

Policy statement on the Human Rights Strategy of Deutsche Börse AG

(Version of 09 December 2025)

Our commitment to human rights

Fair working conditions in supply chains are the foundation for prosperity in a globalized world. Therefore, it is essential that human rights are considered holistically, respected and protected along the supply chain of companies – this is also a key concern for Deutsche Börse AG.

We have been committed to protecting human rights and the environment within the scope of our supplier relationships for many years. This commitment is firmly anchored in our corporate culture and values and is reflected in our internal corporate policies and actions. Thus, our commitment is an integral part of our corporate purpose – to create trust in the markets of today and tomorrow.

This policy statement addresses, in accordance with § 6 para. 2 of the German Act on Corporate Due Diligence Obligations in Supply Chains (German: Lieferkettensorgfaltspflichtengesetz, short LkSG), (1) a description of the procedure by which Deutsche Börse AG fulfils its corresponding obligations, (2) the priority human rights and environmental risks identified on the basis of our risk analysis, and (3) the human rights and environmental expectations that Deutsche Börse AG places on its employees and suppliers in the supply chain, also determined on the basis of the risk analysis.

(1) Description of procedures

Our procedure for minimizing human rights and environmental risks in our supply chains includes identifying and assessing risks and implementing appropriate preventive measures. Further activities comprise the initiation of remedial actions in the event of a breach of a human rights or environmental obligation, the introduction of an LkSG-specific complaints procedure, and the management of indirect suppliers.

1.1 Risk management and analysis

Deutsche Börse AG conducts a risk analysis twice a year and on an ad hoc basis for its own business operations and for direct suppliers to identify human rights and environmental risks. Particular attention is paid to industry- and location-specific risk factors of the respective suppliers to identify those with elevated risk. Here, we work closely together with external service providers to assess and appropriately manage the impact of our business decisions. The Executive Board of Deutsche Börse AG and relevant stakeholders are regularly informed about the results of the risk analysis.

In addition, a system-supported process for monitoring violations of human rights or environmental obligations has been introduced, which includes screening negative media reports (“Negative News Screening”) related to suppliers identified as high-risk within the scope of the above-mentioned risk analysis. Whenever the system detects indications of such violations, Deutsche Börse AG is notified. These notifications are reviewed on a case-by-case basis, and further measures are taken as described in section 1.4, if necessary.

Moreover, Deutsche Börse AG enters into an active dialogue with the respective suppliers in the event of an elevated human rights or environmental risk or an indication of a breach of human rights or environmental obligations.

The appropriateness and effectiveness of the implemented measures are reviewed as part of Deutsche Börse AG’s risk management process.

1.2 Preventive measures

To fulfill our responsibility to uphold our human rights and environmental due diligence obligations, we rely on a combination of different measures.

To prevent and minimize human rights or environmental risks, Deutsche Börse AG implements preventive measures both within its own business operations and in relation to its direct suppliers. The measures within our own operations include in particular:

- the publication of this policy statement and the implementation of the therein outlined human rights strategy in the relevant business processes
- the training of employees in the relevant business areas

Our preventive measures towards direct suppliers aim to develop and implement appropriate procurement strategies and purchasing practices to minimize risk. Specifically, this includes:

- the consideration of the LkSG as a key criterion in supplier selection
- the acceptance of our Code of Conduct by all suppliers or the submission of their own human rights and environmental standards with comparable content
- the contractual assurance by high-risk suppliers to comply with our human rights expectations through the inclusion of specific LkSG clauses in contractual documents
- the completion of an LkSG questionnaire (“Self-Assessment”) by direct suppliers with a high risk for a detailed determination of their risk profile
- the training of risk-based selected suppliers

1.3 Assessment of effectiveness

Deutsche Börse AG reviews the appropriateness and effectiveness of the implemented preventive measures at least once a year and on an ad hoc basis when a significantly changed or increased risk exposure is expected in its own business operations or at a direct supplier. This review also takes into account findings from the handling of notifications and complaints.

1.4 Remedial measures

To respond effectively to an imminent or already occurred breach of a human rights or environmental obligation within our own business operations or those of a direct supplier, we apply appropriate remedial measures. These measures aim to prevent impending violations, end existing violations, or minimize their impact.

For this purpose, we have established various escalation levels, which may extend to the termination of a business relationship in the event of very severe violations. Measures may include sanctions, the cooperation with other companies, or the consideration of contract termination. If measures prove ineffective or the supplier refuses to cooperate, the process is escalated – for example, through contractual penalties or reporting to the central monitoring function.

The cooperation with other companies can help to increase leverage over the supplier; if this is not possible or unsuccessful, the termination of the business relationship is considered. Contract termination is regarded as the last and most severe measure (“ultima ratio”) and is documented and justified, particularly in cases of very serious violations or where no less severe means are available. In doing so, any additional human rights and environmental risks that may arise from terminating such a business relationship are being considered and, where necessary, mitigated through preventive measures. If a supplier is temporarily indispensable for business reasons, the relationship may continue – provided that measures for improvement are

initiated and documented at the same time. In all cases, the decision to continue or terminate the business relationship is carefully assessed and transparently documented.

The effectiveness of these remedial measures is reviewed at least once a year and on an ad hoc basis. This review also takes into account findings from the handling of notifications and complaints.

1.5 Grievance procedure

We have implemented a grievance procedure that enables reporting of human rights and environmental risks as well as breaches of human rights or environmental obligations within our own business operations and those of our suppliers.

In addition to a software-based and telephone whistleblowing system, we have set up a dedicated email address (humanrightsofficer@deutsche-boerse.com) through which such complaints can be submitted directly and confidentially to the Human Rights Officer.

Information on the complaint handling process can be found in the procedural rules [Submission and handling of human rights and environmental-related complaints within Deutsche Börse Group](#). The rules of procedure are published in German and English on the Deutsche Börse Group website.

1.6 Indirect suppliers

The grievance procedure also allows reporting of human rights or environmental risks and breaches of human rights or environmental obligations arising from the economic activities of an indirect supplier. For example, if a breach of a human rights obligation by an indirect supplier becomes known through the grievance procedure, we immediately conduct a risk analysis for this indirect supplier and take appropriate preventive measures. In addition, a remedial action plan is developed, and the policy statement is updated if necessary.

1.7 Documentation and reporting requirements

We document the fulfilment of our due diligence obligations internally. In addition, we inform the public annually on our website about our human rights and environmental risks, our measures and self-commitments, and their effectiveness. The report on the fulfilment of our due diligence obligations in the previous financial year is publicly available.

(2) Priority human rights and environmental risks

Our priorities are derived from the human rights and environmental risks identified on the basis of our risk analysis and are reflected in the expectations we place on ourselves and our suppliers. We define priority risks as those associated with the highest likelihood of occurrence due to the nature of our products and suppliers.

In this sense, we consider discrimination, disregard for adequate occupational safety, and the promotion of child and forced labor to be priority risks.

(3) Our expectations towards suppliers and employees

With the aim of mitigating and reducing human rights and environmental risks in our supply chains, we require suppliers identified as having an elevated risk to contractually commit to adhere to standards of ethical conduct in their dealings with employees, suppliers, customers, and other third parties. Special attention is paid to the priority risks identified in the preceding section at all [our locations](#) that fall within the scope of the LkSG. All of this is in line with our [Human Rights Statement](#), the [Code Conduct for Suppliers](#), our [Code of Business Conduct](#), and our annual [Statement on the UK Modern Slavery Act](#).

We consistently work towards ensuring that there is no form of corruption, discrimination, harassment, forced or child labour within our supply chains. Beyond this, we pay risk-based attention to compliance with local

labour and human rights requirements at the locations of our suppliers.

(4) Amendment provisions

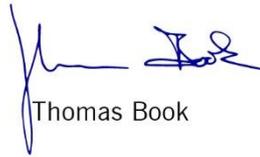
Deutsche Börse AG reviews and updates this statement annually and as needed. This document was approved by the Executive Board of Deutsche Börse AG on December 09, 2025.



Stephan Leithner



Christoph Böhm



Thomas Book



Stephanie Eckermann



Heike Eckert



Christian Kromann



Jens Schulte