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2021 **Sustainability Report**

Published July 2022

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Letter from Chairman + CEO

How we all think about ESG continued to evolve in 2021 with organizations of all sizes, across industries, focusing on sustainability and the dividends it can pay beyond a company's bottom line. Companies' prospective and existing employees, investors and customers look at ESG factors when making employment, investment and purchasing decisions.

What we have also learned at ICE about ESG as we publish the seventh edition of this annual report is that the work is never done, and an ESG journey is a continuum. To that end, we've committed to continued progress in this area and, like years past, there are several updates to share.

Our efforts to add diverse Board members have resulted in a Board that is now 60% women and 30% persons of color. In addition to our goals to increase diversity throughout our employee population, we took the additional step this year of setting specific, timebound KPIs for certain segments that we believe will serve as a catalyst to increase diversity throughout our ranks.

We continue to expand and refine how we manage both our impact on the environment as well as the impact of climate change on our company. In this report, and the Task Force on Climate-related Financial Disclosures report that we are publishing with it, we provide additional metrics and analysis, both of which feed our thinking on carbon reduction targets.

Finally, we continue to expand our ESG products and services based on strong customer demand, and this report contains a summary of our sustainability offerings. We are in the unique position of not just offering ESG products, but educating and guiding issuers who are navigating their own ESG journey. Through the wide reach of the New York Stock Exchange, we provide resources and platforms for dialogue to help create more sustainable companies that deliver long-term benefits for all stakeholders.

As a result, a focus on ESG runs deep throughout our entire company. Thank you for your interest in this report, and for your continued engagement as we improve the organization for all stakeholders.



A stylized signature of Jeffrey C. Sprecher, consisting of a large, bold, black 'J' that curves upwards and to the right, followed by the letters 'EFF' in a bold, sans-serif font.

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

Approach

How we approach, manage and engage with our stakeholders on ESG

Purpose

We design, build and operate digital networks that provide transparency across asset classes to customers around the world. Through this work, we connect people to opportunity. That purpose extends to the internal management of sustainability initiatives and the related opportunities to make a difference in our business and for those ICE stakeholders impacted by our efforts. Our approach to actively manage ESG begins at the top of and extends throughout our organization.

Governance

Board of Directors

Our directors are focused on managing ESG 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 ESG goals ([NCGC Charter](#)). The Nominating and Corporate Governance Committee reviews ESG matters at two or more meetings each year.

In addition to the mandate of the Nominating and Corporate Governance Committee, important aspects of ESG management 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

Management

Our overall strategy is guided by an ESG Governance Committee comprised of senior officials from across the company, including the:

- President
- Chief Financial Officer
- Chief Regulatory Officer
- General Counsel
- Corporate Risk Officer
- Human Resources Officer
- President of the New York Stock Exchange
- President of Fixed Income & Data Services
- President of ICE Futures US
- President of ICE Futures Europe
- President of ICE Mortgage Technology

This committee meets quarterly and communicates frequently to assess ESG risks and opportunities across the company. Our internal approach to sustainability and ESG disclosure is coordinated by our Vice President of Sustainability.

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

ICE has also developed a Sustainable Finance Product Steering Committee, which meets regularly to deliver on its mission to provide innovative market tools to help drive progress toward global climate and other sustainability goals. Additionally, we have designated a President for ESG products company-wide to guide and further reinforce our overall strategy.

We also have dedicated resources to advise and support NYSE-listed companies as they work to increase and improve ESG disclosures, in addition to initiatives to increase board diversity and the sharing of best practices throughout the NYSE-listed community of more than 2,000 companies.

Stakeholder engagement

To ensure we fully understand the views of our stakeholders, we worked with a third-party consultant to conduct a formal materiality analysis in 2021 to gather feedback from our employees, customers, investors, suppliers and communities. In line with best practices, we plan to refresh the exercise on a regular basis. The results were consistent with our assessments of which ESG issues are of the highest importance to our business and stakeholders and are summarized below.

Tier 1: Prioritize

Areas deemed to present the greatest risks and opportunities for our business

- Human capital management
- Diversity and inclusion of employees and board
- Continued development of environmental markets
- Climate risks, GHG disclosures, reduction targets¹
- Cybersecurity and data protection
- Risk management and business continuity

Tier 2: Manage

Areas of critical importance but that do not pose outside risk or opportunity

- Employee wellbeing, health and safety
- ESG governance
- Lobbying, advocacy and policy influence
- NYSE issuer ESG engagement
- Executive compensation and incentives
- Supply chain: environmental impact¹

Tier 3: Monitor

Areas that are important, but less relevant for our specific business and industry

- Supply chain: social standards
- Water and waste
- Community engagement

¹ Based on ongoing conversations with our stakeholders, developments in our management of GHGs and proposed SEC regulations, we moved these items to a higher tier on an interim basis. We expect to confirm the update in our next formal assessment exercise.

