

Anti-slavery and human rights policy

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 (UNGPs), as well as the International Labour Organization (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 to its workforce more globally. It also applies by extension to all contractors through its supplier position. In practice, Euronext ensures notably that it prohibits any form of discrimination, respects the right of association, recognises collective agreements, and ensures it eliminates all forms of forced labour and child labour.

With our suppliers, we consider that our role is to monitor the respect of human rights within our 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 labour, avoidance of child labour, 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 covered in our Supplier Code of Conduct, Euronext will terminate its business relationship with that client.

Scope and Responsibility

Euronext's Anti-slavery and Human Rights Policy is implemented and owned by the Chief Talent Officer with respect to employees. Oversight relating to contractors and third-party workers is ensured through the Chief Financial Officer and supported by all relevant departments and business lines.

It is applied comprehensively, covering all of the company's activities, operations and encompasses all geographies. This policy is also implemented by the head of procurement when appointing third-party workers and external contractors involved in Euronext operations.

Implementation plan

Euronext has implemented policies that aim to ensure directly or indirectly the respect of human rights at Euronext and to reduce financial crimes, bribery and conflicts of interest. These include our Supplier Code of Conduct, Euronext's Code of Business Conduct and Ethics, and others. This regulatory framework and the policies cannot be changed without Euronext Group prior written approval. To ensure adherence to its regulatory framework, Euronext conducts ongoing assessments and has established a whistleblowing policy to encourage reporting of any issue.

ESG Due Diligence Process for M&A

Euronext applies an established internal ESG due diligence process for all acquisitions. This process ensures that relevant ESG risks, impacts and opportunities are systematically identified, reviewed and factored into M&A decision-making.

A dedicated ESG due diligence stream, led by the ESG team, must be included in every transaction. The ESG team is responsible for conducting the assessment, supported by other relevant functions (e.g. M&A, Finance, Legal, Risk). To this end, an ESG questionnaire will be sent to the acquisition target to collect essential information on ESG performance and practices. This will enable the ESG team to anticipate potential ESG-related impacts, risks, or opportunities, and to assess whether the acquisition could affect Euronext's ESG targets or require a recalibration.

Remediation and Escalation

Where human rights breaches are identified within Euronext Group's supply chain, the Group shall take prompt appropriate corrective measures, in coordination with the relevant internal functions, including Procurement, Compliance, and Legal.

Depending on the contractual arrangements in place and the severity classification of the identified breach, remediation actions are taken and they may include engaging with the supplier to request corrective measures, defining improvement plans, and monitoring their implementation to obtain the full resolution of the failure.

Euronext Group also leverages its whistleblowing system as a key mechanism for the early identification and escalation of potential breaches. All reported concerns shall be logged, investigated, and tracked to resolution.

Where corrective measures fail to deliver material compliance within the required timeline, or where the breach is considered critical, Euronext shall escalate the matter in accordance with its internal governance procedures and, where contractually permitted, consider appropriate actions. This may result in suspension of the ongoing arrangement(s) concerned, the exit, the step in or the termination of the business relationship.

or referred to in this publication shall form the basis of any contract. The creation of rights and obligations in respect of financial products that are traded on the exchanges operated by Euronext's subsidiaries shall depend solely on the applicable rules of the market operator. All proprietary rights and interest in or connected with this publication shall vest in Euronext. No part of it may be redistributed or reproduced in any form without the prior written permission of Euronext. Euronext refers to Euronext N.V. and its affiliates. Information regarding trademarks and intellectual property rights of Euronext is located at [euronext.com/terms-use](https://www.euronext.com/terms-use). © 2024, Euronext N.V. - All rights reserved.



[euronext.com](https://www.euronext.com)