About this report

This report is an export of the individual Signatory organisation responses to the PRI Service Provider Reporting Framework during the 2019 reporting period. It shows your responses to mandatory indicators, as well as responses to voluntary indicators that your organisation has agreed to make public. You will be able to access the public RI Transparency report of your organisation and that of other signatories on the PRI website.

The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is an Index which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Index

The Index summarises the response status for the individual indicators and modules. It can be used by stakeholders as an ‘at a glance’ summary of reported information and to identify particular themes or areas of interest.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td>The signatory has completed all mandatory parts of this indicator</td>
</tr>
<tr>
<td>☑</td>
<td>The signatory has completed some parts of this indicator</td>
</tr>
<tr>
<td>❌</td>
<td>This indicator was not relevant for this signatory</td>
</tr>
<tr>
<td>-</td>
<td>The signatory did not complete any part of this indicator.</td>
</tr>
<tr>
<td>⚪</td>
<td>The signatory has flagged this indicator for internal review</td>
</tr>
</tbody>
</table>

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.
## Organisational Overview

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Short description</th>
<th>Status</th>
<th>Disclosure</th>
</tr>
</thead>
<tbody>
<tr>
<td>OO 01</td>
<td>Basic information</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>OO 02</td>
<td>Reporting year</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>OO 03</td>
<td>Signatory category and services</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>OO 04</td>
<td>Other offerings/business activities</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>OO 05</td>
<td>Breakdown of ESG coverage</td>
<td>✔</td>
<td>Asset mix disclosed in OO 06</td>
</tr>
<tr>
<td>OO End</td>
<td></td>
<td>✔</td>
<td>-</td>
</tr>
</tbody>
</table>

## Strategy and Governance

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Short description</th>
<th>Status</th>
<th>Disclosure</th>
</tr>
</thead>
<tbody>
<tr>
<td>SG 01</td>
<td>Responsible investment policy</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 02</td>
<td>Norms used to develop policies</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 03</td>
<td>Policy offerings to clients</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 04</td>
<td>ESG/RI in business offerings</td>
<td>✗</td>
<td>n/a</td>
</tr>
<tr>
<td>SG 05</td>
<td>Outsourcing of services</td>
<td>✔</td>
<td>Private</td>
</tr>
<tr>
<td>SG 06</td>
<td>Providing training/education</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 07</td>
<td>Applying, advancing and promoting the PRI principles</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 08</td>
<td>Actions taken to promote responsible investment</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 09</td>
<td>Long term trends</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 10</td>
<td>Interaction with asset owners</td>
<td>✗</td>
<td>n/a</td>
</tr>
<tr>
<td>SG 11</td>
<td>Aligning approach with investor goals</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 12</td>
<td>ESG recommendations not aligned with investor goals</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 13</td>
<td>Seeking feedback from clients</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG 14</td>
<td>Managing conflicts of interest</td>
<td>✔</td>
<td>Public</td>
</tr>
<tr>
<td>SG End</td>
<td></td>
<td>✔</td>
<td>-</td>
</tr>
</tbody>
</table>
Deutsche Börse AG

Reported Information

Public version

Organisational Overview

PRI disclaimer
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### Basic Information

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Location/Number of Offices</th>
<th>Regions</th>
</tr>
</thead>
<tbody>
<tr>
<td>OO 01.1</td>
<td>Select the location of your organisation's headquarters.</td>
<td>Switzerland</td>
<td>Ireland</td>
</tr>
<tr>
<td>OO 01.2</td>
<td>Indicate the number of countries in which you have offices (including your headquarters).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- 1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- 2 - 5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- 6 - 10</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- 11 - 50</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- &gt;50</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OO 01.3</td>
<td>Indicate the regions where you have offices.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Africa/Middle East</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Asia (excluding Japan &amp; Korea)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Australasia</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Canada</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Continental Europe</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Japan &amp; Korea</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Nordic</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- South America</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- UK &amp; Ireland</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- US</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OO 01.4</td>
<td>Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>FTE</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Reporting Year

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>OO 02.1</td>
<td>Indicate the year end date for your reporting year.</td>
<td>31/12/2018</td>
</tr>
</tbody>
</table>
Signatory category and services

OO 03  Mandatory  Public  Gateway

OO 03.1  Indicate which of the following categories reflect your core offering or main business activity:

- Reporting
- Active Ownership Services
- Investment consultancy
- Research and Data Provision
- Other, specify (1)
  - Index provider
- Other, specify (2)

OO 03.2  Indicate any other business activities that your organisation offers. Indicate whether you wish to report on these business areas.

