



Anti-Harassment Guideline

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

Content

- 1. Purpose, Objectives and Basis** 3
 - 1.1. Purpose and Objectives 3
 - 1.2. Basis of this Written Rule 3
- 2. Scope and Target Groups** 3
 - 2.1. Scope of applicability 3
 - 2.2. Target groups 4
- 3. Definitions** 4
- 4. Minimum Requirements** 5
- 5. Roles and Responsibilities** 5
 - 5.1. Human Relations 5
 - 5.2. Legal Entities (Human Relations or equivalent) 5
- 6. Appendix** 6
 - 6.1. Contact Information 6
 - 6.2. Document History 6
 - 6.3. Related Written Rules 6
 - 6.4. Supporting Documents 7
 - 6.5. Abbreviations 7

1. Purpose, Objectives and Basis

1.1. Purpose and Objectives

Compliance with applicable laws, rules, regulations, and professional standards as well as internal policies and guidelines constitute a fundamental principle of Deutsche Börse Group's ("**DBG**") corporate culture.

This document ("**Guideline**") defines the minimum requirements for action in the event of harassment within DBG and legal entities to ensure equal treatment and equal opportunities for all employees, to eliminate discrimination and to promote diversity and inclusion in various ways.

DBG is aware of its responsibility to live integrity and identifies with the highest standards of professional cooperation. DBG and legal entities therefore pursue a guideline of zero tolerance towards harassment. The applicable laws, rules, regulations, and professional standards are followed to guarantee this and to protect the personality of each individual.

The following guideline offers guidance in case of an allegation of harassment to ensure fair and confidential clarification.

1.2. Basis of this Written Rule

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

2. Scope and Target Groups

2.1. Scope of applicability

Entity	Deutsche Börse AG (" DBAG ") and/or adopting legal entity within DBG
Area	All areas

Table 2: Scope

2.2. Target groups

Target group	Key message
All employees (including members of executive boards, interns, apprentices, students, temporary staff)	Should be aware of the anti-harassment guideline and an internal procedure meaning that any kind of harassment can lead to a disciplinary sanction after a clarifying process.
Employees within Human Relations	Should know and adhere to the requirements of this Guideline.

Table 3: Target groups

3. Definitions

Term	Definition
Direct discrimination	An individual is treated less favourably compared to others in similar situations due to a specific characteristic they possess.
Employee	Individual who is in an employment relationship with DBG and/or the legal entity according to national law or practice.
Indirect discrimination	A neutral rule disadvantages a person or a group sharing the same characteristics.
Incident	A complaint or grievance filed as part of a formal process, or a violation identified by the company through established procedures.
Harassment	A situation in which unwanted conduct related to a protected ground of discrimination occurs that is intended to violate a person's dignity and creates an intimidating, hostile, degrading, humiliating or offensive environment.

Table 4: Definitions

4. Minimum Requirements

To systematically deal with harassment caused by gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation and/or other reasons in the DBG or legal entity environment confidential reporting mechanisms, clear clarification processes and unambiguous descriptions of the consequences of harassment must be available to employees in the various roles. In addition, regular and sustainable measures must be implemented Group-wide to prevent and avoid harassment in the workplace.

DBG's legal entities are responsible for observing and complying with the minimum requirements in the event of a report of harassment that apply at the site according to national and local law. Where appropriate, cooperation with the relevant employee representatives is mandatory.

With reference to the contents listed under 4. this means in detail:

1. Reporting harassment: All employees are fully informed about the available options for reporting harassment. This includes both internal and external channels, such as a whistleblowing hotline or a special reporting office. Access to these reporting systems is always guaranteed, is anonymous and is not subject to any restrictions.
2. Procedures for investigating harassment reports: The legal entity ensures that the process for investigating reported harassment is known to all employees and is applied consistently. This procedure is based on applicable internal guidelines and external legal requirements and contains clear steps to ensure a fair and confidential investigation.
3. Assessment of reports: A standardized process is used to uniformly assess incidents of harassment, considering the different forms of harassment and their severity. This procedure ensures that all cases are assessed consistently and considering the circumstances of the individual case.
4. Consequences and measures: Based on the assessment, appropriate action is taken against the perpetrators. The possible consequences are clearly defined, and the implementation of the measures is transparent and communicated to the parties concerned.
5. Prevention measures: The company undertakes to ensure a harassment-free working environment. Regular training on this topic is mandatory for all employees. In addition, the training measures and the number of reported incidents is regularly reviewed and evaluated to continuously improve preventive measures.

5. Roles and Responsibilities

5.1. Human Relations

Human Relations is responsible for drafting, maintaining and publishing this Guideline. Furthermore, Human Relations is leading (if necessary, together with other control functions e.g. Compliance) the investigation process and the process for the definition of the respective disciplinary sanction in collaboration with the respective manager.

5.2. Legal Entities (Human Relations or equivalent)

In addition to complying with the above minimum requirements, each Legal Entity is responsible for ensuring compliance with the Code of Business Conduct, applicable (national and international) laws and regulations around anti-harassment.

To ensure this, each Legal Entity is advised to

1. regularly assess relevant (national) laws and regulation(s) applicable to them, considering at least their business activities and licenses, and jurisdiction(s) they operate or are represented in, and
2. take appropriate measures to comply with these specific requirements as needed.

To comply with specific (local) legal and/or regulatory requirements, where applicable, Legal Entities may - in addition to this Guideline - create and implement their own written rules which must not conflict with this Guideline, notably to impose more stringent or specify (local) requirements.

6. Appendix

6.1. Contact Information

Human Relations - HR Global Business Partner Department is the owner of this guideline and the first point of contact for the defined minimum requirements.

6.2. Document History

Document History

Version	Date	Changes & Background
1.0	01.10.2025	Initial version

Coordination before publication

Version	Date	Task	Function
1.0	Sept 2025	Creator	HR Global Business Partner
	Sept 2025	Content Review	Senior HR Global Business Partner
	Sept 2025	Content Confirmation Written Rule Owner	Head of HR Global Business Partner

Approvals

Version	Date	Task	
1.0	19.09.2025	Approval	Head of HR Global Business Partner

6.3. Related Written Rules

Superordinated Written Rules	<ul style="list-style-type: none"> • n/a
Subordinated Written Rules	<ul style="list-style-type: none"> • Anti-Harassment Procedure

6.4. Supporting Documents

Supporting Documents	<ul style="list-style-type: none"> • Code of Business Conduct • Deutsche Börse Group Statement on Human Rights • Policy statement on the Human Rights Strategy of Deutsche Börse AG
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6.5. Abbreviations

CSRD: Corporate Sustainability Reporting Directive

DBAG: Deutsche Börse AG

DBAG ExBo: Deutsche Börse AG Executive Board

DBG: Deutsche Börse Group

HR: Human Relations

LE: Legal Entity

N/a or n/a: Not applicable

***** END OF DOCUMENT *****