

C0. Introduction

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C0.1

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**(C0.1) Give a general description and introduction to your organization.**

Deutsche Börse AG was established in 1992 and is a global company based in Frankfurt/Main, Germany. It is the parent company of Deutsche Börse Group. As of 31 December 2021, Deutsche Börse Group employed a total of 10,200 staff (31 December 2020: 7,238), from 109 nationalities at 69 locations around the globe. 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 the ESG business, indices and analytical solutions (pre-trading), 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 (posttrading). 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 eight segments, which are organised as Pre-trading, Trading & clearing and Post-trading. This structure is used for the internal Group controlling and forms the basis for our financial reporting.

C0.2

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**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2021	December 31 2021	No	<Not Applicable>

C0.3

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**(C0.3) Select the countries/areas in which you operate.**

- Argentina
- Australia
- Austria
- Belgium
- Brazil
- Canada
- Czechia
- Denmark
- Finland
- France
- Germany
- Hong Kong SAR, China
- India
- Ireland
- Italy
- Japan
- Luxembourg
- Malaysia
- Mexico
- Netherlands
- Philippines
- Poland
- Singapore
- Spain
- Sweden
- Switzerland
- United Arab Emirates
- United Kingdom of Great Britain and Northern Ireland
- United States of America

C0.4

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**(C0.4) Select the currency used for all financial information disclosed throughout your response.**

EUR

C0.5

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**(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.**

Operational control

C0.8

**(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	DE0005810055

C1. Governance

C1.1

**(C1.1) Is there board-level oversight of climate-related issues within your organization?**

Yes

C1.1a

**(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.**

Position of individual(s)	Please explain
Chief Executive Officer (CEO)	The CEO oversees the overall strategy of the Group and therefore also the Group's sustainability strategy which also includes DB1s climate strategy. The Group-wide sustainability management (the Unit Group ESG strategy) is assigned to his area of responsibility.
Chief Financial Officer (CFO)	<p>In 2021, the CFO chaired the Group Sustainability Board (GSB), which assures an overview and steering of all sustainability related topics, including climate-related issues, e.g. the Group's CO2 neutrality and the climate strategy. The Board convenes four times a year and in 2021 its members comprised one representative from each of the Executive Board divisions, plus the Head of Group ESG Strategy and one Executive Board member. In his role as chairman of the Group Sustainability Board the CFO have various climate-related tasks and responsibilities. For example the CFO has the final responsibility for the further development of the Group-wide sustainability strategy along the entire value chain and the advice of the Executive Board on sustainability related issues. Moreover he (together with the other GSB members) reviews current ESG KPI's and develops further targets for Deutsche Börsen environmental management. Besides chairing the Group Sustainability Board in 2021, the CFO is responsible for the annual report as well as risks.</p> <p>Integral part of the annual report is the integrated sustainability report (non-financial declaration). We want to lead by example and offer our stakeholders information which is relevant to them. Deutsche Börse is further enhancing the quality of its sustainability reporting in the 2021 annual report by publishing its first full integrated report, offering a holistic view on the business performance at Deutsche Börse and firmly embedding social responsibility and sustainability in all business areas.</p> <p>Climate related risks are regularly reviewed and evaluated by the Group Risk Committee and the Supervisory Board Risk Committee. Specific risk related topics are prepared and discussed in due time and close cooperation.</p>

C1.1b

**(C1.1b) Provide further details on the board's oversight of climate-related issues.**

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	<ul style="list-style-type: none"> <li>Reviewing and guiding strategy</li> <li>Reviewing and guiding major plans of action</li> <li>Reviewing and guiding risk management policies</li> <li>Reviewing and guiding annual budgets</li> <li>Reviewing and guiding business plans</li> <li>Setting performance objectives</li> <li>Monitoring implementation and performance of objectives</li> <li>Monitoring and overseeing progress against goals and targets for addressing climate-related issues</li> </ul>	<Not Applicable>	<p>After each meeting of the Group Sustainability Board, there is a slot in the Executive Committee for sustainability-related topics, which of course include climate issues. This way, the Executive Board keeps an eye on the impact of Deutsche Börse Group's corporate activity along the entire value chain. In addition, it seeks to strengthen awareness of the importance of medium and long-term opportunities and risks of business activities in connection with climate change across the entire group of companies. Based on the analyses and discussions of the GSB, the Executive Committee makes the final decisions, reviews and formulates the Group-wide ESG strategy and further develops Deutsche Börse's environmental management approach and its climate strategy. The Board reviews and approves on an annual basis the annual report with its integrated sustainability report (non-financial declaration) as well as the GRI index which includes all fundamental environmental KPIs.</p> <p>Besides that, individual meetings are conducted, for example there were several meeting of the Head of Group ESG Strategy and the CEO on the topic of Deutsche Börse Group's climate strategy and the CO2 neutrality, as well as with regard to the further strategic integration of climate-related KPI's into the classical financial key figures (TCFD reporting) or the further integration of climate-related aspects into the risk assessment framework.</p> <p>At the Supervisory Board level it is mainly the newly formed Strategy and Sustainability Committee that deals with ESG, advising the Executive Board on matters of strategic importance. These include sustainable corporate governance and DB1's ESG business activities.</p>

**C1.1d**

**(C1.1d) Does your organization have at least one board member with competence on climate-related issues?**

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	Yes	The major criteria for assessing the competence of board member(s) on climate-related issues is the prior work experience in a high-level management role concerning ESG-related topics. The CFO has been chairing the Group Sustainability Board for the past three years, managing and initiating all (strategy-related) ESG initiatives of Deutsche Börse and gaining valuable and highly relevant expertise on managing climate-related issues.	<Not Applicable>	<Not Applicable>

**C1.2**

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Sustainability committee	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly
Risk committee	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Chief Executive Officer (CEO)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other, please specify (Supervisory Board)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Chief Sustainability Officer (CSO)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Facility manager	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly
Chief Risks Officer (CRO)	<Not Applicable>	Other, please specify (Assessing and managing climate-related risks)	<Not Applicable>	More frequently than quarterly

## C1.2a

**(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).**

Climate change poses both risks and opportunities for business. As the Earth's temperature rises, increasingly common natural disasters are disrupting ecosystems and human health, causing unanticipated business losses, and threatening assets and infrastructure. Investors, customers, analysts and not least the regulators are increasingly calling on companies to disclose core climate-related opportunities and risks alongside the conventional financial indicators.

To meet these expectations, counter potential risks early on but also identify future business areas, DBG established a Sustainability Committee - the Group Sustainability Board (GSB) - in July 2016. The GSB is the key decision-making body for sustainability issues, including climate change. The board has one member from each Board division, the Head of Group ESG Strategy plus one Executive Board member (2021: CFO). Its tasks are to develop the Group-wide sustainability strategy (comprising the climate strategy) and to advise the Executive Board of Deutsche Börse AG on sustainability issues. Cross-divisional issues such as climate change, other ESG issues and their reporting are discussed, and the results and identification of the associated opportunities and risks are reported to the Executive Board on a regular basis. This way, the Executive Board keeps an eye on the impact of Deutsche Börse Group's corporate activity along the entire value chain. In addition, it seeks to strengthen awareness of the importance of medium and long-term opportunities and risks of business activities in connection with climate change across the entire group of companies. Based on the analyses and discussions of the GSB, it makes the final decisions and formulates the Group-wide approach to sustainability issues. The CEO oversees the overall strategy of the Group and therefore also the Group's sustainability and climate strategy. Individual meetings are conducted- there were several meeting of the Head of Group ESG Strategy and the CEO on the topic of Deutsche Börse Group's climate strategy and the CO2 neutrality, as well as with regard to the further strategic integration of climate-related KPI's into the classical financial key figures (TCFD reporting) or the further integration of climate-related aspects into the risk assessment framework. After each meeting of the GSB, there is a slot in the Executive Committee for sustainability-related topics, which of course include climate issues.

The Head of Group Organizational Services, which includes the Facility Management and Purchasing department, is also member of the Group Sustainability Board and overviews and monitors the environmental performance of Deutsche Börse's business operations.

The Chief Sustainability Officer, who leads the Group ESG Strategy department, is - together with its team - responsible for the strategic analysis of climate-related challenges and global trends and prepares the meetings of the GSB. He compiles specific sustainability-related information for the individual business areas, anchors sustainability in the core business and is engaged in a regular exchange on climate-related issues with a large number of internal and external stakeholders.

The Group-wide recording and monitoring of risks by Group Risk Management (GRM) is another key element to identify ESG risks in the business model and risk/corporate strategy of DBG. The individual business areas thus also establish climate-related risks and report them to GRM on a regular basis or, in urgent cases, immediately. The GRM evaluates the risk potential under the leadership of the Chief Risk Officer and decides how it should be managed by the business areas. The Chief Risk Officer, who is the highest ranking person with dedicated risk management responsibility on an operational level, reports directly to the CFO and has regular status Meetings. In turn, GRM reports to the responsible Executive Board members and bodies.

With the help of the information from GRM and Group ESG Strategy, the Group Risk Committee (GRC) reviews the Group's climate-related risk exposures. The GRC is an internal risk committee at management level. It is headed by the Chief Financial Officer and is positioned at the interface between GRM and the Executive Board or Supervisory Board of Deutsche Börse AG and the relevant board committees. At EEX the Chief Executive Officer - together with other board members - is managing EEX's business strategy where possible climate-related risks and opportunities are part of. The strategy is reviewed at least once a year and climate-related issues are monitored this way.

Moreover, the Risk Committee of the Supervisory Board monitors the risk management system and its continuing improvement in light of the risk strategy and the Supervisory Board of DBAG monitors the effectiveness of the risk management system as a whole and evaluates the overall risk strategy and risk management system.

## C1.3

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	

## C1.3a

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Facilities manager	Monetary reward	Efficiency target	One of the core responsibilities of our facility management department is to plan, optimise, monitor and control capacity related purchases, system utilisation and efficient usage of resources. The overall efficiency targets are hence related to the performance of the overall department rather than the goals of a single person. Nevertheless employees are rewarded with a yearly bonus if they perform very well in their respective jobs.
Corporate executive team	Monetary reward	Other (please specify) (Product development target)	Deutsche Börse Group holds a majority share in European Energy Exchange AG (EEX), Leipzig, Germany. The product and service offerings of EEX and its subsidiaries focus on energy and energy-related markets (e.g. power, gas, emission allowances). By providing liquid, secure and transparent markets, EEX group plays an important role for improving the efficient functioning of these markets that are directly linked to questions of climate change. This includes the continuous development of new products and services, providing market solutions to support the long-term transition of Germany's and Europe's energy system towards a higher share of carbon-free, renewable energy sources. EEX is constantly developing new support within the framework of the German "Energiewende" and wider EU climate and energy policy. This includes the long-term 2030 and 2050 climate and energy policy targets. Besides power markets, EEX operates a regulated market for emissions allowances and hosts the central auction platform for the EU ETS, organizing regular auctions on behalf of 27 EU Member States including 25 countries which form a EU-wide auction platform to be coordinated by the European Commission as well as Germany and Poland. Furthermore, it provides an exchange-traded market in Guarantees of Origin (GoOs) for electricity from renewable energy sources and is developing new hedging instruments to address the effects of increasing power generation from renewables. The executive team of EEX and the heads of unit are rewarded based on the successful introduction of new products and services and increase of market shares in existing products and services as well as broadening the membership base, thereby generating business solutions closely tied to climate change issues. In the on-going transition to an energy system with a higher share of renewables, EEX is taking an active role by introducing new products to support this process, and adapting existing products. One example for the latter is the introduction of shorter lead times for power trading, thereby supporting the integration of renewable energy. Through extending its membership base, EEX is actively supporting new players in the power market, which is a core requirement for an efficient transition of the energy system.
Environment/Sustainability manager	Monetary reward	Behavior change related indicator	Individual goals of the sustainability team are related to communicating climate change issues internally and externally. Reaching those goals is incentivised through bonus payments.
All employees	Non-monetary reward	Behavior change related indicator	All staff in Germany is provided the opportunity to receive a job ticket to incentivise the reduction of the employees CO2 footprint.
Board/Executive board	Monetary reward	Emissions reduction target	The Supervisory Board of Deutsche Börse AG has redesigned the remuneration system of the Executive Board. The new remuneration system from 2021 on is closely aligned with the current corporate strategy "Compass 2023" and geared to the long-term. Thereby, it sets holistic performance incentives for both a strong financial performance and also an environmental and social development based on a transparent and professional governance. This holistic approach to the new remuneration system forms the basis for Deutsche Börse Group's long-term and sustainable development. By integrating ESG targets into the Performance Shares, Deutsche Börse AG emphasises its holistic focus on its corporate responsibility and secures its long-term success.  One core target is to achieve and maintain CO2 neutrality for Deutsche Börse Group. The potential target achievement for the final number of Performance Shares to be determined on the basis of this performance criterion, which is weighted at 6.25%, ranges from 0% to 120%. To further incentivise the achievement of CO2 neutrality, the target achievement has been linked to an additional condition: The CO2 emissions per workplace must be reduced.

**C2. Risks and opportunities**

**C2.1**

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

**C2.1a**

**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	0	1	The risk management cycle runs with a 12 month time horizon. The overall risk profile is reviewed on an annual basis. The Group holds an equity buffer (required economic capital) based on a 99.90% quantile of its Value-at-Risk Model.
Medium-term	1	5	In addition to the 12 month time horizon, capital planning is performed on a multi-year time horizon. Further to this are the Risk Maps which cover emerging risks and consider the likelihood and impact of risks with a 5 year time horizon.
Long-term	5	100	Further to the 5 year time horizon, longer term risks are analysed from a strategic perspective. Additionally, the time horizons of 10 and 30 years will be considered esp. as part of the TCFD (from 2022).

**C2.1b**

**(C2.1b) How does your organization define substantive financial or strategic impact on your business?**

From Operational Risk perspective, the substantive financial impact is mainly caused by the Material scenarios which are defined as Top 10 scenarios as regards maximum loss amounts (group-wide perspective) and Top 10 scenarios as regards expected maximum losses (maximum loss multiplied by probability of occurrence p.a. (group-wide perspective) and scenarios that have comparatively high impact [ $\geq 10\%$ ] on Required Economic Capital figure of DBAG or banking regulated entities of DBAG. In addition, 5-year Risk Map defines risks with a financial impact of EUR 20 million - EUR 100 million Major Impact and risks with a financial impact above EUR 100 million Critical Impact.

**C2.2**

**(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.**

**Value chain stage(s) covered**

Direct operations

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Medium-term

**Description of process**

Concrete climate-related risks are analysed and reviewed on an annual basis. The Risk-map process includes climate-related risks and is performed every 2-3 months and has a 5 year horizon. Those are presented to the Group Risk Committee and the Risk Committee of Supervisory Board and reviewed by the business owners before each meeting. All new and existing risks are assessed and reported on a quarterly basis (ad-hoc when necessary) to the Executive Board of DBAG.

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**Value chain stage(s) covered**

Direct operations

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

Annually

**Time horizon(s) covered**

Short-term

**Description of process**

On a short-term horizon (12 months), an annual review of Operational Risk is conducted and risks are assessed in terms of probability and severity. Climate-related risks then enter a simulation together with other risks. For Operational Risks, Deutsche Börse Group performs a Value-at-Risk calculation and holds Equity at a confidence level of 99.90%.

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**Value chain stage(s) covered**

Direct operations

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

Annually

**Time horizon(s) covered**

Short-term

**Description of process**

For the banking regulated entities of DBAG, Group Risk Management annually reviews and updates the Risk Inventory items that are relevant for DBAG including the ESG (and climate-change) risks. The E,S, G drivers/impacts are identified through E,S,G flagging. Climate related risks are covered by the E. These risk items are mapped with the current risk framework (current scenario templates) to ensure full coverage. In addition, Risk Inventory materiality assessments are performed for each risk cluster, explaining how each risk item is impacted by E, S, and G risks (input for this is received from the DBG ESG Strategy team and then interpreted on the legal entity level by the entity's risk management teams). Materiality assessment is on an entity basis, adapting to the specific business model and set up of the entity (Aggregated Risk Type management teams).

