

## EURONEXT SUPPLIER CODE OF CONDUCT

---

### ABOUT EURONEXT

Euronext is the leading pan-European market infrastructure, connecting European economies to global capital markets, to accelerate innovation and sustainable growth. It operates regulated exchanges in Belgium, France, Ireland, Italy, the Netherlands, Norway and Portugal. It has an unmatched blue chip franchise and a strong diverse domestic and international client base. Euronext operates regulated and transparent equity and derivatives markets, one of Europe's leading electronic fixed income trading markets and is the largest centre for debt and funds listings in the world. Its total product offering includes Equities, FX, Exchange Traded Funds, Warrants & Certificates, Bonds, Derivatives, Commodities and Indices. The Group provides a multi-asset clearing house through Euronext Clearing, and custody and settlement services through Euronext Securities central securities depositories in Denmark, Italy, Norway and Portugal. Euronext also leverages its expertise in running markets by providing technology and managed services to third parties. In addition to its main regulated market, it also operates a number of junior markets, simplifying access to listing for SMEs.

### EURONEXT VALUES

Euronext is conscious that it must lead by example in the way it does business. In this context Euronext seeks to reinforce its business integrity by striving to improve the service that it provides, making responsible decisions in how it manages its business, and actively managing the social and environmental impacts of what it does to help individuals, communities, businesses and economies progress and grow.

Euronext's goal is to drive excellence in these areas throughout its own organisation, and to support and influence positively the development of these areas in its supply chain.

Euronext is also committed to helping people achieve their ambitions, in the right way.

This purpose includes its clients and customers and is achieved through the demonstration of the Euronext values by those who interact with them:

---

#### Unity

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

---

#### Integrity

- We value transparency, communicate honestly and share information openly
  - We act with integrity in everything we do
  - We do not hide our mistakes and we learn from them
-

---

**Agility**

- We act with a sense of urgency and decisiveness
- We are adaptable, responsive and embrace change
- We take smart risks

---

**Energy**

- We are positively driven to make a difference and challenge the status quo
- We focus on and encourage personal leadership
- We motivate each other with our ambition

---

**Accountability**

- We deliver maximum value to our customers and stakeholders
- We take ownership and are accountable for the outcome
- We reward and celebrate performance

Accordingly, Euronext encourages its suppliers to partner with it in achieving this goal, by ensuring that all their employees and sub-contractors who interact with Euronext's personnel, clients and customers on Euronext's behalf, demonstrate these values and behaviours.

---

**PURPOSE**

The purpose of this Code of Conduct is to make sure that Euronext's suppliers share its philosophy regarding these areas and to encourage the suppliers to adhere to Euronext's philosophy.

---

**EURONEXT KEY PRINCIPLES**

Euronext supports the following principles and requires its suppliers to adhere to them:

- to comply with all applicable laws and regulations of the countries in which it operates;
- to support and respect the protection of internationally proclaimed human rights;
- not to be complicit in human rights abuses;
- to uphold the freedom of association and the effective recognition of the right to collective bargaining;
- not to make use of any forms of forced and compulsory labour or child labour;
- to prevent discrimination in respect of employment and occupation;
- to support a precautionary approach to environmental challenges;
- to undertake initiatives to promote greater environmental responsibility;
- to encourage the development and diffusion of environmentally friendly technologies;
- to work against corruption in all its forms, including extortion and bribery.

Euronext makes these principles key drivers of its purchasing policy.

---

## 1. Compliance with applicable laws and regulations

The supplier adheres to the principle that its business should be conducted in accordance with all applicable laws of the countries where it conducts its businesses and any other applicable foreign jurisdictions.

---

## 2. Environment, Social and Governance (ESG)

2.1. Euronext has the mission to connect European economies to global capital markets, to accelerate innovation and sustainable growth.

Euronext follows its mission by:

- driving investment in innovative, sustainable products and services through secure and transparent markets, in continuous collaboration with the financial community;
- inspiring and promoting sustainable tangible practices within the company and towards its communities, by respecting and developing its people and by supporting its ecosystem.

