

Document title

# **CODE OF BUSINESS CONDUCT AND ETHICS**

To all Employees and Board Members,

Euronext N.V. has adopted a Code of Business Conduct and Ethics that reaffirms Euronext N.V.'s commitment to high standards of ethical conduct and reinforces our business ethics, policies and procedures.

Please review the Code of Business Conduct and Ethics and ensure that you and those around you comply with its provisions.

The Managing Board

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## DOCUMENT SUMMARY

<b>Document type</b>		Code of Business Conduct and Ethics
<b>Purpose of the document</b>		This Code reaffirms Euronext N.V.'s commitment to high standards of ethical conduct and reinforces its business ethics, policies and procedures.
<b>Target Audience</b>		All staff
<b>Classification</b>		Public
<b>RACI</b>	<b>Responsible / Document owner</b>	Euronext N.V. Managing Board
	<b>Accountable</b>	Group Compliance
	<b>Consulted</b>	Local Compliance officers, Legal, HR, DPO
	<b>Informed</b>	All staff
<b>Reference to related documentation</b>		<p>For many topics covered in the Code, more specific requirements can be found in other detailed corporate policies, procedures, and guidelines.</p> <ul style="list-style-type: none"> <li>▪ Anti-bribery Policy</li> <li>▪ Whistleblower policy</li> <li>▪ Euronext Confidential and Insider Information Policy</li> <li>▪ Cyber and information security policy</li> <li>▪ Policy preventing insider trading on Euronext NV Financial instruments</li> <li>▪ Anti-money laundering and sanctions Policy</li> <li>▪ Conflict of interest policy</li> <li>▪ Travel policy</li> <li>▪ Gifts, Business Meals and Business Entertainment Policy</li> </ul>
<b>Regulations linked to this document</b>		<ul style="list-style-type: none"> <li>▪ OECD Guidelines for Multinational Enterprises</li> <li>▪ OECD Anti-Bribery Convention (1997)</li> <li>▪ International Labour Organization (ILO) Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy</li> <li>▪ United Nations Convention Against Corruption (UNCAC), United Nations Guiding Principles on Business and Human Rights</li> <li>▪ ISO 26000: Guidance on Social Responsibility</li> <li>▪ Whistleblower Protection Directive (EU) 2019/1937</li> <li>▪ Anti-money laundering Regulation (EU) 2024/1627, EU, US and UN Sanctions programmes</li> <li>▪ Other applicable local regulations.</li> </ul>

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**VERSION CONTROL**

<b>REVISION NO./ VERSION NO.</b>	<b>DATE</b>	<b>AUTHOR</b>	<b>APPROVAL</b>	<b>CHANGE DESCRIPTION</b>
4.0	27.12.2021	Compliance department	Euronext N.V. Managing Board	Annual policy update 2021
5.0	17.08.2023	Compliance department	Euronext N.V. Managing Board	Update 2023
6.0	16-10-2024	Compliance department	Euronext N.V. Managing Board	Update regarding ESG topics
7.0	04-11-2025	Compliance department	Euronext N.V. Managing Board	Update regarding ICT Security

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## 1. OBJECTIVES, OWNERSHIP AND GOVERNANCE

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### 1.1 OBJECTIVES

#### **Background**

Because any illegal or unethical action, or the appearance of misconduct or impropriety is unacceptable, Euronext N.V. has adopted this Code of Business Conduct and Ethics.

#### **Objectives**

This Code of Business Conduct and Ethics reaffirms Euronext N.V.'s commitment to high standards of ethical conduct and to further strengthens our business ethics, policies and procedures.

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### 1.2 SCOPE AND OWNERSHIP

#### **Scope**

This **Code of Business Conduct and Ethics** (the "Code") applies to Euronext N.V. and all subsidiaries and entities controlled by it (collectively, the "Company") and the Company's Board members, and employees<sup>1</sup>. Compliance with the Code is required of all Board members (Managing Board, Supervisory Board and any other Board<sup>2</sup>) and all employees including consultants, contractors, temporary employees (e.g. interns), VIEs<sup>3</sup>, and other personnel working for or on behalf of the Company. Any illegal or unethical action, or even the appearance of misconduct or impropriety by anyone acting on the Company's behalf is unacceptable, therefore the Code should also be followed by the Company's agents and representatives.

