



# 2022

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## ESG Report



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# About this report

This Report covers the twelve-month period ended December 31, 2022 for MarketAxess Holdings Inc. and all of its subsidiaries (the “Company” or “MarketAxess”). It also includes some of the activities of the MarketAxess Charitable Foundation, a charitable private foundation established by the Company. This Report does not address the performance or operations of our suppliers, contractors, or partners.

The Nominating and Corporate Governance Committee of the MarketAxess Board of Directors (the “Governance Committee”) will oversee and periodically review and assess the Company’s environmental, social, and governance (“ESG”) strategy and initiatives as outlined in this Report and make recommendations to the Company to further its ESG goals. The Board of Directors has also reviewed this Report prior to its publication.

In addition, this Report or portions thereof will be subject to Internal Audit on a periodic basis. There was no external assurance from third parties with respect to the information in this Report.

This Report includes certain non-financial data and information, which is subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. The selection of different but acceptable measurement techniques can result in materially different measurements. The precision of different measurement techniques may also vary.

The inclusion of information in this Report, or any characterization of information in this Report as “material,” “tier 1,” “tier 2,” or “tier 3” should not be construed as a characterization regarding the materiality of such information for purposes of securities laws or regarding the financial impact of such information. Please instead refer to our annual Report on Form 10-K and other filings filed with the Securities and Exchange Commission.

This ESG Report includes “forward-looking statements” within the meaning of the US federal securities laws. Refer to “Cautionary Note” for more information.

We routinely engage with our shareholders to better understand their ESG views, carefully considering the feedback we receive and acting when appropriate. For more information on our sustainability program and policies, please reach out to [sustainability@marketaxess.com](mailto:sustainability@marketaxess.com).



**Rick McVey**  
Founder and  
Executive Chairman  
of MarketAxess

# Message from Rick McVey, Founder and Executive Chairman of MarketAxess

This 2022 ESG report represents a significant new chapter in our company's drive to deliver results that benefit our shareholders, clients, employees, and communities. The Report, as in prior years, reflects our Board's and our management's view of the vital role ESG initiatives can play in driving our growth.

We believe our ESG initiatives strengthen our ability to fulfill our purpose of delivering innovation that makes the global markets in fixed-income — the world's largest asset category — work better for everyone who depends on them, from individual savers and investors to the largest institutions and governments.

These markets are moving quickly to a new stage of technology development that incorporates automation and advanced data analytics, opening them to greater participation, efficiency and transparency. We're seeing adoption of this next-generation technology across our growing global client base at a time when investor interest in fixed-income markets is on the rise.

As a leader and catalyst for these changes, MarketAxess seeks to recruit and retain talented executives and team members committed to our vision of innovation and open markets, while ensuring we remain well attuned to the values and needs of our global client base. Diversity and inclusion are important factors in achieving both objectives. For that reason, it remains a priority for our Board, leadership team and our entire employee base.

Our culture is also strengthened by a shared commitment to protecting the environment. In 2022, we first responded to the Climate Disclosure Project's climate change questionnaire and this year marks our first reporting against the Task Force on Climate-Related Disclosure framework in order to give our stakeholders better information on our climate change practices and policies.

Four core themes stand out in this year's report:

**1. We're investing more in our people than ever before.** In 2022, we increased investment in learning and development for all employees and launched a centralized learning management system. In addition, we initiated programs designed to ensure that

our company culture is one in which diverse employees can thrive. When it comes to employee benefits, MarketAxess is well positioned to compete for talent with the largest financial and technology companies.

- 2. Our support for communities is growing.** In 2022, we continued to expand philanthropic and community partnerships through the MarketAxess Charitable Foundation as well as volunteer opportunities for MarketAxess employees. The Charitable Foundation's mission is to work with organizations that support underserved communities, with an emphasis on youth education, equality, diversity, and inclusion. Our aim is to use the Charitable Foundation to help shape the future of financial technology by creating opportunities for today's youth in the fields of software development and finance.
- 3. We're using our technology to promote diversity and the transition to a greener economy.** Based on US reported data, MarketAxess ranks as the largest electronic corporate and municipal green bond marketplace for corporate and municipal green bond trading volume. The MarketAxess "Trading for Trees" initiative, now in its fourth year, resulted in over 316,000 trees being planted across nine countries in 2022. Our Diversity Dealer Initiative, launched in 2021, opened the way for large investment managers to trade more easily with minority-, women-, and veteran-owned broker-dealers, while still achieving best execution.



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Last year, we brought a bold innovation specifically designed to promote fairness and equal access to fixed-income markets – the Diversity Dealer Initiative. We know that our clients want efficient access to the services and trading liquidity of minority-, women-, and veteran-owned broker-dealers as part of their own commitment to ESG principles.

**4. Strong governance drives our commitment.** Our board has played the leading role in setting the objectives and priorities for our ESG initiatives and will continue to do so. Their industry knowledge and independent viewpoints have helped ensure that our ESG initiatives align with our company's values and the interests of our shareholders and clients. As a result, our corporate governance policies have consistently been recognized as among the best of our peers.

With our strong performance in 2022 as backdrop, earlier this month Chris Concannon, a proven leader deeply experienced in electronic markets, assumed the Chief Executive Officer role, and I have taken on a new role of Executive Chairman. I would like to congratulate Chris on his promotion as CEO. It is well deserved and, given his strengths in automation, e-trading protocols, data product delivery and ETFs, Chris is the right person to lead the Company.

Finally, I would like to thank all MarketAxess team members for their hard work in helping our company advance our ESG initiatives in 2022 and for their commitment to continued progress in 2023.

**Rick McVey**

Founder and Executive Chairman of MarketAxess

# About MarketAxess

NASDAQ

MKTX

HEADQUARTERS

New York, NY

## Employee experience

One of the most significant drivers of the success of our Company is our culture. In 2022, we continued our efforts to institutionalize our culture to ensure that all leaders, individuals, and teams across the Company are embracing and embedding our culture in all that they do. We are not only focused on positioning ourselves as an attractive place to work to prospective talent, but also throughout the entire employee journey to continually deliver a great experience for our existing employees.



As a result of this investment, we were recognized for the second year in a row by Built In's Best Places to Work awards in early 2023.

## PURPOSE

To open global markets, creating more opportunities for the companies, institutions, and individuals who depend on them.

### RECORD AVERAGE DAILY VOLUMES

**\$11.8bn**

TOTAL CREDIT

**\$5.5bn**

US HIGH-  
GRADE

**\$1.7bn**

US HIGH-  
YIELD

**\$2.8bn**

EMERGING  
MARKETS<sup>1</sup>

**\$1.5bn**

EUROBONDS

**\$379mm**

MUNICIPAL  
BONDS

**\$21.5bn**

US GOVERNMENT  
BONDS

### RECORD ESTIMATED MARKET SHARES ACROSS MANY PRODUCT AREAS

**17.9%**

US HIGH-  
YIELD

**29.0%**

(+220 BPS)

EMERGING  
MARKETS<sup>1</sup>

**15.4%**

(+330 BPS)

EUROBONDS

**4.5%**

(+240 BPS)

MUNICIPAL  
BONDS

**3.5%**

(+90 BPS)

US GOVERNMENT  
BONDS

### OPEN TRADING HIGHLIGHTS

RECORD TOTAL CREDIT OPEN  
TRADING PENETRATION OF

**36%<sup>2</sup>**

ESTIMATED PRICE IMPROVEMENT  
VIA OPEN TRADING OF

**\$945mm**

<sup>1</sup> Emerging markets market volumes and estimated market share are derived using FINRA TRACE-reportable emerging markets trading volume, principally U.S. dollar denominated corporates.

<sup>2</sup> Open Trading Penetration for total credit is derived by taking total Open Trading volume across all credit products where Open Trading is offered, and dividing by total credit trading volume across all credit products where Open Trading is offered.

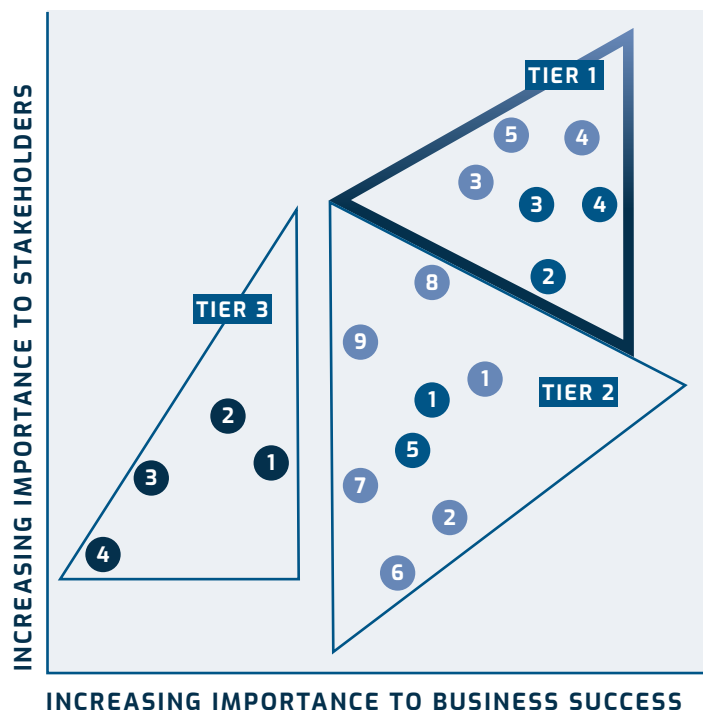
# Stakeholder engagement & materiality assessment

MarketAxess launched our formal ESG program in 2019 after taking into consideration the views of MarketAxess' stakeholders, including our employees, investors, clients, and regulators. Our ESG program is informed by the standards of the Global Reporting Initiative ("GRI") and Sustainability Accounting Standards Board ("SASB"), which is now part of the IFRS Foundation. In 2020, we introduced reporting against the non-financial metrics outlined by SASB for the following sectors: Security & Commodity Exchanges, Professional & Commercial Services, and Software & IT Services.

In 2021, we conducted our first comprehensive non-financial ESG materiality and prioritization assessment, which identified the most relevant 18 ESG topics and six priority issues for MarketAxess to manage and drive long-term business performance and societal impact. This prioritization remained our focus in 2022. We believe that the priority analysis reflects the 17 United Nations Sustainable Development Goals ("SDGs"), the SASB Standards, and other ESG topics important to our stakeholders. The analysis was also informed by an assessment of peers and clients in our industry who have been highly rated on ESG criteria. The process yielded six Tier 1 non-financial topics that are most impactful to the business. These are reflected in the priority matrix at right. We plan to conduct such an assessment every few years.

## Key ESG topics

This map identifies the most relevant 18 ESG topics most important to MarketAxess, as identified in the assessment described at left.



### ENVIRONMENTAL

- 1 Energy Management
- 2 GHG Emissions
- 3 Waste Reduction
- 4 Water Usage

### SOCIAL

- 1 Community Relations
- 2 Diversity, Equity & Inclusion
- 3 Employee Health & Well-being
- 4 Human Capital Development
- 5 Product Design & Lifecycle Management

### GOVERNANCE

- 1 Board Structure
- 2 Competitive Behavior
- 3 Customer Privacy
- 4 Data Security
- 5 Ethical Conduct of Business
- 6 Linking Executive Compensation to ESG
- 7 Responsible Supply Chain & Procurement
- 8 Systemic Risk Management
- 9 Transparency & Reporting

## Through this analysis, we identified six **Tier 1** topics:

- **Customer privacy** addresses our management of risks related to the use of personally identifiable information and other customer or user data for secondary purposes.
- **Data security** address our management of risks related to the collection, retention, and use of sensitive, confidential and/or proprietary customer or user data.
- **Ethical conduct of business** addresses our approach to managing risks and opportunities surrounding ethical conduct of business, including conflicts of interest, fraud, corruption, bribery and facilitation payments, fiduciary responsibilities, and other behavior that may have an ethical component.
- **Diversity, equity & inclusion ("DEI")** addresses our ability to encourage our culture, hiring, and promotion practices to embrace the building of a diverse and inclusive workforce that reflects the makeup of local talent pools and our customer base.
- **Human capital development** addresses our workforce talent requirements and ability to attract, retain, and develop a highly skilled workforce.
- **Employee health & wellbeing** addresses the mechanisms and resources we have in place to keep our employees physically and mentally healthy.

The 2022 ESG Report is organized to focus on these topics in order to give our stakeholders information on the topics that are highly important to our internal and external stakeholders and that we believe are likely to have a high business impact, as determined by our Global Management Team. Please also refer to our SASB Index (pg. 34) for relevant disclosure and metrics on these topics.

