2022
Sustainability Report

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Letter from Chairman + CEO

The growth of financial markets depends on standards. Standardization is a key element of the transparency on which our markets rely. The NYSE, for example, can trace its roots to the Buttonwood Agreement, when 24 stockbrokers agreed on the basic standards of their trading.

Today's markets for commodities, futures, derivatives, structured financial products and much more operate based on common standards that allow both buyer and seller to know the terms of the contracts in which they transact and facilitate the efficient flow of capital across global markets. At ICE, our business is based on providing the infrastructure, data and technology that these markets operate through.

The history of sustainability in the financial world begins much more recently, where just this century we have started to develop and agree on standards. The consensus on the measurement of greenhouse gas emissions has less than a twenty-year history, and the standards for how to measure biodiversity are just being written today.

At ICE, we are proud to contribute to the formation of standards. Through our environmental markets, our data services, and within our NYSE listed company universe, we're helping build consensus around how to evaluate the non-financial risks that may be financially material to a company or otherwise important to investors making decisions about where to deploy their capital.

There is a risk that too many different, well-intentioned standards do not contribute to the benefits that a common standard provides. While no single standard can meet every possible need for every possible stakeholder, we should consider with each agreement, especially those that cross borders and jurisdictions, the value that the common understanding helps unlock for all stakeholders.

The most effective standards are created when all the necessary voices have a seat at the table. Today ICE is directly involved in these conversations, acting on behalf of our clients to bring their voices to policymakers and other standard-setting organizations across the globe.

This report, our eighth annual report, summarizes the steps ICE is taking to address sustainability within our own walls as a company, as well as through the products and services we make available for our customers. We welcome your feedback as we continue to evolve how we approach and report on sustainability.

Jeffrey C. Sprecher
Chair and CEO, Intercontinental Exchange, Inc.

About us

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

Our culture is based on core values that inform the way we operate:

- **Integrity & professionalism** – We hold ourselves and each other to the highest standards.
- **Collaboration** – We work as one team focused on a common set of objectives and committed to each other's success.
- **Communication** – We communicate clearly, constructively and frequently.
- **Problem solving** – We focus on identifying and solving our customers' needs and make well-informed, quick decisions.
- **Leadership** – We lead by example.

ICE is a provider of market infrastructure, data services and technology solutions 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 residential mortgages in the US, provide our customers with access to mission critical tools that are designed to increase asset class transparency and workflow efficiency. Although we report our 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 marketplaces for the listing, trading and clearing of a broad array of derivatives contracts and financial securities.
- **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 solutions.
- **Mortgage technology** – We provide a technology platform that offers customers comprehensive, digital workflow tools that aim to address the inefficiencies that exist in the US residential mortgage market, from application through closing and the secondary market.

2022 financial metrics

Net revenues[1]	**+2% y/y**	Adjusted diluted EPS[2]	**+5% y/y**	Operating cash flow	**+14% y/y**
$7.3B		**$5.30**		**$3.6B**	

[1]Adjusted figures represent non-GAAP measures. Please refer to ICE's 2022 Form 10-K filed on February 2, 2023, for reconciliations to the equivalent GAAP measures.
[2]Net of transaction-based expenses.

At the end of 2022 we had nearly 9,000 employees based in 51 offices located in 20 countries. Nearly 5,000 are based in the US, mainly New York, Georgia and California. Outside the US, our largest locations are in India, the UK and continental Europe. See the Data and reporting frameworks section of this report for more detail.

About this report

Reporting

This report is our eighth 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 2022; our past reports are archived on our website.

We use reporting standards to provide data and benchmarks that can be compared to our sector peers on a like-for-like basis including:

- Taskforce on Climate-related Financial Disclosures (TCFD)
- Carbon Disclosure Project (CDP)
- Sustainable Accounting Standards Board (SASB)
- UN Sustainable Development Goals (SDGs)

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

We are closely following proposed rulemakings across regulatory regimes, including the SEC's climate and human capital disclosure rules and work underway by the International Sustainability Standards Board (ISSB) to create global sustainability accounting standards. We support efforts to streamline reporting standards and continue to contribute to those efforts through various feedback channels.

Our May 2022 acquisition of Black Knight is pending regulatory review as of publication of this report. Assuming the transaction is completed, we plan to incorporate Black Knight's operations into a future report following integration of the business.

This report covers:

- How we approach management and oversight of sustainability.
- Items where we made most progress in 2022.
- Our efforts to advance financial inclusion.
- An index of key data points, including our greenhouse gas footprint, employee diversity data, TCFD report and SASB metrics for the Equity and Commodity Exchange and IT Services and Software standards.

The remaining sections, which account for the bulk of this report, 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

- Employee retention, attraction and engagement
- Diversity and inclusion
- Learning and development

Risk management

- Cybersecurity and data protection
- Business continuity and disaster recovery
- Ethics and compliance

Environmental risks and opportunities

- Emissions reduction targets and decarbonization plans
- Assessment of physical and transitional climate impacts
- Opportunities in sustainable finance products and services

Additional resources

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

- Sustainability website
- 10K and Proxy Statement
- Information Security
- Data Privacy
- Code of Conduct and compliance policies
- Modern Slavery Act Statement
- Tax Arrangements

Approach to sustainability

Consistent with prior years, our approach to sustainability is driven by strong board oversight and an integrated strategy that reaches throughout the company.

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 issues as needed.

Management

Our overall strategy is guided by a Sustainability Governance Committee 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
- President, Sustainable Finance & Chief Regulatory Officer
- President, New York Stock Exchange
- President, Fixed Income & Data Services
- President, ICE Mortgage Technology
- Senior Vice President, Futures Exchanges
- Vice President, Corporate Affairs & Sustainability

This committee meets quarterly and communicates frequently to assess ESG risks and opportunities across the company.

Several departments play a critical role in our approach to sustainability, including the human resources, facilities, risk management and business continuity teams. Our vice president of sustainability coordinates these efforts and oversees our disclosures and strategy.

Our president for sustainable finance oversees the development of sustainable products and services companywide and guides our mission to provide innovative market tools to help our clients achieve their own climate risk and opportunity strategies and meet other sustainability goals.

Stakeholder engagement

We believe that the success of our business relies on our ability to deliver on our purpose as a company for each of our major stakeholders. Good shareholder returns go hand-in-hand with engaged employees and satisfied customers.

Materiality analysis

To ensure we fully understand the views of our stakeholders, we worked with a third-party consultant to conduct a formal materiality analysis in 2020 to gather feedback from our employees, customers, investors, suppliers and communities. We have informally refreshed the assessment since then through ongoing dialogue with our stakeholders and plan to do a formal update following the acquisition of Black Knight.

As mentioned above, a large part of this report focuses on the areas deemed to be most relevant for our business and stakeholders based on this analysis. Areas of Focus

Engagement channels

We are in regular contact with our major stakeholder groups to understand and respond to issues of top interest. Examples of this engagement include:

Stakeholder group	Engagement channels
Employees	Intranet, email, instant messaging platforms Town halls Meetings, social and volunteer activities Surveys Annual performance reviews and ongoing feedback channels Complaint reporting hotline (i.e. whistle-blower hotline)
Investors	Annual general meeting of stockholders Quarterly earnings calls Investor conferences Analyst meetings
Customers	Surveys Events Webinars Podcasts Meetings
Vendors	Onboarding assessments Annual vendor reviews
Regulators	Comment letters Participation on advisory committees Hearings
Communities	Volunteer activities Charitable giving

Updates and new developments

While certain sustainability goals are clear, others continue to evolve, sometimes rapidly. In both cases, we are working to make constant progress and aim to improve this report each year with better and more refined disclosures to reflect what we are doing to meet the evolving needs of our stakeholders. In 2022, new developments included:

Carbon reduction targets

We committed to working toward the reduction of Scope 1 and 2 emissions by 50% by 2032 from a 2021 baseline. Additionally, we are focused on putting in place a robust system to engage, manage and reduce our supply chain footprint to address our Scope 3 emissions. You can find more detail on our decarbonization plans in the Environmental risks and opportunities section of this report.

