

Report by Deutsche Börse AG on the Supply Chain Due Dili- gence Act (LkSG)

(Reporting period from 01.01.2024 to 31.12.2024)

A. Strategy & Anchoring

A1. Monitoring risk management & management responsibility

What responsibilities for monitoring risk management were defined in the reporting period?

Marc Peter Klein, Group Chief Compliance Officer of Deutsche Börse AG, was appointed as the Human Rights Officer by the Executive Board in December 2023. This follows the legislator's suggestion according to § 4 paragraph 3 sentence 1 LkSG to establish internal company responsibility for monitoring risk management by appointing a Human Rights Officer. Prior to his appointment as Human Rights Officer, Marc Peter Klein had already performed the duties of the Human Rights Officer in his role as Group Chief Compliance Officer. The Human Rights Officer is supported in monitoring risk management under the LkSG by the so-called "Central Monitoring Function" (CMF). This was mandated by the Executive Board of Deutsche Börse AG to monitor the adequacy and effectiveness of risk management in compliance with due diligence obligations according to § 3 paragraph 1 LkSG. The CMF is located in the Compliance area of Deutsche Börse AG and thus with the Human Rights Officer, and is led by Marija Kozica (Vice President, Head of Law and Regulation). Marija Kozica carries out the activities associated with monitoring risk management with her employees and is in regular exchange with the Human Rights Officer, Marc Peter Klein. The Executive Board of Deutsche Börse AG is informed about the work of the CMF and the Human Rights Officer at least annually (§ 4 paragraph 3 sentence 2 LkSG) in the form of a report and on an ad hoc basis.

Has the management established a reporting process that ensures that it is regularly informed - at least once a year - about the work of the person responsible for overseeing risk management?

Deutsche Börse AG confirms that the management has established a reporting process that, in accordance with section 4 paragraph 3 LkSG, ensures that it is regularly informed - at least once a year - about the work of the person responsible for monitoring risk management (namely the Human Rights Officer).

Describe the process that ensures reporting to management at least once a year or regularly with regard to risk management.

The Human Rights Officer reports regularly, at least annually and on an ad hoc basis, on his activities regarding the monitoring of LkSG-related risk management to the Executive Board members of Deutsche Börse AG responsible for the implementation and compliance with the LkSG. The annual reporting takes place within the framework of a dedicated LkSG Risk Management Report, which is prepared by the CMF in coordination with the Human Rights Officer. This report particularly highlights the implementation of due diligence obligations, audit actions to assess

these, the identified potential LkSG-related risks, and the mitigating measures taken in this context. The Executive Board members can address their LkSG-related questions or comments on the LkSG Risk Management Report, such as suggestions for improving existing processes, to the Human Rights Officer at any time. The internal report is also sent to the Group Sustainability Committee of Deutsche Börse Group and presented during a meeting. Additionally, the CMF reports certain key figures (e.g., receipt of complaints, status of escalation processes, current key figures on direct suppliers) and other relevant information to the Human Rights Officer on a quarterly basis. The Human Rights Officer is also involved in escalation processes and decisions by the CMF on an ad hoc basis, if necessary.

A2. Policy statement on human rights strategy

Is there a policy statement that was created or updated based on the risk analysis carried out during the reporting period?

Please upload the current version of the policy statement that your management has made and provide the link where the statement can be accessed.

Deutsche Börse AG makes its policy statement, which has been updated to take into account the risk analyses carried out in the 2024 reporting period, available on its website in German and English.

The policy statement can be accessed via the following links:

Version in German:

https://www.deutsche-boerse.com/resource/blob/2724738/5699fb6f2e5f488d213600dbbc6d4b0c/data/dbg-menschenrechtserkl%C3%A4rung_de.pdf

Version in English:

https://www.deutsche-boerse.com/resource/blob/3800562/9f347e74f9934e23edda9ecb28c85bc7/data/dbg-menschenrechtserklaerung_en.pdf

Has the policy statement for the reporting period been communicated?

Deutsche Börse AG confirms that the Policy statement on the Human Rights Strategy of Deutsche Börse AG has been communicated to employees, the works council, the public and direct suppliers for whom a risk was identified as part of the risk analysis.

Please describe how the policy statement was communicated to the relevant target groups was communicated.

Deutsche Börse AG communicates its policy statement to its employees, works council, the public, and its direct suppliers. The policy statement on Deutsche Börse AG's human rights strategy is made accessible online in the "Intranet Deutsche Börse Group" for employees of Deutsche Börse AG and those group companies with corresponding access to the intranet. The Group ESG Strategy

team of Deutsche Börse AG, which is responsible for the development and management of the ESG strategy of the Deutsche Börse Group, publishes the policy statement in German and English on its dedicated intranet webpage.

The communication of updates to the policy statement is carried out by Group ESG Strategy via email to the members of the works council. Deutsche Börse AG publishes its policy statement on its website in German and English, making it accessible to the public in this manner (<https://www.deutscheboerse.com/dbg-en/responsibility/sustainability/our-social-environment/human-rights>; <https://www.deutsche-boerse.com/dbg-en/responsibility/sustainability/policies-guidelines>). The direct suppliers of Deutsche Börse AG receive access to the policy statement as part of the "onboarding" process.

What elements does the policy statement contain?

Description of the procedure by which the company complies with the following obligations:

- Establishment of risk management
- Annual risk analysis
- Implementation of preventive measures in the company's own business area, with direct suppliers and, if applicable, indirect suppliers, and their effectiveness review
- Corrective measures in the company's own business area, with direct suppliers and, if applicable, indirect suppliers, and their effectiveness review
- Provision of a complaint procedure in the company's own business area, with suppliers, and their effectiveness review
- Documentation and reporting obligations
- Description of identified priority risks
- Description of human rights-related and environmental-related expectations of our own employees and suppliers

Further elements: Deutsche Börse AG's commitment to respect and protect human rights along its supply chains; Monitoring of LkSG-related risk management (Assessment of the appropriateness and effectiveness of the implemented due diligence obligations)

Description of possible updates in the reporting period and the reasons for them.

