

Cboe Global Markets, Inc. Audit Committee Charter

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Purpose and Authority

The purpose of the Audit Committee (the “Committee”) of the Board of Directors (the “Board”) of Cboe Global Markets, Inc. (the “Cboe Global Markets”) and its subsidiaries (the “Company”) is to assist the Board in discharging its responsibilities relating to:

- the qualifications, engagement and oversight of the Company’s independent registered public accounting firm(s);
- the Company’s accounting and financial reporting processes and disclosure matters; and
- the Company’s internal audit function and internal controls.

Membership

The Committee shall consist of at least three (3) Directors, all of whom must be “independent” within the meaning given to that term in Cboe Global Markets’ Bylaws and Corporate Governance Guidelines, meet the requirements for independence set forth in Rule 10A-3(b)(1) under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), and not have participated in the preparation of the financial statements of the Company in the past three years. It is the intention of Cboe Global Markets that members of the Committee shall not simultaneously serve on the audit committee of more than two other public companies.

Each Director serving on the Committee shall be financially literate, as such qualification is interpreted by the Board in its business judgment. In addition, at least one Director serving on the Committee shall be an “audit committee financial expert” as defined by the Securities and Exchange Commission (the “SEC”). The Directors serving on the Committee (including the chairperson thereof) shall be appointed by the Board on the recommendation of the Nominating and Governance Committee of the Board. Directors serving on the Committee may be removed by the Board in accordance with Cboe Global Markets’ Bylaws.

If a Director serving on the Committee ceases to be a Director, the individual shall thereupon cease to serve on the Committee.

Meetings

The Committee shall meet when it deems necessary to fulfill its purpose and responsibilities, but shall meet at least four (4) times each year. The Committee shall establish its own schedule and agenda, coordinated by its chairperson. The chairperson of the Committee or any Director serving on the Committee may call special meetings of the Committee. The chairperson of the Committee, or his or her designee, shall provide each Director serving on the Committee with prior notice of any such meeting in accordance with the procedures for giving notice of special meetings of the Board as set forth in Cboe Global Markets' Bylaws.

The Committee shall meet periodically in separate executive sessions with senior management, the Chief Audit Executive and the Company's independent auditor.

The Committee shall maintain written minutes of its meetings. The Committee may meet by means of conference telephone or other communications equipment in accordance with Cboe Global Markets' Bylaws and may take action by unanimous written consent. A majority of the Directors serving on the Committee shall constitute a quorum. A majority of the Directors serving on the Committee present at any Committee meeting at which a quorum is present may act on behalf of the Committee. The failure to comply with the requirements of this Charter or any applicable exchange rule or other regulation shall not by itself invalidate any corporate action taken by the Committee.

Responsibilities of the Committee

In furtherance of the Committee's purpose, and in addition to any other responsibilities that may be properly assigned by the Board to the Committee, the Committee shall have the following authorities and responsibilities. The Committee shall comply with all applicable provisions of the Sarbanes-Oxley Act of 2002, the Exchange Act and the rules and regulations of the SEC and the Cboe BZX Exchange, Inc.

Independent Registered Accounting Firm

- (a) Engagement and Oversight. The Committee shall be directly responsible for the appointment, compensation, retention, termination and oversight of the work of the Company's independent auditor and any registered public accounting firm performing other audit, review or attest services for the Company. Such firms shall report directly to the Committee with respect to such services. The Committee shall evaluate the independent auditor's qualifications, performance and independence.

The Committee shall have the authority to recommend to the Board the independent auditor for stockholder ratification.

The Committee shall review with the independent auditor its scope, plan, staffing and procedures to be used in conducting the annual audit. The Committee is responsible for reviewing a formal written statement from the outside auditor delineating all relationships between the auditor and the Company. The Committee shall maintain active dialogue with

the auditor with respect to any disclosed relationships or services that may impact the objectivity and independence of the auditor.

At the conclusion of the audit, the Committee shall review and discuss the audit results, including any comments or recommendations of the independent auditor and the response of management to such recommendations.

- (b) Policy for Hiring Employees of Independent Auditor. The Committee shall review and approve a policy for the hiring of current or former employees of any registered public accounting firm performing audit, review or attest services for the Company.

Financial Statements, Disclosure and other Compliance Matters

- (c) Annual Reporting. Prior to the filing of the report of the independent auditor with the SEC, the Committee shall also consider any communications or materials from the independent auditor, including:

- critical audit matters, policies and practices, and any changes from the last audit report;
- alternative treatments of financial information within generally accepted accounting principles that have been discussed with management, the ramifications of the use of such alternative disclosures and treatments, and the treatment preferred by the independent auditor;
- other material written communications between the independent auditor and management, such as any management letter or schedule of unadjusted differences;
- any material differences or disputes with management encountered during the course of the audit, along with the resolution of such differences or disputes;
- matters required to be discussed with the Committee by the independent auditor pursuant to Auditing Standard No. 1301 or any successor standard;
- the design and implementation of internal controls, and the independent auditor's report on the Company's internal controls;
- whether any illegal acts have been detected by or otherwise come to the attention of the independent auditor in the course of the audit;
- the Company's major financial risk exposures and the steps management has taken to monitor and control such exposures; and
- such other matters as the Committee deems appropriate.

The Committee shall also review with the Chief Executive Officer and Chief Financial Officer the processes implemented for them to meet the certification requirements of Sections

302 and 906 of the Sarbanes-Oxley Act of 2002 and shall make recommendations as the Committee deems necessary. The Committee shall recommend to the Board whether or not the audited financial statements should be included in Cboe Global Markets' Annual Report on Form 10-K. The Committee will produce an audit committee report for inclusion in Cboe Global Markets' annual proxy statement or Annual Report on Form 10-K.

