

Modern Slavery Statement

For the Financial Year Ending 31 December 2025

Eurex Frankfurt AG (ARBN 100 999 764)

Prepared in accordance with the Australian *Modern Slavery Act 2018* (Cth)

1. Introduction

This Modern Slavery Statement is issued by Eurex Frankfurt AG (**Eurex Frankfurt**), a German corporation limited by shares and registered in Australia as a foreign company (ARBN 100 999 764), for the financial year ending 31 December 2025.

Eurex Frankfurt publishes this statement as part of its ongoing approach to identifying and addressing modern slavery risks in accordance with the *Modern Slavery Act 2018* (Cth), as a foreign corporation conducting business in Australia.

Although Eurex Frankfurt's presence in Australia is limited, it remains committed to responsible business conduct and transparency and to the ongoing enhancement of the due diligence arrangements applied across its operations and supply chain.

This Modern Slavery Statement has been approved by the Executive Board of Eurex Frankfurt AG and is published in accordance with the mandatory criteria in section 16 of the *Modern Slavery Act 2018* (Cth).

2. About Eurex Frankfurt

Structure

Eurex Frankfurt is a wholly owned subsidiary of Deutsche Börse AG and forms part of the Deutsche Börse Group. The Deutsche Börse Group operates globally with over 14,500 employees across 56 locations.

Eurex Frankfurt has two subsidiaries that it wholly owns, being Eurex Clearing AG (**Eurex Clearing**) and Eurex Repo GmbH (**Eurex Repo**).

Operations

Eurex Frankfurt is headquartered in Frankfurt/Main, Germany. Eurex Frankfurt's operations are primarily based in Germany and the European Economic Area (**EEA**), with limited service provision to clients in Australia.

Eurex Frankfurt operates Eurex Deutschland (**Eurex**), one of the world's leading derivatives exchanges, and provides access to a broad range of financial instruments to its diverse client base. Eurex Frankfurt holds an Australian market licence granted by the Australian Securities and Investments Commission (ASIC) in March 2004 and provides financial market infrastructure services to a limited number of Australian clients. During the reporting period, Eurex Frankfurt had one employee based in Sydney, Australia from 11 June 2025 to 31 January 2026 through its Australia Representative Office. Aside from this limited local presence, Eurex Frankfurt does not maintain any employees in Australia.

The subsidiaries offer services which are complementary to Eurex Frankfurt's services. Neither Eurex Clearing nor Eurex Repo have employees, offices, or property located in Australia.

Eurex Clearing AG is a licensed central counterparty (CCP) under the European Market Infrastructure Regulation (EMIR), providing clearing services for a wide range of asset classes including derivatives, equities, bonds and secured funding transactions. Further information is available at <https://www.eurex.com/ec-en/>.

Eurex Repo GmbH operates regulated electronic markets for repurchase agreements and secured funding. It holds a multilateral trading facility (MTF) licence under German law. One of its key offerings is GC Pooling, a standardised secured funding market where participants trade cash against predefined baskets of collateral, such as ECB-eligible securities and equities. These transactions are centrally cleared by Eurex Clearing and support efficient liquidity and collateral management under standardised legal and risk frameworks. Further information is available at <https://www.eurex.com/ex-en/find/about-us/eurex-repo>.

Supply Chain

Eurex Frankfurt, Eurex Clearing, and Eurex Repo's supply chain is integrated into the broader Deutsche Börse Group procurement framework and includes suppliers of IT infrastructure, professional services, office-related services (e.g. cleaning, facility management), and intercompany services from other Group entities.

Eurex Frankfurt, Eurex Clearing and Eurex Repo maintain a supplier base across a diverse global footprint, reflecting the international nature of their operations. As of the reporting period, most suppliers of Eurex Frankfurt, Eurex Clearing and Eurex Repo are located in Germany, the United Kingdom, the United States, Hong Kong and the Netherlands. The European Union and the United Kingdom are governed by broadly aligned regulatory frameworks on modern slavery and human rights, including the German LkSG and the UK Modern Slavery Act.

The top five industries in which suppliers operate include:

1. Legal and accounting activities,
2. Financial service activities, except insurance and pension funding,
3. Computer programming, consultancy and related activities,
4. Activities of head offices; management consultancy activities,
5. Data processing, hosting and related activities; web portals.

To identify and assess modern slavery risks within our supply chain, we have implemented a risk-based approach that considers geographic exposure and industry-specific risk factors. We have identified a subset of suppliers operating in higher-risk jurisdictions.

During the reporting period, suppliers were identified in high-risk jurisdictions, notably Saudi Arabia (SA) and the United Arab Emirates (AE). In Saudi Arabia, the identified supplier is engaged in security services and commodity contracts brokerage. In the United Arab Emirates, the supplier primarily operates in financial service activities (excluding insurance and pension funding).

