



## EURONEXT DIVERSITY, INCLUSION AND ANTI-DISCRIMINATION GROUP POLICY

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### 1. INTRODUCTION

As the leading European capital market infrastructure, Euronext provides trusted and sustainable markets to drive innovation and growth. Euronext offers a unified, multi-asset platform that meets the needs of issuers, investors and financial institutions across geographies. From listing and trading to post-trade, data and technology services, Euronext supports every step of the capital markets value chain.

The federal model, multinational footprint and multicultural workforce make diversity an inherent characteristic of Euronext. Across the Group:

- Business lines operate across borders to meet client expectations, while each local entity maintains its identity, expertise and strengths.
- Euronext’s governance and management structures reflect the diversity embedded in its federal model.
- We bring together a diverse and entrepreneurial workforce united by a shared purpose: shaping capital markets for future generations.

Euronext believes that diversity and inclusion are critical to long-term performance, innovation and sustainable growth.

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### 2. SCOPE AND OWNERSHIP

This Diversity, Inclusion and Anti-Discrimination Policy (the “Policy”) applies to all Euronext entities, activities, operations and employees across all jurisdictions in which the Group operates. It also applies to temporary workers, interns, contractors and consultants, and to third parties interacting with Euronext staff in a professional context.

The Policy is owned by the Chief Talent Officer and implemented with the support of HR and managers. It operates in conjunction with, and does not replace or override:

- the Code of Ethics and Business Conduct;
- the Inclusive Workplace Conduct and Issue Reporting Procedure;
- the Whistleblowing Policy;
- applicable local laws and regulations.

Where differences arise between this Policy and local legal requirements, local law prevails.

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### 3. DEFINITIONS

For the purpose of this Policy, and mainly based on international standards described in section xx, below are the core definitions used:

- Diversity includes, but is not limited to, gender, gender identity and expression, age, ethnicity, nationality, religion or belief, disability, sexual orientation, language, socioeconomic background, education and professional experience.
- Discrimination means less favourable treatment, exclusion or disadvantage based on a protected or personal characteristic, contrary to applicable law or Euronext policy.
- Harassment means any unwanted conduct related to a personal characteristic that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- Sexual harassment means any unwanted conduct of a sexual nature, verbal, non-verbal or physical (including remarks, gestures or contact) that violates a person’s dignity.
- Bullying means repeated, unreasonable behaviour directed towards an individual or group that creates a risk to health, safety or well-being.
- Retaliation means any adverse action or threat taken against a person because they raised a concern or participated in an investigation in good faith.

These definitions apply regardless of intent and cover conduct in physical workplaces, during work-related travel or events, and in digital environments (email, messaging, video calls and social platforms used for work).

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### 4. EURONEXT’S COMMITMENT

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#### 4.1 Euronext’s core commitment towards diversity, inclusion, non-discrimination and anti-harassment

Euronext’s shared values — Unity, Integrity, Agility, Energy and Accountability — guide behaviours and decision-making across the Group and underpin an inclusive workplace culture.

Our long-standing commitment to diversity is entrenched in our Corporate values, particularly that of “Unity” which encompasses three main elements:

- We respect and value the people we work with
- We are unified through a common purpose
- We embrace diversity and strive for inclusion

Euronext is committed to providing a work environment in which all individuals are treated with dignity and respect. Discrimination, harassment or bullying in any form is not tolerated, including within recruitment, promotion, compensation, training, career development or any other employment-related decision. Discriminatory or harassing behaviour or language, whether engaged in by managers, employees, contractors or third parties, is prohibited and may result into disciplinary action.

All employees are expected to:

- Treat others with respect;
- Refrain from any form of discrimination, harassment, bullying or inappropriate conduct;
- Comply with Euronext policies and applicable laws;
- Co-operate in investigations when required, in respect of confidentiality.

Managers have an additional responsibility to act promptly when concerns are raised or observed and to foster a respectful and inclusive working environment.

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#### 4.2 Commitment to gender diversity

Euronext is committed to promoting balanced gender representation at all levels of the organisation. In particular, Euronext aims to achieve and maintain balanced gender representation on its Supervisory Board and Managing Board, with at least 30% representation of each gender, in line with applicable legal and governance standards.

Across recruitment and talent management processes, Euronext selects candidates based on merit, skills and objective criteria, while recognising the value of diverse talent pools and complying with applicable local laws. Euronext further commits to supporting the recruitment, development and retention of women across the organisation to strengthen the pipeline of female talent, including for senior leadership positions.

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### 5. IMPLEMENTATION AND REPORTING PRINCIPLES

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#### 5.1 Ensuring principles are transformed into action

Euronext integrates diversity and inclusion across core people processes and maintains a Group-wide D&I roadmap, reviewed and updated regularly in line with strategic priorities.