Carbon Disclosure Project (CDP)

We submitted our first comprehensive CDP questionnaire in 2022 and intend to report again in 2023.
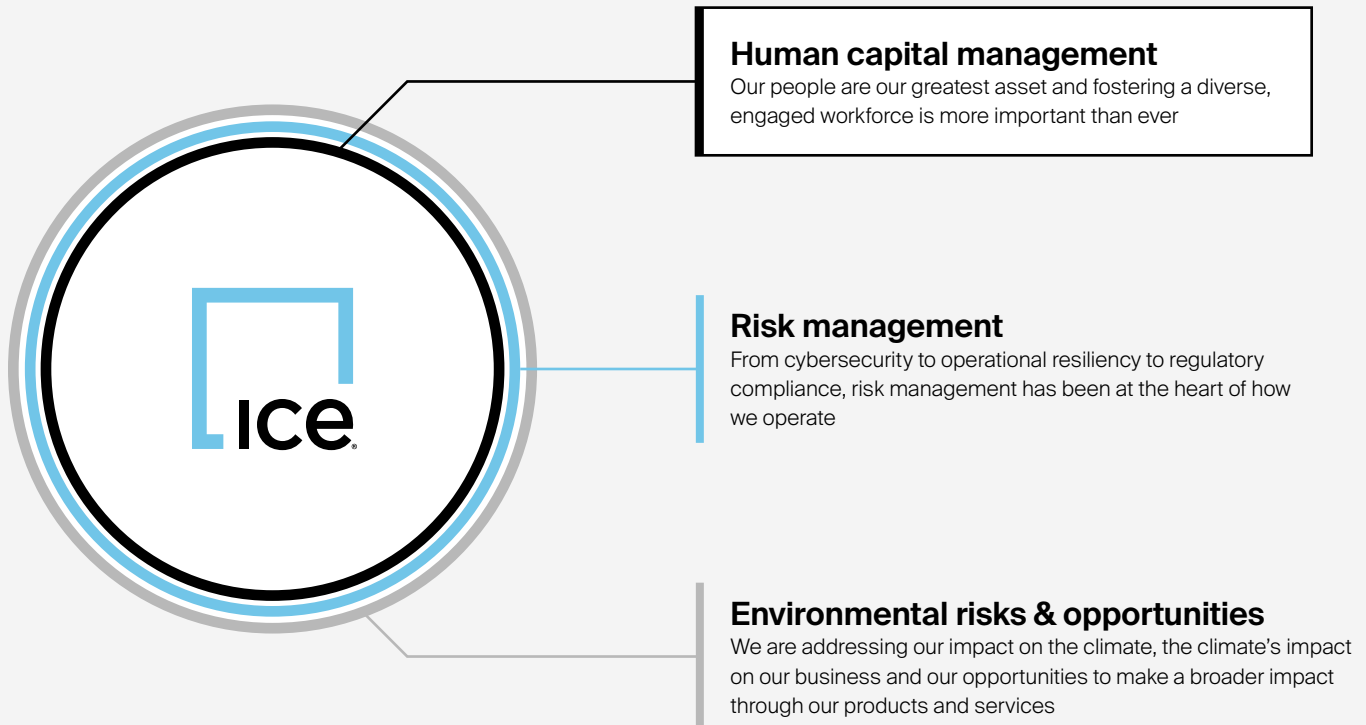
Human capital data disclosures

As we continue to look for both quantitative and qualitative ways to better share our efforts around employee engagement, retention and attraction we included detailed reporting for 2022 including on our learning and development programs and employee survey practices.

Sustainability reporting timeline

2016	2019	2020	2021	2022
Issued first sustainability report	Began offsetting greenhouse gas footprint through purchase of renewable energy certificates and carbon credits Disclosed diversity data for US employees including EEO-1	Conducted formal materiality analysis Published first SASB report Published full Scope 1, 2 and partial Scope 3 greenhouse gas footprint Disclosed employee engagement data from employee survey Expanded diversity disclosures for board to include race and ethnicity Published partial TCFD report	Published first full TCFD report Expanded SASB report to cover metrics from additional sector Published greenhouse gas footprint including all relevant Scope 3 Expanded diversity data disclosures to include UK employees	Completed first comprehensive CDP questionnaire Set carbon reduction targets for Scope 1 and 2 greenhouse gas emissions Announced gender and race / ethnicity targets for officer population

Areas of focus

Based on the results of our materiality analysis, this section of the report is a detailed update on how we approach human capital management, risk management and our environmental risks and opportunities.

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

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

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

Human capital management

Our ability to succeed as a company and deliver for our customers and stockholders relies on an engaged and productive team. Retaining and attracting the best talent is what enables us to fulfill our purpose as a company for all stakeholders. Given its critical importance to our business, we have worked to expand the qualitative and quantitative human capital data we provide in this report to give better insight into how we approach and manage the risks and opportunities related to our workforce.

Human capital management is a broad topic that touches many aspects. For purposes of this report, we focus on:

- Measuring employee engagement, retention and attraction
- Diversity and inclusion
- Learning and development opportunities

Measuring employee engagement, retention and attraction

While employee retention and attraction can be quantified in a relatively straightforward way, employee engagement is one of many nebulous sustainability terms that can be taken to mean any number of things. Although we struggle precisely define it, we know it is critically important and a direct line to our ability to retain and attract talented employees.

We use a mix of methods to measure engagement and identify areas of concern or opportunity. These include employee surveys, performance reviews, an "always-on" approach to feedback and a culture that encourages an inquisitive environment generally. Each of these inputs contributes to a more complete picture that allows us to assess trends and take actions as needed.

Employee surveys

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

Our biennial companywide survey is framed around the core values that form the basis of ICE's culture. The survey is designed to question whether the day-to-day employee experience matches the culture we aim to build.

Results

Results continue to be positive, including as measured by the commonly cited benchmark statement: "Overall, I would recommend ICE to a friend as a good place to work," although we did see a decrease from the previous survey in our 2022 results. Additional detail can be found in the Data and reporting frameworks section of this report.

Follow through

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

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. Progress updates on each item are communicated regularly and additional feedback is incorporated. 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.

Performance reviews and ongoing feedback channels

Our formal, annual review process is complemented by a robust culture of "always on" feedback channels. Compensation is tied to individual results, company results and based on the core values that underpin the culture we aim to foster.

Turnover

Due to M&A activity, we sometimes see significant increases and decreases in our headcount year to year related to acquisitions and divestitures. As it relates to onboarding employees from acquired companies, 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, operating using our core values, understanding our policies and making meaningful connections.

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

Year	Rate
2022	14.2%
2021	10.5%
2020	5.5%
2019	8.3%
2018	9.4%
2017	7.7%
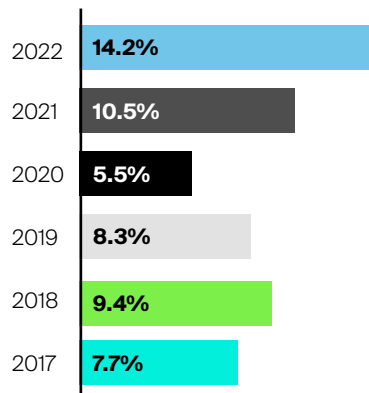
Includes all full-time employees across our global locations.

After dropping well below our historical levels in 2020, presumably related to the onset of the pandemic, we saw increases in 2021 and 2022, which appear to be part of broader trends in the labor market as the workforce resets following nearly two years of lockdowns and remote work. A large portion of those leaving during 2021 and 2022 were recent hires that came onboard during the pandemic and in many cases never worked from one of our offices or met in-person with any colleagues.

As we continue to adjust to a post-pandemic environment that includes a mix of in-office and remote working, we are improving engagement through technology tools, new training opportunities for those who work on a hybrid schedule or manage hybrid teams, as well as intentional efforts to make sure virtual connections are taking place on a regular basis.

In the fourth quarter of 2022 through year-to-date in 2023, we have seen voluntary turnover rates fall back in line with our pre-pandemic averages.

Diversity and inclusion

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.

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 an important 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. When the committee has conducted recent searches for new directors, including through the use of a third-party recruiting firm, it has focused on pools of qualified directors that have also added additional diversity to the ICE Board and Subsidiary Boards, when the director candidates' skill sets qualify them to also serve on a Subsidiary Board of Directors. The committee considers the same factors in determining whether to re-nominate an incumbent director. Diversity is also considered as part of the annual Board evaluation.

Efforts to refresh and diversify our Board in recent years have resulted in a board of 10 directors today that is 60% female and 30% persons of color.

Employees

We are working to increase diversity throughout our employee ranks and deploying both a top-down and bottom-up strategy to do so.

Targets

We recognize that change is often led from the top and have set specific, time-bound targets for increasing diversity in our officer pool. These targets were announced in 2022, with a goal to reach them by 2026.

- Increase representation of female officers globally from 23% to 30% in five years.
- Double representation of under-represented minorities[1] in our US officer population from 6% to 12% in five years.
- As we work toward these five-year goals, we commit to realizing linear increases.

    [1] Under-represented minorities are defined using the following EEO categories: Black or African American, Hispanic or Latino, American Indian or Alaskan Native.

As of June 2023, our global officer population is 27% female and our US officer population is 7% under-represented minorities. Our officer-level promotions typically occur in May/June each year, meaning these figures will not align to the calendar year diversity data included in the Data and reporting frameworks section of this report or our 2022 EEO-1 data.

Strategy

As noted, we think greater diversification at the top can serve as an important catalyst and have focused efforts in place to make progress there. Additionally, we need to have a strong pipeline of diverse leaders moving up throughout the organization and we are equally focused on building that base through our new hire process.

We take several steps to enhance diversity through our hiring process, including:
- Working with and reaching out to organizations to help attract a diverse pool of candidates. Examples of organizations that we partner with are:
    – Wall Street Bound
    – Knowledge House
    – Career Spring
    – City of Refuge
    – Women Who Code
    – 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

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.