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**C2.2a**

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**(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?**

	Relevance & Inclusion	Please explain
Current regulation	Relevant, always included	Considered in risk assessments for Operational Risk by covering all potential fines and adverse consequences of current regulation. Deutsche Börse considers financial disclosure regulations affecting their listed companies, e.g. the EU Directive 2014/95/EU on the disclosure of non-financial and diversity information (NFR Directive). Increased regulatory focus on climate change can lead to enhanced disclosure requirement for our listed companies, with higher transaction costs associated with the status of listed company (as opposed to privately held) and is therefore considered relevant. Assessments are conducted regularly through our political affairs team and our risk management team through a regulatory risk map. These heat map items are also flagged with E,S and G flags.
Emerging regulation	Relevant, always included	Emerging regulation is part of the Business Risk assessment and considers all regulation which may adversely impact planned EBITDA. Deutsche Börse routinely identifies and assesses risks from emerging regulation risks through its Group Regulatory Strategy Department Group Sustainability Department is part of, with ongoing monitoring of regulatory developments coordinated through experts. Moreover, there exists a regulatory risk map, with which the emerging regulation is monitored. For example, in the EU e.g. the EU Sustainable Finance Disclosure Regulation (SFDR) where TCFD seems to be become mandatory and climate-related KPI'S will need to be reported. Possible consequences are analysed and respectively prepared for implementation. Items in these heat maps can be flagged with E, S and G.  EEX Group, as part of Deutsche Börse Group, provides trading platform for energy and other commodities, including CO2-emission certificates plus registry services for clean energy certificates. As such, EEX Group is very much affected by the energy transition and the European Green Deal and the "Fit for 55" package of the EU Commission, affecting almost all markets at EEX Group. The regulatory outcome of all these debates would directly impact EEX Group's core activities, including clearing and settlement of all transactions. Where non-market based solutions or subsidiary schemes for green energy are chosen, EEX Group's trading volumes might be affected negatively.
Technology	Relevant, always included	Deutsche Börse considers all technology risks which could adversely affect its business continuity. New technologies could lead to new products with respective risks etc. Thus, for the energy and commodity exchanges within Deutsche Börse Group, risks related to climate-related technology is a vital part of the long-term business risk. Deutsche Börse evaluates the impact of such technological shifts when relevant, notably through scenario analysis efforts.
Legal	Relevant, always included	Adverse outcomes of legal disputes are part of the Operational Risk Framework, which also accounts for climate-related risks. We estimate that litigation risks associated with climate-related issues in Deutsche Börse Group's disclosures are limited, however incorporate these risks in our assessment. This particularly applies to the Energy Exchanges of Deutsche Börse Group. Possible consequences are analysed and respectively prepared for implementation.
Market	Not relevant, explanation provided	Deutsche Börse has very little market risk exposure that is not secured. The net market risk exposure of Deutsche Börse amounts only to 3% of the overall risk profile. Climate-related risks within this risk class are not considered to be worth mentioning.
Reputation	Relevant, always included	Reputation is one of Deutsche Börse Group's most valuable assets, key to the success of an international exchange organization and innovative market infrastructure provider and to its brand. The firm's Code of Business Conduct highlights the vital importance of protecting and advancing the Group's Reputation.  Climate change contains various reputational risks if not properly addressed, e.g. through negative stakeholder perceptions. Thus, Deutsche Börse Group's approach to climate change directly affects whether or not Deutsche Börse is listed in indices and ratings related to Environmental, Social and Governance (ESG) topics, how the company is viewed by rating & research agencies general, and whether Deutsche Börse remains a credible investment for its investors.  That's why the Group ESG Strategy department regularly reviews stakeholder expectations and concerns about these areas, including climate-related topics. We engage with a wide range of identified Stakeholder Groups and many significant external organizations via a range of means of exchange, (incl. significant meetings such as Deutsche Börse Groups AGM at which topics like climate Change were addressed). Each 3 years we are conducting a quantitative stakeholder survey (our materiality analysis).  Secondary reputational climate-related risks are implicitly considered in both OpRisk and Business Risk by triggering losses in current revenues and future EBIT, respectively.
Acute physical	Relevant, always included	Deutsche Börse has offices and data centres located around the world, and we assess risks and opportunities at the facility level to understand climate related risks including flooding, long-term temperature changes and extreme weather events. We assess our facilities ability to operate, staff access, safety and wellbeing and insurance premium impacts on both a short and long-term basis. We recognise that an effective monitoring and assessment programme must consider both the global perspective and specific local needs. Acute physical climate risks adversely affecting Deutsche Börse's business continuity and technological infrastructure (e.g. through floods) are considered in all of our climate-related risk assessments. Damage to physical assets is a risk class within OpRisk and explicitly include climate-related damages like flood damage, lightning strikes etc.
Chronic physical	Not relevant, included	Deutsche Börse has offices and data centres located around the world, and we assess risks and opportunities at the facility level to understand climate related risks including flooding, long-term temperature changes and extreme weather events. We assess our facilities ability to operate, staff access, safety and wellbeing and insurance premium impacts on both a short and long-term basis. We recognise that an effective monitoring and assessment programme must consider both the global perspective and specific local needs. As buildings and other physical assets are not located in areas where economic deterioration would have significant effects (e.g. sea level), chronic physical risks are not relevant.

**C2.3**

**(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.3a**

**(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.**

**Identifier**

Risk 1

**Where in the value chain does the risk driver occur?**

Downstream

**Risk type & Primary climate-related risk driver**

Emerging regulation	Mandates on and regulation of existing products and services
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**Primary potential financial impact**

Decreased revenues due to reduced demand for products and services

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Deutsche Börse Group holds a majority shareholding in European Energy Exchange AG (EEX), Leipzig, Germany. The product and service offerings of EEX and its subsidiaries within EEX Group focus on energy and energy related markets (e.g. power, gas, emission allowances, guarantees of origin).

EEX's business is built upon liberalized energy markets. When it comes to renewable energies, there has been a trend towards market integration at European and at the

level of the EU Member States. This contributes to the efficient functioning of markets, including those operated by EEX Group. Due to the current distressed situation on energy markets and the latest price increases some European governments call for a redesign of energy markets. If this materializes it would have consequences for EEX Group as it could reduce trading in the power markets and undermine the price signal, harming the market and EEX Group. Against the background of the European Green Deal and the new climate goal transitioning the gas and hydrogen sectors towards green and low-carbon alternatives is in the uptake. It is not yet sure if multilateral markets will develop in this area or whether longterm contracts lead to market foreclosure. All these regulatory actions can be understood as mitigation steps of climate change. The regulatory outcome of all these debates directly impact EEX Group's core activities, including clearing and settlement of all transactions. In a worst case scenario liberalisation of energy markets is reversed and renewable energy subsidised outside the markets and ramping up the production and use of green and low-carbon gases are done with little tradability. In the consequence, the need for an exchange is drastically reduced jeopardising the role of the organisation to provide market-based price building mechanisms. In a best case scenario markets are strengthened by using both competition and market mechanisms and the potential of the European internal energy market to make the implementation of the energy transition, the European Green Deal and the "Fit for 55"-package efficient from a macroeconomic perspective.

**Time horizon**

Medium-term

**Likelihood**

About as likely as not

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

9000000

**Potential financial impact figure – maximum (currency)**

27000000

**Explanation of financial impact figure**

While regulatory changes will highly impact EEX Group which had annual sales revenue of €363.15 million in 2021, the relative impact from regulatory changes related to the energy turnaround on Deutsche Börse Group with annual net revenues of €3,509 million in 2021 would only be low. Nevertheless EEX is considered a strategic investment with important growth potential for the future. Depending on the nature of the regulation, several areas of impact are possible. The spot market for power contributed 20% to the revenue of EEX in 2021. The power derivatives market was at 29%, the natural gas markets at 18% and the environmental products at 1.6%. We estimate a potential financial impact of approximate 9,000,000 EUR - 27,000,000 EUR, derived from a reduction of derivative volume. This estimate is based on professional judgment by our subject matter experts within the business.

**Cost of response to risk**

240000

**Description of response and explanation of cost calculation**

All political and regulatory risks and opportunities at EEX are closely monitored by the relevant department at both EEX and Deutsche Börse Group. Since these activities relate to the core of EEX's activities the entire organisation is involved to sustain and expand the competitive position of the organisation. More specifically, a team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. Roughly 3 FTE is dedicated to the management of this risk in a broader sense, accounting for 240,000 EUR cost of management.

**Comment**

Since these activities relate to the core of EEX's activities the entire organisation is involved to sustain and expand the competitive position of the organisation and cope with the associated risks. More specifically, a team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. Roughly 3 FTE is dedicated to the management of this risk in a broader sense accounting for 240 000 EUR cost of management.

**Identifier**

Risk 2

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Acute physical	Flood (coastal, fluvial, pluvial, groundwater)
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**Primary potential financial impact**

Increased capital expenditures

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Damage to technical/ electronical equipment and further owned facilities, cost for renovation as well as additional costs to transfer business operations to other locations or manning the backup workstations due to water inflow. The likelihood of occurrence is assumed to be once in 50 years which is based on a conservative expert estimation.

**Time horizon**

Short-term

**Likelihood**

Unlikely

**Magnitude of impact**

Low

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**



<Not Applicable>

**Potential financial impact figure – minimum (currency)**

2500000

**Potential financial impact figure – maximum (currency)**

7500000

**Explanation of financial impact figure**

Damage to technical/ electrical equipment due to water inflow (prior to insurance recovery) in company's locations in (Western) Europe: The financial impact is mainly driven by replacement costs of damaged own equipment and cost for renovation. Assumed maximum loss approx. mid 7 digit number represents the insured values of the location which is primarily faces the respective risk.

**Cost of response to risk**

35000

**Description of response and explanation of cost calculation**

- Defined and regular tested BCM-processes according to the 'Business Continuity Management Policy' of Deutsche Börse Group
- Dispersed operations, shift work and business transfer capabilities between different locations aim to ensure business continuity for vital functions, in case of staff unavailability in one location
- According to building laws dimensions of drain piping for surface water etc. are chosen in accordance to century flooding
- In principle, locations are in non flood areas

The Group has introduced and tested a management process for emergencies and crises that enables it to respond quickly and in a coordinated manner. All business segments have appointed emergency managers to act as central contacts and take responsibility during emergencies and crises. The related annual cost of management in relation to the risk Damage to technical/ electrical equipment due to water inflow (prior to insurance recovery) in company's locations in (Western) Europe are approx. mid 5 digit figure which are the aggregated personnel costs of individual corporate centers (e.g. facility management, risk management) and comprises all incidental costs that are related to the risk assessment und planning of the business continuity plan.

**Comment**

The related cost of management in relation to the risk damage to technical/ electrical equipment due to water inflow (prior to insurance recovery) in company's locations in (Western) Europe are assessed at mid 5 digit figure which are the aggregated personnel costs of individual corporate centers (e.g. facility management, risk management) and comprises all incidental costs that are related to the risk assessment und planning of the business continuity plan.

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**Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Please select

**Risk type & Primary climate-related risk driver**

Acute physical	Cyclone, hurricane, typhoon
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**Primary potential financial impact**

Increased capital expenditures

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Damage to technical/ electrical equipment and further owned facilities due to typhoon (/earthquake) in Singapore (as the main DBG location in Asia).

**Time horizon**

Long-term

**Likelihood**

More likely than not

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

50000

**Potential financial impact figure – maximum (currency)**

3500000

**Explanation of financial impact figure**

The scenario assumes damage to the office in Singapore following a natural disaster such as a typhoon or an earthquake. Assuming there would be a natural disaster of lower intensity which would not affect the entire floor, significant damage to the building is estimated as rather unlikely. In this case only some minor costs would be expected i.e. repainting the rooms and the purchase of some desks. Therefore potential loss due to damage of office equipment is assessed to be up to EUR 50k. Assuming there would be a natural disaster with a larger intensity, causing a serious damage to the entire building. In this case the building would require a larger reparation intervention and the majority of the furniture and hardware device might have to be replaced being partially or completely damaged. Considering acquisition value of furniture, telecommunication and office equipment:  
- Minimum severity: small damage up to aprox mid 5 digit figure  
- Maximum severity: app. low 7 digit figure --> office not longer usable  
So far, the Singapore office buildings have not been damaged to that extent in the past. Therefore, this scenario assumes a loss within this range with a frequency of once in 50 years for the low impact scenario and once in 250 years for the high impact scenario.

**Cost of response to risk**

20000

**Description of response and explanation of cost calculation**

Business would be transferred to other DBG locations applying the BCM (business continuity management) plans, i.e., business transfers due to workspace unavailability. We assess our facilities ability to operate, staff access, safety and wellbeing and insurance premium impacts on both a short and long-term basis. The risk of damage to technical/ electrical equipment and further owned facilities due to typhoon (/earthquake) in Singapore (as the main DBG location in Asia) could adversely affect Deutsche Börse's business continuity and technological infrastructure. As a result, Deutsche Börse Group has set up a system of emergency and disaster plans covering the entire Group (business continuity management, BCM). This covers all processes designed to ensure continuity of operations in the event of a crisis and significantly reduces availability risk. The Group has introduced and tested a management process for emergencies and crises that enables it to respond quickly and in a coordinated manner. All business segments have appointed emergency managers to act as central contacts and take responsibility during emergencies and crises. The related annual cost of management in relation to this risk is a low 5 digit figure which are the aggregated personnel costs of individual corporate centers (e.g. facility management, risk management) and comprises all incidental costs that are related to the risk assessment und planning of the business continuity plan for this scenario.

**Comment**

The related annual cost of management in relation to the risk of damage to technical/ electrical equipment and further owned facilities due to typhoon (/earthquake) in Singapore are approx. a low 5 digit figure which are the aggregated personnel costs of individual corporate centers (e.g. facility management, risk management) and comprises all incidental costs that are related to the risk assessment und planning of the business continuity plan for this scenario.

**C2.4****(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.4a****(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.****Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Downstream

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development of new products or services through R&amp;D and innovation

**Primary potential financial impact**

Increased revenues through access to new and emerging markets

**Company-specific description**

Deutsche Börse Group holds a majority shareholding in European Energy Exchange AG (EEX), Leipzig, Germany. The product and service offerings of EEX and its subsidiaries focus on energy and energy related markets (e.g. power, gas, emission allowances). By providing liquid, secure and transparent markets, EEX Group plays an important role in improving the efficient functioning of these markets that are directly linked to questions of climate change. EEX can benefit extensively from the active role it is taking in supporting the further development of Germany's and Europe's electricity market in its transition to a higher share of renewable energy and the overall increased consciousness of the necessity to stop global warming. Therefore, EEX continuously develops new products and service offerings to support the energy turnaround such as a platform for the German national emission trading system for the heating and transportation sector, products for voluntary carbon emission offsets and a new auction for green power certificates (Guarantees of Origin) through the EEX-daughter EPEX. Against the background of the European Green Deal, the climate target of the EU-Commission and the will to become independent from fossil fuels, transitioning the gas and hydrogen sectors towards green and low-carbon alternatives are uptaking and new business opportunities for EEX Group arise. All these regulatory actions can be understood as mitigation steps of climate change. The regulatory outcome directly impacts EEX Group's core activities, including clearing and settlement of all transactions. In a best case scenario markets are strengthened by using both competition and market mechanisms and the potential of the European internal energy market to make the implementation of the energy transition, the European Green Deal and the recovery from the crisis efficient from a macroeconomic perspective.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – minimum (currency)**

3000000

**Potential financial impact figure – maximum (currency)**

14000000

**Explanation of financial impact figure**

Green power is an integral part of the power spot and derivatives trading, which is why advancing market integration of renewable energy not only affects the volume of clearly differentiated environmental products of EEX (1.6% of 2021's revenue) but also the other business areas, especially power spot and derivatives trading which

together amount to 47% of 2021 revenues. Renewable Energy in power, but also in gas markets, will play an even more important role over the years to come providing business opportunities for EEX Group. Based on expert assessment and the experience with existing environmental products this could lead to a potential financial impact of 3,000,000- 14,000,000 EUR.

