2024
Sustainability Report

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Letter from Chair + CEO

This is our tenth year publishing a sustainability report and as you'd expect, we've learned a lot over those years and evolved how we approach sustainability and report on it. One thing that has been clear from the beginning is the need for how we define and think about sustainability to be driven by our business and key stakeholders such as our employees, customers and shareholders. Our business does not exist, let alone grow, without engaged employees, satisfied customers and committed shareholders.

Understanding what sustainability issues present the greatest risks and opportunities for our business is a key tenet of keeping our eye on the ball. To do that we engage in regular conversations with our stakeholders and supplement that feedback with a formal materiality assessment every few years. Following our most recent refresh of that exercise, we confirmed that the topics most important for us to focus on and report on are:

- Human capital management
- Risk management – from cybersecurity to operational resiliency to regulatory compliance
- Environmental risks and opportunities

This report is built around these key topics and provides an update on the processes and governance we employ to manage them.

Thank you for your interest in this report.

Best
Jeff

Jeffrey C. Sprecher
Founder, Chair & CEO
Intercontinental Exchange

About us

ICE is a leading global provider of technology and data to a broad range of customers including financial institutions, corporations and government entities. Our products, which span major asset classes including futures, equities, fixed income and U.S. residential mortgages, provide our customers with access to mission critical tools that are designed to increase asset class transparency and workflow efficiency. Although we report our financial results in three reportable business segments, we operate as one business, leveraging the collective expertise, particularly in data services and technology, that exists across our platforms to inform and enhance our operations.

What we do

- **Exchanges:** we operate regulated marketplace technology for the listing, trading and clearing of a broad array of derivatives contracts and financial securities as well as data and connectivity services related to our exchanges and clearing houses.
- **Fixed Income and Data Services:** we provide fixed income pricing, reference data, indices, analytics and execution services as well as global credit default swaps, or CDS, clearing and multi-asset class data delivery technology.
- **Mortgage Technology:** we provide a technology platform that offers customers comprehensive, digital workflow tools that aim to address inefficiencies and mitigate risks that exist in the U.S. residential mortgage market life cycle, from application through closing, servicing and the secondary market.

Why we do it

Our purpose is to provide data, technology and expertise that inspire innovation and create opportunity.

These core values inform the way we operate:

Collaboration
We work as one team focused on a common set of objectives and committed to each other's success.

Problem solving
We focus on identifying and solving our customers' needs and make well-informed, quick decisions.

Communication
We communicate clearly, constructively and frequently.

Integrity & professionalism
We hold ourselves and each other to the highest standards.

Leadership
We lead by example.

2024 Financial metrics

Net revenues[1]	+16% y/y	Adjusted diluted EPS[2]	+8% y/y	Adjusted free cash flow[2]	+13% y/y
$9.3B		**$6.07**		**$3.6B**	

[1] Net of transaction-based expenses.
[2] Adjusted figures represent non-GAAP measures. Please refer to ICE's 2024 Form 10-K filed on February 6, 2025, and our earnings supplements for reconciliations to the equivalent GAAP measures.

About this report

This report is our 10th annual sustainability report and is supplemented with additional data and narrative context posted on our website and updated throughout the year. This report covers calendar year 2024. We use reporting standards to provide data and benchmarks that can be compared to our sector peers on a like-for-like basis including:

- CDP
- Sustainable Accounting Standards Board (SASB)
- Taskforce on Climate-Related Financial Disclosures (TCFD)

With each reporting standard, we review the data and the standards on an annual basis for necessary updates.

Black Knight acquisition

On September 5, 2023, we acquired Black Knight, a software, data and analytics company that serves the housing finance continuum, including real estate data, mortgage lending and servicing, as well as the secondary markets. We worked throughout 2024 to integrate our sustainability programs and reporting and, unless noted otherwise, this report represents our full consolidated operations, including Black Knight.

Scope

This report includes an overview of how we approach management and oversight of sustainability and an index of key data points and reporting frameworks including TCFD and SASB. The remaining sections center on our areas of focus – the issues that rank highest in our materiality assessment with the most potential for risks and opportunities:

- **Human capital** – our people are our greatest asset and fostering an engaged workforce is as important as ever.
- **Risk management** – from cybersecurity to operational resiliency to regulatory compliance, risk management has been at the heart of how we operate.
- **Environmental risks and opportunities** – we are addressing our impact on the environment, the environment's impact on our business and identifying opportunities to make a broader impact through our products and services.

Additional resources

The following sources contain additional information on a number of sustainability-related topics:

- Sustainability website
- 10-K and Proxy statement
- Privacy & Security Center
- ICE Trust Center
- Code of Conduct and compliance policies
- Modern Slavery Act statement

Approach

We continue to manage sustainability through a tiered approach that starts at the top with Board oversight, is guided at a senior level by a cross-company committee and is integrated throughout our operations.

Board of directors

Our Board of Directors sets the tone in providing directional strategy regarding risks and opportunities posed by sustainability so that we may continue to deliver for our stakeholders. The Board's work is reinforced by the Risk Committee of the Board, which also oversees the company's response to environmental-related risk management, and the Nominating and Corporate Governance Committee of the Board, which is charged with assessing the company's sustainability initiatives and making strategic recommendations on sustainability. Additionally, the Compensation Committee of the Board is responsible for overseeing human and capital management, which is a critical component of sustainability.

Management

Our strategy is guided by a Sustainability Governance Committee. This committee was established in 2019, meets quarterly and communicates frequently to assess sustainability risks and opportunities across the company. It is comprised of senior officials including the:

- President
- Chief Financial Officer
- Chief Operating Officer
- Corporate Risk Officer
- General Counsel
- Human Resources Officer
- Chief Regulatory Officer
- President, New York Stock Exchange
- President, Fixed Income & Data Services
- President, Mortgage Technology
- Senior Vice President, Futures Exchanges
- Vice President, Corporate Affairs & Sustainability

Several departments play a critical role in our approach to sustainability, including the human resources, facilities, risk management, operations, finance and business continuity teams. We think it's critical for the long-term success of our sustainability efforts that the work be fully operationalized and led by those with subject matter expertise in any given area. Our Vice President of Corporate Affairs & Sustainability coordinates these efforts and oversees our disclosures and strategy.

Stakeholder engagement

We believe that the success of our business relies on our ability to deliver on our purpose as a company for our stakeholders: good shareholder returns depend on engaged employees and satisfied customers.

Materiality analysis

To ensure we fully understand the views of our stakeholders we gather feedback through multiple channels, including formally through a materiality assessment every few years. Following our acquisition of Black Knight in September of 2023, we conducted a formal refresh of our sustainability materiality analysis in 2024.
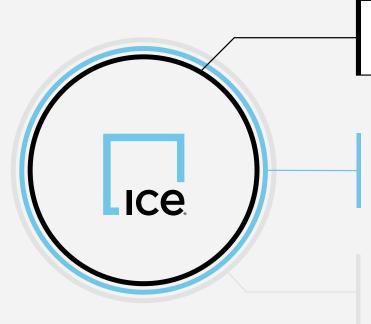
- We worked with a third-party consultant to gather and analyze feedback from our board, employees, customers, investors and suppliers.
- We reached out to internal and external stakeholders from across our business to identify what they view as the sustainability topics that present the greatest risks and opportunities to our business. Outreach took place through a combination of interviews, surveys and desktop research.
- We identified 18 sustainability topics for our assessment, drawing from a number of references including: sustainability ratings, reporting frameworks and desktop research of peers and industry trends.
- The results were overwhelmingly consistent with our previous findings with some minor changes in prioritization. We introduced one new topic in this assessment, the responsible use of AI; the remaining topics considered were consistent with our past assessments, with minor clarifications to the definitions to reflect the evolution of these topics over the past few years.
- We plan to periodically update this assessment to support our continued focus on the matters that are most important for our business and stakeholders.

Approach (cont.)

As noted earlier in this report, based on the results of the assessment, the topics determined to be in Tier 1 essentially form the table of contents for our sustainability reporting and are where we focus most of our attention.

