

EURONEXT ESG POLICIES AND STATEMENTS

All the below [policies and statements](#) have been reviewed and approved by the Euronext [Managing Board](#). They cover all the companies controlled directly or indirectly by Euronext N.V.

Review by the Managing Board is done on a yearly basis. Most recent review dates from **27 March 2023**.

All Euronext Policies are reviewed by the Euronext Internal Audit department at least once every three years.

The objectivity and organisational independence of the Internal Audit function is achieved through the Head of Internal Audit reporting directly to the Chairman of Euronext Audit Committee.

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BUSINESS CONDUCT AND ETHICS

Euronext has adopted a [Code of Business Conduct and Ethics](#) that reaffirms Euronext Group's commitment to high standards of ethical conduct and reinforces our business ethics, policies and procedures. The Euronext NV Code of Business Conduct and Ethics forms the foundation for the conduct expected of every board member and employee, including contractors, consultants or interns. The Policy is maintained by the Head of Compliance for the Group, and is endorsed by the Managing Board. The Code of Business Conduct and Ethics is reviewed every three years by Euronext Internal Audit Department, which is an independent function.

ANTI-CORRUPTION, ANTI-FRAUD, ANTI-BRIBERY, GIFTS AND ENTERTAINMENT

Euronext has zero tolerance for bribery and corruption. It will always forgo business rather than pay bribes and fully supports its employees in this regard. Euronext further expects its partners and vendors to adhere to anti-corruption standards and have appropriate controls in place.

Euronext considers as "bribery" or "corruption" any offering or receiving of an advantage, whether in cash or in kind, by Euronext or by an intermediary appointed by Euronext, and with a corrupt intent. It does not matter whether the bribe is actually successful; the corrupt act of offering or receiving a bribe can be sufficient to establish the offence. All facilitation payments are prohibited.

The policies described in the Euronext NV [Code of Business Conduct and Ethics](#) as well as our [Anti-bribery](#) and [Anti-Fraud policies](#) serve to ensure compliance with applicable anti-corruption legislation.

Additionally, Euronext has established detailed procedures and monetary thresholds to govern the approval and [declaration of gifts](#), business meals and business entertainment. Reports and requests for approval of gifts, business meals and business entertainment are managed and assessed by the independent Compliance function.

ANTI-MONEY LAUNDERING AND TERRORISM FINANCING

In the geographies where Euronext conducts business activities, there are strict laws directed at preventing the use of the financial system for financial crimes, including money laundering, terrorist financing, violation of sanctions and bribery offences. Euronext is firmly committed to conducting business via its affiliates in full compliance with applicable anti-money laundering regulations in the countries where its affiliates operate, in order to prevent money laundering and terrorist financing and any activity that facilitates money laundering or the funding of terrorist activities.

The Company is also firmly committed to conducting business in full compliance with all applicable sanctions laws, including but not limited to the Common and Foreign Security Policy (CFSP) of the European Union and the prohibitions and restrictions mandated by the sanctions programmes administered by the United States.

The Euronext [Anti-Money Laundering and Terrorism Financing](#) Policy provides the framework for the organisation and its employees to tackle these issues.

COMPLIANCE FRAMEWORK

Euronext has a comprehensive framework that addresses relevant organisational compliance risks. The compliance governance, in line with the overall group governance, is organized based on the three lines of defense model.

The Managing Board is responsible for the effective management of the (compliance) risks. The Managing Board has the overall responsibility for the design and implementation of an effective risk management framework, including setting the boundaries of the risk appetite. Compliance risks are also specifically overseen by the Supervisory Board's Risk Committee. Euronext's senior management, led by its Managing Board, is accountable for identifying and assessing compliance risks and establishing policies, procedures and adequate controls in their respective areas of responsibility. Each Euronext employee is also ultimately responsible for addressing relevant compliance risks. Compliance with applicable rules, regulations, and ethical principles is key to Euronext's success and therefore every employee is called to support this effort.

The Board and senior management are in turn supported in their tasks by second line of defense functions, including Compliance, Internal Control and Risk Management.

To support the Managing Board and senior management in the governance and management of compliance risk, a Compliance Committee has been set up as a venue at executive level for information and decision making. The Compliance Committee is convened at least once per quarter and is mandated to discuss, review and advise on decision making in the following areas: (i) compliance strategy and appetite, (ii) compliance risk management cycle and (iii) compliance risk oversight.

