

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 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. Introduction

At Deutsche Börse Group, we hold ourselves to the highest standards of integrity. This plays a critical role in fulfilling our purpose to create trust in the markets of today and tomorrow; in achieving our goal of fostering the prosperity of customers and communities, and our vision of being one of the most trusted and successful financial market institutions in the world. Our values and code of business conduct guide us and set expectations for our behaviour and decision-making – **at all times**.

Deutsche Börse Group is fully committed to respect human rights and to take the actions set out in this Statement to fulfil its responsibilities as set by 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;
- 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.

These standards and principles are implemented in our Group-wide HR and Compliance policies and in [code of business conduct](#).

In case of a conflict between this Statement and local laws, rules or regulations, the more restrictive provisions shall apply.

2. Our approach

Deutsche Börse Group is a leading financial institution focused on empowering the people and companies driving investment, trade and the creation of wealth across the world. It is our purpose to create trust in the markets of today and tomorrow. By making markets work, we foster growth and contribute to the prosperity of future generations. For us, sustainability is about creating long-term value for our shareholders, working in partnership with our clients to make a positive economic and social contribution in the markets where we operate. We recognise that our success as a market infrastructure provider is linked intrinsically to the health and prosperity of these markets.

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.

It applies across all operations of Deutsche Börse Group and all of its consolidated entities, including our relationships with employees, suppliers and customers.

3. Commitments

Everyone deserves to be treated fairly, with respect and with dignity. We are committed to providing a safe and healthy work environment that is free from discrimination, harassment, and retaliation. We do not tolerate discrimination, harassment or retaliation by employees, suppliers, business partners or customers. This includes 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.

3.1 Employees

All employees regularly receive trainings 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 training concerning issues related to diversity and inclusion.

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 enforce these policies and standards by providing multiple ways for our employees to report concerns, including an anonymous reporting option (see below under 4), 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 www.deutsche-boerse.com > Sustainability > Our ESG profile > Employees.

3.2. Suppliers

In an effort to mitigate the risk of human rights violations (such as human trafficking, forced labor, child labor, discrimination) in our supply chain, our suppliers are contractually bound by standards of ethical conduct when dealing with their employees, their suppliers, customers and other third parties. To this end, Deutsche Börse Group has introduced a code of conduct for suppliers, which comprises a comprehensive set of ESG criteria.

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

Furthermore, suppliers responsible for 90 per cent of

the procurement volume 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](#) and on the website www.deutsche-boerse.com > Sustainability > Our ESG profile > Procurement Management.

3.3 Customers

Deutsche Börse Group has policies to prevent the illegal use of our products and services, including abuse that may result in human rights violations. These policies include a rigorous Customer Due Diligence process. Similar to our supplier policies, we expect compliance with applicable regulations and we continuously work within Deutsche Börse Group and with our customers to ensure such compliance and further pursue standards and principles of social and ethical responsibility even beyond binding regulatory requirements.

4. Grievance Mechanism

Our goal at Deutsche Börse Group is to avoid illegal or unethical behavior in all business relationships. For this reason, we encourage our stakeholders to anonymously report known or suspected violations via our [whistle-blower system](#).

With our whistleblower system, we want to ensure 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 as a result 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 and reviewed by the Sustainability Board of Deutsche Börse Group, which receives reports from

management and advises on the company's sustainability policies and programmes, including human rights. 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 13th July 2021.



Theodor Weimer



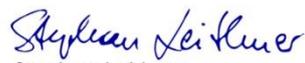
Christoph Böhm



Thomas Book



Heike Eckert



Stephan Leithner



Gregor Pottmeyer