Key principles include:

- Attracting, developing and retaining diverse talent through fair and inclusive recruitment, onboarding, performance management, career development and retention practices;
- Raising awareness and capability through communication and employee engagement initiatives, including a network of volunteers identified amongst Euronext's employees to champion Diversity and Inclusion initiatives, based in each location, working together with local Human Resources departments and local CEOs.

- Providing regular training and awareness on respect in the workplace, diversity and inclusion, unconscious bias, discrimination, and harassment. Leaders and managers receive additional guidance on responsibilities and early intervention. Euronext embeds in its new joiner path a dedicated online training to present Euronext Diversity, Inclusion and Anti-Discrimination approach.
- Ensuring a strict Zero-tolerance principle for discrimination, harassment and bullying, supported by clear procedures, safeguards against retaliation and accessible reporting mechanisms (see below section about reporting).
- Complying with applicable laws and regulations in each jurisdiction where Euronext operates.

Progress against D&I ambition and objectives, is regularly reviewed by management, and action plans are adjusted as necessary. Measures can be done via several tools such as metrics, employee survey and training attendance.

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## 5.2 Reporting procedures

Euronext encourages early reporting and due investigation where needed. Employees who experience or witness discrimination, harassment or bullying, specifically linked to any diversity criteria — or who have doubts or suspicions about workplace conduct — are encouraged to seek guidance or report concerns through:

- Inclusive Workplace Conduct and Issue Reporting Procedure, available to all staff on Euronext's intranet and explained in the Euronext Diversity and Inclusion eLearning, part of new joiner path — this procedure details internal reporting options, process steps and protections and is implemented by the Human Resources Department.
- Whistleblowing Policy and its associated tools and processes remain available to report any serious breaching incidents including any related to discrimination, harassment or bullying situation according to local regulations. They may be used if the employee estimated the above procedure cannot be applicable to the situation. It is implemented by the Compliance department, in close coordination with Human Resource Department if allowed by the situation.

All concerns raised will be handled:

- Seriously and promptly;
- Impartially and with appropriate confidentiality;
- In accordance with applicable procedures and local laws.

Where misconduct is substantiated, Euronext will take appropriate corrective and/or disciplinary measures, up to and including termination of employment. Euronext may also implement remedial actions (e.g., coaching, training, team interventions) to restore a safe and respectful environment.

As part of its Reporting procedures, Euronext strictly prohibits retaliation against anyone who raises a concern in good faith, reports discrimination, harassment or bullying, or participates in an investigation. Any act of retaliation is treated as a serious breach of Euronext policies and may result in disciplinary action.

No employee will be penalised for seeking guidance or raising a concern in good faith, including by consulting the Inclusive Workplace Conduct and Issue Reporting Procedure.

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## 6. ALIGNMENT WITH INTERNATIONAL STANDARDS AND EU LAW

Euronext's commitments under this Policy are informed by internationally recognised standards and EU law, including ILO conventions C111 and C190 [1][2], the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights [3][4], EU equal treatment directives 2000/43/EC, 2000/78/EC and 2006/54/EC [5], the EU Pay Transparency Directive (EU) 2023/970 [6], and the EU Whistleblower Protection Directive (EU) 2019/1937 [7]. Euronext will review this Policy periodically to reflect developments in applicable local laws and these standards.

### Governance and Document History

Previous policy approval: Diversity and Anti-Discrimination Policy approved by the Euronext Managing Board on 12 February 2018.

### References

- [1] ILO Convention No. 111 — Discrimination (Employment and Occupation) Convention, 1958: [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:::NO:12100:P12100\\_ILO\\_CODE:C111:NO](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:::NO:12100:P12100_ILO_CODE:C111:NO)
- [2] ILO Convention No. 190 — Violence and Harassment Convention, 2019: [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C190](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)
- [3] Universal Declaration of Human Rights (OHCHR): [https://www.ohchr.org/en/UDHR/Documents/UDHR\\_Translations/eng.pdf](https://www.ohchr.org/en/UDHR/Documents/UDHR_Translations/eng.pdf)
- [4] UN Guiding Principles on Business and Human Rights (OHCHR): [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)
- [5] EU equal treatment directives: 2000/78/EC — <https://eur-lex.europa.eu/eli/dir/2000/78/oj/eng>; 2006/54/EC — <https://eur-lex.europa.eu/eli/dir/2006/54/oj/eng>; 2000/43/EC — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0043>
- [6] EU Pay Transparency Directive (EU) 2023/970: <https://eur-lex.europa.eu/eli/dir/2023/970/oj/eng>
- [7] EU Whistleblower Protection Directive (EU) 2019/1937: <https://eur-lex.europa.eu/eli/dir/2019/1937/oj/eng>