



2023

Sustainability Report

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Letter from Chair + CEO

In the nine years since we began publishing this annual sustainability report, the discourse around sustainability has matured and evolved, and more recently, become a topic of active public debate. The ongoing discussion is forcing companies to closely examine and clarify what sustainability means to them.

At ICE, years of consistent conversations with our stakeholders, as well as among our colleagues and our Board, has helped us clarify what sustainability means for us.

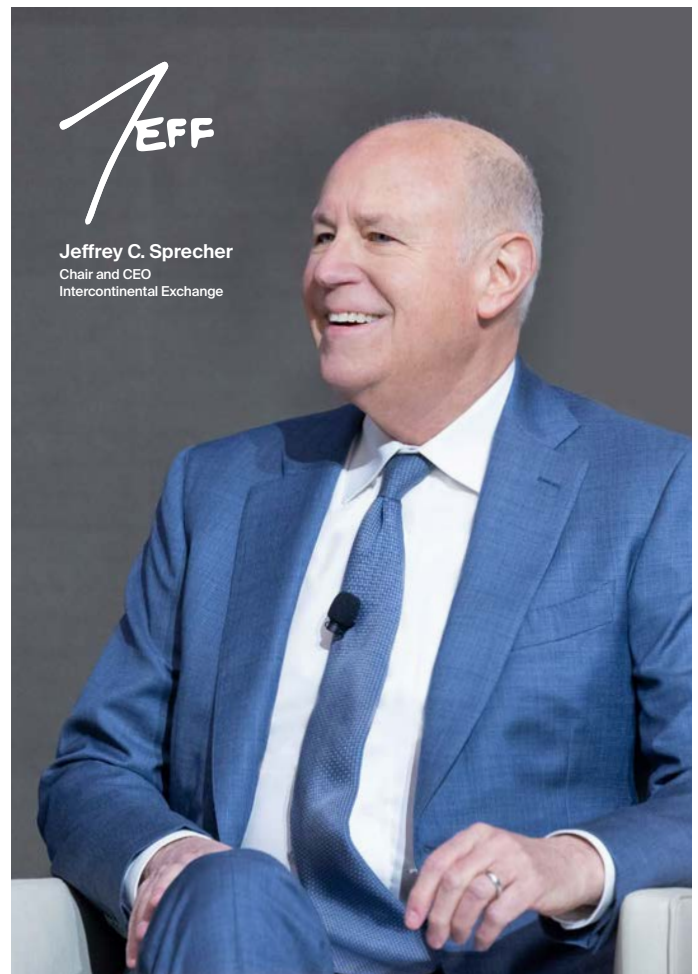
The topics you will see discussed in this report are ones that we have deemed through careful consideration and input to be relevant for our business. As such, we treat them like any other part of our business strategy. Some issues, such as cybersecurity or ethical behavior, were foundational for our company long before anyone was calling them sustainability. Others, such as efforts to reduce our operational emissions footprint, are newer issues to us that we are refining our approach to each year.

This report largely focuses on our operations – our people, our impact on the climate and how we manage risks to our business. However, that is only part of our approach to sustainability, as we are positioned to have an additional impact through our products and services:

- Price discovery delivered by our exchanges across all forms of energy is instrumental as the economy navigates the energy transition.
- As early investors in environmental trading products, with the acquisition of the Climate Exchange in 2010, we have facilitated the development of a robust secondary market in emissions trading and renewable energy, both critical pieces of global efforts to meet emission reduction targets.
- More recently, we have invested in building our capabilities in providing sustainable finance data, including innovative property-level climate products that are the result of bringing together our data and our mortgage businesses.
- At the NYSE, we bring together sustainability leaders from among our community of over 2,000 listed companies to help those companies at the early stages of their sustainability efforts to develop and advance their goals.

As the conversations around what sustainability is or should be evolve, I look forward to continuing to engage with our stakeholders to keep a firm pulse on what it means for our company and how we can best address the associated risks and opportunities.

Thank you for your interest in this report.



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.

- **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 those venues.
- **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.

What we do

ICE's digital networks combine data, technology and expertise to bring transparency, efficiency and standardization to markets.

Why we do it

Our purpose is to design, build and operate digital networks to connect people to opportunity.

How we do it

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.

Transforming what's possible

We were the first to digitize exchanges, and continue to be a leader on price discovery, capital raising, indexing and more.

EXCHANGES 

Streamlining the system

Extensive, high quality and marketleading data. Our end-to-end solutions help deliver the insights that drive decision-making.

FIXED INCOME & DATA SERVICES 

Automating the industry

We're digitizing the entire mortgage process to reduce costs and increase efficiencies.

MORTGAGE TECHNOLOGY 

2023 financial metrics

Net revenues ¹	+10% y/y	Adjusted diluted EPS ²	+6% y/y	Adjusted free cash flow ²	+10% y/y
\$8.0B		\$5.62		\$3.2B	

¹ Net of transaction-based expenses.

² Adjusted figures represent non-GAAP measures. Please refer to ICE's 2023 Form 10-K filed on February 8, 2024, and our earnings supplement for reconciliations to the equivalent GAAP measures.

About this report

This report is our ninth 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 2023.

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)
- UN Sustainable Development Goals (SDGs)

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. For purposes of this report, Black Knight is not included unless noted otherwise. We plan to integrate our reporting from 2024 forward.

Scope

This report covers:

- How we approach management and oversight of sustainability
- Progress made in 2023
- 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 analysis with the most potential for risks and opportunities:

- **Human capital** – our people are our greatest asset and fostering a diverse, engaged work-force 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 and opportunities** – we are addressing our impact on the climate, the climate's impact on our business and our 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](#)
- [Information Security overview](#)
- [ICE Trust Center](#)
- [Data Privacy](#)
- [Code of Conduct and compliance policies](#)
- [Modern Slavery Act statement](#)

Approach to sustainability

Our governance and management approach to sustainability continues to be based on strong board oversight and a strategy that is integrated throughout our operations and driven by the teams with the subject matter expertise.

Board of directors

Our directors are focused on managing sustainability risks and opportunities at both the full Board level and on multiple Board committees. At the committee level, the Nominating and Corporate Governance Committee is charged with reviewing and assessing the company’s environmental, social and governance initiatives and making recommendations to the company to further its sustainability goals ([NCGC Charter](#)). The committee reviews sustainability matters at two or more meetings each year. In addition to the mandate of the Nominating and Corporate Governance Committee, important aspects of managing these risks and opportunities are a focus for the following committees:

- **Risk Committee** – cybersecurity and climate related risks.
- **Compensation Committee** – human capital management issues, including diversity and pay parity.

Each committee briefs the full Board on topics addressed at the committee level and the full Board further discusses as needed.

Management

Our overall 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 from across the company, 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. Our Vice President of 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. Simply put, 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 analysis every few years. Following our acquisition of Black Knight in September of 2023, we plan to conduct a formal refresh of our sustainability materiality analysis in 2024.

In between formal exercises we are in constant dialogue with our stakeholders to ensure we understand what they view as our largest sustainability risks and opportunities. As referenced in the previous section, this report is focused on the areas deemed to be most relevant for our business and stakeholders based on this ongoing analysis:

- Human capital management
- Risk management
- Environmental risks and opportunities

Engagement channels

Stakeholder group	Engagement channels
Employees	<ul style="list-style-type: none"> ■ Annual performance reviews and ongoing feedback channels ■ Complaint reporting hotline (i.e. whistle-blower hotline) ■ Intranet, email, instant messaging platforms ■ Meetings, social and volunteer activities ■ Surveys ■ Town halls
Investors	<ul style="list-style-type: none"> ■ Analyst meetings ■ Annual general meeting of stockholders ■ Investor conferences ■ Quarterly earnings calls ■ Shareholder outreach
Customers	<ul style="list-style-type: none"> ■ Events ■ Meetings ■ Podcasts ■ Surveys ■ Webinars
Vendors	<ul style="list-style-type: none"> ■ Annual vendor reviews ■ Onboarding assessments
Regulators	<ul style="list-style-type: none"> ■ Comment letters ■ Hearings ■ Participation on advisory committees
Communities	<ul style="list-style-type: none"> ■ Charitable giving ■ Volunteer activities

Updates and new developments

Our efforts in 2023 were in many ways a continuation of ongoing work. Specific new developments and areas of focus included:

Black Knight integration

The integration of Black Knight, an acquisition we completed in September of 2023, is well underway across the company, including as it relates to how we manage, oversee and report on sustainability. We expect our sustainability reporting to cover the combined entity starting with our 2024 report published in 2025.

