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SUSTAINABILITY POLICY

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DOCUMENT SUMMARY

Document type		Policy
Purpose of the document		Description of the key principles governing Euronext’s approach to sustainability, including its governance framework and the responsible management of environmental, social, and ethical matters, while promoting integrity, stakeholder engagement, and respect for data privacy across all Euronext group companies.
Target Audience		Public & employees
Classification		Public
RACI	Responsible / Document owner	Group ESG
	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) Environnemental Policy Responsible and Sustainable Product Offering Policy Human Rights Policy Diversity, Inclusion and Anti-Discrimination Policy Social Dialogue Policy Health, Safety and Ways of Working Policy Talent Acquisition and Development Policy Whistleblower Policy Data Protection Policy Cyber Security Policy Code of Business Conduct Ethics Anti Bribery Policy
Regulations and frameworks linked to this document		Corporate Sustainability Reporting Directive (CSRD) and the relevant European Sustainability Reporting Standards (ESRS) Global Reporting Initiative (GRI) Sustainable Development Goals (SDGs) Net Zero Financial Stock Exchange
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.
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VERSION CONTROL

REVISION NO./ VERSION NO.	DATE	AUTHOR	APPROVAL	CHANGE DESCRIPTION
3.0	09/02/2026	Group ESG	Managing Board of Euronext N.V.	Third Version

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1. OBJECTIVES, OWNERSHIP AND GOVERNANCE

1.1 OBJECTIVES

Every organisation has a unique role to play in the transition to a sustainable society, depending on its impact and its opportunities. With a special position in the financial ecosystem, Euronext connects European economies to global capital markets, to accelerate innovation and sustainable growth. It has the ambition to build the leading market infrastructure in Europe and the purpose to shape capital markets for future generations.

Yet, for these efforts to truly have meaning, we need a planet that can accommodate the very future we are working towards. Euronext is fully committed to accelerating the European trajectory towards sustainable growth, both through its own operations and through its role in empowering sustainable finance.

1.2 OWNERSHIP

This Policy 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.

The Euronext's Sustainability Policy is implemented and facilitated by the Group Head of ESG & Sustainable Finance and supported by all relevant departments and business lines. The policy is owned by the General Counsel.

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.

2. DETAILED DESCRIPTION

2.1 SCOPE

This Policy 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 SUSTAINABILITY GOVERNANCE

Euronext's ambition to become a major player in promoting a sustainable economy, it must equip itself with the appropriate governance in place.

This section focuses on how Euronext oversees sustainability matters.

2.2.1 Two-tier governance structure

Euronext has a two-tier governance structure in accordance with Dutch law, composed of a Managing Board and a Supervisory Board. The Managing Board is responsible for developing and implementing the Company's strategy, as well as assuring the day-to-day operations, and is composed of executive directors.

The Managing Board is supervised by the Supervisory Board composed of non-executive directors, the majority of whom are independent, including the Chair. The Supervisory Board is responsible for the supervision of the policy of the Managing Board and the general course of affairs in the company and the business affiliated with it, and for advising the Managing Board. Key decisions require the approval of the Supervisory Board.

Both the Supervisory Board and the Management Board have fully endorsed ESG as transversal enabler to the "Innovate for Growth 2027" strategic plan and are regularly updated and trained on this critical topic.

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. The responsibilities of the Supervisory Board regarding impacts, risks, and opportunities align with the mandates of its committees and are explicitly outlined in their charters or, where applicable, at the board level.


SUPERVISORY BOARD (NON-EXECUTIVE)
 The Supervisory Board has oversight and accountability for IROs and DMA process through its committees or directly as part of its general oversight especially on:

