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2020 Sustainability Report



Letter from Chairman + CEO



In this sixth annual report, we continue to evolve how we approach and report on ESG matters. As each year passes, we are doing more and disclosing more when it comes to sustainability. In particular this year, our report is tailored to focus on issues that are most impactful for our business and stakeholders.

By adopting new reporting standards and gathering stakeholder feedback, we strive to provide comparable ESG disclosures that shed light on the issues of most interest to our employees, stockholders, customers and communities.

Our approach to ESG reporting is to be straightforward and plainspoken about what we are doing. We aim to set realistic goals and not overstate or obscure where we are in our process. That doesn't preclude us from being aspirational in our thinking - we know to meet the great sustainability challenges the world faces will require innovation, new technologies and out-of-the-box thinking beyond what all of us are capable of today.

On the following pages, we provide updates on steps we are taking to mitigate our carbon footprint and increase our employee and board diversity, among other important topics. We also outline how we, as a business, are helping others do the same. From the carbon markets we operate, to the ESG data we provide investors, to the ways we help NYSE-listed companies enhance their ESG disclosures - we are making a significant impact that extends beyond the walls of our offices.

Thank you for your interest in this report. We welcome your feedback as we continue to evolve how we approach and report on sustainability.



Jeffrey C. Sprecher
Chairman and CEO, Intercontinental Exchange
Chairman, New York Stock Exchange

We know to meet the great sustainability challenges the world faces will require innovation, new technologies and out-of-the-box thinking beyond what all of us are capable of today.



What's new?

The following is a brief summary of environmental, social and governance highlights from 2020. A more comprehensive view of our ESG policies and metrics can be found in the ESG Data section of this report and on our [website](#).

Approach

To ensure we fully understand the views of our stakeholders, we worked with a third-party consultant to conduct a formal materiality analysis to gather feedback from our employees, customers, investors, suppliers and communities. [↗](#)

Reporting standards

Reporting standards are a critical tool to help make consistent comparisons year to year and company to company. This year we added three reporting standards to enhance our disclosures:

- Sustainable Accounting Standards Board (SASB) metrics for the exchange sector
- Taskforce for Climate-related Financial Disclosures (TCFD) aligned reporting
- UN Sustainable Development Goals

Environmental

We are publishing, for the first time, our greenhouse gas emissions, including full Scope 1 and 2 emissions. We are also reporting Scope 3 emissions for items on which we can identify or approximate reliable data including employee business travel, commuting and waste. Having established this baseline, we are actively working to set reduction targets and expect to announce our plans next year.

In the meantime, we are addressing all of our Scope 1 and 2 emissions, as well as those Scope 3 emissions that we can credibly calculate, through the purchase of verified carbon offsets and renewable energy certificates.

Social

While social factors do not always lend themselves to quantifiable data points, we are working to better capture our human capital management and other social efforts through metrics that can be tracked year to year. That includes:

- New diversity disclosures for our employees and Board members
- Employee engagement and development metrics
- ROI and demographic metrics for our investments in financial education

We are also reporting progress on our efforts to support under-served entrepreneurs, including black-owned businesses, increase diversity on boards at NYSE-listed companies, and give more to our communities as we continue to battle the challenges of COVID. Developments in 2020 include:

- Planning for launch of Entrepreneurship Bootcamp series
- New digital platform for NYSE Board Advisory Council
- Increase in employee charitable match
- \$10 million in donations to COVID-related charities

Approach

As we enter our third decade, the core competencies that have driven our evolution remain the same. From our start as a small business in Atlanta focused on a niche over-the-counter energy market, to the global data and technology company we are today, our purpose has remained: to connect people throughout our networks to opportunity by providing transparency, market efficiencies and insights.

While the terms “sustainability” and “ESG” were not ones we used 20 years ago, they represent concepts that have been a part of our company since the beginning. In recent years, our approach to managing ESG risks and opportunities and reporting them to our stakeholders has evolved and formalized, and will continue to do so.

This section summarizes how we approach, manage and engage with our stakeholders on ESG matters.

Governance

Board of Directors

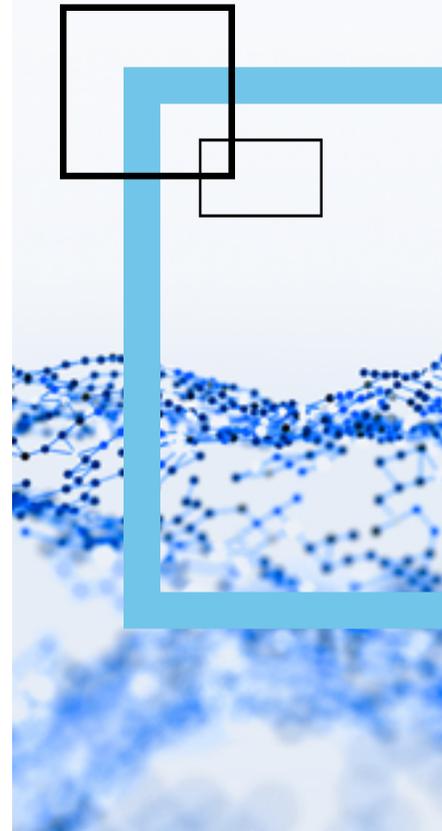
At the Board level, our directors are focused on ESG risks and opportunities at both the full board and on multiple committees.

At the committee level, ESG falls under the mandate of the Nominating and Corporate Governance Committee, which is charged with reviewing and assessing the company's environmental, social and governance initiatives and making recommendations to the company to further its ESG goals ([NCGC Charter](#)). The Nominating and Corporate Governance Committee reviews ESG matters at two or more meetings each year.

In addition to the mandate of the Nominating and Corporate Governance Committee, certain ESG items are a focus for other committees including climate change at the Risk Committee and human capital management issues, including diversity and pay parity, at the Compensation Committee.

Our purpose

Combine data, technology and expertise, to connect people to opportunity through our unique digital networks [🔗](#)



Management

Our strategy is guided by an ESG Governance Committee made up of senior officials from across the company including the President, Chief Financial Officer, Corporate Risk Officer, Human Resources Officer, Chief Regulatory Officer, General Counsel and Presidents of the NYSE, Fixed Income & Data Services, ICE Futures Europe, ICE Futures U.S. and ICE Mortgage Technology. This committee meets quarterly and communicates frequently between meetings to assess our ESG risks and opportunities across the company.

