

2025 SASB report

Sustainable Accounting Standards Board metrics

Table 1. Sustainability disclosure topics & accounting metrics

Code	Metric	2025 performance									
Transparent & efficient capital markets											
FN-EX-410a.1	(1) Number and (2) average duration of (a) halts related to public release of information and (b) pauses related to volatility	<table border="1"> <thead> <tr> <th></th> <th>Number</th> <th>Duration</th> </tr> </thead> <tbody> <tr> <td>Halt</td> <td>NYSE: 112 American: 65 Arca: 4</td> <td>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</td> </tr> <tr> <td>Pause</td> <td>LULDs (or single-stock circuit breakers): NYSE: 352 Arca: 226 American: 804</td> <td>LULD halts are 5 minutes long.</td> </tr> </tbody> </table>		Number	Duration	Halt	NYSE: 112 American: 65 Arca: 4	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: 352 Arca: 226 American: 804	LULD halts are 5 minutes long.
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FN-EX-410a.2	Percentage of trades generated from automated trading systems	<p>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.</p> <p>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.</p>									
FN-EX-410a.3	Description of alert policy regarding timing and nature of public release of information	<p>The NYSE Timely Alert procedures¹ for listed companies apply between the hours of 7 a.m. ET and 4 p.m. ET. NYSE-listed companies are required to use any Regulation FD compliant disclosure method² 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:</p> <ol style="list-style-type: none"> Between the hours of 7 a.m. and 4 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. 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. 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 or² 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). 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. <p>Additional details can be found in Section 202.05, 202.06 and 202.07 of the NYSE Listed Company Manual.</p>									

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 a.m. ET and 9:30 a.m. ET.

Code	Metric	2025 Performance
Transparent & efficient capital markets (cont.)		
FN-EX-410a.4	Description of policy to encourage or require listed companies to publicly disclose environmental, social and governance (ESG) information	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 Sustainability Resource Center .
Managing conflicts of interest		
FN-EX-510a.1	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	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.
FN-EX-510a.2	Discussion of processes for identifying and assessing conflicts of interest	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		
FN-EX-550a.1	(1) Number of significant market disruptions	None
FN-EX-550a.2	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of customers affected	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.
FN-EX-550a.3	Description of efforts to prevent technology errors, security breaches, and market disruptions	ICE ensures the physical and digital security of our markets, clearing houses, data and mortgage services through industry-leading technology and processes. Per policy, core procedures, systems and operational tasks are duplicable in recovery facilities, exercised at least annually and documented comprehensively. Our incident and crisis management program provides a cohesive framework for the communication, resolution and analysis of incidents to ensure that they are resolved in a planned and controlled manner and normal operations are quickly restored. The business continuity teams regularly conduct exercises to ensure our processes are ready to be successfully implemented. In addition, all employees are trained annually on our business continuity procedures to ensure readiness and understanding. Our operations team maintains an incident response program to manage any incident with operational impact – security or otherwise. System resiliency and business continuity management are core tenets of our system design process and redundancies are purpose-built into our applications, network infrastructure and across primary and backup data centers. Following each acquisition of a new company, its processes are reviewed to ensure incident and crisis management procedures are in place across our entire organization. Board oversight includes quarterly reports to the Risk Committee on technology operations and governance.

Code	Metric	2025 performance
Managing business continuity & technology risks (cont.)		
		<p>Cybersecurity</p> <p>Our Information Security Department consists of diverse and skilled teams that work to protect confidential data and systems from unauthorized access, misuse, disclosure, destruction, modification or disruption.</p> <p>We employ the activities, processes and strategies to help evaluate, manage and address these risks, which are described in our 10-K.</p> <p>Additional details are available in our Privacy & Security Center.</p>
Environmental footprint of hardware infrastructure		
TC-SI-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	We report Scope 1, 2 and 3 emissions associated with our operations in our TCFD report.
TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data center needs	<p>Our energy management program focuses on data centers where we can make a material 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.</p> <p>Our data centers are built to meet stringent specifications, which have enabled us to obtain ISO 50001 certifications for the Chicago, I.L.; Mahwah, N.J. and Basildon, U.K. sites.</p>
Data privacy & freedom of expression		
TC-SI-220a.1	Description of policies and practices relating to targeted advertising and user privacy	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.
TC-SI-220a.2	Number of users whose information is used for secondary purposes	None. ICE uses personal information only for the specific purposes authorized.
TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	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.
TC-SI-220a.4	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	ICE has received no requests for user information under the Foreign Intelligence Surveillance Act ("FISA").
TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	China.
Data security		
TC-SI-230a.1	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of customers affected, (4) number of users affected	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.

Code	Metric	2025 performance
Data security (cont.)		
TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	See FN-EX-550a.3
Recruiting & managing a global, diverse & skilled workforce		
TC-SI-330a.1	Percentage of employees that require a work visa	8.5%
TC-SI-330a.2	Employee engagement as a percentage	82% – 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.” 82% of our employees agreed or strongly agreed with this statement in our most recent employee survey.
TC-SI-330a.3	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) technical employees, and (d) all other employees	We report gender and diversity metrics for our U.S. employee populations here: ice.com/about/corporate-responsibility .
Intellectual property protection & competitive behavior		
TC-SI-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	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 disruption		
TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	We disclose risk factors in our Form 10-K including those related to operations.

Table 2. Activity metrics

Transparent & efficient capital markets		
FN-EX-000.A	Average daily number of trades executed, by product or asset class.	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 .
FN-EX-000.B	Average daily volume traded, by product or asset class	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 .