#### Cost to realize opportunity

240000

#### Strategy to realize opportunity and explanation of cost calculation

All political and regulatory opportunities at EEX are closely monitored by the relevant department at both EEX and Deutsche Börse Group. The main measures to benefit from opportunities from regulatory changes are to carefully plan for a new market design, products and help public authorities with services in the currently distressed energy markets as well as develop the company's strategy under consideration of these aspects. EEX advocates market-based mechanisms and consults with regulatory bodies to achieve the energy transition and strengthen the ETS. As such EEX provides concrete parameters, which could achieve market oriented solutions. In addition, EEX continuously develops new products and service offerings to support the energy turnaround such as a platform for the German national emission trading system for the heating and transportation sector, products for voluntary carbon emission offsets and a new auction for green power certificates (Guarantees of Origin) through the EEX-daughter EPEX. Existing offerings are adapted to required changes and potential new market areas are looked at. Moreover, EEX is continuously trying to expand its market reach by extending its customer base in new markets and new world regions.

Since these activities relate to the core of EEX's activities the entire organisation is involved to sustain and expand the competitive position of the organisation. More specifically, a team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. Roughly 3 FTE is dedicated to the management of this risk in a broader sense, accounting for 240,000 EUR cost of management.

#### Comment

Since these activities relate to the core of EEX's activities the entire organisation is involved to sustain and expand the competitive position of the organisation. More specifically, a team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. The related cost to realize the potential opportunity are 240,000 EUR which comprise the related personnel costs of and all incidental costs that are related to the opportunity assessment and planning.

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#### Identifier

Opp2

#### Where in the value chain does the opportunity occur?

Downstream

#### Opportunity type

Products and services

#### Primary climate-related opportunity driver

Development of new products or services through R&D and innovation

#### Primary potential financial impact

Increased revenues resulting from increased demand for products and services

#### Company-specific description

The EU ETS directive and the auctioning regulation build the core regulation for trading in emission certificates in Europe. The EU ETS reform for the fourth trading phase (2021-2030) has established a clear policy framework for the coming decade. The EU ETS will remain the key climate policy instrument in the European Union. This will positively impact EEX as an EU ETS auction platform and exchange offering secondary trading. For EEX, a well-functioning and efficient European emissions trading scheme as a climate protection instrument is the key policy instrument for advancing the energy transition at a European level. For that it needs clear framework conditions, ambitious reduction aims and the participation of as many countries and sectors as possible are necessary for the future of emissions trading as an accepted climate protection tool. In parallel, the promising developments on carbon pricing and emissions trading globally should be supported by all European political stakeholders and provides opportunities for further product development in the CO2-Certificate section of EEX. However, the concrete results of these debates are still uncertain, thus the potential financial impact on EEX is difficult to be estimated. On a further note, EEX is developing products for the so called Voluntary Carbon Market.

#### Time horizon

Medium-term

#### Likelihood

Likely

#### Magnitude of impact

Medium-low

#### Are you able to provide a potential financial impact figure?

Yes, an estimated range

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure – minimum (currency)

1600000

#### Potential financial impact figure – maximum (currency)

20000000

#### Explanation of financial impact figure

Currently emissions trading accounts for around 1.6% of 2021 revenues of EEX, which represents less than 0.1% of Deutsche Börse Group's net revenue. In the framework of its diversification strategy EEX aims for continuous growth of this segment and has already experienced this over the past three years. Thus, the potential financial impact connected with a growth of Emission trading accounts is estimated in a range between 1,600,000 – 20,000,000 EUR. This estimate is based on professional judgment by our subject matter experts within the business.

#### Cost to realize opportunity

240000

#### Strategy to realize opportunity and explanation of cost calculation

The political and regulatory developments in the energy markets are closely monitored by the relevant department at both EEX and Deutsche Börse Group. This is conducted by monitoring, membership in all relevant associations, constant contact with relevant political and regulatory stakeholders, attendance at key political events, and participation in consultations and providing advice to policy makers. To actively benefit from new developments and manage them EEX advocates market-based mechanisms and consults with regulatory bodies and positions itself as a supporter of liberalised markets. As such EEX provides concrete parameters, which could achieve market oriented solution. Further, EEX is continuously trying to expand its market reach by extending its customer base in new markets and product offering. All relevant

regulatory changes and other market parameters are continuously evaluated and considered in the overall strategy and future development of EEX. Emissions trading is considered as a key asset classes for the exchange in the future. A team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. Related cost to realize the potential opportunity are 240,000 EUR which comprises all incidental costs that are related to the opportunity assessment and planning.

#### Comment

A team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. Related cost to realize opportunity are 240,000 EUR which comprises all incidental costs that are related to the opportunity assessment and planning.

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#### Identifier

Opp3

#### Where in the value chain does the opportunity occur?

Downstream

#### Opportunity type

Products and services

#### Primary climate-related opportunity driver

Ability to diversify business activities

#### Primary potential financial impact

Increased revenues resulting from increased demand for products and services

#### Company-specific description

EEX Group has been a driver in integrating European energy markets over the past two decades. Market coupling, where EEX-Group member EPEX Spot is a key player, and governance are considered as a prerequisite for efficient energy markets which would allow amongst others for efficient integration of energy from renewable sources. This includes the grid expansion and security of supply, which should be approached from a European perspective. Large European market areas, in particular, constitute an essential precondition for the market and system integration of renewable energies since they permit a large-scale balance between generation and consumption. National "energy self-sufficiency", on the other hand, is inefficient and not mandatory for the security of supply. Also, with the aim of establishing hydrogen markets, renewable energy carriers become a global resource. On this background EEX Group has experienced – organic and inorganic - growth over the last years, and ongoing European integration of electricity markets provide for further growth opportunities. It is EEX's goal to continuously grow and strengthen its leadership position in Europe. Its goal is to continue on the same ambitious growth path as over the few years. The opportunity related to efficient integration of energy from renewable sources has an impact on EEX because green power is a steadily growing part of the power spot and derivatives trading, it not only affects the volume of clearly differentiated environmental products of EEX (1.6% of 2021's revenue) but also the other business areas, especially power spot and derivatives trading which together amount to 47% of 2021 revenues.

#### Time horizon

Short-term

#### Likelihood

Likely

#### Magnitude of impact

Medium

#### Are you able to provide a potential financial impact figure?

Yes, an estimated range

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure – minimum (currency)

100000

#### Potential financial impact figure – maximum (currency)

5000000

#### Explanation of financial impact figure

It is EEX's goal to continuously grow and strengthen its leadership position in Europe. Its goal is to continue on the same ambitious growth path as over the few years. The opportunity related to efficient integration of energy from renewable sources has an impact on EEX because green power is a steadily growing part of the power spot and derivatives trading, it not only affects the volume of clearly differentiated environmental products of EEX (1.6% of 2021's revenue) but also the other business areas, especially power spot and derivatives trading which together amount to 47% of 2021 revenues. The opportunity related to an integration of European electricity markets and large bidding zones could have a financial impact between 100,000 – 5,000,000 EUR. This estimate is based on professional judgment by our subject matter experts within the business.

#### Cost to realize opportunity

240000

#### Strategy to realize opportunity and explanation of cost calculation

The political and regulatory developments in the energy markets are closely monitored by the relevant department at both EEX and Deutsche Börse Group. This is conducted by monitoring, membership in all relevant associations, constant contact with relevant political and regulatory stakeholders, attendance at key political events, and participation in consultations and providing advice to policy makers. To actively benefit from new developments and manage them EEX advocates market-based mechanisms and consults with regulatory bodies and positions itself as a supporter of liberalised markets. As such EEX provides concrete parameters, which could achieve market oriented solution. Further EEX is continuously trying to expand its market reach by extending its customer base in new markets and product offering. All relevant regulatory changes and other market parameters are continuously evaluated and considered in the overall strategy and future development of EEX. Diversification into new market areas and regions is a key element of EEX's strategy. A team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. Related cost to realize opportunity are 240,000 EUR which and comprises all incidental costs that are related to the opportunity assessment and planning.

#### Comment

A team of 7 FTEs is involved with political and regulatory affairs and a team of 23 FTEs is involved with business development. Related cost to realize opportunity are 240,000 EUR which comprises all incidental costs that are related to the opportunity assessment and planning.

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### C3. Business Strategy

#### C3.1

**(C3.1) Does your organization’s strategy include a transition plan that aligns with a 1.5°C world?**

**Row 1**

**Transition plan**

Yes, we have a transition plan which aligns with a 1.5°C world

**Publicly available transition plan**

Yes

**Mechanism by which feedback is collected from shareholders on your transition plan**

We do not have a feedback mechanism in place, and we do not plan to introduce one within the next two years

**Description of feedback mechanism**

<Not Applicable>

**Frequency of feedback collection**

<Not Applicable>

**Attach any relevant documents which detail your transition plan (optional)**

**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

<Not Applicable>

**Explain why climate-related risks and opportunities have not influenced your strategy**

<Not Applicable>

#### C3.2

**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	Yes, qualitative and quantitative	<Not Applicable>	<Not Applicable>

#### C3.2a

**(C3.2a) Provide details of your organization’s use of climate-related scenario analysis.**

Climate-related scenario	Scenario analysis coverage	Temperature alignment of scenario	Parameters, assumptions, analytical choices
Transition scenarios Bespoke transition scenario	Business division	1.5°C	One of DBG’s entities introduced a pilot ESG Stress Test in 2021 as part of its Risk Management activities. Both physical and transition risks were implicitly included in this stress test. Following the update of the DBG Stress Testing Framework, new stress tests have been developed across the risk profile of DBG’s key banking regulated entities and these include ESG relevant risks. The upcoming plans include the development of environmental-related risk stress test(s) for DBG under the TCFD.
Physical climate scenarios Bespoke physical scenario	Business division	1.5°C	One of DBG’s entities introduced a pilot ESG Stress Test in 2021 as part of its Risk Management activities. Both physical and transition risks were implicitly included in this stress test. Following the update of the DBG Stress Testing Framework, new stress tests have been developed across the risk profile of DBG’s key banking regulated entities and these include ESG relevant risks. The upcoming plans include the development of environmental-related risk stress test(s) for DBG under the TCFD.

#### C3.2b

**(C3.2b) Provide details of the focal questions your organization seeks to address by using climate-related scenario analysis, and summarize the results with respect to these questions.**

Row 1

**Focal questions**

In order to understand if DBG's entity would be able to adapt in an efficient and timely manner to environmental, social and governance changes, Risk Management introduced an initial tactical pilot of ESG Risk Wide Stress Test. The stress test focused on natural disaster scenario in order to cover the environmental effect of climate change, as well as staff/workplace unavailability due to natural disasters. In order to understand if the entity would be able to face any sanctions related to environmental and social topic, additional buffer to a Compliance scenario has been added.

**Results of the climate-related scenario analysis with respect to the focal questions**

The impact of ESG Risk is deemed to be long-term. It should be noted that the described model has a limitation to cover short-term and it does not capture the long-term horizon. From the Regulatory and Business risks perspective, following-up with the emerging regulations, the assumptions could be adjusted. Following the update of the DBG Stress Testing Framework, new stress tests have been developed across the risk profile of DBG's key banking regulated entities and these include ESG relevant risks. The upcoming plans include the development of environmental-related risk stress test(s) for DBG under the TCFD.

C3.3

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	<p>The required transition to a climate-neutral economy creates diverse opportunities for us as a market infrastructure provider to offer products and services. At the same time, this will enable us to further diversify our product portfolio and meet our customers' growing demand for climate-related data and products. For this reason, we are developing new products and services that will further increase our net revenue and strengthen our market position. Our products and services increase market transparency and enable market participants to better evaluate and price climate opportunities and risks, which in turn has a positive impact on our net revenue and financial planning.</p> <p>Opportunities divided into Pre-Trading, Trading &amp; Clearing and Post-Trading:</p> <p>Pre-trading: Increasing market transparency; Increasing visibility and depiction of a two-degree-compatible economy through the indices</p> <p>Trading &amp; Clearing: World's leading hub for IPOs of 2-degree-compatible companies and promotion of (young) companies; Platform to transfer climate-related risks and und trade with emission allowances as well as segment for two-degree-compatible investments; Settlement of new investments of EEX through clearing houses to avoid high default risks</p> <p>Post-Trading: Through issuance into the international market (XS ISIN), international central securities depositories and custody volumes benefit indirectly from the LuxSE Green Exchange and can further increase listing venues and Xetra voluminal; EU-wide green investment fund labels and European green bond standards can both be used to capture custodial opportunities; Climate-related risks are currently documented in our operational risks, see section "Operational Risk" within chapter "Risk management" of our Combined management report. We planning to identify further climate-related risks.</p>
Supply chain and/or value chain	Yes	<p>A process-based materiality analysis is a key element of Deutsche Börse Group's sustainability strategy: in particular, this means evaluating and analysing the needs and expectations of relevant internal and external stakeholders on an ongoing basis. The process serves to determine topics of particular importance to the company's business activities or which have a significant impact on them. This, in turn, enables the Group to identify the opportunities and risks of its core business activities at an early stage and to translate them into concrete areas of entrepreneurial activity. 4 years ago, the process of identifying key areas for action was developed into a quantitative procedure in order to raise transparency. This made both concrete comparisons as well as a holistic mapping of Deutsche Börse Group's opportunity and risk profile in terms of non-financial aspects possible. Furthermore, We engage with our suppliers to understand their approach to ESG factors, including their environmental practices. With the help of this information we are able to inform and prioritise our supply chain selection, to identify potential risk and opportunities and to assess our procurement Impacts on a broader basis. As our business is based on office locations, we constantly explore the impact of climate related risks to the rest of our value chain, primarily suppliers of electronic equipment.</p> <p>Chronic physical climate-related risks have presently had a low impact on our value chain as we have been able to notify and mitigate chronic physical risks specifically at our data centres. We continue to explore the impact on our other value chain partners, but we anticipate this impact is also low. We focus on strategic and high value suppliers as our main priority, due to the scope and scale of their environmental impacts and the level of engagement we have with them.</p>
Investment in R&D	Yes	<p>Climate related risks and opportunities, notably Market, Reputational and Regulation risk and opportunity types have impacted on our investment and topics of focus in our R&amp;D efforts. As a result of identifying a risk in changing customer behaviours the Group has invested in R&amp;D in its index business area, to develop methodologies supporting new climate related indexes. Due to the structural changes in the sector we are continuously monitoring in close combination with our user base the development of new indices. We consider the magnitude of these opportunities and associated impacts to be medium-high.</p>
Operations	Yes	<p>Introducing new offerings for our customers has operational impact such as the computation and maintenance of this offering. As awareness of the challenges of climate change has grown, greenhouse gas emissions and the careful handling of resources have become the focus of our environmental management system. Deutsche Börse Group has also made environmental issues an integral part of its sustainability activities and developed a climate strategy which includes having net zero emissions in 2025. Deutsche Börse Group is adopting a holistic approach of resource-saving business ecology. Within our Group-wide initiatives, we focus on avoiding or reducing greenhouse gas emissions. Moreover, we already decided to set our business carbon neutral by buying gold standard climate certificates. Within our Group-wide initiatives, we focus on reducing greenhouse gas emissions, water and paper consumption as well as waste to minimise our ecological footprint. These initiatives include:</p> <ul style="list-style-type: none"> <li>- using shuttle buses between the locations Eschborn and Luxembourg to cut down on individual trips</li> <li>- offering job tickets for local public transport to staff in Frankfurt/Eschborn</li> <li>- more frequent use of video conferences instead of business travel to reduce emissions</li> <li>- using double-sided printing as the default printer setting</li> <li>- reducing the number of printed publications</li> <li>- sending letters and parcels at the Frankfurt/Eschborn site and parcels at the Luxembourg site via the "Go Green" initiative of Deutsche Post and DHL</li> <li>- purchasing sustainably generated hydroelectricity to run Group-wide servers at the EQUINIX data centre in Frankfurt/Bergen-Enkheim</li> </ul>

C3.4

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Revenues Direct costs Indirect costs Acquisitions and divestments	<p>New climate related product and services are already generating revenues and Deutsche Börse steadily identifies opportunities to expand these in its financial planning processes. In 2021, the share of revenue that is related to ESG - the so called ESG net revenue - already reached 7%. The publicly communicated annual target growth rate of the ESG net revenue is 10%. In 2021, this target was overachieved as the ESG net revenue grew by 210% due to finalizing the acquisition of Institutional Shareholder Services Inc. (ISS). We consider the magnitude of these impacts to be medium-high.</p> <p>Deutsche Börse Group expects to continuously identify, assess and execute organic and inorganic opportunities that strengthen our existing business, or generate new opportunities in complementary areas, e.g. regarding the Group's climate-related product portfolio in the next 5 years.</p> <p>Climate-related risks and opportunities are considered in planning for operating costs. Especially those arising from impacts to energy, water and business travel. Deutsche Börse has in place an environmental management system and planning processes to identify opportunities to reduce its climate-related impacts and profit from subsequent cost savings with a 2-5 year time horizon (e.g. with respect to energy or water Efficiency). We consider the magnitude of these impacts to be low.</p> <p>On a Deutsche-Börse-Group level, identified climate related risks impact the financial planning process only implicitly. The only climate-related risks that affect the required economic capital are natural disasters that pose a threat to the availability of Deutsche Börse Group's core systems with a short term time horizon. This particular root cause for such an event is, however, very small.</p>

**C3.5**

**(C3.5) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's transition to a 1.5°C world?**

Yes

**C3.5a**

**(C3.5a) Quantify the percentage share of your spending/revenue that is aligned with your organization's transition to a 1.5°C world.**

**Financial Metric**

Revenue

**Percentage share of selected financial metric aligned with a 1.5°C world in the reporting year (%)**

7

**Percentage share of selected financial metric planned to align with a 1.5°C world in 2025 (%)**

10.25

**Percentage share of selected financial metric planned to align with a 1.5°C world in 2030 (%)**

16.5

**Describe the methodology used to identify spending/revenue that is aligned with a 1.5°C world**

The EU Taxonomy does not apply directly to our business model and is therefore not suitable as a reference framework for classifying our products and services in terms of sustainability. We therefore devised our own definition of ESG net revenue in the course of a strategic dialogue. Since the beginning of the year, we have been explicitly measuring our ESG net revenue according to this definition, which we describe in more detail below. The products and services of our respective segments generate economic value in different areas of the financial sector and the real economy and are often not comparable. From a Group perspective, this requires a wide-ranging definition of ESG net revenue, which then has to be broken down into more detail at the segment level. From the Group perspective, net revenue is deemed to be ESG net revenue if the products concerned are related to the transformation of the real and/or financial economy in terms of environmental, social and governance aspects. This relationship exists if our products can increase the general transparency of information in terms of the three ESG dimensions – not only for investors, founders, asset managers and market participants, but also for external observers:

Environmental: This particularly comprises compliance with climate targets, regulatory requirements and environmental standards and/or credible commitments.