Our ESG efforts are coordinated by our Vice President of Sustainability.

In addition to these formal structures, several departments play a critical role in our approach to sustainability including the human resources, facilities, risk management and business continuity preparedness teams.

We continue to evolve and expand our ESG strategy and disclosures. We are focused on the issues that are material for our stakeholders and where we think we have the best chance to make a meaningful difference.

Brookly McLaughlin
Vice President of
Sustainability



Stakeholder engagement

To ensure we fully understand the views of our stakeholders, we worked with a third-party consultant to conduct a formal materiality analysis to gather feedback from our employees, customers, investors, suppliers and communities. We reached out to more than 100 of our internal and external stakeholders from across our business to identify what they view as our biggest ESG risks and opportunities.

The results of that exercise largely reaffirmed our earlier assessments of which ESG issues are of the highest importance to our business and stakeholders.

We identified 16 material issues for our assessment, drawing from a number of references: ESG ratings, ESG reporting frameworks and desktop research of peers and industry trends. The table below provides a summary of the results of this assessment and the relative prioritization of these issues. As we continue to enhance our ESG strategy and reporting, we will focus on management of these top issues as areas of significant opportunity for both our business and stakeholders. We will also continue to manage, monitor, and report on the other issues identified in this exercise and to periodically update this assessment to continually improve our strategy.

	Environmental	Social	Governance
Tier 1: Prioritize	<p>Support continued development of environmental markets:</p> <p>Facilitate the development of environmental markets through data, technology and expertise and by offering new products and services.</p>	<p>Human capital management:</p> <p>Ability to attract and retain global skilled talent. This includes acquisition of talent, retention, training and development, succession planning, responsible approaches to mergers and acquisitions, and active participation of employees in company activities, motivation and enthusiasm for their work and overall satisfaction. Fair and unbiased compensation structures, including equal pay for work of equal value.</p> <p>Diversity & inclusion:</p> <p>Diverse representation across ICE's workforce and maintaining an environment where employees feel welcomed, respected, supported, and valued to participate and succeed.</p>	<p>Cybersecurity & data protection:</p> <p>Protecting information managed by ICE from unwanted parties and unauthorized access, such as security threats and cyberattacks. Ensuring customer, employee, and corporate data are being collected, analyzed, stored, shared and transferred in a secure manner that upholds privacy and protects personal data from unwanted parties.</p> <p>Risk management & business continuity:</p> <p>Conducting ICE's business in an ethical way that not only complies with all regulations, but also protects and builds the company's reputation as a responsible business. This includes promoting competitive behavior; working against corruption and money laundering, extortion, and bribery; paying taxes, encouraging the use</p>

	Environmental	Social	Governance
Tier 1: Prioritize			<p>of ethics hotlines and grievance mechanisms, etc. Identification and oversight of risks to exchange disruptions, including halts, pauses related to volatility, disaster recovery, systems performance issues, and systems service disruptions. The timely, accessible and accurate disclosure of performance, goals and policies related to the company's ESG activities and impacts, and the use of such disclosures to drive change at a company or wider systems level.</p> <p>Board diversity: Diversity of ICE's Board of Directors.</p>
Tier 2: Manage	<p>Climate risks, GHG disclosures, reduction targets:</p> <p>The physical and financial risks of climate change for ICE (e.g. extreme weather events, natural disasters; and increased energy costs), and ICE's ability to recover from and manage climate risks across its operations and supply chain. Greenhouse gas (GHG) emissions from ICE's operations, including direct activities (Scope 1), purchased energy (Scope 2), and supply chain emissions (Scope 3). ICE's total energy use and use of renewable energy in operations (including offices and data centers).</p>	<p>Employee wellbeing, health & safety:</p> <p>Safety of ICE employees and visitors against workplace accidents and chronic or acute health impacts. Building a work environment where our associates feel fulfilled and productive, and supporting them and their families in leading healthy lives.</p>	<p>Board independence:</p> <p>Independence of ICE's Board of Directors</p> <p>ESG governance:</p> <p>Oversight of ESG issues at the highest level of the organization. Supporting the ability of investors and other stakeholders to make more sustainable decisions through access to ESG data.</p> <p>Lobbying, advocacy & policy influence:</p> <p>Transparency of lobbying efforts, and alignment between ICE's ESG commitments and lobbying practices including efforts to influence public policy development through direct engagement or through multi stakeholder associations or initiatives.</p>

	Environmental	Social	Governance
Tier 2: Manage			<p>NYSE issuer ESG engagement:</p> <p>Supporting the development of ESG strategy and reporting by corporate issuers through ESG reporting guidance, sharing of best practices, and other resources. Promoting open and timely communication of material information by issuers.</p> <p>Executive compensation & incentives:</p> <p>Executive compensation and incentives tied to ESG metrics / nonfinancial performance goals / other incentives based on alignment with stakeholder benefits.</p>
Tier 3: Monitor	<p>Supply Chain - Environmental Impact:</p> <p>Transparency and oversight in ICE's procurement practices to ensure suppliers and purchased goods and services are environmentally responsible.</p> <p>Water & waste:</p> <p>Water use, intensity, and disposal in ICE's operations, including impacts on the local waterways and local environment. Operations in areas of high water stress and efforts to reduce water related risks. Solid waste generation and disposal in ICE's operations, including appropriate disposal of e waste.</p>	<p>Community engagement:</p> <p>Building long term value in communities where ICE employees live and work. Investing in local communities via charitable contributions. Partnering with groups who value diversity and working to enhance diverse representation across partner organizations. Supporting stakeholders to enhance understanding of finance, capital markets, responsible investing, compliance, and exchanges. This spans from financial literacy delivered to grade school and high school students to training for professional traders.</p> <p>Supply Chain - Social Standards:</p> <p>Labor issues in the supply chain, such as working hours, health and safety, age of workers, remuneration, sexual harassment, human trafficking/modern slavery, freedom of association, and collective bargaining. This includes both materials suppliers and services suppliers (e.g. digital services, construction, janitorial, catering).</p>	

Reporting

This report marks our 6th annual Corporate Responsibility Report, a document that has evolved each year to better capture the key issues of interest to our stakeholders. While the annual report is an important opportunity to measure progress over the previous year, it is also, by its very nature, a static document that is unable to keep up with developments taking place on an almost daily basis. For that reason, we use this document to highlight new developments and progress, but rely on our [ESG website](#) to anchor our ESG reporting and provide an up-to-date view of where we are.