Areas of focus		
Our employees	**Risk management**	**Environmental risks & opportunities**
Delivering solutions and results for our customers and stockholders relies on an engaged and productive team. Retaining and attracting the best talent is what enables us to do that.	We take seriously the trust our customers have in our platforms and technology and the responsibility to protect their data.	We are positioned to be a leader in the transition to a reimagined energy economy. We respond to changing consumer and institutional preferences around energy consumption and associated trends in the market, and offer risk management and hedging tools.
■ Human capital management ■ Employee engagement	■ Risk management & business continuity ■ Business ethics, compliance & conflicts of interest ■ Cybersecurity & data privacy	■ Environmental risks & opportunities

Areas of focus

Human capital management
Our people are our greatest asset and fostering a diverse, engaged workforce is more important than ever

Risk management
From cybersecurity to operational resiliency to regulatory compliance, risk management has been at the heart of how we operate

Environmental risks & opportunities
We are addressing our impact on the environment, the environment's impact on our business and our opportunities to make a broader impact through our products and services

Human capital management

Highly capable and engaged teams are critically important to our ability to grow and innovate. Through our human capital management efforts, we strive to attract and retain the best talent in the world. Our industry is competitive, and expectations are high.

Employee population

As of December 31, 2024, we had a total of 12,920 employees across more than 60 offices in 21 countries. Additional demographic data can be found in the Employee Data section of this report.

Given our M&A activity, we sometimes see significant increases and decreases in our headcount year to year related to acquisitions and divestitures. For instance, following the acquisition of Black Knight in September of 2023, we saw an increase in headcount of approximately 4,000 employees.

As it relates to onboarding employees from M&A activity, our methodologies are similar to our new hire onboarding methodologies in that they address the wide spectrum of important topics ranging from learning about our business, familiarization with our culture, understanding our policies and making meaningful connections. We have tailored strategies designed to help onboard employees of acquired companies of different sizes – whether it's hundreds of employees across multiple geographies or a small team of fewer than 20 people in one office.

Voluntary attrition

We look to voluntary attrition as a key metric for workforce retention and have been disclosing it in this report for the past several years.

After a drop in 2020, we saw steep increases in 2021 and 2022. We believe both were related in large part to the COVID pandemic and the subsequent trend in the labor market of people leaving their jobs in greater numbers across companies and sectors. In 2023 and 2024 we saw a return to our pre-COVID turnover rates, which continue to be better than comparable data in the finance and technology sectors we use as benchmarks.

Year	Attrition
2024	8.4%
2023	8.1%
2022	14.2%
2021	10.5%
2020	5.5%

Note: 2024 includes all full-time employees across our global locations, excluding Black Knight, which will be included starting in 2025 in conjunction with the integration of our HR systems.

Culture and values

Our efforts to shape and influence the culture across ICE are driven by a set of core values. These values have been a fundamental part of how we operate going back to the early days of our company and have served us well through periods of significant growth and geographic and business diversification. They are revisited on a regular basis by our executive management team and refreshed as needed.

Importantly, these values are embedded into how we operate. They form the framework for our:

- **Employee survey** – for each core value there is a set of questions designed to assess whether the day-to-day employee experience meets the expectations of that value.

- **Code of Conduct** – our Code of Conduct outlines the principles by which we operate on a global basis. Each section of the Code is framed around one of our core values. All employees and contractors are required to take extensive training regarding the Code upon hire, and again on an annual basis, as well as attest each year that they have read the Code.

- **Annual performance and compensation review process** – every employee is assessed and rated based in part on performance against our core values. These ratings directly factor into compensation considerations and promotions.

- **Learning and development programs** – every program has been developed with the ICE core values in mind; specifically, the people-manager trainings are heavily focused on exhibiting and encouraging adoption of these core values.

Working from the office

Over the past few years, we have approached the idea of remote work with the goal of carefully balancing the needs of our employees and the operations of our company, which plays a critical role in the global economy. We implemented different work arrangements following the pandemic – first allowing large numbers of people to work remotely, then evolving our approach to require the majority of employees to work from an ICE office five days a week with flexibility granted as needed.

These contrasting setups gave us valuable insights into how work-from-office policies impact critical company aspects like employee engagement, productivity, decision-making, onboarding and collaboration. The benefits of having people work in person are clear, and as a result, our conviction on the value of in-person work has only grown stronger.

Working side-by-side positively impacts our productivity, shortens our decision-making process and increases the quality of our work. It helps us learn from each other, solve problems collectively, build crucial relationships and onboard and mentor new employees more effectively.

Employee survey

We conduct a companywide employee survey every two years. Additionally, we conduct a mix of surveys on an ongoing basis including new hire surveys, stay surveys, exit surveys as well as surveys on ad hoc issues.

Our most recent companywide survey was conducted in June of 2024. The results were aggregated to protect the identity of individual employees and shared with senior leaders based on reporting lines and subject matter. Aggregated results were also shared with all employees. As part of our rollout process, people managers are encouraged to use the results to start a dialogue with their teams and continue soliciting feedback and ideas.

Following each survey, after analyzing results, particularly areas where we scored the lowest, a set of action items are agreed to by the senior management team and assigned accordingly for implementation. These actions often entail new policies, programs, headcount or technology resources. Having two years between surveys allows us to implement actions and better calibrate responses.

2024 results

Our 2024 results ticked up compared to our 2022 survey across categories and we saw double-digit increases[1] in several areas we had targeted for improvement including communication, career development and manager relations related questions, such as:

- **+18%** – In the last seven days, I have received direct and actionable feedback on my work

- **+12%** – I have access to current information on company business and strategy

- **+12%** – ICE's employee development programs – such as on the job training and online courses, workshops or company-hosted webinars made available on our intranet – provide the learning and development resources needed to grow in my role or career
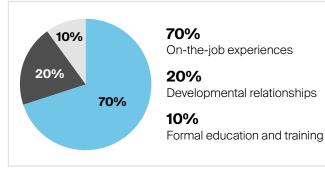
Overall, our scores increased year-to-year from 79% to 83% percent favorable. On the Net Promoter Score (NPS) style question, "Overall, I would recommend ICE to a friend as a good place to work," we remained flat year-to-year at 81% percent favorable. We had 77% participation in 2024, one percentage point down from two years ago, when participation was 78%.

[1] Increase in percent favorable score year over year.

Career development

Over the past several years we have invested in a learning and development program that enables our employees to succeed in their current roles and develop further in their careers. This program is important to stay competitive in our industry and fosters a level of engagement that leads to positive employee retention and attraction. Each year we refine our offering and look for new ways to reach more people with meaningful learning opportunities. We believe in the 70/20/10 model that finds on-the-job experiences account for the bulk of what we learn in the workplace, and we work hard to make sure our formal training is accretive.

As noted in our 2022 Sustainability Report, it is critical that we concurrently build strong internal awareness around the available learning and development resources – these resources are only valuable if the people that need them know where to find them. For this reason, a major focus for us in 2023 was raising awareness around our programs through various internal communications channels and engaging managers to help their team carve out the time for training and to discuss how the learning can be applied. The double-digit score improvement related to learning and development noted in the 2024 employee survey section above is in part due to these awareness efforts.

70%
On-the-job experiences

20%
Developmental relationships

10%
Formal education and training

Strategy

Our learning and development programs are designed based on feedback from our employee survey and business needs. We track the effectiveness of each program through surveys and additional feedback channels that solicit the views of both the participants and the managers of the participants. We are evolving our programs in response to that input as well as the development of new best practices. Training is delivered in a variety of ways to meet the needs of our employees, ranging from required, to opt-in, and on-demand.

Reach

Employees at all levels at ICE have access to career development resources through on-demand online courses, as well as programs designed for various levels led by both in-house and third-party vendor instructors covering a range of topics.

Programs

From a content perspective, our programs generally fall into three categories, resources to:

- Develop people, communication and leadership skills
- Learn more about ICE and our businesses
- Expand technical skills for operations and technology roles

Additional details on these programs are available on our website.

Metrics

We endeavor to measure as much as possible and estimate training per full-time employee in 2024 to average approximately 11 hours per employee.

Year	Percentage of employees receiving training	Average annual training hours per employee
2024	100%	11
2023	100%	12

Note: The 2024 figure includes all full-time employees across our global locations, including Black Knight. The 2023 figure does not include Black Knight.

Our learning and development mission: support the company and our customers by enabling employees to succeed in their current roles and develop in their careers.

Employee benefits and wellness

We are committed to providing a comprehensive and competitive benefits package in each market we operate to ensure our employees' health, wellbeing and financial security.

Benefits

Our employees receive a competitive total rewards package in line with local benchmarks in each of our global locations. We offer market-competitive pay and a wide range of benefits to support our employees' health, wellness, retirement and work/life balance, including competitive leave and time-off plans based on local markets.

Compensation

Compensation is tied to individual results, company results and based on the core values that underpin the culture we aim to foster. Our approach to compensation is discussed at length in our annual proxy filings and includes a variable pay component for the vast majority of employees.

Performance reviews

Our formal performance review process includes self- and manager-assessments as well as the option to conduct 360-degree reviews. In addition to the formal annual process, we practice "always on" feedback channels throughout our reporting chain that encourage people managers to constantly invite and give input.

All newly hired and promoted people managers are required to complete training to help equip them with the skills needed to provide clear and effective feedback and additional training is required as they proceed into higher ranks managing larger teams. Point-in-time reminders and tips are provided for managers to reinforce the training they receive throughout the year.

Wellness

We offer health and welfare benefits, such as medical, dental, vision, life and disability insurance, that are competitive and relevant in the regions where we operate. All employees are eligible for paid time off, including parental leave, in line with industry and local norms.

Under our U.S. benefits program all employees have access to the same healthcare and parental leave benefits regardless of marital status, gender identity or sexual orientation. Accommodation is available including:

- Wellness rooms that can be used by nursing mothers
- Reserved parking for pregnant employees at offices where we own parking lots
- Flexibility to work remotely when needed
- Subsidized emergency backup day care arrangements in the U.S.
- Tax advantaged savings accounts for dependent care arrangements in the U.S.

Through Employee Assistance Programs in most of our locations we provide free and discounted counseling services for dealing with stress, traumatic life events or mental health issues as well as general wellness programs.

We offer top-tier retirement savings programs, which include employer match programs and an Employee Stock Purchase Plan available in nearly all our locations.

Safety

Employees receive annual training on workplace violence and business continuity practices. Throughout our offices we have trained volunteers to assist in the event of an emergency evacuation, and in some cases, to provide medical attention such as CPR. At our New York Stock Exchange building, we have a robust safety program, including in-house security and fire wardens.

Charity

Employee match

We think it's important to support the communities where we live and work, and we think our employees are best suited to know where those needs are. We match charitable contributions for employees up to $5,000 annually.
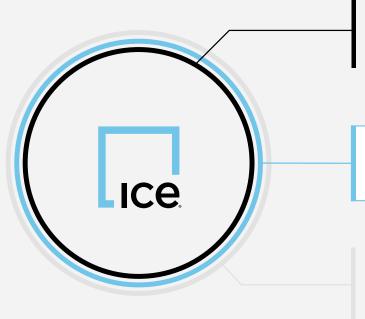
Volunteering

Volunteer activities vary by office and include a broad range of activities such as community rehabilitation, meal-packing and tree-planting.

Financial education

Financial education is the cornerstone of our corporate charitable efforts. We have a vested interest in helping create a more inclusive financial system, educating the next generation of investors and entrepreneurs and empowering people to take control of their financial well-being. More information on the programs we support is available on our website.

Community

In addition to the giving mentioned above, we donate to several community-centered causes throughout the year.

Human capital management
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Risk management
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Environmental risks & opportunities
We are addressing our impact on the environment, the environment's impact on our business and our opportunities to make a broader impact through our products and services

Risk management

We take seriously the trust our customers have in our platforms and technology and the responsibility to protect their data. Our risk management programs are designed to provide for the security and safety of our operations, safeguard our people and our facilities and mitigate business disruptions.

Our Board of Directors is responsible for overseeing ICE's risk management process, which includes management of general operational risks, as well as risks facing our various businesses. With the assistance of our Audit and Risk Committees and our Subsidiary Boards, the Board oversees that our assets are properly safeguarded, that appropriate financial and other controls are maintained, and that our business is conducted prudently and in compliance with applicable laws, regulations and our corporate policies.

Enterprise risk management

We have an enterprise risk management team, led by the Corporate Risk Officer. The team includes regional Chief Risk Officers that provide risk management services to our business segments: Exchanges, Fixed Income and Data Services and Mortgage Technology.

ICE has adopted the Institute of Internal Auditor's Three Lines Model for managing risks. The model helps identify structures and processes that assist in the achievement of corporate objectives while supporting strong governance and risk management practices. The model also helps us identify the responsibilities of key players to achieve effective strategic alignment and accountability by outlining the roles of leadership within the organization, including oversight by the board and governing bodies; management and operational leaders including risk and compliance (first- and second-line roles); and independent assurance through internal audit (third-line) and external providers.

Sustainability risks are fully integrated into our broader risk management program and overseen by the enterprise risk management team.

Technology and operational resilience

ICE maintains a robust technology infrastructure and business continuity strategy designed to ensure the reliability and security of our critical market operations.

Operational resilience framework

Our comprehensive approach to operational resilience encompasses:

- Structured incident management processes
- Fault-tolerant and concurrently maintainable infrastructure designs
- Regular validation of operational readiness
- Board-level technology governance oversight

Infrastructure and technology

We implement redundancy strategies across:

- Critical operational systems
- Network and technological infrastructure
- Data management, data protection and recovery platforms

Organizational preparedness

Our resilience strategy is supported by:

- Mandatory enterprise-wide business continuity training
- Proven incident response capabilities
- Mature disaster recovery and business continuity processes

By maintaining a dynamic and comprehensive approach to operational continuity, we mitigate potential disruptions and preserve the integrity of our critical services.

Cybersecurity

Our Information Security Department consists of diverse and skilled teams that work to protect the confidentiality, availability and integrity of data and systems from unauthorized access, misuse, disclosure, destruction, modification or disruption.

Our business activities rely extensively on technology and software, including the systems used by our business partners, regulators and customers. In addition, our activities involve the use and retention of confidential data and information. These activities make us susceptible to cyberattacks.

We employ the following activities, processes and strategies to help evaluate, manage and address these risks.

Strategy

We maintain a Cybersecurity Strategy, or CSS, which emphasizes consideration of the nature of our business, ongoing intelligence collection regarding cybersecurity threats, and initiatives to specifically address prominent areas of cybersecurity risk. The CSS outlines the key priorities for our cybersecurity program and the methods by which our Information Security department seeks to accomplish those goals.

Governance and leadership

Our Board of Directors is responsible for overseeing ICE's risk management process, which includes management of general risks as well as specific risks, such as those relating to cybersecurity, facing our business.

The Risk Committee of our Board of Directors has been delegated the primary responsibility for overseeing management's identification and mitigation of cybersecurity risk. The Risk Committee is composed of board members with diverse expertise including cybersecurity, risk management, technology, business operations, regulatory and finance. The Risk Committee receives presentations on at least a quarterly basis from our Chief Information Security Officer, or CISO, and senior members of the enterprise risk management team and the Chair of the Risk Committee provides reports to the full Board of Directors following such presentations.

Our Information Security department is led by our CISO, who, in addition to quarterly presentations to the Risk Committee of our Board of Directors, also provides comprehensive reports to a dedicated internal governance committee at least quarterly outlining threat assessment, control performance, and ongoing enhancements. Our current CISO has served in the role since September 2021 and leads the cybersecurity program across our regulated futures and options exchanges, clearing houses, trade repositories, equities venues, systemically important financial market utilities and our data services network and mortgage technology platforms. Prior to joining ICE, our CISO served as CISO of the White House Military Office and as CISO for two technology companies, and has more than 20 years of experience in cybersecurity, national security, and intelligence.

Additionally, cybersecurity matters are reported to and discussed with a cross-subsidiary leadership committee and subsidiary boards. The Cyber Threat Intelligence team monitors multiple cybersecurity intelligence feeds and curates the applicable data. In the event we identify a cybersecurity threat applicable to us, we have a process to evaluate, escalate to senior management and respond to the threat faced. In addition, our CISO and other senior security leaders conduct periodic cybersecurity education sessions with our employees and directors. These sessions cover general cybersecurity topics as well as specific details regarding our cybersecurity program.

Risk management

Cybersecurity risk management is integrated into our broader enterprise risk management framework. Our cybersecurity leadership team, in concert with our enterprise risk management team, assess threats and risks at least annually through the Enterprise Technology Risk Assessment process, which includes threat objective inherent risk score determination, identification of key and supporting controls, and resulting residual threat objective risk scores.

Additionally, thematic threats such as sabotage, fraud, and theft of assets or customer data are used to frame our risk management activities. Asset theft often involves organized crime or financially motivated nations staging sophisticated, well-planned campaigns to steal significant cash, cryptocurrency, or equivalent assets. Our thematic threats, along with others, are evaluated by our Board of Directors as well as our Risk Committee, Corporate Risk Officer and our CISO.

The CSS provides the framework we use for assessing risk, prioritizing testing, identifying remedial actions and validating improvements. The CSS also provides for the deployment of external and internal teams of ethical hackers that operate alongside our traditional vulnerability detection processes.

Information sharing

We recognize the importance of collaboration and information sharing among private sector firms in the financial services sector, across sectors, and with global public-sector agencies, when appropriate. Our cybersecurity leaders hold memberships and/or positions within the Financial Services Information Sharing and Analysis Center, or FS-ISAC, and the cross-sector Analysis and Resiliency Center, or ARC, in the U.S., the Financial Sector Cyber Collaboration Centre, or FSCCC, in the U.K., and similar organizations across the Europe, Middle East and Africa, or EMEA, and Asia Pacific, or APAC, regions.

Third-party risk oversight

We maintain a third-party risk management program. Our Information Security team provides subject matter expertise to our vendor management team to help assess a vendors' cybersecurity processes. Vendors are assessed before we engage them, and once engaged, are monitored periodically to ensure that they maintain compliance with our cybersecurity standards.

Independent security attestation

We utilize both internal assessments and assessments by third parties, including external security assessors, consultants and auditors, to evaluate and test our cybersecurity program.

ICE's internal audit, enterprise risk management, and information security assurance teams conduct frequent assessments of varying scope to validate that our cybersecurity program controls and remediation processes are operating effectively.

External auditors are contracted to perform annual Service Organization Controls, or SOC, report attestations of both business and security controls.

In addition, our Cybersecurity Incident Response Plan is tested at least annually.

Our internal "red team" conducts multiple tests each year driven by key cybersecurity risks. The results of these reviews alongside frequent regulatory and customer examinations are assessed, with any resulting mitigation activity assigned and tracked to remediation.

Controls

Our identification of risks and selection of cyber-related controls is performed in the context of the critical financial infrastructure we maintain and operate. Our ongoing threat assessments are intended to identify changes in external events and in our activities, infrastructure and processes that could necessitate reprioritization of risks and controls. The nature of our business activities mandates an emphasis on sabotage and asset theft as primary threats in addition to contemporary themes of data theft. Our focus on these threats leads to an emphasis on network security, social engineering controls, behavioral detection of insider threat, and deliberate and rehearsed recovery strategies.

Although we do not believe that our business strategy, results of operations or financial condition have been materially adversely affected by any cybersecurity threats, we have been, and expect to continue to be, subject to cyberattacks, hacking and other cybersecurity risks.

For further information on our cybersecurity risks, see Part I, Item 1(A), "Risk Factors", including the risk factor entitled "Our systems and those of our third-party service providers are vulnerable to cyberattacks, hacking and other cybersecurity risks, which could result in wrongful manipulation, disclosure, destruction, or use of our information or that of a third party, or which could make our customers unable or reluctant to use our electronic platforms," included in our Annual Report Form 10-K.

Ethics and compliance

Our Board and management team set the tone for our culture and hold all employees, contractors and consultants accountable for operating ethically and in compliance with labor laws, financial regulations and other standards that apply to our businesses. We provide relevant tools, resources and training to help employees succeed and to recognize ethical decision-making. Our compliance team is led by the Vice President for Compliance, who reports to the General Counsel.

Policies

Our compliance policies are approved by the board's Nominating and Corporate Governance Committee and reviewed regularly and assessed for effectiveness. All employees (full- and part-time) globally, as well as contractors, are trained, tested and must attest that they have read and understand the appropriate policies annually. Test scores are assessed to ensure understanding. Any breach of our policies is investigated, and, when necessary, appropriate actions are taken, which may include termination of employment. Our ethics and compliance policies include:

- Anti-Bribery Policy
- Anti-Money Laundering, Anti-Tax Evasion and Sanctions Policy
- Business Gifts, Meals and Entertainment Policy
- Code of Business Conduct
- Personal Trading Policy
- Reporting and Anti-Fraud Policy

Code of Conduct

Our Code of Business Conduct reflects the rules and principles by which we operate on a global basis. It is not a comprehensive manual that covers every possible situation – no document could be. It is a guide that serves as a reference and a reminder. At ICE, we do the right thing not because it is written in a code but because it is part of our ethos and the commitment we make to our customers who trust us with their investing and risk management needs.

The Code is framed around ICE's core values: collaboration, problem solving, communication, integrity & professionalism and leadership.

It encourages employees to come forward with questions, concerns and reports of actual or suspected misconduct with the confidence that ICE's commitment to non-retaliation is firm. We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate action.

The Code covers topics including:

- Conflicts of interest
- Corruption and bribery
- Fair competition
- Health and safety
- Human rights
- Privacy and data protection
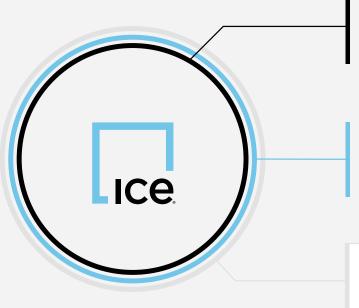- Recordkeeping

Gifts, meals and entertainment

Procedures are in place requiring that gifts, meals and entertainment given to or received from a business partner above certain thresholds be reported to and approved by the compliance department. Additionally, gifts, meals and entertainment given to or received from a government official must be reported at any level not considered de minimis.

Anti-fraud

As part of our Global Reporting and Anti-Fraud Policy, we have a Protected Disclosure Hotline (formerly known as the Whistleblower Hotline) that can be accessed easily through both external and internal resources.

- We use EthicsPoint as our third-party service provider: ethicspoint.com / (866) 294-4493
- Inquiries can be made anonymously subject to the laws of the country in which the employee is based.
- Every inquiry is reported to the chair of the Audit Committee at the same time it is reported to management.
- Every inquiry is fully investigated, reported to the Audit Committee and actions are taken as appropriate.

Human capital management

Our people are our greatest asset and fostering a diverse, engaged workforce is more important than ever

Risk management

From cybersecurity to operational resiliency to regulatory compliance, risk management has been at the heart of how we operate

Environmental risks & opportunities

We are addressing our impact on the environment, the environment's impact on our business and our opportunities to make a broader impact through our products and services

Environmental risks and opportunities:
Task Force on Climate-Related Financial Disclosures

We approach our risks and opportunities regarding the environment in three ways:

- Our opportunity to make a broader impact through sustainable finance products and markets
- The impact of the environment on our business
- How we address the impact of our operations on the environment

Governance

In addition to the strategic direction and oversight provided by the Board and Committees of the Board and the Sustainability Governance Committee outlined in the Approach section of this report, the company's global enterprise risk management team, overseen by the Risk Committee and led by our Corporate Risk Officer, has developed an approach based on the Task Force on Climate-Related Financial Disclosures (TCFD) framework to assess the range of impacts from environmental-related risks to our businesses.

We have also included a discussion regarding environmental risk as a unique and distinct risk factor in ICE's 10-K Risk Disclosure. We will continue to advance the principles of transparent governance and other best practices as we evolve our thinking around environmental risk. The pertinent extract from our 10-K is included in Appendix I for reference.

Additionally, we publish reports on an annual basis that are conducted using the GHG Protocol Corporate Accounting and Reporting Standard, the Task Force on Climate-Related Financial Disclosures recommendations and through reporting portals such as CDP.

Strategy

Environmental-related risks and opportunities

Risks

Environmental-related risks that are most pertinent to ICE fall broadly into two categories:

- Transitional – which centers around evolving impacts to demand for different products as the economy transitions toward cleaner energy sources; and
- Physical – which focuses on potential impacts to ICE's operations or to our stakeholders resulting from acute weather events.

Examples of relevant strategic risks are outlined below. Each component referenced details specific risk-based factors we have considered and implemented within our overall strategy.

Transition risk

Market risk

Risks presented to ICE as the markets it serves and products it offers evolve. As the focus on cleaner energy resources grows, demand for certain products may also wane — and the price discovery process for such products could become more challenging. This risk category underscores the important role that ICE's transparent, liquid, and diverse marketplaces play in support of our customers' energy and risk management needs and in facilitating the transition to cleaner fuel sources.

Policy or regulatory risk

Risks could be presented to ICE and its stakeholders by changes to policy or regulation that may impact participation in our products or markets. ICE maintains robust governance, regulatory and compliance protocols to continue to adapt to evolving policy.

Reputational risk

Stakeholder concerns and shifts in consumer preferences over time could present reputational risks for a variety of companies across the globe. These factors might also relate closely to market risk if consumer sentiment or demand for certain products traded on ICE's markets were to change. ICE has always prioritized the facilitation of transparent and open markets, supplemented by our data solutions, to help our stakeholders manage their risk.

Physical risk

Operational risk

Risks related to the resilience of our operations include facilities-based risk associated with a one-off weather event. Our business continuity teams have implemented an "All Hazards" approach to address wide-ranging potential threats or disruptions to our operations.

Ecosystem risk

Increasingly severe and persistent weather events may place strain upon the global market ecosystem. We recognize the importance of our business and our vendors remaining available to serve our customers throughout such potential future events. Our procurement, third party risk management and business continuity teams work together to strengthen ICE's ability to service our markets and products despite the risk of future uncertainty.

In developing our environmental-based risk approach, we also considered the timelines on which various risks may manifest themselves differently across our categorization structure. In line with best practices, we further delineated our strategies to encompass short- (one year or less), medium- (one to five years) and long-term (five years or longer) time horizons.

Opportunities

ICE is uniquely positioned to be a leader in the transition to a reimagined energy economy. We do that by responding to changing consumer and institutional preferences around energy consumption and associated trends in the market, and by offering risk management and hedging tools. Our stakeholders are increasingly incorporating sophisticated datasets into their risk management strategies, and we continue to build wide-ranging proprietary data solutions to offer unique market insights. Our technology and data expertise position us to deliver solutions that meet these evolving customer needs.

The opportunity to make a broader impact through our products extends across our business and includes environmental markets and data that support NYSE-listed companies in their sustainability reporting efforts:

Environmental markets – environmental risk mitigation is influencing the energy landscape and requires a price signal for the conservation and cultivation of nature. The energy transition is a long-term phenomenon, underpinned by a market-based economy that can deliver cost-effective, scalable solutions. ICE has been a leader in environmental markets for nearly two decades. More information

Environmental risk data – wildfires, flooding, and increased insurance costs are driving integration of physical risk and transition risk into the assessment of portfolios and assets. Environmental risks such as extreme weather events can impact the value of portfolios, while also serving as an additional input into identifying investment opportunities. ICE provides data and analytics that can help investors to quantify the impacts their portfolios and investments face from transition risks as well as physical risks posed by extreme weather events. ICE offers an array of metrics across several fixed income asset classes, including corporates, munis, sovereigns, MBS and more. More information

NYSE – a company's management of sustainability is often seen as integral to its long-term success. The NYSE provides resources and platforms for dialogue between issuers and investors to help create more sustainable companies that deliver long-term benefits for all stakeholders. More information

Impact of risks and opportunities on business, strategy and financial planning

ICE has a strong track-record of remaining nimble and proactive relative to evolving market trends. ICE's strong benchmark coverage across energy markets anchors liquidity to our exchanges and provides broad-based product coverage in anticipation of an assumed increase in energy demand in the coming years.

We also anticipate a non-linear relationship between end-use consumption of energy and trading volumes. Therefore, potential reductions in usage of certain fossil fuels are unlikely to result in a corresponding decrease in trading volumes of those fossil fuels. Conversely, market participants may need to rely on energy markets even more heavily to facilitate risk management practices and price discovery principles. Additionally, energy growth rates and potential rates of diminishment will vary by geographic region. ICE anticipates that aggregate demand for a variety of energy sources in Asia will grow, while in other regions demand could stay consistent.

Supply shortages and price volatility in certain commodities and energy markets may be a harbinger of challenges presented by a large-scale energy transition. The latest data show that the world's appetite for energy rose at a faster-than-average pace in 2024, resulting in higher demand for all energy sources, including oil, natural gas, coal, renewables and nuclear power. This growth was led by the power sector, with demand for electricity rising almost twice as fast as wider energy demand due to higher demand for cooling, rising consumption by industry, the electrification of transport and the growth of data centers and artificial intelligence. Nearly all of the rise in electricity demand was met by low-emissions sources, led by the record-breaking expansion of solar PV capacity, with further growth in other renewables and nuclear power. Gas demand also picked up substantially, while oil and coal consumption increased more slowly than in 2023.[1] The shifting merit order alongside imbalances in supply and demand could introduce additional complexity and volatility to energy markets, driving greater demand for our risk management solutions.

ICE has a strong record of innovating in the energy markets and is set up to continue to innovate in trading and data as the market evolves. Our strategic investments and innovative approach have already yielded telling results. Cleaner energy sources, which include our global natural gas and environmental markets, account for nearly half of our energy revenues compared to one-third a decade ago.

Still, the shift to these energy sources remains a complex, long-term dynamic. ICE's global environmental markets, alongside global oil, gas, and power markets provide a critical price transparency tool across the energy spectrum that will enable participants to navigate this evolution.

Resiliency, taking into consideration scenario analysis

ICE has a well-established track record in operational resilience, and we invest significantly in our technology, security and systems. We anticipate that ICE will be well prepared to respond to physical environmental risks through our mature and regularly tested business continuity and disaster recovery programs, and regular coordination between our systems, operations, and technology teams, with input and challenge from risk management and senior leadership.

Scenario selection

We consider extreme but plausible scenarios as part of our approach to environmental risk management, including the incorporation of more frequent and higher impact weather related events that may impact our stakeholders and challenge broader economic factors.

To test the resiliency of our strategy we considered a range of benchmark scenarios and selected the International Energy Agency (IEA) Net Zero Emissions by 2050 Scenario (NZE).[2] NZE outlines the economic changes necessary for the global energy sector to achieve net zero CO2 emissions by 2050. We thought it practical to select a benchmark scenario rooted in the recasting of global energy demands in light of ICE's role in providing international benchmark energy contracts such as Brent Crude Futures and Options, and the increasing prominence of contracts such as Dutch Title Transfer Facilities (TTF) Gas Futures – the emerging global gas benchmark.

The NZE scenario limits the global temperature rise to 1.5 Celsius and makes many assumptions regarding opportunities to decarbonize as well as the ability for significant supranational coordination, which presents its own uncertainties.

Risk management

Process for identifying and assessing environmental risks

ICE has adopted the Institute of Internal Auditor's Three Lines Model for managing risks. The model helps identify structures and processes that assist in the achievement of corporate objectives while supporting strong governance and risk management practices. The model also helps us identify the responsibilities of key players to achieve effective strategic alignment and accountability by outlining the roles of leadership within the organization, including oversight by the board and governing bodies; management and operational leaders including risk and compliance (first- and second-line roles); and independent assurance through internal audit (third-line) and external providers.

Enterprise Risk Management personnel regularly engage and collaborate with a comprehensive cross-section of management that oversees wide-ranging aspects of the company, including sustainability, business operations, business continuity, customer relations, product, and disaster recovery. Points of emphasis include potential environmental risks as well as opportunities and risks presented by changing consumer habits and marketplace preferences, in alignment with the TCFD.

As a leading data and technology company, ICE has a network of broad and diverse stakeholders. Communication with these stakeholders, including our NYSE-listed issuer community, participants in our futures markets and clearing houses, consumers of our data and mortgage technology have also informed our environmental risk assessments.

Analysis from our risk assessments is shared with the Sustainability Governance Committee, as well as risk committees and our boards, to provide a holistic risk management approach and to evaluate enterprise-wide risks and opportunities related to environmental risk.

We have translated the risk classifications provided under the TCFD framework into a Taxonomy to enable a common language across ICE to evaluate environmental risks.

Process for managing environmental risks

Risks are evaluated using risk ratings guidance, as defined by the enterprise risk management policy, which assesses both the likelihood of these risks (across multiple time horizons) and their potential impacts. Risks are assessed both on an Inherent basis (meaning in the absence of any mitigations or controls) and on a Residual basis (taking into consideration any mitigations or controls). Each risk is assigned an overall score of very low, low, medium, high, or critical, and is assigned a risk owner with whom enterprise risk management will work to ensure that risks are appropriately mitigated and managed in accordance with risk scores.