Inclusive work environment

We foster an inclusive work environment that does not tolerate discrimination or harassment of any kind. An important component to building an inclusive work environment is visibility, and through internal communications and our social media presence we feature diverse content.
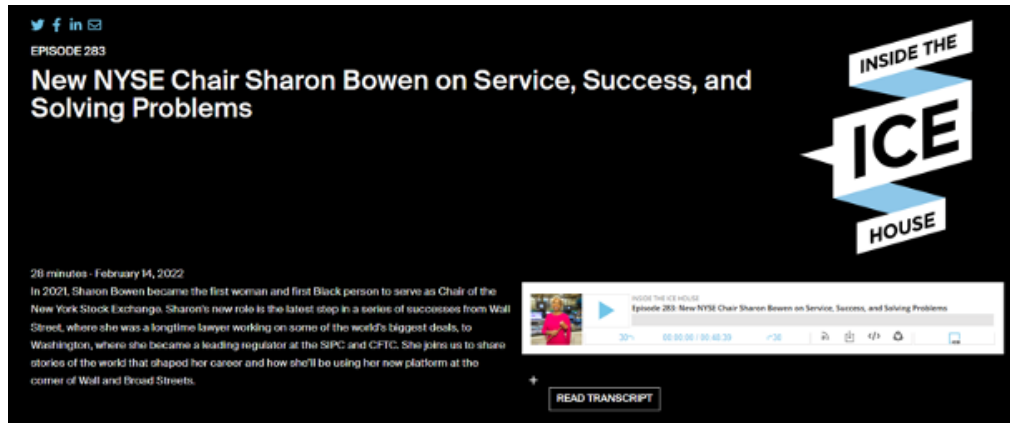
Inside the ICE house: New NYSE Chair Sharon Bowen on Service, Success, and Solving Problems

NYSE President Lynn Martin and journalist and author of *When Women Lead* Julia Boorstin discuss overcoming gender stereotypes and the future of leadership at an event with ICE employees in December 2022.

Oversight

To hold ourselves accountable and provide transparency on our path to increasing diversity throughout our organization, we publish various diversity metrics, including our annual EEO-1 data. Our Human Resources officer formally reports to the ICE Board, and specifically the Compensation Committee, twice a year on our progress.

EEO-1   2018   2019   2020   2021

In line with US Department of Labor reporting timelines, we will file and post our 2022 EEO-1 data after the filing window opens in July 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 US and UK populations, which account for approximately 63% of our total employee population. This data can be found in the Data and reporting frameworks section of this report. We are also reporting for the first time a gender breakout for our officers globally, to provide transparency on our progress toward our five-year target.

Community of companies we work with

NYSE Board Advisory Council

In 2019, the NYSE Board Advisory Council 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 an online database and offers training and other programs to help candidates prepare for board service.

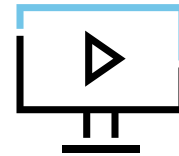**NYSE Board Advisory Council Highlights**

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

The council's efforts have yielded a candidate pool of more than 500 and, to date, the council has helped place 35 diverse candidates on corporate boards.

Our podium

Through the NYSE we have an opportunity every day to host world leaders, industry groups, nonprofit organizations and notable personalities in business, sports, entertainment and culture. For our employees, for those who work and live in New York's Financial District, for those who attend or tune in to our Opening and Closing Bells and for those who we reach through our social media channels, broadcasts and podcasts – we are able to raise awareness and visibility for a diverse set of groups and causes.

Our location at 11 Wall Street serves an important part of the NYSE's work to connect people to opportunity and collaborate with our community.

NYSE celebrates Black culture during Black History Month with NYSE-listed Gap Inc. and The Brooklyn Circus (February 28, 2023).

Learning and development opportunities

Our team's ability to grow and develop is critical for employee engagement and necessary for the success of the business.

> 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.

Strategy

We have learning and development resources tailored for all levels throughout our organization. From the day of hire throughout one's tenure at ICE, programs are available to help our employees develop skills, learn about the business and advance their careers.
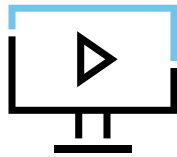
Career development at ICE

Our training is delivered in a variety of ways to meet the needs of our employees ranging from required to opt-in and on-demand.

Required resources

Certain programs and courses are required at various points in an employee's journey including:

- A three-part series for all new hires on ICE business and culture.
- Required curriculum for all people managers hired or promoted to roles as manager, senior manager and director.
- Mandatory trainings for all employees and contractors covering ethics, cyber and other compliance topics required at hire and refreshed annually.
- Additional training required for certain roles based on regulatory, product and technology needs.

Opt-in resources

Additional resources are available for employees who want to take control of their career development, including:

- One-off sessions (two-to-four hours each) tailored for individual contributors or people managers on topics such as communication, decision making, managing tough conversations and emotional intelligence.
- Multi-month program on how to grow your career at ICE, available for all employees.
- Six-month programs for people managers, tailored by level, covering core management competencies.
- Leadership Development Program for select participants annually nominated by senior management team.

On-demand resources

To meet point-in-time training needs and allow the flexibility for employees wishing to learn at times that best suit their schedules and workflow, we make available a number of online training resources, including:

- Training portal of over 5,000 online courses covering broad range of topics including basic and advanced technical skills as well as soft skills.
- Online introduction to ICE series covering ICE history, strategy and culture.
- Dozens of in-house created modules covering ICE's business at a high level with additional deep dive content into business units and product lines available.
- Hiring manager training resources covering interview practices and unconscious bias.
- Monthly sessions by senior leaders on various topics.
- Weekly technical sessions on specific product developments.
- Curated training playlists for specific functions.

Internal awareness and manager engagement

As we have expanded our learning and development programs over the past few years, the importance of concurrently building strong internal awareness around what's available is clear. Simply put, great learning and development resources are only valuable if the people that need them know they are available and have the time to take advantage of them.

In 2023, we are focused on raising awareness around our programs through various internal communications channels. We are also focused on further engaging managers to help their team carve out the time for training and discuss how the learning can be applied. The benefits of this engagement are many-fold and include making sure we get the best ROI for our learning and development investments as well as helping ensure our people managers are engaged in career development discussions with their teams, which we know is an essential element of retention.

Programs

Our current programs are the result of additional investments that have enabled us to expand our reach throughout the company. Our program content falls into two categories:

- Resources to develop people, communication and leadership skills.
- Resources to learn more about ICE and our businesses.

Resources to develop people, communication and leadership skills

In addition to a broad library of on-demand resources mentioned earlier, the following programs are available:

- **Leadership Development Program** – Approximately 30 directors and senior directors are nominated each year by the senior management team based on potential for continued development as key leaders in the organization. They engage in a mix of learning activities including in-person and virtual workshops, peer learning sessions, a multi-rater 360 feedback tool, and follow up group sessions with certified coaches. This program also provides opportunities to connect with peers and ICE's senior leadership. Our expectation is that participants will come out of this program with greater levels of competence and confidence as leaders, and with connections that will enable more effective collaboration across the organization.

- **Leadership Journey: Senior Directors** – This is a six-month training program recommended for any senior director to engage with a diverse group of peers, receive feedback from a confidential leadership assessment and consult with an executive coach in several group coaching and mentoring sessions.

- **Leadership Journey: Directors** – This is a six-month curriculum that focuses on building upon existing management skills and encouraging leaders to identify and develop critical competencies needed to increase influence, effectiveness and impact. This program is recommended for current directors and is mandatory for newly hired or promoted directors.

- **Leadership Journey: Managers & Senior Managers** – This is a six-month curriculum recommended for those with direct reports that focuses on building core management competencies and preparing managers to lead effectively at ICE with our core values in mind.

- **New Leader Training** – This program is required for new managers and senior managers. Over the course of the year participants engage in a combination of online courses, webinars and discussions that are designed to create a baseline of management and leadership knowledge and skills. The curriculum is designed to provide convenient access to key training that managers will need during their development journey. This includes 24/7 access to a library of resources that will help them to pursue and manage their own development.

- **Growing Your Career at ICE** – This five-part series is available for all employees and is designed to help develop foundational skills valuable at any point in one's career. Topics include managing your personal brand, building credibility and influence, mapping your career, positioning yourself for career success

and learning more about the ongoing development resources available at ICE.

- **Individual Contributor Workshops** – Throughout the year we run one-off workshops to help to develop new interpersonal or leadership skills. Topics include decision making, communication, influencing without authority, time management and developing emotional intelligence.

Resources to learn more about ICE and our businesses

Employees working together to solve customer problems across levels and business lines is part of our culture and key to our strategy. Having a broad understanding of our business products and strategies is important for everyone. A few of the ways we help ensure this include:

- **Introduction to ICE** – This three-part series is required for all new hires and is available on-demand for anyone looking to refresh their knowledge. It covers ICE's business, strategy and culture.

- **Deep dives** – For each of our business segments we have multi-part training modules available for business lines and products. For certain roles, these may be required at hire or on a recurring basis.

- **New developments** – We hold weekly and monthly live sessions with subject matter experts conducting Q&A on a broad range of topics.

Recent developments

We are constantly iterating on our programs in response to feedback and the development of new best practices. A few recent enhancements include:

- **New hire introduction** – We upgraded our orientation program to give new hires a more comprehensive, engaging and timely introduction to ICE in 2022.

