



TMX GROUP LIMITED
2021 ESG REPORT



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2021 HIGHLIGHTS

OUR BUSINESS

Launched **The Voluntary Climate Marketplace** powered by Trayport

36 Graduations from TSXV to TSX in 2021 - supporting the growth of SMEs

Continued focus on ESG issuer engagement and education

- Endorsement of the **IHS Markit ESG Reporting Repository™**
- **ROI from ESG** thought leadership series
- **Growth Accelerator** Education Program
- **ESG 101 Resource Hub**

25% total returns in 2021 on the S&P/TSX Composite ESG Tilted Index* (launched in 2021)

OUR PEOPLE

Recognized by **Greater Toronto's Top 100 Employers in 2021**

Recipient of the Global Equity Organization's Award for **"Best Plan Communication"**

Winner of the Disaster Recovery Institute International 2022 Awards of Excellence - **"Covid-19 Response and Recovery of the Year"**

Canadian HR Reporter awarded TMX Group with a 2021 award for our innovative wellness strategy during the COVID-19 pandemic

Our Trayport office received the award for **"Best Wellbeing Strategy"** at the Engagement Excellence Awards

Began participating in the **Progressive Aboriginal Relations™** certification program

Defined our **High Performing Culture** through new purpose statement and values

OUR COMMUNITIES

\$1.5M+ in charitable donations in 2021

\$60k towards organizations that support Indigenous communities

OUR ENVIRONMENT

76% office space is LEED platinum certified®

Neutralized our 2020 and 2021 GHG emissions through voluntary carbon offsets

Published inaugural **TCFD Climate Report**

GOVERNANCE

Director participation in our **TCFD materiality assessment**

Supported amended **shareholder proposal on ED&I**

Initiated work on **linking ESG** and **executive compensation**



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LETTER FROM CHIEF EXECUTIVE OFFICER



On behalf of TMX Group, I am pleased to present our 2021 Environmental, Social and Governance Report.

In the pages that follow, we detail the progress we have made on our sustainability journey over the past year, including the important foundational work we undertook across the organization to define our high-performance culture and corporate purpose. This report also outlines our near- and long-term priorities as we continue to integrate our ESG objectives into TMX Group's corporate strategy, business processes, and investment decisions.

In 2021, we enhanced our environmental disclosure with the release of our inaugural Task Force on Climate-related Financial Disclosures (TCFD) Report, detailing TMX's climate-related risks and opportunities. We also developed a new, employee-led equity, diversity, and inclusion (ED&I) strategy to foster a more inclusive culture at TMX. And while we are still early in the process, we are proud of the work we have done as part of our Indigenous reconciliation journey.

We also recognize that, given our central position in Canada's capital markets, TMX has an important role to play in empowering our stakeholders to become ESG leaders in their own right.

For the more than 2,300 public companies listed on our equities exchanges, Toronto Stock Exchange and TSX Venture Exchange, we provide educational resources and tools designed to facilitate broader ESG reporting - to help issuers meet new requirements and the needs of the modern investor. Additionally, Trayport, a TMX Group subsidiary, recently introduced a new global voluntary carbon marketplace where organizations can trade offsets through its Joule platform. TMX participated in the inaugural trade on the platform, which allowed us to meet our carbon neutrality commitment for 2020.

For investors, our equities and derivatives markets continue to introduce new products that facilitate ESG investing, adding to our suite of ESG indices, sustainable ETFs, and ESG derivatives.

While we are proud of the tremendous progress we have made in our ESG activities and priorities over the past year, we recognize that much more work lies ahead of us. And as an organization, TMX is committed to doing that work. This commitment is squarely aligned with our new corporate purpose: *to make markets better and empower bold ideas.*

I invite you to please read on to learn more.

Thank you for your continued support.

Sincerely,

John D. McKenzie
Chief Executive Officer
TMX Group Limited
May 3, 2022



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OVERVIEW

ABOUT TMX GROUP

TMX Group Limited (TMX Group) operates global markets, and builds digital communities and analytic solutions that facilitate the funding, growth and success of businesses, traders and investors. TMX Group’s key operations include **Toronto Stock Exchange (TSX)**, **TSX Venture Exchange (TSXV)**, **TSX Alpha Exchange**, **The Canadian Depository for Securities**, **Montréal Exchange (MX)**, **Canadian Derivatives Clearing Corporation**, and **Trayport** which provide listing markets, trading markets, clearing facilities, depository services, technology solutions, data products and other services to the global financial community. TMX Group is headquartered in Toronto and operates offices across North America (Montréal, Calgary, Vancouver and New York), as well as in key international markets including London, Hong Kong and Singapore. For more information about **TMX Group**, visit our website at **www.tmx.com**. Follow TMX Group on Twitter: @TMXGroup.

All dollar amounts are in Canadian dollars unless otherwise indicated.

CORPORATE HEADQUARTERS

TMX Group Limited
300 - 100 Adelaide St. West
Toronto, ON M5H 1S3

ADDITIONAL RESOURCES

2021 Annual Report
2022 Management Information Circular
2020 TCFD Climate Report

Trademarks

Capital Pool Company, Centre de marché TMX, Groupe TMX, TMX, the TMX design, TMX Datalinx, TMX Group, TMX Market Centre, TMX Money, Toronto Stock Exchange, TSX, TSXV, TSX Venture Exchange, TSX Venture 50, The Future is Yours to See, and Voir le futur. Réaliser l’avenir. are the trademarks of TSX Inc.

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* The S&P/TSX Composite Index, S&P/TSX 60 Index, S&P/TSX Composite ESG Tilted Index, S&P/TSX 60 ESG Index, S&P/TSX Composite ESG Index, S&P/TSX Renewable Energy and Clean Technology Index, S&P/TSX 60 Carbon Efficient Index, S&P/TSX Composite Carbon Efficient Index, S&P/TSX 60 Carbon Price Risk Index, S&P/TSX Composite Carbon Price Risk Index, S&P/TSX 60 Fossil Fuel Free Index, and all other S&P/TSX Indices referred to herein are products of S&P Dow Jones Indices LLC or its affiliates (“SPDJI”) and TSX Inc. (“TSX”). Standard & Poor’s® and S&P® are registered trademarks of Standard & Poor’s Financial Services LLC (“S&P”); Dow Jones® is a registered trademark of Dow Jones Trademark Holdings LLC (“Dow Jones”); and TSX® is a registered trademark of TSX. SPDJI, Dow Jones, S&P, their respective affiliates and TSX do not sponsor, endorse, sell or promote any products based on the S&P/TSX Indices and none of such parties make any representation regarding the advisability of investing in such product(s) nor do they have any liability for any errors, omissions or interruptions of the S&P/TSX Indices or any data related thereto.





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MISSION AND VISION

TMX GROUP CULTURE STATEMENTS

In 2021, we placed significant focus on continuing to develop our high performance culture and established our new enterprise purpose statement and core values. Please refer to **Building an Inclusive Culture and Workplace** in **OUR PEOPLE** section.

SUSTAINABILITY MISSION STATEMENT

We are committed to providing efficient, reliable and resilient markets that connect people, ideas and capital to deliver sustainable growth. Our mission is to empower clients to become ESG leaders in their own right through tools, products and services. We lead by example, and do our part by taking responsibility for our actions in the face of climate change, and help to build a sustainable future for the next generation.

SUSTAINABILITY VISION STATEMENT

At TMX Group, our commitment to our stakeholders is to operate responsibly by integrating sustainability practices into our enterprise strategy, business processes and investment decisions.

FOR OUR PEOPLE:

We are committed to attracting, developing and retaining a fair, diverse and inclusive workplace culture where we live our values, and empower our people to thrive and achieve their full potential.

FOR OUR CLIENTS:

We offer ESG products and services that enable:

- Issuers to access growth capital as they transition to a sustainable economy, and provide transparent and high quality disclosure.
- Investors to make investment decisions in sustainable finance by providing insights and capabilities through trading, data and other solutions.

FOR OUR SHAREHOLDERS:

We seek to provide long-term sustainable value by identifying and managing ESG risks and opportunities and providing transparency through reporting our goals, accomplishments and progress.

FOR OUR COMMUNITIES:

Make a lasting, meaningful positive impact as a responsible corporate citizen in the communities where we do business. We proactively seek to mitigate potential adverse impacts our business activities have—directly or indirectly—on sustainability factors.

OUR APPROACH TO ESG REPORTING

At TMX Group, annual ESG reporting is an opportunity to provide stakeholders with an overview of the progress we have made on our sustainability journey over the past year. Year-round engagement with our stakeholders (including investors, employees, clients, regulators and community groups), along with periodic research and analysis, helps ensure our ESG reporting focuses on the issues that are significant to TMX Group. Our disclosures are also informed by and aligned with the Sustainability Accountability Standards Board (SASB). Please also see Appendix A of this report.

In 2021, we completed an expansive climate-focused materiality assessment. Our materiality assessment process was facilitated by an independent sustainability consultancy. In addition to performing industry research and benchmarking, we conducted interviews with (i) three TMX Group investors, (ii) five members of the board, and (iii) four members of the senior management team. While we have done informal assessments in the past, this marked TMX Group’s first formal and in-depth climate materiality process with a third-party firm and it formed the basis for our inaugural **TCFD report** which was released in December 2021.

Going forward, we will continue to collaborate with all of our stakeholders and further assess our disclosure and metrics to produce clear, consistent and comparable disclosures.

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MEMBERSHIPS AND ENDORSEMENTS

ENDORSEMENT OF THE SUSTAINABILITY ACCOUNTING STANDARDS BOARD

We understand that comprehensive, robust and comparable disclosures are integral to enabling stakeholders to understand sustainability information, activity and progress in a meaningful manner. We support companies aligning their reporting with the SASB to provide information on ESG factors that are relevant to their industries.

TMX Group was the first exchange group to report under the SASB’s Security & Commodity Exchanges standard.

TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

TMX Group is an official supporter of the Financial Stability Board’s Task Force on Climate-Related Financial Disclosure (TCFD) and recognizes the TCFD recommendations as a useful framework for assessing and reporting on climate-related risks and opportunities.

TMX Group published our inaugural 2020 TCFD Climate Report in December 2021.

UNITED NATIONS SUSTAINABLE STOCK EXCHANGES INITIATIVE

TMX Group’s equities exchanges, TSX and TSXV, are proud and active members of the United Nations Sustainable Stock Exchange (SSE) initiative to promote sustainable performance and transparency in capital markets.

TMX Group is one of the founding signatories of the new derivatives partner exchanges network of the SSE initiative.¹

The column on the right sets forth our activities that align with the recommendations of the SSE²:

The table below sets forth our activities that align with the recommendations of the SSE² initiative:

SSE Activity	TMX Group (Y/N)	TMX Group Activities
SSE Partner Exchange	Y	Signed on as an SSE Partner in 2019.
Has annual sustainability report	Y	ESG report published in 2020, 2021 and 2022.
ESG reporting required as a listing rule	N	No. However, if any environmental or social information is deemed ‘material’ it must be immediately disclosed by a news release as required by the timely disclosure policies of TSX and TSXV, as applicable. In addition, securities rules require issuers to disclose all material information including those related to environmental and social issues.
Has written guidance on ESG reporting	Y	A Primer for Environmental & Social Disclosure published in partnership with CPA Canada
Offers ESG-related training	Y	Growth Accelerator Program, ESG 101 hub, ongoing issuer ESG education (see Issuer Education & Engagement in OUR BUSINESS).
Market covered by sustainability related index	Y	A suite of ESG S&P/TSX indices*.
Has sustainability bond listing segment	Y	Ability to list sustainable bonds from existing listed issuers on TSX. These bonds would be featured on a sustainable bond website. In addition, sustainable bonds from non-listed issuers (e.g. governments, supranationals, etc.) may be posted for trading on TSX.
Has SME listing platform	Y	TSXV is a specialized venue for capital raising for approximately 1,700 growth stage companies, commonly referred to as small and medium-sized enterprises (SMEs).

¹ <https://sseinitiative.org/derivativesexchanges/>

² <https://sseinitiative.org/stock-exchange/tmx/>



COVID-19 PANDEMIC AND FUTURE OF WORK



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COVID-19 PANDEMIC AND FUTURE OF WORK



TMX Group is a proud winner of the Disaster Recovery Institute International 2022 Awards of Excellence - Covid 19 Response and Recovery of the Year³

The global pandemic has altered the world and the way we operate. Its impact on individuals, communities, businesses, and the political landscape is far reaching. During these extraordinary times, we relied on our core organizational values, enterprise strategy, risk management practices and our talented people to guide us through this rapidly changing and complex situation.

In 2021, we continued to experience increased demand on our systems and services with increased activity, trading, messaging levels and client support demands. Our team rose to the challenge and ensured the market and our participants were effectively supported during these challenging times.

The health and safety of our people, our clients and the entire capital markets community has been and continues to be our top priority and consistently guides the decisions that we make. We deployed various IT and human resources tools to support both our employees working from home as well as our on site staff, including enhanced mental health benefits.

Our offices are currently fully open and meet all applicable public health requirements. In Q3/22, TMX Group will pivot from a 90% remote workforce to a hybrid workforce that consists of fully remote, fully in office, and hybrid remote/office employees.

We continue to focus on resiliency and engage in ongoing resiliency testing including our latest Disaster Recovery exercise completed in April 2022. As we look towards the future, TMX Group remains firmly focused on serving our clients with excellence, providing our markets with continuity, and executing against our global growth strategy.

FUTURE OF WORK

At TMX Group, we have the courage to be bold and innovate, and we care about our clients and each other's success and well-being. That is why we are re-imagining where, when, how and with whom work happens.

Specifically, we are guided by the health and well-being of our employees and alignment to our business objectives. We will get there by:

- creating flexibility and empowering our employees;
- using technology that enables us to work in new ways;
- managing our real estate footprint; and
- creating a high performance culture with exceptional talent.



We are honoured to be recognized for the hard work, agility and resilience of Team TMX as we have successfully adapted our working styles, communications strategies and business models to rise to the ever-shifting challenges of COVID-19. We couldn't be prouder to accept this award from one of the most-recognized organizations in the fields of business continuity and disaster recovery.



