



## **IntercontinentalExchange, Inc. Disclosure, Corporate Communications and Social Media Policy**

### **Statement of Purpose**

IntercontinentalExchange, Inc. and its subsidiaries (“ICE” or the “Company”) are committed to a consistent disclosure and communications policy that covers all contact with the media and investment community to maintain credibility, achieve balanced coverage, develop realistic expectations and provide timely and accurate disclosure. This Disclosure, Corporate Communications and Social Media Policy (this “Policy”) will support the development and maintenance of consistent and accurate messaging by ICE and help maintain realistic investor expectations by making all required disclosures on a broadly disseminated basis as defined in Regulation Fair Disclosure (“Reg FD”), Regulation G and the rules of the NYSE. This Policy also is intended to avoid “leaks” of information by employees and inappropriate use of social media outlets, which could damage the Company’s reputation or business prospects and lead to the Company having to publicly disclose a matter before it would otherwise do so.

This Policy covers all employees and board members of the Company and its subsidiaries (collectively referred to as “employees”). It covers disclosures in SEC-filed documents, statements made in the Company’s annual, quarterly and current reports, member circulars, news and earnings releases, communication between the Company and analysts, investors and the news media, senior management speeches, social media outlets and presentations and information contained on the Company’s website and intranet communications.

### **Media Referrals and Designation of Authorized Spokespersons**

Employees must refer any media or investor inquiries and any requests for information to Kelly Loeffler or Melanie Skijus (Atlanta), Brookly McLaughlin (Chicago) or Claire Miller (London). This includes, but is not limited to, inquiries concerning ICE stock or financial performance, volume of trading or clearing, rumors, business developments, mergers or acquisitions or other material nonpublic information.

Unless authorized by the Corporate Communications department or this Policy, no employee is authorized to speak on behalf of ICE or represent that they do. The following individuals are deemed to be the “authorized spokespersons” for the Company due to their knowledge regarding the Company's performance, business plans, strategies and financial statements and have strong working knowledge of disclosure rules:

• Chief Executive Officer	• Chief Operating Officer
• Chief Financial Officer	• General Counsel
• A member of the Investor Relations / Corporate Communications department	• President of a subsidiary for matters specific to the subsidiary

All employees are prohibited from discussing or disclosing non-public or confidential information to a third party without the prior approval of the Legal department. Employees that violate this Policy will be subject to disciplinary action, up to and including termination for cause.

### **Corporate Communication Standards**

ICE follows the below standards with respect to its corporate communications:

- ICE publishes press releases for the purpose of public disclosure. Press releases should not be relied upon as a primary vehicle for marketing, although they may be part of a larger marketing strategy.
- ICE is an exchange and does not offer a perspective or prediction on market prices. However, the Company may provide names of market participants and analysts for reporters to contact for market commentary assuming permission has been granted by such parties.
- ICE protects the confidentiality of market participants. The identity, positions and activities of all market participants are confidential unless ICE has previously received permission from an individual participant to confirm some aspect of its activity in ICE markets.
- ICE does not comment on merger and acquisition-related rumors or personnel actions unless expressly provided for in a company press release or other management statement that has been approved by the Investor Relations and Legal departments.
- While ICE has no political affiliation, ICE may provide a perspective on how legislative and regulatory proposals may impact its business and markets. Any such perspectives must be reviewed and approved by the Investor Relations and Legal departments. ICE does not endorse, offer congratulations on, or provide other commentary regarding regulatory or legislative developments that may appear to raise questions about the independence or integrity of policy makers.
- To avoid the appearance of favoritism with market participants, vendors, etc., ICE does not publish joint press releases with third parties. An exception may be considered if there is a formal legal agreement between ICE and the third party.
- Filming and photography in any ICE facility is prohibited unless explicitly approved by a Vice President or Director of the Investor Relations or Communications department.
- Unless otherwise agreed to in advance by a Vice President or Director of the ICE Communications department, a member of the Communications department must be present or on the phone for all media meetings or interviews.

## **Determination of Materiality**

The spokespersons, together with Company legal counsel, the Disclosure Controls Committee or outside advisors, as appropriate, will determine whether Company information is material and whether it needs to be disclosed.

## **Responding to Rumors and Transaction Inquiries; Corrections**

It is the Company's policy to avoid commenting on market rumors, speculation and specific transaction details that are not ripe for public disclosure. The Company's spokespersons will respond to such inquiries with the following statement: "It is our policy not to comment on market rumors or speculation." In the event the Company's regulator or listing exchange requests that the Company make a more definitive statement, the CEO or CFO will make the final determination whether to do so after consulting with Company's Investor Relations Vice President or Director, the Legal department and/or outside counsel.

The Company will undertake to correct inaccurate factual information about the Company whenever the Company becomes aware of such inaccuracies and determines that such a correction is necessary. Employees should not take it upon themselves to correct such inaccurate information but should refer the matter to the Investor Relations or Communications department.

