

# Human Rights

## Deutsche Börse Group Statement on Human Rights

Deutsche Börse Group is committed to protecting and upholding human rights around the world. Our commitment is embedded in our corporate culture and values and reflected in our policies and actions. In doing so, we are holding our employees, business partners and clients as well as the communities in which we operate accountable.

We strive to create an environment where respect is shown to all people. We do not tolerate any form of corruption, discrimination, harassment, forced or child labour. Furthermore, we are committed to comply with local employment and human rights laws across all our locations. Beyond our general conviction that this is a vital contribution to protect and promote human rights, our code of business conduct and various corporate policies obligate us to do so.

Together with our business partners and local communities, we further support cultural, economic and social development initiatives.

This makes our commitment to human rights a vital component of our purpose to create trust in the markets of today and tomorrow.

## 1. Our Approach

Deutsche Börse Group is fully committed to respect human rights and to take the actions set out in this Statement to strive to promote compliance with a wide range of international external standards and principles, including the

- UN Guiding Principles on Business and Human Rights;
- Universal Declaration of Human Rights;
- International Bill of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- UK Modern Slavery Act;
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- Principles of the UN Global Compact, including but not limited to
  - The support and protection of the internationally proclaimed human rights
  - The elimination of all forms of forced and compulsory labour
  - The effective abolition of child labour
  - The elimination of discrimination in respect of employment and occupation
  - Safeguarding the freedom of association and the effective recognition of the right to collective bargaining;
- OECD Guidelines for Multinational Enterprises.

Deutsche Börse Group strongly supports conventions aiming to eliminate forced labour and child labour and to promote equality. The Group also recognises that modern slavery is a crime and a violation of fundamental human rights. This commitment to protect human rights is embedded in particular in Deutsche Börse Group's code of business conduct.

Our approach is to engage with customers, governments, non-governmental organisations, and communities to manage the impact that stems from our business decisions. This Statement outlines the standards we encourage or expect our stakeholders to align to.

## 2. Commitments

We are committed to providing a safe and healthy work environment. We do not tolerate discrimination, harassment or retaliation by employees, suppliers, business partners or customers.

### 2.1 Employees

We believe diversity and inclusion to be vital to our global success. Therefore, Deutsche Börse Group is committed to fostering a workplace where everyone feels included and welcome to contribute their ideas as part of a healthy and productive working environment. We advocate for and thrive through openness and fairness. We consider the wealth of backgrounds and ideas to be key to our success. The empowerment of women and the protection of minorities constitutes the core of our efforts for a safe and healthy workplace environment. We oppose sexual harassment, discrimination based on protected characteristics such as gender, sexual orientation, ethnicity, degrading or offensive comments or jokes, bullying, violence, intimidation, or threats.

Deutsche Börse Group recognises the importance of matters such as data privacy, equal remuneration, freedom of association and collective bargaining and addresses them accordingly. Furthermore, we oppose forced labour as well as child labour and human trafficking and do not tolerate them.

Deutsche Börse Group regularly provides trainings for employees on our expectations for a culture of decency and respect, as well as trainings amongst others on anti-money laundering, trade sanctions, data privacy, information and corporate security and workplace conduct. This also includes trainings concerning issues related to diversity and inclusion.

We enforce these policies and standards by providing multiple ways for our employees to report concerns, including an anonymous reporting option (cf. **5. Governance and reporting**), by investigating the concerns we receive and by holding individuals accountable for their behaviour.

For more details, please refer to the Annual Report and the [website](#).

## 2.2 Suppliers

Deutsche Börse Group's management approach includes respect for human rights also in the supply chain. Accordingly, Deutsche Börse Group observes the provisions to protect human rights in accordance with the German Act on Corporate Due Diligence in Supply Chains (LkSG) as well as with the standards set by the International Labour Organisation (ILO) in connection with the Universal Declaration of Human Rights of the United Nations. This commitment to protect human rights is embedded in the Group's corporate culture and values and is reflected in policies and actions with respect also to suppliers.

We expect compliance with applicable regulations in relation to human rights and we continuously work within Deutsche Börse Group and with our suppliers to facilitate such compliance and to further pursue standards and principles of social and ethical responsibility even beyond binding regulatory requirements.

In particular Deutsche Börse AG and centrally-serviced Group entities have introduced a code of conduct for its suppliers, which comprises a comprehensive set of ESG criteria. Accordingly, its suppliers are contractually bound by standards of ethical conduct when dealing with their employees, their suppliers, customers and other third parties. As outlined in our Statement on the Deutsche Börse Group Human Rights Strategy according to German Supply Chain Act (LkSG), they are monitored and reviewed according to various risk criteria, including human rights concerns, in cooperation with an external service provider. This "risk radar" monitors risks along the entire supply chain from (sub-)suppliers to logistics nodes, right through to the end customer.

