CME Group

Procedures for Handling Complaints about Accounting Matters

As part of the Global Corporate Compliance & Ethics Program of CME Group Inc. and its subsidiaries (collectively, the ***"Company"***) and in accordance with the Sarbanes-Oxley Act, the Audit Committee has established the following procedures for: (i) the receipt, retention and treatment of complaints and concerns received by the Company regarding accounting, internal accounting controls, auditing matters, financial reporting or disclosure matters or other matters relating to actual or alleged violations or potential violations of any law, rule or regulation relating to securities or to fraud against shareholders (collectively, ***"Accounting Matters"***); and (ii) the confidential, anonymous submission by Company employees of complaints or concerns regarding Accounting Matters.

Scope of Matters Covered by Policy

These procedures relate to complaints or concerns with respect to Accounting Matters, including, without limitation, actual or alleged instances of the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal controls over financial reporting, including attempted or actual circumvention of internal controls, including matters allegedly relating to the Sarbanes Oxley Act;
- misrepresentation or false statements to or by a senior employee or accountant regarding a matter contained in the financial records, financial reports, certification process relating to the Company's internal controls over financial reporting or audit reports of the Company;
- mail fraud, wire fraud, bank fraud, securities fraud, violation of any Securities and Exchange Commission ***("SEC")*** rule or regulation or violation of any federal law relating to fraud against shareholders;
- any reports of in-house attorneys in accordance with the attorney conduct rules of the SEC; or
- any deviation from full and fair reporting of the Company's financial condition.

Submitting Complaints

The Company has adopted the following procedures for reporting complaints on Accounting Matters on a confidential and anonymous basis (where permitted by applicable law):

- Via the Internet by visiting www.ethicspoint.com or by clicking on the following QR Code:



- Via telephone by calling the CME Group Compliance & Ethics Helpline:

  India: 00080008 20472
  United Kingdom & Northern Ireland: 0800 007 4220
  United States and Canada: 877.338.4545
  Additional numbers for CME Group's local offices are available on www.ethicspoint.com and via CME Group's Intranet, OpenExchange.

- Via email through directors@cmegroup.com

Reports may also be submitted by mail to the Managing Director, Chief Enterprise Risk Management ***("ERM")*** & Compliance Officer ***("Chief ERM and CO")*** or the General Counsel at the following address:

CME Group Inc.
20 South Wacker Drive
Chicago, Illinois 60606

Reports submitted in writing may be marked with a legend such as: ***"To be opened by the Audit Committee only. Submitted pursuant to the Procedures for Handling Complaints about Accounting Matters adopted by the Audit Committee."*** All such reports will be forwarded unopened to the Chairperson of the Audit Committee.

The Company also has adopted and regularly educates colleagues about a **Speak Up and Escalation Policy** which sets forth the Company's expectations for employees and managers to report and escalate compliance and ethical concerns to the organization, including Accounting Matters.

Although any person with a complaint or concern regarding a potential Accounting Matter is encouraged to report allegations directly to the Company, these procedures do not require such person first to report such complaint or concern directly to the Company and in no way limit or prevent such person from reporting such complaint or concern directly to the proper governmental and regulatory authorities.

Treatment of Complaints

The Audit Committee has designated (1) the Chief Audit Executive and Head of Global Assurance ***("CAE")*** and (2) the Chief ERM & CO as authorized representatives to assist the Audit Committee in assessing and dispositioning reported complaints and concerns regarding potential Accounting Matters.

Recipients within the Company of any such complaints or concerns are required to escalate them in accordance with the Company's **Speak Up and Escalation Policy** or they may escalate them directly to the CAE or the Chief ERM & CO.

Escalated Accounting Matter. Upon receipt of any allegation relating to a potential Accounting Matter, the CAE and Chief ERM & CO will promptly determine whether the reported allegation relates to an **Escalated Accounting Matter** as described below:

(i) the matter involves a member of the Board of Directors or any Senior Managing Director;

(ii) the matter involves or is reasonably likely to involve a sum in excess of $250,000;

(iii) the matter has been reported to the SEC, the Public Company Accounting Oversight Board ***("PCAOB")*** or any other proper governmental or regulatory authority with jurisdiction applicable to any Accounting Matter;

(iv) the matter involves concerns or allegations relating to internal controls, the financial statements of the Company or the Sarbanes-Oxley Act; or

(v) the matter is potentially material or could significantly affect the reputation of the Company.

If the CAE and Chief ERM & CO determine the matter is an **Escalated Accounting Matter**, the CAE and Chief ERM & CO will promptly report such allegation to each of the Chairperson of the Audit Committee; the Chairman and Chief Executive Officer; the Chief Financial Officer, the Chief Accounting Officer and the General Counsel, unless any such person is the subject of the allegation. Such allegation will then be reviewed on a timely basis to determine, based on the nature and extent of the allegations, how and by whom such complaint or concern should be investigated and the extent to which the full Audit Committee, the Risk Committee or the Nominating and Governance Committee (the Chair or entire Committee) should be involved.

The Audit Committee may enlist employees of the Company and/or outside legal counsel or other advisors as appropriate, to conduct any investigation of a complaint regarding an Accounting Matter.

Non-Escalated Accounting Matters. If the matter is determined to relate to an Accounting Matter, but not an Escalated Accounting Matter (e.g., an immaterial expense policy violation), then such complaint or concern shall be reported promptly to the Chief Financial Officer and the Chief Accounting Officer and then handled by the Company in accordance with its established procedures.

Non-Accounting Matter. If the allegation is not an Accounting Matter, then such allegation will be handled in the same manner as other complaints or concerns are handled by the Company in accordance with its established procedures.

All Accounting Matters, regardless of whether they are determined to be an Escalated Accounting Matter, shall be reported by the Chief ERM & CO to the Audit Committee on a quarterly basis.

Retention of Complaints and Concerns

Copies of all complaints, investigative reports, summaries of reports and other documents relating to Accounting Matters will be retained by representatives of the Global Corporate Compliance & Ethics Team in accordance with the Company's established guidelines for investigation processes and procedures and the Company's **Records and Information Management Policy**.

Confidentiality

The Company will maintain confidentiality regarding discussion, inquiries and the identities of person(s) reporting complaints or otherwise potentially involved to the extent possible, consistent with the need to carry out an appropriate and adequate evaluation or investigation of the matters described in a complaint or concern during any review or investigation; and further, all reasonable attempts will be made to protect the anonymity of person(s) reporting complaints or concerns on an anonymous basis and of witnesses who request to have identities remain anonymous; in each case, except in connection with legal or other governmental proceedings or as required by law.

Non-Retaliation Policy

It is the Company's policy not to discharge, demote, suspend, threaten, harass or in any manner discriminate or retaliate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to the reporting of complaints made based on reasonable belief that misconduct may be occurring regarding Accounting Matters or otherwise.

The Committee will not tolerate retaliation against any person who reports potential issues to the Committee based on a reasonable belief that misconduct may be occurring.

Adopted: September 4, 2003; last revised December 3, 2024 and last reviewed December 9, 2025; Helpline phone numbers updated October 15, 2026