



EUROPEAN MARKETS DATA POLICIES

Version: 1.2

UNDER THE TERMS OF THE NASDAQ GLOBAL DATA AGREEMENT, DISTRIBUTORS OF NASDAQ INFORMATION MUST ADHERE TO THE FOLLOWING EUROPEAN DATA POLICIES. NASDAQ WILL UPDATE THESE POLICIES PERIODICALLY, AND INTERIM UPDATES WILL BE COMMUNICATED VIA NASDAQ DATA NEWS ([CLICK HERE](#)).

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1. PRICING CLARIFICATIONS

OVERVIEW

The below clarifications are intended to clarify certain fees within each market. The policies below are in effect unless otherwise noted on the European Markets Data price list published on <https://www.nasdaq.com/solutions/european-pricing-policies>.

Pricing Clarifications:	
Distributor Fees	<p>The External Distributor Fee for a data product generally includes the Internal Distributor Fee for that data product (See exceptions in the Pricing Clarifications section). The Real Time Administrative Fee includes the Delayed Administrative Fee for the Information received (for details see: http://www.nasdaqtrader.com/Trader.aspx?id=DataPolicies).</p> <p>Private External Distributor fee is generally included in Business External Distributor fees.</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none">• NORDIC AND BALTIC DELAYED DATA FEED RECIPIENT FEE: If the information is received in real-time and then delayed by the Distributor, the Distributor will be entitled to the information in a delayed format free of charge (see Policy Related Use Cases/Data News Clarifications).
Administration Fee	<p>Nasdaq currently assesses an Administration Fee for certain information provided to Distributors both internal and external. Distributors will be invoiced for the appropriate Administration Fee upon approval, please refer to the below links for details: https://www.nasdaq.com/solutions/european-pricing-policies. For Distributors of Nasdaq Information, the Administration Fee varies based on which data sets are received by the Distributor, and whether the data is received on a real-time or delayed basis. All Nasdaq proprietary exchange data received directly from Nasdaq is deemed real-time information; data received by a Redistributor may be considered delayed.</p>
Nordic Equity	<p>Nordic Equity Norwegian (Oslo) is not currently fee-liable.</p>

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	<p>Nordic Equity on-exchange reported trades information and Nordic Equity information from Nasdaq APA is included with the Nordic Equity at no additional cost. A Subscriber entitled to Nasdaq APA Information is only fee-liable at the underlying product rates. This policy applies to: Nordic Equity Level 1, Nordic Equity Level 2, Nordic Equity TotalView, Nordic & Baltic Equity Last Sale and Nordic Equity Post trade.</p>
Nordic Derivatives	<p>Nordic Derivatives Norwegian (Oslo) is not currently fee-liable.</p> <p>Nordic Derivatives information from Nasdaq APA is included with the Nordic Derivatives entitlements at no additional cost. A Subscriber entitled to Nordic Derivatives Nasdaq APA Information is only fee-liable at the underlying product rates. This policy applies to: Nordic Derivatives Level 2, Nordic Derivatives TotalView and Nordic Derivatives Post trade.</p>
Nordic Fixed Income	<p>Nordic Fixed Income information from Nasdaq APA is included with the Nordic Fixed Income entitlements in GCF (Genium Consolidated Feed) at no additional cost. A Subscriber entitled to Nordic Fixed Income information from Nasdaq APA is fee-liable at the underlying product rates. This policy applies to: Nordic Fixed Income and Nordic Fixed Income Post trade.</p>
Nasdaq Fixings	<p>Contributors of quotes to the calculations of Fixings are not liable for the Nordic Fixings product charges when using the fixings for internal usage only.</p> <ul style="list-style-type: none"> • The Nordic Fixed Income External Distributor fee includes the Nordic Fixings External Distributor Fee • Nordic Fixed Income End-of-Day does not include Nordic Fixings data
Commodities	<p>Commodity information from Nasdaq APA is included with the Commodity entitlements at no additional cost. A Subscriber entitled to Nasdaq APA Information only is fee-liable at the underlying product rates. This policy applies to: Commodities Level 2, Commodities TotalView and Commodities Post trade.</p>
Reference & Supplementary Data	<p>An Equity or Derivatives TotalView-ITCH entitlement includes access to Nordic and Baltic Reference Data. Equity ITCH Distributors are permitted to access the Nordic and Baltic Reference Data in File Delivery Service (FDS) for no additional charge. Derivatives ITCH and Commodities ITCH Distributors are permitted to access the Nordic Reference Data either from File Delivery Service (FDS), or Auxiliary Market Data (AMD). Supplementary GCF data is also included.</p>

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Nordic and Baltic Data Direct Access	Internal only Distribution of Nordic Information received via a direct connection is not currently liable for the Nordic Direct Access fee. "Direct Access" means receipt of Information from any connection entitled for Nordic Equity TotalView-ITCH, Nordic Derivatives TotalView-ITCH or OMNet API and Commodities TotalView-ITCH or OMNET API. Baltic Direct Access is not currently fee liable for a direct access fee.
LBMA Trade Data	<p>LBMA Trade Data enterprise licenses include derived and non-display usage for internal usage. Non-display or derived usage is not allowed for other LBMA Trade Data products.</p> <p>It is not allowed to use the LBMA Trade Data as a Benchmark or in connection with the determination of a Benchmark.</p> <p>LBMA Trade Data is not eligible for delayed pricing and will not be free after midnight</p>

PRODUCT-SPECIFIC PRICE CLARIFICATIONS

Pricing Clarifications:	
Nordic Equity, Nordic Fixed Income, Nordic Derivatives and Commodities	<p>Distributors paying the Nordic End-of-Day [Nordic Equity, Nordic Fixed Income, Nordic Derivatives, and Commodities] Redistribution Licenses are permitted to provide the information to Subscribers using the data internally before the Midnight (Local Time) Delay Interval. Distributors are required to ensure Subscribers providing the data externally before the Midnight (Local Time) Delay Interval receive prior approval from Nasdaq to become a Distributor.</p> <p>Nordic End-of-Day Information delivered in real-time via a text television technology is not fee-liable.</p>
Nordic Index Data	Distributors paying the Nordic Index Calculation Plus License must ensure such Recipients are contractually prohibited from using Nordic End-of-day information for non-index related activities.
Baltic Index Data	Distributors paying the Baltic Index Calculation License must ensure such Recipients are contractually prohibited from using Baltic End-of-day information for non-index related activities.

