

**Deutsche Börse Group**

# **Diversity, Equity & Inclusion Policy**

September 2024

Public

## Table of Content

<b>1</b>	<b>Executive summary .....</b>	<b>2</b>
<b>2</b>	<b>Scope of application and ownership .....</b>	<b>2</b>
<b>3</b>	<b>Our commitment to diversity, equity &amp; inclusion at Deutsche Börse Group .....</b>	<b>2</b>
<b>4</b>	<b>Taxonomy .....</b>	<b>3</b>
<b>5</b>	<b>Responsibilities .....</b>	<b>3</b>
<b>6</b>	<b>Advocacy groups focusing on Diversity, Equity &amp; Inclusion topics .....</b>	<b>4</b>
6.1	The Diversity, Equity & Inclusion Council .....	4
6.2	Employee resource groups and networks .....	4
<b>7</b>	<b>Grievance resolution procedures .....</b>	<b>5</b>

---

## 1. Executive summary

Operating worldwide, we take pride in employing colleagues with a wealth of cultural backgrounds at numerous locations around the globe. However, our diversity is reflected not only in the origins or cultural backgrounds of our colleagues but also in the variety of their professional backgrounds and many other differences characterising each individual personality that is part of our team.

As a global organisation, we stand for recognition, appreciation, and inclusion in the working environment. For this reason, we are a signatory to the "[Diversity Charter](#)" and our [Code of Business Conduct](#) is proof of our commitment to our Group-wide social and corporate responsibility. We advocate for and thrive through openness and fairness. We consider the wealth of backgrounds and ideas to be key to our success.

This Diversity, Equity & Inclusion Policy (DEI Policy) sets out Deutsche Börse Group's commitment to a diverse and inclusive work environment for all Deutsche Börse Group staff. It further defines the key principles and taxonomy of the Deutsche Börse Group Diversity, Equity & Inclusion framework as laid out in chapter 4 of this policy.

## 2. Scope of application and ownership

The DEI Policy is applicable to all staff (i.e. individuals who are members of executive boards and management boards, managers, staff members and temporary employees) of all consolidated entities of Deutsche Börse Group at all their locations. Our commitment to diversity, equity, and inclusion is a statement by our company on tolerance and mutual respect in the workforce.

The responsibility for this policy lies with the Chief Diversity Officer.

## 3. Our commitment to diversity, equity & inclusion at Deutsche Börse Group

We believe diversity, equity, and inclusion to be vital to our global success. We also believe that we find strength in combining individual traits to fulfil our purpose. Therefore, Deutsche Börse Group is committed to creating a workplace where everyone feels included and welcome to contribute their ideas as part of a healthy and productive working environment. The key principles of our commitment are as follows:

- We are committed to a comprehensive policy of equal opportunities in employment. No job applicant or colleague is to receive less favourable treatment on grounds not relevant to good employment practice.
  - All colleagues – whether full-time, part-time, or temporary – will be treated fairly and respectfully and are to be encouraged and supported to develop their full potential and talents.
  - Selection for employment, promotion, training, compensation, or other benefits will be carried out on the basis of aptitude and ability. Any kind of discrimination, i.e., an unequal or prejudicial treatment concerning any dimension of the Diversity, Equity & Inclusion taxonomy as laid out in this policy, nor any form of bullying or harassment as defined in the Group's Anti-Harassment Policy is not acceptable.
  - We are committed to achieving short- and long-term goals in the area of Diversity, Equity & Inclusion that meet the evolving needs of our workforce, our business, and society, and will be articulated in concrete terms elsewhere. We further believe that fostering awareness by the means of communication is key to achieving such goals.
-

Our commitment extends to all areas of our business. It is recorded in this DEI Policy as well as publicly displayed on our [website](#) in form of our Diversity, Equity & Inclusion Statement.

## 4. Taxonomy

Diversity of the workforce describes the versatility of our colleagues in terms of differentiating characteristics according to the following taxonomy. The workforce of Deutsche Börse Group is composed of a wide variety of individuals that are reflective of the diversity of the societies in which it exists and operates.

Equity is the fundamental principle that ensures all colleagues have equal access to opportunities and resources, enabling everyone to make a meaningful contribution. The concept recognises that there are privileges for some people and barriers for others that need to be taken into account to create an inclusive work environment.

Inclusion refers to the extent to which organisations involve all colleagues. An inclusive work environment is characterised by colleagues feeling welcome to bring in their individual qualities. Characteristics belonging to the dimensions listed below that might otherwise be factors leading to them being excluded or marginalised are viewed as enrichment to Deutsche Börse Group's corporate culture.

