



LEADING WITH CONVICTION AND INTEGRITY

GUIDE TO CONDUCTING BUSINESS FOR THIRD PARTIES OF CME GROUP	CME Group Policy Document No. and Version No.:	0008 Version 9.0
	Policy Document Issued By:	Global Corporate Compliance & Ethics Team
	Contact Information:	Corporate Compliance
	Date Policy Document Originally Issued:	September 2013
	Date Policy Document Last Revised:	May 2023

PURPOSE AND STATEMENT OF GUIDE

The CME Group organization, including those entities where CME Group is not the sole owner but has control of the entity including its subsidiaries (collectively, “**CME Group**” or the “**Company**”) is committed to firmly adhering to ethical business practices in dealing with its clients, vendors, regulators, business partners, shareholders and others.

For a “culture of compliance and ethics” to work, every person who assists us with our business must act ethically and ensure his or her actions are consistent with the law and relevant CME Group policies. This means understanding our principles and the policies we’ve put in place to help implement those principles. It also means when a question or problem occurs, people respond with care rather than ignoring the issue or simply guessing.

This Guide is designed to help any third party working with us or on our behalf, such as our external consultants, agents, vendors and strategic partners, to have a basic understanding of CME Group’s standards for business conduct. It shows how our policies translate into our conduct and explains what we aim for to comply with these policies.

CME Group understands that many companies have their own code of conduct that addresses the topics in this Guide. Our expectation is not that our vendors replace their code with this Guide, but rather than our vendors ensure that they have consistent treatment in their code, address any CME Group-specific issues and requirements with their staff in supporting CME Group, and meet the reporting expectations in this Guide. Compliance with this Guide will be considered in decisions regarding continuing service with a vendor and also decisions regarding whether a particular individual can continue to provide services for CME Group.

Nothing in this Guide is meant to supersede any specific contractual arrangements between CME Group and any third party. In the event of conflict between the terms of a specific contract and this Guide, the contract terms will prevail.

The failure or omission of CME Group to insist upon strict performance and compliance with any of the provisions of this Guide at any time shall in no way constitute a waiver of its rights.

APPLICABILITY AND SCOPE

We expect all third parties assisting us with our business to conduct business on our behalf responsibly and in compliance with global laws and regulations and to report any concerns to us and make sure that suspect behavior does not go unchallenged. When conducting business on our behalf, you are expected to demonstrate your commitment to the standards set forth in this Guide. You must promptly inform your CME Group contact or a member of CME Group management or Corporate Procurement when any situation develops that causes you to operate in violation of this Guide.

DUE DILIGENCE

Where appropriate, CME Group conducts risk-based due diligence on third parties as part of assessing its relationship with third parties and any associated risks from such engagement. CME Group expects third parties to provide complete and accurate information to facilitate these due diligence efforts undertaken by CME Group, where requested.

CONFLICTS OF INTEREST

Certain types of relationships can present potential or actual conflicts of interest. All third parties working on behalf of CME Group must avoid entering into an arrangement that conflicts with your responsibilities to CME Group. A conflict of interest arises when you have a personal or financial relationship or other interest that could interfere with your obligation to act in the best interests of CME Group, or when your outside business activities interfere with your ability to perform your services to CME Group.

Any potential conflicts of interest must be discussed with Corporate Procurement and the applicable business owner in consultation with Corporate Compliance, as necessary, as part of the engagement process. To the extent a conflict of interest arises during the course of your services, you must promptly inform your CME Group contact or a member of CME Group management or Corporate Procurement.

PROTECTING CME GROUP INTELLECTUAL PROPERTY

CME Group's intellectual property is among its most valuable assets, and includes without any limitation copyrights, patents, trademarks, trade secrets, logos, photos/videos, other intangible industrial and commercial property or other proprietary rights.