Supply chain / Scope 3

As stated in last year's report, a focus item for us in 2023 was putting in place a robust system to engage, manage and reduce our supply chain emissions. Our progress on this effort and additional discussion on the topic can be found in the environmental risks & opportunities section of this report.

Human capital management

One of the ways we measure employee engagement and monitor how we are doing with regard to employee attraction and retention is through our biennial employee survey, which we conducted at the end of 2022. While those survey results were overwhelmingly positive, we use the areas where we scored the lowest to form the basis for a set of action items that are agreed to by the senior management team and assigned accordingly. The human capital management section of this report includes additional detail on those action items.

Sustainable products

Our robust offering of sustainability-related products is outlined in the TCFD index located in the appendix of this report and covers products including tradable instruments, data and analytics and engagement with our community of NYSE-listed companies. New sustainable products launched in 2023 include:

- **ICE Commodity Traceability** – service in development to enable traders and operators to validate and demonstrate that their supply chains meet the requirements of the E.U. Deforestation Regulation that enters into application in 2025.
- **ICE Carbon Reference Entity Data Service** – a reference data service to provide standardized, aggregated and validated data to the carbon credit market.
- **CORSIA carbon credit futures** – physically-delivered futures contracts for credits considered eligible for CORSIA, a global market-based carbon credit program targeted at reducing emissions from international aviation.



Areas of focus



Human capital management

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. In this section of the report, we aim to provide context on how we measure, assess and manage employee engagement and influence company culture.

Employee population

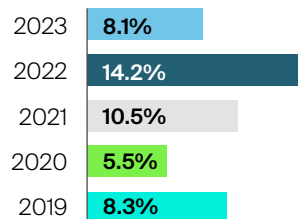
The acquisition of Black Knight in September of 2023 brought our employee population to 13,222 as of December 31, 2023, across more than 70 offices in 21 countries.

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, immediately following the acquisition of Black Knight in September of 2023, two units of the company were divested resulting in a net increase in headcount of approximately 4,000 employees at ICE, for a total of 13,222 employees at the end of the year as noted above. Approximately 2,000 additional Black Knight employees transitioned with the divested companies to new employers.

As it relates to onboarding employees from M&A activity, our 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, familiarization with our culture, understanding our policies and making meaningful connections.

Voluntary attrition

We consider voluntary attrition to be an important measure of workforce retention and have been disclosing it in this report for the past five 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 the last quarter of 2022 and throughout 2023, we saw a return to our pre-COVID levels, which continue to be better than comparable data in the finance and technology sectors we use as benchmarks.



Includes all full-time employees across our global locations, excluding Black Knight.

Culture and values

How we think about culture at ICE

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 matches the culture we aim to build.
- **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.

Employee surveys

As noted above, our employee survey is one way we measure how well our core values are reflected in our culture and how we can strengthen them.

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.

2022 Recap

Our most recent companywide survey was conducted in November of 2022, and the results were published in our 2022 Sustainability Report. 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.

ICE Core Values

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.

Following each survey, after analyzing results, particularly areas where we scored the lowest, a set of initial 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.

The main action items coming out of the 2022 survey focused on:

- **Internal communications** – including corporate communications, communications between managers and their teams, and communications between teams or different business lines and functions.
- **Employee development** – including availability of programs and career-building resources.

Steps we took to address these areas fell into the following categories and included these actions, among others:

Employee survey action items	
Categories	Sample of actions taken in response
Enhanced employee communications at a corporate, team, manager and individual level	<ul style="list-style-type: none"> Increased employee social events and volunteer activities Held more business unit and location-specific town halls Refined communications style to better focus on critical information Refreshed intranet homepage format to provide more timely updates Conducted training workshops on communications Provided people managers with new resources for giving and receiving feedback and holding difficult conversations
Updated learning technology to provide better career development content and user experience	<ul style="list-style-type: none"> Upgraded online learning catalog of courses and underlying technology Updated learning and development resources on company intranet
Significantly increased internal marketing / awareness around learning and development resources	<ul style="list-style-type: none"> Launched new learning and development monthly newsletter for employees Conducted additional internal marketing for learning and development programs Increased engagement with direct managers of program participants to educate and encourage management support and feedback
Expanded reach of employee development programs and content refinements to better meet needs of the business and employees	<ul style="list-style-type: none"> Added new resources for people managers Created new mentorship resources Updated and expanded new hire training to provide a more comprehensive overview of business and company culture More than tripled training workshops available to individual contributors from previous year Added multiple duplicate sessions and alternate learning options to new leader training to reach a broader global audience Customized and branded online training playlists by function and business line Launched new one-on-one training initiative to uncover knowledge gaps Launched new training series focusing on IT tools

We will conduct our next biennial companywide survey in 2024 and plan to discuss the results of our 2024 survey in our sustainability report next year.

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.

Career development

Strategy

Recognizing the importance of career development and learning opportunities for employee engagement, attraction and retention, we have invested over the past several years in new and enhanced programs that reach all employees. As noted in our 2022 sustainability report, the importance of concurrently building strong internal awareness around what’s available is paramount – great learning and development resources are only valuable if the people that need them know they are there.

Accordingly, 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. Some of the steps we employed to raise awareness are highlighted in the previous section of this report.

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.

Our training includes a mix of courses that are mandatory for all or some employees as well as several programs that are available by nomination or by opt-in.

Programs

Our programming generally falls into two categories including resources to:

- Develop people management, communication and leadership skills
- Learn more about ICE and our businesses

A detailed list of programs in both categories is available on our website [here](#). Additional enhancements made to our employee learning and development programs in 2023 are summarized in the previous section of this report.

Following the September 2023 acquisition of Black Knight we are focused on integrating learning and development programs across both companies.

Metrics

We endeavor to measure as much as possible and estimate training per full-time employee in 2023 to average approximately 12 hours per employee.

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

Note: includes all full-time employees across our global locations, excluding Black Knight.

Diversity

We are focused on increasing and supporting diversity through three pillars:

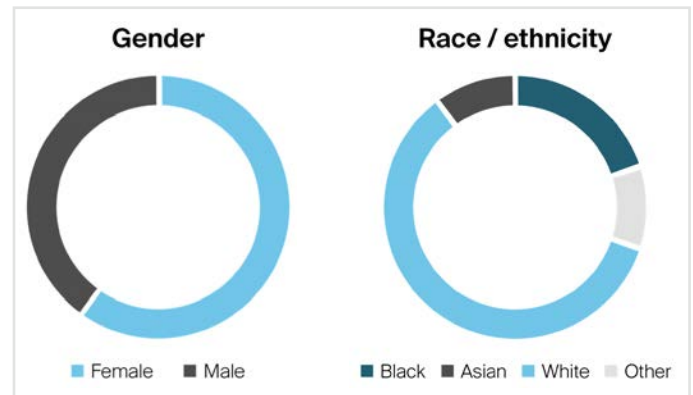
- Board of directors
- Employee population
- Across companies in our network

Board of directors

We believe that ICE benefits from having directors with diverse viewpoints, backgrounds, experiences, skill sets and other demographics. The Nominating and Corporate Governance Committee seeks to create a Board of Directors that consists of a diverse group of qualified individuals that function effectively as a group. Diversity is one factor in consideration of potential and incumbent directors. The committee considers a number of demographics including, but not limited to, race, gender, ethnicity, culture and nationality in seeking to develop a Board that, as a whole, reflects diverse viewpoints, backgrounds, skills, experiences and expertise.

