

 Nasdaq 2022

# Sustainability Report

Reimagining a  
More Sustainable  
Tomorrow

# Table of Contents



- [3 A Letter from the Chair & CEO](#)

---

- [4 About Nasdaq](#)

---

- [7 2022 in Review](#)

---

- [8 Our ESG Journey](#)

---

- [9 ESG Ratings](#)

---

- [10 ESG Governance](#)

---

- [11 Our ESG Reporting](#)

---

- [12 ESG Materiality Assessment](#)

---

- [15 Our Strategic Approach to Sustainability](#)

---

- [18 Our Support of the United Nations Sustainable Development Goals](#)

---

- [21 Sustainability-Linked Finance](#)

## 22 Solidify Our Business Resilience and Drive Sustainable Growth

<b>23</b>	<b>Environmental: Solidifying Our Commitment</b>
24	Decarbonization and Climate Strategy
33	Natural Resource Management
<b>34</b>	<b>Social: Solidifying Progress for All</b>
35	Diversity, Equity and Inclusion
36	Workforce
38	Human Capital Management
42	Employee Engagement and Satisfaction
45	Supplier Diversity
<b>46</b>	<b>Governance: Solidifying Corporate Excellence</b>
47	Corporate Governance
49	Corporate Behavior

## 61 Support Our Clients and Enable Positive Outcomes

<b>62</b>	<b>ESG Solutions: Supporting Our Clients</b>
63	ESG Products and Services
64	Supporting the Corporate Community
67	Supporting the Investment Community
72	Supporting Clients through Research and Education
<b>73</b>	<b>Community Engagement: Enabling Positive Outcomes</b>
74	Nasdaq Purpose
74	The Nasdaq Foundation
75	Nasdaq Entrepreneurial Center



## 76 Appendix

- [77 Environmental Data](#)

---

- [84 Social Data](#)

---

- [92 Governance Data](#)

---

- [93 Our Support of the United Nations Sustainable Development Goals](#)

---

- [94 Assurance Statement](#)

---

- [95 Additional Resources](#)

---

- [95 ESG Material Topics Glossary](#)



Adena Friedman  
Chair & CEO, Nasdaq

GRI 2-22  
WEF Core 1

## A Letter from the Chair & CEO

At Nasdaq, our position at the intersection of capital markets and technology allows us to approach environmental, social, and governance issues from a unique vantage point. It also provides us with an important role to support our clients' success across the global economy, acting as a bridge between key market constituents — from asset owners to corporates — as they navigate the complexity of an evolving ESG landscape.

Nasdaq's own corporate sustainability strategy is designed to solidify our business resilience. We are committed to advancing meaningful sustainability efforts to reverse the negative effects of climate change by minimizing our environmental footprint and delivering market-based innovations that support a net-zero future. We are also committed to deepening our culture of diversity, equity, and inclusion as we solidify our position as a destination for the world's leading talent, as well as continuing to lead with best practice governance policies.

Our efforts are producing tangible results. In 2022, we achieved carbon neutrality for the fifth year in a row, and our net-zero emissions targets were approved by the Science Based Targets initiative. We were also recognized by several third-party validators for our sustainability efforts and inclusive workplace policies. We expanded our community impact around the globe through the Nasdaq Foundation, establishing thoughtful partnerships aimed at diversifying entrepreneurship and creating accessible pathways to the wealth capital markets can create. Each of these efforts reflects our renewed corporate purpose: to advance economic progress for all.

The new organizational structure we implemented at the end of 2022 further strengthens our ability to create even greater impact. Our new divisional structure aligns our business more closely with the foundational shifts that will shape the global financial system over the decade ahead, including the modernization of markets, the development of a complex ESG ecosystem facing corporates and investors, and the increasing need within the financial system for advanced anti-financial crime technology.

We are investing in market infrastructure innovations to ensure that capital markets are resilient and can continue to power opportunity around the world. We are empowering our clients to navigate the capital markets and their own sustainability journeys more effectively. Additionally, we are driving the global fight against financial crime with a comprehensive suite of solutions designed to help us get ahead — and stay ahead — of those who seek to abuse the financial system for their own gain.

The pages that follow tell a more complete story about our achievements in 2022. But I am most inspired about what comes next. The most successful sustainability initiatives are those that can be upheld for the long-term, and the groundwork we laid in recent years will help us do just that. I am confident that we will continue to build on our momentum in 2023 and beyond — letting our past achievements fuel future successes and delivering even greater impact for our clients and for communities around the world.

Adena Friedman, Chair & CEO, Nasdaq

# About Nasdaq

## Core Purpose

We advance economic progress for all

## Long-Term Vision

We will be the trusted fabric of the global financial system

## Value Proposition

We deliver world-leading platforms that improve the liquidity, transparency and integrity of the global economy

Nasdaq, Inc. is a global technology company serving the capital markets and other industries. Our diverse offerings of data, analytics, software and services enable clients to optimize and execute their business vision with confidence.

In 2022, we announced and implemented a new organizational structure that aligns our businesses more closely to foundational shifts that are driving the evolution of the global financial system. In order to amplify our strategy, we aligned the Company more closely with evolving client needs. As a result, we have identified three new reporting segments: Market Platforms, Capital Access Platforms and

Anti-Financial Crime, which align to our new divisional structure. By aligning our business segments against these secular trends, including the development of the Environmental, Social and Governance (ESG) ecosystem, we aim to deliver more for our clients and increase growth across our key pillars of liquidity, transparency and integrity.

\$3.6B

Annual Net Revenues in 2022

"Net Revenues" are defined as revenues less transaction-based expenses



GRI 2 | GRI 2-1  
WEF Core 1

## Aligning to Secular Trends



### Market Modernization

Modernizing markets and their underlying infrastructure to amplify liquidity



### Development of ESG Ecosystem

Enhancing transparency by connecting corporates and investors



### Anti-Financial Crime

Maintaining a comprehensive Anti-Financial Crime Suite

Nasdaq operates in 26 countries across the world. We have significant operations (which we define as more than 200 employees in a location) in the

U.S., Canada, Sweden, Lithuania, India, Philippines, Australia and the United Kingdom. These eight locations comprise over 95% of our total employee population.

Nasdaq operates in

26

countries around the world



Headcount increased to 6,377 employees as of December 31, 2022, from 5,814 employees as of December 31, 2021 primarily due to the growth of our businesses.



6,377



Headcount as of December 31, 2022

5,814



Headcount as of December 31, 2021

4,830



Headcount as of December 31, 2020

# Innovation and Technology

We are a company of landmark beginnings, from launching the first electronic exchange in 1971 to migrating the first exchange to the cloud last year. We continue to reimagine technology to better serve global markets and our continued success relies on our commitment to embracing inclusive growth, driving innovation and empowering our employees. In order to rewrite the future, we must rewrite the way we work. We are confident in our new corporate structure and are incredibly energized by what lies ahead.

“Driving Innovation” is one of our foundational corporate values and one we encourage employees to live and breathe every day. We regularly conduct internal hackathons, ideathons and other crowdsourcing events to foster the growth of innovative ideas within our own organization. Our culture of innovation and technology leadership align to support progress for our stakeholders

“Driving Innovation” is one of our foundational corporate values and one we encourage employees to live and breathe every day.

at scale. We drive compelling value directly to clients while creating broad positive externalities. In December 2021, [we announced a multi-year partnership with Amazon Web Services](#) to accelerate Nasdaq’s cloud journey, and evolve our innovative technology to a modern, cloud-native blueprint and standardize the infrastructure of the world’s markets. See 'Market Platforms' on page 17 for more information on the first market migration of Nasdaq MRX which went live in 2022.

At the same time, we humbly recognize the contributions of the technology, business and regulatory partners that help make this possible. We are proud that our efforts have earned us recognition as one of 2023’s “Most Innovative Companies” by Fast Company and are committed to leading the shift to more sustainable and inclusive capital markets.

10K+	250+	1K+
Corporate Clients	Data Distribution Partners	Institutional Investors Served
75+	100M+	80
Exchange Platform Infrastructure Installations	Retail Investors Served	Carbon Removal Partners

**Recognized as one of 2023’s “Most Innovative Companies”**  
**Fast Company**

# 2022 in Review

**5** years of carbon neutrality

**6.8%** of addressable U.S. spend from diverse-owned suppliers

**2.3** percentage point increase in under-represented minority representation at the managerial level

## Net Zero

The Science Based Targets initiative (SBTi) verified and published our science-based targets to achieve net zero by 2050

**11%** growth in the number of sustainable debt instruments listed on Nasdaq Sustainable Debt Market

**4** diverse Directors added to Nasdaq's Exchange Board

Acquired

## Metrio

A Nasdaq Company  
a SaaS based ESG reporting and analytics platform

**2** diverse Members added to the Nasdaq Listing and Hearing Review Council

**100%** of our executive team participated in "Inclusive Leadership" training

**2,730** hours of employee Conscious Inclusion training

**8** additional LEED certifications for our offices

**213,932** CORCs issued by Puro.earth on behalf of suppliers

**#1** "Best Proxy Statement (Large Cap)" in *Corporate Secretary Magazine's* 2022 Corporate Governance Awards

## ESG Awards and Recognition

We are proud that our continued commitment to advancing our ESG objectives and initiatives has earned us recognition from leading ESG organizations. Select 2022-2023 ESG-related recognitions include:

Member of  
**Dow Jones Sustainability Indices**  
Powered by the S&P Global CSA  
7th consecutive year

**IR** magazine  
Award nominee  
US 2023  
Nominated for Best ESG Reporting



8 Green Business Certifications



GOVERNANCE, RISK AND COMPLIANCE  
**corporate secretary**  
"Best Proxy Statement 2022 (Large Cap) "

**parity.org**  
"Best Companies for Women to Advance"



Fast Company  
"Most Innovative Companies 2023"

# Our ESG Journey

1994

Established Nasdaq Foundation

2012

Became a founding partner of UN Sustainable Stock Exchange (SSE) initiative

Joined UN Global Compact

2015

Launched Nasdaq Sustainable Debt Market

2017

Published inaugural Sustainability Report

2018

Joined Climate Bonds Initiative's Partner Program

Achieved carbon neutrality for the first time

Formed Corporate ESG Steering Committee

2019

Launched Nasdaq ESG Advisory, Nasdaq Sustainable Bond Network and Nasdaq ESG Footprint

Signed "The Business Roundtable Statement on the Purpose of a Corporation"

2020

Launched Nasdaq ESG Hub

Acquired OneReport, an ESG data management, reporting, audit trail and disclosure software

eVestment launched ESG questionnaire

Produced inaugural Task Force on Climate-Related Financial Disclosures (TCFD) report

2021

Acquired majority stake in Puro.earth

Launched Green Equity Designation program

Board Diversity Rule approved by SEC

Established ESG Strategy and Reporting Team

Published inaugural SASB Index

Established mandatory diversity training for all managers

eVestment launched D&I questionnaire

Became UN PRI signatory

Reported against WEF's Stakeholder Capitalism Metrics for the first time

2022

Near-and long-term science-based targets approved by SBTi

Acquired Metrio, a SaaS based ESG analytics and reporting platform

Implemented Environmental Management System

Mapped alignment of corporate objectives to seven UN Sustainable Development Goals (SDGs)

Named to CDP Climate Change A List and CDP Supplier Engagement Leaderboard






Launched the Nasdaq Center for Board Excellence

Became Taskforce on Nature-Related Financial Disclosure (TNFD) Forum Member



# ESG Ratings

Nasdaq's ESG scores improved across multiple rating agencies in 2022, reflecting our continued commitment to advancing ESG best practices and providing stakeholders with timely and transparent ESG reporting.

Agency	Score Category	Current Score	Previous Score	Highlights	Score Range
	Overall Score	AA	BBB	Highest scoring range for Corporate Governance, placing us in the Leader category and indicating that our corporate governance practices are well aligned with shareholder interests	AAA - DDD
	Environmental	1	1	An Environmental QualityScore of 1 indicates a high level of environmental disclosure	1-10 (1=lowest risk)
	Social	1	1	A Social QualityScore of 1 indicates a high level of social disclosure	1-10 (1=lowest risk)
	Governance	1	1	A Governance QualityScore of 1 indicates a strong governance framework and low governance risk	1-10 (1=lowest risk)
	Overall Score	60	50	96th percentile Included in the Dow Jones Sustainability North America Index (DJSI) for the seventh consecutive year	0-100 (100 = best)
	Overall Score	A	B	Score is based on the comprehensiveness of disclosure, awareness and management of environmental risks and demonstration of environmental leadership CDP Climate Change A List — recognized for leadership in corporate transparency and performance on climate change	Range: A-D (A=Leadership)
	Overall Score	70 (Gold)	64 (Silver)	95th percentile Awarded EcoVadis Gold Medal	0-100 (100 = best)

Note: MSCI, ISS, CSA, CDP and EcoVadis ESG ratings are as of April 1, 2023. The use by Nasdaq of any MSCI ESG Research LLC or its affiliates ("MSCI") data and the use of the MSCI logos trademarks, service marks, or index names herein, do not constitute a sponsorship, endorsement, recommendation, or promotion of Nasdaq by MSCI. MSCI services and data are the property of MSCI or its information providers and are provided 'as-is' and without warranty. MSCI names and logos are trademarks or service marks of MSCI.

# ESG Governance

Our Board is committed to overseeing Nasdaq's integration of ESG principles and practices throughout the enterprise. Thirty-six percent of our Board nominees have experience with environmental and social matters (including human capital management), which strengthens our Board's review and oversight of our sustainability initiatives. The Board's Nominating & ESG Committee has formal responsibility and oversight for ESG policies and programs and receives regular reporting on key ESG-related matters.

Our internal Corporate ESG Steering Committee is co-chaired by executive leaders and is comprised of geographically diverse representatives from multiple business units. The Corporate ESG Steering Committee serves as the central coordinating body for our ESG strategy, and regularly reports that strategy to the Nominating and ESG Committee.

The Corporate ESG Strategy and Reporting Team, which ultimately reports to the Chief Financial Officer (CFO), is responsible for execution of our sustainability strategy; communicating our performance, metrics and ambitions through our annual Sustainability Report, TCFD Report and related ESG indexes filings and surveys and collaborating with various stakeholders across the organization to ensure a timely and accurate data gathering process.

36%

of our Board nominees have experience with environmental and social matters

GRI 2 | GRI 2-9 | GRI 2-12  
 WEF Core 2

## Our ESG Oversight Structure



## Our ESG Reporting

Throughout 2022, Nasdaq continued its commitment to advance our sustainability disclosures through enhanced and annualized ESG reporting. This commitment was reflected in score upgrades by several leading ESG rating agencies (pg. 9).

Accurate and transparent disclosure is a cornerstone of our ESG strategy. The data included in this report is as of December 31, 2022, unless otherwise noted. The data gathering process requires stakeholder engagement and validation across the organization. Where data was based on estimation or assumption, additional disclosure is provided as to conclusions reached.

Select environmental and social data disclosed in this report is externally verified to a limited level of assurance. See our 2022 Assurance Statement (pg. 94) for more details.

We report against the Global Reporting Initiative (GRI) framework and the Sustainability Accounting Standards Board (SASB) standard and the World Economic Forum’s (WEF) Stakeholder Capitalism Metrics. In addition, we publish a United Nations Global Compact Communication on Progress (UNGC CoP) annually.

We have published our third Task Force on Climate-related Financial Disclosures (TCFD) report. As part of that effort, we conducted a climate scenario analysis to evaluate climate-related risks and opportunities and their impact on our business over time. This analysis helped us assess our resiliency to climate-related risks, prioritize our mitigation strategies and enhance our identified transition opportunities. Furthermore, in 2022 we joined the Task Force on Nature-related Financial Disclosure (TNFD) Forum to support the development of the TNFD’s new disclosure framework focused on nature- and biodiversity-related risks and opportunities.

## ESG Memberships

Nasdaq’s representation and participation in a select group of ESG-related organizations supports our goal of consistent and transparent ESG reporting and leadership. Our association memberships represent a range of values that closely align with the values we deem essential. Some of our key memberships are on the right.



GRI 2-2 | GRI 2-3 | GRI 2-28  
 WEF Core 8  
 SDG 17



Explore our 2022 ESG reports and indexes:

- Summary Sustainability Report Microsite
- 2022 GRI Index
- 2022 TCFD Report
- 2022 SASB Index
- 2022 WEF Index
- ESG Resource Center

# ESG Materiality Assessment

We are committed to continuously advancing our longer-term ESG strategy, advocacy and oversight. We engage with internal and external stakeholders at all levels on ESG matters on an ongoing basis.

During 2022, we deepened our corporate and community ESG efforts, furthering our commitment to greater sustainability and climate change awareness. In addition to providing frequent and robust reporting on our ESG efforts and continuously working to identify emerging ESG trends, we encouraged our employees to participate in our ESG initiatives and engaged with our clients and stakeholders to pursue ESG-related opportunities and support the ESG progress of corporate issuers.

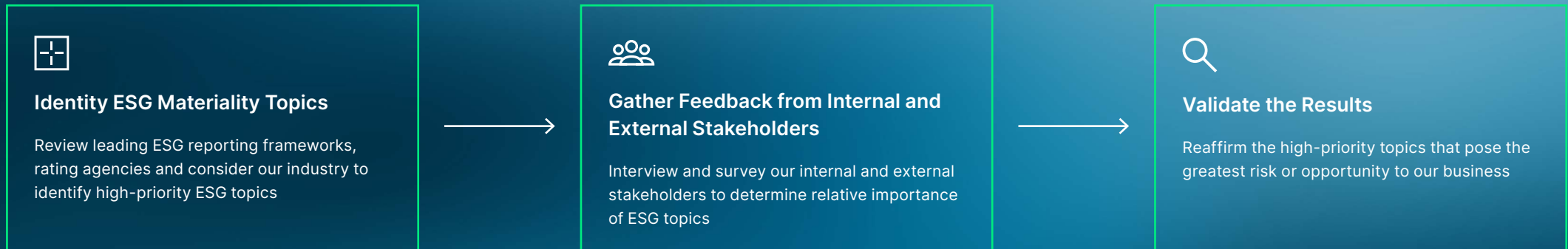
Nasdaq periodically conducts ESG materiality assessments<sup>1</sup> to identify and prioritize ESG topics that are influential on our business and important to our stakeholders. In 2022, facilitated by Nasdaq’s ESG Advisory team, we commenced an organization-wide assessment of Nasdaq’s priority ESG topics to inform our sustainability strategy and approach to ESG governance and reporting. This assessment weighed the potential relevance of a wide universe of topics identified as potentially impactful by leading ESG reporting frameworks, ratings and assessments, benchmarking exercises, surveys and interviews with internal and external stakeholders.

<sup>1</sup> References to materiality and similar terms refer to ESG topics that we have found to be relevant to our business based on our recent ESG materiality assessments. Such references to materiality are different and separate from how materiality is used and understood in the context of securities and other laws of the United States or as used in the context of financial statements and financial reporting. **ESG topics and issues described as material in this report may not be considered material for other reporting purposes.**

Twenty-one ESG-related topics were identified by the assessment to be relevant to Nasdaq’s business. The assessment determined that the 13 topics below are Nasdaq’s highest priority ESG-related topics:

- Data Privacy & Cybersecurity
- Risk Management
- Board Composition & Governance
- Business Ethics & Integrity
- Human Capital Management
- Anti-Financial Crime & Anti-Money Laundering
- ESG & Sustainable Finance Products
- Transparency & Reporting
- Employee Engagement & Satisfaction
- Diversity, Equity & Inclusion
- Customer Relationship Management
- Decarbonization & Climate Strategy
- Innovation & Technology

## Our Process



# ESG Materiality Matrix

IMPORTANCE TO OUR STAKEHOLDERS — INCREASING IMPORTANCE

## Priority ESG Topics

- Community Engagement
- Natural Resource Management

## High Priority ESG Topics

- Executive Compensation & Incentives
- Employee Health & Wellbeing
- Support for Small- & Medium-Sized Enterprises
- Policy Influence
- Labor Practices & Human Rights
- Supply Chain Responsibility

## Highest Priority ESG Topics

- Data Privacy & Cybersecurity
- Risk Management
- Board Composition & Governance
- Business Ethics & Integrity
- Human Capital Management
- Anti-Financial Crime & Anti-Money Laundering
- ESG & Sustainable Finance Products
- Transparency & Reporting
- Employee Engagement & Satisfaction
- Diversity, Equity & Inclusion
- Customer Relationship Management
- Decarbonization & Climate Strategy
- Innovation & Technology

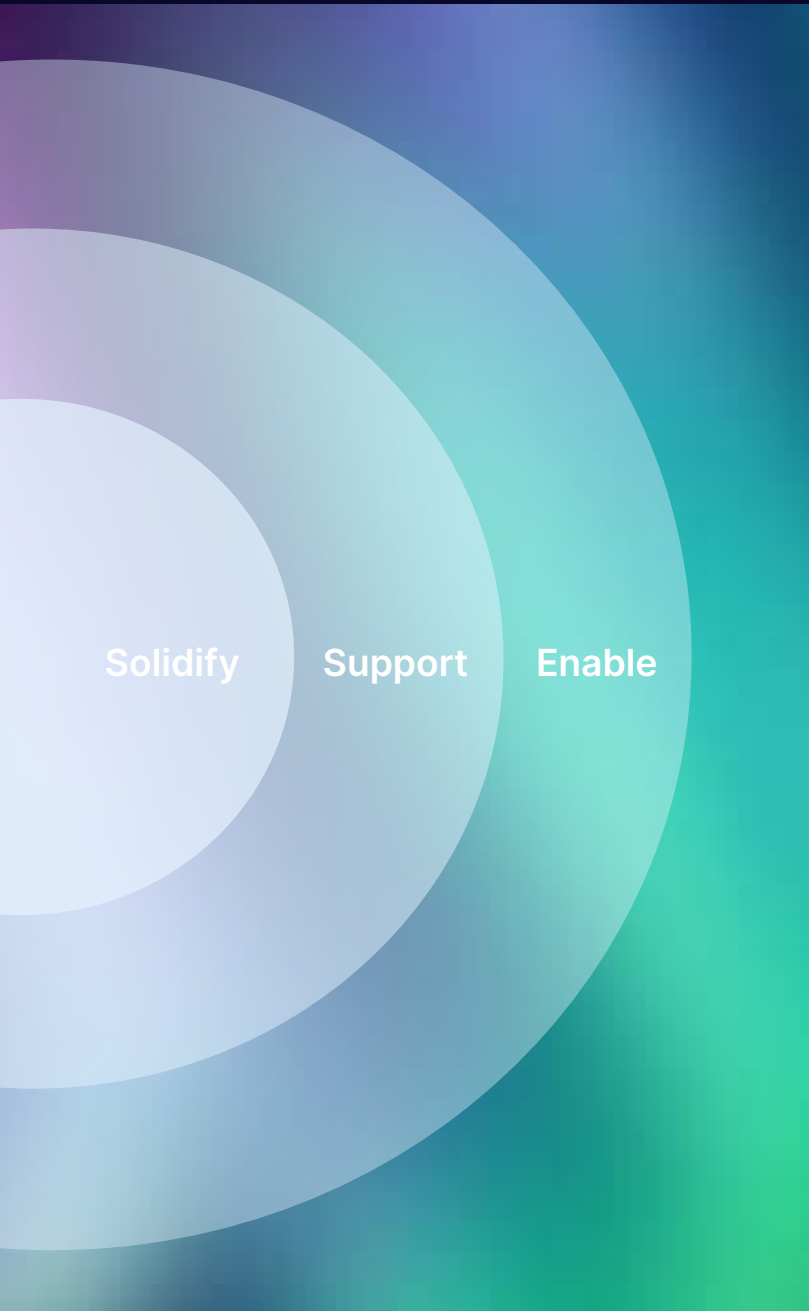
INFLUENCE ON OUR BUSINESS SUCCESS — INCREASING IMPORTANCE

# Stakeholder Engagement

As a signatory to the Business Roundtable [Statement on the Purpose of a Corporation](#) and supporter of the World Economic Forum's [Stakeholder Capitalism Metrics initiative](#), Nasdaq views accountability to our stakeholders as both a mark of good governance and a critical component of our operational success. We seek to manage our business with the goal of delivering sustainable, long-term value to a wide array of stakeholders, including our shareholders.

Throughout the year, we engage with a diverse set of stakeholders across a variety of ESG topics.

Stakeholder Groups	How We Engage	Topics of Interest Related to ESG
<b>Clients and Customers</b>	<ul style="list-style-type: none"> <li>• Conferences, workshops and meetings</li> <li>• Satisfaction surveys</li> <li>• Educational resources and tools</li> <li>• ESG products and advisory services</li> <li>• Investable indexes</li> </ul>	ESG indexes, asset managers' ESG investing policies and clients' strategies, board and management ESG oversight, ESG policy and program development and disclosure guidance
<b>Communities and Non-Governmental Organizations (NGOs)</b>	<ul style="list-style-type: none"> <li>• Nasdaq Purpose</li> <li>• Nasdaq Foundation</li> <li>• Nasdaq GoodWorks</li> <li>• Nasdaq Entrepreneurial Center</li> </ul>	Community outreach, employee volunteering and giving and resources for women and under-represented minority entrepreneurs and diverse investors
<b>Employees and Leadership</b>	<ul style="list-style-type: none"> <li>• Company intranet, meetings and town halls</li> <li>• Engagement surveys</li> <li>• Employee networks and focus groups</li> <li>• Training and development programs</li> <li>• Performance reviews</li> <li>• SpeakUp! Line (whistleblower)</li> <li>• Internal newsletters</li> </ul>	People and culture (including the alignment of our culture with our corporate strategy), effort to shape our corporate culture, succession planning, talent development, diversity, equity and inclusion initiatives and the future of work
<b>Executive Leadership</b>	<ul style="list-style-type: none"> <li>• Corporate ESG Steering Committee (executive leaders)</li> <li>• Nominating &amp; ESG Committee (Board members)</li> <li>• Management Compensation Committee (Board members)</li> </ul>	Ongoing discussions and decision-making related to all ESG topics, including Nasdaq's human capital management, Nasdaq's key environmental policies, programs and strategies and Nasdaq's ESG strategy and reporting
<b>Government and Regulators</b>	<ul style="list-style-type: none"> <li>• Public policy debates</li> <li>• Active education and engagement with elected leaders</li> <li>• Engagement through associations</li> </ul>	Nasdaq's advocacy focuses on policies affecting the capital markets
<b>Market Participants</b>	<ul style="list-style-type: none"> <li>• Investable indexes</li> <li>• Webinars, meetings and events</li> <li>• ESG data and analytics</li> <li>• Marketing</li> </ul>	ESG indexes, asset managers' ESG investing policies and strategies, ESG investing trends and ESG risk and portfolio impact for asset owners
<b>Shareholders</b>	<ul style="list-style-type: none"> <li>• Group calls, meetings and presentations</li> <li>• Investor roadshows and conferences</li> <li>• Annual Meeting of Shareholders</li> <li>• Engagement with investment stewardship teams</li> <li>• Investor perception study</li> </ul>	Investor ESG priorities, ESG policy and program development, ESG disclosure and people and culture



# Our Strategic Approach to Sustainability

Nasdaq’s approach to ESG is focused both internally and externally. Internally, we manage our businesses’ ESG-related risks and opportunities and the corresponding impact we have as an organization across our own operations. Externally, we focus on the impact we have on the world through our ESG-related products and services that support our clients’ objectives, as well as the wider economic and societal impact across other parts of our business and operations.

## Corporate Sustainability

### Solidify

*Solidify business resilience and drive sustainable growth by effectively managing and reducing long-term risks and advancing ESG practices across our entire organization*

#### Environmental

Reduce our environmental impact by addressing climate risk and reducing our environmental footprint

#### Social

Create a workplace culture of belonging and inclusion by attracting, training and retaining a diverse workforce

#### Governance

Maintain robust corporate governance policies and practices

## External Impact

### Support

*Support our clients by providing relevant insights and innovative technology designed to help them effectively navigate the evolving ESG ecosystem and minimize complexity and friction*

#### ESG Products and Services

Enable clients to effectively navigate the ESG ecosystem through our marketplace and technology solutions, reporting tools and data analytics capabilities

### Enable

*Enable positive outcomes through the economic and societal impact inherent to the solutions and services of our wider business operations*

#### Anti-Financial Crime

Address complex market and societal challenges through our comprehensive suite of solutions aimed at combating financial crime

#### Market Platforms

Modernize markets globally by providing exchanges, emerging marketplaces and other critical ecosystem participants in the capital markets with institutional-grade technology

#### Purpose

Drive impact across our community through our purpose-led initiatives to drive economic progress

## SOLIDIFY Our Resilience

From an organizational perspective, Nasdaq's approach to ESG is focused on solidifying our business resilience and driving sustainable growth by:

- minimizing our environmental footprint and focusing on market-led innovation towards a net-zero future;
- solidifying our position as a destination for talent, including through deepening our culture of diversity, equity and inclusion and building an organization that provides its people with the tools and platform to maximize their impact on the world; and
- continuing to lead in advancing governance best practices both as they relate to our own organization as well as supporting stakeholders across their ecosystems in advancing their governance practices.

## SUPPORT the Ecosystem

### *ESG Products and Services*

Nasdaq's position at the intersection of markets and technology provides us with a unique perspective on how the ESG ecosystem is evolving. It also offers compelling opportunities to support our clients as they navigate their own sustainability journeys through a suite of ESG-related solutions designed to minimize complexity and reduce friction.

Our ESG-focused capabilities suite encompasses a wide range of marketplace, technology, data & analytics products and solutions that clients leverage as they develop, execute and advance their own ESG strategies and platforms.

## ENABLE Positive Outcomes

### *Purpose*

Through Nasdaq's Purpose, we drive a comprehensive program that supports our overarching corporate purpose of advancing economic progress for all. As part of this strategy, Nasdaq's Purpose work is focused on reimagining investor engagement, diversifying entrepreneurship and fostering financial education and inclusion.



Nasdaq's position at the intersection of markets and technology provides us with a unique perspective on how the ESG ecosystem is evolving



**Anti-Financial Crime (AFC)**

Financial crime is a complex, global challenge that is fundamentally linked to deeper economic and societal challenges, ranging from poor investor education and limited banking options to terrorism financing and human trafficking. The United Nations estimates that up to \$2 trillion — or five percent of global GDP — is laundered by criminals each year. Through Nasdaq’s AFC Division and our acquisition of Verafin in 2021, we leverage the most innovative technology and capabilities to support financial institutions and the wider financial ecosystem in more effectively detecting and combatting financial crime. By increasing effectiveness in rooting out financial crime, our business drives positive economic and societal benefits associated with uncovering and mitigating the criminal activities that financial crimes support and finance.

We currently provide AFC solutions globally for more than 50 marketplaces, over 15 regulators and more than 2,300 financial institutions in North America. In 2022, we expanded the ability of financial institutions to detect financial crime by launching new capabilities in crypto and other digital assets. We also provided group and direct training to regulators and financial institutions on emerging behaviors such as fraud and market abuse in crypto products.

**Market Platforms**

Technology is the conduit to financial inclusivity and greater opportunities for all. In addition to owning and operating 18 exchanges in North America & the Nordics, the Market Platforms division provides exchanges, emerging marketplaces and other critical ecosystem participants in capital markets and digital assets with institutional-grade technology that is based on Nasdaq’s market expertise and road-tested technology. We modernize markets globally to drive sustainable and trusted financial networks

that successfully attract high quality and international liquidity, fuel job growth and advance economic progress.

Our marketplace technology is currently deployed in more than 25 emerging economies.

Through our majority stake ownership in Puro.earth, we lead the world’s first carbon crediting platform for engineered carbon removals, which brings suppliers of net-negative technologies together with companies with residual emissions. Aligned with our efforts to accelerate carbon markets’ maturity, in 2022 we [partnered with Singapore-based Climate Impact X](#) to provide trading technology that helps unlock price transparency and liquidity in the voluntary carbon market, empowering buyers to acquire high-quality carbon credits specific to their requirements. Furthermore, we initiated a partnership between Climate Impact X and Puro.earth to increase access to quality nature- and technology-based carbon removal credits to support the development of dynamic carbon portfolios and address growing demands in the voluntary carbon market.

To further our aim of modernizing infrastructure to meet the demands of tomorrow’s markets, in December 2021, we announced a multi-year partnership with Amazon Web Services to migrate our North American exchanges to the cloud. [The first market migration of Nasdaq MRX went live in 2022](#), with a 10% performance boost alongside high standards for resiliency, security and capacity. Nasdaq’s cloud migration will offer clients a migration blueprint enabling them to combine public cloud and edge computing to modernize their operations, improve agility and adjust to industry dynamics in their countries and regions. This is demonstrated through [our support of the Bolsa Electrónica de Chile’s \(Chilean Stock Exchange\) upgrade to move its operations to the cloud](#) via Nasdaq’s SaaS-based Marketplace Services Platform.

Provide Anti-Financial Crime solutions globally to:

50+	15+	2,300+
Marketplaces	Regulators	Financial institutions in North America

**Our marketplace technology is deployed in 25+ emerging economies**

We are committed to responsibly managing our business and operations to further advance the United Nations Sustainable Development Goals (SDGs). We have identified the following seven goals where we are likely to have the most direct impact given the nature of our business.



## Our Support of the United Nations Sustainable Development Goals

Nasdaq’s public commitment to sustainable development and socially responsible business practices began in 2012 at the Rio+20 conference, where Nasdaq was one of five founding signatories to the UN Sustainable Stock Exchange (SSE) Initiative. SSE is a peer-to-peer learning platform for exploring how exchanges, in collaboration with investors, regulators and companies, can enhance corporate transparency — and ultimately performance — on ESG issues and encourage sustainable investment. Since 2012, Nasdaq has also been a proud

participant of the United Nations Global Compact (UNGC), a non-binding pact that encourages businesses to adopt sustainable and socially responsible practices, report on their progress and advance the achievement of the [United Nations Sustainable Development Goals](#) (SDGs). The SDGs are 17 global goals and 169 targets adopted by all UN Member States in 2015 with the aim of achieving a better and more sustainable future for all. At Nasdaq, the SDGs help guide our sustainability strategy and connect our efforts to an ambitious global agenda.

