



2019

**Cboe Global Markets, Inc.
Environmental, Social, &
Governance (ESG) Report**



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LETTER FROM CHAIRMAN, PRESIDENT AND CHIEF EXECUTIVE OFFICER

We are pleased to share Cboe Global Markets' (Cboe) first Environmental, Social, & Governance (ESG) report. We have developed this report for our investors, associates, customers, community members, and all other stakeholders with whom we live and work. The report provides an overview of Cboe's approach to ESG. Our goal is to demonstrate how ESG practices are integrated within our strategy, business processes, and culture.

Cboe is widely recognized as a leading industry innovator, deeply committed to defining markets, and creating new ones to serve investors around the globe. We are actively engaged with policymakers on behalf of our customers to promote fairness, innovation, trust, and confidence in our markets.

Cboe is, indeed, unique. Our associates come to work inspired, knowing they can be part of the next market-defining breakthrough, whether they are writing code for a next technology release, paving the way for a new product launch, or engaging with policymakers on market improvements.

We strive every day to align our business with the principles that make us one of the world's largest exchange holding companies, offering cutting-edge trading and investment solutions to investors around the world. This commitment starts with our Board of Directors and filters into everything we do.

We recognize that operating in a socially responsible manner helps promote the long-term interests of our investors, associates, customers, community members, and all other stakeholders with whom we live and work. Our guiding principles help us deliver on our corporate mission and strategy.

We are proud to highlight key areas of our business and operations that include our approach to industry leadership, environmental performance, equal opportunity, diversity, pay equity, associate engagement, human capital management, volunteerism, philanthropy, and corporate governance. At Cboe, we are striving to become an even more socially conscious organization by making a difference in the communities where we live and work.

Thank you for reading Cboe's first ESG report. We welcome your feedback.

Sincerely,



Edward T. Tilly

Chairman, President and Chief Executive Officer





Cboe Business Overview: Defining Markets

CBOE BUSINESS OVERVIEW: DEFINING MARKETS

At Cboe, we are working on Defining Markets to benefit all stakeholders and infusing our Guiding Principles in everything we do. We are unique among global exchange operators in our ability to drive the global marketplace forward through product innovation, leading edge technology, seamless trading solutions, and industry advocacy.

Everything we do to drive the global marketplace forward is driven by the following Guiding Principles:

Creative Collaboration: An enthusiasm for working with our customers and partners to advance innovations

Active Transparency: A commitment to proactively sharing information and knowledge

Good Citizenship: A dedication to the betterment of our markets, workplace and community

Competitive Spirit: A will to succeed and be the best

Superior Service: A drive to understand needs and exceed expectations

Markets are fundamentally defined by the products they offer, and no institution has created more noteworthy tradable products than Cboe. From equity options, index options, Cboe Volatility Index (VIX) options, and VIX futures, our track record for market-defining product innovation speaks for itself. Our partnerships with leading index and service providers further strengthen our ability to create the next great product innovation.

Our legacy of innovation not only includes breakthrough products, but the creation of entirely new markets, including the first listed-options marketplace, the first pan-European multilateral trading facility (MTF), and the first ECN for the institutional foreign exchange (FX) market. These markets have grown to become some of the largest, most-relied upon in the world.

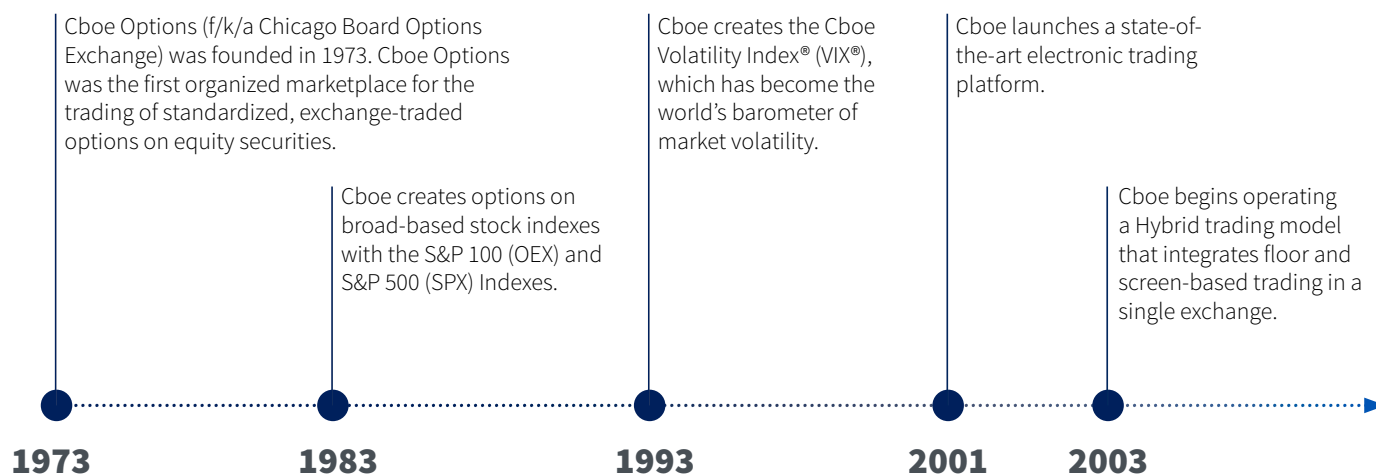
We are also defining markets through trading technology. Our industry-leading proprietary technology was built, and is continually refined, to anticipate the evolving needs of our customers. Our trading platform is developed, owned, and

operated in-house and is designed to optimize reliability, speed, scalability, and versatility. All of our U.S. equities, options, and futures markets have been successfully migrated to this cutting-edge technology. We regularly raise the bar in trading technology through an ambitious schedule of software releases and enhancements to our platforms across the globe.

The ability to impact every aspect of the trading experience – product design, trading, market data generation and packaging, analytical and educational solutions, and industry advocacy – uniquely enables our team to work with customers, partners and policymakers to define the markets of tomorrow.

Our revenues consist primarily of transaction fees, market data fees, and access and capacity fees. We also generate revenue from both the calculation and dissemination of index values and the licensing of our proprietary products. Transaction fee revenues are primarily generated on the contracts or shares traded on our platforms.

