

Corporate Engagement Policy

Guidance on corporate responsibility & citizenship activities

Version 1.5 – January 2024

Public

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1 Executive summary

The Corporate Engagement Policy lays down binding principles and standards for all corporate engagement-related activities at Deutsche Börse Group (Deutsche Börse AG and any of its entities, hereinafter “Group”).

It creates an effective approval process and first level control environment, ensuring a cohesive, aligned and effective Group-wide corporate responsibility and citizenship framework, and preventing any damage to the Group’s reputation, violation of established compliance rules or ineffective use of shareholder money.

Our corporate engagement follows two principles – that of effectiveness, and that of bringing in our strengths – and focuses on three main areas: education and culture, social cohesion, and sports. It is implemented with the help of four instruments: non-business-related sponsoring, donations, personal commitment, and memberships.

This policy applies to all employees and executives who are involved in the planning and execution of any corporate engagement activity as described in this policy.

Violation of this policy may result in disciplinary measures.

2 Introduction

The Group’s Corporate Engagement programme covers a specific part of the Group’s environmental social and governance (ESG) programme. It is based on the conviction that, in addition to their basic ethical and legal responsibilities, companies must assume responsibility for the environment in which they operate. Falling within the range of the “S” in “ESG”, the Group’s Corporate Engagement programme is concerned with managing the activities of the Group that cover the scope of giving back to the community, taking part in philanthropic causes, and providing positive social value.

Being a socially responsible company can bolster a company’s image and build its reputation as good corporate citizen. It positively affects the way in which the business operates, fosters company loyalty, and improves talent recruitment and retention. At the Group, we see corporate engagement as an ongoing commitment towards our shareholders and customers, our employees and our society.

2.1 Purpose of this policy

The Corporate Engagement Policy lays down binding principles and standards for all corporate engagement-related activities at the Group such as non-business-related sponsoring, donations, personal commitment (including staff fundraisers) and memberships. This is to ensure the effectiveness of said activities, a responsible use of shareholder money, and that said activities do not potentially damage the reputation of the Group or constitute a violation of established compliance rules.

2.2 Ownership/Responsibility

Any corporate engagement activity is a statement by the company that can shape both the public and internal perception of the Group, which is critical to the confidence of customers, shareholders and staff in the Group. Thus, the responsibility and final approval for all corporate engagement activities lies with Group Communications & Marketing.

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The owner of this policy is the Head of Unit “Content Desk Corporate & Corporate Engagement” within Group Communications & Marketing. The owner is responsible for releasing new versions of this policy after approval of the respective Executive Management.

This policy is updated and adopted according to the Policy on Creation and Update of Policies. It is reviewed at least annually.

3 Scope

This policy applies to all types of corporate engagement activities undertaken in the name of the Group as defined under paragraphs 5 (“[Areas of engagement](#)”) and 6 (“[Instruments of engagement and how to apply them](#)”). Furthermore, any corporate engagement initiative must be in compliance with the Group’s Anti-Corruption Policy and Policy on Conflicts of Interest. Initiatives involving political stakeholders are managed by Group Regulatory Strategy.

3.1 Scope of application

This policy is binding for all legal entities of the Group whose executive boards have approved the policy. It applies to all employees and executives who are involved in the planning and execution of any corporate engagement activity as described hereinafter.

Violation of this policy may result in disciplinary measures.

This policy supersedes all former versions.

4 Principles of engagement

Our commitment follows two principles – that of effectiveness, and that of bringing in our strengths.

Effectiveness	Bringing in our strengths
<p>Our engagement activities ...</p> <ul style="list-style-type: none"> - have long-term effects. - are scalable and can be rolled out in other locations. - achieve measurable success at the target groups. 	<p>Our engagement activities ...</p> <ul style="list-style-type: none"> - relate to core competences or core topics of the Group. - allow employees to become personally involved and participate directly. - have a direct connection to one of our locations or develop their effects in the vicinity of the location. - position the Group as good corporate citizen.