The Compliance function acts as an independent guardian for identifying and managing compliance risks and setting adequate controls, and serves as an adviser to operating units in conducting Euronext's activities in a manner that complies with applicable laws and global standards. The role of Compliance is to establish and maintain a first class compliance culture within the Company and to ensure that Euronext's business approach is in line with the highest ethical standards. The Compliance function supports Euronext and its employees in complying with applicable laws and regulations and promotes ethical standards in accordance with excellent Corporate Governance. Amongst others, Compliance raises awareness among employees by articulating the responsibilities of the Company and its employees through policies and training, the monitoring of those policies, and serving as a point of contact for compliance matters for employees.

The Chief Risk and Compliance Officer is appointed by the Managing Board, reports to the Chief Executive Officer and has a line of communication to the Risk Committee of the Supervisory Board. This reporting structure provides the necessary independence of the Compliance department activities. Compliance Officers are located in countries where Euronext conducts its activities and operate under the leadership of the Head of Compliance. They are supported as necessary by local legal staff in order to benefit from the local expertise and knowledge of the local business and environment.

The Internal Audit department provides an independent and objective assurance on the organisation's governance, risk management and internal control as well as operational robustness of processes that is guided by a philosophy of adding value to improve the operations of the Euronext

Group. It has a risk-based approach with a specific attention on regulations, regulatory requirements as well as any specific applicable local laws and regulations. The objectivity and organisational independence of the Internal Audit function is achieved through the Head of Internal Audit not performing operational management functions and reporting directly to the Chairman of the Audit Committee.

ENTERPRISE RISK MANAGEMENT POLICY AND RISK APPETITE FRAMEWORK

Risk identifies the possibility that an unwanted event may occur, the consequences of which may be detrimental to staff, operations, business and objectives of the company and its reputation. Risk management seeks to identify, assess, and take corrective and/or mitigating actions when a risk is beyond Group risk appetite across the entirety of the Group's activities and businesses.

Group Risk Management is supported by the Group Enterprise Risk Management Policy and the Group Risk Appetite Framework (including outlining the roles and responsibilities, a governance model, risk management processes, a risk classification system and a definition of risk appetite). These documents are reviewed and approved by the Managing and Supervisory Board Risk Committee of the Group on an annual basis.

Group Risk Appetite is the type and amount of risk, broadly that the Group is willing to accept to achieve its strategic objectives.

The Enterprise Risk Management (ERM) process consists of five steps: identification, notification, assessment, management and reporting of risks. Risk classification seeks to achieve two objectives: firstly, to create a uniform language to examine risks; secondly, allow newly identified risks to be assigned to an appropriate category for assessment, measurement, and monitoring.

All departments and employees must perform risk management, record risks in the designated risk management tool and, when necessary, implement mitigating actions in accordance with the Group's Risk Appetite Statement. The Group has adopted a 'Three Lines of Defense' model for RM in line with the generally accepted best practice in the financial sector.

Please refer to Section 2.3 Control Framework of the [Group Universal Registration Document](#) for details on the Three Lines of Defense, Risk Process and Risk Appetite.

HUMAN RIGHTS

Our ambition: Euronext is committed to conducting its business in accordance with the International Bill of Human Rights (which includes the Universal Declaration of Human Rights (UDHR)) and we also take into account the United Nations framework and guiding principles on business and human rights, as well as the International Labor Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

As part of its Sustainability strategy, Euronext considers that it is its role to monitor the respect of human rights within its supply chain and its workforce.

As an employer, Euronext is committed to respecting and promoting the human rights of all employees and contractors and all its workforce more globally. In practice, Euronext ensures

notably that it prohibits any form of discrimination, respects the right of association, recognises collective agreements, ensure to eliminate all forms of forced labour and child labour.

Euronext is particularly committed to social dialogue, supporting unions representation rights and facilitating worker representation bodies. Euronext is also committed to respecting the right to collective bargaining, in accordance with local laws of the countries where its employees are located. Euronext does not interfere with the activities of those organisations as we consider them to be extremely important to promote a social dialogue between representatives of management and employees. Euronext is convinced that employees that join unions or representative bodies can play an active role in improving their workplace and have a positive impact on work conditions. Protecting this aspect of workers' fundamental rights is essential and is part of Euronext's sustainable goals. Euronext is committed to comply with the International Labor Organisation (ILO) principles that ensure freedom of association and with local laws where our employees are located

With our suppliers, we consider that our role is to monitor the respect of human rights within its supply chain. In this regard, we have issued a [Supplier Code of Conduct](#) which ensures that our suppliers respect human rights in their operations. These behaviours and practices include: health and safety, avoidance of any form of forced labor, avoidance of child labor, working hours, wages and benefits, freedom of association, privacy protection and treating people with dignity.

