



2012 SUSTAINABILITY REPORT

Effective December 1, 2012 | NASDAQ OMX | Corporate Sustainability

GLOBAL REPORTING INITIATIVE

GRI Application Level C, Guidelines G3.1
[GRI Content Index follows document]

Report Prepared By:

Evan Harvey
Managing Director
Corporate Sustainability
evan.harvey@nasdaqomx.com

LETTER FROM ROBERT GREIFELD, CEO



NASDAQ OMX has always been a believer in the virtues of sustainability. We were practicing *corporate sustainability* – in many different places and in many different ways – long before the term became so prevalent and fashionable. Efficiency and transparency formed the foundation of our brand 40 years ago, and they still drive our decision-making every day. This report identifies our key sustainability metrics, summarizes our accomplishments, and earmarks future opportunities for improvement.

NASDAQ OMX has, in the past year, transitioned many of our facilities towards more rigorous space, material, water, and energy usage standards. Several U.S. locations have achieved LEED certifications or met other environmental standards. Our Helsinki office was the first exchange to receive a WWF Green Office diploma. We published our first sustainability report, added a sustainability disclosure to our proxy statement, and will add a more detailed one to our 2012 annual report. In addition, we have committed to the Global Reporting Initiative and the United Nations Global Compact, and will improve the data already sent to the Carbon Disclosure Project.

We have been working through the World Federation of Exchanges to understand the need for sustainability reporting and collaborate with other stock markets and exchanges to make this part of our regular business practice. NASDAQ OMX regularly assists our listed companies in various ways, helping them better handle this aspect of their own operation. Last but not least, we have forged partnerships in the last year with several partners—advocacy groups, NGOs, economists—to better understand the interplay of sustainability metrics and market dynamics.

As this summary makes clear, we continually strive to match great ideas with peerless execution. Because we believe in the foundational principles of integrity, trust, and responsibility, we provide a work environment that rewards innovation, inclusiveness, and ethical behavior. We acknowledge the scarcity of limited resources by managing everything we use in a responsible and thoughtful manner. We accept our role as thought leaders, leveraging our foundations and other channels to educate investors, market professionals, and the general public about responsible investment strategy and sustainable capital formation.

NASDAQ OMX has an essential role to play in the continuing evolution and acceptance of corporate sustainability. Exchanges are uniquely positioned to promote greater adoption of realistic, material, and actionable business practices. Thus we are pleased to discuss our progress in this and future reports, and we welcome your feedback on our efforts.

Sincerely,

A handwritten signature in black ink that reads "Robert Greifeld". The signature is written in a cursive, flowing style.

Robert Greifeld
Chief Executive Officer
The NASDAQ OMX Group, Inc.

TABLE OF CONTENTS

LETTER FROM ROBERT GREIFELD, CEO	2
<hr/>	
INTRODUCTION	4
<hr/>	
ETHICS	5
ENVIRONMENT	6
ENTERPRISE	7
GREEN INDEXES	8
ORGANIZATIONAL PROFILE	9
<hr/>	
DOMESTIC SUBSIDIARIES	10
FOREIGN SUBSIDIARIES	11
REPORT PARAMETERS	15
GOVERNANCE, COMMITMENTS, AND ENGAGEMENT	17
PERFORMANCE INDICATORS	19
<hr/>	
ECONOMIC	19
ENVIRONMENTAL	23
SOCIAL	24
LABOR PRACTICES AND WORK	24
HUMAN RIGHTS	26
SOCIETY	26
PRODUCT RESPONSIBILITY	27
APPENDIX 1: GRI CONTENT INDEX	28
APPENDIX 2: GRI APPLICATION LEVEL TABLE	31
DISCLAIMER	32

INTRODUCTION

As the world's first electronic exchange, NASDAQ OMX was a pioneer in the sustainability space. Leveraging technology to produce a more efficient market reduced the resource burden, with untold benefits for the earth and its people. Our listed companies have a long and rich tradition of innovation, sustainability, and dedication to environmental causes.

The term "sustainability" refers to an organizational effort across multiple areas of expertise, including ethics, governance, resource management, real estate, materials, supply chain, education, philanthropy, and so on. Other terms used interchangeably are CSR (Corporate Social Responsibility) and ESG (Environment, Social, and Governance).

NASDAQ OMX is proud of its recent corporate sustainability accomplishments, including:

- + Submission of our first comprehensive Global Reporting Initiative (GRI) report
- + Improved reporting to the Carbon Disclosure Project (CDP)
- + Acceptance into the United Nations Global Compact
- + As part of the Sustainable Stock Exchange Initiative, NASDAQ OMX entered into a historic agreement with other key exchanges to develop and promote sustainability standards
- + An increasing number of LEED and other environmental certifications for our global offices
- + Promoting sustainability consensus through the World Federation of Exchanges

NASDAQ OMX emphasizes three key parts of the sustainability mission: ethics, environment, and enterprise. These are also the core tenets of a "triple bottom line" approach to business: people, planet, and profits.

ETHICS	ENVIRONMENT	ENTERPRISE
NASDAQ OMX emphasizes the core values of integrity, trust, and responsibility in our brand, our products, and our people.	We acknowledge the scarcity of limited resources by managing everything we use in a responsible and thoughtful manner.	We educate investors, market professionals, and the general public about responsible investment strategy and sustainable capital formation.

This report provides more information about the continuing development of our sustainability program. But our key goals—to expose operational inefficiencies, provide future growth opportunities, and significantly reduce risk and exposure—remain steadfast.

ETHICS

NASDAQ OMX's mission can be realized only if we advance and adhere to the highest of ethical principles in all our day-to-day dealings. As a global organization with diverse self-regulatory responsibilities and a critical role on the world's economic stage, we have heightened reasons for insisting upon ethical conduct.

Our business, by its nature, depends upon the confidence we instill in investors and our regulators. It also depends upon employees and vendors who trust they will be treated fairly; shareholders who rely on the integrity of our operations; and listed companies and member firms who expect that our reputation will enhance their own.

All NASDAQ OMX employees follow a rigorous Code of Ethics, which articulates our dedication and commitment to highest ethical conduct in all of our dealings. Employees are required to "certify" the Code of Ethics and follow a number of local rules and requirements, depending on their region, legal company of employment, and position within the organization. We all share an obligation to report Code violations or other behavior that may be illegal, inappropriate, or unethical.

The NASDAQ OMX Global Ethics Code reflects and reinforces our unqualified commitment to promoting ethical conduct. This Code, and associated corporate policies, requires all NASDAQ OMX employees to:

- + Act openly, honestly and fairly with employees, customers, clients, vendors, suppliers, shareholders and the communities in which we live and work.
- + Use corporate assets wisely, avoid conflicts of interest, protect sensitive information, and comply with laws governing products and international trade.
- + Avoid even the appearance of impropriety; set an example by taking the high road; make others proud to be affiliated with us.
- + Take particular care with personal trading activity to ensure it is consistent with all policies, local laws, and the spirit of our Code.

ETHICS POLICY COMPONENTS

NASDAQ OMX Code of Ethics

Global Trading Policy

Trading Policy for Officers and Directors

International Business Conduct Policy

Public Disclosure Policy

Anti-Trust and Unfair Trade Practices Policy

Internet/Social Media Policy

Policy on Responsibilities of a Self-Regulatory Organization

ENVIRONMENT

NASDAQ OMX strives to make sustainability a part of its corporate structure and way of life. Over the years, through employee initiatives, we have implemented office recycling programs, changed our paper supply to recycled paper and participated in corporate questionnaires such as the Carbon Disclosure Project (CDP).