More details on our implementation of human rights principles in procurement can be found in the [Code of Conduct for Suppliers](#) in the [Statement on the Deutsche Börse Group Human Rights Strategy according to German Supply Chain Act \(LkSG\)](#) and on the [Deutsche Börse Group website](#).

## 2.3 Customers

Deutsche Börse Group has policies to strive to prevent the illegal use of our products and services, including

abuse that may result in human rights violations. We expect compliance with applicable regulations, and we continuously work within Deutsche Börse Group and with our customers to facilitate such compliance and further pursue standards and principles of social and ethical responsibility even beyond binding regulatory requirements.

## 3. Due Diligence / Control Framework

Deutsche Börse Group has implemented various processes to identify potential human rights impacts in a proactive and systemic manner. They relate to our own operations as well as our value chain and associated business activities and are systematically and periodically reviewed. To this end, we have identified three specific areas: our HR, our supply chain and our mergers and acquisition activities.

### 3.1 Human Resources

The HR department has identified three groups at risk, namely Deutsche Börse Group's own employees, third-party employees, and specifically female persons in both groups. Specific risk-related topics include – but are not limited to – discrimination and equal remuneration. To address these risks systematically and proactively, various measures have been implemented:

- the [Diversity & Inclusion Council](#) provides a Group-wide framework and guidance for all diversity-related topics and all of its members act as persons of trust for all diversity-related issues;
- Deutsche Börse Group has set ambitious goals for increasing the share of women in management;
- our [Anti-Harassment Policy](#) defines all relevant types of harassment and discrimination Deutsche Börse Group opposes, including appropriate procedures and disciplinary actions and covering all employees of Deutsche Börse Group and business-related third parties. Next to the disciplinary actions defined in the Anti-Harassment Policy, the Disciplinary Action Policy defines possible consequences for misconduct in a more specific manner;
- all employees of Deutsche Börse Group are

asked to participate in an anonymous online survey about their satisfaction with Deutsche Börse Group as an employer. During this process, any issues can be brought forward and will be handled accordingly. The results of this annual engagement survey are published in the annual report and considered for further improving our employee satisfaction;

- to mitigate the risk of discrimination and other illegal or unethical behavior, Deutsche Börse Group provides mandatory compliance trainings for employees on a regular basis (cf. **2.1 Employees**).

Beyond that, Deutsche Börse Group is committed to comply with all current HR related legal requirements applicable. Therefore, topics like freedom of association and the right to collective bargaining are not specifically addressed in this document as they are legally granted.

### 3.2 Supply Chain

To address risks related to the supply chain, including fair business practices such as anti-corruption, forced and child labor as well as socially responsible behavior, conflict minerals and discrimination, the code of conduct for suppliers as implemented by Deutsche Börse AG as well as centrally-serviced other Deutsche Börse Group entities for their suppliers comprises a comprehensive set of environmental, social and governance criteria. As outlined above, Deutsche Börse AG has established a “risk radar” in cooperation with an external service provider, representing an internal process that monitors and reviews all suppliers individually using a systemic and proactive approach across all ESG dimensions.

### 3.3 Mergers & Acquisitions

Deutsche Börse Group’s Group Strategy and M&A department manages the process to identify risks related to potential acquisitions targets. Deutsche Börse Group has a proven track record of managing due diligence processes across strategic, financial, and functional diligence which – among other areas and topics – include the review of M&A targets’ Risk, Information Security, Compliance, Data protection and HR policies and procedures. To arrange compliance, Deutsche Börse Group regularly involves legal and other advisors in conducting such due diligence processes.

## 4. Grievance Mechanism

We encourage our stakeholders to (anonymously) report known or suspected violations via our [whistle-blower system](#).

With our whistle-blower system, we want to facilitate that persons who report violations in good faith receive the greatest possible confidentiality and the greatest possible protection against actual or threatened retaliation or reprisals because of the information they provide.

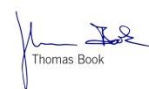
## 5. Governance and reporting

We review and update this Statement on Human Rights periodically to reflect emerging best practices within our industry. This Statement is approved by senior management. We communicate internally and externally on human rights, and we conduct trainings for employees as needed on our human rights approach and related policies. We engage with a variety of stakeholders on human rights related issues, and we report on our progress on our website.

This Statement has been examined and approved by Deutsche Börse AG’s Executive Board on 21st July 2023.

  
Theodor Weimer

  
Christoph Böhm

  
Thomas Book

  
Helke Eckert

  
Stephan Leithner

  
Gregor Pottmeyer