MARKETAXESS HOLDINGS INC.

WHISTLEBLOWER POLICY

The purpose of this policy is to state clearly and unequivocally that MarketAxess Holdings Inc. and its subsidiaries (collectively, the "Company") prohibit discrimination, harassment and/or retaliation against any employee, independent contractor or agency worker ("staff member") who provides information or otherwise assists in an investigation or proceeding regarding any conduct or suspectedconduct which he or she reasonably believes to be a violation of any laws or regulations, of any Company policy, or that is unethical. Everyone at the Company is responsible for assuring that the workplace is free from all forms of discrimination, harassment and retaliation prohibited by this policy. No officer, employee, agency worker, agent, contractor or subcontractor of this Company has the authority to engage in any conduct prohibited by this policy.

This policy protects any staff member who:

- Discloses an alleged violation of the federal securities laws, the federal laws regarding mail fraud, wire, radio or television fraud, or bank fraud, the rules or regulations of the U.S. Securities and Exchange Commission ("SEC"), or any provision of federal law relating to fraud against stockholders to a federal regulatory or law enforcement agency, any member or committee of Congress, any person with supervisory authority over the staff member, or any other person working for the Company who has the authority to investigate, discover or terminate conduct prohibited by this policy.

- Files, causes to be filed, testifies, participates in, or otherwise assists in a proceeding filed under the federal securities laws, the federal laws regarding mail fraud, wire, radio or television fraud, or bank fraud, the rules or regulations of the SEC, or any provision of federal law pertaining to fraud against stockholders.

- Makes a complaint, whether anonymous or otherwise, about questionable accounting, internal accounting controls, or auditing matters at the Company.

- Provides to a law enforcement officer any truthful information relating to the commission or possible commission of any federal offense.

If a staff member engages in any of the activities listed above, the Company will not discharge, demote, suspend, threaten, harass or otherwise discriminate or retaliate against him or her in the terms or conditions of employment because of that activity.

Any staff member who believes that he or she has been the subject of prohibited discrimination, harassment and/or retaliation or is aware of any conduct which may be prohibited by this policy is strongly encouraged to report immediately the facts forming the basis of that belief or knowledge to his or her supervisor, the Chief Executive Officer, the Chief Financial Officer or the General Counsel, anonymously or otherwise.

The staff member may also report such conduct by submitting a complaint, either anonymously or otherwise, to the Chairperson of the Company's Audit Committee or any member of the Board of Directors, or by using the Company's anonymous reporting procedures established by the Audit Committee. Any staff member who receives such a complaint or witnesses any conduct which may be prohibited by this policy must immediately notify his or her supervisor, the Chief Executive Officer, the Chief Financial Officer, the General Counsel, the Chairperson of the Audit Committee, or any member of the Board of Directors, or use the Company's anonymous and confidential reporting procedures established by the Audit Committee. Upon receiving a complaint, the Company will promptly conduct a thorough investigation. It is the obligation of all staff members to cooperate in such investigation. Those responsible for the investigation will maintain the confidentiality of the allegations of the complaint and the identity of the persons involved to the extent practicable, subject to the need to conduct a full and impartial investigation, remedy any violations of the Company's policies, or monitor compliance with or administer the Company's policies.

Nothing in this policy prohibits a staff member from reporting possible violations of federal or state law or regulations to any governmental agency or entity or self-regulatory institution, including but not limited to the EEOC, the NLRB, the Department of Justice, the SEC, Congress, and any Inspector General, or making other disclosures that are protected under the whistleblower provisions of federal or state law or regulation. Prior authorization of the Company shall not be required to make any such reports or disclosures and no staff member is required to notify the Company that they have made such reports or disclosures.

The investigation generally will include, but will not be limited to, discussion with the complaining employee (unless the complaint was submitted on an anonymous basis), the party against whom allegations have been made, and witnesses, if appropriate. The Company prohibits retaliation against any staff member who makes a complaint under this policy or participates in the Company's investigation.

In the event that an investigation establishes that a staff member has engaged in conductor actions constituting discrimination, harassment and/or retaliation in violation of this policy, the Company will take immediate and appropriate corrective action, up to and including termination of that individual's engagement with the Company.

This policy is in all respects subject and subordinate to the Company's Certificate of Incorporation and by-laws and the applicable provisions of the General Corporation Law of the State of Delaware. This policy may be amended from time to time by the Board.

Date: October 2004

Revised: January 2022

Last Reviewed: October 2024