However, the Code is not intended to be a comprehensive manual that covers every situation that employees and Board members might encounter. In many cases, more specific requirements are contained in the various corporate policies, procedures, and guidelines, notwithstanding the foregoing, to the extent of any conflict between the Company's corporate policies, procedures, and guidelines in existence on the date hereof and this Code, the more restrictive terms shall govern. In addition, this Code and the Company's corporate policies can be supported by local Codes of conduct, local policies and/or policies that specify local or entity specific requirements or regulation. These local policies or procedures could include decisions and authority attributed to specific committees or groups and local CEOs by the Managing Board, Local Board of directors or CEOs.

#### **Ownership**

The Managing Board is responsible for ensuring that this Code and the Company's corporate policies will govern, without exception, all business activities of the Company. Compliance is responsible for maintaining the Code. The Code should be reviewed on an annual basis and updated based on requirements from Euronext group. Compliance is also responsible for securing the proper approval from the Managing Board and local Boards, where applicable.

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<sup>1</sup> The standards in this Code are not applicable to our Listing/Membership application process and other Third-Party requirements.

<sup>2</sup> Including to the Board of Statutory Auditors of Italian Companies.

<sup>3</sup> VIEs (in French *Volontariat International en Entreprise*) are part of the International Graduate Programme.

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## 1.3 GOVERNANCE

### **Responsibility and tasks of the Supervisory Board in connection with this Policy**

This Code includes specific responsibilities for the Supervisory Board concerning suspicions or allegations of fraud related to accounting and auditing matters, whistleblower reports, conflicts of interest and waivers of the Code for Board Members.

### **Responsibility and tasks of the Managing Board in connection with this Policy**

The Managing Board is responsible for ensuring that this Code and the Company's corporate policies will govern, without exception, all business activities of the Company. The Managing Board and the local Boards, where applicable, are also responsible for approval of updates to the Code. The day-to-day responsibility for implementation, management and maintenance is delegated to Compliance.

### **Responsibility and tasks of the Audit department in connection with this Policy**

This Code is reviewed by the Euronext Internal Audit department at least once every three years. The objectivity and organisational independence of the Internal Audit function are achieved through the Head of Internal Audit reporting directly to the Chairman of Euronext Audit Committee.

### **Reporting on this Policy**

Breaches of the Code should be reported to the Compliance department or by following reporting procedures as described in other relevant company policies or guidelines. Compliance will report material breaches of the Code to the Managing Board and local Boards, if applicable.

### **Stakeholders' responsibilities**

Compliance with the Code is required by all Board members (Managing Board, Supervisory Board and any other Board) and all employees including consultants, contractors, temporary employees (e.g. VIEs and interns) and other personnel working for or on behalf of the Company.

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## 2. DETAILED DESCRIPTION

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### 2.1 ENFORCEMENT

The Managing Board and the local Boards, where applicable, are responsible for ensuring that this Code and the Company's corporate policies will govern, without exception, all business activities of the Company.

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#### **2.1.1 Where to Go with a Question, Concern or to Report a breach – Whistleblower Procedures**

If you need an explanation or you want to know if a provision of the Code applies to a particular situation, the best place to start is with your manager or the Company's Compliance Department.

## Reporting illegal or unethical behavior

If you believe, in good faith, that there has been an alleged breach of our Code, other Company policies or applicable laws and regulations, or a breach related to accounting or auditing matters, criminal, corrupt or fraudulent conduct, or which affects the public interest by posing an unacceptable risk to the life, health or safety of people or the environment, or any other conduct that may have a detrimental effect on the financial situation, integrity or reputation of the Company, you should bring the matter to the attention of your management, the Compliance Department or the Chairman of the Supervisory Board. If allowed by local legislation, you should, in good faith, also report other concerns or alleged breaches.

A report is considered made in good faith when the reporter has reasonable grounds to believe that the information reported is true at the time the report is made.

Doing so will not be considered an act of disloyalty, but an action which shows your sense of responsibility and fairness to the Company, its shareholders and employees. You also help safeguard the reputation and the assets of the Company.

The Company will protect anyone who reports an alleged breach in good faith and will ensure that they shall in no way be put at a disadvantage by the Company as a result of the report. Retaliation against an employee that has reported a violation in conformity with the Whistleblower Policy or who participates in any investigation with respect to a reported breach, shall be considered as a serious violation and must be reported to the Compliance Department.

Please refer to the **Euronext Whistleblower Policy** for additional details on what constitutes reportable breaches under the Policy, available reporting channels and the treatment of reported alleged breaches.

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### 2.1.2 Acknowledgment

All Board members and employees upon first accepting a position with the Company will be required to acknowledge their understanding of this Code and formally to commit to abide by it.