- **Focus on people managers** – We continued to build up our offering of programs tailored for people managers, with a focus on both core leadership skills and emerging competency needs such as leading hybrid teams and talent retention. New launches in 2022 included the Leadership Journey programs for directors and senior directors.

- **Career development** – Based on feedback that employees wanted additional support for managing their careers, we developed and launched a new annual series on growing your career at ICE.

- **Expansion of business training** – We expanded the reach of our business training team to cover the full extent of our business and scale up opportunities for all employees to learn about different areas of ICE in 2022.

- **Intranet enhancements** – We overhauled our learning and development microsite to provide a better user experience and help employees to access resources more easily.

- **Tailored packages** – We've created packaged playlists of training content to meet the needs of various business functions, specific skillsets and product lines.

Culture

We understand that a company's culture is not simply what it says it is in their recruiting materials or executive communications. It is how we actually engage with each other every single day. And it is an organic, ever-changing thing. To help make sure our culture is what we want it to be, we have set out core values that are embedded into many aspects of the way we work.

These values have been a core 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 built into our Code of Conduct, our annual performance and compensation reviews, our learning and development programs and form the basis of our employee survey. They are revisited on a regular basis by our executive management team and refreshed when needed.

Benefits

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

Equal Access

Under our US 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 US
- Tax advantaged savings accounts for dependent care arrangements in the US

Wellness

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 an employer match program in the US, and an Employee Stock Purchase Plan available in nearly all our locations.

Giving back

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

ICE core values
- **Integrity & professionalism** We hold ourselves and each other to the highest standards
- **Collaboration** - We work as one team focused on a common set of objectives and committed to each other's success.
- **Communication** - We communicate clearly, constructively and frequently
- **Problem solving** - We focus on identifying and solving our customers' needs and make well-informed, quick decisions
- **Leadership** - We lead by example

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

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

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

Risk management

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 Chief 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 & 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 our TCFD report, which is located in the Data and reporting frameworks section of this report, and our CDP questionnaire, which is publicly available on CDP's website.

System Resiliency, Business Continuity Planning, Disaster Recovery

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

Our crisis management team handles our end-to-end response to any potential issues and regularly conducts global drills to ensure our processes are ready to be implemented. Our operations team maintains an incident management program to handle any incident with operational impact - security or otherwise. The goal of the incident management program is to provide a cohesive framework for the communication, resolution and recording of incidents and to ensure incidents are resolved in a planned and controlled manner so that any interruption is resolved quickly and normal operations are restored.

- System resiliency and business continuity management is a core tenet of our system design process and redundancies are purpose-built into our applications, network infrastructure and across primary and backup data centers.
- Such design resiliency may include "hot/hot" system components with real-time failure capabilities, readily available back-up components, robust recovery and/or failover procedures, and geographically-diverse backup data centers. These geographically diverse "like for like" disaster recovery data centers are maintained and governed by an enterprise-wide policy. Per policy, all ICE core procedures, systems and operational tasks are duplicable in recovery facilities, exercised at least annually and documented comprehensively.
- Following each acquisition of a new company, this process is reviewed to ensure crisis management procedures are in place across our entire organization.
- Board oversight includes quarterly reports to the Risk Committee on technology operations and governance.
- Employees are trained annually on our business continuity procedures to ensure readiness and understanding.

Cybersecurity and data protection

ICE ensures both the physical and digital security of our markets, clearing houses, data and mortgage software through industry-leading security technology and processes. Our Information Security Department consists of diverse and skilled teams that work to protect confidential data and systems from unauthorized access, misuse, disclosure, destruction, modification or disruption.

Policy and governance

- A formal cybersecurity strategy is maintained by management and approved by the Risk Committee.
- Detailed cybersecurity policies are reviewed at least annually.
- Board oversight is led by the Risk Committee with at least quarterly security briefings from senior management.
- Service Organization Control (SOC2, type II) assessments are performed annually to produce independent verification and testing of ICE controls for external parties and auditors that

rely on ICE. The scope of these reports is evaluated each year and tailored in response to customer feedback and business developments. These reports are available to any customer via the Customer Third-Party Risk Management Portal.

- Periodic third-party assessments are conducted using the NIST Cybersecurity Framework to measure program maturity and completeness.
- We maintain insurance coverage that may, subject to the terms and conditions of the policy and payment of deductibles, cover certain aspects of cybersecurity issues.
- Reporting a security concern can be done easily from our website here.

Team

- The lead independent director of ICE's Board has expansive cybersecurity and risk expertise, including on the National Infrastructure Advisory Council (NIAC), a White House homeland defense initiative that protects information systems critical to the nation's infrastructure, where he served through 2020.
- A dedicated cybersecurity team is led by the Chief Information Security Officer, with specialized teams of subject matter expertise:
  - Digital forensics and incident response
  - Red team
  - Threat intelligence and cyber fraud
  - System engineering and automation
  - Governance, risk and compliance
  - Application security
  - Cloud security
- ICE's dedicated threat intelligence team monitors public and private sources of emerging threats and vulnerabilities, while also participating extensively in industry and government sponsored information-sharing groups to ensure awareness of ICE-specific and sector level threats.
- ICE requires ongoing training for Information Security staff to ensure fluency in their respective areas.

Employee training

- Information security is considered a core skillset and is part of every employee's annual performance review.
- Employees are required to complete extensive ICE-specific security awareness training upon hire and annually thereafter; training modules require employees to read and provide acknowledgement of the Corporate Information Security Policy.
- Phish testing campaigns are conducted each quarter with all employees.
- Information Security Assurance regularly conducts tests utilizing various methods, including advanced adversary simulations, to verify compliance with written polices and to assess vulnerabilities. In addition, ICE teams are subject to examinations from Enterprise Risk, Internal Audit and multiple international regulatory bodies.

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 and Sanctions Policy
- Business Gifts, Meals and Entertainment Policy

Code of conduct

Our Code of Business Conduct is an outline of 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 are making 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
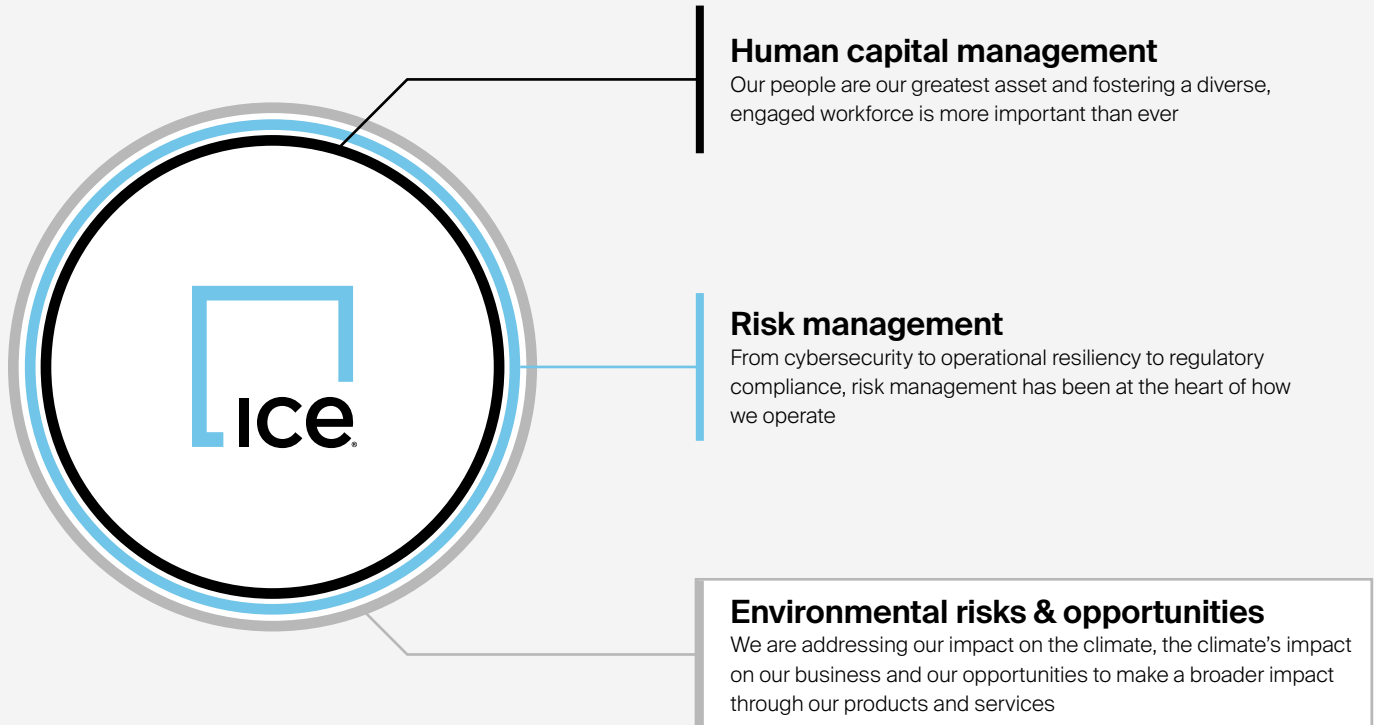- Fair competition
- Recordkeeping

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 must 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.