Social: This particularly includes compliance with labour law in all regions and operations, equal opportunities for all employees and minimum standards for suppliers.

Corporate governance: This particularly includes minimum standards for the transparency of internal processes and control mechanisms.

Each operating segment in Deutsche Börse Group can increase its information transparency in these three dimensions by including ESG aspects in its product portfolio – be it by integrating ESG ratings, data and/or analysis, or by reporting data on trading volumes for securities, derivatives, renewable energies and/or commodities. Our product portfolio can increase information transparency specifically by providing generally accepted indicators as market signals.

**C4. Targets and performance**

**C4.1**

**(C4.1) Did you have an emissions target that was active in the reporting year?**

Absolute target

**C4.1a**

**(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.**

Target reference number

Abs 1

**Year target was set**

2020

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

Scope 3

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

Category 6: Business travel

**Base year**

2019

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

5831

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

2217

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

5112

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

13160

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

44.4

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

16.8

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

38.8

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**Target year**

2025

**Targeted reduction from base year (%)**

100

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

0

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1063.6

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

2924.5

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

1988.8

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

5976.9

**% of target achieved relative to base year [auto-calculated]**

54.5828267477204

**Target status in reporting year**

Underway

**Is this a science-based target?**

Yes, we consider this a science-based target, and the target is currently being reviewed by the Science Based Targets initiative

**Target ambition**

Well-below 2°C aligned

**Please explain target coverage and identify any exclusions**

The target covers all scope 1 and 2 GHG emissions as well as all scope 3 emissions from business travel. All emissions that are measured are part of the reduction target.

**Plan for achieving target, and progress made to the end of the reporting year**

In a first step, CO2 emissions per working place are expected to be cut by 50 per cent until 2021 to the year 2019, with direct measures that help to prevent CO2 emissions. Those will include a switch in the energy supply of office buildings towards renewable energies, the carbon neutralisation of business trips as well as an advanced infrastructure for e-mobility on-site.

In a second step, these measures will be further enhanced to reduce emissions by another 20 percentage points by 2023.

In a third step, the remaining 30 per cent base of annual emissions will be offset by real compensation of emissions from 2025 onwards with external projects e.g. through afforestation.



**List the emissions reduction initiatives which contributed most to achieving this target**

<Not Applicable>

---

**Target reference number**

Abs 2

**Year target was set**

2020

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

Scope 3

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

Category 6: Business travel

**Base year**

2019

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

5831

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

2217

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

5112

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

13160

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

44.4

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

16.8

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

38.8

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**Target year**

2021

**Targeted reduction from base year (%)**

50

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

6580

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1063.6

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

2924.5

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

1988.8

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

5976.9

**% of target achieved relative to base year [auto-calculated]**

109.165653495441

**Target status in reporting year**

Achieved

**Is this a science-based target?**

Yes, we consider this a science-based target, and the target is currently being reviewed by the Science Based Targets initiative

**Target ambition**

Well-below 2°C aligned

**Please explain target coverage and identify any exclusions**

The target covers all scope 1 and 2 GHG emissions as well as all scope 3 emissions from business travel. All emissions that are measured are part of the reduction target.

In a first step, CO2 emissions per working place are expected to be cut by 50 per cent until 2021 to the year 2019, with direct measures that help to prevent CO2 emissions. Those will include a switch in the energy supply of office buildings towards renewable energies, the carbon neutralisation of business trips as well as an advanced infrastructure for e-mobility on-site.

**Plan for achieving target, and progress made to the end of the reporting year**

<Not Applicable>

**List the emissions reduction initiatives which contributed most to achieving this target**

Switch in the energy supply of office buildings towards renewable energies, carbon neutralisation of business trips, advanced infrastructure for e-mobility on-site.

---

**Target reference number**

Abs 3

**Year target was set**

2020

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

Scope 3

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

Category 6: Business travel

**Base year**

2019

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

5831

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

2217

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

5112

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

13160

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

44.4

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

16.8

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

38.8

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**Target year**

2023

**Targeted reduction from base year (%)**

70

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

3948

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1063.6

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

2924.5

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

1988.8

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

5976.9

**% of target achieved relative to base year [auto-calculated]**

77.9754667824577

**Target status in reporting year**

Underway

**Is this a science-based target?**

Yes, we consider this a science-based target, and the target is currently being reviewed by the Science Based Targets initiative

**Target ambition**

Well-below 2°C aligned

**Please explain target coverage and identify any exclusions**

The target covers all scope 1 and 2 GHG emissions as well as all scope 3 emissions from business travel. All emissions that are measured are part of the reduction target.

**Plan for achieving target, and progress made to the end of the reporting year**

In a first step, CO2 emissions per working place are expected to be cut by 50 per cent until 2021 to the year 2019, with direct measures that help to prevent CO2 emissions. Those will include a switch in the energy supply of office buildings towards renewable energies, the carbon neutralisation of business trips as well as an

advanced infrastructure for e-mobility on-site.

In a second step, these measures will be further enhanced to reduce emissions by another 20 percentage points by 2023.

Emissions reduction initiatives: Switch in the energy supply of office buildings towards renewable energies, carbon neutralisation of business trips, advanced infrastructure for e-mobility on-site.

**List the emissions reduction initiatives which contributed most to achieving this target**

<Not Applicable>

**C4.2**

**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

No other climate-related targets

**C4.3**

**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Yes

**C4.3a**

**(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	1	0
To be implemented*	3	7160
Implementation commenced*	1	0
Implemented*	3	931
Not to be implemented	0	0

**C4.3b**

**(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.**

**Initiative category & Initiative type**

Energy efficiency in buildings	Lighting
--------------------------------	----------

**Estimated annual CO2e savings (metric tonnes CO2e)**

0

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

2500

**Investment required (unit currency – as specified in C0.4)**

30000

**Payback period**

11-15 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

Due to the use of green energy a CO2 saving can not be realised

**Initiative category & Initiative type**

Transportation	Employee commuting
----------------	--------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

111

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 7: Employee commuting

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

0

**Investment required (unit currency – as specified in C0.4)**

0

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

Using shuttle buses between the Eschborn and Luxembourg sites to cut down on individual trips. Before Covid, the shuttle ran 4 times a week (Mon to Thurs) on both routes: Lux - Frankfurt (morning and evening) and Frankfurt - Lux (morning and evening). Reduction of 111 tonnes in 2021 due to the particular shutdown of shuttle service due to Covid-19 pandemic and the related home office obligation.

**Initiative category & Initiative type**

Transportation	Other, please specify (Avoid car use by providing Job Tickets for Deutsche Börse Group's employees)
----------------	---

**Estimated annual CO2e savings (metric tonnes CO2e)**

345

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 7: Employee commuting

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

0

**Investment required (unit currency – as specified in C0.4)**

0

**Payback period**

&lt;1 year

**Estimated lifetime of the initiative**

Ongoing

**Comment**

The calculation based on the numbers of employees that had a job ticket in 2021. CO2 Emission is set to 141gr/CO2/km while the public transport is calculated as 1/4 of the emissions. Basis is moreover the working days in 2021 (due to Covid19 home office obligations, the assumption is an average of 2 office days/week) and an average commuting distance of 2 x 10km per working day.

**Initiative category & Initiative type**

Other, please specify	Other, please specify (Process optimization - Sending letters and parcels at the Frankfurt/Eschborn site and parcels at the Luxembourg site via the "Go Green" initiative of Deutsche Post and DHL)
-----------------------	---

**Estimated annual CO2e savings (metric tonnes CO2e)**

9

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

0

**Investment required (unit currency – as specified in C0.4)**

0

**Payback period**

No payback

**Estimated lifetime of the initiative**

Ongoing

**Comment**

As part of the GoGreen offering, Deutsche Post measures the CO2 emissions produced during transport and handling of shipments and balances them by providing corresponding financial support for climate protection projects. This enables us to offset the effects.

C4.3c

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Dedicated budget for energy efficiency	Deutsche Börse Group continuously investigates energy efficiency optimisation potentials and pays a premium for purchase of renewable energy.
Employee engagement	Deutsche Börse Group continuously engages employees to save energy and to identify further potentials through innovation.
Dedicated budget for low-carbon product R&D	Especially EEX continuously develops new products supporting a low carbon energy supply.

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?

Yes

C4.5a

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products.

**Level of aggregation**

Group of products or services

**Taxonomy used to classify product(s) or service(s) as low-carbon**

Other, please specify (Qontigo uses CDP and ISS ESG as reliable and professional data sources for the estimated and reported data used to calculate all STOXX Low Carbon Indices)

**Type of product(s) or service(s)**

Other	Other, please specify (Low Carbon Index)
-------	--

**Description of product(s) or service(s)**

The Qontigo Low Carbon index family is designed to enable investors to decarbonize their portfolios while participating in the low-carbon economic growth. The STOXX Low Carbon index family is derived from STOXX Global 1800 Index and its regional subsets. STOXX Climate Benchmark Indices are designed to facilitate the shift towards a low-carbon economy and align investments with the Paris Climate Agreement. STOXX Paris Aligned Benchmark Indices (PABs) – These indices incorporate carbon emission limitations in stock selection, in line with the global warming target of the Paris Climate Agreement<sup>2</sup>. They aim for 60% greenhouse gas (GHG) intensity reduction. STOXX Climate Transition Benchmark Indices (CTBs) – These indices allow for more sectorial diversification and help investors adopt a portfolio decarbonization trajectory. They aim for 40% greenhouse gas (GHG) intensity reduction. Eurex offers futures on EURO STOXX 50 Low Carbon and STOXX Europe Climate Impact indices for trading.

**Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

No

**Methodology used to calculate avoided emissions**

<Not Applicable>

**Life cycle stage(s) covered for the low-carbon product(s) or services(s)**

<Not Applicable>

**Functional unit used**

<Not Applicable>

**Reference product/service or baseline scenario used**

<Not Applicable>

**Life cycle stage(s) covered for the reference product/service or baseline scenario**

<Not Applicable>

**Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario**

<Not Applicable>

**Explain your calculation of avoided emissions, including any assumptions**

<Not Applicable>

**Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year**

0.1

**Level of aggregation**

Group of products or services

**Taxonomy used to classify product(s) or service(s) as low-carbon**

Other, please specify (Please see description below)

**Type of product(s) or service(s)**

Other	Other, please specify (Power markets - Renewable energy products and CO2-emission certificates)
-------	---

**Description of product(s) or service(s)**

At EEX Group products fit for renewable energies are being developed. Renewable energies make up an ever increasing share of physical and financial power markets, however dependent of the actual market area. In Germany, renewable energy made up more than 50 % of the actual power production. However, as renewable energy is integral part of power markets it is not possible to name the revenue share stemming from them. Also, EEX is constantly working on its offering in CO2-emission certificates. Environmental products contributed to around 1% of EEX's revenues in 2021.

**Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

No

**Methodology used to calculate avoided emissions**

<Not Applicable>

**Life cycle stage(s) covered for the low-carbon product(s) or services(s)**

<Not Applicable>

**Functional unit used**

<Not Applicable>

**Reference product/service or baseline scenario used**

<Not Applicable>

**Life cycle stage(s) covered for the reference product/service or baseline scenario**

<Not Applicable>

**Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario**

<Not Applicable>

**Explain your calculation of avoided emissions, including any assumptions**

<Not Applicable>

**Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year**

0.1

C5. Emissions methodology

C5.1

**(C5.1) Is this your first year of reporting emissions data to CDP?**

No

C5.1a

**(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?**

**Row 1**

**Has there been a structural change?**

Yes, an acquisition

**Name of organization(s) acquired, divested from, or merged with**

Acquisition Institutional Shareholder Services Inc.

**Details of structural change(s), including completion dates**

The acquisition of ISS Inc. was completed in February 2021.

C5.1b

**(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?**

	Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	No	<Not Applicable>

C5.1c

**(C5.1c) Have your organization's base year emissions been recalculated as result of the changes or errors reported in C5.1a and C5.1b?**

	Base year recalculation	Base year emissions recalculation policy, including significance threshold
Row 1	No, because the operations acquired or divested did not exist in the base year	

**(C5.2) Provide your base year and base year emissions.****Scope 1****Base year start**

January 1 2016

**Base year end**

December 31 2016

**Base year emissions (metric tons CO2e)**

2878

**Comment**

It is difficult to produce a Group-wide consolidation of environmental data and a detailed breakdown at this time due to capacity-related and technical reasons. This can be explained primarily with regard to the materiality assessment, which suggests other priorities with a view to the value chain of a financial services provider. Nevertheless, we aim to further increase our transparency and informational content. To this end, in 2016 we expanded the internal capture of environmental data to include a number of additional locations. For quality assurance reasons, these new data will only be included in our external reporting in the 2021 reporting period, following careful consolidation.

**Scope 2 (location-based)****Base year start**

January 1 2016

**Base year end**

December 31 2016

**Base year emissions (metric tons CO2e)**

21968

**Comment**

Where available market-based data is used. Only for a few facilities, we are dependent on location-based data. Therefore, a split of data sources is not made. Nonetheless, we are continuously working on an improvement of data quality and consistency.

**Scope 2 (market-based)****Base year start**

January 1 2016

**Base year end**

December 31 2016

**Base year emissions (metric tons CO2e)**

1754

**Comment**

Where available market-based data is used. Only for a few facilities, we are dependent on location-based data. Therefore, a split of data sources is not made. Nonetheless, we are continuously working on an improvement of data quality and consistency.

**Scope 3 category 1: Purchased goods and services****Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment****Scope 3 category 2: Capital goods****Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment****Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)****Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment****Scope 3 category 4: Upstream transportation and distribution****Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment**

**Scope 3 category 5: Waste generated in operations**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 6: Business travel**

**Base year start**

January 1 2016

**Base year end**

December 31 2016

**Base year emissions (metric tons CO2e)**

6134

**Comment**

Business Travel are considered as Scope 3 emissions.