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### 2.1.3 Waivers of the Code

In addition to specific requirements for waivers set out in this Code, in certain extraordinary situations, a waiver of a provision of the Code may be granted. Contact your manager if you believe special circumstances warrant a waiver of any of the Code's provisions. Any waiver of the Code for an employee should be pre-approved by the Compliance Department.

Any waiver of the Code for Managing Board members may be made only by the Company's Supervisory Board.

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## 2.2 CONFLICT OF INTEREST AND HOW TO AVOID IT

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### 2.2.1 General Guidance

Board members and Employees must avoid activities that could create conflicts of interest, to the greatest extent possible. Business decisions and actions must be based on the best interests of the Company and must not be motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect your independent and sound judgment on behalf of the Company.

General guidelines to help Board Members and employees better understand several of the most common examples of situations that may cause a conflict of interest are listed below. However, employees are required to disclose to their manager and to the Compliance Department any situation that may be, or appear to be, a conflict of interest. When in doubt, it is best to be transparent and disclose.

Please refer to the **Euronext Conflicts of Interest Policy** for additional details, examples of conflicts of interest and guidance on how to manage conflict situations.

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### 2.2.2 Board members Guidance

Board members in the Code refer to the Managing and Supervisory Board members of Euronext N.V., as well as the executive and non-executive board members of its subsidiaries.

#### **Conflict of interest related to Euronext N.V. Board members**

Board members should identify and report any circumstances which may give rise to conflicts of interest that may impede their ability to perform their duties independently and objectively and subject them to undue influence.

A Managing Board member shall immediately report any conflict of interest or potential conflict of interest that is of material significance to the Company and/or to him/her, to the chairman of the Supervisory Board and to the other members of the Managing Board.

A Supervisory Board member shall immediately report any conflict of interest or potential conflict of interest that is of material significance to the Company and/or to him/her, to the chairman of the Supervisory Board.

If the chairman of the Supervisory Board has a conflict of interest or potential conflict of interest that is of material significance to the Company and/or to him/her, he or she shall report this immediately to the vice-chairman of the Supervisory Board.

Circumstances which may give rise to conflict of interest, which Board members are required to report, include but are not limited to the following:

- a. the Board member is or has been a shareholder whose participation reaches or exceeds 5% of voting rights of Euronext or a company carrying out similar activities as Euronext or an officer of, or otherwise associated directly with, a shareholder whose participation reaches or exceeds 5% of voting rights of Euronext or a company carrying out similar activities as Euronext.
- b. the Board member is employed or has previously been employed in the previous 18 months in an executive capacity by a company carrying out similar activities as Euronext or a group entity of such company.
- c. the Board member is or has been, within 18 months, a principal of a material professional adviser or a material consultant to Euronext or a company carrying out similar activities as Euronext or a group entity of such company, or an employee materially associated with the service provided.
- d. the Board member is or has been, within 18 months, a shareholder whose participation reaches or exceeds 5% of voting rights or a member of the management body of a company listed on a market operated by Euronext.
- e. the Board member is or has been a material supplier or customer of Euronext or a company carrying out similar activities as Euronext or a group entity of such company, or an officer of or otherwise associated directly or indirectly with a material supplier or customer; and



- f. the Board member has or used to have any other material contractual relationship with Euronext or a company carrying out similar activities as Euronext or a group entity of such company other than as a member of the management body.

The Supervisory Board is responsible for the decision making on dealing with a conflict of interest or potential conflict of interest concerning Board members and documenting such decisions. Any mitigating measures in relation to a conflict of interest of a Board member, should be approved by the Supervisory Board.

A Board member must not participate in the deliberation and the decision-making process and abstain from voting on any matter where the member may have a conflict of interest or where the member's objectivity or ability to properly fulfil his or her duties may be otherwise compromised.

In case a Board member fails to comply with the requirements of this section of the Code, the Company will investigate the matter under the direction and oversight of the Supervisory Board. Following the investigation, the Supervisory Board will decide whether measures need to be taken. Measures may include disciplinary actions.

### **Conflict of interest related to Board members of Euronext N.V. subsidiaries**

A local Board member of a Euronext subsidiary shall immediately report to the local Board any actual or potential conflict of interest that is materially significant to either themselves or to the Company, in accordance with the applicable local policies.

In case of a conflict of interest or potential conflict of interest concerning a local board member of a Euronext subsidiary, the decision-making authority on managing the conflict of interest, any mitigating measures and/or disciplinary actions, is within the remit of the local Board, in accordance with local laws, local applicable policies, if any, and is supported, if so decided, by Euronext Group functions.