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Nordic Derivatives	Recipients of Nordic Derivatives TotalView ITCH can get access to Nordic Derivatives Auxiliary Market Data (AMD) as part of the Nordic Derivatives TotalView Entitlement.
Commodities	Recipients of Commodities TotalView ITCH can get access to Commodities Auxiliary Market Data (AMD) as part of the Commodities TotalView entitlement.
LBMA Trade Data	<p>The external distribution entitlement is only for vendors distributing the data externally.</p> <p>Any internal usage by an external distributor of LBMA Trade Data is not covered by the LBMA Trade Data Distribution License. The LBMA Trade Data Weekly product provides access to a weekly report and can be used on a distributors own web-site, in journals and for research.</p> <p>The reporting of LBMA Trade Data subscriber(s) for external distribution is only required for active subscribers.</p>
ESG Database access – Internal	Distributors eligible for this enterprise license purchase a full twelve months of the license in advance for the monthly fee in the price list, which should be paid in monthly installments. After the initial period, the annual enterprise license shall automatically renew for additional periods of twelve (12) months unless either Party provides notice of its intent not to renew the service a minimum of ninety (90) days prior to the end of the existing license. Notwithstanding any other provision of the policy of the Global Data Agreement, neither Party shall have the right to terminate the service for convenience.
ESG Distributors - Private	Distributors eligible for this enterprise license purchase a full twelve months of the license in advance for the monthly fee in the price list, which should be paid in monthly installments. After the initial period, the annual enterprise license shall automatically renew for additional periods of twelve (12) months unless either Party provides notice of its intent not to renew the service a minimum of ninety (90) days prior to the end of the existing license. Notwithstanding any other provision of the policy of the Global Data Agreement, neither Party shall have the right to terminate the service for convenience.
ESG Distributors - Business	Distributors eligible for this enterprise license purchase a full twelve months of the license in advance for the monthly fee in the price list, which should be paid in monthly installments. After the initial period, the annual enterprise license shall automatically renew for additional periods of twelve (12) months unless either Party provides notice of its intent not to renew the service a minimum of ninety (90) days prior to the end of the existing license. Notwithstanding any other provision of the policy of the Global Data Agreement, neither Party shall have the right to terminate the service for convenience.

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Salmon index	Salmon index Contributors with a Contributor Agreement with Nasdaq Copenhagen can access Salmon portal for internal use at no extra cost.
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MEMBER-SPECIFIC PRICING CLARIFICATIONS:

Member Pricing Clarifications:	
Nordic Equity – Members	<p>Equity Members may receive the following information free of charge:</p> <ul style="list-style-type: none"> • Equity Information from the ITCH feed if the information is used as set forth in the Nordic Member Rules. • Liquidity Providers on the Nasdaq Helsinki Equity Market who have signed a Liquidity Provider agreement with Nasdaq Helsinki are not fee-liable for non-display use of the Finnish Equity Information received via INET ITCH when specifically used in their liquidity providing operations.
Nordic Fixed – Income Members	<p>Fixed Income Members may receive the following information free of charge:</p> <ul style="list-style-type: none"> • Fixed Income information from the OMNET API if the information is used as set forth in the Nordic Member Rules.
Commodities – Members	<p>Commodities ITCH is not covered by Commodities Member Rules. All Commodities Members that utilize ITCH to connect to the Nasdaq Commodities Exchange will be required to sign a Nasdaq Global Data Agreement (GDA) and are fee-liable at the underlying product rates. Commodities Members may receive the following information free of charge:</p> <ul style="list-style-type: none"> • Commodities Information from the OMNet API if the information is used as set forth in the Commodities Member Rules. Only internal usage is covered by the Commodities Member rules; for all other use, Members must sign the GDA. • “Internal usage” means use within the Exchange Member firm by the Member’s authorized Exchange Traders, back office personnel, employees involved in the supervision of the Exchange Member’s technical equipment directly connected to OMNET API, employees engaged in risk monitoring or analysis of the Exchange Member’s trading, and consultants or contractors working as employees or under an outsourcing arrangement (consultant and contractors are regarded as employees). It shall also include usage within the Exchange Member’s business related to the following areas: <ul style="list-style-type: none"> ○ Use by registered, certified traders

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- Clearing and settlement
- A non-systematic use of information for support of customers in the trading of securities of trading securities
- Risk management of member trade
- Other usage as excluded in Fee Exemptions Policy

Other employees of the Exchange Member and any employees of affiliates of the Exchange Member do not constitute internal users. Usage within the following areas is also excluded:

- Any non-employee usage
- For Market Makers which have signed a Market Maker agreement with the exchange, all non-display uses of Commodities Information received via OMNET API are not fee-liable when used in the market making operations.
- Non-employee order-routing
- Non-employee sponsored access/direct market access
- Any usage sourced from a vendor/Distributor Data Feed

Nordic Derivatives Members

Nordic Derivatives Information is provided via several direct connections, including OMNET API and ITCH. The connection used to access Nordic Derivatives Information directly from Nasdaq will alter the fee liability associated with the receipt and distribution of Nordic Derivatives Information. When reviewing the associated pricing, please also refer to the Member Rules and Regulations of Nasdaq Derivatives Markets.

- OMNET API is covered by the Member Rules and allows all Nordic Derivatives Members to receive and internally distribute Nordic Derivatives Information for “Internal Usage” as defined by the Member Rules. Any and all other use of Derivatives Information sourced from OMNET API and utilized outside of the Member Rules requires a signed Global Data Agreement (GDA) and is fee-liable at the Nordic Derivatives rates as provided in the [price list](#).
- Nordic Derivatives ITCH is not covered by the Member Rules. All Members that utilize Nordic Derivatives ITCH to connect to the Nordic Derivatives Exchange will be required to sign the GDA and are fee-liable at the underlying rates unless the Member is otherwise excluded per the criteria below:
 - Qualifying Market Makers (QMM) are Members that sign a qualifying market making agreement with the Nordic Derivatives Exchange. QMM are defined in chapter 2, section 2.7, of the Member Rules. All non-display and display uses of Derivatives Information received via ITCH or OMNET API are not fee-liable when used as part of market making operations. Also QMM are entitled to a reduced price on Nordic Equity non-display usage related only to their market making in Nasdaq Equity Derivatives instruments.

- Liquidity Providers (LP) are Members that sign a liquidity provider form with the Nordic Derivatives Exchange. All non-display and display uses of Derivatives Information received via ITCH or OMNET API are not fee-liable when used specifically in liquidity providing operations and other usage as specifically excluded in the Exemptions Policy.
- Qualifying Market Makers or Liquidity Providers that are only receiving Nordic Derivatives Information from Nordic Derivatives Clearing Members, and from no other source, are not fee-liable for the internal use of Nordic Derivatives Information when used as part of their Market Making or Liquidity Provider business, but the Clearing Member will be liable for the relevant external Distributor fees.
- Market Makers that have signed a non-qualifying market making agreement will not be fee exempt as described above.

Please note the following for clarification: All usage by a QMM or LP outside of their market-making or liquidity-providing operations, including all non-display usage, is fee-liable at the underlying product rates. This includes, but is not limited to, the following:

- External Distribution; or
- Trading on non-Market Making accounts, or specified LP accounts, or the Member Rules; or
- High frequency trading as defined by ESMA. “Trading activities that employ sophisticated, algorithmic technologies to interpret signals from the market and, in response, implement trading strategies that generally involve the high frequency generation of orders and a low latency transmission of these orders to the market”. Related Trading strategies mostly consist of either quasi market making or arbitraging within very short time horizons. They usually involve the execution of trades on own account (rather than for a recipient) and positions usually being closed out at the end of the day; or
- Pre-Trade Risk Management of Sponsored Access or Direct Market Access Order Flow; or
- LPs that do not meet the qualification criteria in the Liquidity Provider fee list for two consecutive months

Members of Nasdaq Derivatives Markets receiving Direct Access to Commodities order books though their derivatives membership will be able to use the commodities data as stated in the Member Rules and Regulation for the derivatives market for free. All other uses are fee-liable.

2. DERIVED DATA

POLICY OVERVIEW

Derived Data Distribution – New Original Works licenses gives the distributor the right to utilize real time data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq market data.