This report covers the year 2020 across our approximately 9,000 employees who are based in 45 cities and more than 20 countries. In September of 2020, we acquired Ellie Mae, a mortgage technology company headquartered in California. We will fully incorporate Ellie Mae in our report covering full year 2021. Unless otherwise noted, Ellie Mae's operations are not incorporated in this report.

Supply chain management

In addition to steps we are taking within our own business, we are also looking into the impact we can have through our supply chain, including:

- **Vendor Onboarding** - Through our vendor onboarding and annual assessment processes we are collecting certain ESG data points to inform our decision making.
- **Code of Conduct** - Our business partners and third parties are an extension of our organization. We expect that our suppliers, agents and business partners will follow ethical standards similar to our own when working with us or on our behalf. This means that we will consider terminating contracts with vendors or partners that do not meet our high standards or contractual obligations. [🔗](#)
- **Human Rights** - Our [Modern Slavery Act Policy](#) reflects our commitment to acting ethically and with integrity in all ICE business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

ESG data

We report both metrics and narrative data across the environmental, social and governance issues most relevant for our company.

In addition to our annual corporate responsibility reports and regular shareholder filings, we provide important information throughout our website on how we approach sustainability issues. We encourage our stakeholders to view these pages for additional details and the most up to date information.

Reporting standards

This year we supplemented our reporting with three sustainability standards each providing a different context for looking at comparable information.

Sustainable Accounting Standards Board (SASB) [↗](#)

SASB (recently renamed Value Reporting Foundation) calls for a relatively narrow set of metrics that are specific to the sustainability risks and opportunities inherent in a particular subsector - for example, Security and Commodity Exchanges.

UN Sustainable Development Goals (SDGs) [↗](#)

The UN SDGs were adopted in 2015 to rally governments, companies and organizations around the world to work together to tackle the global community's biggest problems including poverty, hunger and inequality. In this report, we list the SDGs with which we align ourselves.

Resources

[Sustainability website](#) [↗](#)

[ESG Data](#) [↗](#)

[Annual Report & Proxy](#) [↗](#)

[Board of Directors](#) [↗](#)

[Governance Overview](#) [↗](#)

[Modern Slavery Act Statement](#) [↗](#)

[Data Protection](#) [↗](#)

[Security](#) [↗](#)



Environmental

Our ability to make a difference with respect to the environment includes (1) the steps we take to mitigate the impact our operations have on the environment, (2) our efforts to address and reduce the risks to our company from climate change, and (3) the opportunities created by our climate-related products and services across market infrastructure and data.

Addressing our footprint [↗](#)

This year, for the first time, we are publishing our greenhouse gas emissions, including full Scope 1 and 2 emissions. We are also reporting Scope 3 items for which we can identify or approximate reliable data. We will continue to evolve our Scope 3 reporting as better data and modeling becomes available. Our calculations were done using the GHG Protocol and with assistance from a third-party firm with expertise in this area. Details are provided in the table below.

Having established a baseline, we are actively working to set reduction targets and expect to announce our plans in our Corporate Responsibility Report next year.

In the meantime, as we started to do in 2019, we are taking steps now to fully address our Scope 1 and 2 emissions, as well as those Scope 3 emissions that we can credibly calculate, through the purchase of verified carbon offsets and renewable energy certificates.

Assessing climate risks and opportunities

TCFD

We are looking closely at the potential impact of climate change to our operations and are using a Task Force for Climate-related Financial Disclosures style framework to assess those risks and opportunities. In this report we are including some initial TCFD-aligned reporting and expect to continue adding to these disclosures in future reports.

What's new?

**Scope 1, 2 and 3
emission disclosures** [↗](#)

Governance

As outlined earlier in this report, ESG matters are explicitly included in the mandate of the Nominating and Corporate Governance Committee and discussed regularly there as well as at the full Board level. Additionally, climate risks are discussed at our corporate Risk Committee as well as at the business unit level subsidiary boards across the company.

At the management level, our ESG Governance Committee meets quarterly and communicates frequently between meetings to assess our risks and opportunities across the company, including climate related risks. That committee includes the President, Chief Financial Officer, Corporate Risk Officer, Human Resources Officer, Chief Regulatory Officer, General Counsel and Presidents of the NYSE, Fixed Income & Data Services, ICE Futures Europe, ICE Futures U.S. and ICE Mortgage Technology. Our ESG efforts are coordinated by our Vice President of Sustainability with active roles across several teams including:

- **Risk:** Our global Enterprise Risk Management team, led by our Corporate Risk Officer, has developed an approach, based on the TCFD framework, to assess impacts of climate-related risks and issues in consultation with leadership across the organization. Analysis is provided to the ESG Governance Committee with the aim of providing a holistic climate change risk management approach as well as an evaluation of enterprise-wide risks and opportunities related to climate change. Additionally, Enterprise Risk Management personnel collaborate with decision makers throughout each of the functional business lines to ensure that climate risks and opportunities are being appropriately contemplated at all levels of the organization. Enterprise Risk Management's approach to climate change risk is overseen by the ICE Risk Committee.
- **Facilities:** Our facilities team is engaged in efforts to account for and reduce our greenhouse gas emissions across the organization.
- **Business Continuity:** The business continuity team regularly assesses the physical security of our locations to ensure we are able to continue meeting the needs of our customers.
- **Products and Services:** Our Sustainable Finance Product Steering Committee meets monthly on a formal basis and communicates daily on an informal basis on the creation of market tools and data that will help drive progress toward global climate goals.

Our Corporate Risk Officer reports to the Board's Risk Committee each quarter. Our Vice President of Sustainability reports to the Nominating and Corporate Governance Committee at least twice each year. Both Committees report up to the full Board and ESG issues, including those related to climate, are further discussed there as warranted.

Strategy

In line with the TCFD framework, our climate risk assessment includes the categorization of physical and transitional risks as well as consideration across the following horizons: short-term (approximately one year away); medium-term (approximately five years away); and long-term (approximately ten years away).

Risks and opportunities identified are also assessed in line with the time horizons based upon which they are deemed most likely to materialize should the risk be unmitigated, or the opportunity actioned upon. Because our businesses connect diverse market participants across a broad range of asset classes, risks and opportunities assessed are evaluated in conjunction with the business unit with which they are most closely associated.