## We also identified eight **Tier 2** topics, including:

- **Community relations** addresses the extent to which we work to be involved in and improve the communities in which we operate.
- **Competitive behavior** addresses our management of competitive practices, including issues related to bargaining power; avoidance of collusion, price fixing or manipulation; and protections of patents and intellectual property.
- **Product design & lifecycle management** addresses the incorporation of ESG considerations in characteristics of the services we provide to our customers.
- **Responsible supply chain & procurement** addresses the extent to which we use vendors that are responsible from an ESG perspective.
- **Board structure** addresses the oversight and management of ESG strategy at our board and executive levels and whether the Board has the necessary expertise to oversee ESG risks and opportunities effectively.
- **Linking ESG to executive compensation** addresses whether and to what extent ESG goals and objectives are integrated into executive compensation plans.
- **Systemic risk management** addresses the mechanisms we have in place to reduce our contributions to systemic risks and improve safeguards that may mitigate the impacts of systemic failure.
- **Transparency & reporting** addresses our transparency around strategy, progress, and shortcomings related to material topics issues.

We have included relevant information throughout our 2022 ESG Report on these topics. Please also refer to our SASB Index for relevant disclosure and metrics on several of these topics.

## Finally, we identified the following four topics as **Tier 3**:

- **Energy management**, including the management of energy efficiency and intensity, energy mix/diversification (natural gas, solar, wind, etc.), as well as electricity grid reliance.
- **GHG emissions** addresses the greenhouse gas emissions (carbon footprint) attributed to the Company, either directly or indirectly.
- **Waste reduction** addresses the amount of waste generated by the Company's operations.
- **Water usage** addresses the amount of water used by the Company's operations.

While the results of our assessment demonstrate that these Tier 3 topics are considered by some to be of less relative importance to our business, they are nonetheless important as climate becomes an increasingly significant issue. In order to address our environmental impact, we have begun to measure our carbon footprint and Report against the framework developed by the United Nations Task Force on Climate-related Financial Disclosures (the "TCFD Framework"). Please refer to the "Environment" section (pg. 33) to learn more.

# Governance

Our Board believes good governance is good business. Strong, effective corporate governance is the foundation upon which MarketAxess has built our reputation with clients, investors, and regulators.

In this section, we address our Board Structure, as well as three of our Tier 1 ESG topics, *Customer Privacy*, *Data Security*, and the *Ethical Conduct of Business*. We also provide information on several of our Tier 2 ESG topics, including *Linking ESG to Executive Compensation*, *Systemic Risk Management*, *Transparency & Reporting*, *Competitive Behavior*, and *Responsible Supply Chain & Procurement*.

## Board structure

Our Board of Directors takes an active role in setting and maintaining high standards of governance and overseeing the establishment of sound management practices across the Company's activities, including with respect to managing our ESG strategy and initiatives. Our Board advises and oversees management on the long-term strategy of the Company. Through its committees, which meet regularly, the Board oversees business strategy, risk, financial reporting, executive compensation, succession planning, and corporate responsibility.

The Board regularly reviews our corporate governance policies and practices, including our [Corporate Governance Guidelines](#). We believe that our overall governance structure effectively serves the interest of our stockholders. Learn more about our committee structure [here](#).

Our ESG strategy and initiatives are generally overseen by the Governance Committee. In addition, other Board Committees have oversight of specific topics that fall within our ESG umbrella. For example, the Compensation and Talent Committee oversees the Company's efforts with respect to DEI and the Risk Committee oversees the Company's cybersecurity policies and procedures. Our CEO and General Counsel and Corporate Secretary share management oversight over our ESG strategy and initiatives.

The Governance Committee also assists the Board in identifying and attracting highly qualified individuals to serve as directors. Its mandate includes actively monitoring the Board's skill sets and diversity so it is in a position to address needs that may arise. This committee also developed and maintains Corporate Governance Guidelines, and oversees the annual evaluation of the Board and its committees.

## Nominating and Corporate Governance Committee

- Overall ESG strategy and materiality assessment
- Ethical conduct of business
- Environmental ESG topics
- Transparency & reporting

## Compensation and Talent Committee

- Diversity, equality, and inclusion
- Employee health and well-being
- Human capital development
- Linking ESG to executive compensation

## Risk Committee

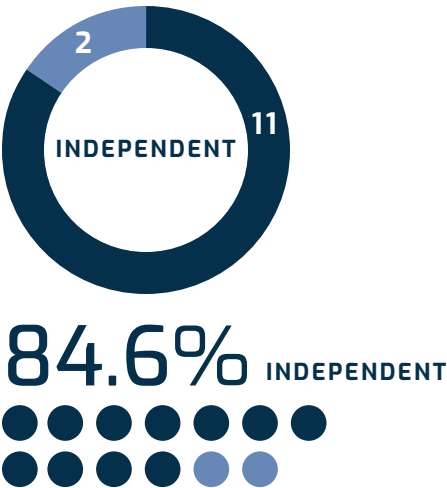
- Data security
- Customer privacy

## Audit Committee

- Ethical conduct of business

We recognize the importance of Board independence, including with respect to our ESG strategy and initiatives. As of December 31, 2022, eighty-five percent of all Board members, or 11 out of 13 directors, were independent in accordance with the requirements of the NASDAQ Global Select Market, on which our common stock is listed, and applicable securities rules and regulations. Each person serving as a director must devote time and attention to meetings and committee responsibilities. Each of our Board committees is governed by written charters available on [our website](#) that outline specific roles and responsibilities. Each committee is comprised of only [independent directors](#).

The Company recognizes and embraces that having a diverse Board enhances the Board’s effectiveness in fulfilling its oversight role and the Company’s performance, including with respect to our ESG strategy and initiatives. The Company’s Board Diversity Statement cites diversity at the Board level as an essential element in the attainment of its strategic objectives and in achieving sustainable and balanced strategic advice.

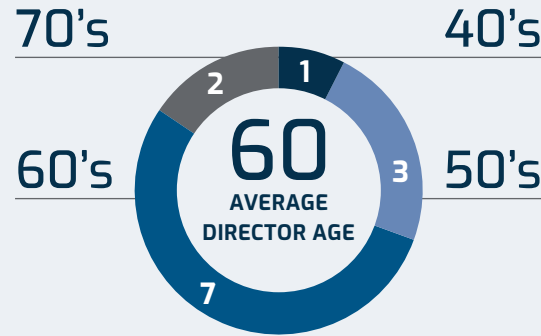
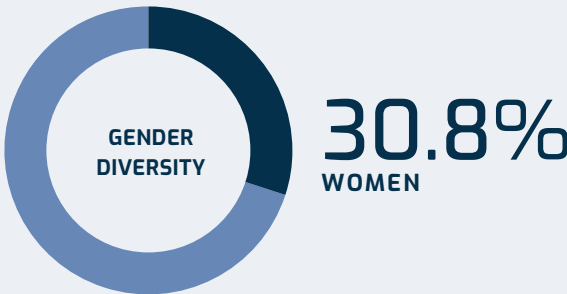
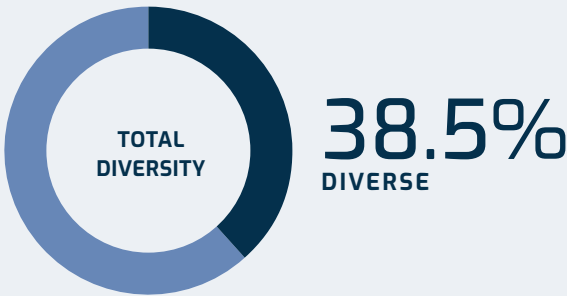


In designing the Board’s composition, diversity is considered holistically, taking into consideration, among other things, diversity of gender, age, race, ethnicity, nationality, cultural and educational background, professional experience, skills, knowledge, and length of service. In any formal search for Board candidates, the Governance Committee includes, and requests that any search firm that it engages include, qualified candidates with a diversity of race/ethnicity and gender in the initial pool from which our Governance Committee selects director candidates.

We are subject to Nasdaq Listing Rule 5605(f), which, after a transition period, will require us to have, or explain why we do not have, at least two members of our Board of Directors who are diverse, including at least one diverse director who self-identifies as female and at least one director who self-identifies as an underrepresented minority or LGBTQ+. We welcome this important step in encouraging the diversification of corporate boards and we currently meet the diversity objectives of this requirement. We are also required to publicly disclose our Board Diversity Matrix, the latest version of which will be available in our proxy statement for our 2023 annual meeting of stockholders.

The ultimate decision on all Board nominations is based on merit and the contribution that the selected candidates will bring to the Board, having due regard for the benefits of diversity. We plan to continue to refresh our Board of Directors to ensure that it remains composed of high-functioning, qualified, and diverse members able to fulfill their commitments to Board service and support our strategic growth and sustainability goals.

The following charts demonstrate the Board’s commitment to diversity of backgrounds, each presented as of December 31, 2022:

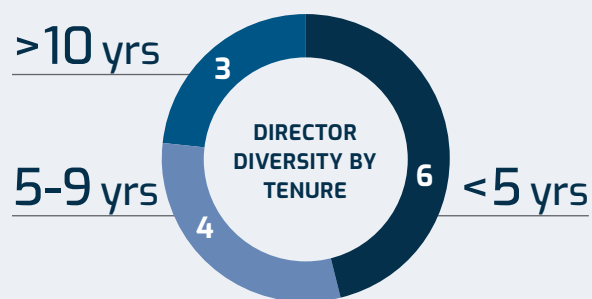


## Board refreshment and tenure

Given the complexity of our various businesses, we believe that it is in the best interest of our stockholders to ensure that our Board continues to evolve and remains composed of high-functioning, qualified, and diverse members able to keep their commitments to Board service. However, our Board believes strict limits on the number of terms a director may serve is not currently in the best interests of our Company and its stockholders as this may cause the loss of experience, institutional knowledge, and expertise important to the operation of the Board. Directors who have served on the Board for an extended period can provide valuable insight into the operations and future of the Company based on their understanding of the Company's history and objectives.

In line with this view, the Governance Committee will consider the tenure, as well as the qualifications and recent performance, of each incumbent director and the needs of the Board as a whole before recommending the nomination of that director for an additional term.

### Director tenure



### Lead Independent Director

The independent directors of our Board have appointed one of the independent directors to serve as Lead Independent Director. The Lead Independent Director has specific responsibilities, including:

- Coordinating the activities of the other Independent directors.
- Serving as a liaison between the Executive Chairman and the Independent directors.
- Approving meeting agendas for the Board.
- Approving meeting schedules to assure there is sufficient time to discuss all agenda items.

The Lead Independent Director also has the authority to call meetings of the Independent Directors and, if requested by significant shareholders, is available for consultation and direct communication. Our Lead Independent Director leads an executive session of the independent directors at each board meeting.



## Customer privacy

Our success would not be possible without the support and trust of our clients. We strive to act with integrity and handle sensitive customer information responsibly. As discussed below under “Data Security,” we apply global best practices for the security of our and our customers’ data. We continually evolve our approach to meet current best practices.

We do not have retail clients and any gathering and maintaining of individual consumer data is very limited. We seek to maintain compliance with global data protection laws, including the EU General Data

Protection Regulation (the “GDPR”), the UK Data Protection regime and the California Consumer Privacy Act (the “CCPA”), in the countries in which we operate, and contractual commitments to our clients.

We maintain a comprehensive global [Privacy Policy](#), available on our website, which outlines how data is collected, used, and shared. Our employees are responsible for complying with our data security standards and complete mandatory annual training to understand the behaviors and technical requirements necessary to keep Personal Identifiable Information (“PII”) secure. All of our employees complete annual information security training on topics such as cybersecurity and the GDPR. We also offer ongoing

education for employees to recognize and report suspicious activity, such as phishing attacks. We maintain an Executive Privacy Committee, comprised of senior leaders of the Company, that meets at least quarterly. The purpose of the committee is to ensure that MarketAxess is adequately addressing global privacy-related matters. Objectives of the committee include ensuring that MarketAxess maintains adequate technical, organizational, and security measures and policies and procedures in respect of personal data, performing regular reviews of the adequacy of our privacy arrangements and ensuring that our activities conform with the privacy-related requirements of applicable regulatory regimes.

## Data security

As a global technology company, and a marketplace for fixed income securities, we view information security as fundamental to our business. Accordingly, we aim to appropriately secure all of our business operations, including information that we generate in the performance of our services, and data provided to us by third parties, including customers, vendors, business partners, employees, and other stakeholders. We are not immune from cyber-attacks or attempted data breaches, but we have not experienced any material information security breaches in the last three years.

We are [ISO/IEC 27001:2013 certified](#), which is a global standard that specifies the requirements for establishing, implementing, maintaining, and continually improving information security management systems. Additionally, we have recently received an independent audit attestation regarding our compliance with SOC 2 Type 1, and we are in the process of obtaining a Type 2 attestation.

Our policies and procedures include:

- Robust policies and procedures relating to our data systems and data processing activities, summarized in our [Information Security Policy Statement](#) to provide assurances to customers in relation to our security systems, controls, and policies.
- Mechanisms for monitoring our data systems and usage.
- Employee training on the appropriate collection, use, and storage of data.
- A dedicated information security team staffed with skilled professionals who manage the safeguarding of our information.

The information security team is responsible for the protection of our core business operations and information against real-world cybersecurity threats. The team employs technology, policy, and education programs across our systems and employee population.