Board

Efforts to refresh and diversify our Board in recent years have resulted in a Board of 10 directors that is 60% female and 30% persons of color as of May 17, 2024.



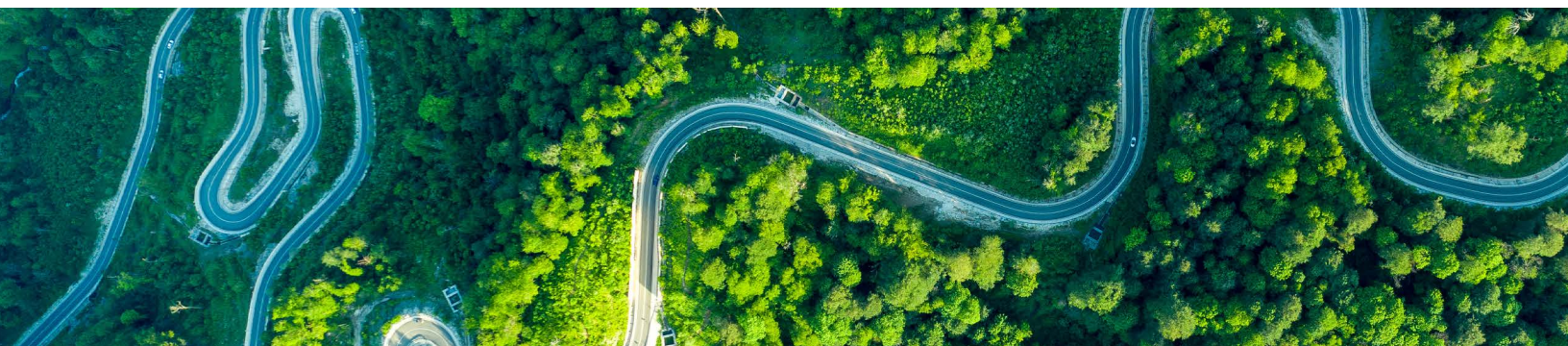
As of May 17, 2024

Employees

Transparency

We hold ourselves accountable and provide transparency on our progress on diversity by publishing diversity metrics annually, including our annual EEO-1 data.

EEO-1					
2018	2019	2020	2021	2022	2023



In addition to publishing our EEO-1 submissions, we provide the data using categories more closely aligned to our employee population broken out by gender and race / ethnicity for the U.S. and U.K. populations.

Global officers	
Female	27%
Male	73%

U.S. employees				
	Officers	Executives	Management	Staff
Female	28%	24%	30%	32%
Male	72%	76%	70%	68%

Black	5%	4%	4%	9%
Hispanic or latino	2%	2%	3%	5%
Asian	16%	23%	38%	33%
White	76%	67%	51%	47%
All other	1%	4%	4%	5%

U.K. employees				
	Officers	Executives	Management	Staff
Female	33%	23%	29%	33%
Male	67%	77%	71%	67%

Black	0%	3%	5%	6%
Hispanic or latino	N/A	N/A	N/A	N/A
Asian	0%	26%	30%	38%
White	89%	67%	60%	49%
All other	11%	4%	5%	7%

Notes: data as of January 1, 2024. Race / ethnicity categories and traditional gender categories of male and female 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 approximately 57% of our total employee population.

This data does not include employees associated with the acquisition of Black Knight.

Strategy

We think the hiring process is one of our best opportunities to increase diversity throughout our employee population and create a strong pipeline of diverse leaders moving up in the organization. We take several steps to enhance diversity through our hiring process, including:

- Working with organizations to attract a diverse pool of candidates for our job openings, including:
 - Wall Street Bound
 - Women's Bond Club
 - Women in Financial Markets
 - CareerSpring
 - City of Refuge
 - Out in Finance
- Providing hiring managers with training to help drive inclusive hiring practices.
- Creating a diverse slate of interviewers for candidates to interact with.
- Drafting inclusive job requirements that do not unnecessarily exclude qualified candidates.

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. Any anomalies discovered in our review are swiftly corrected.

Training

We foster an inclusive work environment that does not tolerate discrimination or harassment of any kind. 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.

Across community of companies we work with

In 2019, the NYSE's Board Services program launched to address the critical need for diverse, inclusive leadership on corporate boards and help identify board-ready candidates from underrepresented groups. This solutions-based approach is a resource to help public and private companies meet their market-driven board diversity needs.

The NYSE leverages its relationships with CEOs of some of the world's largest and most well-established companies. These CEOs participate by leveraging their own personal and professional networks to identify and recommend talented, diverse, board-ready candidates. NYSE invites the nominated candidates to upload their biographies to The NYSE Board Candidate Network and offers training and other programs to help candidates prepare for board service.

In addition to educational and networking opportunities for the board candidates, the program hosts a series of live events designed to connect diverse candidates to NYSE-listed companies seeking to refresh their boards.

The program's efforts have yielded a candidate pool of more than 700 and helped place more than 40 diverse candidates on corporate boards as of the end of 2023.

Employee benefits and wellness

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

Benefits

Our employees receive a competitive total rewards package in line with local benchmarks everywhere we operate around the world. 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.

Accommodations are 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.

Giving back

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. In addition to corporate giving directed by the company, 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 charitable efforts. Not only is it aligned to our business, we have a vested interest in creating 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](#).



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 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.

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.

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 and 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.

Sustainability risks are fully integrated into our broader risk management program and overseen by the enterprise risk management team. Further detail on how we measure, manage and mitigate climate risk in particular can be found in the TCFD report included in this document, and our CDP questionnaire, which is publicly available on the CDP's website.

System resiliency, business continuity planning, disaster recovery

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.

Cybersecurity and data protection

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.

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 the Chief Information Security Officer (CISO) and senior members of the enterprise risk management, or ERM, 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.
- **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 ERM framework. Our cybersecurity leadership team, in concert with our ERM 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 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, ERM, 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.
- 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.

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 upon hire and annually thereafter. 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 policies include:

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

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

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.





Environmental risks and opportunities

ICE is uniquely 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.

We approach our risks and opportunities with regard to climate in three ways:

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

Our products

Our opportunity to make a broader impact through sustainable finance products and markets extends across our business and includes environmental markets, sustainable finance data and supporting NYSE-listed companies in their sustainability reporting efforts.

- **Environmental markets** – climate 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. Today, our environmental markets span Europe and North America, the world’s most liquid environmental markets. Our range of products are integral to valuing externalities and balancing the world’s finite carbon budget to meet a 1.5°C pathway.

- **Sustainable finance data** – a sharper focus on sustainability means institutions and finance professionals are looking beyond traditional analysis to assess risks and opportunities, and are factoring environmental, social and governance issues into their decision-making. ICE offers a range of cross asset sustainable finance data and tools that provide a comprehensive view across the market to help uncover opportunities, manage risk and provide transparency.
- **NYSE** – we have dedicated resources to advise and support NYSE-listed companies as they work to increase and improve sustainability disclosures. These include educational opportunities, resources and working groups, as well as platforms for dialogue between issuers and investors.

A comprehensive break-down of our products and services is available in the TCFD section of this report.

Climate risk to our business

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

- **Physical** – which focuses on potential impacts to ICE’s operations or to our stakeholders resulting from acute weather events.
- **Transitional** – which centers around evolving impacts to demand for different products as the economy transitions towards net zero greenhouse gas emissions.

Our enterprise risk management team, overseen by the Board Risk Committee and led by our Corporate Risk Officer, has developed an approach based on the Task Force on Climate-Related Financial Disclosures framework to assess the range of impacts from climate-related risks to our businesses.

The team implements that framework in collaboration with leadership across our organization to identify, assess, and manage climate risks and opportunities. An assessment of those risks and opportunities, including consideration of climate-related scenario analysis, is available in the TCFD section of this report.