Our headquarters at One Liberty Plaza (OLP), NASDAQ MarketSite, and our San Francisco offices are in LEED certified buildings. The new Rockville office will soon be the first LEED certified office location in our property portfolio. With this process in mind, we have standardized our construction and facilities practices to achieve a green element and reduce costs. Examples include: Office furniture that can be recycled and remodeled, the use of open office concepts for natural lighting, motion sensor and programmed lighting, and low-to-no VOC paints. NASDAQ OMX also subscribes to renewable energy by purchasing electricity from outside vendors such as wind turbine farms.

In the last several years there have been many efforts across the organization to reduce waste and improve the efficiency of our office environments, including:

- + New offices and remodels are being done to LEED specifications.
- + NASDAQ OMX Helsinki received a Green Office diploma from the WWF. In addition to meeting rigorous efficiency standards, the annual cost of this program helps the WWF protect wildlife.
- + NASDAQ OMX Helsinki went carbon neutral in 2012, only the third exchange in the world to do so. The exchange has also been member of FIBS (Finnish Business and Society) since 2011, which is a leading Corporate Responsibility Network in Finland.
- + We are reconfiguring the OLP space using the existing Herman Miller Ethospace system. This flexible system allows us to reorganize the space at a fraction of the cost, compared to purchasing a new furniture system.
- + Recycling programs are in place in many locations via office or building wide programs.
- + NASDAQ OMX will soon reconfigure its iconic MarketSite Tower in Times Square in to consume power more efficiently and further decrease our carbon footprint.

An Environment Committee was formed in Rockville to monitor and improve the environmental efficiency of the workplace. This committee aims to help employees make smart, environmentally sound decisions both in and out of the workplace. Committee members are dedicated to the efficient use of resources and to the improvement of physical space. This employee intervention model is being considered at other NASDAQ OMX office locations.

NASDAQ OMX owns and operates NASDAQ OMX Commodities which offers power, natural gas and carbon emission markets and clearing services for commodity markets globally.

ENTERPRISE

We educate investors, market professionals, and the general public about responsible investment strategy and sustainable capital formation. We leverage the power of our organization—through advocacy, oversight, and philanthropy—to support those who join us in this effort.

- + The NASDAQ OMX Educational Foundation fosters collaboration and initiatives for innovative educational programs and charitable activities. For example, The Edward Lowe Foundation received a \$730,000 grant from The NASDAQ OMX Educational Foundation to establish a new research and education institute focusing on job growth and capital access for developing companies in the United States.
- + The NASDAQ OMX Nordic Foundation supports scientific research that enhances the prosperity of financial markets in Finland and Sweden, as well as other markets.
- + Recognizing the growing demand for high school-level business education programs that are rigorous, relevant, and can be applied in the real world, Junior Achievement New York and the NASDAQ OMX Educational Foundation once again partnered up on a Business Plan Competition to seed NYC and Long Island students' interest in entrepreneurship as a pathway to economic and social empowerment.
- + The Education Foundation has supported relief efforts in Australia and Japan with charitable contributions to the Queensland Australia Disaster Relief Fund and the Japan Society Earthquake Relief Fund. NASDAQ OMX employees were also encouraged to support the relief assistance efforts through individual donations to charities of their choice.
- + NASDAQ OMX was the Signature Partner of Take Aim, a new program in cooperation with the Prostate Cancer Foundation (PCF). Take Aim was created to protect men and families around the world by raising awareness of this disease and supporting crucial research for a cure. NASDAQ OMX leads by example in the fight against prostate cancer: More than 80% of employees completed a comprehensive wellness exam, which includes a prostate cancer screening.
- + NASDAQ OMX's philanthropic endeavors are driven by our associates' commitment to being involved in their communities. Each year, NASDAQ OMX full and part-time employees are given two Corporate Volunteer Days. Not only can these events provide opportunities for individual employee personal growth and skill development, but also can improve the communities in which we live.
- + NASDAQ OMX Bell Ceremonies at MarketSite provide visibility and support for charitable and philanthropic organizations, such as the Global Autism Project. NASDAQ OMX also sponsors nonprofit events at MarketSite, including the recent Women in Housing and Finance 30th Anniversary celebration.

2011 CORPORATE CONTRIBUTIONS

CA League of Conservation Voters
 City Year Silicon Valley
 Dana-Farber Cancer Institute
 Epilepsy Foundation of Texas
 Hinsdale Junior Women's Club
 Invest in Others
 Texas A&M University
 Jewish Community Relations Council
 Minority Corporate Counsel
 Muscular Dystrophy Association
 Miracle Corners of the World
 National Multiple Sclerosis Society
 Skadden Fellowship Foundation
 St. Jude's Childrens Hospital
 St. Baldrick's Foundation
 The Bowery Mission
 Tuesday's Children
 UNICEF
 Women's Venture Fund

2011 VOLUNTEERISM

Making Strides against Breast Cancer
 Run for Central Park Conservancy
 Wall Street Run & Heart Walk
 Fresh Air Fund Clean Up Day
 Mississippi Gulf Clean-Up Effort

GREEN INDEXES

NASDAQ OMX was the first indexer to offer a complete family of indexes tracking the growing environmental and clean-energy sector, also known as Green Economy. The Green Economy illustrates a shift of economic development towards sustainable practices in business and infrastructure, including:

- + More efficient and cleaner energy production
- + Clean transportation
- + Better water usage and management
- + Greener buildings
- + Clean and efficient waste management
- + Improved land usage through sustainable farming and forestry

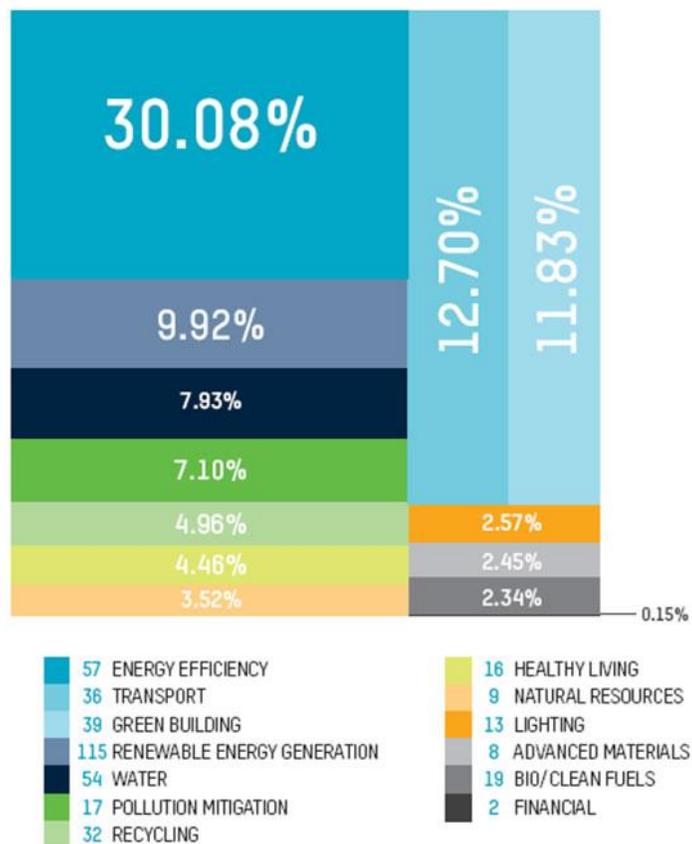
The ability to benchmark green and sustainable companies in a clear and comprehensive manner provides investors the opportunity to participate in the future growth of this critical sector.

