



EURONEXT SECURITIES

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DOCUMENT SUMMARY

Document type		Policy
Purpose of the document		To promote a balanced representation of qualifications, expertise, gender and other diversifying factors in the Board of Directors and the management.
Target Audience		The public
Classification		Public
RACI	Responsible / Document owner	Legal
	Accountable	Board of Directors, Euronext Securities Copenhagen
	Consulted	Compliance HR
	Informed	N/A
Reference to related documentation		N/A
Regulations linked to this document		Central Securities Depository Regulation (CSDR) (EU) 909/2014, art. 27 Act on target numbers and policies for the underrepresented gender (DK) 568 of 10/05/2022

VERSION CONTROL

VERSION NO.	DATE	AUTHOR	APPROVAL	CHANGE DESCRIPTION
1.0	10 December 2018	Legal	Board of Directors VP Securities	New policy due to CSDR
2.0	9 December 2019	Legal	Board of Directors VP Securities	Annual update of policy
3.0	12 July 2022	Legal	Board of Directors Euronext Securities Copenhagen	Policy updated due to migration into the Euronext Group.
4.0	7 December 2023	Legal	Board of Directors Euronext Securities Copenhagen	Policy updated due to implementation of new Danish act.

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1. OBJECTIVES, OWNERSHIP AND GOVERNANCE

1.1 OBJECTIVES

Background

According to CSDR art. 27 (4), the management body (the "Board of Directors") shall be composed of suitable members of sufficiently good repute with an appropriate mix of skills, experience and knowledge of the entity and of the market. The non-executive members of the management body shall decide on a target for the representation of the under-represented gender in the management body and prepare a policy on how to increase the number of the under-represented gender in order to meet that target.

Alongside CSDR, Danish law provisions on target numbers and policies for the underrepresented gender is also in scope for this policy. The purpose of these provisions are to promote policies that must ensure equal gender distribution in the management.

Objectives

The objective for the Diversity Policy ("Policy") for the Board of Directors of Euronext Securities Copenhagen (the "Company") is to promote a balanced representation of qualifications, expertise, gender and other diversifying factors in the Board of Directors.

The Policy also includes the non-executive members of the Board of Directors' policy and targets in relation to the under-represented gender in the Board of Directors as well as management.

1.2 SCOPE AND OWNERSHIP

Scope

The Policy supports compliance with CSDR and any local regulatory and legal requirements, and concerns the composition of Company's Board of Directors and management.

The Policy supports and comply with the Euronext Diversity Policy.

Ownership

Legal is responsible for maintaining the policy and to obtain approval from the Board of Directors, if the Policy is amended.

Compliance shall monitor that this policy is implemented and report non-compliance with the Policy to Board of Directors.

1.3 GOVERNANCE

Responsibility and tasks of the Board of Directors in connection with this policy

The Board of Directors are responsible for defining the requirements on representation of qualifications, expertise, gender and other diversifying factors in the Company.

Responsibility and tasks of the Management in connection with this policy

The Executive Board (CEO) must set a target figure for the proportion of the underrepresented gender at the Company's "Other Management Levels", as defined in Appendix A – Management Levels.

Reporting on this Policy

The target, this Policy and its implementation shall be made public.

The composition of the Board of Directors' diversity of qualifications, expertise and gender will be reported on in conjunction with the Company's annual report. The annual report will also include statistics on the gender distribution in the Company on Other Management Levels and information on the Company's target figures and this Policy, including a status on the gender distribution.

Legal will ensure performance evaluation for the Board of Directors. On this basis, a recommendation concerning any measures to replace or expand the expertise of the Board of Directors will be made by the Board of Directors.

Compliance shall on annual basis report back to Board of Directors on compliance with this Policy.

2. DETAILED DESCRIPTION

The Board of Directors supports the commitments, recognitions and goals set out in the Euronext Group Diversity Policy. The Euronext Group Diversity Policy has the following wording:



EURONEXT DIVERSITY POLICY

Euronext is a multinational financial markets company born from the coming together of market exchange activities in Belgium, France, the Netherlands, Portugal, the United Kingdom and Ireland. The federal governance model is central to its organisation, and naturally creates an environment where people of diverse cultures and backgrounds collaborate and drive the organisation forward. Our employees are spread across the 6 core European markets and offices in 8 additional countries in Europe, North America, and Asia.