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

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

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

Environmental risks & opportunities

ICE is uniquely positioned to be a leader in the transition to a reimagined energy economy. We do that by responding to changing consumer and institutional preferences around energy consumption and associated trends in the market, and by offering risk management and hedging tools.

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

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

Decarbonization strategy

Our goal throughout our sustainability reporting, and most certainly as it relates to greenhouse gas emissions, is to be straightforward and factual in what we say and avoid overstating where we are in the process or over promise on what we think we can achieve. Our culture over our 23 years as a company has ingrained in us the value of thinking big, but setting realistic goals with clear steps in mind for how to achieve them.

Our goals

This is our third year disclosing greenhouse gas emissions and our second year including all Scope 1, 2 and relevant Scope 3 emissions. With a baseline for our full footprint established for 2021, we were able to focus on carbon reduction targets in 2022 which resulted in a commitment to work toward the reduction of Scope 1 and 2 emissions by 50% by 2032 from a 2021 baseline. This target aligns with the SBTi 1.5-degree methodology. As it relates to Scope 3, with more than 75% of our Scope 3 emissions in categories 1 and 2, supplier engagement is critical to any Scope 3 reduction targets we set. Putting in place a robust system to engage, manage and reduce our supply chain emissions is the first step toward setting a quantifiable target and is our focus in 2023.
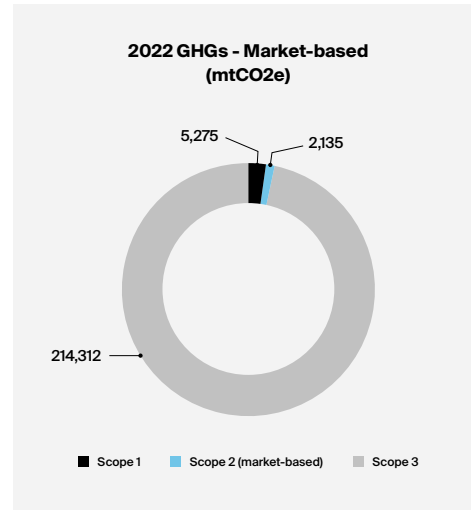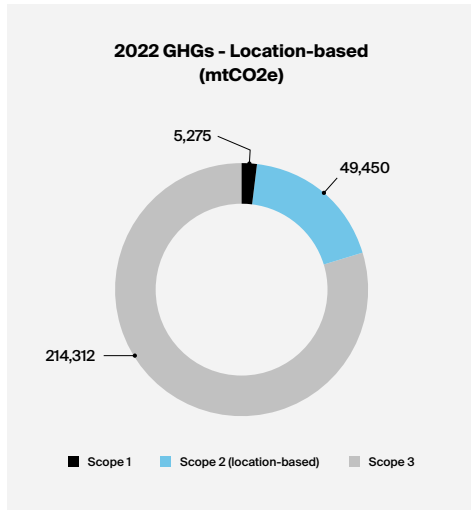
Carbon reduction targets:

Scope 1 and 2 - Commit to working toward the reduction of Scope 1 and 2 emissions by 50% by 2032 from a 2021 baseline. This target aligns with the SBTi 1.5-degree methodology.

GHG emissions footprint

Our calculations are performed using the GHG Protocol and with assistance from a third-party firm with expertise in this area. Additional details are provided in our Task Force on Climate-related Financial Disclosures (TCFD) report, which can be found in the Data and reporting frameworks 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.

2022 GHGs - Location-based (mtCO2e)

5,275
49,450
214,312

■ Scope 1   ■ Scope 2 (location-based)   ■ Scope 3

2022 GHGs - Market-based (mtCO2e)

5,275
2,135
214,312

■ Scope 1   ■ Scope 2 (market-based)   ■ Scope 3

Mitigation efforts

While we work toward our interim carbon reduction targets, we are taking steps available to us today to mitigate our current footprint, including the purchase of renewable energy certificates and carbon credits.

Renewable energy

- For all electricity consumed in our offices and data centers that is not coming directly from renewable sources, we have purchased Energy Attribute Certificates (EACs).
- EAC purchases for 2022 totaled 175,392 MWhs and include 142,799 vintage 2022 Green-e certified renewable energy certificates (RECs) for all electricity consumed in the US.
- The remaining EAC purchases were matched based on the country where the electricity was consumed and compliance year.

Carbon credits

We plan to purchase 7,410 tCO2e of registered and certified carbon credits to match all Scope 1 emissions and steam-based Scope 2 emissions. Additional details on those purchases will be included in our CDP report.

Actions planned

Over the past few years, we've made strides in the measurement and disclosure of our carbon emissions. In 2022 we set interim targets that we believe are achievable for Scope 1 and 2 emissions.

Scope 1 and 2

Our existing Scope 1 and 2 emissions are largely driven by electricity consumption related to our real estate footprint, particularly our data centers, which account for approximately 60% of our overall electricity use. We have a multi-prong approach to addressing this impact that includes increasing energy efficiency and facilitating renewable energy resources.

Energy efficiency

Data Centers

We focus our energy management program on our 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

Offices

We consider the environmental impact when leasing, designing and renovating buildings, including putting in place energy efficient systems and recycling waste materials from construction.

The vast bulk of our office footprint is leased, not owned. Two exceptions are our dual-headquarter locations in the US, based in Atlanta and New York.

After purchasing our Atlanta headquarters building in 2014, we initiated a major renovation that resulted in significantly enhanced energy efficiency throughout the building, including:

- LED and motion-sensor lighting, managed by more than 4,000 automatic lighting control devices, that helps reduce our power consumption on average 20% below the energy code allowance.
- Exterior facing stairwells that decrease use of elevators and associated electricity.
- Computerized HVAC controls and multiple air distribution zones on each floor that maximize tenant comfort, save energy and reduce waste.
- High efficiency fixtures and tankless water heaters that result in water conservation and reduced electrical loads.

We completed a restoration and renovation project of the iconic New York Stock Exchange building, located at 11 Wall Street, in 2017. Those updates included:

- Automated LED lighting control devices installed.
- Elevators retrofitted for greater efficiency.

In our leased locations, we consider energy efficiency when selecting space. Across our leased real estate footprint, at least five of our locations are Leadership in Energy and Environmental Design (LEED) certified, including buildings in Calgary, Chicago, Dublin, Hyderabad and New York.

Over the past few years, as we've begun collecting and reporting our greenhouse gas footprint, we have started a dialogue with our landlords around emissions, the focus of which has been on the measurement phase. Consistent with our Scope 1 and 2 carbon reduction targets, we will be engaging further on meaningful steps around reducing emissions and factoring it into future office space procurement decisions.

Renewable energy

All electricity consumed at our offices and data centers is either directly renewable or matched to the purchase of renewable energy certificates associated with the generation of renewable energy. As a next step, we are considering additional renewable energy procurement methods to meet our needs.

Remaining Scope 1 and 2

The remainder of our Scope 1 and 2 emissions, outside of location-based electricity, is driven by our real estate footprint, including steam, combustion and refrigerant related emissions at our offices and data centers. Our ability to reduce these emissions will be driven by (1) steps to consolidate our office footprint commensurate with our reduced need for office space in a hybrid work environment, (2) continued upgrades to building efficiency driven by regulations (e.g. voluntary and regulatory moves away from older refrigerant types), and (3) as needed, migrating to more efficient leased spaces over time.

SBTi

We have established our Scope 1 and 2 reduction targets in line with the Science Based Targets initiative (SBTi) 1.5-degree methodology; however, given SBTi does not allow for targets to be set for only Scope 1 and 2 for organizations with our Scope 3 footprint, we have not yet formally committed to SBTi based on ongoing work to assess our Scope 3 emissions. Additionally, because our steps to procure renewable energy through the EAC market began before we established our first full GHG baseline, in line with the SBTi framework, the purchase of renewable energy credits that began in 2020 is not counted toward our Scope 1 and 2 reduction targets. For these targets, we will focus on reductions that can be made outside of electricity consumption, such as those mentioned in the previous section.

While we are fully focused on our current emissions footprint, the pending acquisition of Black Knight could require us to reset our baseline and would likely impact our strategy. We plan to provide updates on the impact to our strategy in future reports.

Scope 3

Categories 1 and 2 account for more than 75% of our Scope 3 emissions, making supplier engagement critical for any Scope 3 reduction targets we set. We are focused in 2023 on building a robust system to engage, manage and reduce our supply chain emissions as a first step toward setting a quantifiable target.

Based on our initial assessments, reaching an SBTi Scope 3 target (such as 67% of our supply chain by emissions committed to SBTi) would require engagement, and potentially the replacement of, more than 300 suppliers. We are currently doing additional analysis to fully understand the implications and have taken initial steps toward a framework to support the work that will be needed.

Governance

Governance of our carbon reduction targets 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.

The impact of climate change on 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; and
- 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 our TCFD report, located in the Data and reporting frameworks section of this report.

