

Sustainable lobbying policy

As a leading financial markets infrastructure provider, Euronext believes it is its duty to be proactive and take part in the public decision-making process in the countries in which it operates as well as at the level of the European Union institutions. This is how we ensure awareness of the Group's activities and interests while respecting the legitimacy of other stakeholder representatives and the interests that they represent.

The Euronext Group Head of Regulation and Government Affairs establishes a list of persons within the Regulatory and Government Affairs team authorised to lobby as part of their formal professional duties and ensures they have the training and experience required to exercise such activity. Lobbying activity at European and national levels is also supported by Managing Board Members, including local CEOs, business representatives and other support functions, particularly for their strategic and technical expertise. All employees engaged in lobbying are made aware of the laws, codes of conduct and standards that apply to this activity in their locations. Employees engaged in lobbying must inform the Group Head of Regulation and Government Affairs should they encounter a real or potential conflict of interest situation that could influence or could be perceived as influencing the relationship between Euronext and public decision-makers involved in public policy.

The Euronext Group Head of Regulation and Government Affairs is responsible, alongside the Government Affairs team, for the management of lobbying activities, particularly the articulation of the Group's position externally and the design / execution of lobbying initiatives. In turn, this function is accountable to the Euronext General Counsel and Managing Board for the validation of lobbying strategy and plans, particularly in respect of those areas identified as priorities for the Group. In terms of the practical elements of this work, the Government Affairs team works closely with representatives from the businesses concerned to draft positions and design lobby initiatives. These are subject to sign-off by the Heads of Business and ultimately by the Managing Board. This structure is also used to frame engagement with, and contributions to, the trade associations of which Euronext is a member.

Euronext is, furthermore, committed to ensuring that all climate lobbying activities carried out in all its jurisdictions are aligned with the Paris Agreement's goal of restricting global temperature rise to 1.5°C above pre-industrial levels. The management system for our direct and indirect climate lobbying activities is overseen by the Chief Sustainability Officer. The Chief Sustainability Officer meets on an annual basis with the Group Head of Regulation and Government Affairs to align the climate policy advocacy priorities with our SBTi goals, in line with the Paris Agreement. Additionally, any new direct lobbying activity or flagged issue is promptly reported to the Chief Sustainability Officer and the ESG team for discussion.

With regard to indirect lobbying, Euronext regularly analyses whether all trade associations of which it is a member conduct climate lobbying that is in line with the Paris Agreement. In case of misalignment, Euronext will engage in conversations to clarify positions and understand if they can be changed. If the position cannot be changed, Euronext reserves the right to withdraw its membership.

We commit to respecting laws applicable to lobbying, as well as applicable codes of conduct and standards. Whenever they impose higher standards than those set out in this policy, they should always apply. If, by contrast, this policy provides for a higher standard, it should prevail, unless this results in illegal activity. Euronext abides by the [EU Transparency Register](#) Code of Conduct.

Euronext does not make any contributions to political parties, politicians or related institutions that collect political funds. Furthermore, we make sure our charity contributions and other philanthropic actions do not constitute “hidden” contributions. We respect Euronext’s bribery policy as disclosed in our Code of Business Ethics and Conduct, namely with regards to gifts and entertainment, in our relationship with public decision-makers.

We only communicate reliable, verifiable and up-to-date information and positions and, in particular, we abstain from communicating information to third parties and / or officials from public institutions that is deliberately misleading, or obtaining information through illegal means. We respect the independence of experts in order not to influence the integrity and objectivity of scientific opinions and do not engage in activities to induce public officials to contravene the rules of behaviour applicable to them. Whenever we use intermediaries, we communicate our responsible lobbying commitments to them and require them to respect them. In particular, these intermediaries need to clearly disclose that they represent Euronext’s interests.

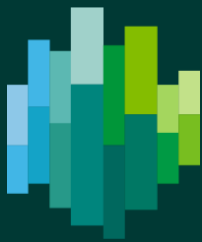
We support the adoption of lobbying best practices, in particular within the professional associations of which we are members. We reserve the right to express our dissent whenever we do not share the positions taken by these professional associations. We abstain from recruiting former public decision-makers before the end of applicable statutory periods or from retaining active public decision-makers to represent our interests and we respect their confidentiality obligations.

More information on our advocacy work at European level can be found on the [EU Transparency Register](#) and the Government Affairs [section](#) of the Euronext Group website. In particular, information is disclosed on: (i) the main EU legislative proposals and policies followed by Euronext, (ii) our contributions to public consultations and public position papers, (iii) Euronext participation in EU structures and platforms, (iv) Euronext memberships of associations and networks, and (iv) estimated level of resources dedicated to advocacy work.

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