

Sustainability policy

Every organisation has to play its particular role 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 supports 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. This policy sets out our commitments which are reviewed systematically to ensure compliance with international best practices.

Responsibility

Euronext's Sustainability Policy is implemented and facilitated by the Group Head of ESG.

Scope

Euronext's ambition being to become a major player in promoting a sustainable economy, it must equip itself with the appropriate governance, strategy, and resources. In addition, Euronext must ensure that all its employees and executives are regularly trained on sustainability issues and understand the various regulatory, scientific, economic and social developments surrounding these topics. In order for the Group to adopt and maintain a business practice consistent with its ambition, Euronext has a strong governance in place.

This Policy describe Euronext's organisation to achieve its ESG commitments.

Reminder: ESG Commitments Environmental

"Fit for 1.5°" is Euronext's commitment to developing services and products that help its business, partners, clients and the European economy in general to curb the increase in global temperatures from pre-industrial times. The Company's goal is to help ensure this increase remains below the 1.5°C target, as set out in the Paris Agreement. An integral part of the "Fit For 1.5°" 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):

1. by 2030, Euronext will reduce its absolute Scope 1 and Scope 2 emissions by 73.5% compared to 2020;
2. by 2030, Euronext will reduce its Scope 3 travel emissions by at least 46.2% compared to 2019;
3. 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](#).

Social

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 [Human Rights 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](#).

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](#).

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.

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.

Governance

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. 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. This is explicitly laid down in the charter of each committee.

Supervisory Board’s Committees				
<p>Supervisory Board</p> <ul style="list-style-type: none"> • Supervises and oversees the Group ESG strategy • Approves the annual report, including the ESG part of it 	<p>Nomination and Governance Committee</p> <ul style="list-style-type: none"> • Oversees talent leadership and culture including the company’s diversity and inclusion initiatives • Ensures that Supervisory Board members have the appropriate skills and expertise to oversee ESG risks and opportunities 	<p>Audit Committee</p> <ul style="list-style-type: none"> • Supervises the reporting of financial and non-financial information and makes sure the latter is accurate, comparable, and consistent • Supervises the selection process of Euronext’s external auditor, including in relation to non-financial information • Monitors Euronext’s compliance with applicable laws and regulations (including ESG) 	<p>Risk Committee</p> <ul style="list-style-type: none"> • Supervises and monitors Euronext’s future risk exposures including ESG risks • Reviews and approves the Group’s risk management framework which covers ESG risks 	<p>Remuneration Committee</p> <ul style="list-style-type: none"> • Prepares proposals for the Supervisory Board concerning the performance criteria (including ESG) to be included in the Managing Board’s remuneration

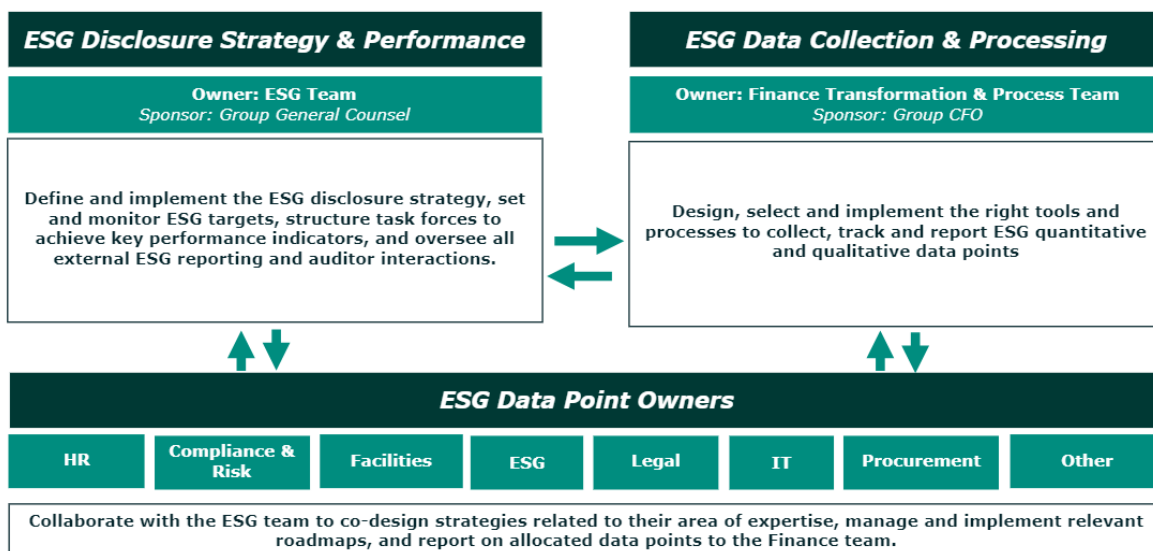
Both the Supervisory Board and the Management Board have fully endorsed ESG as core to the "Growth for Impact 2024" strategic plan of Euronext and are regularly updated on this important topic.

With the help of the Group Head of ESG, the General Counsel, part of the Group’s Extended Managing Board and the Executive Committee, is in charge of coordinating ESG at the Group level, making sure that all relevant departments integrate the Group’s ESG objectives into their missions. The General Counsel ensures that ESG initiatives, impacts and challenges are high on the agenda of the Group’s Managing Board and Supervisory Board.



Non-financial reporting

With regards to non-financial reporting, the General Council, with the help of the Group Head of ESG, is in charge of defining ESG disclosure strategy and monitor and improve sustainability performance. The CFO, with the help of the Head of Finance Transformation and Processes, is in charge of 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 will be structured based on priorities. Progress will be 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 launched, 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.

Overall, 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:

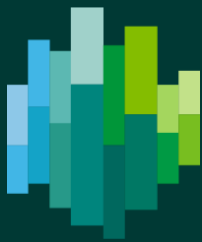
- **Strategy:** The Group has a clear sustainability strategy plan with precise objectives, approved by the Managing Board and Supervisory Board. The strategy is monitored on a frequent basis through key performance indicators and metrics. The Group's sustainability strategy is reassessed on a regular 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 Euronext's sustainability risks are appropriately identified and that relevant controls are in place to reduce or manage them in accordance with the group's appropriate risk level. 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.
- **Reporting:** Euronext publicly discloses the Group's sustainability performance at least once a year, in a fair, accurate and transparent manner. These disclosures include the non-financial report included in the Universal Registration Document (URD) and Task Force on Climate Related Financial Disclosures (TCFD) Report. In addition to the audit on financial statements, an external audit firm reviews and provides external reasonable assurance by an independent auditor on the nonfinancial information published as part of the URD. Euronext's ESG Statements and Policies are available on the Euronext website and reviewed at least once a year by the Managing Board of Euronext.
- **Encouraging Corporate Social Responsibility Participation:** Euronext supports community activities that have a direct, positive and measurable impact and that are aligned to our corporate values. 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. A number of different frameworks enable them to do so, including:
 - A policy of two volunteering days per year, allowing employees to engage in initiatives and associations supported by Euronext

- 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
- The possibility to be a mentor or teacher in one of the many financial literacy initiatives supported by Euronext, including the Euronext Blue Challenge organised in partnership with JA Europe.

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