 **Climate change, working conditions and sustainable products and services including training**

 **40%**
Women

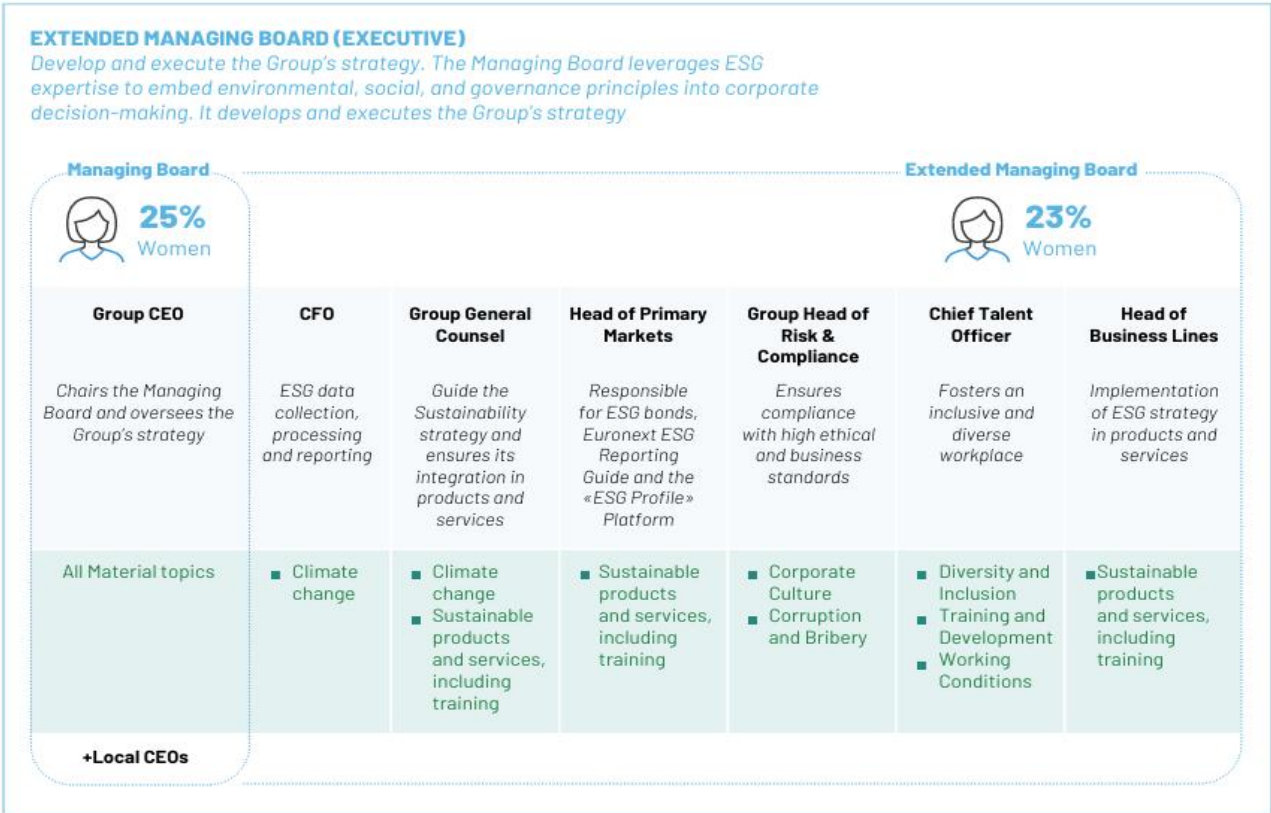
 **70%**
Independent members

Audit Committee	Risk Committee	Remuneration Committee	Nomination and Governance Committee
<i>Supervises the reporting of financial and non-financial information. Monitors the compliance with applicable normative frameworks</i>	<i>Assesses ESG risk assessment and internal control processes for all the material topics</i>	<i>Proposes ESG-related performance criteria for all the material topics</i>	<i>Oversees talent leadership and culture, including criteria for board selection and succession planning</i>
All Material topics			<ul style="list-style-type: none"> ■ Training and development ■ Diversity and Inclusion ■ Corporate culture ■ Corruption and Bribery
<ul style="list-style-type: none"> ■ Corruption and Bribery 			

 Material topics

At the Managing Board level, each area of sustainability is guided by specialized expertise, aligning skills with Euronext’s material impacts, risks, and opportunities. The General Counsel, part of the Group’s Extended Managing Board and the Executive Committee, is responsible for coordinating ESG efforts at the Group level with the assistance of the Group Head of ESG and Sustainable Finance. This coordination ensures that all relevant departments integrate ESG

