Nasdaq Human Rights Practices Statement
Reflecting our Values, 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 for Nasdaq 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 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 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.

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

Nasdaq Guiding Principles

<table>
<thead>
<tr>
<th>OUR VALUES</th>
<th>OUR MISSION</th>
<th>OUR VISION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• We put Clients First</td>
<td>We bring together ingenuity, integrity, and insights to deliver markets that accelerate economic progress and empower people to achieve their greatest ambitions.</td>
<td>Reimagining markets to realize the potential of tomorrow.</td>
</tr>
<tr>
<td>• We act with Integrity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• We are Passionate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• We lead Innovation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• We are Effective</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• We are Resilient</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

[1] Nasdaq defines “Associates” as all employees, officers, directors, consultants or contractors working on behalf of Nasdaq or an affiliate.
Reflecting Nasdaq’s obligations as a global company, Nasdaq has incorporated within its Code of Ethics, corporate policies, or programs 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—regardless of age, color, disability, national origin, ancestry, race, religion, gender, sexual orientation, gender identity and/or expression, veteran or military status, marital and/or familial status, genetic information, or any other actual or perceived legally protected classification or characteristic protected by law in any of the applicable 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 harassment by or against any employees. Violations are 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 seek to ensure we attract, retain, include, and promote diversity in our workforce daily. 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 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.
Operating in Global Communities

As a global company with operations in more than 50 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 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.

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 (UNGP). The assessment focused on:

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

Following the completion of this assessment, in 2022 we evaluated our level of potential human rights risk exposure in the high-priority areas identified by the third-party assessment and confirmed that our risk exposure is low. However, we understand that supply chains are complex and continually evolving and global human rights conditions change, and we will continue our vigilant human rights due diligence. We are evaluating processes and technologies that could enable us to enhance our current risk-monitoring capabilities in the future.