

**CBOE GLOBAL MARKETS, INC. AND SUBSIDIARIES  
CODE OF BUSINESS CONDUCT AND ETHICS**

**Adopted February 10, 2022**

**Purpose**

This Code of Business Conduct and Ethics (the “Code”) has been adopted and is overseen by the Board of Directors (the “Board”) of Cboe Global Markets, Inc. (the “Company”) in order to promote honest, legal and ethical conduct in all of our business endeavors and transactions. Although important for many reasons, the integrity that is promoted and encouraged by this Code is critical to our core business in that it helps to ensure that our markets remain transparent and attractive to our customers. As such, all directors, officers and associates of the Company and its subsidiaries (collectively, the “Companies”) are responsible for and expected to conduct themselves in compliance with this Code and with the highest level of integrity.

This Code applies to all directors, board observers, Advisory Board members, officers and associates of the Companies. In addition, this Code applies to our part-time and temporary staff, interns and volunteers. Consultants, contractors and others who work on behalf of the Companies are expected to conduct themselves in a manner that is consistent with the principles articulated in this Code. Responsibility for the Company’s business ethics rests with all of us. Please remember that it is your responsibility to fulfill your obligations under this Code and that the obligations described in the Code apply to you whether or not the obligations are imposed by applicable law. In addition, it is your responsibility to promptly report potential violations of the Code by you or others to appropriate persons on our staff. All associates are trained annually on this Code.

**Conflicts of Interest**

Directors, officers and associates of the Companies and other persons subject to this Code have an obligation to make business decisions that are in the best interest of the Companies and the Company’s stockholders, and that are not influenced by their own personal or business self-interest. In this regard, you are always expected to act on behalf of and in the interest of the Companies and the Company’s stockholders and not to favor any third party because of any possible direct or indirect personal gain, and otherwise avoid any conflict of interest or the appearance of any conflict of interest. A conflict of interest occurs when a personal interest interferes in any way, or even appears to interfere, with the interests of the Companies. A conflict of interest also arises if you directly or indirectly receive personal benefits that are improper or unethical as a result of your relationship with the Companies.

A director, board observer or Advisory Board member may be a Trading Permit Holder, Trading Privilege Holder or member, as applicable, of a Company subsidiary, a director, officer or owner of a Trading Permit Holder, Trading Privilege Holder or member, as applicable, of a Company subsidiary and/or a customer of a Company subsidiary without creating a conflict of interest or the appearance of a conflict of interest.

In the event that you become aware of circumstances involving, or have questions about whether circumstances involve, a conflict of interest or the appearance of a conflict of interest, you must promptly disclose such circumstances to the Company’s General Counsel. In the event you are a director, and the circumstances involve you, another director, or a senior executive officer of

the Companies, you may, in lieu of disclosing such circumstances to the Company's General Counsel, disclose such circumstances to the Company's Chairman of the Board or the chairperson of the Company's Nominating and Governance Committee. In addition, if you are a director and you initiate litigation or arbitration against a Trading Permit Holder, Trading Privilege Holder or member, as applicable, or customer of a Company subsidiary or become aware of litigation or arbitration initiated against a Trading Permit Holder, Trading Privilege Holder or member, as applicable, or customer of a Company subsidiary by an entity with which you are affiliated, you must promptly disclose that litigation or arbitration to either the Company's General Counsel, the Company's Chairman of the Board or the chairperson of the Company's Nominating and Governance Committee.

### **Corporate Opportunities**

Directors, officers and associates of the Companies and other persons subject to this Code are prohibited from using for their own benefit opportunities that are discovered through the use of the property, information or position of or with the Companies without the express consent of the Board. In this regard, you may not use corporate property, information, or position for improper personal gain, and may not compete with the Companies, directly or indirectly, without the express consent of the Board. You owe a duty to us to advance the Companies' legitimate interests when the opportunity to do so arises.

### **Confidentiality of Information**

In order for the Companies to conduct their business, it is necessary and desirable for directors, officers and associates and other persons subject to this Code to have access to information that must be kept confidential. You have an obligation to safeguard confidential information, whether generated internally or acquired from others, and to use it only in the performance of your duties for the Companies. This obligation survives the termination of your relationship with the Companies. You should presume that any information received about, or developed by, the Companies, including information about the Companies' respective customers, Trading Permit Holders, Trading Privilege Holders, members, business contacts and business plans, is confidential and should not be disclosed, except when disclosure is authorized or legally required, or such information is already in the public domain. Further, the Companies will strive to comply with the laws that govern the collection, use, and processing of personal data, including the European Union ("EU") General Data Protection Regulation ("GDPR"). GDPR obligations provide data subjects (customers, associates, and vendors) additional rights to the personal data the Companies process and control. You are encouraged to report any concerns that personal data may be compromised or not protected properly to your manager and/or supervisor, department head or division head.

### **Fair Dealing**

The Companies strive to uphold the highest standards of ethical and legal conduct and integrity within the workplace and in all business relationships, transactions, and activities. The Companies' commitment to maintain these standards is a critical component in sustaining and protecting the Companies' industry-wide reputation for excellence, professionalism and integrity.

The personal and professional conduct of every director, officer and associate of the Companies is very important to the continued success of the Companies. The conduct of each director, officer and associate of the Companies reflects directly on the Companies, and as a result,

all directors, officers and associates of the Companies are held responsible for consistently maintaining and demonstrating the highest standards of ethical conduct and behavior. You are expected to accept certain responsibilities and adhere to acceptable business practices and principles in matters of both professional and personal conduct.

This conduct and behavior not only involves demonstrating sincere respect for the rights and feelings of other individuals, but also requires that directors, officers and associates of the Companies refrain from engaging in any behavior which might be harmful to themselves, co-workers, members, and/or to the Companies, or which may be deemed inappropriate or unprofessional. You are responsible for maintaining constructive professional relationships with others and for taking the initiative to contribute positively to the products and services offered by the Companies. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.

### **Protection and Proper Use of Company Assets**

You should endeavor to protect our assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. Any suspected significant cybersecurity incident, data breach or compromise of information security or incidence of fraud or theft should be immediately reported to appropriate persons on our staff for investigation. Occasional personal use of company systems is permitted, but the Companies' electronic information systems should be considered non-confidential and accessible to monitoring. All associates receive regular computer-based training on our information security policy on at least an annual basis and are required to acknowledge they have completed the training in its entirety.

Your obligation to protect our assets extends to our proprietary information, including intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate this Code and could also be illegal and result in civil or even criminal penalties. An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (A) is made (i) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

### **Compliance with Laws**

Obedying the law, both in letter and in spirit, is the foundation on which our ethical standards are built. You must respect and obey the laws of the cities, states, and countries in which we operate. Although you are not expected to know the details of all of these laws, it is important for you to know enough to be able to determine when to seek advice from the Company's Legal Division.

Our compliance with this Code is generally facilitated by monitoring existing contractual relationships, reporting irregularities, investigating incidents, and taking corrective actions.

We strive to comply with all laws, with a particular focus on the following:

### ***Antitrust Laws***

The Companies are committed to complying with the antitrust laws and similar laws governing competition in the countries in which they do business. Directors, officers and associates of the Companies are responsible for ensuring that our business is conducted in accordance with these laws. Failure to comply with these laws can result in severe consequences for you and the Companies, regardless of whether you intended to violate these laws. In addition, these laws may differ from country to country. Any questions concerning these laws should be immediately raised with the Company's Antitrust Compliance Officer.

### ***Anti-Corruption and Anti-Bribery Laws***

The Companies are committed to complying with applicable anti-corruption and anti-bribery laws and regulations, which generally prohibit giving, offering, promising to pay, or authorizing the payment of, directly or indirectly, money or anything of value to any government official to win or retain business or favorable treatment. In addition, you may not pay, loan or otherwise disburse any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind as bribes, facilitation payments, "kickbacks," or other payments designed to influence or compromise the conduct of the recipient; and no person covered under this Code shall accept any funds or other assets for assistance in obtaining business or for securing special concessions from the Companies. Any questions concerning these obligations should be immediately raised with the Company's Legal Division. All associates receive computer-based training on our anti-corruption and anti-bribery policy on an annual basis and are required to acknowledge understanding of its contents.