OUR HISTORY

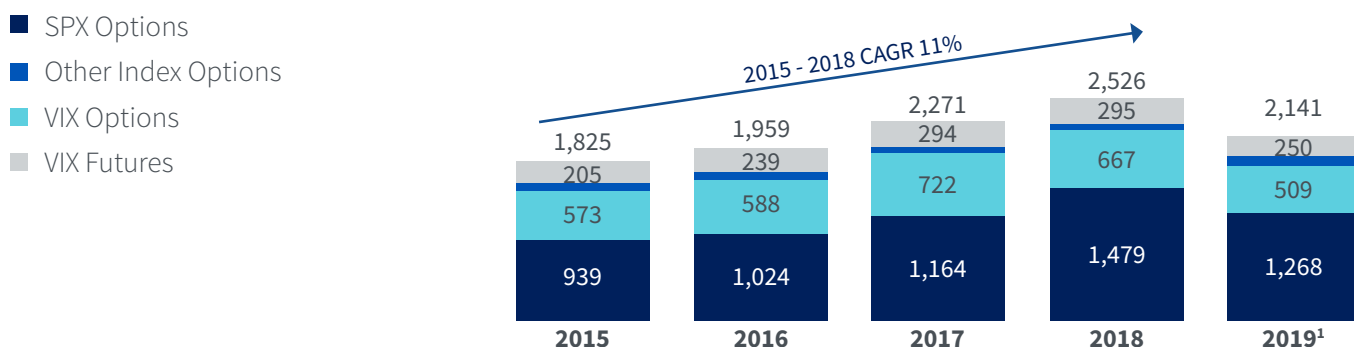


The following chart illustrates volume and notional value for Options (Cboe Options, C2 Options, BZX Options and EDGX Options); Futures (CFE); U.S. Equities (BZX Equities, BYX Equities, EDGA Equities, EDGX Equities); European Equities; and Global FX (Cboe FX) for the periods indicated (which includes information prior to the acquisition of Bats in 2017):

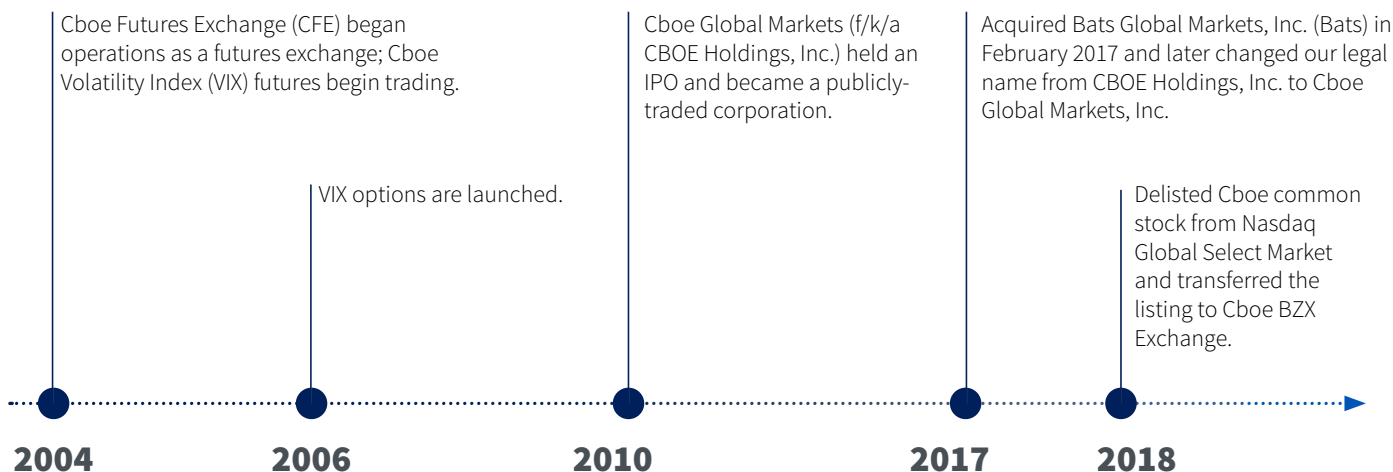
Key Business Metrics		Volumes	
Year		2018	2017
Options ADV (in millions)		7.9	6.9
U.S. Equities ADV (in billions)		1.4	1.3
Futures ADV (in thousands)		300.0	294.8
European Equities touched ADNV (€ in billions)		10.4	9.4
Global FX ADNV (\$ in billions)		37.4	29.5

ADV = average daily volume | ADN = average daily notional value

Index Options and VIX Futures (In thousands)



¹ Year to date through November 30, 2019.



PROMOTING TRANSPARENT & EFFICIENT CAPITAL MARKETS

U.S. SECURITIES MARKET

Cboe Options, C2, BZX, BYX, EDGX, and EDGA (the Exchanges) are self-regulatory organizations (SROs), each registered under Section 6 of the Exchange Act of 1934 (Exchange Act) as a “national securities exchange,” and are subject to oversight by the SEC. SROs are an essential component of the regulatory scheme of the Exchange Act, providing fair and orderly markets and protecting investors.

As registered national securities exchanges, virtually all facets of our operations are subject to the SEC’s oversight, as prescribed by the Exchange Act. The Exchange Act and the rules thereunder impose on us many regulatory and operational responsibilities, including record keeping and the day-to-day responsibilities for market operations and broker-dealer oversight. Furthermore, as SROs, the Exchanges are potentially subject to regulatory or legal action by the SEC or other interested parties.

Integrity. Fairness. Orderly Markets.

As SROs, the Exchanges are responsible for ensuring that our markets are fair, resilient and orderly. One of the main objectives of market regulation is to protect the integrity of the markets. Cboe maintains a comprehensive regulatory program that oversees its markets and enforces all Cboe and SEC rules. It is a top priority of Cboe to provide fair and orderly markets and it strives to ensure market integrity. This includes conducting regular surveillances of all trading activity and taking swift and appropriate disciplinary action against those market participants that violate the rules. To this end, the Exchanges have a dedicated in-house regulatory team and utilize the regulatory services of a securities association in support of its program.

In addition, the Exchanges are members of the Intermarket Surveillance Group (ISG). ISG is comprised of more than 50 organizations worldwide, including market regulators and exchanges from various countries around the world. The objectives of this group are to work collaboratively to monitor and identify such things as manipulative or fraudulent activities in the financial markets, and to share information between members. Information sharing allows the group to undertake investigations and/or impose disciplinary action against offending parties especially in those cases where such activity occurs across multiple markets.

Separately, Cboe has a robust process in place that includes alert policies regarding the timing and nature of public release of information, trading halts, and extraordinary market volatility².

FUTURES AND SWAPS

The operations of each of CFE and Cboe SEF are subject to regulation by the CFTC under the Commodity Exchange Act. Commodity Exchange Act and CFTC regulations establish criteria for an exchange to be designated as a contract market on which futures and futures options contracts may be traded, and for a trading platform to be designated as a swap execution facility on which certain swaps may be traded.

CFE is a designated contract market, and Cboe SEF is a swap execution facility, each of which is subject to the oversight of the CFTC and to a variety of ongoing regulatory and reporting responsibilities under the Commodity Exchange Act. As a designated contract market, CFE is required to comply with the applicable core principles and regulations under the Commodity Exchange Act, as is Cboe SEF as a swap execution facility. Consistent with the objectives noted above of Cboe’s securities exchanges, each of CFE and Cboe SEF has a dedicated, robust in-house regulatory program, including surveillance and regulatory operations and procedures to monitor and enforce compliance by Trading Privilege Holders with CFE rules, and by Participants with SEF rules, as applicable. In addition, CFE also utilizes the regulatory services of a futures association in furthering these objectives and is a member of ISG.

