

Nasdaq, Inc.

Global Human Rights Practices Statement

Nasdaq supports fundamental human rights—both inside and outside of our company—and we demonstrate our commitment by enacting responsible workplace practices across our global enterprise.

Nasdaq Guiding Principles

Nasdaq is committed to the principles in leading international standards including the United Nations (UN) Declaration of Human Rights; the International Labour Organization Declaration on Fundamental Principles and Rights at Work; the UN Global Compact; the UN Guiding Principles on Business and Human Rights; the UN Women's Empowerment Principles; and, the UN Lesbian, Gay, Bi, Trans, & Intersex People Standards. All Associates¹ are expected to conduct their work in a way that is consistent with these standards and principles.

Nasdaq believes in the fundamental dignity of every human being and the rights of every individual to live and work safely and humanely, without fear of oppression or coercion.

Our Purpose, Vision, Mission, and Values (set forth below), along with our Code of Ethics and Employee Handbooks, emphasize responsibility, integrity, and values-based decision-making and set forth our standards for conducting our business ethically and in a manner that is consistent with our moral principles. These standards and principles shape our interactions with fellow employees, clients, suppliers, communities, and markets around the world—and with our community of shareholders, too. They are foundational to our company and enable our continued success.

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Purpose

Our Purpose drives us to power stronger economies and contribute to a more sustainable world to help our communities, clients, and employees reach their full potential

Vision

We will be the trusted fabric of the world's financial system

Mission

We deliver world-leading platforms that improve the liquidity, transparency, and integrity of the global economy

Values²

Our commitment to ethical business is explicitly reflected in Our Value to Lead with Integrity but all of our Values should be read collectively as supporting ethical business practices

1. Nasdaq defines "Associates" as all employees, officers, directors, consultants or contractors working on behalf of Nasdaq or an affiliate

2. Our commitment to ethical business is explicitly reflected in Our Value to Lead with Integrity but all of our Values should be read collectively as supporting ethical business practices

Reflecting Nasdaq's obligations as a global company, Nasdaq has incorporated the following within its Code of Ethics, corporate policies, or program-specific requirements to put the guiding principles into practice:

- **Equal Employment Opportunity.**

Nasdaq is committed to creating a work environment that promotes personal and professional growth and that fully utilizes the abilities of its employees globally — regardless of age; race (including traits historically associated with race such as hair texture or protective styles, including but not limited to braids, locs, and twists), ethnicity, or color; national origin or ancestry (including caste); gender or sex (including but not limited to pregnancy, childbirth, breastfeeding, or medical conditions relating to breastfeeding, pregnancy, or childbirth, or parental leave), sexual orientation, gender identity and/or expression, or gender reassignment; religion; disability; veteran or military status; marital and/or civil partner/familial status, or reproductive health decisions; genetic information; or any other classifications that are protected in applicable local jurisdictions.

- **Non-Discrimination/Non-Harassment/Non-Retaliation.**

Nasdaq will not tolerate any form of unlawful discrimination, harassment, or retaliation by its employees towards any person, including other employees, contractors, vendors, customers, clients, or guests based on the classifications and characteristics noted above. This includes, but is not limited to, sexual, racial, workplace, online, or other forms of discrimination or harassment by or against any employees. Violations are subject to disciplinary action, up to and including termination of employment.

- **Respect and Inclusion.**

Nasdaq is committed to maintaining a work environment that values respect and inclusion of all. Employees are expected to respect each other, customers, suppliers, and others doing business with us regardless of any geographic or demographic differences.

- **Modern Slavery.**

Nasdaq is committed to ensuring there is transparency in our own business and in our approach to avoiding child labor, forced labor, prison labor or human trafficking including, but not limited to, any activities that are considered "modern slavery" under the UK or Australia Modern Slavery Acts. We are also committed to avoiding other human rights abuses through pre-engagement and continuous screening of all suppliers for activities including, but not limited to, activities that violate the rights of native or indigenous peoples. As set forth in our Code of Ethics and the Supplier Code Ethics, we expect the same high standards from all of our contractors, suppliers, and other business partners.

- **Freedom of Association and Collective Bargaining.** Collective bargaining is a fundamental right rooted in the International Labour Organization (ILO) Constitution and reaffirmed as such in the 1998 ILO Declaration on Fundamental Principles and Rights at Work. We respect our employees' right to freedom of association, and maintain a fair working environment for our employees and others, encouraging their full contribution to advancing our mission and vision. We observe laws and regulations around the world relating to freedom of association. Where such laws do not exist, we apply generally accepted industry practices consistent with local circumstances, and representation structures vary globally.
- **Data Privacy.** As set forth in our Code of Ethics and applicable privacy policies and statements, Nasdaq respects individuals' privacy rights as set forth in applicable law and only uses personal data as permitted for its business purposes.
- **Health & Safety.** Nasdaq endeavors to minimize the exposure of our employees, contractors, and other visitors to our facilities to health and safety risks. To accomplish this objective, employees and others working at or visiting our facilities are expected to maintain safe and healthy working conditions and to adhere to published operating practices and procedures. Nasdaq also maintains programs to help safeguard individuals working remotely and traveling as part of their work for Nasdaq.

SpeakUp! Program

Under our Code of Ethics, all Nasdaq associates are expected to report any violation of our policies or the law, including in relation to modern slavery. Under our SpeakUp! Program, which has been endorsed by our Chief Executive Officer, our employees, contractors, suppliers and others doing business with Nasdaq are provided multiple channels for confidentially and securely making a report regarding a violation, and all individuals making a report are protected from any form of retaliation.

These include our SpeakUp! Portal, which enables individuals to make anonymous reports of wrongdoing. Each report of suspected misconduct is investigated by appropriate groups within our organization and substantiated corrective action is taken if a policy violation occurred. For more information on our SpeakUp! Program, please see our Code of Ethics.

Operating in Global Communities

As a global company with operations in 38 countries, Nasdaq strives to model our principles wherever we operate and serve as a role model in locations where we do business. Our fundamental respect for human rights informs client engagements, the work we perform, the goods and services that we purchase and how we engage with the local business community as a corporate citizen. We periodically review this Human Rights Practices Statement and engage with a variety of stakeholders to integrate new experiences and to develop new practices when appropriate. We report on our progress in our [annual Sustainability Report](#).

Human Rights Assessment

In 2021, Nasdaq collaborated with an independent third-party to initiate a formal human rights assessment consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs). The assessment focused on:

- Outlining current expectations of financial institutions with regards to human rights;
- Building internal understanding of human rights; and
- Undertaking an initial, high-level gap analysis of Nasdaq's current policies and practices against the UNGPs, with recommendations on best practices.

The assessment, which evaluated our level of potential human rights risk exposure in the high-priority areas identified by the third-party assessment, determined that our human rights risk exposure is low. However, we understand that supply chains are complex and continually evolving and global human rights conditions change. We plan to periodically evaluate processes and technologies that could enable us to enhance our current risk monitoring capabilities in the future.

This statement reflects Nasdaq's expectations and aspirational standards for its own business. Specific current requirements for conduct are found within relevant provisions within the operative Nasdaq Code of Ethics, Employee Handbooks and company policies. The inclusion of a statement in this document does not constitute a representation regarding past or future performance. This statement relates only to Nasdaq's internal business operations. Nasdaq recognizes that one size does not fit all and that different standards are appropriate for different companies. Expectations and requirements for Nasdaq listed companies, exchange members and other market participants are found in the applicable rulebooks, published standards and applicable laws and regulations.

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