Any violation of this Policy by Board directors shall be referred to the Chairperson of the Board, or to the most senior non-executive director if it concerns the Chairperson, for consideration and action.

The Chairperson, or the most senior non-executive director if the violation concerns the Chairperson, will investigate the matter under the direction and oversight of the Board of Directors. Following the investigation, the Board will decide whether measures need to be taken. Measures may include disciplinary actions.

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### **2.2.3 Board membership, external employment and activities**

Executive Managing Board members and Employees are expected to devote all of their professional time and attention, during regular business hours, to the business of the Company. Board memberships, external employments or activities performed during office hours, even if not remunerated, are not allowed a priori.<sup>4 5</sup> This includes board seats, regular teaching activities or work for an association not directly linked to Euronext. Any waiver to this provision

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<sup>4</sup> Employees from the Danish entity are allowed to have other jobs as long as it is not in direct competition or any conflicts of interest related to their job in Euronext.

<sup>5</sup> Employees from the Italian entities are allowed to have other jobs as long as it is not in direct competition or any conflicts of interest related to their job in Euronext and has no impact on health and safety, including the respect of the regulated rest period.

sought in writing from both Compliance and Human Resources departments and requires an approval from the Managing Board.

During Office hours, activities performed in the frame of the Euronext ESG strategy (or 'Society pillar') do not qualify as outside activities if the activity has been approved by Human Resources.

Managing Board members and Employees are free to engage in other (non-employment) activities during non-office hours, provided that such activities do not interfere with the performance of their duties to the Company and do not give rise to any conflicts of interests with the Company. Any activities that could raise conflict of interest issues should not be undertaken without the prior approval of the Compliance Department.

#### **Additional requirements for Board members (executive and non-executive)**

Before effectuation of external directorships, a Supervisory Board member should report to the Chairman of the Supervisory Board or the Vice-chairman, if it concerns the chairman of the

Supervisory Board, any changes in directorships held in other companies or organisations or other relevant functions or professional activities to review and ensure that such activity will not create a conflict of interest.

Similarly, a Managing Board member should report to the Chairman of the Supervisory Board and to the other members of the Managing Board any changes in directorships held in other companies or organisations or other relevant functions or professional activities before effectuation of such directorships or activities, in order to review and ensure that such activity will not create a conflict of interest.

The acceptance of a membership of a Supervisory Board by an executive board member requires the approval of the Supervisory Board.

Board members shall not hold more than one of the following combinations of positions at the same time:

- One executive directorship with two non-executive directorships.
- Four non-executive directorships.

Executive or non-executive directorships held within the same group or undertakings where Euronext owns a qualifying holding shall be considered as one single directorship.

Directorships in organisations which do not pursue predominantly commercial objectives shall be exempt from the limitation on the number of directorships a Board member can hold.

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#### **2.2.4 Family members and close personal relationships**

Board Members and employees may not use personal influence to direct the Company business to a company in which any family member or friend has an interest.

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#### **2.2.5 Investments**

Board members and Employees may not allow their personal investments to influence, or appear to influence, their independent judgment on behalf of the Company. If there is any doubt about how an investment might be perceived, it should be disclosed to the management and the Compliance Department.



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### 2.2.6 Gifts

Some business situations call for giving or receiving gifts. The gifts must be legal, reasonable, and, if the thresholds of the Euronext Gifts, Business Meals and Business Entertainment Policy are met, approved by the management of the employee and/or the Compliance Department.

Board members and employees may not solicit, accept or offer any business entertainment, meals or gifts that are inappropriate or could be perceived as an improper attempt to influence business. In particular, employees and Board members should not accept bribes, kickbacks, gratuities or lavish gifts or accept anything that might make it appear that their judgment on behalf of the Company would be compromised. Board members and employees should be aware that accepting or giving a gift that can be changed into cash is prohibited.

In some rare situations, it would be impractical or harmful to refuse or return a gift. When this happens, discuss the situation with your manager and report to the Compliance Department.

The provisions above apply also to non-executive Board Members when they act in the frame of their mandate to the Company.

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### 2.2.7 Business entertainment and business meals

Board members and employees may accept or provide business entertainment and business meals that are reasonable in the context of the business and that advances the Company's interests. For example, accompanying or inviting a business associate to a local cultural or sporting event, or to a business meal, would in most cases be acceptable. If the accepted or provided entertainment or business meal meets certain thresholds prior approval from your manager and/or the Compliance Department is required.

Entertainment that is lavish or frequent may appear to influence one's independent judgment on behalf of the Company.