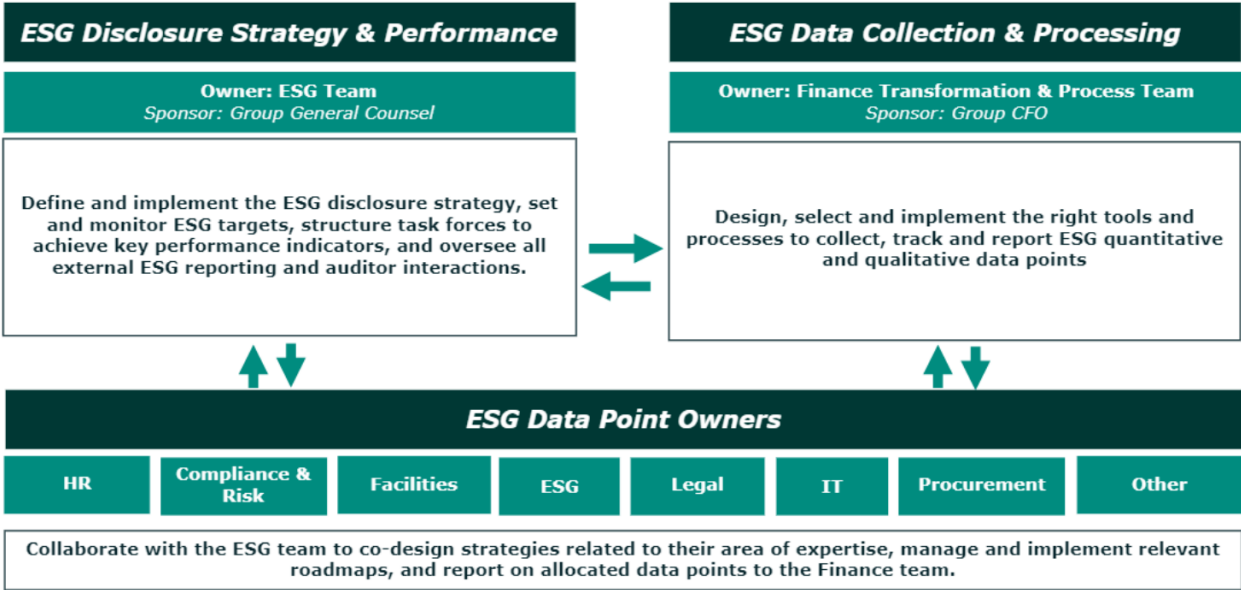
objectives into their missions. Additionally, the Chief Financial Officer is responsible for the collection and disclosure of non-financial data.



 Material topics

2.2.2 Non-financial reporting

With regards to non-financial reporting, the General Council, with the help of the Group Head of ESG, oversees defining ESG disclosure strategy including the full DMA process and monitoring and improving sustainability performance. The CFO, with the help of the Head of Finance Transformation and Processes, oversees non-financial data collection and processing. Both are supported transversally throughout the company by the relevant functions.



There is an ESG Disclosure Strategy and Performance SteerCo, organized quarterly, which is responsible for defining and validating ESG targets and publicly reported disclosures in accordance with existing regulations and Euronext’s ESG strategy. It monitors the performance of ESG KPIs, oversees the delivery of implementation roadmaps to ensure targets are met, and tracks progress in Euronext’s ESG ratings and awards. The SteerCo includes the General Counsel, Head of ESG, CFO, Head of Finance Transformation and Processes, Head of Procurement, Chief People Officer, and Head of Compliance and Risk.

Ad hoc Projects Committees and Task forces are structured based on priorities. Progress are reported quarterly to the ESG Disclosure Strategy & Performance SteerCo.

For the purpose of CSRD implementation, an ad hoc project structure with a monthly steerco has been created, led by the Head of Finance Transformation and Processes and comprises the CFO, the General Counsel, the Group Head of ESG, Chief Talent Officer, Head of Risk and Compliance, Head of Procurement and Finance Operations. The aim is to receive updates on project status and intermediate goals, monitor and supervise execution, take strategic decisions of common tasks and overall approach & sign off decisions on projects deliverables.

2.3 COMMITMENTS

Euronext is committed to continuously enhancing its sustainability reporting in alignment with its strategy, mission, and purpose.

With the evolution of non-financial reporting, Euronext is now fully compliant with the Corporate Sustainability Reporting Directive (CSRD) and the relevant European Sustainability Reporting Standards (ESRS).

While these frameworks form the foundation of Euronext’s sustainability reporting, the company also integrates additional elements to address requirements from sustainability rating agencies, stakeholder requests, and other topics highlighted by the Global Reporting Initiative (GRI) or the Sustainable Development Goals (SDGs), which Euronext continues to monitor and incorporate.

