



Anti-Harassment Procedure

Version: 1.0

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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 changes compared to the previous document version are highlighted in color. <Due to the new creation, this has been omitted in this version.>

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1. Purpose, Objectives and Basis

1.1. Purpose and Objectives

At Deutsche Börse Group (DBG), we value and promote diversity and stand up against discrimination. As a global organization, we stand for recognition, appreciation and inclusion in the working environment, and advocate for and thrive through openness and fairness. We consider the wealth of backgrounds and ideas to be key to our success. To unlock the full potential of our diversity and ensure that everyone is treated with dignity, we will not tolerate any form of harassment in our working environment and between individuals.

DBG undertakes appropriate measures (i.e. training) necessary to prevent the occurrence of harassment. When informed of possible infringements, DBG will work towards resolving reported cases of harassment in a fair and unbiased manner and with the required confidentiality.

This procedure is in the responsibility of Human Relations, HR Global Business Partner, and will be published as well as developed further by this Section.

1.2. Basis of this Written Rule

The basis for this written rule is the thematically linked Anti-Harassment Guideline.

2. Scope and Target Groups

2.1. Scope of applicability

Entity	Deutsche Börse AG (“DBAG”) and/or adopting legal entity within DBG (each of DBAG and adopting legal entity referred to as “Legal Entity” or “LE”).
Area	All areas

Table x: Scope

2.2. Target groups

Target group	Key message
All employees (including members of executive boards, interns, apprentices, students, temporary staff).	Need to be aware of and comply with the requirements of this Procedure.

Table x: Target groups

3. Definitions

3.1. Moral harassment

Moral harassment occurs when a person employed by one of the DBG companies commits repeated and/or deliberate actions towards another individual with the aim or effect of harming or jeopardizing open and confident working conditions and/or causing damage to the physical or mental health of another individuals.

The Actions can be (exemplary, not conclusive):

- Offensive language, gossip, or slander
- Posters, graffiti, obscene gestures
- Abuse of internal e-mail systems, the internet or intranet
- Pestering, spying, stalking
- Persistent undermining of confidence, competence, and self-esteem
- Failing to acknowledge the rights or needs of people with different views or practices
- Undignified treatment or exclusion of people with disabilities or on the grounds of e.g., ethnicities, race, social origin, beliefs (e.g. Religious, political), sexual identities or -orientation, gender, (dis)abilities, generations, or personalities

3.2. Sexual harassment

Sexual harassment is an unwanted conduct of sexual nature, or a conduct based on sex or sexual preference which is offensive to the recipient. Examples of inappropriate behavior and sexual harassment include:

- Unwanted physical assault or contact, including unnecessary touching,
- Suggestive remarks including propositions that sexual favours may further someone's career or that refusal may damage it,
- Display or circulation of pornographic materials,
- Derogatory remarks or conduct that insults or ridicules or is intimidating or physically abusive of an individual.

3.3. Persons of Trust

As Persons of Trust defines this Procedure:

- Equal Opportunities Officers
- A Member of Staff Representation of the relevant location, if applicable
- A Member of the Human Resources (HR) Management Team
- Any member of the Inclusive Workplace Council

3.4. Persons

As person this Procedure defines:

- Employees
- Executives
- Students
- Interns
- Apprentices
- Service Providers

4. Requirements

This Procedure defines DBG's position of non-tolerance of any kind of harassment and provides for key standards in compliance with the [Code of Business Conduct](#), the Anti-Harassment Guideline, the Inclusion and Equal Opportunities Guideline and the different legal requirements applicable to DBG companies. Subject to respective applicable laws, DBG companies may have additional or more specific rules regarding Anti-Harassment, while the general frame provided by this Procedure is binding for all.

The steps to be followed are

- Reporting Harassment
- Investigating harassment reports
- Assessment of reports
- Consequences and measures

The first part of the following chapter determines the procedure if an individual is faced/confronted with moral or sexual harassment. In the second part, respective disciplinary actions in case of non-compliance with this Procedure are specified.

For ease of reference in the following descriptions, the Procedure will refer to the harassment victim as “the Individual”, and the person who is considered to be the perpetrator of the offense as “the Offender”.