As a financial markets infrastructure, we believe that financial crimes can often be associated with human rights violations. Financial crime, bribery and corruption have a detrimental effect on the communities where they occur by undermining the rule of law, democratic processes and basic human freedoms, impoverishing states and distorting free trade and competition. Euronext's role as a global financial markets infrastructure is to fight financial crime and prevent its systems, services and operations from being used for financial crime. We do not wish to be associated with any human rights abuses in our business dealings with clients. If a customer fails to address identified human rights violations or any other items cover in our Supplier Code of Conduct, Euronext will terminate its business relationship with that client.

Implementation plan: Euronext has implemented policies that aim at ensuring directly or indirectly the respect of human rights at Euronext and to reduce financial crimes, bribery and conflicts of interest. Among them, one can find our [Supplier Code of Conduct](#), [Euronext's Code of Business Conduct and Ethics](#) etc. To ensure adherence to its regulatory framework, Euronext conducts ongoing assessments and has established a whistleblowing policy to encourage reporting of any concerns.

DIVERSITY, INCLUSION AND ANTI-DISCRIMINATION

Our ambition: The federal governance model remains central to Euronext's organisation and naturally creates an environment where people of diverse cultures and backgrounds collaborate and drive the organisation forward. Diversity at Euronext includes gender, ethnicity, religion, sexual orientation, age, language, socioeconomic status, physical ability, experience and education, and more broadly all forms of diversity. Diversity and Inclusion are embraced in every area of Euronext's people agenda.

Euronext also reaffirms its commitment to strictly prohibit any diversity related type of discrimination in hiring, promotion, salaries and benefits and career evolution, in line with its anti-

discrimination policy. It applies specifically to any gender-based type of discrimination or any other forms of diversity. Euronext is also committed to prevent any form of harassment from happening in its workplaces between employees. All countries are equipped, according to their local regulations, with appropriate grievance escalation and investigation processes, notably through our group whistleblowing policy and process, and through appropriate training of employees and managers.

[Euronext diversity, inclusion and anti-discrimination policy](#) was validated by the Managing Board in 2018 and is available to download on our [website](#).

Implementation plan: Euronext Diversity, Inclusion and anti-discrimination policy is implemented and facilitated by the Head of Diversity & Inclusion working very closely with the Group Head of ESG and supported by all local HR teams and by a network of volunteers from all our locations designated as D&I champions.

TALENT ACQUISITION & DEVELOPMENT

Our ambition: Attracting, retaining and nurturing high quality talent is fundamental to delivering Euronext 'strategic plans. Its people are at the core of Euronext's business with both its customers and stakeholders benefiting from the expertise, commitment and innovation Euronext employees bring.

Euronext Talent Acquisition policy aims to hire the best talents at the right role, the right place and the right moment in order to achieve the Euronext ambitions. Any form of discrimination as part of our recruitment activities is strictly prohibited.

Euronext is also committed to build a comprehensive Talent Development approach for employees to shape the future for Euronext and for themselves. Euronext is committed to train its employees and develop their skills in order to ease their adaptation to Euronext technical and organisational changes.

Implementation plan: Euronext is equipped by a wide set of policies and processes to ensure its workforce can onboard efficiently, grow fast, develop expertise, always benefiting from our federal model and its wide diversity of roles to grow their career, while being strongly committed to being an equal opportunity employer.

- As such, our Talent Acquisition policy helps Euronext management to ensure they make strategic recruitment decisions, conduct recruitment in a time efficient, cost effective, fair and transparent way and operates in accordance with all legal requirements and best practice. At all stages of the recruitment process, Euronext will endeavor not to discriminate.
- Euronext is committed to support employees' career development. Outside of internal mobility, employees also have the opportunity to grow in their job through new projects, enlarged scope of the Group, various international mobility frames leveraging on the variety of cultures and expertise across our locations, innovation workshops, and exposure to new products and technologies. Euronext develops and runs specific initiatives to support professional development: career framework, talent reviews and succession plans on all senior positions, and workforce planning process.

- Euronext has developed a wide range of learning resources and formats to encourage employees to proactively learn in the way that best suits them. All employees have access to the Euronext Academy, the Group's e-learning platform, gathering training courses built by internal and external experts. Key development initiatives also include on-site training, coaching and mentoring programmes. Employees are also invited to join Learning Weeks and business knowledge sessions to learn about capital markets and new technologies trends amongst others.

PERFORMANCE MANAGEMENT & REMUNERATION

Our ambition: Euronext's Performance and Development policy and processes aim to strengthen the performance culture, develop the skills and talent pipeline of the company, and recognize the contributions of each employee.

Euronext aims to ensure competitive and fair compensation, with a significant variable component, fostering new initiatives, growth and sustainable performance. Euronext is committed to pay salaries aligned to comparable industries to maintain market competitiveness and ensuring decent living wages to all our employees. Euronext complies at least with minimum wages state by Law or collective bargaining agreement where applicable.

