

Reporting Guideline, version 1.0

Members' On Exchange trade and Members'
and Non-Members' OTC trade Reporting

February 8, 2010

1. General information on reporting

1.1 The NASDAQ OMX Nordic Reporting Guidelines

These Reporting Guidelines supplement the NASDAQ OMX Nordic Member Rules ("NMR"). In addition they offer guidance on the reporting of trades outside the Exchanges.¹ NMR regulate in a general manner the members' requirements to report manual trades, i.e. trades that members execute under the NMR but outside the order book in financial instruments admitted to trading on the Exchange ("Manual Trades").

These Reporting Guidelines cover reporting situations for different financial instruments, such as shares, units in unit trusts and other ownership rights that are issued for public trading. The specific use of the different Trade Types is also described accordingly. This document should be regarded as general instructions on how to report Manual Trades.

Please note that this document is intended as practical guidelines on the reporting of the most common transactions and does not purport to be comprehensive. Situations may arise that are not covered by these Reporting Guidelines.

These Reporting Guidelines do not cover the transaction reports to the competent authorities mandated by law in the various jurisdictions for investment firms pursuant to Markets in Financial Instruments Directive ("MiFID").

Surveillance can be contacted if there are any questions relating to trade reporting.

1.2 Trading

A member can choose between trading on exchange or outside the exchange. For trading on exchange the member can either make trades in the order book or outside the order book. In both these cases the trades must be made in accordance with the NMR. Manual Trades are trades, which are made outside the order book as well as reported in accordance with NMR to the exchange. An "OTC Trade" is a trade made outside the order book, which is not executed and reported in accordance with NMR to the exchange. An OTC-trade is not an on exchange trade even if it per se would fulfil the requirements in the NMR. How an investment firm shall execute the client orders is defined by its Best Execution Policy. For making OTC-trades the investment firm needs to have obtained the clients' express consent, in accordance with MiFID art 21.

On exchange trading has to comply with the requirements in the NMR. For trading on exchange the members benefit from our regulatory environment and market surveillance. This means that the Exchange is responsible for the trading environment and ensures that the demands of a fair and orderly execution, as well as requirements on neutrality and non-discriminatory treatment, are being satisfied. Thereby the Exchange upholds efficient trading for all members.

The OTC trades fall to the members' own responsibility and do not need to be made in accordance with the NMR. OTC Trades in shares have to be made public by investment firms (members as well as non-members) in accordance with art. 28 in MiFID, which requires investment firms that, either on own account or on behalf of clients, conclude transactions in shares admitted to trading on a regulated market (RM) outside a regulated market or Multilateral Trading Facility (MTF), to make public the volume and price of those transactions and the time at which they were concluded. This information shall be made public as close to real-time as possible and in any case, no later than 3 minutes from the time of the agreement, on a reasonable commercial basis, and in a manner which is easily accessible to other market participants. NASDAQ OMX Nordic² provides members and non-members with an "OTC Publication Service" which can be used for this purpose.

¹ Depending on the national legislation there are different requirements regarding market transparency for other instruments than shares admitted to trading on a regulated market.

² "NASDAQ OMX Nordic" refers, for the purposes of these Reporting Guidelines, either each individually or all together, to NASDAQ OMX Copenhagen A/S, NASDAQ OMX Helsinki Oy, NASDAQ OMX Stockholm AB and NASDAQ OMX Iceland hf.

On exchange trades and OTC trades

On exchange trades come in two varieties: trades that are the result of automatically matched buy and sell orders in our central order book or Manual Trades. On exchange trades and OTC trades are shown schematically below:

On exchange Trades

Trades that are automatically matched in our order book in accordance with the NMR.

Trades executed off order book, but in accordance with the NMR and reported to us (Manual Trades)

OTC trades

Trades made outside the NMR, or outside the rules of any other RM or MTF

(OTC Trades can be reported/published via the OTC Publication Service)

1.3 Trade Types

The Trade Types set out below should be used when reporting on exchange Manual Trades or OTC trades (using the OTC Publication Service) to NASDAQ OMX Nordic.

1.3.1 Trade Types for On-Exchange Trades (Manual Trades)

One of the following Trade Types shall be used when reporting Manual Trades:

Trade type	Definition
Standard Trade	A Trade concluded on standard market terms in respect of price, time of the trade and with standard delivery and settlement schedule
Derivative Related Transaction	Exercise or expiration of options, forwards or futures contracts that imply an exchange of securities or a trade that relates to a derivatives trade and that forms an unconditional part of a combination together with a derivative trade.
Portfolio Trade	A transaction in more than one security where those securities are grouped and traded as a single lot against a specific reference price.
Volume weighted average price	A Trade, which price is based on a volume weighted average of trades made within pre-defined time period.
Exchange granted trade ³	A Trade pursuant to an individual or general authorisation from the NASDAQ OMX Nordic.
Pre-Opening Trade	A Trade, which is entered into in Pre-Opening on the date of admission to trading of an Instrument. (Only applies to NASDAQ OMX Nordic Exchange Helsinki.)

Standard Trades in shares below the thresholds in table 1 have to be made on or within the volume weighted average spread (VWAS). The VWAS is the reference price which would have been paid if the order had been executed in the central order book (i.e. would have been the average price if the orders had been auto matched). Standard Trades include all trades made on standard terms, also the ones made above the thresholds in table 1, and outside the VWAS, if made on standard terms for the specific volume.