3. Identifying the Risks of Modern Slavery Practices

Eurex Frankfurt acknowledges that modern slavery risks may arise in its operations and supply chains, particularly through indirect exposure via third-party suppliers. Accordingly, Eurex Frankfurt has undertaken a scoping exercise to identify the areas of risk where its operations and supply chains may either cause, contribute to or be directly linked to modern slavery practices.

Sector and industry risks

Eurex Frankfurt and its subsidiaries operate within the financial services industry, providing financial market infrastructure services. Eurex Frankfurt is aware that the financial services industry presents unique modern slavery risks as businesses in this industry may indirectly contribute to modern slavery practices through the users of its services, as well as complex supply chains.

Product and services risks

Eurex Frankfurt and its subsidiaries provide financial market infrastructure services which facilitate the operation of financial systems through platforms for trading, clearing and settlement of transactions. Eurex Frankfurt's role in enabling transactions means that it may unknowingly facilitate the laundering of proceeds from modern slavery practices.

Eurex Frankfurt and its subsidiaries procure IT hardware and software services through their supply chains, and there is accordingly a risk of modern slavery, particularly where components originate from high-risk jurisdictions.

There is also a risk of modern slavery in relation to outsourced services such as cleaning, facility management, or security, where labour conditions are not within the control of Eurex Frankfurt.

Geographic risks

Eurex Frankfurt keeps a detailed list of the jurisdictions in which its suppliers are located. As outlined above, these jurisdictions, by number of contractors, are primarily the EEA, Switzerland, the United Kingdom, the United States, and Hong Kong.

As noted above, Eurex Frankfurt also has suppliers that are located in jurisdictions which have been identified as having a higher geographic risk of modern slavery, often due to poor governance, weak rule of law, conflict, migration flows and/or socio-economic factors like poverty. The geographic area of highest risk that has been identified within Eurex Frankfurt's supply chains is the United Arab Emirates, where Eurex Frankfurt sources certain financial services and IT services, due to its high prevalence of modern slavery practices (particularly within its migrant workforce). Eurex Frankfurt monitors its presence in the United Arab Emirates in light of this context. Eurex Frankfurt also closely monitors developments in Israel and assesses whether any changes to its supplier relationships, due diligence approach or other mitigation measures are required.

Entity risk

Eurex Frankfurt and its subsidiaries utilise services provided to and by other Deutsche Börse Group entities, which may in turn present similar risks as outlined above through their supply chains and operations.

4. Actions Taken to Assess and Address Risks

Eurex Frankfurt recognises the importance of identifying and mitigating the risk of being directly linked to modern slavery practices through its operations and supply chain. Eurex Frankfurt and its subsidiaries take a risk-based and proportionate approach to assessing and addressing the risks identified in Part 3 of this statement, recognising that these risks and the relevant regulatory environment may evolve over time.

Due Diligence

Deutsche Börse AG is obliged to comply with human rights and environment-related due diligence obligations under the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz* - **LkSG**). Related policies, guidelines and procedures are maintained and updated on an ongoing basis, taking into account changes in applicable legal requirements and relevant internal and external developments.

Eurex Frankfurt is aware of the modern slavery risks that may arise through its supply chain, including in jurisdictions where modern slavery practices are more prevalent, and seeks to ensure that such risks are appropriately considered in its business practices through due diligence and risk management processes.

Eurex Frankfurt applies relevant elements of the group-wide risk management and due diligence framework established by Deutsche Börse AG under the LkSG, which is periodically reviewed and refined. The framework comprises a range of processes and controls designed to support the identification, prioritisation and management of potential human rights and environmental-related risks in the supply chain.

These measures include, among other things, (i) risk analysis and monitoring processes (including the use of external inputs where appropriate), (ii) supplier onboarding expectations (including adherence to the Deutsche Börse Group Supplier Code of Conduct), (iii) contractual provisions addressing human rights and environmental standards, (iv) mechanisms for raising concerns (including the Deutsche Börse Group whistleblower system (BKMS) which allows for anonymous reporting and is accessible to employees and third parties), and (v) screening processes intended to identify adverse media that may indicate heightened risk in relation to direct or indirect suppliers.

The risk analysis is an assessment of potential human rights and environmental risks and is performed twice a year for LkSG-relevant entities and their direct suppliers. This assessment considers human rights and environmental factors, including modern slavery and child labour, in the context of the suppliers' industry and country and identifies high-risk suppliers. Further steps for suppliers with a higher risk involve the "Supplier Self-Assessment", where suppliers are asked to provide additional information about their human rights and environmental efforts, as well as the initiation of appropriate escalation procedures, if needed. In addition, human rights related training materials in line with the LkSG are available for all employees and dedicated trainings can be organised for selected employees and suppliers classified as high-risk suppliers.

