



Document title

# **RESPONSIBLE MARKETING POLICY**

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POLICY

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## DOCUMENT SUMMARY

<b>Document type</b>		Policy
<b>Purpose of the document</b>		Description of the measures taken by Euronext to ensure that all marketing activities are conducted responsibly, transparently and ethically, with communications that are accurate, clear and free from misleading statements.
<b>Target Audience</b>		Public & Employees
<b>Classification</b>		Public
<b>RACI</b>	<b>Responsible / Document owner</b>	Group Communication Department and Business Marketing Department
	<b>Accountable</b>	Managing Board of Euronext N.V.
	<b>Consulted</b>	All relevant departments and business lines
	<b>Informed</b>	All Euronext Group Entities, Business Units, and Employees
<b>Reference to related Euronext documentation</b>		<a href="#">Universal Registration Document (URD)</a> <a href="#">Sustainable events and marketing materials policy</a> <a href="#">Procurement and supply chain policy</a>
<b>Regulations and frameworks linked to this document</b>		International Chamber of Commerce (ICC) Advertising and Marketing Communications Code Relevant European regulations on advertising, marketing and anti-greenwashing Applicable data privacy laws in all geographies where Euronext operates
<b>Review Frequency</b>		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**

<b>REVISION NO./ VERSION NO.</b>	<b>DATE</b>	<b>AUTHOR</b>	<b>APPROVAL</b>	<b>CHANGE DESCRIPTION</b>
1.0	09 02 2026	Group Communication and Business Marketing Department	Managing Board of Euronext N.V.	First Version

**CONTENTS**

- 1. OBJECTIVES, OWNERSHIP AND GOVERNANCE..... 5**
- 1.1 Objectives..... 5
- 1.2 Ownership ..... 5
- 1.3 Governance of the policy ..... 5
- 2. DETAILED DESCRIPTION ..... 6**
- 2.1 Scope..... 6
- 2.2 Commitments..... 6
- 2.2.1 Principles of Responsible Marketing ..... 6
- 2.2.2 Ethical Communication & Anti-greenwashing..... 6
- 2.2.3 Partnerships and External Collaboration ..... 7
- 2.2.4 Data Privacy..... 7



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## 1. OBJECTIVES, OWNERSHIP AND GOVERNANCE

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### 1.1 OBJECTIVES

Euronext is committed to conducting all marketing activities responsibly, transparently, and ethically. Although Euronext does not have retail clients, this policy ensures that all communications towards market participants, issuers, investors, and partners are accurate, transparent, and free from misleading statements.

Responsible marketing at Euronext means communicating with honesty, clarity, and respect — ensuring that no marketing, promotional or sustainability-related message is misleading, exaggerated, or inconsistent with verified company data or disclosures.

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### 1.2 OWNERSHIP

The Group Communication department and Business Marketing departments are responsible for implementing this policy

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### 1.3 GOVERNANCE OF THE POLICY

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 leverages ESG expertise - including climate risk and the EU taxonomy - to embed environmental, social and governance principles into corporate decision-making. Managing Board members' responsibilities align with their terms of reference. Each sustainability topic is guided by specialized expertise, aligning skills with Euronext's material impacts, risks, and opportunities. The Managing Board conducts an annual review of all the ESG Policies and statements and approved any new or amended policies if any.

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## 2. DETAILED DESCRIPTION

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### 2.1 SCOPE

This policy provides guidance to all employees and external partners involved in the promotion, communication, and organisation of Euronext's products, services, and events. It applies to 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. It 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.

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### 2.2 COMMITMENTS

#### 2.2.1 Principles of Responsible Marketing

Euronext's marketing activities are guided by the principles of legality, decency, honesty, and truthfulness, as defined by the *International Chamber of Commerce (ICC) Advertising and Marketing Communications Code*. In addition, all communications must align with relevant European regulations<sup>1</sup>.

Euronext commits to the following criteria:

- Transparency: all marketing communications must be factual, balanced, and verifiable.
- Clarity: materials must avoid jargon or ambiguity and clearly disclose any associated risks and limitations.
- Respect and Inclusion: all materials must reflect Euronext's values of diversity and equality, avoiding stereotypes or discriminatory representations.
- Accountability: marketing teams must ensure their activities comply with this policy, subject to periodic review.

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#### 2.2.2 Ethical Communication & Anti-greenwashing

Euronext is committed to ensuring that all marketing and communication materials — including press releases, marketing campaigns, reports, social media, events, and educational initiatives — are accurate, transparent, and fair.

All marketing campaigns and contents shall be designed and distributed only to relevant and targeted audience segments based on legitimate interest and consent to avoid misleading or irrelevant communications. They must include clear, relevant disclaimers that ensure transparency and accuracy of information

Particular attention must be given to sustainability-related content, which requires a higher level of accuracy and evidence to avoid misleading or exaggerated claims. All such materials must:

- Be based on publicly available and verifiable data (e.g. Euronext's Sustainability Report, ESG policies, or regulatory disclosures).
- Avoid overstating progress or implying outcomes not yet achieved.
- Present sustainability topics in an informative and educational way.
- Undergo review by the Sustainability and Legal departments before publication.

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<sup>1</sup> Including MiFID II, ESMA Guidelines on Marketing Communications, SFDR, and the CSRD/ESRS G1 governance principles.

Through these practices, Euronext aims to uphold the highest standards of integrity, protect its reputation, and contribute to a well-informed understanding of sustainable finance among stakeholders, regulators, and partners, while mitigating the risk of greenwashing.

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### **2.2.3 Partnerships and External Collaboration**

Euronext partners with organisations that share its commitment to responsible marketing and sustainable practices.

Any joint campaigns, educational programmes, or event collaborations must align with this policy's transparency and accuracy standards.

Partnerships with organisations are used to promote knowledge sharing and awareness, not product promotion.

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### **2.2.4 Data Privacy**

Euronext is strongly committed to protecting the privacy of all the individuals from whom it collects personal data (e.g. its stakeholders, such as employees, clients, customers, prospects, partners and investors) and upholding their right to privacy. Euronext is transparent about how it collects and processes personal data and provide an overview of data subjects' rights in relation to personal data as well as how to exercise them. The use of personal data for marketing purposes is transparent and our target audience is able to opt in and/or opt out at any time.