Cheryl Graden,
Chief Legal and Enterprise Corporate Affairs Officer
and Corporate Secretary and executive sponsor
of the COVID Response Team

³<https://conference.drii.org/awards-of-excellence/>



We INNOVATE
for our clients

OUR BUSINESS

TRAYPORT OFFICE, LONDON, UK



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OUR BUSINESS

CAPITAL FORMATION

Our equity exchanges, TSX and TSXV, are integral to the efficient operation of the capital markets. We continually support the capital markets community by providing companies of all types and at all stages of development with access to equity capital, while also providing market oversight to ensure market integrity. In addition to leveraging the regulatory expertise to set and oversee standards for our marketplaces, TSX and TSXV also lend their extensive experience and support to initiatives we believe enhance the broader capital markets ecosystem, such as advocating for enhanced disclosure on ESG matters. We therefore accompany our issuers in their journey to integrating ESG reporting best practices by providing information, materials and educational opportunities.

A YEAR IN REVIEW

2021 CLEAN TECHNOLOGY AND RENEWABLE ENERGY SNAPSHOT⁴



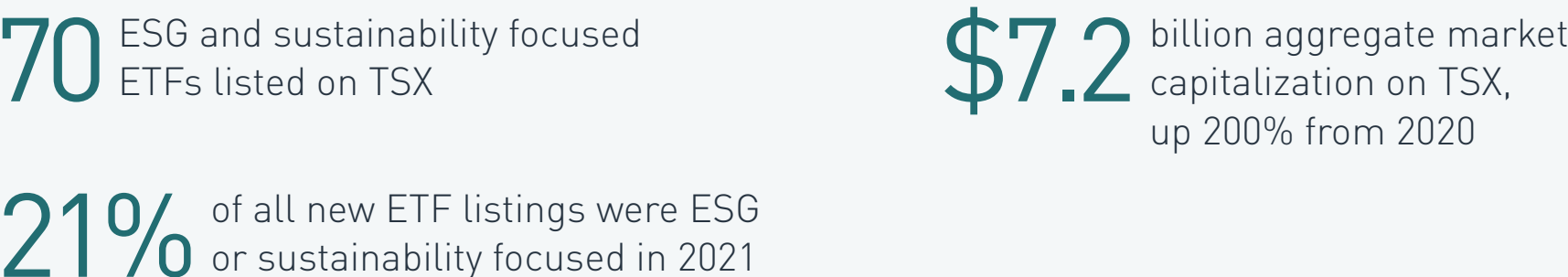
The clean technology and renewable energy sector has been one of our fastest growing sectors in terms of market valuation, with its market capitalization having risen 84% since 2017. Growth in this sector coincides with broader growth in our exchanges’ innovation sector⁵ overall, which rose 183% from \$188 billion at the end of 2017 to \$530 billion at the end of 2021.

Renewable energy issuers listed on our exchanges are becoming increasingly global with assets in the US, Europe, and Australia. To support capital raised in this sector, we hold clean technology and renewable energy conferences for institutional investors across Canada and in London, connecting our issuers with a diversified investor base.

⁴At December 31, 2021.

⁵Consists of the following sectors: clean technology, life sciences and technology.

2021 ESG ETF SNAPSHOT⁶



TSX continues to attract ETFs to its markets as the premier listing venue in Canada. In 2021, the number of ESG and sustainability-focused ETFs listed on TSX rose from 44 to 70, including the first ETF tracking S&P/TSX Composite ESG Index*.

2021 LOW-CARBON MINERAL ISSUERS SNAPSHOT



The transition to a low-carbon economy continues as does the demand for metal and mineral inputs for renewable energy, storage, electrification of transportation, and energy efficiency. These technologies are also mineral-intensive on a per unit basis. With nearly half of all global public mining companies listed on TSX and TSXV, the mining sector is well positioned to meet the demand for these metals and minerals. Specifically, there are over 680 listed companies producing at least one metal or mineral critical for the low-carbon economy and over 200 companies that are exclusively producing metals and minerals used in the low-carbon economy.

⁶At December 31, 2021.

⁷Represents a subset of the mining sector that produces exclusively metals and minerals used in the transition to a low-carbon economy. (copper, aluminum, chromium, graphite, iron, lead, lithium, manganese, molybdenum, silver, titanium, U308, vanadium and zinc). This information is provided for information purposes only. Neither TMX Group Limited nor any of its affiliated companies represents, warrants or guarantees the accuracy or completeness of this information and we are not responsible for any errors or omissions in or your use of, or reliance on, the information provided.



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OUR BUSINESS

SUPPORTING THE SUSTAINABLE GROWTH OF COMPANIES

TSX lists over
1,700
issuers and funds

21%
of issuers in S&P/TSX Composite
Index* graduated from TSXV to TSX⁸

TSXV lists over
1,700
growth stage companies

735
companies graduated from
TSXV to TSX⁹

A listings platform, such as TSXV designed specifically for SMEs, is recognized by the SSE as an activity in advancement of sustainability in the markets in which we operate (see **United Nations Sustainable Stock Exchanges Initiative** above). TSXV also offers specialized structures, policies and programs to support and promote venture stage companies in accessing public markets earlier in their life cycle.

- **Capital Pool Company program™ (see here for more information)**
 - Brings transparency to reverse takeovers, which have created efficient mechanisms to allow venture stage companies to access public markets earlier in their life cycle.
- Our flagship **TSX Venture 50™** recognition program (see here for more information)
 - An annual ranking of companies from a variety of sectors, which showcases the top-performing listed issuers on TSXV over the last year.

Promoting Transparent and Efficient Capital Markets

TSX and TSXV issue rules, policies and other similar instruments around governance and disclosure for our issuers. Our quality standards for our issuers are layered on top of requirements under securities law and corporate law. In developing our policies, processes and products, we meet with local committees and provincial securities regulators to ensure our exchanges conduct their operations in a manner consistent with the public interest, which includes protecting our clients from unfair or improper practices and fostering fair and efficient capital markets.

1. Both TSX and TSXV have disclosure policies. Under these policies, issuers are required to make timely disclosure of all material information which encompasses both material facts and material changes relating to a company. The timely disclosure obligations in the exchanges’ policies complement those found in securities legislation.
2. TSX and TSXV monitor compliance with these requirements. In addition to leveraging our regulatory expertise to set and oversee standards for our marketplaces, we also lend our extensive experience and support initiatives we believe enhance the broader capital markets ecosystem.
3. Under Canadian securities regulations, issuers must disclose all material information regarding their business and affairs. The fundamental principle is that issuers should provide all information that would be material to an investor’s investment decision, including material information about environmental and social issues. The Canadian Securities Administrators (CSA) requires issuers to regularly update the market about material information pertaining to their business and affairs in disclosure documents, such as financial statements, the annual information form and management’s discussion and analysis.

Recent Developments

Guidance to issuers on environmental and diversity disclosure has been issued in Staff Notices by the CSA. The Staff Notices also highlight disclosure requirements related to forward-looking information. As with any forward-looking information, issuers must follow these requirements.

TSX and TSXV regularly consult with their stakeholders to discuss regulatory initiatives, including those drafted by the CSA initiatives.

TSX and TSXV consulted with its advisory committees to ensure that their views, needs and challenges were taken into account when TMX Group submitted its comments on the CSA proposed National Instrument 51-107 - *Disclosure of Climate-Related Matters*. This proposed instrument would introduce disclosure requirements consistent with the TCFD recommendations.

⁸ At December 31, 2021.

⁹ From January 1, 2000 to December 31, 2021.

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OUR BUSINESS

ISSUER EDUCATION & ENGAGEMENT

TSX and TSXV are committed to supporting our issuers as public companies promoting strong corporate governance and sustainability practices. This includes guiding companies towards providing comparable, decision-relevant, standardized ESG disclosure, and leveraging standards and frameworks such as SASB and TCFD. We provide issuers with access to resources, facilities and educational opportunities, which align with the recommendations of the SSE (see **United Nations Sustainable Stock Exchanges Initiative** above).

TMX Group is a research and education collaborator for the **Climate Engagement Canada¹⁰** initiative which helps to drive dialogue between the financial community and corporate issuers to promote a just transition to a net-zero economy.

¹⁰ <https://climateengagement.ca/participants/>

Initiative	Description	2021 Highlights
Endorsement of the IHS Markit ESG Reporting Repository™	A free facility for issuers to create standardized ESG disclosure, to broaden global distribution of ESG data, and access peer and market insights.	Over 250 TSX and TSXV companies have data within the IHS Markit ESG Reporting Repository™.
ROI from ESG thought-leadership series	A TSX event that is focused on helping issuers derive value from ESG efforts.	Our ROI from ESG event attracted over 660 registrations from over 400 unique companies.
Growth Accelerator Education Program	Complimentary one-on-one education and mentorship program includes sessions on principles of good governance, building an effective board, the importance of ESG, and best practices for ESG disclosure.	Over 670 ESG modules were delivered in 2021.
ESG 101 Resource Hub	A central repository of resources, guides, articles, and events from leading experts, peers and agencies in this space.	In 2021, we added four new ESG contributors whose content aided in the distribution of over 95 educational assets relevant to the issuer audience. Our ESG 101 newsletter reached over 4,000 subscribers.
A Primer for Environmental & Social Disclosure	Our 2020 Primer, developed in partnership with CPA Canada, provides issuers with guidance on the importance of environmental and social disclosure, regulatory requirements for environmental and social disclosure, as well as practical steps to providing disclosure.	Our 2020 Primer still proves relevant with 125 downloads in 2021.



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OUR BUSINESS

EQUITIES & FIXED INCOME TRADING AND CLEARING

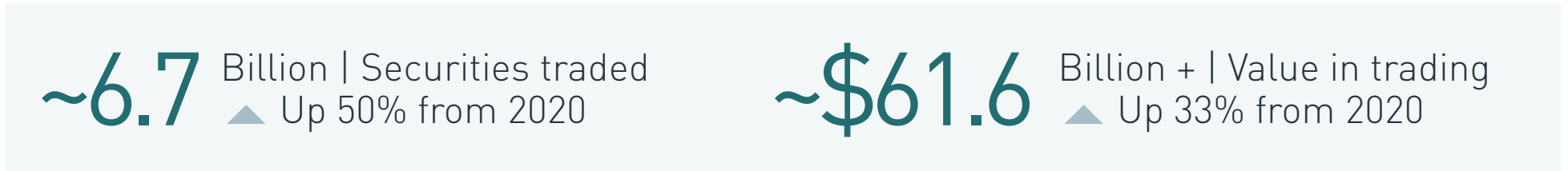
Providing efficient and liquid equity trading markets is one of the key services we provide to Canadian and global investors. In 2021, 65% of Canadian trading in our listed issuers occurred on one of our three exchanges.¹¹

Below is a table of our accounting and trading activity metrics aligned with SASB reporting:

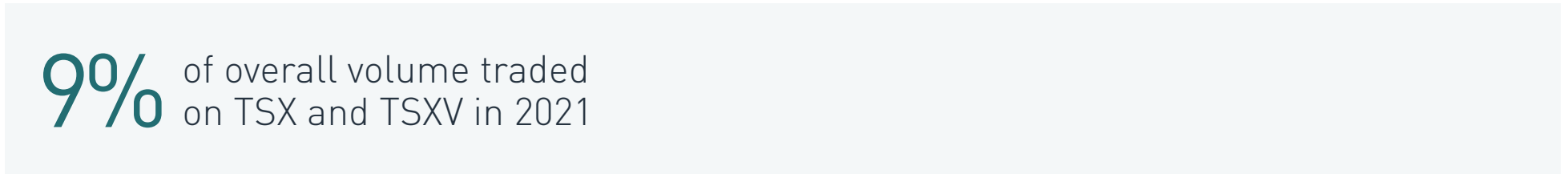
Topic	Accounting Metric	Unit of Measure	2021	2020
Promoting Transparent & Efficient Capital Markets	Halts related to public release of information ¹²	Number	1,268	1,318
		Duration ¹³	n/a	n/a
	Pauses related to volatility (Single Stock Circuit Breaker)	Number	133	178
		Duration	665 minutes	890 minutes
	Pauses related to volatility (Market Wide Circuit Breaker)	Number	—	4
		Duration	—	60 minutes

Activity Metric	Market	2021	2020
Average daily number of trades executed by product or asset class	TSX	1,110,147	1,207,349
	TSXV	106,252	48,358
	TSX Alpha Exchange	137,069	139,165
	MX Derivatives	89,234	85,491
Average daily volume traded, by product or asset class	TSX	413.4 million	458.2 million
	TSXV	260.2 million	209.2 million
	TSX Alpha Exchange	88.3 million	73.9 million
	MX Derivatives	0.6 million	0.5 million

2021 CLEAN TECHNOLOGY AND RENEWABLE ENERGY SNAPSHOT¹⁴



100% LOW CARBON MINERALS ISSUERS



¹¹ Investment Industry Regulatory Organization of Canada (IIROC) data, excluding intentional crosses in 2021.

¹² Halts/resumptions in Canada are managed by IIROC.

¹³ Depending on the nature of halt the duration can range from hours to months.

¹⁴ At December 31, 2021.



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SUSTAINABLE BOND TRADING

Canadian dollar denominated sustainable bonds have been issued by corporations, various levels of government, quasi-governmental and supranational organizations. We currently offer sustainable Broker-Dealer bond trading through Shorcan, a subsidiary of TMX Group and a leading Canadian Inter-Dealer Brokerage firm that specializes in Canadian Fixed Income products.

In March 2021, we embarked on an initiative to post sustainable bonds to trade on TSX. The initiative, pending regulatory reporting requirements, looks to offer government and quasi-governmental entities a means to expand their investor reach by making the bonds readily available on TSX to retail investors.

Complementary to our sustainable bond trading initiative, we launched our Sustainable Bond Portal in 2021. This portal allows investors to access information related to the sustainable bonds available for trade on TSX.

