



SASB Metrics Security & Commodity Exchanges

Table 1. Sustainability Disclosure Topics & Accounting Metrics

Code	Metric	2020 Performance		
Promoting 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	Halt	Number News event trading halts: NYSE: 234 NYSE American: 42 NYSE Arca: 8	Duration 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: 3,895* NYSE Arca: 729* NYSE American: 456*	LULD halts are 5 minutes long.
*A significant percentage of these occurred in the volatile period between March 1 and June 1 of 2020.				
FN-EX-410a.2	Percentage of trades generated from automated trading systems	<p>We operate securities and futures exchanges.</p> <p>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.</p> <p>In our futures exchanges, the requirement to identify usage of an automated trading system varies by jurisdiction. Based on the definition of an ATS and the level of required disclosure in the jurisdiction where each exchange operates, approximately 44% of the trades executed across our five futures exchanges are identified as having been generated from an automated trading system. However, the percentage of trades generated by any version of an automated trading system varies greatly by asset class and can range from 10% to 80% in any given product / instrument.</p>		

	<p>Note to FN-EX-410a.2 – The entity shall discuss risks and opportunities (short- and long-term) associated with automated trading systems including algorithmic or high-frequency trading.</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>
<p>FN-EX-410a.3</p>	<p>Description of alert policy regarding timing and nature of public release of information</p>	<p>The NYSE Timely Alert procedures⁽¹⁾ for listed companies apply between the hours of 7:00 am ET and 4:00 pm 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:</p> <ol style="list-style-type: none"> 1. Between the hours of 7:00 am and 4:00 pm ⁽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. <p>Footnotes: (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;</p>

		<p>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.</p> <p>(2) The full text of Regulation FD is available at https://www.sec.gov/rules/final/33-7881.htm.</p> <p>(3) NYSE Regulation will only implement news pending trading halts upon a company's request between the hours of 7:00am ET and 9:30am ET.</p> <p>Additional details can be found in Section 202.05, 202.06, and 202.07 of the NYSE Listed Company Manual</p>
FN-EX-410a.4	Description of policy to encourage or require listed companies to publicly disclose environmental, social, and governance (ESG) information	<p>The NYSE provides resources and tools to encourage and help issuers determine the best path to ESG disclosure for their companies, including reporting guidance, working groups, webinars and a library of content.</p> <p>NYSE ESG Resource Center</p>

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

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 and (2) duration of downtime	(1) Number of significant market disruptions - none (2) duration of downtime - NA
FN-EX-550a.2	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	(1) Number of data breaches - None (2) percentage involving personally identifiable information (PII) - NA (3) number of customers affected - NA
FN-EX-550a.3	Description of efforts to prevent technology errors, security breaches, and market disruptions	<p>ICE has policies and procedures designed to ensure the physical and digital security of its markets, clearing houses, and data through industry-leading security technology and processes. ICE's Information Security Department consists of diverse and skilled teams that work to protect confidential data from unauthorized access, misuse, disclosure, destruction, modification, or disruption. In addition, ICE has tools in place designed to detect and mitigate technology issues and minimize the impact on markets and other services.</p> <p>Policies ICE maintains detailed information security policies. Employees are required to complete security awareness training upon hire and annually thereafter. The security awareness training modules require employees to read and provide acknowledgement of the Corporate Information Security Policy. The policies are for official use only and are reviewed at least quarterly by ICE Senior Management.</p> <p>ICE also maintains policies, standards, procedures, and other documentation regarding its software development, quality assurance testing, and capacity planning, all of which contribute to the prevention of technology errors.</p> <p>Application Security ICE employs a dedicated Application Security team which defines and enforces mandatory best-practice secure software development. The Application Security team maintains a policy which details these practices and works closely with ICE Development teams.</p> <p>Incident Management ICE Operations maintains an Incident Management program to handle any incident with operational impact - security or otherwise. The goal of the Incident Management program is to provide a cohesive framework for the communication, resolution, and recording of incidents and to ensure incidents are resolved in a planned and controlled manner so that any interruption is resolved quickly and</p>

service is restored. With regard to Information Security incidents, it is ICE policy to notify customers of any confirmed material breaches of customer data.

System Resiliency and Business Continuity Planning / Disaster Recovery

System resiliency is a core tenant of the ICE system design process and redundancies are purpose-built into ICE’s applications, network infrastructure, and across primary and backup data centers. Such design resiliency may include “Hot/Hot” system components with real-time failure capabilities, readily available back-up components, robust recovery and/or failover procedures, and geographically-diverse backup data centers.

The geographically-diverse “like for like” Disaster Recovery data centers are maintained and governed by an enterprise wide policy. Per policy, all ICE core procedures, systems and operational tasks are: duplicable in recovery facilities, exercised at least annually, documented comprehensively.

Insurance

We maintain insurance coverage that may, subject to the terms and conditions of the policy and payment of significant deductibles, cover certain aspects of cybersecurity issues.

Testing and Audit

ICE Internal Audit and Information Security Assurance regularly conduct tests utilizing various methods to verify compliance with written policies and procedures, to assess potential vulnerabilities, weaknesses, and/or control gaps within said documentation and processes. In addition, ICE teams support examinations from multiple regulatory bodies, and commission independent information security penetration tests.

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 are evaluated each year and tailored in response to customer feedback and business developments. These reports are available to any customer via: <https://www.theice.com/tprm-portal>. Questions about the reports or this process, can be directed to ICE-ThirdPartyDueDiligence@theice.com.

Table 2. Activity Metrics

Code	Metric	Performance
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 and daily volumes here .

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 and daily volumes here .
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NOTES

- This report does not include operations associated with Ellie Mae, which ICE acquired in September of 2020.