

Nasdaq UK Modern Slavery Act Transparency Statement

This statement is made on behalf of Nasdaq, Inc., and its subsidiary companies (“Nasdaq,” “we” or “our”) pursuant to Section 54 of the Modern Slavery Act 2015 of the United Kingdom (the “MSA”) for the financial year ending December 31, 2016.

At Nasdaq, our mission is: “We bring together ingenuity, integrity, and insights to deliver markets that accelerate economic progress and empower people to achieve their greatest ambitions.” To fulfill that goal, we have six Core Values that guide our actions as a global firm. One of these values is “We act with Integrity.” Specifically: “We embrace good governance by holding ourselves to the highest ethical standards in all of our interactions. We are a trusted partner to the investing public, our shareholders, regulators and our clients. In doing so, we strive to be open and informative in all of our interactions with our clients, stakeholders and each other.”

Accordingly, Nasdaq is firmly committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chains. This commitment is reflected in our Code of Ethics and supporting policies, our SpeakUp! Program, practices around screening employees and contracted staff, and our vendor diligence and risk management program. Reflecting our continuous improvement approach to every aspect of our business, we will continue to evolve these programs and implement new initiatives consistent with best practices in our industry, supporting the goals of the MSA.

Our Business and Organizational Structure

Beginning in 1971 as a primarily U.S.-based equities market, Nasdaq is now recognized around the world as a diversified financial technology, trading and information services provider to the global capital markets, with more than 4,400 colleagues serving businesses and investors from over 50 offices in 26 countries. Our business is comprised of four primary segments:

1. Market Technology represents Nasdaq’s commercial technology and software business. It provides exchange and business technology that supports our financial industry in all aspects of their business or marketplace
2. Market Services business segment is built on our market-leading technology. It brings buyers and sellers together in an open and transparent environment that represents one of the world’s largest networks of exchanges, operating in 29 markets worldwide, including one clearinghouse and five central depositories. We provide trading, clearing, settlement and depository services across cash equities, derivatives, fixed income, debt commodities, structured products, ETFs and other asset classes.
3. Corporate Services: This comprises a diverse selection of approximately 3,900 total listings with \$U.S. 12 trillion in market value. The companies that choose to list on our U.S., Nordic and Baltic exchanges, represent industries such as retail, health care, finance and technology. For smaller growth companies, we offer access to financial markets through our First North alternative marketplaces in Europe. In the U.S., Nasdaq Private Market (NPM) identifies partnership and support opportunities for private companies years before they may go public. In addition, our Corporate Solutions business provides private and public companies with a suite of communications, analytics and consultative services spanning investor relations, corporate leadership & governance, and public relations.

4. Information Services: Within our Information Services segment, comprised of market data and global index, our clients worldwide have the market insight and resources they need for market transparency and the most informed trading, investing and valuation decisions.

Nasdaq supports these business segments through integrated organization-wide support teams and functions.

Our Global Ethics Team is responsible for promoting integrity and ethical business practices throughout our organization. Its responsibilities include maintaining our Code of Ethics and related certification programs, conducting training and outreach, and providing employees and others doing business with Nasdaq secure and confidential means (such as our SpeakUp! Line) to report concerns and suspected misconduct.

We have an integrated vendor management and procurement program that supports our worldwide operations. This program includes a vendor risk management function which is overseen by a cross-functional Vendor Risk Steering Committee. Our supply chain includes professional and technical services, software and information technology, office supplies and office space for our personnel.

Nasdaq operates in the United Kingdom principally through its local subsidiaries: Boardvantage (UK) Limited, Marketwired UK Limited, Nasdaq Technology AB UK Branch, Nasdaq Corporate Solutions International Limited, Sybenetix Limited, NASDAQ OMX Europe Limited, NASDAQ OMX NLX Limited, Nasdaq International Limited, and Indxis Limited.

Policies, Training and Resources

Nasdaq's commitment to acting with integrity is reflected in our Code of Ethics and supporting policies. Under our Code of Ethics, all Nasdaq associates are expected to report any violation of our policies or the law. Under our SpeakUp! Program, which has been endorsed by our Chief Executive Officer, our associates and others doing business with us are provided multiple channels for confidentially and securely making a report and all reporters are protected from any form of retaliation. Each report of suspected misconduct is investigated by appropriate groups within our organization and where a violation of a policy is substantiated corrective action is taken.

Our Expense Management Policy and Vendor Engagement and Management Policy set forth our standards for engaging third parties related to our business. They require that employees reflect our Code of Ethics in retaining third parties to support our business. They also require that all significant purchases be coordinated through our Strategic Sourcing Team. These policies help ensure that our vendor diligence process described below is followed.

Each employee is required to annually certify compliance with our Code of Ethics. To support our commitment to ethical business, our Global Ethics Team conducts regular training with employees on compliance topics that are relevant to their role in our company. This is supplemented by on-demand resources that are available to employees on our intranet.

Employee Screening

As part of our hiring process, all employees are required to pass a background investigation and screening. The exact scope of screening depends on the country in which the individual will be working and the role that the individual will have relative to our business. All such screening includes evaluation for prior criminal conduct including offenses that may be related to trafficking or modern slavery.

Diligence and Monitoring of Suppliers

As part of our procurement and vendor management processes, Nasdaq conducts due diligence on each vendor that is engaged to support its business. In addition, Nasdaq has developed and continues to enhance its vendor risk management program to evaluate potential compliance, business and reputational risk related to our use of vendors. This program is overseen by a Vendor Risk Steering Committee led by senior management and is modeled on best practices in our industry for managing third party risk. Vendors that are rated as higher risk under this program will be subject to additional oversight and diligence under expected enhancements to this program to be implemented over the next year.

Vendors providing staffing and similar services are contractually required to comply with our Code of Ethics as part of their engagement with Nasdaq. Individuals providing services through such vendors who have access to our systems are also required to certify compliance with our Code and related policies. They are also required to undergo screening similar to that performed for employees that are hired in the geographic/function where they are working.

Assessment of Modern Slavery Risk to Our Business

In response to the enactment of the MSA, Nasdaq conducted diligence regarding the risk of modern slavery related to its business. Such evaluation involved participation from the Office of General Counsel, Strategic Sourcing, Human Resources and Facilities functions. Similar to the conclusion reached by other companies in our industry, Nasdaq believes that its operations and supply chain generally involve a low risk of modern slavery. However, we appreciate the importance of taking steps to combat all forms of modern slavery as well as the need to be vigilant in detecting and deterring any form of human rights violation committed in connection with our business operations.

Future Actions

Consistent with the continuous improvement model that we apply to our business, we will monitor and review our business for risk related to modern slavery and best practices employed by companies in our sector to prevent it. We will implement enhancements that our management considers appropriate based on such monitoring and review.

Thomas A. Kloet*

Director of Nasdaq, Inc.

*Signature on File