

Public Rules of Procedure

For the submission and processing of human rights and environmental complaints under the German Supply Chain Due Diligence Act (LkSG)

1 Introduction

The success of the Deutsche Börse Group is based on the trust of customers, employees, suppliers and shareholders as well as the public. To maintain this trust, compliance with human rights-related and environmental obligations within our supply chains makes an essential contribution.

In this context, Deutsche Börse AG (DBAG) has established a complaints procedure for the Deutsche Börse Group in accordance with sections 8 and 9 of the LkSG.

This complaints procedure enables any natural or legal person to report human rights-related and environmental risks and violations within DBAG's own business area as well as at its direct and indirect suppliers.

In the event of any discrepancies or interpretative uncertainties between the language versions, the German version of this Public Rules of Procedure shall prevail.

2 Communication Channels

Complaints may be submitted via the whistleblowing system in text form or by telephone while maintaining anonymity. In addition, complaints may be submitted to humanrightsofficer@deutsche-boerse.com.

Complaints can be submitted 24/7 and irrespective of location in German, English and French and are free of charge.

Answering the questions shown in Annex I as precisely as possible supports the processing of the complaint.

3 Procedural Principles

a) Confidentiality

DBAG is obliged to maintain the confidentiality of the identity and to ensure effective protection against disadvantage or punishment as a result of the complaint. The disclosure of personal or case-related information is permitted solely on the basis of the need-to-know principle and only if this is

necessary for the proper conduct of the investigation or to fulfil statutory obligations.

b) Principle of a fair procedure

The principle of a fair procedure obliges DBAG to manage the process transparently. Affected persons have the right to present their perspective and to provide relevant information. The investigation must not be conducted with preconceived assumptions; rather, it must be open-ended and unbiased and must not give the impression that the outcome has already been determined.

c) Presumption of innocence

The presumption of innocence applies during the investigation.

d) Principle of objectivity

Incriminating as well as exculpatory information must be examined and documented with equal care. Investigations must be fact-based and must not be geared towards a specific outcome. This principle ensures that decisions are based on a fair and comprehensible assessment of the facts.

4 Process for Handling Complaints

The case handler confirms receipt of the complaint within seven calendar days of receiving the complaint and informs the complainant about the next steps of the procedure, the timeline and their rights. This does not apply if, during the initial assessment, the case handler determines that the complaint pursues purely promotional purposes or is manifestly unfounded.

If, in the course of the investigation, the case handler determines that the matter indeed lies within DBAG's supply chain and that either a violation of human rights-related or environmental obligations or corresponding risks threaten, are imminent or have occurred, appropriate remedial measures and/or preventive measures must be initiated without delay in order to prevent, end or minimise the extent of a violation or risk.

The outcome of this assessment, including any preventive or remedial measures defined, is documented in a report prepared under the four-eyes principle. Compliance with and effectiveness of the defined measures are monitored regularly.

After completion of the investigation, the complainant is informed of the outcome and the defined measures, provided that internal processes are not impaired or third-party rights – in particular those of the persons named in the investigation – are not violated.

The effectiveness of the complaints procedure is reviewed as required, but at least annually.

5 Responsible Department and Contacts

The Group Compliance Oversight department of DBAG is responsible for processing complaints under the LkSG. The Human Rights Officer is involved where and insofar as required.

Contacts for general questions about the complaints procedure are:

- Marc Peter Klein (Chief Compliance Officer and Human Rights Officer):
Email: marc.peter.klein@deutscheboerse.com
- Miriam Schmitz (Head of Group Compliance Oversight):
Email: miriam.schmitz@deutscheboerse.com

For submitting a complaint, please use exclusively the complaint channels mentioned in section 2!

Annex I

Please describe the matter in as much detail as possible. The following information may help you:

What happened?

When did it happen?

Which person(s) are affected?

Which company(ies) of the Deutsche Börse Group are affected?

Which supplier is affected?

Where, in which area, at which location did the incident occur?

Is a specific production site, department or location affected?

Has the incident already occurred?

Is the incident still ongoing?

When did the incident occur for the first time?

How severe are the consequences of the incident?

Has a complaint already been filed elsewhere? If yes, where or with whom?

Note: If evidence such as photos, videos or documents is available, please be sure to attach it to your complaint.