DERIVATIVES TRADING & CLEARING

The Montreal Exchange (MX), our derivatives trading business, offers equity options as well as share futures on all of the constituents of the following:

- S&P/TSX 60 ESG Index*
- S&P/TSX Composite ESG Index*
- S&P/TSX 60 Fossil Fuel Free Index*
- S&P/TSX 60 Carbon Efficient Index*

MX currently offers two ESG index futures, enabling investors to hedge their traditional portfolios, optimize their ESG portfolios or to enable ESG funds to manage cash inflows and outflows.

- S&P/TSX 60 ESG Index Futures - Launched December 2020
- S&P/TSX Composite ESG Index Futures - Launched April 2021

In 2020, MX launched a Sustainable Investing Website. The website provides investors with education on sustainable investing broadly and is an access point for derivative products that are available to trade on MX. This includes the above ESG index futures, options and single stock futures on the names of companies appearing in ESG and sustainable indices, as well as the options and futures available for listed issuers who have made public net-zero carbon commitments.

GLOBAL SOLUTIONS, INSIGHTS & ANALYTICS

TMX DATALINX™

In 2021, TMX Datalinx™ launched a new ESG index which reweights the S&P/TSX Composite Index towards companies with higher ESG scores within each sector. The **S&P/TSX Composite ESG Tilted Index** showed total returns of 25% in 2021.

TMX Datalinx™ provides insights, analytics and real-time data to support trading and investing in TSX and TSXV equities, ETFs, sustainable bonds and derivatives.

Our broad range of products measure our markets through many lenses, with a growing suite of ESG indices (**see our page for TMX Datalinx S&P/TSX Indices**). ESG indices are calculated through our partnership with S&P Dow Jones Indices and provided to TMX Datalinx index data clients on a subscription basis, with end of day levels publicly available on TMX Money™.

Our growing suite of ESG indices include:

- S&P/TSX 60 ESG Index
- S&P/TSX Composite ESG Index
- S&P/TSX Composite ESG Tilted Index
- S&P/TSX Renewable Energy and Clean Technology Index*
- S&P/TSX 60 Carbon Efficient Index
- S&P/TSX Composite Carbon Efficient Index*
- S&P/TSX 60 Carbon Price Risk Index*
- S&P/TSX Composite Carbon Price Risk Index*
- S&P/TSX 60 Fossil Fuel Free Index

TMX Datalinx provides insights, analytics and data for 70 ESG and sustainable ETFs listed on TSX.

As sustainable and ESG investing continues to grow, so does our clients’ need for a more sophisticated product offering. To service this need, we continue to work with our clients on new ESG products.



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OUR BUSINESS

GLOBAL SOLUTIONS, INSIGHTS & ANALYTICS

TMX MONEY

TMX Money helps retail investors research and discover companies that are listed on TSX and TSXV.

At the beginning of Q2 2022, TMX Money launched two Progressive Aboriginal Relations (PAR) stock lists. These stock lists highlight TSX and TSXV listed companies that are **PAR Certified** or **PAR Committed**.

TMX Group (TSX:X) is proud to be a PAR Committed company. For more information, please see **Equity, Diversity and Inclusion** under **OUR PEOPLE**.

TRAYPORT

Trayport provides data aggregation, execution and algorithmic trading solutions to global energy and environmental markets. Trayport’s role in these markets is to aggregate liquidity across multiple trading venues, including exchanges and OTC brokers, to enable traders to access best execution regardless of venue. Trayport technology supports liquidity in a number of regulated environmental markets in Europe, UK and North America.

Trayport supports the growth of sustainable commodities in a number of ways:

- Data aggregation and execution solutions support liquidity in a number of regulated environmental markets in Europe (EU ETS¹⁵), UK (UK ETS¹⁶) and North America (RGGI, CCA & RECs¹⁷).
- Algorithmic trading solution allows renewable generators to manage the volatile nature of their generation assets in the intra-day market.

- The **Voluntary Climate Marketplace (TVCM)**, launched in March 2022 and operated by IncubEx, offers market access to trade voluntary carbon offsets and is underpinned by Trayport’s Joule™ platform.

¹⁵ EU Emissions Trading Scheme

¹⁶ UK Emissions Trading Scheme

¹⁷ Regional Greenhouse Gas Initiative (RGGI), California Carbon Allowances (CCA), Renewable Energy Certificates (RECs).



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GOVERNANCE & RISK

The TMX Group board of directors is committed to ensuring that TMX Group adheres to the highest standards of corporate governance. TMX Group’s corporate governance policies and practices are designed to support the board in discharging its responsibilities to stakeholders and to enhance shareholder value.

The board’s primary responsibility is to provide governance and stewardship to TMX Group, and to oversee our strategy, business operations and management. Our independent chair leads the board and works with the Chief Executive Officer to ensure that TMX Group fulfills its responsibilities to stakeholders including:

- Actively promoting a culture of integrity to advance high standards of ethical conduct,
- Meeting our mandate to operate in the public interest,
- Overseeing the integration of our sustainability and ESG objectives into our enterprise strategy, business processes, operations and investment decisions, and
- Ensuring that we have policies, processes and systems in place to identify and manage key enterprise risks and objective certainty.

ADDITIONAL RESOURCES

Our corporate governance practices are aligned with National Instrument 58-101 — Disclosure of Corporate Governance Practices, National Policy 58-201 — Corporate Governance Guidelines, and recognition orders issued by the Ontario Securities Commission, Québec’s Autorité des marchés financiers, the Alberta Securities Commission and the British Columbia Securities Commission. You can find additional information on our corporate governance practices and risk management practices using the following resources:

- [2022 Management Information Circular](#)
- [2021 Annual Report](#)
- [Board Diversity Policy](#)
- [Board Code of Conduct](#)
- [Employee Code of Conduct](#)



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ESG GOVERNANCE AND OVERSIGHT AT TMX GROUP

The board oversees TMX Group’s integration of sustainability and ESG objectives into our enterprise strategy, business processes, operations and investment decisions. Our board and committee roles are outlined below:

BOARD OF DIRECTORS	GOVERNANCE AND REGULATORY OVERSIGHT COMMITTEE	FINANCE AND AUDIT COMMITTEE	HUMAN RESOURCES COMMITTEE
<ul style="list-style-type: none">Ethical cultureStrategic planning (including ESG strategy)Financial oversight and reportingRisk oversightLeadership and successionShareholder communication	<ul style="list-style-type: none">Board stewardshipBoard size and compositionDirector selection and orientationDirector independenceESG reportingCorporate governance policies & practicesReal and perceived conflicts of interest	<ul style="list-style-type: none">Internal controls and whistleblower complaintsExternal auditInternal audit and assuranceRisk managementFinancial planning, investment opportunities, treasury activities and capital plan	<ul style="list-style-type: none">Executive appointment and compensationSuccession planning for the Chief Executive Officer and other senior executivesAdministration of compensation and benefits plans

2021 HIGHLIGHTS

TCFD Materiality Assessment

Five members of the board participated in our climate-focused materiality analysis in connection with our **2020 Task Force on Climate-related Financial Disclosures (TCFD) Report**, which details TMX Group’s climate-related risks and opportunities. The report outlines how we are actively addressing our carbon footprint while supporting Canada’s capital markets’ transition to a low-carbon economy. Based on our materiality assessment, we anticipate that climate-related opportunities and risks will play a more prominent role in informing our overall enterprise strategy going forward. On the recommendation of the governance and regulatory oversight committee, the board reviewed and approved the TCFD report in December 2021. Going forward, our TCFD-aligned disclosures will form part of our annual ESG report.

Linking Executive Compensation and ESG

Our human resources committee is overseeing the introduction of ESG goals into the individual performance objectives of the CEO and our senior management team. These will affect their short-term incentive awards starting in 2022. Individual performance objectives for the CEO and members of the senior management team will include individual and team goals relating to corporate and commercial ESG priorities. This approach allows ESG objectives to be tailored to each role and business unit or corporate function, with goals cascaded down through the organization. Focus will be placed on both TMX Group’s corporate actions (talent & culture, diversity and inclusion, sustainable business practices) and our commercial actions, including the products and services we provide to our clients, and the support we provide clients to help them with their own ESG strategies. See also page 67 in our **2022 Management Information Circular**.

Amended Shareholder Proposal on ED&I

At our annual and special meeting of shareholders held on May 12, 2021, we supported, and our shareholders approved, the Atkinson Foundation’s amended shareholder proposal. The board committed to reporting to shareholders on (i) the development of ED&I programs, including those that encompass current and prospective Indigenous employees, and relationships with Indigenous communities; (ii) our review of procurement from Indigenous-owned businesses, and those owned by other underrepresented groups; (iii) our engagement with qualified Indigenous and other organizations to support this work. Please see page 9 in our **2022 Management Information Circular** for our report to shareholders on how TMX Group is working to foster a fair, diverse and inclusive culture of belonging that results in positive change for the people, communities and markets we serve and a summary of the steps we are taking in our reconciliation journey with Indigenous stakeholders and communities. Please also see **Equity, Diversity and Inclusion** in **OUR PEOPLE** section below for further details on our overall ED&I strategy at TMX Group.



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GOVERNANCE & RISK

OPERATING RESPONSIBLY & ETHICALLY

RISK OVERSIGHT

The board oversees risk management by (i) making sure we have policies, processes and systems in place to identify and manage key enterprise risks and objective certainty; (ii) approving our enterprise risk management policy; and (iii) approving our risk appetite statement.

The finance and audit committee of the board oversees the adequacy and operating effectiveness of the enterprise risk management program which includes the adequacy of risk management policies, processes and systems for managing key risks impacting TMX Group’s strategic and operational objectives. See also **Risk Management** below for our approach to risk management at TMX Group.

TONE AT THE TOP

Our recognition orders require us to take reasonable steps to make sure that every director and officer will perform their duties with integrity and in a manner that is consistent with TMX Group’s public interest responsibilities. Every director and officer completes a questionnaire, a TSX personal information form and consents to searches being conducted so that his or her personal information can be verified by TSX and TMX Group retains a third party to conduct investigative due diligence-based searches and analysis of potential reputation and integrity risks on proposed new director and officer nominees.

INDEPENDENCE

Independence for the board is defined by National Instrument 52-110 – Audit Committees, National Policy, 58-201 — Corporate Governance Guidelines and our recognition orders. The governance and regulatory oversight committee assesses each director’s independence. The Chair of the board must be independent. Directors are expected to submit their resignation to the board if their circumstances change, or if there are reasonable grounds to question their ability to act independently.

CODES OF CONDUCT

The board code of conduct emphasizes the importance of ethics in the promotion of a climate of honesty, truthfulness and integrity. It covers, among other things, the obligations of a director, confidentiality and conflicts of interest. The employee code of conduct emphasizes the importance of doing business ethically. It applies to all TMX Group officers and employees (which include consultants and independent contractors) and officers and employees of our subsidiaries, and covers **confidentiality, conflicts of interest, anti-bribery and corruption, employee trading, whistleblowing, supplier and client relationships and technology**, among other things. Violations can result in disciplinary action, up to and including dismissal.

In 2021, each director signed an acknowledgement that they read, understood and complied with the board code of conduct. Each employee passed a test before signing an acknowledgement that they read, understood and complied with the employee code of conduct.

WHISTLEBLOWING

Employees may report violations of the employee code of conduct to their manager, the Chief Executive Officer, the Chief Internal Auditor or a member of the senior management team, including the Chief Human Resources Officer and the Chief Legal and Enterprise Corporate Affairs Officer. Employees may also report violations to the Chair of the finance and audit committee or, if they prefer to remain anonymous, through our confidential third-party whistleblower service. All reports are investigated promptly, confidentially and impartially. Reports of violations are responded to impartially and without retaliation.

The board is ultimately responsible for approving and overseeing compliance with the board code of conduct and the employee code of conduct. Directors who are aware of a breach of the board code of conduct must immediately notify either the corporate secretary or the assistant corporate secretary of TMX Group, who will inform the Chair of the governance and regulatory oversight committee within two days of receiving the report.

In 2021, the human resources committee approved TMX Group’s speaking up policy. The policy empowers each employee to speak up and ask questions, raise concerns and report (including on an anonymous basis with our independent third party whistleblower service), without fear of retaliation or unfair treatment, any wrongdoing including all known, observed or suspected misconduct or improper or unethical acts.



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GOVERNANCE & RISK

OPERATING RESPONSIBLY & ETHICALLY

CONFLICT OF INTEREST

The two codes of conduct cover potential conflicts of interest and require that all directors, officers and employees avoid situations that may result in a potential conflict. In the event a director, officer or employee finds themselves in a potential conflict situation, the codes require that the person disclose the nature and extent of his or her interest in writing or by requesting to have it entered in the minutes of the meeting. In the event of a conflict of interest, the person in question will leave the meeting when the issue is discussed and, in the case of a director will refrain from participating in any decision or action. The governance and regulatory oversight committee is responsible for overseeing and monitoring compliance of the two codes, and authorize any waiver granted to any director or executive officer in connection with the codes. The committee will also cause an investigation of any reported violations of the board code of conduct and will oversee an appropriate response, including corrective action and preventative measures. Any director who violates the board code of conduct will face appropriate, case specific, disciplinary action.

In addition, directors and executive officers complete annual questionnaires and must disclose any real or potential conflicts of interest or related party transactions. These questionnaires assist TMX Group to identify and monitor potential conflicts or possible related party transactions. The board takes appropriate measures to ensure the exercise of independent judgment in considering transactions and agreements that a director or executive officer may have a material interest in. There were no material conflicts of interests or related party transactions reported by the board, CEO or the executive leadership team in 2021. On occasion, directors recuse themselves from deliberations and approvals even when their interest is not material (or the transaction or contract is not material) to avoid even the perception that a conflict of interest may arise.

