

Environmental Protection

Deutsche Börse Group Statement on Environmental Protection

We at Deutsche Börse Group are aware of our responsibility towards the environment and aim to contribute to the Paris Climate Agreement with our business activities. As a globally operating market infrastructure provider, our aim is to protect and uphold environmental stability, prevent climate change and conserve natural resources.

In addition to our compliance with the relevant environmental legislation, Deutsche Börse Group's ambition to protecting the environment is anchored to the Group's corporate culture and values and is reflected in its policies and behaviour against staff, management, suppliers, business partners and other stakeholders.

This Statement provides guidance for all staff, management, suppliers, business partners and stakeholders on our actions and measures we take regarding our environmental performance.

1. Our Priorities in Environmental Protection

Climate Strategy

We take the green transition seriously. Deutsche Börse Group stands for trust and transparency in the markets, which is why we are committed to reduce our own carbon footprint to net–zero by 2045. Therefore, our climate strategy stands at the very centre of our efforts. We have adapted our climate targets in line with current market standards towards a long–term climate strategy. This comprises Science–Based Targets initiative (SBTi) aligned near–term targets by 2030 and a net–zero target by 2045:

Near-term targets

- Scope 1 & 2: Deutsche Börse Group aims to reduce absolute scope 1 and 2 emissions by 42 per cent by 2030 compared to 2022 as the base year.
- Scope 3: Deutsche Börse Group targets to reduce absolute scope 3 emissions from fuel and energy-related activities, business travel and employee commuting by 42 per cent by 2030 compared to 2022 as the base year.
- Scope 3 Supplier Engagement: Deutsche Börse aims to have 87 per cent of its suppliers with science—based targets by 2028, measured by the emissions of purchased goods and services and capital goods.

Net-zero target

Scope 1, 2 & 3: Deutsche Börse Group strives to reduce its absolute Scope 1, 2 and 3 emissions by 90% by 2045, compared to 2022 as the base year.

Our reduction targets are based on the GHG protocol and were validated by the SBTi in May 2024. To achieve our targets, we also developed a climate transition plan in 2024, which contains dedicated emission reduction measures.

ESG Business

Our commitment to environmental protection is not only reflected in our corporate action but also in our business. At the epicenter of the capital markets and its technological infrastructure, we are well positioned to create more sustainable markets, advance sustainable business practices and to serve the corporate and investment communities to achieve their ESG—related

objectives. We actively support to shape the transformation towards a more sustainable world: With our ESG products and services we aim to enable market participants to meet environmental, social and governance (ESG) ambitions and seek to be the trusted partner of choice to our customers within their green transformation. With our ESG solutions we aim to help companies and investors translate purpose into action. In addition to this, we provide information on our websites and foster the dialogue with our stakeholders during conferences, workshops, and similar formats.

While we do not develop our own standards to raise the visibility of such climate—themed products, we support taxonomies, provide platforms or services, and issue climate—themed products that are aligned with best practices and accepted concepts. Furthermore, we leverage established market practices and expect issuers to follow regulatory guidance, most importantly, the Sustainable Finance Disclosure Regulation (SFDR) and EU Taxonomy.

An overview of our ESG product offering can be found in our *GRI index* (p. 11/12).

Policies and Guidelines

To support our environmental efforts and targets, we have implemented relevant policies and procedures that guide our efforts and outline our expectations for suppliers and employees:

- Our Code of Conduct for Suppliers
- Our Code of Business Conduct
- Our Policy statement on the Human Rights
 Strategy of Deutsche Börse AG

3

2. Change Agents

All of our endeavors for environmental protection are supported by four change agents.