**Scope 3 category 7: Employee commuting**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 8: Upstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 9: Downstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 10: Processing of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 11: Use of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 12: End of life treatment of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 13: Downstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**



**Scope 3 category 14: Franchises**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 15: Investments**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (upstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (downstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**C5.3**

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**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

**C6. Emissions data**

---

**C6.1**

---

**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

**Reporting year**

**Gross global Scope 1 emissions (metric tons CO2e)**

1063.579

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

**C6.2**

---

**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

**Row 1**

**Scope 2, location-based**

We are not reporting a Scope 2, location-based figure

**Scope 2, market-based**

We are reporting a Scope 2, market-based figure

**Comment**

Where available market-based data is used. Only for a few facilities, we are dependent on location-based data. Therefore, a split of data sources is not made. Nonetheless, we are continuously working on an improvement of data quality and consistency.

## C6.3

---

**(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?**

**Reporting year**

**Scope 2, location-based**

<Not Applicable>

**Scope 2, market-based (if applicable)**

2924.5

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

## C6.4

---

**(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?**

No

## C6.5

---

**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

**Purchased goods and services**

**Evaluation status**

Not relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

22.3

**Emissions calculation methodology**

Other, please specify (Recycled paper is accounted for at an emissions factor of 0.99 kg CO2 / kg paper.)

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

0

**Please explain**

Deutsche Börse Group is a service provider. Its core activities concentrate on designing, developing and operating software systems and related services. CO2 emissions from employment of external staff as purchase of services is included in CO2 emissions from operations i.e. Scope 2 emissions. Nevertheless, office supplies are of course used. CO2 emissions from the production of 22.3 tonnes of recycled paper (Deutsche Börse Group's paper consumption 2021) amount to 22.3 tonnes

**Capital goods**

**Evaluation status**

Relevant, not yet calculated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

Discussions with the purchasing department are still taking place to evaluate emissions from capital goods mainly the purchase of computers and servers. Our evaluation is not complete yet

**Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

All of our relevant fuel-and-energy-related activities are included in our Scope 1 and 2 emissions.

## Upstream transportation and distribution

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

As service provider of financial markets services upstream transportation and distribution are not relevant for the Group's core business activities.

## Waste generated in operations

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

The main waste generated from services provided by Deutsche Börse Group is waste from office activities - mainly paper, organic waste from the company's canteens and other waste. The total amount of generated waste amounts to 857.25 t. Deutsche Börse Group is strongly ambitious to further reduce its waste in the future.

## Business travel

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

1988.8

### Emissions calculation methodology

Other, please specify (Includes: - total flight km in 2021 weighted with the DEFRA factor - company cars)

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### Please explain

Business travel emissions are calculated out of total flight km in 2021 weighted with the DEFRA factor and company cars. Air travel forms the most significant aspect of our business travel footprint. The total number of flight lead to 655.2 tonnes of CO2 emissions. Company cars accounted for 1,333.6 tonnes CO2.

## Employee commuting

### Evaluation status

Relevant, not yet calculated

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

We are reviewing the potential of undertaking a travel plan for our global offices to understand our employee commuting footprint and any potential methods to influence or reduce this footprint. The central city location of most of our offices means the majority of our commuting footprint is likely to be public transport based

## Upstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

There are no relevant upstream leased assets within the Group

#### Downstream transportation and distribution

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

There is no relevant downstream transportation and distribution.

#### Processing of sold products

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

Most services of Deutsche Börse Group are provided electronically to market participants and do not require end-of-life treatment

#### Use of sold products

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

Most services of Deutsche Börse Group are provided electronically to market participants and do not require end-of-life treatment

#### End of life treatment of sold products

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

Most services of Deutsche Börse Group are provided electronically to market participants and do not require end-of-life treatment

#### Downstream leased assets

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

There are no relevant downstream leased assets within Deutsche Börse Group.

## Franchises

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

There are no franchise activities within Deutsche Börse Group.

## Investments

### Evaluation status

Relevant, not yet calculated

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Most investments of Deutsche Börse Group were made in intangible assets of financial investments. This category will be calculated in the next year due to the SBTi validation project.

## Other (upstream)

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

There are no such activities within Deutsche Börse Group.

## Other (downstream)

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

There are no such activities within Deutsche Börse Group.

## C6.7

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### (C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

## C6.10

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(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

**Intensity figure**

0.000001093

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

3836

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

3509500000

**Scope 2 figure used**

Market-based

**% change from previous year**

47.85

**Direction of change**

Decreased

**Reason for change**

Emission reduction initiatives, as well as the global Covid pandemic, leading to lower emissions e.g. due to home office obligations (especially drop down in Scope 1 emissions).

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**Intensity figure**

0.43320158

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

3836

**Metric denominator**

full time equivalent (FTE) employee

**Metric denominator: Unit total**

8855

**Scope 2 figure used**

Market-based

**% change from previous year**

57.94

**Direction of change**

Decreased

**Reason for change**

Emission reduction initiatives, as well as the global Covid-19 pandemic, leading to lower emissions e.g. due to home office obligations (especially drop down in Scope 1 emissions)

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## C7. Emissions breakdowns

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### C7.1

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(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?

No

### C7.2

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**(C7.2) Break down your total gross global Scope 1 emissions by country/region.**

Country/Region	Scope 1 emissions (metric tons CO2e)
Germany	929.7
Ireland	0
Switzerland	25.18
United Kingdom of Great Britain and Northern Ireland	4.56
France	4.05
Netherlands	0
United States of America	79.98
China	12.28
Czechia	0.01
Singapore	0.31
Belgium	0
Argentina	0
Brazil	0.63
Canada	0
Mexico	0.31
Australia	1.26
India	0.94
Japan	0.63
Malaysia	0.31
Philippines	0
United Arab Emirates	0.63
Austria	0.62
Denmark	0.31
Finland	0
Italy	0.62
Luxembourg	0.31
Poland	0.31
Spain	0.62
Sweden	0

**C7.3**

**(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.**

By facility

**C7.3b**

**(C7.3b) Break down your total gross global Scope 1 emissions by business facility.**

Facility	Scope 1 emissions (metric tons CO2e)	Latitude	Longitude
Ann Arbor (312 South State Street, Ann Arbor, MI 48104)	0	42.27896	-83.74438
Atlanta (400 Northridge Road Suite 550, GA 30350)	10.08	33.980717	-84.347963
Boston (75 Federal Street 12th Floor, Suite 1205 Boston, MA 02110)	0	42.355272	71.056863
Chapel Hill, 1280 Environ Way	1.26	35.9073	-79.021972
233 South Wacker Drive (Willis Tower 233 South Wacker Drive Suite 2455 Chicago, IL 60606)	0	41.879023	-87.635042
West Madasin (200 West Madison, Suite 775, Chicago, Illinois 60606)	0	41.882367	-87.634457
1177 Avenue of the America, 4th Floor, New York, NY 10036	0	40.757492	-73.982911
1155 Avenue of the Americas Floor 19 New York, NY 10036	0	40.75682	-73.982659
17 State Street, Suite 2700 New York	37.78	40.703075	-74.013973
521 Fifth Avenue 38th Floor New York, NY 10175 USA	0	40.754338	-73.979776
Norman (1 Partners Place 350 David L. Boren Blvd., Suite 2000 Norman, OK 73072)	0	35.182687	-97.43694
Menlo Park (101 Jefferson Drive #117 Menlo Park, CA 94025)	1.26	37.483476	-122.174436
201 California Street, Suite 610 San Francisco	0	37.79317	-122.39904
201 Mission Street, Suite #2150 San Francisco	0	37.791127	-122.394715
Rockville (702 King Farm Boulevard Rockville, MD 20850)	0	39.111377	-77.177902
San Diego (4250 Executive Sq, Suite 600, La Jolla CA 92037)	0	32.874863	-117.214944
Washington (1921 Gallows Road, 3rd Floor Tysons	28.34	38.91313	-77.227334
Buenos Aires (Corrientes Avenue 800, 33rd Floor Office 101 Buenos Aires, C1008 CABA, Argentina)	0	-34.603567	-58.377891
Sao Paolo	0.63	-23.5489	-46.6388
Toronto (400 University Avenue Suite 1620	0	43.653616	-79.38834
Mexiko City	0.31	19.380002	-99.134007
Canberra (Level 5, 131 City Walk Canberra ACT 2601)	0	-35.278168	149.13095
Melbourne (217 Blackburn Road Mount Waiverley VIC 3149)	0	-37.874314	145.147532
Pitt Street (Suite 102, Level 1, 56 Pitt Street, Sydney NSW 2000 Australia)	0	-33.863604	151.209143
9 Castlereagh Street, Level 17 Sydney	0.31	-33.866503	151.209658

Facility	Scope 1 emissions (metric tons CO2e)	Latitude	Longitude
7/55 Clarence St, Sydney NSW 2000	0	-33.864688	151.20438
52 Martin Place Sydney	0.94	-33.86721	151.210849
Bligh Street (Level 3 1 Bligh Street Sydney, NSW)	0	-33.86471	151.210635
Beijing (Unit 01-03, 23th Floor, China World Tower)	1.89	39.909741	116.458773
2904-7, 29/F, Man Yee Building 68 Des Voeux Road	0	22.283851	114.157169
14th Floor, Spaces Sun House 90 Connaught Road Central Sheung Wan Hong Kong Island	0	22.286408	114.154074
28/F LHT Tower 31 Queen's Road Central Hong	10.39	22.282436	114.156623
Chennai	0	13.08268	80.270718
Western Express Hwy (7th & 8th Floor, Central Wing, Nesco IT 4, Western Express Highway, Goregaon East, Mumbai 400063 India)	0	19.15291	72.85481
Suite 9, Vatika Business Centre Trade Centre, Bandra Kurla Complex, Bandra East, Mumbai – 400 051, India	0.944	19.073086	72.871005
Marunouchi Kitaguchi Building, Floor 27, 1-6-5 Marunouchi Chiyoda-ku Tokyo 100-0005, Japan	0	35.684212	139.766877
Sumitomo Fudosan Kanda Building 16F 7 Kanda	0	35.693401	139.765351
Tekko Building 4F 1-8-2 Marunouchi, Chiyoda-ku Tokyo 100-0005	0.629	35.683322	139.770261
Kuala Lumpur	0.314	3.13829	101.687
Manila Solaris (15F Solaris One Building, 130 Dela Rosa Street., Legaspi Village, Makati City 1229 Philippines)	0	14.558355	121.017033
Manila Ayala North Exchange (12F Ayala North Exchange Tower 2, 6796 Ayala Avenue, Legaspi Village Makati City 1229 Philippines)	0	14.560114	121.015671
103 Penang Road Unit 11-07 Visioncrest	0	1.299105	103.843441
80 Robinson Road, #02-00 Singapore 068898, Singapore	0.31	1.280419	103.849278
#06-01 to 02 Ocean Financial Centre 10 Collyer Quay Singapore	0	1.283497	103.851957
9 Raffles Place, #56-01 Republic Plaza Tower 1 Singapore 048619	0	1.283769	103.850971
Conrad Tower Building Level 10, Unit 1006 Sheikh Zayed Road P.O. Box 27250 Dubai	0	25.225847	55.28408
Liberty House Level 8, App.810 P.O. Box: 482036 Dubai	0.629	25.205563	55.27265
Mayerhofgasse 1/19, 1040 Vienna	0.62	48.192956	16.370315
Chaussée de la Hulpe 166, 1170 Brussels	0	50.79657	4.405108
Square de Meeus 5-6, 1000 Brussels	0	50.85045	4.34878
Futurama Business Park Building E, Sokolovska 662/136b Prague	0	50.096328	14.464151
Futurama Business Park, Building B Prague	0	50.096368	14.463743
Rybna 14, Praha 1, 110 05 Prague	0.01	50.089526	14.426205
Copenhagen (Majsmarken 1 9500 Hobro Denmark)	0.311	56.6545	9.795147
1 London Bridge (4th & 5th Floor, West Building 1 London Bridge, London SE1 9BG, United Kingdom)	0	51.506695	-0.087504
11 Westferry Circus Canary Wharf London E14 4HE,	4.555	51.505801	-0.026304
Tunbridge Wells	0	51.133941	0.261985
Wokingham (Suite A, Ground Floor, Trinity Court Molly Millars Lane Wokingham RG412PY)	0	51.404498	-0.844513
Grexel Systems Ltd. Lautatarhankatu 6 FI-00580 Helsinki	0	60.189107	24.970214
Rue de Surène 17 75008 Paris	0	48.870924	2.320685
5 Boulevard Montmartre, 75002 Paris	0	48.87149	2.342553
19, Boulevard Malesherbes, 75008 Paris	4.047	48.872171	2.321424
5 Rue du Renard, 75004 Paris	0	48.858204	2.351559
Kurfürstendamm 119 Berlin	1.868	52.496997	13.287961
Unter den Linden 38 Berlin	0	52.51732	13.387513
Marburger Straße 17 Berlin	0	52.503214	13.337496
The Cube (Mergenthalerallee 61 65760 Eschborn, Germany)	892.748	50.13549	8.56968
Mergenthalerallee 71-73, 65760 Eschborn	0	50.135628	8.571417
Rechenzentrum Hausen Frankfurt	30.098	50.134947	8.627002
Börsenplatz 4 Frankfurt	0	50.115232	8.678161
Poststelle Frankfurt	3.113	50.115232	8.678161
Friesstraße (Rechenzentrum, Bergen Enkheim Frankfurt)	1.868	50.140657	8.739576
Grüneburgweg 16-18 / Westend Carrée 60322 Frankfurt am Main	0	50.121533	8.672328
Frankfurt, Mainzer Landstr. 41	0	50.111005	8.66471
Haar (Münchener Straße 14 85540 Haar)	0	48.108433	11.722819
Augustplatz 9 Leipzig	0	51.338057	12.379815
Torgauer Str. 231 Leipzig	0	51.362753	12.446543
Munich (Goethestr, 28 D-80336 Munich)	0	48.13629	11.558362
Cork - Irland (NSQ1 Navigation Square, Albert Quay East, Cork Ireland)	0	51.898238	-8.461317
Milan (Via Santa Maria Valle 3 (Regus Carrobbio) 20123 Milan, IT)	0.623	45.460531	9.184109
42 Avenue JF Kennedy, L-1855 Luxembourg	0	49.631305	6.17054
Rue Edward Steichen 22 Luxembourg	0	49.630854	6.171761
The Square 42 Avenue JF Kennedy L-1855	0.311	49.631375	6.171237
Amsterdam (Quarter Plaza Transformatorweg 90 1014 AK Amsterdam The Netherlands)	0	52.392995	4.847723
Warsaw (Sp. z.o.o. ALEJA JANA PAWŁA II 80 / 39 00-175 WARSAW, POLAND)	0.311	52.255838	20.984133
Torre Europa, Paseo de la Castellana 95-15ª, 28046 Madrid	0.622	40.451805	-3.691634
Stockholm (Fleminggatan 7 5th Floor 112 26 Stockholm)	0	59.332505	18.047688
Bern (Marktgasse 20 3011 Bern)	0	46.948281	7.446994
Zug Theilerstrasse 1A	24.007	47.179537	8.514997
Limmatquai 72 (2nd floor) / 8001 Zurich	1.171	47.37328	8.542829
Bleicherweg 10, 8002 Zurich	0	47.368738	8.536983
Hardstrasse 201, 8005 Zurich	0	47.386277	8.517252



## C7.5

### (C7.5) Break down your total gross global Scope 2 emissions by country/region.

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
United States of America	0	1003.558
Argentina	0	362.701
Brazil	0	0.705
Canada	0	16.6
Mexico	0	0.96
Australia	0	6.53
China	0	65.3
India	0	210.12
Japan	0	36.73
Malaysia	0	1.41
Philippines	0	183.66
Singapore	0	40.97
United Arab Emirates	0	1.79
Austria	0	1.09
Belgium	0	25.2
Czechia	0	196.87
Denmark	0	0.47
United Kingdom of Great Britain and Northern Ireland	0	244.14
Finland	0	4.21
France	0	6.39
Germany	0	315.16
Ireland	0	0
Italy	0	1.34
Luxembourg	0	146.02
Netherlands	0	18.94
Poland	0	1.68
Spain	0	1.07
Sweden	0	24.06
Switzerland	0	6.75