5 Areas of engagement

Our involvement focuses on three main areas: education and culture, social cohesion, and sports.

5.1 Education and culture

Our engagement activities should be in line with the following guiding principle: improving social participation through economic and financial education and contributing to cultural legacy.

Activities need to promote basic economic education for children and young people, stock market knowledge for students and private investors, or support universities and professorships with a focus on financial and capital markets.

In the cultural area, the Group supports fine arts projects and institutions (painting, sculpture, architecture, music, theatre, dance and poetry). A special focus lies on contemporary photography via the Deutsche Börse Photography Foundation. A project must offer a direct benefit to an institution from one of the aforementioned areas of fine art.

5.2 Social cohesion

Our engagement activities should be in line with the following guiding principle: promoting innovative and scalable approaches that foster social cohesion.

Activities need to address major challenges to social cohesion: demographic change; migration; [diversity, equity & inclusion](#); and digital transformation. Preference is given to approaches in which corporates, politics and society work together. A particular focus lies on supporting projects that help young people develop into valuable pillars of future society.

5.3 Sports

Our engagement activities should be in line with the following guiding principle: cooperating with outstanding partners to contribute to local social inclusion and interaction.

Activities need to provide a platform for employees to show their team spirit and strengthen their sense of togetherness or be of major strategic relevance for the Group's reputation.

6 Instruments of engagement and how to apply them

Our engagement is implemented with the help of four instruments: non-business-related sponsoring, donations, personal commitment, and memberships.

6.1 Non-business-related sponsoring

Non-business-related sponsoring means systematically supporting organisations or events in the areas of our engagement through cash and non-cash benefits as well as services with the aim of fulfilling philanthropic or charitable as well as communication and marketing objectives. Non-business-related sponsoring addresses specific target groups and is based on a mutual agreement in which the services provided by both parties are clearly defined in advance and are specified in a sponsoring contract, approved by Legal, Compliance, and Tax. Non-business-related sponsoring is particularly effective when it is geared to the medium or long term and incorporated in the Group's overall corporate communication.

- The project must be in line with at least one of the three areas of engagement.
- A Group company should be title or main sponsor.

- The number of additional sponsors should be as small as possible.
- If other sponsors are involved, their image should fit in with the Group's. Projects in which a direct competitor would be a co-sponsor should be avoided.
- The project must offer a direct benefit to the employees of the Group.
- The Group sponsors institutions or events, not individuals.
- No conflict of interest arises from the non-business-related sponsoring.

6.2 Donations

6.2.1 Donations made by the Group

Donations include cash and non-cash benefits for charitable purposes and for projects in our areas of engagement.

- The project must be in line with at least one of our three areas of engagement.
- The project should be non-profitable.
- We only support projects that are carried out together with established and well-known or recognised social institutions which use the funds for a specific charity project (e.g. on a local level).
- We do not provide direct financial support of i) political parties or candidates, or ii) religious organisations, regardless of country.
- No conflict of interest arises from the donations.
- Single donations or combined donations of €100,000 p.a. or more must be reported to the Group Money Laundering Officer in advance.
- Single donations or combined donations p.a. of €250,000 p.a. or more must be formally approved in advance by the Executive Board of the relevant company.

6.2.2 Privately organised fundraisers

Privately organised fundraisers by the Group's staff are supported by this policy. However, in order to protect the integrity of Group entities as strictly regulated companies at all times, privately organised charitable activities, especially those involving a call for funds or gift giving, must be clearly recognisable as such. It must be clear and unambiguous that such privately organised fundraisers do not imply a corporate endorsement, that at no time, the Group is connected to the beneficiary, nor that it has been involved in selecting the beneficiary receiving the donations. Corporate imagery or entity names must not be used to depict or describe this type of charitable activity. Such activities must be brought to the knowledge of the Head of Content Desk Corporate & Corporate Engagement.

6.3 Personal commitment

Personal commitment describes the personal and voluntary involvement of our employees, often with the company's backing, to charitable organisations and projects in our three areas of engagement. We want to motivate our staff to assume their responsibility towards society and support local corporate citizenship initiatives at the Group's locations.