If an update has been made, please indicate how the policy statement was updated during the reporting period and explain why.

The policy statement is updated once a year. The reason for the update is the procedurally anchored annual review of the correctness of the policy declaration, which was accompanied by non-material adjustments (e.g. Reformulations, Specifications).

A3. Anchoring the human rights strategy within your own organization

In which relevant departments/business processes was the anchoring of the human rights strategy ensured during the reporting period?

- Human resources/HR
- Occupational safety & occupational health management

- Communication / Corporate Affairs
- Purchasing/Procurement
- Supplier management
- CSR/Sustainability
- Legal/Compliance
- Audit

Describe how the responsibility for the implementation of the strategy is distributed within the departments/business processes.

The implementation of the strategy primarily lies with the Executive Board of Deutsche Börse AG. The Board has decided to implement the due diligence obligations of the LkSG and the associated requirements within the framework of the already established three lines of defense model at Deutsche Börse AG.

The Purchasing department of Deutsche Börse AG forms the first line of defense for LkSG risk management. The Supplier Governance & Control team located in this department is particularly responsible for the establishment and legally compliant execution of appropriate and effective risk analysis according to § 5 LkSG, as well as the implementation of risk-based preventive measures in the sense of § 6 paragraph 4 LkSG with direct suppliers. Additionally, the Supplier Governance & Control team is responsible for implementing preventive measures within Deutsche Börse AG's own business area. These include, among other things, the development and implementation of appropriate procurement strategies and purchasing practices to prevent or minimize identified or potential LkSG-relevant risks, as well as conducting training for employees in relevant business areas and carrying out risk-based control measures.

The management of the Purchasing department reports directly to the Executive Board member responsible for their area.

The Group ESG Strategy team is also part of the first line of defense and is responsible for the creation, content coordination, and publication of the policy statement according to § 6 paragraph 2 LkSG.

Rules related to human rights, which must be observed by all employees of Deutsche Börse Group, are set by various departments within Deutsche Börse AG, including Group Human Relations (HR department) and Group Compliance. Additionally, Group Human Relations is responsible for the annual and ad hoc determination of employee numbers in the group companies of Deutsche Börse Group, which is necessary for identifying the personal scope of application of the LkSG within the group.

The complaint procedure according to § 8 LkSG is also anchored at the first line of defense level. This is managed by selected employees of the Law & Regulation team within the Group Compliance department of Deutsche Börse AG.

The Law & Regulation team, where the CMF is located, forms the second line of defense for LkSG-related risks together with the Human Rights Officer, considering potential conflicts of interest.

The CMF is responsible for monitoring risk management to ensure compliance with due diligence obligations according to § 4 LkSG. The adequacy and effectiveness of the implementation and execution of due diligence obligations according to § 3 paragraph 1 LkSG are reviewed at least once a year based on a dedicated LkSG control plan, and corresponding deficiencies are addressed in the specialist departments. Additionally, the CMF monitors the first line of defense on an ad hoc basis.

Group Internal Audit is the audit department of Deutsche Börse AG and represents the third line of defense. It is responsible for monitoring the LkSG-related activities of the first and second lines of defense based on risk-based planning.

Describe how the strategy is integrated into operational processes and procedures.

The Deutsche Börse AG has implemented the due diligence obligations according to § 3 paragraph 1 LkSG within the framework of a dedicated project to implement new processes and adapt existing processes, thereby integrating the human rights strategy into operational business processes.

The human rights strategy laid down in the fundamental declaration is integrated into the own business area of Deutsche Börse AG. The direct suppliers of Deutsche Börse AG and the companies of the Deutsche Börse Group, which fall within the own business area of Deutsche Börse AG, are obliged, based on the results of the risk analysis, to observe the human rights strategy of Deutsche Börse AG and to pass it on accordingly in their own supply chains.

Describe the resources and expertise provided for implementation.

The initial implementation of the due diligence obligations pursuant to section 3 paragraph 1 LkSG was carried out with existing resources of Deutsche Börse AG with the involvement of all departments affected by the LkSG. In addition, Deutsche Börse AG was supported externally by KPMG (auditing and consulting firm) in the implementation of the risk analysis in accordance with section 5 LkSG.

Deutsche Börse AG has created two dedicated additional full-time positions in Purchasing and a new full-time position for the monitoring of due diligence obligations in Group Compliance, which were filled in the reporting period.

B. Risk analysis and Preventative measures

B1. Implementation, procedure, and results of the risk analysis

Was a regular (annual) risk analysis carried out during the reporting period to identify, weight and prioritize human rights and environmental risks?

Yes, for Deutsche Börse AG's own business area as well as for direct suppliers.

Describe the period during which the annual risk analysis was carried out.

The risk analysis in accordance with section 5 paragraph 1 to 3 LkSG was carried out for the period from January 1st to December 31st, 2024.

Describe the risk analysis process.

The risk analysis to identify human rights and environmental risks in the own business area as well as with direct suppliers is carried out by the Purchasing department. The risk analysis according to LkSG is conducted twice a year. The results of the risk analysis serve as the basis for preventive measures and are immediately communicated to the CMF upon availability.

