Human Rights

(Version of 19 November 2026)

Deutsche Börse Group Statement on Human Rights

Deutsche Börse Group is committed to protecting and upholding human rights around the world as described herein. 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 accountable.

We aim to create an environment where respect is shown and where we do not accept any form of corruption, discrimination, harassment, forced or child labor. Furthermore, we are committed to complying 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.

In this context, we strive for compliance with a wide range of international 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;
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- Principles of the UN Global Compact;
- OECD Guidelines for Multinational Enterprises.

1. Commitments

Deutsche Börse Group is committed to providing a safe and healthy work environment. We do not accept discrimination, harassment, or retaliation by employees, suppliers, business partners, or customers. We uphold the freedom of association and the rights to collective bargaining, promote equal remuneration, and respect other rights such as data privacy. Finally, we seek to prevent modern slavery, child labor, and human trafficking in our own operations and supply chain.

1.1. Employees

We believe inclusion and equal opportunities in our own workforce 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 interact with one another with openness and confidence, respect the life choices of others, and intervene when witnessing any sort of discrimination or abuse. Furthermore, we do not accept degrading or offensive comments or jokes, bullying, violence, intimidation, or threats.

1.2. Suppliers

Respecting human rights does not stop at our own employees but also includes our supply chain. Deutsche Börse Group observes the provisions to protect human rights in its supply chain in line with the German Supply Chain Act (in German: Lieferkettensorgfaltspflichtengesetz, short: LkSG), as well as with the standards referenced therein, including those set by the International Labour Organization (ILO) in connection with the Universal Declaration of Human Rights of the United Nations.

1.3. Clients

Deutsche Börse Group strives to prevent the illegal use of our products and services, including abuse that may result in financial crimes and other criminal offences. We have implemented policies that address related issues, such as trade sanctions, anti-money laundering, and counter terrorist financing. We expect compliance with applicable regulations, and we continuously work within Deutsche Börse Group and with our customers to facilitate such compliance and further pursue standards and principles of social and ethical responsibility.

2. Due Diligence / Control Framework

Deutsche Börse Group has implemented processes to identify human rights risks in a proactive and systemic manner. These processes relate to our own operations and our supply chain and are systematically and periodically reviewed.

2.1. Own workforce

To address human rights risks that occur within our own workforce, Deutsche Börse Group has introduced various actions. Among these are our Inclusive Workplace Guidelineand a dedicated Council, which provide a Group-wide framework and guidance for all inclusion-related topics. The members of the Council act as persons of trust and promote measures that foster inclusion within the Group.

Our Anti-Harassment Guideline/Procedure defines our position that we do not accept any kind of harassment and provides key standards in compliance with the Code of Business Conduct and the Inclusive Workplace Guideline. The Guideline/Procedure includes the recommended procedure towards managing harassment and mentions disciplinary actions to prevent the offenders from repeating their behavior.

Our employees are asked to participate once per year in an anonymous online survey about their satisfaction with Deutsche Börse Group as an employer. During this process, employees provide feedback on various aspects of the organization and their work environment, and they can make any suggestions for improvement. The results of this annual survey are published in the annual report and considered for further improving our employee satisfaction.
To mitigate the risk of discrimination and other illegal or unethical behavior, Deutsche Börse Group provides mandatory compliance trainings for employees on a regular basis. This comprises trainings on workplace conduct that convey our expectations for a culture of decency and respect, including trainings concerning issues related to diversity and inclusion. In addition, we regularly carry out trainings on business conduct related topics, such as anti-

money laundering, trade sanctions, anti-corruption, conflict of interest, market abuse, data privacy, and information and corporate security. These topics are also addressed in internal policies.

Besides training measures to raise awareness among our employees, we put our human rights-related policies and standards into effect by providing multiple ways for our employees to report concerns, including an anonymous reporting option (cf. **3. Grievance mechanism**), by investigating the concerns we receive, and by holding individuals accountable for their behavior.

Beyond that, Deutsche Börse Group is committed to complying with all current HR-related applicable legal requirements. Therefore, topics like freedom of association, the right to collective bargaining, working hours, and wages are not specifically addressed in this document, as they are respected in line with local regulations and location-specific internal standards.

For more information about our activities to protect human rights of our own workforce, please refer to our annual report and the Deutsche Börse Group website.

2.2. Supply Chain

To address human rights risks related to the supply chain, including corruption, discrimination, forced and child labor, Deutsche Börse AG and centrally-serviced entities (i.e. Group entities that have outsourced their purchasing processes and serviced commodity groups to Deutsche Börse AG) have introduced a Code of Conduct for their suppliers. Accordingly, suppliers are contractually bound by standards of ethical conduct when dealing with their employees, their suppliers, customers, and other third parties.

Furthermore, suppliers of Deutsche Börse AG and Group entities within Deutsche Börse AG's own business area as defined in § 2 para. 6 of the LkSG are monitored and reviewed with respect to various risk criteria, including human rights concerns, in cooperation with an external service provider. This risk analysis helps us to identify human rights risks in our own business area and among our suppliers.

More details on our expectations towards suppliers and the implementation of human rights principles in procurement can be found in the Code of Conduct for Suppliers, the Statement on the Deutsche Börse Group Human Rights Strategy according to the German Supply Chain Act, the Statement of Deutsche Börse Group on the UK Modern Slavery Act, and on the Deutsche Börse Group website.

2.3. Mergers & Acquisitions

Deutsche Börse Group's Group Strategy and M&A department manages the process to identify risks related to potential acquisitions targets. We have a proven track record of managing due diligence processes across strategic, financial, and functional diligence, which – among other areas and topics – include the review of M&A targets' risk, information security, compliance, data protection, and HR policies and procedures. To achieve compliance, Deutsche Börse Group regularly involves legal and other advisors in conducting such due diligence processes.

3. Grievance Mechanism

We encourage our stakeholders to (anonymously) report suspected violations or risks via our whistle-blower system.

Our whistleblower system aims to ensure that individuals who raise leads in good faith are protected from actual or threatened retaliation or reprisals because of the information they provide.

4. Governance and reporting

We review and update this Statement on Human Rights periodically to reflect emerging best practices and evolving statutory provisions within our industry. This Statement is approved by executive management. We communicate internally and externally on human rights, and we conduct trainings for employees covering also human rights and related policies as needed. We engage with a variety of stakeholders on human rights related matters, and we report on our progress on our website.