Risks and opportunities we are focused on include:

Physical

- Operational & resilience – The resilience risk associated with a one-off weather event and how ICE may be impacted.
- Environmental evolution – Risks and opportunities presented to ICE as physical assets, underlying markets, products and customers are impacted by climate change.

Transitional

- Market change – Risks and opportunities presented to ICE as the markets we serve and products we offer evolve.
- Regulatory change – Risks and opportunities presented by changes in regulation that impact ICE customers, products and/or markets.

Strategy

While we - like many companies - may have exposure to physical and transitional risk elements, it is the transitional risk components that may provide ICE with more significant opportunities and risks. As a provider of market infrastructure and data, ICE has a significant role to play through the transition in facilitating price discovery, providing transparency through data and analysis, and ultimately enabling customers to manage risk. When assessing climate change risk, consideration is given to potential revenue, cost, regulatory, reputational, and operational impact. We consider extreme, but plausible scenarios as part of the approach to climate change risk management, including the consideration of more frequent and higher impact weather related events impacting our customers and the wider macro economy during transition.

We expect to include additional details, such as a scenario analysis, in future reports.

Risk Management

Identifying and assessing risks

Our approach to identifying, assessing, and managing climate-related risks is informed by experts across our organization and draws on a vast array of resources both within and external to our organization.

Enterprise Risk Management personnel engage with a comprehensive cross-section of management that oversee a wide range of the company, including, but not limited to sustainability, business operations, business continuity and disaster recovery, facilities, and management in client facing roles. Each of those conversations focuses on potential risks presented by a changing climate, as well as opportunities presented by changing consumer habits and marketplace preferences.

As a leading data and technology company, we have access to a broad and diverse set of market participants and stakeholders. Communication with these stakeholders, including our NYSE-listed issuer community, participants in our futures markets and clearing houses and mortgage technology colleagues, has also informed our climate-related risks assessment.

Members of the Enterprise Risk Management team, in conjunction with experts across our organization, identified pertinent climate-focused risks and opportunities in alignment with the TCFD. As part of our company-wide Business Continuity and Disaster Recovery protocols, ICE regularly evaluates site facilities to assess environmental changes and the likelihood and potential affects that an interruption to critical business operations may have because of a natural disaster. Additionally, strategically diverse operational centers, employee distribution, and robust application and network security and operational protocols ensure we are prepared to serve our customers in all circumstances.

Managing risks

Once our teams identify a significant risk, we evaluate it using our internal Risk Rating Matrix, which assesses both the likelihood - across multiple time horizons - as well as potential impacts (evaluated by operational, reputational, financial, etc.). Each risk is assigned an overall score of very low, low, medium, high, or critical. Each risk is also assigned a "risk owner" with whom Enterprise Risk Management will work to ensure that each risk is appropriately mitigated and managed in accordance with its risk score. This evaluative process parallels how we think about and manage non climate-focused risks as well.

Integration into overall risk management process

Risks identified through our Enterprise Risk Management processes are embedded into our overall risk management program, which has broad visibility and input from stakeholders across our organization.

Risks are regularly evaluated on a company-wide basis. The frequency and methods by which risks are assessed are informed by a comprehensive strategy which factors in the nature of the risk, the risk score assigned to that risk should it be realized, the strength of the control regime associated with that risk's profile, and the potential implications of that risk being realized.

Additionally, each business that we operate evaluates climate-focused risks with specific implications for the business from dedicated senior management teams, as well as its specialized Boards of Directors and Risk Committees, where applicable.

Metrics & Targets

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 climate-related risks including energy consumption, waste management, and business travel. Our energy management efforts especially focus on our data centers, which account for a large portion of our electricity consumption and our greatest opportunities for mitigation.

Our data centers have implemented industry leading techniques to improve energy efficiency, reduce waste and offset operating emissions. The building structures provide a high level of insulation and minimize outside air infiltration, reducing solar heat gains, lowering thermal losses and delivering a more efficient cooling profile and lower energy demand.

The most commonly used and cited metric for data center energy efficiency is Power Usage Effectiveness (PUE). At our data centers, we have consistently delivered a PUE that has outperformed the base building design by up to 14% by implementing multiple mitigation tactics including: optimized thermal stratification, data center air management, high efficiency HVAC chillers, speed control on cooling equipment and automated lighting control systems.

Our Basildon data center was built to stringent specifications allowing us to attain the following ISO accreditations:

- ISO 9001
- ISO 14001
- BSEN 18001
- ISO 50001

Greenhouse gas emissions

Metrics	Activity	Emissions	Unit
Scope 1	Fuel use (stationary)	958	tCO2e
	Fuel use (mobile)	191	tCO2e
	Refrigerants	3,419	tCO2e
Total		4,568	tCO2e
Scope 2	Electricity (location-based)	48,343	tCO2e
	Electricity (market-based)	40,844	tCO2e
	Steam	2,110	tCO2e
Total (location-based)		50,452	tCO2e
Total (market-based)		42,954	tCO2e

Metrics & Targets

Greenhouse gas emissions

Metrics	Activity	Emissions	Unit
Scope 3	Category 3: Fuel & energy-related activities	14,675	tCO ₂ e
	Category 5: Waste generated in operations	484	tCO ₂ e
	Category 6: Business travel	906	tCO ₂ e
	Category 7: Employee commuting	2,996	tCO ₂ e
Total		19,061	tCO ₂ e
Total Scope 1, 2, & 3 (location-based)		74,082	tCO ₂ e
Total Scope 1, 2, & 3 (market-based)		66,584	tCO ₂ e

* Includes Ellie Mae

** Business travel includes flights; once better data is available additional modes of transportation will be included

Reduction targets

We expect to announce our plans for reduction targets in 2022.

In the meantime, we have purchased 137,238 Energy Attribute Certificates (EACs) to match electricity consumption at our offices and data centers. Vintages and geographies were matched when available, including Green-e certified RECs to offset our US electricity consumption. We are also purchasing 26,000 tCO₂e verified carbon offsets to match our reported Scope 1, Scope 2 (excluding Electricity-related emissions that are addressed through EAC purchases) and Scope 3 emissions.

Opportunities: ESG products and services

The establishment of transparent, market-based pricing systems and availability of data helps companies allocate resources and invest in new technologies and innovative, sustainable solutions. Through our data, technology and expertise, we help make that possible.

Exchanges

The exchanges we operate globally, across asset classes, are playing a critical role helping investors and businesses make more sustainable decisions.

We were early investors in the development of global emissions markets with our acquisition of the Climate Exchange in 2010 and we continue to support market-based solutions to environmental challenges.

Cap and trade emission and renewable energy markets

ICE's products provide open markets, price discovery and transparency, helping to create a price for carbon. [↗](#)

Learn more

What are “cap and trade” programs and how do ICE's products support them? [↗](#)

ICE supports government-mandated markets through our secondary futures markets based in the EU, U.K. and North America. Annual carbon allowance trading on ICE is equivalent to approximately 40% of the world's total annual emissions footprint based on current estimates. Our programs include the following:

Description	ICE Role	
<p>European Emissions Trading</p>	<p>The EU Emissions Trading System (EU ETS) is a cornerstone of the European Union's policy to combat climate change and is a key tool for reducing industrial greenhouse gas emissions cost-effectively. Being the first – and largest – international system for trading greenhouse gas emission allowances, the EU ETS covers approximately 10,000 installations in the power sector and manufacturing industry, as well as airlines operating between EU countries.</p>	<p>ICE Futures Europe lists futures and options contracts for EU allowances, EU aviation allowances, and Certified Emissions Reductions. Since launching in 2005, contracts accounting for more than 99 billion tons of carbon emissions have traded on the ICE platform.</p>
<p>California Cap and Trade Program</p>	<p>The State of California passed a law in 2006 to reduce greenhouse gas emissions to 1990 levels by 2020. The program, which covers large industrial emitters as well as electricity generators and importers, kicked off in 2013 and expanded to include transportation fuels in 2015. In 2014, the Canadian province of Quebec linked its carbon cap and trade program to California's.</p>	<p>ICE Futures U.S. lists futures and options contracts based on the California Carbon Allowances that form the basis of California's cap and trade program. Since launching in August of 2011, market participants have traded contracts accounting for more than 5.7 billion tons of emissions related to California's program on the ICE platform.</p>
<p>Regional Greenhouse Gas Initiative</p>	<p>The Regional Greenhouse Gas Initiative (RGGI) was the first market-based greenhouse gas reduction program in the U.S. It launched in 2009 with participation from several states in the Northeast. Following a program review in 2012, RGGI set a new 2014 cap of 91 million short tons that will decline by 2.5% a year through 2020. RGGI states sell nearly all emission allowances through auctions and invest proceeds in energy efficiency, renewable energy and other consumer benefit programs. These programs are spurring innovation in the clean energy economy and creating green jobs in the RGGI states.</p>	<p>ICE Futures U.S. lists futures and options contracts based on RGGI allowances and market participants have traded contracts accounting for more than 1.9 billion tons since trading began in 2008 on the ICE platform.</p>
<p>Renewable Energy Certificates</p>	<p>Renewable Energy Certificates (RECs) are used to track and account for the use of renewable energy including for the purposes of state-administered programs that require electric utilities to use a prescribed amount of renewable energy.</p>	<p>ICE Futures U.S. lists futures and options contracts based on renewable energy programs run by the States of Connecticut, Maryland, Massachusetts, New Jersey, Pennsylvania and Texas. Since launching trading of RECs in 2009, market participants have traded contracts accounting for more than 237 million certificates on the ICE platform.</p>

The role of price discovery in the energy transition

Additionally, ICE's futures markets provide price discovery across all forms of energy - from fossil fuels like oil and coal to renewable energy like wind and solar. The ability to price energy across that spectrum is necessary for the global economy to make the transition to cleaner fuels. [🔗](#)

How NYSE helps issuers navigate ESG

To help issuers navigate the evolving ESG landscape, the NYSE provides resources and platforms for dialogue between issuers and investors. We do that through our network, global visibility platform, shared insights and investor engagement. [🔗](#)

Learn more

[What are "green attribute" markets and how do ICE's products support them? \[🔗\]\(#\)](#)

NYSE ESG Guidance

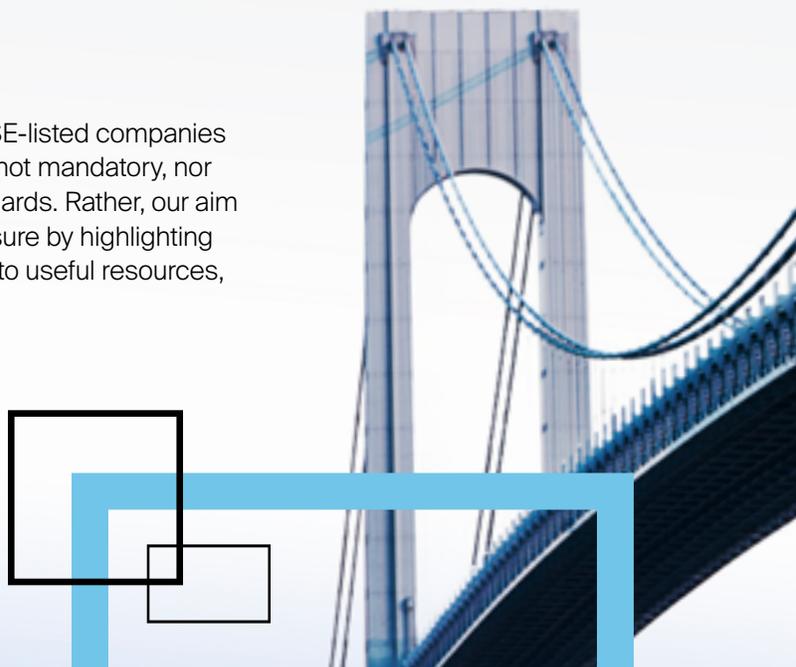
Our best practices for sustainability reporting aim to help NYSE-listed companies navigate the world of ESG reporting and disclosure. They are not mandatory, nor intended to replace existing disclosure frameworks and standards. Rather, our aim is to facilitate companies moving forward on their ESG disclosure by highlighting key elements of good quality reporting and drawing attention to useful resources, including those provided by the NYSE's ESG advisory team.

[Learn more \[🔗\]\(#\)](#)

Sustainable investment opportunities

Our exchange-traded products also provide opportunities for investors to integrate ESG into their investment process through tools such as ESG index futures and ETFs.