Immediate suppliers

The risk analysis for direct suppliers of Deutsche Börse AG and the companies within its own business area is carried out in two steps: the initial "risk mapping" to determine the gross risk and the net risk analysis (Supplier Self-Assessment). First, relevant company data (companies that fall within the own business area, as well as their direct suppliers) are collected for the gross risk analysis. With the help of an external service provider (EcoVadis), all companies falling within the own business area of Deutsche Börse AG and all direct suppliers are analyzed and weighted and prioritized regarding their human rights and environmental risks. The weighting and prioritization of relevant risks are reflected in a risk scoring determined by EcoVadis in risk categories (very low, low, medium, medium-high, high, and very high risk). The country and industry risk are included in these categories. The external service provider determines an industry risk through an analysis of a total of 227 industries based on 16 criteria from the areas of labor and human rights. For these areas, criteria such as employee health and safety and child labor are used. The use of raw materials and chemical products, including waste, is considered in the environmental area. These criteria are evaluated based on a range of public, private, and non-profit sources (e.g., WWF, Fair Labor Association, European Commission).

To measure the country risk of a supplier, various indices, such as the Global Slavery Index Voice and Accountability (Walk Free) or the Environmental Performance Index (Yale and Columbia), are weighted and added to a total score for each area.

Using the risk-based approach and after determining the LkSG relevance of the supplier, the next step is the net risk analysis. In this context, direct suppliers in the "high" and "very high" risk categories are invited to a "Supplier Self-Assessment." By providing further information about their human rights and environmental efforts, direct suppliers can influence their initially determined risk score and consequently their risk categorization, thereby reducing or increasing the risk identified based on publicly available information.

In the event that direct suppliers cannot participate in the self-assessment or refuse to participate, Deutsche Börse AG has established appropriate escalation procedures. The CMF and the human rights officer are accordingly informed and involved in relevant processes for further action in such cases.

Own business area of Deutsche Börse AG

Even before the announcement of the LkSG, Deutsche Börse AG had taken numerous measures within its own organization and for the Deutsche Börse Group to mitigate and avoid human rights-

related risks. Various measures, such as the Business Code of Conduct and the Anti-Harassment/Disciplinary Action Policy, have been implemented, which must be observed by all employees of the Deutsche Börse Group. During the selection process for new employees, it is ensured that certain human rights violations (e.g., child labor) are avoided. To enforce internal guidelines, measures are regularly and as needed taken by Group Compliance and Group Human Relations.

To minimize potential LkSG-relevant risks, Deutsche Börse AG and the companies within its own business area are considered in the risk analysis located in the Purchasing department and evaluated regarding their risks by the external service provider EcoVadis.

Were event-related risk analyzes also carried out during the reporting period?

No.

Justify your answer.

No human rights and environmental risks were identified as part of the Negative News Screening. Furthermore, the risk situation in the supply chain for Deutsche Börse AG has not changed or expanded significantly.

In the reporting period, no findings emerged from the processing of information pursuant to § 8 (1) LkSG that would have had to be considered.

Results of risk determination

Which risks were identified as part of the risk analysis in your own business area?

None.

Results of risk determination

Which risks were identified as part of the risk analysis(s) for direct suppliers?

Disregard for occupational safety and work-related health hazards.

Were the risks identified during the reporting period weighted and, if necessary, prioritized and, if so, based on what appropriateness criteria?

Yes, based on the expected severity of the injury by degree, number of people affected and irreversibility.

Describe in more detail how the grade of importance and, if necessary, prioritization was carried out and what considerations were made.

The risk assessment (risk score) for direct suppliers is calculated within the framework of the gross risk analysis based on the risk disposition of the supplier's industry and country, focusing on the key topics of environment, labor, and human rights. The country risk includes all locations of the business unit, with an industry focus set for each business unit. Based on this, a materiality analysis with an intensity factor (the intensity factor serves to weight the industry within the risk areas considered by EcoVadis (environment, human rights, etc.)) is carried out based on the experience of the external service provider using the ISIC classification of the United Nations (UN). Thus, a risk level (score) comparable to the school grading principle is determined for each direct supplier: 1- very low risk / 2- low risk / 3- medium low risk / 4- medium high risk / 5- high risk / 6- very high risk. Suppliers with a "high" and "very high" risk assessment (high-risk suppliers) are

prioritized. If a high-risk supplier is classified as "LkSG-relevant," i.e., the goods or services provided by this supplier are deemed necessary for the provision of the (own) services of Deutsche Börse AG and the companies within its own business area, the supplier is considered in the next step within the framework of the net risk analysis. In the net risk analysis, high-risk suppliers classified as "LkSG-relevant" must additionally submit the "Supplier Self-Assessment" described in the risk analysis procedure to enable a more detailed risk assessment.

B2. Preventative measures in your own business area

Which risks were prioritized in your own business area during the reporting period?

None.

If no risks were selected, please justify your answer.

In the own business area of Deutsche Börse AG, which also includes other companies of the Deutsche Börse Group, no LkSG-relevant risks were identified. As already stated under B1, Deutsche Börse AG had successfully implemented comprehensive measures to minimize and avoid human rights violations in its own business area even before the LkSG came into force. Furthermore, the environmental risks defined in § 2 paragraph 3 LkSG can be excluded in the case of the Deutsche Börse Group and its business model in its own business area.

The violation of a duty resulting from the LkSG that occurred in 2024 does not lead to an increased risk in the own business area of Deutsche Börse AG, as a (human rights) risk within the meaning of the LkSG presupposes that a violation is likely to occur based on actual circumstances. The single violation in the area of occupational safety did not lead to any changed circumstances from which an imminent violation could be assumed with sufficient probability.

What preventative measures were implemented for the reporting period to prevent and minimize the priority risks in your own business area?