- The project must be in line with at least one of our three areas of engagement.

- Group Communications & Marketing, together with the local representatives, coordinates the selection of formats and organisations in which employees can get involved. Employees can suggest additional projects and organisations.
- Each year, the Group gives employees paid time off for up to three working days for voluntary activities. In addition to these voluntary-work days, employees are also given paid time off to participate in the Social Days organised by the Group.
- Employees are released for selected projects after consultation with HR and their line manager.
- If commitment during working hours is required, the project should not exceed one day.
- No conflict of interest arises from personal commitment.

6.4 Memberships

The Group supports various initiatives and institutions in the form of memberships. A membership may include financial contributions, the participation of employees in events or any other involvements. Any membership should ideally be relevant for the entire Group, but at least for the respective business area which enters into a membership. Terms and conditions of the membership are clearly defined in advance as well as approved by Legal and Compliance.

- The membership must be in line with at least one of our three areas of engagement.
- Memberships can be geared to the long term, but the contracts must be terminable on an annual basis.
- No conflict of interest arises from the membership.

7 Disaster relief

The Group is committed to corporate engagement beyond the outlined customary standards to provide impactful natural disaster response and support humanitarian action. In case of a natural or humanitarian disaster that occurs a) in the vicinity of one of the Group's locations or b) has an impact on a significant number of staff, Group Communications & Marketing will request funds from the Executive Board of Deutsche Börse AG to be donated to relief organisations that are in line with the Corporate Engagement Policy and other relevant policies.

8 Procedure and approval

This chapter describes the procedure for the approval of corporate engagement activities.

8.1 Approval process

To contribute to an effective first level control environment and efficient review process, the owner of the planned activity should check if the criteria outlined in this policy are met and obtain preliminary approval of their line manager to proceed before any project is submitted for review. The owner should also thoroughly consult the Code of Business Conduct, the Group's Anti-Corruption Policy and Policy on Conflicts of Interest.

All corporate engagement activities as described in this policy must be reported to Content Desk Corporate & Corporate Engagement at least 14 days before the final decision on the activity is taken in written form via e-mail to:

corporate.engagement@deutsche-boerse.com

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The team of Content Desk Corporate & Corporate Engagement has up to 14 days to report back to the owner of the planned activity any concerns about the activity and to pause or prevent the execution of the activity if the criteria described in this policy are not sufficiently met.

Within these 14 days, the team of Content Desk Corporate & Corporate Engagement may also consult with Group Compliance and Group Legal in case of any doubt that the planned activity may not be compliant with the aforementioned policies. If the team of Content Desk Corporate & Corporate Engagement decides to consult with Group Compliance and Group Legal, the owner of the planned activity will be informed and asked to wait for the result of the review by Group Compliance and Group Legal before proceeding with the planning or execution of the activity.

8.2 Approval criteria

- 1) The project follows the principles of our commitment (score 5-7, see chapter 4)
- 2) The project is in line with at least one of the three areas of our engagement.
- 3) The project uses the instruments of our engagement and how they are applied.
- 4) The project is compliant with our Anti-Corruption Policy.
- 5) The project is compliant with our Policy on Conflicts of Interest.
- 6) The project is compliant with our Code of Business Conduct.

Projects can be approved if they have a minimum score of 5 (see score card, chapter 8.3) and criteria 2), 3), 4), 5) and 6) are met without exception.

8.3 Score card

	The project ...	
Effectiveness	- has long-term effects.	Yes / No
	- is scalable and can be rolled out in other locations.	Yes / No
	- includes a procedure to measure the effectiveness at the target groups.	Yes / No
Bringing in our strengths	- relates to core competencies or core topics of the Group.	Yes / No
	- allows employees to become personally involved and participate directly.	Yes / No
	- has a direct connection to one of our locations or develops its effects in the vicinity of the location.	Yes / No
	- positions the Group as good corporate citizen.	Yes / No
		Total score: