



Modern Slavery Act 2015

Slavery and Human trafficking statement (“Statement”) as required under s54 of the Modern Slavery Act 2015 (“the Act”) for the financial year ended 31 December 2015 (“Financial Year”). This statement applies to all companies within Intercontinental Exchange, Inc. (“ICE”) that are required to have a modern slavery statement in accordance with the Act (“the Relevant Companies”).

Introduction

Intercontinental Exchange (NYSE:ICE) is a Fortune 500 company that operates a leading network of global futures, equity and equity options exchanges, as well as global clearing and data services across financial and commodity markets. Intercontinental Exchange brings markets, capital and companies together to drive growth and enable risk management as a leading operator of exchanges, clearing houses and data solutions.

Our regulated, liquid and transparent markets span 9 asset classes and comprise 12 exchanges and 6 clearing houses in Europe, North America and Asia, within major assets classes: energy, interest rates, agriculture, metals, FX, credit and equity derivatives, cash equities and equity options.

ICE is a global leader in market data, ICE Data Services offers information solutions across global markets and virtually all asset classes with exchange data, evaluations and indices, reference data, analytics and connectivity.

ICE also offers Global benchmark contracts ranging from interest rates to crude oil and soft commodities, including home to ~50% of the world’s traded crude oil and refined oil futures volume.

ICE has six clearing houses driving strong risk management practices and supporting reduction in systemic risk. ICE is a global leader in capital raising through the New York Stock Exchange and a leader in equity, ETF and equity options markets by traded volume globally with a comprehensive and growing portfolio of traded and cleared credit default swap (CDS) instruments.

Our policies and controls

ICE and the Relevant Companies are committed to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business. The ICE Modern Slavery Policy reflects this commitment to acting ethically and with integrity in all ICE business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

ICE is committed to maintaining systems and processes that protect its employees and avoid any issue that can be perceived as a human rights violation. ICE implements policies related to non-discrimination, equal opportunity and non-harassment. ICE believes that its approach to professionalism, respect and integrity has served ICE well, and continues to ensure that the rights of employees and applicants are protected around the world. ICE complies with all applicable laws and regulations on forced or child labor, and the rights of employees to organize a union. The ICE Global



Code of Business Conduct is designed to ensure compliance with our core values that focus on professionalism and integrity.

Assessment of Modern Slavery Risk

It is ICE's view that it operates within an industry where the risk of modern slavery is low, based on the nature of the relevant products and services as well as the location of significant operations. Notwithstanding this, ICE unequivocally supports the drive to eradicate modern slavery and fully supports the requirements of the Act.

Relevant Companies are undertaking a broad "Modern Slavery Risk" review of their current vendor base, focusing on the vendors that make up the top 75% of spend. The Relevant Companies use the ICE Vendor Management Policy, in place since October 2015 to categorise vendors, based on a defined criteria, into High, Medium or Low risk categories.

As part of the Modern Slavery Risk review these vendors are being evaluated for Modern Slavery risk using the guidance published by the Walk Free Foundation¹ on tackling modern slavery in supply chains. This review will categorize relevant vendors as low, moderate or high risk in terms of their likely involvement in and/or connection to modern slavery. The Relevant Companies are committed to sending out the Modern Slavery Statement and Policy to all Relevant Company vendors that make up the top 75% of spend.

Vendor Due Diligence processes

As part of ICE's initiative to identify and mitigate relevant risks the ICE Vendor Management Policy framework comprises three main elements: (i) Due Diligence, (ii) Risk Assessment, and (iii) Performance Management and Oversight.

These procedures include but are not limited to:

1. Due Diligence and Initial Risk Assessment.

All vendors must complete a vendor profile. The Vendor Management Office ("VMO") performs an initial qualification of the vendor to generate the relevant risk assessments (including but not limited to factors such as Info-sec, HR, Financial, BCP, physical security and compliance with applicable law including in relation to modern slavery). The depth of the assessments is driven by the criticality, scope of engagement as well as the initial risk qualification.

Reviews entail inquiry into legal, regulatory and reputational public and non-public records. Each vendor is evaluated using the vendor rating scorecard as defined within the Vendor Management System ("VMS").

¹ "Tackling Modern Slavery in Supply Chains" A Guide 1.0, available here: <https://business.walkfreefoundation.org/>

2. Risk Assessment

Each vendor will be evaluated and VMO is responsible for evaluating vendors based on a defined criteria and assigning vendors to an appropriate risk class. Risk ratings are reviewed when a material change in the vendor relationship is identified or if the vendor's ability to provide services to ICE is impacted by an external or internal event. The VMO updates the data in the VMS and a 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 VMO assesses the vendor relationship.

The VMO and business units will periodically consider and review vendors in the highest risk category no less than annually. This takes into account various considerations, including but not limited to changes with the vendor, industry-wide changes (regulatory, legal, or other industry wide change or changes within ICE VMO (for example information security, BCP, KPI changes).

3. Performance Management and Oversight

ICE Vendors are subject to evaluations by VMO and may be required to provide performance metrics in order to continue their partnership with ICE. The risk and partnership classification of the vendor will dictate the cyclical frequency for each vendor performance evaluation.

Complaint Reporting Procedures

Complaints or concerns related to ICE accounting, auditing, internal controls or financial reporting can be submitted anonymously and confidentially, or with full disclosure. Our employees around the world have access to a hotline that can be easily found on the company'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 Global Code of Business Conduct policy.

Vendor adherence to our values

ICE has zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and vendors comply with our values, we ensure when entering into a contract with a vendor, our standard terms and conditions require vendors to adhere to all applicable laws, which will include relevant anti-slavery legislation.