ADDITIONAL INFORMATION

Our **2022 Management Information Circular** contains further information on our board and our directors, including on:

- Director independence
- Board interlocks
- Board and committee meeting attendance
- Director areas of expertise



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BOARD DIVERSITY

The board derives strength from the diversity of thought represented by the variety of backgrounds, qualities, skills and experience of its directors. In identifying suitable candidates, the governance and regulatory oversight committee will consider independence, and experience as a CEO/senior officer or board member or in the following areas: governance, regulated company, technology, strategy, financial and risk, mergers and acquisitions, marketing, human resources, energy, broker/dealer, derivatives, clearing, public venture market, international business and environmental, social and governance. As well, the governance and regulatory oversight committee will consider any gaps in representation from geographic regions relevant to TMX Group’s strategic priorities and take into account the legal and regulatory obligations for directors unique to TMX Group under its recognition order securities law requirements. Qualities such as integrity, good character and high regard in his or her community or professional field are expected of all board members.

When identifying and considering qualified candidates for the board, the governance and regulatory oversight committee will also consider diversity criteria reflecting the communities in which TMX Group operates, including but not limited to gender, age and geographic background as well as Indigenous Peoples and other under-represented groups, including racialized persons, people living with disabilities and members of the 2SLGBTQ+ community (collectively with Indigenous Peoples, referred to as the “other diversity characteristics”). “Indigenous Peoples” is defined as First Nations, Inuk or Métis.

25%
WOMEN

The board is committed to achieving a board composition in which by 2023

On an annual basis, the governance and regulatory oversight committee will recommend that the board adopt objectives for achieving the board diversity and inclusiveness goal set out in the board diversity policy, taking into account our unique regulatory obligations.

THE BOARD’S DIRECTORS
WILL COMPRISE OF

30%

OR MORE
THAT IDENTIFY
AS WOMEN

30%

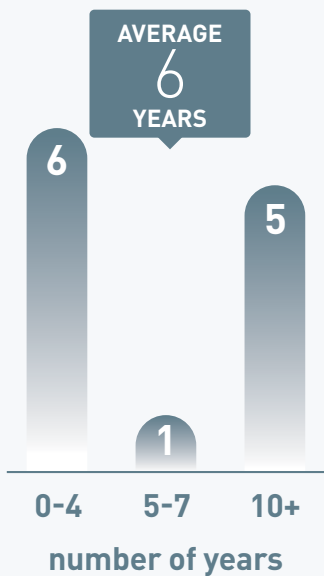
OR MORE
THAT IDENTIFY
AS MEN

17%
OTHER
DIVERSITY
CHARACTERISTICS

Our board diversity policy includes other diversity characteristics as a factor to be considered when determining board composition. In 2021, the board set and achieved its goal to have at least one director reflect one of the other diversity characteristics by TMX Group’s 2022 annual meeting.

This year’s directors include two directors who identified themselves as having other diversity characteristics, representing 17% of the nominees.

TENURE



We believe that board renewal is in the best interests of TMX Group. The board does not have a mandatory retirement age, but has a tenure limit of 12 years for directors appointed or elected to the board after May 2011, to be served in one-year terms.

12 YEAR TENURE
LIMIT

The governance and regulatory oversight committee can nominate a director who has reached the tenure limit for up to three additional one-year terms, if necessary to comply with regulatory requirements, to ensure a specific area of expertise is represented on the board, or if it is otherwise in the best interests of TMX Group.



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RISK MANAGEMENT

Effective risk management is fundamental to our ability to drive long-term sustainable growth through the execution of our strategic and operational objectives. Our Objective Centric Risk Management (“OCRM”) approach to risk management addresses opportunities, uncertainties and threats to the successful achievement of our objectives rather than managing our risks in isolation. This approach to risk management does not change the risks faced by our organization. Instead, it anchors the risk management process to our objectives which supports the proper allocation of resources across the enterprise.

ESG-related opportunities, uncertainties and threats are integrated within these activities ensuring we allocate appropriate resources across the business in a way that maximizes the likelihood that we will achieve our objectives by managing our risks and deploying our risk treatments. Further description of our OCRM approach is contained in our **2021 Annual Report**. Our business unit and corporate function leaders own the objectives, including ESG-related objectives, and therefore remain accountable for the effective management of risks assumed in their activities. The enterprise risk management (ERM) team facilitates and supports our leaders in the pursuit of their objectives and ensures that an appropriate framework is in place to identify, assess, measure, manage, monitor and report risks so that the outcomes of these activities are transparent and understood, consistent with our risk appetite, appropriately balance risk and reward, and serve as inputs into the enterprise strategy.



CULTURE

The board, together with the CEO and senior management, promotes an enterprise-wide ethical culture that values the importance of effective risk management in day-to-day business activities and decision making, and encourages frank and open communication.



ACCOUNTABILITY

Risk management is integrated into policies and internal processes. Responsibilities and levels of authority for risk-taking are clearly defined. Leaders within the business units and corporate functions own TMX Group’s strategic and operational objectives, and related risks assumed in their activities, including ESG-related objectives and risks, and are accountable for the effective management of those risks, supported by the risk management and internal audit groups.

TMX Group employs a Five Lines of Accountability model, which enhances the traditional Three Lines model by reinforcing the role of senior management and recognizing the critical role the board has in risk management. We sufficiently define these roles and responsibilities and associated levels of authority across the enterprise. For further description of our Risk Accountability at TMX Group/Five Lines of Accountability, see our **2021 Annual Report**.



PROCESS

TMX Group’s enterprise risk management program provides a framework to identify, assess, measure, manage, monitor and report on material risks that may impact TMX Group strategic and operational objectives. It ensures that objectives and risks across the organization:

- are transparent and well understood;
- are consistent with the company’s risk appetite;
- appropriately balance risk and reward; and
- serve as inputs into the enterprise strategy formulation process

Our enterprise risk management process, which is reassessed regularly, includes disaster recovery and business continuity for critical functions and systems, to protect our people and resources and allow us to continue critical business functions if a disaster occurs.



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KEY ESG AND SUSTAINABILITY RELATED RISKS

Key ESG and sustainability related risks include business resilience, client concentration and natural resource and energy-related businesses, cybersecurity, and information technology and talent management. For a more detailed description of our climate-related risks and the actions we are taking to actively manage these risks, please refer to page 16 of our **2020 TCFD Climate Report**.

BUSINESS RESILIENCE

Our critical business functions could be interrupted by geopolitical upheaval, including terrorist, criminal and political, or other types of external disruptions, including pandemics, human error, climate change, natural disasters, extreme weather, power loss, telecommunication failures, theft, sabotage and vandalism.

To ensure that our people, critical operations and assets of our business are protected and that we can recover from a business interruption within an acceptable timeframe, our Business Resilience program consists of a series of integrated crisis management, disaster recovery, pandemic and business continuity plans for critical business functions. All critical operations maintain a split operation for both data centers and office space, to provide redundancy and back-up in terms of technology, facilities and staffing to reduce the risk and maintain recovery time objectives in the event of a disruption. We also maintain back-up procedures and incident management plans to treat an interruption, failure, or disruption of our critical information technology for all of our key businesses. These plans consider a wide range of scenarios, including the identification of key third party vendors, and are subject to regular and rigorous testing.

We and the board take every market disruption very seriously. If an interruption, failure, or disruption occurs, the board and regulators are provided with timely notification by e-mail of the incident and the board continues to be directly engaged about the length, root cause of the incident, recovery plans and expectations for remediation. We provide the board with a post-mortem analysis at its next regularly scheduled board meeting, including about the technology and operational responses necessary to eliminate future market disruptions. We and the board view having our systems up and working every day as a critical component to our strategic objective of operating effectively. For more detailed information, please see **Information Security/ Cybersecurity & System Availability** under **TECHNOLOGY** section.

NATURAL RESOURCE AND ENERGY RELATED BUSINESSES

While TMX Group operates a globally diversified business, the Canadian market and Canadian based firms represent our largest concentration of business, as measured by revenue generated from trading, clearing and listing activities. For a more detailed description of our client concentration risks, please refer to page 80 of our **2021 Annual Report**. A large portion of the Canadian economy is based in natural resources and energy related businesses. In 2021, trading concentration by volume and market capitalization across mining, oil & gas sectors was 48% and 19%, respectively.

As such, we are exposed to factors that impact these sectors, including environmental regulations, the transition to a low carbon economy and the growth of sustainable investing. Any prolonged downturn, or upturn, in these sectors has the potential to impact our financial performance, including investment performance, the number of listed issuers, trading and transaction volumes across our trading, clearing, settlement, depository, custodial and entitlement businesses, and market data sales, impacting on our operating results.

We support Recommendation 9 of the Government of Canada’s Expert Panel on Sustainable Finance and in particular the need to establish a definition and standard for transition financing. In a resource based economy this will be especially relevant to ensure companies have the access to capital they require to make the investments they need to drive material emissions reductions in their operation and spur further innovation.

We have defined our business growth objectives to include business development and sales efforts focused on expanding our geographic footprint to attract international clients across all sectors and accelerating growth in targeted sectors (including the innovation sector which incorporates clean technology and renewable energy companies) where we are uniquely positioned, while maintaining our resource sector franchise. The energy sector will play a key role in lowering greenhouse gas emissions within the economy, while the mining sector will provide the metals and minerals that will power this transition, creating an opportunity for our low-carbon mineral issuers. Furthermore, we are providing ESG education sessions and resources to connect, encourage and support our issuers in their transition. In these ways, we are actively managing our exposure to macroeconomic factors that impact our business. For a further discussion of the opportunities addressing this risk, see discussion under **OUR BUSINESS** section.



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KEY ESG AND SUSTAINABILITY RELATED RISKS

CYBERSECURITY AND INFORMATION TECHNOLOGY

Our processes and networks and those of our third-party service providers, participants, and our customers may be vulnerable to information security risks, including unauthorized access, computer viruses, theft of data, denial of service attacks, and other security issues. Persons who circumvent security measures could wrongfully use our information, cause resiliency and availability issues with our services that could impair the integrity of our markets and have a material adverse impact on our business, financial condition and results of operations. TMX Group has invested significant resources to protect against the threat of security breaches to prevent or limit reputational, regulatory and legal consequences of cyber attacks. TMX Group will continue to monitor for trends and respond accordingly with the adoption of strategies, technologies (technology modernization initiatives) and practices such as increasing reliance on cloud based services, to prevent or limit the impact of cyber threats, including those caused by the increasing evolution of the cyber threat landscape and the sophistication of threat actors. This will consequently help ensure the achievement of our business objectives.

We maintain robust systems to protect our processes and networks from cybersecurity threats. Our information security team, led by our Chief Information Security Officer, develops and manages our information security services, including cybersecurity oversight for IT and business operations, data management, application development and maintenance functions.

We leverage and implement industry best practice security measures to address the cyber threat landscape, manage increased volumes, and changes in our trading, clearing, settlement and depository activities, and address customer demands for improved performance and security requirements. These measures also address protection from people who could wrongfully use our information or cause interruptions or malfunctions in our operations which could damage the integrity of our markets and data provision. In addition, our employees are exposed to quarterly phishing tests and must complete an annual security awareness training and quiz. The board reviews our cybersecurity and information technology program, strategy and planning at least twice a year. For detailed information on **Information Security, Cybersecurity and System Availability**, please refer to **TECHNOLOGY**.

TALENT MANAGEMENT

Our people are key to our business and if we are unable to attract and/or retain talented employees, it can adversely affect the achievement of our objectives.

Our success depends to a significant extent upon the continued employment and performance of a number of key management people whose compensation is partially tied to share options and other long-term incentive plans that mature over time. The value of this compensation is dependent upon total shareholder return performance factors, which includes appreciation in our share price. The loss of the services of key people could adversely affect our business and operating results.

We also believe that our future success will depend in large part on our ability to attract and retain highly skilled technical and managerial employees. Changes in the labour market activity and work environments as a result of the pandemic continue to present additional risks including: (i) a shortage of qualified people in areas that are critical to our operations, (ii) rapidly shifting employee or candidate expectations regarding pay and benefits, work location or other work attributes which hinders our ability to source required talent quickly, and (iii) a potential decline in performance or productivity for some people who cannot adapt to hybrid work conditions and/or health and safety protocols and policies. Each of these risks could negatively affect our business and operational results. To mitigate these risks, we are investing in enhanced recruiting tools and practices that support robust and diverse candidate sourcing, investing in talent assessment and development tools to ensure we retain top talent, and developing hybrid working guidelines and a future of work strategy that accommodates diverse employee needs and preferences.

Evolving social conditions have also heightened employee expectations regarding ED&I practices, which contribute to an employee’s desire to join or stay with an organization. In response, we developed an employee-led ED&I Strategic Advisory Council and recently launched our first enterprise ED&I strategy which builds on the information and feedback provided in our 2020 ED&I employee survey. This strategy aligns with our organizational values and promotes an inclusive culture of belonging for all. Please see **Equity, Diversity and Inclusion** under **OUR PEOPLE** for further details on our overall ED&I strategy for TMX Group.



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INFORMATION SECURITY/CYBERSECURITY & SYSTEM AVAILABILITY

At TMX Group, we are committed to running resilient systems across our trading, clearing and data platforms. We focus on managing business continuity and technology risks to run reliable and efficient markets.

Per SASB Standards, TMX Group’s 2021 and 2020 performances were as follows under the topic “Managing Business Continuity & Technology Risks”.

Accounting Metric		Unit of Measure	2021	2020
Market Disruptions	Number of significant market disruptions	Number	—	1
	Duration of downtime	Hours	n/a	2 hours
Data Breaches	Number of data breaches	Number	—	—
	Percentage involving personally identifiable information (PII)	Percentage	n/a	n/a
	Number of customers affected	Number	n/a	n/a

INFORMATION & CYBERSECURITY GOVERNANCE

TMX Group has a dedicated Information Security Organization (ISO), led by our Chief Information Security Officer (CISO). The ISO develops and manages our information security services, including cybersecurity oversight for IT and business operations, data management, application development and maintenance functions. Reporting to the CISO are the: Director of Security Operations Centre and Director of Governance, Risk and Compliance and Identity and Access Management. All ISO employees have relevant security certifications or training, and maintain professional contact with groups specializing in security. All ISO employees take ongoing professional training.

SECURITY MEASURES AND DATA PRIVACY

TMX Group has an Information Security Policy, which establishes business risk management objectives, as well as roles and responsibilities for managing security risks.

For information on our technology risks, please see **Cybersecurity and Information Technology** under **GOVERNANCE & RISK**.

