

UK Modern Slavery Act

Statement on Transparency for 2024

Preamble

Deutsche Börse Group pursues to protect and uphold human rights around the world in relation to our business model. 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.

Deutsche Börse AG as holding company of Deutsche Börse Group endorses the UK Modern Slavery Act 2015 by publishing a statement under section 54 of this legislation to outline the steps taken to prevent slavery and human trafficking in its own operations and supply chains.

This Statement refers to Deutsche Börse Group's fiscal year ending on 31 December 2024 and covers the following legal entities pursuing business activities in the United Kingdom:

- Deutsche Börse AG
- Eurex Frankfurt AG
- Eurex Clearing AG
- 360 Treasury Systems AG
- European Energy Exchange AG
- Axioma (US) Inc.
- SimCorp A/S
- Clearstream Banking S.A.
- Clearstream Banking AG
- Clearstream FundCentre AG
- European Commodity Clearing AG
- European Commodity Clearing Lux S.à r.l.
- EPEX Spot SE

About Deutsche Börse

Deutsche Börse AG, which is headquartered in Frankfurt/Main, Germany, is the parent company of Deutsche Börse Group. As of 31 December 2024, the Group employed 15,495 people at more than 60 locations worldwide. As one of the largest providers of market infrastructure worldwide, we offer our clients a broad range of products and services. These cover the entire process chain of financial market transactions: from ESG business, indices, portfolio management software and analytics solutions (data & analytics) to trading and clearing services and related price and reference data (trading & clearing), transaction settlement, securities and fund custody, and liquidity and collateral management services (fund services and securities services). We also develop and operate the IT systems that support all these processes. In addition to securities, our platforms are used to trade derivatives, commodities, foreign exchange and digital assets.

Our business takes place in three segments: Investment Management Solutions, Trading & Clearing, and Post Trade. This structure is used for internal Group controlling and forms the basis for our financial reporting.

For those Group entities subject to the German Supply Chain Due Diligence Act

(Lieferkettensorgfaltspflichtengesetz, short: LkSG), most direct suppliers are located in Germany, followed by Luxembourg, the United Kingdom, the United States and Switzerland. The top five industries in which suppliers operate include computer programming, consultancy and related activities, legal and accounting activities, financial service activities, management consultancy activities, and data processing, hosting and related activities.

Our purpose and values

Deutsche Börse Group's business activities are based on the legal frameworks and ethical standards of the different jurisdictions in which it operates. 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.

Fair working conditions in international supply chains are the foundation of prosperity in a globalized 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 Group as well.

Deutsche Börse Group is dedicated to keeping its operations and supply chain free of modern slavery and human trafficking. Our human rights related efforts aim to fulfil our social responsibility in line with international standards and principles. The Group emphasizes this by joining initiatives and organizations that stand for widely accepted ethical standards. Among these are Deutsche Börse Group's commitments as members of the United Nations Global Compact, and as signatory of the Diversity Charter and the International Labour Organization's Labour Standards.

Our Actions

For many years, we have worked to promote and protect human rights within our own operations and as part of our relationships with suppliers. To support our efforts, various measures to analyze, manage and mitigate the risk of human rights violations, including modern slavery, have been introduced by Deutsche Börse AG and designated Group entities as specified throughout the following paragraphs.

Several of the below-described measures have been implemented by Deutsche Börse AG in line with the LkSG. These apply to LkSG-relevant entities, meaning Deutsche Börse AG and Group entities within Deutsche Börse AG's own business area as defined in § 2 para. 6 of the LkSG. For more information, please refer to Deutsche Börse AG's [Report on the Supply Chain Due Diligence Act](#).

Twice a year, an assessment of potential human rights and environmental risks is performed for LkSG-relevant entities and their direct suppliers. For Deutsche Börse AG's own business area, no LkSG-relevant risks, including modern slavery, were identified. Priority risks identified among direct suppliers relate to disregard for occupational safety and work-related health hazards.

To identify and assess risks related to direct suppliers of LkSG-relevant entities, a supplier risk assessment has been set up in cooperation with an external service provider. This assessment considers environmental and human rights factors, including modern slavery and child labor, in the context of the suppliers' industry and country and identifies high-risk suppliers. Further steps for suppliers with a higher risk involve the "Supplier Self-Assessment", where suppliers are asked to provide additional information about their human rights and environmental efforts, as well as the initiation of appropriate escalation procedures, if needed. In addition, human rights related training materials in line with the LkSG are available for all employees and dedicated trainings are organized for selected employees and suppliers classified as high-risk suppliers.

To continuously monitor human rights issues related to suppliers of LkSG-relevant entities, a tool-based

“Negative News Screening” process has been introduced. Whenever the tool identifies adverse media or negative news that could indicate LkSG-related environmental or human rights violations by direct and indirect suppliers, Deutsche Börse AG receives a notification. Potential violations are investigated on a case by case basis and further measures are taken, if needed. In addition, an active dialogue with the respective supplier is maintained. A designated supervisory function carries out controls to assess compliance with the due diligence requirements of the LkSG.

Furthermore, Deutsche Börse AG and centrally serviced entities¹ have introduced a [Code of Conduct for suppliers](#) to address human rights risks in the supply chain already in the early stage of the supplier onboarding process. Accordingly, suppliers are expected to adhere to standards of ethical conduct when dealing with their employees, suppliers, customers and other third parties. Amongst other requirements, suppliers are expected not to engage in forced labor, child labor, exploitation, or human trafficking.

Although we consider the risk of human rights violations, including forced and child labor, to be more prevalent in our supply chain, Deutsche Börse Group has implemented measures to mitigate such risks within our own operations as well. These actions start with our employee selection process, which includes safeguards against certain human rights violations, such as child labor. Other measures comprise our [Code of Business Conduct](#), which all employees of Deutsche Börse Group are obliged to comply with, and which addresses the protection and preservation of human rights among numerous principles.

Grievance procedure

Deutsche Börse Group practices a zero-acceptance policy in terms of unethical behavior in business. Whenever we learn of a violation of the values of Deutsche Börse Group’s Code of Business Conduct, including human rights, we 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 platform through which our employees and other stakeholders can (anonymously) report known or suspected violations. Our aim is to arrange 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. The grievance procedure also applies to third parties, including indirect suppliers. If a complaint is lodged, the risk analysis and preventive measures in line with the above-described requirements are applied, a corrective action plan is drawn up and the [Policy statement on the Human Rights Strategy of Deutsche Börse AG](#) is updated, if necessary. The same applies if Deutsche Börse Group otherwise becomes aware of factual indications which give rise to the possibility of a violation of a human right at third parties, including indirect suppliers.

Approval of this statement

Deutsche Börse Group’s stance on the UK Modern Slavery Act 2015 is reviewed on a yearly basis; the Executive Board of Deutsche Börse AG decides on potential changes in policy, if necessary. This statement has been examined and approved by Deutsche Börse AG’s Executive Board on 23rd of May 2025.



¹ 'Centrally-serviced' means those Group entities that have outsourced their purchasing processes (and serviced commodity groups) to Deutsche Börse AG.

Dr. Stephan Leithner
Chief Executive Officer, Deutsche Börse AG

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Deutsche Börse AG
60485 Frankfurt/Main
Germany

www.deutsche-boerse.com

group-sustainability@deutsche-boerse.com