Our footprint

As it relates to how we address the impact of our operations on the climate, we continue to evolve our approach and strategy and have outlined it below.

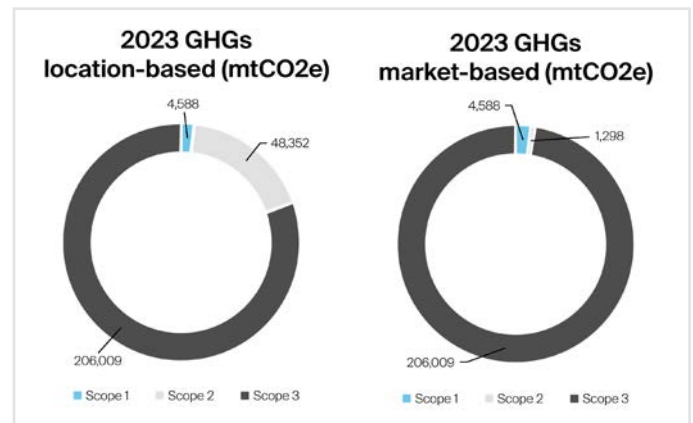
Greenhouse gas emissions calculations

This is our fourth year disclosing our greenhouse gas emissions and our third year including all relevant Scope 3 emissions. Our calculations are performed using the GHG Protocol and with assistance from a third-party firm with expertise in this area. A detailed table with our emissions broken out by scope and category can be found in the TCFD section of this report.

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.

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



Updates and observations

With our first two years of GHG calculations taking place for years 2020 and 2021, we now have a better picture of what our post-pandemic emissions profile looks like.

Additionally, following our acquisition of Black Knight in September 2023, we are working to update our calculations starting with our baseline year, 2021, to include the combined emissions for both ICE and Black Knight.



Goals

After establishing an emissions baseline for the year 2021, we were able to focus on setting carbon reduction targets in 2022. This effort resulted in a commitment to work toward the reduction of Scope 1 and 2 emissions by 50% by 2032 from a 2021 baseline, a target that we did not submit to the SBTi for approval, but established in alignment with the SBTi 1.5-degree methodology. In 2023, not accounting for Black Knight emissions, we made progress toward this target, reducing our Scope 1 and 2 market-based emissions from 6,808 tCO₂e in 2021 to 5,886 in 2023.

Given the material impact of the Black Knight acquisition on our emissions and uncertainty around market-based accounting protocols set by the GHG Protocol as well as potential changes to treatment of energy attribute credits, such as renewable energy certificates, by the SBTi, we are not continuing with our previously set Scope 1 and 2 targets so that we can reassess our new, combined footprint and determine the best strategy going forward.

Our commitment to working toward science-based emissions reductions is unchanged, and our efforts to decarbonize will continue, some of which are outlined in the following section. Whether that includes specific targets or particular frameworks will be determined in due course; however, we are confident that we will be able to continue to make progress in emissions reductions. We will continue to transparently report on our progress on an annual basis in future sustainability reports.

Actions

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 plan to explore.

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 2023 totaled 154,604 MWhs and include 147,989 RY2023 Green-e certified renewable energy certificates (RECs) for all electricity consumed in the U.S. and Canada. The remaining EAC purchases were matched based on the country where the electricity was consumed and compliance year.

We continue to explore additional renewable energy procurement methods as the market for clean energy evolves.

Scope 3

With 85% of our scope 3 emissions coming from purchased goods and services and capital expenditures, we focused in 2023 on building a robust system to engage, manage and reduce our supply chain emissions. That work has culminated in a strategy we expect to launch in 2024 to reach out to our suppliers and encourage those who are not yet reporting emissions or taking steps to decarbonize to do so. Our multi-year engagement plans include steps to help educate and support suppliers who are in the early stages of measuring and managing greenhouse gas emissions.

Carbon credits

In addition to matching our non-renewable electricity consumption with EACs, we purchase registered and certified carbon credits to match all Scope 1 emissions and steam-based Scope 2 emissions. We plan to provide additional details on those purchases in our CDP report.

Governance

Governance of our decarbonization efforts is similar to that of our broader approach to sustainability:

- Oversight from the Board and the Sustainability Governance Committee
- Work integrated throughout our operations companywide
- Reporting done on at least an annual basis, through this report, as well as reporting frameworks such as TCFD and CDP

Regulations

We are closely following, and preparing for, new regulatory requirements across the jurisdictions in which we operate, including climate disclosure requirements recently finalized by the U.S. Securities and Exchange Commission and State of California.

Additional detail on how we approach and manage climate risks and opportunities is available in the TCFD section of this report.



Data and reporting frameworks

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- 22** Sustainable Accounting Standards Board (SASB) metrics
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- 40** Employee data

Sustainable Accounting Standards Board (SASB) metrics

Metrics for 2023 are included for the Security & Commodity Exchanges and Software & IT Services sectors where relevant for our business. These metrics do not include Black Knight.

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: 350 American: 78 Arca: 29	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: 882 Arca: 123 American: 433	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 by a large degree 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.

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; Section 401 of the NYSE American Company Guide for NYSE American listed issuers; Rule 5.3-E(1)(2) of the NYSE Arca Company Guide for NYSE Arca listed issuers.

² The full text of Regulation FD is available at <https://www.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 Manual

Description of alert policy regarding timing and nature of public release of information

FN-EX-410a.3

The NYSE Timely Alert procedures¹ 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 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:

- 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.
- 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 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).
- 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 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.

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 Code of Business Conduct that applies to its employees, directors, consultants and contractors. The 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 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 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.

H5 Description of efforts to prevent technology errors, security breaches, and market disruptions

FN-EX-550a.3

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.

Cybersecurity

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.

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 the Chief Information Security Officer (CISO) and senior members of the enterprise risk management, or ERM, 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.

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 ERM framework. Our cybersecurity leadership team, in concert with our ERM 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 Chief Information Security Officer, or 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, ERM, 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.

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.

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

We focus our energy management program on our two data centers, where we can make the most material difference. Our 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 to minimize outside air infiltration and reduce solar heat gains. This lowers the thermal losses of the building which delivers a more efficient cooling profile and reduces the energy demand.

A 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 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
- ISO 50001

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

None.

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

8% of our employees are on a visa

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 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 diversity 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

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: <https://ir.theice.com/investor-resources/supplemental-information/default.aspx> and daily volumes here: <https://www.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: <https://www.theice.com/marketdata/reports/176>.



Task force on climate-related financial disclosures report

Governance

Board's oversight of climate-related risks and opportunities

Our Board of Directors (the Board), comprised of both independent directors and company leadership, 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 climate-related risk management. Subsidiary level boards of directors and their risk committees lend additional guidance and oversight to the risk management programs of our businesses.

Oversight of sustainability matters is also included in the mandate of the Nominating and Corporate Governance Committee, which is charged with assessing the company's sustainability initiatives and making strategic recommendations to enable ICE to further our sustainability-related goals.

Management's role in assessing/managing climate risks and opportunities

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 climate-related risks to our businesses.

Our overall 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 from across the company, 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

ICE's collaborative nature is distinctly embodied in our sustainability approach. Our Vice President of Sustainability coordinates these efforts and oversees our disclosures and strategy. In addition to formal governance structures, multiple operational departments work together to play a critical role in our sustainability strategies. Along with the company's risk team, human resources, operations, facilities, finance and business continuity teams work together to reinforce a culture of corporate preparedness and planning. Specifically, our facilities teams are engaged in efforts to account for and reduce our greenhouse gas emissions across the organization. Our business continuity and disaster recovery teams use an all-hazards approach to assess the physical security and resiliency of our facilities and systems to ensure the safety of our employees and meet the needs of our stakeholders and customers. The business continuity team conducts annual facility risk assessments for each office to identify the likelihood and impact of the loss of staff, facility, systems, and suppliers, as well as any mitigation measures in place. These assessments help ensure that the impact is kept to a minimum, whether the incident is of natural, human-caused, or technical origin.