Our opportunity to make a broader impact through ESG products and services

ICE's sustainable finance products and services offer customers data, tools and markets that provide transparency into risks and opportunities to enable sustainable decision-making and include:

- Global environmental markets
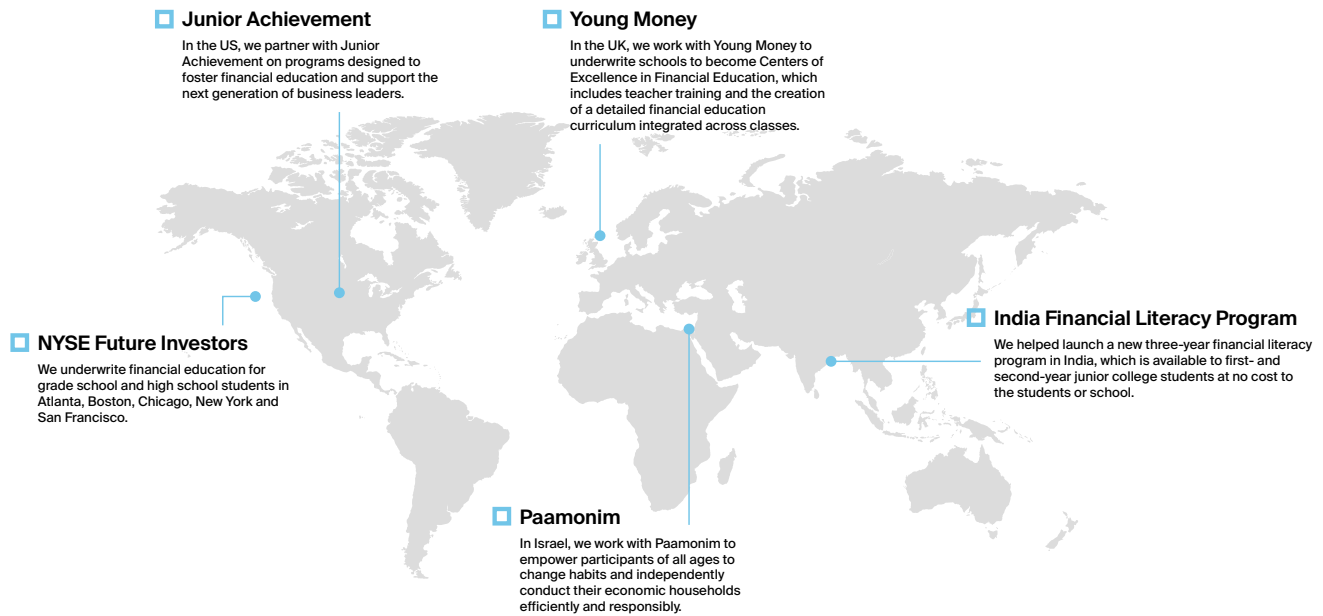- Data, indices and analytics
- NYSE issuer engagement

A comprehensive list of these products and services is available in our TCFD report, located in the Data and reporting frameworks section of this report.

Financial inclusion

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 programs

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.

Junior Achievement
In the US, we partner with Junior Achievement on programs designed to foster financial education and support the next generation of business leaders.

Young Money
In the UK, we work with Young Money to underwrite schools to become Centers of Excellence in Financial Education, which includes teacher training and the creation of a detailed financial education curriculum integrated across classes.

NYSE Future Investors
We underwrite financial education for grade school and high school students in Atlanta, Boston, Chicago, New York and San Francisco.

India Financial Literacy Program
We helped launch a new three-year financial literacy program in India, which is available to first- and second-year junior college students at no cost to the students or school.

Paamonim
In Israel, we work with Paamonim to empower participants of all ages to change habits and independently conduct their economic households efficiently and responsibly.

NYSE Future Investors program

We underwrite a financial education program operated by Everfi for grade school and high school students in Atlanta, Boston, Chicago, New York and San Francisco. The NYSE Future Investors program includes three sets of curricula: financial education basics for grade school students, advanced instruction on investing and markets for high school students and data science knowledge and skills for high school students.

2021-2022 school year results

6,900	63%	63%
Students received access to financial and data sciences education	Schools in low-to-moderate income school districts	Average increase in knowledge measured through pre- and post-testing

Grade school financial education

Financial education for grade school students focuses on foundational understanding of financial concepts. A baseline knowledge of how money works and how to use it sets students up for success as they learn about more complicated concepts in the future.

High school investment and markets education

This program takes students beyond individual financial decisions to introduce them to larger economic and market concepts. Students learn about individual investing and how their future investments impact, and are impacted by, the larger economy.

After completing the course, more students report feeling prepared to understand how the economy impacts them personally, how to decide when to invest, and feel better prepared to accomplish long-term financial goals in their adult lives.

Data science knowledge and skills

This program familiarizes students with a variety of modern data techniques and their applications. This curriculum is also a resource to help close the gender gap in data sciences. After taking this course, a greater percentage of female students showed increased interest in data visualization, predictive analytics and data mining.

India Financial Literacy Program

We helped launch a new three-year financial literacy program in India in 2022, which is available to first- and second-year junior college students at no cost to the students or school. The program aims to help students understand the importance of money, how to manage it, concepts of budgeting and saving and thus empower them to make informed choices. The activities under this program are designed to build awareness and provide necessary skills for application in day-to-day life as well as prepare students to take the National Financial Literacy assessment test.

Program goals

30	6,500	2,000+
Junior colleges in the Hyderabad, Ranga Reddy and Guntur regions	Students expected to be reached over course of three years	Students in program took the National Financial Literacy assessment test in 2023

Young Money

In the UK, we work with Young Money to underwrite schools to become Centers of Excellence in Financial Education, which includes teacher training and the creation of a detailed financial education curriculum integrated across classes.

The Centers of Excellence award is a nationally recognized award which accredits education providers across the UK for excellence in delivering financial education. Young Money is committed to helping education providers bring practical, effective and sustainable financial education to young people.

Young Money provides a center-wide improvement framework with one-on-one advice from an expert education consultant. The program is tailored to the individual needs of each center. Young people are placed firmly at the heart of the program, and their needs and interests drive and underpin the teaching of high-quality financial education.

Results to date

16	7,144	5
Schools funded by ICE	Students reached by 285 teachers delivering curriculum	Accreditation awards achieved to date

Two of the schools we fund were featured in a white paper on applied learning, which highlighted their work as examples of excellence in supporting young people in this area.
What Applied Learning Really Looks Like — The Entrepreneurs Network (tenentrepreneurs.org)

NYSE Bell podium access

Ringing the Bell at The New York Stock Exchange is a bucket list moment for many. But until recently, the Bell podium was only accessible by stairs. In a multi-year project that culminated in 2022, the facilities and building operations team at the NYSE completed work to make the podium fully accessible to guests, including those using a wheelchair.

On January 10, 2023, The New York Stock Exchange welcomed executives and guests of the NYC Department of Buildings, Milrose Consultants and John Gallin & Son, Inc., in celebration of the NYSE Podium Accessibility Project. To honor the occasion, John Raine, Manhattan Borough Commissioner and Nicholas Katsarelis, Assistant Plan Examiner, joined head of building operations at NYSE James Katsarelis to ring the Opening Bell. In this photo, Nicholas Katsarelis uses the new lift to reach the Bell podium.

Appendix: Data and reporting frameworks

This appendix includes data that we report in line with various sustainability reporting frameworks as well as additional detail on data referenced throughout this report.

Reporting below includes:

- Sustainable Accounting Standards Board (SASB) metrics.
- Task Force on Climate-related Financial Disclosures (TCFD) report.
- UN Sustainable Development Goals (SDGs) alignment.
- Employee data.

We also completed a CDP Climate Change Questionnaire in 2022, which is publicly available on the CDP's website, and intend to do so again in 2023.

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

Sustainable Accounting Standards Board (SASB) Metrics

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

Table 1. Sustainability Disclosure Topics & Accounting Metrics

Transparent & Efficient Capital Markets

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

	Number	Duration
Halt	News event trading halts: NYSE: 278 American: 43 Arca: 17	The duration of material news-related trading halts fluctuates on a case-by-case basis and can be anywhere from a few minutes to a few hours or even a few days.
Pause	LULDs (or single-stock circuit breakers): NYSE 761 Arca 192 American 311	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.

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

The NYSE Timely Alert procedures(1) for listed companies apply between the hours of 7:00 am ET and 4:00 pm ET. NYSE-listed companies are required to use any Regulation FD compliant disclosure method (2) to disseminate material news to the public (including foreign private issuers even though not subject to Regulation FD). Companies are required to follow the procedures below:
1. Between the hours of 7:00 am and 4:00 pm (3), companies are required to call the NYSE at least 10 minutes in advance of issuing material news or news that might impact trading in the company's securities. Outside of these hours, companies are not required to provide advance notice to the NYSE, but are encouraged to email a courtesy copy of the news if it is material.   2. When providing the 10-minute advance notice, companies should direct their call to the NYSE Market Watch team at 877.699.2578 or 212.656.5414. When calling, it is important that the company's representative be knowledgeable about the details of the news being issued.

