

**Report of Organizational Actions
Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name NYSE Euronext		2 Issuer's employer identification number (EIN) 20-5110848	
3 Name of contact for additional information Martin Hunter	4 Telephone No. of contact 770-857-4700	5 Email address of contact Martin.Hunter@theice.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 2100 RiverEdge Pkwy, Suite 500		7 City, town, or post office, state, and Zip code of contact Atlanta, GA 30328	
8 Date of action November 13, 2013	9 Classification and description NYSE Euronext common shares		
10 CUSIP number 629491101	11 Serial number(s)	12 Ticker symbol NYX	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

- 14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ See attached statement.
- 15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ See attached statement.
- 16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ See attached statement.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ IRC Sections 302, 356, 358, and 368 (a)

18 Can any resulting loss be recognized? ▶ NYSE Euronext shareholders who made the Stock Election or the Standard Election will not recognize loss as a result of the NYSE Euronext Merger, except for possible loss recognized in connection with cash received in lieu of a fractional share. NYSE Euronext shareholders who made the Cash Election and who are treated as having sold their shares may recognize loss as a result of the NYSE Euronext Merger.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The adjustment to basis would be taken into account in the tax year of the shareholder during which the merger occurred (e.g., 2013 for calendar year taxpayers).

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ▶ Martin Hunter Date ▶ 12/6/13

Print your name ▶ Martin Hunter Title ▶ SVP Tax and Treasurer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	David Sharkey	<u>David Sharkey</u>	12/6/13		P00542072
	Firm's name ▶ Deloitte Tax LLP			Firm's EIN ▶ 86-1065772	
	Firm's address ▶ 191 Peachtree Street, Suite 2000 Atlanta, GA 30303			Phone no. 404-220-1500	

**NYSE Euronext
EIN: 20-5110848
Attachment to Form 8937**

Form 8937 Part II, Line 14

On November 13, 2013, NYSE Euronext (“NYSE Euronext”) merged with and into NYSE Euronext Holdings LLC (“NYSE Euronext Holdings”), a wholly owned subsidiary of IntercontinentalExchange Group, Inc. (“ICE Group”), with NYSE Euronext Holdings surviving (the “NYSE Euronext Merger”). As a result of the NYSE Euronext Merger, each share of NYSE Euronext common stock was exchanged for one of the following: (a) 0.1703 shares of ICE Group common stock and \$11.27 in cash (the “Standard Election”); (b) \$33.12 in cash (the “Cash Election”); or (c) 0.171200756 shares of ICE Group common stock and \$11.154424 in cash (the “Stock Election”) (because the Stock Election was substantially oversubscribed, each NYSE Euronext shareholder that made the Stock Election received the consideration described in (c) in lieu of receiving only shares of ICE Group common stock). Shareholders that failed to make a valid election prior to the election deadline were deemed to have elected the Standard Election. No holder of NYSE Euronext common stock was issued a fractional share of ICE Group common stock in the NYSE Euronext Merger, but instead, each such holder received an amount in cash equal to the value of such fractional share of ICE Group common stock at the time of the NYSE Euronext Merger.

Form 8937 Part II, Line 15

Our outside counsel has opined that the NYSE Euronext Merger constituted a reorganization under section 368(a) of the Internal Revenue Code, as amended (the “IRC”). The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Further discussion of the tax consequences of the NYSE Euronext Merger can be found in the Form S-4 for the Company, as filed with the Securities and Exchange Commission on April 30, 2013, under the heading “Material United States Federal Income Tax Consequences of the Mergers – Federal Income Tax Consequences of the NYSE Euronext Merger” (available at <http://www.sec.gov/Archives/edgar/data/1571949/000119312513184435/d461946ds4a.htm>).

As a result, each NYSE Euronext shareholder who made the Standard Election or the Stock Election generally will recognize gain (but not loss) in an amount equal to the lesser of (1) the amount by which the sum of the fair market value of the ICE Group common stock and cash received (excluding any cash received in lieu of a fractional share) by a holder of NYSE Euronext common stock exceeds such holder’s tax basis in its NYSE Euronext common stock, and (2) the amount of cash received by such holder of NYSE Euronext common stock (excluding any cash received in lieu of a fractional share).

Each such NYSE Euronext shareholder’s basis in a share of ICE Group common stock received pursuant to the NYSE Euronext Merger will depend upon the shareholder’s particular circumstances, including, for example, its basis in its NYSE Euronext common stock exchanged therefor, the amount of cash received, and whether the shareholder recognized any gain under the

rules described above. Generally, the tax basis of a share of ICE Group common stock received in the NYSE Euronext Merger will be the same as the shareholder's aggregate tax basis of the NYSE Euronext common stock exchanged therefor, decreased by the sum of any money received (excluding any cash received instead of fractional share interests in ICE Group common stock), and increased by the amount of any gain or dividend income recognized in the exchange (excluding any gain recognized with respect to cash received in lieu of a fractional share of ICE Group common stock) (the result, "Adjusted Tax Basis").

For each NYSE Euronext shareholder who made the Cash Election, and who is treated as having sold its shares in a transaction where capital gain or loss is recognized, all of such shareholder's basis would be recovered and used in determining the amount of capital gain or loss.

Form 8937 Part II, Line 16

Under applicable federal income tax rules, the fair market value of each share of ICE Group common stock received in the NYSE Euronext Merger on November 13, 2013 is \$199.61. This is the average of the high number \$201.427 and low number \$197.807 price, for such common stock on November 13, 2013.

Where one share of ICE Group common stock is received in exchange for more than one share of NYSE Euronext common stock, the Adjusted Tax Basis must be allocated to the shares of ICE Group common stock (or allocable portions thereof) received in a manner that reflects, to the greatest extent possible, the basis in the shares of NYSE Euronext common stock that were acquired on the same date and at the same price. To the extent it is not possible to allocate the Adjusted Tax Basis in this manner, the Aggregate Tax Basis in the NYSE Euronext common stock surrendered must be allocated to the ICE Group common stock (or allocable portions thereof) received in a manner that minimizes the disparity in the holding periods of the NYSE Euronext common stock whose basis is allocated to any particular share of ICE Group common stock received.