In 2022, we conducted an assessment to identify the SDGs where we believe Nasdaq is likely to have the greatest impact. Leveraging SDG mapping and disclosure guidance from GRI, SASB, SSE and the UNGC, we assessed the alignment of the SDGs in relation to the high-priority topics identified in our ESG Materiality Assessment, our corporate ESG objectives and activities, our products and services and our industry. We identified and prioritized seven SDGs where we are likely to have the most direct impact. We are reporting our progress against our corporate and commercial objectives that support these seven SDGs.

SDG	Nasdaq's ESG Material Topics & Objectives	Nasdaq's SDG-Aligned Initiatives & Activities
<p><b>5</b> Gender Equality Achieve gender equality and empower all women and girls</p>	<ul style="list-style-type: none"> <li><b>Diversity, Equity, &amp; Inclusion</b></li> <li><b>Human Capital Management</b></li> <li><b>Labor Practices</b></li> </ul> <p><b>Objective:</b> Achieve greater balance of gender in our workforce <b>(SDG Target 5.5)</b></p> <ul style="list-style-type: none"> <li><b>Community Engagement</b></li> </ul> <p><b>Objective:</b> Address systemic barriers faced by under-represented communities in their efforts to generate and sustain wealth <b>(SDG Target 5.5)</b></p> <ul style="list-style-type: none"> <li><b>Transparency &amp; Reporting</b></li> </ul> <p><b>Objective:</b> Support listed companies through their implementation of Nasdaq’s Board Diversity Rule with outreach and education <b>(SDG Target 5.5)</b></p>	<ul style="list-style-type: none"> <li><b>Diversity, Equity &amp; Inclusion</b></li> <li>Increased percentage of women in the workforce</li> <li>Launched “Accelerate(Her)”, a program designed to develop female talent at Nasdaq</li> <li><b>The Nasdaq Foundation</b></li> <li>The New Investor Initiative is a portfolio of programs focused on tackling overlooked barriers for people of color, particularly women of color, to participate in the capital markets</li> <li>The Quarterly Grant Program provides a wide range of support for Black, Latino and Indigenous founders and entrepreneurs, with a strong focus on women</li> <li><b>Board Diversity Support</b></li> <li>Nasdaq has established relationships with 12 organizations to support Nasdaq-listed companies that choose to meet the recommended board diversity objective in their search for highly qualified, diverse, board-ready candidates</li> </ul>

SDG	Nasdaq's ESG Material Topics & Objectives	Nasdaq's SDG-Aligned Initiatives & Activities
<p><b>8</b></p> <p><b>Decent Work and Economic Growth</b> Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p>	<ul style="list-style-type: none"> <li><b>Support for Small- &amp; Medium-Sized Enterprises</b> <b>Objective:</b> Lead the shift towards more sustainable and inclusive capital markets (SDG Target 8.3)</li> </ul> <hr/> <ul style="list-style-type: none"> <li><b>Objective:</b> Improve inclusion, access, and knowledge in entrepreneurship (SDG Target 8.3)</li> </ul>	<p><b>Capital Access Platforms: Listings (U.S. &amp; Nordics)</b></p> <ul style="list-style-type: none"> <li>More than 500 companies currently listed on First North Growth Market in the Nordics</li> <li>Encourage growth of small- and medium-sized enterprises through all-inclusive fee structure</li> <li>Maintain largest percentage of small cap companies of any U.S. exchange (over 70%)</li> <li>Hosted 10 IPO-focused events, both in-person and virtual</li> </ul> <p><b>Nasdaq Entrepreneurial Center</b></p> <ul style="list-style-type: none"> <li>Provided more than 1,000 hours of education to over 18,000 entrepreneurs</li> <li>Supported small businesses in more than 80 emerging economies</li> </ul>
<p><b>9</b></p> <p><b>Industry, Innovation and Infrastructure</b> Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation</p>	<ul style="list-style-type: none"> <li><b>Innovation &amp; Technology</b></li> <li><b>Support for Small- &amp; Medium-Sized Enterprises</b> <b>Objective:</b> Modernize markets globally to drive sustainable and trusted financial networks that successfully attract international liquidity, fuel job growth and advance economic progress (SDG Targets 9.3 and 9.a)</li> </ul>	<p><b>Market Platforms: Marketplace Technology   European &amp; North American Trading Services</b></p> <ul style="list-style-type: none"> <li>Modernize infrastructure to meet the demands of tomorrow's markets</li> <li>Accelerate carbon markets' maturity</li> </ul>
<p><b>10</b></p> <p><b>Reduced Inequalities</b> Reduce inequality within and among countries</p>	<ul style="list-style-type: none"> <li><b>Diversity, Equity, &amp; Inclusion</b></li> <li><b>Human Capital Management</b> <b>Objective:</b> Achieve greater balance of gender, race and other underrepresented groups in our workforce composition at all levels (SDG Target 10.2)</li> </ul> <hr/> <ul style="list-style-type: none"> <li><b>Diversity, Equity, &amp; Inclusion</b> <b>Objective:</b> Become a partner of choice for diverse suppliers (SDG Target 10.2)</li> </ul> <hr/> <ul style="list-style-type: none"> <li><b>Community Engagement</b></li> <li><b>Support for Small &amp; Medium Sized Enterprises</b> <b>Objective:</b> Improve inclusion, access and knowledge in entrepreneurship (SDG Target 10.2)</li> </ul> <hr/> <ul style="list-style-type: none"> <li><b>Diversity, Equity, &amp; Inclusion</b> <b>Objective:</b> Support diversity and inclusion transparency across the institutional asset management landscape (SDG Target 10.2)</li> </ul> <hr/> <ul style="list-style-type: none"> <li><b>Anti-Financial Crime &amp; Anti-Money Laundering</b> <b>Objective:</b> Build a safer ecosystem that protects investors, communities and institutions from nefarious activity, helps fuel confidence in the system and creates equitable opportunities across a broader set of investors (SDG Target 10.5)</li> </ul>	<p><b>Diversity, Equity &amp; Inclusion</b></p> <ul style="list-style-type: none"> <li>Increased percentage of underrepresented groups in our workforce</li> <li>Graduated second cohort of the Emerging Leaders Program</li> </ul> <p><b>Supplier Diversity</b></p> <ul style="list-style-type: none"> <li>Achieved our goal of increasing the percent of addressable spend<sup>1</sup> from U.S.-based diverse-owned suppliers</li> <li>Added Sustainability-linked amendment to credit facility, reinforcing commitment to supplier diversity</li> </ul> <p><b>Nasdaq Entrepreneurial Center</b></p> <ul style="list-style-type: none"> <li>Served over 18,000 entrepreneurs – 70% minority founders and 69% female founders</li> </ul> <p><b>eVestment</b></p> <ul style="list-style-type: none"> <li>Launched the Diversity &amp; Inclusion (D&amp;I) questionnaire which gives asset managers an opportunity to provide narrative commentary on their firms' D&amp;I initiatives and, for those that permit such reporting, D&amp;I statistics on their portfolio team</li> </ul> <p><b>Anti-Financial Crime</b></p> <ul style="list-style-type: none"> <li>Improve the monitoring of global financial markets and institutions by providing advanced AFC solutions in fraud, AML, market abuse, detection and prevention</li> <li>Drive education of regulation and monitoring best practices for financial institutions and investors</li> </ul>

<sup>1</sup> "Addressable Spend" refers to Nasdaq's spending in which we have the discretion to directly select the provider of the goods and services and/or benefit from a sourcing event, including, for the avoidance of doubt, money that is directly spent by Nasdaq as well as money that is spent by one of Nasdaq's suppliers in relation to a contract or work authorization with or for Nasdaq.

SDG	Nasdaq's ESG Material Topics & Objectives	Nasdaq's SDG-Aligned Initiatives & Activities
<p><b>12</b></p> <p><b>Responsible Consumption and Production</b> Ensure sustainable consumption and production patterns</p>	<ul style="list-style-type: none"> <li>• <b>ESG &amp; Sustainable Finance Products</b> <b>Objective:</b> Support our clients as they manage climate risks, stakeholder engagement, and transparent reporting and disclosure <b>(SDG Target 12.6)</b></li> </ul>	<p><b>Capital Access Platforms: Corporate ESG Solutions</b></p> <ul style="list-style-type: none"> <li>• Nasdaq Listings (IPO) package, approved by SEC in 2021, provides newly public companies in the Nasdaq Global Select and the Nasdaq Global markets with complimentary sustainability reporting support</li> <li>• Launched the <a href="#">ESG Solutions Resource Center</a></li> </ul>
<p><b>13</b></p> <p><b>Climate Action</b> Take urgent action to combat climate change and its impacts</p>	<ul style="list-style-type: none"> <li>• <b>Decarbonization &amp; Climate Strategy</b> <b>Objective:</b> Support carbon neutrality and carbon net-zero programs <b>(SDG Target 13.2)</b></li> </ul> <p>.....</p> <p><b>Objective:</b> Encourage Nasdaq's suppliers to reduce their GHG emissions through CDP disclosure and setting science-based targets <b>(SDG Target 13.2)</b></p>	<p><b>Decarbonization &amp; Climate Strategy</b></p> <ul style="list-style-type: none"> <li>• Science-based targets were reviewed and approved by SBTi</li> <li>• Implemented Environmental Management System (EMS)</li> </ul> <p><b>Evaluating &amp; Engaging our Supply Chain</b></p> <ul style="list-style-type: none"> <li>• Engaged top suppliers to disclose their environmental data through CDP's Climate Change Survey, resulting in recognition and inclusion in CDP's Supplier Engagement Leaderboard</li> <li>• Added Sustainability-linked amendment to our credit facility, reinforcing commitment to supplier-focused science-based target</li> </ul>
	<ul style="list-style-type: none"> <li>• <b>ESG &amp; Sustainable Finance Products</b> <b>Objective:</b> Accelerating maturity of carbon and sustainability-related initiatives <b>(SDG Target 13.3)</b></li> </ul> <p>.....</p> <p><b>Objective:</b> Lead the shift towards more sustainable and inclusive capital markets <b>(SDG Target 13.3)</b></p>	<p><b>Market Platforms: European Trading Services</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Puro.earth</a>, the world's first carbon crediting platform for engineered carbon removals</li> <li>• <a href="#">Green Equity Designations</a> aims to enable visibility and transparency for investors with two voluntary designations</li> <li>• <a href="#">Nasdaq Sustainable Bond Network</a> Investor Portal connects issuers of environmental, social and sustainable bonds with investors</li> <li>• <a href="#">Nasdaq Sustainable Debt Markets</a> highlights sustainable investment opportunities to investors with a green, social or sustainable investment agenda</li> </ul>
	<p><b>Objective:</b> Lead the shift towards more sustainable and inclusive capital markets <b>(SDG Target 13.3)</b></p>	<p><b>Capital Access Platforms: Investment Intelligence</b></p> <ul style="list-style-type: none"> <li>• <a href="#">ESG Indexes</a> integrates ESG criteria into the index methodology, with some indexes designed purely as ESG and others designed with ESG criteria as an overlay to a broader investment thesis</li> <li>• Nasdaq's <a href="#">ESG Data Hub</a> offers investors and other stakeholders easy access to a wide range of unique and comprehensive ESG data sets</li> </ul>
<p><b>17</b></p> <p><b>Partnerships for the Goals</b> Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development</p>	<ul style="list-style-type: none"> <li>• <b>Community Engagement</b> <b>Objective:</b> Participate in, and represent Nasdaq with, key associations and partnerships to continue the effort on advancing our sustainability strategy, as well as for consistent and transparent ESG reporting <b>(SDG Target 17.16)</b></li> </ul>	<p><b>ESG Memberships</b></p> <ul style="list-style-type: none"> <li>• Business Roundtable (BRT) "Purpose of a Corporation"</li> <li>• CDP Supply Chain Global Sustainability Standards Board (GSSB)</li> <li>• Science Based Targets initiative (SBTi)</li> <li>• Task Force on Nature-Related Financial Disclosures (TNFD) Forum</li> <li>• United Nations Global Compact (UNGC)</li> <li>• United Nations Principles for Responsible Investment (PRI)</li> <li>• United Nations Sustainable Stock Exchange (SSE) Initiative</li> <li>• United Nations Sustainable Stock Exchange (SSE) Advisory Group on Carbon Markets</li> <li>• World Federation of Exchanges (WFE) – Sustainability Working Group</li> </ul>

# Sustainability-Linked Finance

On March 29, 2023, Nasdaq completed a sustainability-linked amendment to our \$1.25 billion revolving credit facility. The sustainability-linked credit facility amendment ties certain fees on the credit facility to Nasdaq’s performance against two ESG-related key performance indicators (KPIs) – one environmental and one social. Our borrowing costs may be increased, or decreased, depending on our achievement of each of the KPIs. Our environmental KPI reinforces Nasdaq’s commitment to SDG 13, “Climate Action” by encouraging our suppliers to set their own Science-based Targets to help address the global, existential issue of climate change. Our commitment to addressing SDG 10, “Reduced Inequalities”, was reinforced through our social KPI which focuses on increasing the percentage of our U.S. spend with diverse-owned suppliers to economically empower people of all backgrounds and support the communities we represent.



## Social KPI



**KPI:** Percent of Addressable Spend from U.S.-Based, Diverse-Owned Suppliers

**Description:** Percent of Nasdaq’s U.S. suppliers by spend covering purchased goods and services and capital goods from certified diverse-owned businesses

**Sustainability Performance Target:** Increase U.S.-based addressable spend from U.S.-based, diverse-owned suppliers by 0.5 percentage points annually for five years from a 2022 baseline of 6.8%



## Environmental KPI



**KPI:** Percent of Addressable Spend with Suppliers with Science-Based Targets

**Description:** Percent of Nasdaq’s suppliers by spend covering purchased goods and services and capital goods that set or commit to set science-based targets

**Sustainability Performance Target:** 70% of suppliers by spend covering purchased goods and services and capital goods will set or commit to setting science-based targets by 2027



**Solidify** Our Business  
Resilience and Drive  
Sustainable Growth

# Environmental: Solidifying Our Commitment



At Nasdaq, we are committed to advancing progress toward a net-zero future. In 2022, we achieved carbon neutrality for the fifth year in a row and our net-zero emissions targets were verified and approved by the Science Based Targets initiative, setting the roadmap for our near- and long-term emissions reduction strategy.

Our corporate sustainability strategy is driven by minimizing our climate impact and exposure to organizational climate risk. We remain focused on looking across our business to identify ways to bring measurable change to our climate impact. As we look ahead to 2023 and beyond, we are reaffirming our commitment to minimizing our environmental footprint and solidifying our business against long-term climate risks.

**Ann Dennison**  
Chief Financial Officer, Nasdaq

## 2022 Highlights

8

additional offices achieved green certification

84%

of our global energy consumption is procured through pre-negotiated renewable power contracts

## Net Zero

The SBTi verified and published our science-based targets to achieve net zero by 2050



Completed the implementation of a recognized international EMS for Nasdaq Real Estate & Data Center

37.9%

of our suppliers had set or committed to set science-based targets by the end of 2022



Achieved CDP climate A List and recognized by CDP for supplier engagement leadership



Taskforce on Nature-related Financial Disclosures

Became a TNFD Forum member

# Decarbonization and Climate Strategy

Nasdaq's climate strategy endeavors to reduce our greenhouse gas (GHG) emissions, mitigate our corporate climate and biodiversity risk exposure and promote awareness throughout our supply chain. This strategy is driven by our two separate but linked environmental programs:

- Carbon neutrality program: By calculating our annual carbon footprint, procuring renewable power and investing in high-quality carbon offsets, Nasdaq has achieved carbon neutrality for the fifth consecutive year.
- Carbon net-zero program: By driving initiatives that are designed to optimize and reduce emissions across Nasdaq's entire business operations and supply chain, we aim to achieve our short-term and long-term net-zero science-based targets, which have been verified and approved by the Science Based Targets initiative (SBTi).

In executing these programs, our focus is on:

- Solidifying our climate metrics and targets
- Reducing and neutralizing our GHG emissions
- Aligning corporate strategies to support reaching our net-zero targets
- Prioritizing natural resource management
- Evaluating and engaging our supply chain

## Solidifying Our Climate Metrics and Targets

The reduction of energy consumption, energy demand and corresponding GHG emissions throughout our business operations and supply chain is a high priority for Nasdaq. GHG emissions, which are related to energy consumption throughout the global organization, is an area that Nasdaq can control and impact through changes in operations, strategy and policies.

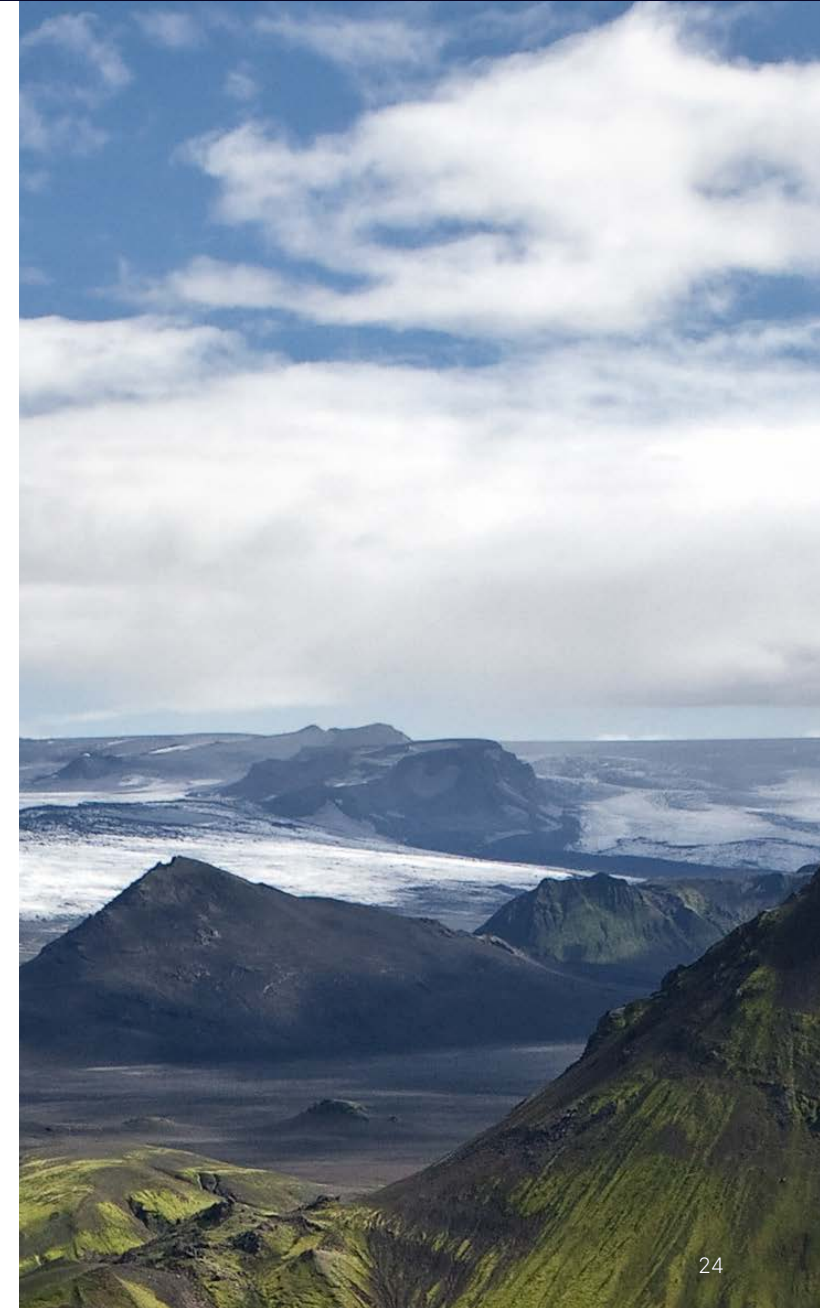
For the fifth consecutive year, Nasdaq has calculated its GHG emissions in line with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. A comprehensive review of Scope 1, Scope 2 and applicable upstream and downstream Scope 3 emissions has been performed and addressed. We continue to navigate and manage the evolving climate disclosure requirements and standards and continue to improve the quality of our data to be less reliant on assumptions.

The key priorities of our carbon neutrality and net-zero programs are to:

- reduce the energy consumption, corresponding GHG emissions and waste generation of our global operations through thoughtful sustainable initiatives and strategies;

- engage our value chain to report their relevant material GHG emissions and to set their own science-based targets;
- proactively procure renewable energy for our office space and data center portfolio;
- purchase Renewable Energy Certificates (RECs) from projects that are less than five years old and feed power into the same energy distribution network as our operations to replace any fossil fuel electricity power consumed (indirectly mitigating the release of GHG into the atmosphere); and
- purchase high-quality, nature-based Carbon Offsets from projects that focus on carbon removal or biodiversity to neutralize the associated GHG emissions related to our Scope 1 and Scope 3 categories (indirectly mitigating the release of GHG into the atmosphere) to achieve carbon neutrality.

In a continuous effort to drive our emissions down and contribute to a more sustainable world, Nasdaq has executed the initiatives on the following pages.





# Science-Based Targets



In 2022, our near- and long-term science-based emission reduction targets were approved by SBTi. In addition, SBTi verified and published our 2050 net-zero science-based target.

Our validated science-based targets are the focus of our net-zero program. We are

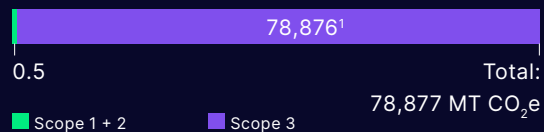
implementing multiple programs that will drive down our GHG emissions as we work to achieve these ambitious targets. This program works in parallel with our carbon neutrality program. As we reduce our overall GHG emissions, we also aim to neutralize the remaining emissions as we work towards becoming a net-zero company.



## Our Climate Strategy

2021

Our Baseline  
Absolute market-based GHG emissions



<sup>1</sup> 2021 GHG emissions were recalculated to add Category 3 and Category 8 in order to align to our SBTi-approved base year.

2027

70%

of our suppliers by spend will set their own science-based targets by 2027

2030

100%

reduction of our absolute Scope 1 and Scope 2 emissions

50%

reduction of our absolute Scope 3 emissions

100%

renewable electricity through 2030

2050

Net Zero

100%

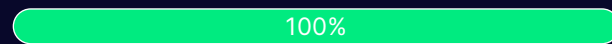
maintain a minimum of 100% absolute Scope 1 and 2 emissions reduction

95%

reduction of our absolute Scope 3 emissions



Continue to procure 100% renewable electricity



GRI 305  
WEF Core 8



Suppliers that have set or committed to set science-based targets



2022

2027

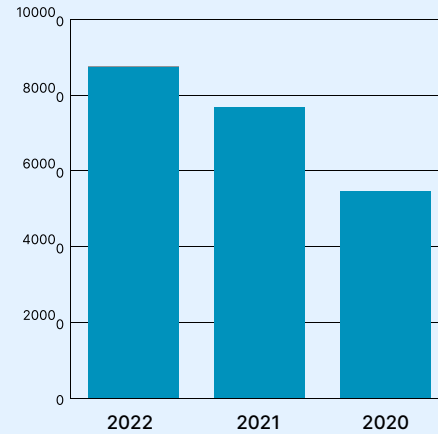
# Our GHG Emissions

The charts on the right summarize the global data for Nasdaq's office space, data centers, onsite combustion, upstream goods and services, capital goods, fuel and energy related activities, waste generation and recycling/compost diversion, business travel, employee commuting, upstream and downstream leased assets and investments for the reporting period January 1, 2022 through December 31, 2022.

The charts on the right also reflect a further breakdown by category of our Scope 1, Scope 2 and Scope 3 emissions, with the following methodology enhancements from our 2021 report, due to improved transparency of data:

- **Scope 1:** moved corporate card gasoline purchases from Scope 3 to Scope 1
- **Scope 2:** included steam and district heating, resulting in an increase in market-based emissions
- **Scope 3:** included acquisitional operational data from Verafin (acquired 2021) and Metrio (acquired 2022)

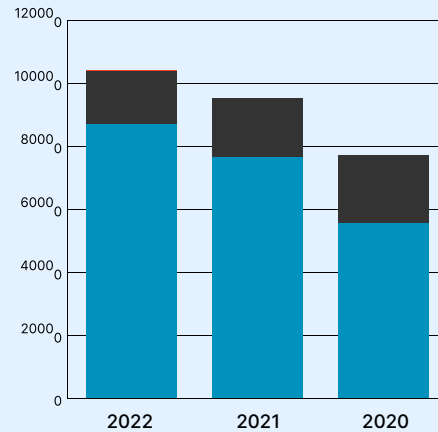
## Market-based GHG Emissions by Scope (MT CO<sub>2</sub>e)<sup>1</sup>



	2022	2021	2020
Scope 1	52.5	0.5	2.7
Scope 2	149	-	-
Scope 3	86,658	78,876 <sup>4</sup>	55,570
<b>Total</b>	<b>88,860</b>	<b>78,877</b>	<b>55,573</b>

<sup>1</sup> According to GHG Protocol Scope 2 Guidance, market-based method quantifies Scope 2 GHG emissions based on GHG emissions emitted by the generators from which the reporter contractually purchases electricity bundled with instruments, or unbundled instruments on their own.

## Location-based GHG Emissions by Scope (MT CO<sub>2</sub>e)<sup>2</sup>



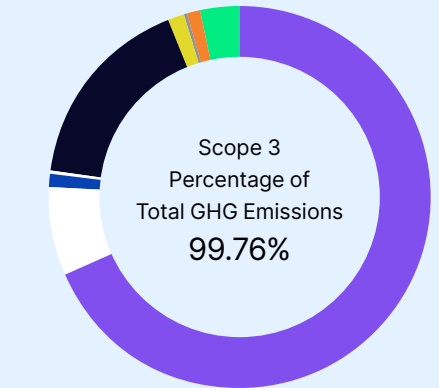
	2022	2021	2020
Scope 1	52.5	0.5	2.7
Scope 2	17,094	18,813 <sup>3</sup>	21,665
Scope 3	86,658	78,876 <sup>4</sup>	55,570
<b>Total</b>	<b>103,805</b>	<b>97,690</b>	<b>77,238</b>

<sup>2</sup> According to GHG Protocol Scope 2 Guidance, location-based method quantifies Scope 2 GHG emissions based on average energy generation emission factors for defined locations, including local, subnational or national boundaries.

<sup>3</sup> Our 2021 Scope 2 location-based emissions were recalculated from our prior reported 2021 Scope 2 emissions. For our 2022 and recalculated 2021 Scope 2 location-based emissions, we implemented a new, updated emissions methodology using location-specific emission factors for each of our U.S. locations, rather than a U.S. average emission factor.

<sup>4</sup> 2021 GHG emissions were recalculated to add Category 3 and Category 8 in order to align to our SBTi-approved base year.

## Breakdown of Scope 3 GHG Emissions (MT CO<sub>2</sub>e)



## Percentage of total market-based GHG emissions

1. Purchased Goods & Services	68.17%
2. Capital Goods	7.25%
3. Fuel- & Energy-Related Activities	2.32%
5. Waste Generated in Operations	0.21%
6. Business Travel	16.49%
7. Employee Commuting	1.52%
8. Upstream Leased Assets	0.26%
13. Downstream Leased Assets	0.17%
15. Investments	3.37%
<b>Scope 3 Sub-Total</b>	<b>99.76%</b>

# Reducing and Neutralizing Our GHG Emissions

## Procuring Energy from Renewable Sources

We conduct an annual review of our energy consumption and emissions to evaluate how our energy reduction and sustainability initiatives are tracking against our internal goals and our new science-based targets.

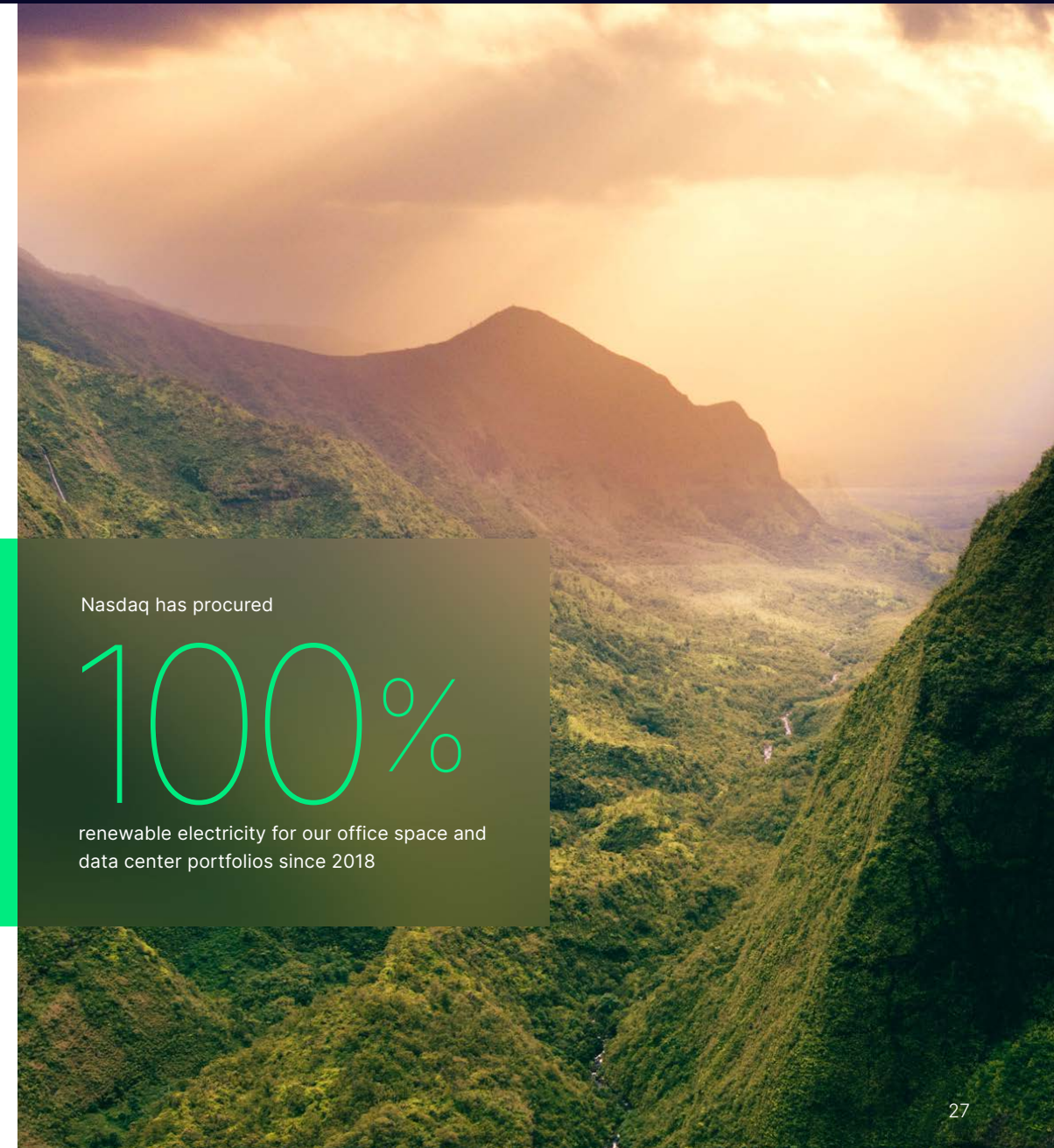
Nasdaq has procured 100% renewable electricity for our office space and data center portfolios since 2018. Sourcing renewable electricity is a major focus for Nasdaq and is an integral feature in our site selection process for new office and data center locations, lease negotiations and electricity contracts. For 2022, our pre-negotiated renewable energy contracts accounted for over 84% of our annual global consumption, of which virtual power purchasing agreements account for 48% of our total consumption.

For the remaining 16% of electricity that is not acquired through pre-negotiated renewable energy contracts, Nasdaq purchases RECs that meet our quality requirements, which include:

- having corresponding requisite attestations and verifications;
- providing new renewable energy to the grid that has been consumed by each Nasdaq office; and
- being less than five years old with high priority given to those projects in operation for less than one year, to stimulate demand for new renewable energy projects in the local power grid.

This resulted in Nasdaq reducing our market-based Scope 2 GHG emissions (excluding steam and district heating) to zero on an annual basis in 2022.

Our total energy consumption in 2022 decreased by nearly 14% from 2021, due to our optimized leasing strategy and improved data quality.

