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COMPLIANCE FRAMEWORK

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DOCUMENT SUMMARY

Document type		Framework
Purpose of the document		This document defines Euronext's compliance governance, outlining the roles, responsibilities, and structures for managing compliance risks, promoting ethical conduct, ensuring adherence to laws and regulations, and fostering a strong compliance culture across all Euronext Group companies.
Target Audience		Public & employees
Classification		Public
RACI	Responsible / Document owner	Group Head of Compliance
	Accountable	Managing Board of Euronext N.V.
	Consulted	All relevant departments and business lines
	Informed	All Euronext Group Entities, Business Units, and Employees
Reference to related Euronext documentation		Universal Registration Document (URD) Anti-Fraud Policy Anti-Bribery Policy Anti-Money Laundering and Sanctions Policy Code of Business Conduct and Ethics
Regulations and frameworks linked to this document		EU Corporate Governance Framework General Data Protection Regulation (GDPR) OECD Guidelines
Review frequency		This policy is reviewed on a regular basis, at least once a year, to ensure continued alignment with Euronext's strategy, regulatory developments and evolving best practices.

VERSION CONTROL

REVISION NO./ VERSION NO.	DATE	AUTHOR	APPROVAL	CHANGE DESCRIPTION
1.0	26/08/2024	Group ESG	Managing Board of Euronext N.V.	First Version

CONTENTS

- 1. OBJECTIVES, OWNERSHIP AND GOVERNANCE..... 4**
- 1.1 Objectives..... 4
- 1.2 Ownership 4
- 1.3 Governance..... 4
- 2. DETAILED DESCRIPTION 5**
- 2.1 Scope..... 5
- 2.2 compliance framework 5

1. OBJECTIVES, OWNERSHIP AND GOVERNANCE

1.1 OBJECTIVES

The objective of this Compliance Framework is to establish a structured approach for the identification, management, and oversight of compliance risks across Euronext, in line with the three lines of defence model. It defines the governance, roles, and responsibilities required to ensure that Euronext's activities are conducted in compliance with applicable laws, regulations, and ethical standards, while supporting effective compliance risk management and promoting a consistent compliance culture across the Group.

1.2 OWNERSHIP

The Euronext's Compliance framework is implemented and facilitated by the Group Head of Compliance and supported by all relevant departments and business lines. The policy is owned by the General Counsel.

1.3 GOVERNANCE OF THE FRAMEWORK

The Supervisory Board oversees the activities of the Managing Board and the general business of Euronext. ESG including ESG Policies, is addressed regularly at Supervisory Board meetings.

The Supervisory Board has four different committees (nomination and governance, audit, risk, and remuneration). Each of these has a role to play in the sustainable journey of the Group as explicitly outlined in their respective charters or in the Supervisory Board's Rules of Procedure.

The Managing Board is responsible for the effective management of (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 Group's risk appetite.

2. DETAILED DESCRIPTION

2.1 SCOPE

This framework is applied comprehensively, covering all of the company's activities and operations and across the value chain. It encompasses all geographies where Euronext operates and extends to our employees.

2.2 COMPLIANCE FRAMEWORK

Euronext's compliance governance, in line with the overall group governance, is organised based on the three lines of defence model.

The Managing Board is responsible for the effective management of (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 Group's 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 defence 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. This includes raising 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