2.1 Employees and Management

We foster dialogue and awareness on environmental issues and our climate strategy among our workforce. Therefore, climate topics are integrated into internal communication and foster employee engagement at Deutsche Börse Group. The engagement focuses on the areas:

Office improvements & catering

- ✓ Plants in the vicinity of our offices where possible
- ✓ Old office equipment re–use
- √ Vegan week (Deutsche Börse Group wide)

Mobility

- ✓ Facilitate the cross–location (FFM–Lux) transport
- Free public transportation in Germany ("Deutschlandticket")
- ✓ Free charging stations for electric cars in Germany and Lux
- √ JobRad in Germany
- ✓ Bicycles installations facilities in Luxembourg (secured storage, repair tools)

Events, social activities & awareness

- ✓ Climate Challenge (Deutsche Börse Group)
 & Group plogging
- ✓ Local climate working groups
- ✓ Social Days
- ✓ Sustainability Day
- ✓ Luxembourg Sustainability Forum (sponsorship)
- Migration and enhancement of our Sharepoint, upload of documentaries, trainings, conferences

Trainings

✓ Dedicated trainings on sustainability, in particular climate related topics, for internal stakeholders/target audiences. The trainings are conducted in the form of webinars and workshops (both digital and in–person)

Our senior management supports these initiatives and is closely involved in awareness campaigns for environmental matters. Moreover, we <u>incentivize our management by linking one quarter of the long-term incentive plan to ESG-factors</u>.

2.2 Facility Management and Purchasing

Facility Management takes care of energy-efficient property management and respective reduction measures at our different facilities. They document our energy consumption down to single facilities and identify and implement measures for the different facilities to reduce our emissions.

In addition, Deutsche Börse AG and centrally-serviced Group entities have introduced various measures to analyse, manage and reduce the risk of environmental violations in our supply chains. With this aim, Deutsche Börse AG and centrally-serviced Group entities expect suppliers to observe the ethical standards as prescribed in its Supplier Code of Conduct in their dealings with employees, suppliers, customers and other third parties. All of this is done in accordance with our Code of Conduct for Suppliers, our Code of Business Conduct, and our Policy Statement in accordance with the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz). For assessing the risk of human rights related violations, Deutsche Börse AG and centrally-serviced Group entities have set up a "risk radar" as an internal process in cooperation with an external service provider, which identifies and assesses also such environmental risks which might lead to violations of human rights as prescribed in the German Supply Chain Act. In the event of a potential violation identified through the risk radar, the identified risk case will be evaluated on a case-by-case basis. In addition, an active dialogue with the contracting parties on a regular basis and as required is maintained.

2.3 Risk management and Disclosure

Climate—related factors are consequently reflected in our overall risk management approach und governance. To this end, we follow the recommendations of the Task Force on Climate—related Financial Disclosures (TCFD) and publish a respective <u>TCFD report</u>. This report summarises the information about how we deal with climate risks and opportunities and our science—based targets.

Moreover, Deutsche Börse Group quantifies and reports its Scope 1, 2 and 3 emissions annually. We provide our stakeholders with transparent and detailed information about our environmental performance within our *yearly GRI disclosure*. Our *GRI index*, under Emissions GRI 305, provides a detailed analysis of these figures. For our Scope 3 emissions, we identified the relevant indirect emission sources and calculated a comprehensive Scope 3 inventory, in conformance with the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Based on our value chain and business model, we have identified the relevant Scope 3 categories.

2.4 Stakeholder Engagement

To further calibrate our efforts for environmental protection we continuously identify and assess the expectations and requirements of relevant internal and external stakeholders – such as in our <u>annual materiality analysis</u>.

Moreover, we share our expertise about the evolution of the regulatory framework to make a permanent contribution to strengthening financial markets and achieving society's overarching objectives.

In addition, we create transparency about our sustainability performance by participating in various ESG ratings.

Through our <u>memberships and commitments</u>, we foster exchange by initiating and actively participating in local, national and global initiatives and contribute to our ecosystem and support the green and sustainable transformation. As such, we are committed to and/or member of initiatives and organisations such as the:

- Carbon Disclosure Project (CDP)
- Net Zero Financial Service Providers Alliance (NZFSPA)
- Task Force on Climate—related Financial Disclosures (TCFD)
- Principles for Responsible Investment (PRI)
- Science Based Targets Initiative (SBTi)
- Sustainable Development Goals (SDGs)
- Sustainable Stock Exchanges initiative (SSE)
- UN Global Compact (UNGC)

3. Governance and Updates

We review and update this Statement frequently.

This Statement was reviewed and approved by the Group Sustainability Committee and signed by the Chief Sustainability Officer on 26 July 2024.

Oliver Engels

O.las