TMX Group’s information security program is aligned with ISO27001, National Institute Standards and Technology (NIST) and industry common practices, and is overseen by several Canadian regulators.

The Information Security program is rooted in the Information Security Policy which is available to all employees. The most recent review of the Policy was completed in January 2022. Information security Technical Standards leverage industry best practices, such as the Computer Security Institute (CIS) standards, where available.

The policies and standards are reviewed and updated as needed. The policies and procedures encompass information security/cybersecurity training and awareness programs for employees including an escalation process, specialized technical training for IT and information security staff, and monthly and quarterly CISO reports to all business units executives as well as semi-annual CISO presentations to the board.

All employees who have access to sensitive information (business or technical) are required to use two factor authentication solutions and obtain access through encrypted communication channels (VPN).



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TECHNOLOGY

TMX Group has a Privacy Policy and a Chief Privacy Officer. The employee code of conduct contains provisions for confidential data handling.

- Periodic Threat and Risk Assessment
 - Asset and Information Management
 - Human Resources Security
 - Physical and Environmental Security
 - IT Operations Management
 - Access Control
- Application Security
 - End User Device Security
 - Network Security
 - Privacy
 - Threat Management
 - Server Security
 - Data Loss Prevention

All technology solutions and products at TMX Group undergo cybersecurity vulnerability assessment and penetration tests. This includes any vendor based products and partnerships.

CUSTOMER PRIVACY

TMX Group obtains informed consent (including regarding the nature of information captured) for the personal information it uses, collects and discloses in the course of its operations, except to the extent otherwise required or permitted by law. Individuals may give, withhold, or withdraw their consent to TMX Group’s use, collection and disclosure of their personal information.

The following is available to customers with regards to a customer’s ability to decide how private data is collected, used, retained and processed:

- Opt-out option is available
- Opt-in consent is required
- Request access to data held by TMX Group
- Request their data be corrected

INCIDENT RESPONSE AND BUSINESS RESILIENCY

TMX Group’s Security Operations Centre operates on a 24x7x365 basis to detect, triage and respond to actual attacks or incidents. There is an established incident management process, aligned with the U.S. National Institute of Standards and Technology’s computer security incident handling guide. The process is tested annually.

TMX Group has established a business disaster recovery program. Formal business continuity procedures are developed and documented. Disaster recovery is tested twice a year on average, and the business continuity plan is updated and tested annually. Back-up data is stored under controlled conditions and available only to authorized employees.

For a description of our risks, please see **Business Resilience** under **GOVERNANCE & RISK**.

CLOUD CAPABILITIES

Our investments in new enterprise technology platforms and services have digitized the way we work. This digitization has, in the vast majority of situations, provided us with the option to work remotely and reduce both paper and travel, as well as reduce the need for printed material in meetings. Our cloud working capabilities have been proven throughout the COVID-19 pandemic.

In the next phase of our cloud journey, TMX Group will look for ways to deliver services to our global clients directly within their digital ecosystems to enable faster access and enhanced delivery methods to open up a larger ecosystem of cloud native solutions around compliance, market data, and order execution.



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OUR PEOPLE

Our people power our success. We are a place where talented people never stop learning and working together to make an impact and share in the rewards of our success.

Talent and culture is one of TMX Group’s four strategic focus areas. Investing in our people is critical to both fulfilling our employee promise and to fostering long-term sustainable growth. At TMX Group, we are committed to a respectful and inclusive workplace within which we can engage in meaningful and fulfilling work. We believe that investing in our people through career development opportunities, a competitive total reward structure, and recognition is fundamental to ensuring we attract and retain the best talent.

In 2021, we placed significant focus on employee engagement and organizational culture. Our key initiatives included:

- Defining our high performance culture, including the establishment of our new enterprise purpose “To make markets better & empower bold ideas”, and our core values of client-centric, courage and trust.
- Developing and launching our first Equity, Diversity & Inclusion (ED&I) strategy in partnership with our employee-led ED&I Council.
- Continuing to support employees working both on-site and remotely with social events, enhanced mental health benefits, additional time off, and technology allowances to assist with work from home setups, among others.
- Planning for our return to office and building our future hybrid working model.

ADDITIONAL INFORMATION

- 2022 Management Information Circular
- Employee Code of Conduct
- Respectful Workplace Policy
- Human Resources Committee Charter

¹⁸ The last employee engagement survey was conducted in 2018 with a favourability score of 52%.

¹⁹ Compared with results from 2018 employee engagement survey.

²⁰ Gartner Unified Benchmarking Platform: Turnover Benchmarking (Industry: Financial Services) As reported by HR Metrics: Turnover Benchmarking



Our culture is the foundation to achieving our business strategy and driving sustained employee engagement. In 2022, we moved our culture forward with our Purpose and Values, and our engagement with our employees has never been better. We continue to focus on values based leadership, creating inclusive and transformational work environments, and providing continual opportunities for our employees to grow and thrive.



Cindy Bush,
Chief Human Resources Officer

OUR PEOPLE SNAPSHOT

Topic	Indicator		2021	2020
Equity, Diversity and Inclusion	Positions Held by Women	Senior executives	25%	25%
		Executives	26%	38%
		All other employees	39%	37%
	% Of employees reporting “I feel like I belong here”		72%	n/a
	Average Pay Differential (between women and men across all job grades)		1%	<1%
Employee Engagement	Employee Engagement Survey	Engagement Score	74%	n/a ¹⁸
Talent Attraction and Mobility	Voluntary Turnover	Total (Enterprise)	10%	5%
		Male	7%	3%
		Female	3%	2%
	Total Hires		423	282
	Internal Mobility Rate (% of employees with a job change)		20%	17%

Overall, we observed improvement across many key metrics in 2021, including our employee engagement level¹⁹, hiring and internal mobility and overall workforce gender representation. We observed a decline in the percentage of executive roles held by women as a result of turnover, though we remain confident in our ability to meet our 2025 targets (see **Equity, Diversity and Inclusion** for further details on our approach to ED&I).

As experienced by many organizations, there was an increase in voluntary turnover rates in 2021. However, we remain well below 2021 industry averages of approximately 15%²⁰.

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OUR PEOPLE

BUILDING AN INCLUSIVE CULTURE AND WORKPLACE

In 2021, we placed significant focus on continuing to develop our high performing culture. This began with a diagnostic review of our culture through surveys, one-on-one interviews and focus groups with our workforce. Based on this review, we established our new enterprise purpose statement and core values. We engaged all business units to develop team charters to hold ourselves accountable to living our values.

Our Mission, Vision, Purpose and Values

Mission	WHAT WE DO?	We power capital and commodity markets with client-centric, technology-driven global solutions.
Vision	WHERE ARE WE GOING?	To be an indispensable solution for companies around the world to raise capital and the preferred destination for traders and investors to prosper.
Purpose	WHY WE EXIST?	We make markets better & empower bold ideas.
Values	HOW WE DO IT?	Client-centric. Courage. Trust

Our Values



CLIENT-CENTRIC

We collaborate to deliver excellence for our clients.

We are accountable to our clients.

We put our clients at the heart of what we do.



COURAGE

We have the courage to be bold and innovate.

We encourage and embrace straight talk and authenticity.

We learn when we fail forward.



TRUST

We act with unyielding respect and integrity.

We care about each other’s success and wellbeing.

We are inclusive and foster belonging.

EQUITY, DIVERSITY AND INCLUSION

We are committed to leading by example by fostering a fair, diverse and inclusive culture of belonging that results in positive change for the people, communities and markets we serve.

At TMX Group, we actively seek to ensure that our workforce is representative of the communities in which we operate. We believe that diversity and inclusion maximizes performance of individuals, teams and organizations. While diversity and inclusion have always been a priority at TMX Group, over the past two years we committed to developing a long-term strategy to support an inclusive culture and diverse employee population. Our goal is first and foremost to be thoughtful and deliberate in our strategy, so that we focus on initiatives that will have the most meaningful and long-term impact for TMX Group, our people, and the communities in which we work across the globe.

2020

Completed our first ED&I survey to gather demographic data on our workforce, and employee attitudes and beliefs about inclusion at TMX Group.

Established a cross-enterprise employee ED&I Council to develop our long-term ED&I strategy.

2021

Hired a Manager of Equity Diversity and Inclusion.

Developed and launched our first ED&I strategy and operational plan.

Supported a proposal to report to shareholders on our progress on the development of internal programs and policies that support Indigenous employees, businesses, communities and other stakeholders.

Became a Canadian Council for Aboriginal Business (CCAB) member and commenced our participation in the Progressive Aboriginal Relations (PAR) Program.

Recognized by Women in Governance as a parity-certified organization, and moved from Bronze status in 2020 to Silver status in 2021.

Partnered with Women in Capital Markets to provide TMX women with industry mentorship opportunities.

Implemented Textio - a language processing tool that reduces bias in our job descriptions - resulting in an average 40% reduction in biased language.



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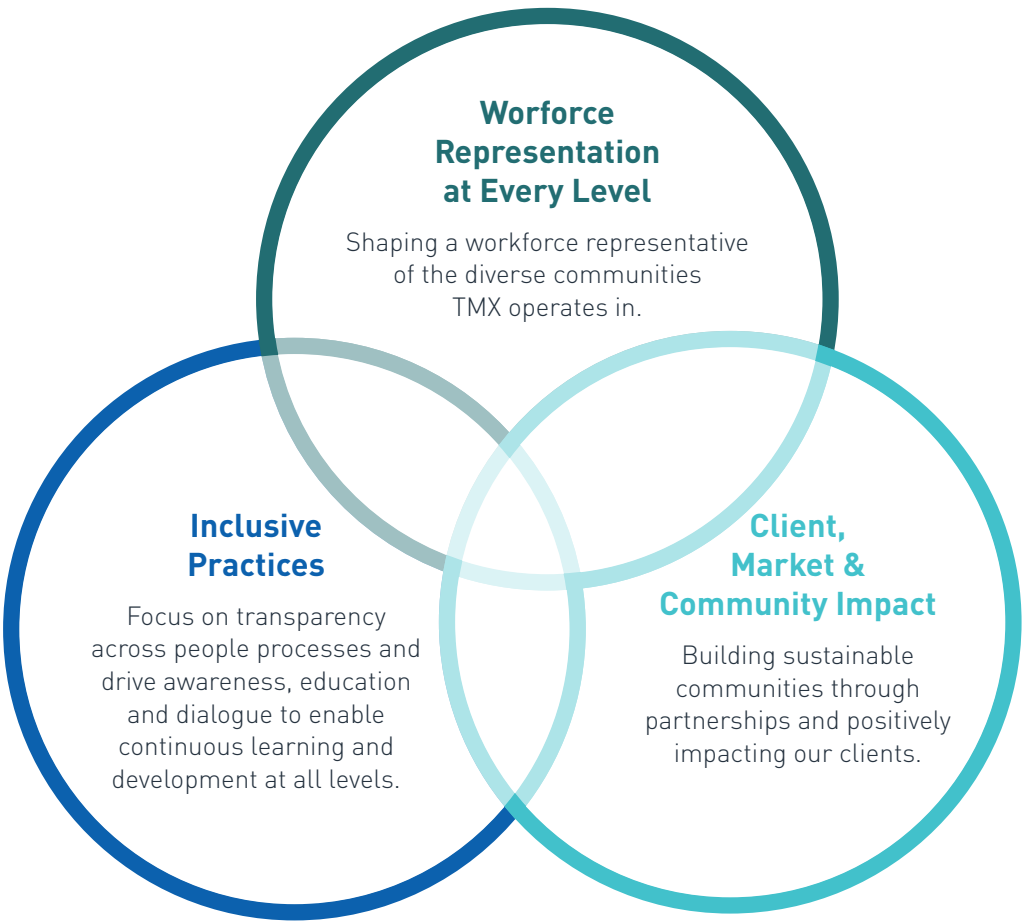
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BUILDING AN INCLUSIVE CULTURE AND WORKPLACE

OUR ED&I STRATEGIC PILLARS



WORKFORCE DIVERSITY

Our strategy includes a continued focus on promoting gender equality within our overall workforce (defined as 40% - 60% women or men), and particularly at executive levels. We increased our previous goal of at least 33% women in executive positions (both senior executives and other executives) to 40% women by 2025. As at December 31, 2021, approximately 26% of executive positions were held by women, which represents a decline from 35% a year prior. With a relatively small executive population, we do observe a high degree of volatility in this statistic when the composition of our executive team changes. We continue to focus on ensuring we have diverse candidate slates for executive level roles and ensuring the continued development and advancement of women internally within the organization to support the achievement of our new targets.

POSITIONS HELD BY WOMEN

We continually seek opportunities to recognize and celebrate the achievements and contributions of women in Canada and globally. Each year, we mark International Women’s Day through “Ring the Bell for Gender Equality” which celebrates the achievements of remarkable women who lead companies listed on our exchanges, as well as raising awareness of gender equality and sustainable development.

TMX Group is also proud to support various initiatives within our capital markets ecosystem, which align and further support our values and guiding principles around diversity and the advancement of women. We partner with Women in Capital Markets and Women in Governance, and also partner with organizations that promote the advancement of women within our industries including Women Who Rock (Mining).

In addition to balanced gender representation, our strategy also focuses on enhancing representation across all underrepresented groups, particularly across our BIPOC communities. In 2022, our employee-led ED&I council will be participating in a design thinking series to better understand challenges, root causes, opportunities and actions that will enhance both representation and inclusion for underrepresented groups.

December 31, 2021		Target by 2025	
Senior executives*	2 of 8 (25%)	11 of 43 (26%)	40% women-identifying at the executive level
Executives*	9 of 35 (26%)		
All other employees*	611 of 1,557 (39%)		40-60%

* Includes permanent employees only.

TMX Group has partnered with Women in Governance’s Parity Certification Program to complete a diagnostic in 2021 of our current state in promoting gender equality in the workplace. This program provides us with additional insights into best practices on how we can continue to progress the representation and advancement of women across all our business lines. Following its evaluation, Women in Governance raised TMX Group’s certification level to “Silver” in 2021 (up from “Bronze” in 2020). Our CEO, John McKenzie, will be co-chairing the 2022 Women in Governance Gala on May 24, 2022.



