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Corporate Engagement Guideline

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Notes: This written rule uses gender-neutral and inclusive language. Whenever possible, the generic masculine is avoided and all employees of any gender identity (m/f/d) are addressed.

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1. Purpose, Objectives and Basis

1.1. Purpose and Objectives

The Corporate Engagement Guideline shall provide guidance on corporate responsibility & citizenship activities at Deutsche Börse Group (Deutsche Börse AG and any of its entities, hereinafter “Group”). It lays down binding requirements for all corporate engagement-related activities.

It creates an effective approval process and first level control environment, ensuring a cohesive, aligned and effective Group-wide corporate responsibility and citizenship framework, and preventing any damage to the Group’s reputation, violation of established compliance rules or ineffective use of shareholder money.

Our corporate engagement follows two principles – that of effectiveness, and that of bringing in our strengths – and focuses on three main areas: education, culture and social cohesion. It is implemented with the help of four instruments: non-business-related sponsoring, donations, personal commitment (including staff fundraisers), and memberships.

This guideline applies to all employees and executives who are involved in the planning and execution of any corporate engagement activity as described in this guideline.

Any corporate engagement activity is a statement by the company that can shape both the public and internal perception of the Group, which is critical to the confidence of customers, shareholders and staff in the Group. Thus, the responsibility and final approval for all corporate engagement activities lies with Group Communications & Marketing.

This guideline is in the responsibility of CEO (Div)/ Group Communications & Marketing (A) Corporate Engagement (U) and will be published as well as developed further by this unit.

1.2. Basis of this Written Rule

Considering the definitions of the Written Rule Framework Guideline (chapter 3 – Definitions and Requirements), this written rule is a “Guideline” because the three categories (External Requirements, High Risk Activities, Strategy of DBAG) for a “Policy” do not apply.

2. Functional Scope and Target Groups

2.1. Functional Scope of applicability

Entity	▪ DBAG and/or adopting LE within the Group
Area	▪ All areas

Table 1: Scope

2.2. Target groups

Target group	Key message
All employees and executives who are involved in the planning and execution of any corporate engagement activity as described hereinafter	... know the requirements of this guideline and apply them.
All employees	... know the core principles of this guideline.

Table 2: Target groups

3. Definitions

3.1 Non-business-related sponsoring

Non-business-related sponsoring means systematically supporting organizations or events in the areas of our engagement through cash and non-cash benefits as well as services with the aim of fulfilling philanthropic or charitable as well as communication and marketing objectives.

3.2 Donations

Donations include cash and non-cash benefits for charitable purposes and for projects in our areas of engagement.

3.3 Personal commitment

Personal commitment describes the personal and voluntary involvement of our employees, often with the company's backing, to charitable organizations and projects in our three areas of engagement. We want to motivate our staff to assume their responsibility towards society and support local corporate citizenship initiatives at the Group's locations.

3.4 Memberships

Membership refers to the state of being a member or part of a group, organization, or community. It often involves certain rights, privileges, and responsibilities that come with being part of that entity. Memberships in the context of corporate engagement are formal, requiring an application or fee.

A membership may include financial contributions, the participation of employees in events or any other involvements.

The Group supports various initiatives and institutions in the form of memberships.

4. Requirements

4.1. Areas of engagement

Our involvement focuses on three main areas: education, culture and social cohesion. Corporate engagement activities fit into at least one of the three areas of engagement and are implemented with one of the four instruments which are defined in chapter 3 of this guideline.

Education

In the area of education, our engagement activities must be in line with the following guiding principle: creating a future-ready society through economic and financial education and digital literacy. Activities need to promote basic economic education for children and young people, capital market knowledge for students and private investors, or support universities and professorships with a focus on financial and capital markets. Equally favored are activities which enhance digital literacy and foster future-oriented skills such as coding or programming.

Culture

In the area of culture, our engagement activities must be in line with the following guiding principle: contributing to a cultural legacy. Activities must offer a direct benefit to exceptional projects and institutions within the realm of fine arts (painting, sculpture, architecture, music, theatre, dance, and poetry). A special focus lies on contemporary photography via the Deutsche Börse Photography Foundation.

