

Corporate Engagement Policy

Guidance on Corporate Responsibility & Citizenship activities

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Internal

Table of Content

1	Executive summary	2
2	Introduction	2
2.1	Purpose of this policy	2
2.2	Ownership/Responsibility	2
2.3	Scope of application	3
3	Principles of engagement	3
4	Areas of engagement	3
4.1	Education and culture	3
4.2	Social cohesion	3
4.3	Sports	4
5	Instruments of engagement and how to apply them	4
5.1	Non-business-related sponsoring	4
5.2	Donations	4
5.2.1	Donations made by Deutsche Börse	4
5.2.2	Privately organised fundraisers	5
5.3	Personal commitment	5
5.4	Memberships	5
6	Procedure and approval	6
6.1	Approval process	6

1 Executive summary

This Corporate Engagement Policy lays down binding principles and standards for all corporate engagement-related activities at Deutsche Börse Group.

It creates a cohesive, aligned and effective organisation-wide corporate responsibility and citizenship framework and prevents any damage to the company'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.

2 Introduction

The Deutsche Börse Group Corporate Engagement programme covers a specific part of the Group's environmental, social and governance (ESG) efforts. 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 Deutsche Börse Group Corporate Engagement programme is concerned with managing the activities of Deutsche Börse Group that cover the scope of giving back to the community, taking part in philanthropic causes, and providing positive social value.

At Deutsche Börse Group, we see corporate engagement as an ongoing commitment towards our shareholders, our 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 Deutsche Börse 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 the prevention of said activities causing potential damage to the reputation of Deutsche Börse Group or constituting a violation of established compliance rules.

2.2 Ownership/Responsibility

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

This policy is reviewed at least annually.

2.3 Scope of application

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

3 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 at one or more of our 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 Deutsche Börse 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 Deutsche Börse AG and its entities as good corporate citizens.

4 Areas of engagement

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

4.1 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 the cultural legacy.

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

In the cultural area, the emphasis is on contemporary photography via the [Deutsche Börse Photography Foundation](#).

4.2 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, equal opportunities, digital transformation. Preference is given to approaches in which corporates, politics and society work together.

4.3 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 Deutsche Börse Group's reputation.

5 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.

5.1 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 our Legal and Compliance teams. Non-business-related sponsoring is particularly effective when it is provided medium-term or long-term and is incorporated in Deutsche Börse Group's overall corporate communication.

- The project must be in line with at least one of the three areas of engagement.
- Deutsche Börse AG or one of its entities 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 that of Deutsche Börse Group. Projects in which a direct competitor would be a co-sponsor should be avoided.
- Deutsche Börse Group sponsors institutions or events, not individuals.
- No conflict of interest arises from the non-business-related sponsoring.

5.2 Donations

5.2.1 Donations made by Deutsche Börse

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.

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- 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.

5.2.2 Privately organised fundraisers

Privately organised fundraisers by Deutsche Börse Group staff are supported by this policy. However, in order to protect the integrity of Deutsche Börse 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, Deutsche Börse or one of its entities 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 Corporate Communications & Engagement.

5.3 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 Deutsche Börse 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.
- 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 must arise from personal commitment.

5.4 Memberships

Deutsche Börse 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 Deutsche Börse Group, in any case at least for the respective business area. Terms and conditions of the membership are clearly defined in advance and approved by our Legal and Compliance teams.

- 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 contracts must be terminable on an annual basis.
- No conflict of interest must arise from the membership.

6 Procedure and approval

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

6.1 Approval process

To contribute to an 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 consult the Code of Business Conduct, Anti-Corruption Policy and Policy on Conflicts of Interest.

All corporate engagement activities as described in this policy must be sent for approval to the owner of this policy. They must be sent via e-mail to: corporate.engagement@deutsche-boerse.com

The following approval criteria are applied:

- 1) The project follows the principles of our commitment
- 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 fulfil a minimum score concerning the two principles of our commitment which is recorded by an internal measuring instrument and criteria 2), 3), 4), 5) and 6) are met without exception.