To the extent permitted by law, and where you agreed as a condition of your engagement to provide services to the Company, CME Group has the rights to all intellectual property you create while providing services to the Company that relates to CME Group business; and/or results from you carrying out your duties or services; or relates to CME Group's actual demonstratively anticipated research or development. This is true regardless of whether the intellectual property is patentable or protectable by copyright, trade secret or trademark.

We also respect all third-party intellectual property rights and other intangible commercial rights belonging to others. You should never knowingly infringe upon those rights. Our duty to respect such rights applies to any business activities we conduct, including the creation of any internal or external communications or marketing materials.

PROTECTING AND PREVENTING THE MISUSE OF CME GROUP CONFIDENTIAL AND MATERIAL, NON-PUBLIC INFORMATION

All third parties requiring access to CME Group Confidential and Highly Sensitive Information (as defined in the [Confidentiality and Data Protection Policy](#)), including our clients, must execute an appropriate confidentiality agreement and/or receive approval from CME Group's legal counsel prior to accepting or gaining access to such information.

You must always take appropriate precautions to ensure that CME Group Confidential and Highly Sensitive Information, whether proprietary to us, our clients or another company, is communicated on a confidential basis only to those individuals who have a need to know such information to perform their job responsibilities. Insofar as you agreed as a condition of

your service to CME Group, you must follow all Company policies and procedures relating to the protection of CME Group information as well as project-specific security or privacy requirements as described in the [Confidentiality and Data Protection Policy](#). Copies of other policies referenced therein should be provided to you in connection with your engagement by Corporate Procurement.

DATA PROTECTION

CME Group expects its third parties to respect and safeguard the privacy of CME Group employees and customers. Third parties are required to take all reasonable and appropriate steps to safeguard personal data provided in connection with services provided to CME Group in accordance with CME Group's [Confidentiality and Data Protection Policy](#). Third parties may only collect, process, use, store and retain personal data obtained from CME Group as necessary and in compliance with applicable privacy / data protection and information security laws and regulations.

In the event a third party collects, processes, uses, stores, or retains personal data on CME Group's behalf, such third party must follow all agreed to contractual obligations relating to compliance with applicable data protection regulations.

ACCESS AND USE OF CME GROUP ELECTRONIC MEDIA

Generally, third parties will use their own laptops or computers to accomplish their work. In those circumstances where a third party may be given access to CME Group's electronic environment (Intranet, email, voicemail or other), third parties will adhere to applicable CME Group policies.

You will not knowingly download, view or forward materials of a discriminatory, harassing, threatening, sexual, pornographic, racist, sexist, defamatory or otherwise offensive in nature on the CME Group network, using any CME Group device or to any CME Group colleague. It is expected that CME Group electronic media is used for business purposes only.

You will communicate protected information (personal, confidential or trade secret) in a way that recognizes the sensitivity of the information, the possibility of unauthorized access and compliance with local data protection laws.

You understand that documents, software, emails and other webpages could bring damaging computer viruses into CME Group's network. You will not knowingly detach, decompress, run/launch or install any files or programs on CME Group's systems or open attachments that have damaging computer viruses. You will also not download or disseminate any material from the Internet unless the copyright owner has provided consent.

Any third party who provides media storage on behalf of CME Group must also adhere to the timing and methods for retention and destruction of CME Group data as described in the Company's [Records and Information Management Policy](#), copies of which will be provided as part of such engagement by Corporate Procurement.

ANTI-BRIBERY AND ANTI-CORRUPTION

Our policy is to comply with all laws in the jurisdictions in which we conduct business, including all anti-bribery and anti-corruption laws.

No third party may directly or indirectly offer, promise, grant or authorize the giving of money or anything else of value to anyone to obtain an improper advantage for or on behalf of CME Group. Third parties are also prohibited from requesting, agreeing to receive or accepting anything of value with the intention of providing or receiving an improper advantage for or on behalf of CME Group.