The information security team is led by our Chief Information Security Officer, who reports directly to our Chief Information Officer and Chief Risk Officer. This team is responsible for aligning our practices with the requirements of local regulations and the voluntary standards to which we strive to adhere, such as ISO/IEC 27001 and the NIST Cyber Security Framework.

The information security team maintains the Information Security Incident Management Policy, which guides our response during information security incidents and applies to all full- and part-time employees and contractors. The goal of the policy is to restore normal service operation as quickly as possible following an event, provide timely and accurate information to relevant stakeholders regarding such an event, as appropriate, and minimize the impact of such an event on our business operations. The policy is designed to ensure that we are meeting both our contractual requirements and adherence to local regulations as it applies to cyber events. In addition to the information security team,

we have assembled a group of senior members of management and third-party consultants ready to react to an event should one ever occur.

The Risk Committee of our Board receives quarterly presentations, as well as additional reports as needed, on cybersecurity and information security matters from our Chief Information Security Officer.

## Ethical conduct of business

MarketAxess was created to, among other things, make a positive difference in the global credit markets. Likewise, MarketAxess believes we should make a positive impact wherever we can—to the benefit of our employees, clients, and local communities. Our Board and management team sets the tone from the top in establishing our ethical culture. We believe good corporate citizenship pays dividends as our employees and business partners prefer to work for, or with, a company that cares about its social responsibility.

Our clients rely on us for the daily execution of thousands of trades reflecting confidential and proprietary trading strategies. Our electronic network also must operate around the globe in compliance with local regulations.

These are among the reasons, we hold ourselves to high standards of ethical business conduct in accordance with applicable laws, rules, and regulations. In line with that commitment, the Board has adopted a [Code of Conduct](#) for all employees, officers, and directors, and a [Code of Ethics for the Chief Executive Officer and Senior Financial Officers](#). Both policies provide for the ethical

handling of conflicts and provide guidelines for promoting a customer-friendly culture of honesty and accountability. Our Code of Conduct provides that employees, officers, and directors must conduct themselves honestly and ethically. These guidelines help MarketAxess employees recognize and address ethical issues, establish mechanisms to report unethical conduct, and set policies and procedures to foster a culture of honesty and accountability.

The Code of Conduct sets out the process by which conflicts of interest are identified and reported to management, and in certain instances, the Audit Committee of the Board of Directors. It also includes examples of conflicts of interest for our employees, officers and directors to review and use as examples when evaluating other potential conflicts. In addition, our Audit Committee reviews, and must approve, the Company's transactions that exceed \$120,000 in which any related person would have a direct or indirect material interest. "Related person" is as defined by applicable SEC rules and includes our directors, executive officers, and major stockholders.

The Code of Conduct also includes information on reporting concerns, both internally, including through our anonymous and confidential reporting procedures, and external whistleblowing to encourage such reporting. Management must notify the Audit Committee of any alleged violation of the Code of Conduct by a member of our Global Management Team or a director. See below for more information about our standalone Whistleblower Policy.

In addition to the Code of Conduct and Code of Ethics for the Chief Executive Officer and Senior Financial Officers, we maintain several other global policies that are designed to manage our risks and opportunities surrounding ethical conduct of business, including:

### Global corporate policies and programs

- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Compliance Program
- Code of Conduct
- Corporate Governance Guidelines
- Human and Labor Rights Policy
- Insider Trading Policy
- Personal Trading Policies
- Political Contributions and Lobbying Policy
- Slavery and Human Trafficking Statement
- Whistleblower Policy
- Vendor Risk Management and Procurement Policy

## Anti-bribery and corruption policy

The US and UK are two of our key markets. The Foreign Corrupt Practices Act (the “FCPA”) in the US prohibits bribery of government officials, and the UK Bribery Act prohibits all bribery of both government officials and private individuals. Therefore, we have adopted a global [Anti-Bribery and Corruption \(“ABC”\) Policy](#) that is applicable to all of our worldwide subsidiaries and prohibits facilitation payments. The ABC Policy is also applicable to third parties or business partners that work with MarketAxess, such as suppliers, external consultants, and joint venture partners. For these parties, we require relevant due diligence be conducted. We train and monitor our employees to ensure compliance with regulations across all markets where we operate. Our senior management is responsible for promoting the ABC Policy and for ensuring that a culture of integrity is fostered and maintained by all employees.

## Upholding human rights

We strive to operate in an ethical and lawful manner in accordance with the Universal Declaration of Human Rights includes protecting the dignity and human rights of our employees. We established a [Human and Labor Rights Policy](#) to memorialize our support of human rights and individuals’ rights in the workplace. MarketAxess has approved an [Anti-Slavery and Human Trafficking Statement](#) as part of our commitment to ensure that there is no modern slavery or human trafficking in any part of our business, including in our third-party vendors.

The Company strives to provide a safe work environment in which employees treat each other with courtesy and respect, and resolve any differences in a professional, non-abusive, and non-threatening manner. In addition, our Code of Conduct requires that all employees respect every individual and value our differences—in thought, style, sexual orientation, gender identity, race, ethnicity, culture, and experience.

## Anti-money laundering compliance program

Through our Open Trading® protocols, our clients can execute trades in an all-to-all trading environment in which MarketAxess acts as the matched principal counterparty. These Open Trading protocols improve market liquidity by allowing all participants to interact, thereby increasing the number of potential counterparties. In connection with our Open Trading® functionality, however, the way in which we conduct our business as a counterparty to thousands of trades per day is as important as our financial performance. Through our Anti-Money Laundering (“AML”) function, we are committed to meeting regulations governing identification (authentication); detecting and reporting suspicious transactions; and developing, updating, and delivering internal policies, procedures, and controls.

We examine our AML strategy and objectives on a continuing basis to ensure that it fulfills the regulatory requirements of a global platform. Our Open Trading on-boarding begins with robust client on-boarding processes and “know your customer” procedures and continues throughout the lifetime of the client relationship with annual monitoring, credit reviews, and diligence updates. Our various AML Officers oversee our policies and ensure that all employees receive appropriate training on an annual basis.



## Insider trading and personal trading policies

Our Insider Trading and Personal Trading Policies are designed to promote compliance with laws and regulations, as well as promote investor confidence in our stock and the securities available on our platforms. The Insider Trading Policy prohibits Company “insiders,” including our directors, officers, employees, and certain third parties with special relationships with the Company, as well as certain of their family members, from trading in our securities on the basis of material non-public information. It also contains “black-out” periods and preclearance provisions applicable to our insiders. The policy further prohibits our insiders from engaging in hedging or other speculative transactions in our securities and from pledging our securities as collateral for indebtedness.

Our Personal Trading Policies generally allow us to monitor the personal trading of our personnel and are designed to place restrictions to prevent violative or otherwise inappropriate trading behavior. These restrictions are meant to prevent our personnel from using information gained through their relationship with MarketAxess to engage in transactions with respect to any company's securities that could be considered manipulative or unethical. Depending on the employee's jurisdiction, the Personal Trading Policies also require duplicate trading confirmations and account statements for our personnel to be sent to us to assist our Compliance department in monitoring our employees' compliance with this policy.

## Whistleblower policy

MarketAxess has a [Whistleblower Policy](#) that prohibits discrimination, harassment, and/or retaliation against any employee, independent contractor, or agency worker who provides information or otherwise assists in an investigation or proceeding regarding any conduct or suspected conduct which he or she reasonably believes to be a violation of any laws or regulations, of any Company policy, or that is unethical. Everyone at the Company is responsible for assuring that the workplace is free from all forms of discrimination, harassment, and retaliation prohibited by this policy and staff members who engage in any activity protected by the policy may not be discharged, demoted, suspended, threatened, harassed, or otherwise discriminated or retaliated against in the terms or conditions of employment because of that activity.

Matters can be raised via a hotline, web, or mail. These procedures are open to anyone conducting business with MarketAxess—employees, stockholders, clients, suppliers, vendors, and others—to anonymously report, where permitted under local law, suspected wrongdoing. Reports made via the anonymous whistleblower escalation mechanisms are simultaneously forwarded to the Company's General Counsel and the Chairperson of the MarketAxess Board Audit Committee for investigation.

MarketAxess ensures that appropriate procedures, and, where applicable, grievance mechanisms, are in place to receive, escalate, and resolve concerns promptly and appropriately. MarketAxess investigates reports of misconduct thoroughly and confidentially, disclosing information only to those who need to know to resolve the issue.

## Political contributions and lobbying policy

We believe that financial regulation is a critical public policy issue and participate in the public policy process. This includes protecting and promoting the interests of our Company and our stockholders and carefully considering the needs and concerns of our other stakeholders. We believe that transparency and accountability are important aspects of corporate political activity. MarketAxess makes political contributions in the United States through its PAC. Our objective is to support political candidates, organizations, and measures that are aligned with MarketAxess' business interests. Therefore, MarketAxess' PAC's political contributions are intended to be for the benefit of the Company and its shareholders and are made without regard to the personal political preferences of MarketAxess officers and executives, and comply with all applicable federal, state, and local laws, rules and regulations. Our PAC's 2022 contributions disclosure is [available on our website](#). The [Political Contributions and Lobbying Policy](#) provides guidance for our political contribution and lobbying efforts and for disclosing such political contributions and lobbying efforts to the public. Prior to engaging in lobbying activities, employees must obtain guidance from the Company's Legal and Compliance Department.

## Linking ESG to executive compensation

Recognizing the increasing importance of ESG, and diversity and human capital development specifically, to the Company's business, the Compensation and Talent Committee introduced diversity and human capital goals that are among the factors considered when determining our Global Management Team's individual performance payouts for annual cash incentives and the size of long term equity incentive awards. For example, our Named Executive Officers were evaluated on items such as how they drove strategy and execution for DEI & ESG initiatives, led employee engagement survey action planning efforts and participated in MarketAxess Charitable outreach programs. The Compensation and Talent Committee believes that having our diversity and human capital goals impact Global Management Team compensation reinforces the focus on such goals. Please refer to our 2022 proxy statement, when filed, for information on how diversity and human capital development effected 2022 compensation decisions for our Named Executive Officers.

## Transparency & reporting

MarketAxess has a strong stockholder engagement program. In meetings with our largest stockholders in 2022, we received input on a range of topics including: executive compensation programs, Board and management diversity, Board and committee refreshment and evaluation, human capital development, carbon footprint analysis, and other ESG topics. We will take our investor feedback into account as we develop our work in these areas and will continue to provide updates on our progress through our engagement program, regular SEC reports, and ESG reports.

We also seek to engage with our other stakeholders on a regular basis. For example, in 2022, our management team conducted monthly global town halls with our employees discussing topics such as specific business initiatives, summaries of important technology projects, and corporate updates from leaders from across the Company. We also discuss ESG topics with our clients as questions arise.

In addition, recognizing the urgency surrounding climate change, in July 2022, we responded to CDP's climate change questionnaire and have included reporting against the TCFD framework in this 2022 ESG Report. See our "Environment" section (pg. 33) for more information.

Finally, in addition to the aggregated diversity and human capital development statistics included under "Social" in this 2022 ESG Report, the Company intends to publish our EE0-1 Report for the year ended December 31, 2022, on our Investor Relations website under "Investor Relations — Governance Documents," when available.

## Corporate governance best practices

The following list highlights our corporate governance best practices:

- No dual class of stock or controlling stockholder
- Annual election of all directors by a majority vote standard
- Lead Independent Director with defined powers and duties
- No supermajority vote provisions in charter or bylaws
- Stockholder right to act by written consent
- Succession planning program is in place for senior management
- Annual self-evaluations are conducted for the Board and Board Committees
- Board and committee meetings receive excellent attendance
- No hedging or pledging of MarketAxess Stock
- Stock Ownership Guidelines

## Systemic risk management and business continuity

As a matter of public policy, regulatory bodies in the US and the rest of the world are charged with safeguarding the integrity of the securities and other financial markets and with protecting the interests of investors participating in those markets. Our active broker-dealer and regulated venue subsidiaries fall within the scope of their regulations, and we are in frequent contact with our regulators to ensure our compliance with relevant laws and to address policy issues with respect to the fixed income markets.

The Global Management Team and the MarketAxess Board of Directors cooperate to oversee mechanisms that protect our technologies and the customers who rely on us. Our Board and the Board Risk Committee oversee the MarketAxess Global Management Team in its efforts to define the risks facing the Company, formulate risk management policies and procedures, and manage risk exposures on an ongoing basis. We have a Global Chief Risk Officer who prepares updates and reports for the Global Management Team and the Board, and assists in developing programs to identify and control risks.

We have a firm-wide business continuity plan and business continuity playbooks for each department. These tools guide the firm in promptly responding to business interruptions resulting in the loss of access to people, facilities, technology, or critical third-party vendors, and in restoring the services provided to customers within a reasonable timeframe.

## Competitive behavior

As part of our high corporate governance standards, MarketAxess does not engage in any anti-competitive or monopolistic behavior. We take care to avoid any questionable practices or matters that might implicate or cause the appearance of collusion, price fixing or abuse of bargaining power.

