

MARKETAXESS HOLDINGS INC.

POLITICAL CONTRIBUTIONS AND LOBBYING POLICY

I. PURPOSE

MarketAxess Holdings Inc. and its subsidiaries (hereinafter collectively referred to as “MarketAxess”) are affected by decisions of federal, state and local governments. Policy decisions of lawmakers and regulators at the federal, state, and local levels can significantly affect the business environment in which MarketAxess operates, especially because the financial industry in which MarketAxess engages in its core businesses is highly regulated.

Therefore, MarketAxess exercises its fundamental right and responsibility to participate in the political process through political contributions and lobbying. When it deems it in the best interest of its shareholders, MarketAxess will be an active participant in the political and policymaking process, including contributing to political campaigns via its political action committee (“PAC”), engaging with policymakers regarding its views on issues, and developing and maintaining strong working relationships with officials whose decisions impact MarketAxess’ business. These political engagement activities support MarketAxess’ objective of providing financial technology, financial services, and other related products and services in a responsible fashion.

MarketAxess believes that financial regulation is a critical public policy issue and is committed to engaging in the public policy process. This includes protecting and promoting the interests of our shareholders and carefully considering the needs and concerns of our stakeholders. MarketAxess also believes that transparency and accountability are important aspects of corporate political activity. That is why MarketAxess will provide disclosure of such activities. The following

sets forth MarketAxess' general policies for making corporate political contributions and lobbying efforts.

II. POLITICAL CONTRIBUTIONS

MarketAxess makes political contributions in the United States through its PAC. Our objective is to support political candidates, organizations and measures that are aligned with MarketAxess' business interests. Therefore, MarketAxess' PAC's political contributions are intended to be for the benefit of the Company and its shareholders and are made without regard to the personal political preferences of MarketAxess officers and executives, and comply with all applicable federal, state and local laws, rules and regulations. In addition, MarketAxess's PAC shall not knowingly contribute to candidates whose views and actions are inconsistent with MarketAxess' corporate values.

The Company's General Counsel shall have oversight over the Company's PAC's political contributions, payments to lobbyists, and payments to trade associations that use a portion of the dues for lobbying activity, and shall periodically update the Nominating and Corporate Governance Committee of MarketAxess' Board of Directors on the Company's PAC's political contribution and lobbying activities and the Company policies that govern these activities. Additionally, contributions are reported as required by law in the applicable jurisdiction where the contributions are made.

III. MARKETAXESS POLITICAL ACTION COMMITTEE.

The MarketAxess Holdings Inc. Political Action Committee ("MPAC") is a voluntary, non-partisan political action committee, registered with the U.S. Federal Election Commission ("FEC"), which allows eligible MarketAxess personnel (directors and employees) to pool their personal financial resources to help elect candidates seeking elective office at the federal level who share MarketAxess' views on issues important to MarketAxess business. Decisions about contributions to specific federal

candidates are made by members of the employee-led MPAC Board, with input from the company's political and governmental relations consultants. MPAC may support candidates from both parties for U.S. federal office. By policy, the MPAC may contribute only to qualified candidates for the U.S. Senate and the U.S. House of Representatives.

IV. LOBBYING

Lobbying is an important way for MarketAxess to participate in the legislative process. We lobby ethically, constructively and in a non-partisan manner. MarketAxess seeks to adhere to the highest ethical standards when engaging in lobbying, works to ensure that such activities align with corporate goals, and complies with all laws governing lobbying activities and disclosure.

MarketAxess engages in direct and indirect lobbying. Direct lobbying is conducted by our employees and contract lobbyists. Related activities that support our employees and contractors are referred to as indirect activities and may include research and analysis of pending legislation. These indirect activities are performed by both our employees and trade associations. Prior to engaging in lobbying activities, employees must obtain guidance from our Legal and Compliance Department. On an annual basis, the Nominating and Corporate Governance Committee reviews MarketAxess' lobbying activities and budget, including trade association memberships, to assess the value of these activities and ensure alignment with MarketAxess' positions and interests.

As an entity that employs and retains lobbyists, MarketAxess must comply with the congressional and executive branch gift rules as well as similar rules at the state and local level. MarketAxess and its employees will consult with counsel before a gift may be given to any covered government official.