SINGLE SECURITY DERIVED DATA POLICY

Single security derived data for **Equity-, Derivatives- and Commodities- securities** that contains price or quote data, and is based upon a single security symbol, **and is created in whole or in part from Nasdaq Nordic and Baltic Information** will generally be fee liable at the underlying product rates.

For example: displaying a price of a single Nasdaq Nordic equity security in real-time that is comprised with prices from other trading venues is not considered to be Derived data and is fee liable at underlying real-time subscriber product rates. Examples of single security data that are not considered to be Derived Data and are fee liable at the underlying product rates include (but are not limited to):

- Displaying the price of a security near or at the inside
- Equity curves
- Alert messages with prices
- Binary options data
- Indicative equity quotes
- Analytical or graphical representations with prices
- Alerts that meet preset criteria set by the Subscriber
- Contracts for Difference (CFD)
- Display of auto-quotes
- Price valuations for individual securities
- Spread transactions & Spread based derivative instruments
- Use of Nordic margin price data to create a derived data product

The use cases of single security Derived Data that will be considered as derived and not liable for the underlying product rates are:

- Certain Trading Platform publications: See below section: Trading Platform Derived Data Policy
- Derived Data used for Net Asset Value [NAV] calculations for funds listed on Nasdaq Nordic is not fee-liable
- Derived Data used for calculations for ETP/ETN and similar instrument types listed and traded exclusively on Nasdaq Nordic exchanges is not fee-liable

- Calculating Volume Weighted Average Price (“VWAP”) – where a Distributor or SI takes Nordic data and uses volume and share price parameters to calculate VWAP – used to measure average price weighted by volume. From the VWAP value, it is not possible to reverse engineer the price, or the volume
- Signal creation - where a Distributor uses data in real-time to create signals like buy/sell indicators, graphical representation of buy/sell indicators, charts and other non-price related graphical representations
- Internal usage of Nasdaq LBMA Derived Data is not fee-liable with a Nasdaq LBMA enterprise license. Nasdaq LBMA derived data is not fee-liable when distributed to controlled terminals of Nasdaq LBMA data, but where used outside a controlled terminal, it requires a separate Nasdaq LBMA enterprise license. For all other Nasdaq LBMA products derived data is not allowed
- An index future instrument derived from an index will follow index derived policy.

If your firm is unsure about a specific use case, please submit your use case to your Nasdaq Representative for a determination.

MULTIPLE SECURITY DERIVED DATA POLICY

Multiple security Derived Data that contains price data and is not based upon a single security symbol will generally not be fee liable at the underlying product rates, and Distributors will be liable for the relevant Derived Data fee.

Examples include:

- Portfolio valuation: creation of the asset value of a portfolio of securities (multiple securities). Examples include, but are not limited to: Mutual Fund Valuations (NAVs), or Hedge Fund Valuations
- Creation of prices for certain products that contain multiple security information, such as derivatives based on combinations of multiple securities where the underlying single security price information cannot be reverse engineered

For Nordic Equity, Nordic Fixed Income, Nordic Derivatives, Nasdaq Commodities and Baltic Equity and Fixed Income; Derived Data Fees do not include the right to create real-time indexes. If using the data to create real-time indexes, only the Index calculation fees would apply. If using for both Derived Data and indexes, then both fees would apply.

If your firm is unsure about a specific use case, please submit your use case to your Nasdaq Representative for a determination.

TRADING PLATFORM DERIVED DATA POLICY

A Trading Platform operator is liable for a fee if the data used is sourced from Nasdaq either directly or indirectly via a data vendor. If a trading platform receives data from multiple sources including Nasdaq, it is required to have entitlements, controls, and mechanisms to demonstrate how the data is utilized for pricing and quoting.

Examples of derived usage – note that this list is not exhaustive and does not limit what Nasdaq will consider to be fee liable at the underlying product rates or Trading Platform fee including display fees:

- Delaying a quote insignificantly is not considered to be Derived Data. All data delayed with less than 15 minutes is considered to be real-time data
- Altering the volume of a quote, but keeping the same price is not considered Derived Data, for example the Nasdaq volume is 100 shares but Trading Platform offers 10 shares
- Adding small amounts of decimals that marginally alter a quote is not considered to be Derived Data
- Random calculations that affect the quote marginally are not considered to be Derived Data
- Using a price of a single Equity-, Derivatives- or Commodities- security in real-time that is comprised with prices from other trading venues is not considered to be Derived data

Non-Display usage: When a Trading Platform uses Nasdaq market data for best execution checks, the Non-display Trading Platform License applies. If it is also used for order routing purposes, other applicable Non-display License apply.

DERIVED DATA PRICING CLARIFICATIONS

Service Level/Details	Description
Nasdaq Nordic Equity	<p>Nordic Equity Derived Data is free when provided to current Subscribers of that same level of Nordic Equity Data.</p> <p>The Nordic Equity Derived Data Distribution – New Original Works license gives the distributor the right to utilize Nasdaq Nordic Equity real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Nordic Equity market data.</p>
Nasdaq Baltic Equity & Fixed Income	<p>Baltic derived data is free when provided to current Subscribers of that same level of Baltic Data.</p> <p>The Baltic Derived Data Distribution – New Original Works license gives the distributor the right to utilize Nasdaq Baltic real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Baltic market data.</p>

<p>Nasdaq Nordic Fixed Income</p>	<p>Nordic Fixed Income derived data is free when provided to current Subscribers of that same level of Nordic Fixed Income Data (see Enterprise Licenses for Bond Analytics and Fixings).</p> <p>The Nordic Fixed Income Derived Data Distribution - New Original Works license gives the distributor the right to utilize Nasdaq Nordic Fixed Income data to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Nordic Fixed Income market data.</p>
<p>Nasdaq Nordic Derivatives</p>	<p>Nordic Derivatives derived data is free when provided to current Subscribers of that same level of Nordic Derivatives Data.</p> <p>The Nordic Derivatives Derived Data Distribution - New Original Works license gives the distributor the right to utilize Nasdaq Nordic Derivatives real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Nordic Derivatives market data.</p>
<p>Nasdaq Commodities</p>	<p>Commodities derived data is free when provided to current Subscribers of that same level of Commodities Data.</p> <p>The Commodities Derived Data Distribution - New Original Works license gives the distributor the right to utilize Nasdaq Commodities real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Commodities market data.</p>
<p>LBMA Trade Data</p>	<p>Internal usage of derived LBMA Trade Data is free with a LBMA Trade Data enterprise license. LBMA Trade Data derived data is free when distributed to controlled terminals of LBMA Trade Data, but where used outside a controlled terminal, it requires a separate LBMA Trade Data enterprise license. For all other LBMA Trade Data products derived data is not allowed.</p> <p>LBMA Trade Data average price used in the LBMA Trade Data VIPT offering shall not without prior written consent be used:</p> <ol style="list-style-type: none"> 1. As reference for the issuance of a financial instrument; 2. As reference for the determination of the amount payable under a financial instrument or a financial contract; 3. As reference by a party to a financial contract; 4. For measuring the performance of an investment fund for the purpose of tracking the return of the precious metal markets, of defining the asset allocation of a portfolio, or of computing the performance fees; 5. For any other purpose which may qualify LBMA Trade Data average price used in the LBMA Trade Data VIPT product as a benchmark in accordance with regulation (EU) 2016/1011 of the

	European Parliament and of the European Council on indices used as benchmarks in financial instruments and financial contracts.
Nasdaq ESG Portal Data	ESG Derived Data that is distributed internally or externally is fee-liable as part of the payment of the ESG Derived Data Distribution Fee.
Salmon Index	Derived data is not permitted. Distributors and/or Subscribers shall not use any Nasdaq Salmon index data or Nasdaq Salmon index related Information, in whole or in part, to create an index, custom or otherwise, including creation of a composite index (index of indexes) or financial, commodity, non-financial, or any other instrument unless separately licensed by Nasdaq.