EUROPEAN EQUITIES

Cboe Europe Equities, one of the largest stock exchanges in Europe by value traded, is a Recognised Investment Exchange regulated by the Financial Conduct Authority in the United Kingdom and subject to certain European regulations. Cboe Europe Equities also operates a Regulated Market in the Netherlands regulated by the Netherlands Authority for Financial Markets.

² Specific rules are available for our Exchanges and can be found here: Cboe Options ([Rule 5.20](#)), C2 Options ([Rule 6.32](#)), BZX Exchange (Equities: [Rule 11.8](#); Options: [Rule 20.3](#)), BYX Exchange ([Rule 11.18](#)), EDGA Exchange ([Rule 11.16](#)), and EDGX Exchange (Equities: [Rule 11.6](#); Options [20.3](#)).



Industry Leadership

INDUSTRY LEADERSHIP

The foundation of Cboe's role as an industry leader is our deep commitment to enhancing markets and creating new ones. We actively host industry conferences, support industry groups and events, and encourage our associates to take leadership positions within the industry and community in which we operate. While proud of the recognition we have received to date, we continue to build on our successes and look for ways to further promote the incredible contributions our associates make to the industry.

HIGHLIGHTS

AWARDS

Financial News Trading and Technology Awards Europe

- Exchange Group of the Year, Cboe Europe, (2019, fifth consecutive year)
- Trading Initiative of the Year, Cboe LIS (2019) and Periodic Auctions Book (2018)
- Best Foreign Exchange Trading Platform, Cboe FX (2019)

Profit and Loss Readers' Choice Awards, Best FX Platform for Hedge Funds, Cboe FX (2019)

Fund Technology and WSL Awards, Most Innovative Exchange Technology, Cboe (2018)

CTA Intelligence Awards, Best Exchange-Innovation, Cboe (2018)

The TRADE, Leaders in Trading Awards

- Outstanding Equities Trading Venue and Outstanding Periodic Auctions Venue (2018)

Onspring Connection, Onspring Innovation Award, Cboe Internal Audit Team (2018)

INDUSTRY GROUPS



World Federation of Exchanges, Member of the Sustainability Working Group



Sustainable Stock Exchanges Initiative



Leadership Council on Leadership Diversity



Women in Listed Derivatives

ASSOCIATE RECOGNITION

CFTC Market Risk Advisory Committee, Member, Lisa Shemie (2019)	Financial News Trading and Technology Awards Europe <ul style="list-style-type: none"> • Industry Leader of the Year, Runner-Up, Dave Howson (2019) • Industry Leader of the Year, Winner, Mark Hemsley (2018) 	Foreign Exchange Professional Association (FXPA), Elected Chair, Lisa Shemie (2019)	J.P. Morgan Corporate Challenge Chicago Winner, Brett Lusgarten (2019)
Security Traders Association, Women in Finance, Ken Heath Award, Brian Schell (2019)	Women in Finance, Markets Choice Award <ul style="list-style-type: none"> • Philanthropy, Bryan Harkins (2019) • Excellence in Exchanges, Catherine Clay (2018) 		Institutional Investor Magazine, No. 1 In Trading Tech 40 List, Chris Isaacson (2018)

CONFERENCES / EVENTS / PANELS

Cboe Risk Management Conference (2019, 35th annual)	Commodity Future Trading Commission's Market Risk Advisory Committee, Climate-related Financial Risk Discussion (2019)	Women in ETFs Bell-Ringing (2019, fifth annual)	National Investor Relations Institute Chicago Chapter Event, "ESG Mini-Workshop: Navigating the Brave New World of ESG" (2019)
Security Traders Association of Chicago, ESG Panel (2019)	SEC Roundtables on Market Data and Market Access (2018)	Women in FX Networking Event, New York (2018)	

INDUSTRY GROUPS



Security Traders Association



Intermarket Surveillance Group



Equity Markets Association



U.S. Chamber of Commerce

2018-2019 LEADERSHIP ACHIEVEMENTS

2019 Cboe Risk Management Conference

Cboe hosted the 35th annual Cboe Risk Management Conference (RMC) in Carlsbad, California. RMC provides Cboe the unique ability to engage in creative collaboration to learn from and work closely with Cboe customers, which helps us create products and services that add to their trading experience and expertise. In addition to providing a forum for exploration of new products and sophisticated trading strategies, RMC provides attendees with tactics to manage risk exposure and have a positive impact on market integrity. 2019 keynote speakers included David Blitzer, managing director and chairman of the Index Committee at S&P Dow Jones, and Yukon Huang, a senior fellow at the Carnegie Endowment in Washington, D.C. and formerly the World Bank's Country Director for China.

2019 Cboe Risk Management Conference Europe

In 2019, Cboe hosted its 8th consecutive Cboe RMC Europe for the first time in Munich, Germany. The conference is the foremost financial industry conference designed for institutional users of equity derivatives and volatility products. RMC is an educational forum dedicated to exploring the latest products, trading strategies and tactics used to manage risk exposure and enhance yields. This year's keynote speakers included Philip Hammond, Member of UK Parliament, Former Chancellor of the Exchequer.



2019 Cboe Risk Management Conference Europe

Women in ETFs Bell-Ringing Ceremony at Cboe

For the fifth year in a row, Cboe welcomed representatives from Women in ETFs for an opening bell-ringing ceremony. Representatives from Women in ETFs “Rang the Bell for Gender Equality” to commemorate International Women’s Day 2019. The initiative honored past, present, and future women leaders in the financial industry. The event was held in partnership with International Finance Corporation (IFC), Sustainable Stock Exchanges (SSE) Initiative, UN Global Compact, UN Women, the World Federation of Exchanges (WFE), and Women in ETFs.



Women in ETFs Bell-Ringing Ceremony at Cboe

Catherine Clay Wins Women in Finance Award for Excellence in Exchanges

Cboe SVP, Global Head of Information Solutions Catherine Clay won the 2018 Women in Finance Award for Excellence in Exchanges. Catherine’s leadership of the information solutions team was recognized by her peers at a gala event in Manhattan. In 2019, Cboe EVP, Head of Markets Division Bryan Harkins was awarded the Women in Finance Philanthropy Award.

Cboe's Executive Sponsor of Diversity Initiatives: Brian Schell

Cboe EVP, CFO, and Treasurer Brian Schell is Cboe's executive sponsor of diversity initiatives. Brian recognizes that diversity and inclusivity needs to be a priority if they are going to become a reality in the financial services industry. As Cboe's executive sponsor of diversity initiatives, Brian is helping bring that priority to the top of the list.

Following the 2019 Women in ETFs bell-ringing on International Women's Day, Cboe associates in Chicago, New York, Lenexa, and London heard from a panel of Cboe women, moderated by Brian on "#Balance for Better" that discussed what balance means for women in today's ever changing work climate.

Brian received the 2019 Security Traders Association Women in Finance Ken Heath Award, which recognizes men who provide support of the advancement of women in the financial services industry.



Cboe's Executive Sponsor of Diversity Initiatives: Brian Schell

"I'M EXCITED TO BE A PART OF PUSHING CBOE TOWARD MORE DIVERSITY AND INCLUSIVITY."