Since our founding, ICE has brought innovation, transparency and efficiency to the markets we serve.

Centered at the nexus of leading global financial markets, ICE is distinctively positioned to support our stakeholders and communities in navigating rapidly changing and increasingly complex sustainability considerations.

As a company, we have engaged all facets of our organization to embrace the moment by exercising the ethos ICE has always applied in solving important challenges including: communication, collaboration and problem solving.

Strategy

Climate-related risks and opportunities

At ICE, we continue to enhance our strategies to manage climate-related risks and opportunities and have leveraged the TCFD framework to inform our overall strategic approach. Climate-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 towards net zero greenhouse gas emissions; and
- **Physical** – which focuses on potential impacts to ICE's operations or to our stakeholders resulting from acute weather events.

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. As sustainability is increasingly becoming a component of investment portfolios, our technology and data expertise position us to deliver solutions that meet these evolving customer needs.

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 real-world demand for fossil fuels declines, 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 customer's 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, 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 greater future uncertainty.

In developing our climate-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.

To further inform our strategic response to risk presented by climate considerations, in 2023, the enterprise risk management team leveraged ICE's own Geo-Analyzer visualization and analytics solution to risk-rate ICE's key physical sites and locations across the United States. The majority of ICE locations in the United States reside in lower-rated physical climate risk environments when factoring in various attributes of climate risk including the potential for hurricanes, floods, and wildfires.¹ ICE is also geographically dispersed, which assists in mitigating risk where we have high employee concentration.

Investment in climate change risk solutions

We started investing in environmental markets in 2003 through a partnership with the Climate Exchange, which we fully acquired in 2010. Innovative DNA has been embedded throughout ICE as it has grown and evolved. Now, with over a decade of investment in our products, ICE is recognized as a global leader in environmental markets. We continue to invest heavily in natural capital market solutions to offer climate change risk management options to our stakeholders.

Our commodity markets also play a leading role in facilitating the pathway to a net zero economy. In the same way that transparent price signals help balance supply and demand factors, ICE's environmental markets also provide transparency around pricing across the carbon cycle to balance the supply and demand of the world's carbon budget. Reference **Appendix A** for a sample of our environmental trading solutions.

While ICE's environmental markets fulfill an array of our customers' needs, they do not work in isolation. Our environmental markets complement our vast energy market portfolio and allow for participants to make informed decisions regarding utilization of competing energy sources within a broader economic context. By valuing both negative and positive externalities, our markets promote the erosion of the green premium, the additional cost of generating energy from less carbon-intensive technologies. The best practical example of this is in the electricity generation sector in Europe, where attributing a cost to the negative externality of pollution has incentivized a transition to more sustainable energy sources by making carbon intensive fuels relatively more expensive.

In addition to our market-based solutions, we have prioritized bringing transparency and data-driven insights into sustainability climate analytics and reference data as a core part of our overall strategy. There is growing demand for data related to sustainability factors for public and private companies, fixed income securities (e.g., corporate bonds, municipal securities, sovereign debt, securitized products), and benchmarks. We continue to invest in developing products that meet this demand with leading data solutions. Reference **Appendix B** for a sample of our sustainable finance data offerings.

We additionally have dedicated resources to advise and support NYSE-listed companies as they work to increase and improve sustainability disclosures. These offerings are outlined in **Appendix C**.

Impact of climate-related risks and opportunities, 10-K risk disclosure

To complement the work we have done across the organization in addressing climate-related risks, we have included a discussion regarding climate change risk as a unique and distinct risk factor in ICE's 2023 10-K Risk Disclosure. We will continue to advance the principles of transparent governance and other best practices as we evolve our thinking around climate risk. The pertinent extract from our 10-K is included at **Appendix D** for reference.

ICE's strategy, taking into consideration climate-related scenarios

Resiliency

We are well positioned to play an important role in facilitating the orderly and efficient energy transition to a net zero economy. Such efforts would be achieved through the critical risk management and price discovery tools offered by our global futures exchanges and clearing houses, along with the transparency brought by on-exchange trading, innovative data, analytics and digital solutions, and the decades of experience we have operating regulated businesses globally. ICE also 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 the physical risks associated with climate change 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.

¹ICE evaluated 16 office and data center physical locations identified by management as important corporate sites across the United States. 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 climate 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." Fifteen of 16 ICE locations analyzed received a Total Risk Score of less than 3, and 13 of 16 locations received a score of less than 2.

Scenario selection

We consider extreme but plausible scenarios as part of our approach to climate change 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), published May 2021. 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.

Scenario analysis and ICE strategy

ICE recognizes its commitment to remain 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, as supported by NZE, 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. Energy consumption is expected to double over the next 30 years, yet carbon emissions are expected to decline by half. This imbalance 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, including natural gas and environmental products, made up over 40% of ICE energy product revenues, growing 17% on average over the past five years.

ICE 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. Leveraging our leading environmental markets, we built a suite of carbon indices, which allow global investors to access market-based carbon prices through a single investment instrument. And today, there are a growing number of ETF providers benchmarking to our carbon indices and environmental markets.

Risk management

Process for identifying and assessing climate risks

ICE has adopted the Institute of Internal Auditor's Three Lines Model ("the 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 collaborates 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 risks presented by a changing climate 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 climate-related risks 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 climate change risk management approach and to evaluate enterprise-wide risks and opportunities related to climate change.

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

Organizations process for managing climate 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 climate risks

Climate 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 climate-focused risks most pertinent to its own strategy and operations to continue to safeguard ICE's position as an all-weather company.

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 climate-related risks including energy consumption, waste management, business travel, our supply chain and our investments.

Data centers

Our data centers account for a large portion of our electricity consumption and have implemented industry leading techniques to improve energy efficiency, reduce waste and offset operating emissions. The building structures provide a high level of insulation to minimize outside air infiltration and reduce solar heat gains. This lowers the thermal losses of the building which delivers a more efficient cooling profile and reduces the 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 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
- ISO 50001

Greenhouse gas emissions

This is our fourth year calculating and disclosing our greenhouse gas emissions in line with the GHG Protocol and our third year including all relevant categories of Scope 3. The metrics included below and discussed in this report do not include the operations of Black Knight, an acquisition we completed on September 5, 2023. We are in the process resetting our baseline and adjusting our emissions reductions strategy accordingly.

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.



Greenhouse gas emissions (mtCO₂e)

Metrics	Activity	2021	2022	2023
Scope 1	Fuel use (stationary)	1,010	859	877
	Fuel use (mobile)	2,389	3,567	3,205
	Refrigerants	1,854	207	506
Total Scope 1		5,253	4,633	4,588
Scope 2	Electricity	51,154	47,344	47,054
	Steam	1,555	1,518	1,298
Total Scope 2 (location-based)		52,709	48,862	48,352
Total Scope 2 (market-based)		1,555	1,518	1,298
Scope 3				
Category 1	Purchased goods and services	125,712	133,769	149,135
Category 2	Capital goods	25,962	22,465	27,010
Category 3	Fuel and energy-related activities	17,994	17,209	10,994
Category 4	Upstream transportation and distribution	Included in Scope 3 Category 1		
Category 5	Waste	836	741	753
Category 6	Business travel	1,233	6,218	7,058
Category 7	Employee commuting	2,179	4,682	7,286
Category 8	Leased assets (up-stream)	Included in Scope 1 and 2		
Category 9	Transportation & 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	4,958	2,436	3,771
Total Scope 3		178,874	187,520	206,009
Total Scope 1, 2 and 3 (location-based)		236,836	241,015	258,950
Total Scope 1, 2 and 3 (market-based)		185,682	193,672	211,896

Notes:

¹ All emissions are reported in tCO₂e.

² 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.

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.