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

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

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

Description of policy to encourage or require listed companies to publicly disclose environmental, social, and governance (ESG) information

FN-EX-410a.4

The NYSE provides resources and tools to encourage and help issuers determine the best path to ESG disclosure for their companies, including reporting guidance, working groups, webinars and a library of content. nyse.com/esg

Managing Conflicts of Interest

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

FN-EX-510a.1

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

Discussion of processes for identifying and assessing conflicts of interest

FN-EX-510a.2

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

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

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

Managing Business Continuity & Technology Risks

(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected

FN-EX-550a.2

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

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

FN-EX-550a.3

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

System Resiliency and Business Continuity Planning / Disaster Recovery

Our crisis management team handles our end-to-end response to any potential issues and regularly conducts global drills to ensure our processes are ready to be implemented. Our operations team maintains an incident management program to handle any incident with operational impact - security or otherwise. The goal of the incident management program is to provide a cohesive framework for the communication, resolution and recording of incidents and to ensure incidents are resolved in a planned and controlled manner so that any interruption is resolved quickly, and normal operations are restored.

- System resiliency and business continuity management is a core tenet of our system design process and redundancies are purpose-built into our applications, network infrastructure and across primary and backup data centers.
- Such design resiliency may include "hot/hot" system components with real-time failure capabilities, readily available back-up components, robust recovery and/or failover procedures, and geographically-diverse backup data centers. These geographically diverse "like for like" disaster recovery data centers are maintained and governed by an enterprise-wide policy. Per policy, all ICE core procedures, systems and operational tasks are duplicable in recovery facilities, exercised at least annually and documented comprehensively.
- Following each acquisition of a new company, this process is reviewed to ensure crisis management procedures are in place across our entire organization.
- Board oversight includes quarterly reports to the Risk Committee on technology operations and governance.
- Employees are trained annually on our business continuity procedures to ensure readiness and understanding.

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.

Policy and governance

- A formal cybersecurity strategy is maintained by management and approved by the Risk Committee.
- Detailed cybersecurity policies are reviewed at least annually. Board oversight is led by the Risk Committee with at least quarterly security briefings from senior management.
- Service Organization Control (SOC) audits (both SOC1 and SOC2 reports issued across various product offerings) are performed annually to produce independent verification and testing of ICE

controls for external parties and auditors that rely on ICE. The scope of these reports are evaluated each year and tailored in response to customer feedback and business developments.

- These reports are available to any customer via the TPRM Portal here: https://ice.safebase.us. If you have any questions about the reports or this process, please reach out to: ICE-ThirdPartyDueDiligence@ice.com.
- Periodic third-party assessments are conducted using the NIST Cybersecurity Framework to measure program maturity and completeness.
- We maintain insurance coverage that may, subject to the terms and conditions of the policy and payment of deductibles, cover certain aspects of cybersecurity issues.
- Reporting a security concern can be done easily from our website: ice.com/security.

Team

- The lead independent director of ICE's Board has expansive cybersecurity and risk expertise, including on the National Infrastructure Advisory Council (NIAC), a White House homeland defense initiative that protects information systems critical to the nation's infrastructure, where he served through 2020.
- A dedicated cybersecurity team is led by the Chief Information Security Officer, with specialized teams of subject matter expertise:
  – Digital forensics and incident response
  – Red team
  – Threat intelligence and cyber fraud
  – System architecture and automation
  – Governance, risk and compliance
  – Application security
  – Cloud security
- ICE has a dedicated threat intelligence team monitoring public and private sources of emerging threats and vulnerabilities, while also participating extensively in industry and government sponsored information-sharing groups to ensure awareness of ICE-specific and sector level threats.
- ICE requires ongoing training for Information Security staff to ensure fluency in their respective areas.

Employee training

- Information security is considered a core skillset and is part of every employee's annual performance review.
- Employees are required to complete extensive security awareness training upon hire and annually thereafter; training modules require employees to read and provide acknowledgement of the Corporate Information Security Policy.
- Email phish testing campaigns are conducted each quarter with all employees.
- Information Security Assurance regularly conducts tests utilizing various methods to verify compliance with written polices and to assess vulnerabilities. In addition, ICE teams are subject to examinations from Enterprise Risk, Internal Audit, and multiple international regulatory bodies.

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 are (1) foreign nationals and (2) located offshore

TC-SI-330a.1

(1) 8% of our employees are on a Visa
(2) 44% of our employees are based outside the United States

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 US and UK employee populations in the Data and reporting frameworks 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: ice.com/investor-resources/supplemental-information/default.aspx and daily volumes here: ice.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: ice.com/investor-resources/supplemental-information/default.aspx and daily volumes here: ice.com/marketdata/reports/176

Taskforce on Climate-Related Financial Disclosures

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. The team implemented that framework in collaboration with leadership across our organization to identify, assess, and manage climate risks and opportunities.

Additionally, ICE has a Sustainability Governance Committee comprised of senior Company officials including our President, Chief Financial Officer, Corporate Risk Officer, Human Resources Officer, Chief Regulatory Officer, General Counsel, Vice President of Corporate Affairs & Sustainability and the Presidents of our individual businesses. This committee is singularly focused on advising the Company in managing enterprise-wide sustainability risks and opportunities. Analysis from

Enterprise Risk Management, along with input from other corporate departments, is provided to the Sustainability Governance Committee in furtherance of its aim to provide a holistic climate change risk management approach to ICE. Our sustainability efforts are coordinated by the Company's Vice President of Sustainability, an office that we created to advance the Company's commitment to achieving our own sustainability-related initiatives.

ICE's collaborative nature is distinctly embodied in our sustainability approach. 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, 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 regularly assess the physical security and resiliency of our systems and geographic locations to continue to meet the needs of our stakeholders and customers even if we face a variety of potential hazards. Additionally, we have designated a President for Sustainable Finance products companywide to guide and further reinforce our overall strategy.

> 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 ("we" or "the Company") 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: 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: Physical, which focuses on potential impacts to ICE's operations or to our stakeholders resulting from acute weather events; and Transitional, which centers around evolving impacts to demand for different products as the economy transitions towards net zero greenhouse gas emissions.

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 Vendor Management, 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.

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 an overview of our commodity market solutions.

While ICE's environmental markets fulfill an array of our customer's 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 an overview of our commercial offerings.

Impact of climate-related risks and opportunities, 10K 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 2022 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.

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[1] 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. TTF is a virtual trading point for natural gas in the Netherlands, and its revenues have grown 37% on average over the last five years.

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.

[1] International Energy Agency Stated Policy Scenario (STEPS), Announced Pledges Case (APC), and Net Zero Emissions for 2050 Scenario, New Zero by 2050, A Roadmap for the Global Energy Sector, published May 2021.

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 approximately 40% of ICE transactional energy product revenues in 2022.

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. 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 and 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 its own strategy and operations to continue to safeguard ICE's position as an all-weather company.

Metrics and targets

Transitional Risks

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

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

Physical Risks

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

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

Greenhouse gas emissions (tCO2e)

Metrics	Activity	2020	2021	2022
Scope 1	Fuel use (stationary)	191	2,389	3,567
	Fuel use (mobile)	958	1,010	1,501
	Refrigerants	1,968	1,854	207
Total Scope 1		**3,117**	**5,253**	**5,275**
Scope 2	Electricity	50,452	51,154	47,315
	Steam	2,110	5,533	2,135
Total Scope 2 (location-based)		**52,562**	**56,686**	**49,450**
Total Scope 2 (market-based)		**2,110**	**5,533**	**2,135**
Scope 3				
Category 1	Purchased goods and services	Not calculated	154,977	155,284
Category 2	Capital goods	Not calculated	57,543	26,578
Category 3	Fuel and energy-related activities	14,675	17,994	17,209
Category 5	Waste	484	880	868
Category 6	Business travel	906	1,374	6,389
Category 7	Employee commuting	2,996	2,179	4,682
Category 15	Investments	Not calculated	4,822	3,302
Total Scope 3		**19,061**	**239,769**	**214,312**
Total Scope 1, 2 and 3 (location-based)		**74,740**	**301,708**	**261,581**
Total Scope 1, 2 and 3 (market-based)		**24,288**	**250,555**	**221,723**

[1] All emissions reported in tCO2e

[2] Scope 3, 9, 10, 11, 12, 13 and 14 deemed not relevant. Categories 4 and 8 are wholly included in Scope 1 and 2 emissions.

[3] Certain 2020 and 2021 figures restated to account for refinement to estimation methodologies used in prior years. Restatements have an approximately 5% impact on total reported emissions. Additional carbon credits will be purchased to match restated figures.

[4] Our Scope 3 total for 2020 did not include categories 1, 2 and 15.

Mitigation

We purchase renewable energy certificates and facilitate the carbon credit market to offset our footprint.

Renewable energy

- For all electricity consumed in our offices and data centers that is not coming directly from renewable sources, we have purchased Energy Attribute Certificates (EACs).
- EAC purchases for 2022 totaled 175,392 MWhs and include 142,799 vintage 2022 Green-e certified renewable energy certificates (RECs) for all electricity consumed in the US.
- The remaining EAC purchases were matched based on the country where the electricity was consumed and compliance year.

Carbon credits

- We plan to purchase 7,410 tCO2e of registered and certified carbon credits to match all Scope 1 emissions and steam-based Scope 2 emissions. Additional details on those purchases will be included in our CDP report.