- (d) Periodic Financial Statements. The Committee shall review Cboe Global Markets' annual and quarterly financial statements, and the audited annual financial statements of any significant subsidiary of Cboe Global Markets, with management and the independent auditor prior to the filing thereof with the SEC or any other regulator, and as the Committee otherwise deems appropriate or necessary. Such review shall include significant changes in accounting principles or the application thereof, the "Management's Discussion and Analysis of Financial Condition and Results of Operations" disclosure, earnings press releases and financial information and other public earnings guidance. The Committee may delegate such review of the audited annual financial statements of any significant subsidiary of Cboe Global Markets to the applicable subsidiary's Board of Directors or Committee thereof.

The Committee's review shall encompass, as applicable:

- any major issues regarding:
 - accounting principles and financial statement presentations, including any significant changes, and
 - the adequacy of internal controls and any special audit steps adopted in light of material control deficiencies;
- any analyses setting forth significant financial reporting issues and judgments, including the effects of alternative GAAP methods and off-balance sheet structures;
- any effect of regulatory and accounting initiatives on the financial statements; and
- the type and presentation of information to be included in earnings press releases, including any use of "pro forma", "organic" or "adjusted" non-GAAP information.

Internal Audit Function and Internal Controls

- (e) Internal Audit. The Chief Audit Executive shall report functionally to the Committee and administratively to the senior management consistent with the standards promulgated by the Institute of Internal Auditors. The Committee shall oversee and periodically evaluate the performance, responsibilities, organizational reporting lines, budget and staffing of the internal audit function of the Company, as well as the internal audit plan. The Committee shall have the authority to take those actions that it deems advisable in connection with such evaluation. The Committee shall review and must concur in the appointment,

replacement or dismissal of the Chief Audit Executive. The Committee shall review the results of significant internal audits.

- (f) Internal Controls. In addition to its review in connection with periodic reporting, the Committee shall periodically review the adequacy and effectiveness of internal controls and procedures, and may take appropriate action with respect to any significant deficiencies or material weaknesses in them, and any irregularities involving management or other employees with a role in the controls and procedures. The Committee shall review the adequacy of internal controls with management, the independent auditor and the internal audit staff. In particular, the Committee shall review any issues related to the Company's disclosure controls and procedures and internal control over financial reporting, including any alleged fraud.

Corporate Oversight

- (g) Receipt of Complaints. The Committee shall review and discuss with management any complaints received by the Company regarding accounting, internal accounting controls or auditing matters, as well as the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters.
- (h) Financial Reporting Risk. The Committee is responsible for overseeing the Company's risk assessment and risk management with respect to financial reporting. The Committee shall review and discuss with management and may make recommendations to the Board regarding the Company's financial reporting risks and the steps and mitigating activities used by the Company to monitor and control such risks.
- (i) Internal Investigations. The Committee shall have the authority to conduct or authorize investigations into any matters within the scope of the Committee.
- (j) Related Party Transactions. Pursuant to the Audit Committee Policy with respect to Related Persons Transactions, the Committee shall conduct a review of transactions with related persons for potential conflict of interest situations on an ongoing basis and shall be responsible for approving or ratifying any such transaction, including any transaction requiring disclosure under Item 404 of Regulation S-K under the Exchange Act, subject to such exceptions as may be approved by the Committee.

Miscellaneous

- (k) Audit Committee Pre-Approval Policy. The Committee shall review and approve a policy with respect to the process by which the Committee will engage a registered public accounting firm to prepare or issue an audit report or related work, or to perform other audit, review or attest services for the Company.
- (l) Retention of Advisors. In carrying out its duties, the Committee is authorized to take all actions that it deems necessary or appropriate and may draw upon and direct the internal resources of the Company and may engage legal counsel (which may be, but need not be, the regular corporate counsel to the Company) and other advisors as it shall deem desirable from time to time, at the cost and expense of the Company. The Committee shall have sole

authority to determine and approve related fees and retention terms for any independent counsel or other advisors engaged by the Committee.

- (m) Performance Evaluation. The Committee shall conduct such annual and other self-evaluations as it deems appropriate, including to satisfy any applicable requirements of any applicable exchange and any other legal or regulatory requirements.
- (n) Reporting to the Board. The Committee shall report to the Board as it deems appropriate, and as the Board may request.
- (o) Other Activities. The Committee shall perform other activities consistent with this Charter, Cboe Global Markets' Charter and Bylaws, governing law, the rules and regulations of any applicable exchange and such other requirements applicable to the Company as the Committee deems necessary or appropriate.
- (p) Committee Charter and Policy Review. The Committee shall annually review and evaluate the adequacy of this Charter, the pre-approval policy, and the independent auditor hiring policy, and shall recommend any changes to this Charter to the Board as the Committee deems necessary or desirable, including to satisfy any applicable requirements of any exchange and any other legal or regulatory requirements. A copy of this Charter shall be made available on the Company's website at www.cboe.com.

Funding

The Company shall provide for appropriate funding, as determined by the Committee, for:

- the payment of compensation to any registered public accounting firm engaged for the purpose of preparing or issuing an audit report or performing other audit, review or attest services for the Company;
- compensation to any advisers employed by the Committee in accordance with this Charter; and
- ordinary administrative expenses of the Committee that are necessary or appropriate in carrying out its duties.

Last Adopted Date	8/19/2021
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