- MSCI ESG Index futures - After launching MSCI ESG index-linked futures in late 2019, we saw steady growth in trading throughout 2020, with strong pick up in open interest taking place in 2021 [🔗](#)
- NYSE-listed ESG ETFs - We listed six new ESG ETFs at the NYSE during 2020; ESG ETFs listed on NYSE Arca had \$5.84 billion in cash inflow throughout the course of 2020 [🔗](#)



Fixed Income & Data Services

ESG is a growing area of focus across our fixed income and data services business, including new products to help the buy-side make more sustainable decisions about where they are investing.

ESG reference data

Part of our broader reference data offering, this service includes detailed ESG attributes and indicators for more than 4,000 publicly-traded companies based in the U.S. and across Europe. [🔗](#)

Climate risk in the muni bond market

Climate-related events have been model inputs used by insurance companies since the early 1990s. With rising sea levels and increases in the frequency and destructive power of hurricanes, floods, droughts and wildfires, investors in the municipal finance sector increasingly need a combination of catastrophe and climate change scientific data to add to risk models. ICE's climate risk data applies geospatial climate, economic and demographic data to specific municipalities and securities. This new level of transparency allows municipal market participants to make informed investment decisions on recently issued bonds or securities that may have high climate risk exposure in an existing portfolio. [🔗](#)

ESG indices

ICE Data Indices has a range of solutions to support the growing demand for responsible and sustainable investing. These include fixed income sustainable benchmarks that account for a variety of ESG factors, thematic equity indices with ESG overlays and a family of indices that track the global carbon futures markets. [🔗](#)

Social

Human capital management

Highly capable and engaged teams living in healthy and thriving communities are critically important to our ability to grow and innovate.

Culture

Our culture is based on a set of core values that govern how we interact with each other and approach our work on a daily basis. These values form the framework for our employee development programs and are embedded into our performance review process.

Employee engagement

We use a mix of channels to gather input from employees throughout our organization. Formal methods include our biennial employee survey and a formal annual review process. Additionally, we cultivate an environment that encourages constant conversations across and within teams to provide informal and real-time feedback loops at all levels.

Survey

We conducted our biennial employee survey in November of 2020. As in past surveys, our questions were framed around the core values that form the basis of our culture.

Participation in the 2020 survey was 71%, up from 60% in 2018. Overall employee engagement was 85%, measured by agreement with the commonly cited benchmark statement: "Overall, I would recommend ICE to a friend as a good place to work." On average, responses were overwhelmingly positive and reinforced our focus on areas such as employee development for continued investment. Our next survey will be conducted in 2022.

2020 Results



Our core values



Integrity and professionalism

We hold ourselves and each other to the highest standards



Collaboration

We work as one team focused on a common set of objectives and committed to each others' success



Communication

We communicate clearly, constructively and frequently



Leadership

We lead by example



Problem-solving

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

Employee development

Employee development is an area where we have increased our focus and investment over the past few years. In 2020, we created our first employee development director position to build upon our existing employee development programs, transition them to virtual settings where they were not already, and develop new ones tailored to our needs as a growing company.

That work in 2020 led to refinements of our existing programs as well as the launch in 2021 of several new programs, which we'll report on further in our Corporate Responsibility Report next year.

Our current offering includes the following components:

Required training

- All employees and contractors are required to complete training at least annually on several of our compliance, security, human resource, and business continuity policies.
- All new hires are required to attend a business overview session during their first quarter to learn more about the full breadth of our business, as well as our culture, values and history.
- Employees hired into, or promoted to, manager, director and senior director positions are required to complete a series of courses focused on people management skills, HR policy, hiring, and unconscious bias.

On-demand resources

- We have over 1,000 online courses available on an on-demand, when-needed basis that cover topics from technical skills to soft skills.

Opt-in career and professional development

- We offer several leadership development programs that employees can opt into or be nominated for. These programs include multiple sessions over the course of six months or more with a mix of assessments, third-party instruction, peer-learning discussions and presentations by internal subject matter experts.
- Employees at all levels can enroll in one-off or limited-series interactive sessions on a range of development topics throughout the year including: communication skills, emotional intelligence, teamwork, managing your personal brand, building credibility, preparing to lead and mapping your career.

Job-related skills and corporate education

- Additional training programs are available, and in many cases mandated, for specific jobs that require technical training and product knowledge.

What's new?

Employee engagement and development metrics [🔗](#)

ROI and demographic metrics for our investments in financial education [🔗](#)

Entrepreneurship Bootcamp series [🔗](#)

New digital platform for NYSE Board Advisory Council [🔗](#)

Increase in employee charitable match [🔗](#)

\$10 million in donations to COVID-related charities [🔗](#)

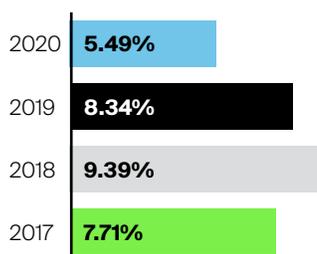
In 2020:

- All employees and contractors were required to complete training on our policies covering:
 - Code of Conduct
 - Anti-Harassment
 - Cybersecurity
 - Business Continuity Planning
 - Physical Security Procedures
- Additionally, relevant job types and business units were required to complete specific training that covered topics such as anti-money laundering, anti-bribery, hiring manager practices, data governance and regulatory compliance.
- Approximately 200 employees hired into or promoted to manager, director and senior director levels completed an eight-month program covering people management skills and an overview of our business.
- Nearly 2,000 employees accessed our online training portal and completed approximately 13,000 hours of optional training.
- More than 500 new hires completed our new hire business overview covering ICE's business, culture, values and history.

Turnover

As a result of our company's M&A activity, we have seen significant increases and decreases in our headcount related to acquisitions and divestitures. With over 30 acquisitions and a few notable divestitures since our company was founded in 2000, we have developed a robust methodology to quickly address unique employee concerns that arise in an M&A setting and one that guides new employees into the ICE ecosystem in a supported manner. These acquisition onboarding 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, understanding our culture, understanding our policies and making meaningful connections.

Additionally, we pay close attention to our voluntary attrition rates and believe it's an important indicator. In recent years, that rate has remained under 10%, which is below relevant and comparable benchmark levels in both the finance and technology sectors:



Benefits

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 in line with industry and local norms. That includes parental leave, which in most cases exceeds legally-required amounts.

Through Employee Assistance Plans 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 an employer match program in the U.S., and an Employee Stock Purchase Plan available in nearly all our locations.

Diversity

Our approach to diversity is focused on three pillars: our employees, Board of Directors and our network.

Employees

Throughout our ranks, we are working to increase diversity with an objective that our employee population reflects the broader communities where our offices are based.

- **Pay Parity:** We take a systemic approach to pay parity to ensure it is fair irrespective of gender or race, including conducting formal reviews of compensation on a “like for like” job basis.
- **Training:** Our training in support of diversity spans the spectrum of anti-harassment and anti-bias training for employees, to driving retention and development through our leadership and management training programs.
- **Hiring:** We take several steps to enhance diversity through our hiring process including diverse interviewers and outreach to diverse candidate pools on all positions.
- **Accountability and transparency:** We began publishing our EEO-1 data for U.S. employees in 2019 and have now added similar data for our U.K. employee population.

EEO-1 Reports: [2018](#), [2019](#), [2020](#)

US Employees

	Officers	Executives	Management	Staff
Gender				
Female	25%	28%	30%	31%
Male	75%	72%	70%	69%
Race / Ethnicity				
Black	3%	4%	5%	8%
Hispanic or Latino	3%	3%	4%	6%
Asian	12%	23%	32%	34%
White	82%	69%	57%	50%
Other	0%	1%	2%	2%

UK Employees

	Officers	Executives	Management	Staff
Gender				
Female	20%	30%	27%	29%
Male	80%	70%	73%	71%
Race / Ethnicity				
Black	0%	5%	4%	7%
Hispanic or Latino	N/A	N/A	N/A	N/A
Asian	10%	20%	21%	25%
White	90%	69%	69%	61%
Other	0%	6%	6%	7%

* Data as of September 1, 2021. To align with U.S. government reporting requirements, data uses the traditional gender categories of male and female.

** Our U.S. and U.K. based employees total approximately 80% of our total employee population.

Board of Directors

Our Board refreshment efforts continue to focus on diversity. In 2020, we added three new directors to our Board, two of whom are female. As of May 2021, our Board is 42% female and three of our directors self-identify as people of color.

Broader network

Our ability to help increase diversity through our broader network is a good example of our company purpose - using our data, technology and expertise to connect people to opportunity. Two ways we are focused on doing that are the NYSE Board Advisory Council and our Entrepreneur Bootcamps.

- NYSE Board Advisory Council - The council was established in 2019 to help companies increase diversity on their boards. A commonly cited challenge to board diversity is a lack of access to diverse candidate pools. Through the NYSE Board Advisory Council, we have created a pool of CEO-vetted, board-ready candidates for management teams to tap into. In 2020, we grew the pool by 79% and developed digital components on the platform to help nurture candidate-to-candidate networking opportunities, as well as enable board leaders to easily search candidates by criteria. We've received 295 requests to access that platform since 2019. [🔗](#)
- Entrepreneur Bootcamps - In 2020, we began working on a series of bootcamps that launched in early 2021 to support underserved communities, including black-owned businesses, with educational opportunities and resources for growing their companies. [🔗](#)

Total number of directors

12

Gender

Female 5

Male 7

Did not disclose 0

Race / Ethnicity

Black 2

Hispanic or Latino 0

Asian 1

White 8

Other 1

Did not disclose 0

Charitable giving

Financial Education

The goal of financial education is financial wellbeing for individuals and communities, regardless of background or resources. We support programs that provide resources to help build these skills with a focus on underserved communities.

NYSE Future Investors Program – We work with digital education provider Everfi to underwrite financial education programs in high schools and grade schools across Atlanta, Boston, Chicago, New York and the Bay Area in California. The curriculum was developed by learning experts and is delivered digitally with teacher training at no cost to the schools. Results for the 2020-2021 school year include:

- 4,669 students reached at 67 schools, with 63% of those schools in low-to moderate income communities
- 4,507 hours of learning contributing to a 42% increase in knowledge in high school students and 47% increase in knowledge in grade school students (based on assessments taken before and after course completion)
- For student populations where demographic data is available (i.e., for those 13 and older), 38% of those participating self-identified as Black / African American and 19% Hispanic / Latinx; 51% self-identified as female

Young Money – In the United Kingdom, we are working with a program called Young Money to help primary schools become Centres of Excellence in Financial Education. This designation includes teacher training and the creation of a detailed financial education curriculum integrated across classes. Our funds are underwriting six schools to achieve this certification. Two of the six schools we sponsor were awarded with Certifications of Financial Education Excellence in 2021:

- Rossett Acre Primary School
- Cheam Park Farm Academy

Junior Achievement – We support several Junior Achievement programs, including a national leadership summit and New York-based business plan competitions for high school students and financial literacy programs for middle school students in the greater Atlanta area.

- New York – Sponsorship of the 2020 Business Plan Competition with nearly 500 students from 16 schools taking part.
- Georgia – Sponsorship of four-week classroom curriculum covering financial literacy, business, entrepreneurship and career readiness and a full-day simulation exercise where students are assigned a job, income, education, and family scenarios so they can practice making decisions such as managing a household budget, using banking services and determining investment options. This program reached 2,000 students in metro Atlanta.
- National Student Leadership Summit - Sponsorship of the Best Financial Performance Award.

COVID-related giving

Additionally, given the high demands for assistance around the world in 2020, we took steps to support our communities including \$10 million in donations to COVID-related charities based in over 35 cities where we have offices. [🔗](#)

Employee charitable match

We match charitable contributions for all employees and increased our annual limit to \$3,500 in 2020.

- More than \$450,000 in employee donations were matched in 2020
- More than 400 employees took advantage of the match
- Nearly 1,000 donations were matched going to just under 500 charities

Governance

At the Board level, our directors are focused on ESG risks and opportunities at both the full board and on multiple committees.

Board refreshment

In continuation of our refreshment efforts, the Board of Directors added Caroline Silver, Shantella Cooper and Mark Mulhern to the Board of Directors in 2020. These three new directors enhance the skill sets of the Board by adding merger and acquisition, technology, risk, human resources and financial expertise while also further improving our diversity. [🔗](#)

Six out of twelve directors have a tenure of five years or less as of September 2021; these directors bring fresh perspectives that are balanced by the institutional knowledge of longer-tenured members of our Board.