The provisions above apply also to non-executive Board Members when they act in the frame of their mandate to the Company.

Consult the **Euronext Gifts, Business Meals and Business Entertainment Policy** for further details with respect to the provisions, the reporting requirements and guidance how to deal with accepting and providing gifts, entertainment and business meals in the course of conducting business.

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### 2.2.8 Travel

Employees may accept transportation and lodging provided by a Company supplier or other third party, if the trip is for business and is approved in advance by the individual's management. Unless prohibited by law or the policy of the recipient's organisation, the Company may pay the transportation and lodging expenses incurred by customers, agents or suppliers in connection with legitimate business activities. The visit must be approved in advance by a Managing Board level representative.

Please refer to the **Travel Policy** for additional details.

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## 2.3 TAKING COMPANY BUSINESS OPPORTUNITIES

Board members and employees may not take for themselves opportunities that rightfully belong to the Company. These opportunities rightfully belong to the Company when, for example, the opportunity is in the same general line of business as the Company's business, the Company has pursued the opportunity, the Company has been offered the opportunity, the Company has funded the opportunity or the Company has devoted facilities or Board members and employees to develop the opportunity.

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## 2.4 PROTECTION OF COMPANY PROPERTY AND ASSETS

All Board members and employees have a responsibility to protect the Company's assets from loss, damage, misuse or theft. The Company's assets may only be used for business purposes and other purposes approved by management. The Company's assets may never be used for illegal purposes. The Company's property should not be taken out of Company facilities unless necessary and authorized in connection with Company work. For more information consult the **Euronext Anti-Fraud Policy**.

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## 2.5 ICT SECURITY

All Board members and Euronext employees must comply with the requirements of the ICT security policies and standards as outlined in the Euronext Cyber & Information Security Policy. The requirements stated in this policy apply throughout Euronext as part of the ICT Risk Management Framework. It applies to all users (Euronext employees including contractors and consultants and other personnel working for or on behalf of the Company, interested parties with access to the organisation's information systems), processes, and technology of the Company. Failure to comply with these requirements may result in disciplinary review (including up to termination of employment) and/or legal action.

More details about the Company's policies regarding ICT Security can be found in the **Euronext Cyber & information Security Policy**.

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## 2.6 PROPRIETARY INFORMATION

All trade secrets and confidential information of the Company must be protected. No Board Member or employee should disclose the Company's trade secrets, confidential information or proprietary information to anyone within or outside of the Company unless the recipient will need the information to carry out his or her assigned responsibilities as an employee of the Company, or the recipient is an outsider who has been properly authorized by management to receive such information.

Inquiries from the press, media, investors or the public regarding the Company should only be answered by the officers or employees designated to respond to such inquiries. The obligation not to disclose the Company's trade secrets, confidential information or proprietary information continues after employment with the Company terminates.

More details about the Company's policies regarding the protection of confidential information can be found in the **Euronext Confidential and Insider Information Policy**.

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## 2.7 COMMUNICATIONS/MEDIA

Euronext N.V. is a listed company and as such, all material public information must be communicated through press releases/website articles or in the annual Euronext Universal Registration Document. Euronext employees are brand ambassadors for Euronext and the financial services industry during professional events, meetings with clients and partners, conversations with family and friends and, increasingly, on social media.

### **Media Appearances and Public Speaking**

Euronext N.V. supports public appearances by its employees as competent speakers, panellists and in interviews, communicating a rightful image of the company. In order to ensure consistent and coherent messages, only designated spokespeople may speak to the media, and only if accompanied by a member of the Media Team.

The list of Euronext spokespeople is reviewed by the Media Team twice a year. All spokespeople are required to first complete Euronext-led media training, regardless of their prior experience. After completing the media training, all spokespeople must sign a consent form. Spokespeople making public appearances should anticipate the media's presence and prepare accordingly. Spokespeople should always inform the Media Team of their participation in industry events where the press is present so that the Media Team can provide help to prepare for these situations if necessary. Spokespeople are also advised to consult the Media Team before making any commitment to speak at an event to ensure that their participation is aligned with the Euronext Communications' Calendar, which is used to monitor all public interactions.

### **Social Media Activity**

Euronext N.V. recognises and encourages active and responsible participation in social media and online communications. For professional social media activities on personal accounts, Euronext's social media team supports employees in developing their online presence while respecting company guidelines, helping them to act responsibly on topics associated with Euronext. They should use a professional tone of voice, follow the Euronext social media guidelines, and ensure that they do not make public confidential information or internal matters.