Our long-standing commitment to diversity is entrenched in our Corporate values, particularly that of "Unity" which encompasses three main elements:

- We respect and value the people we work with
- We are unified through a common purpose
- We embrace diversity and strive for inclusion

Diversity at Euronext includes gender, ethnicity, religion, sexual orientation, age, language, socioeconomic status, physical ability, experience and education. Creating an environment where diversity is recognised, valued and can flourish, not only benefits Euronext's employees but also the success of the business. Euronext firmly believes that a wide array of perspectives and approaches promotes innovation and creativity, and enables us to better understand and address the needs of our customers, strengthening our client-centric approach and reputation.

Gender diversity

Euronext is committed to achieving balanced gender representation on its Supervisory Board and Managing Board with at least 30% of seats occupied by each gender.

For all of its recruitments across the Group, while complying with local legislation and regulation, Euronext will select the best candidates based on merit and objective criteria and take into consideration the benefits of a diverse talent pool.

Euronext fully recognises that it is also by recruiting, developing and retaining women in the Euronext workforce, and in the wider business community, that we will be able to promote more women to senior positions. All our people practices support this objective.

In general

Euronext commits to ensuring an inclusive environment for all forms of diversity by:

- promoting diversity and inclusion both internally and in the wider community through training, communication, and CSR initiatives
- attracting, retaining and developing a diverse array of talents by continuously improving its recruitment, development and retention policies
- complying with the legislation and regulations applicable to Euronext in all locations where it is present and conducts business

In order to reinforce diversity and inclusion, concrete improvement actions are implemented with input from managers and employees. Progress is reviewed regularly by the management bodies and action plans are subsequently updated to reflect new actions and objectives.

Euronext also has a clear and unambiguous anti-discrimination policy. Discriminatory behaviour and language, whether from managers or employees, is strictly prohibited under any and all circumstances. Employees are encouraged to report any serious breaches through the company's whistleblowing channels, and of course can also refer to his or her HR Business Partner.

Approved by Euronext Managing Board on 12 February, 2018

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In order to ensure compliance with CSDR, local legislation and regulation, as well as the Euronext Group Diversity Policy the following is set out:

Competence profile of the Board of Directors

The Board of Directors' policy is to have a balanced composition of the members of the Board of Directors that closely reflects and supports the Company's strategic ambitions at all times. The competence profile of the Board of Directors includes competences and qualifications of a personal, professional and market-related nature.

The goals and policy concerning the under-represented gender

The non-executive members of the Board of Directors has decided on a target for the representation of the under-represented gender being 40 % or the number closest to 40 % without exceeding 40 %.

In accordance with the target today the Board of Directors has two female members.

The target for the gender balance in the Other Management Levels is a distribution between men and women, where the under-represented gender represents at least 40 % or the number closest to 40 % without exceeding 40 %.

For a description of the management levels in the Company reference is made to Appendix A.

3. REASSESSMENT OF THE POLICY

The Board of Directors will reassess its target and composition of its members on the recommendation of Euronext N.V., or upon request from a member of the Board of Directors.

The Executive Board (CEO) will reassess its target and composition of its management on the recommendation of Euronext N.V., or upon request from a member of the Board of Directors.

APPENDIX A: MANAGEMENT LEVELS

A.1 DESCRIPTION

Euronext Securities Copenhagen (the "Company") shall ensure a well-defined description of the Other Management Levels which clarify which management levels in the Company that are covered by the target figures and the Diversity Policy. Further, it must be possible to effectively monitor target fulfillment and other principles determined by the Company.

According to the law, the requirement to set targets and to implement a policy does not apply if the Company either in advance or at a later stage meets the target of equal gender distribution at the relevant management levels. In this respect, an "equal gender distribution" means a distribution that is at least 40/60.

A.2 MANAGEMENT LEVELS

Management is defined as the governing body, being the Board of Directors and the Company's Other Management Levels.

Where the Other Management Levels has the following meaning:

The Company's Other Management Levels consists of two levels. The first level of management is the Executive Board (CEO). The second level of management includes managers with personnel responsibilities, who report directly to the first level of management. In this respect, "personnel responsibilities" only exist in relation to employees of the same legal entity in which the manager is employed.

Note that persons that are acting managers in accordance with the Euronext United in Diversity Group Matrix Policy but are not employed by Company are not included in the gender distribution calculation.