

Nasdaq Human Rights Practices Statement



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

Nasdaq Guiding 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 Vision, Mission and Values Statements, 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 consistent with our moral principles.

These principles and standards 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. Reflecting Nasdaq’s obligations as a global company, Nasdaq has incorporated within its Code of Ethics, corporate policies, or programs specific requirements to put these principles into practice:

OUR VISION

Reimagining markets to realize the potential of tomorrow.

OUR MISSION

We bring together ingenuity, integrity, and insights to deliver markets that accelerate economic progress and empower people to achieve their greatest ambitions.

OUR VALUES:

- We put **Clients First**
- We act with **Integrity**
- We are **Passionate**
- We lead **Innovation**
- We are **Effective**
- We are **Resilient**

- **Equal Employment Opportunity and Discrimination.** Nasdaq is committed to creating a work environment that promotes personal and professional growth and that fully utilizes the abilities of its employees—regardless of age, color, disability, national origin, ancestry, race, religion, gender, sexual orientation, gender identity and/or expression, veteran status, genetic information, or any other legally protected classification. Nasdaq prohibits discrimination based on any of these classifications.
- **Harassment.** Nasdaq does not tolerate any form of workplace, sexual, online or other harassment against any employee by any person, including other employees, temporary agency employees, contractors, vendors, customers, clients, couriers, or guests.
- **Non-Retaliation.** Nasdaq prohibits retaliation against individuals who have reported concerns, sought guidance, or cooperated in an investigation. Any employee that engages in retaliation is subject to disciplinary action, up to and including termination of employment.

- **Diversity & Inclusion.** Nasdaq is committed to maintaining a work environment that values diversity, equality and inclusion. We are focused on attracting, retaining, and promoting a diverse workforce. An affirmation of these principles manifests itself in a sense of belonging, which in turn enhances team cohesiveness and a commitment to the vision and principles driving Nasdaq. Employees are expected to respect each other, customers, suppliers, and others doing business with us regardless of their human differences and across dimensions of differences.
- **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 employees and others working or visiting our facilities are expected to maintain safe and healthful working conditions and to adhere to published operating practices and procedures. Nasdaq also maintains programs to safeguard individuals travelling as part of their work for Nasdaq.
- **Labor Standards.** Nasdaq is committed to operating a fair, inclusive, and supportive workplace. This commitment includes compliance with applicable laws regarding workplace conditions and rights in the jurisdictions in which we operate. Nasdaq adheres to laws related to the establishment of trade unions, works councils, or other employee representatives. Nasdaq strictly prohibits forced labor or activities that support human trafficking; Nasdaq is committed to compliance with the UK Modern Slavery Act and similar corresponding laws in other jurisdictions where we operate.

Operating in Global Communities

As a global company with operations in more than 50 countries, Nasdaq endeavors to model our principles wherever we operate serving as a role model 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 also learn from the communities where we live and work, and seek new ways to empower economic and social well-being.

We will periodically review this Human Rights Practices Statement to integrate new experiences and practices. We will engage with a variety of stakeholders on human rights related issues, and report on our progress in our Annual Sustainability Report. Any questions on this Statement should be directed to our Corporate Responsibility Team via email at NasdaqDIB@nasdaq.com.

This statement reflects Nasdaq's expectations and aspirational standards for its own business. Specific current requirements for conduct are found within relevant provisions 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 only; 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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