- Derived Data used for Net Asset Value [NAV] calculations for funds listed on Nasdaq Nordic is not fee-liable.
- Distributors are not permitted to use the Nordic Margin Price Data to create a Derived Data product.
- For Nordic Equity, Nordic Fixed Income, Nordic Derivatives, and Commodities, Baltic; Derived Data Fees do not include the right to create indexes. If using the data to create indexes, only the Index fees would apply. If using for both Derived Data and indexes, then both fees would apply.
- Derived Data used for calculations for ETP instruments listed and traded exclusively on Nasdaq Nordic exchanges is not fee-liable.
- Any firm that receives a real-time Data Feed for derived data creation purpose only is at least required to pay the Internal Distributor fee for receipt of a real-time Data Feed.

3. NON-DISPLAY USAGE

OVERVIEW

Non-Display usage is any method of accessing Exchange Information other than Display Usage. Non-Display Usage is a means of accessing Nasdaq data that involves automated access or use by a machine, without access or use of a Display by a natural person or persons.

Devices used in the transportation, dissemination or aggregation (collectively, “distribution”) of data are not necessarily fee-liable, but the Distributor should be able to identify such Devices that exist within the market data infrastructure and how many Devices are used for distribution, separate and apart from Devices that are used for other purposes, as illustrated by the examples below.

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NORDIC & BALTIC NON-DISPLAY

Categories applicable per asset class product:

- Category 1 Non-Display: Covers a firm's non-display trading-based activities as trading firms and for the purpose of customer business facilitation. Includes: order routing, fully automated trading, and trading with manual intervention. (Also includes Category -2 usage outlined below)
- Category 2 Non-Display: Covers non-trading non-display activities for the purpose of calculation and verification such as but not limited to: portfolio valuation, administration, risk calculations, analysis, and fund management.
- Trading Platform: Distributors or Recipients operating a Trading Platform (including but not limited to: Multilateral Trading Facilities (MTF), Organized Trading Facilities (OTF), dark pools, broker crossing networks, systematic internalization systems, alternative trading systems, crossing networks are liable for the Trading Platform fee.

For further information and clarification: [Nordic Equity Non-Display Clarification](#)

NORDIC & BALTIC NON-DISPLAY USE EXCLUSIONS

Non-Display does not include any use of Nasdaq Nordic or Baltic information that merely enables a display, and results in the output of Nasdaq Nordic information solely to a display. Examples include, but are not limited to:

- An application that is updating a portfolio and exposes such information on the display is not considered Non-Display
- Calculating VWAPs or other derived information for use in a Display is not considered Non-Display, however a derived license may apply

NORDIC EQUITY NON-DISPLAY

Nasdaq will review the percentage of data usage related to algorithmic trading to determine if the fee exemption per Nordic Member Rules and other relevant Non-display products will apply or not in January and July every year. This review will be based on June and December Nordic Equity Market share reports

NORDIC AND BALTIC FIXED INCOME NON-DISPLAY

Non-display usage of Nordic Fixings is part of the Nordic Fixings Enterprise License fee and is not liable for the Nordic Fixed Income Non-display fee.

The Nordic Fixings Subscriber fee and the Nordic Fixed Income Subscriber fee do not include non-display usage of Nordic Fixings and are liable for the Nordic Fixed Income Non-display fee. All other Non-display usage of Nordic Fixed Income Data is fee-liable

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regardless of the source of the market data.

NORDIC DERIVATIVES NON-DISPLAY

All Nordic Derivatives Non-display usage is fee liable. The only exception is for Market Makers and Liquidity providers as stated in the Nordic Derivatives Members section under Pricing Clarifications in this document.

COMMODITIES NON-DISPLAY

All commodities Non-display usage is fee-liable, regardless of the source of the market data. The only exception is for Market Makers who have signed a market maker agreement as detailed in the Commodities Members section under Pricing Clarifications in this document

MANAGED DATA SOLUTION (MDS) NON-DISPLAY

A customer subscribing to a Non-Display: Category 1 product directly with Nasdaq and also a Non-display MDS product can be fee exempt for the Non-display product with the lowest price. This does not apply to Non-Display: Category 2 products.

OTHER NON-DISPLAY QUESTIONS

If your firm is unsure about a specific use case, please submit your use case to your Nasdaq Representative for a determination at any time. For avoidance of doubt, Non-Display is fee-liable regardless of whether the Order Management System, Execution Management System, or trading infrastructure is:

- A virtual system or located in the cloud;
- Installed locally within a data center;
- Enterprise; or
- Locally on an individual's desktop or Device.

If your firm utilizes Nasdaq Information in accordance with the Non-Display clarification above, please contact Nasdaq.

4. DELAYED DATA

OVERVIEW

Nasdaq permits Distributors to delay certain Information. Currently, if a data product is eligible for delayed pricing, and the data is delayed as per the Delayed Data Policy, there may not be a charge for the usage of the delayed data, depending upon the product.

For Distributors providing delayed Information to Data Feed Subscribers, Nasdaq requires the Distributor to sign a Global Data Agreement if the delayed data is distributed as part of a commercial service; for the avoidance of doubt, a commercial service is any service whereby the Subscriber pays an external Distributor a fee for a delayed data-feed service or product. This fee may be directly for the data or for the service itself.

Delayed data Subscribers using the data in a Controlled Device, or MDS (and not via a commercial service) do not require pre-approval from Nasdaq and should be reported as a Subscriber to Nasdaq by the delayed data feed Distributor.

For Distributors providing delayed Information, Nasdaq requires that an appropriate delay message be provided to Subscribers, including wall boards, tickers, mobile devices and audio announcements on voice response services. The delay message must prominently appear on all displays containing Delayed Data, such as at or near the top of the page. In the case of a ticker, the delay message should be interspersed with the market data at least every 90 seconds.

Examples of appropriate delayed messages are as follows:

- “Data Delayed 15 minutes”
- “Data Delayed 24 hours”
- “Del-15”, “Data Delayed until Midnight CET”

DELAY INTERVALS

DELAY INTERVAL: a period of time after which Information becomes Delayed Information, as specified by Nasdaq. Please refer to the following page for the Delay Intervals for each data product. Some products are eligible for a Delay Interval, and after such time the data may be fee-liable or free, depending upon the product. Note that Nasdaq does not offer reduced pricing for all products, some products are listed as not eligible for a Delay Interval below, and the Real-Time fees apply.