## **News Releases**

The Company will issue a news release on all material new developments unless it determines that such information should remain confidential. All news releases will be reviewed and approved by a member of the Investor Relations or Corporate Communications and Legal departments. In the event of an inadvertent disclosure of material nonpublic information such as during a conference call or in an investor presentation, the news release reflecting such information may be released upon the approval of the Legal department. Whenever possible, news releases will be scheduled for release prior to or following normal trading hours. All news releases will be posted on the Company's website.

## **Speakers, Presentations and Analyst Meetings**

Reg FD provides that whenever a representative of a U.S. public company, acting on its behalf, discloses material, nonpublic information to a securities market professional, analyst, individual investor or institutional investor ("Investor Community"), the company must make public disclosure of the information simultaneously if the disclosure is "intentional", or promptly thereafter if it is "unintentional." Authorized representatives of ICE who intend to discuss material, non-public information in a public forum must (i) provide adequate notice of the Company's participation in the presentation by issuing a press release and making a website posting and (ii) broadly disseminate the content of the presentation to the Investor Community simultaneous to, or immediately following, the presentation through a press release or other means of communication in compliance with Reg FD. On occasion, members of the financial community are invited into the Company to present at staff meetings, board meetings, divisional meetings, etc. All speaking engagements involving the financial community should be arranged through a member of the Investor Relations department. No meetings with investor analysts will

be done on a one-on-one basis and each meeting with an investor analyst will have either a member of the Investor Relations or Legal department present or on the telephone call.

### **Making Projections**

ICE may disseminate general guidance about expected revenue growth, operating expenses and other relevant business and financial matters during the quarterly earnings conference call, earnings press release or monthly volume releases. ICE does not provide earnings projections. Furthermore, no forward-looking financial information shall be given that is inconsistent with that contained in ICE's SEC filings. All financial guidance must be approved by the CFO.

### **Responding to Analysts' Projections and Reviewing Analysts' Reports**

When discussing the Company's performance, ICE speaks in terms of its most recent publicly announced business and financial information. ICE does not specifically endorse external estimates and ICE does not comment on earnings estimates of third parties. ICE will not review analyst reports prior to publication and will not endorse analyst conclusions, projections or recommendations. ICE does not confirm or deny any of the reports' statements regarding future predictions or projections nor does ICE confirm the accuracy of analyst earnings models. Furthermore, ICE does not mail any research reports at the request of individuals nor does ICE include research reports in its investor relations packages.

### **Conference Calls and Quarterly Earnings Releases**

The Company follows a consistent procedure each quarter in announcing its quarterly earnings results and discussing those results with the public. Quarterly conference calls are held in conjunction with ICE's quarterly earnings releases. These calls will be accessible by telephone and are broadcast live by web cast. Access is open to the public and a playback is made available on the company's website after the call. Notice of such scheduled conference calls or web casts will be given a reasonable time in advance of a regularly scheduled call or web cast and will include the date and time of the call or web cast, instructions on gaining access to the call or web cast and the general subject matter to be discussed.

### **Use of Safe Harbor Language**

ICE uses safe harbor language with respect to forward-looking statements at the beginning of its conference calls with the investment community and whenever ICE speaks with analysts or investors. Safe harbor language is also incorporated in ICE's written investor relations documents and press releases.

### **World Wide Web**

All documents on the Company website are subject to the same scrutiny as other publicly disseminated information.

## **Social Media and Chat Room Postings**

Unless approved by the Communications department, ICE does not respond to rumors or correct any inaccuracies that might appear in social media networks, chat rooms or other Internet outlets. ICE prohibits employees from discussing business information, rumors, earnings expectations or confidential information about the Company in any social media network, chat room or other Internet outlets.

Employees should be aware of their association with ICE in online social networks and chat rooms. If an employee identifies themselves as an ICE employee, the employee needs to ensure that their profile and related content is consistent with how the employee wishes to present themselves to colleagues and clients. ICE reserves the right to request that an employee remove their association with ICE in social media networks, chat rooms and on the Internet if ICE reasonably believes that such association could negatively impact ICE's reputation, employee relations, business or prospects. Employees should not discuss, cite or reference ICE's clients, partners or suppliers in any social media network, chat room, or on the Internet. ICE's logo, copyrighted material and trademarks may not be used without explicit permission in writing from the Legal department.

Misuse of social media networks, chat rooms or the Internet is not viewed favorably by the Company and can result in disciplinary action, up to and including termination of employment for cause. Please see the Company's Insider Trading Policy for additional information with respect to securities matters.

## **Selective Disclosure**

ICE does not permit selective disclosure of material nonpublic information and is extremely sensitive to the issues of selective disclosure. It is ICE's aim to treat all members of the investing public fairly and equally. ICE believes this Policy helps prevent selective disclosure.

## **Questions**

Please contact a member of the Investor Relations, Corporate Communications or Legal department if you have any questions regarding this Policy.