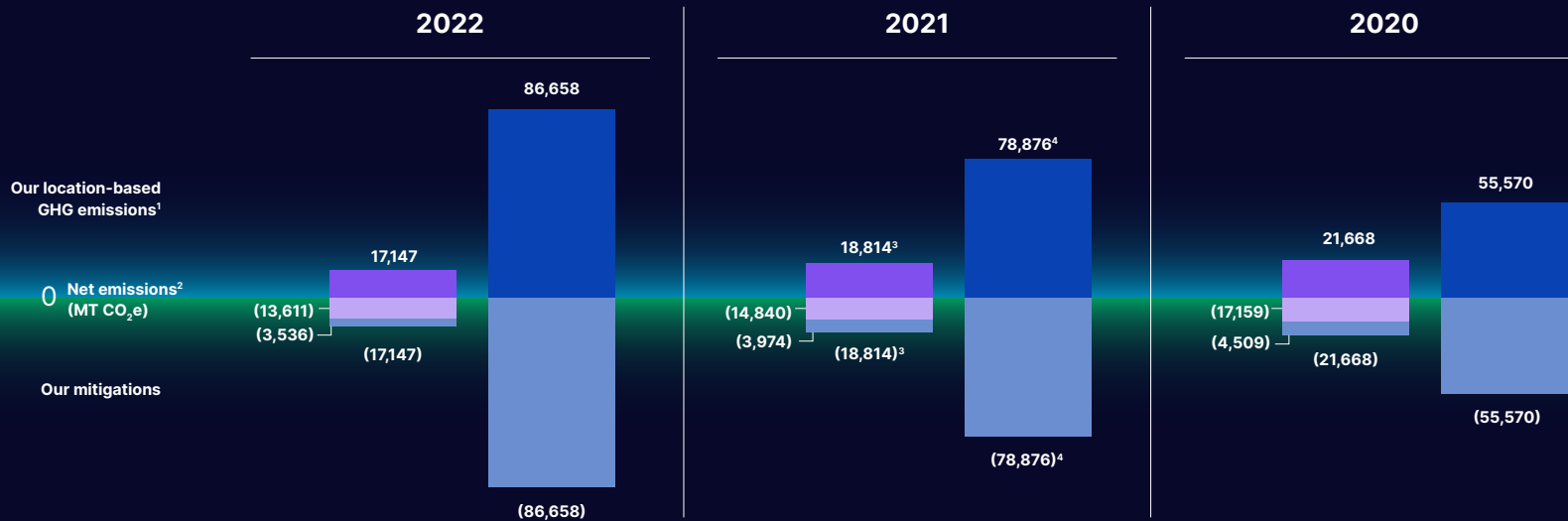
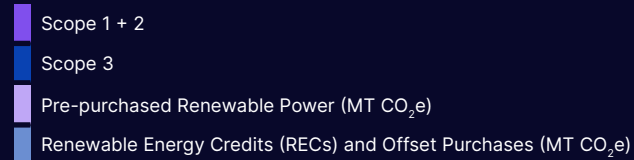


Nasdaq has procured

100%

renewable electricity for our office space and data center portfolios since 2018

The chart below reflects a summary of how we neutralize our Scope 1, Scope 2 and Scope 3 emissions.



Note: Scope 2 and Scope 3 Category 8 Upstream Leased Assets emission data for 2020 & 2021 is restated, as we moved our indirect natural gas and diesel related emissions to Scope 3 to align to best practices.

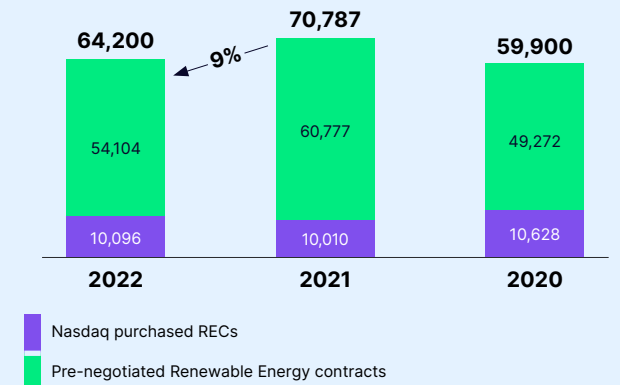
- 1 Gross emissions before landlord & data center operator renewable energy supply factors are applied.
- 2 Net emissions after landlord & data center operator renewable energy supply factors and Nasdaq REC & CO purchases are applied.
- 3 Our 2021 Scope 2 location-based emissions were recalculated from our prior reported 2021 Scope 2 emissions. For our 2022 and recalculated 2021 Scope 2 location-based emissions, we implemented a new, updated emissions methodology using location-specific emission factors for each of our U.S. locations, rather than a U.S. average emission factor.
- 4 2021 GHG emissions were recalculated to add Category 3 and Category 8 in order to align to our SBTi-approved base year.

GRI 302 | GRI 302-1 | GRI 302-2 | GRI 302-3 | GRI 305 | GRI 305-5

Our energy consumption data was collected by the following methods (listed in priority):

1. Full year actual data for the Nasdaq space consumption.
2. Full year actual data for the entire building in which the Nasdaq space is located. Nasdaq's proportionate share of the consumption was then calculated using occupied square footage within the building.
3. Where data was unavailable, estimates were calculated using assumptions on the office location, amenities within the space, square footage and headcount.

Scope 2 Electricity Consumption (in MWh)



In the charts above:

- Percentage of total operational spending on energy (most recent reporting year): more than 5% less than 10%.
- No energy was sold in the reporting periods.
- Source of Conversion factors used: <https://www.eia.gov/energyexplained/units-and-calculators/energy-conversion-calculators.php>
- Whenever possible, Nasdaq's actual energy consumption was included in the calculation; otherwise, a proportional share was determined using occupied square footage. If energy data was completely unavailable, estimates were based on office location, amenities, square footage and headcount.

### Reducing Energy Intensity

The following table shows our energy intensity as the absolute energy consumption per full-time employee.

Energy Intensity Ratio	2022	2021	2020
Absolute energy consumption (MWh) (Scope 1 & 2) <sup>1</sup>	64,882	75,143	62,364
Number of full-time employees <sup>2</sup>	6,377	5,814	4,830
Energy intensity (per full-time employee) <sup>3</sup>	10.2	12.9	12.9

1 Includes fuel, electricity, heating and cooling.  
 2 Employee headcount as of December 31, 2022, 2021 and 2020.  
 3 Energy intensity is calculated as a ratio between Nasdaq's absolute energy consumption and the number of full-time employees.














Despite an increase in employees in 2022, our energy intensity declined due to a reduction in energy consumption.




### Our Carbon Offset Strategy

Our focus is to reduce our GHG emissions to reach our science-based targets, but we also strive to ensure that we are neutralizing our residual emissions as we transition to becoming net-zero. As part of our carbon neutrality program, we plan to:

- establish a long-term strategy for our estimated net-zero residual emissions and build a portfolio of high-quality engineered carbon dioxide removal projects with proven permanence that have been certified by the ICROA-endorsed Puro standard; and
- offset Nasdaq's remaining emissions as we move towards achieving our science-based net-zero target, utilizing a combination of high-quality nature-based carbon offset projects that preserve or enhance carbon storage and strengthen the biodiversity of our global forest networks verified by ICROA-endorsed standards.

In 2022, we purchased carbon offsets to neutralize our 2022 residual GHG emissions from projects as summarized below:

Project	Standard	Location	Project Type	Description
<b>Aperam BioEnergia Biochar</b>		Brazil		The project uses biomass residue to sequester carbon dioxide in biochar for use in soil amendment in forest crops and it runs a charcoal operation with emissions control in the northeast region of Minas Gerais, Brazil. The addition of biochar helps improve soil properties and water retention in the soil. The project also supports social development programs for local farmers.
<b>Katingan Peatland Restoration and Conservation Project</b>	 	Indonesia	  	The project aims to tackle climate change by restoring and protecting peatland ecosystems, enhancing biodiversity and offering local people sustainable sources of income. In addition to peatlands preservation, this project aims to reforest through three programs: community-led agroforestry, fire break implementation and intensive reforestation. The team will grow saplings in on-site nurseries and conduct regular maintenance to improve the rate of tree survival.
<b>Degraded Grassland Afforestation Project</b>	 	Colombia		The project aims to recover degraded grasslands in Vichada, Colombia, through afforestation activities. The project plans to promote connectivity between ecosystems by improving soil quality, enhancing biodiversity and reducing freshwater withdrawal. The project generates benefits for the local population by providing employment opportunities and education.
<b>Tambopata-Bahuaja Biodiversity Reserve</b>	 	Peru		The project aims to conserve high biomass density tropical forest against deforestation in Tambopata National Reserve (RNTAMB) and the sector of Bahuaja-Sonene National Park (PNBS) located in Madre de Dios region. The project is located in a key biodiversity area and endemic bird area, with high ecological and sociocultural significance.

-  Wetland Restoration and Conservation (WRC)
-  Reduced Emissions from Deforestation and Degradation (REDD)
-  Afforestation, Reforestation and Revegetation (ARR)
-  Biochar

# Aligning Corporate Strategies to Support Reaching Net Zero

Reducing Nasdaq's GHG emissions and meeting our ambitious short- and long-term science-based targets will require initiatives that reach across all of our businesses and operations. We are therefore reviewing Nasdaq's corporate strategies in an effort to align our existing processes and policies to support our environmental ambitions.

## Environmental Management System (EMS)

Nasdaq is committed to prioritizing environmental efforts and ensuring sustainability is considered in our major operations. To help drive this progress towards a more sustainable future, we have implemented an EMS to govern our Real Estate and Facilities (REF) and Data Center (DC) portfolios, which are major contributors to Nasdaq's carbon footprint.

Our EMS follows the structure informed by ISO14001, commonly recognized as the leading EMS international standard. The purpose of our EMS is to provide a framework to assist Nasdaq in achieving our environmental goals through consistent

review, evaluation and improvement of our environmental performance.

Key processes covered by the EMS include:

- Environmental requirements during site selection for new offices/data centers, including access to renewable energy, access to mass transit, locations with green/energy/ISO certifications
- Green leasing clauses
- Global standards for design and performance
- Operational and maintenance procedures and policies
- Sustainable procurement and energy efficiency
- GHG standards for suppliers

## Green Certifications

As part of our sustainability strategy, Nasdaq is committed to the wellbeing of our employees and the communities in which we operate. In 2022 we achieved:

- LEED Gold Interiors D + C (Design and Construction) Certification in one of our office spaces.
- LEED Gold O + M (Operations and Maintenance) Certification in seven of our office spaces.

As of 2022, 55% of Nasdaq global office space by square foot (12 office locations) is now in a Green Certified office. This is a 37 percentage point increase over 2021. We aim to have all key offices green certified by 2030.

## Sustainable Leasing Strategy

Optimizing efficiency and overall sustainability of our real estate portfolio continues to be a key focus. In 2022, we continued our sustainable leasing strategy which assesses factors such as easy access to mass transit, guaranteed certifiable renewable energy supply and thoughtful rightsizing of the portfolio.

**Business Travel**

Business travel is a significant contributor to Nasdaq’s GHG emissions. In 2022, business operations returned to pre-pandemic levels and we experienced an increase in business travel, approaching levels similar to those of 2019. In 2023, we continue to engage with our travel partners and explore strategies and opportunities to reduce our business travel GHG emissions.

The Scope 3, Category 6 business travel includes emissions from planes, trains, hired vehicles, taxis and car services and hotel stays.

**Employee Commuting**

Nasdaq’s strategy to encourage employees to return to the office has also resulted in an increase in employee commuting GHG emissions. Nasdaq is continuing to mitigate these emissions through our hybrid work program and sustainable leasing strategy to lease space near public transport and to provide employees benefits designed to encourage the use of public transport. We also continue to improve and mature the carbon footprint data sources and processes of Nasdaq’s carbon footprint analysis. Through innovative technologies, we seek a better understanding of our emissions and corresponding data sources in an effort to reduce the reliance on assumptions. We

continue to evolve by staying up to date with the latest resources and best practices, and having our entire Scope 1, Scope 2 and Scope 3 GHG emissions third party verified via limited assurance.

**Waste**

Waste reduction, recycling and compost diversion are key priorities for Nasdaq in the operation and management of its facilities. Throughout our office space lifecycle, we have built processes that focus on reducing waste, reusing products and the sustainable procurement of products required to maintain our facilities and employees.

These processes include green leasing terms for landlord waste management, office construction/renovations, product procurement, maintenance and cleaning and office decommissioning.

We have also implemented several programs to reduce our waste and improve the data accuracy for our landfill and diversion rates. These include:

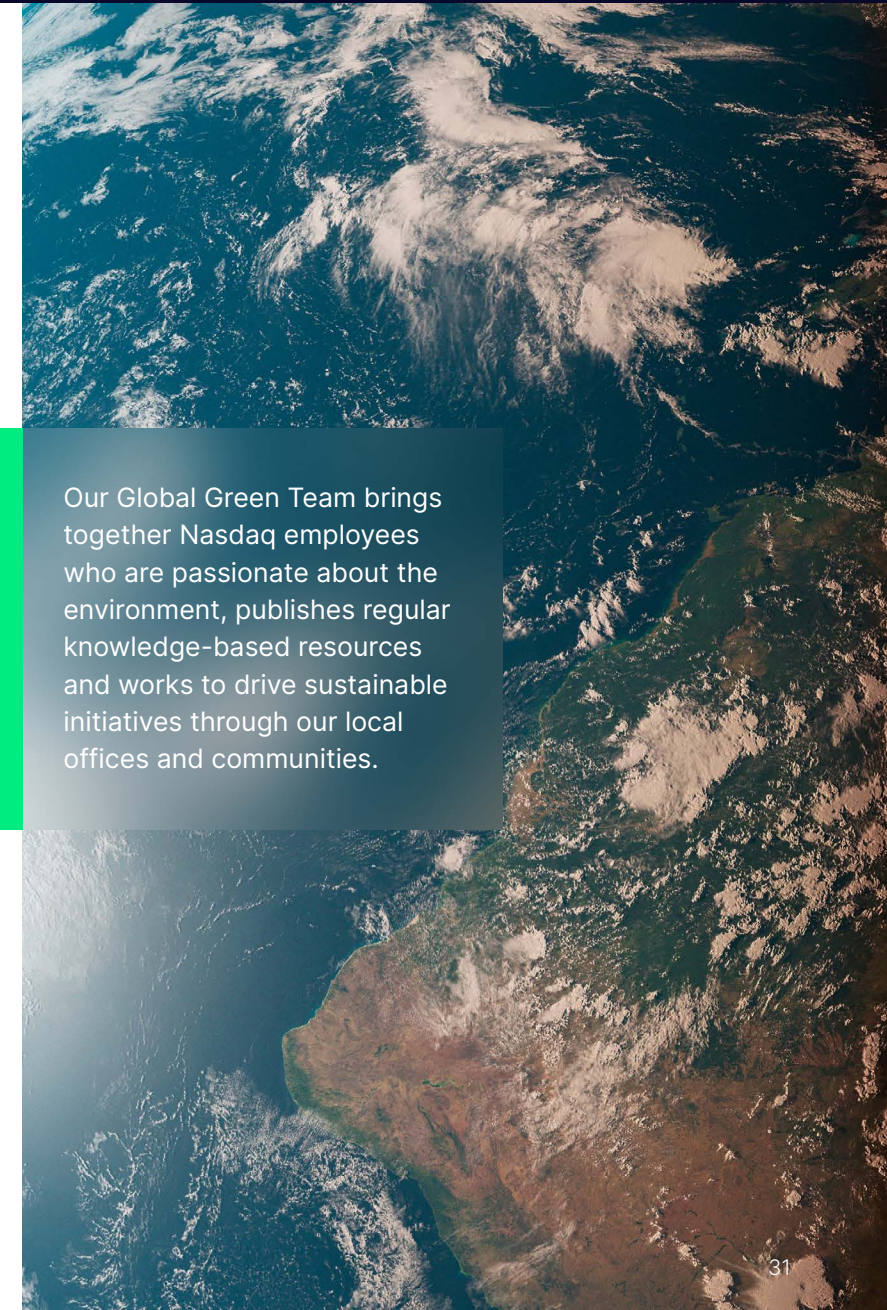
- continuing to achieve green certification in our office spaces, which includes implementing policies around sustainable product procurement, reusing products and recycling waste;

- implementing our EMS to ensure that we focus on sustainable operational purchasing strategies, construction and office decommissioning; and
- conducting waste audits in our key offices to gain greater detail into how much waste we generate and divert from landfills.

Refer to page 83 for data regarding our waste consumption.

**Nasdaq’s Green Team**

Our Global Green Team brings together Nasdaq employees who are passionate about the environment, publishes regular knowledge-based resources and works to drive sustainable initiatives through our local offices and communities. The Green Team aims to instill a culture of environmental advocacy and action through educational sessions that focus on sustainable practices, informative webinars and community outreach. Nasdaq supports the Green Team’s commitment to creating positive change throughout the Company and our neighboring communities as we drive to achieve our longer-term net-zero goals.



Our Global Green Team brings together Nasdaq employees who are passionate about the environment, publishes regular knowledge-based resources and works to drive sustainable initiatives through our local offices and communities.

# Evaluating and Engaging Our Supply Chain

Nasdaq's supply chain is the main contributor to our carbon footprint, accounting for over 60% of our total 2022 GHG emissions. Evaluating and engaging with our key suppliers and entire value chain is key to reaching our net-zero targets. In 2022, GHG emissions from our suppliers decreased by nine percent from 2021, due largely to improved data quality. As our processes mature and acquired companies transition on to Nasdaq systems, we expect to rely less on assumptions.

Nasdaq also encourages its suppliers to adopt sustainability and environmental practices in line with our published [Environmental Practices Statement](#) and the [Nasdaq Supplier Code of Ethics](#) (Supplier Code). In 2022, Nasdaq asked new suppliers and existing top suppliers to attest to our Supplier Code, confirming they have policies and practices consistent with the Supplier Code or, to the extent they do not, will adhere to the applicable standards in the Supplier Code.

To the extent practical and feasible, we expect suppliers to provide us with information to support our reporting and

transparency commitments related to sustainability and environmental impacts. In 2022, Nasdaq became a CDP Supply Chain corporate member and began requesting that our top suppliers disclose their environmental data through CDP's Climate Change survey. For our efforts, we were recognized by CDP as a Supplier Engagement Leader in 2022, placing us among the top eight percent of companies for taking action to measure and reduce climate risk within our supply chain. We set a target to request even more suppliers to respond to the survey, including our top 150 suppliers in 2023 and top 200 suppliers in 2024.

As part of our near-term science-based emissions reduction targets approved by the SBTi in 2022, we pledged that 70% of our suppliers by spend, covering purchased goods and services and capital goods, will set science-based targets by 2027. As of year-end 2022, 37.9% of our suppliers had set or committed to set science-based targets. As we request more suppliers to respond the CDP Climate Change survey, we will encourage them to set science-based targets of their own.



Among the top

8%

of companies for taking action to measure and reduce climate risk within our supply chain

We commit that 70% of our suppliers by spend, covering purchased goods and services and capital goods, will set science-based targets by 2027.

37.9%

of our suppliers had set or committed to set science-based targets as of year-end 2022



# Natural Resource Management

We undertook a company-wide engagement to assess the nature-related risks and opportunities for Nasdaq, evaluating where business responsibility sits within the organization and analyzing our impacts and dependencies on nature. Though our office spaces are leased, we are looking to reduce our natural resource consumption and the wider externalities generated through our operations. Currently, this is undertaken through:

- the tracking of commercial water and waste usage and outputs, which have resulted in conservation initiatives;
- sustainability certifications for Nasdaq's buildings, which incorporate restrictions around greenfield sites, waste and recycling; and
- renewable energy procurement and wider emissions reduction activities.

## Water

Nasdaq consumes water in our office space that is leased from commercial office buildings and data centers. We therefore do not have a significant impact on water systems.

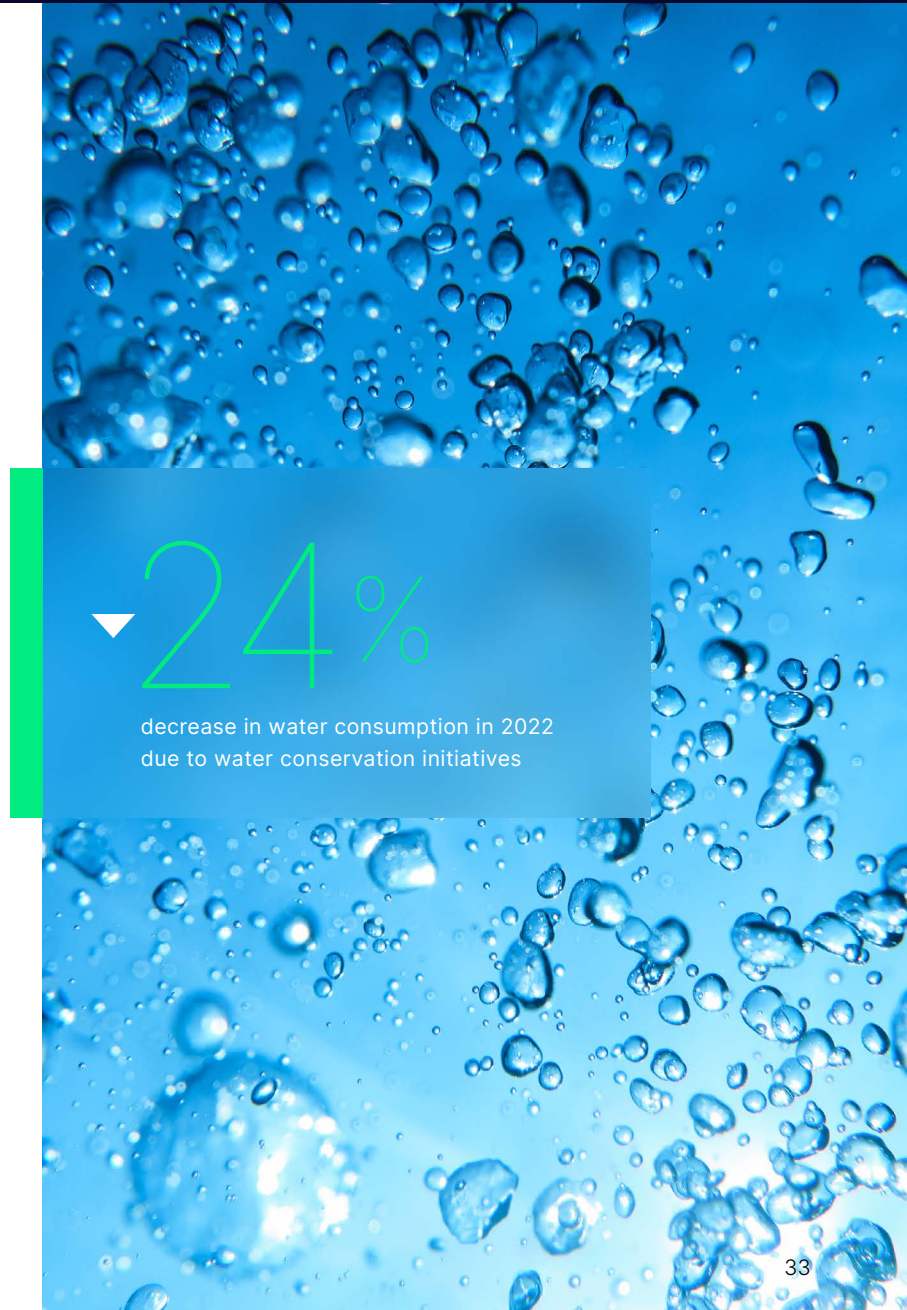
Water conservation initiatives are pursued to align with Nasdaq's ESG goals, which aim to reduce consumption across all resource categories. This is achieved by obtaining green certifications that install water efficient infrastructure and reduce wastewater. We also reduce water consumption via sustainable leasing strategies that reduce the reliance on older, less water efficient equipment and by considering factors in our supply chain and sourcing decisions.

Due to these initiatives, in 2022 Nasdaq decreased our water consumption by 24% compared to 2021.

Refer to page 83 for additional details regarding our water consumption.

## Taskforce on Nature-related Financial Disclosure (TNFD)

In 2021, 40 organizations came together to establish the TNFD. The TNFD is built on the pillars and principles of the TCFD, following the structure of governance, strategy, risk management and metrics and targets. In 2022, we joined the TNFD Forum to support the development of the new disclosure framework focused on nature and biodiversity. Nasdaq supports TNFD's market-led approach to developing a framework that is "scientifically rigorous and easy to adopt for both businesses and financial institutions."



# Social: Solidifying Progress for All



Our people are foundational to Nasdaq’s success. We focus our efforts to build a leading global employer brand that attracts, hires and retains the very best talent, allowing us to serve the market’s current needs while evolving to meet new ones.

In 2022, we launched our Culture Book, which tells the unique story of what it’s like to work and grow at Nasdaq. It shares Nasdaq’s mission, vision, values and unwavering purpose — to advance economic progress for all. Whether we’re working in the office or from home, these guiding principles align and inspire us every day. The Culture Book offers current and future employees a roadmap to learn how they can make a difference, achieve their goals and advance their careers with us.

At Nasdaq, we remain dedicated to fostering an inclusive, equitable environment where our colleagues can bring their true selves, do meaningful work and thrive in a supportive, vibrant community.

**Bryan Smith**  
Chief People Officer, Nasdaq

## 2022 Highlights



Established an executive Diversity Steering Committee



Tied a component of our senior leadership team’s executive compensation to our DE&I goals



Introduced the Accelerate(Her) program, designed to develop female talent at Nasdaq



Launched our newly designed career website



Launched Conscious Inclusion and Inclusive Leadership training classes for all employees

100%

executive team participation in our “Inclusive Leadership” training

4.3%

6.8%

2021

2022

Increased the percent in addressable spend with U.S.-based diverse-owned suppliers from 4.3% in 2021 to 6.8% in 2022

113

new diverse suppliers added through our supplier diversity initiatives, which represents over \$1.4 million in supplier spend

# Diversity, Equity and Inclusion

Nasdaq's People Team is responsible for ensuring equitable employment and career development practices across the company, as well as fostering a culture of inclusion and belonging for all.

During 2022, we focused on educating our employees on diversity topics, including optional diversity training for all employees and required inclusive leadership training for all managers. In 2021, global managers completed our "Conscious Inclusion" training, a training focused on learned best practices and tactics to create a more inclusive environment. In 2022, we expanded this training to the non-manager population, where general employees completed over 2,700 hours of Conscious Inclusion training. Our managers completed over 820 hours of training in "Inclusive Leadership," a course designed to drive awareness around opportunities for inclusion, allyship and advocacy. One hundred percent of our executive team participated in the "Inclusive Leadership" training.

In 2022, we saw close to a one percentage point increase in both our female population (globally) and our Black, Hispanic/Latinx and multi-cultural

employees (in the U.S.). In 2023, we will again strive to gain at least one percentage point in representation of female and underrepresented employees. Additionally, Nasdaq has established an executive Diversity Steering Committee to focus on diversity at the executive level.

In 2022, we committed to holding our senior leadership responsible for their business's participation in diversity development efforts. We will continue this endeavor in 2023, tying a component of executive compensation to achieving our Company's diversity, equity and inclusion goals. These goals include: driving a culture of inclusion by ensuring women and employees of diverse backgrounds are participating in our formal mentoring program; fostering diversity for all externally posted Vice President (VP) and higher roles by interviewing diverse slates of candidates; and continuing to focus on increasing diversity in executive succession plans.

As part of our Company's commitment to achieve greater diversity in our workforce over time, we reached our 2022 goal to present at least one qualified female candidate as part of the candidate slate

for all VP and above roles. In addition, we surpassed our 2022 goal of a 10 percentage point increase in diverse executive succession candidates, increasing diversity in succession candidates by 11 percentage points. We plan to continue these initiatives in 2023.

We have also adopted new initiatives to increase a culture of inclusion in the workplace, including broadening our mentoring programs and introducing a renewed focus on sponsorship. In 2022, we examined key people processes (e.g., hiring, development, performance management, advancement) to ensure they are equitable and allow all Nasdaq employees similar access to develop professionally and advance in their careers. In response to this examination, we launched our new Accelerate(Her) program, specifically designed to develop high-potential female talent at Nasdaq by matching small cohorts of participants to Nasdaq's most senior executive women for career coaching and sponsorship.



# Workforce

## Employee Networks at Nasdaq

Nasdaq’s Employee Networks are a key component of our diversity strategy. They provide a forum for our employees to come together on shared topics and interests and are open to everyone who wishes to participate. Our Employee Networks celebrate our diversity and foster a sense of inclusion and belonging that strengthens our culture. The networks aim to empower employees to succeed with initiatives that promote professional advancement, provide networking opportunities and build mentorship, advocacy and support to our communities. Participants in Nasdaq’s 11 networks represent approximately 37% of our employee population. Our employee networks are supported by the executive leadership team and each employee network has an executive sponsor.

### ¡Adelante Nasdaq!

¡Adelante Nasdaq! is our global employee network dedicated to employees who have an interest in Hispanic/Latino culture and heritage.

### Asian Professionals at Nasdaq (APAN)

APAN is a platform to support and empower our community of members through professional development and social engagements.

### Global Green Team

Global Green Team brings together Nasdaq employees who are passionate about sustainability and making a positive impact on the environment and planet.

### Global Link of Black Employees (GLOBE)

GLOBE provides a platform for connection and collaboration for employees who have an affinity or interest in Black, African, African American and West Indian culture at Nasdaq.

### Nasdaq Accessibility Network

Nasdaq Accessibility Network is for Nasdaq employees who have disabilities themselves, who have family members with disabilities or who have an interest in accessibility topics.

### Nasdaq Administrative Professionals Network

This network enables administrative professionals across all geographies and demographics to collaborate with each other on shared topics, best practices and interests.

### The Out Proud Employees of Nasdaq (The OPEN)

The OPEN represents the LGBTQ+ employees, their families and allies.

### Parents and Caregivers

This network, which is for Nasdaq employees who identify themselves as parents or caregivers, aims to foster a workplace where employees feel confident that they can have a rewarding career while being fully committed to their family.

### Software Engineer Employee Network (SEEN)

This network is for Nasdaq colleagues who are enthusiastic about Software Engineering. The group seeks to bring like-minded individuals together by fostering a sense of community for software professionals in a fast-paced technology environment.

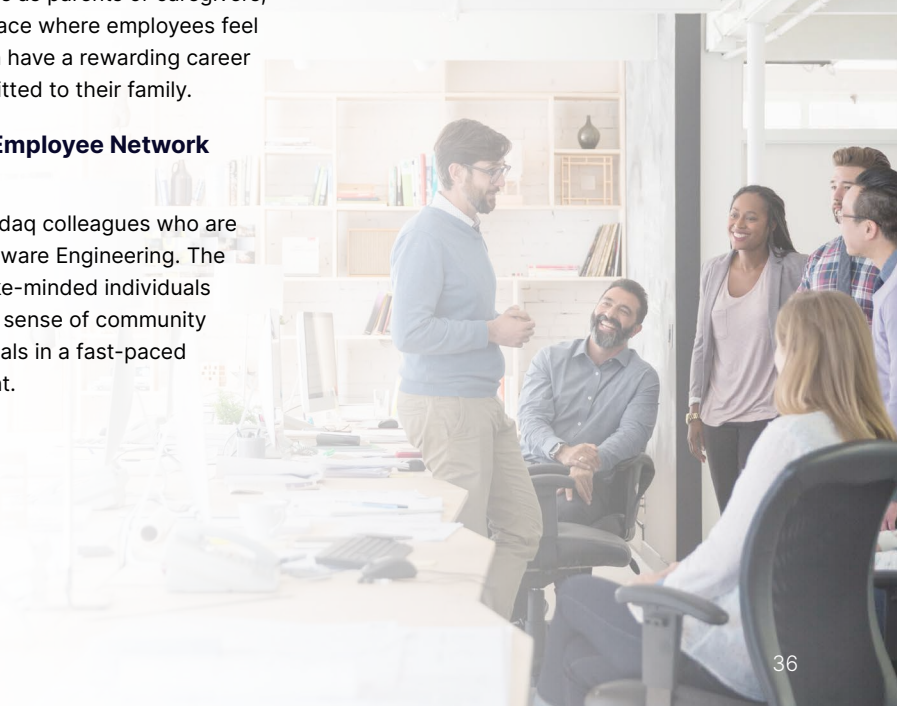
### Veterans@Nasdaq

This network brings together those employees who have served or are currently serving in the military, who are part of military families and their supporters.

### Women in Nasdaq (WIN)

WIN brings women and their allies at Nasdaq together to provide community, growth and learning opportunities, networking and visibility that supports the advancement of women at Nasdaq personally and professionally.

For more information, visit our [Diversity, Equity, and Culture webpage](#).



# Global Workforce

We continue to provide transparent disclosure of our global workforce as well as further disclosure of ethnicity where available.

Unless otherwise indicated, social data tables in this report exclude employees of non-wholly owned consolidated subsidiaries.