We embrace a diverse workforce and inclusive work environment as we recognise and respect the qualities of our colleagues in accordance with the following dimensions:

- **Ethnicity & beliefs:** operating worldwide, diverse cultural backgrounds and origins contribute to our success. As part of our understanding of non-discriminatory interaction with one another, we treat all ethnicities and beliefs with respect.
- **Age & experience:** mixed-aged teams provide the advantage of continuous access to different knowledge and experience. For us, experienced colleagues with their professional know-how are just as important as young talents bringing in new ideas.
- **Sexual identity & orientation:** the sexual identity and orientation of colleagues is often considered a private matter and thus not relevant for everyday work life. Nonetheless, we aim to create a workplace where no one feels pressure to justify oneself but feels welcome and appreciated for being their true self. Our networks enable the exchange of experiences among their members.
- **(Dis-)abilities:** the experiences of people with physical, mental, or neurological impairments in the workplace are very diverse. We are committed to bringing the skills and potential of every individual to the fore as they form invaluable parts of our global teams.
- **Gender:** for us, gender topics play a major role in our objective to break down stereotypes. This applies to all biological genders and gender identities. We support a culture of openness in which gender and gender identity have no influence on the distribution of tasks, responsibilities, or career opportunities.

We value diverse ways of thinking and working and encourage all colleagues to bring in their individual ways of thinking and working to the benefit of their teams and be their true selves at work. This applies for as long as their conduct does not effectively violate the rights enjoyed by other persons or hinder daily work.

## 5. Responsibilities

Although the ownership of this policy lies within the responsibility of the Chief Diversity Officer, every individual who is part of the workforce is responsible for creating a diverse and inclusive corporate culture. All leaders and

---

colleagues are expected to respect the diversity among Deutsche Börse Group colleagues and all those with whom we do business. They are also expected to respect the life choices of others, if such life choices do not infringe on the rights enjoyed by other colleagues or interferes with business necessities.

Further, all leaders and colleagues working at Deutsche Börse Group are bound by its [Code of Business Conduct](#) to interact with each other with openness and confidence, and to intervene when witnessing any sort of discrimination or abuse.

Thus, every individual is called upon to proactively counteract any direct or indirect bullying, harassment, or discrimination at their own discretion, and actively foster an inclusive working culture. Colleagues are asked to assess situations that they observe with the help of common sense.

## 6. Advocacy groups focusing on Diversity, Equity & Inclusion topics

### 6.1 The Diversity, Equity & Inclusion Council

Deutsche Börse Group aims to be a pivot of excellence where tolerance, mutual respect and appreciation fosters innovation and growth. The main task of the Diversity, Equity & Inclusion Council (DEI Council) is to consolidate the Diversity, Equity & Inclusion framework to enable Deutsche Börse Group to achieve this goal.

The DEI Council is chaired by the Chief Diversity Officer and convenes regularly in order to drive forward issues and initiatives related to Diversity, Equity & Inclusion topics at Deutsche Börse Group. It is composed of various members. The members of the Council represent all consolidated entities of Deutsche Börse Group. The Chief Human Resources Officer (CHRO) of Deutsche Börse Group acts as a sponsor of the DEI Council. Additionally, there are two permanent guests, one from Human Resources and one from Group Communications & Marketing, to support programmatic changes suggested by the DEI Council and provide communicative support.

The DEI Council has the following mandates:

- Set the strategic direction for the company's diversity, equity and inclusion efforts globally
- Advise and report to the Executive Board on issues and initiatives related to the diversity, equity and inclusiveness of the workforce
- Develop and implement DEI initiatives with a global view and local adaptation when needed
- Build partnerships with other DEI groups within the group
- Act as persons of trust for colleagues who wish to report grievances related to the diversity, equity and inclusiveness of the workforce – informally and in full confidentiality – and discuss suitable solutions to the issue brought forward
- Monitor progress and take responsibility for measurable (data-driven) progress where possible

### 6.2 Employee resource groups and networks

Deutsche Börse Group recognises the value of allowing groups of employees with common interests to formalise their professional relationship by creating Employee Resource Groups (ERGs) and company-internal networks.

---

ERGs and networks are dedicated to fostering a diverse and inclusive work environment and are either organised around a specific interest group or at the level of one of Deutsche Börse Group's locations. ERGs and networks can provide cultural expertise to the Diversity, Equity & Inclusion Council and thus enable it to build cultural competence. They also facilitate relationships between Deutsche Börse Group and external communities and support specific business projects and initiatives.

## **7. Grievance resolution procedures**

Deutsche Börse Group does not tolerate unfair or prejudicial treatment of individuals or groups, bullying or harassment of any kind whatsoever. Deutsche Börse Group's position of non-tolerance of moral and sexual harassment as well as a description of the grievance resolutions policies that are in place are detailed in the Anti-Harassment Policy and the Disciplinary-Actions Policy of Deutsche Börse Group.