A complete overview of Euronext's ESG policies and statements can be found here: <https://www.euronext.com/en/about/esg-empowering-sustainable-growth/euronext-esg-policies-statements>

2.2 Euronext recognises that the management of environmental and social impacts is integral to good business practice. Euronext encourages its suppliers to join it in similar environmental, social and governance efforts and align with best practice activities including the following obligations to:

- maintain ESG policies, objectives or targets which as a minimum include commitments to identify, measure and reduce significant environmental and social impacts and strive to facilitate a more sustainable society by supporting the allocation of capital to sustainable initiatives to support a precautionary approach to environmental challenges;
- encourage the development and diffusion of environmentally friendly technologies;
- endeavour to reduce operational environmental impacts, such as the reduction of resource or water consumption, air emissions, management of hazardous materials, recycling and waste production;
- ensure working conditions show a high regard for employees' and contractors' health, safety and general wellbeing.

### 2.3 Euronext's science-based targets

Euronext group's primary greenhouse gas (GHG) emissions arise from energy consumption in its offices and data centres, from staff travel, and indirectly but mostly from its supply chain (purchase of goods and services, Scope 3). Euronext has a direct grip only on Scope 1, Scope 2 and travels.

Euronext has set science-based targets approved by the Science Based Targets Initiative:

1. By 2030, Euronext will reduce its absolute Scope 1, and market-based Scope 2 emissions by at least 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, suppliers responsible for 72% of Euronext emissions will have set targets on Scope 1 and Scope 2 emissions aligned with the science-based targets methodology.

Scope 1 emissions are the direct GHG emissions that occur from sources owned or controlled by the company.

Scope 2 emissions are indirect GHG emissions from purchased or acquired electricity and heat consumed by the company.

Scope 3 emissions are all other indirect emissions both upstream and downstream in an entity's value chain.

Refer to the [GHG Protocol Corporate Standard](#) for more information.

In line with these targets - and especially with the third one - any suppliers who has been identified and have been notified by Euronext as in scope for Euronext's supplier target must also comply with the following:

- Develop and implement plans and targets to reduce their greenhouse gas footprint.
- Set own 1.5°C aligned climate targets: suppliers must set a public target for reducing their emissions in alignment with the science-based 1.5-degree ambitions (<https://sciencebasedtargets.org/>) and actively work for achieving them.
- Measure and report progress. Suppliers must publicly report progress made towards achieving their 1.5°C aligned climate targets. Suppliers are expected to disclose complete, consistent, and accurate scope 1 and 2 (GHG) emissions data, verified by a 3<sup>rd</sup> party. If requested by Euronext, suppliers must provide plans to reduce greenhouse gas (GHG) emissions in alignment with Euronext's requirements.

Please find more information regarding Euronext's climate requirements for its suppliers on the dedicated [Sustainable supply chain webpage](#).

---

## 3. Human rights

Euronext is concerned by the protection of human rights around the world and is guided by fundamental principles such as those in the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) Core Conventions.

Euronext welcomes relationships with its suppliers as opportunities to improve and evolve practices with respect to human rights.

These behaviours and practices aim specifically:

- to support and respect the protection of internationally proclaimed human rights and to ensure not to be complicit in any abuses of such rights;
- to provide a safe and hygienic working environment that minimises health and safety

risks, bearing in mind the prevailing knowledge of the industry, the requirements of local health and safety laws and of any specific hazards;

- to ensure that all work is completed voluntarily;
- not – directly nor indirectly – to make use of child labour, whereby ‘child’ refers to any person less than 15 years of age (or 14 where the law of the country permits), unless the minimum age for work or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality; for work that by its nature or the circumstances in which it is carried out, is likely to harm one’s health, safety or morals, the minimum age is 18 years;
- to ensure that all workers are entitled to work and are paid for a minimum level of working hours, that working hours are not excessive and that maximum working hours comply with national laws;
- to be responsible for employee compensation and payment of fair wages; all employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher, and any overtime should be voluntary and compensated appropriately;
- to respect the rights of workers in relation to freedom of association.

---

## 4. Modern Slavery Act statement

Euronext N.V. and its subsidiaries and affiliates (collectively "Euronext") is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery position reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

---

### Our supply chain

Euronext’s supply chain largely consists of professional services providers such as consultants, accountants, law firms, contractors, software services, and data and content providers. Euronext also uses suppliers of IT and other office equipment providers, facilities management and publication distribution services.

Given the nature of Euronext’s business, we believe there is minimal risk of practices that support, facilitate or are complicit with modern slavery, within either Euronext or our supply chain. Nevertheless, we require that all vendors with whom we have a contractual arrangement explicitly agree to perform at the highest level of business and professional ethics.