Anything of value includes cash or cash equivalents (e.g., gift cards), gifts, gratuities, goods, entertainment, tickets, meals, drinks, travel, lodging, charitable contributions, political contributions, training, services, personal favors, offers of employment or internships, hiring a friend or relative, or anything else that is valuable to the recipient even if it would not be valuable to anyone else. Given the broad interpretation, it is important that you understand our policy.

Improper advantage includes such things as influencing an individual to act in violation of his or her duty. Even if it was not the intention, any perception of impropriety must be avoided.

Corruption can occur when dealing both with commercial partners and government officials. Although some anti-bribery laws focus on government bribery, our anti-bribery and anti-corruption policies apply to both the public and the private sectors.

GIFTS AND ENTERTAINMENT

Vendors, suppliers, external consultants working for us should not provide gifts or entertainment in connection with CME Group business to any third parties unless specifically authorized to do so in connection with the engagement.

Gifts and entertainment are often used to establish and foster business relationships, improve one's image and better present one's products and services. They often are considered a form of courtesy and are common in everyday business in many countries. However, such activities have the potential to be used as (or may be perceived as) bribes to obtain an improper advantage or otherwise unduly influence a decision. Therefore, it is CME Group policy to limit gifts and entertainment that may appear to compromise the integrity and judgment of an individual or may create an apparent or potential conflict of interest.

A **gift** may include anything of value for which an individual is not required to pay the retail or usual and customary cost. **Entertainment** may include meals, drinks, business dinners, tickets to events, sightseeing, golf outings and transportation.

Gifts and entertainment provided to individuals who are "government officials" are subject to stricter standards. The definition of **government official** is very broad and may not always be apparent. It covers anyone working for a government entity at any level, which can include any state-owned enterprise, government agency or public organization such as sovereign wealth funds, central banks (*World Bank*), international organization (*United Nations*), state universities, public pension funds, state-owned exchanges (*KRX*) and state-owned clearing firms (*ABN AMRO Clearing Chicago LLC*, whose parent company is Dutch-state owned), regulators of CME Group (*Commodity Futures Trading Commission (CFTC)*, *Financial Conduct Authority (FCA)*, *Securities and Exchange Commission (SEC)*,

Netherlands Authority for the Financial Markets (AFM)), utilities, certain media, civilians performing public functions, anyone treated as a government official under local law, candidates for political office, political party officials or anyone associated with a political party, and anyone acting for the benefit of, or in a position of influence to, a government official, such as a friend or family member. It may also include anyone acting for the benefit of, or in a position of influence to, a government official such as a friend or family member.

Particular concerns arise when gifts or entertainment are in some way connected with a potential transaction, business relationship or regulatory approval. Even when there is no improper intent, such intent may be inferred from the surrounding circumstance. You may not offer anything of value to obtain or retain a benefit or advantage for the giver, and you should not offer anything that might appear to influence, compromise judgment, or obligate a CME Group colleague. The recipient should not be given the impression they are under an obligation to confer any business advantage or the recipient's independence will be affected.

This Guide cannot address all the corruption issues raised by local legal requirements, which may be more restrictive than our global standards. Where necessary, seek additional guidance from CME Group [Corporate Compliance](#) or your local business contact at CME Group who can consult any of our available compliance resources.

CME Group colleagues may accept gifts and entertainment provided that are in compliance with the [Code of Conduct](#) and the [Gifts and Entertainment Policy](#), copies of which are made available to such colleagues. Note that, other than meals with an expected value of US\$50 or less per person during which the potential services are discussed, CME Group employees may not accept gifts or entertainment from vendors or potential vendors when negotiations are occurring, while a proposal for new business or a renewal of business is pending or when there is a potential bidding process when such individual has the potential to influence the vendor selection or the contract terms.

HANDLING “INSIDE INFORMATION” APPROPRIATELY AND LAWFULLY AND PARTICIPATING IN THE MARKETPLACE ON FAIR TERMS

Most jurisdictions where CME Group conducts its business prohibit by law insider trading and other forms of market abuse.

