

March 31, 2020

INFORMATION ON NASDAQ'S BUSINESS CONTINUITY PLANS AS A RESULT OF THE IMPACT OF CORONAVIRUS (COVID-19)

Nasdaq remains focused on ensuring that our global markets and our clients operate normally. We have a robust framework in place to manage eventualities related to a number of crisis scenarios, including pandemics. We are continuously reviewing our business continuity plans, and augmenting them as needed, to account for this rapidly evolving situation.

BUSINESS CONTINUITY PLANS

The safety of Nasdaq clients, employees, vendors, and visitors is paramount. As the situation evolves around the coronavirus (COVID-19) outbreak, Nasdaq has updated the precautionary measures put in place to promote the safety of all parties, while continuing to maintain normal operation of our markets, client services and our business processes.

In early March, we activated our business continuity plans, which created a number of alternative operating environments for Nasdaq personnel — work from home, split teams, and rotating staff schedules — to protect the health of our employees, maintain operational readiness of our markets and help flatten the curve in our communities.

We continue to review our business continuity activities and augment them as needed to account for this rapidly evolving situation. In the event that the COVID-19 situation worsens, Nasdaq is prepared to deploy additional measures.

Does Nasdaq have a pandemic plan?

Nasdaq has a pandemic plan that outlines a global pandemic management framework to provide timely communication to stakeholders and ensure the safety and health of Nasdaq employees while minimizing business impact. Each business area has a Business Continuity Plan (BCP) for its processes, which include one or all of the following: processes operating in more than one location; transference of work to another location; employees working from secondary location; or employees working from home.

Has Nasdaq's pandemic plan been tested?

Nasdaq executes BCP tests annually based on identified scenarios that would require employees to work from home, transfer work to another location, or work from alternate site locations. Broader testing has been executed in live situations through weather events in recent years.

Will there be operational changes should the situation escalate further?

Nasdaq's Pandemic Steering Committee and the Executive Leadership Team actively monitor and assess the evolving situation with the assistance of various government reporting services and will continue to take prompt action as appropriate.

What are the general lines of Nasdaq’s crisis management procedures?

Crisis Management is part of the Business Continuity Management Framework. Procedures include:

- Strategic goals and operational processes for responding to and managing incidents that may severely impact Nasdaq, its customers, employees, investors, and/or other stakeholders;
- Primary responsibility to respond to disruptions and crisis events and to ensure business continuity alignment with prevailing line-management structure at all levels;
- Depending on crisis scope and severity, primary incident-management responsibility may escalate according to a multilayer crisis team structure built up by virtual “task-forces”;

How does Nasdaq communicate with its customers?

Nasdaq will continue to monitor the situation and the impact on operations to determine appropriate client communication. Critical communications are disseminated through several channels appropriate for each business line. This includes the following landing page <https://www.nasdaq.com/solutions/corporate-services/COVID19> where subscription to a weekly newsletter is available.

What is being done to ensure Nasdaq service providers and fourth-parties can continue to support the contractual obligations to you as a customer?

Nasdaq is confirming critical service-providers' capability to operate without disruption.

OFFICE STATUS

As a responsible corporate citizen, we support government authorities and health regulatory bodies in their containment efforts by helping reducing the population density in public areas and those using mass transit, while ensuring responsible stewardship and dependable operations in service to the global markets, critical infrastructure and our clients during this critical period. As such, Nasdaq has taken measures to reduce the number of its offices that are open and changed the access status of its other offices around the world.

Nasdaq has directed all employees whose roles do not require onsite performance to work from home. For those offices that still have staff reporting on-site, we have introduced a number of programs -- including social distancing and split teams -- to help strengthen resiliency and redundancy and to safeguard market-critical and client-critical operations. Staff coming into Nasdaq offices have been directed to not use public transportation.

We continue to work in consultation with industry stakeholders and regulators, and to follow guidelines from the World Health Organization (WHO), Centers for Disease Control (CDC) and local authorities concerning the elevated risks associated with COVID-19 coronavirus.

Can all or most of Nasdaq’s employees telework for an extended period while you continue to provide critical services to your customers?

Nasdaq can continue to support business operations under the BCP for an extended period of time, with adequate capacity for employees to work from home and contingency locations.

How does Nasdaq communicate with its employees/support staff?

Keeping our employees informed of the situation is paramount. Communication to employees maybe local or global depending on what may be required and through the appropriate channels

including Human Resources, Group Risk Management, Real Estate, and/or the Location Leaders in the office.

What procedures to access Nasdaq's offices?

Closed offices may not be accessed by employees, contractors, or guests.

Employees, contractors or guests who have, or who have household members or visitors who have, traveled outside of their home countries in the last 14 days, who are experiencing flu-like symptoms, or who have potentially been exposed to COVID-19 are not allowed to access any Nasdaq offices.

Visitors are permitted only in the most exceptional of circumstances and only with executive approval.

Potential visitors must complete a registration form at least 8 hours before arriving and meet the office-access eligibility requirements stated above.

What precautions is Nasdaq taking regarding the coronavirus as it pertains to any contingent workers or consultants that provide services onsite at Nasdaq facilities either on a regular or periodic basis?

Nasdaq contingent workers and consultants who provide services on a regular basis are required to follow the same pandemic precautions as Nasdaq employees. Nasdaq's Enhanced Office Access applies to service providers who visit Nasdaq offices on a periodic basis.

What is your return-to-work procedure for employees who have self-quarantined?

Employees will be allowed to return to work after receiving medical clearance or 14 days after last exhibiting symptoms.

TRAVEL RESTRICTIONS

Until further notice, all business-related travel is suspended.

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