- Implementation of training courses in relevant business areas
- Implementation of risk-based control measures
- Other/further measures:
 - Strengthening of occupational safety measures,
 - Code of Business Conduct,
 - Implementation of the Declaration of Principles on Deutsche Börse AG's Human Rights Strategy in relevant business areas,
 - Development and implementation of appropriate sourcing strategies and purchasing practices that can avoid or mitigate risks.

Conducting training in relevant business areas

Describe the measures implemented and specify the scope (e.g., number, coverage/area of application).

Employees in the relevant business areas, especially those directly related to the implementation of the due diligence obligations of the LkSG, were trained by the "Purchasing" department and made aware of the relevance and requirements of the LkSG. "Purchasing" also considers potential changes in responsibilities and new business areas in its training concept.

The training material is available to all employees centrally on Deutsche Börse Group intranet and is regularly updated by the "Purchasing" department and sent to the responsible people.

Describe how training is appropriate and effective in preventing and minimizing the priority risks.

The appropriateness and effectiveness regarding the training of relevant employees at Deutsche Börse AG as well as responsible persons in the companies belonging to Deutsche Börse AG (own business area) on LkSG-relevant processes and procedures was assessed as part of the annual controls by the central monitoring body based on Samples checked. The training materials are suitable and appropriate. No weaknesses were identified during the review period as part of the adequacy and effectiveness review of the training courses to prevent and minimize LkSG-related risks.

Implementation of risk-based control measures

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/scope).

The CMF defines controls to ensure at least annual and event-driven reviews of due diligence obligations. These controls are reviewed by the CMF at least annually regarding their design and completeness and adjusted to changed circumstances if necessary. Further details regarding the implementation of control measures are outlined in the chapter "Review of Risk Management."

Describe the extent to which the measures to prevent and minimize the priority risks are appropriate and effective.

The appropriateness and effectiveness of the measures is checked by the CMF at least annually and on a case-by-case basis. If vulnerabilities are identified, they are addressed and implemented within a reasonable period of time. Appropriate escalation processes are provided for non-compliance with measures.

Other/further measures

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/scope).

The Deutsche Börse Group obliges its employees to comply with the Business Code of Conduct, which addresses the protection and preservation of human rights among numerous principles. This Code of Conduct applies to all employees employed by Deutsche Börse AG or any of the companies belonging to the Deutsche Börse Group. The Business Code of Conduct is part of the employment contract, and employees acknowledge it upon hiring. The Deutsche Börse Group aims to lead by example in protecting and preserving human rights through a holistic approach to corporate responsibility and its disclosure. This includes respecting human rights both along the supply chain and within the Deutsche Börse Group. The Business Code of Conduct clearly states that the Deutsche Börse Group supports conventions aimed at eliminating forced labor and child labor and promoting freedom of association and equality. The Deutsche Börse Group recognizes that modern slavery violates fundamental human rights. The commitment to protecting human rights is embedded in the corporate culture and values of the Deutsche Börse Group and is reflected in its policies and behavior towards employees, business partners, customers, and the communities and countries in which it operates.

As a preventive measure in its own business area and towards direct suppliers, § 6 paragraph 2 LkSG provides for the implementation of the fundamental declaration on the human rights strategy in relevant business areas. How the fundamental declaration was implemented in the own business area of Deutsche Börse AG is described in Chapter A.3 of this report. The Purchasing department has developed and implemented appropriate procurement strategies and purchasing practices to avoid or mitigate identified LkSG-related risks in its own business area. The adjusted strategies and principles have been communicated to relevant employees.

Describe the extent to which the measures taken to prevent and minimise the priority risks are appropriate and effective.

The measures to prevent and minimize LkSG-related (priority) risks were developed and implemented considering the requirements of the LkSG. These measures take into account the (potential) risks identified in the risk analysis as well as the general business field of Deutsche Börse AG and the companies that fall within the own business area of Deutsche Börse AG. Clear responsibilities for the implementation of the various measures within the own business area of Deutsche Börse AG have been assigned, and relevant employees are informed about these and trained regarding their responsibility for compliance.

B3. Preventative measures for direct suppliers

Which risks were prioritized by direct suppliers for the reporting period?

Human right risks

Disregard for occupational safety and work-related health hazards.

What specific risk is involved?

Deutsche Börse AG has identified direct suppliers for whom it cannot be ruled out that the occupational health and safety regulations applicable at the place of employment are not complied with due to a lack of information and thus there is a potential risk of work-related health hazards pursuant to Section 2 (2) No. 5 (c) LkSG.

Where does the risk occur?

In the United States (USA), Slovakia, Israel and Singapore.

What preventative measures were implemented for the reporting period to prevent and minimize priority risks among direct suppliers?

- Development and implementation of appropriate procurement strategies and purchasing practices
- Obtain contractual assurance for compliance and implementation of expectations the supply chain
- Training and education to enforce contractual assurances
- Agreement and implementation of risk-based control measures

Category: Procurement Strategy & Purchasing Practices

Development and implementation of appropriate procurement strategies and purchasing practices

Describe the measures implemented and the extent to which the determination of delivery times, purchase prices or the duration of contractual relationships.

LkSG-relevant aspects are taken into account when planning the selection of potential suppliers, onboarding, concluding contracts and the business relationship.

Describe how adjustments in your own procurement strategy and the purchasing practices should contribute to the prevention and minimisation of priority risks.

When selecting potential suppliers, during onboarding, contract conclusion, and throughout the business relationship with suppliers, the risks and requirements addressed by the LkSG are considered. By developing and implementing appropriate procurement strategies and purchasing practices, obtaining contractual assurances for compliance and implementation of expectations along the supply chain, providing training and education to enforce contractual assurances, and agreeing on and conducting risk-based control measures, LkSG-relevant risks can be minimized even before starting business with suppliers.