This report is organized consistent with these findings including an in-depth update on the Tier 1 items starting on page 7.

Supply chain management

In addition to the actions we take within our own business, we monitor the impact we can have through our supply chain, including:

- **Vendor Onboarding** – Through our vendor onboarding and assessment processes we are collecting ESG data points to inform our decision making. This includes efforts to track and expand our spend with diverse-owned businesses and assess efforts by our vendors to measure and reduce carbon emissions. We are still in the early stages and are actively working to build out the appropriate framework.
- **Code of Conduct** – Our business partners and third parties are an extension of our organization. We expect that our suppliers, agents and business partners will follow ethical standards similar to our own when working with us or on our behalf. This means that we will consider terminating contracts with vendors or partners that do not strive to meet our high standards or contractual obligations.
- **Human Rights** – Our Modern Slavery Act Policy reflects our commitment to acting ethically and with integrity in all ICE business relationships, and to implementing and enforcing effective systems and controls to help ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Reporting

This report is our seventh annual sustainability report and is supplemented with additional data and narrative context, which is posted on our [website](#) and updated throughout the year.

This report covers calendar year 2021 across our approximately 9,000 employees who are based in roughly 50 cities and 20 countries. In September of 2020, we acquired Ellie Mae, a mortgage technology company headquartered in California. Ellie Mae's operations were partially incorporated into our previous report and are fully incorporated into this report. In May of 2022, we announced an agreement to acquire Black Knight, a provider of integrated, innovative, mission-critical, high-performance software solutions, data and analytics to the U.S. mortgage and real estate markets. The acquisition is pending regulatory review as of publication of this report. Assuming the transaction is completed, Black Knight's operations will be incorporated into a future report following integration of the business.

We continue to leverage reporting standards such as the Taskforce on Climate-related Financial Disclosures (TCFD), Sustainable Accounting Standards Board (SASB) and the UN Sustainable Development Goals (SDGs) to provide data and benchmarks that can be compared to our sector peers on a like-for-like basis. With each reporting standard we review the data and the standards on an annual basis for necessary updates.

Reporting standards →

We also closely follow proposed rulemakings on climate disclosure issued by the Securities and Exchange Commission as well as work underway by the IFRS to create global sustainability accounting standards under the auspice of the International Sustainability Standards Board (ISSB). We support efforts to streamline reporting standards and look forward to contributing to those efforts through various feedback channels.

Updates and new developments

New in 2021

Each year we evolve our reporting to better meet the needs of our stakeholders and encompass the ESG items of greatest significance to our company. In 2021, new developments included:

Sustainable Accounting Standards Board (SASB)

In addition to reporting SASB-aligned metrics for the Equity and Commodity Exchange sector, we added several reporting metrics to this report from the IT Services and Software standard.

[More →](#)

Task Force on Climate-related Financial Disclosures (TCFD)

Following the inclusion of initial TCFD-aligned reporting in our sustainability report last year, we expanded our reporting this year to a separate stand-alone TCFD report. The expanded TCFD report includes additional disclosures related to our management of climate-related risks, our governance structures for overseeing both risk management and strategic opportunities, as well as scenario-based analysis and corporate metrics and targets for measuring our success against climate goals.

[More →](#)

Carbon Disclosure Project (CDP)

We are in the process of completing CDP's Climate Change Questionnaire and expect to make our first comprehensive submission in 2022.

Greenhouse gas footprint

In our previous report we disclosed our full Scope 1 and 2 greenhouse gas emissions as well as categories 3, 5, 6 and 7 for Scope 3. This year we have completed our review of Scope 3 and added disclosure of categories 1, 2 and 15. Remaining Scope 3 categories 4, 8, 9, 10, 11, 12, 13 and 14 have been determined not relevant for our business.

