

Policy statement on the Human Rights Strategy of Deutsche Börse AG

(Version of 16 December 2022)

Our commitment to human rights

Fair working conditions in international supply chains are the foundation of prosperity in a globalised world. For this reason, human rights must be respected, observed and protected throughout companies' supply chains – such action is a fundamental aim of Deutsche Börse AG as well.

For many years, we have been committed to protect human rights and the environment as part of our relationships with suppliers. Our commitment to human rights is firmly incorporated into our corporate culture and our values, and is reflected in our internal company policies and actions. Our commitment is thus an essential part of our company's mission – creating trust in the markets of today and tomorrow.

This policy statement discusses our priorities regarding human rights risks, the observance of these risks in supplier relationships and potential adjustments. It describes the standards that we expect our suppliers and employees to comply with in accordance with the German Supply Chain Due Dilligence Act (Lieferkettensorgfaltspflichtengesetz) of 16 July 2021. The policy statement applies to all aspects of the business operated by Deutsche Börse AG.

Our priorities

Our priorities are derived from the priority human rights and environmental risks we have identified and are reflected in the expectations we place on our suppliers. Moreover, we strive to reduce environmental risks because they can also indirectly lead to violations of human rights.

Priority human rights and environmental risks

Deutsche Börse AG continuously assesses areas in its supply chains where human rights and environmental risks exist. We work closely with customers and external service providers in this process to evaluate and appropriately manage the impact of our business decisions. We consider discrimination, the failure to apply appropriate occupational health and safety measures and the refusal to pay fair wages as priority risks.

The risk analysis is updated at least once a year and on an ad hoc basis. The identified priority risks are also reflected in our expectations for suppliers and employees.

Our expectations for suppliers and employees

Our goal is to manage and reduce the risk of human rights violations and environmental risks in our supply chain. With this aim, we require our suppliers to make a contractual commitment to the observance of ethical standards of conduct in their dealings with employees, suppliers, customers and other third parties. In particular, the priority risks described above are observed closely at all of our *business locations* that fall within the scope of application. All of this is done in accordance with our *Human Rights Statement*, the *Code of Conduct for Suppliers*, our *Code of Conduct for Business*, the *Deutsche Börse Group Statement on Environmental Protection* and our annual commitment to the *UK Modern Slavery Act*. We work systematically to ensure that no form of corruption, discrimination, harassment, forced labour or child labour occurs in our supply chains. We also pay close attention to ensure that our suppliers comply with local labour and human rights laws at their business locations.

Implementation

The risks identified above are addressed in our internal processes that are outlined in this section. Our supplier screening process initially includes the analysis and management of risks, their prevention, interaction with direct suppliers and impact measurement. Other activities include remedial action and grievance procedures, interaction with indirect suppliers and our documentation processes.

Risk management and analysis

All of our efforts aim to identify potential and actual human rights and environmental risks and the adverse impacts of our business activities on people along the entire value chain. For this purpose, Deutsche Börse AG identifies and evaluates relevant human-rights and environmental issues, individuals who could be potentially affected by our business activities and our direct and occasion-related indirect business relationships. This also includes the analysis of both human rights and environmental risks as well as the impact of the use of our products and services on third parties. The Executive Board of Deutsche Börse AG and other relevant managers are regularly informed about the results of the risk analysis, which is conducted at least once a year and on an ad hoc basis.

Deutsche Börse AG has set up a risk-management system to ensure the appropriateness and the effectiveness of the due diligence measures implemented with regard to human rights and environmental risks in its own operations and among its suppliers.

For its **risk analysis**, Deutsche Börse AG has set up a risk radar as an internal process in cooperation with an external service provider, which identifies and assesses human rights and environmental risks at suppliers in the supply chain, taking a systemic and proactive approach across all ESG dimensions. In the event of a risk occurring, the early warning system issues alerts, which are then manually evaluated on a case-by-case basis. In addition, Deutsche Börse AG maintains an active dialogue with the contracting parties on a regular basis and as required. Group Compliance assumes a supervisory function in this.

Prevention in the company's own operations and towards direct suppliers

Appropriate preventive or, in consideration of the specific case involved, corrective measures are introduced on the basis of the identified risks and possible violations. These measures include in particular

- The implementation of the human rights strategy set out in the policy statement in relevant business processes
- The development and implementation of appropriate procurement strategies and purchasing practises that will avoid or mitigate identified risks
- The training of employees in each relevant business area
- Controls that are based on a risk profile and used to assess compliance with the human rights strategy contained in the policy statement in Deutsche Börse's own operations.

Measurement of effectiveness

Deutsche Börse AG will conduct a review at least once a year or for a specific reason to evaluate the appropriateness and effectiveness of its measures in order to prevent or reduce adverse human rights and environmental impacts. For this reason, Deutsche Börse AG has implemented a range of processes in order to proactively and systematically identify and monitor potential human rights violations. They cover both Deutsche Börse AG's business activities and its value chain and the associated business activities, and are reviewed systematically and regularly along the identified priority human rights and environmental risks identified.

These measures also include information from the complaints procedure.

Remedial action

We rely on the interplay of various measures to meet our responsibility for the observance of human rights and environmental risks. The goal of these measures is to protect (potentially) affected individuals and prevent adverse human rights and environmental impacts. If a risk has already materialized in the company's own business unit or in the business unit of a direct supplier, our goal is to minimise its impact. To this end, we have established uniform processes ranging from various escalation levels (including warnings) to the termination of a business relationship in the event of serious violations. The effectiveness of these remedial actions is reviewed at least once a year and on an ad hoc basis.

Grievance procedure

Deutsche Börse AG practises a zero-tolerance policy in terms of unethical behaviour in business. Whenever we learn of a violation of the values of Deutsche Börse's human rights policy, we will work on a collaborative basis with our employees and suppliers to correct the violation and help to prevent future incidents.

In order to detect (potential) violations, we established a grievance procedure via the whistleblower system of the BKMS platform through which our employees and other stakeholders can (anonymously) report known or suspected violations. Our aim is to ensure that individuals who report violations in good faith receive the utmost confidentiality and the greatest possible protection from actual or potential retaliation or reprisals arising from the information they provide.

Indirect suppliers

The grievance procedure also applies to indirect suppliers. If a complaint is lodged risk analysis and preventive measures in the sense of the above requirements are applied, a corrective action plan is drawn up and the policy statement is updated if necessary. The same applies if Deutsche Börse AG otherwise becomes aware of factual indications which give rise to the possibility of a violation of a human rights-related or an environmental obligation at indirect suppliers.

Documentation and reporting requirements

We internally document how we fulfil our due diligence obligations. In addition, we regularly inform the public about our human rights and environmental risks as well as about our measures and voluntary commitments and their effectiveness. This report is reviewed by the Executive Board of Deutsche Börse AG, which is assisted by the *Group Sustainability Board*.

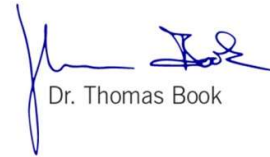
Furthermore, we conduct training for employees and suppliers on our human rights approach and environmental risks in line with the above priorities and related policies, as required. We also engage with a wide range of stakeholders on human rights issues and environment-related risks through our annual materiality analysis and report on our progress on our website.

Amendment provisions

Deutsche Börse AG regularly reviews and updates its policy statement once a year and on occasional basis. This document was approved by the Executive Board of Deutsche Börse AG on 16 December 2022 upon the recommendation of the *Group Sustainability Board*.


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