If you are aware of or have access to material, non-public information relating to CME Group or to any other company as a result of your services to CME Group, you may not buy or sell, directly or indirectly through a family member or other person or entity, CME Group or the other company's securities or give, communicate, or in any way convey such information to another person.

FAIR COMPETITION AND ANTITRUST

All third parties representing CME Group are expected to comply with all applicable laws and regulations regarding fair competition and antitrust. We place a duty on our third parties to report any violation that is suspected or discovered, through and of the Available Resources listed below.

FINANCIAL CRIME AND MONEY LAUNDERING

CME Group does not tolerate financial crime, including money laundering and terrorist financing activities.

CME Group defines financial crime as illegal acts carried out for financial or economic gain. CME Group defines money laundering as the process by which proceeds from illegal activities are disguised so they appear to be from legitimate sources. This includes concealing, acquiring, using or possessing such proceeds or facilitating the acquisition, use, retention or control of such proceeds.

Third parties shall not provide any service or enter into any arrangement that facilitates or may constitute CME Group being involved directly or indirectly in economic crime, including money laundering activities. Third parties shall not channel any funds to, or support, illegal activities (e.g., terrorism, tax evasion, fraud).

TRADE COMPLIANCE

Third parties representing CME Group are expected to comply with the letter and spirit of all applicable import and export controls and trade compliance laws and avoid doing anything that would position themselves or CME Group in violation of applicable economic sanctions and export control laws. We place a duty on our third parties to report any violation that is suspected or discovered, through and of the Available Resources listed below.

COMPLIANCE WITH APPLICABLE TAX LAWS

CME Group is committed to preventing the involvement of those acting on its behalf in the direct or indirect facilitation of tax evasion. CME Group has a zero tolerance policy for any third parties who indirectly or directly facilitate tax evasion, or fail to prevent the same. We place a duty on our third parties to report any incident of tax evasion that is suspected or discovered, through and of the Available Resources listed below.

LABOR AND HUMAN RIGHTS

At CME Group, we respect human rights and believe our colleagues are entitled to a safe and healthy work environment that is free from discrimination and harassment, threats or acts of violence or intimidation. At a minimum, all third parties representing CME Group must comply with all applicable laws and regulations related to human rights, labor rights, working conditions, health and safety and environment and obtain all legally required permits, licences and registrations which they must be able to demonstrate upon request.

Forced Labor

Employment must be freely chosen and voluntary. Involuntary labor includes the transportation, harbouring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. No third party may employ forced labor or engage in any form of human trafficking whether by force, fraud or coercion. All forms of involuntary servitude and slavery as well as any forced sex trafficking or the procurement of any commercial sex act are strictly prohibited by third parties.

All third parties must be able to verify the legal employment eligibility of all persons to work and not use any form of prison, indentured, forced, involuntary, bonded or slave labor.

Child Labor

Vendors shall not use or support the illegal use of child labor. Vendors shall comply with all applicable child labor laws and use only workers who meet the minimum legal age of employment for their locality.

RESPECT, INCLUSION AND NON-DISCRIMINATION

We expect workers of those working on our behalf to be treated with respect and dignity. All third parties are expected to comply, at a minimum, with all applicable laws regarding discrimination in hiring and employment practices.

ENVIRONMENTAL SUSTAINABILITY

CME Group recognizes the importance of reducing its carbon footprint and has conducted an inventory of our greenhouse gas emissions. Conducting and disclosing this inventory is a meaningful step in our efforts to evolve our internal sustainability initiatives. We will continue to report on these metrics each year and aim to make improvements where possible.

In addition to complying with applicable environmental laws, we encourage suppliers to adopt sustainability and environmental practices. CME Group expects its suppliers to demonstrate a clear understanding of the environmental risks, responsibilities, and impacts of the products and services they provide. We encourage suppliers to collaborate with us in supporting our efforts to reduce the impacts of climate change. We expect suppliers to provide us with information to support our reporting related to environmental sustainability and supply chain emissions.