In the event of an increased risk identified during onboarding, additional preventive measures can be introduced, or the business initiation can be terminated. Furthermore, existing suppliers with a "high" and "very high" risk assessment are contractually obligated to meet the requirements of the LkSG and, for example, implement preventive and remedial measures. Ultimately, the implemented measures are monitored through control measures.

Other categories

- Obtaining contractual assurances for compliance with and implementation of expectations along the supply chain
- Training and further education to enforce contractual assurance
- Agreement and implementation of risk-based control measures

Describe the extent to which the measures to prevent and minimize the priority Risks are appropriate and effective.

For direct suppliers of Deutsche Börse AG and the companies within its own business area, where a high or very high risk was identified in the risk analysis according to § 5 LkSG (§ 6 paragraph 1 LkSG), the following preventive measures were established in compliance with § 6 paragraph 4 LkSG.

(1) Integration of expectations into supplier selection

Deutsche Börse AG has adjusted its purchasing practices and procurement strategies to appropriately consider LkSG-relevant aspects when selecting (potential) suppliers. The selection of suppliers is carried out centrally with the involvement of the Purchasing department. Suppliers undergo a comprehensive background check, in which potential human rights and environmental risks are assessed.

(2) Obtaining contractual assurances for compliance and implementation of expectations along the supply chain, (3) Training and education to enforce contractual assurances, and (4) Agreement and implementation of risk-based control measures

Deutsche Börse AG requires its direct suppliers to comply with the human rights and environmental expectations demanded by management and to appropriately address these along the supply chain. For this purpose, a dedicated annex to their framework contracts has been created, which applies to direct suppliers (within the meaning of § 2 paragraph 7 LkSG) in the "high" and "very high" risk categories. In this annex, Deutsche Börse AG obtains the following assurances from the affected direct suppliers:

- Fulfillment of the duty to cooperate in conducting the risk analysis, prevention, and remediation according to the LkSG
- Compliance with the "Fundamental Declaration on the Human Rights Strategy according to the LkSG" (hereinafter "Fundamental Declaration")
- Conducting training and education for their own employees regarding the obligations arising from the Fundamental Declaration
- Passing on compliance with the human rights expectations contained in the Fundamental Declaration along their supply chain and verifying compliance
- (Immediate) obligation to inform in the event of a possible violation of the Fundamental Declaration by the supplier
- Duty to cooperate in the immediate development of a joint concept to end and minimize the violation and in taking appropriate remedial measures

Deutsche Börse AG is also contractually entitled to verify the supplier's compliance with the above obligations and reserves the right to conduct risk-based audits at the direct supplier and its subcontractors, either itself or through third parties commissioned by it, after prior notification.

Deutsche Börse AG is entitled to terminate the contract with the direct supplier for LkSG-related reasons in accordance with the intentions of the legislator only under consideration of the "ultima ratio" principle.

B4. Communication of results

Were the results of the risk analysis(s) for the reporting period communicated internally to key decision-makers?

Deutsche Börse AG confirms that the results of the risk analysis(es) for the reporting period were internally communicated to the relevant decision-makers, such as the Executive Board, the CMF, and the Purchasing department, in accordance with § 5 paragraph 3 LkSG.

B5. Changes in risk disposition

What changes have occurred in terms of priority risks compared to the previous one reporting period?

There have been no changes in the priority risks compared to the previous reporting period.

C. Determination of injuries and Corrective measures

C1. Determination of violations and corrective measures in your own business area

Were there any violations identified in your own business area during the reporting period?

Yes, only abroad.

Indicate: In which topics were violations found in your own business area

The injury in Deutsche Börse AG's own business area was found in the area of disregard for occupational health and safety and work-related health hazards.

Number of injuries in the area of occupational health and safety and work-related health hazards

One violation in the area of disregard for occupational safety and work-related health procedures within the meaning of § 2 paragraph 2 No. 5 a), d) LkSG (failure of an emergency telephone) has been identified.

Describe the appropriate remedial actions you have taken.

After the aforementioned violation was discovered, measures were taken to prevent further infringement. In particular, additional control and inspection measures were initiated to ensure that the relevant occupational safety measures were taken.

In cases where injuries could not be stopped, describe where they occurred.

The injury mentioned could be stopped.

Describe what long-term remedial measures (e.g. follow-up approaches) have been taken and what trade-offs have been made in relation to the selection and design of the measures to end or further minimise.

In addition to the annual functionality check of emergency telephones, they are also checked for functionality after each relocation.

Describe how the effectiveness of the remedial measures is verified.

The effectiveness of the remedial measures is carried out once a year as part of a functionality test of the telephones to ensure that they are technically usable and that they can be used in an emergency.

Did the remedial actions end the breach?

Yes, the remedial actions have resulted in the termination of the breach.

Explain how the remedial actions led to the termination of the breach.

After the CMF became aware of the LkSG-relevant violation in its own business area (abroad) through the effective complaint procedure and thoroughly analysed it, measures were initiated to ensure that emergency telephones are always functional and can be used when needed in the future. For this purpose, a functionality test is conducted once a year and after each relocation of

the telephones. Documents confirming the execution of the functionality test were presented to the CMF.

Have you analysed the extent to which the identified injury is an indication of a possible necessary adaptation/addition to existing prevention measures? Please describe the process, results, and impact of your analysis.

The identified and remedied breach in Deutsche Börse AG's own business area does not constitute an indication of the need to adapt or supplement existing preventive measures.

C2. Identify violations and take corrective action with direct suppliers

Were any injuries identified among direct suppliers during the reporting period?

No.

Describe the procedures used to avoid injuries to direct suppliers can be determined.

