



London
Stock Exchange Group

Code of Conduct

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Group CEO's message

Being part of London Stock Exchange Group (LSEG) involves a commitment to respecting and protecting our business and brand in all its forms, since the trust that we are capable of inspiring will be based on our own individual attitudes, actions and expressions.

Our company's reputation is built upon, and affected by, the decisions and actions each and every one of us takes; protecting and enhancing our reputation is one of the most important considerations anyone employed within London Stock Exchange Group has to take.

As we continue to work towards our vision to be one of the world's leading and most trusted and admired exchange groups, we need to keep in mind our Code of Conduct, at all times. LSEG's Code of Conduct reflects how we should think and feel about doing business, how we distinguish ourselves and how we should behave as a company, towards all our stakeholders, and each other.

Our Code of Conduct outlines our individual responsibilities. This Code is the link between our corporate values and our day-to-day business policies and practices. Wherever possible, we insist that others outside the company who work with us apply the same rules.

Our Code of Conduct reflects our core corporate values of:

- **Partnership** - collaboration is the key to long-term growth and we pride ourselves on being partners who fully engage with our wider ecosystem
- **Integrity** - this underpins all that we do and is grounded in our unshakeable commitment to building global markets based on trust and transparency
- **Innovation** - ambitious and forward-looking, we are collectively a group of market innovators, driven by fresh thinking, that has kept us ahead of the changing landscape

Our Code of Conduct aims to guide all employees on how we should behave and tackle any difficult decisions and situations we may find ourselves in. They commit us to:

- Behaving ethically, with integrity and honesty
- Competing fairly
- Working in partnership with our customers and avoiding conflicts of interests and abuses of power
- Providing high quality products and services and value to customers
- Treating colleagues fairly and with respect
- Dealing with business partners fairly
- Managing the company with the highest standards of corporate governance and best practice

LSEG's Code of Conduct underpins our approach to managing risks and expresses our determination in providing fair and equal employment in a healthy and safe workplace, safeguarding the environment and making a valuable contribution to the communities in which we operate.

Our reputation and the people who work at London Stock Exchange Group are our most valuable assets. Please take a moment to review and reflect on our Code of Conduct, so that we all can ensure that we act with integrity and trust in all that we do.

Xavier Rolet
CEO
London Stock Exchange Group

1. Introduction

As a commercial public company that operates at the heart of global capital markets, integrity, partnership and innovation are central to our success.

We expect all LSEG staff, regardless of geography or discipline, to understand these core values and to reflect them in the way they work, collaborate and engage with colleagues, customers and other stakeholders. We expect the highest standards of integrity and behaviour in everything we do.

We are keenly aware that the trust of our varied stakeholders is critical to sustaining our long-term strength and growth. We want our customers to know that they have chosen the best possible partner for their own business success, our shareholders to know that their investment is in skilled and capable hands, and our staff to know that our organisation offers a fulfilling and stimulating environment to work.

The nature of our business also means we must ensure that we are focused on maintaining our reputation for acting openly and honestly in all our business dealings and treating all of our stakeholders including our customers, shareholders, directors and staff as valued partners in our business. We also have a responsibility to our wider stakeholder group including regulators, policy makers, market participants, corporations and the public.

This code of conduct reflects how we should think and feel about doing business and how we distinguish ourselves as an international group.

Our shared values of **partnership, integrity and innovation** guide how we conduct our relationships with one another and our stakeholders.

2. Objectives

The objective of the Code of Conduct policy is to set out the ethical and behavioural framework which should govern London Stock Exchange Group's (LSEG) activities (including those of its subsidiaries and non-wholly owned subsidiaries). It forms the basis of all employees' interactions internally and externally. The purpose and objective of the Code of Conduct is to:

- communicate to all staff the framework within which we expect our business to be conducted;
- provide consistency of approach to all our operations, wherever they are in the world;
- promote open and honest conduct including fair dealing and ethical handling of conflicts of interest;
- promote compliance with applicable laws and governmental rules and regulation in each of the countries we operate in;
- ensure the protection of the company's legitimate business interests; and
- set out our support for the communities in which we operate.

The Code of Conduct policy is not intended to be comprehensive description of all factors that impact the quality of your professional and personal behaviour but it should be used as an ethical framework in which we all operate in. The code also sets out where further information and guidance is available.

All directors, officers and staff of LSEG are expected to be familiar with the Code of Conduct and adhere to the principles set out within the policy. This Code of Conduct complements our Group behavioural framework and our brand guidelines.

3. Scope & Application

This Policy applies to LSEG and all entities and operations within the Group. All directors and staff, including temporary, contracted or secondees, must comply with this policy.

Equivalent codes of conduct are expected from business partners and suppliers.

4. Stakeholders

Customers

As a Group we will understand, meet and strive to exceed the needs of our customers. We are committed to a partnership approach with our customers, working to understand their needs and their business ambitions. We are committed to providing value for money, high quality, consistent and reliable services, recognising this as a prerequisite for a successful, innovative and sustained business relationship. We will treat all customers fairly, openly and honestly.