### **Communication with shareholders and other parties in the financial markets**

Euronext N.V. ensures that all shareholders and other parties in the financial markets are provided with equal and simultaneous information about matters that may influence the share price. Communications to shareholders and other parties in the financial markets are based on accurate, transparent, and timely disclosure of material information to enable them to track Euronext's activities, assess its performance and estimate its growth potential. These communications are made according to the obligations and restrictions arising from the applicable legislation and regulations where Euronext N.V. is publicly listed.

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## 2.8 COMPLIANCE WITH THE LAW

Euronext N.V. requires that the business run by its affiliates comply with all applicable laws in the countries where they operate, as well as any relevant foreign jurisdictions, and be conducted in a manner that upholds the highest ethical standards. The laws and regulations applicable to the Company are far reaching and complex.

Compliance with the law does not comprise our entire ethical responsibility; rather, it is a minimum, absolutely essential condition for performance of our duties. Perceived pressure from supervisors or demands due to business conditions are not excuses for violating the law. Any questions or concerns about the legality of an action should be addressed to the Compliance Department, and /or the Legal Department.

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## 2.9 INSIDE INFORMATION AND PERSONAL TRADING

In the course of business activities, you may become aware of material non-public information regarding the business, operations or securities of the Company or firms dealing with the Company. The applicable securities laws prohibit trading securities using such material non-public information (often called "inside information"). Also disclosing such information to others other than in the exercise of professional duties or recommending a third party to trade based on inside information are strictly prohibited. In addition, the Company restricts certain trading activities and trading in certain products, regardless of the existence of material non- public information.

For full details of restrictions related to inside information and trading activity restrictions, please refer to the **Policy preventing insider trading on Euronext NV Financial instruments** and to your company's applicable policy (**Personal Trading Policy** or local policy in case of regulatory accrued restrictions).

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## 2.10 FAIR COMPETITION

No Board Member or employee should ever use any illegal or unethical method to gather competitive information. Stealing proprietary information, possessing trade secret information that was obtained without consent or inducing such disclosures by past or present employees of other companies is prohibited. Additionally, the Company, the Board members and its Employees are required to comply with the applicable antitrust and unfair competition laws where the Company does business. Board members and employees who question whether a contemplated action may violate fair competition laws should speak to his or her manager or seek advice from the Legal or Compliance Department.

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## 2.11 RESPONSIBILITY TO THE EMPLOYEES

The Company is committed to treating all employees with honesty, fairness and respect, and providing a safe and healthy work environment. The Company does not tolerate any harassment including sexual harassment, whether verbal or physical, whether from managers or employees, and will take immediate and appropriate action upon becoming aware of such cases. Examples include derogatory comments based on a person's gender or racial or ethnic characteristics, and unwelcome sexual advances. All employees are required to take personal and individual responsibility to comply with the Company's policies and behave in a non-discriminatory way and not to participate in any acts of inappropriate behaviour, harassment or bullying. Employees are encouraged to report any breaches and can also refer to his or her HR Business Partner.

For further details related to reporting alleged breaches through the whistleblowing channels, please refer to the **Euronext Whistleblower Policy**<sup>6</sup>.

Additionally, 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 will comply with all health and safety laws and regulations as well as Company policies governing health and safety. All employees are responsible for immediately reporting accidents, injuries and unsafe equipment, practices or conditions to a manager or other designated person.

More details about the Company's policies on workplace harassment, and workplace safety may be found in the respective employee Handbooks of each location, if any.

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## 2.12 HUMAN RIGHTS

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). We also take into account the United Nations framework and guiding principles on business and human rights, as well as the International Labour 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.

Euronext is committed to respecting and promoting the human rights of all employees, contractors and its workforce more globally. In practice, Euronext ensures notably that it prohibits any form of discrimination, respects the right of association, recognises collective agreements, and ensures to eliminate all forms of forced labour and child labour. Euronext is also committed to ensuring all Group entities operate in a consistent and effective way with regard to modern slavery and human trafficking risk, considering all forms of modern slavery and human trafficking as a crime and a violation of fundamental human rights.

Euronext has implemented statements and policies that aim to ensure directly or indirectly the respect of human rights at Euronext. Among them, one can find our Human Rights Policy, Supplier Code of Conduct, and Whistleblower Policy to encourage reporting of any issue.