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GENDER PAY EQUITY

We conduct an annual equal pay analysis to ensure that men and women who perform equivalent jobs are paid on an equivalent basis. We use a gender-neutral job evaluation tool and job grading structure that serves as the foundation for our compensation structure. Although there are slight variances by grade, the average pay differential between women and men across all job grades is approximately 1%.

REVIEWING OUR INTERNAL PRACTICES AND PROCESSES

Following the establishment of our ED&I strategy, we identified recruitment as a key internal process that supports our workforce representation and inclusion goals. We partnered with Textio - a language processing tool - to ensure job descriptions are inclusive and free of any unconscious bias, proving that every word counts when it comes to building a culture of inclusion. We also partnered with Mogul, an innovative new platform that allows our recruiters to source top, diverse talent.

In addition, we significantly enhanced our **Respect in the Workplace Policy** and our **Employee Code of Conduct** to embed our new core values and reflect our commitments to creating a safe and inclusive workplace for all our employees.

2022 INTERNAL PRACTICES AND PROCESSES PRIORITIES

- Gain a better understanding of our diversity in hiring practices through the collection of self-identification demographic data in our Applicant Tracking System.
- Formation of a working group to review our promotion practices to ensure equity in progression and internal mobility opportunities.
- Updating our Diversity Policy to ensure it reflects our new commitments and objectives.

CLIENT, MARKET AND COMMUNITY IMPACT

The third pillar of our ED&I strategy focuses on building strong relationships with community partners to create meaningful impact for the communities in which we operate.

At our annual and special meeting of shareholders held on May 12, 2021, we supported, and our shareholders approved, the Atkinson Foundation’s amended shareholder proposal under which the board committed to reporting to shareholders on TMX Group’s work on:

- i. the development of internal programs and policies on ED&I, including those that encompass current and prospective Indigenous employees, and relationships with Indigenous communities;
- ii. our review of procurement from Indigenous-owned businesses, and those owned by other underrepresented groups, and establishing appropriate disclosure practices and objectives; and
- iii. our engagement with qualified Indigenous and other organizations to support this work so that these programs can be shown to meet standards that are appropriate for the company and, wherever possible, aligned with commonly-used frameworks and to report in an ongoing way that supports investors’ ability to determine the breadth, depth, and content of these programs.

Later in 2021, we began preparing for our participation in the Progressive Aboriginal Relations™ (PAR) certification program. PAR is a CCAB certification program which provides third-party, independent evaluation of corporate performance in four key areas: leadership actions, employment, business development and community relationships. TMX Group believes in the values and the ability of the PAR program to build effective relationships with Indigenous communities to create economic and social opportunities.

We established a cross-functional team from across the organization to commence work on the first phase of the PAR program. The working group completed PAR training with the CCAB and has begun working on implementing our phase 1 commitments (being a commitment statement from TMX Group leadership, an Indigenous relations policy, cultural awareness training, and the identification of Indigenous community partners). We anticipate completing phase 1 of the PAR certification program in Q3/2022.

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2021 INDIGENOUS COMMUNITY IMPACT HIGHLIGHTS

- We celebrated National Indigenous Peoples Day on June 21, 2021, by virtually opening the market with members of Anishnawbe Health Foundation, which combines western medicine and Traditional Healing to offer healthcare services to Indigenous people living in Toronto. TMX Group also donated \$50,000 towards the new Anishnawbe Health Foundation Toronto facility. The building will be the first project completed on the site of a new Indigenous Community Hub in Toronto.
- We marked the first National Day for Truth and Reconciliation on September 30, 2021 by virtually opening the market with the leadership team from CCAB. The team was joined by Bear Standing Tall who provided an honour song for the survivors of Residential Schools and those children who did not return home. Makhos Inc., a community and consulting group specializing in supporting Indigenous Peoples, hosted a 90 minute interactive awareness session to give context to the significance of this day, and help build awareness of the history of Indigenous relations in Canada. This session was available globally to all employees of TMX Group.
- Our CEO, John McKenzie, participated in a discussion on Reconciliation and Corporate Canada: C-Suite Reflections on Rising from Rhetoric to Real Progress with Tabatha Bull, CEO of CCAB, at the 2022 virtual SHARE Investor Summit.
- TMX Group has also made several investments in Indigenous organizations and communities. See **COMMUNITY IMPACT** section for further information.

LOOKING AHEAD: TMX GROUP AND INDIGENOUS RECONCILIATION

Our senior leadership team recognizes that, as a key player in the Canadian capital markets ecosystem, TMX Group has an important role to play in the reconciliation process and in empowering Indigenous economies and communities. We are in the process of formalizing our commitment to reconciliation by engaging our senior leaders in identifying areas of opportunity for TMX Group to create long-term sustainable change as well as defining our vision and commitments. These will be documented in a Reconciliation Action Plan (RAP) that sets out measurable tasks that we will commit to over the next few years. Our RAP will integrate the PAR requirements referenced above.

2021 WORKFORCE HIGHLIGHTS

Employee Location*

Austria	2.96%
Canada	81.06%
Germany	1.12%
Hong Kong	0.06%
Singapore	0.56%
United Kingdom	13.63%
USA	0.61%

* Includes all permanent, hourly, contract and contingent workers.

Workforce Breakdown*

Permanent	89.39%
Hourly (Fixed Term Contract)	4.69%
Consultant	3.80%
Contractor	2.12%

* Includes all permanent, hourly, contract and contingent workers.

Gender*

Female	39.37%
Male	59.50%
Undisclosed	1.13%

* Includes all permanent and hourly workers. It excludes contract and contingent workers.

Age*

<24 years	4.22%
25 - 34 years	25.95%
35 - 44 years	24.88%
45 - 54 years	25.95%
55 - 64 years	16.63%
65 +	2.38%

* Includes all permanent and hourly workers. It excludes contract and contingent workers.



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ATTRACTING AND RETAINING TALENT

At TMX Group, we enjoy a fast-paced and dynamic work environment where each employee has an impact on our day-to-day business. We invest in our approximately 1,600 employees by providing challenging opportunities, skill development programs, and recognition for performance.

TALENT ATTRACTION

TMX Group was recognized by **Greater Toronto’s Top 100 Employers in 2021** based on our performance in the following areas (i) physical workplace; (ii) work atmosphere and social; (iii) health, financial and family benefits; (iv) vacation and time-off; (v) employee communications; (vi) performance management; (vii) training and skills development; and (viii) community involvement.

Our robust and diverse candidate pipeline averages approximately 24,000+ candidate applications per year. At the onset of the COVID-19 pandemic, 95% of our workforce transitioned to remote work and so did our recruitment and onboarding practices. In 2021, we onboarded 423 new hires globally and ensured that these new hires felt supported, welcomed and set up for success, regardless of their location.

	2021	2020
Total Job Requisitions	564	329
Total Applicants	24,735	28,255
Total Hires ²⁶	423	282

2022 RECRUITMENT PRIORITIES

- Working to refresh our employer brand to help us attract and retain the best talent, and authentically communicate to current and potential employees what’s at the heart of being part of Team TMX.
- Refresh and enhance our student programs enterprise wide, including adding new streams and opportunities for our Rotational Associate Program.
- Continue our journey of embedding ED&I best practices into our recruitment processes, including introducing new guidelines around diverse representation in interviews, improving competency based interview guides and engaging new vendors and partners representing underrepresented groups.
- Improve our ability to report meaningful data / metrics, including enhancing existing recruitment dashboard to facilitate tracking and reporting of key recruitment metrics.

ENGAGING WITH OUR PEOPLE

By regularly engaging with our workforce to gather ideas and feedback, we are better able to design and deliver the experiences and work environments that attract talent and develop and empower our people.

We provide a range of forums to engage with our workforce including annual and pulse engagement surveys, quarterly global employee town halls, social events, dedicated monthly people manager calls and new hire welcome sessions led by our CEO.

In 2021, we completed an enterprise-wide engagement survey with an overall engagement score of 74% (up from 52% in our last survey in 2018). We also saw marked improvements in key categories (see highlights box). We enabled all managers to access their own team’s results to assist with more targeted action planning.

Additionally, we conducted 12 pulse/topical employee surveys throughout the year to listen to employees which informed adjustments to our routines and helped us deliver new programs and resources based on their feedback. We also held 27 CEO led employee meetings with 75%+ participation.

²⁶Includes permanent, contract and contingent workers (includes Trayport).



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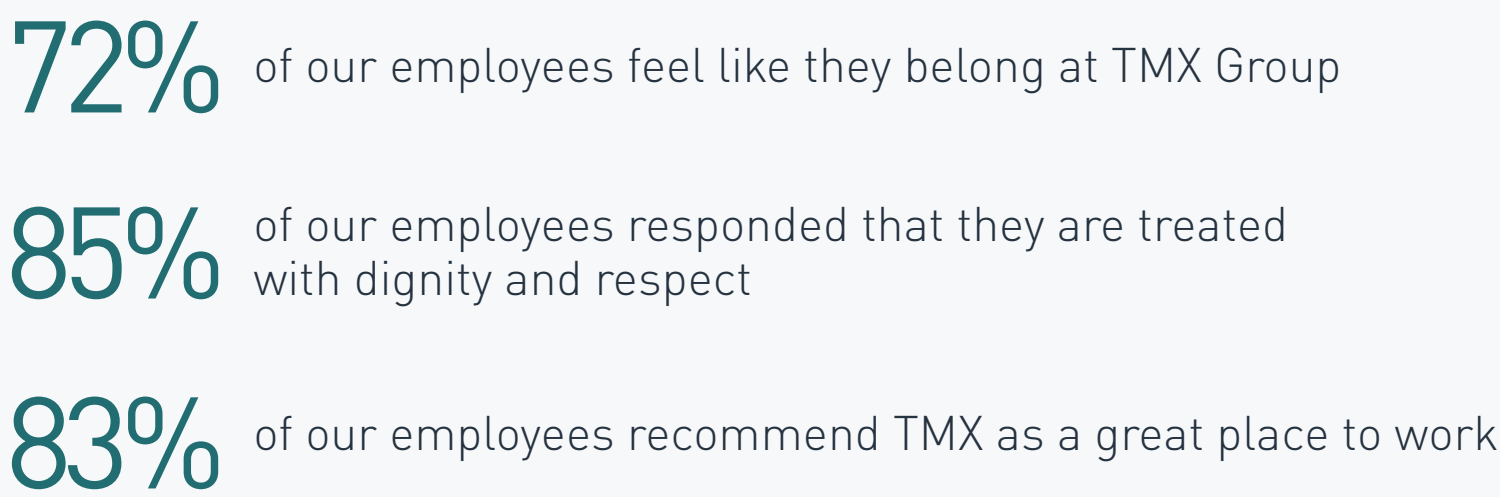
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ATTRACTING AND RETAINING TALENT

2021 ENGAGEMENT HIGHLIGHTS



EMPLOYEE TURNOVER AND INTERNAL MOBILITY

We regularly monitor employee turnover and internal movement and conduct exit interviews to inform our policies and practices. Although we observed an increase in voluntary turnover in 2021, our turnover rate for the last 3 years has trended well below financial industry averages of approximately 15%²⁷.

We are focused on developing our internal talent, with over 20% of employees experiencing a job change in the last year.

Voluntary Turnover Rate²⁸

	Female	Male	Enterprise	Internal Mobility Rate (% of employees with a job change)
2021	3%	7%	10%	20%
2020	2%	3%	5%	17%

TOTAL REWARDS AT TMX GROUP

At TMX Group, compensation is linked to the successful achievement of measurable business and individual results. Our compensation structure comprises a competitive base salary and a variable annual bonus structure (STIP) that is based on a formal objective setting process aligned to our organizational objectives. Other rewards include our benefits, pension, employee share purchase plan (ESPP), and wellness programs.

Compensation for executives is carefully designed to link executive pay with our business strategy, company and individual performance and shareholder returns – all within a well-defined risk framework. See TMX Group’s **2022 Management Information Circular** for further details on our executive compensation programs.

ESG is fundamental to TMX Group’s long-term sustainability as both an organization and as an operator of global capital markets. In 2021, the committee and management completed a thorough review of different approaches to linking executive compensation to ESG performance. For 2022, there was agreement to increase the focus on ESG topics in the short-term incentive plan by including specific individual and team-based ESG goals in the individual performance objectives for the CEO and senior executives.

EMPLOYEE SHARE PURCHASE PLAN

At TMX Group, we encourage share ownership through our leading Employee Share Purchase Plan (ESPP) - “Think like an Owner. Be an Owner”. All permanent full-time and regular part-time employees of TMX Group are eligible to participate in the ESPP (where permitted by local laws). Participation rates are approximately at 86% in North America, 80% in Singapore, and 49% in the United Kingdom. In early 2021, we also implemented the program in our Vienna office, where participation is currently at 37%. In early 2022, our share purchase program was introduced to our employees in our office in Germany.

In 2021, TMX Group was the recipient of the Global Equity Organization’s Award for “Best Plan Communication” based on the success of our TMX Group share ownership campaign, as well as our communications to employees with respect to our recent plan enhancements to increase the employer matching contribution by 40% (up to a maximum of \$3,500) and increased the maximum employee contribution rate to 15% of salary (up from 10%).

²⁷ Gartner Unified Benchmarking Platform: Turnover Benchmarking (Industry: Financial Services) As reported by HR Metrics: Turnover Benchmarking
²⁸ Turnover rates exclude contract and contingent workers.



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TOTAL REWARDS AT TMX GROUP

HEALTH BENEFITS

TMX Group offers a comprehensive range of employee health and wellness benefits to cultivate a healthy and productive work environment, providing resources and tools that our employees need to help enhance their overall emotional, physical and financial well-being.

In 2021, we enhanced our mental health practitioner coverage by reclassifying it as a mental health benefit (separate from the “paramedical benefit” category), and increased coverage to 100% up to a maximum of \$1,500 per calendar year (this includes, psychologists, psychotherapists, family therapists, and clinical counselors).