Leveraging on its unique federal model Euronext is committed to have strong decision-making process when taking any compensation related decision, ensuring to have several validations levels between country and functional reporting lines.

Implementation plan:

- Performance
 - A culture of continuous feedback exists within the Group, encouraging managers and employees to have regular discussions on performance and development.
 - The annual appraisal process, which brings formalised milestones to this continuous feedback culture, is rolled out each year, with a self-assessment period, followed by an annual appraisal meeting, setting of new objectives and mid-year reviews. Each meeting is the opportunity to address performance objectives, career opportunities, training and development needs and ways of working.
 - Euronext objectives framework is structured so that all employees have objectives aligned with the strategic plan.
- Remuneration:
 - The Company provides a competitive annual fixed salary in line with market standards, short term incentive to reward performance, and long-term incentive for some retention situations, in the form of a Performance Shares reward to align the interests of Euronext employees, with those of the company and long-term shareholders. All employees are eligible for local benefits programs.
 - Each Euronext employee also has access to a share ownership program, with an annual grant of Performance Shares since 2020, reinforcing the message that each

member of the team is co-owner of Euronext's business objectives, working together to grow Euronext in ambition, impact and profitability.

HEALTH, SAFETY & WAYS OF WORKING

Our ambition: Euronext's purpose is to shape capital markets for future generations. What makes Euronext special is its role in supporting the financial ecosystem, its state-of-the-art technology, but also its unique and talented multicultural teams, living out the Group's values of Unity, Agility, Energy, Integrity and Accountability. Euronext always looks to improve its health and safety measures, adapting them to a changing world.

The Company is committed to providing all employees and others who are on Company property, with a safe and healthy work environment. Accordingly, all employees comply with all health and safety laws and regulations as well as Company policies governing health and safety.

As a socially responsible company, Euronext is committed to providing its employees with a healthy work environment where their mental and emotional well-being is respected. Euronext ensures to offer workplace conditions and ways of working that favor strong collaboration capacity, fostering the best working environment for performance and innovation.

Implementation plan:

Health and Safety

Euronext ensures to provide a working environment that complies with the latest requirements and that all our buildings and workplace infrastructure are maintained in a safe condition. We also appoint and train people on local regulations, to take on special health and safety responsibilities, such as first responders, facilities teams, and where applicable security officers.

All employees and managers are responsible for immediately reporting accidents, injuries and unsafe equipment, practices or conditions to a designated person. Monitoring of those accidents allows to prevent any re-occurrence. Furthermore, our Euronext's business activity prevents us its employees from being exposed to major physical occupational risk.

Euronext aims at improving the health and well-being of employees at work. These initiatives aim to help employees build resilience and preserve their physical and mental health.

Monitoring of absenteeism supports Euronext to ensure of the concrete results of its Health & Safety policies.

Ways of working

Euronext proposes various flexible working schemes to adapt to all stages of life and prohibiting any diversity related form of discrimination. Euronext proposes the possibility to work from home on a voluntary basis, up to 2 days per week on average. In line with its federal model and matrix organisation, the remote working possibilities may vary according to locations and functions. Euronext remains convinced that office-based work is still useful in order to reinforce team work, innovation and creativity, even more in a period of integration and change.

Flexible working hours and/or part-time options are also offered to staff, where possible and depending on local regulations, and within the context of each role to accommodate employees to best perform their role considering individual circumstances.

Euronext ensures to dedicate specific measures to all care givers and notably for employees in their parental role. Euronext is committed to enable all its employees to care for and bond with a new-born or a newly adopted child and as such respects and encourages parental leave in each location in conformance with local regulations.

WORKPLACE ANTI-HARASSMENT

Our ambition: Euronext is committed to a work environment in which all individual employees are treated with respect and dignity. Euronext does not tolerate any harassment and will take immediate and appropriate action upon becoming aware of such cases.

All employees are required to take personal and individual responsibility to comply with Euronext policies and behave in a non-discriminatory way and not to participate in any acts of inappropriate behaviour, harassment or bullying.

Implementation plan: Euronext is aware of the adverse effects that harassment in the workplace can have on its employees. Section 2.9 of our [Code of Business Conduct and Ethics](#) aims to clarify Euronext's position and commitment with respect to harassment in the workplace. Together with the employee handbooks provided to each new joiner, it provides clear rules of engagement. Euronext's Anti-Harassment policy prohibits all forms of harassment, whether based on race, ethnicity, religion, gender, nationality, sexual orientation, age or any form of disability.

Euronext staff receives regular training on Bias and Discrimination topics.

