



## **Cboe Global Markets, Inc. U.S. Political Contributions Policy**

Cboe Global Markets, Inc. (“Cboe”) and its U.S. subsidiaries operate in a highly regulated environment. Legislation and rules implemented by policymakers greatly affect the markets Cboe operates, and the investors Cboe serves. As such, advocacy and education play a key role in our business.

### **Corporate Political Donations**

The use of corporate funds to make contributions to any federal candidates, political committees or other entities organized primarily for political activities under sections 527 or 501(c)(4) of the Internal Revenue Code, or to any political party that would use the money to support any candidates is prohibited. This includes direct independent expenditures as defined by the Federal Election Commission (“FEC”).

Cboe may make political contributions with corporate funds to certain state and local candidates or political entities in compliance with applicable law in consultation with Cboe’s Chief Policy Officer.

### **Individual Associate Political Donations**

Cboe associates are free to voluntarily engage in the political process including through personal political donations in compliance with applicable law. However, political donations made in a personal capacity by Cboe executive officers and directors must be in compliance with Cboe procedures.

### **Cboe Political Action Committee**

The Cboe Political Action Committee (“Cboe PAC”) is permitted to make federal contributions as described above but only with funds from voluntary contributors and not corporate funds. The Cboe PAC is permitted to solicit funds from Cboe shareholders, Cboe Board Members, Cboe subsidiary board members, and qualifying Cboe employees. The Cboe PAC is nonpartisan and may support incumbent federal candidates, political committees or other entities organized primarily for political activities under sections 527 or 501(c)(4) of the Internal Revenue Code.

Factors taken into account when making a contribution may include:

- Position and voting record on issues;
- Leadership position and committee assignments;
- Competitive race for election and candidate’s financial needs; or
- Geographic nexus to a Cboe facility.



The FEC regulates the activities of the Cboe PAC. Detail regarding all Cboe PAC expenditures is available at <https://www.fec.gov>.

### Oversight and Governance

The Cboe PAC is governed by a Board of Directors generally comprised of employees and executives of Cboe and is managed by Cboe's Public Policy Department. Cboe's Public Policy Department has oversight over Cboe's political and lobbying activities, and provides a report on such activities to the Nominating and Governance Committee of the Cboe Board of Directors on an annual basis. The Cboe PAC Board of Directors reviews the Cboe PAC budget at least once per year.

### Cboe PAC Disbursements

The Cboe PAC may contribute funds to federal candidates for Congress. All disbursement decisions of Cboe PAC funds are made by Cboe's Public Policy Department.

### **Industry Associations**

Cboe belongs to and collaborates with various industry organizations to increase the effectiveness of its advocacy efforts. Our primary industry associations advocate for a broad range of issues relating to financial markets. While our positions may not always fully align with these organizations, we work with them to advance progress where opportunities exist and use our influence with these organizations to advocate for policy changes when needed. Cboe makes determinations regarding which industry associations to collaborate with based on their commitment to supporting financial markets, in consultation with Cboe's Chief Policy Officer and Cboe's General Counsel.

A list of such organizations receiving annual fees of \$50,000 or more, and which may engage in U.S. federal lobbying activity on behalf of Cboe, is available [here](#) and is generally updated annually.

### **Lobbying Activities**

We generally advocate for policies that align with the key issues facing the financial markets industry. Our participation in policy advocacy is guided by compliance with all laws and regulations governing our policy advocacy and engagement in such advocacy in an ethical and transparent manner, consistent with our Code of Business Conduct and Ethics.

Cboe files quarterly reports that disclose our lobbying expenditures and detail our lobbying activities in compliance with the U.S. Lobbying Disclosure Act. These lobbying disclosure reports may be viewed at [disclosurespreview.house.gov](https://disclosurespreview.house.gov) by searching for Cboe Global Markets, Inc. We file similar publicly available lobbying reports with state and local agencies as required by state



and local law, which in some cases have even broader disclosure requirements than federal law. Any federal lobbying firms we hire are required to file similar reports. The industry organizations mentioned above are also subject to public disclosure obligations regarding their lobbying efforts.

### **Inquiries**

Please direct all inquiries regarding any of the provisions or procedures of this policy to the Cboe Chief Policy Officer.