## Responsible supply chain and procurement

We engage with third-party service providers for a wide range of products and services—including logistics, information technology, consulting, marketing, and professional services. While such relationships aim to benefit MarketAxess in various ways, including minimizing costs and improving performance, the use of third parties to support MarketAxess' business involves risks that must be properly managed. We have adopted a Vendor Risk Management and Procurement Policy that establishes our expectations when engaging with a third-party service provider, including requiring a criticality assessment and a review of regulatory and compliance status. The criticality assessment is designed to protect employee and client confidentiality and data and to ensure they have adequate systemic controls and pose no financial risk to the Company.



# Social

In this section, we address three of our Tier 1 ESG topics, *Diversity, Equity & Inclusion*, *Employee Health and Well-being*, and *Human Capital Management*, along with several of our Tier 2 ESG topics, including *Product Design and Lifecycle Management* and *Community Relations*.

## Diversity, Equity & Inclusion (DEI)

We believe that a workforce that reflects our society as a whole better serves our clients. As such, we are committed to fostering an equitable environment that attracts and retains a diverse workforce. We continually strive to make our workforce more diverse, inclusive, and supportive of all and the Company is committed to improving our diversity at all levels of the organization, including the Board of Directors and the Global Management Team.

We are proud of the work that we have accomplished thus far in our DEI journey and are keenly focused on building a foundation to enable our DEI investments to produce meaningful results.

We have three key pillars to our DEI Strategy, which was adopted by our Compensation and Talent Committee in 2021:

# 1

**STRENGTHEN OUR  
DEI INFRASTRUCTURE**

# 2

**INCREASE DIVERSITY  
FIRM-WIDE**

# 3

**PROVIDE AN ENVIRONMENT  
WHERE DIVERSE  
EMPLOYEES THRIVE**

Strategy is focused on attracting and hiring diverse employees while assessing and evolving our environment to ensure diverse employees thrive at MarketAxess.



## Strengthen our DEI infrastructure

### Data & Analytics

We are focused on enhancing global data to inform our recruiting and retention strategy. We believe that better data will help guide where to recruit the best talent, with an emphasis on increasing diversity. In 2022, we conducted a Company-wide engagement survey, in part, to help inform our focus on global inclusion, resulting in an 80% favorable score for “Inclusion,” which is higher than global averages for financial services and on par for mid-size financial and technology companies, each according to Willis Towers Watson. Following the 2022 Engagement Survey, we conducted focus groups with specific employee populations to inform our 2023 DEI strategy. In 2022, we also adopted a new recruitment management software that allows us to, among other things, better track trends in our hiring processes with respect to diversity.

## Increase diversity firm-wide

### Recruitment

Improving DEI requires a mindset that every open role is an opportunity to diversify MarketAxess. We aim to be intentional and deliberate with every hire and value incremental improvements that we will be able to capitalize on over time. At MarketAxess, we know that recognizing the importance of something is not the same as achieving results. Therefore, starting with 2022, our Compensation and Talent Committee introduced goals that were among the factors considered when determining our executive officers’ individual performance payouts for their 2022 annual

cash incentives and the size of their annual long-term equity incentives. See “Governance — Linking ESG to Executive Compensation” for more information.

Specifically, our Board is looking for us to increase diversity in our global intern and analyst classes, while simultaneously broadening our candidate pools for more senior roles. To help improve our intern recruiting diversity, we have developed several programs dedicated to introducing women and underrepresented employees to MarketAxess and helping to prepare them for potential internship opportunities. In 2022, we achieved substantial year-over-year progress in gender diversity at the intern levels.

We use diverse hiring sources to broaden our candidate pools, including employee referrals, recruitment vendors, postings on diversity job boards, partnering with diverse professional organizations and underrepresented student organizations, and attending various recruiting events. We also focused our diversity recruiting efforts on university campuses. During the spring and fall 2022 recruiting season, we hosted MarketAxess informational sessions, coffee chats, networking events, mock interviews, hackathons, and sponsorships focused on women and underrepresented students. We also hosted two pre-identification sophomore programs that serve as an early talent pipeline for internships the following year. These two programs, one focused on women and the other on underrepresented students, are geared towards sophomores interested in the financial technology sector. In 2022, we also participated in a Grace Hopper Celebration of Women in Computing Conference, which is focused on bringing the career interests of women in computing to the forefront.



This strategy is focused on attracting and recruiting diverse employees while assessing and evolving our environment to ensure diverse employees thrive at MarketAxess.

In addition, in any searches for Global Management Team members or other senior candidates in which the Company considers candidates who are not employees of MarketAxess, we will request that any search firm that we engage includes qualified candidates with a diversity of race/ethnicity and gender in the initial pool. In 2022, we increased our racial diversity in the US employee population, and our gender diversity of our Global Management Team. See “Global workforce by gender” and “US workforce by race/ethnicity” below for our progress.

## Provide an environment where diverse employees thrive

### Management’s focus on building an inclusive environment

In addition to attracting and hiring diverse talent, we want to ensure all employees work in an inclusive environment where they can grow their careers. In 2022, the Global Management Team and other senior leaders focused on meeting with diverse employees about their career aspirations and conducting development check-ins.

We also focused on educating all MarketAxess employees about what it means to be inclusive. In 2022, our CEO hosted a firm-wide live event “Creating an Ownership Mindset” to empower all employees to own inclusion. The event was followed up by on-demand learning.

Furthermore, the integration of our Values and Leadership Expectations into Performance Reviews enables us to hold all employees accountable for being inclusive. See “Investing in growth and advancement” for more information on our Leadership Expectations.

## Employee resource groups at MarketAxess

MarketAxess sponsors three employee-led internal networks. These networks include employees who identify with, or have an interest in being an ally to, a diversity dimension in our community.

### Elevate

Our employee resource group (ERG) for Black and African American employees and their allies was launched in 2020. Elevate is a community of members who empower, uplift, and celebrate each other’s achievements at MarketAxess. Elevate’s programming focuses on ensuring its members receive professional development by providing resources and opportunities to help its members succeed at our firm. Members of Elevate also focus on attracting and retaining Black and African American professionals.

### Women at MarketAxess

Our ERG for women employees and their allies was launched in 2022. Women at MarketAxess is a global network supporting women at all seniority levels within MarketAxess to grow relationships, develop skills, and progress their careers.

### Women in Technology

Our ERG for women in technology at MarketAxess and their allies was launched in 2018. The Women in Technology group focuses on promoting the career development and recruitment of women in technology roles through networking events and supporting organizations, such as NYC Fintech Women and [AnitaB.org](https://www.anitab.org/).



## Global workforce diversity data

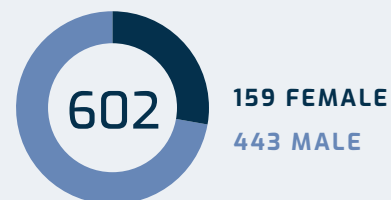
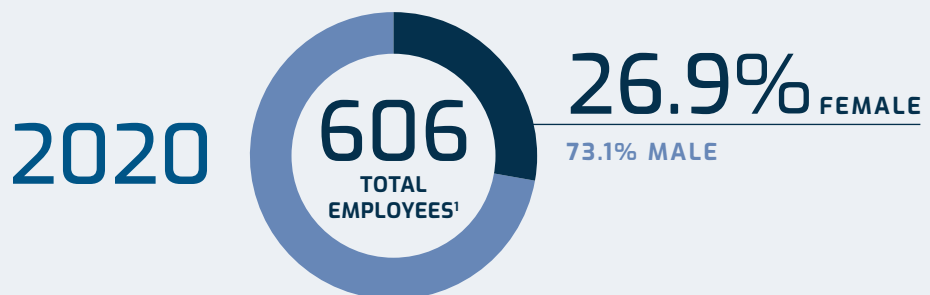
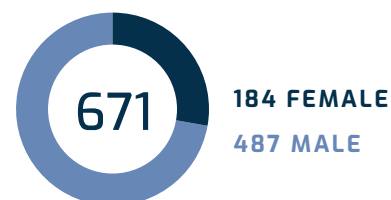
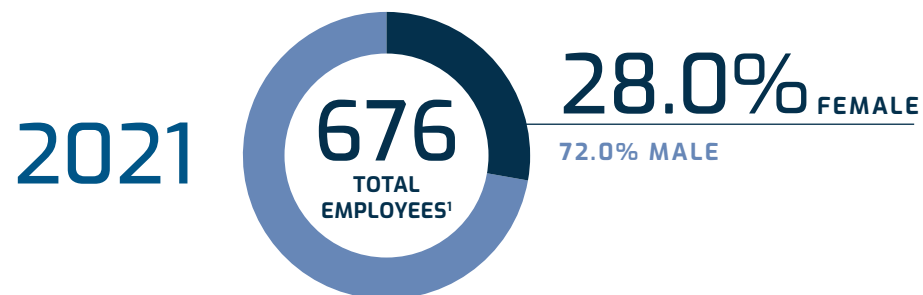
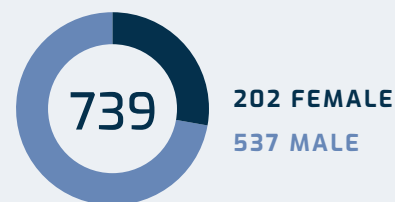
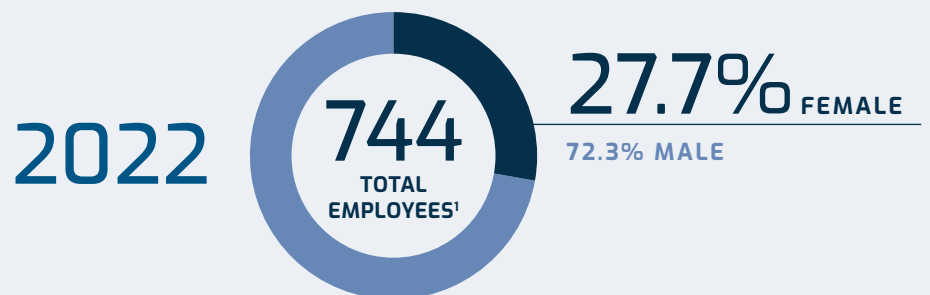
In the following charts, we provide aggregated statistics related to the diversity of our global, and where indicated, US workforce. In addition to the information below, the Company plans to post its EEO-1 Report on its corporate website under “Investor Relations — Governance Documents,” when available.

### Global workforce by gender

The charts below represent our global workforce as of December 31 of each year listed.

#### Full-time employees

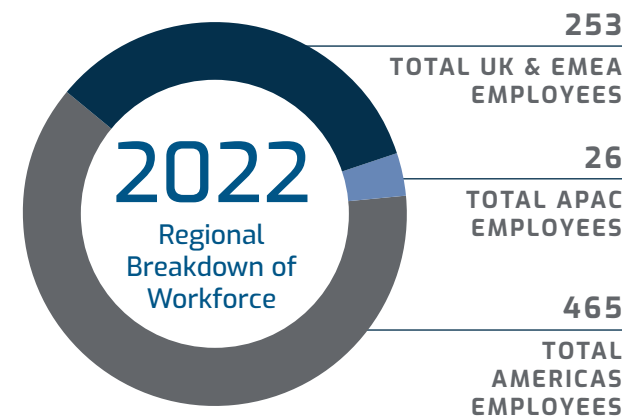
#### Part-time employees



<sup>1</sup> Employees includes fixed term contractors in the UK in each year presented.

## Regional breakdown of workforce

		2022	2021	2020
<b>AMERICAS</b>				
	Male	71.2%	70.7%	71.9%
	Female	28.8%	29.3%	28.1%
	<b>Total Employees</b>	<b>465</b>	<b>427</b>	<b>381</b>
<b>UK &amp; EMEA</b>				
	Male	74.7%	74.8%	76.0%
	Female	25.3%	25.2%	24.0%
	<b>Total Employees</b>	<b>253</b>	<b>226</b>	<b>208</b>
<b>APAC</b>				
	Male	69.2%	69.6%	64.7%
	Female	30.8%	30.4%	35.3%
	<b>Total Employees</b>	<b>26</b>	<b>23</b>	<b>17</b>



## Gender by level, global

		2022	2021	2020
<b>GLOBAL MANAGEMENT TEAM (GMT)</b>				
	Male	76.9%	84.6%	75.0%
	Female	23.1%	15.4%	25.0%
	<b>Total Employees</b>	<b>13</b>	<b>13</b>	<b>12</b>
<b>MANAGERS, EXCLUDING GMT</b>				
	Male	72.5%	70.9%	77.0%
	Female	27.5%	29.1%	23.0%
	<b>Total Employees</b>	<b>193</b>	<b>179</b>	<b>148</b>
<b>NON-MANAGERIAL EMPLOYEES</b>				
	Male	72.1%	72.1%	71.7%
	Female	27.9%	27.9%	28.3%
	<b>Total Employees</b>	<b>538</b>	<b>484</b>	<b>446</b>



**744**  
TOTAL  
EMPLOYEES

**676**  
TOTAL  
EMPLOYEES

**606**  
TOTAL  
EMPLOYEES

## US workforce by race/ethnicity

The tables below only include demographics for our United States employees. Values are presented as of December 31 of each year below.