+ The NASDAQ OMX Green Economy Global Benchmark Index is the first of its kind to monitor and track such a large portfolio of Green companies. It is designed to act as an indicator of performance of stocks in areas such as energy efficiency, renewable energy generation, pollution mitigation and advanced materials, providing a global benchmark for institutional and retail investors (illustration shows detailed sector weights).

+ The NASDAQ OMX CRD Global Sustainability Index is an equally weighted equity index that serves as a benchmark for stocks of companies that are taking a leadership role in sustainability performance reporting and are traded on a major US stock exchange. The Index is made up of companies that have taken a leadership role in disclosing their carbon footprint, energy usage, water consumption, hazardous and non-hazardous waste, employee safety, workforce diversity, management composition and community investing.

+ The Carbon Index Series is currently comprised of European Union Allowances (EUA) and Certified Emission Reduction (CER) futures contracts traded at the European Climate Exchange (ECX), the European Energy Exchange (EEX) and Nord Pool.

GREEN ECONOMY INDEX: SECTOR WEIGHTS / COMPANIES



Note: The information below has been prepared in accordance with the Global Reporting Initiative (GRI) Guidelines 3.1, Application Level C. It has been carefully composed and presented in this format to satisfy the requirements of the GRI reporting protocol. For more information, please see the GRI Content Index and the GRI Application Level Table, both presented as appendices to this report.

ORGANIZATIONAL PROFILE

Name of the organization. [GRI 2.1]

- + The NASDAQ OMX Group, Inc.

Primary brands, products and/or services. [GRI 2.2]

- + Central Securities Depositories (own and operate; no outsourcing)
- + NASDAQ OMX Corporate Solutions (own; no outsourcing)
- + The NASDAQ Stock Market (own and operate; no outsourcing)
- + NASDAQ Options Market (own and operate; no outsourcing)
- + NASDAQ OMX BX (own and operate; no outsourcing)
- + NASDAQ OMX Futures Exchange (own and operate; no outsourcing)
- + NASDAQ OMX PHLX (own and operate; no outsourcing)
- + NASDAQ OMX PSX (own and operate; no outsourcing)
- + First North – 7 markets (Copenhagen, Helsinki, Iceland, Riga, Stockholm, Tallinn, Vilnius) (own and operate; no outsourcing)
- + NASDAQ OMX Armenia (own and operate; no outsourcing)
- + NASDAQ OMX Commodities/Nord Pool (own and operate; no outsourcing)
- + NASDAQ OMX Copenhagen (own and operate; no outsourcing)
- + NASDAQ OMX Helsinki (own and operate; no outsourcing)
- + NASDAQ OMX Iceland (own and operate; no outsourcing)
- + NASDAQ OMX Nordic Derivatives Markets (own and operate; no outsourcing)
- + NASDAQ OMX Riga (own and operate; no outsourcing)
- + NASDAQ OMX Stockholm (own and operate; no outsourcing)
- + NASDAQ OMX Tallinn (own and operate; no outsourcing)
- + NASDAQ OMX Vilnius (own and operate; no outsourcing)
- + N2EX/UK (own and operate; no outsourcing)
- + IDCG central counterparty (CCP) clearing of OTC Interest Rate Derivatives (own and operate; no outsourcing)
- + NASDAQ OMX Commodities Clearing Corp (own and operate; no outsourcing)
- + NASDAQ OMX Stockholm (own and operate; no outsourcing)

NOTES:

NASDAQ OMX is a global exchange group that delivers trading, clearing, exchange technology, regulatory, securities listing, and public company services across six continents. Our global offerings are diverse and include trading and clearing across multiple asset classes, market data products, financial indexes, capital formation solutions, financial services and market technology products and services. Our technology powers markets across the globe, supporting cash equity trading, derivatives trading, clearing and settlement, and many other functions.

In the U.S., we operate The NASDAQ Stock Market, a registered national securities exchange. The NASDAQ Stock Market is the largest single cash equities securities market in the U.S. in terms of listed companies and in the world in terms of share value traded. As of December 31, 2011, The NASDAQ Stock Market was home to 2,680 listed companies with a combined market capitalization of approximately \$4.4 trillion. In addition, in the U.S. we operate two additional cash equities trading markets, two options markets, a futures market and a derivatives clearinghouse. We also engage in riskless principal trading of over-the-counter, or OTC, power and gas contracts.

In Europe, we operate exchanges in Stockholm (Sweden), Copenhagen (Denmark), Helsinki (Finland), and Iceland as NASDAQ OMX Nordic, and exchanges in Tallinn (Estonia), Riga (Latvia) and Vilnius (Lithuania) as NASDAQ OMX Baltic. Collectively, the exchanges that comprise NASDAQ OMX Nordic and NASDAQ OMX Baltic offer trading in cash equities, bonds, structured products and ETFs, as well as trading and clearing of derivatives and clearing of resale and repurchase agreements. Through NASDAQ OMX First North, our Nordic and Baltic operations also offer alternative marketplaces for smaller companies. As of December 31, 2011, the exchanges that comprise NASDAQ OMX Nordic and NASDAQ OMX Baltic, together with NASDAQ OMX First North, were home to 776 listed companies with a combined market capitalization of approximately \$0.9 trillion. We also operate NASDAQ OMX Armenia.

In addition, NASDAQ OMX Commodities operates the world's largest power derivatives exchange, one of Europe's largest carbon exchanges, and (together with Nord Pool Spot) N2EX, a marketplace for physical U.K. power contracts. In some of the countries where we operate exchanges, we also provide clearing, settlement and depository services.

Operational structure of the organization, including main divisions, operating companies, subsidiaries and joint ventures. [GRI 2.3]

DOMESTIC SUBSIDIARIES

- + Boston Stock Exchange Clearing Corporation (incorporated in Massachusetts)
- + Directors Desk, LLC (organized in Delaware)
- + EA LLC (organized in Delaware)
- + Exchange Access LLC (organized in Delaware)
- + Execution Access, LLC (organized in Delaware)
- + FINRA/NASDAQ Trade Reporting Facility LLC (organized in Delaware)
- + FTEN FinTech LLC (organized in Delaware)
- + FTEN, Inc. (incorporated in Delaware)
- + GlobeNewswire, Inc. (incorporated in California)
- + Nasdaq Execution Services, LLC (organized in Delaware)
- + NASDAQ Global, Inc. (incorporated in Delaware)
- + Nasdaq International Market Initiatives, Inc. (incorporated in Delaware)
- + NASDAQ OMX BX Equities LLC (organized in Delaware)
- + NASDAQ OMX BX, Inc. (incorporated in Delaware)
- + NASDAQ OMX Commodities Clearing Company (organized in Delaware)
- + NASDAQ OMX Commodities Clearing LLC (organized in Delaware)
- + NASDAQ OMX Corporate Solutions, Inc. (incorporated in Delaware)
- + NASDAQ OMX Event Technologies LLC (organized in Delaware)
- + NASDAQ OMX Futures Exchange, Inc. (incorporated in Pennsylvania)
- + NASDAQ OMX Information, LLC (organized in Delaware)