Data Type	Description
Real-Time Information	<p>Information disseminated prior to the Delay Interval.</p> <p>Uncontrolled Products require prior approval.</p>
Delayed Information	<p>Information disseminated after the Delay Interval. Nasdaq currently recognizes the following</p> <p>Delay Intervals, which apply to individual products:</p> <ul style="list-style-type: none"> • 15 minutes • 24 hours • Midnight Local Time (local time 11:59:59 PM where the information is released) • Not Eligible for Delayed Pricing <p>Note the Midnight Local Time refers to the time zone where the Information is originally distributed from Nasdaq.</p>
End-of-day Information	<p>Information from the current day that is disseminated after the market has closed for the current day and after the Delay Interval (unless otherwise noted).</p>

REAL-TIME DATA	<ul style="list-style-type: none"> • Data Disseminated prior to the Delayed Timeframe for any product • Prior Approval Required for Uncontrolled Products
DELAYED TIMEFRAME: 15 MINUTES	<ul style="list-style-type: none"> • Data Disseminated at least 15 minutes after Nasdaq releases the information • Prior Approval Required for Uncontrolled Products
DELAYED TIME FRAME: MIDNIGHT LOCAL TIME [Time-Zone Specific]	<ul style="list-style-type: none"> • Data Disseminated after midnight local time [11:59:59 PM] where the information is released • No Prior Approval Required for Uncontrolled Products , see Product Specific Notes below for exceptions
DELAY TIMEFRAME: 24 HOURS	<ul style="list-style-type: none"> • Data Disseminated at least 24 hours after Nasdaq releases the information • No Prior Approval Required for Uncontrolled Products , see Product Specific Notes below for exceptions
DELAY TIMEFRAME: END-OF-DAY	<ul style="list-style-type: none"> • Data Disseminated after market close on the day Nasdaq releases the information and after the Delayed Data Timeframe for the associated product • No Prior Approval Required for Uncontrolled Products , see Product Specific Notes below for exceptions

Distributor may systematically delay certain information per the specified Delay Interval after which the distribution of the Information may not be fee-liable and may not need to be reported to Nasdaq on a monthly basis.

SUBSCRIBER AGREEMENT REQUIREMENTS: DELAY DATA / END-OF-DAY DATA

Distributors are currently not required to obtain Nasdaq Global Subscriber Agreements from Recipients of Delayed and/or End-of-Day Information on Controlled Products. Nasdaq's waiver of the Nasdaq Global Subscriber Agreement requirement does not limit the Distributor's indemnification obligations as per the [Nasdaq Global Data Agreement](#).

DATA FEED AGREEMENTS: END-OF-DAY DATA FEEDS

Distributors that provide End-of-Day Information, held until after the Delay Interval, if applicable, on an Uncontrolled Product are not currently required to obtain a Nasdaq Global Data Agreement from such Data feed Recipients. Nasdaq's waiver of the agreement requirements does not limit the Distributor's indemnification obligations as per the agreement.

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PRODUCT SPECIFIC NOTES:

Product	Note
Baltic Equity & Fixed Income	The Midnight (Local Time) Delay Interval applies only to External distribution of Baltic End-of-Day reports received from Nasdaq and distributed in their entirety; partial extracts of such Baltic End-of-Day reports may be distributed prior to midnight Local Time free of charge; Baltic End-of-Day reports may be created by the Distributor from underlying data sets and distributed prior to the corresponding Delay Interval free of charge.
Nordic Fixed Income	The only components of the Nordic Fixed Income product that are eligible for delayed distribution are the intraday pre-& post trade data.

The below table outlines delay times for each respective product. For questions, please contact your Account Manager.

Product	Product Description	Delay Interval
Nordic Equity	Nordic Equity TotalView	Not Eligible
	Nordic Equity Level 1	15 Minutes
	Nordic Equity Level 2	15 Minutes
	Nordic & Baltic Equity Last Sale	15 Minutes
	VINX All	Not Eligible
	Nordic Equity ITCH Glimpse	Not Eligible
Nasdaq Commodities Data	Commodities TotalView	Not Eligible
	Commodities Level 2	15 Minutes
	Commodities ITCH Glimpse	Not Eligible

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	Commodities End-of-Day	Midnight LT
Baltic Data	Baltic Equity & Fixed Income Level 1	15 Minutes
	Baltic Equity & Fixed Income Level 2	15 Minutes
	Baltic Equity & Fixed Income TotalView	Not Eligible
	Baltic Corporate Actions Weekly	Not Eligible
	Baltic End-of-Day Equity & Fixed Income	Midnight LT
	Baltic End-of-Day Fund List	Midnight LT
	Baltic End-of-Day Files	Midnight LT
	Baltic Equity Reference Data	Midnight LT
	Tallinn and Riga Fixed Income News	15 Minutes
Nordic Derivatives	Nordic Derivatives TotalView	Not Eligible
	Nordic Derivatives Level 1 & 2	15 Minutes
	Nordic Derivatives Norwegian (Oslo)	15 Minutes
	Nordic Derivatives ITCH Glimpse	Not Eligible
Nordic Fixed Income		
	Nordic Fixed Income*	15 Minutes
	Nordic Fixings	Midnight LT
	Nordic Fixed Income Bond Analytics	Not Eligible

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Nordic Reference Data	Nordic Reference Data	Not Eligible
	Nordic Historical View	Not Eligible
	Nordic End-of-Day [Equity, Fixed income, Derivatives]	Midnight LT
LBMA Trade Data	LBMA Trade Data - Weekly	Not Eligible
	LBMA Trade Data Daily	Not Eligible
ESG	ESG Data Portal	Not Eligible
	ESG Footprint	Not Eligible
Salmon Index	Salmon Index	24 hours

The only components of the Nordic Fixed Income product that are eligible for delayed distribution are the intraday pre- & post trade data. Please be advised that trade types "OTC-Loan Payment" and "OTC-Primary Transaction" is not transaction data and not included in the delayed interval. For further details please contact DataEurope@nasdaq.com

5. DISTRIBUTOR FEES

Distributors that receive and provide Delayed Nordic and Baltic Information should review the following chart to determine which Distributor license fees will apply.	Internal Subscriber Use		External Subscriber Use		External Data Feed Use
	Delayed	Real-Time	Delayed	Real-Time	Delayed Data Feed
Receipt of Real-Time Data feed [Internal Use]		X			
Receipt of Delayed Data feed [Internal Use]	X				
Self-Delayed [Internal Use]	N/A				
Receipt of Real-Time Data feed [Internal Use] & Delayed Data feed [Internal Use]	X	X			
Receipt of Real-Time Data feed [Internal Use] & Self Delayed [Internal Use]	N/A	X			
Receipt of Real-Time Data feed [Internal Use] & Delayed Data feed [External Use]		X	X		X
Receipt of Real-Time Data feed [Internal Use] & Self Delayed [External Use]		X	X		X
Receipt of Real-Time Data feed [External Use] & Delayed Data feed [Internal Use]	X			Underlying Distributor Fees	
Receipt of Real-Time Data feed [External Use] & Self Delayed [Internal Use]	X			Underlying Distributor Fees	
Receipt of Real-Time Data feed [External Use] & Delayed Data feed [External Use]				Underlying Distributor Fees	X

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Receipt of Real-Time Data feed [External Use] & Self Delayed [External Use]				Underlying Distributor Fees	
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NASDAQ NORDIC, BALTIC & COMMODITIES HISTORICAL DATA

The Subscriber has the right to save Nordic and Baltic Historical Data on their own computer, to process it, and to employ it for internal use only. The Subscriber is not permitted to forward the Nasdaq Market by Level Nordic and Baltic Historical Data with more than five levels of market by price depth pre-trade data and trades to third parties, or to display it on public access media such as the Internet.