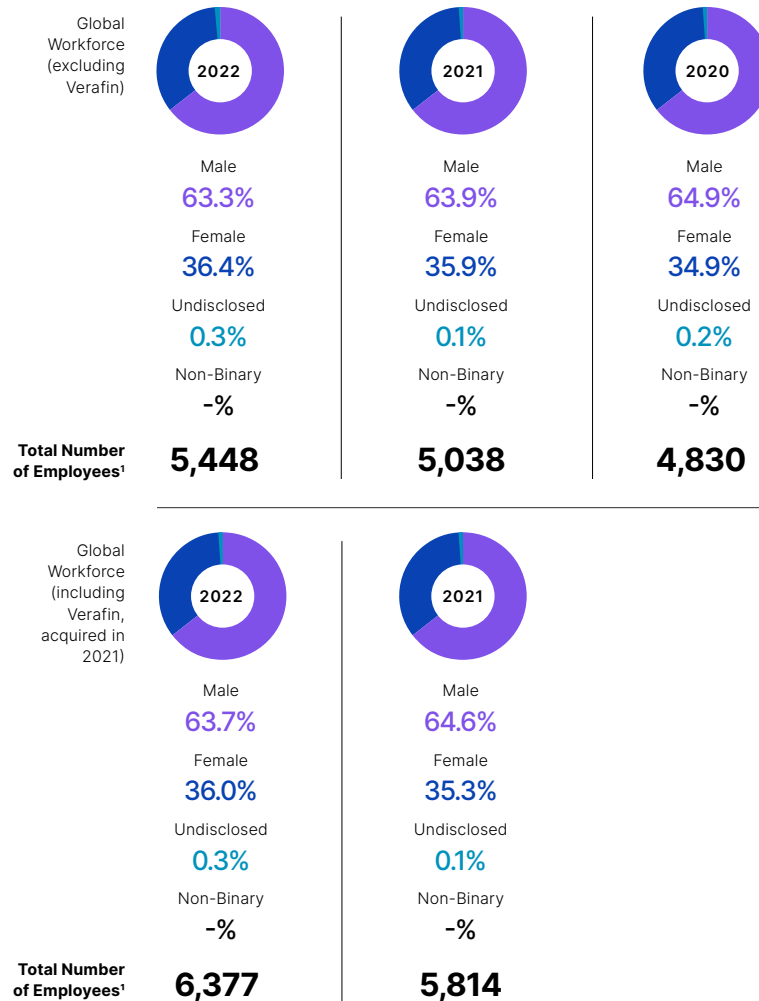
## Gender Pay Gap Analysis

Nasdaq is committed to equitable pay for all people in our workforce. That commitment is embedded within our multifaceted compensation program. As part of that program:

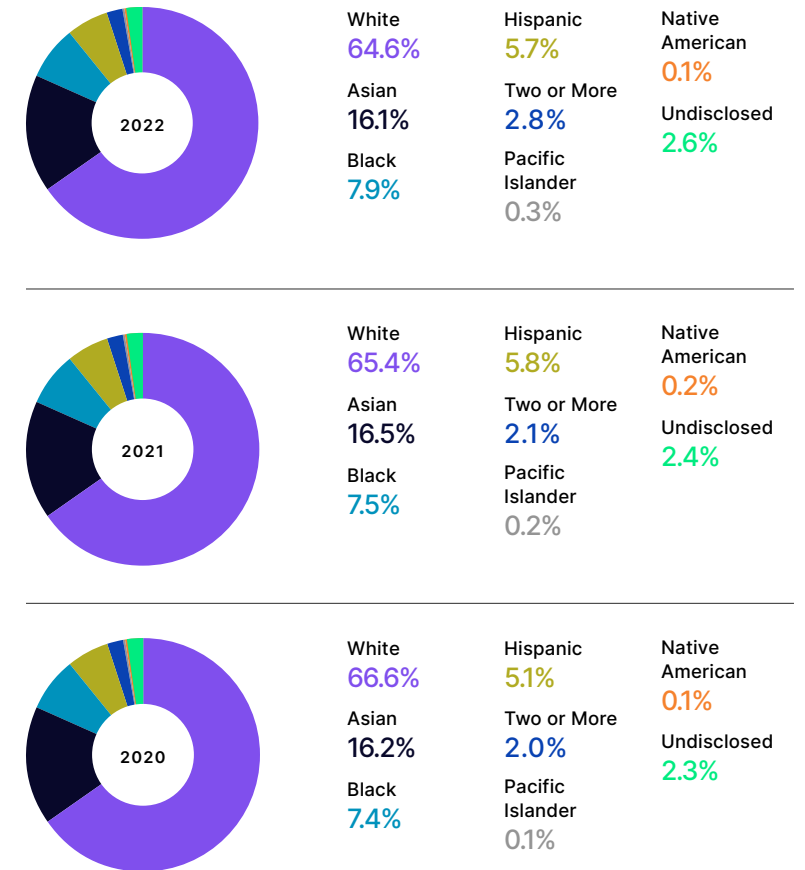
- We have systems in place to establish and review pay upon hire, promotion and role changes within the Company.
- We have an annual process in place to run a regression analysis on gender (globally) and race/ethnicity (in the United States), assessing employee base pay and total compensation (base + bonus + equity).
- When appropriate, we take action based on these systems and annual process.

GRI 2-7 | GRI 202-1 | GRI 405-1 | GRI 405-2  
 SASB TC-SI330a.3  
 WEF Core 11 | WEF Core 12 | WEF Core 13

### Global Workforce by Gender



### U.S. Workforce by Racial Ethnicity



Note: The U.S. reporting on Race and Ethnicity follows the U.S. Department of Labor's EEO-1 reporting standards. The races and ethnicities reported are American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, Two or More Races and White. Please note that totals may not add up to 100% due to rounding to the closest tenth decimal point.

<sup>1</sup> Total includes employees of non-wholly owned consolidated subsidiaries excluded from percentage calculations.

# Human Capital Management

Our people are the primary driver of our success. Nasdaq is committed to attracting top talent and retaining, developing and motivating our employees. Throughout 2022, we added new professional development opportunities, as well as new platforms leveraging artificial intelligence (AI), to bring internal job opportunities and short-term developmental projects directly to employees.

During 2022, we launched the Career Hub (part of our enterprise Human Resources technology platform) to provide AI-enabled, customized career development recommendations and planning resources for every employee. The Career Hub provides recommendations for training programs, mentors, informal networking and short-term gigs via the Talent Marketplace where employees can find project opportunities outside of their day-to-day roles to develop their skills directly and encourage mobility through visibility of internal open job requisitions.

Performance objectives were created for each of our managers that measured them in terms of their managerial effectiveness, with

the outcomes included in each manager's year-end performance evaluation.

## Talent Development

Nasdaq supports the development of employees through each important transition in their careers – as new entrants to the organization, as developing professionals, as managers of teams and as senior leaders of our global organization.

In 2022, we continued to assess the current state of our talent, define the skills needed to achieve our strategic goals, set performance objectives to measure individual growth, provide opportunities for skills development and utilize the process to advance talent equitably.

To identify our talent needs, Nasdaq makes extensive use of people analytics data in the following areas: measuring employee performance, strategic workforce planning, identifying flight risks in critical roles and uncovering individual and organizational skills gaps.

Nasdaq's Performance Management program was established to enhance

the job performance and professional growth of each employee. Under this program, every employee is asked to create a professional development plan for themselves each year in concert with their manager and record this plan in our performance management software.

In addition to providing mechanisms for ongoing feedback throughout the year, managers informally assess their employees in writing during the mid-year period and complete a formal year-end performance review by the end of each calendar year. In 2022, we introduced a five-point manager assessment regarding each employee's behavior relative to our Core Values as part of the year-end review to reinforce the importance of our culture.

Both parties meet to discuss the written assessment, which is recorded internally. These performance evaluations become part of the employee's formal personnel record and serve as a factor for consideration in internal job transfers and advancement decisions.



The goal and purpose of the performance review program is to:

- ensure each employee has a clear understanding of what is expected by their manager;
- align the activities of each employee to their respective Business Unit goals and to Nasdaq's annual goals;
- discuss the employee's job performance with respect to individual performance objectives and skills development; and
- inform each employee of the knowledge and skills they must acquire or improve to grow in the present job, move into a lateral role or advance at Nasdaq.

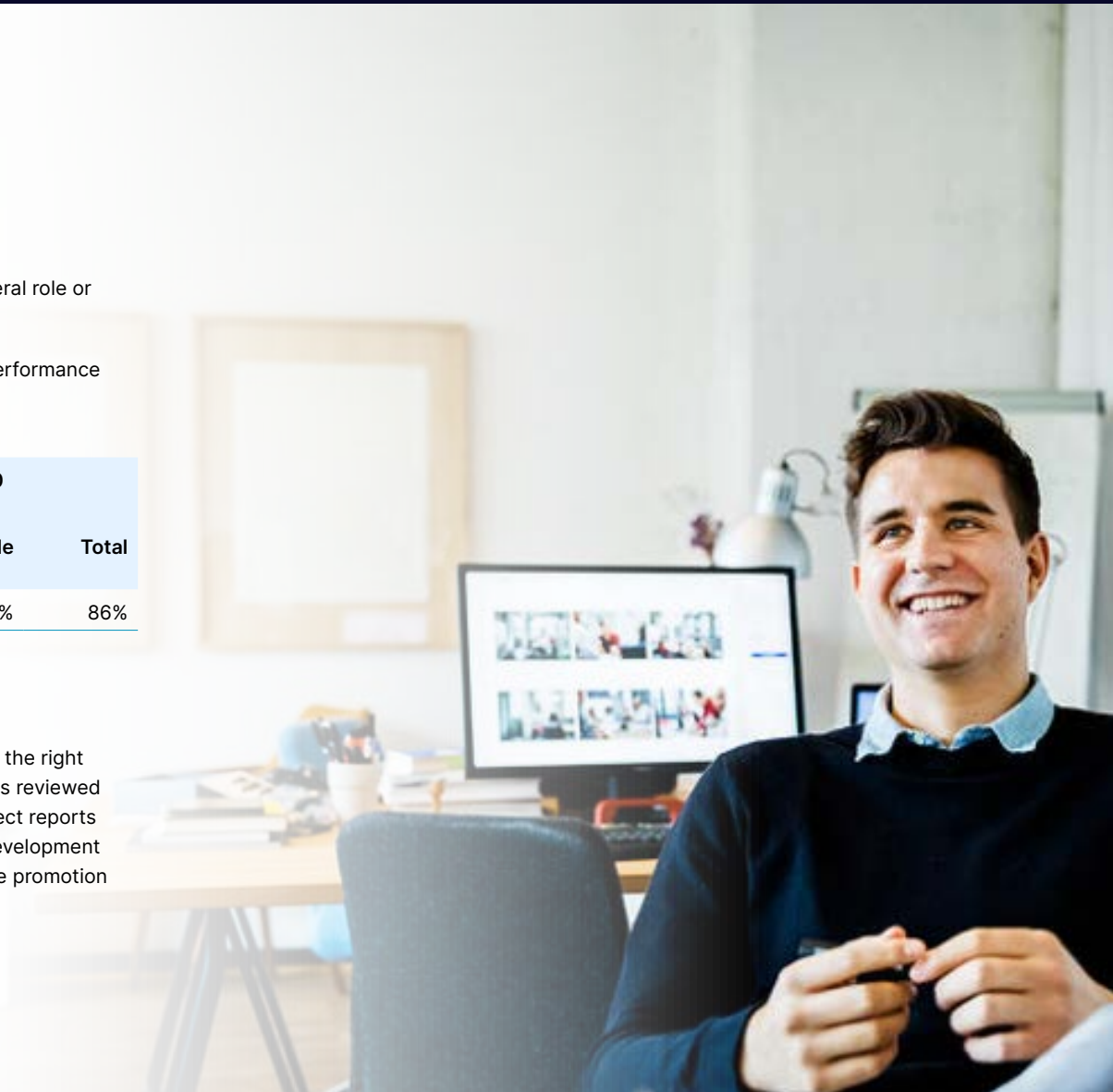
All employees received a performance rating. The table below indicates the percentage of employees who received both a performance rating and written comments on their performance for the 2022 reporting period.

Employee Performance Ratings with Written Comments, by Gender	2022 <sup>1</sup>			2021			2020		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Workforce	90%	90%	90%	93%	94%	93%	86%	86%	86%

<sup>1</sup> Calculation includes full-time, regular employees hired prior to October 1, 2022; excludes Verafin and Metrio employees.

Note: Review is optional for VP level employee and above.

Nasdaq conducts an annual executive succession planning and advancement exercise to help us align senior employees with the right opportunities across the Company, as well as mitigate risk for the Company in the event of unexpected turnover. The output is reviewed by the Board. In 2022, we piloted a wider talent review process for our employee population below the executive level. All direct reports of every VP and above were rated on performance and potential to identify our high potential, high performing talent, their development needs and our plan to close any gaps to achieve Nasdaq's strategic goals. We also introduced a global framework to make the promotion process more consistent and transparent at the AVP level and above.



# Career Development

For individual career development, we operate under the philosophy of the 70/20/10 Learning Principle, where roughly 70% of professional development happens through learning on the job; 20% through developmental relationships like coaching and mentoring; and 10% through formal training. Nasdaq offers a variety of professional development experiences via multiple channels and modes that support diverse learning styles.

We have invested heavily in professional development for our employees, creating a dedicated Career Development internal website that serves as a central point for dozens of career resources. These resources include offering access to more than 26,000 professional in-person and online employee development programs and job-specific training, providing tuition assistance to employees enrolled in degree-granting academic programs, holding internal career fairs and career networking programs and providing one-on-one mentoring.

As a technology organization, we recognize that building critical, cutting edge technical and financial skills is paramount and as such we have relationships with institutions of higher education, such as Massachusetts Institute of Technology (MIT), as well as corporate institutions such as the Amazon Web Services (AWS) Skills Guild, Microsoft's AI Business School and the Council on Foreign Relations.

Recognizing the critical role our people managers play in developing and retaining our talent, in 2022 Nasdaq offered over a dozen leadership and management development programs for every level of leader in the firm. In 2022, we also launched the Nasdaq Manager Forum. With our CEO as the facilitator, the Nasdaq Manager Forum is a series of webcasts that provides practical advice from leaders at every level across the organization on a wide range of people management topics.

In 2023, we launched our flagship High Potential program, LEAD, which will focus on preparing mid-level managers for future

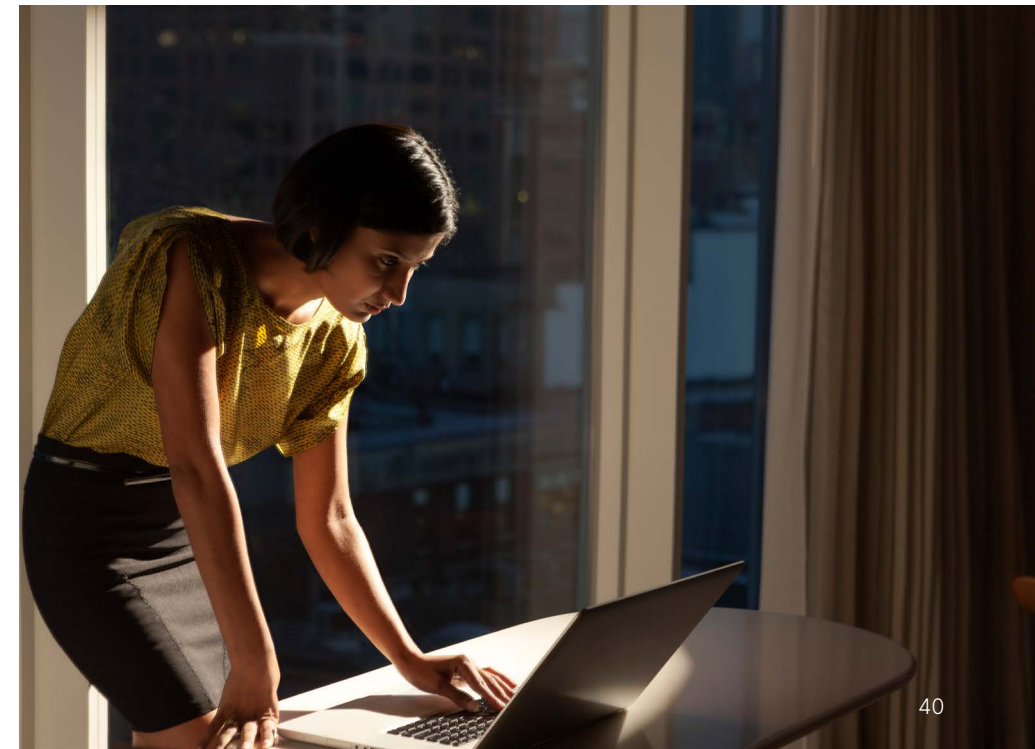
leadership roles through a curriculum based on building business acumen, leadership skills, peer networking and senior leader job shadowing opportunities.

In 2022, we provided Conscious Inclusion training for all employees and an Inclusive Leadership program for our managers. We customized our developmental program for underrepresented talent, including executive mentoring and accelerated leadership development programs. In 2022, we also graduated the second cohort of our Emerging Leaders Program, which currently serves members of our Black and African American community. Our Emerging Leaders Program will be expanded in 2023 to serve additional members of historically underrepresented communities in their professional development.

The table below highlights the average number of training hours for full-time employees for 2022.

Training <sup>1</sup>	2022	2021	2020
Average number of training hours	19.4	17.2	15.3
Average amount per employee spent on training	\$320	\$320	\$280
Total hours of employee training	103,083	86,423	72,950

<sup>1</sup> Includes full-time regular employees; excludes Verafin and Metrio employees.





# Attracting and Retaining Talent

To attract, recruit and retain talent, Nasdaq has continued to invest in building a best-in-class employer brand and candidate experience.

In September of 2022, we launched our newly designed career website to provide a much better candidate experience. As a result of this initiative, we experienced a one percent increase in conversions (number of website visitors applying to a role at Nasdaq) versus 2021, a 27% increase in site traffic and a 51% increase in time spent on our career website in the fourth quarter of 2022 as compared to the fourth quarter of 2021.

As part of our People Promise candidate experience campaign, we have introduced four pillars: Unparalleled Support, Work That Shapes Tomorrow, Diversity & Equity, and Making a Change for Good. Our People Promise pillars help Nasdaq differentiate itself from our talent competitors. It explains what we offer our employees and presents a compelling reason why people should join us.

As part of our awareness-building efforts and to diversify our candidate pool, Nasdaq attended AfroTech 2022, the largest conference for Black people in technology with over 15,000 attendees. In partnership with the National Society of Black Engineers (NSBE) and the Society of Hispanic Engineers (SHPE), we hosted 12 events and reached over 500 Black and Hispanic students at Georgia Institute of Technology, Howard University, University of Maryland, University of Toronto, Columbia University, the Colorado School of Mines and Massachusetts Institute of Technology – educating students about our internship program and career opportunities.

In 2022, we reached our goal to minimize diverse employee attrition by keeping our under-represented minority (URM) voluntary attrition rate in the U.S. under 10%, an effort we plan to continue through 2023. As part of our 2023 talent attraction and recruitment efforts, we are increasing our partnerships with diversity organizations, minority search firms and schools to ensure we continue to increase diverse slates of qualified candidates.

Through senior leadership engagement and amplifying our voice both internally and externally, in 2023 Nasdaq plans to expand our efforts to create content that tells our unique story, creates brand awareness and attracts talent.

Employee Turnover	2022	2022	2021	2021	2020	2020
	Number	Rate <sup>2</sup>	Number	Rate	Number	Rate <sup>3</sup>
Total Workforce – employee turnover <sup>1</sup>	575	11.0%	568	11.5%	464	7.0%
Total Workforce – new hires	1,061		1,082		856	

1 Voluntary attrition.

2 2022 percentage calculations exclude 907 Verafin employees due to internal timing of data integration.

3 Turnover was unusually low in 2020 due to the COVID-19 Pandemic.



# Employee Engagement and Satisfaction

Through Nasdaq’s diversity, equity and inclusion work, our resources are aligned to support our culture and engagement strategy. During 2022, Nasdaq continued to conduct employee sentiment surveys bi-annually. We realized significant improvements across many categories, including leadership, management and culture, compared to average scores over the past four years.

Nasdaq seeks to drive progress in employee engagement in a multitude of ways, but especially by focusing on the role of the manager. Each manager at Nasdaq with four or more direct reports receives a custom engagement report for their team containing the anonymous, aggregated responses of their team members, how their team compares to Nasdaq as a whole and industry averages and where their team may be higher or lower than the average. Nasdaq’s People Team partners with our managers and

Business Unit leaders to identify areas of opportunity and to develop action plans, for instance a focus on career development, communication and/ or recognition.

Nasdaq maintains several employee recognition programs, including a peer-to-peer recognition reward, where peers or managers can award recognition points that can be exchanged for goods or services. These awards are published to the entire company by means of a social feed so that the recognition can be amplified.

Nasdaq continues to build knowledge of our culture focused on economic growth and prosperity for all. In 2022, we crystallized our culture by publishing our first [Culture Book](#), an inside look at what it’s like to work at Nasdaq so employees can thrive as they work towards our Company’s goals.

We renewed our Humans@Nasdaq video series in 2023 to highlight internal talent

at Nasdaq. This storytelling series features individuals from across Nasdaq, showcasing and cultivating our corporate culture. The series also serves as a tool to reach potential talent outside our Company.

In 2022, over 90% of our employees participated in our engagement survey. Our engagement scores demonstrate Nasdaq’s high level of employee engagement and we are continuously reviewing our initiatives to identify opportunities to improve. In our employee engagement survey, questions have a five-point scale in which Nasdaq employees can choose which option best aligns with their feedback. We also offer a comments section and encourage free-form responses to any question where the employee wishes to provide more context. These comments are all reviewed, aggregated and shared (anonymously) where applicable.

Out of the 92% of our employees who participated in our engagement survey:\*

92% are proud to work for Nasdaq

90% would recommend Nasdaq as a great place to work

81% feel they belong at Nasdaq

87% believe Nasdaq is advancing Diversity, Inclusion and Belonging

85% believe people from all backgrounds have equal opportunities to succeed at Nasdaq

\*October 2022 Employee Survey

## Promoting Health and Wellbeing

At Nasdaq, we recognize and value the importance of health and wellbeing. We understand the impact health and wellbeing has on productivity and employee engagement. We also recognize the important role that our leaders play in creating a culture of wellbeing and belonging. As part of our employee engagement survey, we measure “my manager genuinely cares about my wellbeing” and we have seen favorable scores of over 90% over the past 12 months.

We also recognize the importance of investing in our people. Our employees, their families and their communities are important to us. We offer a holistic suite of programs, benefits and resources, known as You&Q, to meet our employees where they are – in their lives and career journeys. Whether our employees are focused on prioritizing their health, building their wealth, caring for their family, growing their career or connecting with their community, our You&Q program has something to help them prioritize and focus on their wellbeing.

- **Prioritize Your Health:** Everyone has different healthcare needs which is why we offer a diverse set of benefits and wellbeing programs to optimize health including medical, dental, vision coverage, health care flexible spending accounts, Employee Assistance Program (EAP), the Calm app, membership to Peloton and access to Sleepio, a digital sleep improvement program.
- **Build Your Wealth:** In addition to base salary and incentive plans, we are committed to rewarding our employees’ contributions and helping them have a prosperous future through the following programs: employee stock purchase plan, short-term and long-term disability, 401(k) match, student loan program and various other employee perks.
- **Caring for Your Family:** We recognize and value that employees have a life outside of Nasdaq and offer the following programs to support our employees’ family life: fertility coverage, paid parental leave, adoption/surrogacy assistance and optional pet insurance.
- **Grow Your Career:** Our robust learning opportunities and tuition reimbursement enable our employees to advance their capabilities and grow in their career.

- **Connect with Your Community:** We encourage our employees to engage, support and empower their local community through our robust network of employee resource groups, charitable matching program and paid time off to volunteer.

You&Q is designed to be both inclusive and representative of the diverse needs of our employees, with the ability to evolve to meet the changing needs of Nasdaq and our workforce. As an example, in response to the pandemic, enhancements such as caregiver support, back-up childcare, hybrid work schedules and flex days were introduced. Flex days (currently six per year) are dedicated days for employees to care specifically for their own mental health and wellbeing. These programs are now here to stay as a result of the positive feedback from our employees.

In 2023 and beyond, we are continuing to focus on enhancing a culture of belonging and wellbeing at Nasdaq.

For more information about our employee benefits, visit our [Career website](#).



# Nasdaq Employee Testimonials



## Making an impact and doing purposeful work

*Director, Software Engineer*

It's really cool to work on projects that have such an immense global impact. Knowing that your efforts are changing things around the world is motivating. It's also great to work on diverse teams with folks from around the world and travel to those places to see the products in action. Seeing users actively engage in what you produce creates a deeper level of commitment.



## A world of opportunities

*Manager, Surveillance*

When I talk about Nasdaq with friends and family I usually discuss the great opportunities that we have within the organization. We have big market tech operations, a huge legal presence, we have people in sales and other critical systems that we're responsible for. There is definitely something here for everyone.



## An innovative and dynamic work environment

*Senior Director, Technical Writer*

When I think about what makes Nasdaq unique compared to other employers, it's that we get to work at the intersection between software development and finance. We get to learn both parts and we need to understand the business of our customers deeply to make sure we develop the functions they need to be successful. The other part is that the financial industry is moving so quickly so it keeps us on our toes and it's never boring at Nasdaq.



## Wellbeing at Nasdaq

*Senior Director, Project Manager*

Being a mother of two and raising my boys almost entirely within my time here in the organization, I can truly speak to the awesome work-life balance that Nasdaq makes possible. Our teams have a "family first" mentality and benefits like flex days and hybrid working make it easier to focus on priorities both at home and at work.



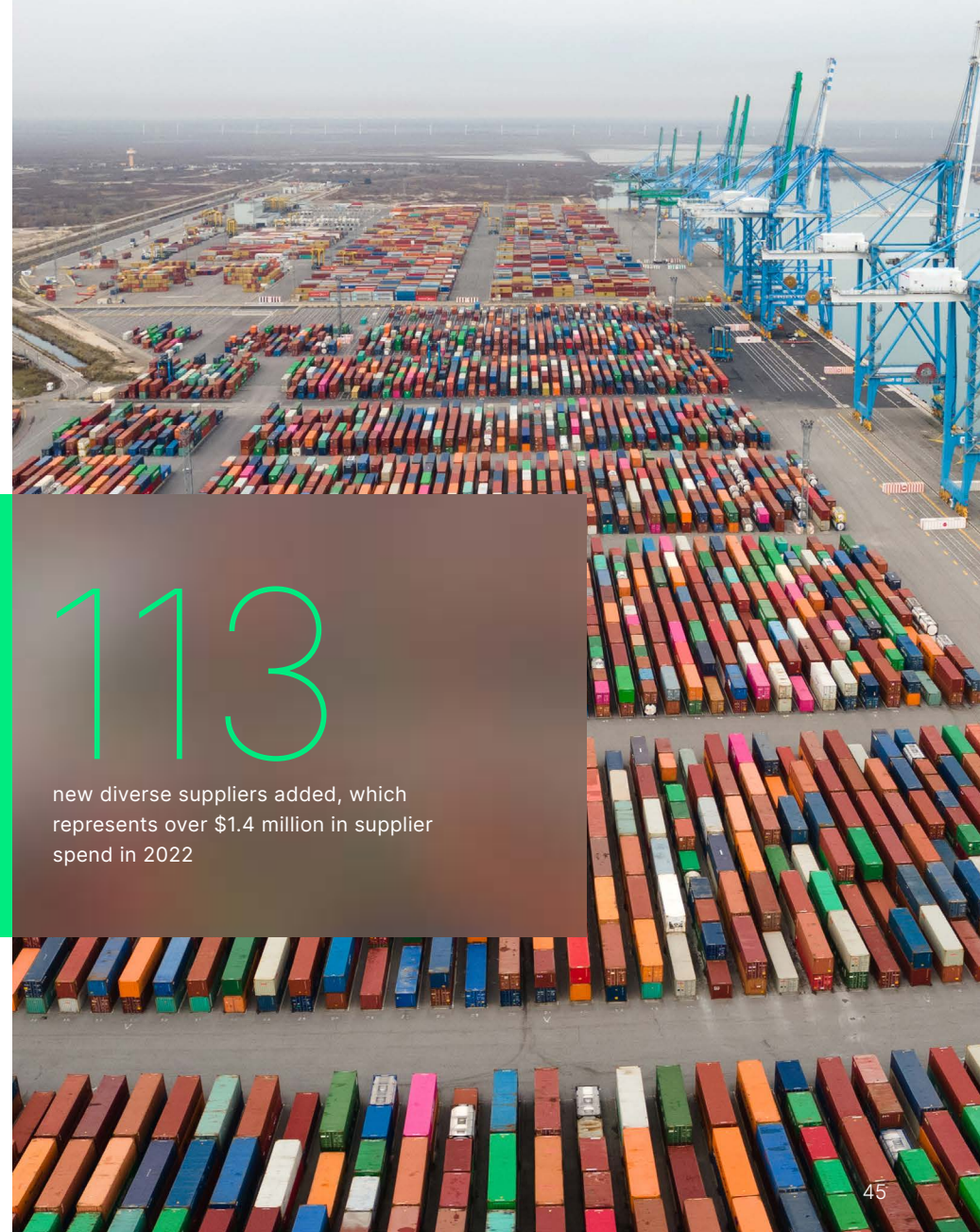
# Supplier Diversity

We recognize that increasing the use of diverse suppliers enables us to create value across our business. A diverse supply chain strengthens our operations, supports our communities and enhances our client experience. Nasdaq’s Supplier Diversity Program is a crucial component of our commitment to equity, diversity and inclusion. We work with qualified businesses owned by diverse individuals or groups, members of the LGBTQ+ community, people with disabilities, women and veterans. Nasdaq encourages its suppliers to not only promote a diverse and inclusive workplace, but also engage with diverse-owned businesses.

Nasdaq’s [Supplier Code of Ethics](#) reflects our extended commitment to growing diversity in our supply chain. In 2022, Nasdaq engaged new suppliers and existing top suppliers to attest to our Supplier Code of Ethics, confirming they have policies and practices consistent with ours and to the extent they do not, will adhere to the applicable standards in our Supplier Code of Ethics.

In 2022, we set multi-year supplier diversity goals, in terms of both spend amount and number of diverse suppliers, to demonstrate our dedication to building long-term, sustainable growth in the program. Nasdaq set a goal to increase the percent in addressable spend from U.S.-based diverse-owned suppliers from 4.3% in 2021 to 5.3% in 2022 – a goal we out-performed – achieving 6.8% in diverse supplier spend. We did so by working with supplier diversity organizations, exercising policies in our contingent worker program and leveraging configurations on our retail purchases platform to promote diverse suppliers. Through these initiatives and others, we added 113 new diverse suppliers, which represents over \$1.4 million in supplier spend in 2022. To further demonstrate our dedication to grow our Supplier Diversity Program in 2023, Nasdaq has a goal to:

- increase the percent of addressable spend with diverse-owned businesses by 0.5 percentage points to at least 7.3% and
- increase the number of addressable diverse-owned suppliers by 6% from the 2021 baseline of 121 to 128.



113

new diverse suppliers added, which represents over \$1.4 million in supplier spend in 2022

# Governance: Solidifying Corporate Excellence



Nasdaq's sound corporate governance structure is key to how we help create stronger economies, encourage more equitable opportunities and contribute to a more sustainable world to help our stakeholders reach their full potential.

Our commitment to governance excellence starts at the top with Nasdaq's Board of Directors. The Board continues to lead with a strong governance framework and is motivated to implement best practices in line with achieving strategic objectives, communicating effectively and overseeing a culture of compliance and risk management.

We believe that our long-standing and recognized tradition of principled, ethical and forward-looking governance practices, transparent disclosures and overall Board effectiveness benefits our stakeholders, including our shareholders, employees, clients and the communities around us.

**John A. Zecca**  
Chief Legal, Regulatory & Risk Officer, Nasdaq

## 2022 Highlights

#1

"Best Proxy Statement – Large Cap" in *Corporate Secretary Magazine's 2022 Corporate Governance Awards*

35+

ESG-focused Investor Engagements



Developed our first formal climate risk assessment utilizing guidance from leading reporting frameworks

2

diverse members added to the Nasdaq Listing and Hearing Review Council

4

diverse directors added to Nasdaq's Exchange Board

# Corporate Governance

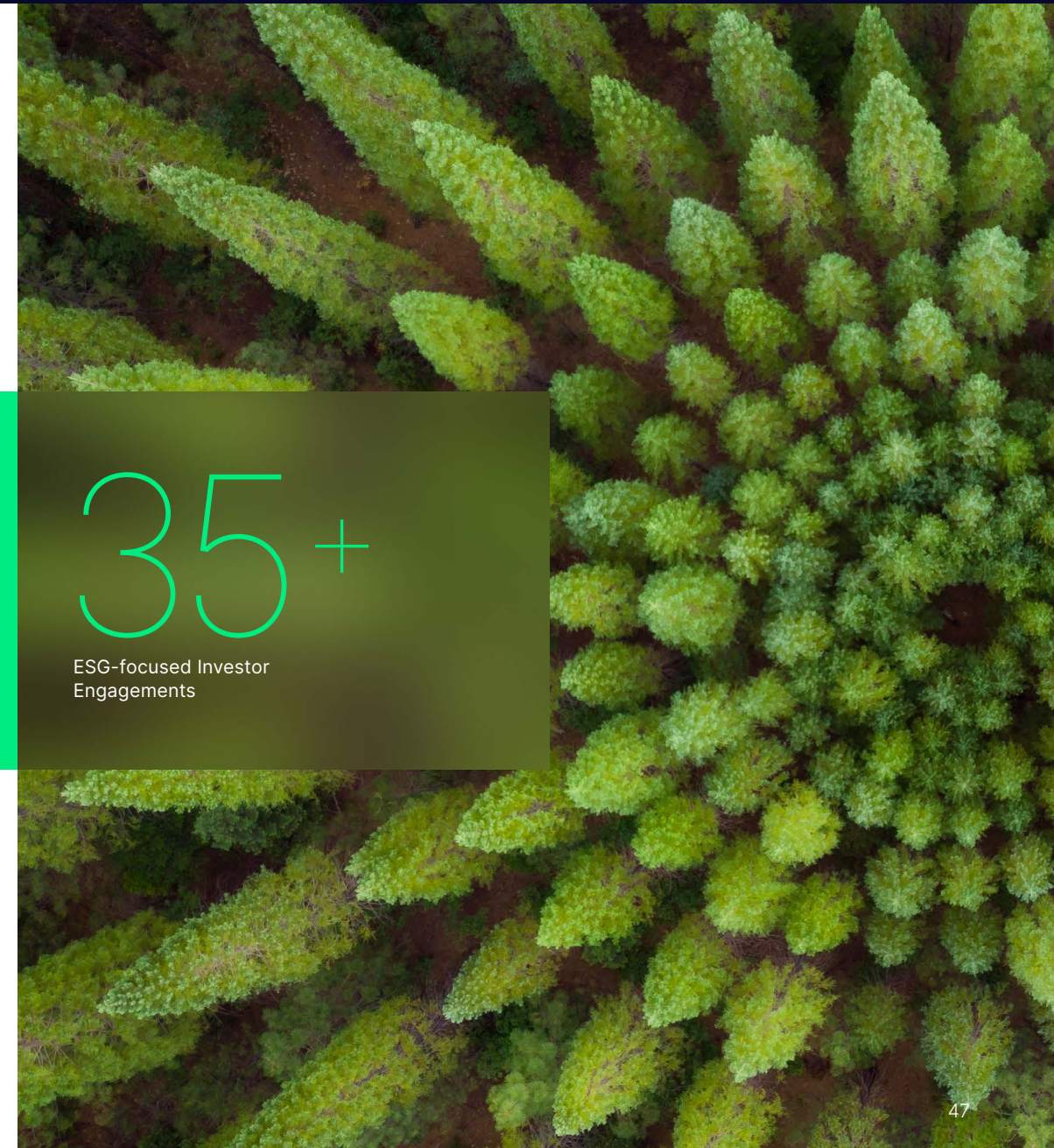
Our governance framework focuses on the interests of our shareholders. It is designed to promote governance transparency and ensure our Board has the necessary tools to review and evaluate our business operations and make decisions that are independent of management and in the best interests of our shareholders. Our goal is to align the interests of shareholders, directors and management while complying with, or exceeding, the requirements of The Nasdaq Stock Market and applicable law.

