



Trading Policy

CME Group has adopted securities law compliance policies applicable to all employees and Board members. Pursuant to these policies, employees and Board members are prohibited from buying and selling securities while in possession of material, nonpublic information about the issuer of that security, whether the issuer is CME Group or another company. Passing such information on to someone who may buy or sell securities, commonly known as “tipping”, is also prohibited. Our securities law compliance policies also provide that executive officers and Board members must pre-clear all transactions in CME Group securities with the Office of the Corporate Secretary. In addition, all executive officers and Board members are subject to regular quarterly blackout periods during which they may not purchase or sell CME Group securities or engage in the exercise of a stock option that involves the sale of CME Group stock.