



Australian Modern Slavery Statement

For year ending 2024

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1. Intro

This modern slavery statement has been prepared as a joint statement on behalf of:

- Creditex Brokerage LLP – a limited liability partnership registered in the UK with an Australian Market Licence (ARBN 134 638 734);
- ICE Endex Markets B.V. – an energy and environmental derivatives exchange located in the Netherlands with an Australian Market Licence (ARBN 654 146 577);
- ICE Futures U.S., Inc. – a commodity futures exchange located in the US with an Australian Market Licence (ARBN 618 239 964); and
- ICE Futures Europe – a commodity futures exchange located in the UK with an Australian Market licence (ARBN 128 341 293).

For the purposes of this statement, ICE refers to the broader group of companies of Intercontinental Exchange, Inc. ("ICE"), including the reporting entities named above. The expressions 'we', 'us', 'our' are used where a general reference is made to this group.

This is ICE's modern slavery statement under Australian law (the statement) and sets out information required by the *Modern Slavery Act 2018* (Cth) (the Act), in accordance with section 13 of the Act. The statement describes the risks of modern slavery that ICE has identified for our reporting entities and actions we have taken to address those risks during the reporting period 1 January 2024 – 30 December 2024 (reporting period).

Our approach

ICE is committed to working to prevent modern slavery and human trafficking in our supply chains in all parts of our business. The ICE Modern Slavery Statement reflects ICE's commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls that aim to prevent slavery and human trafficking from taking place in our supply chains. ICE is committed to maintaining systems and processes that protect its employees and are designed to avoid issues that could be perceived as human rights violations.

2. Our structure, operations and supply chains

2.1 Structure

ICE is a publicly listed company incorporated in the United States, which comprises a number of wholly owned subsidiary companies including each of the ICE reporting entities listed above. We have significant operations located in the U.S., UK, and India, with smaller offices located throughout the world.

2.2 Employees

As of December 31, 2024, we had a total of 12,920 employees. In the U.S., we had a total of 7,747 employees. Outside of the U.S., we had a total of 5,173 employees, including 3,394 in India, 789 in the U.K. and 399 in Europe.

The vast majority of our workforce are in professional, office-based roles performing duties such as legal, compliance, risk, IT, human resources, sales, product development, accounting and similar. We do not manufacture goods; our products are primarily (financial) services based and delivered digitally.

For more information about our corporate structure, please refer to our [2024 Annual Report](#).

2.3 Operations

ICE is a leading global provider of technology and data to a broad range of customers including financial institutions, corporations and government entities. Our products, which span major financial asset classes including derivatives, equities, fixed income and U.S. residential mortgages, provide our customers with access to tools that are designed to increase asset class transparency and workflow efficiency.

- **Exchanges** - We operate regulated marketplace technology for the listing, trading and clearing of a range of derivatives contracts and financial securities as well as data and connectivity services related to those venues.
- **Fixed Income and Data Services** - We provide fixed income pricing, reference data, benchmarks, indices, analytics and execution services as well as global credit default swaps, or CDS, clearing and multi-asset class data delivery technology.
- **Mortgage technology** - We provide a technology platform that offers customers digital workflow tools that aim to address inefficiencies and mitigate risks that exist in the U.S. residential mortgage market life cycle, from application through closing, servicing and the secondary market.

Reporting entities

- **Creditex Brokerage LLP** - Creditex Brokerage LLP (CBL) primarily provides electronic trade execution services to financial institutions and investment firms in the UK, certain European countries, the US, emerging markets, and the Asia Pacific region operating in the credit derivatives and fixed income markets. CBL also acts as an arranging firm in connection with auctions run by its affiliate, ICE Benchmark Administration Limited, in relation to commodities.
- **ICE Endex Markets B.V.** - ICE Endex provides liquid European gas, emissions and power markets that enable energy firms, EU ETS compliance entities and financial participants to effectively manage price risk. ICE Endex offers direct market access and a regulated futures and options platform.
- **ICE Futures U.S.** - ICE Futures U.S. is registered as a designated contract market pursuant to Sections 5 and 6(a) of the U.S. Commodity Exchange Act, as amended, and is supervised by the U.S. Commodity Futures Trading Commission. Its trading and risk management solutions include a range of futures and options on futures contracts including benchmarks in globally traded soft commodities, North American natural gas and power, equity indexes and FX.
- **ICE Futures Europe** - ICE Futures Europe is a Recognised Investment Exchange and Recognised Auction Platform in the UK and is supervised by the Financial Conduct Authority with oversight by the U.S. Commodity Futures Trading Commission for linked contracts. ICE Futures Europe is also registered under the Foreign Board of Trade requirements and is also a registered Benchmark Administrator under the UK Benchmarks regulation.