2.3.1 Environment

Euronext has set climate commitment involves Euronext setting science-based quantitative climate targets that will inform in-house climate action efforts, which have been validated by the Science-Based Targets initiative (SBTi):

- by 2030, Euronext will reduce its absolute Scope 1 and Scope 2 emissions by 73.5% compared to 2020;
- by 2030, Euronext will reduce its Scope 3 travel emissions by at least 46.2% compared to 2019;
- by 2027, Euronext suppliers, representing 72% of Euronext's greenhouse gas emissions derived from purchased goods and services, must set targets on their Scope 1 and Scope 2 emissions.

Further details are outlined in our Environmental policy and in our non-financial reporting. These targets position Euronext on a 1.5°C-aligned trajectory. They were established based on a previous greenhouse gas emissions base year and are therefore not yet reflected in Euronext's ESRS disclosures. In the context of the implementation of the ESRS framework, Euronext has defined a new emissions base year and will revise its climate targets accordingly to ensure full consistency with ESRS requirements. The revised targets will be disclosed within the relevant ESRS climate statements once finalised, in order to provide appropriate context and transparency to readers.

Pending the revision of these targets, Euronext confirms that its existing climate policies, measures and actions covering Scope 1, Scope 2 and Scope 3 emissions remain applicable and effective. These actions continue to underpin Euronext's climate transition trajectory and are considered sufficient to support the Group's long-term objective of achieving climate neutrality by 2050.

In the context of the newly announced strategic cycle "Innovate for Growth 2027", Euronext will go beyond the 'Fit for 1.5°' commitment by setting targets on achieving carbon neutrality by 2050 at the latest. To this effect, Euronext joins the Net Zero Financial Stock Exchange - SSE Climate Leaders initiative and published its first Progress report on its website. Euronext reaffirms its commitment to achieving carbon neutrality and aims to set science-based net zero targets by 2027.

Euronext also adopts a responsible approach to environmental resources management, focusing on water efficiency and biodiversity protection. The company monitors water consumption across its buildings and data centres to ensure efficient use of natural resources and transparent reporting. In line with the TNFD framework and ESRS E4, Euronext integrates nature-related considerations into its activities, offerings and services.

Further details are outlined in our [Environmental policy](#) and in our [non-financial reporting](#).

Additionally, Euronext is actively committed to accelerating climate action by promoting sustainable products and services and facilitating the transition to a European economy aligned with a 1.5° trajectory.

Furthermore, as part of its "Fit for 1.5°" strategy to support the European economy to curb the global increases in temperatures from pre-industrial times, Euronext is committed to developing a range of climate-related products and services that support its clients to manage their own sustainable transformation toward a low-carbon economy

Further details are outlined in our [Responsible and Sustainable Product Offering](#) policy.

2.3.2 Social

2.3.2.1 Euronext employee relations

- Euronext is committed to foster a workplace in which all employees can fully express their potential and invest in their growth and development to help them achieve their ambitions and contribute to the success and sustainability of Euronext;
- respect and promote the human rights of all employees and contractors and all its workforce more globally and oppose to any forms of forced and child labour. See more in our [Human Rights policy](#);
- prohibit any form of discrimination, including gender, ethnicity, religion, sexual orientation, age, language, socioeconomic status, political, physical ability, experience and education. Diversity and Inclusion are embraced in every area of Euronext's people agenda. See more in our [Diversity, Inclusion and Anti-Discrimination policy](#);
- respect the right of association and recognises collective agreements. Euronext is particularly committed to social dialogue, supporting unions' representation rights and facilitating worker representation bodies. See more in our [Social Dialogue policy](#);
- provide its employees with a healthy work environment where their mental and emotional wellbeing is respected. See more in our [Health, Safety and Ways of Working policy](#).

2.3.2.2 Training and Development

Euronext considers ESG training important for all employees to acquire the skills needed to perform the duties assigned to them.

Euronext ensure ESG training is delivered to all divisions and all employees, via workshops, online webinars and with materials that can be accessed on its platform Euronext Academy.

On a more focused level, Euronext strategically analyses each business unit's needs in this regard to deliver tailored programmes that fit their needs.