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## 2.13 DIVERSITY, EQUITY AND INCLUSION BY NATURE AND BY COMMITMENT

The federal governance model remains central to the Company's organisation and naturally creates an environment where people of diverse cultures and backgrounds collaborate and drive the organisation forward. Diversity at the Company includes gender, ethnicity, religion, sexual orientation, age, language, socioeconomic status, physical and mental ability, experience and education, political and or trade union belonging, family status and more broadly, all forms of diversity including any other grounds protected under law. Diversity and Inclusion are embraced in every area of the Company's people agenda.

Creating an environment where diversity is recognised, valued and can flourish, not only benefits the Company's employees but also the success of the business. Euronext N.V. firmly believes that a wide array of perspectives and approaches promotes innovation and creativity and enables

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<sup>6</sup> Depending on applicable local laws, misconduct within the workplace (e.g. harassment, discrimination or bullying) may be a reportable breach if it affects the public interest, e.g. because the misconduct affects multiple persons, there is a pattern or structural character or the conduct is serious and extensive.



us to better understand and address the needs of our customers, strengthening our client-centric approach and reputation.

The Company 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. This applies specifically to any gender-based type of discrimination or any other forms of diversity. All countries are equipped, according to their local regulations, with appropriate grievance escalation and investigation processes.

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## 2.14 EMPOWERING SUSTAINABLE FINANCE

The world is facing significant challenges in ensuring a sustainable future for our people and our planet.

Like every organisation, Euronext has to play its particular role in the transition to a sustainable society, depending on its impact and its opportunities. Euronext does this by supporting the allocation of capital to sustainable initiatives with added environmental value and inspiring and promoting sustainable tangible practices within the Company and towards our community, by respecting and developing our people and by supporting our ecosystem. Euronext aims to reduce our own carbon footprint in order to contribute to the protection of the environment and we reaffirm Euronext's Fit for 1.5° climate commitment, to developing services and products that help our business partners, clients and the global economy in general to curb the increase in global temperatures from pre-industrial times and ensure this increase remains below the 1.5°C target, as set out in the Paris Agreement.

Employees can contribute by participating in local actions aimed at protecting the environment, contribute to the development of products and services with added environmental value and by reducing your personal carbon footprint, for example by limiting travel and the use of paper.

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## 2.15 ACCURACY AND RETENTION OF BUSINESS RECORDS

Accounting standards and applicable laws require that transactions and events relating to the Company's assets must be properly recorded in the books and accounts of the Company and accurately reported in the applicable reports required by and filed with competent authorities.

As a result, all finance and accounting employees shall make and retain books, records and accounts that, in reasonable detail, accurately, completely and objectively reflect transactions and events, and conform both to required accounting principles and to the Company's systems of internal controls. No false or artificial entries may be made. No entry may be made or recorded in the Company's books and records or reported in any disclosure document that misrepresents, hides or disguises the true nature of the event or transaction, and all entries and reports must be made in a timely manner.

Board members and employees should take into account the Company's Record Retentions and destruction Policy and consult the Legal Department regarding questions related to the Company's document retention guidelines or the propriety of disposing of Company documents or records.

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## 2.16 ADDITIONAL REQUIREMENTS FOR SENIOR OFFICERS – CODE OF ETHICS

In addition to the requirements specified in the Code, the Company's Chief Executive Officer and senior financial officers, including, but not limited to, the Chief Financial Officer, Chief Accounting Officer, corporate controller or persons performing similar functions, must:

- conduct themselves in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- compile full, fair, accurate, timely and understandable disclosure in the periodic reports of the Company; and
- in accordance with applicable governmental rules and regulations.

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## **2.17 ANTI-MONEY LAUNDERING, SANCTIONS, ANTI-BRIBERY AND ANTI-CORRUPTION**

In Europe, the United States, Asia-Pacific and other places where the Company conducts business activities, there are strict laws directed at preventing the use of the financial system for financial crimes, including money laundering, terrorist financing, sanctions and bribery offenses. The confidence in the financial system as a whole could be seriously damaged by efforts to use the financial system for financial crimes.

Euronext N.V. 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 prohibitions and restrictions mandated by the sanctions programmes administered by the U.S., and the Common and Foreign Security Policy (CFSP) of the European Union. The EU Sanctions Programmes and other applicable sanctions laws generally impose economic and trade sanctions against particular persons, entities, countries and territories. These include persons and entities identified on sanctions lists. These also prohibit or restrict certain activities by persons or entities.