### 2022

#### Race/ Ethnicity by level (US only)

	Asian	Black or African American	Hispanic or Latinx	White	Other, Including Not Disclosed	Total Employees
GMT <sup>1</sup>	15.40%	0.00%	0.00%	84.60%	0.00%	13
Managers, Excluding GMT	24.80%	4.60%	8.30%	59.60%	2.80%	109
Non-Managers	32.10%	5.50%	7.60%	53.10%	1.70%	343

### 2021

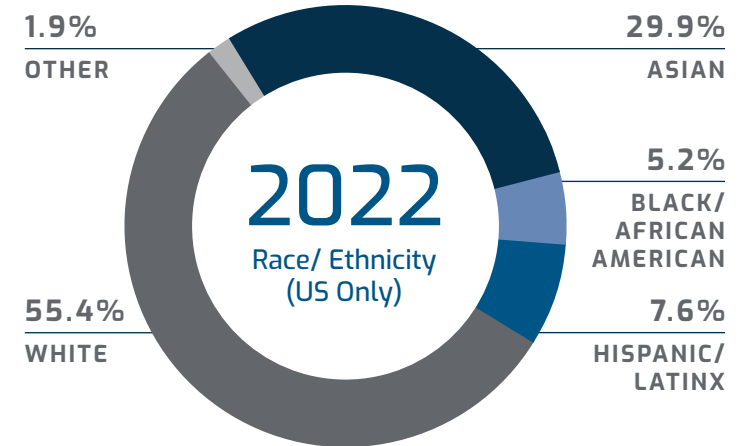
#### Race/ Ethnicity by level (US only)

	Asian	Black or African American	Hispanic or Latinx	White	Other, Including Not Disclosed	Total Employees
GMT <sup>1</sup>	7.70%	0.00%	0.00%	92.30%	0.00%	13
Managers, Excluding GMT	20.60%	5.90%	8.80%	61.80%	2.90%	102
Non-Managers	32.40%	3.80%	6.70%	54.80%	2.20%	312

### 2020

#### Race/ Ethnicity by level (US only)

	Asian	Black or African American	Hispanic or Latinx	White	Other, Including Not Disclosed	Total Employees
GMT <sup>1</sup>	8.30%	0.00%	0.00%	91.70%	0.00%	12
Managers, Excluding GMT	17.20%	5.70%	9.20%	66.70%	1.10%	87
Non-Managers	31.30%	5.00%	5.70%	55.90%	2.10%	281



#### Race/ Ethnicity (US only)

	2022	2021	2020
Asian	29.9%	28.8%	27.5%
Black or African American	5.2%	4.2%	5.0%
Hispanic or Latinx	7.6%	7.1%	6.3%
White	55.4%	57.5%	59.3%
Other, Including not Disclosed	1.9%	2.4%	1.9%
<b>Total number of US employees</b>	<b>462</b>	<b>424</b>	<b>378</b>

<sup>1</sup>Our Global Management Team includes employees based outside of the United States who have consented to disclosing the race/ethnicity that they self-identify with in this ESG Report.

## Our human capital strategy focuses on “investing in success.”

### Human capital development

We invest in the success of our employees in order to invest in the long-term success of the Company. Our human capital strategy includes attracting and retaining top talent, fostering their growth and development by creating a learning environment where employees have access to education and growth opportunities. Our Compensation and Talent Committee takes an active role in overseeing our efforts in this area.

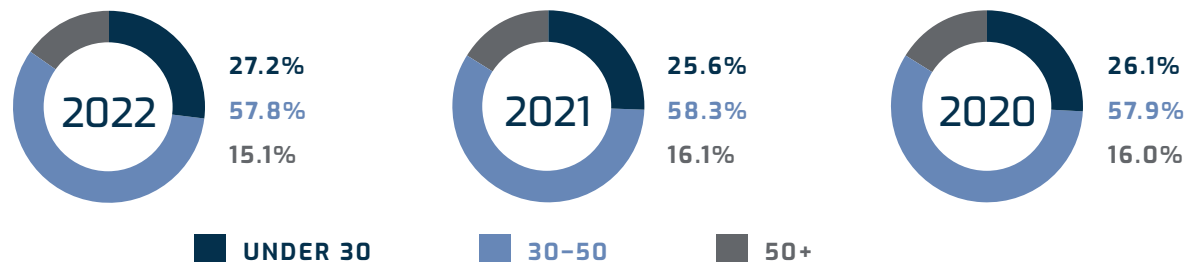
#### Investing in attracting and retaining top talent

We seek to employ a world-class, global group of professionals. We compete for talent, especially in the technology space, with some of the most recognizable brands in the world.

**DURING 2022,  
WE ONBOARDED**

**207**  
EMPLOYEES

#### Workforce by age (global)



The data below summarize our new hire and turnover data over the last three years:

New Hires	2022	2021	2020
<b>NUMBER</b>			
Male	155	117	85
Female	52	45	30
<b>Total</b>	<b>207</b>	<b>162</b>	<b>115</b>
<b>PERCENTAGE</b>			
Male	74.9%	72.2%	73.9%
Female	25.1%	27.8%	26.1%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

Turnover	2022	2021	2020
<b>VOLUNTARY</b>			
Male % of total employees	12.0%	8.0%	4.8%
Female % of total employees	3.5%	1.8%	1.7%
<b>% of employees</b>	<b>15.5%</b>	<b>9.8%</b>	<b>6.4%</b>
<b>INVOLUNTARY</b>			
Male % of total employees	2.2%	2.8%	1.7%
Female % of total employees	1.1%	1.0%	1.2%
<b>% of employees</b>	<b>3.2%</b>	<b>3.8%</b>	<b>2.8%</b>
<b>TOTAL TURNOVER % EMPLOYEES</b>	<b>18.7%</b>	<b>13.6%</b>	<b>9.2%</b>

# Investing in growth and advancement

Our performance management program is designed to enhance the job performance and professional growth of all of our employees. While informal feedback is frequent and encouraged at MarketAxess, we require two formal, written performance evaluations be provided to each full-time and part-time employee every year. Each employee formally meets with their manager twice annually to review their written assessments and performance ratings, which are recorded in our performance management system. These reviews are a key contributor to how an employee's incentive compensation and base salary increases are determined. These reviews are also important factors for considerations of promotions, relocations, and internal job transfers.

In 2022, we further integrated our culture by incorporating our values and leadership expectations into our annual goal setting and compensation discussions to ensure that performance and compensation are tied to employees demonstrating our culture. The values at right are applicable to all of our employees and the leadership expectations are the actions and mindsets required of our managers in order to give us a competitive advantage, uphold our culture and create an environment for our talent to thrive. Managers, in particular, play a critical role in protecting our culture by attracting, retaining, and developing the best talent.

## VALUES



### We collaborate.

When we collaborate with partners, co-workers, and clients from different backgrounds, experiences, and cultures, magic happens. That's diversity at work. That's collective intelligence at work. That's how we build trust. And that's how we win.



### We imagine.

Reinventing the way markets work to create more opportunity for all is our collective goal. We think beyond today's reality and strive to be better at what we do. We look at things from different angles and constantly challenge the status quo. That's how we give creativity oxygen.



### We are transparent.

Markets need transparency to thrive. And so does innovation. But it doesn't just happen. We make it happen. By being open and authentic. And by holding ourselves accountable. Perfection isn't always possible, but integrity is.



### We are tenacious.

Improving how the world's markets work is incredibly rewarding. But it takes relentless perseverance. That's why we keep striving for the right answers, not just the obvious ones. That spirit shows up in the bold pursuit of taking on our clients' toughest challenges. We roll up our sleeves and get it done.



### We are agile.

Progress doesn't happen in a straight line. It has ups and downs, zigs and zags. So we stay nimble and focused, ready to invent and reinvent solutions for our clients. We learn from our successes and our setbacks, as we keep moving on to the next challenge.



### We have integrity.

We follow the letter and spirit of the many laws applicable to our business, while breaking the status quo. We hold ourselves to the highest standards of ethical business conduct and operate with honesty and integrity to meet our commitments to the financial institutions, communities, employees and shareholders who depend on us to open global markets.

## Leadership expectations

- **You Inspire.** People follow you, because they trust and respect you. You articulate a clear vision about where you are headed and why, and you make sure everyone knows the integral role they play and how they can grow with you. You are a culture carrier and embody our values through your words and actions.
- **You Foster Highly Effective Teams.** You are a leader who is committed to building a diverse and inclusive team. You listen to all voices, creating an environment where people feel comfortable sharing ideas. You use constructive debate to unleash creativity and innovation and increase collaboration across the firm.
- **You Unlock Potential.** You coach, motivate and develop others. You know when you need to teach someone, when you need to guide, and when you need to step back and let that person find their own way. You are transparent and give feedback in the spirit of improvement, using the right words so everyone can improve and excel. You give people room to try new things and provide feedback and coach along the way.
- **You Show Courage.** You stand up for what is right when it comes to your people, clients and shareholders. You are tenacious and willing to act. You take on difficult decisions and constructively challenge the status quo. You hold yourself accountable for your actions and outcomes. By having the courage to be honest with yourself and others, you model our culture and set an example for others.
- **You Make an Impact.** You bring your expertise, perspective, and skill to your team, and the company overall, each day. You think globally and put 'we' before 'I.' You are part of the solution, proud of what you do, and willing to be a changemaker — all while leading your team to success.

The annual cash incentives for our Global Management Team, and our Named Executive Officers specifically, are discussed in greater detail in our annual proxy statement. Generally, all of our employees receive base salaries and annual variable compensation, with more senior employees receiving a higher percentage of their compensation in the form of variable cash and long-term equity incentives. We believe that this is important to align our employees' success with the long-term strategic growth of the Company.

In 2022, we enhanced the performance management process to further reflect our commitment to employee development. As part of this process, all employees are required to create goals related not only to the work they will deliver, but also for their personal development. In addition, we encourage more frequent, informal development check-ins between employees and managers throughout the year and in between formal evaluation periods.

We are committed to positioning MarketAxess for further growth through ongoing talent management, succession planning and the deepening of our leadership bench. In 2022, we identified critical roles throughout the organization and built short- and long-term succession plans for our Global Management Team. We also evaluated the Company's formal learning and development and talent acquisition initiatives in order to ensure that our employees have the skills, capabilities, and experience to effectively lead our existing, and future, global business. We believe that these plans will enable us to grow talent from within the Company.



## Investing in learning and development

As part of the bi-annual formal written review process, each full- and part-time employee creates professional development goals that are discussed and agreed upon with their manager.

Investing in development for our employees is crucial to our success and ability to attract and retain the best talent in our industry. Our goal is to deliver the right content at the right time and in the right way to every employee. We know that learning and development happen in a number of ways. MarketAxess employees learn on-the-job, through collaboration, and through formal programs.

In addition to required cybersecurity, privacy, and compliance training, we support learning and development at the firm-wide level, for individual business teams, and to grow key talent whom we believe may assume broader or more complex roles within MarketAxess in the future. We also provide training related to our ethics policies to all employees, as well as required trainings to our employees that are registered representatives with FINRA.

In 2022, we increased the level of investment in learning and development for all of our employees. We launched a centralized learning management system that allows all of our employees to access learning resources. This system allows our employees to use both on-demand and live learning content to learn what they want, when they want. These programs and resources support key skill development in the areas of communications, interpersonal skills, personal and career growth, leadership & management, critical thinking, and personal productivity. We also provide business-specific learning opportunities to employees across the organization that provide technical, markets-related, and product management skills.

Currently, we offer a customized management training program for new managers and an accelerated leadership program for our more seasoned leaders who we believe may assume broader or more complex roles within the Company in the future. We offer a range of live and on-demand technical, markets-related, product management and professional skills development to all employees globally to enable employees to develop a broad spectrum of skills and continue their career growth at MarketAxess.

In 2022, we spent approximately \$850 per employee to develop their professional development and leadership skills. Over 50% of the employee population participated in at least one live and/or on-demand learning event in 2022 in addition to the Company's required trainings. We conduct participant surveys after all of our live offerings and use that data to inform program design and our overall learning strategy.

We also provide tuition assistance for eligible employees pursuing a college degree or other outside degree program.

## Employee health & well-being

The health and safety of our employees is of paramount importance to the Company. While the COVID-19 pandemic had less of an effect on our business in 2022, we continued to consider the health and welfare of our employees as a top priority. Below is a summary of our wellness programs.

## Benefit programs

We offer competitive benefits programs to employees in all regions for healthcare-related wellness and financial wellness. In addition to comprehensive medical, dental, and vision plans, and disability programs, we offer various vehicles for saving for the future. From our US 401(k) and European pension plan employer matches, to online and on-site financial planning seminars sponsored by firms such as Fidelity Investments and Charles Schwab, we help our employees navigate their financial well-being. All US, UK, and Singapore employees are eligible to participate in our Employee Stock Purchase Program (ESPP), which was re-designed and approved by our shareholders in 2022.

