

PRE-IPO AND HALT ORDER HANDLING UPDATE:

FREQUENTLY ASKED QUESTIONS

Q: Why is Nasdaq removing the functionality to hold orders in a suspended state until the security has resumed trading for halted/IPO Nasdaq-listed securities?

Nasdaq is updating the way it handles orders received prior to the Display Only Period. There will no longer be a port configuration that determines whether an order is accepted during a halted or IPO state. To simply the process for customers, Nasdaq will begin accepting orders for halted or IPO securities in Nasdaq-listed securities at the later of system start-up or SEC registration effectiveness (for IPOs). Orders in Non-Nasdaq listed securities will not be accepted while a stock is halted unless the order is marked with a routing strategy to send the order to the primary listing market (see Routing Strategy Guide).

Q: Why is Nasdaq going to reject orders in halted/IPO securities for non-Nasdaq listed securities instead of accepting them at any time?

To avoid confusion, Nasdaq believes it is best if orders in non-Nasdaq listed securities are not accepted for halted/IPO securities. As noted previously, Nasdaq will accept orders for non-Nasdaq listed securities that are in a halt or IPO state if the order is marked with a routing strategy that sends orders to the primary listing market (see <u>Routing Strategy Guide</u>).

Q: Will Nasdaq continue to accept orders for halted/IPO securities sent using a strategy that allows for orders to be sent to the primary exchange for non-Nasdaq listed securities?

Yes, as previously mentioned, Nasdaq will continue to direct orders in non-Nasdaq listed securities sent with the proper routing strategies to the primary exchange for execution. Any of Nasdaq's DOT strategies will send orders to the primary for NYSE and NYSE MKT securities and the LIST strategy will direct orders to any primary market for handling during these situations. See the Routing Strategy Guide for a full list of routing strategies and descriptions.

Q: Do firms need to have a certain port setting to have my orders in Nasdaq-listed securities accepted immediately?

No, customers do not need any special settings on their ports as all orders will be handled uniformly with this change. Customers who have the current order suspension functionality enabled on their port will have that feature disabled.

Q: What time can a firm start sending orders for a Nasdaq-listed security that is in a halted/IPO state?

Orders will be accepted beginning at 4 a.m. ET.

Q: How will orders marked to participate in the Nasdaq Opening Cross be handled if a security is halted through the regular 9:30 a.m. ET open?

Orders sent over RASH will be held through the open and take part in the Halt Cross used to re-open the security. Orders entered using OUCH will be cancelled back to the customer after the 9:30 a.m. ET opening process and must be reentered if a customer wishes to participate in the Halt Cross.

Q: How will orders sent as on open orders in Nasdaq-listed IPO's be handled?

Orders sent over RASH and OUCH will be held through the open and take part in the IPO cross.