

# UK Modern Slavery Act Statement on Transparency for 2022

## Preamble

Deutsche Börse Group is committed to protecting and upholding human rights around the world. Our commitment is embedded in our corporate culture and values and reflected in our policies and actions. In doing so, we are holding our employees, business partners and clients as well as the communities in which we operate accountable. This makes our commitment to human rights a vital component of our purpose to create trust in the markets of today and tomorrow.

Moreover, Deutsche Börse Group is committed to a high degree of transparency towards its stakeholders – along every step of the value creation chain. Deutsche Börse AG therefore endorses the UK Modern Slavery Act 2015 by publishing a statement under section 54 of this legislation to outline the steps taken to prevent slavery and human trafficking in its own operations and supply chains.

This Statement relates to Deutsche Börse Group's fiscal year ending on 31 December 2022 and covers all following legal entities and branches pursuing business activities in the United Kingdom.<sup>1</sup>

## About Deutsche Börse

Deutsche Börse AG, which is headquartered in Frankfurt/Main, Germany, is the parent company of Deutsche Börse Group. As at 31 December 2022, the Group employed 11,078 people at 55 locations worldwide. As one of the largest providers of market infrastructure worldwide, we offer our clients a broad range of products and services. These cover the entire financial market transaction process chain: from ESG business, indices, and analytical solutions (data & analytics), trading and clearing services and price and reference data based on them (trading & clearing), and the settlement of transactions right through to the custody of securities and funds, as well as services for liquidity and collateral management (fund services and securities services). We also develop and operate the IT systems that support all these processes. In addition to securities, our platforms are used to trade foreign exchange, commodities, and derivatives.

Our business takes place in four segments: data & analytics, trading & clearing, fund services and securities services. This structure is used for the internal Group controlling and forms the basis for our financial reporting.

## Our purpose and values

Deutsche Börse Group's business activities are based on the legal frameworks and ethical standards of the different countries in which it operates. Beyond our general conviction that this is a vital contribution to protect and promote human rights, our code of business conduct and various corporate policies obligate us to do so.

Deutsche Börse Group is fully committed to respect human rights and to take the actions set out in this Statement to

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<sup>1</sup> Eurex Clearing AG, Clearstream Banking S.A., Clearstream FundCentre AG, Deutsche Börse AG, Eurex Frankfurt AG, Eurex Repo GmbH, Crypto Finance AG, 360 Treasury Systems AG, 360 Trading Networks Inc., 360TGTX, Quantitative Brokers LLC, European Energy Exchange, STOXX LIMITED, Qontigo Index GmbH, INDEX PROXXY Ltd., Axioma (UK) Limited, Clearstream Nominees Limited, Clearstream International S.A., Clearstream Banking AG, Kneip Communication S.A. (Dataglide Ltd.), ECC AG, ECC Lux S. à r. l., EPEX Spot SE, KB Tech Limited, Grexel Systems

fulfil its responsibilities as set by a wide range of international external standards and principles. In particular, the Group underscores the values to which it attaches importance by joining initiatives and organisations that stand for generally accepted ethical standards. Among these are Deutsche Börse Group's commitments as participant in the United Nations Global Compact, as signatory of the Diversity Charter and the International Labour Organization's Labour Standards.

Fair working conditions in international supply chains are the foundation of prosperity in a globalized world. For this reason, human rights must be respected, observed, and protected throughout companies' supply chains – such action is a fundamental aim of Deutsche Börse Group as well. We acknowledge that slavery and human trafficking exist in many jurisdictions in which we operate, and from which we procure goods or services. Deutsche Börse Group is strongly committed to ensuring that our operations and supply chains are free of modern slavery and human trafficking.

### **Our Actions**

For many years, we have been committed to protect human rights as part of our relationships with suppliers. Our commitment to human rights is firmly incorporated into our corporate culture and our values and is reflected in our internal company policies and actions. Our commitment is thus an essential part of our company's mission – creating trust in the markets of today and tomorrow.

In particular, Deutsche Börse AG and centrally-serviced Group entities have introduced various measures to analyse, manage and reduce the risk of human rights violations in our supply chain. With this aim, Deutsche Börse AG and centrally-serviced Group entities require suppliers to make a contractual commitment to the observance of ethical standards of conduct in their dealings with employees, suppliers, customers and other third parties. All of this is done in accordance with our *Human Rights Statement*, the *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 the risk analysis, 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 human rights at suppliers in the supply chain, taking a systemic and proactive approach across all ESG dimensions. In the event of a risk occurring, the early warning system issues alerts, which are then manually 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. Group Compliance assumes a supervisory function in this.

Our ongoing assessment is that Deutsche Börse AG and centrally-serviced Group entities are at low risk of slavery or human trafficking occurring within our own business. Due to that, our actions in the reporting year focused primarily on our supply chain.

As a general rule, new suppliers of Deutsche Börse AG and/or centrally-serviced Group entities have to commit to Deutsche Börse Group's code of conduct for suppliers, which has resulted in a continuous, steady rise in the number of suppliers committed to the code of conduct for suppliers.

Appropriate preventive or, in consideration of the specific case involved, corrective measures are introduced based on the identified risks and possible violations. These measures include in particular:

- The implementation of the human rights strategy set out in the policy statement in relevant business processes.
- The development and implementation of appropriate procurement strategies and purchasing practices that will avoid or mitigate identified risks.
- The training of employees in each relevant business area.

- Controls that are based on a risk profile and used to assess compliance with the human rights strategy contained in the policy statement in our own operations.

Deutsche Börse Group regularly provides trainings for employees and suppliers on our human rights approach in line with the above priorities and related policies. Furthermore, Deutsche Börse Group conducts periodic trainings to reinforce employees' awareness of activities linked to potential human rights violations. One example is an online course on anti-money laundering (AML) and the prevention of terrorist and proliferation financing and tax evasion, topics that have potential connections to human rights violations.

### Grievance procedure

Deutsche Börse Group practices a zero-tolerance policy in terms of unethical behaviour in business. Whenever we learn of a violation of the values of Deutsche Börse Group's human rights policy, we will work on a collaborative basis with our employees and suppliers to correct the violation and help to prevent future incidents. In order to detect (potential) violations, we established a grievance procedure via the whistleblower system of the BKMS platform through which our employees and other stakeholders can (anonymously) report known or suspected violations. Our aim is to arrange that individuals who report violations in good faith receive the utmost confidentiality and the greatest possible protection from actual or potential retaliation or reprisals arising from the information they provide. The grievance procedure also applies to third parties, including indirect suppliers. If a complaint is lodged risk analysis and preventive measures in the sense of the above requirements are applied, a corrective action plan is drawn up and the policy statement is updated if necessary. The same applies if Deutsche Börse Group otherwise becomes aware of factual indications which give rise to the possibility of a violation of a human right at third parties, including indirect suppliers.

### Approval of this statement

Deutsche Börse Group's stance on the UK Modern Slavery Act 2015 will be reviewed on a yearly basis; the Executive Board of Deutsche Börse AG decides on potential changes in policy, if necessary. This statement has been examined and approved by Deutsche Börse AG's Executive Board on 21<sup>st</sup> July 2023.



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