Cboe EVP, CFO, and Treasurer Brian Schell

Cboe Audit Team Wins Big

Cboe's Internal Audit team took home the Innovation Award at Onspring Connect 2018. The Onspring Innovation Award is a peer-selected honor where users from Onspring, an audit management software provider, view client presentations, and cast votes for the organization that best represents the community motto: "Do Your Best Work." The Cboe team demonstrated how Onspring is used for managing the internal audit process, achieving significant efficiencies through automation and "telling the story" of risks and controls across their enterprise all while showcasing Cboe's competitive spirit.



Cboe Audit Team Wins Big





Environmental Performance

ENVIRONMENTAL PERFORMANCE

Cboe's environmental performance includes the availability of ESG Exchange Traded Products (ETPs) on our Exchanges, our participation in global sustainability programs such as the Sustainable Stock Exchange (SSE) Initiative, and our environmental footprint from our operations.

ESG Exchange Traded Products

We have a number of ESG related Exchange Traded Products (ETPs) currently listed on our BZX Equities Exchanges (as of 10/14/19) that cover focus areas such as clean energy, diversity and inclusion, emerging markets, and water.

Ticker	Security Name
ACES	ALPS Clean Energy ETF
RODI	Barclays Return On Disability ETN
WIL	Barclays Women in Leadership ETN
ESG	FlexShares STOXX US ESG Impact Index Fund
ESGG	FlexShares STOXX Global ESG Impact Index Fund
FRDM	Freedom 100 Emerging Markets ETF
ESML	iShares ESG MSCI USA Small-Cap ETF
NUEM	Nuveen ESG Emerging Markets Equity ETF
NUDM	Nuveen ESG International Developed Markets Equity ETF
NULC	Nuveen ESG Large-Cap ETF
NULG	Nuveen ESG Large-Cap Growth ETF
NULV	Nuveen ESG Large-Cap Value ETF
NUMG	Nuveen ESG Mid-Cap Growth ETF
NUMV	Nuveen ESG Mid-Cap Value ETF
NUSC	Nuveen ESG Small-Cap ETF
GUDB	Sage ESG Intermediate Credit ETF
TBLU	Tortoise Global Water ESG Fund
VSGX	Vanguard ESG International Stock ETF
ESGV	Vanguard ESG US Stock ETF



Sustainable Stock Exchange Initiative Observer

The Sustainable Stock Exchange (SSE) Initiative, launched in 2009 by the UN Secretary General, is a UN Partnership Program of the UN Conference on Trade and Development (UNCTAD), the UN Global Compact, the UN Environment Program Finance Initiative (UNEP FI), and the Principles for Responsible Investment (PRI). The SSE convenes Partner Exchanges from around the world who join the SSE by signing a voluntary public commitment.

In 2019, Cboe was invited to join the SSE as an observer. This allows us to participate in quarterly webinars and to join advisory groups and participate in events. Our Chairman, President, and CEO Edward T. Tilly was proud to attend the UN SSE 10 year anniversary in September 2019 in New York City, alongside the UN General Assembly gathering and Climate Action Summit.

“CBOE IS PROUD TO PARTICIPATE IN THE SSE’S 10TH ANNIVERSARY CELEBRATION, AND WE CANNOT WAIT TO SEE WHAT THE NEXT DECADE BRINGS.”

CBOE CHAIRMAN, PRESIDENT, AND CEO EDWARD T. TILLY



Ed Tilly speaks at the UN SSE 10 year anniversary in September 2019 in New York City

WFE Sustainability Working Group Member

The WFE Sustainability Working Group (SWG), launched in 2014 by WFE, is comprised of representatives from a diverse array of global stock and derivatives exchanges with a mandate to build consensus on the purpose, practicality, and materiality of ESG data. The SWG undertakes original research, publicizes its findings, and promotes the debate over ESG issues among the members of WFE, and makes recommendations to the member exchanges.

Cboe was one of the original member exchanges when the SWG was formed in 2014 and has been a participating member over the past five years. This allows us to participate in quarterly working group calls, provide and receive valuable input on key ESG topics, and participate in events all while furthering Cboe's guiding principles of active transparency, creative collaboration, and good citizenship.

Our Environmental Footprint

For this initial ESG report, we have collected data from our main office and data center facilities in order to calculate our energy consumption, Greenhouse Gas (GHG) emissions, water consumption, and waste diversion rates. We have set the 2018 calendar year as our baseline year for calculating our environmental footprint.

Our principal executive offices are located at 400 South LaSalle Street, Chicago, Illinois 60605. In addition to our Chicago headquarters, we have offices in Lenexa, Kansas and New York, New York. Our principal offices in the United Kingdom are at 11 Monument Street, London. We also maintain leased locations in California, Florida, Singapore, Amsterdam, Hong Kong, and Ecuador. We operate and maintain geographically diverse disaster recovery facilities for all of our markets.

The metrics in the next page include our main facilities with available data. As we relocate our Chicago corporate headquarters in 2020 and incorporate other offices into our ESG program, our environmental footprint may change.

The metrics below include our main facilities with available data:

OFFICES: Chicago, IL, USA • New York, NY, USA • Lenexa, KS, USA • London, UK

DATA CENTERS: Chicago, IL, USA • Weehawken, NJ, USA • Secaucus, NJ, USA • Park Royal, London, UK • Slough, UK

Energy Consumption

For our 2018 calendar year office and data center energy consumption, data center energy consumption is based on utility and IT load data provided by third-party data center providers. Our energy consumption includes energy usage attributable to Cboe from our Chicago and London offices. For our New York and Lenexa offices, only sub-metered electricity data was available. Our energy consumption includes electricity data attributable to Cboe at the following data center locations: Chicago, Weehawken, Secaucus, Park Royal, and Slough.

Metric	2018
Total Energy Consumption	45,092 MWh
Data Center Provider Renewable Energy Purchased ³	22,920 MWh

Greenhouse Gas (GHG) Emissions

Our 2018 calendar year Greenhouse Gas (GHG) emissions from our offices and data centers was calculated using the US EPA's Simplified GHG Emissions Calculator Version 3.2 that uses the GHG Protocol's GHG calculation methodology. US Emissions factors are updated using the EPA's eGRID GHG Emissions Factors (issued March 2018) and UK Emissions factors were incorporated to the calculator utilizing UK Government Emission Conversion Factors for GHG Company Reporting for 2018. Our GHG emissions calculations are based on the same office and data centers included in our energy consumption calculations.

Metric	2018
Scope 1 GHG Emissions (Refrigerants)	1,829 mtCO ₂ e
Scope 2 GHG Emissions	22,392 mtCO ₂ e
Total Scope 1 and Scope 2 Emissions	24,220 mtCO ₂ e
GHG Emissions Reductions from RECs/ Green Products Purchased by Data Center Provider ⁴	15,466 mtCO ₂ e

Water Consumption

Our 2018 calendar year water consumption data for our Lenexa and London offices is included below. Water consumption data was not available from our Chicago and New York offices as well as from our data centers and are not included in these calculations.