This governance framework establishes the practices our Board follows with respect to oversight of:

- corporate sustainability, including our ESG program and environmental and social initiatives;
- our corporate strategy for long-term value creation;
- capital allocation;
- risk management, including risks relating to information security and the protection of our market systems;

- our human capital management program, corporate culture initiatives and ethics program;
- our corporate governance structures, principles, and practices;
- Board refreshment and executive succession planning;
- executive compensation; and
- compliance with local regulations and laws across our business lines and geographic regions.

In 2022, we hosted over 35 investor engagements, exceeding our year-over-year goal of increasing ESG investor engagement. In addition, we maintained a low-risk rating on governance from the most significant rating agencies, included targeted disclosure on ESG in our [2023 Proxy Statement](#) to further emphasize our commitment to transparency and prioritization of ESG-related topics, and continued our program of director education on ESG topics. We aim to continue these efforts in 2023.



35+

ESG-focused Investor Engagements

# Board Diversity

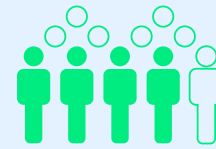
The Board values diversity in evaluating new candidates and seeks to incorporate a wide range of attributes across the Board of Directors and on each of our Committees. The following matrix is provided in accordance with applicable Nasdaq listing requirements and includes all directors as of April 28, 2023.

## Board Diversity Matrix

(As of April 28, 2023)

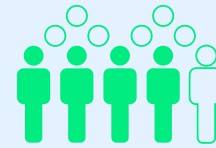
<b>Total Number of Directors</b>	<b>10</b>			
<b>Part I: Gender Identity</b>	Female	Male	Non-Binary	Undisclosed
Directors	4	6	-	-
<b>Part II: Demographic Background</b>				
African American or Black	1	1	-	-
Alaskan Native or Native American	-	-	-	-
Asian	-	-	-	-
Hispanic or Latinx	-	-	-	-
Native Hawaiian or Pacific Islander	-	-	-	-
White	3	5	-	-
Two or More Races or Ethnicities	-	-	-	-
LGBTQ+	-	-	-	-
Did Not Disclose Demographic Background	-	-	-	-

## Director Nominee Highlights



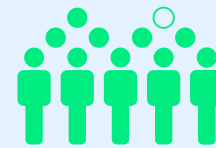
36%

4 out of 11 are women



36%

4 out of 11 are Racially/ Ethnically Diverse



91%

10 out of 11 are Independent



## Corporate Behavior

Given their relevance to our business, our industry and associated risks, we provide a brief description of our approach and policies for the following:

- Ethics and Compliance
- Anti-Corruption
- Labor Practices and Human Rights
- Anti-Financial Crime & Anti-Money Laundering
- Cybersecurity, Information Security and Privacy
- Public Policy
- Risk Management

Nasdaq leaders strive to create an ethical culture in which employees understand our commitment to integrity as foundational to our Purpose, Vision, Mission and Values and feel comfortable raising issues or concerns.

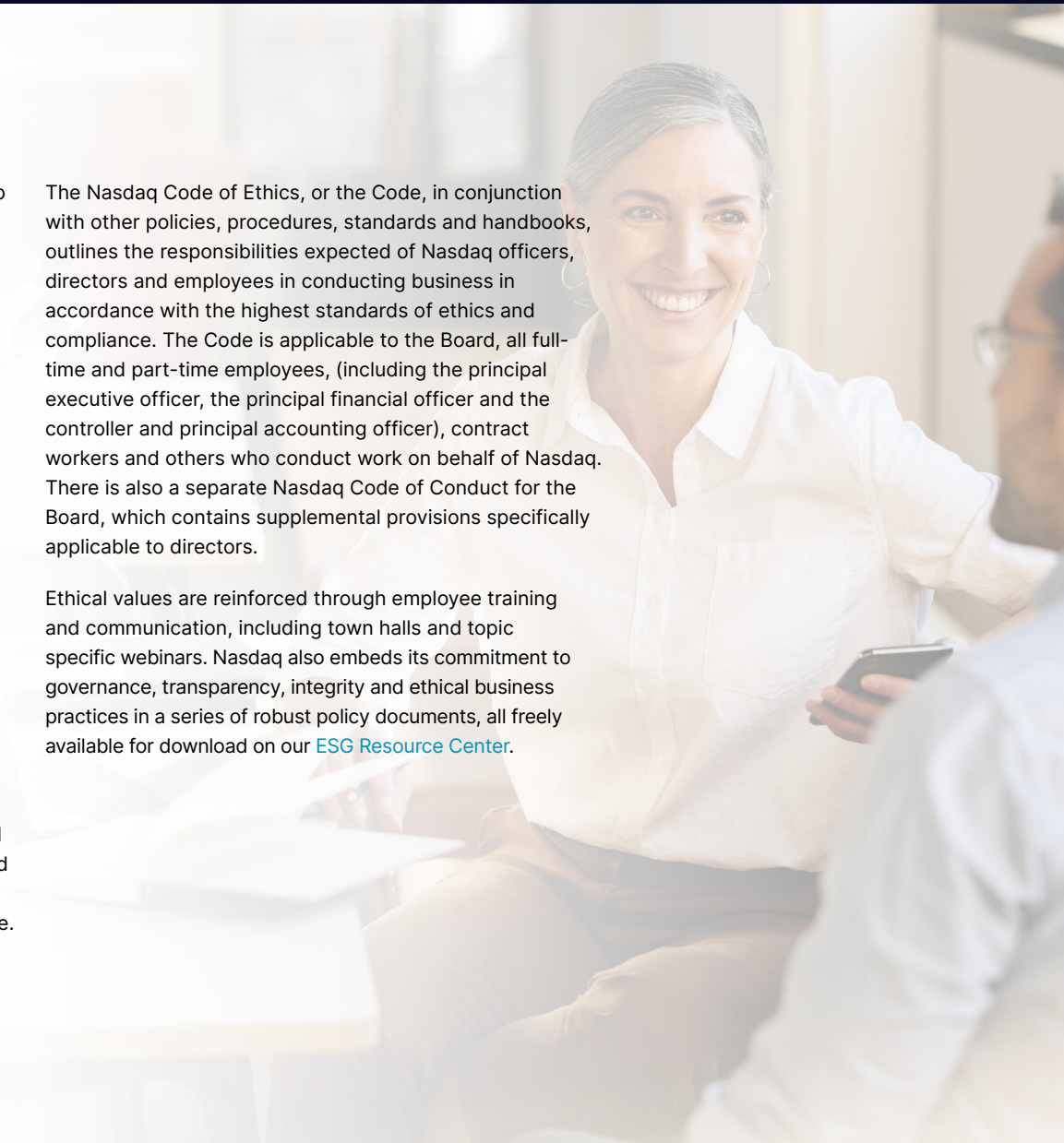
## Ethics and Compliance

The Nasdaq Ethics and Compliance Program is designed to meet or exceed applicable standards, including guidelines published by U.S. and European regulators. Nasdaq embraces good governance by striving to hold ourselves to the highest ethical standards in all interactions. Our Global Ethics Program supports and promotes meaningful implementation of the Code of Ethics throughout our business. In 2022, we furthered the use of automation and analytics in supporting compliance programs to drive effectiveness and reduce risk, completed updates of our Code of Ethics and related policies to make them more engaging to our employees and address evolutions in our business and enhanced employee training programs through additional focus on targeted topics.

Our Global Ethics program is based on industry-leading practices and led by our Chief Legal, Regulatory & Risk Officer and is supported by a cross-functional, geographically diverse team, with oversight by our Audit & Risk Committee. External compliance experts are also regularly consulted. The Nasdaq Ethics Program provides values-based guidance, heightens compliance risk awareness, strengthens decision-making and drives sound business performance through its five pillars: Executive and Board Leadership; Policies and Controls; Risk Assessment; Outreach and Training; and Monitoring, Audit and Response.

The Nasdaq Code of Ethics, or the Code, in conjunction with other policies, procedures, standards and handbooks, outlines the responsibilities expected of Nasdaq officers, directors and employees in conducting business in accordance with the highest standards of ethics and compliance. The Code is applicable to the Board, all full-time and part-time employees, (including the principal executive officer, the principal financial officer and the controller and principal accounting officer), contract workers and others who conduct work on behalf of Nasdaq. There is also a separate Nasdaq Code of Conduct for the Board, which contains supplemental provisions specifically applicable to directors.

Ethical values are reinforced through employee training and communication, including town halls and topic specific webinars. Nasdaq also embeds its commitment to governance, transparency, integrity and ethical business practices in a series of robust policy documents, all freely available for download on our [ESG Resource Center](#).



## Employee Training and Certifications

All employees are required to complete trainings and certifications on an annual basis and as part of their initial on-boarding. Training topics include:

- Ethics, Integrity and Conflicts of Interest
- Cybersecurity Awareness and Privacy
- Anti-Financial Crime & Anti-Money Laundering
- Economic Sanctions and Trade Controls
- Insider Trading
- Nasdaq’s SpeakUp! Program
- Anti-Corruption, Gifts and Business Entertainment

Employees are required, at the time of hire and annually during a set period thereafter, to complete certifications:

- Attesting to the accuracy of their financial and conflict of interest disclosures (which are required to be maintained current on an ongoing basis)
- To comply with Nasdaq’s Code of Ethics
- To comply with Nasdaq’s compliance, information security and privacy policies, including, but not limited to, Nasdaq’s policy regarding insider trading/personal securities trading (the Global Trading

Policy) and policies related to anti-corruption, sanctions and trade controls

Nasdaq provides specialized Anti-Money Laundering (AML) training for the newly hired employees of Nasdaq Central Securities Depository Stock Exchanges (CSD) covering the services offered by Nasdaq CSD, which are under the scope of applicable AML law (in Latvia and in Estonia). The training provides an overview of the goals of AML regulation, describes the rationale of the services being under AML requirements and explains the measures applied and the policies and instructions adopted by Nasdaq CSD to ensure that the services are offered in compliance with AML requirements. Nasdaq’s broker dealer group provides annual AML training for all registered representatives of our broker dealer subsidiaries. The training provides an overview of the three stages of anti-money laundering, describes the regulatory framework for U.S. AML requirements and outlines key aspects of the AML program including guidance for identifying red flags and reporting suspicious activity.

Additionally, all newly hired employees are required to complete ethics and compliance training as part of initial on-boarding and

town hall events and webinars provide detailed training to all employees on a quarterly basis. In 2022, with the lifting of pandemic travel restrictions and increased in-office attendance, these trainings were augmented with in-person training events.

### Whistleblower Program and Protections

A cornerstone of our ethics program is our SpeakUp! Program. Under our SpeakUp! Program, employees, contractors and third parties doing business with Nasdaq have multiple channels for raising ethics and compliance concerns or allegations of misconduct. These channels include directly contacting our Global Ethics Team through dedicated communications channels and reporting through our SpeakUp! Line, a whistleblower hotline that allows individuals to make anonymous reports. The SpeakUp! Line is operated by a third-party hotline provider that enables Nasdaq to communicate with an individual reporting an issue on an anonymous basis. This Program includes specific investigation procedures for notifying appropriate business management (including, where appropriate, Internal Audit and SOX compliance functions), conducting investigations, resolving matters and closing out matters

### All employees are required to complete trainings and certifications on an annual basis and as part of their initial on-boarding. Training topics include:

- Ethics, Integrity and Conflicts of Interest
- Cybersecurity Awareness and Privacy
- Anti-Money Laundering
- Economic Sanctions and Trade Controls
- Insider Trading
- Nasdaq’s SpeakUp! Program
- Anti-Corruption, Gifts and Business Entertainment

with the individual reporting the concern. In addition to the SpeakUp! Program, individuals can directly and confidentially contact our Audit & Risk Committee Chair via email or physical mail.

To foster an ethical culture where employees are supported in reporting unethical behavior, Nasdaq provides multiple channels for disclosing misconduct under our SpeakUp! Program. One element of this program — our SpeakUp! Line — enables anonymous whistleblowing as required by applicable laws and regulations. The SpeakUp! Line is operated by a third party that is strictly required to protect the anonymity of the reporting individual when requested by the individual, and the Audit & Risk Committee receives regular reports on activity on the SpeakUp! Line. Nasdaq supports employees by allowing the disclosure of trade secrets in confidence to relevant government authorities without fear of retaliation, regardless of the confidentiality or intellectual property agreements the employee has signed with Nasdaq.

Employees can contact the appropriate regulator, law enforcement, other government authorities or others as authorized by applicable law without notifying Nasdaq in advance or first pursuing internal reporting channels. Nasdaq does not tolerate retaliation and provides all legal protections afforded under applicable laws

and regulations for individuals reporting alleged misconduct or violations of the law.

**Anti-Corruption**

Nasdaq’s anti-corruption program is implemented at an enterprise, global level across all Business Units in a risk-based manner. The anti-corruption program includes policies, procedures, monitoring and periodic risk assessments aligned to leading practices and standards, including those published by the U.S. Department of Justice and The Organization for Economic Co-operation and Development (OECD). As set forth in Nasdaq’s Code of Ethics and relevant policies, we have zero-tolerance for violation of bribery and corruption laws.

Every year, the Code of Ethics and the Gifts, Business-Related Events & Anti-Bribery and Corruption Policy is reviewed with updates approved by executive management and the Board. The updated documents are communicated to all employees and certified by them on an annual basis.

Nasdaq conducts screening of all vendors and agents for corruption risk and monitors all payments, including vendor payments and employee reimbursed expenses for compliance. Nasdaq’s Supplier Code outlines our expectations for Business Partners, including those expectations related to bribery and corruption.

**Labor Practices and Human Rights**

Nasdaq believes in the fundamental dignity of every human being and the rights of every individual to live and work safely and humanely, without fear of oppression or coercion. Our Vision, Mission and Values Statements, along with our Code of Ethics, Supplier Code of Ethics and Employee Handbooks emphasize responsibility, integrity and values-based decision-making and set forth our standards for conducting our business ethically and consistently with our moral principles. These principles and standards shape our interactions with fellow employees, clients, suppliers, communities and markets around the world — and with our community of stakeholders, too.

They are foundational to our Company and enable our continued success. Reflecting Nasdaq’s obligations as a global company, Nasdaq has incorporated within its Code of Ethics, corporate policies or program-specific requirements to put these principles into practice:

- Equal Employment Opportunity and Discrimination
- Harassment
- Non-Retaliation
- Diversity & Inclusion
- Data Privacy
- Health & Safety
- Labor Standards

**Operating in Global Communities**

As a global company with operations in more than 26 countries, Nasdaq endeavors to model our principles wherever we operate, serving as a role model where we do business. Our fundamental respect for human rights informs client engagements, the work we perform, the goods and services that we purchase and how we engage with the local business community as a corporate citizen. We also learn from the communities where we live and work and seek new ways to empower economic and social wellbeing.

**Freedom of Association**

A limited number of Nasdaq’s employee population are covered by collective bargaining agreements, or represented by unions or works councils. We engage both directly with our employees and through these associations to discuss issues such as health and safety, remuneration, work hours, training, career development and mentorship, work time flexibility and equal opportunity. We communicate information related to freedom of association through various mediums, including our employee handbooks and policies, our intranet, employee network groups, periodic town hall meetings (virtual and in-person), and through emails.

**Human Rights Assessment**

In 2021, Nasdaq collaborated with an independent third-party to initiate a formal human rights assessment consistent with the United Nations Guiding Principles on Business and Human Rights (UNGP). The assessment focused on:

- outlining current expectations of financial institutions with regards to human rights;
- building internal understanding of human rights; and
- undertaking an initial, high-level gap analysis of Nasdaq’s current policies and practices against the UNGP’s, with recommendation on best practices.

Following the completion of this assessment, in 2022 we evaluated our level of potential human rights risk exposure in the high-priority areas identified by the third-party assessment and confirmed that our risk exposure is low. However, we understand that supply chains are complex and continually evolving and global human rights conditions change and we will continue our vigilant human rights due diligence. We are evaluating processes and technologies that could enable us to enhance our current risk-monitoring capabilities in the future.

**Anti-Financial Crime & Anti-Money Laundering**

As a self-regulatory organization and operator of regulated financial systems such as exchanges, a clearinghouse and central securities depositories, Nasdaq is deeply committed to ensuring that markets operate fairly and do not facilitate financial crime, including money laundering and terrorism financing. Nasdaq’s Code of Ethics, Trade Controls and Sanctions Compliance Policy and Global Anti-Money Laundering (AML) Policy, as well as applicable regional policies require compliance with all AML laws and regulations that apply to our business. For covered operations, this includes conducting any required know-your-customer (KYC) due diligence, monitoring transactions and reporting suspicious activities. Nasdaq is committed to detecting and deterring money laundering and terrorism financing. Following the onboarding, Nasdaq conducts continuous screening of our prospects, customers and suppliers against various compliance watchlists, including terrorist and terrorism-financing lists. Nasdaq retains all records related to third party due diligence, transactions monitoring and reporting in accordance with our records retention procedures. Additionally, Nasdaq mandates all employees reserve all records and documentation related to an existent or

a potential investigation into anti-bribery/ corruption, sanctions, trade control, AML or other violation(s) of financial crime laws, including all emails, voicemails, text messages, paper documents, records and files, electronic documents, records and files.

Members of Nasdaq’s exchanges are required to have in place AML and other diligence programs to screen their clients and market participants in accordance with the applicable U.S. and EU laws and regulations. In addition to legal requirements related to AML, Nasdaq is implementing a risk-based anti-financial crime framework in key business segments to augment its compliance programs.

Across our global enterprise, Nasdaq has implemented comprehensive policies and screening programs to enable compliance with economic sanctions that apply to its business. This includes screening all customers, vendors and other business partners against applicable sanctions lists such as those published by the United Nations, U.S. Department of Treasury, Office of Foreign Assets Control, the European Union and the United Kingdom along with other jurisdictions where Nasdaq operates. Nasdaq has appointed senior level employees to oversee its sanctions compliance program and reviews its sanction compliance policy annually with its Board of Directors. In 2022, Nasdaq delivered mandatory high-level

sanctions and AML compliance training to all of its employees and, in 2023, is planning to provide targeted in-depth training for employees in the Sales and Accounting functions.

In operating our markets, Nasdaq maintains robust surveillance teams that monitor our markets for potential suspicious trading activity and compliance with our market rules. Our surveillance teams use sophisticated software that leverages models and analytics to identify suspected risks, which are then escalated and reviewed. Nasdaq cooperates with the Securities and Exchange Commission, financial supervisory authorities, Financial Industry Regulatory Authority, The European Securities and Markets Authority and other exchanges to address suspected violations and to deter, identify and prosecute unlawful activity affecting the securities market. Nasdaq also licenses its technology to regulators and financial firms to help them monitor their markets and activity.

Nasdaq believes it is important for our employees to stay informed regarding the latest developments in anti-financial crime and money laundering and provides regular updates and training sessions on this topic. In 2023, we aim to continue enhancing information on our public website regarding anti-financial crime and privacy programs.

# Cybersecurity, Information Security and Privacy

## Oversight

Cybersecurity is an integral part of risk management at Nasdaq. The Information Security Department is responsible for coordinating the protection of our core business operations and information against real-world cyber threats by employing technology, policy, processes, education programs and sound design techniques across the organization. Nasdaq's Chief Information Security Officer (CISO) who reports directly to Nasdaq's Chief Information Officer within Nasdaq's centralized Global Technology organization manages the Information Security Department (ISD).

The ISD team is responsible for:

- performing and coordinating security assessments and vulnerability scans of Nasdaq's internal, external and third-party applications;
- implementing and maintaining Nasdaq's various information security-related policies and standards;
- middleware and vulnerability management in addition to special projects as designated by the CISO;

- Nasdaq's compliance efforts for General Data Protection Regulation (GDPR) and all supporting data privacy and protection efforts;
- configuring Nasdaq Group infrastructure and the applications running thereon in accordance with Nasdaq's configurations policies, processes and standards;
- development of internal tools and solutions to drive efficiency and enhance monitoring and visibility through operational metrics and compliance operating Nasdaq's Global Security Operations Center, which monitors security event logs, 24/7/365, from Nasdaq networks, systems, applications and databases and creates log files of known and unknown events; and
- monitoring threats against Nasdaq, its technology stack and its peer organizations and providing recommendations for securing potentially vulnerable populations at Nasdaq in the context of emerging threats.

The ISD in collaboration with the Legal, Regulatory and Risk Group is responsible for coordinating Nasdaq's Privacy Program. This includes compliance efforts related

to the European and UK General Data Protection Regulation and global privacy laws and regulations. To support its GDPR compliance program, Nasdaq has appointed an independent Data Protection Officer for its European regulated business entities.

On an annual basis, the Information Security team reviews and updates its governance documents, such as the Information Security Charter, the Information Security Policy and the Information Security Program Plan and then presents the revised documents to the Audit & Risk Committee for review and/or approval.

Our Audit & Risk Committee receives quarterly reports, as well as additional reports as needed, on cybersecurity and information security matters from our CISO. This regular reporting includes a cybersecurity dashboard that contains information on cybersecurity governance processes, the status of projects to strengthen internal cybersecurity, ongoing prevention and mitigation efforts, security features of the products and services we provide our customers, and the results of security breach simulations. The Audit & Risk Committee also discusses recent

Cybersecurity is an integral part of risk management at Nasdaq

incidents throughout the industry and the emerging threat landscape.

Additionally, during 2022, the Information Security team continued to execute on the Cybersecurity Strategic Plan, which outlines the strategic vision and associated goals for the cybersecurity of Nasdaq's global operations for the three-year period from 2020 through the end of 2022. We completed the projects tied to the 2020-2022 Strategic Plan and Nasdaq Information Security is in the process of creating the 2023-2025 Strategic Plan, which will be presented to the Audit & Risk Committee.

The Nasdaq Information Security Management System (ISMS) that governs the global enterprise infrastructure and supports key global information security processes and includes technology, personnel, locations and data centers, conforms to ISO 27001 requirements and is ISO 27001 certified. The processes in scope for the Nasdaq ISO 27001 certification include: Access Management, Human Resources, Product Development Lifecycle (PDLC), Change Management, Supplier Risk Management, Configuration/Build Management, Asset Management, Incident Management, Physical Security, Security Operations, Risk Assessment, Internal Audit, Disaster Recovery, Scanning,

Backup/Restore and Application Security. Nasdaq personnel corporate equipment and connectivity to the production infrastructure are also in scope. Additionally, a variety of Nasdaq products (8+) undergo an annual SOC 2 Type II audit. The final reports are made available to customers under non-disclosure agreements.

**Information Security Policies, Procedures and Practices**

As set forth in the Nasdaq Code of Ethics and relevant company policies, Nasdaq personnel are expected to protect and secure the confidentiality of non-public information that they receive access to or create in connection with their work at the company. This expectation includes adhering to any laws, regulations and non-disclosure agreements that restrict the use of data (including personal data), require measures to safeguard it and limit disclosure of information. Nasdaq policies also require that personnel limit their use of information technology assets (e.g., laptops, phones and other devices) to permitted activities to avoid putting data at risk and that they promptly report any suspected improper use or potential disclosure of data.

Nasdaq has numerous policies in place to further safeguard our technology and use thereof, including:

- Acceptable Use Policy;
- Data Classification Policy;
- Information Security Policy; and
- Mobile Device Policy.

We are committed to appropriately securing non-public data used as part of our business operations, including information that Nasdaq generates in the performance of its services and data provided to us by third parties, including customers, vendors, business partners, employees and other stakeholders.

This commitment is reflected in our culture of security, our policies and procedures for data systems and processing activities, our mechanisms for monitoring our information systems and data use, the security awareness and role-based training that we provide to staff on data protection and the team of skilled information security and technology professionals who design, protect and maintain our information systems.

Employees, contractors and service providers are required to sign confidentiality agreements, which prohibit them from disclosing any confidential information learned during the course of their employment or performance of services for Nasdaq.



We are committed to appropriately securing non-public data used as part of our business operations

We provide training on information security to our employees on a regular basis. This includes annual mandatory training on information security awareness and privacy. We provide tailored information security training sessions to multiple audiences.

**Auditing Compliance**

As a publicly traded company, we are required to adhere to the Listing Rules for our exchange. This includes being audited by an independent public accountant that is registered as a public accounting firm with the Public Company Accounting Oversight Board, as provided for in Section 102 of the Sarbanes-Oxley Act of 2002 [15 U.S.C. 7212].

Internal Audit periodically audits against the Code of Ethics and ethical standards at the Company.

**Internal Audit Methodology**

All Nasdaq operations are subject to audit and are organized into business-based portfolios of audit entities comprising an audit universe that is covered on a risk-based rotational basis (i.e., High: annually, Medium: every 2-3 years and Low: every 3-4 years) to confirm that every entity is subjected to audit at least once within a four-year period. An annual risk assessment is performed to identify, categorize and prioritize the business processes and

risks within Nasdaq, as well as assess the inherent and residual risk for each of the business processes. Additionally, fraud is considered in each audit performed.

**Incident Response and Management Policy**

Nasdaq’s Incident Management Policy governs all incidents, including security incidents, that cause or could potentially cause an interruption to or reduction in the quality and/or availability of a Nasdaq production service. The primary goals of the policy are to restore normal service operation as quickly as possible, provide timely and accurate communication to relevant stakeholders and minimize the adverse impact of an incident on business operations and/or the quality of provided services. Nasdaq employs a multi-layered team structure to manage incidents with established roles and escalation procedures.

**Data Privacy**

Nasdaq appreciates the special obligations that apply to processing personal data and individuals’ rights to privacy and personal data protection. Reflecting the unique risks and potential harm posed by mishandling or misuse of personal data, Nasdaq’s privacy program builds on the foundation of our information security

program to apply special governance, policies, procedures and training on the use, handling and processing of personal data and performance of activities that impact privacy rights (as determined by the jurisdictions in which we operate). Nasdaq’s privacy compliance program is designed to enable adherence to laws and regulations applicable to personal data that it processes, including, as applicable, the GDPR and the California Consumer Privacy Act, as well as its posted [Privacy Policy](#) and contractual commitments to customers, vendors and other counterparties.

To support these principles, Nasdaq maintains a comprehensive and consistent set of information security documentation and requirements intended to protect the security, reliability, integrity, accuracy, confidentiality and availability of Nasdaq information assets. These documents record the security controls and personnel responsibilities established to protect Nasdaq information and information systems against both accidental and unauthorized access, modification, interference, disclosure and destruction. These include our Information Security policies, which apply to personnel (full-time and part-time employees and contractors) working for Nasdaq.

As one of our training requirements, we require employees to complete annual privacy training and certify compliance with our privacy policies; we include privacy as part of our compliance onboarding training for new hires. In addition, we provide role-based privacy training to teams across Nasdaq. In 2022, this training included a privacy awareness “roadshow” with in-person training at each of Nasdaq’s European and UK offices.

For more information, please read our [Information Protection & Privacy Practices](#) document.

## Public Policy Advocacy

As part of our duty to shareholders, employees and the markets, Nasdaq actively participates in public policy debates in the United States, Europe and elsewhere.

Oversight of our public policy advocacy practices follows industry best practices with an internal Public Policy Committee that sets priorities and reviews Nasdaq's activities in the United States and Europe. This Committee is convened with active senior management participation on a quarterly basis. The Government Relations function and its procedures is managed at the Vice Chairman level. Nasdaq maintains a vigorous global employee education program with respect to the Foreign Corrupt Practices Act and other jurisdictional prohibitions on pay-for-play. Nasdaq does not support any political campaigns, or "Super PACs," directly with Nasdaq funds.

In the United States, Nasdaq believes it has the responsibility to use its voice to educate policymakers and regulators. Nasdaq's advocacy focuses on policies affecting the capital markets. Nasdaq concentrates its efforts on education and outreach and utilizes a modest Political Action Committee, or PAC, program known as the Nasdaq PAC.

The Nasdaq PAC is funded entirely through employee contributions and supports only federal campaigns. Nasdaq's PAC is governed by a board of employees who vote on every disbursement.

With respect to our European operations, we focus our advocacy programs on active education and engagement with elected leaders and key policymakers. Our policies in Europe follow prevailing jurisdictional law and preclude any monetary contributions to political parties, candidates or their designees.

Nasdaq maintains memberships in a number of associations around the globe that serve as important partners for our industry, clients and employees including the World Federation of Exchanges, Federation of European Securities Exchanges, U.S. Securities Markets Coalition, Equity Markets Association, Partnership for New York City, Business Roundtable, Silicon Valley Leadership Group, U.S. Chamber of Commerce, TechNet and others.





# Risk Management

## Risk Oversight

The Board’s role in risk oversight is consistent with our leadership structure, with management having day-to-day responsibility for assessing and managing the Company’s risk exposure and the Board having ultimate responsibility for overseeing risk management with a focus on the most significant risks facing the Company. The Board is assisted in meeting this responsibility by several Board Committees. The Audit & Risk Committee receives regular reports relating to operational compliance with the Company’s risk appetite and reviews any deviations.

Additionally, management provided updates to the Board throughout the year regarding various risks arising from the COVID-19 pandemic, including with respect to cybersecurity, remote work arrangements, customer implementations, the operation of our exchanges and other potential corporate performance issues.

The Board, through the Audit & Risk Committee, sets the Company’s risk appetite, which is the boundaries within which our management operates while achieving corporate objectives. In addition, the Board reviews and approves the

Company’s Enterprise Risk Management (ERM) Policy, which mandates ERM requirements and defines employees’ risk management roles and responsibilities.

## Enterprise Risk Management

Nasdaq’s Group Risk Management (GRM) Department, which is part of the Legal, Regulatory and Risk Group, oversees the ERM framework, supports its implementation and aggregates and reports risk information.

Under our ERM Policy, we employ an ERM approach that manages risk through objective and consistent identification, assessment, monitoring and measurement of significant risks across the Company. We classify risks into the following five broad categories.

- **Strategic and Business Risk:** Risk to earnings and capital arising from changes in the business environment and from adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment.
- **Financial Risk:** Risk to our financial position or ability to operate due to investment decisions and financial risk

management practices, in particular as it relates to market, credit, capital and liquidity risks.

- **Operational Risk:** Risks arising from our people, processes and systems and external causes, including (among other things) risks related to transaction errors, financial misstatements, technology, information security (including cybersecurity), engagement of third parties and maintaining business continuity.
- **Legal and Regulatory Risk:** Exposure to civil and criminal consequences — including regulatory penalties, fines, forfeiture and litigation — while conducting our business operations; including (among other things), risks related to data privacy, intellectual property, financial crime and employment law.
- **Environmental, Social and Governance Risk:** Risks arising from perceived or actual shortcomings in the management of ESG matters.

Our management has day-to-day responsibility for managing risk arising from our activities, including making decisions within stated Board-delegated

authority; ensuring employees understand their responsibilities for managing risk through a “three lines of risk management” model; and establishing internal controls as well as guidance and standards to implement the ERM policy. In the “three lines of risk management” model, the first line, consisting of the business units and expert teams (i.e., corporate support units), executes core processes and controls. The second line, consisting of the risk, control and oversight teams, sets policies and establishes frameworks to manage risks. The third line, which is the Internal Audit Department, provides an independent review of the first and second lines.

Our Global Risk Management Committee, which includes our Chair and CEO and other senior executives, assists the Board in its risk oversight role, ensuring that the ERM framework is appropriate and functioning as intended and the level of risk assumed by the Company is consistent with Nasdaq’s strategy and risk appetite.

We also have other limited-scope management risk committees that address specific risks, geographic areas and/or subsidiaries. These risk management committees, which include representatives

from Business Units and subject matter experts, monitor current and emerging risks within their purview to ensure an appropriate level of risk. Together, the various risk management committees facilitate timely escalation of issues to the Global Risk Management Committee, which escalates critical issues to the Board. These risk management committees include the following:

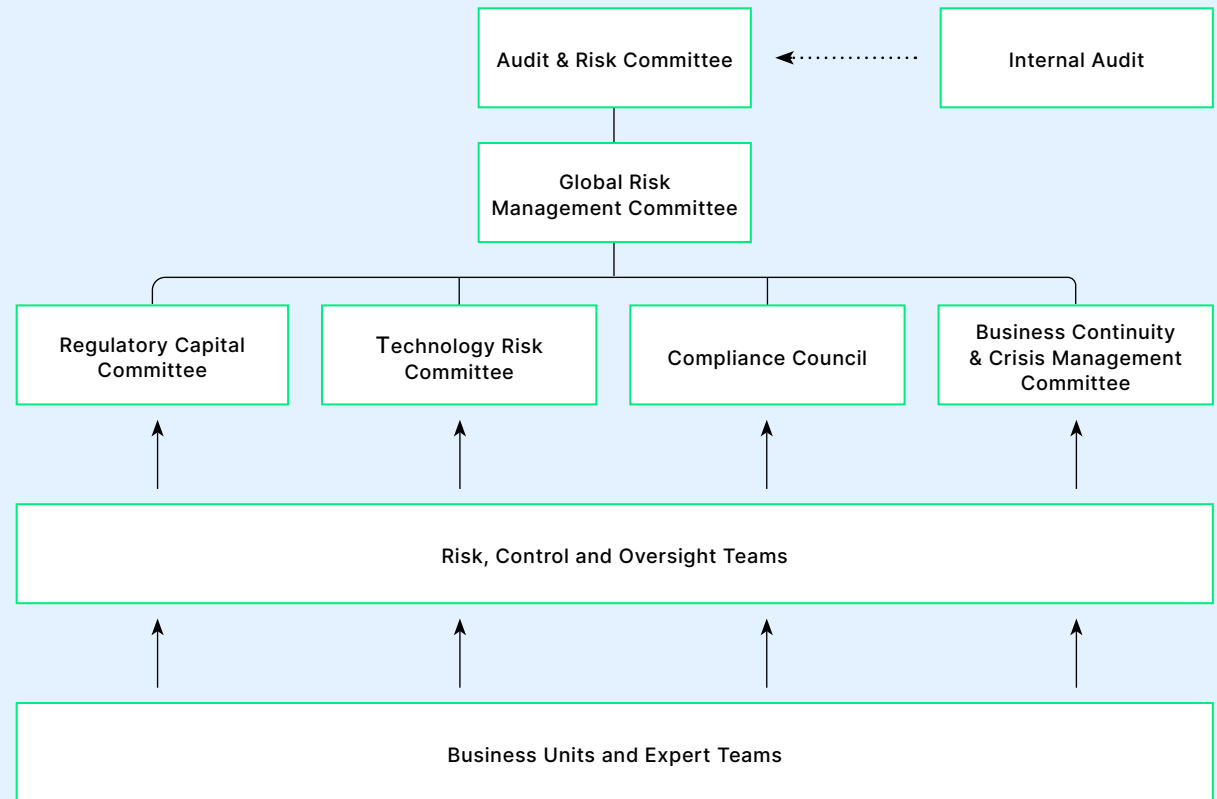
- The Nasdaq Regulatory Capital Committee oversees the global regulatory capital framework for our regulated entities and the level of regulatory capital risk.
- The Compliance Council identifies, monitors and addresses regulatory and corporate compliance risks.
- The Global Technology Risk Committee oversees technology risks within our strategic products and applications.
- The Business Continuity and Crisis Management Committee oversees business continuity and resiliency related risks.