We believe that we have a progressive view of "wellness." Our stipend of approximately \$1,000 may be used for traditional fitness expenses like gym memberships and purchases of fitness equipment, but may also be used to cover other "wellness" expenses like pet insurance or purchasing standing desks or ergonomic chairs for working from home.

We also have generous paid time off policies, including up to twenty-five paid vacation days per year, paid sick leave that can be used for our employees or to care for their loved ones, and personal days. After every five years of service, employees are entitled to an additional two weeks of paid vacation leave as a service recognition award.

**\$1,000  
per year**

ALL EMPLOYEES ARE ELIGIBLE  
FOR A WELLNESS STIPEND OF  
APPROXIMATELY \$1,000 PER YEAR

## Mental health

We believe that supporting our employees' mental well-being is as important as their physical well-being. We offer a wide variety of internal and external resources available on our intranet site. For example, our US and UK employees have access to traditional mental health resources through our health insurance programs, on-demand telemedicine doctors, emotional support help lines, and an app that provides on-demand assistance with stress, anxiety, and depression. Similar programs and benefits are available to our employees globally.

Number of primary caregivers who took paid childcare leave

	2022	2021	2020
Number of primary caregivers who took paid childcare leave	9	4	6
Number of primary caregivers who returned after leave ended	8 <sup>1</sup>	4	6
Number of primary caregivers who remained employees 12 months after they returned	N/A	4	6
Number of non-primary caregivers who took paid childcare leave	12	14	3
Number of non primary caregivers who returned after leave ended	12	14	3
Number of non primary caregivers who remained employees 12 months after they returned	N/A	10	3

Number of primary caregivers who returned after leave ended

Number of primary caregivers who remained employees 12 months after they returned

Number of non-primary caregivers who took paid childcare leave

Number of non primary caregivers who returned after leave ended

Number of non primary caregivers who remained employees 12 months after they returned

<sup>1</sup>One of the nine primary caregivers who took paid childcare leave in 2022 is still on leave as of the date of this ESG Report.

## Office space

Our headquarters at Hudson Yards in New York City was designed with input from our employees to include break-out spaces, standing desks, free snacks, lunch stipends and food delivery, and spaces for social events. A similar philosophy was used in the redesign of our London office. Through the business programs at Hudson Yards, employees have access to world-class on-site medical care.

## Family care

One of our human capital strategies is to create and maintain a talented workforce. We believe that taking care of an employee and their family's physical and mental health is a critical component to fostering a top work environment, which in turn helps attract, and maintain a healthy and highly successful workforce. For example, through the business programs at Hudson Yards, employees have access to back-up childcare and elder care, which is eligible for reimbursement through our \$1,000 annual wellness stipend.

In the US, we also offer best-in-class paid childcare leave following the birth, adoption, or foster care placement of a child. For primary caregivers, we offer fourteen weeks of fully paid bonding leave per childbirth, adoption, or foster care placement. For non-primary caregivers, we offer eight weeks of fully paid bonding leave of childbirth, adoption, or foster care placement. We also offer an additional six to eight weeks of fully paid disability leave for birth parents. Childcare leave policies in our other global jurisdictions also reflect local market practices and regulations. The table above reflects childcare leave taken by our US employees.



## Product design & lifecycle management

In order to help our institutional investor and broker-dealer clients meet their ESG goals and strategies, we have begun to develop ESG-integrated product offerings.

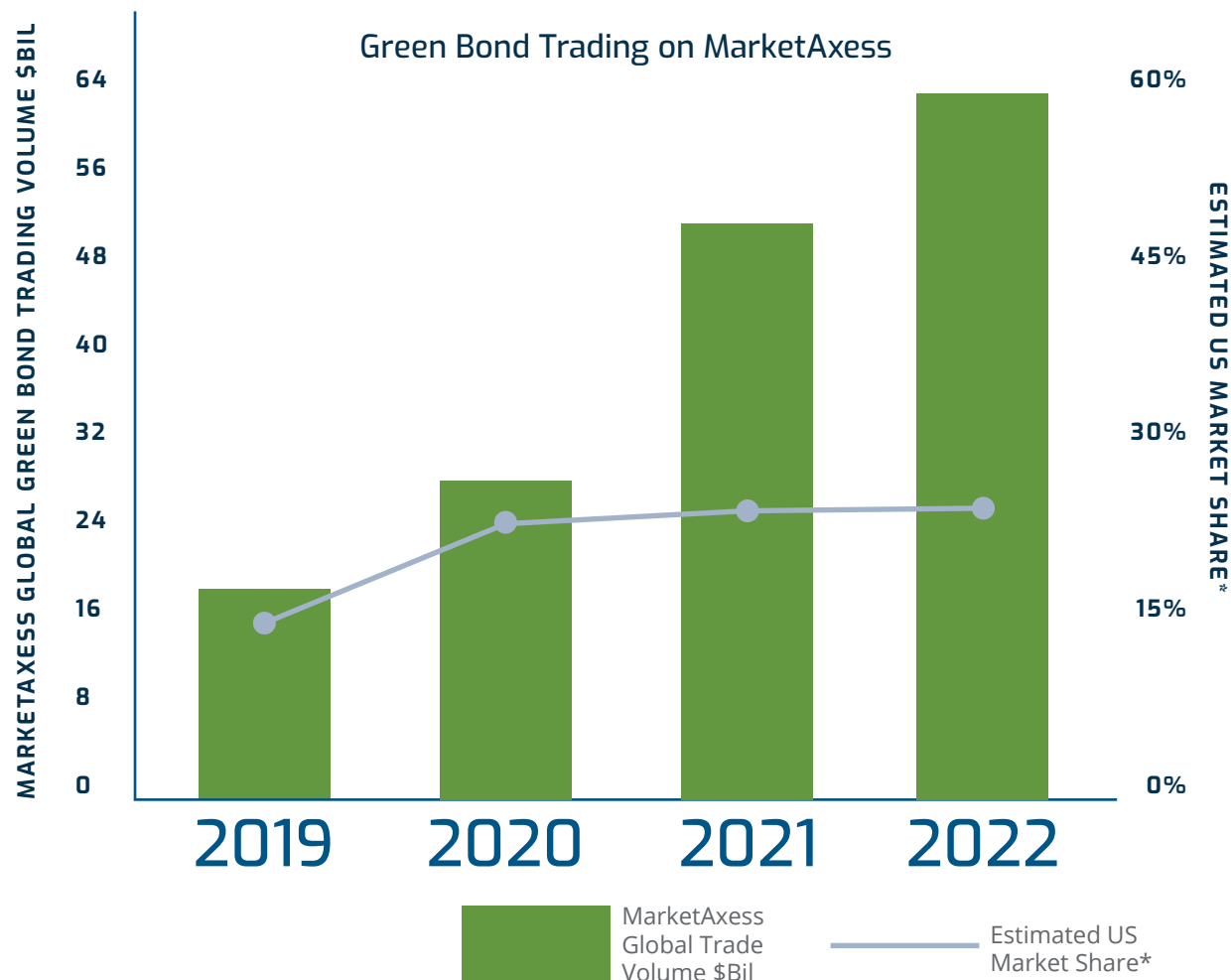
In 2021, we launched the Diversity Dealer Initiative (DDI) to enable buy-side firms to trade more easily with minority-, women-, and veteran-owned broker-dealers, while still achieving best execution. The DDI leverages our anonymous all-to-all Open Trading marketplace and provides enhanced trading connections by allowing institutional investor clients to select a diversity dealer to intermediate an Open Trading transaction.

In addition, in 2019 we launched our “Trading for Trees” program, under which five trees are planted by One Tree Planted, our partner charitable organization, for every \$1 million of green bond trades executed on our platforms.

In 2022, \$63.3 billion in corporate and municipal green bond trading volume was executed globally on MarketAxess, an increase of 24.0% from 2021. In the US, where public data is available, we believe that MarketAxess ranks as the largest electronic corporate and municipal green bond marketplace with an estimated market share of 21.4% in TRACE-reported corporate and municipal green bond volume.

The fourth year of our “Trading for Trees” initiative proved successful. Our clients’ green bond trading on the MarketAxess platform resulted in over 316,000 trees being planted across the world, including Thailand, Ghana, India, Ireland, Denmark, Romania, US, Canada, and Chile. The impact of our projects was focused on wildfire restoration and enhanced biodiversity, and provided local communities with resources to fight hunger and climate change.

This growth reflects our clients’ focus on sustainable investing strategies and our commitment to help provide them with the best functionality to support those strategies. We continue to evaluate the usage of green bond volumes on our trading platform to ensure we have the functionality that makes it easier for clients to identify and access liquidity in green bonds.



\*Estimated MarketAxess share of corporate and municipal green bond trading by dollar volume reported to TRACE.

## Community relations

In the last year, we have continued to expand our community involvement through philanthropic and community partnerships through the MarketAxess Charitable Foundation as well as volunteer opportunities for MarketAxess staff.

### MarketAxess Charitable Foundation

The Charitable Foundation's mission is to work with organizations that support underserved communities, with an emphasis on youth education, equality, diversity, and inclusion. Our aim is to use the Foundation to help shape the future of financial technology by creating opportunities for today's youth in the fields of software development and finance. Our goal is to develop long-lasting relationships that provide opportunities for growth, both in terms of corporate involvement and employee participation. The Charitable Foundation is recognized as a 501(c)(3) organization by the US Internal Revenue Service.

In addition to our corporate donations through the MarketAxess Charitable Foundation, we also offer an employee charitable gift matching program of up to \$2,000 per employee per year.

#### THINKING GLOBALLY

The Charitable Foundation has extended its commitment to emerging markets communities through a global partnership with EMpower — The Emerging Markets Foundation, a philanthropy dedicated to helping lift marginalized young people in emerging market countries out of poverty. Since the partnership began in 2017, MarketAxess and our Charitable Foundation has contributed over \$200,000 in total to EMpower, supporting their work in 15 emerging market countries where they partner with over 100 local organizations, providing young people with the tools to live safe and productive lives. This year, to run alongside the World Cup games, we partnered with EMpower to launch our own soccer-based competition, the EM Axess Cup, bringing further awareness to our institutional investor and broker-dealer clients of vulnerable youth in emerging market countries, including a donation of \$25,000.

#### RESPONDING TO CRISIS

While the Charitable Foundation directed focus on strengthening existing local and global partnerships, we also built relationships with new partners in need.

In 2022, the Charitable Foundation focused on the crisis in Ukraine and rallied to support the global Red Cross/Red Crescent response. Our Charitable Foundation matched donations from our Board of Directors, employees and management, resulting in a collective donation of approximately \$125,000 to the International Red Cross and Red Crescent Movement to aid those in Ukraine and neighboring countries. This donation was aimed at assisting people and communities directly impacted by the conflict through food, clothing, water donations, and supplying shelter and mental health support.

In 2022, we also continued our partnerships with City Harvest, PENCIL and IntoUniversity and provided grants to new partners such as Friends of the High Line, National MS Society, The Cyclists Alliance, and The Robin Hood Foundation.

In 2022, the MarketAxess Charitable Foundation made approximately

# \$420,000

**IN DONATIONS TO  
OUR PARTNERS**

## Volunteerism

Volunteerism is a long-standing part of the MarketAxess culture, where we provide different opportunities for our employees to give back. All employees have up to two paid days a year for volunteering and we encourage volunteering with the organizations that the Charitable Foundation supports.



In 2022, 17 of our New York employees took to the streets of New York City and participated in a 30-mile Bike MS ride to benefit Multiple Sclerosis through the National MS Society. MarketAxess also donated to the cause and helped outfit our team in MarketAxess uniforms.



The Holidays can be a time of struggle for so many and this year, in partnership with The Robin Hood Foundation, we made the season a little brighter for New Yorkers in need through a holiday gift drive to benefit local families.



We hosted a group of IntoUniversity students at our London office for a dynamic and competitive business simulation. This was a high impact, one day opportunity for our employees to support a group of students in completing a number of fast-paced tasks, meetings, debates and pitches, creating their own business idea and selling it to potential investors. This workshop gave the students 'hands on' insight into the world of work, within a real business challenge environment, and supported them to develop crucial soft skills such as teamwork, leadership, and communication skills.



# Environment

## Water usage

Water is becoming a scarce resource in many locations around the globe and water management is a priority for MarketAxess. Three MarketAxess locations fall within High Baseline Water Stress regions and one is located within an Extremely High Baseline Water Stress regions. 53.2% of our employees are based in our Hudson Yards headquarters, which is located in a Low Baseline Water Stress Region. All of MarketAxess offices comply with local water laws and regulations. Beyond compliance, some of our offices have had an increased focus on water efficiency and conservation by technology such as utilizing hands-free faucets, toilets, and water fill stations to limit water usage.