CME Group continues to evolve and improve our sustainability efforts as described in our annual [ESG Reports](#).

SELF-REGULATORY ORGANIZATION AND OTHER REGULATORY OBLIGATIONS

As the operator of multiple self-regulatory organizations as well as other regulated businesses, CME Group has a heightened and proactive responsibility to protect market integrity and to ensure we meet all applicable regulatory obligations. These responsibilities include, but are not limited to, acting to proactively mitigate risks to prevent damage to the marketplace, protecting market participants and public interests and preventing fraud and manipulation and removing barriers to free and open markets. We expect the third parties we do business with to assist us in meeting these obligations, including reporting any actual or constructive notice of potential rule violations or violations of the regulations relating to the markets we own and operate to our [Market Regulation Department](#).

AVAILABLE RESOURCES AND RAISING CONCERNS

At CME Group, we rely on those working on our behalf to raise issues and concerns so that such matters can be effectively addressed. If you see something that raises a compliance or ethical question or concern, you have an obligation to report it. Timeliness of reporting is essential.

If you wish to report questionable behaviour or a possible violation of this Guide or another CME Group policy, you are encouraged to work with your primary CME Group contact in resolving your concern. You may also utilize the [CME Group Helpline](#). These reports and requests may be made anonymously, as permitted by local law, and will be treated as confidential to the extent possible. We do not retaliate against anyone who makes a report in good faith.

Any questions regarding this Guide should be directed to your CME Group contact or a member of CME Group management or Corporate Procurement.

OVERSIGHT AND REVIEW OF GUIDE

This Guide is subject to the oversight of the Global Corporate Compliance & Ethics Team. CME Group will periodically audit and monitor compliance with this Guide as necessary and appropriate. This Guide is subject to review on an as needed basis but at least every three (3) years.

PENALTIES AND CONSEQUENCES

Potential violations will be subject to investigation by the Company and/or its agents, and any failure to comply with this Guide may result in termination of services to CME Group.

Revision History for the Guide to Conducting Business for Third Parties of CME Group.

Version	Date	Revision	Owner(s)
9.0	May 2023	<ul style="list-style-type: none"> New sections on Due Diligence, Economic Crime and Compliance, Environmental Sustainability and Self-Regulatory Organization and other Regulatory Obligations 	Corporate Compliance
8.0	April 2022	<ul style="list-style-type: none"> Updates and clarifications made to sections below, and other minor administrative updates: Fair Competition and Antitrust, Trade Compliance, and Labor and Human Rights. 	Corporate Compliance
7.0	January 2021	<ul style="list-style-type: none"> Minor updates Added Respect, Inclusion and Non-Discrimination section Added an existing point from the Gifts and Entertainment Policy that CME Group colleagues may not accept gifts or entertainment from vendors or potential vendors when negotiations are occurring, exception for a nominal business meal. 	Corporate Compliance
6.0	November 2019	<ul style="list-style-type: none"> Clarifying changes. 	Corporate Compliance
5.0	December 2018	<ul style="list-style-type: none"> Added reference to the Confidentiality and Data Protection Policy 	Corporate Compliance
4.0	October 2017	<ul style="list-style-type: none"> Added section on Compliance with Applicable Tax Laws 	Corporate Compliance
3.0	September 2017	<ul style="list-style-type: none"> Added section on Data Protection 	Corporate Compliance
2.0	April 2017	<ul style="list-style-type: none"> Added Labor and Human Rights section 	Corporate Compliance
1.0	September 2016	<ul style="list-style-type: none"> Added clarifying language regarding gifts Update the Helpline to include India 	Corporate Compliance

Matrix of Approvals

Description of Required Approval	Date of Last Approval Relating to Current Version (Version 9.0)
Global Corporate Compliance & Ethics Team	March 08, 2023