## C7.6

### (C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By facility

### C7.6b

#### (C7.6b) Break down your total gross global Scope 2 emissions by business facility.

Facility	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Ann Arbor (312 South State Street, Ann Arbor, MI 48104)	0	10.081
Atlanta (400 Northridge Road Suite 550, GA 30350)	0	27.037
Boston (75 Federal Street 12th Floor, Suite 1205 Boston, MA 02110)	0	26.423
Chapel Hill, 1280 Environ Way	0	3.379
233 South Wacker Drive (Willis Tower 233 South Wacker Drive Suite 2455 Chicago, IL 60606)	0	96.595
West Madasin (200 West Madison, Suite 775, Chicago, Illinois 60606)	0	5.577
1 South Wacker Drive, Suite 200 Chicago, IL 60606	0	3.379
1177 Avenue of the America, 4th Floor, New York, NY 10036	0	38.132
1155 Avenue of the Americas Floor 19 New York, NY 10036	0	41.63
17 State Street, Suite 2700 New York	0	101.391
521 Fifth Avenue 38th Floor New York, NY 10175 USA	0	35.583
Norman (1 Partners Place 350 David L. Boren Blvd., Suite 2000 Norman, OK 73072)	0	139.413
Menlo Park (101 Jefferson Drive #117 Menlo Park, CA 94025)	0	3.379
201 California Street, Suite 610 San Francisco	0	4.166
201 Mission Street, Suite #2150 San Francisco	0	2.367
Rockville (702 King Farm Boulevard Rockville, MD 20850)	0	232.119
San Diego (4250 Executive Sq, Suite 600, La Jolla CA 92037)	0	4.854
Washington (1921 Gallows Road, 3rd Floor Tysons Corner, Virginia 22182 USA)	0	76.043
Buenos Aires (Corrientes Avenue 800, 33rd Floor Office 101 Buenos Aires, C1008 CABA, Argentina)	0	362.701
Sao Paolo	0	0.705
Toronto (400 University Avenue Suite 1620 Toronto, ON M5G 1S5)	0	16.597
Mexiko City	0	0.959

Facility	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Canberra (Level 5, 131 City Walk Canberra ACT 2601)	0	0
Melbourne (217 Blackburn Road Mount Waiverley VIC 3149)	0	0
Pitt Street (Suite 102, Level 1, 56 Pitt Street, Sydney NSW 2000 Australia)	0	0
9 Castlereagh Street, Level 17 Sydney	0	1.627
7/55 Clarence St, Sydney NSW 2000	0	0.017
52 Martin Place Sydney	0	4.883
Bligh Street (Level 3 1 Bligh Street Sydney, NSW 2000)	0	0
Beijing (Unit 01-03, 23th Floor, China World Tower B, No. 1 Jianguomenwai Avenue, Chaoyang District, 100004, Beijing China)	0	10.373
2904-7, 29/F, Man Yee Building 68 Des Voeux Road Central Hong Kong	0	0
14th Floor, Spaces Sun House 90 Connaught Road Central Sheung Wan Hong Kong Island	0	8.45
28/F LHT Tower 31 Queen's Road Central Hong Kong	0	46.48
Chennai	0	0
Western Express Hwy (7th & 8th Floor, Central Wing, Nesco IT 4, Western Express Highway, Goregaon East, Mumbai 400063 India)	0	203.101
Suite 9, Vatika Business Centre Trade Centre, Bandra Kurla Complex, Bandra East, Mumbai – 400 051, India	0	7.015
Marunouchi Kitaguchi Building, Floor 27, 1-6-5 Marunouchi Chiyoda-ku Tokyo 100-0005, Japan	0	0
Sumitomo Fudosan Kanda Building 16F 7 Kanda Mitoshiro-cho, Chiyoda-ku Tokyo 101-0053	0	34.468
Tekko Building 4F 1-8-2 Marunouchi, Chiyoda-ku Tokyo 100-0005	0	2.258
Kuala Lumpur	0	1.406
Manila Solaris (15F Solaris One Building, 130 Dela Rosa Street., Legaspi Village, Makati City 1229 Philippines)	0	70.353
Manila Ayala North Exchange (12F Ayala North Exchange Tower 2, 6796 Ayala Avenue, Legaspi Village Makati City 1229 Philippines)	0	113.304
103 Penang Road Unit 11-07 Visioncrest Commercial Singapore 238467	0	31.477
80 Robinson Road, #02-00 Singapore 068898, Singapore	0	0.772
#06-01 to 02 Ocean Financial Centre 10 Collyer Quay Singapore	0	8.718
9 Raffles Place, #56-01 Republic Plaza Tower 1 Singapore 048619	0	0
Conrad Tower Building Level 10, Unit 1006 Sheikh Zayed Road P.O. Box 27250 Dubai	0	0
Liberty House Level 8, App.810 P.O. Box: 482036 Dubai	0	1.791
Mayerhofgasse 1/19, 1040 Vienna	0	1.09
Chaussée de la Hulpe 166, 1170 Brussels	0	14.47
Square de Meeus 5-6, 1000 Brussels	0	10.731
Futura Business Park Building E, Sokolovska 662/136b Prague	0	81.2
Futura Business Park, Building B Prague	0	92.422
Rybna 14, Praha 1, 110 05 Prague	0	23.243
Copenhagen (Majsmarken 1 9500 Hobro Denmark)	0	0.467
1 London Bridge (4th & 5th Floor, West Building 1 London Bridge, London SE1 9BG, United Kingdom)	0	84.147
11 Westferry Circus Canary Wharf London E14 4HE, UK	0	114.885
Tunbridge Wells	0	6.794
Wokingham (Suite A, Ground Floor, Trinity Court Molly Millars Lane Wokingham RG412PY)	0	7.317
Grexel Systems Ltd. Lautatarhankatu 6 FI-00580 Helsinki	0	4.205
Rue de Surène 17 75008 Paris	0	3.954
5 Boulevard Montmartre, 75002 Paris	0	0
19, Boulevard Malesherbes, 75008 Paris	0	1.737
5 Rue du Renard, 75004 Paris	0	0.7
Kurfürstendamm 119 Berlin	0	5.66
Unter den Linden 38 Berlin	0	18.548
Marburger Straße 17 Berlin	0	42.085
The Cube (Mergenthalerallee 61 65760 Eschborn, Germany)	0	0
Mergenthalerallee 71-73, 65760 Eschborn	0	0
Tresor, Rechenzentrum Hausen Frankfurt	0	0
Rechenzentrum Hausen Frankfurt	0	0
Börsenplatz 4 Frankfurt	0	164.5
Poststelle Frankfurt	0	9.434
Friesstraße (Rechenzentrum, Bergen Enkheim Frankfurt)	0	0
Grüneburgweg 16-18 / Westend Carrée 60322 Frankfurt am Main	0	54.609
Frankfurt, Mainzer Landstr. 41	0	0
Haar (Münchener Straße 14 85540 Haar)	0	0
Augustplatz 9 Leipzig	0	19.867
Torgauer Str. 231 Leipzig	0	0
Munich (Goethestr, 28 D-80336 Munich)	0	0.449
Cork - Irland (NSQ1 Navigation Square, Albert Quay East, Cork Ireland)	0	0
Milan (Via Santa Maria Valle 3 (Regus Carrobbio) 20123 Milan, IT)	0	1.342
42 Avenue JF Kennedy, L-1855 Luxembourg	0	145.195
Rue Edward Steichen 22 Luxembourg	0	0
The Square 42 Avenue JF Kennedy L-1855	0	0.826
Amsterdam (Quarter Plaza Transformatorweg 90 1014 AK Amsterdam The Netherlands)	0	18.943
Warsaw (Sp. z.o.o. ALEJA JANA PAWŁA II 80 / 39 00-175 WARSAW, POLAND)	0	1.682
Torre Europa, Paseo de la Castellana 95-15ª, 28046 Madrid	0	1.072
Stockholm (Fleminggatan 7 5th Floor 112 26 Stockholm)	0	24.058

Facility	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Bern (Marktgasse 20 3011 Bern)	0	0.065
Zug Theilerstrasse 1A	0	5.387
Limmatquai 72 (2nd floor) / 8001 Zurich	0	0.262
Bleicherweg 10, 8002 Zurich	0	0
Hardstrasse 201, 8005 Zurich	0	1.035

## C7.9

**(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?**

Decreased

## C7.9a

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	0	No change	0	
Other emissions reduction activities	0	No change	0	
Divestment	0	No change	0	
Acquisitions	1093.63	Increased	16.24	Scope 1&2 emissions increased by 16.24% compared to previous year, due to the the acquisition of ISS. 2020 gross Scope 1 & 2 market-based emissions were 6736 tCO2e. The calculation for the emissions value % is therefore $(1093.63/6736)*100 = 16.24\%$ .
Mergers	0	No change	0	
Change in output	0	No change	0	
Change in methodology	0	No change	0	
Change in boundary	0	No change	0	
Change in physical operating conditions	0	No change	0	
Unidentified	0	No change	0	
Other	3842.63	Decreased	57.0462	Scope 1&2 emissions decreased by 57.05% compared to previous year, mostly due to the global covid 19 pandemic, as most employees worked from home throughout the year. Thus, direct and indirect emissions dropped. 2020 gross Scope 1 & 2 market-based emissions were 6736 tCO2e. The calculation for the emissions value % is therefore $(3842.63/6736)*100 = 57.05\%$ .

## C7.9b

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Market-based

## C8. Energy

### C8.1

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

More than 0% but less than or equal to 5%

### C8.2

**(C8.2) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	Yes
Consumption of purchased or acquired steam	Yes
Consumption of purchased or acquired cooling	Yes
Generation of electricity, heat, steam, or cooling	Yes

**C8.2a**

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	13751.45	6053.24	19804.69
Consumption of purchased or acquired electricity	<Not Applicable>	34898.78	5352.75	40251.53
Consumption of purchased or acquired heat	<Not Applicable>	0	3269.08	3269.08
Consumption of purchased or acquired steam	<Not Applicable>	0	940.01	940.01
Consumption of purchased or acquired cooling	<Not Applicable>	0	57.67	57.67
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	0	<Not Applicable>	0
Total energy consumption	<Not Applicable>	48650.23	15672.75	64322.9

**C8.2b**

**(C8.2b) Select the applications of your organization's consumption of fuel.**

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	No
Consumption of fuel for the generation of heat	No
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	Yes

**C8.2c**

**(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.**

**Sustainable biomass**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

**Other biomass**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

**Other renewable fuels (e.g. renewable hydrogen)**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

**Coal**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

**Oil**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

**Gas**

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

19804.69

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

17302

**Comment**

**Other non-renewable fuels (e.g. non-renewable hydrogen)**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

**Total fuel**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

<Not Applicable>

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

**C8.2d**

(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

	Total Gross generation (MWh)	Generation that is consumed by the organization (MWh)	Gross generation from renewable sources (MWh)	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	6003	5779	0	0
Heat	8638	8638	0	0
Steam	0	0	0	0
Cooling	3682	3682	0	0

**C8.2e**

(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in C6.3.

**Sourcing method**

Unbundled energy attribute certificates (EACs) purchase

**Energy carrier**

Electricity

**Low-carbon technology type**

Low-carbon energy mix, please specify (locations are supported by individual energy attribute certificates - the low carbon technology type differs)

**Country/area of low-carbon energy consumption**

Germany

**Tracking instrument used**

Contract

**Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)**

20594

**Country/area of origin (generation) of the low-carbon energy or energy attribute**

Germany

**Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)**

2021

**Comment**

**Sourcing method**

Unbundled energy attribute certificates (EACs) purchase

**Energy carrier**

Electricity

**Low-carbon technology type**

Low-carbon energy mix, please specify (locations are supported by individual energy attribute certificates - the low carbon technology type differs)

**Country/area of low-carbon energy consumption**

India

**Tracking instrument used**

Contract

**Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)**

1.2

**Country/area of origin (generation) of the low-carbon energy or energy attribute**

India

**Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)**

2021

**Comment**

---

**Sourcing method**

Unbundled energy attribute certificates (EACs) purchase

**Energy carrier**

Electricity

**Low-carbon technology type**

Low-carbon energy mix, please specify (locations are supported by individual energy attribute certificates - the low carbon technology type differs)

**Country/area of low-carbon energy consumption**

Czechia

**Tracking instrument used**

Contract

**Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)**

1919.66

**Country/area of origin (generation) of the low-carbon energy or energy attribute**

Czechia

**Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)**

2021

**Comment**

---

**Sourcing method**

Unbundled energy attribute certificates (EACs) purchase

**Energy carrier**

Electricity

**Low-carbon technology type**

Low-carbon energy mix, please specify (locations are supported by individual energy attribute certificates - the low carbon technology type differs)

**Country/area of low-carbon energy consumption**

Luxembourg

**Tracking instrument used**

Contract

**Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)**

9183.56

**Country/area of origin (generation) of the low-carbon energy or energy attribute**

Luxembourg

**Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)**

2021

**Comment**

---

**C8.2g**

---

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

**Country/area**

United States of America

**Consumption of electricity (MWh)**

2269.19

**Consumption of heat, steam, and cooling (MWh)**

137.01

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

2406.2

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Argentina

**Consumption of electricity (MWh)**

---



912

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

912

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Brazil

**Consumption of electricity (MWh)**

3.38

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

3.38

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Canada

**Consumption of electricity (MWh)**

82.63

**Consumption of heat, steam, and cooling (MWh)**

106.41

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

189.04

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Mexico

**Consumption of electricity (MWh)**

1.69

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

1.69

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Australia

**Consumption of electricity (MWh)**

120.37

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

120.37

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

China

**Consumption of electricity (MWh)**

137.87

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

137.87

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

---

India

**Consumption of electricity (MWh)**

229.46

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

229.46

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Japan

**Consumption of electricity (MWh)**

116.31

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

116.31

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Malaysia

**Consumption of electricity (MWh)**

1.69

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

1.69

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Philippines

**Consumption of electricity (MWh)**

265.79

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

265.79

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Singapore

**Consumption of electricity (MWh)**

264.97

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

264.97

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

United Arab Emirates

**Consumption of electricity (MWh)**

45.76

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

45.76

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

---

**Country/area**

Austria

**Consumption of electricity (MWh)**

3.38

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

3.38

**Is this consumption excluded from your RE100 commitment?**

&lt;Not Applicable&gt;

---

**Country/area**

Belgium

**Consumption of electricity (MWh)**

131.38

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

131.38

**Is this consumption excluded from your RE100 commitment?**

&lt;Not Applicable&gt;

---

**Country/area**

Czechia

**Consumption of electricity (MWh)**

1946.53

**Consumption of heat, steam, and cooling (MWh)**

943.29

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

2889.82

**Is this consumption excluded from your RE100 commitment?**

&lt;Not Applicable&gt;

---

**Country/area**

Denmark

**Consumption of electricity (MWh)**

1.69

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

1.69

**Is this consumption excluded from your RE100 commitment?**

&lt;Not Applicable&gt;

---

**Country/area**

United Kingdom of Great Britain and Northern Ireland

**Consumption of electricity (MWh)**

689.2

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

689.2

**Is this consumption excluded from your RE100 commitment?**

&lt;Not Applicable&gt;

---

**Country/area**

Finland

**Consumption of electricity (MWh)**

12.75

**Consumption of heat, steam, and cooling (MWh)**

22.85

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

35.6

Is this consumption excluded from your RE100 commitment?

<Not Applicable>

---

**Country/area**

France

**Consumption of electricity (MWh)**

284.36

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

284.36

Is this consumption excluded from your RE100 commitment?

<Not Applicable>

---

**Country/area**

Germany

**Consumption of electricity (MWh)**

21254.02

**Consumption of heat, steam, and cooling (MWh)**

13415.38

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

34669.4

Is this consumption excluded from your RE100 commitment?

<Not Applicable>

---

**Country/area**

Ireland

**Consumption of electricity (MWh)**

1989.13

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

1989.13

Is this consumption excluded from your RE100 commitment?

<Not Applicable>

---

**Country/area**

Italy

**Consumption of electricity (MWh)**

3.38

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

3.38

Is this consumption excluded from your RE100 commitment?

<Not Applicable>

---

**Country/area**

Luxembourg

**Consumption of electricity (MWh)**

9185.25

**Consumption of heat, steam, and cooling (MWh)**

1847.27

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

11032.52

Is this consumption excluded from your RE100 commitment?

