

Part II Organizational Action (continued)

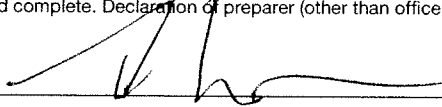
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attachment

18 Can any resulting loss be recognized? ▶ NO

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ N/A

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.

Sign Here

Signature ▶  Date ▶ 1/17/12

Print your name ▶ ANDREW CHO Title ▶ VICE PRESIDENT OF TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

Attachment to Form 8937

Part II – Organizational Action

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.

NYSE Euronext ("NYX") made cash distributions to NYX shareholders in excess of its current and accumulated earnings and profits during 2011.

NYX made the following cash distributions:

<u>Date of Distribution</u>	<u>Amount</u>
March 14, 2011	\$78,324,963
June 14, 2011	\$78,324,963
September 13, 2011	\$78,324,963
December 13, 2011	\$78,324,963
Total	\$313,299,853

The information set forth on this Form 8937 applies only to NYX shareholders who received cash distributions in 2011.

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.

Upon receipt of each cash distribution paid in 2011, a NYX shareholder should reduce (but not below zero) its adjusted basis in such holder's shares of NYX common stock by \$0.18719 per share.

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.

NYX calculated the amount of its current and accumulated earnings and profits, for federal income tax purposes. Based on this calculation, NYX determined that the aggregate amount of cash distributed by NYX to its shareholders in 2011 (\$313,299,853) exceeded the amount of its current and accumulated earnings and profits, by \$195,491,519. Accordingly, the portion of each quarterly dividend of \$0.30 per share of NYX common stock that was not treated as a dividend is equal to 62.39758% ($\$195,491,519/\$313,299,853$), or \$0.18719.

The portion of each cash distribution that is made out of current or accumulated earnings and profits will be treated as a dividend for federal income tax purposes. Distributions that are not treated as dividends for federal income tax purposes will be treated as a tax-free return of capital to the extent of (and will be applied against and reduce, but not below zero) a shareholder's adjusted tax basis in its shares of NYX common stock. Any excess will be treated as gain realized on the sale or other disposition of NYX common stock.

The above analysis of the corporation's earnings and profits was prepared based on information available to NYX on the date hereof. If this information changes after the date hereof, NYX intends to amend this Form 8937.

17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

IRS Section 316, 301(c)(2) .