Social cohesion

In the area of social cohesion, our engagement activities must be in line with the following guiding principle: promoting innovative and scalable approaches that foster social cohesion. Activities need to address challenges such as demographic change, migration, economic inequality and insecurity, distrust and misinformation, and foster a culture of belonging and mutual respect. Preference is given to projects that help young people develop into valuable pillars of future society and that enable colleagues to volunteer.

4.2. Instruments of engagement

Our engagement is implemented with the help of four instruments: non-business-related sponsoring, donations, personal commitment, and memberships, which are defined in chapter 3.

Non-business-related sponsoring

Non-business-related sponsoring addresses specific target groups and is based on a mutual agreement in which the services provided by both parties are clearly defined in advance and are specified in a sponsoring contract, approved by Legal, Compliance, and Tax. Non-business-related sponsoring is particularly effective when it is geared to the medium or long term and incorporated in the Group's overall corporate communication.

- The project must be in line with at least one of the three areas of engagement.
- A Group company should be title or main sponsor.
- The number of additional sponsors must be as small as possible.
- If other sponsors are involved, their image should fit in with the Group's. Projects in which a direct competitor would be a co-sponsor should be avoided.
- The project must offer a direct benefit to the employees of the Group.
- The Group sponsors institutions or events, not individuals.
- No conflict of interest arises from the non-business-related sponsoring.

Donations made by the Group

- The project must be in line with at least one of our three areas of engagement.
- The project must be non-profitable.
- We only support projects that are carried out together with established and well-known or recognized social institutions which use the funds for a specific charity project (e.g. on a local level).
- We do not provide direct financial support of i) political parties or candidates, or ii) religious organizations, regardless of country.
- No conflict of interest arises from the donations.
- Single donations or combined donations of €100,000 p.a. or more must be reported to the Group Money Laundering Officer in advance.
- Single donations or combined donations p.a. of €250,000 p.a. or more must be formally approved in advance by the Executive Board of the relevant company.

Disaster relief

The Group is committed to corporate engagement beyond the outlined customary standards to provide impactful natural disaster response and support humanitarian action. In case of a natural or humanitarian disaster that occurs a) in the vicinity of one of the Group's locations or b) has an impact on a significant number of staff, Group Communications & Marketing will request funds from the Executive Board of Deutsche Börse AG to be donated to relief organizations that are in line with the Corporate Engagement Guideline and other relevant policies.

Privately organized fundraisers

Privately organized fundraisers by the Group's staff are supported by this guideline. However, in order to protect the integrity of Group entities as strictly regulated companies at all times, privately organized charitable activities, especially those involving a call for funds or gift giving, must be clearly recognizable as such. It must be clear and unambiguous that such privately organized fundraisers do not imply a corporate endorsement, that at no time, the Group is connected to the beneficiary, nor that it has been involved in selecting the beneficiary receiving the donations. Corporate imagery or entity names must not be used to depict or describe this type of charitable activity. Such activities must be brought to the knowledge of the Head of Corporate Engagement.

Personal commitment

- The project must be in line with at least one of our three areas of engagement.
- Group Communications & Marketing, together with the local representatives, coordinates the selection of formats and organizations in which employees can get involved. Employees can suggest additional projects and organizations.
- Each year, the Group gives employees paid time off for up to three working days for voluntary activities. In addition to these voluntary-work days, employees are also given paid time off to participate in the Social Days organized by the Group.
- Employees are released for selected projects after consultation with HR and their line manager.
- If commitment during working hours is required, the project must not exceed one day.
- No conflict of interest arises from personal commitment.

Memberships

Any membership should ideally be relevant for the entire Group, but at least for the respective business area which enters into a membership. Terms and conditions of the membership are clearly defined in advance as well as approved by Legal and Compliance.

- The membership must be in line with at least one of our three areas of engagement.
- Memberships can be geared to the long term, but the contracts must be terminable on an annual basis.
- No conflict of interest arises from the membership.

4.3. Approval requirements

4.3.1. Process

To contribute to an effective first level control environment and efficient review process, the owner of the planned activity must check if the criteria outlined in this written rule are met and obtain preliminary approval of their line manager to proceed before any project is submitted for review. The owner must also thoroughly consult the Code of Business Conduct, the Group's Anti-Corruption Policy and Policy on Conflicts of Interest.