ICE does not engage in external financing activities or financial investing activities, except as ancillary aspects of the operations outlined above.

2.3 Supply chain

Our suppliers are predominantly located in the United States, based on spend, with lesser spend taking place in the locations where we have offices.

Because our business is primarily service-oriented and office-based, our supply chain is mainly comprised of:

- IT suppliers
- data suppliers
- online services
- legal services
- hosting service and software
- data processors and centres
- software and hardware ventures
- banks
- local and regional utility providers
- telecommunications companies
- internal audit services
- accounting services
- tax services
- facilities management
- cleaning
- office services
- other consultants

3. Modern slavery risks in operations, supply chains and trading platforms

3.1 Modern slavery risks in our operations

ICE may be exposed to modern slavery risks in its operations through its employee relationships. However, it is our view that ICE operates within an industry where the risk of modern slavery is low, based on the nature of our products and services.

Mitigating factors that may result in our workforce being less vulnerable to modern slavery risks include:

- the office-based environment that ICE entities operate in;
- the focus on higher-skilled activities related to financial services, technology and data that our business requires;
- our systems for managing human resources, visas and working rights, and payroll matters; and
- our office locations in leading financial services centres and a number of lower risk regions.

3.2 Modern slavery risks in our supply chain

Modern slavery risks to ICE could include supplier relationships, including outsourced cleaning or facilities management. ICE maintains a robust vendor assessment process and conducts annual modern slavery risk reviews both detailed further below.

3.3 Modern slavery risks in our trading platforms

Given it is part of ICE's business to provide platforms for the purposes of trading commodities, financial products and other assets, and technological solutions to facilitate markets in those areas, there is a potential risk that we may be linked to modern slavery through these platforms and solutions. As we do

not have control of the underlying commodities, financial products and other assets traded, we have limited ability to influence the modern slavery risks arising in this context.

4. Actions taken to assess and address modern slavery risks

ICE has taken risk-based actions to assess and address modern slavery risks within our operations and supply chain including the measures outlined here.

4.1 Policies and procedures

ICE has various policies and procedures in place to promote human rights and reduce the risks associated with modern slavery in our operations and supply chains.

Code of Conduct

Our Global Code of Business Conduct (“the Code”) reflects the rules and principles by which we operate on a global basis. The Code is framed around ICE’s core values: collaboration, problem solving, communication, integrity & professionalism and leadership.

The Code, which includes reference to human rights and modern slavery, is approved by the Board’s Nominating and Corporate Governance Committee and is reviewed regularly and assessed for effectiveness. The Code is available in 13 languages based on ICE’s global footprint.

The Code applies to all ICE employees and contractors and encourages them to come forward with questions, concerns and reports of actual or suspected misconduct with the confidence that ICE’s commitment to non-retaliation is firm. We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate action.

[View the Code](#)

4.2 Training

Our employees play an important role in helping us identify and respond to human rights issues by identifying and reporting potential violations. As such, we consider it important that employees have a good understanding of the identification, reporting and mitigation of human rights and modern slavery related issues.

- All employees (full and part time) globally, as well as contractors, are trained, tested and must attest that they have read and understand the Code upon hire and annually thereafter.
- Additionally, all employees and contractors are trained upon hire and annually on an ongoing basis on our anti-harassment policies.
- Training is procured from third-party sources with expertise in global regulations and bespoke adjustments are made to address ICE-specific requirements.
- Each training is reviewed and updated annually.
- Test scores are assessed to ensure understanding.

4.3 Human resources management

ICE has a comprehensive human resources management system, including identity and integrity checks, working rights checks, non-discrimination, equal opportunity and non-harassment, and payroll and payment systems.

4.4 Raising grievances and seeking remediation

Complaints or concerns related to ICE compliance, auditing or internal controls (including any perceived modern slavery risks) can be submitted anonymously and confidentially, or with full disclosure. Our employees around the world have access to a dedicated hotline which can be located on ICE's internal website and is part of ICE's Global Reporting and Anti-Fraud Policy. For external parties wishing to access the hotline, they can refer to the Code.