[More →](#)

Scope 3	2020	2021
Category 1	–	✓
Category 2	–	✓
Category 3	✓	✓
Category 4	NA	NA
Category 5	✓	✓
Category 6	✓	✓
Category 7	✓	✓
Category 8	NA	NA
Category 9	NA	NA
Category 10	NA	NA
Category 11	NA	NA
Category 12	NA	NA
Category 13	NA	NA
Category 14	NA	NA
Category 15	–	✓

Diversity

In addition to our ongoing goal to increase diversity throughout our entire employee population, we took the additional step this year of setting specific, timebound KPIs for certain segments that we believe will serve as a catalyst to increase diversity throughout our ranks. At the Board level, our continued effort to add diverse members has resulted in a Board that is 60% women and 30% persons of color as of May 2022.

[More →](#)

Employee development

This report contains additional metrics and descriptions on the reach of our employee development programs, an area in which we have invested significantly over the past few years based on employee feedback. We have added dedicated positions to support employee development, expanded the scope and reach of our existing curriculum and created new programs based on employee demand.

[More →](#)

Areas of focus

Where we can make the biggest difference



As noted in the Approach section above, we conducted a formal materiality analysis last year to determine which ESG matters were considered most important to our key stakeholders. That exercise confirmed our view that, among the most critical ESG matters for both our business and our stakeholders, are human capital management, risk management and the opportunity to offer ESG products and services.

In this section of the report, we will focus on these three areas and provide an update on our current approach to each. There are additional items from our analysis that proved important to our business and stakeholders, and those are also covered elsewhere in this report and on our website.

Human capital management

Highly capable and engaged teams are critically important to our ability to grow and innovate. Through our human capital management efforts, we strive to attract and retain the best talent in the world. Our industry is competitive and the expectations are high. We offer pay for performance, a diverse and inclusive work environment, significant opportunities for career growth and a culture that prioritizes collaboration and drives results.

While human capital management encompasses a wide range of topics, in this report we focus on a few key issues that are driving our efforts around sustainability including diversity, employee development and employee engagement.

For additional data and context on human capital management and social topics please visit our website.

[More →](#)

Diversity

We continued to make strides toward increased diversity throughout our organization and broader community, including at the Board and senior management levels as well as throughout our ranks.

Employees

We are working to increase diversity across our employee population, and as a matter of transparency and accountability, have publicly disclosed our EEO-1 reports for the past four years.

[2018](#) → | [2019](#) → | [2020](#) → | [2021](#) →

Additionally, we publish diversity data for our US and UK employee populations using categories that more closely align to how we are organized:

US Employees

	Officers	Executives	Management	Staff
Gender				
Female	22%	26%	29%	31%
Male	78%	74%	71%	69%
Race / Ethnicity				
Black	3%	4%	4%	8%
Hispanic / Latino	4%	3%	5%	6%
Asian	10%	22%	32%	36%
White	83%	70%	57%	49%
Other	0%	1%	2%	1%

UK Employees

	Officers	Executives	Management	Staff
Gender				
Female	14%	19%	28%	28%
Male	86%	81%	72%	72%
Race / Ethnicity				
Black	0%	6%	4%	8%
Hispanic / Latino	N/A	N/A	N/A	N/A
Asian	0%	20%	17%	21%
White	100%	72%	75%	65%
Other	0%	2%	4%	6%

* Data as of November 15, 2021. Race / ethnicity categories and traditional gender categories of male and female are used to align with the U.S. 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 comprises approximately 70% of our total employee population.

*** This data includes employees from our acquisition of Ellie Mae; data reported in our 2020 Sustainability Report did not. Additional adjustments between categories are expected to be made as we further integrate job levels.

**** We plan to include global gender diversity metrics for officers in future reports.

Senior management

We recognize that change is often led from the top and to further drive our efforts throughout the organization, we have set specific, time-bound targets for increasing diversity in our senior ranks, including:

Gender	Race	Annual progress
Increase representation of female officers globally from 23% to 30% in five years.	Double representation of under-represented minorities* in our U.S. officer population from 6% to 12% in five years.	As we work toward these five-year goals, we commit to realizing linear increases.

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

Updates to our Board and senior management team over the past year have also led to increased diversity, including the appointment of Sharon Bowen as Chair of the New York Stock Exchange, the first woman and first Black person to serve in this role.



Bowen’s appointment as Chair of the New York Stock Exchange is the latest step in a series of groundbreaking career successes. From a longtime lawyer working on some of the world’s biggest deals, to a leading regulator in Washington, Bowen has achieved at the highest levels. Learn more about her career and how she uses her platform to lead on improving board diversity.