Reduction targets

- Commit to working toward the reduction of Scope 1 and 2 emissions by 50% by 2032 from a 2021 baseline. This target aligns with the SBTi 1.5 degree methodology.
- Supply chain engagement - With more than 75% of our Scope 3 emissions in categories 1 and 2, supplier engagement is critical to any Scope 3 reduction targets we set. Putting in place a robust system to engage, manage and reduce our supply chain emissions is the first step toward setting a quantifiable target and is our focus in 2023.

Additional detail on our decarbonization plan is available in the Decarbonization strategy section of this report.

Appendix A: Global environmental markets

ICE has been a leader in environmental markets for nearly two decades. Today our environmental markets are the world's most liquid. Our range of products are integral to valuing externalities and balancing the world's finite carbon budget to meet a 1.5°C pathway to limit climate change.

ICE helps clients navigate the long-term transition to less carbon-intensive fuels with our environmental markets, derivatives and carbon indices. Robust environmental markets facilitate the transition to cleaner fuels by placing a cost on carbon emissions and a value on carbon removal and reduction.

Since launch, allowances equivalent to over 115 billion tons of carbon, over 350 million renewable energy certificates, 6 billion carbon credits, and the equivalent of over 5 billion Renewable Identification Numbers have traded on ICE.

Negative externalities

As the world's leading environmental marketplace, ICE supports government-mandated cap-and-trade markets through our auctions and secondary futures markets.

- **European Emissions Trading** – The EU Emissions Trading System (EU 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 EU allowances.
- **UK Emissions Trading** – The UK launched an emissions trading system (UK ETS) in 2021 to replace the country's participation in the EU 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 UK.
- **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 US 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 US. 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 are spurring innovation in the clean energy economy and creating green jobs in RGGI states. ICE Futures US lists futures and options contracts based on RGGI allowances.
- **Washington State's Cap-and-Invest Program** – In 2021 the Washington Legislature passed the Climate Commitment Act which established a comprehensive, market-based program to reduce carbon pollution and achieve greenhouse gas limits. The program launched in 2023. ICE Futures US lists a physically delivered futures contract which, if held to expiry, will deliver Washington carbon allowances into the cap and invest program.
- **ICE Carbon Index** – This index family is based on the four most actively traded carbon markets in the world: EU ETS, Western Climate Initiative, RGGI and UK 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

Examples of positive externalities include energy-efficiency improvements like increasing building insulation to reduce heat loss, or projects which restore land, like tree-planting in forests. Another example might be a wind or solar farm, where renewable energy is hitting the grid and potentially displacing a fossil fuel generator.

- **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.

- **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.

- **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 US 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 US.

- **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.

- **Renewable Identification Numbers** – The US 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 US 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 US, 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.

- **Natural asset companies** – To address the large and complex challenges of climate change and the transition to a more sustainable economy, NYSE and Intrinsic Exchange Group (IEG) are pioneering a new class of public company based on nature and the benefits that nature provides (termed ecosystem services). Natural Asset Companies will capture the intrinsic and productive value of nature and provide a store of value based on the vital assets that underpin our economy.

- **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 more than 4,500 PPA offers spanning 25 countries in North America and Europe. The platform also enables developers to sell projects to the buyers seeking to own and operate renewable energy projects.

- **Carbon credit auctions** – ICE brings price discovery and transparency to the carbon credit market by connecting a global network 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 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.

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. Our offering includes cross asset ESG data, climate analytics, regulatory solutions, ESG indices and various platforms and interfaces to help customers visualize and navigate the transition to a greener future.

Climate data

ICE Climate Data integrates climate data and analytics for corporates, municipals and mortgage-back securities, which can help investors and companies to identify, measure and understand physical climate and transition risks.

- **Physical risk data** – We apply geospatial climate, economic and demographic data to specific US municipalities, MBS pools, and related fixed income securities. This new level of transparency can help US municipal and RMBS and CMBS market participants inform their investment decisions on bonds or securities that may have high climate risk exposure in an existing portfolio.

- **Transition analytics data** – We provide sophisticated tools, data and analytics to help investors and corporates navigate current and potential transition risk within portfolios and loan books.

> ICE ESG Geo-Analyzer is a visualization and analytics solution that enables data-driven actionable insights for location-linked assets. Users can analyze climate and social features surrounding any specific location within the continental United States, regardless of the presence of any linked security. The Geo-Analyzer provides climate risk and demographic metrics at property-level. It can be used to analyze client provided locations, such as pre-securitized commercial properties, whole loan portfolios, and real estate holdings and their respective associated location-backed securities.

ESG Company Data

ICE's ESG Company Data provides granular data on companies that is collected and quality-controlled to offer continuously updated information on ESG 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.

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's Impact Bond Classification Service offers data that align with industry-recognized impact bond frameworks. Clients can supplement the Classification Service data with ICE's Impact Bond Use of Proceeds, which provides project details, proceeds allocation reports and impact reports.

Social impact data

ICE's Social Impact Data provides socioeconomic and demographic insight on the municipal bond and mortgage-backed security (MBS) markets, enhancing the decision-making process for investors as they execute sustainable and socially-conscious strategies. 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 communities with greater opportunity for improvement so that targeted investments can bring resources to vulnerable and marginalized communities - a key input to measuring and addressing progress on social and climate justice.

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 ESG factors, in addition to other criteria.

ICE partnered with MSCI to launch the first suite of futures referencing MSCI ESG and Climate indices, including MSCI Climate Paris Aligned Indices. MSCI ESG and Climate Index Futures are standardized contracts listed on ICE Futures US and tradable alongside the MSCI EM and MSCI EAFE futures.

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 is taken from our wider ESG Company Data service that captures over 550 company-reported data points from publicly-available sources and reports as well as ESG risk analysis based on data from our data collaborator, RepRisk. 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, ESG 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.

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:
- ESG advisory team.
- Company ESG Data Viewer - designed to help companies measure and benchmark their existing disclosures versus peers and industry.
- NYSE ESG Reporting Guidance.

- ESG best practices guides, topical research, and a weekly ESG-focused newsletter.
- Hosted ESG webinars and online resources.
- In-person and online networking opportunities connecting sustainability and stakeholder-communications-focused experts within NYSE-listed companies.
- NYSE Sustainability Advisory Council - launched in 2022 to highlight and share best practices in ESG and sustainability from NYSE-listed companies across all industries (press release).
- IR Services program to help companies deliver their ESG message to investors.

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 ESG issues. The council includes representation from sustainability veterans overseeing leading disclosure programs from a broad range of sectors.

NYSE Board Advisory Council

In 2019, the NYSE Board Advisory Council 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.
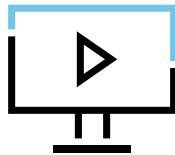
NYSE Board Advisory Council Highlights

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 council hosts a series of live events designed to connect diverse candidates to NYSE-listed companies seeking to refresh their boards.

The council's efforts have yielded more than 500 meetings between board leaders and diverse candidates since its inception. Our candidate pool has grown to more than 500 and, to date, the council has helped place 35 diverse candidates on corporate boards.

NYSE Sustainability Leaders Summit

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

As we further develop and evolve our sustainability strategy, 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. See the Financial Inclusion section of this report for more detail.
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 and inclusion 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**	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 ESG reporting guidance as well as resources and platforms for dialogue between issuers and investors. We are also members of: ■ UN Sustainable Stock Exchange Initiative and derivatives network ■ ICMA Sustainable Finance Committee Working Group ■ 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

All data in this section is from 2022, covers our global employee base and does not include contractors or contingent workers, unless indicated otherwise.

Global employees	
8,911	
US	4,973
EMEA, APAC and India	3,938
U.S.	
New York	1,261
Georgia	1,147
California	879
Massachusetts	305
Illinois	267
EMEA, APAC and India	
India	2,159
UK	788
Continental Europe	418
Annual voluntary turnover	
2022	14.2%
2021	10.5%
2020	5.5%
2019	8.3%
2018	9.4%
2017	7.7%

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%

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

Diversity data

Board

Total number of directors	
10	
Gender	
Female	6
Male	4
Race / ethnicity	
Black	2
Hispanic / Latino	0
Asian	1
White	6
Other	1

As of May 19, 2023

U.S. Employees				
	Officers	**Executives**	**Management**	**Staff**
Female	27%	24%	30%	32%
Male	73%	76%	70%	68%
Black	3%	4%	5%	9%
Hispanic or Latino	2%	3%	4%	6%
Asian	15%	23%	36%	33%
White	79%	67%	52%	48%
All other	1%	3%	3%	4%

UK Employees				
	Officers	**Executives**	**Management**	**Staff**
Female	30%	21%	29%	30%
Male	70%	79%	71%	70%
Black	0%	3%	4%	6%
Hispanic or Latino	N/A	N/A	N/A	N/A
Asian	0%	25%	31%	40%
White	90%	69%	60%	49%
All other	10%	3%	5%	5%

Global Officers	
Female	26%
Male	74%

Data as of January 1, 2023. Race / ethnicity categories and traditional gender categories of male and female are used to align with the US government reporting requirements. Additionally, UK definitions of race / ethnicity were mapped to align with the US government definitions to allow for globally consistent reporting.

Our US and UK-based employee population accounts for approximately 63% of our total employee population.