- Inquiries can be made anonymously subject to the laws of the country in which the employee is based.
- Every inquiry is reported to the chair of the ICE Audit Committee at the same time it is reported to management.
- Every inquiry is fully investigated and reported to the ICE Audit Committee and actions are taken as appropriate.

4.5 Supply chain due diligence and engagement

As part of ICE's initiative to identify and mitigate relevant risks in its supply chains, the ICE Third Party Risk Management Policy framework comprises two main elements: (i) due diligence and (ii) risk assessment. These procedures include but are not limited to:

- Due Diligence and Initial Risk Assessment

The Third Party Risk Management Office (TPRM) performs an initial qualification of the supplier to generate the relevant risk assessments (including compliance with applicable law which includes modern slavery legislation). The depth of the assessment is driven by the criticality of the service, scope of engagement, as well as the initial risk qualification. Reviews entail inquiry into the legal, regulatory and reputational public and non-public records. Each supplier is evaluated using the third party rating scorecard.

- Risk assessment

Each supplier is evaluated and TPRM is responsible for evaluating suppliers based on a defined criteria and assigning suppliers to an appropriate risk class. Risk ratings are reviewed when a material change in the supplier relationship is identified or if the supplier's ability to provide services to ICE is impacted by an external or internal event. The TPRM updates the data in the TPRM System of Records, and the recalculation of the tier is automatically generated. If a recalculation results in the change of a risk tier, a communication is sent to the business owner and respective risk partners notifying them of the change in frequency with which TPRM assess the supplier relationship.

The TPRM and business units will periodically consider and review suppliers in the highest risk category. This takes into account various considerations, including but not limited to changes with the supplier, industry-wide changes (regulatory, legal, or other industry wide change) or changes within ICE TPRM (for example, information security). While these higher risk suppliers are subject to greater scrutiny there is a possibility that modern slavery deeper in our supply chains will not be identified

4.6 Modern slavery risk reviews

With respect to our supply chains, ICE conducts annual modern slavery risk reviews, whereby certain suppliers (that make up the top 75% of spend in respect of the relevant ICE entity) and specific identified third parties (as determined by the relevant ICE entity) are evaluated for potential modern slavery risk

exposure, taking into account the guidance published by Freedom House in the UK¹ (and other sources) on tackling modern slavery in supply chains.

These reviews seek to categorize relevant entities as low, moderate, or high risk in terms of their likely involvement in and/or connection to modern slavery.

Any vendors or relevant third parties that receive a rating of medium or higher in the annual modern slavery risk review will also receive a mid-year review aimed at identifying if any further information about the vendor or relevant third party concerning modern slavery has been made available since the previous review.

- Where possible, when entering into a contract with a supplier, we use our standard terms and conditions which require suppliers to adhere to applicable laws, which will include relevant anti-slavery legislation.
- ICE sends its Modern Slavery Statement to all suppliers that make up the top 75% of spending, as well as relevant third parties that have been identified.

4.7 Sanctions screening

ICE seeks to directly identify, mitigate and manage the risks it might reasonably face in providing products and services. This includes consideration of money laundering and terrorist financing risk exposures which, given the interrelationship between modern slavery and money laundering, allows ICE to draw on analysis of ICE's business relationships, the methods used to deliver products and services, the foreign jurisdictions in which ICE deals and suspicious matter reporting.

5. Measuring the effectiveness of actions taken

ICE continues to develop appropriate frameworks to ensure we are adequately assessing the effectiveness of our programs including an ongoing review of our processes and controls. Our current approach to assessing effectiveness of our program includes:

- Results of annual modern slavery risk reviews
- Vendor assessments
- The Code training completion rates
- Tracking modern slavery related grievances reported to the hotline

6. Consultation

This Modern Slavery Act Statement has been prepared in consultation with each reporting entity covered by the statement, which occurred through overview by relevant central functional team.

¹ Freedom House's "Freedom in the World Report", available here: https://freedomhouse.org/sites/default/files/2025-02/FITW_World_2025_Feb.2025.pdf; the US Department of State's Trafficking in Person's Report 2024, available here: <https://www.state.gov/reports/2024-trafficking-in-persons-report/> and the US Department of Labour List of Goods and Services, available here: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>.

7. Approval

This Statement has been approved by the Board of Directors of Intercontinental Exchange Inc. on September 18, 2025.

Signed by:

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by the letters 'EFF'.

Jeffrey C. Sprecher

Chair and Chief Executive Officer

I have the authority to bind Intercontinental Exchange Inc., the ultimate parent of the reporting entities.