<Not Applicable>

---

**Country/area**

Netherlands

**Consumption of electricity (MWh)**

32.39

**Consumption of heat, steam, and cooling (MWh)**

0

---

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

32.39

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Poland

**Consumption of electricity (MWh)**

1.69

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

1.69

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Spain

**Consumption of electricity (MWh)**

3.38

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

3.38

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Sweden

**Consumption of electricity (MWh)**

58.23

**Consumption of heat, steam, and cooling (MWh)**

114.55

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

172.78

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Switzerland

**Consumption of electricity (MWh)**

203.68

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

203.68

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

## C9. Additional metrics

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### C9.1

---

**(C9.1) Provide any additional climate-related metrics relevant to your business.**

**Description**

Other, please specify (Paper consumption)

**Metric value**

22.3

**Metric numerator**

tonnes

**Metric denominator (intensity metric only)**

**% change from previous year**

30.75

**Direction of change**

Decreased

**Please explain**

Most of the paper used is FSC certified and carries the EU Ecolabel.

---

**C10. Verification**

---

**C10.1**

---

**(C10.1) Indicate the verification/assurance status that applies to your reported emissions.**

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

**C10.1a**

---

**(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

independent-assurance-report\_2021\_de.pdf

**Page/ section reference**

4-23

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

---

**C10.1b**

---

**(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.**

**Scope 2 approach**

Scope 2 market-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

independent-assurance-report\_2021\_de.pdf

**Page/ section reference**

4-23

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

**C10.1c**

**(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.**

**Scope 3 category**

Scope 3: Business travel

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

independent-assurance-report\_2021\_de.pdf

**Page/section reference**

4-23

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

**C10.2**

**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

Yes

**C10.2a**

**(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?**

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C7. Emissions breakdown	Year on year change in emissions (Scope 1 and 2)	ISAE 3000	Although no additional data has been verified explicitly, the greenhouse gas emissions were also subject to verification last year, which is why the year on year changes in Scope 1+2 emissions as stated in the GRI Index 2021 also have a limited assurance independent-assurance-report_2021_de.pdf
C8. Energy	Year on year change in emissions (Scope 1 and 2)	IASSE 3000	Although no additional data has been verified explicitly, the greenhouse gas emissions were also subject to verification last year, which is why the year on year changes in Scope 3 emissions as stated in the GRI Index 2021 also have a limited assurance independent-assurance-report_2021_de.pdf
C7. Emissions breakdown	Year on year change in emissions (Scope 3)	ISAE 3000	Although no additional data has been verified explicitly, the greenhouse gas emissions were also subject to verification last year, which is why the year on year changes in Scope 3 emissions as stated in the GRI Index 2021 also have a limited assurance independent-assurance-report_2021_de.pdf

independent-assurance-report\_2021\_de.pdf

## C11. Carbon pricing

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### C11.1

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**(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?**

No, and we do not anticipate being regulated in the next three years

### C11.2

---

**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

Yes

#### C11.2a

---

**(C11.2a) Provide details of the project-based carbon credits originated or purchased by your organization in the reporting period.**

**Credit origination or credit purchase**

Credit purchase

**Project type**

Energy efficiency: industry

**Project identification**

Energy contract confirms that energy for the location Rue Edward Steichen 22 in Luxembourg is 100% from water power

**Verified to which standard**

Not yet verified

**Number of credits (metric tonnes CO2e)**

4952.6

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

4952.6

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Energy efficiency: industry

**Project identification**

Energy contract confirms that energy for the location 42 Avenue JF Kennedy in Luxembourg is 100% from water power

**Verified to which standard**

Not yet verified

**Number of credits (metric tonnes CO2e)**

4230.95

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

4230.95

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Other, please specify (Several certificates including Hydro-electric head installations as well as solar and wind technology)

**Project identification**

Several energy certificates for the locations in Prague

**Verified to which standard**

Other, please specify (EECS European Energy Certificate System)

**Number of credits (metric tonnes CO2e)**

1919.6

---



**Number of credits (metric tonnes CO2e): Risk adjusted volume**

1919.6

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Energy efficiency: industry

**Project identification**

Confirmation of energy supplier that energy for Data center Friesstr. is 100% from renewable sources.

**Verified to which standard**

Not yet verified

**Number of credits (metric tonnes CO2e)**

7804

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

7804

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Energy efficiency: industry

**Project identification**

Certificate confirms that energy for the locations in Eschborn is 100% from renewable sources.

**Verified to which standard**

Not yet verified

**Number of credits (metric tonnes CO2e)**

2960

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

2960

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Energy efficiency: industry

**Project identification**

Certificate confirms that energy for the location in Frankfurt Hausen is 100% from renewable sources.

**Verified to which standard**

Not yet verified

**Number of credits (metric tonnes CO2e)**

7196

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

7196

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Energy efficiency: industry

**Project identification**

---

Certificate confirms that energy for the data center Tresor is 100% from renewable sources.

**Verified to which standard**

Not yet verified

**Number of credits (metric tonnes CO2e)**

320

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

320

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Energy efficiency: industry

**Project identification**

Certificate confirms that energy for the location Börsenplatz 4 is 100% from renewable sources.

**Verified to which standard**

VER+ (TÜV SÜD standard)

**Number of credits (metric tonnes CO2e)**

2314

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

2314

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

CO2 usage

**Project identification**

Compensation of CO2 emissions of the location "The Cube" in Eschborn via the project portfolio of KlimaInvest Green Concepts GmbH.

**Verified to which standard**

Gold Standard

**Number of credits (metric tonnes CO2e)**

13240

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

13240

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

CO2 usage

**Project identification**

Compensation of CO2 emissions of the data center in Hausen via the project portfolio of KlimaInvest Green Concepts GmbH.

**Verified to which standard**

Gold Standard

**Number of credits (metric tonnes CO2e)**

445

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

445

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

## C11.3

---

### (C11.3) Does your organization use an internal price on carbon?

Yes

## C11.3a

---

### (C11.3a) Provide details of how your organization uses an internal price on carbon.

#### Objective for implementing an internal carbon price

Stakeholder expectations  
Change internal behavior  
Drive energy efficiency

#### GHG Scope

Scope 1  
Scope 2  
Scope 3

#### Application

Company-wide

#### Actual price(s) used (Currency /metric ton)

8.5

#### Variance of price(s) used

Uniform pricing

#### Type of internal carbon price

Offsets

#### Impact & implication

Deutsche Börse voluntary offsets its emissions to foster the transitioning to low-carbon activities, to drive emissions reductions and incentivize low-carbon activities – such as energy efficiency investments, clean energy or the development of green products/services – in order to facilitate our company-wide low-carbon transition and to reach our CO2 reduction target. We also calculate and consider our carbon exposure in terms of absolute costs incurred on an annual basis. The tool shifted investments toward energy efficiency measures and low-carbon initiatives. Concrete examples is the switch of the energy supply of office buildings towards renewable energies, the carbon neutralisation of business trips as well as an advanced infrastructure for e-mobility on-site.

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## C12. Engagement

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## C12.1

---

### (C12.1) Do you engage with your value chain on climate-related issues?

Yes, our suppliers  
Yes, our customers/clients  
Yes, other partners in the value chain

## C12.1a

---

**(C12.1a) Provide details of your climate-related supplier engagement strategy.**

**Type of engagement**

Other, please specify (Compliance & onboarding)

**Details of engagement**

Other, please specify (Code of conduct featuring climate change KPIs Climate change is integrated into supplier evaluation processes)

**% of suppliers by number**

99

**% total procurement spend (direct and indirect)**

97

**% of supplier-related Scope 3 emissions as reported in C6.5**

100

**Rationale for the coverage of your engagement**

We engage with our suppliers to understand their approach to ESG factors, including their environmental practices. With the help of this information we are able to inform and prioritise our supply chain selection, and to assess our procurement impacts on a broader basis. Deutsche Börse Group expects its supplier to be conscious of their social and ecological responsibility and to be committed to the principles of sustainability. Therefore it set up a Code of Conduct for Suppliers, that any new supplier must sign. This Code of Conduct defines the principles and standards required of DBG's suppliers of products and services with regard to their responsibilities to people and the environment. One of the stated aims of DBG is to work with its suppliers to implement on an ongoing basis the principles required by its Code of Conduct. DBG expects that its suppliers actively endeavour to observe the contents of the Code of Conduct below. Suppliers are also expected to urge their own suppliers to adhere to the contents of the Code of Conduct and to observe the principle of non-discrimination in their choice of suppliers and in their dealings with suppliers throughout the supply chain. The Group's goal is to implement as reliable a supplier strategy as possible and a stable procurement organisation; it aims to ensure that all suppliers and manufacturers deliver the price and performance of the products and services agreed. When choosing suppliers and service providers, the Group focuses on European vendors and takes care to ensure that their conduct is ethical.

**Impact of engagement, including measures of success**

As a rule, any new suppliers must sign Deutsche Börse Group's code of conduct for suppliers. In exceptional cases they may have a self-commitment in place that is at least equivalent. As a measure of success, we track the number of suppliers that have signed the code of conduct. The number of suppliers having signed the code of conduct for suppliers keeps rising steadily. Impact of engagement: DBG expects the supplier to seek to use and optimise environmentally-friendly methods in its operational processes and technologies. Moreover, DBG expects the supplier to observe national legal standards and international environmental protection standards, as well as to minimise its environmental burden and continuously improve its environmental protection standards. Furthermore, Category A and B suppliers are monitored and reviewed according to various risk criteria in cooperation with an external service provider. Classification of suppliers is dependent on their respective turnover. Category A suppliers are responsible for 70 per cent, category B suppliers for 20 per cent and category C suppliers for the remaining 10 per cent of the procurement volume. This "risk radar" monitors risks along the entire supply chain from (sub-)suppliers to logistics nodes, right through to the end customer. This process covers all types of risks and also includes environmental risks. In the event of any risk materialising, the early warning system will issue alerts by e-mail, which will then be evaluated manually. Depending on the level of impact, the Group will engage in an active dialogue with the contracting parties. Moreover, analyses facilitate the evaluation of latent risk exposures or negative trends (where no damage has occurred) in order to enact targeted measures designed to prevent such risks.

**Comment**

Code of Conduct for Suppliers: [https://www.deutsche-boerse.com/resource/blob/160140/1c1f46c778d9a738943749a37b6cb2d6/data/code-of-coduct\\_en.pdf](https://www.deutsche-boerse.com/resource/blob/160140/1c1f46c778d9a738943749a37b6cb2d6/data/code-of-coduct_en.pdf)

**C12.1b**

**(C12.1b) Give details of your climate-related engagement strategy with your customers.**

**Type of engagement & Details of engagement**

Collaboration & innovation	Other, please specify (Constant development of solutions fit for renewable energies (% as an estimate))
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**% of customers by number**

40

**% of customer - related Scope 3 emissions as reported in C6.5**

0

**Please explain the rationale for selecting this group of customers and scope of engagement**

EEX always involves customers in product development. Many of EEX's customers are energy companies active in renewable energies. Together with them EEX develops trading solutions fit for renewable energies.

**Impact of engagement, including measures of success**

Consultations, common development

**C12.1d**

**(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.**

Deutsche Börse is perfectly positioned to help promoting good practice across the industry and to foster climate-related knowledge building and dialogue among their partners. Therefore, Deutsche Börse founded the Green and Sustainable Finance Cluster Germany (GSFCG) in cooperation with the Hesse Ministry of Finance. The initiative seeks to make efficient use of the expertise in the area of sustainable finance and to implement specific courses of action to ensure the viability of financial market structures. The Cluster offers a continuous platform for dialogue around topics relating to green and sustainable finance that involves all relevant stakeholder groups, ranging from businesses, the public, lawmakers and regulators to scientists and academics. Its central objectives – creating transparency and supporting standardisation within the framework of sustainable financial structures – can only be achieved in close cooperation and open exchange with all parties involved. Against this background, the Cluster established a TCFD think tank for method development in the context of climate reporting in the financial industry. As important the TCFD recommendations are to financial institutions, so abstract and theoretical they are in the publication of the Task Force. The think tank of the cluster aimed to contribute to the bridging the gap between theory and practice. In four workshops, methods were developed to implement climate reporting along the entire value creation process. The participants came among other things from the asset management as well as CSR and risk departments of the members and supporters of the Cluster. The workshops not only served as a sort of preparation to implement the TCFD recommendations, but also encouraged the exchange between the participants. Consequently, the think tank strengthened the Cluster's position as competence center on topics related to sustainable finance and supports the goal of making more efficient use of financial market expertise in the area of sustainable finance.

Besides the engagement with partners from the financial industry, Deutsche Börse also cooperates with the real economy on climate-related topics. For example, the Head of Sustainability lead various workshops of econsense (for more information on this association please see 12.3 b) on Sustainable Finance where climate related topics were discussed.

Furthermore, Deutsche Börse's subsidiaries engage with its partner on climate-related topics, e.g. Qontigo strategically engages with its partners and has a collaborative approach when dealing with data providers in our value-chain. Qontigo relies on specialist, independent data providers to provide the highest quality data that are used in constructing indices. The collaborative approach allows to leverage the expertise within the data provider eco-system and contributes to creating robust solutions which utilises the most appropriate data. STOXX uses in particular CDP data, but also in combination with other ESG datasets, to create both Low Carbon and Climate Index solutions for clients.

Additionally, ISS - another subsidiary of Deutsche Börse - as one of the world's top three providers of ESG data and ratings is strategically engaging with its value chain, as it is a core part of their business model. Within its data collection processes, also within its rating process, a collaborative approach with the demand as well as the supply side is necessary and beneficial for all involved parties. Next to its data and rating services, ISS is also advising on proxy voting. This serves as another example of ISS' business activities requiring a high collaborative approach.

## C12.2

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**(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization's purchasing process?**

Yes, climate-related requirements are included in our supplier contracts

### C12.2a

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**(C12.2a) Provide details of the climate-related requirements that suppliers have to meet as part of your organization's purchasing process and the compliance mechanisms in place.**

**Climate-related requirement**

Complying with regulatory requirements

**Description of this climate related requirement**

The Code of Conduct for Suppliers states: DBG expects the supplier to observe national legal standards and international environmental protection standards.

**% suppliers by procurement spend that have to comply with this climate-related requirement**

100

**% suppliers by procurement spend in compliance with this climate-related requirement**

99.3

**Mechanisms for monitoring compliance with this climate-related requirement**

Supplier self-assessment

**Response to supplier non-compliance with this climate-related requirement**

No response

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**Climate-related requirement**

Fugitive emissions reductions

**Description of this climate related requirement**

The Code of Conduct for Suppliers states: DBG expects the supplier to minimise its environmental burden and continuously improve its environmental protection standards.

**% suppliers by procurement spend that have to comply with this climate-related requirement**

100

**% suppliers by procurement spend in compliance with this climate-related requirement**

99.3

**Mechanisms for monitoring compliance with this climate-related requirement**

Supplier self-assessment

**Response to supplier non-compliance with this climate-related requirement**

No response

---

**Climate-related requirement**

Other, please specify (Implementing efficient and environmental-friendly methods and technology)

**Description of this climate related requirement**

The Code of Conduct for Suppliers states: DBG expects the supplier to seek to use and optimise environmentally-friendly methods in its operational processes and technologies.