- + NASDAQ OMX PHLX LLC (organized in Delaware)
- + NASDAQ OMX (San Francisco) Insurance LLC (organized in Delaware)
- + NASDAQ Options Services, LLC (organized in Delaware)
- + Nasdaq Technology Services, LLC (organized in Delaware)
- + Norway Acquisition LLC (organized in Delaware)
- + OM Technology (US) Inc. (incorporated in Delaware)
- + OMX (US) Inc. (incorporated in Delaware)
- + SMARTS Group, Inc. (organized in Delaware)
- + The NASDAQ OMX Group Educational Foundation, Inc. (incorporated in Delaware) (non-profit)
- + The NASDAQ Options Market LLC (organized in Delaware)
- + The NASDAQ Stock Market LLC (organized in Delaware)
- + The Stock Clearing Corporation of Philadelphia (incorporated in Pennsylvania)
- + FinQcloud LLC (organized in Delaware)
- + INET Futures Exchange LLC (organized in Delaware)

FOREIGN SUBSIDIARIES*

- + AB NASDAQ OMX Vilnius (organized in Lithuania)
- + AS eCSD Expert (organized in Estonia)
- + AS Eesti Väärtpaberikeskus (organized in Estonia)
- + AS Latvijas Centralais depozitarijs (organized in Latvia)
- + AS OMX Registrikeskus (organized in Estonia)
- + “Central Depository of Armenia” Open Joint Stock Company (organized in Armenia)
- + Clearing Control CC AB (organized in Sweden)
- + Eignarhaldsfelagid Verdbrefathing hf. (organized in Iceland)
- + Findata AB (organized in Sweden)
- + FTEN Europe Ltd (organized in the United Kingdom)
- + Glide Technologies Ltd (organized in the United Kingdom)
- + Lithuanian Central Securities Depository (organized in Lithuania)
- + Mamato Motion AB (organized in Sweden)
- + Nasdaq Canada Inc. (organized in Canada)
- + Nasdaq International Ltd (organized in the United Kingdom)
- + “NASDAQ OMX Armenia” Open Joint Stock Company (organized in Armenia)
- + NASDAQ OMX Australia Holding Pty Ltd (organized in Australia)
- + NASDAQ OMX Broker Services AB (organized in Sweden)
- + NASDAQ OMX Copenhagen A/S (organized in Denmark)
- + NASDAQ OMX Derivatives A/S (organized in Denmark)
- + NASDAQ OMX Europe Ltd (organized in the United Kingdom)
- + NASDAQ OMX Helsinki Ltd (organized in Finland)
- + NASDAQ OMX Holding AB (organized in Sweden)
- + NASDAQ OMX Holding Danmark A/S (organized in Denmark)
- + NASDAQ OMX Holding Luxembourg Sàrl (organized in Luxembourg)
- + NASDAQ OMX Iceland hf. (organized in Iceland)
- + NASDAQ OMX NLX Ltd (organized in the United Kingdom)
- + NASDAQ OMX Nordic Ltd (organized in Finland)
- + NASDAQ OMX Oslo ASA (organized in Norway)
- + NASDAQ OMX Riga, AS (organized in Latvia)
- + NASDAQ OMX Stockholm AB (organized in Sweden)
- + NASDAQ OMX Tallinn AS (organized in Estonia)
- + NASDAQ OMX Technology Support AB (organized in Sweden)

- + Nord Pool AB (organized in Sweden)
- + OMX AB (organized in Sweden)
- + OMX Capital Insurance AG (organized in Switzerland)
- + OMX Ltd (organized in China)
- + OMX Netherlands BV (organized in the Netherlands)
- + OMX Netherlands Holding BV (organized in the Netherlands)
- + OMX Pte Ltd (organized in Singapore)
- + OMX Pty Ltd (organized in Australia)
- + OMX Technology AB (organized in Sweden)
- + OMX Technology Canada Inc. (organized in Canada)
- + OMX Technology Energy Systems AS (organized in Norway)
- + OMX Technology (Ireland) Ltd (organized in Ireland)
- + OMX Technology Italy Srl (organized in Italy)
- + OMX Technology Japan Ltd (organized in Japan)
- + OMX Technology Ltd (organized in the United Kingdom)
- + OMX Technology (UK) Ltd (organized in the United Kingdom)
- + OMX Treasury AB (organized in Sweden)
- + OMX Treasury Euro AB (organized in Sweden)
- + OMX Treasury Euro Holding AB (organized in Sweden)
- + Quietus Advice K & W nr 505 AB (organized in Sweden)
- + Shareholder.com B.V. (organized in the Netherlands)
- + SMARTS (Asia) Ltd (organized in China)
- + SMARTS Broker Compliance Pty Ltd (organized in Australia)
- + SMARTS Group Europe Ltd (organized in U.K.)
- + SMARTS Group Holdings Pty Ltd (organized in Australia)
- + SMARTS Market Surveillance Pty Ltd (organized in Australia)
- + Stockholms Fondbörs AB (organized in Sweden)
- + Verdbrefaskraning Islands hf. (organized in Iceland)
- + Zoom Vision Mamato AB (organized in Sweden)
- + Zoom Vision Mamato ApS (organized in Denmark)
- + BWISE Beheer B.V. (organized in Netherlands)
- + BWISE Holding B.V. (organized in Netherlands)
- + BWISE B.V. (organized in Netherlands)
- + BWISE Development B.V. (organized in Netherlands)
- + BWISE UK Ltd. (organized in United Kingdom)
- + BWISE Germany GmbH (organized in Germany)
- + BWISE Internal Control Inc. (organized in Delaware)
- + NOS Clearing ASA (organized in Norway)
- + EMCF N.V. (Netherlands 20%)

** This list of subsidiaries does not include foreign branches of particular subsidiaries.*

NOTES:

Nasdaq was founded in 1971 as a wholly-owned subsidiary of FINRA (then known as the National Association of Securities Dealers, Inc.). Beginning in 2000, FINRA restructured and broadened ownership in Nasdaq by selling shares to FINRA members, investment companies and issuers listed on The NASDAQ Stock Market.

In connection with this restructuring, Nasdaq applied to the SEC to register The NASDAQ Stock Market as a national securities exchange. FINRA fully divested its ownership of Nasdaq in 2006, and The NASDAQ Stock Market became fully operational as an independent registered national securities exchange in 2007. In 2006,

Nasdaq also reorganized its operations into a holding company structure. As a result, our exchange licenses and exchange and broker-dealer operations are held by our subsidiaries.

On February 27, 2008, Nasdaq and OMX AB combined their businesses pursuant to an agreement with Borse Dubai Limited, a Dubai company, or Borse Dubai, and Nasdaq was renamed The NASDAQ OMX Group, Inc. This transformational combination resulted in the expansion of our business from a U.S.-based exchange operator to a global exchange company offering technology that powers more than 70 exchanges, clearing organizations and central securities depositories in more than 50 countries.

Our Genium INET technology platforms, based on proven INET technology that we originally acquired in the acquisition of INET ECN in 2005, provides technology to customers with the speed, scale and reliability required to meet the specific needs of their markets.