Metric	2018
Water consumption	1,613,030 Gallons

Waste Diversion

Our 2018 calendar year waste diversion data for our Chicago, Lenexa, and London offices is included below. Waste diversion data from our New York office and our data center locations was not available and is not included in these calculations. Recycled percentage includes the waste to energy portion of the UK office waste stream.

Metric	2018
Non-hazardous waste	168 Short Tons
Recycled	28%
Landfilled	72%

³ One of our third-party data center providers purchased Renewable Energy Certificates (RECs) from wind energy for our US data center locations and a green product purchased through a supplier (REGO-backed certified renewable energy) for our UK data centers.

⁴ See note above.



Diversity and Associate Engagement (Social)

DIVERSITY AND ASSOCIATE ENGAGEMENT (SOCIAL)

In furtherance of our commitment to diversity, in November 2019, a Cboe Women's Initiative was formally launched company-wide. The Initiative is being led by a group of senior-level Cboe women, and its mission will focus on two pillars consistent with Cboe's core principles – defining community, and defining careers. Each pillar will be comprised of several independent initiatives, including focus on talent management, exploring the development of an internal diversity policy, the creation of a mentorship program, and the organization of networking, speaker, and educational events designed to enhance the career development of the women of Cboe.

Equal Opportunity, Diversity, and Pay Equity

Cboe fosters and values the diversity of our workforce. Cboe is an equal opportunity employer and provides equal employment opportunities to all qualified persons without regard to sex, race, color, ethnicity, creed, religion, national origin, ancestry, citizenship status, age, veteran or military status, disability, marital status, domestic partnership or civil union status, pregnancy, sexual orientation, genetic status, gender identity or expression, and any other characteristic protected by law (a "Protected Characteristic").

Cboe is committed to applying our Equal Employment Opportunity Policy to all employment practices that impact the terms and conditions of employment including, but not limited to, hiring, evaluation, discipline, promotion, training, compensation, transfer, and termination. Cboe also values pay equity across the organization. In 2018, we completed a baseline pay equity study and are in the process of completing the 2019 study and implementing the findings.

Actively nurturing and maintaining a diverse and inclusive culture at Cboe is a core imperative. We believe that our collective and unique perspectives fuel our capabilities, enhance our team spirit and enable us to attract and retain top talent as we define the markets of the future. One of the most compelling examples of our pledge to equality, diversity and inclusion throughout our company is the completion of our first pay equity study in 2019. This focus has translated into an annual commitment to conduct an annual pay equity audit tied to our associate compensation review process to help us continually improve on our process.

To maintain and strengthen our efforts in this area, we also review the critical touchpoints across the associate journey with Cboe to keep a level playing field, from the talent selection, promotion, leadership development and succession planning processes and make adjustments, as necessary, to ensure opportunity parity across the company. Our goal is to ensure that equal pay and equal opportunity for all that results in a collaborative, high performing organization bringing new innovations to market and providing superior service to our customers.

OUR ASSOCIATES

The below data represents full-time employee statistics, which does not include independent contractors and consultants, and is based on 2019 numbers post completion of Cboe's system migration.

Associates by Region 2019		
	Total	%
Asia	4	0.5%
Ecuador	12	1.6%
Europe	94	12.5%
USA	645	85.4%
Total	755	100.0%

Associates by Gender by Region 2019		
	% Male	% Female
Asia	75%	25%
Ecuador	75%	25%
Europe	79%	21%
USA	73%	27%
Total	74%	26%

Organizational Level by Gender 2019		
	Male	Female
Executive Officer/Vice President	69%	31%
Senior Director/Director	78%	22%
Manager/Supervisor	70%	30%
Individual Contributor	73%	27%
Total	74%	26%

Associates by Generation 2019		
	Total	%
Generation Z (1997 onwards)	4	1%
Generation Y / Millennials (1981 -1996)	270	36%
Generation X (1965 -1980)	350	46%
Baby Boomers (1946 -1964) and Silent Generation (1928 -1945)	131	17%
Total	755	100%

HUMAN CAPITAL MANAGEMENT

Cboe has a robust human capital management program in place focused on performance and career development, health and well-being, comprehensive benefits, training, and succession planning for our associates.

Performance and Career Development

Cboe expects associates to perform their duties to the best of their ability and to develop their competencies for career growth. We recognize the need to provide ongoing, timely, and constructive performance feedback. Cboe has designed a Performance Management Program that drives the professional development of our associates while also providing fair and equitable rewards and recognition.

Associate Health and Well-Being and Comprehensive Benefits Program

Cboe's vision is to improve the overall wellness of associates through education and activities that support a healthy lifestyle, resulting in improved health and productivity. Our goal is to provide a corporate atmosphere of collective well-being that will incorporate strategies for physical, emotional and financial wellness. We have designed programs focused on these areas that include mindful meditation trainings, stress and change management classes, and meetings with financial consultants.

Cboe understands the importance of benefits to our associates and their families. This is why Cboe is committed to providing the best options possible to assist employees in a healthy lifestyle. In 2019, the Cboe benefits plan for eligible employees in the United States included the following programs:

- Medical Plan
- 24/7 Nurseline
- Virtual Office Visits
- Health Advocacy
- Employee Assistance Program
- Accident Insurance
- Prescription Drugs
- Dental Plan
- Vision Plan
- Health Savings Account
- Flexible Spending Account
- Disability and Life Insurance
- SMART (401(k)) Plan
- Employee Stock Purchase Plan (ESPP)
- Commuter Benefits
- Parental Leave
- Paid Time Off for Vacation, Personal Days, Jury Duty, and Community Service

PERFORMANCE MANAGEMENT PRINCIPLES



Align performance expectations with strategy and goals of the business



Ongoing, open dialogue regarding performance and development



Foster accountability for behaviors and actions which contribute to a positive culture



Commitment to delivering results which drive our business

Tuition Reimbursement

Cboe is committed to the professional growth and development of our associates. To support this important investment in the future of Cboe and the individual, the company provides financial assistance by reimbursing eligible associates who choose to continue formal education.

Town Halls, Associate Engagement Survey, and an Open Door Policy

Cboe is committed to providing the best possible working conditions for our associates. Cboe seeks to create an open and frank atmosphere in which any grievance, complaint, suggestion or question receives a timely response. Cboe offers a whistleblower hotline for complaints, which can be made anonymously. Additionally, associates can raise questions and suggestions to the Cboe Human Resources team either in-person or via a group email address. Questions and suggestions that are submitted to the Cboe Human Resources group email are either responded to individually or addressed at our Global Town Hall meetings. All associates are expected to treat each other with respect.

The senior management team leads monthly town hall meetings with all global associates. The objective of these town halls is to provide associates an update on company news, share updates from major business lines, as well as provide a forum to ask questions and offer feedback. Town halls can include updates on anything from legislation that may impact our business to Environmental, Social, & Governance (ESG) topics.