The Midnight (Local Time) Delay Interval applies only to External distribution of Baltic End-of-Day reports received from Nasdaq and distributed in their entirety; partial extracts of such Baltic End-of-Day reports may be distributed prior to midnight local time free of charge; Baltic End-of-Day reports may be created by the Distributor from underlying data sets and distributed prior to the corresponding Delay Interval free of charge.

6. NASDAQ EUROPEAN NETTING PROGRAM

OVERVIEW

The European Netting Program [“Program”] is available to Distributors and Recipients who have met the criteria for the Program, and have been formally approved in writing by Nasdaq. The Program allows approved participants to:

- Directly Report all Display Subscribers regardless of the source of the data;
- Adopt a User based Unit of Count for Display usage reporting and subsequent payment of fees to Nasdaq

Participants in the Program shall report to Nasdaq their internal Display usage, for the following products:

Products:
Nordic Equity

Nordic Fixed Income

Nordic Derivatives

Commodities

Baltic Equity & Fixed Income

ACCEPTANCE CRITERIA

The below acceptance criteria must be met and maintained by each participant of the program:

- Executed the [Global Data Agreement](#) or [Global Subscriber Agreement](#)
- Complete the Nasdaq European Netting Request Form (as provided by Nasdaq Data Operations)
- Agree to direct billing by Nasdaq for all Nasdaq products listed above (for which they have access). Billing will apply across the participant's entire organization, including affiliates. Nasdaq will bill for all services on one billing account. If separate billing accounts are requested, participants will be required to pay multiple distributor fees across each billing account.
- Participants must demonstrate adequate internal controls for entitlements and monitoring, and controls for the reporting of all vendor-reported Display Use as well as any internal Display Use.
- Participants must submit the Net Reporting file in the required format starting from the month approved by Nasdaq (and ongoing). Amendments or edits to the Net Reporting file format are prohibited. In cases where participants amend or edit the file format, they will be billed for all Subscribers (e.g. Not the Netted use).

ACCEPTANCE INTO THE PROGRAM

- After meeting the above acceptance criteria, Nasdaq will provide the participant with an approval letter confirming their acceptance into the Program. The start date will always be at the commencement of a calendar quarter (mutually agreed upon) and communicated in the approval letter.
- An approval letter will be issued by Nasdaq to the vendors that provide data to the participant at the time of acceptance into the Program. Participant must notify Nasdaq of any new vendors such that Nasdaq may inform them. In most cases, vendors require Nasdaq to provide 90 days' notice and as such, the effective date for billing will only commence once each vendor reports Participant usage as non-billable.

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PROGRAM PARTICIPANT OBLIGATIONS

- Participants are required to submit the Net Reporting File report to Nasdaq monthly. The report is due the 15th day of the month following the service month. The report will be rejected if it is not submitted in the required format for Net Reporting Files.
- Participants must report the netted number of Subscribers via the Net Reporting File and the Nasdaq Reporting Application (NORA link) by using one Nasdaq billing account number as stated in the file. Nasdaq will issue only one monthly invoice to Participants in this Program. All participants to the Program shall continue to comply with all other terms and conditions as published in the [Nasdaq Data Policies](#)
- The reporting start date is the first day in the service month in which the product or service is capable of being accessed by a Subscriber. Participants will start reporting the number of display Subscribers before the 15th of the month following the service month. Subscribers of a European Netting Recipient that are billed by a Vendor should be excluded from the count of Subscribers reported to Nasdaq via NORA. European Netting Recipients should work with Vendors to move those Subscribers to non-billable codes.
- Participants must maintain payment of all other fees, including the applicable Distributor/License/Admin Fees.
- Participants must keep adequate records to demonstrate that the particular unit should be netted.

BILLABLE AND NON-BILLABLE GUIDELINE FOR EUROPEAN NETTING PROGRAM

- Participants are to report all Billable and Non-Billable Subscribers and associated instances in the European Net Reporting File as Billable Users.
- Systems may be in the Netting Report File, but should be reported as Non-Billable.
- Participants are permitted to include a maximum of 10% of their non-fee liable subscribers as per the Fee Exemptions Policy as Non-Billable on their European Net Reporting File.

VENDOR REPORTING

Vendors for the purposes of this document shall refer to Distributors of Nasdaq Information that have executed a Distribution Agreement with Nasdaq. Vendors are also known as market data Vendors.

- Participants Display usage through a Vendor shall be covered only to the extent Nasdaq has informed the Vendor of this Program (see Acceptance Into The Program).
- Vendor shall then be instructed by participant to report all Subscribers receiving Information that qualifies for the European Netting Program to Nasdaq under a non-billable code.
- Vendor-reported display usage submitted on behalf of the participant must continue to abide by the Nasdaq Requirements, including the submission of both Summary and Detailed usage reporting to Nasdaq on a monthly basis. Vendors that fail to provide Nasdaq the associated reporting for a participant may be reason for Nasdaq to decline the Netting Reporting File.

TERMINATION

- Participants are required to notify Nasdaq in writing at least ninety (90) days prior, with expiry effective at the end of a calendar quarter. Additionally, European Netting participants must notify their vendors to begin billing and reporting them for all European Information. Confirmation of these requirements must be shared in writing to Nasdaq prior to Nasdaq terminating participant from the Program. Nasdaq will bill the applicable Subscriber usage directly to participant until vendor reporting is updated. Nasdaq may terminate this Program if the participant fails to provide a timely Netted Reporting File each month.
- Upon termination of this Program, participants must provide Nasdaq with a comprehensive list of Vendor reported Subscribers that were reported as non-billable on their behalf. Additionally, participants shall provide each such vendor with a written notification indicating the end date of the Program; such notice must also be sent to Nasdaq.

AUDIT

Nasdaq has the right to examine the books and records of the European Netting participants. Adequate record keeping and controls must be in place to participate in this Program. Participants to the Program are liable for any underreported usage, or usage that is not captured during the Recipients netting process.

OTHER NOTES:

NOTE 1: Non-Display usage is not covered under this policy except for the subscriber fee of Commodities MDS Display with Non-Display Access.

NOTE 2: Nordic and Baltic member firms approved for the [Net Reporting Program](#) who have users currently reported as non-fee liable per the Trading Cycle must report these users as Billable in order to net their other users.

7. UNIT OF COUNT TERMINOLOGY

OVERVIEW

Except where specifically detailed otherwise in this policy document, distribution of Nasdaq Information is to be measured, controlled and recorded by using the Interrogation Device or Subscriber as the Unit of Count.

