

# Supplier Code of Ethics



At Nasdaq, our mission is to bring together ingenuity, integrity, and insights to deliver markets that accelerate economic progress and empower people to achieve their greatest ambitions. Integrity, along with our commitment to ethical business, are reflected in our Vision, Mission and Values Statements.

**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**

As a supplier<sup>1</sup> to Nasdaq, you will be interacting with our staff and may even be acting on our behalf with customers, other suppliers, members of the public, and others doing business with us. As such, your actions can reflect on our business, people, and brand; further, as an integral part of our business “ecosystem,” you contribute to our workplace culture and our ability to comply with the wide range of laws and regulations that apply to our business. Accordingly, we view it as vital that you adhere to our values, standards, and compliance requirements in your dealings with Nasdaq personnel and your work related to our company.

The purpose of this document is to set out Nasdaq’s expectations for its suppliers regarding compliance with its ethics and compliance standards. Nasdaq expects that its suppliers share our commitment to ethics and integrity by complying

with the Nasdaq Supplier Code of Conduct (“Supplier Code”). Nasdaq understands that many companies have their own code of ethics that addresses the topics in this Supplier Code. Our expectation is not that suppliers replace their code with this Supplier Code, but rather that our suppliers ensure that they have consistent treatment in their code, address any Nasdaq-specific issues and requirements with their staff in supporting Nasdaq, and meet the reporting expectations in this Supplier Code. Compliance with this Supplier Code will be considered in decisions regarding continuing service with a supplier and also decisions regarding whether a particular individual can continue to perform services for Nasdaq<sup>1</sup>.

Questions about this Supplier Code should be directed to [SupplierRiskManagement@nasdaq.com](mailto:SupplierRiskManagement@nasdaq.com)

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<sup>1</sup>This Supplier Code is not a modification of any supplier agreement. It is subject to updating and modification at Nasdaq’s sole discretion.

## Compliance with Laws and Regulations

We expect our suppliers to comply with applicable laws and regulations when conducting business with Nasdaq, including but not limited to the following.

### I. SANCTIONS, EXPORT AND TRADE CONTROL COMPLIANCE

We expect suppliers to comply with sanctions-related requirements as governed by applicable laws and regulations. Nasdaq is committed to complying with restrictions that apply to its business including, but not limited to, sanctions that prohibit Nasdaq from:

- Operating in certain countries or locations
- Doing business with sanctioned entities or individuals (or entities owned or controlled by such individuals)
- Extending credit or facilitating certain types of credit or equity financing to sanctioned individuals or entities

### II. GIFTS, BUSINESS-RELATED EVENTS AND ANTI-CORRUPTION

Nasdaq expects suppliers to comply with our Code of Ethics gifts provisions as well as applicable corruption and bribery laws including, but not limited to, the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act in all work related to their services to or on behalf of Nasdaq. A supplier may not offer or accept a gift or other item of value involving Nasdaq personnel, customers or other suppliers in exchange for taking action or other favorable treatment under any circumstances. Nasdaq has a zero tolerance policy towards bribery and corruption. Any form of bribery in connection with Nasdaq business by our suppliers is unacceptable. Nasdaq is committed to upholding the requirements of the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the OECD Guidelines, and other international anti-corruption laws. Nasdaq expects suppliers and/or their personnel to report: (a) any requests for unpermitted gifts by Nasdaq personnel

related to the supplier's engagement, (b) any requests for a bribe, gift or other improper payment related to supplier's work for Nasdaq, or (c) any violation of applicable bribery or corruption laws related to supplier's work for Nasdaq.

### I. ANTITRUST AND FAIR COMPETITION

Laws in the U.S., Europe, and other jurisdictions where Nasdaq does business prohibit conduct that may prevent, restrict or distort competition, or that is otherwise unfair or deceptive. We expect that our suppliers comply with applicable antitrust and fair competition laws.

## Ethics and Responsible Business Practices

### I. MAINTAIN ACCURATE RECORDS

We expect suppliers to create and maintain accurate books and records and not to improperly delete, destroy, or remove, or falsify or otherwise tamper with such books and records. Records shall be retained in a manner consistent with applicable rules and regulations.

### II. SUSTAINABILITY

We encourage suppliers to adopt sustainability and environmental practices in line with our published Environmental Practices Statement. To the extent practical and feasible, we expect suppliers to provide us with information to support our reporting and transparency commitments related to sustainability and environmental impacts.

### III. CONFLICTS OF INTEREST

Suppliers and personnel performing services for Nasdaq are expected to adhere to all professional standards and codes governing conflicts of interest related to the services performed.

### IV. TRADING RESTRICTIONS

Suppliers may not use material non-public information, relating to Nasdaq or to any other company, obtained in the course of their business dealings with Nasdaq as a basis for trading, or enabling others to trade.

## V. CONFIDENTIALITY

Suppliers may not use, disclose, or retain confidential or proprietary information about Nasdaq or third parties (including Nasdaq's listed companies, member firms, customers, or partners) obtained in the course of their business dealings with Nasdaq beyond the terms and conditions stated in the supplier's contract with Nasdaq. Suppliers should take proactive measures to prevent the improper disclosure of confidential information. Any inadvertent disclosure of Nasdaq or third party confidential information, or concerns that the security of such information may have been compromised, must be reported to Nasdaq immediately.

## VI. PERSONAL DATA AND PRIVACY

We expect suppliers to comply with applicable laws and regulations relating to personal data and privacy. Nasdaq is committed to respecting and complying with laws and regulations that apply to the collection, use, distribution, destruction, and other processing of personal data (i.e., any data about an identified or identifiable individual).

## VII. SELF-REGULATORY OBLIGATIONS

As a Self-Regulatory Organization, Nasdaq employees and suppliers have a heightened and proactive responsibility to ensure regulatory integrity. We expect suppliers to report any suspicious conduct or potential rule violations relating to the markets we own and operate.

## Ethical and Open Work Environment

### I. HUMAN RIGHTS

We expect suppliers to conduct themselves consistent with our published Human Rights Practices Statement. Suppliers must adhere to applicable human right laws including, but not limited to, those related to forced labor, child labor, or human trafficking (such as the UK Modern Slavery Act).

### II. DIVERSITY, EQUALITY, AND INCLUSION

We expect suppliers to share in our commitment to maintain a work environment that values diversity, equality, and inclusion. Nasdaq does not tolerate discrimination or the denial of equal opportunity to anyone based upon the criteria protected under applicable law. Nasdaq is committed to a harassment-free workplace; suppliers are expected to behave in a professional and respectful manner. Any supplier personnel who believe they are subject to any harassment by Nasdaq personnel or others in the Nasdaq workplace may contact their procurement or business point of contact or may report their concern to our SpeakUp! Line consistent with our Code of Ethics.

## Our SpeakUp! Program

Where a supplier or its personnel has questions or needs guidance on how to apply Nasdaq's ethical principles, its Code of Ethics or other policies, it may seek guidance from its Nasdaq point of contact or call the Nasdaq SpeakUp! Line (contact information below). We expect suppliers and their personnel to report suspected misconduct related to Nasdaq's business, and/or any misconduct by Nasdaq employees to the relevant business contact, Strategic Sourcing representative or the Nasdaq SpeakUp! Line by calling the following telephone numbers:

**U.S. and Canada** 866-352-1946 (toll-free) | **Sweden** 020-889-294 (toll-free) | **Global** +1-330-765-4281 (toll)

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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