In 2018, Cboe conducted an associate engagement survey and has implemented career, leadership, and culture focused programs in response to the survey findings as applicable. Specifically, Cboe formed an inaugural culture champion group, which is comprised of over 50 diverse associates and is charged with helping leaders drive analysis of survey results, understand context, and serve as active participants in the improvement process by sharing their ideas. Additionally, Cboe launched CboeU, an online learning system, to create real-time resources for ongoing skill development, including 110 courses that span technology, manager, and soft skills training.

66 associates

supported in 2018 for a total of \$230k+ in pre-tax financial support for continuing education

Associates are encouraged to offer positive and constructive feedback. Our senior management team has a commitment to an open-door policy and encourages the free flow of information and communication in furtherance of active transparency.

Training and Succession Planning

People managers globally participated in a two day training focused on the “4 Essential Roles of Leadership” (1. Inspire Trust; 2. Create Vision; 3. Execute Strategy; 4. Coach Potential). The senior management team participated in an additional one day workshop focused on their roles.

Cboe has held several succession planning discussions with the Compensation Committee and Board of Directors to plan for the fulfillment of essential roles, such as the CEO and other senior officers. Diversity and inclusion are a formal part of Cboe’s succession planning process as we work to identify potential incumbent or external market successors and evaluate their readiness and needs.

Volunteerism and Philanthropy

Every day, Cboe associates make positive contributions to the communities where they live and work. Cboe believes in making a difference in our communities by being good citizens and in supporting our associates’ commitment to charitable causes.

Associates are encouraged to participate in volunteer opportunities in their respective communities. Associates are eligible for one paid day community service each calendar year and can get support from Cboe for the registration fee to participate in a walking, running, or biking event that primarily supports a charitable organization in the Kansas City, Chicago, New York, or London metro areas. Eligible associates can also use a paid School Visitation Leave Day to attend school conferences or classroom activities.

The Cboe Matching Gift Program matches eligible gifts on a dollar-for-dollar basis to qualifying nonprofit organizations up to \$7,500 each calendar year per associate.

Cboe Matching Gift Program

Participation	2018	2017 ⁴
Number of Associates	82	67
Number of Charities	157	108
Matching Gift Total	\$204k	\$300k

⁴ 2017 metrics only include Bats associates.

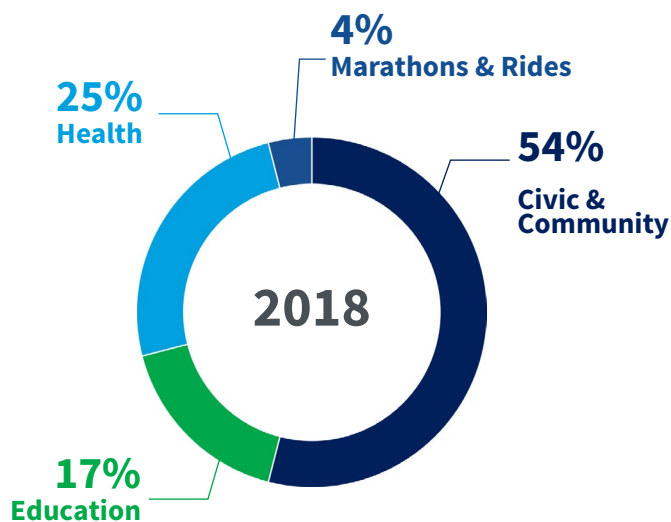
Cboe Charitable Contributions

Cboe's corporate charitable giving supports numerous organizations that are making a meaningful impact in the lives of our associates, customers and the communities in which we work and live.

Cboe Charitable Contributions *(continued)*

2018: **\$488,950**

2017: **\$347,350**



2018 Cboe Corporate Donations: Top 10 Organizations

1. Autism Science Foundation and Autism Speaks Walk (Chicago)
2. St. Jude's Research Hospitals (Wall Street Taste of NY dinner)
3. Boy Scouts of America Pathway to Adventure
4. Econ Illinois
5. American Jewish Committee
6. Hope Faith Ministries
7. Alzheimer's Hope on Harbor
8. Friends Without a Border
9. Muscular Dystrophy (Wings Over Wall Street)
10. The Valerie Fund

FEATURED PROGRAMS

Cboe Rides FAR to Support the Autism Science Foundation

Cboe associates participated in the 4th Annual Wall Street Rides FAR cycling event in October 2018, in White Plains, New York. Co-founded by Bryan Harkins, Cboe's EVP, Head of Markets Division, participation in the event has grown every year as members of our industry and their families join us for a fun day of camaraderie in support of a tremendous cause. The Autism Science Foundation receives 100 percent of the funds raised.



Cboe Rides FAR to Support the Autism Science Foundation

Econ Illinois

Econ Illinois provides economic and financial literacy programs designed to help people of all ages become smart decision makers, consumers, savers, and investors. Cboe hosts a Stock Markets Award reception each fall and spring to celebrate students who have spent the school year researching and evaluating

stocks, bonds, and mutual funds and making the smartest, informed economic decisions. Additionally, Cboe EVP, CFO, and Treasurer Brian Schell is a member of the Econ IL Board of Directors and Cboe associate Sharon Staniel, Director, Political & Civic Affairs, is a trustee board member.

WITS (Working in the Schools) and Thanksgiving Celebration at Cboe

Cboe's Chairman, President, and CEO Edward T. Tilly sits on the Board of Directors of WITS, whose mission is to set students on a trajectory for success by building critical literacy skills and developing positive self-identity through teacher led literacy professional development and volunteer powered mentorship programs. Cboe's Chicago office also participates in the WITS program by hosting weekly tutoring and reading sessions with children from a nearby Chicago public school. During the 2017-2018 school year, 31 Cboe associates mentored 22 students over 806 hours. During the 2018-2019 school year, 25 Cboe associates mentored 15 students over 650 hours. Cboe also hosted Drake Elementary students for a Thanksgiving gathering.



WITS and Thanksgiving Celebration at Cboe

Cboe Europe Associates Lend a Helping Hand

It was a busy day of garden clean-up and building, when volunteers from our London office helped out at Shaw Trust for Cboe Europe's annual Community Service Day. The Cboe team built a polytunnel greenhouse for the Shaw Trust's working nursery. Shaw Trust is a national charity helping people enter work, gain an education, improve their well-being, and rebuild their lives through various initiatives, including horticulture.



Europe Associates Lend a Helping Hand



Cboe Cleans up the Parks

The Chicago, Lenexa, and London offices volunteered to participate in local park clean-up activities. It was a great opportunity to not only improve our community, but also to meet colleagues in different departments.

Cboe Cleans Up the Parks



Corporate Governance

CORPORATE GOVERNANCE

Cboe is committed to good corporate governance, which promotes the long-term interests of our stakeholders by providing for effective oversight and management of the company. Cboe's Board of Directors exhibits an effective mix of skills, experience, diversity,

and perspectives⁵. We also have robust policies and procedures in place related to Risk, Cybersecurity and Information Technology, Vendor Management, Business Code of Ethics, and Whistleblower Protection.