Shareholders

We seek to enhance shareholder value and provide superior returns in a way which is consistent with our Code of Conduct, recognising that wealth generated benefits customers, staff and the communities in which we operate.

We conduct our business in accordance with the principles of good corporate governance. By communicating with and listening to our existing and potential investors, we seek to forge long-term relationships based on mutual understanding integrity and trust.

We are committed to providing timely, regular and reliable information on our activities, strategy, financial performance and likely prospects. This includes keeping accounting records which accurately disclose the financial position of the business, and publishing financial statements which ensure transparency of financial information on the Group's financial performance.

Employees

Our staff are our most valuable asset and are fundamental to the success of our business. We want staff to feel proud of working for LSEG and the Group is committed to providing a safe, fulfilling and stimulating work environment which

allows staff to deliver to their full potential, developing and enhancing skills and knowledge for the benefit of the business, our customers and themselves.

Attracting and retaining high calibre staff is critical to our success and our remuneration and incentive systems are designed to provide a clear link between performance and reward. Maintaining a working environment that provides training and development opportunities for personal development also forms an important part of our commitment to our staff.

Business partners & suppliers

We are committed to establishing mutually beneficial relations with our suppliers and business partners and we honour and enforce the terms of the contracts to which we commit. We conduct our operations with integrity and in accordance with the principles of fair competition and will not tolerate the offer or acceptance of any gift, hospitality or other inducement designed to influence unduly a decision. The giving and receiving of legitimate gifts or hospitality must be transparent and reported in line with our gifts and hospitality policies. We strive only to do business with organisations who uphold similar business principles. These principles apply to partners and suppliers wherever they are located in the world.

Regulators

We are committed to operating within a fair and independent regulatory framework which complies fully with the provisions laid down by the regulatory bodies and the legal frameworks in the countries in which we operate.

We are focused on the maintenance of orderly and proper markets that balance the needs of our diverse market participants and provide appropriate transparency and protection for investors. Our regulatory, strategy and legal teams are responsible for ensuring that our regulatory and legal obligations are understood and complied with throughout the business. We cooperate openly and proactively with our regulators.

Community

We are a 'good neighbour' to our community and endeavour to be sensitive to the cultural and social principles of the communities in which we conduct business. We see ourselves as partnering with our community in much of what we do and we contribute directly and indirectly to the communities' general well-being. Our activity and role in the economy means that our commitment extends beyond standard corporate community activities. We recognise the role we play, in amongst other things, societies' capital allocation and job creation. We operate community programmes in UK, Italy and Sri Lanka which support charitable and other good causes and we actively encourage and support our directors, officers and staff in making personal contributions to their community. We at all times operate with integrity in our community relations.

Environment

We recognise that our activities inevitably have an impact on the environment and as a Group we look for innovative ways to reduce the environmental impact of our business by embracing the principles of sustainable development and committing to a process of minimising environmental impacts and pollution.

5. Ethical principles

Maintaining our reputation depends on everyone within the Group maintaining the highest standards. This section sets out the behaviours that are expected of everyone within LSEG and is designed to help directors, officers and staff interpret and implement the principles outlined above.

Integrity and Honesty

Integrity and honesty are at the heart of our business. Accordingly, we expect our directors, officers and staff and business partners to maintain the highest standards in respect of these, in everything they do.

We conduct our business in a manner that is ethical, compliant with legal and regulatory requirements, and aims to avoid even the appearance of impropriety. We do not give or receive, either directly or indirectly, bribes or other improper advantages for business or financial gain. Our corporate motto is “Dictum Meum Pactum”, meaning ‘My word is my bond’.

Professional Behaviour

We expect all our directors, officers and staff to behave professionally. All our directors, officers and staff must comply with applicable regulations and legislation within which we operate. This includes our directors, officers and staff respecting relevant laws and regulations and complying with both the letter and the spirit of the laws and regulations of the countries in which we operate.

Over and above this, all our directors, officers and staff should strive to behave in a manner that is fair and just, rather than just complying with minimum legal standards. We expect our directors, officers and staff to avoid any behaviour, even in appearance that negatively impacts the reputation of LSEG or the entities within the Group. We expect all employees to be courteous, considerate and professional in all their work or work related activities. We also expect these standards of behaviour to apply to the personal lives of all directors, officers and staff in so much as reputationally this could impact on LSEG.

Conflicts of interest

Both as a company and as individual directors or employees, we avoid or declare conflicts of interest that may lead (or be seen to lead) to divided loyalties, either now or in hindsight. Conflicts of interest may arise when a director or employee has:

- Outside business activities or directorships which detract from the individual’s ability to devote appropriate time and attention to The Group or conflict with their role or the objectives of The Group

- Significant ownership or interest in a supplier or customer
- Consulting relationship with third parties

We expect all staff to comply with Group policy on share dealing.

Insider dealing

By nature of our work, directors or staff may have access to information that is price sensitive. If any directors or staff trade on the basis of such information or enable others to trade on the basis of such information, this would likely to be considered market abuse, the penalty for which could be imprisonment.

We require that our directors, officers and staff never enter into any transaction in the securities of LSEG or any company listed or quoted on our markets/ or any other quoted or listed company while they are in possession of non-public information about that company.