**Managing Business Continuity**

The Business Continuity Management & Disaster Recovery Policy is approved by the GRMC and outlines the core components of the BCM Framework, including business continuity, disaster recovery and crisis management programs. The Business

BCM Framework is implemented on a local basis to support the Company’s resilience, maintain critical operations and minimize the impact of operational and physical disruptions to Nasdaq and its markets, clients, market participants, shareholders, employees and regulators. Efforts have been taken to align the BCM Program with industry best practices classified in the National Institute of Standards and Technology (NIST), the Federal Financial Institute Examination Council (FFIEC) Guidelines and ISO 22301 (International Standard for Business Continuity Management).

**Risk Oversight Organizational Structure**



# Sustainability Risk Management

## Climate-Related Risk

Nasdaq regularly evaluates climate risks that may affect our products and services, value chain, operations and investments. We perform detailed evaluations focused primarily on the types of risks that are likely to increase direct costs or interrupt our primary business functions. While we have exposure to both physical and transition drivers, transition drivers present both the most significant risks and opportunities for Nasdaq’s business, strategy and financial planning across all time horizons considered.

In accordance with the TCFD recommendations, we examined the resiliency of Nasdaq’s current strategy by conducting climate scenario analyses. Using this process, we assessed Nasdaq’s exposure to physical and transition climate-related risks and opportunities deemed as having the potential to influence our businesses, strategy and financial planning. In 2022, we updated and enhanced our climate scenario analysis by:

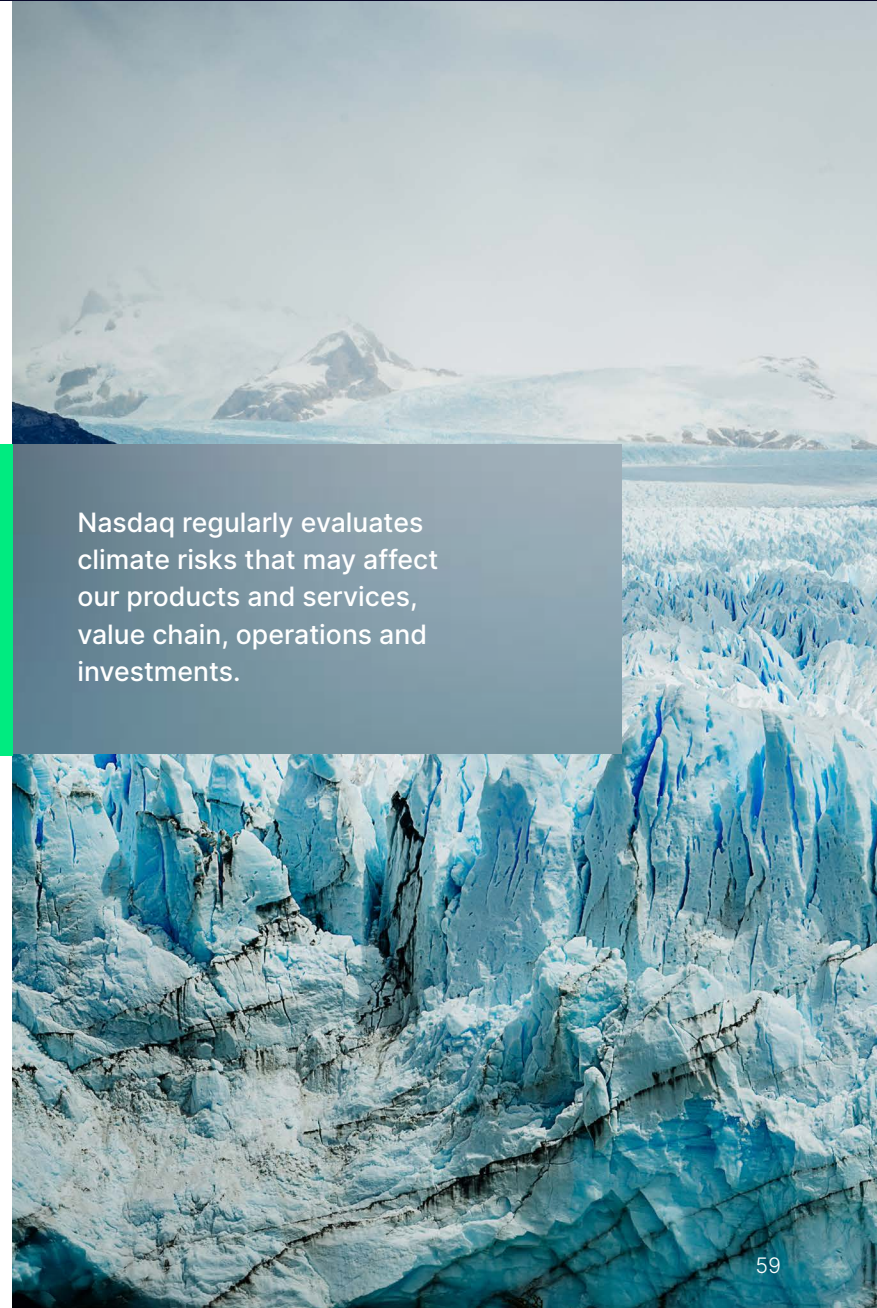
- applying the most recent transition scenarios from the Network for Greening the Financial System (NGFS)<sup>1</sup>, including two net-zero aligned scenarios;
- applying the latest physical scenarios as per Intergovernmental Panel on Climate Change’s Sixth Assessment Report (IPCC AR6);<sup>2</sup>
- including two new climate-related hazards, water stress and cyclones, in Nasdaq’s physical scenario analysis;
- updating our analysis for our entire global portfolio of offices and data centers, including new sites; and
- performing an analysis of the climate maturity of Nasdaq’s key suppliers and customers.

Our 2022 climate scenario analysis validated that our most significant climate risks and opportunities stem from transition risks, such as mandatory climate reporting requirements and transitioning to lower emissions technology. Nasdaq’s recently verified science-based targets are expected

to help mitigate some of these risks. We aim to further explore the vulnerability of our operations to the climate hazards identified in our TCFD report, to project possible financial impacts related to business disruption and identify the costs of mitigation.

As part of Nasdaq’s Bottom-Up Risk Assessments, in 2022 GRM developed its first formal climate risk assessment utilizing guidance from leading reporting frameworks such as CDP. This assessment solicited feedback on Nasdaq’s exposure to physical and transition climate risks from across Nasdaq’s Business Units and exposure stemming from Nasdaq’s key vendors. Going forward, this climate risk assessment will continue to be performed annually and will evolve in alignment with prominent climate reporting frameworks.

Our low-carbon transition plan is a key strategy as part of our efforts to mitigate our business risks associated with climate change. This plan is extensive and includes improving and maturing our



Nasdaq regularly evaluates climate risks that may affect our products and services, value chain, operations and investments.

<sup>1</sup> For more information, see <https://www.ngfs.net/ngfs-scenarios-portal/explore/>

<sup>2</sup> For more information, see [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_FullReport.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf)

GHG footprint analysis process, aligning corporate strategies to support reaching our science-based targets, implementing identified energy efficiency strategies, purchasing renewable electricity, pursuing green building certifications and engaging with our supply chain.

**Supplier Risk Management**

Nasdaq’s Supplier Engagement and Management policy contains the standards, rules and processes to be followed when engaging a supplier to provide goods and services to Nasdaq. This includes policies relating to pre-contract supplier due diligence, as well as ongoing monitoring of existing supplier relationships. Nasdaq has instituted a risk-based approach for performing due diligence on prospective suppliers. Due diligence procedures include public records screening and evaluation by relevant Nasdaq subject matter experts. Periodic assessments are performed on our third parties, particularly those that are deemed to provide critical goods and services to Nasdaq. The assessments include evaluation of the third-party’s controls relevant to the services they provide, which include, but are not limited to, their controls relating to information systems and security. Furthermore, the periodic supplier risk assessment now includes an ESG risk domain, to address environmental risks, modern slavery and diversity. Nasdaq’s Office of the General Counsel administers Nasdaq’s

Contract Review & Approval Policy, which details the legal review process for contracts entered into by Nasdaq Group companies. In accordance with Nasdaq internal processes, the Information Security Department conducts risk assessments of vendors that process Nasdaq data (including customer data) and/or have access to Nasdaq systems and works with our legal department regarding applicable vendor-appropriate contractual protections related to information security.

For more information, please see the Evaluating and Engaging Our Supply Chain (pg. 32) and the Supplier Diversity (pg. 45) sections.

## Tax Transparency

Nasdaq and all of our subsidiaries have a responsibility as a global taxpayer to accurately calculate, report and pay the Company’s corporate income taxes. Our goal is to minimize organizational tax risk exposure by staying current on tax law changes, implementing robust controls around our processes and avoiding overly aggressive tax planning strategies which would prevent the Company from paying its fair share of taxes and contributing to the economic success of countries in which we operate. We only engage in transactions with sufficient economic substance and don’t invest in tax havens for the purpose of tax avoidance.

Our Annual Report on Form 10-K for the year ended December 31, 2022 discloses Nasdaq’s total cash contribution for income taxes paid during the year. For 2022, Nasdaq paid \$274 million in taxes worldwide in corporate income taxes. For further detail, see appendix (pg. 92) for a summary by country.

Our [Public Tax Policy](#) applies to Nasdaq and all of our global subsidiaries and describes the principles that form the foundation of our approach to tax governance.



**Support** our  
Clients and **Enable**  
Positive Outcomes

# ESG Solutions: Supporting Our Clients



As stakeholder expectations evolve, many companies recognize that a good sustainability strategy means good business, whether for employees, clients, suppliers, investors, regulators or other parties. Our product strategy appreciates the diversity of needs and leverages our unique position at the intersection of investors, corporates and regulators to drive long-term value to our clients and the entire ecosystem.

We have a deep appreciation for the challenges and opportunities that corporates face in navigating the rapidly evolving demands of the capital markets and their engagement with investors, as well as increasing demand for them to develop, disclose and engage across a broadening set of ESG-focused strategies and performance metrics.

Our role is to help our clients understand these developments as well as advocate on their behalf, provide insights to both strengthen their programs and strategies as well as enhance their disclosures and communications back to their investors and the wider markets. We seek to reduce the complexity and friction our clients experience through demand-driven, market-based solutions that are pragmatic in nature.

**Nelson Griggs**  
President, Nasdaq

## 2022 Highlights

### Metrio

A Nasdaq Company

Aquired Metrio, expanding our suite of ESG Solutions



Governance Solutions launched the Nasdaq Center for Board Excellence

3.3K

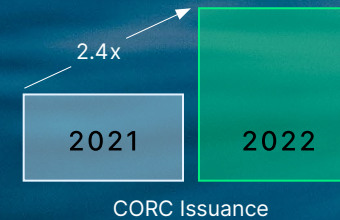
IR Intelligence provided insights & analytics software and advisory services products to nearly 3,300 companies globally

### Nasdaq OneReport

became the first GRI software provider to receive certification for the revised Universal and Topic Standards, through GRI's Certified Software and Tools Provider program

213K+

Puro.earth issued over 213,000 CORCs on behalf of suppliers representing a 2.4x year-over-year increase in issuance



▲ 27%

The number of sustainable debt instruments listed on Nasdaq Sustainable Debt Market grew by 11% and the volume of listed bonds grew by 27%

1.5K AND 14K  
issuers securities

Nasdaq Sustainable Bond Network launched functionalities to report on EU taxonomy alignment of projects financed by issuers' green and sustainable bonds and reached a coverage of more than 1,500 issuers and 14,000 securities globally

▲ 60% YoY

Nasdaq Risk Modelling for Catastrophes client base increased 60% year-over-year

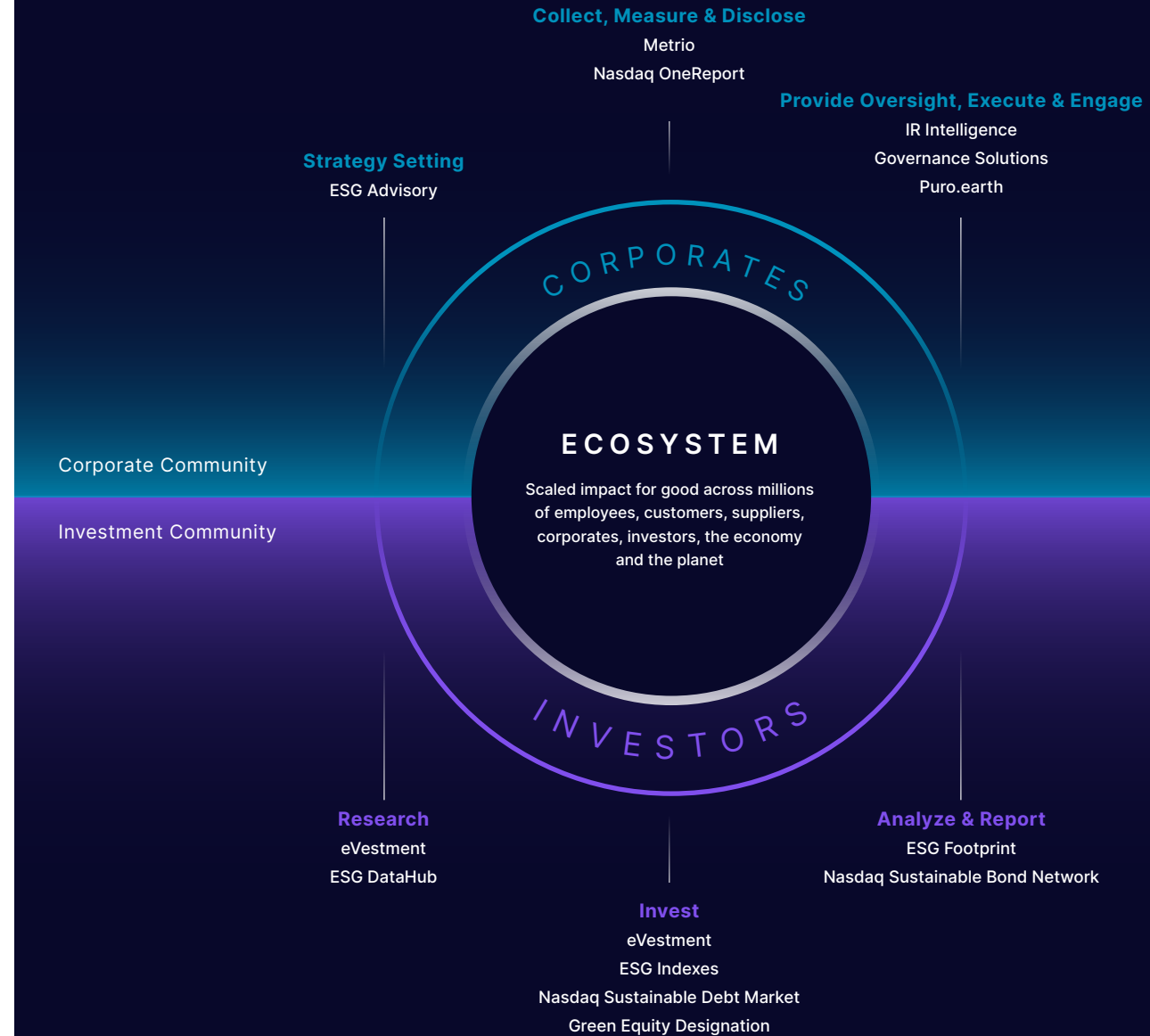
# ESG Products and Services<sup>1</sup>

Nasdaq is uniquely positioned to serve the corporate and investment communities as they strive to achieve their ESG-related objectives. Our work across both the corporate and investment communities, in addition to our work with regulators and standards setters, creates a virtuous cycle.

**Corporate Community:** We serve the corporate community throughout their ESG lifecycle, helping public companies navigate the capital markets, evolving private companies' progress to becoming public companies and engaging with all types of companies to navigate a diverse and complex shareholder landscape.

**Investment Community:** Asset owners and asset managers equally face an increasingly complex and dynamic ESG landscape. We serve the investment community with a range of workflow, data and analytics capabilities to help them manage their portfolios and enhance their asset allocation decision-making processes.

**Fostering a Culture of Education:** Leveraging our research capabilities and internal ESG subject matter expertise, we engage and support our clients by creating and sharing best practices and leading insights.



<sup>1</sup> Nasdaq's products and services discussed below include an ESG component. They are not a comprehensive list of Nasdaq's total offerings.

# Supporting the Corporate Community

## ESG Advisory

Launched as an organic growth initiative in 2019, Nasdaq's ESG Advisory is a service solution that pairs companies with consultative ESG expertise to help analyze, assess and put into action best-practice ESG programs with the goals of attracting long-term capital and enhancing value. Nasdaq's ESG Advisory practice is staffed by former ESG investors and ESG ratings agency analysts, sustainability consultants with decades of collective experience as well as individuals who ran sustainability programs in-house at Fortune 500 organizations. ESG Advisory services include ESG and climate strategy development, GHG footprinting support, Board engagement strategies, ESG investor engagement advice and ESG and climate report development support for companies.

2022 was a transformative year for Nasdaq's ESG Advisory practice as we more than doubled our headcount to meet client demand for our consultative ESG services. Headcount growth was focused on individuals with key skill sets including: banking, ESG investing, in-house corporate ESG, ESG rating agencies and ESG standard setters. 2022 also marked the first year that ESG Advisory expanded headcount into the Asia Pacific (APAC) region. In 2023, ESG Advisory plans to continue prioritizing private and public customer needs with ESG and climate related disclosure, GHG footprinting, ESG capital attraction strategies and ESG goals and target setting. As the regulatory environment heightens its disclosure requirements within the U.S., Europe and the Asia Pacific region, we're aligning our resources and competencies to help our clients navigate stakeholder demands.

## Nasdaq OneReport

Nasdaq OneReport is an ESG data management, reporting, audit trail and disclosure software that allows companies to simplify ESG reporting. It optimizes workflows, facilitates reporting to frameworks, research and ratings organizations and helps disclose ESG progress against a variety of metrics to multiple stakeholders. Nasdaq OneReport's continued advancement and evolution is driven by our customers' demands for a tool which is the industry leader in the number of frameworks and research & ratings organizations provided.

In 2022, Nasdaq OneReport became the first Global Reporting Initiative (GRI) software provider to receive

GRI certification for the revised Universal and Topic Standards, released in Fall 2021, through GRI's Certified Software and Tools Provider program. The platform also added new frameworks and ratings organizations such as the Just Capital and Bloomberg Gender Equality Index. In preparation for upcoming regulations, Nasdaq OneReport created an EU ESG Reporting Readiness Module to help support clients with EU Taxonomy, Corporate Sustainability Reporting Directive (CSRD) and Sustainable Finance Disclosure Regulation (SFDR) for organizations to easily access, share and document key organizational stakeholders. In 2023, Nasdaq OneReport plans to continue to update its platform with the latest regulatory frameworks, helping clients mitigate risks and accelerate their ESG efforts.

## Metrio

In 2022, Nasdaq acquired Metrio, expanding our suite of ESG Solutions. Metrio is an end-to-end sustainability reporting software that streamlines the way companies collect, analyze and share their ESG data. The platform is simultaneously a one source of all truth for all corporate sustainability data, with dashboards to track Key Performance Indicators (KPIs) and measure progress towards set goals, while also enabling sustainability teams to run data collection campaigns across multiple sites, locations and departments with a review process that sends task reminders, flags variations and generates an audit trail. Metrio also has built-in Corporate Social Responsibility (CSR) reporting capabilities that allows businesses to leverage their granular data and aggregate into both internal and external reports.

Nasdaq is working to combine the comprehensive capabilities of Metrio and OneReport to form an integrated ESG workflow and data management platform – Nasdaq Metrio – that will be fully scalable with products purpose-built for companies of all sizes and at every level of their sustainability and climate journey.

Metrio's platform continued to evolve with regular updates to improve the user experience, including adding new features around dashboards, data collection and a home page for a role-based overview. In 2023, Metrio plans to continue releasing new features focused on improving metrics to connect multiple data sources. This will allow increased autonomy for clients to build their own CSR reports with their own branding, while leveraging data collected across their organizations. Metrio and Nasdaq OneReport will have increasing connectivity to help clients aggregate granular data from Metrio to populate reports and disclose to regulatory bodies like the CSRD and SEC and third-party raters and rankers within Nasdaq OneReport.

Nasdaq Listings (IPO) package, approved by the SEC in 2021, provides newly public companies in the Nasdaq Global Select and the Nasdaq Global Markets with complimentary sustainability reporting support:

- Three years of OneReport
- ESG Advisory consultation
- ESG Reporting Guide



**Governance Solutions**

A strong corporate governance framework is the cornerstone of a sound ESG program. Nasdaq Governance Solutions provides a suite of technology and advisory services for boards and leadership teams to work at peak performance, facilitate major decisions, advance strategic vision and drive stakeholder value. Our solutions drive governance excellence by bringing efficiency to governance and compliance programs and fostering trusted relationships with boards and leadership teams.

In 2022, we launched the Nasdaq Center for Board Excellence, an inclusive community of board members, executive leaders and educators, offering best practices and insight into latest governance topics. The Center’s ‘ESG and Sustainability’ advisory council regularly publishes research on the evolving role of boards around ESG-related matters and how to drive action and accountability in the boardroom. In 2023, we will continue to grow an engaged community around the Center and bring governance workflow tools and services to customers to help enable effective in person or remote board meetings and discussions.

**Puro.earth**

The addition of Puro.earth – the world’s first carbon crediting platform for engineered carbon removals – to Nasdaq’s ESG solutions brings suppliers of net-negative technologies together with companies with residual emissions. Puro.earth’s high integrity carbon removals, the CO<sub>2</sub> Removal Certificate (CORC), are in line with the guidance of Oxford Principles for net zero, providing companies with a much-needed tool in their efforts to reach their net zero targets. Puro.earth is the first crediting program with a focus on durable carbon removal with a minimum of 100-year storage time to obtain endorsement by the International Carbon Reduction and Offset Alliance (ICROA).

Puro.earth issued 213,932 CORCs on behalf of suppliers in 2022, which represents 213,932 tonnes of CO<sub>2</sub> removed from the atmosphere. The issuance equals 2.4x growth from 2021. Twenty-eight new suppliers joined the platform during 2022, bringing the total number of suppliers to 80 from 18 countries. Puro.earth also launched two new removal methods during 2022: Enhanced Rock Weathering and Biomass Burial. The number of sales channel firms and traders who sell CORCs to their clients has grown during the year.

In 2022, Puro.earth also increased transparency in the carbon removal market through improvements in the Puro Registry and the Carbon Removal Reference Price Indexes. Integrity, trust and transparency around CORCs are key factors needed for building a global market for carbon removals. A well-functioning market will bring efficiency and necessary price signals to stakeholders.

Given the strong demand by corporate buyers for high quality carbon removals, Puro.earth plans to further expand the volume of issued and retired CORCs on the Puro.earth platform. Puro.earth aims to launch additional carbon removal methods, subject to scientific review and approval by the Advisory Board of Puro.earth.<sup>1</sup>

<sup>1</sup> The Advisory Board is ensuring high credit-level integrity and robust principles for science-based carbon removal verification and is authorized by Puro.earth’s Board of Directors to manage the Puro.earth Standard and Crediting Rules. Puro.earth Standard and Crediting Rules include project eligibility rules, quantification of carbon removal, validation and verification rules, conditions for issuance and retirement of credits. The Advisory Board is chaired by Myles Allen, professor of Geosystem Science in the School of Geography and the Environment at the University of Oxford and the director of Oxford Net Zero Initiative. The Advisory Board are independent and non-executive, meaning they are not Puro.earth employees.



## Nasdaq Products and Services with Select ESG Features<sup>1</sup>

### Nasdaq Risk Modeling for Catastrophes

Nasdaq Risk Modelling for Catastrophes is the first independent, multi-vendor risk modelling solution for reinsurance firms. It brings multiple catastrophe risk model providers together on one independent platform, lowering the barriers to entry for model vendors while providing ease of access and increased choice to the market. The platform, powered by the open-source Oasis Loss Modelling Framework, makes it possible for clients to access and deploy a wide range of models without the need for multiple modelling platforms. With a broad range of catastrophe risk models across multiple geographies, for perils including flood, earthquake, hurricane, windstorm, bushfire and more, exposure management teams can quickly evaluate and apply the models that align with their business needs.

In 2022, Nasdaq Risk Modelling for Catastrophes' client base increased by 60% from 2021, fueled by a desire by re/insurers to improve their view of risk around

complex perils such as flooding. There is growing demand among the risk management community for tools that assess climate-related physical risks. Catastrophe models that contain climate conditioned events will play a valuable role in this regard. Nasdaq Risk Modelling for Catastrophes provides access to models that combine science, engineering and probabilistic modelling to help clients quantify the financial impact of climate change in terms of the damage to property caused by natural catastrophe events.

### IR Intelligence

Investor Relations Intelligence (IR Intelligence) is a business within our Capital Access Platforms segment, which provides insights and analytics software and advisory services products to nearly 3,300 companies globally with the mission to help clients effectively navigate the capital markets. In 2022, IR Intelligence focused on providing transparency into sustainable and climate strategies through IR Insight and shareholder advisory

services with ownership benchmarking, as well as advancing companies' understanding of their shareholders' ESG preferences through our Global Perception service. In 2022, IR Intelligence produced research on sustainable investing trends, as well as proprietary research on [corporate climate disclosure](#) trends. In 2023, we plan to expand upon this foundation to provide companies with insight and analytics tools to monitor ESG trends, assess competitive positioning through benchmarking of ESG disclosures and craft ESG disclosures as companies strive to meet increasing demands from investors and global regulators.

<sup>1</sup> Not categorized as ESG products and services for financial reporting.

# Supporting the Investment Community

## ESG Indexes

The OMX Stockholm 30 ESG Responsible Index (OMXS30ESG), introduced worldwide in June 2018, was the first ESG version of an established exchange benchmark. It was followed by the listing of ESG index futures contracts in November 2018. The OMXS30ESG is an ESG responsible version of the OMX Stockholm 30 Index, which is the leading share index on Nasdaq Stockholm. The OMXS30ESG is based on OMXS30, which consists of the 30 most traded securities on Nasdaq Stockholm, followed by a systematic criteria-based ESG screening where securities that fail the criteria are excluded. The OMXS30ESG Index is a market cap weighted index.

The liquidity of its constituents results in a highly suitable underlying benchmark for derivatives products. In addition, the OMXS30ESG is also designed to be used for structured products, such as warrants, index bonds options, exchange traded funds and other non-standardized derivatives products. The composition of the OMXS30ESG index is evaluated twice a year, at the beginning of January and July. In November 2021, Nasdaq expanded its

ESG derivative offering with the listing of options based on the OMXS30ESG Index.

We manage dozens of indexes that integrate ESG criteria into the index methodology. We achieve this in a variety of ways, with some indexes designed purely as ESG and others designed with ESG criteria as an overlay to a broader investment thesis. The index with the largest tracking fund is the ISE Cyber Security Index. Others include the OMX Helsinki 25 ESG Responsible Index, the OMX Copenhagen 25 ESG Responsible Index and the Nasdaq Future Global Sustainability Leaders Index. In 2021, we created ESG versions of two of our flagship indexes and now offer the Nasdaq 100 ESG Index and the Nasdaq Next Generation 100 ESG Index.

## Green Equity Designations<sup>1</sup>

Nasdaq launched Green Equity Designations on the Nordic markets in 2021 in response to increased demand for sustainable investments and extensive growth in Nasdaq Sustainable Bond Markets. With issuers and investors searching for more green performance indicators on the equity market, Green Equity Designations aim to enable visibility and transparency

for investors with two voluntary designations, Nasdaq Green Equity Designation and Nasdaq Green Equity Transition Designation. Through Green Equity Designations, Nasdaq can support environmentally sustainable companies or companies committed to transition to increase their visibility, transparency and credibility towards investors, business and other stakeholders.

The Nasdaq Green Equity Designation is currently available for companies on the Nasdaq Nordic stock exchanges. As the financial ecosystem anticipates upcoming sustainability and climate-related regulations, Nasdaq may see increasing interest in green equity classification from companies and investors outside the Nasdaq Nordic exchanges. In March 2023, the World Federation of Exchanges (WFE) launched its classification standard for Green Equity with reference to the existing model from Nasdaq's Green Equity Designation, highlighting Green Equity Designation's importance in helping investors assess companies that are generating revenue from products and services that contribute to positive environmental outcomes.

<sup>1</sup> Green Equity Designations are only available on Nasdaq Nordic stock exchanges.



### Nasdaq Sustainable Bond Network

The Nasdaq Sustainable Bond Network, launched in late 2019, is a global platform that aims to increase transparency for environmental, social and sustainable bonds. The Nasdaq Sustainable Bond Network connects issuers of sustainable bonds with investors, empowering them to evaluate impact and make informed investment decisions on sustainable bonds. The platform allows issuers of sustainable bonds to make their sustainable bond data more accessible to investors and other stakeholders. Investors can in turn use the platform to evaluate, track and create impact reports based on issuers' ESG bond reporting. The database simplifies sustainable investing with an intuitive, easy-to-use solution that allows investors to discover, compile and compare sustainable bonds as well as generate impact reports. The platform also provides issuer-level information on UN Sustainable Development Goals allocation.

In 2022, we launched functionalities that report on the EU taxonomy alignment of projects financed by issuers' green and sustainable bonds. Furthermore, we reached coverage of more than 1,500 issuers and 14,000 securities globally.

Investors in sustainable bonds are increasingly reporting on the impact of their investments and how their proceeds are allocated. We expect this trend to continue while seeing a larger incorporation of issuer-reported sustainable bond data in investment due diligence.

#### Total Number of Issuers and Bonds on the Nasdaq Sustainable Bond Network

As of December 31	2022	2021	2020
Issuers	1,550	1,012	323
Bonds	14,222	8,928	4,600



1,550  
Total issuers

14,000+  
Bonds listed

88  
Countries represented globally on our network

### Nasdaq Sustainable Debt Market

The Nasdaq Sustainable Debt Market is comprised of dedicated segments for listing green, social, sustainability and sustainability-linked bonds, structured products and commercial papers.

Our sustainable debt markets are designed to highlight sustainable investment opportunities to investors with a green, social or sustainable investment agenda. It is open to all types of issuers that are looking to issue securities that meet our listing criteria, which are based on the green and social bond principles as well as the sustainability-linked bond principles, for which the International Capital Markets Association (ICMA) acts as a secretariat.

#### Number of Listings and Issuers on the Sustainable Debt Market

As of December 31	2022	2021 <sup>1</sup>	2020 <sup>1</sup>
Listings	471	424	293
Issuers	129	108	78

<sup>1</sup> 2021 and 2020 figures have been restated as a result of double-counting issuers with debt instruments on several markets and to account for all Nasdaq European exchanges.

Macro-economic factors had a negative effect on the Nordic debt markets in 2022 but sustainable debt markets continued to grow, emphasizing the increasing importance of sustainability throughout the financial markets. The number of sustainable debt instruments listed on Nasdaq grew by 11% during 2022 and the volume of listed bonds grew by 27%. The growth was mainly driven by new, large issuers joining the market (e.g., the inaugural Danish sovereign green bond listed on Nasdaq Copenhagen), as well as a wider adoption of sustainability-linked bonds in the Nordic region. Sustainability-linked bonds allow issuers that lack large capex but have set out ambitious sustainability targets to join the broader sustainable debt markets and can spur the overall markets' growth in the coming years by allowing new sectors to participate.



growth in the number of sustainable debt instruments listed on Nasdaq during 2022

## ESG Data Hub

ESG Data Hub is a data solution offering investors and other stakeholders easy access to a wide range of comprehensive ESG data sets, accompanied by detailed product descriptions, selling points and use cases. The platform enables users to find data sets relevant to specific UN Sustainable Development Goals (SDGs) providing investors with visibility on the ESG impacts of their investments. Data sets within the product are wide ranging – they assist our customers with their own projects and the impact is at the customer level.

Demand for the data is driven by a customer move away from broad ratings and instead a move towards understanding in granular detail the different aspects of ESG. For many customers, ratings no longer give a representative picture of a company's complete ESG picture. The move towards granular data sets started in 2022 and remains a growing segment.