More detailed policies concerning anti-corruption and anti-bribery can be found in our Global Anti-Corruption Policy.

### ***Insider Trading***

It is both illegal and against our policy for any person subject to this Code to trade in securities of the Company while in possession of material, non-public information concerning the Company and for one trading day after the date such material information has been publicly released unless such transaction occurs pursuant to a properly established 10b5-1 Plan. In addition, no person may trade the securities of other entities to the extent they are in possession of any material, non-public information relating to those securities.

More detailed policies concerning investments in securities can be found in our Insider Trading Policy.

### ***Sanctions and Trade-Control Laws***

The Companies are committed to complying with all applicable trade-related laws and regulations, including those related to economic sanctions, export control and boycotts. Sanctions laws generally impose economic and trade sanctions against particular persons, entities, countries, and territories and are generally identified on sanctions lists maintained by various jurisdictions. The persons, entities, countries and territories that are subject to sanctions may change from time to time and may vary based on the country in which the Companies operate. Any questions concerning the scope of these obligations or the persons, entities, countries, and territories that are

subject to applicable laws and regulations should be immediately raised with the Company's Legal Division or Compliance Department.

More detailed policies concerning sanctions and trade-control laws can be found in our Global Trade Controls Policy.

### **Anti-Money Laundering**

The Companies are committed to conducting business with reputable counterparties involved in legitimate business activities, with funds derived from legitimate sources. It is against our policy for any person subject to this Code to engage in illegal money laundering and all persons subject to this Code are expected to take reasonable steps to prevent and detect unacceptable and suspicious forms of payment.

### **Political Involvement**

We are committed to disclosing political donations and/or lobbying expenditures per Federal Election Commission ("FEC") requirements.

We encourage personal participation by the Companies' directors, officers and associates in the political process in a manner consistent with all relevant laws and Company guidelines. Directors, officers, and associates of the Companies may not use Cboe resources or seek reimbursement for personal political activities. Only authorized individuals may engage in lobbying activities on behalf of the Company.

### **Business Records**

The Companies' business records must be created, maintained and reported to management and third parties with integrity and accuracy. All of the Companies' directors, officers and associates are responsible for the integrity and accuracy of the Company's records. Applicable laws require the Companies to create and maintain records that serve as an accurate representation of the Companies' business. These business records, including in many cases electronic mail, must be retained according to the applicable laws and policies relating to the retention of records. For example, any records that are potentially relevant to a breach of law, or any litigation or arbitration, or any pending, threatened or reasonably foreseeable government investigation or proceeding must not be destroyed. Any questions regarding records retention should be directed to Company's General Counsel.

### **Reporting Illegal or Unethical Behavior**

Failure to maintain the highest standards of ethical business conduct can result in serious potential consequences for the director, officer or associate as well as the Companies. As a result, you play a critical role in preventing unethical, illegal, or unsafe actions that could result in financial losses, reduced morale and/or create legal liability for the Companies and their directors, officers and associates. In addition to workplace harassment issues, such activities could include, but are not limited to, conflicts of interest, impermissible gifts/bribery, breach of confidentiality, substance abuse, threats to personal safety, theft, inappropriate removal of the Companies' documents and/or property, and inappropriate or unauthorized use of the Companies' electronic information systems or systems equipment. Such activities could also include, but are not limited to, non-compliance with applicable governmental rules and regulations and not providing

complete, fair, accurate, timely and understandable disclosure in periodic mandated filings for the Companies.