Board Features

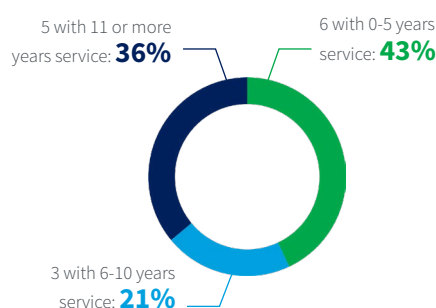
- 13 of the 14 Directors are Independent
- Directors are Elected Annually
- Majority Voting Standard in Election of Directors
- Majority Voting Standard for Bylaw and Charter Amendments
- Independent Audit, Compensation and Nominating & Governance Committees
- Regular Executive Sessions of Board and Committees
- Lead Independent Director
- Risk Oversight by Board and Committees, including a Risk Committee
- Anti-Hedging, Anti-Pledging, and Clawback Policies
- Commitment to Environmental, Social, and Governance Considerations
- Annual Board and Committee Self-Evaluations

Board Composition

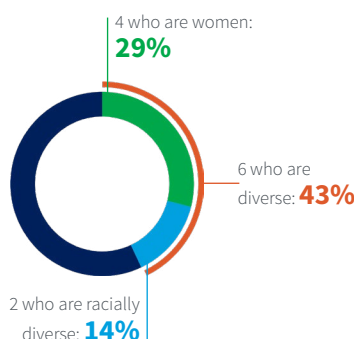
- 14 directors (92% independent: 13 Independent, 1 Non-Independent)
- 29% women (4 women, 10 men)
- Racially diverse: 2 directors
- Age: range from 50 -73
- Tenure: 64% have tenure less than 10 years
- 6 Committees (Audit, Compensation, Executive, Finance and Strategy, Nominating and Governance, Risk)

BOARD REFRESHMENT

7 Years Average Tenure

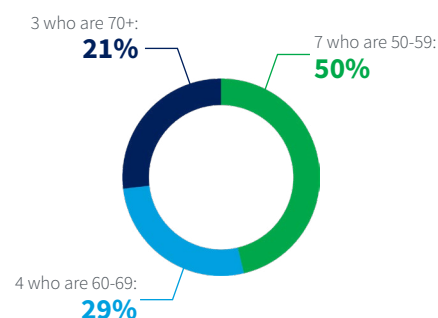


DIVERSITY

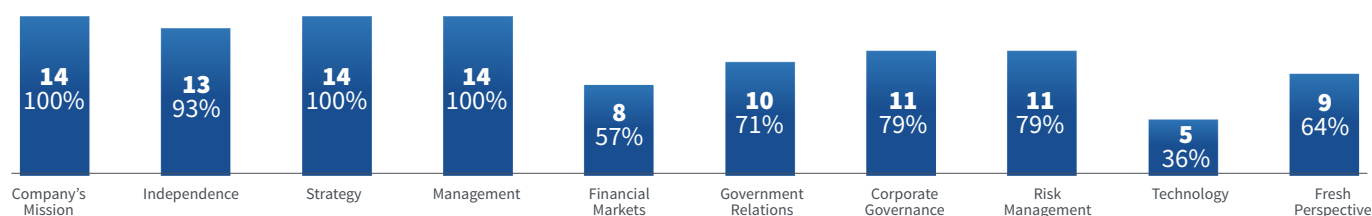


AGE

62 Years Average Age



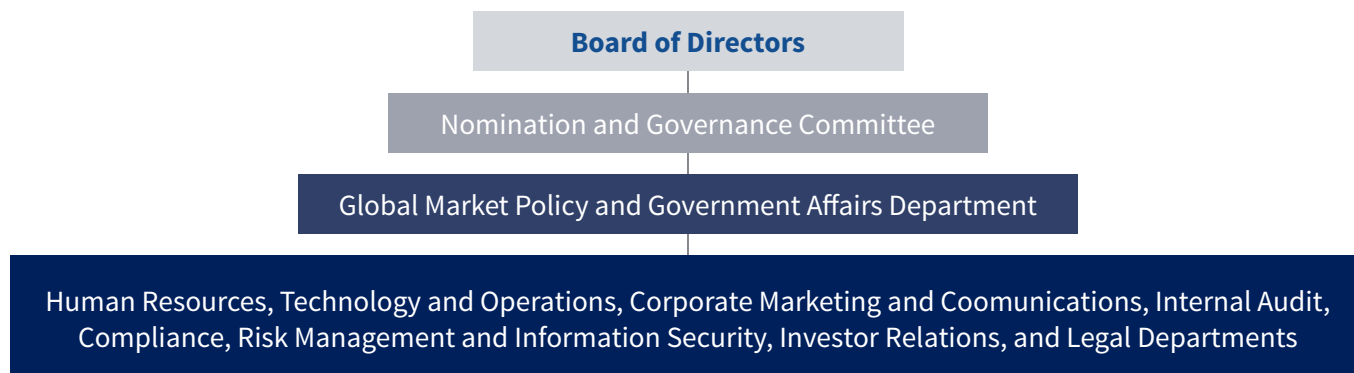
Qualifications and Experiences



⁵ Board Features and Board Composition data reflects information available as of November 30, 2019.

Board Oversight of ESG

The Board oversees our Environmental, Social, & Governance (ESG) program. Within the Board, the Nominating and Governance Committee oversees the implementation of our ESG strategy. Internally, the Global Market Policy and Government Affairs department leads our ESG efforts and collaborates closely with our Human Resources, Technology and Operations, Corporate Marketing and Communications, Internal Audit, Compliance, Risk Management and Information Security, Investor Relations, and Legal departments.



Board Oversight of Risk

The Board is responsible for overseeing our general risk management strategy, the risk mitigation strategies employed by management and the significant risks facing us, including competition, reputation, and technology risks. The Board stays apprised of particular risk management matters in accordance with its general oversight responsibilities.

The Risk Committee is generally responsible for, among other things, overseeing the risk assessment and risk management of the company, including risk related to cybersecurity, privacy, and information technology, and the company's compliance with laws, regulations, and its policies.

Board Oversight of Cybersecurity and Information Technology

The Board recognizes that our business depends on the integrity, performance, security, and reliability of our technology systems and devotes time and attention to the oversight of cybersecurity and information security risk. In particular, the Board and Risk Committee each receives updates and reports on information security from management, including from the company's Chief Risk Officer and Chief Information Security Officer.

More specifically, the Risk Committee receives presentations throughout the year on cybersecurity, information technology, data privacy, and information

related to third-party assessments of the company's information security program. The Risk Committee also receives quarterly reports regarding the overall status of the company's information security program.

Enterprise Risk Management Policy

Cboe aims to identify, assess, respond to, and report opportunities and threats that could affect the achievement of the company's goals and objectives. We have implemented an Enterprise Risk Management (ERM) program based on the principles outlined in the 2017 COSO Enterprise Risk Management — Integrating with Strategy and Performance framework. The purpose of this program is to define the company's risk management approach, objectives, roles, responsibilities, and key components.