Also in 2008, we expanded our U.S. Market Services business through the acquisitions of the Philadelphia Stock Exchange, Inc., or PHLX, and the Boston Stock Exchange, Incorporated, or BSX. The acquisition of PHLX, renamed NASDAQ OMX PHLX LLC, expanded our presence in the derivatives markets, and we currently operate two separate options markets, NASDAQ OMX PHLX and The NASDAQ Options Market. We used the BSX license to create a second U.S. cash equities market, called NASDAQ OMX BX, which was launched in January 2009 and in 2010, we launched a third U.S. cash equities market utilizing the PHLX license called NASDAQ OMX PSX. Most recently, we expanded our Market Services offerings with the acquisition in 2010 of FTEN, Inc., or FTEN, a leading provider of Real-Time Risk Management, or RTRM, solutions for the financial securities market.

We also have expanded into the business of trading and clearing commodities products in recent years. In 2008, we acquired the clearing, international derivatives and consulting subsidiaries of Nord Pool ASA, or Nord Pool. As a result of this acquisition, we launched NASDAQ OMX Commodities, which offers energy and carbon derivatives products. In 2010, we acquired a derivatives trading market through the purchase of the remaining businesses of Nord Pool. Also in 2010, through our subsidiary NASDAQ OMX Commodities Clearing Company, or NOCC, we purchased the assets of North American Energy Credit and Clearing Corp., expanding our presence in the OTC energy commodity markets. Together with Nord Pool Spot, NASDAQ OMX Commodities also launched N2EX, a marketplace for physical U.K. power contracts, in 2010.

In August 2010, we acquired SMARTS Group Holdings Pty Ltd, or SMARTS, a leading technology provider of surveillance solutions to exchanges, regulators and brokers. This acquisition allowed our Market Technology business to enter the surveillance and compliance market. In recent years, we have expanded our Corporate Solutions business within our Issuer Services segment, which provides customer support services

Location of the organization's headquarters. [GRI 2.4]

- + One Liberty Plaza, 165 Broadway, New York, NY USA 10006
- + Telephone: +1 212 401 8700

Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to sustainability issues covered in the report. [GRI 2.5]

NASDAQ OMX has major operations in the 18 different countries listed below. All of these countries are involved to some extent in our corporate sustainability effort. NASDAQ OMX Helsinki in Finland is a particular leader in terms of energy and resource management.

- + United States
- + Denmark

- + Finland
- + England
- + Norway
- + Italy
- + Iceland
- + Latvia
- + Sweden
- + Estonia
- + Lithuania
- + China
- + Hong Kong
- + Singapore
- + Australia
- + Japan
- + Armenia
- + United Arab Emirates

Nature of ownership and legal form. [GRI 2.6]

- + The NASDAQ OMX Group, Inc. is a publicly owned Delaware USA corporation. All subsidiaries are corporations, limited liability companies, or limited companies.

Markets served (including geographic breakdown, sectors served and types of customers/beneficiaries). [GRI 2.7]

- + NASDAQ OMX Group owns and operates 24 markets, 3 clearing houses, and 5 central securities depositories, spanning six continents—making NASDAQ OMX the world’s largest exchange company. Eighteen of the 24 NASDAQ OMX markets trade equities. The other six trade options, derivatives, fixed income, and commodities. Additionally, NASDAQ OMX offers financial services related to the intelligence, governance, visibility and communications needs of NASDAQ OMX listed companies and clients.

Scale of the reporting organization. [GRI 2.8]

As of December 31, 2011:

- + 2,443 employees
- + Net Revenues: \$1,690,000,000 (USD)
- + Total capitalization: \$4,025,000,000 (USD)

Significant changes during the reporting period regarding size, structure, or ownership. [GRI 2.9]

- + There were no significant changes during the reporting period (2011) regarding size, structure, or ownership.

Awards received in the reporting period. [GRI 2.10]

- + Although NASDAQ OMX won several awards in 2010 and 2012, it did not receive any in 2011.

REPORT PARAMETERS

Reporting period (e.g., fiscal/calendar year) for information provided. [GRI 3.1]

- + The Reporting Period for the information provided herein is the 2011 calendar year (January 1, 2011 through December 31, 2011).

Date of most recent previous report (if any). [GRI 3.2]

- + This is the first GRI sustainability report written, submitted, or published directly by NASDAQ OMX. Previous reports—published on the corporate website or in standard financial disclosures (such as the proxy statement)—were not as comprehensive and did not follow the GRI reporting standard.

Reporting cycle (annual, biennial, etc.) [GRI 3.3]

- + This report will be published annually.

Contact point for questions regarding the report or its contents. [GRI 3.4]

Evan Harvey
 Managing Director, Corporate Sustainability
 The NASDAQ OMX Group, Inc.
 805 King Farm Boulevard
 Rockville, MD USA 20850
 evan.harvey@nasdaqomx.com
 +1 301-978-5041

Process for defining report content. [GRI 3.5]

- + This report involved the participation of several key NASDAQ OMX organizational divisions, as well as the direct participation of more than 30 employees, contractors, and consultants. The scope, depth, and materiality of the information presented herein was determined by:
 - Previous public disclosures
 - Industry standards
 - Guidance from NGOs
 - Guidance from investor groups
 - Guidance from the Global Reporting Initiative

Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance. [GRI 3.6]

- + This report covers all business areas where NASDAQ OMX holds significant control or influence. All of our global financial services activities are addressed. There were no purposeful boundaries put in place.

State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope). [GRI 3.7]

- + There are only two known limitations to the scope or boundary of this report:
 - A lack of available data
 - The protection of proprietary business interests

Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations. [GRI 3.8]

- + All joint ventures, divisions, and subsidiaries are included in the report. Leased facilities and suppliers were generally excluded (unless otherwise specified).

Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods). [GRI 3.10]

- + This is our first GRI report, thus there are no restatements of information from previous reporting periods in the scope, boundary, or measurement methods applied.

Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report. [GRI 3.11]

- + This is our first GRI report, thus there are no significant changes from previous reporting periods in the scope, boundary, or measurement methods applied.

Table identifying the location of the Standard Disclosures in the report. [GRI 3.12]

- + An index of NASDAQ OMX disclosures and indicators is included as an appendix to this report.

GOVERNANCE, COMMITMENTS, AND ENGAGEMENT

Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight. [GRI 4.1]

+ *Shareholders*

- Current list available at our Investor Relations website (<http://ir.nasdaqomx.com>)

+ *Board of Directors*

- Steven D. Black
- Börje Ekholm
- Bob Greifeld
- Glenn H. Hutchins
- Essa Kazim
- John D. Markese
- Ellyn A. McColgan
- Thomas F. O'Neill
- James S. Riepe
- Michael R. Splinter
- Lars Wedenborn

+ *Committees*

- Audit
- Executive
- Finance
- Nominating & Governance
- Management Compensation

+ *Executive Officers*

- Robert Greifeld
- Lee Shavel
- Bruce E. Aust
- Anna Ewing
- John L. Jacobs
- Hans-Ole Jochumsen
- Eric W. Noll
- Edward S. Knight

Indicate whether the Chair of the highest governance body is also an executive officer. [GRI 4.2]

- + The highest chair (Interim Chairman Borje Ekholm) of the highest governance body (board of directors) is not an executive officer.