4.1. Awareness

An Individual who believes that they have been subject to unwanted behavior / harassment is encouraged (if the situation permits it) to let the Offender know that their behavior is objectionable and ask for it to stop.

It is equally possible for the Individual to first discuss the situation with a Line Manager or a Person of Trust – see next step).

4.2. Contact Line Manager or a Person of Trust

If the Individual feels unable to address the Offender directly, the individual should seek assistance from the respective Line Manager (if not implicated in the offence) or a Person of Trust. A Member of the HR Management Team is to be involved.

The aim is to address and attempt to resolve the situation before it becomes necessary to raise a formal complaint. It is equally possible for the Individual to immediately raise a formal complaint.

The Individual's Line Manager and/or Person of Trust and the Member of the HR Management Team involved will ensure that any discussions remain confidential and will not be divulged to a third party until the Individual will allow it.

4.3. Formal complaint

Regardless of the severity, the Individual may raise a formal complaint to a Member of the HR Management Team, in writing, stating the name of the Offender, the nature, dates and times of the harassment, names of witnesses (if possible) to any incidents of harassment, and any action already taken to stop the harassment.

If the Individual feels more comfortable in making the formal complaint anonymously, the [whistle blower system](#) offered and operated by compliance can also be used. Any complaint with Harassment content addressed via the whistle blower system of DBG will be handled by a Member of the HR Management Team.

4.4. Investigation

A Member of the HR Management Team entrusted with the case and the respective Line Manager of the Individual (if not implicated in the offence) will conduct a thorough, discreet, and impartial investigation without undue delay.

The observations and results of this investigation are recorded and reported to the Individual as promptly as possible. If seen as helpful or necessary, an external legal counsel will be involved by the Member of the HR Management Team/respective Line Manager. Should it be considered essential, others may be involved as witnesses, but generally only with the consent of the Individual bringing the complaint.

The investigation will be conducted with all prudent steps by Human Resources and the Line Manager of the Individual (if not implicated in the offence) to protect the Individual and the witnesses from any intimidation, victimization, or discrimination.

Pending the investigation and its results, the Offender may be suspended. This decision will be taken by the Member of the HR Management Team entrusted with the case. Where the investigation finds the allegations of the Individual are proven, the Offender will meet disciplinary sanctions (see 4.5).

4.5. Disciplinary sanctions

If the formal complaint against the Offender is found valid, the Company will take the necessary disciplinary sanctions to ensure that the Offender shall not repeat their behavior. Disciplinary sanctions shall be consistent with the severity of the conduct of the Offender.

The Offender may be either warned orally, warned in written form, or dismissed in compliance with applicable law.

Please refer to the Disciplinary Action Guideline for further details.

If the formal complaint against the Offender is found invalid, and it is proven to be an obvious and malicious attempt by the Individual to damage reputation and/or career of the accused, the Company will take the necessary disciplinary sanctions regarding this behavior. Disciplinary sanctions shall be consistent with the severity of the offence.

The verifiably denouncing Individual may be either warned orally, warned in written form, or dismissed in compliance with applicable law.

Please refer to the Disciplinary Action Guideline for further details.

To ensure objectivity and fairness, any decision on disciplinary sanctions will be taken jointly by the Member of the HR Management Team and the respective Line Manager of the Individual (if not implicated in the offence).

If the Line Manager of the Individual is implicated, their Line Manager will take part in the decision-making process.

In cases where disciplinary sanctions are decided, and before such are imposed, the recipient of the disciplinary sanctions will be informed about the ability to contact a Staff Representative (relevant for locations with respective staff representation).

4.6. Recording

The result of the documented and filed, in the personnel files of the Individual and the Offender following the respective labor law/data protection rules.

5. Appendix

5.1. Contact Information

Human Relations is the owner of the Guideline and the first point of contact for the content.

5.2. Document History

Version	Date	Changes & Background
1.0	July 2025	Initial version due to written rule framework

Coordination before publication

Version	Date	Task	Function
1.0	May 2025	Creator	HR Global Business Partner
	May 2025	Content Review	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

5.3. Related Written Rules

Superordinated Written Rules	Anti-Harassment Guideline
Subordinated Written Rules	n/a

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