In 2022, we are focused on reviewing our time off and leave policies to ensure they remain competitive and are inclusive for all employees.

The Canadian HR Reporter awarded us with a 2021 award for TMX’s innovative wellness strategy during the COVID-19 pandemic. Our commitment to wellness was also recognized internationally with our Trayport office receiving the award for Best Wellbeing Strategy at the Engagement Excellence Awards.

EMPLOYEE HEALTH & SAFETY

TMX Group is committed to promoting and maintaining a safe and healthy work environment for our people as well as anyone who visits or works on TMX Group premises. All employees have a duty to identify and report any unsafe or unhealthy workplace practices or dangers to their manager or a Joint Health and Safety Committee representative. In compliance with the Provincial Occupational Health and Safety Acts, TMX Group maintains a Joint Health and Safety Committee. The committee is an advisory body that helps to raise awareness of health and safety issues, recognizes workplace risks, and provides recommendations on addressing those risks.

EMPLOYEE LEARNING AND DEVELOPMENT

We empower our people to own their career by pursuing both internal and external development opportunities. Where aligned with business needs, we support employees financially in the pursuit of professional designations or new skill development. Further, we offer a range of development programs to assist employees in achieving their personal and professional goals which are described below.

LINKEDIN LEARNING

TMX Group has granted each employee unlimited access to this on-demand learning portal that is intended to support their professional and personal skill development. The service includes unlimited convenient access with more than 16,000 video tutorials in a variety of languages covering business, creative and technology topics. In 2021, our employees engaged with 20,660 individual lessons and 3,129 courses.

2021 LEARNING AND DEVELOPMENT HIGHLIGHTS

- **485** employees participated in voluntary learning and development programs.
- Employees logged **2,021** independent learning hours in LinkedIn Learning.
- Learning and development programs received an average rating of **4.5 (out of 5)** based on employee feedback.
- We provided additional training in alignment with our ED&I strategy focused on understanding unconscious bias and strategies to overcome bias in the workplace.

CLIENT FIRST ACADEMY

This year we continued to run the “Client First Academy” program, a training program in partnership with an external provider. This program allows participants to adopt a consistent approach to engaging with clients in a meaningful way and build foundational knowledge of enterprise products and services. In 2021, 28 students attended the 4-part interactive session on topics such as managing self-talk, facilitating difficult discussions, developing strong client relationships, understanding different social styles, and influencing tactics for effective management.

MANAGEMENT EXCHANGE

A collaborative program for people managers intended to enhance the core management skills of our leaders and enable our teams to perform and collaborate at their best. Over a four month period, participants come together from across the organization and dedicate five days to coursework, supplemented by additional exercises in the intervening periods. In 2022, we are enhancing the program to provide greater accessibility to our global workforce and support virtual learning.

In addition to the above development programs, in 2021 we provided additional training in alignment with our ED&I strategy focused on understanding unconscious bias and strategies to overcome bias in the workplace.



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COMMUNITY IMPACT

We are proud to live, work and give in our local communities. We strive to be generous with our time, money and resources and together, we believe that we can make our communities better and make an impact. In 2021, TMX Group donated approximately \$1.5 million and approximately £16,230 to charitable organizations in 2021 through its charitable giving programs across the globe.

IMPACT CHARITABLE GIVING PROGRAM (CANADA)

Our Impact Program, launched over three years ago, focuses on Canadian charities within the local communities we operate. Our employees have the opportunity to vote for a charitable cause that they believe TMX Group should support and that aligns with our values. A committee of employees leads our charitable giving program by reviewing charitable requests, allocating funds, and organizing individual and team volunteering activities. In 2021, we donated over \$500,000 to 46 organizations in Canada that fit under our theme of Community & Social Welfare. \$100,000 of that amount was devoted to charities that focus on ED&I and allocated under the guidance of our ED&I Council (see Equity, Diversity and Inclusion in **OUR PEOPLE**).

SUPPORTING OUR INDIGENOUS COMMUNITIES

TMX Group has made several contributions to Indigenous organizations and communities including:

- \$50,000 towards the new Anishnawbe Health Foundation Toronto facility which will be the first project completed on the site of a new Indigenous Community Hub in Toronto.
- \$10,000 to the Downie and Chanie Wenjack Fund, which aims to build cultural understanding and create a path toward reconciliation between Indigenous and non-Indigenous peoples.
- \$20,000 to Water First, which helps address the water crisis facing many Indigenous communities through education, training and meaningful collaboration (2022).

SHORCAN BROKERS LIMITED (CANADA)

Giving back to the community is an important part of Shorcan's culture. Each year in January, we host the Shorcan Charity Day on which the firm donates all revenues for the day to various charitable organizations in our local communities. Shorcan held its 23rd Annual Charity Day on January 21, 2021 raising over \$950,000 for a range of designated charitable organizations.

UNITED WAY/CENTRAIDE LEADERSHIP CAMPAIGN (CANADA)

TMX Group supports the United Way and Centraide on an annual basis through a dedicated leadership campaign. Our 2021 campaign raised \$31,762.80 through Director level employees and above in Canada.

TRAYPORT (LONDON, VIENNA, SINGAPORE)

With much of 2021 spent working remotely, Trayport's charitable efforts were focused on supporting local causes close to our hearts. This included a Christmas program supporting our local borough via First Love Foundation and a family via Make A Wish Foundation Vienna, as well as an employee-led campaign with Men's Health charity 'Movember'. Trayport hosted its first ever 'Global Give Back' in 2021, which brought employees together to participate in team activities in aid of charity. Our Global Give Back Day was hosted across London, Vienna and Singapore, and our seven winning teams selected 16 charities to support (including Cardiac Risk in the Young, Cancer Research UK, and Association of Vienna Women's Shelters). Trayport donated a total of £16,230 in 2021.

CORPORATE MATCHING (NORTH AMERICA)

All permanent employees are eligible to participate in our corporate matching program. TMX Group matches employee donations to charitable organizations up to a maximum of \$200 per employee for charities from any of the following categories: education, social services, health research, arts and culture. In 2021, we matched a total of \$6,144 as part of this program.

VOLUNTEERING WITH IMPACT DAYS (WORLDWIDE)

Full-time and part-time permanent employees across all locations receive two "Impact Days" per year which are paid days off to volunteer for any charity that is important to them. The COVID-19 pandemic did not impact our employees' charitable spirit as they found ways to donate their time to their communities. In 2021, 106 employees volunteered for the community through Impact Days. Employees created care kits for Youth Without Shelter and the United Way, mentored youth by facilitating JA's Dollars with Sense programs, volunteered with Newcomer Women Services' Sisters Prosper program, and donated time to Food Banks Canada.



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Addressing climate change has become a pressing global issue and represents a long-term threat to economic prosperity and life on our planet. At TMX Group, we recognize that we have an important role to play in addressing the climate crisis in the following ways:



Supporting clients in their net-zero journeys, investing in issuer education and facilitating ESG information

Engaging with regulators and market participants to advocate for harmonized reporting

Making meaningful shifts in our operations to combat greenhouse gas emissions

In December 2021, we published our inaugural **2020 TCFD Climate Report** as a means to communicate our efforts to understand how climate change could impact our business and how we are integrating climate considerations into our core business activities. In this report, we detailed our initial approach to identifying, assessing and managing our climate risks and opportunities. We also outlined the steps we are planning to take to reduce TMX Group's greenhouse gas (GHG) footprint and our future priorities including:

- Performing scenario analysis on the impacts of climate change on our business
- Setting emissions reductions targets
- Implementing an internal carbon pricing program
- Increasing the consumption of our energy from renewable sources

INDUSTRY INVOLVEMENT

We engage with organizations within the climate finance community and are members of the following groups:

- Responsible Investment Association
- UN Sustainable Stock Exchanges
- World Federation of Exchanges Sustainability Working Group
- Climate Engagement Canada
- Canadian Champions for Global Sustainability Standard²⁹

OUR FACILITIES

We are working to responsibly manage and improve the environmental impact of our business operations. The main source of our environmental footprint is from our buildings. All of our major corporate sites in Canada are Leadership in Energy and Environmental Design (LEED®) Platinum certified and, as of December 30, 2021, 76% of TMX Group's total office footprint was LEED® Platinum certified. LEED® is the most widely used green building rating system in the world and LEED® certification is a globally recognized symbol of sustainability achievement and leadership.

TMX Group Office LEED® Certifications

- 76% of TMX Group's office space is LEED® Platinum certified
- Our Toronto office is LEED® Platinum certified Class AAA
- Our Montreal and Calgary offices are LEED® Platinum certified
- Our TMX Market Centre™ is LEED® Gold certified

Our Trayport London office has the ISO 14001 environmental management systems³⁰ accreditation.

²⁹ Letter from the Deputy Prime Minister to the Chair of the Board of Trustees of the IFRS Foundation

³⁰ <https://www.iso.org/standard/60857.html>

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OUR GHG FOOTPRINT

We engaged a third-party consultant to calculate TMX Group’s Scope 1, 2 and 3 emissions from 2019 to 2021³¹. All major TMX Group offices and facilities were covered, as were GHG emissions associated with business air travel. Our GHG inventory follows the “operational control” consolidation approach of the Greenhouse Gas Protocol Corporate Standard. Under this approach, it is required to account for 100% of the emissions from operations, facilities, and sources over which TMX Group has operational control.

Inventory Category	Activity	2021	2020	2019	% Increase / (Decrease) ³²
Scope 1	Natural Gas and Diesel ³³	656	507	624	5%
Scope 2 (Location-Based)	Electricity and Chilled Water	1,265	1,332	1,265	—%
Scope 3	Business Air Travel ³⁴	33	105	598	{94}%
Gross Emissions (tCO ₂ e)		1,954	1,944	2,487	{21}%

Performance	Metric	2021	2020	2019	% Increase / (Decrease) ³⁵
Total Emissions (tCO ₂ e)	Number of FTEs	1,576	1,383	1,287	22%
	tCO ₂ e per FTE	1.2	1.4	1.9	{37}%
	Revenue (\$ million)	981	865	807	22%
	tCO ₂ e per revenue (\$ million)	2.0	2.2	3.1	{35}%

In 2021, Scope 2 emissions associated with electricity consumption and chilled water was the single largest source of emissions for TMX Group, followed by Scope 1 emissions from natural gas and diesel and Scope 2 emissions from business air travel. In 2021, our Scope 3 emissions from business air travel dropped significantly compared to our 2019 baseline year due to the COVID-19 pandemic.

We have purchased and retired voluntary carbon offsets for 2020 and 2021 through The Voluntary Climate Marketplace, powered by Trayport, to offset our annual gross emissions. We intend to neutralize our GHG footprint every year going forward.

In 2019 and 2021, Scope 2 emissions associated with electricity consumption was the single largest source of GHG emissions for TMX Group. We are actively looking to source our power from renewable sources to combat our global annual consumption. We are also in the initial stages of exploring setting a science-based target for our GHG emissions.

³¹ On August 12, 2021, we completed the acquisition of AST Investor Services Inc. (Canada), and its subsidiary AST Trust Company (Canada) [collectively, AST Canada]. 2019 and 2020 total carbon emissions have been restated to reflect the acquisition of AST Canada.

³² % Increase/(Decrease) is calculated between 2021 and 2019, our baseline year.

³³ Information was collected from all facilities except Vancouver, Bremen, Singapore, AST Vancouver and AST Calgary. Assumptions were used to model the associated emissions where data was either unavailable or incomplete.

³⁴ Business air travel data from the AST Canada locations were not included due to data limitations.

³⁵ % Increase/(Decrease) is calculated between 2021 and 2019, our baseline year.

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PROMOTING TRANSPARENT & EFFICIENT CAPITAL MARKETS

Code	Activity	Unit of Measure	2021	2020
FN-EX-410a.1	Halts related to public s of information ³⁴	Number	1,268	1,318
		Duration ³⁵	n/a	n/a
	Pauses related to volatility (Single Stock Circuit Breaker)	Number	133	178
		Duration	665 minutes	890 minutes
	Pauses related to volatility (Market Wide Circuit Breaker)	Number	—	4
		Duration	—	60 minutes
FN-EX-410a.2	Percentage of trades generated from automated trading systems	Our member firms are not required to disclose the firm name or participant type associated with DEA (Direct Electronic Access) clients. As such this cannot be tracked by TMX Group.		
FN-EX-410a.3	Description of alert policy regarding timing and nature of public release of information	TSX Policies Section 416, Section 417, Section 418 of the TSX Company Manual. TSXV Policies TSX Venture Exchange Corporate Policy 3.3 of TSX Venture Exchange Corporate Finance Manual Please refer to Promoting Transparent and Efficient Markets under OUR BUSINESS . TSX and TSXV monitors compliance with the following regulatory requirements: National Instrument 58-101 CSA Staff Notice 51-358 National Instrument 52-110 National Policy 58-201		
FN-EX-410a.4	Description of policy to encourage or require listed companies to publicly disclose environmental, social, and governance (ESG) information	Additionally, TSX monitors compliance with this governance related policy: CSA Multilateral Staff Notice 58-311 The following sections of the TSX Company Manual contain policies regarding governance and disclosure: Section 325, Section 407, Section 408, Section 410, Section 423.6, Section 461.1, Section 461.2, Section 461.3, Section 461.4, Section 716 The following sections of the TSX Venture Exchange Corporate Finance Manual contain policies regarding governance and disclosure: Policy 3.1, Policy 3.2, Policy 3.3		

³⁴ Halts/resumptions in Canada are managed by Investment Industry Regulatory Organization of Canada (“IIROC”) <https://www.iiroc.ca/news-and-publications/halts-and-resumptions>.

³⁵ Depending on the nature of halt the duration can range from hours to months.

³⁶ IIROC is a self-regulatory organization that regulates the activities of brokerage firms and their capital requirements, as well as their business and trading conduct. IIROC also provides regulation services to Toronto Stock Exchange, TSX Venture Exchange and TSX Alpha Exchange, as well as all other Canadian equity marketplaces, monitoring and enforcing compliance with universal market integrity rules. The IIROC Market Surveillance department monitors TSX and TSXV listed issuers’ timely and continuous disclosure and to enforce their relevant policies and procedures related to timely and continuous disclosure.