For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members. [GRI 4.3]

- + NASDAQ OMX has a unitary board structure. Eight (8) out of 11 members of the highest governance body (board of directors) are independent; only one (Bob Greifeld) is an executive member.

Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body. [GRI 4.4]

- + The mechanism for a shareholder to provide recommendations or direction to the highest governance body (board of directors), according to the NASDAQ OMX by-laws, requires adding them to the company proxy statement ahead of the annual shareholders meeting.
 - o According to Article III Sec. 3.1, for nominations or other business, employees and shareholders must have given “timely notice thereof in writing to the Secretary of the Corporation and any such proposed business other than the nominations of persons for election to the Board must constitute a proper matter for stockholder action.”

List of stakeholder groups engaged by the organization. [GRI 4.14]

- + Civil society
- + Customers
- + Regulators
- + Employees and contractors
- + Local communities
- + Shareholders and providers of capital
- + Suppliers

Basis for identification and selection of stakeholders with whom to engage. [GRI 4.15]

- + The engagement of NASDAQ OMX is far-reaching as the largest exchange company and direct or targeted engagement is towards employees, shareholders, vendors and other customers. The materiality regarding NASDAQ OMX helps define the stakeholder group relevant to NASDAQ OMX. NASDAQ OMX works together with other organizations that share the same fundamental operating issues and align with NASDAQ OMX corporate philosophy of transparency, integrity and efficacy.

PERFORMANCE INDICATORS

ECONOMIC

Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments. [GRI EC1]

COMPONENT	COMMENT	2011 AMOUNT (USD)
<i>Direct Economic Value Generated</i>		
Revenues (a)	United States	\$2,707,000,000
	All other countries	\$731,000,000
Cost of revenues	Transaction rebates	(\$1,344,000,000)
	Brokerage, clearance, and exchange fees	(\$404,000,000)
	Total	\$1,690,000,000
<i>Economic Value Distributed</i>		
Operating Costs (b)	Marketing and advertising	\$24,000,000
	Depreciation and amortization	\$109,000,000
	Professional and contract services	\$90,000,000
	Computer operations, data communications	\$65,000,000
	Occupancy	\$91,000,000
	Regulatory	\$35,000,000
	Merger and Strategic Initiatives	\$38,000,000
	General, administrative, other costs	\$84,000,000
Employee Wages & Benefits (c)	Compensation and benefits	\$458,000,000
Payments to Providers of Capital (d)	Dividends paid	\$0
	Interest expense	\$119,000,000
	Asset impairment charge	\$18,000,000
Payments to Government (e)	Income tax provision	\$190,000,000
Community Investments (f)	Charitable giving	\$100,000
	Total	\$1,321,100,000
<i>Economic Value Retained</i>		
Economic Value Generated less Economic Value Distributed		\$368,900,000

Source: The NASDAQ OMX Group, Inc. Form 10-K (Filed on February 10, 2012)

Coverage of the organization's defined benefit obligations. [GRI EC3]

- + We maintain non-contributory, defined-benefit pension plans, non-qualified supplemental executive retirement plans, or SERPs, for certain senior executives and post-retirement benefit plans for eligible employees in the U.S., collectively referred to as the NASDAQ OMX Benefit Plans. Our pension plans and SERPs are frozen. Future service and salary for all participants do not count toward an accrual of benefits under the pension plans and SERPs.
- + NASDAQ OMX's Pension and 401(k) Committee, which is comprised of employees of NASDAQ OMX, has oversight responsibility for the plan assets of the NASDAQ OMX Benefit Plans. The investment policy and strategy of the plan assets, which was adopted by NASDAQ OMX's Pension and 401(k) Committee, is to provide for preservation of principal, both in nominal and real terms, in order to meet the long-term spending needs of the NASDAQ OMX Benefit Plans. We invest in securities per the target allocations stated below. Target allocations for plan assets as of December 31, 2011 were as follows:

Target	Allocation
Mutual Funds	75%
U.S. Equity Securities	10%
Other investment strategies and cash	15%

- + Securities are held in various classes of domestic, international and emerging market equity and fixed-income securities. Asset allocations are reviewed quarterly and adjusted, as appropriate, to remain within target allocations. The investment policy is reviewed on an annual basis, under the advisement of an investment consultant, to determine if the policy or asset allocation targets should be changed.
- + The expected rate of return on plan assets for the NASDAQ OMX Benefit Plans represents our long-term assessment of return expectations which may change based on significant shifts in economic and financial market conditions. The long-term rate of return on plan assets is derived from return assumptions determined based on asset classes held and weighted based on the current target allocation for each class. Over the long term, our investments in bond mutual funds are expected to return between 4% and 5%, investments in equity mutual funds and U.S. equity securities are expected to return between 7% and 9%, other investment strategies are expected to return between 7% and 8%, and cash is expected to return between 2% and 3%.
- + While we considered the NASDAQ OMX Benefit Plans recent performance and other economic growth and inflation factors, which are supported by long-term historical data, the return expectations for each of these asset categories represents a long-term prospective return. Based on historical experience, the NASDAQ OMX Pension and 401(k) Committee expects that the plans' asset managers overall will provide a modest (1% per annum) premium to their respective market benchmark indexes.

Non-U.S. Benefit Plans

Most employees outside the U.S. are covered by local retirement plans or by applicable social laws. Benefits under social laws are generally expensed in the periods in which the costs are incurred. These costs are included in compensation and benefits expense in the Consolidated Statements of Income and were \$14 million in 2011, \$13 million in 2010 and \$14 million in 2009.

As part of the acquisition of certain subsidiaries of Nord Pool, we assumed the obligation for several pension plans providing benefits for these employees. Employees covered under these pension plans are entitled to defined future pension benefits based on the number of years of employment and pay at retirement age. The measurement date of the plan obligations is December 31. The projected benefit obligation was \$15 million at December 31, 2011 and \$14 million at December 31, 2010. The fair value of the plan assets was \$7 million at December 31, 2011 and \$6 million at December 31, 2010. The underfunded status of the plans was \$8 million at both December 31, 2011 and 2010, and was included in other non-current liabilities in the Consolidated Balance Sheets. The benefit cost for these plans was \$2 million in 2011, \$1 million in 2010 and \$3 million in 2009.

U.S. Defined Contribution Savings Plan

We sponsor a voluntary defined contribution savings plan, or 401(k) Plan, for U.S. employees. Employees are immediately eligible to make contributions to the plan and are also eligible for an employer contribution match at an amount equal to 100.0% of the first 4.0% of eligible employee contributions. Savings plan expense included in compensation and benefits expense in the Consolidated Statements of Income was \$4 million in 2011, 2010 and 2009.

We have a profit-sharing contribution feature to our 401(k) plan which allows eligible U.S. employees to receive employer retirement contributions, or ERCs, when we meet our annual corporate goals. In addition, we have a supplemental ERC for select highly compensated employees whose ERCs are limited by the annual Internal Revenue Service compensation limit. ERC expense recorded in compensation and benefits expense in the Consolidated Statements of Income was \$5 million in 2011 and \$4 million in both 2010 and 2009.

Employee Stock Purchase Plan

We have an ESPP under which approximately 3.6 million shares of our common stock have been reserved for future issuance as of December 31, 2011.