[Inside the ICE House podcast →](#)
[Taking Stock interview →](#)

Other updates resulted in an increase in female leadership across several operational roles, which today include:

- New York Stock Exchange Chair
- New York Stock Exchange President
- Fixed Income & Data Services President
- ICE Futures US President
- ICE Clear Europe President
- ICE Futures Singapore President
- ICE ESG President

Board

Continued refreshment of our Board with a reduction to 10 members in May 2022, has resulted in a makeup today that is 60% female and 30% persons of color.

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 2022

Employee development

Approach

Opportunities to develop the leadership, professional and technical skills of our employees has been a major focus for the past few years, with new and expanded opportunities each year. Our employee development programs fall into three categories:

- Training that is required at certain stages of an employee's journey
- Development opportunities that employees and managers can tap into to further their career and professional development
- Programs built to help employees understand our business, strategy and increase technical skillsets

Required training	Career and professional development	Job-related knowledge and skills
<p>All employees and contractors are required to complete training at least annually on several of our compliance, security, human resource and business continuity policies.</p> <p>All new hires are required to attend introductory sessions to learn about the full breadth of our business, as well as our culture, values and history.</p> <p>Employees hired into, or promoted to, manager, director and senior director positions are required to complete a series of courses focused on people management skills, HR policy, hiring, and unconscious bias, among other topics.</p>	<p>We offer several leadership development programs that employees can opt into or be nominated for. These programs include multiple sessions over the course of six months or more with a mix of assessments, third-party instruction, peer-learning discussions and presentations by internal subject matter experts.</p> <p>Employees at all levels can enroll in one-off or limited-series interactive sessions on a range of development topics throughout the year including: communication skills, emotional intelligence, teamwork, managing your personal brand, building credibility, preparing to lead and mapping your career.</p> <p>We have over 1,000 online courses available on-demand that cover topics from technical skills to soft skills.</p>	<p>Additional training programs are available, and in many cases mandated, for specific jobs that require technical training and product knowledge.</p> <p>Weekly and monthly educational sessions on a range of business initiatives are available globally via live webcast and archived for replay.</p> <p>Training playlists and curriculum have been developed and are constantly updated to provide in-depth understanding throughout our product and service offerings.</p>

Compliance training

All employees and contractors are required to complete training on our policies covering:

- Code of Conduct
- Anti-harassment
- Cybersecurity and data protection
- Business continuity planning and physical security procedures
- Trading policies

Additionally, relevant job types and business units are required to complete specific training that covers topics such as anti-money laundering, anti-bribery, hiring manager practices, data governance and regulatory compliance.

Talent development and retention

As a growth-oriented company that has diversified into new asset classes, ongoing investment in the development and retention of our employees is critical to our success. We view the value of our programs through two separate, but related, lenses: the impact on career growth, retention, and performance associated with our programs, as well as the benefits of bringing employees from across our organization together, whether virtually or in traditional classroom training, to build relationships that will lead to further collaboration across the business.

Our leadership development curriculum is tailored at each level to help leaders set direction and vision for their teams, create an engaging and inclusive work environment, model ICE's core values, and collaborate with others to drive innovation and problem solving for our customers. Programs include third-party vendor-led instruction, feedback and guidance from external coaches, peer learning, multi-rater (360) assessments and interactions with ICE senior leaders.

Metrics

We provide the below metrics to give additional insight into the scope and reach of our programs and the role they play. We caution that this data should be read in context, as it does not represent comprehensive or precise figures. Rather, it is based on currently available data across a mix of online and in-person platforms and incorporates some estimates and approximations. In 2021:

- 9,033 unique employees participated in one or more training programs
- More than 1,000 new hires completed our new hire business training sessions covering business, culture, values and history
- Approximately 650 employees hired into, promoted to, or in management roles completed multi-month programs covering people management competencies such as emotional intelligence, feedback and coaching, delegation and empowerment, driving innovation and change, leading virtually, building trust, managerial courage and performance management

Employee engagement

We use a mix of channels to gather input from employees throughout our organization. Formal methods include our biennial employee survey and an annual review process. These efforts are supplemented with occasional "pulse" surveys on specific topics. Additionally, we actively cultivate a work environment that encourages constant conversations across and within teams to provide informal and real-time feedback loops at all levels.

Employee survey

We conducted our biennial employee survey in November 2020 and plan to conduct another survey in the fall of 2022. Our survey measures how the core values that form the foundation of our culture are practiced, day in and day out. Participation in the 2020 survey was 71%, up from 60% in 2018. Overall employee engagement was 85%, measured by agreement with the commonly cited benchmark statement: "Overall, I would recommend ICE to a friend as a good place to work." On average, responses were overwhelmingly positive and reinforced our focus on areas such as employee development for continued investment.

