

**CME GROUP INC.**  
**Policy Regarding Hiring Partners and Employees**  
**of the Independent Registered Public**  
**Accounting Firm**

The Audit Committee has adopted the following Policy regarding the hiring of any current or former partner or employee of the Company's Independent Registered Public Accounting Firm (the "**Auditor**") as an employee or as a consultant of CME Group Inc. or any of its subsidiaries (collectively, the "**Company**" or "**CME Group**"). This Policy is to (i) ensure that the Company's hiring of such individual does not impair the independence of the Company's Auditor, (ii) ensure compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices and (iii) avoid any potential conflict of interest either in fact or appearance regarding the Auditor's ability to exercise objective and impartial judgment on all issues encompassed within the audit engagement. This Policy is not meant to cover the engagement of the Auditor to provide services to the Company which is addressed in the Audit and Non-Audit Services Policy.

**Review and Approval Process for Current and Former Partners and Employees of the Auditor**

With respect to the potential hiring or engagement of any current or former (within the last two (2) years) partner or employee of the Auditor:

1. Human Resources shall notify the Chief Financial Officer, the Chief Accounting Officer, the Controller, the Corporate Secretary and the Assistant Corporate Secretary by email of the potential hire/engagement, including information regarding the position to be filled at CME Group and the candidate's affiliation and/or current or former positions at the Auditor.
2. The Chief Accounting Officer or in his/her absence either the Controller or the Chief Financial Officer is responsible for reviewing the proposed hiring/engagement to determine whether it is in compliance with this Policy. If it is determined that the proposed hiring/engagement is not in accordance with this Policy, he/she shall notify Human Resources that the particular individual may not be hired or engaged by CME Group. If the Chief Accounting Officer or in his/her absence either the Controller or the Chief Financial Officer believes that such hiring or engagement is permitted under this Policy, then he/she shall:
  - a. Consult the Audit Engagement Partner by email to confirm the absence of any independence issues/relationships between the candidate, the Auditor and the Company;
  - b. Notify the Chair of the Audit Committee by email of the potential hire/engagement following receipt of confirmation from the Audit Engagement Partner as to the absence of the existence of any independence issues/relationships; and
  - c. Respond to Human Resources via the original email to provide notification of the communication from the Audit Engagement Partner and management's determination as to whether a binding offer may be provided in accordance with this Policy.

The communication from the Audit Engagement Partner and the documentation of the foregoing reviews and notifications shall be maintained by Human Resources in the individual's file with a copy provided to the Office of the Secretary.

***No binding offers may be provided to any individual with an identified direct or indirect affiliation with the Auditor prior to complying with this Policy and the confirmation that no independence issues/relationships are in existence.***

### **Limitations on Hiring**

Notwithstanding the foregoing, the Company shall not:

1. Hire or engage any current or former member of the Company's audit team (including the engagement quality review partner and non-audit personnel such as tax professionals involved in the Auditor's review of the tax provision and accrual), or those who were consulted or were in the position to consult with the audit engagement team on technical or industry-specific issues, transactions or events until two (2) years following the termination of the individual's employment with the Auditor. This two-year cooling off period applies to any position for a ***Financial Reporting Oversight Role***<sup>1</sup> at the Company, including but not limited to the following roles that were in effect at the time this Policy was last reviewed:

- Chief Executive Officer
- Chief Financial Officer
- General Counsel
- Chief Audit Executive and Head of Global Assurance
- Managing Director, Corporate Tax
- Senior Director, Corporate Tax
- Controller
- Assistant Controller
- Chief Accounting Officer
- Senior Director, Compliance and Controls
- Director Corporate Accounting
- Manager Corporate Accounting
- Senior Director Financial Reporting
- Senior Director Global Accounting Operations
- Manager, Financial Reporting
- Lead Financial Reporting
- Lead Accountant
- Senior Accountant
- Executive Director Accounting Research & Operations
- Senior Director EMEA Accounting
- Director EMEA Accounting
- Member of the Board of Directors

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<sup>1</sup> The term "***Financial Reporting Oversight Role ("FROR")***" refers to an individual in a position to – or actually do – exercise influence over the contents of the company's financials or related information (such as MD&A), or over anyone who prepares them (e.g., oversight of preparers). An FROR includes an accounting role, board of directors and can also extend to positions at a subsidiary.

2. Hire or engage any former partner or principal of the audit team for a position with the Company into an **accounting role**<sup>2</sup> or a Financial Reporting Oversight Role unless such individual:
  - Does not influence the Auditor’s operations or financial policies;
  - Has no capital balances with the Auditor;
  - Has no financial arrangement with the Auditor;
  - Does not participate or appear to participate in, or be associated with the Auditor; and
  - Has elapsed the two-year cooling off period following the termination of the individual’s employment with the Auditor, if applicable.
3. Employ a close family member (i.e., the spouse, spousal equivalent, parent, dependent, nondependent child or sibling) of any **“covered person”**<sup>3</sup> in an accounting role or in a Financial Reporting Oversight Role. Human Resources shall notify the Chief Financial Officer, the Chief Accounting Officer, the Controller, the Corporate Secretary and the Assistant Corporate Secretary to the extent it becomes aware through the application process of any familial relationship between a candidate and a covered person to ensure compliance with this Policy.

#### **Promotion of Former Partner or Employee of the Auditor**

No former partner or employee of the Auditor may be promoted to an FROR position until two (2) years following the termination of the individual’s employment with the Auditor.

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<sup>2</sup> Someone is in an **“accounting role”** when they are in a position to – or actually do – exercise more than minimal influence over the contents of the accounting records or anyone who prepares them.

<sup>3</sup> A **“covered person”** means:

1. all partners, principals and employees participating in an audit, review or attestation engagement (including non-audit personnel such as tax professionals involved in the review of the tax provision and accrual) with respect to the Company or any of its subsidiaries, including audit partners and all persons who consult with others on the audit engagement team during the audit, review or attestation engagement regarding technical or industry-specific issues, transactions or events;
2. all persons who
  - a. supervise or have direct management responsibility for the audit, including all successively senior levels through the accounting firm’s chief executive,
  - b. evaluate the performance or recommend the compensation of the audit engagement partner, or
  - c. provide quality control or other oversight of the audit;
3. any other partner, principal, executive director or managerial employee who has provided 10 or more hours of non-audit services during a particular fiscal year; or
4. any other partner or principal located in the office in which the lead audit partner is located or any other Ernst & Young LLP (“EY”) employee designated as a covered person by EY.

**Signing of Company Filings by Former Partners or Employee of the Auditor**

No former partner or employee of the Auditor may sign a Company's filing for two (2) years following employment with the Auditor.

**Reporting to the Audit Committee**

On an annual basis, the Audit Committee shall receive a written report on the profile of any persons hired during the preceding year from the Auditor in accordance with this Policy.

Revised December 9, 2025