Integration of environmental risks

Environmental risks are embedded into our overall risk management program, which has broad visibility and input from across our organization. Risks are regularly evaluated on a companywide basis. The frequency and methods by which risks are assessed are informed by a comprehensive strategy that factors in the nature of the risk, the risk score assigned to the risk should it be realized, the strength of the controls associated with the risk's profile, and the potential implications of the risk. Additionally, each business that we operate evaluates environmental-focused risks most pertinent to its own strategy and operations to continue to safeguard ICE's position as an all-weather company.

[1] International Energy Agency, Global Energy Review 2025, Global Energy Review 2025 – Analysis - IEA, March 2025
[2] International Energy Agency, Net Zero Emissions by 2050 Scenario (NZE), Net Zero Emissions by 2050 Scenario (NZE) – Global Energy and Climate Model – Analysis - IEA, May 2021

Metrics and targets

We use an evolving mix of metrics to assess and manage environmental-related risks and opportunities for our business.

Metrics

Transitional risks

ICE uses a range of metrics bespoke to each of the risks it has identified in assessing:

- How market changes are evolving the risk management demand for our products; and
- Where regulatory changes may present new risks and opportunities.

Physical risks

We look at a range of metrics to assess environmental-related risks including energy consumption, waste management, business travel, our supply chain and our investments.

Physical risk: ICE Geo-Analyzer

To further inform our strategic response, the enterprise risk management team leverages ICE's own Geo-Analyzer visualization and analytics solution to risk-rate ICE's key physical sites and locations across the globe. No ICE locations reside in higher-rated physical risk environments when factoring in various attributes of risk including the potential for hurricanes, floods, and wildfires.[3] ICE is also geographically dispersed, which assists in mitigating risk where we have high employee concentration.

Data centers

Our energy management program focuses on data centers where we can have the most impact. Our data centers use Power Usage Effectiveness (PUE) as a key metric for energy efficiency and have implemented energy-efficient techniques to reduce energy consumption and operating emissions. We have implemented various strategies to improve PUE, including data center air management, high-efficiency chillers, speed control on cooling equipment, installation of solar panels and automated lighting control systems.

Our data centers are built to meet stringent specifications, which have enabled us to obtain ISO 50001 certifications for the Chicago, IL; Mahwah, NJ; and Basildon, U.K. sites.

Greenhouse gas emissions

This is our fifth year calculating and disclosing our greenhouse gas emissions in line with the GHG Protocol Corporate Accounting and Reporting Standard and our fourth year including all relevant categories of Scope 3. The metrics included below and discussed in this report include the operations of Black Knight, an acquisition we completed on September 5, 2023.

Our calculations are performed using the GHG Protocol and with assistance from a third-party firm with expertise in this area. Additionally, Scope 1 and 2 emissions data published in this report have received Limited Assurance from KERAMIDA, an independent Environmental, Health and Safety, and Sustainability consulting firm.

VERIFICATION LETTER

Our calculations are a mix of activity-based and, in the case of several Scope 3 categories, spend-based and hybrid supplier-specific / spend-based methodologies. Additional methodology details are included in our CDP questionnaire.

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[3] ICE evaluated 29 office and data center physical locations identified by management as important corporate sites across the globe. Locations were evaluated by ICE's Geo-Analyzer tool, a proprietary data services solution that seeks to inform a particular location's susceptibility to certain factors, including flood, hurricane, or wildfire. Inputs were aggregated to yield a "Total Climate Risk Score" presented as a numerical digit on a scale ranging from 1-5, in which a 1 represents "Low Risk;" a 2 represents "Moderate Risk;" a 3 represents a "High Risk;" a 4 represents a "Very High Risk;" a 4.5 represents "Extreme Risk;" and a 5 represents the "Most Extreme Risk." All ICE locations analyzed received a Total Risk Score of less than 3.

Greenhouse gas emissions (mtCO$_2$e)

Metrics	Activity	2021	2022	2023	2024
Scope 1	Fuel use (stationary)	1,158	1,015	991	1,089
	Fuel use (mobile)	3,807	4,313	4,310	3,731
	Refrigerants	1,854	243	519	391
Total Scope 1		**6,819**	**5,571**	**5,820**	**5,212**
Scope 2	Electricity	61,446	56,696	67,285	67,857
	Steam	1,555	1,518	1,298	1,537
Total Scope 2 (location-based)		**63,001**	**58,214**	**68,583**	**69,394**
Total Scope 2 (market-based)		**11,924**	**10,934**	**9,445**	**1,537**
Total Scope 1 and 2 (location-based)		**69,820**	**63,785**	**74,403**	**74,606**
Total Scope 1 and 2 (market-based)		**18,743**	**16,505**	**15,265**	**6,749**
Scope 3					
Category 1	Purchased goods & services	146,491	156,871	176,340	124,396
Category 2	Capital goods	34,164	29,214	33,451	59,001
Category 3	Fuel- and energy-related activities	22,213	19,790	14,370	13,226
Category 4	Upstream transportation and distribution	Included in Scope 3 and 1			
Category 5	Waste generated in operations	973	864	906	967
Category 6	Business travel	1,984	7,529	8,653	11,825
Category 7	Employee commuting	2,471	5,204	8,533	11,607
Category 8	Leased assets (upstream)	Included in Scope 3 Category 1			
Category 9	Transportation and distribution	Not relevant			
Category 10	Processing of sold products	Not relevant			
Category 11	Use of sold products	Not relevant			
Category 12	End-of-life treatment of sold products	Not relevant			
Category 13	Leased assets (downstream)	Not relevant			
Category 14	Franchises	Not relevant			
Category 15	Investments	8,220	3,527	3,771	1,515
Total Scope 3		**216,516**	**222,999**	**246,024**	**222,535**
Total Scope 1, 2 and 3 (location-based)		286,336	286,784	320,427	297,141
Total Scope 1, 2 and 3 (market-based)		235,259	239,504	261,289	229,284

Notes:

[1] All emissions are reported in tCO$_2$e.

[2] All figures going back through 2021 are adjusted to account for Black Knight acquisition.

[3] 2023 Scope 2 emissions values were updated to account for revised electricity consumption data received from one of our facilities and Scope 3, Category 3 emissions were updated to include well-to-tank emissions associated with heat and steam consumption.

[4] The decrease in 2024 Scope 2 market-based emissions reflects the purchase of RECs for all electricity consumption, which was not a practice at Black Knight before it was integrated into ICE.

[5] Scope 3 categories 9, 10, 11, 12, 13 and 14 have been deemed not relevant to ICE based on our complete set of business activities.

[6] Scope 3 category 4 emissions have been wholly included in Scope 3 Category 1 emissions. Category 8 emissions have been wholly included in Scope 1 and 2 emissions.

Targets

Scope 1

Our Scope 1 emissions come from combustion and refrigerant emissions tied to the offices and data centers that make up our real estate footprint as well as vehicle-related emissions. Our efforts to reduce these emissions will take place through working with our landlords to advocate for building efficiency, upgrades and, as needed, migrating to more efficient leased spaces over time. Vehicle-related emissions can be mitigated by cleaner fuel sources, which we are monitoring the development of.

In the meantime, we purchase registered and certified carbon credits to match all Scope 1 emissions. Additional details on those purchases are available in our CDP report.

Scope 2

We purchase energy attribute certificates (EACs) for all electricity consumed in our offices and data centers that is not already coming directly from renewable sources. EAC purchases for 2024 totaled 212,420 MWhs and include 202,437 RY2024 Green-e certified renewable energy certificates (RECs) for all electricity consumed in the U.S. The remaining EAC purchases were matched based on the country where the electricity was consumed and compliance year.

We also purchase registered and certified carbon credits to match all Scope 2 steam-based emissions. Additional details on those purchases are available in our CDP report.

We continue to explore additional renewable energy procurement methods as the market for clean energy evolves and we are monitoring changes being considered by the Greenhouse Gas Protocol that may impact the treatment of these methods for GHG accounting purposes.

Scope 3

We are collecting data from our suppliers that will give us a clearer picture of progress they are making to reduce greenhouse gas emissions and allow us to engage and support suppliers who are in the early stages of measuring and managing their decarbonization strategy.