- Reporting
- Active Ownership Services
- Investment consultancy
- Research and Data provision
- Other, specify (3)
- Other, specify (4)
- None of the above

OO 04  Mandatory  Public  Descriptive

OO 04.1  Please describe your core offering or main business activity.

About STOXX Ltd.

STOXX Ltd. is a global index provider, currently calculating a global, comprehensive index family of over 10,000 strictly rules-based and transparent indices. Best known for the leading European equity indices EURO STOXX 50, STOXX Europe 50 and STOXX Europe 600, STOXX Ltd. maintains and calculates the STOXX Global index family which consists of total market, broad and blue-chip indices for the regions Americas, Europe, Asia/Pacific and sub-regions Latin America and BRIC (Brazil, Russia, India and China) as well as global markets.

To provide market participants with optimal transparency, STOXX indices are classified into three categories. Regular “STOXX” indices include all standard, theme and strategy indices that are part of STOXX’s integrated index family and follow a strict rules-based methodology. The “iSTOXX” brand typically comprises less standardized index concepts that are not integrated in the STOXX Global index family, but are nevertheless strictly rules-based. While indices that are branded “STOXX” and “iSTOXX” are developed by STOXX for a broad range of market participants, the “STOXX Customized” brand covers indices that are specifically developed for clients and do not carry the STOXX brand in the index name.

STOXX indices are licensed to more than 500 companies around the world as underlyings for Exchange Traded Funds (ETFs), futures and options, structured products and passively managed investment funds. Three of the top ETFs in Europe and approximately 25% of all assets under management are based on STOXX indices. STOXX Ltd. holds Europe’s number one and the world’s number two position in the derivatives segment.

STOXX is part of Deutsche Boerse Group, and also markets the DAX indices.

www.stoxx.com & www.dax-indices.com
STOXX, Deutsche Boerse Group and their licensors, research partners or data providers do not make any warranties or representations, express or implied, with respect to the timeliness, sequence, accuracy, completeness, currentness, merchantability, quality or fitness for any particular purpose of its index data and exclude any liability in connection therewith. STOXX, Deutsche Boerse Group and their licensors, research partners or data providers are not providing investment advice through the publication of indices or in connection therewith. In particular, the inclusion of a company in an index, its weighting, or the exclusion of a company from an index, does not in any way reflect an opinion of STOXX, Deutsche Boerse Group or their licensors, research partners or data providers on the merits of that company. Financial instruments based on the STOXX® indices, DAX® indices or on any other indices supported by STOXX are in no way sponsored, endorsed, sold or promoted by STOXX, Deutsche Boerse Group or their licensors, research partners or data providers.
Deutsche Börse AG

Reported Information

Public version

Strategy and Governance

PRI disclaimer

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## Policy on ESG beliefs

### SG 01

**Mandatory**

<table>
<thead>
<tr>
<th>SG 01.1</th>
<th>Describe how your organisation’s philosophy incorporates environmental, social and governance factors, and the link to your business offerings.</th>
</tr>
</thead>
</table>

The sustainability principles of Deutsche Börse Group also apply to STOXX Ltd. Organising capital markets characterised by transparency, safety and integrity is not only the public-service mission and core business of Deutsche Börse Group, but it is also its most important value contribution to society. We assume responsibility for the markets we organise, our employees, the environment and society.

Companies are responsible - not just for their business, but also for their social environment. Deutsche Börse Group takes this responsibility very seriously and puts it into practice in its company-wide sustainability management. We see this commitment as an ongoing obligation to our employees, customers and investors, society and the environment to ensure that our company remains competitive in the long term, taking all our relevant stakeholder groups into account.

