



## **Rules of procedure**

**Submission and handling of  
human rights and environmental-  
related complaints within  
Deutsche Börse Group**

## **1 Introduction**

The success of Deutsche Börse Group (DBG) is largely based on the trust of customers, employees, suppliers and shareholders as well as the public. In order to maintain the trust placed in Deutsche Börse Group by the company's various stakeholders, integrity and transparency in our business processes have the highest priority.

To contribute to the protection of human rights and environmental standards within our supply chains, we have implemented a complaints procedure that complies with the requirements of sections 8 and 9 of the German Act on Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltspflichtengesetz or LkSG).

Our complaints procedure allows (potential) human rights and environmental risks as well as violations to be reported within DBG and to its direct and indirect suppliers. The report can be submitted by individuals within DBG as well as external stakeholders.

## **2 Options for communication/ reporting**

Complaints can be submitted via our BKMS whistleblower system online and by telephone while maintaining anonymity. In addition, it is also possible to submit the complaint via e-mail ([humanrightsofficer@deutsche-boerse.com](mailto:humanrightsofficer@deutsche-boerse.com)). Answering the questions depicted in Appendix I as precisely as possible or using the PDF form provided will support the forthwith processing of the complaint.

The reporting of human rights and environment-related information and complaints is accessible around the clock, regardless of location, and there are no costs involved. Reports can be submitted in German, English and French.

Within Deutsche Börse Group, our Group Compliance department is responsible for handling complaints that are within the scope of the LkSG. The designated complaints processors involve the Human Rights Officer in the investigation of a human rights or environmental complaint where necessary.

## **3 Process of a human rights or environmental-related report**

As soon as a complaint is received under the category "Violation of human rights and environmental standards", the complaints processor is immediately notified of the receipt of a new report.

When reporting via the BKMS whistleblower system, the complainant has the option of setting up an anonymous mailbox to communicate with the complaints processor. If reports are sent to the complaints processor by e-mail, communication with the complainant takes place via e-mail or via the contact details provided by the complainant. The complaints processor acknowledges the receipt of the complaint within one week and informs the complainant about the next steps of the complaint procedure, the timeline and the rights of the complainant.

The complaints processor examines whether the complaint or the subject of the complaint is in fact a (potential) human rights or environment-related violation within the meaning of the LkSG.

If the complaint does not fall within the scope of protection under the LkSG or if it is identified as unfounded after an examination of the facts, the complainant will be informed of this.

If the complaint is considered valid and a more in-depth investigation is necessary, further steps will be taken to clarify the facts of the case.

If the complaints processor determines, after a thorough examination of the facts, that the complaint is well-founded, DBAG will endeavor to prevent, terminate or minimise the threatened or actual violation of human rights or environmental law standards by taking remedial and preventive measures within the meaning of sections 6 and 7 of the LkSG.

If a violation that has been identified at a direct supplier cannot be ended in a foreseeable period of time, DBAG will immediately develop and implement a concept for minimisation together with the direct supplier. The concept contains a concrete timetable. If the implementation of the concept fails, DBAG will initiate further remedial measures, taking into account all circumstances.

If a human rights or environmental violation is identified at the indirect supplier, DBAG will also immediately develop and implement a concept for prevention, termination, or minimisation together with the direct supplier.

The processing of the complaint is handled strictly confidential. DBG will only involve people who need to be involved. DBG protects the complainant from adverse effects to the best ability and does not tolerate any form of discrimination, punishment, or intimidation.

By adapting the internal risk analysis and taking appropriate preventive measures in cooperation with the respective direct suppliers, a violation can be avoided in the future.

DBG evaluates the effectiveness of the complaints process annually or/as needed.

## Appendix I

For efficient and fast processing, please provide us with the following information in as much detail as possible in addition to the description of the complaint:

Which entities of Deutsche Börse Group are affected?

Which supplier is affected by the complaint?

Is a specific production site, department or location of the supplier affected?

Is an employee of Deutsche Börse Group affected by the complaint?

Does the (potential) violation refer to a human right or is it a violation of an environmental-related standard?

Who are the persons affected, or harmed, and how serious is the violation?

Is there evidence such as photos, videos, or documents?

Has the complaint already been communicated elsewhere?

Has the violation of human rights/environmental standards already occurred?

Does the violation of human rights/environmental standards currently still exist?

In your opinion, what remedial measures should Deutsche Börse Group take to terminate or minimize the violation?

May the processor of the complaint contact you for clarification of the facts and determination of remedial measures? If yes, which communication channel (telephone, e-mail) do you prefer?