Appendix I:

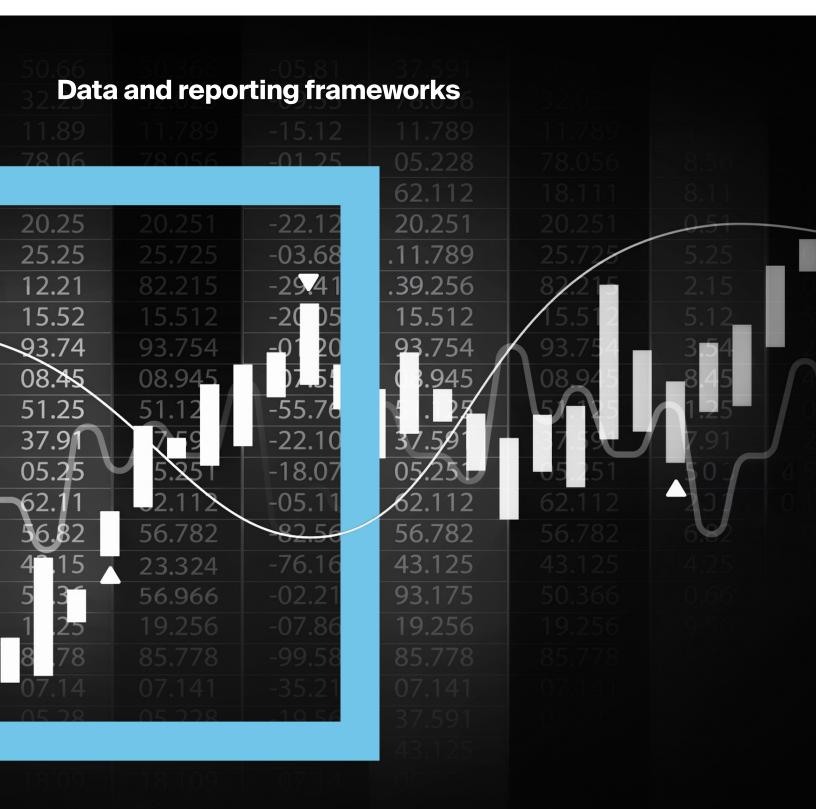# 10-K risk disclosure excerpt

Climate change poses operational, commercial, reputational, regulatory and financial risks.

Climate change may increase the frequency or severity of extreme weather events and other natural disasters, and such events could negatively impact our activities and results of operations and impact the activities of our customers or third-party vendors or suppliers. The physical commodities and assets underlying certain of our markets may also be impacted by climate change, which could impact users of our markets. The risks associated with climate change may evolve rapidly and we expect that climate change-related risks may increase over time.

We face reputational, regulatory and financial risks related to our ability to respond to diverse stakeholder expectations and requirements on sustainability-related topics, including in connection with a transition to clean and renewable energy.

A variety of sustainability-related topics, including the transition to clean and renewable energy, involve rapidly changing and diverging expectations from our stakeholders, including consumers and institutional investors. Our ability to satisfy the preferences of our stakeholders around these topics (including on energy production and consumption) and the possible failure of our products or services to support the needs and meet the expectations of such stakeholders could adversely impact our business and revenues. Changing market demands and preferences could also have an adverse impact on the operations or financial condition of our customers, which could result in reduced revenues from those customers. In addition, the uncertainty related to the transition to clean and renewable energy and away from fossil fuels, including regulatory or legislative changes by the U.S. government with regard to energy policy and related subsidies, incentives or penalties, may negatively impact trading on our markets and have an adverse effect on the activities of our customers or third-party vendors, which could negatively impact our revenues. Furthermore, lawmakers in many jurisdictions have proposed or adopted laws, regulations or policies on sustainability-related topics, including climate change and diversity, equity and inclusion, that diverge from, or potentially conflict with, laws in other jurisdictions in which we operate. In May 2024, the EU adopted the Corporate Sustainability Due Diligence Directive, which will become effective in 2027 and introduce comprehensive due diligence requirements regarding adverse impacts on human rights and the environment in a company's and its business partners' operations as well as the requirement to put into effect a climate transition plan. We are subject to risks related to this and other such laws, regulations or policies, which could impact us and our customers and result in increased regulatory, compliance, reputational or operational challenges and costs.

Data and reporting frameworks

Sustainable Accounting Standards Board metrics

Metrics for 2024 are included for the Security & Commodity Exchanges and Software & IT Services sectors where relevant for our business.

Table 1. Sustainability disclosure topics & accounting metrics

Transparent & efficient capital markets

(1) Number of (a) halts related to public release of information
FN-EX-410a.1

	Number	Duration
Halt	News event trading halts: **NYSE:** 207 **American:** 75 **Arca:** 17	The duration of material news-related trading halts fluctuates on a case-by-case basis and can be anywhere from a few minutes to a few hours or even a few days.
Pause	LULDs (or single-stock circuit breakers): **NYSE:** 601 **Arca:** 58 **American:** 648	LULD halts are 5 minutes long

Percentage of trades generated from automated trading systems
FN-EX-410a.2

We operate securities and futures exchanges. None of the members of our securities exchanges are required to disclose whether orders sent are generated by automated trading systems and thus ICE cannot track this information. In our futures exchanges, the requirement to identify usage of an automated trading system varies by jurisdiction and the percentage of trades generated by any version of an automated trading system varies greatly by asset class and can range greatly in any given product / instrument.

Automated trading in securities and futures markets provides more liquidity, increases capacity for market making, and results in more efficient price discovery through tighter bids and offers. Risks include the potential for operational and technology disruptions, which we mitigate via robust protocols for risk management, disaster recovery / business continuity and market surveillance.

Description of alert policy regarding timing and nature of public release of information
FN-EX-410a.3

The NYSE Timely Alert procedures (1) for listed companies apply between the hours of 7:00 a.m. ET and 4:00 p.m. ET. NYSE-listed companies are required to use any Regulation FD compliant disclosure method (2) to disseminate material news to the public (including foreign private issuers even though not subject to Regulation FD). Companies are required to follow the procedures below:

1. Between the hours of 7:00 a.m. and 4:00 p.m. (3), companies are required to call the NYSE at least 10 minutes in advance of issuing material news or news that might impact trading in the company's securities. Outside of these hours, companies are not required to provide advance notice to the NYSE, but are encouraged to email a courtesy copy of the news if it is material.

2. When providing the 10-minute advance notice, companies should direct their call to the NYSE Market Watch team at 877.699.2578 or 212.656.5414. When calling, it is important that the company's representative be knowledgeable about the details of the news being issued.

3. In advance of issuing the news, the company must submit a copy of the press release or other Regulation FD disclosure to the NYSE. The disclosure can be submitted in one of two ways; (1) upload the document to Listing Manager or (2) email to nysealert@nyse.com. In addition, companies are required to provide a representative's contact information in case questions arise, and if providing via email, to include in the subject line: ticker symbol followed by a hyphen and the headline of the press release (example: XYZ-XYZ Corp. Announced First Quarter Earnings).

4. In order to allow for the orderly closing of a company's stock on the NYSE, companies are prohibited from publishing material news after the official closing time for the NYSE's trading session until the earlier of 4:05 p.m. ET or the publication of the official closing price of the listed company's security (except when publicly disclosing material information following a nonintentional disclosure in order to comply with Regulation FD). The NYSE continues to encourage companies to hold post-market news releases until 4:15 p.m.

Description of policy to encourage or require listed companies to publicly disclose environmental, social, and governance (ESG) information
FN-EX-410a.4

The NYSE provides resources to encourage and help issuers determine the best path to building a sustainability strategy and disclosure for their companies, including reporting guidance, webinars and a library of content. NYSE also runs active educational and networking programs to help listed companies share best practices as well as connect with other leaders in sustainability and governance. NYSE Resource Center.

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(1) The full text of the timely alert policy can be found in Section 202.06 of the NYSE Listed Company Manual for NYSE listed issuers; Section 401 of the NYSE American Company Guide for NYSE American listed issuers; Rule 5.3-E(i)(2) of the NYSE Arca Company Guide for NYSE Arca listed issuers.
(2) The full text of Regulation FD is available at sec.gov/rules/final/33-7881.htm.
(3) NYSE Regulation will only implement news pending trading halts upon a company's request between the hours of 7:00 a.m. ET and 9:30 a.m. ET. Additional details can be found in Section 202.05, 202.06, and 202.07 of the NYSE Listed Company

Managing conflicts of interest

Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations
FN-EX-510a.1

In accordance with applicable securities laws and regulations, ICE includes a description of material legal proceedings (including of the type, if any, described in FN-EX-510a.1) in our annual and quarterly filings on, respectively, Forms 10-K and 10-Q.