Terminology	Definition	Unit of count
Subscriber also referred to as Interrogation Device, Device, or Access	A device, computer terminal, automated service, or unique user identification and password combination that is not shared and prohibits simultaneous access, and which is capable of accessing Nasdaq Information; "Interrogation Device," "Device" or "Access" have the same meaning as Subscriber. For any device, computer terminal, automated service, or unique user identification and password combination that is shared or allows simultaneous access, Subscriber shall mean the number of such simultaneous accesses	The Number of physical Devices or the Number of Unique User IDs and Password combinations that are not shared by multiple people, and cannot simultaneously log-on with multiple instances or to multiple Devices Distributors are to report the total number of Subscribers with the potential to access the Information, unless the Distributor is able to technically track actual usage for each Subscriber
Per Query	Retrieval by a Subscriber of Nasdaq Information that is updated by an action on the part of the Subscriber; each unrequested or pushed update of price(s) or quote(s) must be recorded (see Pricing clarifications above for additional details)	Any displayed quote requested or pushed
Data Feed	Any uncontrolled transmission of Nasdaq Information in which the Distributor does not control both the entitlements and the display of the Information	The number of Data Feed Subscribers
User	A natural person that receives Exchange Information	Each natural person

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Website	One or more public internet uniform resource locators (URL) with a single commercial brand or identity	Each unique Website with access to Nasdaq Information. Nasdaq reserves the right to determine whether any URL or group of URLs should be regarded as separate Websites for fee purposes
Unique Devices or Per Device	The number of unique Devices accessing a website or mobile application. Distributors restricting access to the Distributor's service may not report on a "per Device" basis; they must select either "per user" or "per query". Access restriction refers to restrictions on content, not simply a user-name and password requirement (please speak with your Nasdaq representative for additional detail)	The number of "Unique Devices" (Reporting methodologies in counting Devices must be approved in advance by Nasdaq)
Display Usage	Any method of accessing Exchange Information that involves the display of such data on a screen or other mechanism designed for access or use by a natural person or persons	
Custody Account	Number of accounts that the Member has that are available for trading or viewing	"Per Custody Account" pricing requires the Distributor to report each Subscriber with an active custody account with the Member
Active Subscriber	Custody Accounts accessed each month by a Subscriber	Distributors are to report snapshot Subscribers that access the Custody Account of the Member's Service within a particular calendar month
Subscriber Firm	The total number of firms with Private Subscribers plus the number of firms with Business Subscribers accessing the Information	The number of Subscriber Firms
Manual Intervention	A command in the trade process executed by a natural person	Term related to Non-Display

8. DEFINITIONS

The following terms are frequently used:

Information or Data	Any data or information that has been collected, validated, processed and/or recorded by Nasdaq and made available for transmission relating to: (i) eligible securities or other financial instruments, markets, products, vehicles, indicators or devices; (ii) activities of the Exchange; or (iii) other information or data from Nasdaq. Information includes, but is not limited to, any element of information used or processed in such a way that Exchange Information or a substitute for such Information can be identified, recalculated or re-engineered from the processed information
Distributor	An entity and its affiliates, as identified in the Nasdaq Global Data Agreement (or any successor agreement), that executes such an Agreement and has access to Exchange Information
Data Feed	Any uncontrolled transmission of Nasdaq Information in which the Distributor does not control both the entitlements and the display of the Information.
Data Feed Subscriber	Shall mean any Recipient outside of Distributor that (i) receives Nasdaq Information from the Distributor and (ii) for which the Distributor cannot substantially control Nasdaq Information for the purpose of reporting usage or qualification
System Description	Shall mean the System Application, and any other description of Distributor's System given to, and approved by, Nasdaq.
External	Distribution of Nasdaq Information outside of the Distributor's entity as defined by the GDA.
Indirect Access	Any method of accessing Exchange Information other than Direct Access.
Non Professional / Private	A natural person for the purpose of managing the Subscriber's own personal investments and not for any business purpose, nor for the purpose of giving any form of advice to any other person. A Private Use Subscriber may not: (a) contract for, receive or use Information for the purpose of Private Use on behalf of any other person or any corporation, partnership, limited liability company, trust, association or other form of entity,

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	<p>(b) contract for, receive or use Information for the purpose of Private Use in any Service that is paid for by another person or any corporation, partnership, limited liability company, trust, association or other form of entity.</p> <p>A Private Use Subscriber shall, notwithstanding the above:</p> <p>(c) be permitted to contract for, receive or use Information on behalf of or paid for by another natural person (person B) provided that (1) its for the purpose of managing person B's own personal investments and not for any business purpose, and (2) person B have filed a power of attorney or equivalent documentation accordingly with Licensee,</p> <p>(d) be permitted to contract for, receive or use Information for Private Use on behalf of and/or paid for by a legal entity or other form of non-natural Person in which the Private Use Subscriber has full (100%) ownership and exercises full (100%) control,</p> <p>(e) Section (c) and (d) may not be combined.</p>
Professional / Business	All other persons who do not meet the definition of Private Subscriber.
Recipient	Any natural person, proprietorship, corporation, partnership, or other entity that has access to Nasdaq Information.
Delayed	A period of time after which Information becomes Delayed Information, as specified by Nasdaq; by default 15 minutes.
End-of-Day	Information which is available for use after official market close.
Pre-trade Data	Order data available before a trade is complete.
Post-trade Data	Trade data available after a specific trade is complete.
Snapshot	Data Fees for per Individual Price Quote query.
Subscriber	General term for receiver of data for internal usage.
Website	One or more public internet uniform resource locator(s) (URL) with a single commercial brand or identity.

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Redistribution	Providing a controlled or uncontrolled product.
Contributor	Parties contributing input data

9. UNIT OF COUNT: SYSTEM CLASSIFICATIONS

OVERVIEW

The Unit of Count may differ, depending upon the information received and the method of distribution. Please use the below guidelines for submitting Units of Count, Reportable Units or similar to Nasdaq. All Units of Count used by a Distributor or a Distributor's Group must be identified in the Nasdaq System Application. Nasdaq recognizes the following types of System Types or Applications.

UNIT OF COUNT: UNCONTROLLED PRODUCTS

An Uncontrolled Product is defined by Nasdaq as any uncontrolled distribution of Nasdaq Information to Subscribers. If the Distributor cannot control both the entitlements and the display of the Information, then the system will be considered an Uncontrolled Product.

NASDAQ CURRENTLY OFFERS THE FOLLOWING UNCONTROLLED PRODUCTS FOR EUROPEAN MARKETS:

- UP1. Data Feed
- UP2. Nordic & Baltic Managed Data Solutions [MDS]

UNIT OF COUNT: CONTROLLED PRODUCTS

A Controlled Product is defined by Nasdaq as any controlled distribution of Nasdaq Information to Subscribers. If the Distributor controls both the entitlements and the display of the Information, then the system will be considered a Controlled Product.

NASDAQ CURRENTLY OFFERS THE FOLLOWING CONTROLLED PRODUCTS:

- CP1. Subscriber [Controlled Device/Access]
- CP2. Hosted Solution: Select Nordic & Baltic Data

THE UNCONTROLLED AND CONTROLLED PRODUCTS ARE DESCRIBED IN THE FOLLOWING SECTIONS

A. UP1. DATA FEED

Data Product	Type Offered
All Nasdaq Information	Display or Non-Display

A Data feed is defined by Nasdaq as any uncontrolled distribution of Nasdaq Information. Any firm receiving a Data feed (Recipient) is recognized as a Distributor by Nasdaq.

All Data Feeds — including internally or externally distributed, real-time or delayed, snapshot or streaming, Direct or Indirect — must be approved by Nasdaq prior to initiation of service. This approval process creates a direct relationship between the Recipient and Nasdaq. This direct relationship is essential to ensuring the correct display of the information, an effective entitlement process and a timely reporting process of the market data usage. After Distributors are granted permission to provide Data feeds, each individual Recipient of a Data feed must be approved as well. If a Distributor provides data to an unapproved Recipient or releases information prior to approval, the Distributor is responsible for paying the Recipient's fees and charges associated with this data during the unauthorized timeframe.

EXCEPTIONS: NORDIC & BALTIC DELAYED DATA FEED: See the Delayed Data section of this document for further details.