ANTI-SLAVERY

Euronext is committed to ensuring all Group entities operate in a consistent and effective way with regard to modern slavery and human trafficking risk. Human rights are universal. This means that every person around the world deserves to be treated with dignity and equally. Organisations have a duty to protect individuals against human rights abuses. The UN Guiding Principles for Business and Human Rights also outline the responsibility of businesses to respect human rights.

Euronext plays a vital economic and social role in enabling companies to access funds for growth and development. As such, integrity, and trust in our markets, and in Euronext, are at the core of what we do. We have a very clear view of modern slavery: we regard all forms of modern slavery and human trafficking as a crime and a violation of fundamental human rights. They are fundamentally at odds with our own corporate values. We are committed to implementing and promoting practices which combat modern slavery in all its forms.

Our risk assessment indicates that Euronext operates in an industry where the risk of modern slavery and human trafficking is inherently low. However, we operate as a global business and acknowledge the complex nature of supply chains. We recognize the risks of partnering with a varied spectrum of global suppliers and the possibility of modern slavery occurring deeper in those complex supply chains

Euronext completes a risk assessment on all new suppliers prior to onboarding, as required by [Euronext's Supplier Code of Conduct](#) through Know Your Customer (KYC) checks. In depth due diligence is conducted for critical vendors, outsourcing providers and in full RFP processes. Furthermore, our suppliers and service providers are bound by our Supplier Code of Conduct which

contains requirements pertaining to economic sustainability, environmental protection as well as social and ethical responsibility.

Additionally, Euronext continues to expect its suppliers to have in place internal measures to ensure modern slavery is not taking place within its business or supply chain. Euronext will not knowingly support and/or do business with any suppliers who are involved in slavery. In case of non-compliance with our code of conduct or violations revealed by our evaluation process, we reserve the right to take appropriate measures, including the termination of business relationships.

SUSTAINABILITY

Euronext's ambition is to become a major player in promoting a sustainable economy. To achieve this goal, the group must equip itself with the appropriate governance, strategy and resources. In addition, Euronext must ensure that all its employees and executives are constantly trained in sustainability issues and understand the various regulatory, scientific, economic and social developments surrounding these topics. In order for the group to adopt and maintain a business practice consistent with its ambition, Euronext is committed to the following rules:

- **Governance:** The Managing Board and the Supervisory Board have fully endorsed ESG as core of the "Growth for Impact 2024" strategic plan of Euronext. With the help of the Group Head of ESG, the General Counsel, part of the Group's Extended Managing Board, is in charge of coordinating ESG at the Group level, making sure that all relevant departments integrate the ESG objectives into their missions. The General Counsel ensures that ESG initiatives, impacts and challenges are high on the agenda of the Group's Managing Board and Supervisory Board, and that the company reports on ESG related topics in a transparent way. Members of the Supervisory Board and Managing Board are regularly trained to ESG topics to make sure they understand and embrace the new challenges as well as the consequences of the ongoing climate crisis.
- **Internal audit:** All audits conducted by the internal audit team integrate an ESG section, ensuring that ESG is questioned for every dimension of our business and organisation.
- **Strategy:** The Group has a clear sustainability strategy plan with precise objectives, approved by the Managing Board and Supervisory Board. The strategy is monitored on a frequent basis through key performance indicators and metrics. The group's sustainability strategy is reassessed on a regular basis to ensure that it remains aligned with the group's ambition and takes into account new developments around material sustainability-related topics that could affect Euronext's activities and stakeholders.
- **Materiality assessment:** Euronext's approach to sustainability is based on material issues for the group and its stakeholders. Euronext frequently reviews its materiality matrix by analyzing the evolution over time of sustainability issues and potentially affected stakeholders. The materiality assessment of Euronext can be found on the URD.
- **Sustainability risk management:** Sustainability risks are integrated into Euronext's risk analysis framework. The objective is to ensure that Euronext's sustainability risks are appropriately identified and that relevant controls are in place to reduce or manage them in accordance with the group's appropriate risk level. A Head of ESG risk for the group was appointed in January 2023.