## Hudson Yards

With respect to our leased office spaces, our headquarters located at 55 Hudson Yards in New York City is a LEED Gold-designed building that offers expansive views with floor to ceiling windows, maximizing the interior light. The building's LEED Certification was a major factor in the decision to select 55 Hudson Yards as our new headquarters in 2019. Numerous features of our 55 Hudson Yards office are designed to reduce tenants' carbon footprint, including water-efficient design, automatic lighting sensor controls, and renewable energy use. Additionally, the building in which our London office is located is BREEAM-certified, which is the dominant sustainability assessment method for buildings in the UK.

## Data centers

Data centers can have a tremendous environmental impact due to the volumes of electricity required to operate. We utilize the next-generation data centers that leverage the latest environmentally friendly technologies and renewable energy sources. Two of our three US data centers have a LEED Certification rating level of Silver, meeting rigorous environmental and energy management systems standards. Our data center provider procures 100% of the electricity consumed at these data centers from renewable sources.

Our materiality assessment identified *Energy Management*, *GHG Emissions*, *Waste Reduction* and *Water Usage* as Tier 3 topics. We acknowledge that communities and businesses across all industries face increasing risks from the effects of climate change and we support the Paris Agreement under the United Nations Framework Convention on Climate Change.

In 2022, we first responded to the Climate Disclosure Project's climate change questionnaire and in this Report, we are including reporting against the TCFD framework in order to give our stakeholders more information into our climate change practices and policies.

## GHG Emissions

### 2022 performance

The table below includes global data for MarketAxess' office space and data centers for the reporting period January 1, 2022, through December 31, 2022.

	GROSS EMISSIONS (MT CO <sub>2</sub> E)
Scope 1	172.3
Scope 2 (market-based)	608.25 <sup>1</sup>
Scope 2 (location-based)	611.27 <sup>1</sup>
Scope 3 (Category 1 – Purchased Goods and Services <sup>2</sup> )	132.9
Scope 3 (Category 6 – Business Travel)	220.1
Scope 3 (Category 7 – Employee Commuting)	1,433.9

<sup>1</sup> See "Version 2" on page 44

<sup>2</sup> This category was limited to IT assets, which includes laptops and desktops.

# SASB index

CATEGORY	ACCOUNTING METRIC	CODE	2022 DISCLOSURE
Security & Commodity Exchanges	(1) Number and (2) average duration of (a) halts related to public release of information and (b) pauses related to volatility	FN-EX-410a.1	Not applicable. We are not an exchange, but a leading electronic trading platform that delivers greater trading efficiency, a diversified pool of liquidity, and significant cost savings to institutional investors and broker-dealers across the global fixed-income markets.
	Percentage of trades generated from automated trading systems	FN-EX-410a.2	For 2022, the percentage of automated trades was 7.2% of volume and 18.2% of trade count.
	Description of alert policy regarding timing and nature of public release of information	FN-EX-410a.3	Not applicable. See FN-EX-410a.1.
	Description of policy to encourage or require listed companies to publicly disclose environmental, social, and governance (ESG) information	FN-EX-410a.4	Not applicable. See FN-EX-410a.1.
	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	FN-EX-510a.1	MarketAxess had zero such monetary losses.
	Discussion of processes for identifying and assessing conflicts of interest	FN-EX-510a.2	<p>The Board of Directors has adopted a <a href="#">Code of Conduct</a> that applies to all officers, directors, and employees, and a <a href="#">Code of Ethics for the Chief Executive Officer and Senior Financial Officers</a>, which includes our Chief Financial Officer.</p> <p>The Code of Conduct provides for the ethical handling of conflicts and clearly sets out the process by which conflicts of interest are identified, reported to, and managed by, members of management, and in certain instances, the Audit Committee of the Board of Directors. For additional information, please see our Code of Conduct and the Code of Ethics for the CEO and Senior Financial Officers on our website.</p> <p>In addition, the Governance Committee of the Board of Directors is responsible for maintaining appropriate conflict of interest policies and procedures and the Audit Committee of the Board of Directors is responsible for reviewing and approving transactions with our related parties, as defined by applicable rules of the Securities and Exchange Commission.</p>

CATEGORY	ACCOUNTING METRIC	CODE	2022 DISCLOSURE
Security & Commodity Exchanges, cont'd	(1) Number of significant market disruptions and (2) duration of downtime	FN-EX-550a.1	<b>Metrics for 2022:</b> Number of significant market disruptions: 0 Duration of downtime: N/A
	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	FN-EX-550a.2	Except as required by law, MarketAxess does not disclose this information. We are not immune from cyber-attacks or attempted data breaches, but we have not experienced any material information security breaches in the last three years.
	Description of efforts to prevent technology errors, security breaches, and market disruptions	FN-EX-550a.3	Executive management and the MarketAxess Board of Directors cooperate to oversee mechanisms that protect our technologies and the customers who rely on us. MarketAxess' Board and the Board Risk Committee assist MarketAxess' executive management team in its efforts to define the risks facing the Company, formulate risk management policies and procedures, and manage risk exposures on an ongoing basis. MarketAxess has a Global Chief Risk Officer who prepares updates and reports for the Global Management Team and the Board and assists in developing programs to identify and control risks.  For additional information, please see our <a href="#">Information Security Policy Statement</a> on our website.
Professional & Commercial Services	Description of approach to identifying and addressing data security risks	SV-PS-230a.1	MarketAxess prioritizes security throughout our platforms, operations, and software development. We make architectural, design, and implementation choices to structurally address security risks, such as logical and physical access controls, perimeter firewall protection, and embedded security processes in our systems development lifecycle. Our cybersecurity program is based on the National Institute of Standards and Technology Cyber Security Framework, which consists of standards, guidelines, and best practices to manage cybersecurity-related risks and promote the protection and resilience of critical infrastructure. Our Global Chief Information Security Officer leads a cybersecurity team in assessing, managing, and reducing the relevant risks with a goal to assure critical operations and continuous delivery of service. We constantly monitor connectivity and suspect events are escalated to our global risk and management teams.  For additional information, please see our <a href="#">Information Security Policy Statement</a> on our website.
	Description of policies and practices relating to collection, usage, and retention of customer information	SV-PS-230a.2	MarketAxess protects the confidentiality of our customers. We strive to protect sensitive information through various means. These include physical security, technical safeguards, procedural requirements and policies, and a program of monitoring to detect and address unauthorized modification or misuse. We have an established process for conducting risk-based privacy assessments in order to comply with applicable MarketAxess policies and regulatory requirements. Our customer agreements include provisions addressing the usage and protection of customer confidential information. Please also see our <a href="#">Privacy Policy</a> on our website, which provides a detailed description of our procedures for the collection and handling of personally identifiable information.

CATEGORY	ACCOUNTING METRIC	CODE	2022 DISCLOSURE																																				
Professional & Commercial Services, cont'd	(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI) or personally identifiable information (PII), (3) number of customers affected	SV-PS-230a.3	See FN-EX-550a.2.																																				
	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	SV-PS-330a.1	<div><div><div>Gender Representation as of December 31, 2022 (Global)</div><table><thead><tr><th></th><th>Female</th><th>Male</th></tr></thead><tbody><tr><td>Board</td><td>30.8%</td><td>69.2%</td></tr><tr><td>Global Management Team</td><td>23.1%</td><td>76.9%</td></tr><tr><td>All Other Employees</td><td>27.8%</td><td>72.2%</td></tr></tbody></table></div><div><div>Race/Ethnic Representation as of December 31, 2022 (US)</div><table><thead><tr><th></th><th>Asian</th><th>Black/ African American</th><th>Hispanic/ Latinx</th><th>White</th><th>Other</th></tr></thead><tbody><tr><td>Board</td><td>7.7%</td><td>7.7%</td><td>0.0%</td><td>84.6%</td><td>0.0%</td></tr><tr><td>Global Management Team</td><td>15.4%</td><td>0.0%</td><td>0.0%</td><td>84.6%</td><td>0.0%</td></tr><tr><td>All Other Employees</td><td>30.3%</td><td>5.3%</td><td>7.7%</td><td>54.6%</td><td>2.0%</td></tr></tbody></table><div>1 Our Global Management Team includes employees based outside of the United States, who have consented to disclosing the race/ethnicity that they self-identify with in this ESG Report.</div></div></div>		Female	Male	Board	30.8%	69.2%	Global Management Team	23.1%	76.9%	All Other Employees	27.8%	72.2%		Asian	Black/ African American	Hispanic/ Latinx	White	Other	Board	7.7%	7.7%	0.0%	84.6%	0.0%	Global Management Team	15.4%	0.0%	0.0%	84.6%	0.0%	All Other Employees	30.3%	5.3%	7.7%	54.6%	2.0%
		Female	Male																																				
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All Other Employees	30.3%	5.3%	7.7%	54.6%	2.0%																																		
(1) Voluntary and (2) involuntary turnover rate for employees	SV-PS-330a.2	<div><div>Type of Separation</div><div>Turnover Rate (Percentage of Total Employees)</div><div>Voluntary: 15.5%</div><div>Involuntary: 3.2%</div><div>Total: 18.7%</div></div>																																					
Employee engagement as a percentage	SV-PS-330a.3	In 2022, MarketAxess completed our second firm-wide employee engagement survey, in which 86% of our employees participated. The survey was conducted by Willis Towers Watson ("WTW"). Based on our employees' responses, our overall employee engagement measured at 81%, which is consistent with the global averages for financial services and mid-size financial and technology companies as Reported by WTW. To conduct this survey, we presented questions and statements to our employees related to the following categories: Sustainable Engagement, Senior Leadership, Goals and Objectives, Innovation, Efficiency, Communication, Inclusion, Customer Focus, Empowerment, Collaboration & Teamwork, Career Development, Supervision, Performance Management, Pay and Benefits, Workload and Flexibility, Return to Office and Pandemic Management, Purpose, Vision and Values and Retention. There were also two open comment questions.																																					

CATEGORY	ACCOUNTING METRIC	CODE	2022 DISCLOSURE
Professional & Commercial Services, cont'd	Description of approach to ensuring professional integrity	SV-PS-510a.1	The MarketAxess <a href="#">Code of Conduct</a> provides for the ethical handling of conflicts and sets out the standards we expect our employees to follow. It provides MarketAxess employees with guidelines for areas of ethical risk in order to foster a culture of honesty and accountability, including guidance to employees to help them recognize and deal with ethical issues and mechanisms to report unethical conduct. It is the Company's policy to make full, fair, accurate, timely, and understandable disclosure in the reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company. We also conduct training for employees on the importance of confidentiality and all employees are required to maintain the confidentiality of all information entrusted to them. The Company maintains a hotline for employees, customers, suppliers, or other interested parties to report concerns or issues, anonymously and confidentially.
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	SV-PS-510a.2	MarketAxess had zero such monetary losses.
Software & IT Services	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	TC-SI-130a.1	(1) 2,783.5 MWh = 10,020.6 GJ; (2) 100%; (3) 0%.
	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	TC-SI-130a.2	MarketAxess has not measured the requested data.  Three MarketAxess locations fall within High Baseline Water Stress regions and one is located within an Extremely High Baseline Water Stress regions. 53.2% of our employees are based in our Hudson Yards headquarters, which is located in a Low Baseline Water Stress Region.
	Discussion of the integration of environmental considerations into strategic planning for data center needs	TC-SI-130a.3	MarketAxess currently utilizes three data centers. Our data center provider procures 100% of the electricity consumed at these data centers from renewable sources. We are in the process of transitioning to a more cloud-centric data environment, but will still maintain some of our existing data centers. Our chosen cloud provider has committed to powering their operations with 100% renewable energy by 2025.
	Description of policies and practices relating to behavioral advertising and user privacy	TC-SI-220a.1	We place the highest importance on respecting and protecting the privacy and confidentiality of the information that our customers share with us. Please see our <a href="#">Privacy Policy</a> on our website, which provides a detailed description of our procedures related to user privacy.  We do not conduct behavioral advertising.
	Number of users whose information is used for secondary purposes	TC-SI-220a.2	We do not sell user information to third parties or use such data for secondary purposes.

CATEGORY	ACCOUNTING METRIC	CODE	2022 DISCLOSURE
Software & IT Services, cont'd	Total amount of monetary losses as a result of legal proceedings associated with user privacy	TC-SI-220a.3	MarketAxess had zero such monetary losses.
	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	TC-SI-220a.4	In the ordinary course of business, MarketAxess receives and responds to requests from its regulators that request information related to trading patterns.
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	TC-SI-220a.5	None.
	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	TC-SI-230a.1	See FN-EX-550a.2.
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	TC-SI-230a.2	<p>Please see our <a href="#">Information Security Policy Statement</a> on our website.</p> <p>MarketAxess' Information Security Management Systems are compliant with ISO/IEC 27001:2013 standards. Our <a href="#">ISO/IEC 27001:2013 certification</a> is available on our website.</p> <p>We have a Chief Information Security Officer ("CISO") and a dedicated Security Team responsible for maintaining the security and integrity of our systems. The CISO provides regular reports to MarketAxess' Global Management Team and the Board of Directors. The Security Team delivers training and education to our global employees regarding security best practices and employees are required to complete security awareness training annually. Also, the Security Team regularly engages third parties to conduct security assessments and penetration tests.</p>
	Percentage of employees that are (1) foreign nationals and (2) located offshore	TC-SI-330a.1	<p><b>Type of Employee</b></p> <p><b>Percentage of Total Employees</b></p> <p>Foreign Nationals: 7.9%</p> <p>Located Offshore: 38.2%</p>
	Employee engagement as a percentage	TC-SI-330a.2	See SV-PS-330a.3.
	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	TC-SI-330a.3	See SV-PS-330a.1.
	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	TC-SI-520a.1	MarketAxess had zero such monetary losses.