The Chief Risk Officer, with oversight from the Risk Committee, is primarily responsible for the administration of the ERM program and conducts periodic risk management training to help ensure associates and the Board continue to be apprised of their responsibilities and effective risk management techniques. The Chief Risk Officer chairs the Enterprise Risk Management (ERM) Committee, which is comprised of representatives from functional areas determined to most likely represent potentially significant risk to Cboe. The ERM Committee is charged with, among other things, the identification of current and emerging risks across organizational and functional boundaries.

THREE LINES OF DEFENSE

In addition to our Board, our management is responsible for daily risk management. To help achieve this goal, the ERM framework is supported by a three lines of defense approach, which involves the Business, Chief Risk Officer, ERM Committee, Compliance Department, Internal Audit Department, and the Board and Committees.

First Line of Defense

As the first line of defense, Business is responsible for the oversight, supervision, and monitoring of Cboe's policies and related control procedures. Ongoing monitoring by Business provides the first opportunity to identify and correct control related concerns.

Second Line of Defense

The second line of defense is comprised of our Compliance and Risk Management (including the ERM Committee). Compliance and Risk Management provide independent oversight by assessing risk, advising management, monitoring, and reporting on any identified deficiencies or gaps.

Third Line of Defense

Internal Audit serves as the third line of defense by providing additional assurance that key processes and related controls are designed and operating effectively. The Senior Vice President and Chief Audit Executive report to the CEO and the Audit Committee.

Vendor Management Policy

Cboe has a robust Vendor Management Policy to be adhered to by all associates regarding the management and oversight of third party providers. The Chief Risk Officer, with oversight from senior management, is primarily responsible for the development, administration, coordination, implementation, and maintenance of the company's vendor management program.

There is a defined process in place to rate new vendors during due diligence. Vendors determined to be high risk are assessed annually. Assessments include security questionnaires and reviews of Service Organization Controls (SOC) Reports, where applicable. Cboe's Vendor Management Policy is based upon guidance provided by the Office of the Comptroller of the Currency's OCC Bulletin 2013-29 Risk Management Guidance.

Consistent with the oversight of other risk management processes, the Risk Committee is responsible for overseeing the risks associated with the vendor management program. The Chief Risk Officer is responsible for reporting on the vendor management program to senior management and the Risk Committee. All associates are responsible for compliance with this policy and targeted training is provided to appropriate departments and personnel.

Code of Business Conduct and Ethics

The Cboe Board of Directors adopted a Code of Business Conduct and Ethics (the Code) 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. All directors, officers, and associates of Cboe and its subsidiaries are expected to conduct themselves in compliance with this Code and to certify that they have read and understand the Code annually.

The Code includes provisions covering the following topics:

- Conflict of Interest
- Corporate Opportunities
- Confidentiality of Information
- Fair Dealing
- Protection and Proper Use of Company Assets
- Compliance with Laws (Antitrust, Anti-Corruption and Bribery, Insider Trading)
- Business Records
- Reporting Illegal or Unethical Behavior

Conflict of Interest

Cboe has a Conflict of Interest Policy in place to ensure that associates are informed of their duty to avoid conflicts, or the appearance of conflicts that may arise between personal and business interests. An actual or potential conflict of interest exists where any personal or business arrangement of an associate or an immediate family member is or could be inconsistent or appears to be inconsistent with the business interests of the company, or where an associate or an immediate family member has a personal interest that is incompatible with an unbiased exercise of judgment in connection with company employment.

Whistleblower Protection

Cboe has an established anonymous whistleblower hotline and web-intake process. Cboe does not tolerate retaliation against any person who raises an ethics or compliance issue. Individuals who raise concerns or who help to resolve reported matters are protected against retaliation.

Anti-Corruption Laws and Bribery

Cboe is committed to complying with applicable anti-corruption 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, all parties subject to the Code may not pay, loan or otherwise disburse any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind as bribes, “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 company.

Anti-Harassment and Non-Discrimination Policies

Cboe does not tolerate any conduct that has the effect of creating a hostile or intimidating work environment, including conduct which unreasonably interferes with an individual’s work performance, or adversely affects an individual’s employment opportunities. Harassment is defined as any unwelcome physical or verbal conduct that denigrates or shows hostility or aversion toward an individual because of his/her legally Protected Characteristic. Offensive conduct or material may not be displayed, disseminated, or circulated on Cboe’s premises and is also prohibited at any Cboe sponsored event or social occasion.

Cboe is committed to providing a business environment free of employment discrimination - a workplace which fosters respect and promotes positive and productive working relationships among associates. Cboe prohibits discrimination against or harassment of any applicants, customers, contractors, vendors, or suppliers of Cboe by any associate, officer, director, committee member, and other official or agent of Cboe.

Consistent with this objective, it is against Cboe policy for any associate, or non-associate on Cboe’s premises, to discriminate against or harass any person on the basis of any characteristic protected by applicable law. It is a violation of our policy for any associate to engage in any of the unlawful acts of harassment, and such misconduct will subject an associate to corrective action up to and including termination.



About this Report

This is Cboe's first Environmental, Social, and Governance (ESG) report. We defined the report content and topic boundaries based on feedback from external and internal stakeholders. We also referenced ESG reporting frameworks, standards, and industry groups such as the Sustainability Accounting Standards Board (SASB), Task Force on Climate-related Financial Disclosures (TCFD), Global Reporting Initiative (GRI), UN Sustainable Development Goals (SDGs), World Federation of Exchanges (WFE) Sustainability Working Group (SWG), and Sustainable Stock Exchanges (SSE) Initiatives.

The operational boundary for the quantitative environmental footprint metrics was Cboe owned and leased facilities with available data and covering the 2018 calendar year. Based on available data, this report also includes non-environmental information from the 2017 calendar year and partial year data from the 2019 calendar year. Cboe engaged HXE Partners to support the report content development, quantitative data collection and calculations, and report design. Our environmental information included in this presentation is preliminary, unaudited, and subject to revision.

Please send feedback and questions regarding this report to Nicole Gordon (Ngordon@cboe.com) or Kyle Edwards (Kedwards@cboe.com) in Cboe's Global Market Policy and Government Affairs Department.

Forward Looking Statements

This ESG report contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995 that involve a number of risks and

uncertainties. You can identify these statements by forward-looking words such as "may," "might," "should," "expect," "plan," "anticipate," "believe," "estimate," "predict," "potential" or "continue," and the negative of these terms and other comparable terminology. All statements that reflect our expectations, assumptions or projections about the future other than statements of historical fact are forward-looking statements. These forward-looking statements, which are subject to known and unknown risks, uncertainties and assumptions about us, may include projections of our future financial performance based on our growth strategies and anticipated trends in our business. These statements are only predictions based on our current expectations and projections about future events. There are important factors that could cause our actual results, level of activity, performance or achievements to differ materially from those expressed or implied by the forward-looking statements.

We do not undertake, and expressly disclaim, any duty to update any forward-looking statements whether as a result of new information, future events or otherwise, except as required by law. We caution you not to place undue reliance on the forward-looking statements, which speak only as of the date of this ESG report.

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