As communication is the key to identifying problems and implementing solutions within the workplace, the Companies' directors, officers and associates should identify and report issues or activities that are illegal or unethical, or that may negatively impact the business of the Companies or may be harmful to themselves and/or to others, in order to sustain the Companies' reputation for unsurpassed integrity, professionalism and excellence. In this regard the most effective way for directors to address issues or concerns is to speak with the Company's Chairman of the Board or the chair of the Company's Nominating and Governance Committee (the "Nominating and Governance Committee"). The most effective way for officers and associates at the Companies to address issues or concerns is to speak with their manager and/or supervisor, department head or division head. Additionally, officers and associates may always speak with a representative from the Company's Human Resources Department.

In addition, should an officer or associate of the Companies not feel comfortable addressing concerns utilizing traditional communication channels, an anonymous confidential resource is also available through NAVEX Global, Inc. ("NAVEX"), an independent company. NAVEX operates a telephone hotline that is available twenty-four (24) hours a day, seven (7) days a week as well as a web resource to submit a confidential and anonymous report. The toll-free number and web resource to reach NAVEX is available to officers and associates of the Company on the Company's intranet. When an individual elects to utilize this reporting service, the individual is not required to give their name and the call is not recorded. Information provided by the individual is conveyed by NAVEX in a report to appropriate representatives of the Companies for further investigation. The individual is given a reference number by NAVEX to inquire at a future date to respond to any additional questions and/or to learn if the concern has been addressed.

Finally, the Company has established a Complaints Working Group ("CWG"), which is comprised of a cross-section of representatives from each of the Company's control functions. The CWG strikes to keep these control functions timely notified, as appropriate, of the existence, and subsequent status, of complaints, as well as other non-routine concerns or allegations of wrongdoing regarding the Companies and/or its associates.

***Importantly, the Companies will not tolerate retaliation against any person who raises an ethics or compliance issue in good faith. Individuals who raise concerns or who help to resolve reported matters are protected against retaliation.***

### **Cooperating with Investigations and Legal Proceedings**

You are required to cooperate fully and provide the Company with truthful, accurate and complete information in connection with any internal investigation, litigation, or government, regulatory or administrative inquiry, review or examination (collectively, "Legal or Administrative Proceeding") involving the Company. To ensure that the Company satisfies any obligations it might have to cooperate with government authorities, if you are contacted by any government authority (U.S. or otherwise) with regard to a Legal or Administrative Proceeding involving the Company, unless directed otherwise by the government authority, you must immediately notify

the Company's General Counsel who will determine what information needs to be provided in each case.

### **Enforcement of this Code**

The Nominating and Governance Committee shall determine appropriate actions to be taken in the event of, or to protect against, violations of this Code by directors and senior executive officers and may determine appropriate actions to be taken in the event of, or to protect against, violations of this Code by any other persons subject to this Code. Such actions shall be reasonably designed to deter or prevent wrongdoing and to promote accountability for adherence to the Code. In determining what action is appropriate in a particular case, all relevant information, including the nature and severity of the violation or potential violation, whether the violation or potential violation appears intentional or inadvertent, and whether the individual in question had been advised prior to the violation or potential violation as to the proper course of action, shall be taken into account. Violations of this Code by officers and associates may result in disciplinary action, up to and including the termination of employment. In the case of director conflicts arising in connection with a matter being considered by the Board, the affected director may be asked to abstain from participating in the consideration and/or approval of the matter.

Without limiting the foregoing, in the event that you become aware of, and have disclosed to the Company's General Counsel, Chairman of the Board or Chairman of the Nominating and Governance Committee, circumstances that involve or could potentially involve a conflict of interest or the appearance of a conflict of interest, as provided above, the Company's General Counsel, Chairman of the Board or Chairman of the Nominating or Governance Committee may establish limitations or requirements reasonably designed to permit the circumstances to occur or continue while avoiding a conflict of interest or the appearance of a conflict interest that would otherwise violate this Policy.

### **Waivers of this Code**

Any waiver of this Code may be made only by the Board or an authorized committee of the Board and will be promptly disclosed as required by any applicable laws, rules and regulations.

### **Relationship to Other Policies, Procedures and Guidelines**

The guidelines and responsibilities set forth in the Code are in addition to, and not in lieu of, the guidelines and responsibilities set forth in the Company's other policies, procedures and guidelines.

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