Potential or existing violations can be identified at Deutsche Börse AG through the complaint procedure established in accordance with § 8 LkSG and through the tool-based "Negative News Screening" (Sphera). As part of the "Negative News Screening," Deutsche Börse AG receives notifications about (possible) LkSG-related violations by direct and indirect suppliers. In the event of LkSG-relevant "Negative News," the Purchasing department, which is responsible for the tool, notifies the CMF, which consults with Purchasing on further measures.

C3. Determination of violations and remedial action against indirect suppliers

Were any violations identified by indirect suppliers during the reporting period?

No.

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

In what form was a complaints procedure offered for the reporting period?

The company's own complaints procedure.

Describe the company's own process and/or the process in which your company participates.

Deutsche Börse AG has introduced a complaints procedure according to § 8 LkSG, which allows the reporting of (potential) human rights and environmental risks and violations in its own business area as well as with its direct and indirect suppliers.

Leads and reports can be submitted through the LkSG complaints procedure of Deutsche Börse AG. This includes internal persons, such as employees of Deutsche Börse AG or other companies of the Deutsche Börse Group, as well as employees of direct or indirect suppliers. Additionally, it is also open to external persons, such as external consultants engaged by a company of the Deutsche Börse Group or one of its direct or indirect suppliers, and any other persons who become aware of corresponding risks and violations, to submit leads about possible violations or risks through the complaints procedure. The complaints procedure itself and the information provided to employees and external third parties are available in German, English, and French. Information on submitting complaints and reports is published on the website and intranet of the Deutsche

Börse Group (<https://www.deutsche-boerse.com/dbg-de/unternehmen/kontakt/contact-for-whistleblowers>).

Complaint Channels

The LkSG-related complaints procedure has been integrated into the existing electronic whistleblower system (BKMS Whistleblower System) at Deutsche Börse AG, which is used as the central reporting and lead channel within the Deutsche Börse Group. The BKMS Whistleblower System was implemented at Deutsche Börse AG in compliance with the Whistleblower Protection Act (HinSchG) and aims to uncover illegal or unethical behavior in all business relationships of the Deutsche Börse Group. In addition to numerous focus categories (market manipulation, fraud, violation of internal conduct guidelines, or other compliance-relevant violations) for leads and complaints, a dedicated new lead category "Violation of protected legal interests within the meaning of the Supply Chain Due Diligence Act (LkSG)" has been included in the BKMS Whistleblower System. Through this lead category, persons can complain about possible human rights or environmental risks or possible violations of human rights or environmental obligations arising from the economic activities of a company belonging to the Deutsche Börse Group or one of its direct or indirect suppliers.

LkSG-related complaints can also be submitted by phone through the BKMS Whistleblower System of Deutsche Börse AG. In the case of a telephone complaint, the complainant is guided through an automated telephone dialogue. During this process, the complainant can describe their concern in detail and answer some questions that help Deutsche Börse AG to classify the matter. After submitting a complaint through the electronic or telephone BKMS Whistleblower System, the complainant can set up a protected mailbox through which feedback from the complaint handler can be viewed, and the complainant is informed about the status of the investigation.

In addition to the web-based and telephone BKMS Whistleblower System, Deutsche Börse AG has set up a functional email address (humanrightsofficer@deutsche-boerse.com), through which LkSG-related complaints can be directly submitted to the responsible complaint handlers and the human rights officer.

Leads, reports, and complaints through the BKMS Whistleblower System can be submitted while maintaining the anonymity of the complainant. The complainant's information is treated strictly confidentially, regardless of the complaint channel, and is only passed on to the persons responsible for further investigation of the complaint or report.

Handling of Complaints

As soon as a complaint under the category "Violation of protected legal interests within the meaning of the Supply Chain Due Diligence Act (LkSG)" is received through the BKMS Whistleblower System, the complaint handler receives an email notification of the receipt of a report. For complaints and reports via email to the human rights officer, communication with the complainant takes place via email or through the contact details provided by the complainant. The complaint handler confirms receipt of the complaint within seven days of receiving the complaint and informs the complainant about the next steps, the timeline of the procedure, and their rights regarding protection against disadvantage or punishment due to the procedure, as well as the use of other formal complaint procedures. The complaint handler checks whether the content of the complaint

constitutes a possible violation of a human rights or environmental obligation within the meaning of § 2 paragraph 4 LkSG or a human rights or environmental risk within the meaning of § 2 paragraphs 2 and 3 LkSG. If the complaint does not fall within the substantive scope from the outset, the complainant is informed accordingly. If the complaint is deemed plausible, further steps are taken to clarify the facts. If the complaint handler determines after thorough examination of the facts based on the findings that the complaint is valid, Deutsche Börse AG takes appropriate measures in accordance with the LkSG.

Which potentially interested parties have access to the complaint's procedure?

- Own employees
- Communities near own locations
- Employees at suppliers
- External stakeholders such as NGOs, trade unions, etc.

How will access to the complaint's procedure be for the different groups of potential those involved?

- Publicly accessible rules of procedure in text form
- Information about accessibility
- Information about the process
- All information is clear and understandable
- All information is publicly available

Publicly accessible rules of procedure in text

Optional: Describe.

Deutsche Börse AG publishes a procedural regulation "Submission and processing of human rights and environmental complaints in Deutsche Börse Group", which, in addition to general information on the complaint procedure in accordance with paragraph 8 LkSG, describes access to the complaint procedure and complaint processing. The rules of procedure are published in German and English on Deutsche Börse Group website with the general information on the BKMS whistleblower system in a dedicated PDF file. The works council of Deutsche Börse AG and the employees of Deutsche Börse Group were informed about the expansion of the BKMS whistleblower system to include a dedicated complaint category for LkSG-related complaints via the company's internal intranet.

