



Inclusive Workplace Guideline

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1. Purpose, Objectives and Basis

1.1. Purpose and Objectives

Openness is one of our core values at Deutsche Börse Group (“**DBG**”). Our leadership is proactively committed to inclusion and to fostering equal opportunities for all employees. We treat each other with respect and appreciation, recognizing that diverse ideas and perspectives truly enrich our organization.

The various personal and professional backgrounds of employees should be promoted and protected within DBG to create a safe working environment in which the diverse potential of employees can develop.

This document (“**Guideline**”) defines the minimum requirements to facilitate an inclusive workplace.

This Guideline is in the responsibility of DBAG Human Relations – HR Global Business Partner Department and will be published as well as developed further by this department.

1.2. Basis of this Written Rule

Considering the definitions of the Written Rule Framework Guideline (chapter 3 - Definitions and Requirements), this written rule is a “Guideline” because the three categories (External Requirements, High Risk Activities, Strategy of DBAG) for a “Policy” do not apply.

2. Scope and Target Groups

2.1. Functional Scope of applicability

Entity	Deutsche Börse AG (“ DBAG ”) and/or adopting legal entities within DBG
Area	All areas

Table 2: Scope

2.2. Target groups

Target group	Key message
All Employees (including members of executive boards, interns, apprentices, students, temporary staff and service providers)	... should be aware of the Inclusive Workplace Guideline and procedure meaning that infringements can lead to an investigation and, if necessary, to disciplinary measures.

Table 3: Target groups

3. Definitions

Term	Definition
Employee	Any individual who is in an employment relationship with a legal entity of DBG according to national law or practice.
Inclusive Workplace	A workplace where a culture of openness and respect is fostered.

Table 4: Definitions

4. Minimum Requirements

DBG demands commitment to the Guideline throughout its workforce. An inclusive workplace creates a safe environment where diverse perspectives – personal and professional – are actively sought and integrated, facilitating company decisions reflect the full spectrum of available insights.

DBG recognizes that a wealth of backgrounds and ideas is key to its success and thrives on openness and fairness.

All employees are expected to contribute to fostering an inclusive workplace at DBG where employees have equal opportunities by:

- Respecting and adhering to DBG's values, especially "Openness";
- Embracing the leadership principles;
- Maintaining zero tolerance for any form of harassment or discrimination in our work environment and between individuals.

In addition, Employee Networks/Resource Groups contribute to foster inclusion at DBG. These networks and the initiatives they promote and organize are open to all DBG employees, not solely those affiliated with the group the network nominally represents. Employees that join and invest in these groups should be encouraged and recognized by their managers.

5. Roles and Responsibilities

5.1. Human Relations

Human Relations is responsible for drafting, maintaining and publishing this Guideline.

5.2. Legal Entities

To comply with specific (local) legal and/or regulatory requirements, where applicable, legal entities may - in addition to this Guideline - create and implement their own written rules which must not conflict with this Guideline, unless required by local law, notably to impose more stringent or specify (local) requirements.

6. Appendix

6.1. Contact Information

Written Rule Owner: Head of HR Global Business Partner.

DBAG Human Relations – HR Global Business Partner Department is the owner of this Guideline and the first point of contact for the defined minimum requirements.

6.2. Document History

Document History

Version	Date	Changes & Background
1.0	14.04.2025	Initial version

Coordination before publication

Version	Date	Task	Function
1.0	14.04.2025	Creator	People Strategy & Initiatives
	27.06.2025	Content Review	Senior HR Global Business Partner
	9.07.2025	Content Confirmation Written Rule Owner	Head of HR Global Business Partner

Approvals

Version	Date	Task	
1.0	28.09.2025	Approval	Head of HR Global Business Partner

6.3. Related Written Rules

Superordinated Written Rules	<ul style="list-style-type: none"> N/a
Subordinated Written Rules	<ul style="list-style-type: none"> N/a

6.4. Supporting Documents

Supporting Documents	<ul style="list-style-type: none"> Anti-Harassment Guideline Disciplinary Action Guideline
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