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SUSTAINABLE LOBBYING POLICY

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DOCUMENT SUMMARY

Document type		Policy
Purpose of the document		To set out Euronext's principles and governance for responsible and transparent lobbying, including compliance with applicable laws and ethical standards, and its approach to seeking alignment of direct and indirect climate-related lobbying with the objectives of the Paris Agreement.
Target Audience		Public & employees
Classification		Public
RACI	**Responsible / Document owner**	Chief Policy Officer, supported by the Government Affairs Department and 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 documentation		Universal Registration Document (URD) Code of Business Conduct and Ethics
Regulations linked to this document		Applicable lobbying laws, codes of conduct and standards; EU Transparency Register Code of Conduct; Paris Agreement; Science Based Targets initiative (SBTi) commitments.
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
0.2	28/09/2026	Chief Policy Officer, Government Affairs, Group ESG	Managing Board of Euronext N.V.	Second version

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1. OBJECTIVES, OWNERSHIP AND GOVERNANCE

1.1 OBJECTIVES

Through this policy, Euronext aims to:

- Set out the principles governing its participation in public decision-making at national and European Union levels, ensuring awareness of the Group's activities and interests while respecting the legitimacy and interests of other stakeholder representatives.
- Promote responsible and transparent lobbying in compliance with applicable laws, codes of conduct and ethical standards, including the prevention of conflicts of interest and the communication of reliable, verifiable and up-to-date information.
- Establish clear responsibilities for the management, coordination and validation of lobbying activities, including engagement through intermediaries and trade associations.
- Seek to ensure that its climate-related lobbying activities across its jurisdictions are aligned with the objectives of the Paris Agreement, including the goal of limiting global temperature rise to 1.5°C above pre-industrial levels.

1.2 OWNERSHIP

The Chief Policy Officer, alongside the Government Affairs Department, is responsible for the management of Euronext's lobbying activities, particularly the articulation of the Group's position externally and the design and execution of lobbying initiatives.

The Government Affairs Department works closely with relevant business representatives and support functions. Oversight of direct and indirect climate-related lobbying activities is coordinated between the Chief Policy Officer and the Head of ESG.

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

As a leading financial markets infrastructure provider, Euronext believes it is its duty to be proactive and take part in the public decision-making process in the countries in which it operates as well as at the level of the European Union institutions. This is how we ensure awareness of the Group's activities and interests while respecting the legitimacy of other stakeholder representatives and the interests that they represent.

Euronext's Chief Policy Officer establishes a list of persons within the Government Affairs Department authorised to lobby as part of their formal professional duties and ensures they have the training and experience required to exercise such activity. Lobbying activity at European and national levels is also supported by Managing Board Members, including local CEOs, business representatives and other support functions, particularly for their strategic and technical expertise.

All employees engaged in lobbying are made aware of the laws, codes of conduct and standards that apply to this activity in their locations. Employees engaged in lobbying must inform the Chief Policy Officer should they encounter a real or potential conflict of interest situation that could influence or could be perceived as influencing the relationship between Euronext and public decision-makers involved in public policy.

The Euronext Chief Policy Officer is responsible, alongside the Government Affairs Department, for the management of lobbying activities, particularly the articulation of the Group's position externally and the design / execution of lobbying initiatives. The Chief Policy Officer is part of the Executive Committee and is accountable to the Euronext Group CEO and the Managing Board for the validation of lobbying strategy and plans, particularly in respect of those areas identified as priorities for the Group.

In terms of the practical elements of this work, the Government Affairs Department works closely with representatives from the businesses concerned to draft positions and design lobby initiatives. These are subject to sign-off by the Heads of Business and ultimately by the Managing Board. This structure is also used to frame engagement with, and contributions to, the trade associations of which Euronext is a member.

Euronext seeks to ensure that its climate-related lobbying activities across its jurisdictions are aligned with the objectives of the Paris Agreement, including the goal of limiting global temperature rise to 1.5°C above pre-industrial levels.

Oversight of Euronext's direct and indirect climate-related lobbying activities is coordinated between the Chief Policy Officer and the Head of ESG. The Head of ESG engages with the Chief Policy Officer, as appropriate, to discuss climate policy advocacy priorities and their consistency with Euronext's sustainability objectives, including its SBTi commitments. Where relevant, new climate-related advocacy initiatives or material policy issues may be brought to the attention of the Head of ESG and the ESG team for discussion.

Euronext also periodically reviews the climate-related advocacy positions of trade associations and industry bodies of which it is a member, with a view to understanding the extent to which such positions are aligned with the objectives of the Paris Agreement. Where potential areas of misalignment are identified, Euronext may engage with the relevant organisation to better

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understand its position and, where appropriate, encourage greater alignment. Depending on the circumstances, Euronext may also review its continued participation in the organisation concerned.

Euronext ESG Policies and Statements

We commit to respecting laws applicable to lobbying, as well as applicable codes of conduct and standards. Whenever they impose higher standards than those set out in this policy, they should always apply. If, by contrast, this policy provides for a higher standard, it should prevail, unless this results in illegal activity. Euronext abides by the EU Transparency Register Code of Conduct. Euronext does not make any contributions to political parties, politicians or related institutions that collect political funds. Furthermore, we make sure our charity contributions and other philanthropic actions do not constitute "hidden" contributions. We respect Euronext's bribery policy as disclosed in our Code of Business Ethics and Conduct, namely with regards to gifts and entertainment, in our relationship with public decision-makers.

We only communicate reliable, verifiable and up-to-date information and positions and we abstain from communicating information to third parties and / or officials from public institutions that is deliberately misleading or obtaining information through illegal means. We respect the independence of experts in order not to influence the integrity and objectivity of scientific opinions and do not engage in activities to induce public officials to contravene the rules of behaviour applicable to them. Whenever we use intermediaries, we communicate our responsible lobbying commitments to them and require them to respect them. These intermediaries need to clearly disclose that they represent Euronext's interests.

We support the adoption of lobbying best practices, within the professional associations of which we are members. We reserve the right to express our dissent whenever we do not share the positions taken by these professional associations. We abstain from recruiting former public decisionmakers before the end of applicable statutory periods or from retaining active public decision-makers to represent our interests and we respect their confidentiality obligations.
More information on our advocacy work at European level can be found on the EU Transparency Register and / or the Government Affairs section of the Euronext Group website. In particular, information is disclosed on: (i) the main legislative proposals and policies followed by Euronext, (ii) our contributions to public consultations and public position papers, (iii) Euronext participation in EU structures and platforms, (iv) Euronext memberships of associations and networks, and (iv) estimated level of resources dedicated to advocacy work.

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