Information about accessibility

Optional: Describe.

The accessibility of the complaint's procedure is described on Deutsche Börse Group website, on its intranet and in the dedicated rules of procedure.

Information about the process

Optional: Describe.

The information on the complaint processing process is published in the rules of procedure "Submission and processing of human rights and environmental complaints in Deutsche Börse Group".

In addition, Deutsche Börse AG points out the possibility of contacting the central monitoring function or the Human Rights Officer directly via an email address set up for this purpose if you have any questions about the process. The contact details are provided in the rules of procedure and on Deutsche Börse Group website for the general information on the BKMS whistleblower system.

All information is clear and understandable

Optional: Describe.

The information published for the various groups is written in simple German, English and French.

All information is publicly available

Optional: Describe.

All relevant information is publicly available.

Were the rules of procedure for the reporting period publicly available?

Yes. Click here for the Rules of Procedure in German, English and French.

https://www.deutsche-boerse.com/re-source/blob/3380294/63bb84d2615a3dabd3bed383cb044240/data/prozess-beschreibung_de.pdf

https://www.deutsche-boerse.com/re-source/blob/3380292/fb8e66ff3214fab561db731d0ca667ab/data/process-description_en.pdf

https://www.deutsche-boerse.com/re-source/blob/3947108/13f7653663adf54a0a791c820a7a744a/data/process-description_fr.pdf

D2. Requirements for the complaints procedure

Indicate the person(s) responsible for the procedure and their function(s).

(1) Responsibility for the availability and functionality of the BKMS whistleblower system

The BKMS Whistleblower System is centrally managed by the Anti-Financial Crime (AFC) team within the Group Compliance function of Deutsche Börse AG. The AFC team is particularly responsible for ensuring that the handlers responsible for LkSG-related complaints have access to the BKMS Whistleblower System and that complaints of a human rights or environmental nature reach the responsible complaint handlers. The IT-related functionality of the BKMS Whistleblower System is managed by the IT function of Deutsche Börse AG (testing, IT security, etc.).

(2) Responsibility for handling complaints

Two individuals in the Group Compliance department within the Law & Regulation team are responsible for handling complaints, regardless of the complaint channel through which they are received (complaint handlers). Both complaint handlers have extensive expertise in the Supply Chain Due Diligence Act (LkSG) and relevant BAFA guidelines, as well as professional competence in handling complaints. When handling complaints, the complaint handlers adhere to the guidelines for the complaint handling procedure, which consider the requirements of § 8 LkSG, relevant

BAFA guidelines and FAQs, and internal regulations of Deutsche Börse AG. The complaint handlers regularly coordinate with each other during the handling process and report to the human rights officer.

Deutsche Börse AG confirms that the criteria contained in § 8 paragraph 3 LkSG for the responsible persons are met, i.e., that they guarantee impartial action, are independent and not bound by instructions, and are obliged to maintain confidentiality.

Deutsche Börse AG confirms that precautions were taken for the reporting period to protect potentially involved parties from disadvantage or punishment due to a complaint.

Describe what precautions have been taken, how the complaints procedure ensures the confidentiality of the identity of whistleblowers.

Deutsche Börse AG ensures that the privacy of complainants and other whistleblowers is protected through appropriate data security and confidentiality measures. Any collection, processing, or use of personal data is minimized and deleted as soon as possible. Access to personal data is restricted exclusively to authorized employees (particularly the LkSG complaint handlers and the human rights officer). Complainants also have the option to submit leads about possible violations anonymously.

Within the framework of the LkSG-related complaint procedure and the whistleblower system, it is ensured that persons who report violations in good faith receive the highest possible confidentiality and protection against actual or threatened retaliation or reprisals due to the information they provide.

Describe what precautions have been taken, what other measures will be taken to protect whistleblowers.

The circle of complaint handlers is deliberately kept small. Personal data is anonymized.

D3. Implementation of the complaint's procedure

Were there any reports received about the complaint's procedure during the reporting period?

Yes.

Please provide further details on the number, content, duration and results of the procedures.

In total, three human rights and environment-related complaints were received in 2024 via the complaint channels provided. All complaints received have been thoroughly reviewed and finally processed.

On what topics have complaints been received?

Human rights risks

- Disregard for occupational health and safety and work-related health hazards (within the meaning of § 2 para. 2 no. 5 a), c), d) LkSG).

Other human rights risks

- An act or omission in breach of duty that is directly likely to impair a protected legal position in a particularly serious manner and the illegality of which is obvious on a reasonable assessment of all the circumstances under consideration (within the meaning of § 2 para. 2 no. 12 LkSG).

Describe what conclusions were drawn from the complaints/tips received and to what extent these findings led to adjustments in risk management.

Two of the complaints received by Deutsche Börse AG were deemed unfounded after a substantive review. Both cases concerned the own business area of Deutsche Börse AG, but no violation of an LkSG legal position could be identified.

In another complaint, a violation related to occupational safety and health within the meaning of § 2 paragraph 2 No. 5 a), d) LkSG was confirmed. Immediate appropriate measures were taken (see already C1 "Identification of Violations and Remedial Measures"). The complaint procedure includes a comprehensive review of the facts and a preliminary plausibility check to filter out complaints that are obviously not within the substantive scope of the LkSG, are clearly misleading, incomprehensible, fabricated, or without factual basis, and do not rely on facts.

The risk management remained unchanged in this respect. For further specific conclusions in individual cases, see also C1 "Determination of injuries and Corrective measures."

E. Risk management review

Does a process exist that ensures risk management is appropriate and comprehensive?

In which subsequent areas of risk management is appropriateness and effectiveness tested?