B. UP2. NORDIC & BALTIC MANAGED DATA SOLUTIONS [MDS]

Data Product	Type Offered
NORDIC EQUITY	Business: Display or Non-Display Private: Display
NORDIC DERIVATIVES	
NASDAQ COMMODITIES	
BALTIC EQUITY & FIXED INCOME	

OVERVIEW

Distribution of a Nasdaq Nordic real time market data product for Subscriber or Data feed Recipient usage in internal applications, servers, or similar services where the Distributor controls the entitlement.

Distributors offering Managed Data Solutions must:

- Seek approval from Nasdaq that they may offer Managed Data Solutions
- Report Managed Data Solution Recipients using the Online Reporting System for Summary and detailed Usage Reporting
- Report Managed Data Solution Recipients using data in display and/or non-display Devices
- If Non-Display usage is approved fee-waived by Nasdaq for a Managed Data Solution Recipient, this usage should be reported using a non-billable reporting code
- Offer an integrated data solution with secured data transmissions and data usage monitoring capabilities
- Assume the liability for any unauthorized use of Nasdaq Information by Managed Data Solution Recipients

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C. CP1. SUBSCRIBER: CONTROLLED DEVICE/ACCESS/USER

Data Product	Type Offered
All Nasdaq Information	Display

OVERVIEW

A Controlled Device/Access is a type of Controlled Product that contains Nasdaq Information that is offered by a Distributor where the Distributor controls both the entitlements and the display of the Information. Nasdaq allows Distributors to report such Controlled Products to Nasdaq as Subscribers.

D. CP2. HOSTED DISPLAY SOLUTION

Data Product	Type Offered
Nordic Equity Last Sale, Level 1 or Level 2, Real-Time and Delayed	Display Only
Nordic Derivatives Level 2, Delayed	
Commodities Level 2, Delayed	
Nordic Fixed Income, Delayed	

OVERVIEW

A Hosted Display Solution is a product, solution or capability provided by a Distributor in which the Distributor makes Nasdaq Information available to an application branded or co-branded with a third-party brand for use by external Subscribers of the third-party entity or Distributor. The Distributor maintains control of the data, entitlements and display of the product, solution or capability. The Hosted Display Solution may take a number of forms. Examples include, but not limited to:

- “Widget,” such as an iframe or applet, in which the Hosted Display Solution is a part or a subset of a website or platform.
- “White Label,” in which the Distributor hosts or maintains the website or platform on behalf of a third party entity.

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E. UNIT OF COUNT: COUNTING GUIDELINES

SIMULTANEOUS ACCESS

Simultaneous access by Unique User ID is prohibited, unless the Distributor is able to record, track and report the number of users able to simultaneously access Nasdaq Information. (See pricing clarifications for additional details)

CONTENDED ACCESS

Contended access refers to a service in which multiple Subscribers or Devices access information through a limited number of access sessions. The number of contended access sessions may be smaller than the number of Subscribers or Devices with access capability. Please note that Nasdaq does not consider a contended access session to be equivalent to a Subscriber or an Interrogation Device. In contended access situations, the Distributor must base usage reporting on the number of Subscribers, Interrogation Devices, or Users capable of accessing the Information, not the number of potential simultaneous sessions.

10. HOW TO BECOME A DISTRIBUTOR

Nasdaq Form or Agreement		UP1		UP2	CP1	CP2	
Distributor Requirements	Nasdaq Global Data Agreement	X		X	X	X	
	Nasdaq Data Feed Request Form	X		X	X	X	
	Nasdaq System Application	X		X	X	X	
	Detailed Reporting	X		X	X	X	
Recipient Requirements	Nasdaq Global Data Agreement	X					
	Nasdaq Data Feed Request Form	X					
	Nasdaq System Application	X					
	Nasdaq Global Subscriber Agreement (Submitted to Distributor)			X ¹	X	X	
	Detailed Reporting	X					

Distributors must follow the Nasdaq Subscriber Agreement Policy regarding any external Subscriber usage.

Please note that only Distributors are required to collect Subscriber Agreements from External Subscribers. Internal Subscribers are not required to sign a Subscriber Agreement.

11. ADMINISTRATION FEES

OVERVIEW:

The below table outlines the administrative fees for each respective product. For specific pricing, see the price guide. For any questions, please contact your Account Manager.

Product	Product Description	Administrative Fee
Nordic Indexes	Nordic Indexes	Nordic
	Nordic GIW IndexWatch [GIW]	None
	Nordic Index Weights	
	VINX Index Weight	
	VINX All	
	VINX Plus	
Nordic Equity	Nordic EquityTotalView	Nordic
	Nordic Equity Level 1	
	Nordic Equity Level 2	
	Nordic & Baltic Equity Last Sale	
	Nordic Equity - ITCH Reported Trades	
	GCF GlobeNewswire Feed	None
	Nordic Equity OTC	
	Nordic Equity Norwegian (Oslo)	
	Nordic Equity ITCH Glimpse	
Nordic Fixed Income	Nordic Fixed Income	Nordic
	Nordic Fixings	None
Nordic Derivatives	Nordic Derivatives TotalView	Nordic
	Nordic Derivatives Level 1 & 2	
	Nordic Derivatives Norwegian (Oslo)	
	Nordic Derivatives Analytics Data	
	Nordic Derivatives ITCH Glimpse	None
Nasdaq Commodities	Commodities TotalView	Nordic
	Commodities Level 2	
	Commodities ITCH Glimpse	
	Commodities End-of-Day	None
LBMA	LBMA daily	None
	LBMA weekly	
	LBMA historical	
ESG	ESG Portal	None
	ESG Footprint	

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Nordic Reference	Nordic Reference Data	None
	Nordic Historical View	
	Nordic End-of-Day [Equity, Fixed income, Derivatives]	
Salmon Index	Salmon Index	None
Baltic	Baltic Equity & Fixed Income Level 1	None
	Baltic Equity & Fixed Income Level 2	
	Baltic Equity & Fixed Income TotalView	
	Baltic Corporate Actions Weekly	
	Baltic End-of-Day Equity & Fixed Income	
	Baltic End-of-Day Fund List	
	Baltic End-of-Day Files	
	Baltic GIW IndexWatch [GIW]	
	Baltic Index	
	Baltic Equity Reference Data	
	Tallinn and Riga Fixed Income News	

12. DOCUMENT UPDATES

OVERVIEW

Document updates provide insight into changes of data policies. Major policy updates will be identified by a new release # (currently 2.0). Minor technical updates will be identified by version (e.g. X.1).

January 1, 2021: Version 1.1

- Derived policy updated [Notice](https://newsclient.omxgroup.com/cdsPublic/viewDisclosure.action?disclosureId=955106&lang=en): <https://newsclient.omxgroup.com/cdsPublic/viewDisclosure.action?disclosureId=955106&lang=en>
- Clarification on Internal Distributor fee in relation to derived data added to the derived section
- Added Distributor Fee section
- Added new Administration Fee section to the document previously available in standalone document
- New Nordic Fixed Income product replaces Nordic Fixed Income Level 2 & TotalView and references to obsolete products have been removed
- Added exemptions to LBMA Trade Data- and Corporate Actions products are exempted from the requirement to report at least one Subscriber for a product as presented in Nasdaq Reporting Policy document
- Added policy on Managed Data Solution (MDS) Non-display

April 1, 2021: Version 1.2

- Added ESG products to Administration Fee-table
- Added Salmon Index product
- Updated product name for Nordic & Baltic Equity Last Sale products