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MANAGING CONFLICTS OF INTEREST

Code	Activity	Unit of Measure	2021	2020
FN-EX-510a.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	Number	—	—
FN-EX-510a.2	Discussion of processes for identifying and assessing conflicts of interest	Please refer to Conflict of Interest under GOVERNANCE & RISK .		

MANAGING BUSINESS CONTINUITY & TECHNOLOGY RISKS

Code	Activity		Unit of Measure	2021	2020
FN-EX-550a.1	Market Disruptions	Number of significant market disruptions	Number	—	1
		Duration of downtime	Hours	n/a	2 hours
FN-EX-510a.2	Data Breaches	Number of data breaches	Number	—	—
		Percentage involving personally identifiable information (PII)	Percentage	n/a	n/a
		Number of customers affected	Number	n/a	n/a
FN-EX-550a.3	Description of efforts to prevent technology errors, security breaches, and market disruptions	Please refer to TECHNOLOGY .			

ACTIVITY METRICS

Code	Activity	Unit of Measure	2021	2020
FN-EX-510a.1	Average daily number of trades executed by product or asset class	TSX	1,110,147	1,207,349
		TSXV	106,252	48,358
		TSX Alpha Exchange	137,069	139,165
		MX Derivatives	89,234	85,491
FN-EX-000.B	Average daily volume traded, by product or asset class	TSX	413.4 million	458.2 million
		TSXV	260.2 million	209.2 million
		TSX Alpha Exchange	88.3 million	73.9 million
		MX Derivatives	0.6 million	0.5 million



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Please refer to our inaugural **2020 TCFD Climate Report** for detailed information around the core elements of the recommended climate-related financial disclosures:



2021 METRICS AND TARGETS

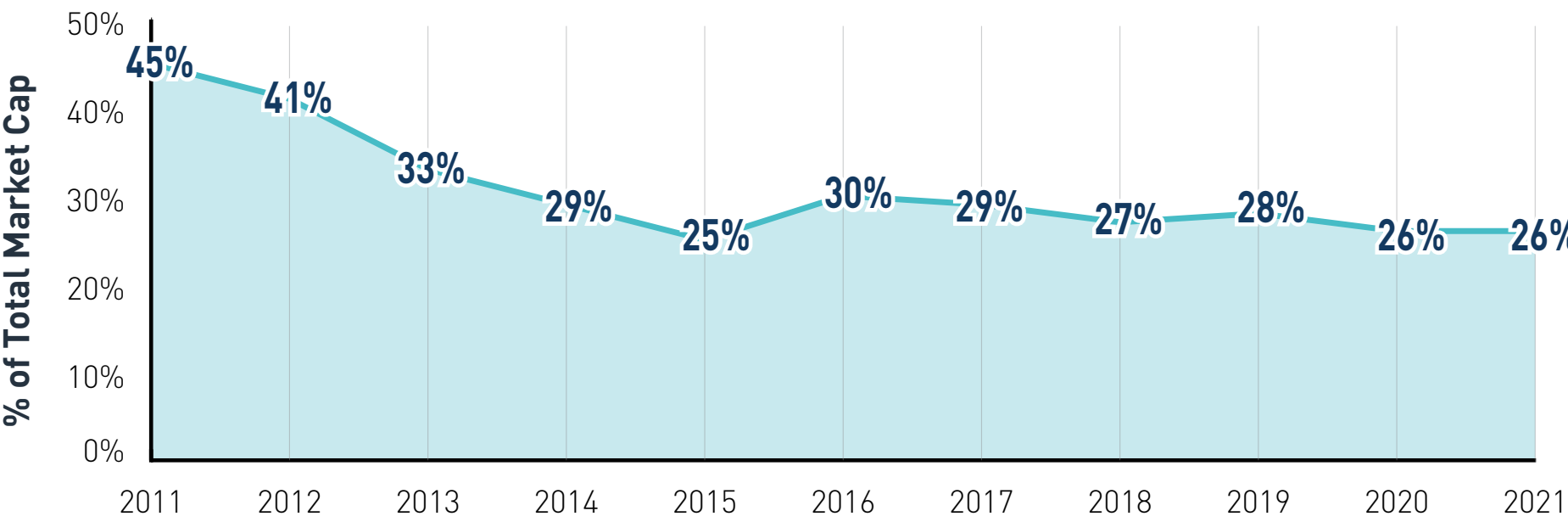
GHG Emissions

Please see **Our GHG Footprint** under **OUR ENVIRONMENT**.

Transition Risks

To measure our exposure to resource-related sectors, we aggregate the activities in the following sectors as calculated by our Market Intelligence Group: mining, oil and gas and utilities and pipelines. On TSX and TSXV, the composition of these resource-related listed issuers as a percentage of our overall market capitalization has shifted over time since 2011 as illustrated below.

Resource-based Issuer Base as a % of Total Market Capitalization (TSX & TSXV):



Sector	Risk Metrics ³⁷	2021	2020
Oil and Gas	% of overall market capitalization on TSX and TSXV	6%	4%
	% of overall volume traded on TSX and TSXV	13%	13%
Mining	% of overall market capitalization on TSX and TSXV	13%	15%
	% of overall volume traded on TSX and TSXV	35%	34%
Utilities and Pipelines	% of overall market capitalization on TSX and TSXV	7%	7%
	% of overall volume traded on TSX and TSXV	4%	4%

Physical Risks

We are evaluating relevant metrics to measure and monitor our exposure to which extent our assets or business activities are vulnerable to physical risks.

³⁷ TSX/TSXV Market Intelligence Group Report (MiG) - December 2021 and December 2020.



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CLIMATE-RELATED OPPORTUNITIES

Sector	Opportunity Metrics ³⁸	2021	2020
Clean Technology and Renewable Energy	% of overall market capitalization on TSX and TSXV	2%	3%
	% of overall volume traded on TSX and TSXV	4%	3%
100% Low-Carbon Mineral Issuers ³⁹	% of overall market capitalization on TSX and TSXV	1% (11% of mining sector)	1% (8% of mining sector)
	% of overall volume traded on TSX and TSXV	9%	6%

Opportunity Metrics	Measure	2021	2020
ESG ETFs ⁴⁰	Number of ETFs	70	44
	Assets Under Management	\$7.2 billion	\$2.4 billion
Trayport Carbon Trading	Number of Participating Firms	102	79
	Number of Participating Traders	327	249

Capital Deployment

We are evaluating relevant metrics to measure and monitor the amount of capital expenditure, financing, and investment deployed toward our climate-related risks and opportunities.

Internal Carbon Prices

To begin to address our Scope 3 emissions, we are planning to introduce an internal carbon pricing program that will assign a carbon price to all business air travel. Proceeds from this internal carbon price, levied on each business unit according to their annual travel, will be used to purchase carbon offsets equivalent to the emissions associated with business air travel.

Remuneration

Our human resources committee is overseeing the introduction of ESG goals into the individual performance objectives of the CEO and senior executives. These will affect their short-term incentive awards starting in 2022. Individual performance objectives for the CEO and members of the senior executive team will include individual and team goals relating to corporate and commercial ESG priorities. This approach allows ESG objectives to be tailored to each role and business unit or corporate function, with goals cascaded down through the organization. See also page 67 in our **2022 Management Information Circular**.

The human resources committee will monitor the company’s progress and performance on ESG initiatives, and will continue to enhance the link between ESG and executive compensation as necessary.

³⁷ TSX/TSXV Market Intelligence Group Report (MiG) - December 2021 and December 2020.

³⁹ Represents a subset of the mining sector that produces exclusively metals and minerals used in the transition to a low-carbon economy. (Copper, Aluminum, Chromium, Graphite, Iron, Lead, Lithium, Manganese, Molybdenum, Silver, Titanium, U308, Vanadium and Zinc). This information is provided for information purposes only. Neither TMX Group nor any of its affiliated companies represents, warrants or guarantees the accuracy or completeness of this information and we are not responsible for any errors or omissions in or your use of, or reliance on, the information provided.

⁴⁰ Source: Market Intelligence Group. ESG ETFs were filtered based on investment strategies that encompass one or all components of ESG.



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FORWARD LOOKING INFORMATION

This ESG report contains “forward-looking information” (as defined in applicable Canadian securities legislation) that is based on expectations, assumptions, estimates, projections and other factors that management believes to be relevant as of the date of this AIF. Often, but not always, such forward-looking information can be identified by the use of forward-looking words such as “plans,” “expects,” “is expected,” “budget,” “scheduled,” “targeted,” “estimates,” “forecasts,” “intends,” “anticipates,” “believes,” or variations or the negatives of such words and phrases or statements that certain actions, events or results “may,” “could,” “would,” “might,” or “will” be taken, occur or be achieved or not be taken, occur or be achieved. Forward-looking information, by its nature, requires us to make assumptions and is subject to significant risks and uncertainties which may give rise to the possibility that our expectations or conclusions will not prove to be accurate and that our assumptions may not be correct.

Examples of forward-looking information in this ESG report include, but are not limited to, our near- and long-term priorities as we continue to integrate our ESG objectives into TMX Group’s corporate strategy, business processes, and investment decisions; the structures, policies and programs that support and promote our issuers’ ESG efforts; our efforts to define our high-performance culture and corporate purpose; our anticipated transition from a 90% remote workforce to a hybrid workforce; our initiative to post sustainable bonds to trade on TSX; our initiatives to link executive compensation to specific ESG metrics and targets; our board diversity targets; our ED&I objectives, initiatives and programs; and our objectives and plans to reduce our GHG footprint.

These risks include, but are not limited to: competition from other exchanges or marketplaces, including alternative trading systems and new technologies, on a national and international basis; dependence on the economy of Canada; adverse effects on our results caused by global economic conditions (including COVID-19) or uncertainties including changes in business cycles that impact our sector; failure to retain and attract qualified personnel; geopolitical and other factors which could cause business interruption (including COVID-19); dependence on information technology; vulnerability of our networks and third party service providers to security risks, including cyber-attacks; failure to properly identify or implement our strategies; regulatory constraints; constraints imposed by our level of indebtedness, risks of litigation or other proceedings; dependence on adequate numbers of customers; failure to develop, market or gain acceptance of new products; failure to close and effectively integrate acquisitions to achieve planned economics, including AST Canada, or divest underperforming businesses; currency risk; adverse effect of new business activities; adverse effects from business divestitures; not being able to meet cash requirements because of our holding company structure and restrictions on paying dividends; dependence on third-party suppliers and service providers; dependence of trading operations on a small number of clients; risks associated with our clearing operations; challenges related to international expansion; restrictions on ownership of TMX Group common shares; inability to protect our intellectual property; adverse effect of a systemic market event on certain of our businesses; risks associated with the credit of customers; cost structures being largely fixed; the failure to realize cost reductions in the amount or the time frame anticipated; dependence on market activity that cannot be controlled; the regulatory constraints that apply to the business of TMX Group and its regulated subsidiaries, costs of on exchange clearing and depository services, trading volumes (which could be higher or lower than estimated) and revenues; future levels of revenues being lower than expected or costs being higher than expected.

Forward-looking information is based on a number of assumptions which may prove to be incorrect, including, but not limited to, assumptions in connection with the ability of TMX Group to successfully compete against global and regional marketplaces; business and economic conditions generally;

exchange rates (including estimates of exchange rates from Canadian dollars to the U.S. dollar or GBP), commodities prices, the level of trading and activity on markets, and particularly the level of trading in TMX Group’s key products; business development and marketing and sales activity; the continued availability of financing on appropriate terms for future projects; changes to interest rates and the timing thereof, among other things, could positively or negatively impact AST Canada’s accretion to adjusted earnings per share; the amount and timing of incurrence of AST Canada integration costs; the amount and timing of: revenue and technology cost synergies resulting from the AST Canada acquisition; productivity at TMX Group, as well as that of TMX Group’s competitors; market competition; research and development activities; the successful introduction and client acceptance of new products; successful introduction of various technology assets and capabilities; the impact on TMX Group and its customers of various regulations; TMX Group’s ongoing relations with its employees; and the extent of any labour, equipment or other disruptions at any of its operations of any significance other than any planned maintenance or similar shutdowns.

In addition to the assumptions outlined above, forward looking information related to long term revenue cumulative average annual growth rate (CAGR) objectives, and long term adjusted earnings per share CAGR objectives are based on assumptions that include, but not limited to:

- TMX Group’s success in achieving growth initiatives and business objectives;
- Continued investment in growth businesses and in transformation initiatives including next generation post-trade systems;
- no significant changes to our effective tax rate, recurring revenue, and number of shares outstanding;
- moderate levels of market volatility;
- level of listings, trading, and clearing consistent with historical activity;
- economic growth consistent with historical activity;
- no significant changes in regulations;
- continued disciplined expense management across our business;
- continued re-prioritization of investment towards enterprise solutions and new capabilities;
- free cash flow generation consistent with historical run rate; and
- a limited impact from the COVID-19 pandemic on our plans to grow our business over the long term including on the ability of our listed issuers to raise capital.

While we anticipate that subsequent events and developments may cause our views to change, we have no intention to update this forward-looking information, except as required by applicable securities law. This forward-looking information should not be relied upon as representing our views as of any date subsequent to the date of this ESG report. We have attempted to identify important factors that could cause actual actions, events or results to differ materially from those current expectations described in forward-looking information. However, there may be other factors that cause actions, events or results not to be as anticipated, estimated or intended and that could cause actual actions, events or results to differ materially from current expectations. There can be no assurance that forward-looking information will prove to be accurate, as actual results and future events could differ materially from those anticipated in such statements. Accordingly, readers should not place undue reliance on forward-looking information. These factors are not intended to represent a complete list of the factors that could affect us. A description of the above- mentioned items is contained in the section **“Enterprise Risk Management”** of our 2021 Annual MD&A.



FOR MORE INFORMATION

PLEASE CONTACT INVESTOR RELATIONS IF YOU HAVE ANY ADDITIONAL QUESTIONS OR REQUIRE FURTHER CLARIFICATION.

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