

Modern Slavery Statement

For the Financial Year Ending 31 December 2024

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 made 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 December 2024.

This initial modern slavery statement has been prepared on the basis that Eurex Frankfurt has recently identified its status as a reporting entity under the *Modern Slavery Act 2018* (Cth) as a foreign corporation conducting business in Australia.

Though its presence in Australia is limited, Eurex Frankfurt endeavours to demonstrate its commitment to responsible business conduct and transparency, and commits to continuous improvement of its due diligence processes within its operations and supply chain.

This Modern Slavery Statement has been approved by the Executive Board of Eurex Frankfurt AG and addresses the key 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 period that this report covers, Eurex Frankfurt has a single sales employee in Australia, but does not maintain any property or permanent offices in Australia.

The subsidiaries offer services which are complementary to Eurex Frankfurt’s services. As with Eurex Frankfurt, 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) license under German law. One of its key offerings is GC Pooling, a standardized 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 standardized 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’s suppliers are primarily located in the EEA and Switzerland, as well as other selected jurisdictions. Of the total supplier network, approximately 54.76% are based in the EEA or Switzerland, while the remaining 45.24% are located in other jurisdictions. A detailed breakdown of the supplier jurisdictions for Eurex Frankfurt, Eurex Clearing, and Eurex Repo is provided in the table below.

Jurisdiction	Number of suppliers	Supply Chain Distribution by Country (%)	Industry
Germany	90	42.86	Head Office Functions (including business travel arrangements) Marketing and production of marketing materials Logistics IT support services (including development) Professional support services, including legal and consulting Financial service and other support services

Great Britain	20	9.52	<p>Marketing and production of marketing materials</p> <p>Logistics</p> <p>IT support services (including development and information security services)</p> <p>Professional support services, including legal and consulting</p> <p>Financial service and other support services</p>
United States of America	19	9.05	<p>Marketing and production of marketing materials</p> <p>Logistics</p> <p>IT support services (including development)</p> <p>Professional support services, including legal and consulting</p> <p>Financial service and other support services, including contract brokerage</p>
The Netherlands	14	6.67	<p>Head office support functions</p> <p>Marketing and production of marketing materials</p> <p>Logistics</p> <p>IT support services (including development)</p> <p>Professional support services, including consulting</p> <p>Financial service and other support services, including contract brokerage</p>
Hong Kong	14	6.67	<p>Regional head office support functions</p> <p>Marketing and production of marketing materials</p> <p>Logistics</p>

			<p>IT support services</p> <p>Professional support services, including consulting, accounting, and insurance services</p> <p>Financial service and other support services, including contract brokerage</p>
Singapore	10	4.76	<p>Marketing and production of marketing materials</p> <p>Logistics</p> <p>IT support services</p> <p>Professional support services, including consulting, accounting, and insurance services</p> <p>Financial service and other support services, including contract brokerage</p>
France	6	2.86	<p>Marketing and production of marketing materials</p> <p>Logistics</p> <p>Financial service and other support services</p>
Australia	5	2.38	<p>Professional support services, including administration, consulting, accounting, and legal services and legal services</p>
Ireland	5	2.38	<p>IT support services (including development, processing and hosting)</p>
Switzerland	4	1.90	<p>Logistics</p> <p>Professional support services, including consulting</p>
Japan	4	1.90	<p>Regional head office functions</p> <p>Marketing and production of marketing materials</p> <p>Professional support services, including legal, accounting and consulting</p>

Luxembourg	3	1.43	Production of marketing materials Logistics Professional support services, including consulting
Republic of China (Taiwan)	3	1.43	IT support services (including development) Marketing and production of marketing materials
United Arab Emirates	3	1.43	Financial service and other support services IT Support services (including development)
Finland	2	0.95	Logistics
Austria	1	0.48	Accommodation
Czech Republic	1	0.48	Other professional services, including education services
Spain	1	0.48	Accommodation
Israel	1	0.48	Financial service activities, except insurance and pension funding
Malta	1	0.48	Financial service activities, except insurance and pension funding
Mauritius	1	0.48	Other activities auxiliary to financial service activities
South Africa	1	0.48	Security and commodity contracts brokerage
Sweden	1	0.48	Organization of conventions and trade shows

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) through its supply chains procures IT hardware and software services, 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, given this context.