In 2022, we added several new data sets to the product from third party providers. We also added our sustainable bond network data to the platform. For 2023, we continue to look for unique data partners to add to the solution, based on feedback and the needs of customers. We plan to integrate ESG data into our broader data marketplace, Nasdaq DataLink.

## ESG Footprint

ESG Footprint is an easy-to-implement platform that measures the global sustainability effect of a portfolio and individual securities. Through an intuitive dashboard, investors and managers have access to the real-life effects of each investment, along with alternatives that may better suit an individual's sustainability goals.

The tool gives investors insight into positive and negative flags for companies within their holdings depending on criteria set by the customer. We have seen growing demand for regulatory solutions, particularly SFDR and EU Taxonomy.

Within ESG Footprint, there are multiple datasets that provide insight into the core impact of business and investment opportunities on SDGs. These datasets (SDG Signals, SDG Fundamentals, SDG CAPX) allow investors to evaluate companies' alignment against the SDG framework.

In 2022, we added functionality that helps customers meet their SFDR requirements. In addition, we launched the product with a group of 20 banks in Denmark that are providing SFDR overlays for all their retail customers. In 2023, we continue to invest in the product and are looking to add an EU Taxonomy overlay while continually improving data quality.

## Nasdaq Products and Services with Select ESG Features<sup>1</sup>

### eVestment Diversity & Inclusion (D&I) and ESG Data in Asset Management

eVestment is a leading institutional investment database and analytics platform acquired by Nasdaq in 2017. To meet increasing demand for transparent and standardized D&I and ESG data from institutional stakeholders, eVestment launched multiple initiatives to provide a centralized resource in collaboration with consultants, asset managers, asset owners and key industry organizations. We partner with key industry partners to enhance the platform's breadth of data.

<sup>1</sup> Not categorized as ESG products and services for financial reporting.



### D&I Data

eVestment began collecting D&I data in collaboration with the Institutional Investing Diversity Cooperative (IIDC) in 2021. The D&I questionnaire gives asset managers an opportunity to provide narrative commentary on their firms' D&I initiatives and statistics. In partnership with FCLTGlobal and the Institutional Limited Partners Association (ILPA), eVestment also created a new diversity metrics template and data collection capabilities for its private markets reporting solutions in 2022. The data includes information on diversity metrics for investment company firm ownership, investment committee members and investment professionals, as well as aggregated diversity metrics for board and senior management of a fund's portfolio companies.

### ESG Data

In 2020, eVestment launched an ESG questionnaire to power robust investment research providing opportunity for asset managers to articulate their approach to ESG with compelling proof points. In 2022, the questionnaire was expanded with major enhancements to the proxy voting and engagement data designed to better understand process and outcome, add more questions around alignment (SDGs and SFDR) as well as introduce new climate sections at both the firm and the product level. To date, more than 50% of active products on eVestment are providing responses to the ESG questionnaire, while about 45% of firms are providing firm level information. Usage of eVestment's ESG data has tripled since the 2020 questionnaire rewrite, reflecting not only the increased value of the data, but the increased importance of ESG data in the investing landscape.

# Supporting Clients through Research and Education

Throughout 2022, we coordinated several events and leveraged our expertise and research capabilities to publish thought leadership on a range of relevant topics. On our [ESG Solutions Resource Center](#), we united our knowledge and insights to support our corporate and investor communities as they seek to accelerate sustainable, inclusive growth. For examples of our research and educational materials, please see Nasdaq's Expert Insights and Quarterly ESG Trend Reports on the right.

In our [Green Voices Newsletter](#), we gathered our latest updates, insights and inspiration on all things ESG, facilitating a continuous dialogue between investors, issuers and other stakeholders. Topics covered by the Green Voices Newsletter include:

- ESG & Climate Trends
- Carbon Removal
- Net-Zero Strategies
- ESG Data & Reporting
- The Green Transition
- Nasdaq's quarterly ESG Trends Reports

28

white papers authored to share ESG-insights with the industry

4

ESG Trendsetters episodes were published to facilitate sharing of best practices in ESG and sustainability

43

panel discussions and industry events were led to encourage innovation and progress in sustainability practices

## Our Expert Insights

### Webinar

#### Demystifying ESG Raters: An Insider's Perspective on Improving Your Score

WATCH THE WEBINAR →

### Guide

#### Buyer's Guide to ESG Data Management, Reporting, Assurance & Disclosure Software

DOWNLOAD THE GUIDE →

### Report

#### Dissecting the ESG Landscape: A Nasdaq & Corporate Board Member Report

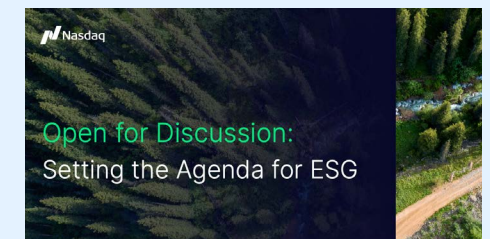
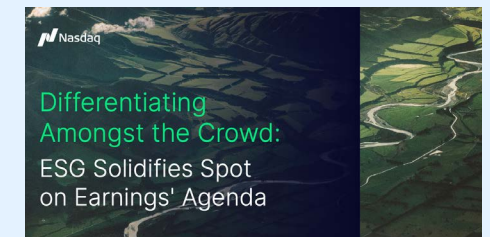
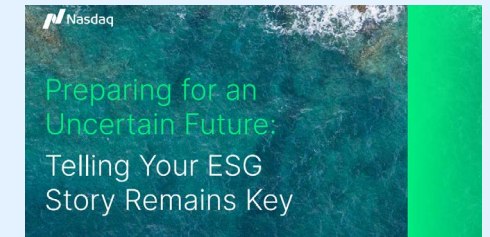
DOWNLOAD THE REPORT →

### Whitepaper

#### Lessons for Early Stage Reporters

DOWNLOAD THE WHITEPAPER →

## Our Quarterly 2022 ESG Trends Reports





# Community Engagement: Enabling Positive Outcomes



In a year marked by constant change, Nasdaq remained committed to our Purpose. In 2022, through strategic initiatives and thoughtful partnerships, we delivered over \$6,000,000 in impact; an investment that accelerated our efforts globally, strengthened our Foundation footprint and moved us that much closer to a more sustainable and prosperous future for all.

**Jailan Griffiths**  
Vice President and Global Head of Purpose, Nasdaq

## 2022 Highlights

1.5K

hours volunteered by employees

11

partnership organizations supported through Nasdaq's Quarterly Grant Program

3

partnership organizations selected for Nasdaq Foundation's New Investor Initiative



1,000

hours of education provided by the Nasdaq Entrepreneurial Center

18,000+

entrepreneurs served by the Nasdaq Entrepreneurial Center

80

small businesses in emerging economies supported by the Nasdaq Entrepreneurial Center

## Nasdaq Purpose

As part of Nasdaq’s Purpose, we are dedicated to creating lasting, positive change within our Company and the communities we serve. Nasdaq employees take pride in being active in our community initiatives. Through our Nasdaq GoodWorks Corporate Responsibility Program, we have committed to supporting the communities in which we live and work through various volunteer initiatives.

We provide employees with two paid days off each year to volunteer for charitable concerns or community projects. In addition, Nasdaq organizes team events and company-wide days of service to encourage everyone to take advantage of this benefit. We also match charitable donations of all Nasdaq employees and contractors up to \$1,000, or more in certain circumstances, per calendar year.

GoodWorks is Nasdaq’s signature engagement program, helping to connect employees with the causes, charities and communities that they support. The Goodworks program empowered more than 120 employee volunteers to participate in over 60 individual and team events. Nasdaq employee donors generated approximately \$1,035,500 in impact for over 640 charitable and community recipients. Additionally, Nasdaq employees volunteered more than 1,500 hours in 2022.

GRI 413 | GRI 413-1 | GRI 413-2

SDG 5

## The Nasdaq Foundation

Relaunched in 2020, the Nasdaq Foundation has deepened its commitment to advance economic progress for all by making markets work for the benefit of more people across society. The Nasdaq Foundation addresses systemic barriers faced by under-represented communities in their efforts to generate and sustain wealth. Over the past year, the Nasdaq Foundation has continued to make tremendous strides toward our mission of reimagining investor engagement and diversifying entrepreneurship, growing our network of partners through the [Quarterly Grant Program](#) and the [New Investor Initiative](#).

In 2022, the Nasdaq Foundation selected 11 partnership organizations through the Quarterly Grant Program. The services offered through these partnerships provide a wide range of support for Black, Latinx and Indigenous founders and entrepreneurs, with a strong focus on women.

The New Investor Initiative is part of the Nasdaq Foundation’s effort to fill in the next piece of our strategic initiatives: a portfolio of programs focused on tackling overlooked barriers for people of color, particularly women of color, to participate in the capital markets. In 2022, the Foundation selected three partnership organizations. These organizations are acting on different fronts of the challenge by creating a new set of role models, educational activations and conducting community-based research to create a stronger investor identity for underrepresented communities.

For more information, please see our [2022 Impact Snapshot](#) and the [Nasdaq Foundation 2022 Annual Report](#).

Nasdaq’s Chief Legal, Regulatory & Risk Officer was one of 208 general counsels that signed a letter urging Congress to increase the budget for the Legal Services Corporation, a 501(c)3 non-profit corporation established by the U.S. Congress that seeks to ensure equal access to justice under the law for all Americans.



# Nasdaq Entrepreneurial Center

The Nasdaq Entrepreneurial Center (the Center) is an independent non-profit that is building a better path for entrepreneurs worldwide. Established in 2014 with the support of the Nasdaq Foundation, the Center is improving inclusion, access and knowledge in entrepreneurship.

The Center delivers free education to more than 170 countries to meet the real time needs of entrepreneurs and translates those needs into actionable data that is shared with policy makers and academic institutions around the world to build more opportunities for all entrepreneurs. Since its inception, the Center has supported over 70,380 entrepreneurs, almost half of whom are female and more than 67% of whom are entrepreneurs of color.

In 2022, the Center served approximately 18,640 entrepreneurs, provided over 1,000 hours of education and supported small business in over 80 emerging economies.

The Nasdaq Entrepreneurial Center is committed to advancing ESG education for entrepreneurs across the world. In 2022, the Center supported 221 entrepreneurs with ESG-related education. Looking ahead

to the next five years, the Center's ongoing commitment for accessible entrepreneurial ESG education is to increase the number of entrepreneurs served with ESG education by 10%, 20% and 40% by 2023, 2025 and 2027, respectively (from a 2022 baseline of 221 entrepreneurs).

In addition, the Center is committed to providing hands-on support for founders concentrating on the UN SDGs through its Milestone Makers program, where a targeted group of entrepreneurs receive individualized business mentoring, coaching, training and resources all to help them set, hit and celebrate critical company growth milestones. In 2022, the Center had 53 participants accelerate through the Milestone Makers UN SDG-focused program. The Center's goal for 2023 and the subsequent two years, is to maintain this number. The Center intends to achieve this by prioritizing outreach and partnerships in support of social entrepreneurs and deepening its storytelling around graduates of current and past cohorts to inspire new applicants to apply to this program.

For more information visit the [Nasdaq Entrepreneurial Center website](#).



# Appendix

# ESG Data Tables

## Environmental Data

### GHG Emissions

		2022 Emissions (MT CO <sub>2</sub> e)	2021 Emissions (MT CO <sub>2</sub> e)	2020 Emissions (MT CO <sub>2</sub> e)	Annual MT Difference 2022 vs 2021	Annual % Difference 2022 vs 2021
<b>Scope 1:</b>	On-Site Combustion	52.5	0.5	2.7	52.0	NM <sup>1</sup>
	<b>Sub-Total</b>	<b>52.5</b>	<b>0.5</b>	<b>2.7</b>	<b>52.0</b>	<b>NM<sup>1</sup></b>
<b>Scope 2:</b>	Office Space (location-based)	5,843	6,001	7,027	(158)	(2.6%)
	Data Centers (location-based)	11,251	12,812 <sup>8</sup>	14,638	(1,561)	(12.2%)
	Office Space (market-based)	149	-	-	149	-
	Data Centers (market-based)	-	-	-	-	-
	<b>Sub-Total (location-based)</b>	<b>17,094</b>	<b>18,813<sup>8</sup></b>	<b>21,665</b>	<b>(1,719)</b>	<b>(9.1%)</b>
<b>Scope 3:<sup>2</sup></b>	1. Purchased Goods & Services <sup>3</sup>	59,213	68,340	38,795	(9,127)	(13.4%)
	2. Capital Goods <sup>3</sup>	6,297	3,538	10,219	2,759	78.0%
	3. Fuel- & Energy-Related Activities	2,016	1,339 <sup>9</sup>	N/A	677	50.6%
	5. Waste Generated in Operations	184	132	222	52	39.4%
	6. Business Travel <sup>4</sup>	14,325	1,636	3,493	12,689	775.6%
	7. Employee Commuting	1,319	993	2,841	326	32.8%
	8. Upstream Leased Assets <sup>6</sup>	223	859 <sup>9</sup>	N/A	(636)	(74.0%)
	13. Downstream Leased Assets <sup>7</sup>	150	169	N/A	(19)	(11.2%)
	15. Investments	2,931	1,870	N/A	1,061	56.7%
	<b>Sub-Total</b>	<b>86,658</b>	<b>78,876<sup>9</sup></b>	<b>55,570</b>	<b>7,782</b>	<b>9.9%</b>
<b>TOTAL<sup>5</sup></b>	<b>103,805</b>	<b>97,690<sup>8,9</sup></b>	<b>77,238</b>	<b>6,115</b>	<b>6.3%</b>	

Note: All the emission data was calculated in accordance with the GHG Protocol guidelines.

- 1 NM: Not Meaningful. While the percentage increase in Nasdaq's Scope 1 emissions is substantial, the gross total increase in YOY emissions remains minimal. The increase is due to methodology enhancement on moving corporate card gasoline purchases from Scope 3 to Scope 1.
- 2 Categories 4, 9, 10, 11, 12, 14 were not included, as they are not applicable to Nasdaq's business operations.
- 3 Scope 3, Category 1 and Category 2 only included tangible goods and services in 2020 and Scope 3, Category 1 and Category 2 included tangible and intangible goods and services in 2021 and 2022.
- 4 2020 Scope 3, Category 6 travel data is limited to data provided by third party travel vendors. The data gathering process for 2021 and 2022 improved and includes data provided by third party travel vendors and by corporate card spend.
- 5 The total for all scopes integrates location-based Scope 2 emissions, not market-based Scope 2 emissions.
- 6 Upstream leased assets include emissions from operation of assets leased by the company and not included in Scope 1 and 2.
- 7 Downstream leased assets include emissions from operations of assets leased to other entities.
- 8 Our 2021 Scope 2 location-based emissions were recalculated from our prior reported 2021 Scope 2 emissions. For our 2022 and recalculated 2021 Scope 2 location-based emissions, we implemented a new, updated emissions methodology using location-specific emission factors for each of our U.S. locations, rather than a U.S. average emission factor.
- 9 2021 GHG emissions were recalculated to add Category 3 and Category 8 in order to align to our SBTi-approved base year.

### Emissions Intensity

The table below shows the emissions per full time employee and per each million of U.S. dollars of revenue.

		2022			2021			2020		
Net Revenue (in \$ million)		\$3,582			\$3,420			\$2,903		
Employee Headcount		6,377			5,814			4,830		
		Emissions (MT CO <sub>2</sub> e)	Emissions per Employee (MT CO <sub>2</sub> e)	Emissions per \$ Million Revenue (MT CO <sub>2</sub> e)	Emissions (MT CO <sub>2</sub> e)	Emissions per Employee (MT CO <sub>2</sub> e)	Emissions per \$ Million Revenue (MT CO <sub>2</sub> e)	Emissions (MT CO <sub>2</sub> e)	Emissions per Employee (MT CO <sub>2</sub> e)	Emissions per \$ Million Revenue (MT CO <sub>2</sub> e)
Scope 1:	On-Site Combustion	52.5	0.01	0.01	0.5	-	-	2.7	-	-
	<b>Sub-Total</b>	<b>52.5</b>	<b>0.01</b>	<b>0.01</b>	<b>0.5</b>	<b>-</b>	<b>-</b>	<b>2.7</b>	<b>-</b>	<b>-</b>
Scope 2:	Location-based	17,094	2.68	4.77	18,813 <sup>1</sup>	3.24	5.50	21,665	4.49	7.46
	<b>Sub-Total</b>	<b>17,094</b>	<b>2.68</b>	<b>4.77</b>	<b>18,813<sup>1</sup></b>	<b>3.24</b>	<b>5.50</b>	<b>21,665</b>	<b>4.49</b>	<b>7.46</b>
Scope 3:	1. Purchased Goods & Services	59,213	9.29	16.53	68,340	11.75	19.98	38,795	8.03	13.38
	2. Capital Goods	6,297	0.99	1.76	3,538	0.61	1.03	10,219	2.12	3.52
	3. Fuel & Energy Related Activities	2,016	0.32	0.56	1,339 <sup>2</sup>	0.23	0.39	-	-	-
	5. Waste	184	0.03	0.05	132	0.02	0.04	222	0.05	0.08
	6. Business Travel	14,325	2.25	4.00	1,636	0.28	0.48	3,493	0.72	1.20
	7. Employee Commute	1,319	0.21	0.37	993	0.17	0.29	2,841	0.59	0.98
	8. Upstream Leased Assets	223	0.03	0.06	859 <sup>2</sup>	0.15	0.25	-	-	-
	13. Downstream Leased Assets	150	0.02	0.04	169	0.03	0.05	-	-	-
	15. Investments	2,931	0.46	0.82	1,870	0.32	0.55	-	-	-
	<b>Sub-Total</b>	<b>86,658</b>	<b>13.59</b>	<b>24.19</b>	<b>78,876<sup>2</sup></b>	<b>13.57</b>	<b>23.06</b>	<b>55,570</b>	<b>11.51</b>	<b>19.14</b>
<b>TOTAL (Location-Based)</b>		<b>103,805</b>	<b>16.28</b>	<b>28.97</b>	<b>97,690<sup>1,2</sup></b>	<b>16.80</b>	<b>28.56</b>	<b>77,238</b>	<b>15.99</b>	<b>26.61</b>

Note: Scope 3, Category 1 & Category 2 included tangible and intangible goods and services in 2021. Scope 3, Category 1 & Category 2 only included tangible goods and services in 2020.

1 Our 2021 Scope 2 location-based emissions were recalculated from our prior reported 2021 Scope 2 emissions. For our 2022 and recalculated 2021 Scope 2 location-based emissions, we implemented a new, updated emissions methodology using location-specific emission factors for each of our U.S. locations, rather than a U.S. average emission factor.

2 2021 GHG emissions were recalculated to add Category 3 and Category 8 in order to align to our SBTi-approved base year.

### Energy Consumption

Nasdaq's energy consumption has decreased due to our optimized leasing strategy and improved data quality.

The table below breaks down energy consumption within Nasdaq.

Energy Consumption Within Nasdaq (MWh)	2022	2021	2020
Total Energy Consumption	64,882	75,143	62,364
Non-Renewable Fuel Consumed <sup>1</sup>	1,173	1,694	1,242
Natural Gas <sup>1</sup>	1,163	1,676	1,229
Diesel/gasoline <sup>1</sup>	10	17	13
Total Electricity and Steam Consumption	64,868	70,787	59,900
Electricity Consumption	64,200	70,787	59,900
Steam and Heat Consumption <sup>2</sup>	668	-	-
Total Renewable Electricity Consumption	64,200	70,787	59,900
Pre-negotiated renewable Energy & vPPAs	54,104	60,777	49,272
Renewable Energy Certificates (RECs)	10,096	10,010	10,628
% of Renewable Electricity	100%	100%	100%

<sup>1</sup> Includes both direct and indirect fuels consumed.

<sup>2</sup> Steam and heating data not available in 2021 and 2020.

The table below shows a breakdown by region of the Company's total energy use across Scope 1 and Scope 2 categories.

MWh	2022			2021			2020		
	Scope 1	Scope 2	Total	Scope 1	Scope 2	Total	Scope 1	Scope 2	Total
Americas	11	48,041	48,052	0.1	52,034	52,034	0.3	42,170	42,170
APAC	3	2,702	2,705	-	2,754	2,754	-	2,926	2,926
EMEA	-	14,125	14,125	-	20,355	20,355	-	17,268	17,268
<b>Total</b>	<b>14</b>	<b>64,868</b>	<b>64,882</b>	<b>0.1</b>	<b>75,143</b>	<b>75,143</b>	<b>0.3</b>	<b>62,364</b>	<b>62,364</b>

The table below breaks down the 2022 Scope 2 total energy consumption by country.

Nasdaq purchases a significant portion of its Scope 2 electricity from pre-negotiated renewable sources and the remaining is procured using Renewable Energy Certificates (RECs) resulting in net-zero, market-based Scope 2 emissions for our electricity. This aligns to our science-based targets goals to procure 100% renewable electricity annually.

Country	Total Energy Consumption MWh/Year	Total Electricity Consumption MWh/Year	Renewable Electricity MWh/Year	% Renewable Electricity	Total Scope 2 Location Based Emissions (MT CO <sub>2</sub> e)	Total Scope 2 Market Based Emissions (MT CO <sub>2</sub> e)
Australia	1,463	1,463	1,463	100%	950	-
Belgium	1	1	1	100%	-	-
Canada	3,778	3,600	3,600	100%	492	54
China	4	4	4	100%	2	-
Denmark	351	160	160	100%	51	33
Estonia	118	118	118	100%	71	-
Finland	167	167	167	100%	12	-
France	95	95	95	100%	5	-
Germany	332	332	332	100%	118	-
Hong Kong	144	144	144	100%	92	-
Iceland	108	108	108	100%	-	-
India	698	698	698	100%	483	-
Italy	17	17	17	100%	5	-
Japan	47	47	47	100%	22	-
Latvia	114	114	114	100%	12	-
Lithuania	509	398	398	100%	73	19
Netherlands	350	350	350	100%	110	-
Norway	154	154	154	100%	1	-
Philippines	215	215	215	100%	152	-
Singapore	128	128	128	100%	50	-



Country	Total Energy Consumption MWh/Year	Total Electricity Consumption MWh/Year	Renewable Electricity MWh/Year	% Renewable Electricity	Total Scope 2 Location Based Emissions (MT CO <sub>2</sub> e)	Total Scope 2 Market Based Emissions (MT CO <sub>2</sub> e)
Spain	7	7	7	100%	1	-
S. Korea	3	3	3	100%	1	-
Sweden	10,310	10,310	10,310	100%	148	-
UK	1,489	1,489	1,489	100%	328	-
Ukraine	3	3	3	100%	1	-
USA	44,263	44,075	44,075	100%	13,914	43
<b>Total</b>	<b>64,868</b>	<b>64,200</b>	<b>64,200</b>	<b>100%</b>	<b>17,094</b>	<b>149</b>

The table below breaks down the Company's total energy use across Scope 1 and Scope 2 categories by country.

MWh	2022			2021			2020		
	Scope 1	Scope 2	Total	Scope 1	Scope 2	Total	Scope 1	Scope 2	Total
Australia	-	1,463	1,463	-	1,621	1,621	-	1,573	1,573
Belgium	-	1	1	-	17	17	-	17	17
Canada	-	3,778	3,778	-	3,218	3,218	-	1,763	1,763
China	-	4	4	-	16	16	-	12	12
Denmark	-	351	351	-	146	146	-	114	114
Estonia	-	118	118	-	118	118	-	24	24
Finland	-	167	167	-	193	193	-	161	161
France	-	95	95	-	20	20	-	16	16
Germany	-	332	332	-	412	412	-	556	556
Hong Kong	-	144	144	-	174	174	-	174	174
Iceland	-	108	108	-	103	103	-	103	103
India	3	698	701	-	552	552	-	652	652
Italy	-	17	17	-	15	15	-	3	3

MWh	2022			2021			2020		
	Scope 1	Scope 2	Total	Scope 1	Scope 2	Total	Scope 1	Scope 2	Total
Japan	-	47	47	-	37	37	-	30	30
Latvia	-	114	114	-	77	77	-	43	43
Lithuania	-	509	509	-	357	357	-	426	426
Netherlands	-	350	350	-	459	459	-	719	719
Norway	-	154	154	-	127	127	-	113	113
Philippines	-	215	215	-	165	165	-	290	290
Singapore	-	128	128	-	186	186	-	192	192
Spain	-	7	7	-	8	8	-	1	1
S. Korea	-	3	3	-	3	3	-	3	3
Sweden	-	10,310	10,310	-	15,959	15,959	-	12,654	12,654
UK	-	1,489	1,489	-	2,332	2,332	-	2,306	2,306
Ukraine	-	3	3	-	12	12	-	12	12
USA	11	44,263	44,274	0.1	48,816	48,816	0.3	40,407	40,407
<b>Total</b>	<b>14.0</b>	<b>64,868</b>	<b>64,882</b>	<b>0.1</b>	<b>75,143</b>	<b>75,143</b>	<b>0.3</b>	<b>62,364</b>	<b>62,364</b>

## Waste

The tables below represent the disposal and treatment of waste generated in Nasdaq's global operations.

Region	2022 Waste and Recycling (Weight in MT)			2022 Waste and Recycling Emissions (MT CO <sub>2</sub> e)			2021 Waste and Recycling (Weight in MT)		2021 Waste and Recycling Emissions (MT CO <sub>2</sub> e)		2020 Waste and Recycling (Weight in MT)		2020 Waste and Recycling Emissions (MT CO <sub>2</sub> e)	
	Incinerated	Landfilled	Recycled/Composted	Incinerated	Landfilled	Recycled/Composted	Landfilled	Recycled/Composted	Landfilled	Recycled/Composted	Landfilled	Recycled/Composted	Landfilled	Recycled/Composted
Americas	48	114	108	21	59	9	179	90	29	12	47	74	14	2
APAC	-	10	8	-	6	1	78	31	13	5	48	38	14	1
EMEA	1	71	106	-	37	8	23	22	4	5	37	67	11	1
<b>Total</b>	<b>49</b>	<b>195</b>	<b>222</b>	<b>21</b>	<b>102</b>	<b>18</b>	<b>280</b>	<b>143</b>	<b>46</b>	<b>22</b>	<b>132</b>	<b>179</b>	<b>39</b>	<b>4</b>

Note: Nasdaq has implemented a program to periodically audit the waste of our key offices. Whenever possible, Nasdaq's actual waste was included in the calculation; otherwise, a proportional share was determined using occupied square footage. If waste data was completely unavailable, estimates were based on an average per square foot for waste from collected from our waste audits.

Nasdaq's 2022 waste was affected by our offices reopening, an increase in employee count and our acquisition of Verafin. In 2022, we began quantifying the waste that was incinerated instead of just listed as landfill.

## Water

Water consumption data represented in the tables below was obtained directly from utility providers and/or from landlords or datacenter operators.

Region	2022 Water Consumption <sup>1,2</sup> Water (Kiloliters)	2022 Water Emissions Emissions (MT CO <sub>2</sub> e)	2021 Water Consumption <sup>1,2</sup> Water (Kiloliters)	2021 Water Emissions Emissions (MT CO <sub>2</sub> e)	2020 Water Consumption <sup>1,2</sup> Water (Kiloliters)	2020 Water Emissions Emissions (MT CO <sub>2</sub> e)
Americas	20,857	23	27,967	34	83,260	20
APAC	4,213	4	4,728	6	9,832	2
EMEA	14,105	16	19,046	23	30,178	7
<b>Total</b>	<b>39,175</b>	<b>43</b>	<b>51,741</b>	<b>63</b>	<b>123,270</b>	<b>29</b>

1 For Nasdaq office space water consumption, where the only data available was aggregated for the entire building, the Nasdaq portion of the water was calculated based on the percentage of Nasdaq occupied space within the building. Where no water consumption data at all could be obtained for a Nasdaq office location, data was calculated using assumptions based on the number of employees, the square footage of the office, the infrastructure within the building and the green certification for the building (if applicable).

2 For Nasdaq datacenter water consumption, where only data aggregated from the operator was available, the Nasdaq portion of the water was calculated based on the percentage of racks within the datacenter occupied by Nasdaq. Where no water consumption data could be obtained for a Nasdaq datacenter location, data was calculated using assumptions based on the number of racks occupied by Nasdaq, the infrastructure within the building and the green certification for the building (if applicable).

Nasdaq's water consumption has decreased in 2022 partially due to better data quality and recording techniques.

# Social Data

Unless otherwise indicated, social data tables exclude employees of non-wholly owned consolidated subsidiaries.

## Global Workforce by Gender

Global Workforce by Employee Type	2022	2021 <sup>1</sup>	2020
Full-time male employees	4,019	3,202	3,116
Full-time female employees	2,258	1,775	1,652
Full-time undisclosed employees	16	3	11
Full-time non-binary employees	2	1	-
Total number of full-time employees	6,295	4,981	4,779
Part-time male employees	33	25	20
Part-time female employees	33	32	31
Total number of part-time employees	66	57	51
Employees of non-wholly owned consolidated subsidiaries	16	NR	-
<b>Total employees</b>	<b>6,377</b>	<b>5,038</b>	<b>4,830</b>

Note: Data on this page uses the traditional gender categories of male and female as required in our reports to the U.S. government. Nasdaq's reporting in this manner does not represent our position on the issue and we deeply respect that gender is not binary.

<sup>1</sup> Excludes Verafin employees (acquired in February 2021).

NR: Not Reported

Number of Employees by Employment Type	2022 <sup>1</sup>	2021 <sup>2</sup>	2020 <sup>2</sup>
Permanent contract – male employees	4,052	3,227	3,136
Permanent contract – female employees	2,291	1,807	1,683
Permanent contract – undisclosed employees	16	3	11
Permanent contract – non-binary employees	2	1	-
<b>Total permanent contract employees</b>	<b>6,361</b>	<b>5,038</b>	<b>4,830</b>
Fixed-term or temporary contract – male employees <sup>3</sup>	14	13	81
Fixed-term or temporary contract – female employees <sup>3</sup>	12	12	49
<b>Total fixed-term or temporary contract employees</b>	<b>26</b>	<b>25</b>	<b>130</b>

1 Includes Verafin employees.

2 Excludes Verafin employees.

3 Fixed term or temporary contract employees are employed for a limited period of time.

Regional Breakdown of Workforce <sup>1</sup>	2022	2021	2020
Americas – male	2,251	2,037	1,459
Americas – female	1,260	1,094	776
<b>Total number of Americas employees</b>	<b>3,520</b>	<b>3,131</b>	<b>2,235</b>
EMEA – male	1,134	1,133	1,129
EMEA – female	613	596	573
<b>Total number of EMEA employees</b>	<b>1,751</b>	<b>1,729</b>	<b>1,702</b>
Asia – male	667	583	548
Asia – female	418	365	334
<b>Total number of Asia employees</b>	<b>1,090</b>	<b>948</b>	<b>882</b>
<b>Total number of undisclosed employees</b>	<b>16</b>	<b>5</b>	<b>11</b>
<b>Total number of non-binary employees</b>	<b>2</b>	<b>1</b>	<b>-</b>

1 Includes Verafin employees.

**Gender by Level**

Career Level <sup>1</sup>	2022				2021				2020		
	Female	Male	Undisclosed	Non Binary	Female	Male	Undisclosed	Non Binary	Female	Male	Undisclosed
Executive	23.7%	76.3%	-	-	24.2%	75.8%	-	-	23.8%	75.7%	0.5%
Senior	30.8%	69.3%	0.4%	-	30.3%	69.4%	0.3%	-	29.4%	70.4%	0.2%
Mid	36.7%	63.3%	0.3%	-	35.2%	64.7%	-	0.1%	32.9%	67.0%	0.1%
Entry	40.8%	59.2%	0.4%	0.1%	40.6%	59.3%	0.1%	-	42.4%	57.1%	0.5%

Note: Totals may not add up to 100% due to rounding to the closest tenth decimal point.

<sup>1</sup> Calculations exclude employees of Verafin and Metro.

**Gender at the Managerial Level (U.S. Only)**

Manager is defined by a Nasdaq regular employee with at least one direct report.

	2022				2021				2020		
	Female	Male	Undisclosed	Non-binary	Female	Male	Undisclosed	Non-binary	Female	Male	Undisclosed
Managerial	38.9%	61.1%	-	-	35.6%	64.4%	-	-	31.4%	68.5%	0.1%

	2022		2021	
	Female	Male	Female	Male
Management-level employees in revenue generating functions <sup>1</sup>	49.7%	50.3%	39.1%	60.9%

<sup>1</sup> Calculations exclude employees of Verafin and Metro.

	2022		2021	
	Female	Male	Female	Male
Management-level employees in STEM related fields <sup>1</sup>	15.0%	85.0%	18.0%	82.0%

<sup>1</sup> Calculations exclude employees of Verafin and Metro.

**Workforce by Race and Ethnicity**

**Seniority by Race and Ethnicity (U.S. Only)**

Race & Ethnicity <sup>1</sup>	2022				2021				2020			
	Executive	Senior	Mid	Entry	Executive	Senior	Mid	Entry	Executive	Senior	Mid	Entry
White	84.6%	71.8%	64.0%	57.6%	85.9%	71.0%	65.3%	57.7%	88.9%	72.8%	66.3%	57.6%
Asian	6.0%	15.3%	17.9%	16.4%	5.2%	14.4%	18.1%	18.6%	5.2%	14.9%	17.6%	19.0%
Black	4.0%	4.7%	7.1%	12.2%	3.0%	4.6%	6.8%	11.1%	2.2%	3.7%	6.7%	11.6%
Hispanic	2.7%	4.5%	5.9%	7.2%	3.7%	4.9%	5.8%	6.2%	1.5%	4.0%	5.4%	5.3%
Two or More	0.7%	1.3%	2.2%	3.0%	0.7%	2.0%	1.6%	3.3%	0.7%	2.2%	1.5%	3.4%
Pacific Islander	0.7%	-	0.3%	0.3%	0.7%	-	0.3%	-	0.7%	-	0.3%	-
Native American	-	0.5%	-	0.2%	-	0.3%	0.2%	0.2%	-	-	0.1%	0.2%
Undisclosed	1.3%	1.8%	2.7%	3.2%	0.7%	2.9%	1.9%	2.9%	0.7%	2.5%	2.1%	3.0%

Note: Totals may not add up to 100% due to rounding to the closest tenth decimal point.