Our core values



Integrity and professionalism

We hold ourselves and each other to the highest standards



Collaboration

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



Communication

We communicate clearly, constructively and frequently



Leadership

We lead by example



Problem-solving

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

Hybrid work environment

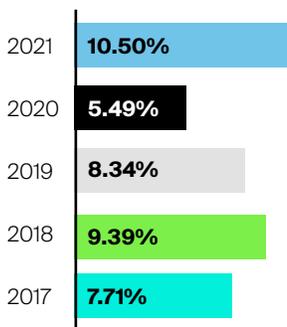
Following the onset of the COVID-19 pandemic and over two years of largely remote work for many of our employees, we know that new ways of working are possible and have adopted a tiered and flexible work arrangement policy. This new policy includes a mix of home-based, office-based and hybrid scenarios depending on the day-to-day function of the role and the extent to which each role manages people or teams.

This shift will require us to continue to refine and hone skills to engage remote teams and enable robust collaboration in a virtual environment. To do this, we have curated training resources that are available for all employees to help them better collaborate and manage in hybrid settings and are incorporating these skillsets on a permanent basis into our people management programs.

Turnover

As a result of our company’s M&A activity, we have seen significant increases and decreases in our headcount year to year related to acquisitions and divestitures.

As it relates to onboarding employees from M&A activity, our onboarding methodologies are similar to our new hire onboarding methodologies in that they address the wide spectrum of important topics ranging from learning about our business, understanding our culture, understanding our policies and making meaningful connections. Additionally, we pay close attention to our voluntary attrition rates and believe it’s an important indicator. In recent years, that rate has remained below relevant and comparable benchmark levels in both the finance and technology sectors:



Benefits

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

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.

Risk management

Business continuity

Our crisis management team handles our end-to-end response to any potential issues and regularly conducts global drills to ensure our processes are ready to be implemented. 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 tenant 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 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.
- Phish testing campaigns are conducted each quarter with all employees.

- Information Security Assurance regularly conducts tests utilizing various methods to verify compliance with written policies 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 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.

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

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

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.

Policies

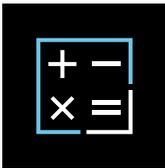
- Code of Business Conduct
- Personal Trading Policy
- Anti-Bribery Policy
- Reporting and Anti-Fraud Policy
- Anti-Money Laundering and Sanctions Policy
- Business Gifts, Meals and Entertainment Policy

Environmental risks and opportunities

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

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

Measuring, mitigating and reducing our impact on the climate and the potential for climate change to impact our business



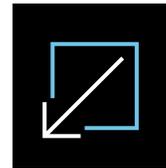
Measure

- Full Scope 1, 2, and 3 footprint
- GHG Protocol
- Operational boundary



Mitigate

- Electricity consumption 100% offset with EACs
- Certain emissions not generated from electricity offset with verified carbon credits
- Emissions associated with supply chain to be reduced via vendor engagement



Reduce

- Actively working to set reduction targets

We have refined and improved the measurement of our greenhouse gas footprint over the past few years and this year, for the first time, are reporting all relevant Scope 1, 2 and 3 emissions. Our calculations are performed using the GHG Protocol and with assistance from a third-party firm with expertise in this area. Details are provided in the table below as well as in our separate Task Force on Climate-related Financial Disclosures (TCFD) report.

Measure

Greenhouse Gas Emissions ¹			
Metrics	Activity	2020 Emissions	2021 Emissions
Scope 1	Fuel use (stationary)	958	1,010
	Fuel use (mobile)	191	2,384
	Refrigerants	3,419	3,018
Total		4,568	6,412
Scope 2	Electricity ²	49,990	46,164
	Steam	2,110	4,158
Total Scope 2 (location-based)		52,100	50,322
Total Scope 2 (market-based)		2,110³	4,158
Scope 3⁴			
Category 1	Purchased goods and services	Not calculated	154,977
Category 2	Capital goods	Not calculated	57,543
Category 3	Fuel and energy-related activities ⁵	14,675	5,114
Category 5	Waste generated in operations	484	795
Category 6	Business travel	906	1,374
Category 7	Employee commuting	2,996	2,179
Category 15	Investments	Not calculated	4,822
Total Scope 3		19,061	226,804
Total Scope 1, 2 and 3 (location-based)		75,729	283,538
Total Scope 1, 2 and 3 (market-based)		25,739³	237,374