Fair business practices and business relationships

The Group is committed to succeeding through fair business practices and does not seek a competitive advantage through unethical or illegal practices. Directors, officers and staff members should endeavour to deal fairly with customers, partners, suppliers, competitors and other directors, officers and staff. We behave with integrity and never take unfair advantage through manipulation, misrepresentation, concealment, harassment, abuse of confidential information or any other unfair dealing or practice.

When selecting suppliers or contractors, or partnering with external stakeholders, we base our decisions on an objective business rationale and not personal interests or bias.

Competition

We believe in vigorous and fair competition. By innovating and building continually on our in-depth knowledge of our products and services, our business partners and our customers will also benefit. We aim not only to understand their needs but also to exceed their expectations.

In competing for business, we do so fairly, ethically and in a way that fully complies with all applicable laws and regulations. Our directors, officers and staff should not offer or accept gifts or bribes or undertake inappropriate activities to facilitate business.

Equal Opportunities & Diversity

We value diversity and fairness in the workplace and recognise that they create a productive and creative environment that is good for our business, allowing us to meet the challenges of the competitive market in which we operate.

We recruit, employ, promote and reward directors, officers and staff solely on the basis of the qualifications, experience, abilities and competencies required for the role. We seek to attract, retain and motivate people from many backgrounds and perspectives.

We will never tolerate bias, discrimination, intimidation or harassment of our directors, officers and staff.

Confidentiality

Receiving confidential information is a routine part of our work. We never disclose confidential information (except where required by law or regulation) or use such information improperly. Information received must never be misused for personal or third party benefits.

We maintain a confidentiality policy with which all directors, officers and staff are required to confirm compliance on a regular basis.

Political Activities

We take our public policy responsibilities very seriously and engage with government, regulators, policy makers and political parties in a neutral manner in order to make our position known on any matters that affect us, our directors, our staff, our customers, our shareholders or the markets in which we operate. As an apolitical organisation, we do not make payments or provide other direct or indirect support to political parties and organisations or their representatives.

We respect the rights of individuals to hold personal political views. However, individuals should not allow their political views to affect their behaviour or decisions at work and nor should they represent or construe their views to be view of the LSEG.

Disclosure

The Group is committed to full, fair, clear, accurate and timely public communications including all financial and regulatory reporting. Only authorised individuals may make public communications on behalf of the LSEG or constituent entities.

All directors, officers and staff involved within public communication must comply with the Group Communication and Media policy and Group Branding policy which require due considerations to LSEG's position or brand prior to undertaking public disclosures or communications. Directors or employees involved with the disclosure process must not knowingly cause others to misrepresent facts about the Group to others, whether within or outside the company.

The Group is committed to delivering the highest standards in financial transparency in the preparation of annual and other reports. We will neither

establish nor maintain unrecorded accounts, assets or liabilities, nor knowingly evade tax and other fiscal obligations.

Protection and proper use of assets

All directors, officers and staff should protect the company's assets and ensure their efficient use. Company assets should be used for legitimate business use. Directors, officers and staff are permitted incidental personal use of LSEG communications systems provided this does not breach company policy.

6. Review cycle

The Code of Conduct Policy is required to be reviewed by the Responsible Executive for continuing relevance and applicability. The review process will be undertaken on at least an annual basis and as required when internal or external events indicate a more frequent review is required, for example material events within the market, or regulatory changes.

After the policy has been reviewed, and revised if required, by the Policy Owner, it must be approved by the Board.

7. Monitoring and Non-Compliance Handling

Self-Certification Process

The Code of Conduct Policy will be subject to an annual self-certification process. This self-certification process is a mandatory requirement for all directors, officers and staff.

Reporting Unethical Behaviour and Whistle Blowing

The Board and Executive Committee are responsible for applying this policy to specific situations in which questions are presented to it and has the authority to interpret this policy in situations presented to it.

Since LSEG aims to maintain the highest ethical standards in carrying out its business activities, behaviour or practices by directors, officers or staff that are incompatible with this Code of Conduct and underlying policies will not be tolerated and will result in disciplinary proceedings, which may include dismissal.

LSEG aims to create an environment in which directors, officers and staff feel able to voice genuinely held concerns about behaviours or decisions that they perceive to be unethical. Therefore, any employee must immediately report any conduct or activity which may violate our Code of Conduct or any relevant law or regulation to their line manager, Group Audit, the Group Company Secretary or through the local independent whistle-blowing arrangements. In addition, any suspected or actual instances of fraud must be reported to Group Audit immediately and prior to any local investigation taking place.

The Group's whistle-blowing arrangements ensure that confidential reporting systems are in place for such reporting and we will never tolerate retaliation against anyone who, in good faith, brings such issues to our attention.

8. Waivers and Exceptions

Any instances where a waiver to this policy is sought must be approved by the Board.

9. Reporting Requirements

Self-Certification

The results of the annual self-certification and any incidences of non-compliance will be reported to the Executive Committee and to the Board.

10. Additional Information

All directors, officers and staff are expected to be familiar with all Group policies.

For additional information or assistance please contact the Chief of Staff, Head of HR, Chief Risk Officer, or Company Secretary.