- Resources & Expertise
- Risk analysis and prioritization process
- Preventative measures
- Corrective measures
- Complaints procedure
- Documentation

Describe how this test is carried out for the respective area and for which purposes. Describe the process especially about the prioritized risks.

Deutsche Börse AG reviews at least once a year and on an event-driven basis the adequacy and effectiveness of the measures taken to implement and comply with the due diligence obligations under the LkSG, with regard to the identified human rights risks in its own business area and direct suppliers that pose a prioritized risk. For this purpose, a monitoring framework for LkSG-related controls has been created at Deutsche Börse AG, which is integrated into the group control framework of Group Compliance. The monitoring framework for LkSG-related controls is managed

by the CMF.

The review of due diligence obligations was conducted in those areas of Deutsche Börse AG where processes for implementing and complying with the due diligence obligations under the LkSG are located and implemented (Purchasing, Group ESG Strategy, Group Human Relations, Group Compliance). The controls are based on a control plan and are carried out by the CMF together with another employee from the control team in Group Compliance.

1. The controls are announced in the affected area.
2. The documents that serve as the basis for the review of processes and samples are requested.
3. The control action is documented and (potential) findings are recorded.
4. The findings and the severity of the findings are discussed with the affected department and an appropriate deadline for their resolution is agreed upon.
5. A findings report is prepared by the CMF and sent to the affected department.
6. The resolution of the findings within the agreed deadline is tracked by the CMF and reported to the human rights officer of Deutsche Börse AG. The human rights officer decides at their discretion in which cases the responsible board is informed.

The following controls were conducted and completed for the fiscal year 2024 at Deutsche Börse AG:

- Adequacy and effectiveness of the risk analysis implemented and conducted according to § 5 LkSG;
- Adequacy and effectiveness of the preventive measures implemented and conducted according to § 6 LkSG;
- Adequacy and effectiveness of the remedial measures implemented according to § 7 LkSG;
- Adequacy and effectiveness of the complaint procedure implemented according to § 8 LkSG and the handling of complaints.

As part of the control actions, the presence of appropriate resources and expertise of the responsible employees as well as the documentation requirements of § 10 paragraph 1 LkSG were reviewed.

No violations of the due diligence obligations under the LkSG were identified. The findings related to internal processes and documents, which were adjusted for the purpose of improved organizational workflow and documentation.

Are there processes or measures in place to ensure that when setting up and implementing risk management, the interests of your employees, those within your supply chains and those who are otherwise affected by the economic activities of your company or by the economic activities? The actions of a company in your supply chains in a protected legal position that may be directly affected should be adequately considered.

In which areas of risk management do processes or measures exist to take the interests of those potentially affected into account?

- Resources & Expertise
- Preventative measures
- Corrective measures
- Complaints procedure

Describe the processes or measures for the respective area of risk management.

Resources & Expertise

As previously stated, the initial implementation of the due diligence obligations according to the LkSG was carried out with the existing resources of Deutsche Börse AG, involving all departments affected by the LkSG. For the ongoing implementation and compliance with the due diligence obligations, Deutsche Börse AG has created several additional full-time positions to fully meet the requirements of the LkSG. Deutsche Börse AG regularly ensures that qualified employees are always entrusted with the topic of the LkSG, who possess the necessary expertise and handle the tasks carefully. Additionally, it is regularly reviewed whether the available resources are sufficient.

Prevention measures

To mitigate the risks identified in the risk analysis, Deutsche Börse AG has implemented appropriate preventive measures, considering its stakeholders. These preventive measures are intended to prevent human rights risks in Deutsche Börse AG's own business area and at direct suppliers, as well as potentially further risks within the supply chain. These preventive measures are designed to protect stakeholders who may have been affected by injuries. As part of risk management, the preventive measures are regularly reviewed and adjusted if necessary. If a violation of a human rights or environmental duty is detected, it is analysed and appropriate preventive measures are implemented and, if necessary, (further) measures are implemented to prevent a new violation.

Corrective measures

If Deutsche Börse AG discovers or is imminent a violation of a protected legal position of the LkSG in its own business area or at a direct supplier, the company shall immediately take appropriate remedial measures to prevent, minimise or put an end to the infringement.

Complaints procedure

Complaints and leads from employees of the Deutsche Börse Group, employees within the supply chains, and those who may be directly affected in a protected legal position by the economic activities of companies within the Deutsche Börse Group or by the economic activities of a company in the supply chains of the Deutsche Börse Group can be addressed through the provided complaint channels. When designing the complaint channels, the capabilities and needs of the identified target groups were considered, although without active involvement, through the characterization of the supply chain and the target group itself. Deutsche Börse AG has informed both its employees and other stakeholders, particularly its direct suppliers, about the possibility of submitting complaints regarding (potential) violations of human rights and environmental obligations under the LkSG. Employees of Deutsche Börse AG and other subsidiaries were particularly

informed about the possibility of submitting complaints under the LkSG via a message on the homepage of the Deutsche Börse Group intranet. The works council of Deutsche Börse AG was also informed about the complaint procedure under the LkSG in a dedicated meeting. Direct suppliers of Deutsche Börse AG, as well as the companies within the own business area of Deutsche Börse AG, are informed about the possibility of submitting LkSG-related complaints through the so-called "Download Center" (space for documents from the purchasing area). Here, direct suppliers are provided with the "Procedure for Handling Complaints." Additionally, direct suppliers, where a high or very high risk was identified in the risk analysis according to § 5 LkSG, receive the procedure and a notice about the possibility of submitting corresponding complaints in an email from the purchasing department of Deutsche Börse AG. Furthermore, the possibility of submitting LkSG-related complaints is also indicated on the publicly accessible website of the Deutsche Börse Group.