¹ All emissions reported in tCO₂e

² Restated to include 1,647 tCO₂e from two facilities that were not included in reporting last year; 6,605 additional US Green-e Renewable Energy Certificates were purchased this year to account for omission

³ Restated to account for last year's purchase of Energy Attribute Certificates (EACs) to match electricity consumption at our offices and data centers

⁴ Scope 3 categories 4, 8, 9, 10, 11, 12, 13 and 14 deemed not relevant

⁵ Change year-over-year due to change from location-based to market-based methodology in 2021

Mitigate

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, we have purchased Energy Attribute Certificates (EACs).
- EAC purchases for 2021 total 186,149 and include 150,444 vintage 2021 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, with the exception of Singapore for which we purchased 2021 Malaysia RECs based on availability and Australia for which we purchased 2022 vintages based on availability.

Carbon credits

- We purchased carbon credits for all Scope 1 emissions, for steam-based Scope 2 emissions, and for all Scope 3 emissions except for those associated with categories 1 and 2.
- Carbon credit purchases were VCS registered and certified, totaled 25,000 tCO₂e, and included nature-based forestry projects located in Indonesia, Cambodia and the Democratic Republic of Congo facilitating reduced emissions from deforestation and degradation technology.
- To manage and reduce Scope 3 Category 1 and 2 emissions, we are focusing on managing our supply chain through engagement with our vendors.

Task Force on Climate-related Financial Disclosures (TCFD)

Additionally, we look closely at the potential impact of climate change to our operations and are using a Task Force on Climate-related Financial Disclosures style framework to assess those risks and opportunities. Last year we included TCFD-aligned reporting in our annual sustainability report; this year we published a more comprehensive standalone TCFD report.

[TCFD Report](#) →

Reduction targets

Having established our full emissions baseline using the GHG Protocol, including Scope 3, we are actively working to set reduction targets. We are working with a consultant to assess the options and determine the best path forward based on current best practices and developing regulatory requirements. We expect to communicate our intentions later in 2022.

Our opportunity to make an impact throughout our network

In addition to the steps we are taking above, we are also well-positioned to benefit from opportunities in this space and help make a broader difference across our network.

Our ESG products and services extend across our business and include:

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

Global environmental markets

The exchanges we operate globally play a critical role in helping investors and businesses make more sustainable decisions. Our products provide open markets, price discovery and transparency.

Robust environmental markets are critical to helping achieve net-zero greenhouse gas emissions. They facilitate the transition to cleaner fuels by placing a cost on carbon emissions and a value on carbon storage and capture. By attributing a value to the preservation and restoration of nature, environmental markets also support the creation of natural capital as an asset class. ICE has been a leader in environmental markets for nearly two decades. Today, our environmental markets span Europe, the UK and North America and are the world's most liquid environmental markets.

Carbon allowances

ICE supports government-mandated cap-and-trade markets through our auctions and secondary futures markets. A record total of 18 billion tons of carbon allowances traded on ICE exchanges in 2021, equivalent to an estimated \$1 trillion in notional value and equal to over half the world's estimated total annual energy-related emissions footprint.

- **European Emissions Trading** – The EU Emissions Trading System (EU ETS) is a cornerstone of the European Union's policy to combat climate change and is a key tool for reducing industrial greenhouse gas emissions cost-effectively. Being the first, and largest, international system for trading greenhouse gas emission allowances, the EU ETS covers approximately 10,000 facilities in the power sector and manufacturing industry, as well as airlines operating between EU countries. ICE Futures Europe lists futures and options contracts for EU allowances and in 2021 a record 15.2 billion EU carbon allowances were traded.
- **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.
- **California Cap-and-Trade Program** – 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 California's cap-and-trade program and in 2021 a record 2.4 billion California carbon allowances were traded.

- **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.

ICE Carbon Index

The ICE Carbon Index is based on the four most actively traded carbon markets in the world: the EU ETS, the Western Climate Initiative (California Cap and Trade Program), the RGGI, and the UK ETS. ICE also has a futures contract based on the index to provide exposure to the four largest cap-and-trade markets in the world in one financially settled instrument.