---

### Due diligence and further steps

As part of our initiative to identify and mitigate risk we are exploring ways to ensure we:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains

Euronext has conducted a preliminary review of its suppliers and has determined that the majority operate in areas considered to be at low risk of supporting or being complicit in forced labour or human trafficking.

---

## 5. Diversity and inclusion

Euronext has a firm commitment to enable equality of opportunity and workplace cultures that promote inclusion. Euronext not only meets the basic legal requirements in every jurisdiction it operates in, but seeks to lead the way in this area. Euronext encourages its suppliers to partner with it to achieve excellence in equality, diversity and inclusion through:

- treating all employees with dignity and respect;
- adhering to the principles of equality, diversity and inclusion through all aspects of workplace management, giving clear consideration to equality of opportunity in employment;
- improving a culture of inclusion for each of their stakeholder groups;
- promoting a workplace free from discrimination, victimisation, harassment, physical or psychological violence or punishment, sexual exploitation or abuse, or any other form of inhumane treatment, inappropriate behaviour or abuse on any grounds;
- embedding relevant accessibility standards, innovation and best practice to deliver inclusive products and services to customers and stakeholders;
- encouraging commitment and the ability to support Euronext's aim to deliver products and services that meet the accessibility needs of its diverse customers and stakeholders, including the needs of people with disabilities;
- driving active management of downstream supply chains as part of their commitment so that the principles of inclusion and accessibility are encouraged through their supply chain;
- working with diverse businesses and ensuring inclusive sourcing activities and decisions within their own organisations.

## 6. Business integrity

The supplier is firmly committed to conducting business in full compliance with all applicable:

- anti-money laundering legislations, regulations, rules, etc. in order to prevent money laundering and terrorist financing and any activity that facilitates money laundering or the funding of terrorist activities;
- sanctions laws, including but not limited to the prohibitions and restrictions mandated by the sanctions programmes administered by the UK and the Common and Foreign Security Policy (CFSP) of the European Union;
- anti-bribery and anti-corruption laws; accordingly, the Supplier or any person acting on behalf of the Supplier may not give or promise to give money or anything of value to any executive, official or employee of any government, governmental agency, political party (including candidates for political office), company or other organisation or person if it

could reasonably be construed as being intended to influence a company business relationship with such entity or person; the Supplier nor any person acting on behalf of the Supplier may not make such payments to obtain or retain business or secure any improper advantage.

- obligations and legislations requiring the supplier to provide full transparency to Euronext and to comply with the Euronext and third parties' intellectual property rights, including but not exclusively when the service, system, solution, product is related or do embed an artificial intelligence system and component. In any event, the supplier is also obliged to comply with the obligations laid down in the EU AI Act 2024/1689.
- laws and regulations, in particular the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("GDPR"); the Supplier represents and warrants that Personal Data shall be at all times collected, processed and provided to Euronext in accordance with such laws and regulations. The Supplier undertakes, where relevant, to sign and execute any Euronext Data Processing Agreement (DPA) or applicable European Union Standard Contractual Clauses. The supplier shall indemnify and hold harmless Euronext against any loss, claim, procedure or penalty whatsoever arising from any breach by the supplier or by the Data Subjects of the supplier's foregoing representations and warranties.

---

## 7. Open-source software

Where a supplier is providing contractor resources to Euronext they must ensure that their employees or representatives are aware of the impact and potential consequences of using open-source software. Supplier shall comply with all relevant policies which relate to the use of open-source software and libraries within Euronext group.

If in doubt they should raise any concerns with Euronext's IT Risk and Audit team and/or the relevant Euronext Open Source Committee.

---

## 8. Reputation

The supplier will not damage the reputation or image of any company of the Euronext group.

---

## 9. Supplier's acknowledgement

By becoming a supplier with and by providing products, solutions, systems and/or services to Euronext the supplier commits to adhere to the principles and philosophy of the Supplier Code of Conduct throughout its relationship with Euronext in order to help Euronext to meet its values and principles as described in the Code of Conduct. Euronext may in its absolute discretion therefore terminate its relationship with any supplier in the case of material breach of the Code.

Euronext welcomes the supplier's initiatives to ameliorate this Code in order to achieve its goals.



**For the Supplier**

Company name:

Job title:

Signed by (print full name):

Signature:

Date: