

# Code of Conduct for Suppliers of Deutsche Börse Group

Effective as of 12 November 2025

## Preamble

The Deutsche Börse Group (DBG) entities are conscious of their social and environmental responsibility and are committed to the principles of sustainability. This Code of Conduct defines the principles and standards required by DBG's suppliers and their affiliated companies of products and services with regard to their responsibilities towards people and the environment. One of the stated objectives of DBG is to work with its suppliers to implement the principles required by this Code of Conduct on an ongoing basis.

DBG expects that its suppliers actively endeavor to observe the contents of this Code of Conduct. Suppliers are also expected to urge their own suppliers to adhere to this Code of Conduct.

This agreement is made between the supplier and Deutsche Börse AG. The rights contained in this agreement shall also apply in favor of DBG. The supplier agrees to support, and cause its affiliated companies to support, DBG appropriately in the implementation of remedial- and mitigation measures in case human rights or environmental risks or violations within the meaning of the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz), that affect the supplier and/or its affiliated companies (supplier and its affiliated companies hereinafter referred to as the "Supplier"), are identified.

## I. Business conduct

1. DBG aims to establish a relationship with the Supplier based on fairness and partnership and expects the Supplier to observe all applicable legal requirements (including, but not limited to, any tax related legal requirements).
2. DBG expects the Supplier not to accept any kind of corruption and to actively implement and maintain internal anti-corruption measures.

## II. Environmental protection

1. DBG expects the Supplier to strive for the use and continuous improvement of environmentally friendly practices and technologies in its operational processes.
2. DBG expects the Supplier to observe national legal standards and international environmental protection standards, as well as the related performance.
3. DBG expects the Supplier to minimize its environmental burden and continuously improve its environmental protection standards.

## III. Social and ethical responsibility

1. DBG expects the Supplier to pursue a policy of equal opportunities and non-discrimination for its employees, regardless of their skin color, race, nationality, social background, any disability they may have, their sexual orientation, political or religious convictions, gender, or age.
2. DBG expects the Supplier to respect the personal dignity, privacy and personal rights of every individual.
3. DBG expects the Supplier not to employ anyone against their will, force anyone to work, exploit anyone, or accept human trafficking. In addition, DBG expects the Supplier to have internal measures in place to ensure modern slavery is not taking place within its business or supply chain.
4. DBG expects the Supplier not to accept unacceptable treatment of employees, such as emotional abuse, corporal punishment, sexual or personal harassment, or discrimination.
5. DBG expects the Supplier not to accept any sexually inappropriate, intimidating, threatening, abusive, or exploitative behavior (including gestures, language, or physical contact).
6. DBG expects the Supplier to offer appropriate remuneration and to observe the relevant national minimum wage legislation.

7. DBG expects the Supplier to observe the legal provisions regarding maximum working hours applicable in the relevant country.
8. DBG expects the Supplier to recognize its employees' freedom of association and not to discriminate, either in favor of or against, members of employee organizations or trade unions.
9. DBG expects the Supplier not to employ, cause to be employed, or permit the employment of any person who cannot be proven to be at least 15 years old, or 14 years old in countries to which the exception for developing countries provided for in ILO Convention 138 applies, where a minimum age of 14 years may be specified.
10. DBG expects the Supplier to take responsibility for the health and safety of its employees, minimize risks, and ensure that the best possible precautions are taken against accidents and occupational disease.

The parties shall treat the observance of these standards as an integral part of their contractual relationship. Against this background, the parties agree that the respective DBG entity shall be entitled to terminate the contractual relationship for cause with immediate effect in the event of a violation by the Supplier of the provisions contained in section III (Social and ethical responsibility). This applies to all contractual relations with the relevant Supplier. The respective DBG entity shall be entitled to such termination even if the violation of the provisions contained in section III is not directly related to the contractual relationship between the respective DBG entity and the Supplier. This provision shall not be construed to limit any other rights of the respective DBG entity.

This agreement supersedes all prior agreements between the parties hereto with respect to the subject matter hereof. All such prior agreements are hereby terminated and deemed to be of no further force or effect.