

part of eex group



GET Baltic Anti-Harassment Policy V1

23.10.2024

Vilnius

Ref. EEX Group Anti-Harassment Policy V1.4, 22.10.2024; DBG Anti-Harassment Policy V1.4, March 2024

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1 Purpose

At Deutsche Börse Group (DBG), we value and promote diversity and stand up against discrimination. As a global organization, we stand for recognition, appreciation and inclusion in the working environment, and advocate for and thrive through openness and fairness. We consider the wealth of backgrounds and ideas to be key to our success. To unlock the full potential of our diversity and ensure that everyone is treated with dignity, we will not tolerate any form of harassment in our working environment and between individuals.

DBG undertakes appropriate measures necessary to prevent occurrence of harassment. When informed of possible infringements, DBG will work towards resolving reported cases of harassment in a fair and unbiased manner and with the required confidentiality.

2 Scope

This is a Category 2 Policy with minimum requirements for working environment free from harassment.

This policy defines DBG's position of non-tolerance of any kind of harassment and provides for key standards in compliance with the Code of Business Conduct and the Diversity, Equity & Inclusion Policy and the different legal requirements applicable to DBG companies. Subject to respective applicable laws, DBG companies may have additional or more specific rules regarding Anti-Harassment, while the general frame provided by this policy is binding for all.

The first part of this policy determines the procedure if an individual is faced/confronted with moral or sexual harassment. In the second part, respective disciplinary actions in case of non-compliance with this policy are specified.

This policy applies to all DBG companies which have adopted this policy. All individuals within the respective DBG company must comply with this policy.

3 Definitions

3.1 Moral harassment

Moral harassment occurs when a person employed by one of the DBG companies commits repeated and/or deliberate actions towards another individual with the aim or effect of harming or jeopardizing open and confident working conditions and/or causing damage to physical or mental health of another individuals. The Actions can be (exemplary, not conclusive):

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- Offensive language, gossip, or slander;
- Posters, graffiti, obscene gestures;
- Abuse of internal e-mail systems, the internet or intranet;
- Pestering, spying, stalking;
- Persistent undermining of confidence, competence, and self-esteem
- Failing to acknowledge the rights or needs of people with different views or practices
- Undignified treatment or exclusion of people with disabilities or on the grounds of e.g., ethnicities, social origin, beliefs (e.g. Religious, political), sexual identities or -orientation, gender, (dis-)abilities, generations, or personalities

3.2 Sexual harassment

Sexual harassment is an unwanted conduct of sexual nature, or a conduct based on sex or sexual preference which is offensive to the recipient. Examples of inappropriate behavior and sexual harassment include:

- Unwanted physical assault or contact, including unnecessary touching;
- Suggestive remarks including propositions that sexual favors may further someone's career or that refusal may damage it;
- Display or circulation of pornographic materials;
- Derogatory remarks or conduct that insults or ridicules or is intimidating or physically abusive of an individual.

3.3 Persons of Trust

As Persons of Trust at DBG level this policy defines:

- Equal Opportunities Officers;
- A Member of Staff Representation of the relevant location, if applicable;
- A Member of the Human Resources (HR) Management Team;

- Any member of the Diversity, Equity & Inclusion Council.

As Persons of Trust at GET Baltic's (hereinafter referred to as Company) level this policy defines:

- Board members of the Company;
- CEO of the Company.

3.4 Individuals

As individuals this policy defines:

- Employees;
- Executives;
- Students;
- Interns;
- Apprentices;
- Service Providers.

4 Recommended procedure towards managing harassment

For ease of reference in the following descriptions, the policy will refer to the harassment victim as “the Individual”, and the person who is considered to be the perpetrator of the offense as “the Offender”.

4.1 Awareness

An Individual who believes that they have been subject to unwanted behavior / harassment is encouraged (if the situation permits it) to let the Offender know that their behavior is objectionable and ask for it to stop.

It is equally possible for the Individual to first discuss the situation with a Line Manager or a Person of Trust – see next step).

4.2 Contact Line Manager or a Person of Trust

If the Individual feels unable to address the Offender directly, the individual should seek assistance from the respective Line Manager (if not implicated in the offence) or a Person of Trust. The aim is to address and attempt to resolve the situation before it becomes necessary to raise a formal complaint. It is equally possible for the Individual to immediately raise a formal complaint.

The Individual's Line Manager and/or Person of Trust will ensure that any discussions will remain confidential and will not be divulged to a third party until the Individual will allow it.

4.3 Formal complaint

Regardless of the severity, the Individual may raise a formal complaint to a Person of Trust, in writing, stating the name of the Offender, the nature, dates and times of the harassment, names of witnesses (if possible) to any incidents of harassment, and any action already taken to stop the harassment.

4.4 Investigation

Person of trust entrusted with the case and the respective Line Manager of the Individual (if not implicated in the offence) will conduct a thorough, discreet, and impartial investigation without undue delay.

The observations and results of this investigation are reported to the Individual as promptly as possible. If seen as helpful or necessary, an external legal counsel could be involved. Should it be considered essential, others may be involved as witnesses, but generally only with the consent of the Individual bringing the complaint. The investigation will be conducted with all prudent steps to protect the Individual and the witnesses from any intimidation, victimization, or discrimination.

Pending the investigation and its results the Offender may be suspended. This decision will be taken by Person of Trust entrusted with the case. Where the investigation finds the allegations of the Individual are proven, it is treated as violation of labor discipline and respective responsibility could be applicable, including it into personnel file.

5 Document Basics

5.1. Change History

Version	Date	Reason for change	Changed section	Author
V1	24.10.2024	First publication	Standalone document based on 22.10.2024 EEX Group Anti-Harassment Policy 1.4, March 2024 DBG Anti-Harassment Policy V 1.4	Darius Sabonis

5.2. Approval and amendments

The Anti-Harassment Policy and it's material amendments is subject to GET Baltic's Management Board approval.