- **Employees:** All Euronext employees are regularly trained on sustainability topics so that they can better integrate sustainability factors into their work. In addition, all employees have an ESG objective, related to their work and skills, set as part of the annual objective setting exercise. Part of the variable remuneration of senior managers is connected to the delivery of this ESG objective.
- **Legal:** Euronext ensures that its sustainability approach complies with relevant international frameworks and standards such as the UN Sustainable Development Goals (SDGs), the UN Global Compact Principles, and the OECD Guidelines for Multinational Enterprises. In addition, Euronext is compliant with all local sustainability-related rules in the countries where it operates.
- **Reporting:** Euronext publicly discloses at least once a year the group's sustainability performance, in a fair, accurate and transparent manner. These disclosures include the non-financial report included in the [Universal Register Document](#) (URD) and [TCFD Report](#). Euronext ESG Statements and Policies are available on Euronext website and reviewed at least once a year by the Managing Board of Euronext. In addition to the audit on financial statements, an external audit firm reviews and provides external reasonable assurance by an independent auditor on the non-financial information published as part of the URD.
- **Encouraging Corporate Social Responsibility Participation:** Euronext supports community activities that have a direct, positive and measurable impact and that are aligned to our corporate values. Through training, volunteering, charitable activities and thought leadership, Euronext employees can contribute in three main areas that are relevant to our business: financial literacy, Diversity & Inclusion in Finance and ocean protection. Different frameworks enable them to do so:
 - A policy of two volunteering day per year policy, allowing employees to engage in initiatives and associations supported by Euronext
 - Euronext's sponsorship of employees charity missions undertaken globally with Planète Urgence
 - Possibility for all employees to join Euronext ESG Champions and Euronext Diversity & Inclusion networks of volunteers and play a concrete role in shaping the group's strategy
 - Possibility to be a mentor or professor in one the many financial literacy initiatives supported by Euronext, including the Euronext Blue Challenge organized in partnership with JA Europe.

SUSTAINABLE MARKETING & EVENTS

Euronext follows a responsible Events and Marketing policy. Our teams ensure we are not only meeting customers' needs but also having a positive impact on them and the community we are all part of. We work to provide business value and, at the same time, social and environmental value.

Events

Euronext has replaced many physical events with virtual events. Where physical events are maintained, we advise guests to use green or public transport, and we are gradually moving some of our main events to locations that imply less travelling from our target participants. We also try, when relevant, to favour attendance of local Euronext representatives at local events instead of sending colleagues from abroad, so that we can limit the carbon footprint generated by travel.

Since the beginning of 2023, we have prioritised gender diversity on panels at events organised by Euronext.

Catering

Euronext has banned plastic utensils and plastic tableware for catering purposes. We no longer serve red meat at events, and whenever possible we give preference to seasonable fruit and vegetables, coming from local providers. Whenever possible, water refill fountains are made available during events. We try to provide accurate estimates of numbers of participants, to manage quantities, and we challenge our suppliers to have “refood” policies, to avoid food waste.

Our providers are selected based on their own responsible policies. They cannot act as our partners without having signed the [Euronext Supplier Code of Conduct](#).

Stewards & hostesses

Stewards and hostesses are hired to represent the company, to welcome and give information to the public present, mainly dealing with the reception, support and assistance during the event itself. In this role, they represent one of the main faces of the brand.

In the past, this role was often associated with a stereotyped gender and physical appearance. Our providers are now required to offer a gender-balanced and inclusive portfolio of collaborators.

Goodies

Euronext has been progressively reducing the number of corporate gifts, or ‘goodies’, produced. The new policy, announced beginning of 2023, is “No goodies, or responsible goodies only”. By responsible goodies, we mean gifts that are useful, are produced responsibly, privileging recycled and sustainable materials, and are preferably produced locally.

To improve the application of this policy across all the Euronext geographies, we will launch in H2 2023 an ESG Goodies Platform, which will hold a library of goodies that are considered responsible. This will allow us to apply rigorous centralised stock management, reducing waste and ensuring consistency in the application of our policy.

Marketing materials

If booths are needed at events, Euronext reuses materials or uses recycled materials wherever possible. We have limited the production of non-reusable equipment for events.

We avoid printing. Whenever possible, brochures, flyers, or support presentations are made available via a QR code so our target audience can download and read them on their electronic devices. Generally, information is published online instead of in printed brochures. We always try to reuse marketing materials, avoiding producing printed marketing materials related to a specific event only and instead producing generic corporate marketing material if necessary.

We no longer opt for hand-outs in event sponsorships, whether marketing literature or goodies. In terms of client gifts, goodies or event equipment such as pull-up banners, we try to source local suppliers as much as possible in order to limit the environmental impact of transportation to different countries.

Partnerships

Euronext has included ESG content in its pre-IPO programmes and regularly organises events on ESG for our issuers and prospects. When possible, ESG-related topics are also covered by partners participating in our annual Listing partnerships with the ecosystem. We organise dedicated events/initiatives to clarify and contribute to the financing of the cleantech industry.

Euronext offers new listed companies the option of making a charity donation on the occasion of their listing Bell ceremony.