⁴ Certain 2021 and 2022 figures have been restated to account for improvements made to estimation methodologies used in prior years. Restatement has a 26% impact on total reported emissions in 2021 and a 13% impact on total reported emissions in 2022.

⁵ After restatement, previously purchased EACs still provide 100% coverage of electricity consumed in 2021 and 2022. Similarly, previously purchased carbon credits still provide 100% coverage of Scope 1 & Scope 2 steam-related emissions in 2021 and 2022.

Appendix A: Global environmental markets

Environmental markets help internalize the costs and benefits associated with environmental externalities by incorporating them into economic decision-making. By creating financial incentives for conservation, pollution reduction, and sustainable resource management, these markets play a crucial role in promoting environmentally sustainable practices and achieving broader environmental goals. Like any other market, environmental markets allow for the efficient allocation of scarce resources through buyers and sellers voluntarily transacting with each other.

ICE has been a leader in environmental markets for nearly two decades. Today, our environmental markets span Europe and North America – the world’s most liquid environmental markets.

Environmental market mechanisms

A variety of market mechanisms are being used today to facilitate the transition to cleaner fuels by placing a cost on carbon emissions and a value on carbon removal and reduction.

Cap-and-trade

- **Product:** carbon emission allowances
- **Examples:** Western Climate Initiative, Regional Greenhouse Gas Initiative, Washington Cap and Invest Program, E.U. Emissions Trading System, U.K. Emissions Trading System
- Aims to reduce the quantity of carbon emissions with an absolute cap representing the total quantity of tonnes allowed to be emitted into the atmosphere and the only available mechanism to control the quantity of emissions. The allowance (or permit) prices the negative externality of pollution, allowing polluters to pay for the utilization of the atmosphere. Measures the supply (allowances) versus demand (emissions) of the program.

Baseline-and-credit: carbon intensity

- **Product:** emission performance credits (or certificates) / Carbon intensity credits (or certificates)
- **Examples:** China Emissions Trading System, California Low Carbon Fuel Standard, Alberta TIER Emission Performance Certificates
- Aims to reduce carbon intensity not absolute emissions. The baseline represents the permissible level of carbon intensity and credits are issued for reductions below the baseline. The credit prices the positive externality of reducing carbon intensity and the negative externality of pollution, allowing polluters to pay for the utilization of the atmosphere i.e. by purchasing a positive externality you pay for your negative externality. Measures the supply and demand of emission intensity reductions.

Baseline-and-credit: carbon reduction

- **Product:** carbon credit reductions
- **Examples:** avoided deforestation / improved forest management / energy efficiency / renewables
- Issued by governments of California, Alberta and Australia using standards set by Verra, ACR, CAR and Gold Standard
- Aims to reduce carbon emissions not absolute emissions. The baseline represents a counterfactual, hypothetical scenario of what would have happened without the intervention and the credits are is-sued based on actual reductions below the baseline. The credit prices the positive externality of reducing carbon emissions and the negative externality of pollution, allowing polluters to pay for the utilization of the atmosphere – i.e. by purchasing a positive externality you pay for your negative externality. Measures the supply and demand of emission reductions.

Baseline-and-credit: carbon removals

- **Product:** carbon credits removals
- **Examples:** afforestation, reforestation and restoration / Improved forest management / direct air capture
- Issued by governments of California, Alberta and Australia using standards set by Verra, ACR, CAR and Puro
- Aims to increase carbon emission removals. In contrast to reduction credits, removal credits are issued against a baseline of zero. The credit prices the positive externality of removing carbon emissions and the negative externality of pollution, allowing polluters to pay for the utilization of the atmosphere – i.e. by purchasing a positive externality you pay for your negative externality. Measures the supply and demand of emission removals.

Environmental attribute mechanism

- **Product:** energy attribute credits (or certificates)
- **Examples:** renewable electricity / renewable gas / renewable fuels issued by PJM RECs, RINs, E.U. GOOs, U.K. REGOs, and I-RECs
- Aims to increase the production of renewable energy deployment by providing extra revenue to renewable energy producers in addition to the supply of the underlying energy. The credit prices the positive externality of the environmental attributes of renewable energy generation. Measures the supply and demand of renewable energy.

Supporting the energy transition

As the world's leading environmental marketplace, ICE provides transparent and widely accessible markets, tools and associated services to facilitate compliance with government-mandated cap-and-trade programs and corporate efforts to meet net zero goals.

Negative externalities

- **European Emissions Trading** – the E.U. Emissions Trading System (E.U. ETS) is a cornerstone of the European Union's policy to combat climate change and has been a key tool for reducing industrial greenhouse gas emissions cost-effectively since its launch in 2005. ICE Futures Europe lists futures and options contracts for E.U. allowances.
- **U.K. Emissions Trading** – the U.K. launched an emissions trading system (U.K. ETS) in 2021 to replace the country's participation in the E.U. ETS and support the aim of its carbon policy. ICE's auctions and futures markets support the continuity of emissions trading for businesses in the U.K.
- **Western Climate Initiative** – the State of California passed a law in 2006 to reduce greenhouse gas emissions. 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 program. ICE Futures U.S. lists futures and options contracts based on the California Carbon Allowances that form the basis of Western Climate Initiative.
- **Regional Greenhouse Gas Initiative** – 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. RGGI states sell nearly all emission allowances through auctions and invest proceeds in energy efficiency technology and projects, renewable energy and other consumer benefit programs. These programs help spur innovation in the clean energy economy and create green jobs in RGGI states. ICE Futures U.S. lists futures and options contracts based on RGGI allowances.
- **Washington State's Cap-and-Invest Program** – Washington State established a comprehensive, market-based program to reduce carbon pollution and achieve greenhouse gas limits in 2023. ICE Futures U.S. lists a physically delivered futures contract which, if held to expiry, will deliver Washington carbon allowances into the cap and invest program.
- **Alberta Technology Innovation and Emissions Reduction program** – Alberta's TIER seeks to manage Alberta's greenhouse gas emissions through a government mandated market where entities covered under the system have annual obligations. ICE NGX introduced the first cleared futures on Alberta's TIER regulation.
- **ICE Carbon Index** – this index family is based on the four most actively traded carbon markets in the world: E.U. ETS, Western Climate Initiative, RGGI and U.K. ETS. ICE Futures Europe also offers trading on a futures contract based on the index to provide exposure to the four largest cap-and-trade markets in one financially settled instrument.

Positive externalities

Baseline and credit products:

- **Alberta Emissions Offsets and Emissions Performance Credits** – Alberta's TIER program seeks to manage Alberta's greenhouse gas emissions through a compliance market where entities covered under the system, including those which emit 100,000 tons or more of carbon dioxide equivalent per year or import more than 10,000 tons of hydrogen annually, have annual compliance obligations. ICE's futures contracts let entities buy, sell, and hedge their exposure to the credits and the escalating Alberta TIER fund price required by the program.
- **California Carbon Offsets** – the California Air Resources Board issues offset credits to qualifying projects that reduce or sequester greenhouse gases pursuant to approved protocols. Under the Western Climate Initiative, offset credits can be used to partially meet obligations. ICE lists futures based on these credits to help entities manage price and regulatory requirements.
- **CORSIA carbon credit futures** – in 2023 ICE launched a physically-delivered futures contract for credits considered eligible for CORSIA, a global market-based carbon credit program targeted at reducing emissions from international aviation. CORSIA is part of a basket of policy measures taken by the ICAO and allows airline operators to offset an amount of carbon dioxide emissions by retiring carbon credits.
- **California Low Carbon Fuel Standard Credit** – the Low Carbon Fuel Standard (LCFS) is designed to decrease the carbon intensity of California's transportation fuel pool and incentivize the development of low-carbon and renewable alternatives, which reduce petroleum dependency and achieve air quality benefits. ICE's LCFS futures allow market participants to allocate capital to emerging technologies and hedge compliance risk as well as provide price signals.
- **Nature Based Carbon Credits** – in 2022, ICE launched a nature-based solutions carbon credit futures contract. The contract physically delivers credits certified under Verra's Verified Carbon Standard (VCS) and Climate, Community and Biodiversity (CCB) Standards Programs. Each futures contract is equal to 1,000 eligible VCS credits with each credit equivalent to one metric ton of greenhouse gas emissions. These contracts allow the market to value natural assets in the agriculture, forestry and other land use sectors and facilitate the flow of capital to projects that can help the world meet its commitments to carbon reduction.