Our ESPP allows eligible U.S. and non-U.S. employees to purchase a limited number of shares of our common stock at six-month intervals, called offering periods, at 85.0% of the lower of the fair market value on the first or the last day of each offering period. The 15.0% discount given to our employees is included in compensation and benefits expense in the Consolidated Statements of Income.

Under our ESPP, employees may purchase shares having a value not exceeding 10.0% of their annual compensation, subject to applicable annual Internal Revenue Service limitations. In 2011, employees used ESPP to purchase 246,850 shares at a weighted-average price of \$20.64; in 2010, employees purchased 242,865 shares at a weighted-average price of \$15.08; and in 2009, employees purchased 201,559 shares at a weighted-average price of \$17.68. We recorded compensation expense of \$1.2 million for the year ended December 31, 2011, \$0.8 million for the year ended December 31, 2010 and \$0.6 million for the year ended December 31, 2009 for the 15.0% discount that is given to our employees.

Share-Based Compensation

We have a share-based compensation program that provides our board of directors broad discretion in creating employee equity incentives. Share-based awards, or equity awards, include employee stock options, restricted stock (which includes awards and units), and PSUs. Grants of equity awards are designed to reward employees for their long-term contributions and provide incentives for them to remain with us. For accounting purposes, we consider PSUs to be a form of restricted stock.

Restricted stock is generally time-based and vests over three- to five-year periods beginning on the date of the grant. Stock options are also generally time-based and expire ten years from the grant date. Stock option and restricted stock awards generally include performance-based accelerated vesting features based on achievement of specific levels of corporate performance. If NASDAQ OMX exceeds the applicable performance

parameters, the grants vest on the third anniversary of the grant date, if NASDAQ OMX meets the applicable performance parameters, the grants vest on the fourth anniversary of the grant date, and if NASDAQ OMX does not meet the applicable performance parameters, the grants vest on the fifth anniversary of the grant date.

PSUs are based on performance measures that impact the amount of shares that each recipient will receive upon vesting. PSUs are granted at the fair market value of our stock on the grant date and compensation cost is recognized over the performance period and, in certain cases, an additional vesting period. For each grant of PSUs, an employee may receive from 0% to 150% of the target amount granted, depending on the achievement of performance measures. We report the target number of PSUs granted, unless we have determined that it is more likely than not, based on the actual achievement of performance measures, that an employee will receive a different amount of shares underlying the PSUs, in which case we report the amount of shares the employee is likely to receive.

ENVIRONMENTAL

Direct energy consumption by primary energy source. [GRI EN3]

REGION	COUNTRY	LOCATION	2011 KWH	2011 GJ
Americas	Canada	Calgary	8,140	29
Americas	USA	Ashburn	7,980,000	28,728
Americas	USA	Carteret	45,401,000	163,444
Americas	USA	Chicago	7,416	27
Americas	USA	Eugene	433	2
Americas	USA	Los Angeles	15,536	56
Americas	USA	Marlborough	81,933	295
Americas	USA	New York	5,682,000	20,455
Americas	USA	New York	1,622,123	5,840
Americas	USA	Philadelphia	4,487,644	16,156
Americas	USA	Rockville	815,558	2,936
Americas	USA	San Francisco	9,218	33
Americas	USA	Secaucus	3,232,000	11,635
Americas	USA	Shelton	291,000	1,048
Americas	USA	Washington	2,460	9
Asia	Armenia	Yerevan	103,446	372
Asia	China	Beijing	7,704	28
Asia	Hong Kong	Hong Kong	38,269	138
Asia	Japan	Tokyo	145,897	525
Asia	Singapore	Tung Centre	16,831	61
Australia	Australia	Sydney	386,134	1,390
Europe	Denmark	Copenhagen	405,830	1,461
Europe	Estonia	Tallinn	118,201	426
Europe	Finland	Helsinki	302,420	1,089
Europe	Iceland	Reykjavik	140,923	507
Europe	Italy	Milan	18,394	66
Europe	Latvia	Riga	102,938	371
Europe	Lithuania	Vilnius	50,226	181
Europe	Norway	Lysaker	246,363	887
Europe	Sweden	Lunda	7,884,000	28,382
Europe	Sweden	OMX Port	1,051,000	3,784
Europe	Sweden	Stockholm	6,012,105	21,644
Europe	UK	London	1,207,000	4,345
Total 2011 Consumption (in kilowatt-hours and gigajoules)			87,874,142	316,347

SOCIAL

LABOR PRACTICES AND DECENT WORK

Total workforce by employment type, employment contract, and region broken down by gender. [GRI LA1]

REGION	FT EMPLOYEES	NON-FT EMPLOYEES
North America	1,108	10
Latin America	0	0
Asia	198	3
EMEA	1,017	51
Total	2,323 (97%)	64 (3%)

AGE GROUP	MALE	FEMALE
< 29	177	122
30 - 49	1,146	562
> 50	254	126
Total	1,577 (66%)	810 (34%)

Benefits provided to full-time, permanent employees. [GRI LA3]

- + US Benefit Programs are afforded to FT employees working at least 35 hours per week and PT employees that work at least 20 hour per week. Temporary employees who meet the eligibility requirements for the 401(k) plan are enrolled in the plan. No other benefits are provided to temporary employees. Outside of the U.S., benefits are mainly government-provided, although this may vary from country to country.

Employees covered by collective bargaining agreements. [GRI LA4]

- + Approximately 4%

Minimum notice period(s) regarding significant operational changes. [GRI LA5]

- + Notice periods range from 1 month to 6 months.
- + Collective agreements exist in Denmark and Finland. Each agreement has its own rules.

Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. [GRI LA6]

- + NASDAQ OMX is primarily an office environment. Thus we have safety policies, but no formal management-worker health safety committees.

Rates of injury, occupational diseases, lost days, and absenteeism, and a number of work-related fatalities by region and by gender. [GRI LA7]

- + Incident Rate
 - North America: 53/1,118 (4.7%)
 - Latin America: None (0%)
 - EMEA: 127/1,068 (11.9%)
 - Asia: 3/201 (1.4%)

- + Lost-Time Incident Rate
 - North America: 2,704 days (53 employees)
 - Latin America: None (0 employees)
 - EMEA: 21,362 days (127 employees)
 - Asia: 1,016 days (3 employees)

- Total Lost-Time Days—Global
 - 25,082 days
 - 183 employees

- + Total Global Fatalities
 - None

- Occupational Diseases
 - None

Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases [GRI LA8]

- + NASDAQ OMX has a wellness policy, mission statement and initiatives that promote healthy behaviors globally.

Health and safety topics covered in formal agreements with trade unions [GRI LA9]

- + Collective agreements exist in Denmark and Finland. Each agreement has its own rules.

Average hours of training per year per employee by employee category (Total Hours) [GRI LA10]

- + We did not track this metric in 2011, but will do so in 2012.

Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings [GRI LA11]

- + We offer outplacement services for employees who are involuntarily terminated.

Percentage of employees receiving regular performance and career development reviews [GRI LA12]

- + 100%

HUMAN RIGHTS

Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken [GRI HR2]

- + None

Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained [GRI HR3]

- + None

Total number of incidents of discrimination and actions taken [GRI HR4]

- + We track this information internally, but do not publicly disclose it.

Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights [GRI HR5]

- + None

Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor [GRI HR7]

- + None

Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations. [GRI HR8]

- + 100%

SOCIETY

Percentage and total number of business units analyzed for risks related to corruption [GRI SO2]

- + 100%

Percentage of employees trained in organization's anti-corruption policies and procedures [GRI SO3]

- + NASDAQ OMX's anti-corruption policies and procedures are set forth in the company's Global Code of Ethics and Global International Business Conduct Policy. All employees receive copies of these policies when they commence employment, and the policies are available on the company's internal website. In addition, all employees are required to certify at the time of employment, and thereafter during an annual certification period, that they are in compliance.

Actions taken in response to incidents of corruption [GRI SO4]

- + There have been no known instances of corruption.

Public policy positions and participation in public policy development and lobbying [GRI SO5]

- + NASDAQ OMX employs a full staff of Government Relations professionals, Economists and Legal experts to address any given issue or public policy challenge anywhere in the world. We have a strong history of working on the issues that affect public companies, having fought alongside our companies on issues such as stock option accounting, SOX 404, H1B Visa Reform, lawsuit reform, taxes and many others.

Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country [GRI SO6]

- + NASDAQ OMX did not contribute corporate funds to political candidates in the jurisdictions in which we operated during this reporting period. U.S. employees may contribute to a political action committee (PAC), which makes contributions to federal election campaigns and other political action committees. The NASDAQ OMX PAC does not use corporate funds. The NASDAQ OMX PAC files regularly with the U.S. Federal Election Commission (FEC) and all contributions and disbursements are disclosed on the FEC website (www.fec.gov).

Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes [GRI SO7]

- + None

Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations [GRI SO8]

- + None

PRODUCT RESPONSIBILITY**Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes [GRI PR7]**

- + None

Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data [GRI PR8]

- + None

Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services [GRI PR9]

- + None

APPENDIX 1: GRI CONTENT INDEX

G3.1 CONTENT INDEX - GRI APPLICATION LEVEL C		
STANDARD DISCLOSURES: Profile Disclosures		
1. Strategy and Analysis		
<i>Disclosure</i>	<i>Reported</i>	<i>Location</i>
1.1	Yes	Pages 2-8
2. Organizational Profile		
2.1	Yes	Page 9
2.2	Yes	Page 9
2.3	Yes	Pages 10-13
2.4	Yes	Page 13
2.5	Yes	Page 13
2.6	Yes	Page 14
2.7	Yes	Page 14
2.8	Yes	Page 14
2.9	Yes	Page 14
2.10	Yes	Page 14
3. Report Parameters		
3.1	Yes	Page 15
3.2	Yes	Page 15
3.3	Yes	Page 15
3.4	Yes	Page 15
3.5	Yes	Page 15
3.6	Yes	Page 15
3.7	Yes	Page 16
3.8	Yes	Page 16
3.10	Yes	Page 16
3.11	Yes	Page 16
3.12	Yes	Page 16
4. Governance, Commitments, and Engagement		
4.1	Yes	Page 17
4.2	Yes	Page 17
4.3	Yes	Page 18
4.4	Yes	Page 18
4.14	Yes	Page 18
4.15	Yes	Page 18

STANDARD DISCLOSURES: Performance Indicators		
<i>Indicator</i>	<i>Reported</i>	<i>Location</i>
Economic performance		
EC1	Yes	Page 19
EC3	Yes	Page 20
Energy		
EN3	Yes	Page 23
Social: Labor Practices and Decent Work		
Employment		
LA1	Yes	Page 24
LA3	Yes	Page 24
Labor/management relations		
LA4	Yes	Page 24
LA5	Yes	Page 24
Occupational health and safety		
LA6	Yes	Page 24
LA7	Yes	Page 25
LA8	Yes	Page 25
LA9	Yes	Page 25
Training and education		
LA10	Yes	Page 25
LA11	Yes	Page 25
LA12	Yes	Page 25
Social: Human Rights		
Investment and procurement practices		
HR2	Yes	Page 26
HR3	Yes	Page 26
HR4	Yes	Page 26
Freedom of association and collective bargaining		
HR5	Yes	Page 26
Forced and compulsory labor		
HR7	Yes	Page 26
Security practices		
HR8	Yes	Page 26
Social: Society		
Corruption		
SO2	Yes	Page 26
SO3	Yes	Page 26
SO4	Yes	Page 26
Public policy		

S05	Yes	Page 27
S06	Yes	Page 27
Anti-competitive behavior		
S07	Yes	Page 27
Compliance		
S08	Yes	Page 27
Marketing communications		
PR7	Yes	Page 27
Customer privacy		
PR8	Yes	Page 27
Compliance		
PR9	Yes	Page 27

APPENDIX 2: GRI APPLICATION LEVEL TABLE

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Guidelines 3.1, which is the most commonly used disclosure methodology for measuring environmental, social, and governance performance.

Within this framework, there are three GRI application levels (A, B, C) that indicate the depth and maturity of a reporting company’s disclosure. The illustration below illustrates the differences between various application levels.

Report Application Level		C	C+	B	B+	A	A+
Standard Disclosures	Profile Disclosures	Report on: 1.1 2.1 - 2.10 3.1 - 3.8, 3.10 - 3.12 4.1 - 4.4, 4.14 - 4.15		Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5 - 4.13, 4.16 - 4.17		Same as requirement for Level B	
	Disclosures on Management Approach	Not Required	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured	Management Approach disclosed for each Indicator Category	Report Externally Assured
	Performance Indicators & Sector Supplement Performance Indicators	Report fully on a minimum of any 10 Performance Indicators, including at least one from each of: social, economic, and environment.**	Report Externally Assured	Report fully on a minimum of any 20 Performance Indicators, at least one from each of: economic, environment, human rights, labor, society, product responsibility.***	Report Externally Assured	Respond on each core and Sector Supplement* indicator with due regard to the materiality Principle by either: a) reporting on the indicator or b) explaining the reason for its omission.	Report Externally Assured

* Sector supplement in final version
 ** Performance Indicators may be selected from any finalized Sector Supplement, but 7 of the 10 must be from the original GRI Guidelines
 *** Performance Indicators may be selected from any finalized Sector Supplement, but 14 of the 20 must be from the original GRI Guidelines

NASDAQ OMX has self-declared this report to conform to GRI Application Level C, and this declaration has been submitted to GRI for confirmation and approval. This report includes all of the required information in the “C” column above, as well as a number of extra disclosures or indicators that are not expressly required at the C level. These additional disclosures are essential to a complete understanding of our sustainability effort.

In future reports, NASDAQ OMX will aspire to provide Level A or B disclosures. The company may also seek independent assurance of our sustainability disclosures by an outside third party. We are also better prepared to track and disclose our management approach in future reports, which is a key component of more detailed disclosures.

DISCLAIMER

This report was produced over the course of many months, encompassing the efforts of dozens of employees and contractors in a wide variety of global locations. Different reporting methodologies had to be synchronized and (in some cases) reworked in order to present unified data. For some of the required indicators, there was no existing source data.

Conforming to the GRI Reporting Protocol also required us to make methodology and calculation changes to some of our underlying data.

The information contained herein represents the most accurate and transparent sustainability disclosure that NASDAQ OMX can make at this time. As our sustainability effort matures, and as our internal systems become more efficient, we reserve the right to restate this data in future reports.