmental risks in the sense of the above-mentioned priorities and the associated guidelines. We exchange information with a large number of stakeholders on human rights issues and environmental risks, also as part of our annual materiality analysis, and report on our progress on our website.

Amendment provisions

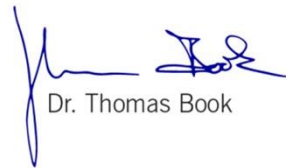
Deutsche Börse AG reviews and updates this statement annually and as needed. This document was approved by the Executive Board of Deutsche Börse AG on December 18, 2023.



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