Discussion of processes for identifying and assessing conflicts of interest
FN-EX-510a.2

ICE has adopted a Global Code of Business Conduct that applies to its employees, directors, consultants and contractors. The Global Code of Conduct clearly sets out the process by which conflicts of interest are identified, reported and managed. ICE conducts annual training for its employees on its Global Code of Business Conduct.

ICE's Nominating and Corporate Governance Committee is responsible for devising and proposing to the Board of Directors a code of business conduct for directors, officers and employees addressing, at a minimum, conflicts of interest and compliance with applicable laws, rules and regulations, including compliance and enforcement mechanisms, and monitor compliance with such code of business conduct. The Nominating and Corporate Governance Committee reviews and approves, if deemed appropriate, all requests for waivers of the Global Code of Business Conduct.

In addition, conflicts of interests would be identified and assessed through ICE's quarterly financial disclosure procedures and annual director and officer questionnaires.

Managing business continuity & technology risks

(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected
FN-EX-550a.2

In accordance with applicable securities laws and regulations, ICE typically includes a description of material data breaches (including of the type, if any, described in FN-EX-550a.2 and TC-SI-230a.1) in our annual and quarterly filings on, respectively, Forms 10-K and 10-Q.

Description of efforts to prevent technology errors, security breaches, and market disruptions
FN-EX-550a.3

Technology and Operational Resilience

ICE maintains a robust technology infrastructure and business continuity strategy designed to ensure the reliability and security of our critical market operations.

Operational resilience framework – our comprehensive approach to operational resilience encompasses:

- Structured incident management processes
- Fault-tolerant and concurrently maintainable infrastructure designs
- Regular validation of operational readiness
- Board-level technology governance oversight

Infrastructure and technology – we implement redundancy strategies across:

- Critical operational systems
- Network and technological infrastructure
- Data management, data protection and recovery platforms

Organizational preparedness – our resilience strategy is supported by:

- Mandatory enterprise-wide business continuity training
- Proven incident response capabilities
- Mature disaster recovery and business continuity processes

By maintaining a dynamic and comprehensive approach to operational continuity, we mitigate potential disruptions and preserve the integrity of our critical services.

Cybersecurity

Additional detail on our approach to cybersecurity can be found in the Risk Management section of this report and our 10-K.

Environmental footprint of hardware infrastructure

(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable
TC-SI-130a.1

We report Scope 1, 2 and 3 emissions associated with our operations in the TCFD section of this report.

Discussion of the integration of environmental considerations into strategic planning for data center needs
TC-SI-130a.3

Our energy management program focuses on data centers where we can make the most impact. Our data centers use Power Usage Effectiveness (PUE) as a key metric for energy efficiency and have implemented energy-efficient techniques to reduce energy consumption and operating emissions. We have implemented various strategies to improve PUE, including data center air management, high-efficiency chillers, speed control on cooling equipment, installation of solar panels and automated lighting control systems.

Our data centers are built to meet stringent specifications, which have enabled us to obtain ISO 50001 certifications for the Chicago, IL; Mahwah, NJ; and Basildon, U.K. sites.

Data privacy & freedom of expression

Description of policies and practices relating to behavioral advertising and user privacy
TC-SI-220a.1

Users of ICE websites, applications and services have full informed control over tracking preferences. Analytics cookies may be used on some ICE web addresses to track user traffic across web properties. Individuals who browse ICE websites have full control over their cookie preferences and give their affirmative informed consent to the use of any cookies that are not strictly necessary for website functionality.

Number of users whose information is used for secondary purposes
TC-SI-220a.2

None. ICE uses personal information only for the specific purposes authorized.

Total amount of monetary losses as a result of legal proceedings associated with user privacy
TC-SI-220a.3

In accordance with applicable securities laws and regulations, ICE includes a description of material legal proceedings (including of the type, if any, described in TC-SI-220a.3) in our annual and quarterly filings on, respectively, Forms 10-K and 10-Q.

(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure
TC-SI-220a.4

ICE has received no requests for user information under the Foreign Intelligence Surveillance Act (FISA). ICE has provided user information pursuant to a criminal warrant less than five times and provided the information in each instance.

List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring
TC-SI-220a.5

China.

Data security

(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected, (3) number of users affected
TC-SI-230a.1

In accordance with applicable securities laws and regulations, ICE typically includes a description of material data breaches (including of the type, if any, described in FN-EX-550a.2 and TC-SI-230a.1) in our annual and quarterly filings on, respectively, Forms 10-K and 10-Q.

Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards
TC-SI-230a.2

See FN-EX-550a.3

Recruiting & managing a global, diverse & skilled workforce

Percentage of employees that require a work visa
TC-SI-330a.1

7%

Employee engagement as a percentage
TC-SI-330a.2

81% - We measure employee engagement in a number of ways including through the following question on our biennial employee survey: "Overall, I would recommend ICE to a friend as a good place to work." 81% of our employees agreed or strongly agreed with this statement in our most recent employee survey.

Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees
TC-SI-330a.3

We report gender and racial/ethnic metrics for our U.S. and U.K. employee populations in the Employee Data section of this report.

Intellectual property protection & competitive behavior

Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations
TC-SI-520a.1

In accordance with applicable securities laws and regulations, ICE includes a description of material legal proceedings (including of the type, if any, described in TC-SI-520a.1) in our annual and quarterly filings on, respectively, Forms 10-K and 10-Q.

Managing systemic risks from technology disruptions

Description of business continuity risks related to disruptions of operations
TC-SI-550a.2

We disclose risk factors in our Form 10-K including those related to operations.

Table 2.
Activity metrics

Transparent & efficient Capital Markets

Average daily number of trades executed, by product or asset class
FN-EX-000.A

We report trading volumes monthly across our exchanges and asset classes here: ir.theice.com/investor-resources/supplemental-information/default.aspx and daily volumes here: theice.com/marketdata/reports/176.

Average daily volume traded, by product or asset class
FN-EX-000.B

We report trading volumes monthly across our exchanges and asset classes here: https://ir.theice.com/investor-resources/supplemental-information/default.aspx and daily volumes here: theice.com/marketdata/reports/176.

Employee data

The data in this section is from 2024, covers our global employee base and does not include contractors and contingent workers unless indicated otherwise.

Employees	
Global	12,920
U.S.	7,747
EMEA, APAC and India	5,173

EMEA, APAC and India	
India	3,394
U.K.	789
Continental Europe	399

Annual voluntary turnover	
2024	8.4%
2023	8.1%
2022	14.2%
2021	10.5%
2020	5.5%

Note: Includes all full-time employees across our global locations, excluding Black Knight. Black Knight will be included starting in 2025 in conjunction with the integration of our HR systems.

Employee survey data	2018	2020	2022	2024
Participation rate	60%	71%	78%	77%
Overall, I would recommend ICE to a friend as a good place to work	NA[1]	85%	81%	81%
Overall positive responses	80%	81%	79%	83%

Note: 2018, 2020 and 2022 data do not include Black Knight

[1]This question was not included in our 2018 survey.

Diversity data

Board

Total number of directors	10

Female	6
Male	4

Black	2
Hispanic / Latino	0
Asian	1
White	6
Other	1

As of May 16, 2025

Employees
Global officers

Female	28%
Male	72%

U.S. employees

	Officers	Executives	Management	Staff
Female	26%	23%	30%	33%
Male	74%	77%	70%	67%
Asian	18%	23%	37%	35%
Black	5%	4%	4%	10%
Hispanic or latino	2%	2%	3%	5%
White	73%	66%	52%	45%
All other	2%	4%	4%	5%

U.K. employees

	Officers	Executives	Management	Staff
Female	44%	21%	26%	36%
Male	56%	79%	74%	64%
Asian	0%	25%	31%	41%
Black	0%	4%	5%	6%
White	89%	66%	57%	48%
All other	11%	5%	8%	6%

Notes: Data as of January 1, 2025. Race / ethnicity categories are used to align with the U.S. government reporting requirements. Additionally, U.K. definitions of race / ethnicity were mapped to align with the U.S. government definitions to allow for globally consistent reporting.

Our U.S. and U.K.-based employee population comprises of approximately 66% of our total employee population. This data does not include employees associated with Black Knight. Black Knight will be included starting with our 2025 report in conjunction with the integration of our HR systems.

EEO-1

We publish our EEO-1 reports on our website here.

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