**% suppliers by procurement spend that have to comply with this climate-related requirement**

100

**% suppliers by procurement spend in compliance with this climate-related requirement**

99.3

**Mechanisms for monitoring compliance with this climate-related requirement**

Supplier self-assessment

**Response to supplier non-compliance with this climate-related requirement**

No response

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**C12.3**

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**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

**Row 1**

**Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate**

Yes, we engage directly with policy makers  
Yes, we engage indirectly through trade associations

**Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?**

Yes

**Attach commitment or position statement(s)**

Statement on Environmental Protection: [https://www.deutsche-boerse.com/resource/blob/3110270/8bfc48465d33f2f13e95a5b3aeb8017/data/statement-environmental-protection\\_en.pdf](https://www.deutsche-boerse.com/resource/blob/3110270/8bfc48465d33f2f13e95a5b3aeb8017/data/statement-environmental-protection_en.pdf)  
Memberships: [https://www.deutsche-boerse.com/dbg-en/sustainability/our-social-environment/memberships-statement-environmental-protection\\_en.pdf](https://www.deutsche-boerse.com/dbg-en/sustainability/our-social-environment/memberships-statement-environmental-protection_en.pdf)

**Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy**

Deutsche Börse Group has a centralised Group Regulatory Strategy (GRS) area, which is responsible for numerous projects relating to changes in Deutsche Börse Group's political and strategic environment. For matters relating to corporate sustainability or climate change, GRS has a specific and dedicated ESG Strategy Unit that responds directly to the Chief Executive Office (CEO) Division of Deutsche Börse Group. Sustainability considerations run through the entire political and regulatory work of Deutsche Börse Group. The core responsibility for public affairs related to commodity markets at large is delegated directly to EEX, the groups' commodity exchange. The working methods are identical and closely inter-coordinated. The overall approach is to take on a specific position in close consultation with the management of the business areas of the entire Group. Moreover, Group Regulatory Strategy at Deutsche Börse and EEX support and monitor political processes and regulatory developments. On an ongoing basis, staff also make strategic assessments and prepare briefing documents on regulatory and policy matters for key decision makers of Deutsche Börse Group. The centralised teams guarantee that position papers and other activities such as reports or presentations are developed together and hence are consistent and in line with the strategy of Deutsche Börse Group.

**Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**C12.3a**

**(C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?**

**Focus of policy, law, or regulation that may impact the climate**

Climate-related targets  
Electricity grid access for renewables  
Emissions trading schemes  
Energy attribute certificate systems  
Mandatory climate-related reporting  
Renewable energy generation  
Subsidies for renewable energy projects  
Transparency requirements

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

EEX is constantly engaging with policy makers on laws and regulation around renewable energies and emission trading systems.

**Policy, law, or regulation geographic coverage**

Global

**Country/region the policy, law, or regulation applies to**

<Not Applicable>

**Your organization's position on the policy, law, or regulation**

Neutral

**Description of engagement with policy makers**

EEX engages policy makers on possible designs of future energy markets and the integration of renewable energies in such a model. This has many different aspects. EEX regularly provides input to public consultation processes and through political position papers. In 2013, EEX responded to the public consultation of the European Commission (DG Energy) on generation adequacy, capacity mechanisms and the internal market in electricity. EEX endeavors to provide input from a market based perspective so that this approach is also considered when tackling the challenges from a European perspective in order to sustain a reliable electricity system. EEX also communicates its perspective via position papers and all related energy market topics. The EEX Paper on Energy Policy Cornerstones: Factors for the Success of the Energy Turnaround (2013) is one of the key documents outlining its position on the design and framework for energy markets. The position paper by EEX and EPEX SPOT (2014) covers the further development of the renewable support schemes in Germany - the German Renewable Energy Act (EEG). In 2015, EEX published a concept paper on the development of so-called "Energiewende" products (such as Cap Futures and Wind Power Futures). The assumption for these products is that the market price signal has a control function in the short run and a financing function for flexibility in the long run. A short-term demand for flexibility is created by the generation of renewable energies which cannot be planned with absolute reliability. Market players need tools to enable them to adjust their positions in the short run and to avoid imbalances between generation and consumption. In the long-term financing of flexibility, the challenge is to assess risks arising from short-term volume fluctuations and to transfer these into financial risks which can be controlled with the help of long-term trading products for the hedging of risks. In 2015, EEX participated extensively in the German Ministry of Economic Affairs' consultation process on the further development of the energy market design. EEX provided input to both the green and white papers published as part of this process. This process has resulted in a renewed power market law that strengthens the role of markets through a clear decision for market integration of renewables and the so-called 'energy only market' model.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

<Not Applicable>

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Other, please specify (Climate finance)

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

The "Green and Sustainable Finance Cluster Germany" is a sustainability initiative for the German financial market that was initiated in April 2018. It is a merger of the Accelerating Sustainable Finance initiative of Deutsche Börse and the Green Finance Cluster Frankfurt of the Ministry of Economic Affairs for Hesse. The aim is to support the transition to a climate-friendly and sustainable economy, starting with laying the groundwork in areas, including standards and further training, and to give Frankfurt a voice that resonates internationally. Moreover, the Cluster wants to enable cooperation that brings together the innovative forces and competencies from the financial industry, investor groups, political decision-makers and academia to produce a network organisation. One of the key conditions for the development and implementation of such solutions is the transition to a more sustainable financial system at both the local and global levels.

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

Germany

**Your organization's position on the policy, law, or regulation**

Support with no exceptions

**Description of engagement with policy makers**

We are generally calling for a valid carbon pricing and in particular in Germany we advocate a consistent pursuit of the energy transition and the coal withdrawal.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

<Not Applicable>

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Mandatory climate-related reporting

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

DBG has actively accompanied the implementation process of the EU directive on nonfinancial reporting. Regarding the directive, DBG has recommended the integration of material information in the audited status report due to higher transparency of future corporate value and existing risks.

**Policy, law, or regulation geographic coverage**

Global

**Country/region the policy, law, or regulation applies to**

<Not Applicable>

**Your organization's position on the policy, law, or regulation**

Support with no exceptions

**Description of engagement with policy makers**

Mandatory disclosure of relevant sustainability data within the scope of the audited financial statement of the listed companies (integrated reporting) taking into account the TCFD recommendations.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

<Not Applicable>

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Other, please specify (Cap and trade)

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

EEX engages directly with European and national policy makers and market participants to foster a dialogue and support market based solutions and support structural reform of the EU ETS. This supports the attainment of the EU 2030 and 2050 emissions reduction targets national emissions reductions targets as part of climate policy.

**Policy, law, or regulation geographic coverage**

Global

**Country/region the policy, law, or regulation applies to**

<Not Applicable>

**Your organization's position on the policy, law, or regulation**

Neutral

**Description of engagement with policy makers**

In 2015, EEX responded to the EU Consultation on revision of the EU Emission Trading System Directive where EEX states its support of the proposal to align the EU ETS cap with the EU's 2050 long-term ambition and the adjustment of the linear reduction factor. The proposed Market Stability Reserve is believed to send strong political signals and to increase trust in the EU ETS as a whole. EEX's answer to the consultation on the EU ETS Auctioning Regulation in March 2016. The EU ETS has established an EU-wide price signal for the emissions market, providing efficient signals to the market and reducing emissions. With DG Climate being the responsible administration for the joint EU auctioning platform and the German Ministry for Environment the responsible administration for the German auctioning platform EEX is in regular contact with both administrations to guarantee smooth operation of the auctioning platform it operates. EEX is a member of the EU working group of IETA (International Emissions Trading Association), and the IETA's "Business Partnership for Market Readiness" which supports governments worldwide in establishing new emission trading schemes. IETA is in regular contact with the EU Commission, Parliament, Presidency, and individual Member States to give a market perspective on policy



developments with respect to climate change. IETA subscribes to the objectives of the UNFCCC and ultimately climate protection; advocates the establishment of effective market-based trading systems for greenhouse gas emissions; and maintaining societal equity and environmental integrity while establishing these systems. Within EUROPEX (European Association of Energy Exchanges) EEX contributes through specialised working groups. EUROPEX's Environmental Market Working Group is voicing energy exchanges' positions on carbon and wider environmental markets policy issues and developments. EEX has contributed to a EUROPEX position paper on principles for the further development of carbon and wider environmental markets and other position papers.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

<Not Applicable>

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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C12.3b

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**(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.**

**Trade association**

Other, please specify (econsense - Forum for Sustainable Development of German Business)

**Is your organization's position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

We are not attempting to influence their position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

Econsense is an association of leading, globally active companies and organisations from the German business world. The initiative focuses on corporate responsibility and the development of ideas for a sustainable economy. The goal is to integrate topics of sustainability in companies' business activities. Sustainability and CSR have become globally guiding principles. In an open dialogue, the members of econsense strive to further advance the implementation of economic, social and ecological objectives, with the awareness that business with strengths in innovation and investment also assumes certain responsibility for the success of sustainable development. At the same time, companies can only discern their corporate social responsibility when supportive and reliable political framework conditions offer them a good environment. Uniting all econsense members is the conviction that sustainable development offers a strategy for companies to increase their long-term competitiveness and, thus, to remain "future proof". The objectives of econsense are: - To pool corporate activities on sustainability topics, such as climate protection and demographic change, and to jointly further develop these projects; - To actively shape the political and social discourse; - To credibly communicate the solution competence of the economy; - To strengthen the open dialogue between political and social groups; - To highlight the possibilities and limitations of corporate responsibility; and - To promote sustainability concepts and CSR in the business community and raise awareness of policymakers for framework conditions that promote innovation and competitiveness. The main topics covered by the association with respect to climate change include: Making Sustainability Measurable (Ratings/ Rankings/ Reporting), Sustainability along the Value Chain, Resource Efficiency, and Managing Climate Protection.

Vanessa Pütz from the ESG strategy unit at Deutsche Börse Group is member of the steering committee of econsense. Together with the management of the association, the steering committee is responsible for both the strategic alignment of econsense and the collaboration with the economy, politics, society and the media.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (The Sustainable Stock Exchanges (SSE))

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The Sustainable Stock Exchanges (SSE) initiative is a peer-to-peer learning platform for exploring how exchanges, in collaboration with investors, regulators, and companies, can enhance corporate transparency – and ultimately performance – on ESG (environmental, social and corporate governance) issues and encourage sustainable investment.

DBG takes an active role in the work of the SSE in various ways. In respect of the working groups, regular working group calls take place, in which DBG participates. Moreover, DBG supports the SSE in the preparation of reports and guidelines, also with regard to climate topics.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (UN Global Compact)

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

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**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The UN Global Compact is an initiative for companies that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. It is the broadest and most important network for corporate social responsibility issues.

Since July 2009, Deutsche Börse Group has participated in the United Nations Global Compact. As a participant, the company publicly pledges to adhere to the Compact's ten principles in the areas of human rights, labour, environmental protection, and anti-corruption. Unlike other financial services providers, such as banks or insurance companies, Deutsche Börse Group holds a unique position in the financial markets segment: its business model as well as the products and services it offers set it apart considerably from other financial services providers. As one of the world's largest stock exchange operators, Deutsche Börse Group organises markets characterised by the integrity, transparency, and security they offer investors, thereby providing the infrastructure which many service providers of the industry use for their products. Deutsche Börse Group endorses the UN's Universal Declaration of Human Rights. As a member of the UN Global Compact, Deutsche Börse Group is highly committed to implementing the UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption throughout the Group when designing our business processes and strategies. Deutsche Börse Group developed a range of initiatives in conjunction with the Global Compact's ten principles: - Deutsche Börse offers updated overview of DAX®-family indexes companies' sustainability reporting - Transparency – Cooperation with international ESG organizations - In line with our business – a new management body for sustainability - Joining the United Nations Sustainable Stock Exchanges initiative's ESG Model Guidance Campaign - Supplier Code of Conduct and Supply Chain Assessment - Sustainable index products - Target female quotas adopted - Improving our ecological footprint - Employment Rights - Trainings to prevent bribery, corruption and money laundering - Life & Family initiative

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (Society for environmental management and sustainability in financial institutes, VfU,))

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (Society for environmental management and sustainability in financial institutes, VfU,) is a network of financial service providers from Germany, Austria, Switzerland and Liechtenstein. The society and its members have been working on the development and implementation of innovative and sustainable solutions for financial service providers with the objective of increasing the contribution of the financial industry towards a sustainable development.

Deutsche Börse Group does not only participates in various events, organised by the VfU, especially in symposiums, around the topic of sustainability, but also organizes events alongside with the VfU. Furthermore, DBG ensures their "one voice" approach by binding all initiatives on the Green and Sustainable Cluster Germany. Also, DBG aims to strengthen knowledge transfer within its members.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (World Federation of Exchanges (WFE))

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

Established in 1961, the WFE is the global industry association for exchanges and clearing houses. Headquartered in London, it represents over 200 market infrastructure providers, including standalone CCPs that are not part of exchange groups. The WFE works with standard-setters, policy makers, regulators and government organisations around the world to support and promote the development of fair, transparent, stable and efficient markets. The WFE shares regulatory authorities' goals of ensuring the safety and soundness of the global financial system, which is critical to enhancing investor and consumer confidence, and promoting economic growth.

Deutsche Börse Group contributes actively in related works streams within the WFE - e.g. DBG was invited to participate in a work stream to create the world's first Sustainability Derivatives Framework.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (EUROPEX)

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

EUROPEX is a not-for-profit association of European energy exchanges. It represents the interests of 24 exchange-based wholesale electricity, gas and environmental markets and provides a European discussion platform on developments of the European regulatory framework for wholesale energy trading. Activities include: Promoting the role of energy exchanges as a way of increasing competition by creating price transparency and implementing the European single electricity and gas market Supporting the liberalisation of the different European electricity and gas systems Dealing with the issue of international trading, with special emphasis on providing a market solution to the congestion problems Maintaining a dialogue with the European Union authorities and with other European electricity, gas and environmental markets related entities Increasing co-operation between European energy exchanges and to promote free trade Collecting information, preparing reports and providing advice in matters related to the aforementioned objectives Assessing the need for recommendations regarding market information dissemination and market rules especially related to market power abuse Through its Environmental Market Working Group, EUROPEX voices its positions on carbon and wider environmental markets policy issues and developments. In its answer to the EU Consultation on revision of the EU Emission Trading System (EU ETS) Directive in March 2015, it stated that it "supports the proposal to bring the EU ETS cap in line with the EU's 2050 long-term ambition and the adjustment of the linear reduction factor to achieve this. The unambiguous commitment to this ambitious reduction path also contributes to decreasing insecurity due to interaction effects with other policies. Of course, these interaction effects with other policies have only to a limited extent been the cause of the current allowance surplus in the ETS, which is mainly a result of economic development. EUROPEX welcomes the discussion on structural reform at the European level. The proposed Market Stability Reserve (MSR) can send a strong political signal and contribute to increasing trust in the EU ETS as a whole. To function efficiently, an emissions market requires scarcity to create a price signal in addition to longterm predictability of rules and targets." One Executive Board members of EEX and the CEO of EEX Group companies, are Board Members of EUROPEX.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (IETA (International Emissions Trading Association))

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

IETA subscribes to the objectives of the UNFCCC and ultimately climate protection; advocates the establishment of effective market-based trading systems for greenhouse gas emissions; and maintaining societal equity and environmental integrity while establishing these systems. EEX is an active member of IETA, regulatory participating in the EU working group of IETA. IETA is in regular contact with members of the EU Commission, Parliament, Presidency, and individual Member States to voice member opinions on policy developments with respect to climate change.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

---

C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

**Publication**

In mainstream reports

**Status**

Complete

**Attach the document**

DBG-Detailed-GRI-index-Deutsche-Bo-rse-Group-AR-2021.pdf

**Page/Section reference**

p. 2-9

**Content elements**

Emissions figures

**Comment**

**Publication**

In mainstream reports

**Status**

Complete

**Attach the document**

DBG-annual-report-2021.pdf

**Page/Section reference**

p. 27-72

**Content elements**

Governance

Strategy

Risks & opportunities

Emissions figures

Emission targets

**Comment**

**Publication**

In mainstream reports, incorporating the TCFD recommendations

**Status**

Complete

**Attach the document**

DBG-annual-report-2021.pdf

**Page/Section reference**

p.21-72

**Content elements**

Risks & opportunities

**Comment**

<https://www.deutsche-boerse.com/dbg-en/sustainability/esg-reporting-ratings/tcf>

C15. Biodiversity

C15.1

(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	No, and we do not plan to have both within the next two years	<Not Applicable>	<Not Applicable>

C15.2

(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	Yes, we have endorsed initiatives only	<Not Applicable>	SDG

### C15.3

(C15.3) Does your organization assess the impact of its value chain on biodiversity?

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	No, and we do not plan to assess biodiversity-related impacts within the next two years	<Not Applicable>

### C15.4

(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity- related commitments
Row 1	No, and we do not plan to undertake any biodiversity-related actions	<Not Applicable>

### C15.5

(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	No	Please select

### C15.6

(C15.6) Have you published information about your organization's response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
No publications	<Not Applicable>	<Not Applicable>

### C16. Signoff

#### C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

#### C16.1

(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	CSO	Chief Sustainability Officer (CSO)

### SC. Supply chain module

#### SC0.0