1 Calculations exclude employees of Verafin and Metrio.

**Race and Ethnicity at the Managerial Level (U.S. Only)**

Race & Ethnicity	2022	2021	2020
White	73.7%	76.4%	76.2%
Asian	10.7%	9.9%	9.4%
Black	6.2%	5.1%	3.9%
Hispanic	4.1%	4.4%	3.6%
Two or More	2.6%	2.0%	1.9%
Pacific Islander	0.2%	0.2%	-
Native American	0.3%	0.2%	-
Undisclosed	2.3%	1.8%	5.1%

Note: Totals may not add up to 100% due to rounding to the closest tenth decimal point.

GRI 405-1  
 SASB TC-SI-330a.3  
 WEF Core 11

### Gender by Age

The tables below represent our global workforce by age and U.S. workforce by age and race and ethnicity.

	2022			2021			2020		
	Under 30 Years	30-50 Years	Over 50 Years	Under 30 Years	30-50 Years	Over 50	Under 30 Years	30-50 Years	Over 50 Years
Male	21.5%	62.4%	16.1%	19.2%	62.9%	17.9%	22.2%	60.5%	17.3%
Female	26.0%	60.9%	13.1%	25.9%	59.7%	14.4%	29.9%	55.9%	14.2%
Undisclosed	50.0%	43.8%	6.3%	33.3%	33.3%	33.3%	NR	NR	NR
Non-Binary	-	100.0%	-	-	100.0%	-	NR	NR	NR

Note: Totals may not add up to 100% due to rounding to the closest tenth decimal point.

NR: Not Reported

### Race and Ethnicity by Age (U.S. Only)

Race & Ethnicity	Under 30 Years	30-50 Years	Over 50 Years
White	62.5%	62.8%	71.4%
Asian	15.9%	17.4%	12.7%
Black	6.9%	8.2%	8.5%
Hispanic	8.7%	4.9%	4.6%
Two or More	3.2%	3.0%	1.6%
Pacific Islander	0.4%	0.2%	0.4%
Native American	-	0.2%	-
Not disclosed	2.5%	3.2%	0.8%

Note: Totals may not add up to 100% due to rounding to the closest tenth decimal point.



**Employee Turnover**

Overall Employee Turnover Rates	2022 <sup>1</sup>	2021	2020
Voluntary	11.0%	11.5%	7.0%
Involuntary	2.2%	6.1%	5.5%

<sup>1</sup> Calculations exclude 907 Verafin employees due to internal timing of data integration.

Employee Voluntary and Involuntary Turnover Rates by Gender	2022 <sup>1</sup>	2021
Male	13.1%	14.5%
Female	13.2%	14.8%
Undisclosed	8.3%	38.5%
Non-binary	-	-

<sup>1</sup> Calculations exclude 907 Verafin employees due to internal timing of data integration.

Employee Voluntary and Involuntary Turnover Rates by Employee Level	2022 <sup>1</sup>	2021
Executive	7.6%	11.8%
Senior	6.3%	10.3%
Mid	12.4%	12.9%
Entry	20.1%	23.2%

<sup>1</sup> Calculations exclude 907 Verafin employees due to internal timing of data integration.

Employee Voluntary and Involuntary Turnover Rates by Race & Ethnicity (U.S. Only)	2022	2021
White	12.5%	14.3%
Asian	13.9%	14.1%
Black	12.1%	21.7%
Hispanic	14.8%	17.7%
Two or More	12.8%	22.2%
Pacific Islander	-	20.0%
Native American	-	50.0%
Undisclosed	9.1%	30.6%

**New and Internal Hires**

	2022	2021
Percentage of open positions filled by internal hires <sup>1</sup>	21.3%	16.1%

<sup>1</sup> Calculations exclude Verafin employees.

<b>New and Internal Hires by Age<sup>1</sup></b>	2022	2021
Under 30 years	51.9%	50.2%
30-50 years	44.6%	43.7%
Over 50 years	3.5%	6.1%

<sup>1</sup> Calculations exclude Verafin employees.

<b>New and Internal Hires by Gender<sup>1</sup></b>	2022	2021
Male	58.9%	58.4%
Female	40.6%	41.5%
Undisclosed	0.5%	0.1%
Non-binary	-	NR

NR: Not Reported

<sup>1</sup> Calculations exclude Verafin employees.

<b>New and Internal Hires by Level<sup>1</sup></b>	2022	2021
Executive	1.2%	1.2%
Senior	4.7%	6.0%
Mid	47.2%	46.2%
Entry	46.9%	45.6%

<sup>1</sup> Calculations exclude Verafin employees.

<b>New and Internal Hires by Race &amp; Ethnicity (U.S. Only)<sup>1</sup></b>	2022	2021
White	62.8%	57.5%
Asian	15.0%	16.2%
Black	8.8%	9.9%
Hispanic	7.6%	8.8%
Two or More	2.9%	3.1%
Pacific Islander	0.2%	0.2%
Native American	-	0.2%
Undisclosed	2.7%	4.2%

<sup>1</sup> Calculations exclude Verafin employees.

**Parental Leave (U.S. Only)**

	2022	2021	2020
Female employees who were entitled to paid parental leave	881	785	746
Male employees who were entitled to paid parental leave	1,433	1,378	1,362
Undisclosed and non-binary employees who were entitled to paid parental leave	8	2	2
Female employees who took paid parental leave	43	35	26
Male employees who took paid parental leave	50	47	30
Female employees who returned to work after paid parental leave ended	43	32	26
Male employees who returned to work after paid parental leave ended	50	45	30
Female employees who returned to work after paid parental leave ended who were still employed 12 months after their return to work	42	29	26
Male employees who returned to work after paid parental leave ended who were still employed 12 months after their return to work	48	40	29
Return to work and retention rates of female employees who returned to work after leave	98%	83%	100%
Return to work and retention rates of male employees who returned to work after leave	96%	85%	97%

# Governance Data

## Tax Transparency

	# of Employees	Revenue from Third-Party Sales (in Millions)	Profit/Loss Before Tax (in Millions)	Corporate Income Tax Paid on a Cash Basis, Net of Refund (in Millions)
Australia	276	125	43	13
Belgium	3	-	-	-
Canada	1,205	241	(49)	(2)
Denmark	42	51	41	8
Estonia	20	6	2	-
Finland	57	43	27	7
France	6	-	-	-
Germany	9	-	-	-
Hong Kong	51	-	1	-
Iceland	20	12	6	1
India	431	-	4	1
Italy	6	-	-	-
Japan	14	-	-	-
S. Korea	4	1	-	-
Latvia	19	3	-	-
Lithuania	421	4	4	-
Luxembourg	-	-	3	1
Netherlands	8	-	1	-
Norway	28	19	2	2
Philippines	290	-	-	-
Saudi Arabia	-	-	-	-
Singapore	23	7	-	-
Spain	-	-	-	-
Sweden	903	425	160	43
Turkey	1	-	-	-
United Kingdom	199	63	15	1
Ukraine	20	-	-	-
United Arab Emirates	-	-	-	-
United States	2,321	5,226	1,215	199
<b>TOTAL</b>	<b>6,377</b>	<b>6,226</b>	<b>1,475</b>	<b>274</b>

## Our Support of the United Nations Sustainable Development Goals (SDGs)

SDG	Associated SDG Targets	Nasdaq's SDG-Aligned Initiatives
<b>5   Gender Equality:</b> Achieve gender equality and empower all women and girls	5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life	<a href="#">Diversity, Equity, &amp; Inclusion</a> <a href="#">The Nasdaq Foundation</a> <a href="#">Board Diversity Support</a>
<b>8   Decent Work and Economic Growth:</b> Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	8.3: Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formation and growth of micro-, small- and medium-sized enterprises, including through access to financial services	<a href="#">Capital Access Platforms: Listings (U.S. &amp; Nordics)</a> <a href="#">Nasdaq Entrepreneurial Center</a>
<b>9   Industry, Innovation, and Infrastructure:</b> Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation	9.3: Increase the access of small-scale industrial and other enterprises, in particular in developing countries, to financial services, including affordable credit, and their integration into value chains and markets  9.a: Facilitate sustainable and resilient infrastructure development in developing countries through enhanced financial, technological and technical support to African countries, least developed countries, landlocked developing countries and small island developing States	<a href="#">Market Platforms: Marketplace Technology   European &amp; North American Trading Services</a>
<b>10   Reduced Inequalities:</b> Reduce inequality within and among countries	10.2: By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status  10.5: Improve the regulation and monitoring of global financial markets and institutions and strengthen the implementation of such regulation	<a href="#">Diversity, Equity, &amp; Inclusion</a> <a href="#">Supplier Diversity</a> <a href="#">Nasdaq Entrepreneurial Center</a> <a href="#">eVestment Diversity &amp; Inclusion and ESG Data</a> <a href="#">Anti-Financial Crime</a>
<b>12   Responsible Consumption and Production:</b> Ensure sustainable consumption and production patterns	12.6: Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle	<a href="#">Capital Access Platforms: Corporate ESG Solutions</a>
<b>13   Climate Action:</b> Take urgent action to combat climate change and its impacts	13.2: Integrate climate change measures into national policies, strategies and planning  13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning	<a href="#">Decarbonization &amp; Climate Change Strategy</a> <a href="#">Evaluating &amp; Engaging Our Supply Chain</a> <a href="#">Market Platforms: European Trading Services</a> <a href="#">Capital Access Platforms: Investment Intelligence</a>
<b>17   Partnerships for the Goals:</b> Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development	17.16: Enhance the Global Partnership for Sustainable Development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the Sustainable Development Goals in all countries, in particular developing countries	<a href="#">ESG Memberships</a>

# Assurance Statements

## Independent Limited Assurance Statement on Nasdaq's GHG Emissions, Energy Consumption and Employee Data

LRQA verified Nasdaq's 2022 greenhouse gas emissions (including Scope 1, Scope 2 and all applicable upstream and downstream Scope 3 emissions) energy consumption, and social data (related to employee workforce, turnover and hires) to a limited level of assurance. More details on the scope, standards and LRQA's conclusion can be found in the assurance statement on right and available for download on our [ESG Resource Center](#).



### LRQA Independent Assurance Statement Relating to Nasdaq's GHG Emissions and Social Metrics for the CY2022

This Assurance Statement has been prepared for Nasdaq, Inc. (Nasdaq) in accordance with our contract.

#### Terms of Engagement

LRQA was commissioned by Nasdaq to provide independent assurance of its greenhouse gas (GHG) emissions inventory and social metrics for the Calendar Year (CY) 2022, and restatement of Base Year CY 2021 ("the Inventory") against the assurance criteria below to a limited level of assurance and materiality of 5% using LRQA's verification procedure based on ISO 14064 - Part 3 for greenhouse gas emissions. LRQA's verification procedure is based on current best practice and is in accordance with ISAE 3000 and ISAE 3410.

Our assurance engagement covered all activities under Nasdaq's operational control in its global operations and specifically the following requirements:

- Verifying conformance with:
  - Nasdaq's reporting methodologies for the selected datasets; and
  - World Resources Institute / World Business Council for Sustainable Development Greenhouse Gas Protocol: A corporate accounting and reporting standard, revised edition (otherwise referred to as the WRI/WBCSD GHG Protocol) for the GHG data<sup>1</sup>.
- Evaluating the accuracy and reliability of data and information for only the selected indicators listed below:
  - Direct (Scope 1), Energy Indirect (Scope 2) and Other Indirect (Scope 3) GHG emissions;
    - Scope 3 GHG emissions verified by LRQA consist of Category 1 Purchased Goods & Services, Category 2 Capital Goods, Category 3 Fuel and Energy Related Activities, Category 5 Waste Generated in Operations, Category 6 Business Travel, Category 7 Employee Commuting, Category 8 Upstream Leased Assets, Category 13 Downstream Leased Assets, and Category 15 Investments;
    - Energy Consumed;
    - Social Metrics Cys 2021 & 2022; and
    - Base Year CY 2021 Restatement.

Aside from the Scope 3 emissions categories listed above, our assurance engagement excluded the data and information of Nasdaq's suppliers, contractors and any third-parties mentioned in the Inventory.

LRQA's responsibility is only to Nasdaq. LRQA disclaims any liability or responsibility to others as explained in the end footnote. Nasdaq's responsibility is for collecting, aggregating, analysing and presenting all the data and information within the Inventory and for maintaining effective internal controls over the systems from which the Inventory is derived. Ultimately, the Inventory has been approved by, and remains the responsibility of Nasdaq.

#### LRQA's Opinion

Based on LRQA's approach, except for the effect of the matters described in the Basis for Qualified Opinion, nothing has come to our attention that would cause us to believe that Nasdaq has not, in all material respects:

- Met the requirements of the criteria listed above; and
- Disclosed accurate and reliable performance data and information as summarized in Tables 1-3 below.

The opinion expressed is formed on the basis of a limited level of assurance<sup>2</sup> and at the materiality of 5%.

<sup>1</sup> <http://www.ghgprotocol.org/>

<sup>2</sup> The extent of evidence-gathering for a limited assurance engagement is less than for a reasonable assurance engagement. Limited assurance engagements focus on aggregated data rather than physically checking source data at sites. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.



#### Basis for Qualified Opinion

- Nasdaq has not calculated business travel emissions consistently from its data streams. This non-conformance is not material.

**Table 1. Summary of Nasdaq's Key GHG Emissions Data for CY 2022:**

Metric	Quantity	Unit
Scope 1 GHG emissions	53	Tonnes CO <sub>2</sub> e
Scope 2 GHG emissions (Location-based) <sup>1</sup>	17,094	Tonnes CO <sub>2</sub> e
Scope 2 GHG emissions (Market-based) <sup>1</sup>	149	Tonnes CO <sub>2</sub> e
Scope 3 Category 1 Purchased Goods & Services	59,213	Tonnes CO <sub>2</sub> e
Scope 3 Category 2 Capital Goods	6,297	Tonnes CO <sub>2</sub> e
Scope 3 Category 3 Fuel and Energy Related Activities	2,016	Tonnes CO <sub>2</sub> e
Scope 3 Category 5 Waste Generated in Operations	184	Tonnes CO <sub>2</sub> e
Scope 3 Category 6 Business Travel	14,325	Tonnes CO <sub>2</sub> e
Scope 3 Category 7 Employee Commuting	1,319	Tonnes CO <sub>2</sub> e
Scope 3 Category 8 Upstream Leased Assets	223	Tonnes CO <sub>2</sub> e
Scope 3 Category 13 Downstream Leased Assets	150	Tonnes CO <sub>2</sub> e
Scope 3 Category 15 Investments	2,931	Tonnes CO <sub>2</sub> e
Energy Consumed	64,882	MWh

Note 1: Scope 2, Location-based and Scope 2, Market-based are defined in the WRI/WBCSD GHG Protocol Scope 2 Guidance, 2015

**Table 2. Summary of Nasdaq's Restated Data for Base Year CY 2021:**

Metric	Quantity	Unit
Scope 1 GHG emissions	0.49	Tonnes CO <sub>2</sub> e
Scope 2 GHG emissions (Location-based) <sup>1</sup>	18,813	Tonnes CO <sub>2</sub> e
Scope 2 GHG emissions (Market-based) <sup>1</sup>	0	Tonnes CO <sub>2</sub> e

Note 1: Scope 2, Location-based and Scope 2, Market-based are defined in the WRI/WBCSD GHG Protocol Scope 2 Guidance, 2015

**Table 3. List of Nasdaq's Social Metrics<sup>1</sup> Verified by LRQA for Cys 2021 & 2022:**

Metric
Global Workforce by Gender
Regional Breakdown of Workforce by Gender
Workforce Gender by Level
Workforce Gender by Age
Workforce Gender at the Managerial Level
Workforce by Race and Ethnicity (U.S. Only)
Workforce by Race and Ethnicity at the Managerial Level (U.S. Only)



Workforce Seniority by Race and Ethnicity (U.S. Only)
Workforce by Race and Ethnicity by Age (U.S. Only)
Employee Turnover (Overall; by Gender; by Level, by Race and Ethnicity (U.S. Only))
New and Internal Hires (Overall; by Age; by Gender; by Level, by Race and Ethnicity (U.S. Only))
Global Workforce by Gender

Note 1: LRQA verified data and information provided in file *Social Data.docx* and *Workday Report.xlsx* received March 13, 2023

#### LRQA's Approach

LRQA's assurance engagements are carried out in accordance with our verification procedure. The following tasks were undertaken as part of the evidence gathering process for this assurance engagement:

- interviewing relevant employees of the organization responsible for managing GHG emissions, energy and social data and records;
- assessing Nasdaq's GHG, energy and social data management systems to confirm they are designed to prevent significant errors, omissions or mis-statements in the Inventory;
- verifying historical GHG emissions, energy and social data and records at an aggregated level for the calendar year 2022; and
- confirming Nasdaq's adherence to its Base Year Recalculation Policy.

#### LRQA's Standards, Competence and Independence

LRQA implements and maintains a comprehensive management system that meets accreditation requirements for ISO 14065: *Greenhouse gases - Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition* and ISO/IEC 17021: *Conformity assessment - Requirements for bodies providing audit and certification of management systems* that are at least as demanding as the requirements of the International Standard on Quality Control 1 and comply with the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants.

LRQA ensures the selection of appropriately qualified individuals based on their qualifications, training and experience. The outcome of all verification and certification assessments is then internally reviewed by senior management to ensure that the approach applied is rigorous and transparent.

Signed

Date: 26 May 2023

*Kate Pagan*

Kate Pagan  
LRQA Lead Verifier  
On behalf of LRQA, Inc.  
2101 CityWest Blvd, Houston, TX 77042

LRQA reference: UQA00002005/6001952

LRQA Group, its affiliates and subsidiaries, and their respective officers, employees or agents are, individually and collectively, referred to in this clause as "LRQA". LRQA assumes no responsibility and shall not be liable to any person for any loss, damage or expense caused by reliance on the information or advice in this document or however provided, unless that person has signed a contract with the relevant LRQA entity for the provision of this information or advice and in that case any responsibility or liability is exclusively on the terms and conditions set out in that contract. The English version of this Assurance Statement is the only valid version. LRQA assumes no responsibility for versions translated into other languages. This Assurance Statement is only valid when published with the inventory to which it refers. It may only be reproduced in its entirety. Copyright © LRQA, 2023.

### Independent Reasonable Assurance Statement on Nasdaq's Supplier Data

LRQA verified Nasdaq's 2022 U.S. addressable spend from U.S. based, diverse-owned suppliers and suppliers by spend covering purchased goods and services and capital goods that have SBTi targets to a reasonable level of assurance. Details on the scope, standards and LRQA's conclusion can be found in the assurance statement on right and available for download on our [ESG Resource Center](#).



### LRQA Independent Assurance Statement

Relating to Nasdaq's Supplier Data for the calendar year 2022

This Assurance Statement has been prepared for Nasdaq, Inc. in accordance with our contract.

#### Terms of Engagement

LRQA was commissioned by Nasdaq, Inc. (Nasdaq) to provide independent assurance of its U.S. addressable spend from U.S. based, diverse-owned suppliers and suppliers by spend covering purchased goods and services and capital goods that have Science-Based Target initiative (SBTi) targets for the calendar year (CY) 2022 (the Assertion). The assurance was undertaken to a reasonable level of assurance, and a materiality of 5%, using LRQA's verification procedure. LRQA's verification procedure is based on current best practise and is in accordance with ISAE 3000.

The assurance criteria covered the accuracy and reliability of Nasdaq's data and information for only the selected indicators listed below:

- Percent of U.S. addressable spend<sup>1</sup> from U.S.-based, diverse-owned<sup>2</sup> suppliers<sup>3</sup>
- Percent of suppliers by spend<sup>4</sup> covering purchased goods and services and capital goods that have science-based targets<sup>5</sup>

<sup>1</sup>Defined by Nasdaq as spend where Nasdaq has the ability to select the provider of the goods and services

<sup>2</sup>Defined by Nasdaq as a company that is at least 51% owned and operated by an individual or group that is part of a historically underrepresented or underserved group

<sup>3</sup>Defined by Nasdaq as Tier 1 and Tier 2 direct spend suppliers

<sup>4</sup>Defined by Nasdaq as targets that a supplier has set, or committed to set, in line with SBTi guidance on "supplier or customer engagement targets" as defined in Target Validation Protocol for Near-Term Targets

LRQA's responsibility is only to Nasdaq. LRQA disclaims any liability or responsibility to others, as explained in the end footnote. Nasdaq's responsibility is for collecting, aggregating, analysing and presenting all the data and information within the Assertion and for maintaining effective internal controls over the systems from which the Assertion is derived. Ultimately, the Assertion has been approved by, and remains the responsibility of Nasdaq.

#### LRQA's Opinion

Based on LRQA's approach, we believe that Nasdaq has, in all material respects:

- Met the requirements of the criteria listed above; and
- Disclosed accurate and reliable performance data and information as summarized in Table 1 below.

The opinion expressed is formed on the basis of a reasonable level of assurance and at the materiality of 5%.

**Table 1. Summary of Nasdaq's Supplier Data for Calendar Year 2022:**

Indicator	Performance
U.S. Addressable spend from U.S.-based, diverse-owned suppliers	6.8%
Suppliers by spend covering purchased goods and services and capital goods that have science-based targets	37.9%



#### LRQA's Approach

LRQA's assurance engagements are carried out in accordance with our verification procedure. The following tasks were undertaken as part of the evidence gathering process for this assurance engagement:

- interviewing relevant Nasdaq staff responsible for managing and reporting the KPIs and the related data and information;
- completing a strategic assessment/risk analysis of each KPI to determine an adequate sample;
- recalculating sampled sources to confirm accuracy and conformance with the assurance criteria; and
- verifying historical data and records for Calendar Year 2022.

#### LRQA's Standards and Competence

LRQA implements and maintains a comprehensive management system that meets accreditation requirements for ISO 14065 *Greenhouse gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition* and ISO/IEC 17021 *Conformity assessment – Requirements for bodies providing audit and certification of management systems* that are at least as demanding as the requirements of the International Standard on Quality Control 1 and comply with the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants.

LRQA ensures the selection of appropriately qualified individuals based on their qualifications, training and experience. The outcome of all verification and certification assessments is then internally reviewed by senior management to ensure that the approach applied is rigorous and transparent.

LRQA is Nasdaq's assurance provider for Greenhouse Gas Emissions reporting. This is the only additional work undertaken by LRQA for Nasdaq and as such does not compromise our independence or impartiality.

Signed

Dated: March 10, 2023

David Hadlet  
LRQA Lead Verifier  
On behalf of LRQA, Inc.  
1330 Enclave Parkway, Suite 200, Houston, TX 77077

LRQA reference: UQA00002005/5785182

LRQA Group Limited, its affiliates and subsidiaries, and their respective officers, employees or agents are, individually and collectively, referred to in this clause as "LRQA". LRQA assumes no responsibility and shall not be liable to any person for any loss, damage or expense caused by reliance on the information or advice in this document or howsoever provided, unless that person has signed a contract with the relevant LRQA entity for the provision of this information or advice and in that case any responsibility or liability is exclusively on the terms and conditions set out in that contract.

The English version of this Assurance Statement is the only valid version. LRQA assumes no responsibility for versions translated into other languages.

This Assurance Statement is only valid when published with the Assertion to which it refers. It may only be reproduced in its entirety.

Copyright © LRQA, 2023.

## Additional Resources

Nasdaq's ESG disclosures, policies, programs and practice statements are available online in our [ESG Resource Center](#) and our [Investor Relations/Annual Reports webpage](#).

## ESG Material Topics Glossary

### **Anti-Financial Crime & Anti-Money Laundering:**

Addresses the Company's policies, procedures and training in place to ensure the effective establishment and implementation of a company culture opposing money-laundering and terrorism financing.

### **Board Composition and Governance:**

Addresses the quality, integrity and oversight of the Company's Board. This topic refers to diversity factors such as gender, sexual orientation, race, ethnicity, country of origin, nationality or cultural background in the board nomination process; the quality of directors; their relevant industry experience; the level of board independence; and management and oversight of ESG/ sustainability topics at the Board level.

### **Business Ethics & Integrity:**

Addresses the Company's approach to the management of risks and opportunities surrounding ethical conduct of business, including fraud, corruption, bribery and facilitation payments, fiduciary responsibilities and other behavior that may have an ethical component. This topic addresses the Company's ability to model integrity and provide services that satisfy the highest professional and ethical standards of the industry, which means avoiding conflicts of interest, misrepresentation, bias and negligence through training employees

adequately and implementing policies (e.g., Codes of Conduct) and procedures.

This topic also addresses the quality of the Company's whistleblower program in place allowing the anonymous reporting by an employee, supplier or customer to expose information, misconduct or activity that is deemed illegal, illicit, unsafe, a waste or fraud.

**Community Engagement:** Addresses the Company's involvement in the community and their power to bring measurable change to the communities in which they operate and do business. This topic includes measures to promote community investment, positive social impact and charitable giving.

### **Customer Relationship Management:**

Addresses the Company's actions and tools used to manage customers, online strategy, sales and distribution channels, customer satisfaction and customer protection.

### **Data Privacy & Cybersecurity:**

Addresses the Company's management of risks related to the collection, retention and use of sensitive, confidential or proprietary customer data. This topic also refers to the management of risks related to the use of personally identifiable information and other customer data for secondary purposes, including marketing. Also included are social issues that may arise from the Company's approach to collecting data, obtaining consent and managing customer expectations regarding how their data is being

used, or issues that may arise from incidents such as data breaches in which personally identifiable information and other customer data may be exposed. Lastly, it addresses the Company's strategy, policies and practices related to IT infrastructure, employee training and other mechanisms used to ensure security of customer data.

### **Decarbonization & Climate Strategy:**

Addresses the Company's commitments and actions to decarbonize its business model over the near and long term. This topic also addresses the processes for identifying, assessing and managing climate-related issues integrated into financial and strategy planning and overall risk management, including the implementation of the Task Force on Climate-related Financial Disclosures (TCFD) recommendations.

This topic also addresses the management and mitigation of energy consumption and greenhouse gas (GHG) emissions that are under the Company's control, including the Company's ability to set and achieve science-based and net-zero targets in line with the goals of the Paris Agreement.

Finally, this topic addresses the Company's approach to managing environmental risks in its supply chain, including efforts to engage suppliers on their environmental performance.



**Diversity, Equity & Inclusion:** Addresses the Company's ability to ensure its culture, hiring and promotion practices embrace the building of a diverse and inclusive workforce. Initiatives to support a diverse workforce include: managerial or board level responsibility for diversity initiatives, targeted recruitment, networking groups, mentorship programs, diversity monitoring and/or training regarding diversity.

This topic also addresses the Company's efforts to promote supplier diversity.

**Employee Engagement & Satisfaction:** Addresses the Company's engagement activities centered on enhancing collaboration and communication between employees and improving their work contributions, including mechanisms to grow employee contentment, accomplishment, satisfaction and motivation regarding their jobs and associated satisfaction measurements and metrics.

**Employee Health & Well-being:** Addresses the Company's ability to create and maintain a safe and healthy workplace environment. This topic encompasses financial, physical and mental wellbeing and incorporates corporate culture, work-life balance, compensation and benefits and related training.

**ESG & Sustainable Finance Products:** Addresses the company's approach to integrate ESG in its business segments and the offers or promotions of products or services which provide an added sustainability value (e.g., ESG Advisory, Metrio, OneReport, Puro.earth; sustainable indices and green/social bonds services; services aimed to drive stronger governance/risk practices) compared to standard products or services.

**Executive Compensation & Incentives:** Addresses the Company's program to reward financial performance and operational excellence, effective strategic leadership, achievement of business unit goals and objectives and performance on material ESG/sustainability topics. This topic also refers to the Company's ability to use compensation and incentives to compete successfully for top talent and build an effective leadership team.

**Human Capital Management:** Addresses the Company's practices, initiatives and processes aimed at attracting and retaining top talent and supporting employees in developing the skills necessary to succeed in their current and next role, including regular feedback, support for career planning, degree and certification programs and leadership training.

**Innovation & Technology:** Addresses the Company's ability to foster a culture of innovation, drive productivity and increase value for its customers. This topic also includes the Company's ability to leverage technology and data to deliver insights and invest in its employees to learn leading technology skills.

**Labor Practices & Human Rights:** Addresses the Company's policies and procedures to prevent discrimination and harassment and its ability to uphold commonly accepted labor standards in the workplace, including compliance with labor laws and internationally accepted norms & standards. This includes but is not limited to ensuring basic human rights related to child labor, forced labor, exploitive labor, discrimination policy, pay equality and other basic workers' rights. This topic also addresses the Company's human rights due diligence process, mitigation and remediation actions.

**Natural Resource Consumption:** Addresses the Company's impacts on nature and its actions and commitments to mitigate them. This topic includes the Company's approach to water consumption, waste management and recycling, biodiversity and land use, including the implementation of the forthcoming Taskforce on Nature-related Financial Disclosures (TNFD) recommendations. This topic addresses the Company's approach to assess and manage nature-related risks in its supply chain.

**Policy Influence:** Addresses the Company's approach to political contributions and lobbying, including the Company's ability to provide public disclosure around political activities, political involvement, lobbying and political expenses, political contributions and lobbying spend.

**Risk Management:** Addresses the Company's responsibility for risk management, including oversight, strategic direction, policies and procedures in place to execute and implement those policies. This topic includes an Enterprise Risk Management (ERM) framework to identify and manage financial, operational, legal, regulatory (current and emerging), technology, climate, nature, business and strategic risks.

**Supply Chain Responsibility:** Addresses the Company's approach to managing social risks in its supply chain. This topic includes policies and procedures related to responsible procurement practices and topics such as human rights, labor rights, modern slavery and human trafficking.

**Support for Small & Medium-Sized Enterprises:** Addresses the Company's efforts to enable small and medium-sized enterprises (SMEs) to grow both financially and organically by providing access to the capital markets.

**Transparency & Reporting:** The Company's publicly accessible information pertaining to its governance, stakeholders, environmental performance and supply chain, including its adherence to leading ESG and sustainability frameworks and standards and regulatory and legislative disclosure mandates.

**Disclaimers**

This report focuses on Nasdaq's operations from January 1, 2022, through December 31, 2022, unless otherwise indicated. The report uses qualitative descriptions and quantitative metrics to describe our policies, programs, practices and performance. Note that many of the standards and metrics used in preparing this report continue to evolve and are based on management assumptions believed to be reasonable at the time of preparation, but should not be considered guarantees. In addition, historical, current and forward-looking sustainability-related statements may be based on standards for measuring progress that are still developing, internal controls and processes that continue to evolve and assumptions that are subject to change in the future. The information and opinions contained in this report are provided as of the date of this report and are subject to change without notice. Nasdaq does not undertake to update or revise any such statements. The information included in and any issues identified as material for purposes of, this document may not be considered material for SEC reporting purposes. In the context of this disclosure, the term "material" is distinct from and should not be confused with, such term as defined for SEC reporting purposes.

The information and data in this report cover Nasdaq's owned and operated businesses and does not address the performance or operations of our suppliers or contractors unless otherwise noted.

The report includes information on topics that we have identified as significant impact topics relating to ESG matters based on our 2022 ESG materiality assessment. For more information on our significant impact process, please see page 15 of this report. All financial information is presented in U.S. dollars unless otherwise noted.

This report contains forward-looking statements relating to Nasdaq's operations that are based on management's current expectations, estimates and projections. See the "Cautionary Note Regarding Forward-Looking Statements" below.

Therefore, the actual conduct of our activities, including the development, implementation or continuation of any program, policy or initiative discussed or forecasted in this report, may differ materially in the future. As with any projections or estimates, actual results or numbers may vary.

**Cautionary Note Regarding Forward-Looking Statements**

Information set forth in this communication contains forward-looking statements that involve a number of risks and uncertainties. This report contains forward-looking statements relating to Nasdaq's operations that are based on management's current expectations, estimates and projections regarding the ESG matters described in this report. Words or phrases such as "can", "aims", "expect", "intends", "plans", "targets", "believes", "seeks", "may", "could", "should", "will", "goals", "objectives", "strategies", "opportunities" and similar expressions are intended to identify such forward-looking statements.

Nasdaq cautions readers that any forward-looking information is not a guarantee of future performance and that actual results could differ materially from those contained in the forward-looking information. Such forward-looking statements include, but are not limited to (i) statements about our climate, ESG or sustainability policies, programs, products or initiatives, (ii) projections relating to our future financial results, total shareholder returns, growth, trading volumes, products and services, order backlog, taxes and achievement of synergy targets, (iii) statements about the closing or implementation dates and benefits of certain acquisitions or divestitures and other strategic, restructuring, technology, de-leveraging and capital return initiatives, (iv) statements about our integrations of our recent acquisitions, and (v) other statements that are not historical facts. Forward-looking statements involve a number of risks, uncertainties or other factors beyond Nasdaq's control. These factors include, but are not limited to, Nasdaq's ability to implement its strategic initiatives, economic, political and market conditions and fluctuations, government and industry regulation, interest rate risk, U.S. and global competition and other factors detailed in Nasdaq's filings with the U.S. Securities and Exchange Commission, including its most recent Form 10-K and quarterly reports on Form 10-Q, which are available on Nasdaq's investor relations website at <http://ir.nasdaq.com> and the SEC's website at [www.sec.gov](http://www.sec.gov). Nasdaq undertakes no obligation to publicly update any forward-looking statement, whether as a result of new information, future events or otherwise.

**Website Disclosure**

Nasdaq intends to use its website, [ir.nasdaq.com](http://ir.nasdaq.com), as a means for disclosing material non-public information and for complying with SEC Regulation FD and other disclosure obligations.