In addition, as part of the annual objective setting exercise, all Euronext managers are requested to provide an ESG objective for their team members. The annual discretionary bonuses for employees that are linked to their individual performance are also based on the achievement of their ESG objectives. All members of the Managing Board have a 10% Short Term Incentive objective linked to ESG performance.

See more in our [Talent Acquisition and Development policy](#).

2.3.2.3 Community relations

Euronext Foundation: The Euronext Foundation aims to foster Euronext's support of local sustainable communities and projects across Europe in the fields of financial literacy, diversity and inclusion in finance, and marine resources. It acts as an umbrella encompassing Euronext's philanthropic and educational support via dedicated funding and volunteering initiatives to empower young people, promote sustainability, and strengthen our connections with local communities.

Encouraging Corporate Social Responsibility Participation: Through training, volunteering, charitable activities and thought leadership, Euronext employees can contribute in three main areas that are relevant to our business: financial literacy, diversity & inclusion in finance and ocean protection. Different frameworks enable them to do so, including:

- All Euronext employees are encouraged to benefit from two paid volunteering days per year to engage in charity and community work through the organisations supported by the Euronext Foundation.

- Possibility for all employees to join Euronext ESG Champions and Euronext Diversity & Inclusion networks of volunteers and play a concrete role in shaping the Group's strategy

Possibility to be a mentor or professor in one the many financial literacy initiatives supported by Euronext, including the Euronext Blue Challenge organised in partnership with JA Europe.

2.3.2.4 Dialogue with shareholders and stakeholders

- Maximum transparency of information is a fundamental pillar for Euronext value creation. To this end, Euronext:
- 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.
- ensures that 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.
- ensures channels of dialogue with its main stakeholders in order to gather all relevant opinions: employees, clients, suppliers, authorities, regulators, and supervisors.

2.3.3 Governance

2.3.3.1 Integrity and Ethical conduct

Euronext upholds a zero-tolerance policy on bribery and corruption, unequivocally prioritizing ethical conduct over any business gain. We are committed to:

- Forgoing business opportunities rather than engaging in corrupt practices, and fully supporting our employees in adhering to this principle.
- Requiring all partners and vendors to comply with anti-corruption standards and implement robust controls to prevent unethical practices.
- Conducting business in strict adherence to applicable sanctions laws, including the CFSP of the European Union and U.S. sanctions programs, among others.

2.3.3.2 System and reporting Channels

To ensure the integrity of our operations, Euronext:

- Maintains robust systems to identify, mitigate, and address bribery and corruption risks effectively.
- Encourages employees and stakeholders to report unethical conduct via confidential channels as outlined in the Whistleblowing Policy and Procedure, with assurances against retaliation for good-faith reporting.

2.3.3.3 Business Ethics and Conduct

Our Code of Business Conduct and Ethics sets the highest standards of ethical behavior for all employees, contractors, and board members, serving as the foundation of our corporate culture.

2.3.3.4 Data Privacy and Protection

Euronext is committed to safeguarding personal data and ensuring privacy in full compliance with applicable laws, as specified in our Personal Data Protection Policy.

Overall, Euronext's commitments to environmental stewardship, social responsibility, and robust governance reflect its dedication to building a sustainable future. Additionally,, Euronext

is committed to put in place the necessary processes, involving all the appropriate departments and businesses, to embed transversally ESG in the whole Group's activities:

- **Strategy:** The Group has a clear sustainability strategy plan with precise objectives, approved by the Managing Board and Supervisory Board. The strategy is monitored on a frequent basis through key performance indicators and metrics. The Group's sustainability strategy is reassessed on a regular basis to ensure that it remains aligned with the Group's ambition and takes into account new developments around material sustainability-related topics that could affect Euronext's activities and stakeholders.
- **Internal audit:** All audits conducted by the internal audit team integrate an ESG section, ensuring that ESG is considered for every dimension of our business and organisation.
- **Sustainability risk management:** sustainability risks are integrated into Euronext's risk analysis framework. The objective is to ensure that potential sustainability risks are appropriately analysed. A Head of ESG Risk for the Group was appointed in January 2023.
- **Legal:** Euronext ensures that its sustainability approach complies with relevant international frameworks and standards such as the UN Sustainable Development Goals (SDGs), the UN Global Compact Principles, and the OECD Guidelines for Multinational Enterprises. In addition, Euronext is compliant with all local sustainability-related rules in the countries where it operates.