Our three new directors completed a robust onboarding process that includes training on topics such as cybersecurity, compliance and ethics, risk management, human capital management and each area of our business.

Compensation

We continue to maintain a well-balanced and performance-based executive compensation program, including:

- More than 87% of named executive officer (NEO) targeted compensation delivered through variable, performance-based compensation programs
- More than 64% of NEO targeted compensation delivered through equity compensation programs
- Continued emphasis on shifting toward multi-year performance measures within equity compensation programs
- Annual cash bonus opportunity and performance stock units (PSUs) capped at 200% of the established target opportunity
- Mandatory and competitive stock ownership requirements
- A robust compensation clawback policy
- Anti-hedging and anti-pledging policy requirements
- Change in control protection that requires a “double-trigger” (i.e., there must be a change in control and a termination of the executive’s employment) for payment to be provided
- No “golden parachute” excise tax gross-up provisions in employment agreements with our NEOs
- ESG items including human capital management, diversity initiatives and sustainability issues are factors in determining the non-financial performance for our CEO and CFO

What's new?

New Board diversity disclosures [🔗](#)

Additional disclosures on political advocacy [🔗](#)

ESG KPIs for CEO and CFO [🔗](#)

COVID oversight

Since the beginning of the COVID-19 pandemic, our directors have overseen the company's response to COVID-19 and received periodic reports from our senior management team.

Advocacy

Consistent with a growing focus on political accountability and transparency, we increased the reporting on our website to include all trade associations to which we pay \$25,000 or more in annual dues.

We continue to prohibit the use of corporate funds to make contributions to any candidates, political committees or other entities organized primarily for political activities under section 527 of the Internal Revenue Code or under 501(c)(4) of the Internal Revenue Code, or to any political party that would use the money to support any candidates. Our policies also prohibit direct independent expenditures as defined by the Federal Election Commission.

Our Board of Directors has oversight of the company's policies related to political and campaign contributions and other political expenditures with explicit authority in the Nominating and Corporate Governance Committee charter.

Risk management**Strategy & Oversight**

Our Board of Directors is responsible for overseeing ICE's risk management process, which includes management of general operational risks, as well as particular 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 governance guidelines.

We have an Enterprise Risk Management team, led by the Corporate Risk Officer. The team includes regional Risk Officers that oversee each business unit.

We employ a three-lines model to enterprise risk management, a concept endorsed by the Institute of Internal Auditors. This framework helps ensure strong redundancies and preparation.

- The first line is comprised of management and is responsible for the day-to-day operation of the business and the associated risks.
- The second line serves an oversight and challenge function from a risk perspective and includes our Enterprise Risk Management, Legal & Compliance, Financial Controls, Human Resources and Information Security Assurance teams.
- Internal Audit is the third line and serves to provide an independent check and additional assurances that risks are anticipated and mitigated.

Cybersecurity and Data Protection

ICE ensures both the physical and digital security of our markets, clearing houses and data through industry-leading security technology and processes. 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.

- Detailed cybersecurity policies are reviewed at least annually.
- Employees are required to complete security awareness training upon hire and annually thereafter; training modules require employees to read and provide acknowledgement of the Corporate Information Security Policy.
- Dedicated Cybersecurity team is led by Chief Information Security Officer.
- Board oversight is led by the Risk Committee with at least quarterly security briefings from senior management.
- Information security is considered a core skillset and is part of every employee's annual performance review.
- Reporting a security concern can be done easily from our website [here](#).
- Information Security Assurance regularly conduct tests utilizing various methods to verify compliance with written policies and to assess vulnerabilities. In addition, ICE teams are subject to examinations from Internal Audit and multiple regulatory bodies.
- Service Organization Control (SOC) audits are performed annually to produce independent verification and testing of ICE controls for external parties and auditors that rely on ICE. The scope of these reports is evaluated each year and tailored in response to customer feedback and business developments. These reports are available to any customer via the [TPRM Portal](#).

Business Continuity

Our crisis management team handles our end-to-end response to any potential issues and regularly conducts global drills to ensure our processes are ready to be implemented. All mission-critical functions are tested for responsiveness and business continuity. Following each acquisition of a new company, this process is reviewed to ensure crisis management procedures are in place across our entire organization.

Employees are trained annually on our business continuity procedures to ensure readiness and understanding.

SASB

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

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

Learn more

ice.com/security 

ice.com/data-protection 

Ethics & Compliance

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

Our compliance policies are approved by the Board's Nominating and Corporate Governance Committee and reviewed regularly and assessed for effectiveness. All employees globally, including contractors, are trained, tested and must attest that they have read and understand the policies upon hire and annually thereafter. Test scores are assessed to ensure understanding. Any breach of our policies is investigated and appropriate actions are taken which may include termination of employment.

Procedures are in place requiring that gifts, meals and entertainment given to or received from a business partner or government official above certain thresholds must be reported to and approved by the compliance department.

We have a Protected Disclosure Hotline (formerly known as the Whistleblower Hotline) which can be accessed easily through both external and internal resources. We use EthicsPoint as our third-party service provider. Inquiries can be made anonymously subject to the laws of the country the employee is based in. Every inquiry is fully investigated and actions are taken as appropriate.

ethicspoint.com / (866) 294 4493

SASB

Number of significant market disruptions and duration of downtime
FN-EX-550a.

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

Policies

Code of Business Conduct

Personal Trading Policy

Anti-Bribery Policy

Reporting and Anti-Fraud Policy

Anti-Money Laundering and Sanctions Policy

Business Gifts, Meals and Entertainment Policy

Conclusion

Thank you for your interest in our ESG data and approach to sustainability. We will continue providing updates throughout the year on our website and encourage you to contact us with any questions at ESG@ice.com.

Disclaimer and Forward-Looking Statements

The information and opinions contained in this report are provided as of the date of this report and are subject to change without notice. Intercontinental Exchange, Inc. ("ICE") does not undertake to update or revise any such statements. This report represents current ICE policy and intent and is not intended to create legal rights or obligations. This report may contain or incorporate by reference public information not separately reviewed, approved, or endorsed by ICE and no representation, warranty, or undertaking is made by ICE as to the accuracy, reasonableness, or completeness of such information. Inclusion of information in this report is not an indication that the subject or information is material to ICE's business or operating results.

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