Continuous Improvement

Eurex Frankfurt is committed to the continuous improvement of its approach to modern slavery risk management and ESG considerations in its business and operations. Policies, guidelines and procedures are reviewed and, where appropriate, updated on an ongoing basis to reflect evolving regulatory requirements, supervisory expectations and the broader operating environment. This includes monitoring relevant legislative and regulatory developments that may influence due diligence and risk analysis practices.

Eurex Frankfurt also benefits from training and awareness-raising measures conducted at Deutsche Börse Group level, which may include e-learning modules on topics such as anti-money laundering and human rights compliance.

Management of potential cases of modern slavery

Eurex Frankfurt has internal and external mechanisms for raising concerns, including in relation to potential modern slavery. As part of the Deutsche Börse Group, Eurex Frankfurt has access to group-wide grievance and complaint channels through which known or suspected human rights or environmental-related concerns can be reported.

At Deutsche Börse Group level, a standardised electronic whistleblower system (BKMS) is available for anonymous reporting and is accessible to both employees and external third parties. Reports can be submitted online at <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=TJ5nTE&c=-1&language=eng> or by telephone at + 49 (0) 30 99257146 using the access code 5851. The automated telephone intake is available in German, English and French.

In addition, Deutsche Börse Group maintains a functional email address (humanrightsofficer@deutscheboerse.com) through which human rights or environmental-related complaints can be submitted to the Human Rights Officer (HRO).

Reports that are raised through these channels are assessed and, where appropriate, investigated on a case-by-case basis in accordance with applicable group processes. As Eurex Frankfurt forms part of the Deutsche Börse Group, these processes apply to Eurex Frankfurt.

Where a concern is substantiated, appropriate measures may be taken depending on the circumstances, including the nature and severity of the issue and any mitigation or remediation steps already implemented by the relevant supplier or other third party. Measures may include, where warranted, engagement with the relevant party to support mitigation and remediation and, in certain circumstances, the restriction or termination of the business relationship.

Eurex Frankfurt supports transparency and cooperation in its supplier relationships and may engage with suppliers as appropriate as part of mitigation and remediation efforts. A designated supervisory function at Deutsche Börse Group level conducts periodic assessments to support compliance with due diligence obligations under the German Supply Chain Due Diligence Act (LkSG) and the UK Modern Slavery Act.

Corrective actions are supported by ongoing dialogue with suppliers and a structured framework that includes risk analysis and prevention, complaint mechanisms, documentation and reporting, and continuous risk monitoring. Based on the information available during the reporting year, Eurex

Frankfurt has not identified any substantiated cases of modern slavery and, accordingly, no corrective actions were required.

In 2025, no complaint concerning Eurex Frankfurt was assessed as relevant or substantiated, as no risk or violation was identified.

5. Assessing the Effectiveness of Actions

The effectiveness of Eurex Frankfurt's actions is assessed through the Deutsche Börse Group's internal control and audit mechanisms. These include:

- Annual reviews of the risk analysis and due diligence processes by the Central Monitoring Function (CMF).
- Tracking of supplier compliance with the Supplier Code of Conduct.
- Monitoring of grievance reports and follow-up actions.
- Periodic updates to the policy statement on human rights strategy, based on risk assessments and stakeholder feedback.

The Executive Board of Deutsche Börse AG is informed about the work of the CMF and the Human Rights Officer at least annually in the form of a report and on an ad hoc basis. Such reports cover the activities of Eurex Frankfurt AG and its subsidiaries.

That report is prepared by the CMF in coordination with the Human Rights Officer. It particularly highlights the implementation of due diligence obligations, audit actions to assess these, the identified potential LkSG and modern slavery-related risks, and the mitigating measures taken in this context.

The Executive Board members can address their LkSG and modern slavery-related questions or comments on the LkSG Risk Management Report, such as suggestions for improving existing processes, to the Human Rights Officer at any time.

The internal report is also sent to the Group Sustainability Committee of the Deutsche Börse Group and presented during a meeting. The CMF also reports certain key matters (such as receipt of complaints, status of escalation processes, current key figures of direct suppliers etc.) and other relevant information to the Human Rights Officer on a quarterly basis. The Human Rights Officer is also involved in escalation processes and decisions by the CMF on an ad hoc basis, if necessary.

Eurex Frankfurt will continue to refine its approach in line with the principle of continuous improvement and in alignment with the UN Guiding Principles on Business and Human Rights.

6. Consultation

Eurex Frankfurt has coordinated closely with relevant functions within Deutsche Börse Group, including Group Compliance, Group ESG Strategy, and Group Purchasing, to ensure alignment with group-wide policies and risk management practices.

Eurex Frankfurt's subsidiaries have been provided with a draft version of this statement and given an opportunity to provide feedback or request clarification in relation to it.

7. Approval and Signature

This statement was approved by the Executive Board of Eurex Frankfurt AG on 18 June 2026.

Signed,

A handwritten signature in grey ink, appearing to read 'MD', with a stylized flourish at the end.

Melanie Dannheimer

Member of the Executive Board
Eurex Frankfurt AG