Energy attribute certificates:

- **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. ICE Futures U.S. launched REC futures and options contracts in 2009. Today ICE lists contracts based on renewable energy programs run by the States of Connecticut, Maryland, Massachusetts, New Jersey, Pennsylvania and Texas as well as voluntary regional programs in the Midwest and Southeast U.S.

- **Renewable Identification Numbers** – the U.S. Environmental Protection Agency’s (EPA) Renewable Fuel Standard (RFS) mandates the incorporation of renewable fuels into transportation fuel. Each year, the EPA outlines the volume requirements for each renewable fuel category and sets those volumes through the annual renewable volume obligation (RVO). The RVO applies to a basket of U.S. Renewable Identification Numbers (RINs) which are credits generated by renewable fuel producers to track the compliance of transportation fuel under the RFS program. Obligated parties, including refiners and importers of transportation fuel in the U.S., must either generate RINs or purchase them to meet their annual commitments. As a result, companies need a means to hedge their RVO exposure. ICE offers RVO and RINs futures to help regulated entities manage and price emissions, as well as meet compliance obligations.

Renewable fuels

Biofuels play a key role in meeting national goals to reduce greenhouse gas emissions in the transportation sector. ICE’s futures offering includes first and second-generation biofuels across several locations.

Additional climate tools and initiatives

ICE Carbon Reference Entity Data Service

ICE CRED is a reference data service for the carbon markets. CRED reference data helps carbon market participants manage carbon credits across the trade lifecycle from point of trade to settlement and provides the opportunity to reduce operational risk and cost and promote greater scalability in their carbon credit trading operations.

ICE Commodity Traceability

This service is in development, targeted to be launch ready for the E.U. Deforestation Regulation that enters into application in 2025 and stipulates that all traders and operators in Europe carry out due diligence on their supply chains to ensure the cocoa and coffee that they trade, process and manufacture is deforestation-free. The service will enable traders and operators to validate and demonstrate that their supply chains meet the requirements of the regulation, facilitating straightforward trading into and within the European market for the global coffee and cocoa industries.

Power purchase agreements

In October 2021, ICE invested in LevelTen, a marketplace for renewable energy power purchase agreements (PPAs). LevelTen aims to accelerate the energy transition by providing access to PPA markets in North America and Europe. The platform also enables developers to sell projects to buyers seeking to own and operate renewable energy projects.

In December 2023, ICE and LevelTen joined AES, Constellation, Google and Microsoft to create the Granular Certificate Trading Alliance, a collaboration to develop a first-of-its-kind trading and management platform for granular certificates, a type of energy attribute certificate that verifies the time and location that carbon-free energy is generated. This new solution aims to enable energy buyers to easily source clean energy generated around the clock, and to incentivize energy sellers to produce clean energy where and when it is most needed, delivering carbon-free grid reliability all hours.

Carbon credit auctions

ICE brings price discovery and transparency to the carbon credit market by connecting a global net-work of high-quality developers with a wide range of potential buyers, all hosted on state-of-the-art trading infrastructure. The carbon credit auction service was built to institutionalize the primary market for carbon credits by connecting buyers directly to project developers, reducing friction in the transaction process and bringing much needed transparency.

ICE Carbon Futures Index Family

The ICE Carbon Futures Index Family is made up of pricing of the four most actively traded carbon markets in the world: the European Union Emissions Trading Scheme (E.U. ETS), the Western Climate Initiative (California Cap and Trade Program), the Regional Greenhouse Gas Initiative (RGGI), and the U.K. Emissions Trading Scheme (U.K. ETS). ICE’s Global Carbon Index Future is based on the index, providing exposure in one financially settled instrument.

Clean Hydrogen Hubs

The U.S. Department of Energy Office of Clean Energy Demonstrations selected ICE as part of a consortium to help accelerate the clean hydrogen economy and support the launch of the Regional Clean Hydrogen Hubs. The consortium will design and implement demand-side support mechanisms for unlocking the market potential of the hydrogen hubs.



ICE Commodity Traceability (ICE CoT) service

The coffee and cocoa industries and countries of origin have made significant investments in supply chain sustainability processes and technology over many years. ICE CoT aims to build on this infrastructure by allowing market participants in the supply chain to upload farm-geolocation, farmer physical-flow (movement, merging and splitting of parcels), and processing (roasting, grinding, converting beans to butter and powder, etc.) data in respect of a product “parcel” into ICE CoT.

ICE CoT is designed to run a series of validation checks on the farm-geolocation and farmer, and the physical-flow and processing data that is submitted, conducted in accordance with published methodologies, in order to establish that the relevant products in the parcel were not made from commodities produced in areas of deforestation, or in protected forest areas, and that the data is reasonable and plausible.

Provided the validation checks in respect of a product are passed, ICE CoT would accept the parcel and store all associated traceability data alongside it.

As a result, ICE CoT could be used to help suppliers satisfy their due diligence obligations under the EUDR and evidence the compliance of their product to potential buyers before they trade, thereby supporting the tradability of compliant coffee and cocoa within the E.U.

When a parcel passes from a seller to a buyer, the seller would record the transfer within ICE CoT and the associated traceability data would remain with that parcel. The buyer of the parcel would be able to view certain traceability data for the parcel, such as the list of plots from which the product was sourced. More sensitive traceability data, including the full chain of custody and physical movement of the product, would remain confidential, unless the seller chooses to make this information visible to the buyer.

If an NCA needs to conduct checks on a buyer under the EUDR, ICE CoT could make the full set of traceability data available to that NCA as required.

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Appendix B: Data, indices, analytics

Access to high quality data is essential for market participants to understand the impact their decisions have on the planet, people in their communities and their companies or portfolios. ICE provides data and analytics to measure performance, manage risk and support the flow of capital into more sustainable investments.

Climate data

ICE provides climate data and analytics for multi-asset class securities including public and private corporates, municipals, mortgage-back securities, sovereigns and real estate properties. Designed by climate risk specialists, the data and tools help asset owners, asset managers, investors and companies identify, measure and understand the potential climate risks and opportunities within portfolios and loan books.

- **Physical risk** – ICE applies geospatial climate, economic and demographic data to specific U.S. municipalities, MBS pools, corporates, sovereigns and related fixed income securities. Data includes climate value-at-risk metrics, GDP impairment metrics, physical climate risk scores, climate-conditioned hazard projections for hurricane, wildfire, flooding and underlying data.
- **Transition risk** – ICE integrates climate data and science-aligned analytics at a company, sector and portfolio level. Data includes carbon emissions (Scope 1, 2 and 3), temperature targets, portfolio foot-printing, net zero analysis / projections to 2050, implied temperature rise, avoided emissions, supply chain emissions analysis and portfolio screener / CVaR.

Impact bond data

Impact bond issuance continues to grow as investors seek ways for their capital to contribute to sustainability goals. To bring greater transparency to this market, ICE provides data that align with industry-recognized impact bond frameworks and use of proceeds and impact bond analytical dashboards to help investors understand coverage.

Social impact data

ICE's Social Impact Data provides socioeconomic and demographic insight on the municipal bond, mortgage-backed security and sovereign markets, enhancing the decision-making process for investors. The dataset, which includes scores and underlying health, demographic and geospatial metrics, helps quantify the potential social impact of a financial investment in a community. It helps identify the greatest opportunity for improvement so that targeted investments can bring resources to vulnerable and marginalized communities.

Sustainability 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 sustainable factors in addition to other criteria. For some indexes certain factors from ICE Sustainable Finance data are incorporated as part of the index construction process.