In April 2018, Deutsche Börse Group’s initiative "Accelerating Sustainable Finance" and the Hesse Ministry of Economics' "Green Finance Cluster" merged to form the "Green and Sustainable Finance Cluster Germany e. V." (GSFCG).

The goal of this new Cluster is to enhance the expertise on sustainable finance in the market, put that expertise to efficient use, and identify (as well as take) specific action to make national and international financial markets structures fit for the future.

The Cluster has defined four fields of action: sustainable finance - status quo and innovation; data and digitalisation; metrics and standards; dialogue and knowledge development.

It coordinates the activities of the participating institutions within these fields of action and brings them together with policymakers, regulators, civil society and academia.

At a European level, the Cluster is a member of the technical expert group on sustainable finance and thus actively involved in the European Commission's Action Plan on sustainable finance, whose implementation the Cluster supports.

### SG 01.2

Indicate whether you have policies that formalise the incorporation of your ESG beliefs in your business offerings.

- ✔ Yes

### SG 01.3

Indicate the components/types of your internal policy and provide the URL and/or an attachment of the document/s if they are publicly available.

**Policy components/types**

- □ Policy setting out your overall ESG/RI approach
- ✔ Formalised guidelines on environmental factors

**Public availability**

- ✔ URL
Formalised guidelines on social factors

Formalised guidelines on corporate governance factors

Formalised guidelines on engagement approach

Formalised guidelines on (proxy) voting approach

This CoC defines the principles and standards required of DBG’s suppliers of products and services re their responsibilities to people and the environment.
Public availability

- URL

*URL* (hyperlink:https://deutsche-boerse.com/resource/blob/160140/4b9eb4d95ab17773371aa27b8f3a1def/data/code-of-conduct_en.pdf)

- Attachment
- Not publicly available
- Other, specify (2)
- None of the above

**SG 01.4** Indicate how these are put into practice internally across the organisation.

- Regular employee training on RI/ESG
- Regular RI/ESG policy awareness building for employees
- Establishment of policy review committee/team
- Remuneration linked to achieving ESG objectives
- Annual performance incentives
- Other, specify (1)
  - Tracking and reporting of relevant KPIs in Deutsche Börse AG’s annual report
- Other, specify (2)
- Other, specify (3)
- No

**SG 02**

<table>
<thead>
<tr>
<th>Mandatory</th>
<th>Public</th>
<th>Descriptive</th>
</tr>
</thead>
</table>
Indicate what frameworks and guidelines you have used to develop your organisation’s policies. Tick all that apply.

☐ UN Principles for Responsible Investment
☒ UN Global Compact Principles
☒ UN Guiding Principles on Business and Human Rights
☒ Universal Declaration of Human Rights
☒ UN Sustainable Development Goals
☐ International Bill of Human Rights
☒ International Labour Organisation Conventions
☐ IFC Performance Standards
☐ United Nations Convention Against Corruption
☐ OECD Principles of Corporate Governance
☐ OECD Guidelines for Multinational Enterprises
☐ GRI standards
☐ Other, specify (1)
☐ Other, specify (2)
☐ Other, specify (3)
☐ None of the above

Indicate whether you offer standard, off the shelf, policies to clients as part of your product offerings, and/or whether you create tailored versions for individual clients.
<table>
<thead>
<tr>
<th></th>
<th>Off the shelf</th>
<th>Tailored</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asset class-specific RI guidelines</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sector-specific RI guidelines</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Screening/exclusions policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engagement policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Proxy) voting policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RI guidelines set out within the Investment Policy Statement (IPS)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RI guidelines set out in a freestanding RI policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi-year RI implementation project plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conflict of interest management policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stockbroker allocation policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Securities lending policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other, please specify (1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other, please specify (2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other, please specify (3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>None of the above</td>
<td>☑</td>
<td>☑</td>
</tr>
</tbody>
</table>

**SG 03.3** Additional information. [OPTIONAL]

Not applicable to STOXX Ltd.

**SG 06** Mandatory

<table>
<thead>
<tr>
<th>Public</th>
<th>Descriptive</th>
</tr>
</thead>
</table>
SG 06.1 Indicate whether you provide training/educational services on ESG/RI. Tick all that apply.