Further, Euronext N.V. is firmly committed to conducting business via its affiliates in full compliance with applicable the anti-bribery and anti-corruption laws of the countries where its affiliates operate. The laws of many of the countries in which the Company conducts business activities make the payment or offer of payment and the acceptance or request of a bribe, kickback or other corrupt payment a crime. A violation of these laws could severely damage the Company's reputation, and subject both the Company and the individuals to substantial monetary fines and even imprisonment. Accordingly, you may not give or promise to give money or anything of value to any executive, official or employee of any government, governmental agency, political party (including candidates for political office) or other organisation if it could reasonably be construed as being intended to influence a Company business relationship with such entity. Such payments may not be made by you or any agent of the Company to obtain or retain business or secure any improper advantage.

A failure by the Company or any Board member or employee of the Company to comply with these applicable anti-money laundering, sanctions and anti-bribery and anti-corruption laws, rules and regulations may subject the Company or its Board members or employees to significant penalties, including imprisonment and substantial fines. Protecting the Company from being a party to violations of these laws and regulations is the responsibility of each Board member and employee of the Company. Therefore, any transaction or activity that raises money laundering, terrorist financing, sanctions, bribery or corruption concerns for you, should be reported immediately to your manager and the Compliance Department.

For additional information related to these laws and regulations, employees should consult the Company's **Anti-money laundering and sanctions Policy**, as well as the **Anti-bribery Policy and relevant procedures**.

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## 2.18 DATA PRIVACY

In the course of carrying out its activities, the Company holds personal data relating to data subjects, such as but not limited to Board members, employees and staff of customers or other business partners. The Company respects the privacy and data protection rights of both Board members and employees and its customers. The legislative obligations imposed on the Company lay down the rules relating to the manner in which personal data can be collected, accessed, used and disclosed. The Company is committed to:

- Obtain and process data fairly, lawfully and in a transparent manner.
- Use and disclose data only in ways compatible with the purpose of the data.
- Keep data safe and secure.
- Keep data accurate, complete and up-to-date.
- Ensure that collection of data is adequate, relevant and not excessive.
- Retain data for no longer than is necessary for the purpose(s).
- Provide an individual on request a copy of his or her personal data.

For further details on data privacy, see the **Company's Data Privacy Statements** <sup>7</sup> and consult the Company's Data Protection Officer regarding questions related to data privacy.

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## 2.19 SUPPLEMENTAL POLICIES AND PROCEDURES

As previously indicated, you may be subject to policies and procedures supplemental to this Code depending on your job function or your area of responsibility. From time to time, the Company may publish additional policies and procedures as deemed necessary or appropriate.

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<sup>7</sup> For employees, please refer to the Data privacy notice available on on: [Pages - GDPR \(sharepoint.com\)](#). For Board members, please refer to the Governance Policy. For all other individuals (consultant, contractors...), please refer to the Data privacy statement available on: <https://www.euronext.com/en/privacy-policy>

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**APPENDIX APPLICABLE TO COMPANIES INCORPORATED IN ITALY**

The Head of Ethics and the Compliance Department, according to their respective responsibilities are in charge for the promotion and supervision of the Code for the Italian legal entities.

**ORGANISATION, MANAGEMENT AND CONTROL MODEL**

The addressees, during the period of their engagement or relationship, must refrain from carrying out any act that entails the violation also of the Organisation, Management and Control Model (also the "Model") pursuant to Legislative Decree No. 231/2001 ("Rules governing the administrative liability of juridical persons, companies and associations including those without juridical personality").

Any questions of interpretation concerning the implementation of the Model shall be submitted to the Surveillance Body for examination or further advice, if they cannot be resolved by applying the principles set out in this Code.

**PROVISIONS FOR EMPLOYEES**

Breaches of the rules contained in this Code, in the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 as well as in the National Collective Labour Agreement applied to the individual employment relationship, committed by Italian legal entities' employees constitute a disciplinary offence and will therefore be subject to penalties, in accordance with the procedure pursuant to Article 7 of Law 300/1970 and the provisions of the National Collective Labour Agreement applicable to the employment relationship of the employee concerned.

In particular, pursuant to the provisions of the national collective agreement applicable to the individual employment relationship fully referred to and confirmed herein, the following penalties shall apply:

For those employees to whom the National Collective Agreement of Credit Sector applies:

- a) verbal warning
- b) written warning
- c) Suspension from the service and from remuneration's payment for a period not exceeding 10 days;
- d) Disciplinary dismissal with notice
- e) Disciplinary dismissal without notice

For those employees to whom the National Collective Agreement of Trade applies:

- a) Verbal warning
- b) Written warning
- c) fine not exceeding the amount of 4 hours of salary
- d) Suspension from the service and from remuneration's payment for a period not exceeding 10 days;
- e) Disciplinary dismissal