Carbon credits

- **Nature based futures** – 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 climate reduction.
- **Carbon Oversight Committee** – ICE Benchmark Administration is forming the ICE Carbon Oversight Committee to provide independent governance and oversight of ICE's activities in the voluntary carbon markets. This committee will advise on the criteria that carbon credits must meet to be sold through ICE's auctions. The committee's work is informed by the market principles that are being elaborated by the Integrity Council for the Voluntary Carbon Market.
- **Permian Global carbon auctions** – ICE plans to launch auctions for Permian Global's verified emission reduction certificates. These certificates represent quantifiable emissions that would have been released into the atmosphere had deforestation and forest degradation occurred. Each Permian Global project is verified against robust third-party forest carbon standards by independent expert auditors. This verification includes providing evidence of additionality that, without the project activity, the forest was at risk of deforestation or forest degradation; avoidance of leakage that the project activity has not displaced deforestation and hence emissions to another location; and permanence that the project and avoided emissions will not be reversed.

- **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 California's cap-and-trade program, offset credits can be used to partially meet obligations. ICE lists futures based on these credits to help entities under the cap to manage price and regulatory requirements.

Renewable energy certificates

Renewable Energy Certificates (RECs) are used to track and account for the use of renewable energy including for the purposes of state-administered programs that require electric utilities to use a prescribed amount of renewable energy. ICE Futures US launched REC futures and options contracts in 2009 and today has 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.

Biofuels

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

Renewable fuel standards

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.

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 provide an increasing range of low-carbon and renewable alternatives, which reduce petroleum dependency and achieve air quality benefits. ICE's LCFS futures help market participants allocate capital to emerging technologies and hedge compliance risk as well as provide price signals.

Solar

With the buildout of renewables in Texas, and demand for a solar product to cover the hours of the day with the highest solar production, ICE launched eight new ERCOT solar contracts in 2021 to help market participants manage price risk associated with the energy transition, similar to contracts ICE lists in the California energy markets.

Power purchase agreements

In October 2021, ICE invested in LevelTen, a marketplace for renewable energy power purchase agreements (PPAs). LevelTen provides access to more than 4,000 PPA offers spanning 21 countries in North America and Europe, the largest collection of PPAs in the world. The platform also enables developers to sell projects to the buyers seeking to own and operate renewable energy projects.

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 asset class 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.

Data, indices, analytics

As investors increasingly consider ESG factors in their capital allocation decisions, granular data is needed to inform these decisions. ICE provides data and analytics to measure performance, help manage risk, and support the flow of capital into more sustainable investments. Our offering includes ESG data, climate analytics, regulatory solutions and ESG indices.

ESG data

ICE's ESG data provides detailed ESG attributes and indicators that may be financially material - such as greenhouse gas emissions reported, board diversity, benefits, and workforce breakdown - sourced from both company and publicly-available third-party sources. ICE's ESG data coverage includes three million fixed income instruments (including corporate bonds, municipals and mortgage-backed securities).

Climate analytics

ICE climate data applies geospatial climate risk data to specific US municipal bonds, mortgage-backed securities (MBSs), and related fixed income securities. This level of transparency helps market participants assess the impact of physical and transition risks on US municipal bonds and MBSs.

Social impact analytics

As interest in ESG grows, market participants are seeking to better understand the potential social impact of their investment. ICE's Social Impact Scores provide socioeconomic and demographic data on the municipal bond and MBS markets, enhancing the decision-making process for investors as they execute their sustainable and socially-conscious investing strategies. The scores quantify the potential social impact of a financial investment in a community and help identify targeted investments that can bring resources to vulnerable and marginalized communities - a key input to measuring and addressing progress on social and climate justice.

Impact bond data

Impact bonds are typically issued in alignment with a recognized framework from bodies such as ICMA or Climate Bonds Initiative. ICE has four impact bond type classifications and supporting data is available via our reference data solution. Bond characteristics are collected from available bond prospectuses and external agency validation of the status is identified and supplied. Coverage includes green bonds, social bonds, sustainable bonds and sustainability-linked bonds.

Regulatory data

The EU's SFDR aims to standardize and modernize ESG-related disclosures by asset managers to improve comparability between funds. To help aid in compliance with SFDR, ICE offers the SFDR Principle Adverse Impact solution. Provided in conjunction with RepRisk, an ESG data science company, ICE offers continuously updated input values for mandatory corporate and sovereign SFDR indicators and can provide optional indicators.

Sustainability indices

Our index business has a range of solutions including fixed income sustainable benchmarks that account for ESG factors and including:

- Corporate fixed income ESG Indices
- Global Government Carbon Reduction Indices
- The ICE BofA Green Index
- ICE Carbon Index

ICE has also worked with MSCI to launch futures referencing MSCI ESG and climate indices.