Data privacy

Euronext is strongly committed to protecting the privacy of all the individuals from whom it collects personal data (ie: its stakeholders, such as employees, clients, customers, prospects, partners, or investors) and upholding their right to privacy. We are transparent on how we collect and process personal data and we provide an overview of data subjects' rights in relation to personal data as well as how to exercise them. The usage of this data for marketing purposes is transparent and our target audience is able to opt in and/or opt out at any moment. More information: Read Euronext's [Privacy Statement](#) for external parties.

SUSTAINABLE LOBBYING

Euronext, as a leading financial markets infrastructure provider, 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 authorized to lobby as part of their formal professional duties and ensures they have the training and experience required to exercise such activity. Lobbying activity is also supported by Managing Board Members, 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.

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 namely 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 Conducts](#), 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 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. Whenever we use intermediaries, we communicate our responsible lobbying commitments to them and require them to respect them. In particular, they 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 to retain active public decision-makers to represent our interests.

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 maintained on: (i) the main EU legislative proposals or 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.

ENVIRONMENTAL

The world is facing significant challenges in ensuring a sustainable future for our people and our planet. Global warming and its consequences is indisputably one of these challenges. Every organisation will have to play its own role. As a global market infrastructure, our commitment is to protect and uphold environmental stability, prevent climate change and conserve natural resources. In addition to our compliance with the relevant environmental legislation, this Statement provides guidance on our actions and measures taken to improve our environmental performance.

Fit for 1.5° is Euronext’s commitment to developing services and products that help its business, partners, clients and the European economy in general to curb the increase in global temperatures from pre-industrial times. The company’s goal is to help ensure this increase remains below the 1.5°C target, as set out in the Paris Agreement. Our climate strategy stands at the very centre of our endeavours. We offer a wide range of products that support our clients to manage their own sustainable transformation.

We have also committed ourselves on a 1.5° trajectory, validated by the SBTi. Details on our SBTi commitments and strategy can be found on our [website](#).

Our progress in our climate strategy are reflected in our yearly [Universal Registration Document](#) and audited with reasonable assurance by an independent auditor.

Climate-related factors are consequently reflected in our overall Risk Management approach and governance. To this end, we follow the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and publish each year a [TCFD report](#), which comprises our risk governance and our reporting on our climate-related opportunities and risks accordingly.

To further calibrate our efforts for environmental protection we continuously identify and assess the expectations and requirements of relevant internal and external stakeholders and have our corporate ESG profile evaluated by the most relevant ESG rating agencies to gain an immediate and permanent feedback from our stakeholders and capital market participants.

We foster dialogue and awareness on sustainability issues and our climate strategy among our workforce. This involves trainings on sustainability for our employees. Our senior management supports these initiatives and is closely involved in awareness campaigns for environmental matters. All employees have at least one ESG objective. Moreover, we incentivise our senior management by linking 10% of their variable remuneration to ESG-factors.

In addition, Euronext has identified specific UN Sustainable Development Goals (SDGs) to measure the impact of its ESG programme. This includes a particular focus on Climate Change (SDG 13) and Life below water (SDG 14).

PERSONAL DATA PROTECTION

Euronext is committed to protecting personal data and respecting the right to privacy as set out in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("GDPR") and all national laws and regulations implementing the GDPR and other data privacy laws applicable to Euronext companies. In this context, Euronext has adopted a set of internal policies and procedures and has published or disseminated a number of information notices to data subjects:

- Internal documentation, part of which is under the direct responsibility of the Data Protection Officer (DPO) and other parts under the direction of other departments but which may have an impact on the processing of personal data within the company:
 - Data Privacy Policy (DPO)
 - Data retention policy (Data Management Office)
 - Data Classification Standard (Infosec)
 - Corporate Standard and Procedure for the management of personal data breach
 - Corporate Standard and Procedure for consent and data subject rights
 - Privacy by design and data protection impact assessment procedure.
- Information notices for data subjects:
 - Information notice for employees
 - Information notice for corporate officers
 - [Privacy Statement](#)

- Information procedure relating to the exercise of the rights of the persons concerned.

All of this documentation is distributed to employees through general training designed specifically by and for Euronext, as well as through in-depth training for specific functions that are more exposed to risk. Staff training and awareness sessions are regularly organised within the company to promote compliance with our data privacy laws and internal processes. Each new employee is trained shortly after joining the company. All newly acquired companies are also integrated into these processes. This global training is carried out through an online training platform, Euronext Academy, which keeps track of training completion by employees. Other more specific awareness/training campaigns are carried out in parallel, either physically (with the signing of an attendance sheet), or by means of distribution by e-mail or publication on the company intranet on more specific subjects or in greater depth due to a particular risk exposure.

