

Guide to Conducting Business for Third Parties of CME Group

Policy Number: 0008

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CME Group	*LEADING WITH CONVICTION AND INTEGRITY*	
GUIDE TO CONDUCTING BUSINESS FOR THIRD PARTIES OF CME GROUP	**Policy Document No. and Version No.:**	**0008 13.0**
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PURPOSE AND STATEMENT OF GUIDE

CME Group Inc. is committed to firmly adhering to ethical business practices in dealing with its clients, vendors, regulators, business partners, shareholders and others. We call this our culture of compliance and ethics.

For our culture of compliance and ethics to work, every person who assists CME Group with our business must act ethically and ensure his or her actions are consistent with the law and relevant CME Group policies. This includes every individual, vendor, supplier, internal and external consultant engaged by CME Group (herein “third parties” or “you”). To do so, each third party must:

1. understand CME Group principles and the policies that we have put in place to help implement our principles; and

2. proactively escalate any problems or issues they encounter.

This Guide outlines CME Group’s fundamental standards for business conduct. It is intended for all third parties who work with or on behalf of CME Group, illustrating how our policies translate into expected behavior and what we require from you.

CME Group recognizes that many companies operate under their own code of conduct that may address topics covered in this Guide. Our expectation is not that third parties replace their code with this Guide, but rather that you ensure you act consistently with this Guide and actively address any CME Group-specific issues and requirements with your staff supporting CME Group. Additionally, each third party must meet the reporting expectations in this Guide. Compliance with this Guide will be considered in CME Group decisions regarding continuing to engage services of a third party.

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.

REPORTING OBLIGATIONS

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 or that may violate the principles of this Guide, you have an obligation to report it. Timeliness of reporting is essential. Suspected violations should be reported through one of our available reporting channels including:

- Your Corporate Procurement or business contact
- **Corporate Compliance**
- **Global Chief Compliance Officer**
- **CME Group Compliance & Ethics Helpline**
    - US and Canada 877.338.4545
    - Scan the QR code for the mobile version

NON-RETALIATION

CME Group has zero tolerance for retaliation against anyone who speaks up based on a reasonable belief. Retaliation means any kind of unfair treatment, whether subtle or overt.

DUE DILIGENCE

Where appropriate, CME Group conducts risk-based due diligence on third parties in order to assess any associated risks from the relationship with the third party and the specific engagement. CME Group expects third parties to provide complete and accurate information to facilitate these due diligence efforts.

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 responsibilities to CME Group. A conflict of interest arises when an individual or entity has a financial or personal relationship or other interest that could interfere with the obligation to act in the best interests of CME Group, or when outside business activities interfere with the ability to perform services to CME Group.

Any potential conflicts of interest must be disclosed as part of the engagement process for discussion with Corporate Procurement and the applicable business owner (in consultation with Corporate Compliance). To the extent a conflict of interest arises during the course of services, it must be promptly disclosed to the applicable 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, data, other intangible industrial and commercial property or other proprietary rights.

To the extent permitted by law, and where agreed as a condition of engagement to provide services to us, CME Group has the rights to all intellectual property created while providing services to us that relates to CME Group business; and/or results from your carrying out duties or services for CME Group; 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. No one should knowingly infringe upon those rights. Our duty to respect such rights applies to any business activities, 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.

Appropriate precautions must always be taken 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 agreed as a condition of service to CME Group, all 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** must be followed. Copies of other policies referenced therein should be provided to you in connection with your engagement by Corporate Procurement and are otherwise available on request.

PROTECTING AND PREVENTING THE MISUSE OF PERSONAL DATA

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.

USE OF ARTIFICIAL INTELLIGENCE

Unless otherwise explicitly permitted in a written agreement with CME Group, no proprietary data (including but not limited to any CME Group information, as defined in the **Confidentiality and Data Protection Policy**) provided by or generated for CME Group may be used to train, tune, or improve any artificial intelligence ("AI") models or technology,

including but not limited to generative AI models, machine learning algorithms, or automated processing tools.