- Board/trustee training
- Investment manager training
- Regulatory bodies/authorities or public policy makers
- Corporate executive training
- ESG analyst training
- Other, specify (1) Research paper, events, webinars, articles & interviews on STOXX Pulse Online blog re ESG, etc.
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)
- None of the above

SG 06.2 Describe the main components of your training/educational services on ESG/RI and any variations depending on the group you provide training/education to.

Website, articles and customer events.

Beyond the above mentioned classical offering related to training & education services, Deutsche Börse Group and other stakeholders initiated the “Green and Sustainable Finance Cluster Germany e. V.” (GSFCG).

The goal of this new Cluster is to enhance the expertise on sustainable finance in the market, put that expertise to efficient use, and identify (as well as take) specific action to make national and international financial markets structures fit for the future.

The Cluster has defined four fields of action: sustainable finance - status quo and innovation; data and digitalisation; metrics and standards; dialogue and knowledge development.

It coordinates the activities of the participating institutions within these fields of action and brings them together with policymakers, regulators, civil society and academia.

At a European level, the Cluster is a member of the technical expert group on sustainable finance and thus actively involved in the European Commission’s Action Plan on sustainable finance, whose implementation the Cluster supports.

SG 06.3 Describe whether these training/educational services include any commercial elements.

The content is educational and engagement-oriented. The indices used as proof points & data points can be used for passive investment purposes (i.e. can be considered commercial indirectly).

SG 06.4 Additional information. [OPTIONAL]

In addition to the above, Deutsche Börse Group as a parent company is offering such services. For example, webinars on sustainability / ESG related topics and specific events for a broad variety of stakeholders.
SG 07.1 Describe how your organisation applies, advances and promotes the PRI Principles.

STOXX Ltd. (STOXX) is a signatory of the PRI since 2012. STOXX is a wholly owned subsidiary of Deutsche Börse Group (DBG) since 2015 and PRI is an important partner for DBG.

Beside different events hosted and co-hosted with the PRI, DBG is collaborating closely with the PRI through different Initiatives in means of content and development of sustainable finance.

For example, the PRI is member of the Accelerating Sustainable Finance Initiative, established by Deutsche Börse Group along with major stakeholders from the Frankfurt/Main financial centre and signed the associated Frankfurt Declaration. The Frankfurt Declaration demonstrates the signatories’ intention to define the framework conditions for sustainable finance and to put concrete initiatives in place in the Frankfurt financial centre. These are directed towards the identification of innovative business areas and the responsible handling of risks, among other things. The implementation of sustainable finance infrastructure must therefore be fully encouraged in order to support positive economic and social development, while protecting the natural capital, which is the foundation of all economic activity.

In April 2018, Deutsche Börse Group’s initiative “Accelerating Sustainable Finance” and the Hesse Ministry of Economics’ “Green Finance Cluster” merged to form the “Green and Sustainable Finance Cluster Germany e. V.” (GSFCG). The goal of this new Cluster is to enhance the expertise on sustainable finance in the market, put that expertise to efficient use, and identify (as well as take) specific action to make national and international financial markets structures fit for the future.

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SG 07.2 Highlight whether there are any ways that your organisation would like to engage further with the PRI. [OPTIONAL]

Yes, events, education, research, content, promotion etc.

SG 08 Mandatory Public

SG 8.1 Indicate which of the following actions your organisation has taken to promote responsible investments during the reporting year, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoken publicly at events and conferences to promote responsible investment
- Written and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Written and published articles on responsible investment in the media
- Policy engagements and other interactions
- Other, specify
- None of the above
Deutsche Börse Group’s objectives and strategies include discharging its corporate responsibility holistically. Therefore, the Group Sustainability unit manages and oversees all sustainability related initiatives and topics and is in charge of the above mentioned activities.