Finally, Euronext maintains all the organisational and technical measures put in place to ensure the protection of privacy. Amongst all these organisational measures, we can highlight

- - The use of an IT tool dedicated to the GDPR, which allows for automation of the processing register
 - The use of an IT tool for monitoring and risk assessment of personal data breaches
 - The completion of Data Protection Impact Assessments (DPIA) (carried out for any new project or supplier)
 - The appointment of "Business Data Owners" within each department whose role is to ensure the link between the department concerned and the Data Protection Officer (DPO) on the one hand and InfoSec and the Data Management Office on the other,
 - The implementation of several tools by the InfoSec department to classify or control access to data

Since 2020, Euronext has run a monitoring programme to monitor GDPR compliance as well as the respect of measures implemented internally by tools or departments. Following these checks, remedial measures are proposed and their implementation is monitored. Since 2022 a similar monitoring programme has been introduced for companies outside the group that process personal data on behalf of Euronext. At the end of this monitoring, a report is sent to the Risk and Compliance Department and to the departments using the services of the third-party companies concerned in the event of identified risks.

PROCUREMENT & SUPPLY CHAIN

Euronext plays a vital economic and social role in enabling companies to access capital for growth and development. As such, maintaining integrity and trust in our markets, and across Euronext Group, are at the core of what we do.

A significant proportion of Euronext's cost base is comprised of expense incurred with third parties. These suppliers provide a range of physical goods and services to us, from everyday commodities to critical market facing services, professional consulting, data, IT hardware, networking and software applications.

These trusted relationships with our suppliers are an important component in maintaining our unique role at the heart of the world's financial community. We have a responsibility to ensure that our selection process for suppliers, and oversight of the manner in which they do business, are a positive reflection on both our brand and corporate values and enables us to comply with our external obligations to regulators as well as to our customers.

The [Euronext Supplier Code of Conduct](#) sets forth the standards and practices we expect our suppliers to uphold, wherever they are in the world. This Code outlines our expectations for suppliers we do business with. We are committed to supporting our suppliers in this respect, including working together to improve the supplier's ability to meet these expectations.

Euronext's key principles include:

- to comply with all applicable laws and regulations of the countries in which it operates;
- to support and respect the protection of internationally proclaimed human rights;
- not to be complicit in human rights abuses;
- to uphold the freedom of association and the effective recognition of the right to collective bargaining;
- not to make use of any forms of forced and compulsory labour or child labour;
- to prevent discrimination in respect of employment and occupation; ▪ to support a precautionary approach to environmental challenges;
- to undertake initiatives to promote greater environmental responsibility;
- to encourage the development and diffusion of environmentally friendly technologies;
- to work against corruption in all its forms, including extortion and bribery. Euronext makes these principles key drivers of its purchasing policy.

Failure to comply with these standards, or with applicable laws, and regulation may result in termination as a Euronext supplier, where this right has been contractually agreed in advance by both parties, and referral of the matter to local authorities.

As part of its SBT 1.5° commitment, Euronext committed to having 72% of its suppliers by emissions covering purchased goods and services to set science based targets by 2027. To reach this objective, Euronext's procurement teams educate and support their supply-chain in their ESG journey.

TAX

Euronext is a company that places great importance on adhering to regulatory compliance in its tax strategy. As a global organisation, it operates in various countries and territories and ensures compliance with relevant tax laws and regulations. [Euronext's Global Tax Policy](#) describes the company's tax framework.

The CFO, with support from the Group Finance Director, oversees the tax strategy and function. The company regularly engages with tax authorities to ensure adherence to relevant tax laws and regulations. Our tax function oversees our day to day responsibility for tax and ensures tax compliance.

To ensure adherence to its regulatory framework, Euronext conducts periodic internal assessments and has established a whistleblowing policy to encourage reporting of any concerns.

MISCONDUCT REPORTING & HANDLING

Via its [Whistleblowing Policy and Procedure](#), Euronext allows employees and third parties to report in confidence alleged breaches of the laws or Company policies, and protects anyone who reports in good faith, ensuring that they shall in no way be put at a disadvantage by the Company as a result of the report. The policy provides internal and external mechanisms to report unlawful and unethical behaviours.

The internal mechanism allows employees to report alleged breaches either to the Compliance department or directly to the management or to the Chairman of the Supervisory Board under specific circumstances.

The external mechanism is managed by the Compliance department via the internet by a specialized provider and allows anonymous reporting by employees.

The Whistleblower Policy is available on the Euronext Website for external contacts and on the Euronext Intranet in the main languages used in the company for employees. Employees participate in mandatory training sessions, primarily through Euronext's e-learning platform and are informed of the mechanisms for reporting unlawful and unethical acts and behaviours.