ICE partnered with MSCI to launch the first suite of futures referencing MSCI sustainable and climate indices, including MSCI Climate Paris Aligned Indices. These futures are standardized contracts listed on ICE Futures U.S. and tradable alongside the MSCI EM and MSCI EAFE futures.

Company data

ICE provides granular data on companies that is collected and quality-controlled to offer continuously updated information on sustainability risks and opportunities for financials evaluating such within their portfolios. The data covers a comprehensive set of datapoints and a proprietary security mapping service allows the data to be available across a broad range of fixed income and equity securities.

Regulatory data

ICE offers granular data to support the implementation of climate related regulation and frameworks:

- **Sustainable Finance Disclosure Regulation (SFDR)** – to aid in compliance, ICE offers an SFDR Principal Adverse Impact (PAI) solution, which offers continuously updated input values for most of the SFDR indicators. The dataset captures company-reported data points from publicly-available sources and reports. It also leverages our extensive global securities database and established corporate hierarchy information, so that ICE's SFDR PAI solution allows clients to link equity and fixed income security holdings to the closest disclosing corporate entity.
- **Task Force on Climate-related Financial Disclosure (TCFD)** – ICE's TCFD Data leverages company level climate transition data and analytics, entity data, as well as green bond data, to provide the information needed for the metrics and targets reporting required in the TCFD framework.
- **UN Sustainable Development Goals (SDGs) for municipals** – by combining our geospatial modeling technology with deep municipal capital markets expertise, ICE can tap into multiple sources of publicly available data to create quantifiable metrics to help clients in their investment decision making. The resulting ICE data items are directly mapped to 45 UN SDG defined targets, which can be used for peer comparison of issuers or issues on a like-for-like basis to assess progress over time to meeting 15 high-level goals.

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Appendix C: NYSE issuer engagement

We have dedicated resources to advise and support NYSE-listed companies as they work to increase and improve sustainability disclosures. These include educational opportunities, resources and working groups, as well as platforms for dialogue between issuers and investors.

Specific offerings include:

- Sustainability advisory team
- Company Data Viewer – designed to help companies measure and benchmark their existing disclosures versus peers and industry
- NYSE Sustainability Reporting Guidance ([guidance](#))
- Sustainability best practices guides, topical research, and a weekly sustainability-focused newsletter ([website](#))
- Hosted sustainability webinars and online resources
- In-person and online networking opportunities connecting sustainability and stakeholder-communications-focused experts within NYSE-listed companies
- IR Services program to help companies deliver their message to investors focused on sustainability, climate and other topics

NYSE Sustainability Advisory Council

The NYSE Sustainability Advisory Council launched in 2022 to bring together sustainability leaders within the NYSE community to identify and share global best practices on sustainability issues. The council includes representation from sustainability veterans overseeing leading disclosure programs from a broad range of sectors.

NYSE's Board Services program

In 2019, the NYSE's Board Services program launched to address the critical need for diverse, inclusive leadership on corporate boards and help identify board-ready candidates from underrepresented groups. This solutions-based approach is a resource to help public and private companies meet their market-driven board diversity needs.

The NYSE leverages its relationships with CEOs of some of the world's largest and most well-established companies. These CEOs participate by leveraging their own personal and professional networks to identify and recommend talented, diverse, board-ready candidates. NYSE invites the nominated candidates to upload their bios to an online database and offers training and other programs to help candidates prepare for board service.

In addition to educational and networking opportunities for the board candidates, the program hosts a series of live events designed to connect diverse candidates to NYSE-listed companies seeking to refresh their boards.

The candidate pool has grown to more than 700 and, through the end of 2023, the program had helped place more than 40 diverse candidates on corporate boards.

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Appendix D: 10-K risk disclosure

Climate change may increase the frequency or severity of extreme weather events, and if we are not adequately resilient to deal with acute climate events, our operations, either in a particular location or globally, may be impacted. Extreme weather events could also 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.

In addition, the transition to renewable energy involves changes to consumer and institutional preferences around energy production and consumption, and the possible failure of our products or services to facilitate the needs of customers during the transition to renewable energy could adversely impact our business and revenues. Changing 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. We are also subject to risks relating to new or heightened climate change-related regulations or legislation, which could impact us and our customers and result in increased regulatory, compliance or operational costs. We are also subject to reputational risks relating to the perception of whether or not we are facilitating a migration away from fossil fuels. For example, our reputation could be damaged as a result of our offering certain products or services associated with causing or exacerbating climate change, or by any decision by us to continue to conduct or change our activities in response to considerations relating to climate change.

The risks associated with climate change and the transition to renewable energy are continuing to evolve rapidly, and we expect that climate change-related risks may increase over time.

UN Sustainable Development Goals

We look to the UN's Sustainable Development Goals for guidance and align where we see the opportunity to do so.

4	Quality education	We have a vested interest in creating a more inclusive financial system, educating the next generation of investors and entrepreneurs and empowering people to take control of their financial well-being. Financial education is the cornerstone of our charitable efforts. We underwrite and partner with various organizations globally to help increase financial literacy, particularly for underserved populations.
5	Gender equality	Our approach to increasing and supporting diversity extends across three pillars: our Board of Directors, our employee population and across the broader community of companies we work with. See the Diversity section of this report for more detail.
7 & 13	Affordable and clean energy & climate action	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. See the Environmental Risks and Opportunities and TCFD sections of this report for more detail.
17	Partnerships for the goals	<p>We are part of several organizations that bring people, companies and NGOs together to help achieve the SDGs. We encourage and support NYSE issuers as they navigate the evolving sustainability landscape, including sustainability reporting guidance as well as resources and platforms for dialogue between issuers and investors.</p> <p>We are also members of:</p> <ul style="list-style-type: none"> ▪ UN Sustainable Stock Exchange Initiative and derivatives network ▪ Principles for Responsible Investing (PRI) ▪ World Federation of Exchanges Sustainability Working Group ▪ Global Coffee Platform ▪ Environmental Markets Association ▪ International Emissions Trading Association ▪ Sustainable Investment and Finance Association ▪ Taskforce on Nature-related Financial Disclosures



Employee data

The data in this section is from 2023, covers our global employee base and does not include contractors and contingent workers unless indicated otherwise.

Employees	
Global	13,222
U.S.	8,074
EMEA, APAC and India	5,148

U.S.	
Florida	2,970
New York	1,506
Georgia	1,295
California	805
Massachusetts	318
Illinois	256

EMEA, APAC and India	
India	3,344
U.K.	795
Continental Europe	420

Includes all full-time employees across our global locations, including Black Knight.

Annual voluntary turnover	
2023	8.1%
2022	14.2%
2021	10.5%
2020	5.5%
2019	8.3%

Includes all full-time employees across our global locations, excluding Black Knight.

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

¹This question was not included in our 2018 survey.

²This data does not include Black Knight.

We plan to report on the results from our 2024 survey in the 2024 annual sustainability report.

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 17, 2024

Employees

Global officers

Female	27%
Male	73%

U.S. employees

	Officers	Executives	Management	Staff
Female	28%	24%	30%	32%
Male	72%	76%	70%	68%

Black	5%	4%	4%	9%
Hispanic or latino	2%	2%	3%	5%
Asian	16%	23%	38%	33%
White	76%	67%	51%	47%
All other	1%	4%	4%	5%

U.K. employees

	Officers	Executives	Management	Staff
Female	33%	23%	29%	33%
Male	67%	77%	71%	67%

Black	0%	3%	5%	6%
Hispanic or Latino	N/A	N/A	N/A	N/A
Asian	0%	26%	30%	38%
White	89%	67%	60%	49%
All other	11%	4%	5%	7%

Data as of January 1, 2024. Race / ethnicity categories and traditional gender categories of male and female 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 approximately 57% of our total employee population.

This data does not include employees associated with Black Knight.

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2018	2019	2020	2021	2022	2023
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