<table>
<thead>
<tr>
<th>SG 8.2</th>
<th>Additional information. [OPTIONAL]</th>
</tr>
</thead>
</table>

**SG 09** | **Mandatory** | **Public** | **Descriptive** |
| **SG 09.1** | Indicate which of the following long-term trends are addressed in your product outputs. |
| ☑ Changing demographics |

<table>
<thead>
<tr>
<th><strong>SG 09.2</strong></th>
<th>Explain how this long-term trend affects your product outputs.</th>
</tr>
</thead>
</table>
| Under the roof of STOXXs “Thematic Index suite” the topic of “Changing Demographics” is addressed ie STOXX® Millenials Index  
https://www.stoxx.com/index-details?symbol=STXMLNGR  
STOXX® Silver Economy  
https://www.stoxx.com/index-details?symbol=STXSLVGR |
| ☑ Climate change |

<table>
<thead>
<tr>
<th><strong>SG 09.2</strong></th>
<th>Explain how this long-term trend affects your product outputs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>STOXX built a full family of Climate change and low-carbon related indices which are already licensed to institutional investors, who use them (the indices) as an underlying for the promotion of ESG/RI investment.</td>
<td></td>
</tr>
</tbody>
</table>
| ☐ Resource scarcity  
☑ Technology developments |

<table>
<thead>
<tr>
<th><strong>SG 09.2</strong></th>
<th>Explain how this long-term trend affects your product outputs.</th>
</tr>
</thead>
</table>
| Samples:  
STOXX® Global Industry 4.0  
https://www.stoxx.com/index-details?symbol=STXIN4GR  
STOXX® Global AI  
https://www.stoxx.com/index-details?symbol=STXAIV  
STOXX® Global Electric Vehicles & Driving Technology  
https://www.stoxx.com/index-details?symbol=STXELVGR  
iSTOXX® Developed Markets B.R.AI.N.  
https://www.stoxx.com/index-details?symbol=IXBRANGR |

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SG 11 Mandatory Public Descriptive

SG 11.1 Describe how you typically align your organisation’s philosophy and approach to ESG/RI with your investor clients’ goals.

☐ Describe

Deutsche Börse Group continuously interacts with a large number of different stakeholder groups, whose significance for the company we evaluated in an internal survey of the Group's divisions. Depending on their points of view, i.e. whether they consider Deutsche Börse as a capital market organiser or whether they regard it as a listed company, stakeholders and their interests can vary.

A fixed component of Deutsche Börse Group's sustainability strategy is a process-oriented materiality analysis. The objective is primarily to incorporate the expectations and requirements of our relevant internal and external stakeholder groups on an ongoing basis. Only by doing so we can identify the opportunities and risks of our core business activities early on, analyse them and translate them into specific fields of action for the company. The following link provides more information on Deutsche Börse Group's stakeholder groups, the dialogue formats we use and an insight into a materiality matrix with the areas in which we need to take action.


☐ This is not relevant for my organisation

SG 12 Mandatory Public Descriptive

SG 12.1 Describe what steps you take, if any, when your ESG recommendations are not in line with your investor clients’ goals.

☐ Describe

We can customize mandates and indices to meet investor goals.

☐ This is not relevant for my organisation

SG 13 Mandatory Public Descriptive

SG 13.1 Indicate whether you seek feedback from clients on your RI/ESG services and product offerings

☐ Yes

SG 13.2 Describe how you use this feedback in your RI/ESG services and product offerings.

Our Global Sales teams have continuously open dialogues with clients about how our services can suit their needs.

☐ No
SG 14.1 Indicate whether your organisation has a policy for managing potential conflicts of interest.

- Yes

SG 14.2 Describe how you manage potential conflicts of interest.

Acting responsibly means having values that are shared by all employees throughout the Group. In 2017, Deutsche Börse AG’s Executive Board adopted an extended code of business conduct. This document, which is applicable throughout the Group, defines the foundations of key ethical and legal standards, including - but not limited to - the following topics:

- Confidentiality and the handling of sensitive information
- Conflicts of interest
- Personal account dealing, as well as the prevention of insider dealing and market manipulation
- Company resources and assets
- Combat of bribery and corruption
- Risk management
- Whistle-blowers
- Environmental awareness
- Equal opportunities and protection against undesirable behaviour

The code of business conduct applies to members of the Executive Board, all other executives and all employees of Deutsche Börse Group. In addition to specifying concrete rules, the code of business conduct provides general guidance as to how employees can contribute to implementing the defined values in their everyday working life. The goal of the code of business conduct is to provide guidance on working together in the company on a day-to-day basis, to help resolve any conflicts and to resolve ethical and legal challenges. All newly hired employees receive the code of business conduct as part of their employment contract documentation. Staff who were already in the company prior to the introduction of the code of business conduct were familiarised with the guidelines in 2018 through an online training course, following which they had to confirm having received the document and having understood its content. The code of business conduct is an integral part of the relationship between employer and employees at Deutsche Börse Group. Breaches may lead to disciplinary action. The document is available on www.deutsche-boerse.com > Sustainability > Set an example > Employees > Guiding principles.