In the event a third party uses AI in its day-to-day operations, the third party must ensure such technology is deployed within a secure, enterprise-grade environment that prevents the ingestion of CME's proprietary data (including but not limited to any CME Group Information, as defined in the **Confidentiality and Data Protection Policy**) into any training sets, and the third party maintains full responsibility for the accuracy and integrity of all AI-generated outputs, ensuring that a review process is consistently applied to mitigate risks associated with hallucinations, bias, or technical error.

The third party agrees to provide transparency regarding the logic, data inputs and security protocols of any AI systems used to complete CME Group business upon request. Failure to adhere to these restrictions, or the unauthorized use of AI tools, shall be considered a material breach of the agreement between the parties. In the event a third party uses AI systems in its day-to-day operations to complete CME Group business, such third party ensures that all deliverables comply with all applicable laws and meet the rigorous regulatory and security standards that CME Group is subject to.

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.

Third parties engaged by CME Group 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.

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

Documents, software, emails and other webpages could bring damaging computer viruses into CME Group's network. Third parties engaged by CME Group shall 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. Material from the Internet should not be downloaded or disseminated without the applicable consent of any copyright owner.

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

CME Group 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.
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> **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 or appearance of impropriety must be avoided.

Third parties engaged by CME Group for services should never make any facilitating payments. These payments, which are usually small in nature and made to lower-level governments or private sector employees, to secure or speed up the performance of a routing action, are illegal under the UK Bribery Act and other countries' laws.

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

Third parties engaged by CME Group should not provide gifts or entertainment in connection with CME Group business to any party unless specifically authorized to do so by CME Group in writing and in connection with the engagement.

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 with any of our available compliance resources.

CME Group colleagues may accept gifts and entertainment provided that they 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

In most jurisdictions where CME Group conducts its business, insider trading and other forms of market abuse are illegal.

Individuals who become aware of or have access to material, non-public information relating to CME Group, any other company, or any financial instrument as a result of their services to CME Group, may not buy or sell, directly or indirectly through a family member or other person or entity, CME Group,the other company's securities, or any other financial instrument, 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 any of the available reporting channels listed above.

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 any type of economic crime, including money laundering activities. Third parties shall not channel any funds to, or support, illegal activities (e.g., terrorism, tax evasion, fraud).

INTERNATIONAL TRADE AND SANCTIONS

CME Group is committed to complying with applicable economic sanctions laws and regulations. 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 any of the available reporting channels listed above.

FINANCIAL INTEGRITY AND TAX COMPLIANCE

CME Group prohibits all forms of fraud, including misappropriation of assets, financial statement falsification and tax evasion. CME Group is committed to preventing the involvement of those acting on its behalf in the direct or indirect facilitation of fraud or tax evasion. CME Group has a zero tolerance policy for any third parties who indirectly or directly facilitate financial crime, or fail to prevent the same. We place a duty on our third parties to report any incident of fraud or tax evasion that is suspected or discovered to **Corporate Compliance**.

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, harboring, 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

Third parties shall not use or support the illegal use of child labor. Third parties 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, NON-DISCRIMINATION AND ANTI-HARASSMENT

We are an inclusive employer, and we expect workers of those working on our behalf to be treated with respect and dignity. We also expect that our employees, workers and other contractors shall be protected from any harassment (including harassment of a sexual nature). Such behavior is unlawful and will not be tolerated by us. All third parties are expected to comply, at a minimum, with all applicable laws regarding discrimination and anti-harassment 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 and expect our suppliers to support our efforts and reporting.

CME Group continues to evolve our sustainability efforts as described in our **annual 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**.

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

Breaches of the CME Group culture of ethics and compliance, as set forth in this Guide, can have serious repercussions on many levels, including legal and regulatory consequences and damaging the CME Group's reputation. Potential violations will be subject to investigation by the CME Group and/or its agents, and any failure to comply with this Guide may result in termination of the engagement of third party services to CME Group, referral to regulatory authorities, and potential civil and criminal exposure.