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 risks of being directly linked to modern slavery practices through its operations and supply chain. Below are the ways in which Eurex Frankfurt and its subsidiaries address and mitigate the risks identified in Part 3 of this statement.

Due Diligence

The Deutsche Börse Group is obliged to comply with human rights and environment-related due diligence obligations under the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz - LkSG*).

Further, Eurex Frankfurt is aware of the risks of modern slavery which arise through its supply chain, including in jurisdictions where modern slavery practices are more prevalent, and ensures that these risks are considered in its business practices through a rigorous due diligence process.

Eurex Frankfurt relies on the group-wide risk management and due diligence framework established by Deutsche Börse AG under the LkSG. This includes:

- A centralised risk analysis process supported by an external provider (EcoVadis), which assesses suppliers based on country, sector, and ESG risk indicators.
- A “risk radar” system that issues alerts for potential human rights violations, which are then reviewed manually.
- A supplier onboarding process that includes mandatory adherence to the Deutsche Börse Group Supplier Code of Conduct.
- Contractual clauses requiring suppliers to comply with human rights and environmental standards.
- A whistleblower system (BKMS) that allows anonymous reporting of human rights concerns, accessible to employees and third parties.
- A tool-based “Negative News Screening” process. Whenever the tool identifies adverse media or negative news that could be environmental or human rights violations by direct or indirect suppliers, a notification is received at the Deutsche Börse Group level.

Continuous Improvement

Eurex Frankfurt is committed to continuous improvement of its due diligence systems and its approach to ESG considerations in its business and operations. In this respect, for the next reporting period Eurex Frankfurt will be focussing on monitoring the legislative developments of the European Supply Chain Law (being the Corporate Sustainability Due Diligence Directive, or CSDDD), in particular with regard to the expanded catalogue of human rights and the associated impact on due diligence obligations in risk analysis, as well as the implementation of the newly published Group ESG Compliance Guideline in order to mitigate the risk of Green- and Social washing.

Eurex Frankfurt also benefits from regular training and awareness-raising measures conducted at Deutsche Börse Group level, including e-learning modules on anti-money laundering and human rights compliance.

Management of potential cases of modern slavery

Eurex Frankfurt has both internal and external complaint mechanisms for reporting cases of modern slavery. In fulfillment of this obligation, Deutsche Börse Group provides a standardized electronic whistleblower system to anonymously report known or suspected human rights or environmental related complaints. This system is open to both the public and to employees of companies in the Deutsche Börse Group.

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 and the access

code 5851. The automatic complaint intake via telephone is available in German, English and French.

In addition to this web-based and telephone whistleblower system, Deutsche Börse Group has also set up a functional email address (humanrightsofficer@deutscheboerse.com) through which human rights or environmental related complaints can be sent directly to the human rights officer.

Relevant cases that are reported to or discovered will be investigated on a case-by-case basis. As Eurex Frankfurt is a part of the Deutsche Börse Group, these processes apply to Eurex Frankfurt as well.

Appropriate corrective measures will be taken depending on the circumstances, including the severity and nature of the case, and mitigation/remediation efforts already put in place by the relevant supplier or/source of the potential modern slavery case. Corrective measures may include up to and including the termination of the business relationship with the supplier.

In addition to these corrective actions, a consultation process with suppliers is maintained to ensure transparency and cooperation. A designated supervisory function conducts regular assessments to verify compliance with the 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. Eurex Frankfurt have not identified substantiated cases of modern slavery in the reporting year and as such no corrective actions were required to be considered.

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 will cover the activities of Eurex Frankfurt AG and its subsidiaries.

The annual report is prepared by the CMF in coordination with the Human Rights Officer. This report 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.

Noting Eurex Frankfurt's historic global focus in relation to its approach to Modern Slavery, the major improvement made to its processes in the past financial year is its increased focus on modern slavery risks in its entire supply chain. It is expected that this increased focus will be a driver in additional improvements for this financial year.

6. Consultation

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

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

7. Approval and Signature

This statement was approved by the Management Board of Eurex Frankfurt AG on 10 December 2025.

Signed,

A handwritten signature in black ink, appearing to read 'M. Dannheimer', with a stylized, flowing script.

Melanie Dannheimer

Member of the Executive Board
Eurex Frankfurt AG