NYSE issuer engagement

To help issuers navigate the rapidly-changing ESG landscape, the NYSE provides a range of resources and programs to educate, share best practices and contribute to the expansion of sustainability practices that create value for shareholders and other stakeholders. Specific programs include:

- ESG Advisory team
- 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 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
- IR Services program to help companies deliver their ESG message to investors

NYSE Board Advisory Council

In 2019, the NYSE Board Advisory Council launched an initiative to 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.

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 nearly 300, and more than 30 of our candidates have joined boards.

ESG Data

While this annual report serves as a progress update and checkpoint on top tier items, we are making strides throughout the year and rely on our website to provide more frequent and comprehensive reporting. The following are some of the additional data points and highlights you will find on our website.

[Read more about our work on sustainability →](#)

Environment

Our ability to make a difference includes the steps we take to mitigate the impact our operations have on the environment, the steps we take to manage the risk posed to our business by climate change, and the broad reach of our products and services across markets and data

- Offer ESG products and services to help our customers navigate a more sustainable future
- Disclose Scope 1, 2 and 3 greenhouse gas footprint using the GHG Protocol
- Purchase carbon credits to offset Scope 1 and certain Scope 2 and Scope 3 emissions
- Purchase renewable energy certificates to account for all electricity consumed in offices and data centers
- Manage Power Usage Efficiency associated with data centers
- Take steps when designing and renovating office space, including putting in place energy efficient systems and LED and motion-sensor lighting

[Read more about our commitments to environmental sustainability →](#)

Social

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

- Provide comprehensive and competitive benefits in each market we operate to ensure employees' health, well-being and financial security
- Act as an Equal Opportunity Employer with all qualified applicants receiving consideration without regard to race, color, religion, gender, sexual orientation, gender identity, national origin or ancestry, age, disability or veteran status, or other protected status
- Publish diversity metrics for our US and UK-based employees, including our annual EEO-1 data
- Make career development and training opportunities available throughout our employee ranks
- Monitor, and report annually, voluntary attrition rates; over the past five years, that rate has remained under the benchmark in the finance and technology sectors

- Underwrite financial education programs around the world and make charitable contributions in our communities, including through a \$5,000 annual match to every employee for accredited charities of their choice

[Read more about our human capital approach →](#)

Governance

We integrate ethics, compliance and accountability into all of our practices, starting at the top

- Diverse Board of Directors that includes six female directors (60%) and three directors who identify as persons of color (30%)
- Director skill sets cover a well-rounded range of topics
- All directors are elected annually by a majority vote standard
- Five out of 10 directors have a tenure of less than five years
- Director compensation is disclosed in the Proxy Statement
- The Board has oversight of ESG matters led by the Nominating and Corporate Governance Committee
- ESG KPIs are included in non-financial performance factors for CEO
- Formal limits are in place for the number of outside public company boards on which a director can sit
- No poison pill
- The Board of Directors is responsible for overseeing the risk management process, which is led by our Corporate Risk Officer
- We employ a three-lines model to enterprise risk management
- Our compliance policies are approved by the Board's Nominating and Corporate Governance Committee, reviewed regularly and assessed for effectiveness, and all employees and contractors are trained and tested annually
- Continued emphasis on shifting toward multi-year performance measures within equity compensation programs
- A robust compensation clawback policy
- Anti-hedging and anti-pledging policy requirements

[Read more about our approach to governance →](#)

Conclusion

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

Reporting Standards Appendix

We use reporting standards to provide consistent data and benchmarks that can be compared to our sector peers on a like-for-like basis. With each reporting standard we review the data and the standards on an annual basis for necessary updates.

Taskforce on Climate related Financial Disclosures (TCFD) →

We included TCFD-aligned reporting in our annual sustainability report issued in 2021; this year we are publishing our first standalone report with additional information.

UN Sustainable Development Goals (SDGs) →

We align our sustainability strategy to UN SDGs including climate action, gender equality and quality education.

Sustainable Accounting Standards Board (SASB) →

We reported SASB-aligned metrics for the Equity and Commodity Exchange sector in 2021; this year we've added several reporting metrics from the IT Services and Software category.

CDP

We are in the process of completing CDP's Climate Change Questionnaire and expect to make our first comprehensive submission in 2022.

Disclaimer and forward-looking statements

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