All corporate engagement activities as described in this written rule must be reported to Corporate Engagement at least 14 working days before the final decision on the activity is taken via the form "Non-Business-Related Sponsoring/Donation" in the [Employee Compliance Portal](#) (ECP) under the section "Conflict of Interest".

Initiatives involving political stakeholders are managed by Group Regulatory Strategy.

The team of Corporate Engagement has up to 14 days to report back to the owner of the planned activity any concerns about the activity and to pause or prevent the execution of the activity if the criteria described in this written rule are not sufficiently met.

Within these 14 working days, the team of Corporate Engagement may also consult with Group Compliance and Group Legal in case of any doubt that the planned activity may not be compliant with the aforementioned written rules. If the team of Corporate Engagement decides to consult with Group Compliance and Group Legal, the owner of the planned activity will be informed and asked to wait for the result of the review by Group Compliance and Group Legal before proceeding with the planning or execution of the activity.

4.3.2. Approval criteria

- 1) The project follows the principles of our commitment (score 5-7)
- 2) The project is in line with at least one of the three areas of our engagement.
- 3) The project uses the instruments of our engagement and how they are applied.
- 4) The project is compliant with our Anti-Corruption Policy.
- 5) The project is compliant with our Policy on Conflicts of Interest.
- 6) The project is compliant with our Code of Business Conduct.

Projects can be approved if they have a minimum score of 5 (see score card, chapter 4.3.3. and criteria 2), 3), 4), 5) and 6) are met without exception.

4.3.3. Score card

	The project ...	
Effectiveness	▪ has long-term effects. ▪ is scalable and can be rolled out in other locations. ▪ includes a procedure to measure the effectiveness at the target groups.	Yes/No Yes/No Yes/No
Bringing in our strengths	▪ relates to core competencies or core topics of the Group. ▪ allows employees to become personally involved and participate directly. ▪ has a direct connection to one of our locations or develops its effects in the vicinity of the location. ▪ positions the Group as good corporate citizen.	Yes/No Yes/No Yes/No Yes/No

		Total score ¹ :
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5. Roles and Responsibilities

5.1 Requestor

All employees of the Group who are in the scope of applicability as defined under 2.1 must send their proposals for corporate engagement activities via the corresponding form in the [Employee Compliance Portal](#) (ECP). Requestors must check this guideline and make sure that their proposed activities meet the requirements before submitting their requests.

5.2 Owner of this Guideline

This guideline is in the responsibility of CEO (Div), Group Communications & Marketing (A), Corporate Engagement (U) and will be published as well as further developed.

6. Appendix

6.1. Contact Information

Written Rule Owner: Head of Corporate Engagement (U)

Please contact Corporate Engagement (U) via e-mail at corporate.engagement@deutsche-boerse.com in case of any questions related to this guideline.

6.2. Document History

Document History

Version	Date	Changes & Background
1.0	01.01.2025	Transformation of the former Corporate Engagement Policy version 1.5 of January 2024 to a guideline according to the Written Rule Framework Guideline
1.1	15.10.2025	Minor changes: 1. Split of areas of engagement “education and culture” into two areas, focus remains the same. 2. Introduction of Sponsoring/Donation Form to request donations. Yearly review for 2025 concluded.
1.2	20.08.2026	Yearly Review conducted

Coordination before publication

Version	Date	Task	Function
1.1	15.10.2025	Creator	Content Desk Corporate Functions,

¹ The total score is the sum of the criteria for “Effectiveness” and “Bringing in our strengths” which are met and therefore answered with “Yes”. “Yes” = 1, “No” = 0

			Channels & Engagement
	15.10.2025	Content Review	Head of Content Desk Corporate Functions, Channels & Engagement
	15.10.2025	Content Confirmation	Head of Content Desk Corporate Functions, Channels & Engagement (U)
1.2	20.08.2026	Content Review and Content Confirmation	Head of Corporate Engagement (U)

Approvals

Version	Date	Task	
1.0	20.12.2024	Approval	Head of Group Communications & Marketing (A)
1.0	29.01.2025	Approval	CEO (DBAG)
1.1	15.10.2025	Approval	Head of Content Desk Corporate Functions, Channels & Engagement (U)
1.2	20.08.2026	Approval	Head of Corporate Engagement (U)

6.3. Related Written Rules

Superordinated Written Rules	n/a
Subordinated Written Rules	n/a

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