SG 14.3 Describe how you ensure that company employees do not derive any personal gain from the use of information collected during your work process.

Compliance has overall responsibility for identifying and managing Group-wide compliance risks. Compliance devises risk-oriented measures in order to contain and manage corresponding risks, communicating risks, incidents, and the effectiveness of the measures taken; it ensures continuous improvement of the compliance management system by way of regular adjustments to the relevant internal guidelines and processes. Key compliance topics are discussed by Deutsche Börse's Group Compliance Committee, which comprises senior management representatives from the business divisions and the relevant Group-wide control functions.

Compliance has implemented Group-wide guidelines covering relevant local requirements. These rules are designed to ensure that the internal stakeholder groups acting on behalf of Deutsche Börse Group comply with the behavioural rules set out in such guidelines, with the objective of countering breaches of compliance throughout the Group in a preventive, investigative and sanctioning manner. Group-wide communications via the intranet are geared towards providing employees (including members of the Executive Board and Managing Directors) with the necessary guidance in their daily work, and making sure they commit to such guidance. In addition, all external staff and service providers must sign a form through which they undertake to comply with Deutsche Börse Group’s compliance regulations, including rules to combat corruption.

Regular compliance training is essential for a culture of compliance throughout Deutsche Börse Group: employees worldwide are being trained with respect to relevant compliance issues - covering, in particular, the areas of money laundering/terrorism financing, data protection, corruption, market manipulation and insider trading. Managers who are exposed to increased compliance risks.
on account of their activities receive additional training in line with their needs. Participation in training measures covering the compliance topics mentioned above is mandatory for employees, as well as for management.

Deutsche Börse Group has established a whistleblowing system, where employees can relay information about potential or actual breaches of regulatory rules or ethical standards, by phone or e-mail, whereby the anonymity of whistle blowers is a fundamental guarantee. Through its commitment to compliance awareness, Deutsche Börse Group cultivates an open approach to dealing with misconduct. For this reason, reports received are often passed on directly to the responsible line manager, or to Compliance. During 2018, five reports were submitted via the whistleblowing system, or directly via line managers or control functions (such as Compliance).

SG 14.4 Additional information. [OPTIONAL]

Acting responsibly means having values that are shared by all employees throughout the Group. In 2017, Deutsche Börse AG's Executive Board adopted an extended code of business conduct: this document, which is applicable throughout the Group, defines the foundations of key ethical and legal standards, including - but not limited to - the following topics:

- Confidentiality and handling of sensitive information
- Conflicts of interest
- Personal account dealing, as well as prevention of insider dealing and market manipulation
- Corporate funds and assets
- Anti-bribery and corruption
- Risk management
- Whistleblowing
- Ecological awareness
- Equal opportunities and protection from unsolicited behaviour

The code of business conduct applies to members of the Executive Board as well as to all other managers, and to all employees of Deutsche Börse Group. In addition to specifying concrete rules, the code provides general guidance as to how employees can contribute to implementing the defined values in their everyday working life. The goal of the code of business conduct is to provide guidance on working together in the company on a day-to-day basis, to help resolve any conflicts and to resolve ethical and legal challenges. All newly-hired employees will receive the code as part of their employment contract documentation. Staff who were already in the company prior to the introduction of the code will familiarise themselves with the guidelines within the scope of an online training course, following which they will need to confirm having attended the course and having understood its content. The code of business conduct will evolve into an integral part of the relationship between employer and employees at Deutsche Börse Group. Breaches of the code may lead to disciplinary action. The document is available on www.deutsche-boerse.com > Sustainability > Set an example > Employees > Guiding principles.