CATEGORY	ACCOUNTING METRIC	CODE	2022 DISCLOSURE
Software & IT Services, cont'd	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	TC-SI-550a.1	Please see our response to FN-EX-550a.1 for service disruption and downtime information relevant to our business.
	Description of business continuity risks related to disruptions of operations	TC-SI-550a.2	<p>MarketAxess is committed to meeting client and regulatory requirements and stakeholder expectations, including in instances when business disruption occurs. Accordingly, MarketAxess maintains a Business Continuity Management Policy with frameworks for identifying, assessing, managing, monitoring, and reporting risks that could prevent MarketAxess from performing key operational activities; meeting client and regulatory obligations; and/or addressing activities that could significantly impact the integrity of the market. The Business Continuity Management Policy outlines the mandates and minimum requirements that business units must follow to plan for and respond to disruptive events. Business continuity is underpinned by processes and procedures to help ensure the stability of our technology environments. The disaster recovery procedures ensure compliance with client contracts and internal standards. Cybersecurity policies, protocols, and assessments are designed to protect sensitive information and enable effective response to cyber or security threats. Our programs are designed to create a resilient operating environment with preplanned response and recovery strategies in the event of business disruption. These strategies focus on safeguarding our people, assets, information, and clients.</p> <p>For more information on risks related to business continuity as well as the COVID-19 pandemic's effect on the company's business continuity, please see "Risk Factors—Technology, IT Systems and Cybersecurity Risks—Systems failures, interruptions, delays in service, catastrophic events and resulting interruptions in the availability of our trading platforms could materially harm our business and reputation" and "Management's Discussion and Analysis—Critical Factors Affecting Our Industry and Our Company—Economic, Political and Market Factors" in our <a href="#">Annual Report on Form 10-K</a>. The Company has also published a <a href="#">Business Continuity Plan Disclosure</a> on our website.</p>

CATEGORY	ACTIVITY METRIC	CODE	2022 DISCLOSURE
Security & Commodity Exchanges	Average daily number of trades executed, by product or asset class	FN-EX-000.A	<b>2022 Average Daily Trades</b> Total Credit: 27,376 Total Rates: 29,107 Grand Total: 56,483
	Average daily volume traded, by product or asset class	FN-EX-000.B	<b>2022 Average Daily Volume</b> Total Credit: \$11.8 billion Total Rates: \$21.9 billion Grand Total: \$33.7 billion MarketAxess publishes reports on our trading volumes on our website.
Professional & Commercial Services	Number of employees by: (1) full-time and part-time, (2) temporary, and (3) contract	SV-PS-000.A	<b>Type of Employee and Number of Employees</b> Full-time & Part-time: 738 Temporary <sup>1</sup> : 4 Contract <sup>2</sup> : 6 Total: 748 <sup>1</sup> Temporary employees are excluded from total employees in other employee statistics in this ESG Report. <sup>2</sup> Contract employees are fixed term contracted employees in the United Kingdom and included as full-time and part-time, as applicable, elsewhere in this ESG Report.
	Employee hours worked, percentage billable	SV-PS-000.B	Not applicable. MarketAxess does not bill clients hourly.

# TCFD index

## GOVERNANCE

Recommendation	
Describe the Board's oversight of climate-related risks and opportunities.	<p>The Governance Committee oversees and periodically reviews and assesses the Company's ESG strategy and initiatives and makes recommendations to the Company to further its ESG goals, including climate-related issues. The Governance Committee continues to be updated on our progress towards managing our carbon footprint.</p> <p>The Governance Committee meets periodically. Climate-related issues are a scheduled agenda item as important matters arise. The Governance Committee met four times in 2022. The duties of the Committee include monitoring progress of the Company's ESG initiatives and performance regarding, among other things, climate change, environmental protection and sustainability to ensure that such initiatives and performance are consistent with the Company's long-term strategic objectives and good corporate citizenship.</p> <p>Our directors regularly engage in director education programs in order to keep current with trends affecting our industry and the overall economy, including climate change.</p>
Describe management's role in assessing and managing climate-related risks and opportunities.	<p>In 2022, the Company's ESG framework and initiatives, including those related to climate change, are jointly overseen by the Company's Chief Executive Officer (the "CEO") and General Counsel and Corporate Secretary (the "GC"). Both the CEO and the GC are executive officers of the Company and sit on our Global Management Team. The Company thinks of its ESG strategy as one that encompasses both corporate and commercial objectives. The corporate initiatives, such as the preparation of the ESG Report and measurement of greenhouse gas emissions, are generally overseen by the GC, whereas the commercial objectives, such as our "Trading for Trees" program are overseen by the CEO.</p> <p>The corporate aspects of the Company's ESG strategy, including the publication of our annual ESG Report, the supervision of the Company's carbon footprint measurement project and the completion of the Company's CDP Climate Change questionnaire is primarily managed by an Assistant General Counsel (the "AGC") under the direct supervision of the GC. The responsibilities for climate-related corporate strategy have been assigned to the AGC under the supervision of the GC because of their involvement in the Company's overall corporate governance strategy and their developing expertise in climate-related regulations.</p> <p>The commercial aspects of the Company's ESG strategy, including the Company's "Trading for Trees" green bond program, is managed by a cross functional team, including marketing, technology and sales professionals under the supervision of the CEO. The responsibilities for climate-related commercial strategies have been assigned to the CEO because he is responsible for the day-to-day operations, corporate development, long-term technology strategy and global data strategy for MarketAxess globally.</p>

## STRATEGY

Recommendation	
Describe the climate-related risks and opportunities the organization has identified over the short, medium and long term.	<p>With respect to climate-related risks only, the Company defined short-term risks as risks that may arise from 0 to 3 years, medium-term risks as risks that may arise from 3 to 10 years and long-term risks as risks that may arise in 10 or more years. MarketAxess is exposed to physical and transition-related risks arising from climate change.</p> <p><b>Physical Risks:</b></p> <p><b>Acute physical risk — Flood.</b> MarketAxess’ headquarters and its three data centers are located on the eastern coast of the United States. The increasing frequency of extreme weather events, such as floods, poses risks to other electric utility transmission and distribution networks that we rely on to power our offices and data centers. An extreme weather event effecting the eastern cost of the United States could potentially disrupt our business operations. MarketAxess considers this to be a medium-term risk, about as likely as not to occur with a low magnitude of impact.</p> <p><b>Chronic physical risk — Changing temperature.</b> Changes to average temperatures could directly result in increased operating costs for utilities. MarketAxess considers this to be a medium-term risk, unlikely to occur with a low magnitude of impact.</p> <p><b>Transitional Risk:</b></p> <p><b>Reputational risk.</b> Our reputation could be adversely impacted by our sustainability practices and ESG disclosures or investor perceptions thereof, including if we fail to establish measurable environmental goals or subsequently fail to meet any such goals..</p> <p>MarketAxess considers this to be a long-term risk, unlikely to occur with a low magnitude of impact.</p>
Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy and financial planning.	<p>Climate risks and opportunities impact our service offering and solutions we provide to our clients across the Company. As a leading electronic fixed-income trading platform, we are regularly looking for opportunities to expand our capabilities, such that we are able to more holistically advise our customers on their evolving sustainability and climate-related needs.</p> <p>We also evaluate climate related risks. For example, operational Resiliency is one of MarketAxess’ top priorities. Our goal is to maintain operational and critical functionality in the event there are disruptions to normal business conditions, including those caused by extreme weather events. As such, the Company has developed a Business Continuity Plan (“BCP”) that details how we will respond to significant disruptions to our business. Our BCP addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients prompt access to their funds and securities if we are unable to continue our business.</p>
Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	<p>The Company does not currently incorporate scenario analysis into its ESG program; however, we actively seek to incorporate environmental topics into our priority assessment.</p>

## RISK MANAGEMENT

Recommendation	
Describe the organization's processes for identifying and assessing climate-related risks.	MarketAxess' approach to identifying, assessing and managing risks, including climate-related risks forms part of our company-wide, multidisciplinary risk management process overseen by our Board. This approach may consider current and emerging regulations and legal considerations as well as reputational and physical risks.
Describe the organization's processes for managing climate-related risks.	Because our materiality assessment has determined most environmental topics as Tier 3, the Company has not incorporated specific processes to address climate-related risk. Notwithstanding, operational resiliency is one of MarketAxess' top priorities. Our goal is to maintain operational and critical functionality in the event there are disruptions to normal business conditions, including but not limited to those caused by extreme weather events. As such, the Company has developed a "BCP that details how we will respond to significant disruptions to our business, including but not limited to those related to climate change. Our BCP addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients prompt access to their funds and securities if we are unable to continue our business.
Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organization's overall risk management.	The Company follows the "three lines of defense" approach to risk management. The first line of defense is the Company's business functions that generate revenue. This line is charged with: (i) identifying, assessing, monitoring and managing the Company's risks within the Company's risk appetite limits; and (ii) identifying inherent and residual risks by process. The second line of defense is comprised of the Company's Risk and Legal and Compliance departments. This line is charged with: (i) independently assessing, quantifying and overseeing risks by the first line; and (ii) assisting risk owners in reporting risk-related information up and down the Company. The third line of defense is the Company's internal audit department. This line: (i) independently assesses and tests the effectiveness of the control processes established by the first line; (ii) independently evaluates design and effectiveness of the second line's risk management program; and (iii) provides global assurance to the Audit Committee and executive management on the effectiveness of internal controls and risk processes.

## METRICS AND TARGETS

Recommendation	
Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	As part of our commitment to environmental stewardship, we monitor our footprint across our operations. This includes our Scope 1, 2 and some categories of Scope 3 greenhouse gas emissions.
Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	Refer to page 33 of this Report for such information.
Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	MarketAxess does not currently have any climate-related targets. As we expand our greenhouse gas management process and oversight of our climate risk, we will continue to monitor opportunities for and the feasibility of target-setting. We utilize sound environmental practices and have already taken steps to improve energy efficiency and limit emissions in our workplaces.

# Cautionary note

This ESG Report includes “forward-looking statements” within the meaning of the US federal securities laws, including statements regarding our sustainability, ESG, and corporate responsibility targets, goals, strategies, impacts, programs, and other business plans, initiatives, and objectives. The policy statements discussed in this report are statements of general policy. It is possible that specific circumstances in our global operations may differ from those described herein. Any description of a policy statement contained herein does not constitute a representation of full compliance with such policy statement. Forward-looking statements are any statements other than statements of historical fact. Forward-looking statements represent our current judgment about possible future events and are often identified by words like “aim,” “anticipate,” “appears,” “approximately,” “believe,” “continue,” “could,” “designed,” “effect,” “estimate,” “evaluate,” “expect,” “forecast,” “goal,” “initiative,” “intend,” “may,” “objective,” “outlook,” “plan,” “potential,” “priorities,” “project,” “pursue,” “seek,” “should,” “target,” “when,” “will,” “would,” or the negative of any of those words or similar expressions. In making these statements we rely on assumptions and analysis based on our experience and perception of historical trends, current conditions, and expected future developments, as well as other factors we consider appropriate under the circumstances. We believe these judgments are reasonable, but these statements are not guarantees of any future events or financial results, and our actual results may differ materially due to a variety of important factors, both positive and negative, many of which are beyond our control. Factors that might cause such differences include, but are not limited to, challenges regarding the acceptance and implementation of our ESG initiatives, and a variety of economic, competitive, social, and regulatory factors, many of which are described in our Annual Report on Form 10-K for the year ended December 31, 2022, and our subsequent filings with the US Securities and Exchange Commission and can be accessed at [www.marketaxess.com](http://www.marketaxess.com). We caution readers not to place undue reliance on forward-looking statements. We expect that certain disclosures made in this ESG Report may be amended, updated or revised in the future as the quality and completeness of our data and methodologies continue to improve. Forward-looking statements speak only as of the date they are made, and we undertake no obligation to update publicly or otherwise revise any forward-looking statements, whether as a result of new information, future events or other factors, except where we are expressly required to do so by law.

## VERSION 2

Version 2 of this 2022 ESG Report was released to correct the following:

- Our Scope 2 (market-based) emissions were 608.25 MT CO<sub>2</sub>e. Previously, the 2022 ESG Report stated that they were 526.1 MT CO<sub>2</sub>e.
- Our Scope 2 (location-based) emissions were 611.27 MT CO<sub>2</sub>e. Previously, the 2022 ESG Report stated that they were 531.9 MT CO<sub>2</sub>e.



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