Although principally the Member needs to make the trade on or within the Spread or VWAS, when there is no Spread the Member needs to make the trade to a price that takes into account the market situation at the time of the trade (for example rule 5.9.1 and 5.9.4).

According to NMR, in certain situations Member may want to make such a trade to a price that is outside the VWAS (for example rules 5.9.1, 5.9.3) if there has been a change in the market conditions after the relevant VWAS was determined. Members shall enter into a trade at a price that takes into account the market situation at the time of the trade

In both of the above cases members shall be able to provide reasons for their assessment of the market situation. As such valid ways to take the market situation into account, could be to use the prices on other relevant market(s) or prices that are based on other suitable reference prices. Surveillance

³ The Trade Type "Exchange granted trade" presupposes that the Member has either obtained prior authorisation from NASDAQ OMX Nordic for the specific case and Trade or that NASDAQ OMX Nordic have granted a general authorisation to all Members for a particular kind of Trade. NASDAQ OMX Nordic shall notify general authorisations through an Exchange Notice.

will assess the suitability of such a reference price which could be for example within a percentage of the price in which the trade would have been entered into if the change in the market conditions had not occurred.

Exercise or expiration of options, forwards or futures contracts that imply an exchange of securities may be reported to the Exchanges. If reported the trade type Derivatives Related Transactions shall be used.

Portfolio trade shall be used for when a member executes a basket of securities on behalf of a client and when the transaction is defined as the whole portfolio of trades. A common example of a Portfolio trade is when an index derivative is traded against a basket of cash securities.

Table 1 Block trades thresholds (clause 5.9.1 in NMR)

Class in terms of average daily turnover (ADT)	ADT < €500,000	€500,000 ≤ ADT < €1,000,000	€1,000,000 ≤ ADT < €25,000,000	€25,000,000 ≤ ADT < €50,000,000	ADT ≥ €50,000,000
Minimum size of order qualifying as large in scale compared with normal market size	€50 000	€100 000	€250 000	€400 000	€500 000

The classification for all instruments admitted to trading on NASDAQ OMX Nordic is to be found on www.nasdaqomxtrader.com/.

1.3.2 Trade Types for OTC Trades

The OTC Publication Service only uses a limited set of trade types:

OTC Trade Types	Definition
OTC Standard	A trade concluded on standard market terms in respect of price, time of the trade and with standard delivery and settlement schedule
OTC Non-Standard	A trade determined by factors other than the current market valuation.
SI Standard	Systematic Internalized trades entered on standard terms. Applicable to Members with SI obligations.
SI Non-Standard	Systematic Internalized trades entered on non-standard terms. Applicable to Members with SI obligations.

The relationship between the OTC Trade Types and the on-exchange Trade Types is shown below:

OTC Trade Types		On-Exchange Trade Types
OTC Standard	corresponds to	Standard Trade
OTC Non-Standard		Derivative Related Transaction Portfolio Trade Volume Weighted Average Price Exchange Granted Trade

The need for a separate trade types for non-standard trades is due to the publication requirement in art. 27 Commissions Regulation (EC) No 1287/2006. This stipulates that trades determined by factors other than the current market valuation have to be identified.

1.4 How to report Manual Trades at NASDAQ OMX Nordic

Manual Trades in NASDAQ OMX Nordic Instruments – all transactions have to be sent to the same order books for each instrument that are used for automatic matching of orders.

- Each leg of a trade shall be reported by the parties⁴. A Trade will be concluded if the following information matches:
 1. Buy and Sell (One party reporting a buy trade and one party a sell trade).
 2. Price
 3. Quantity
 4. Order book
 5. Trade date
 6. Settlement date (if submitted)
 7. Contrabroker
 8. Trade type
- Manual Trades will be made public with the same transparency as trades matched in the continuous order book.

⁴ See "FIX for NASDAQ OMX Nordic Trade Reporting" for details.

1.5 How to report OTC Trades at NASDAQ OMX Nordic

The OTC Publication Service is being offered to members as well as to non-members under separate agreement. All users of the OTC Publication Service will need to set up appropriate technical connections with NASDAQ OMX⁵.

OTC Trade reporting at NASDAQ OMX Nordic will follow two models: **Model 1** for OTC Trades in instruments admitted to trading on NASDAQ OMX Nordic and **Model 2** for other instruments.

Model 1 - Reporting OTC trades in NASDAQ OMX Nordic Instruments for publication

OTC trades in NASDAQ OMX Nordic Instruments – all transactions have to be marked as OTC⁶.

- In OTC reporting the instrument is specified either by ISIN, Currency and Market Segment or the corresponding order book id on the regulated market. All OTC trades will be published over an OTC Reporting Service, not over the regulated market.
- The seller reports the trade unless otherwise agreed between the parties. Trades can be reported as internal /cross trades.
- If both parties have an agreement with the Exchange about publishing OTC trades each party can report its own leg, but we recommend that only one party reports such trades. In case only one of the parties has an agreement with the Exchange it must report the trade as internal trade/cross trade to NASDAQ OMX Nordic.
- OTC trades are anonymous; no participant information is displayed or disseminated.

Only one party is required to report a trade. It is possible to report the trade as two matching trade report transactions or as a single cross trade report transaction. Reporting shall be carried out between the participants as described below:

	Member	Non-member	Client
Member	seller or as agreed	member or as agreed	member
Non-member	member or as agreed	seller or as agreed	non-member

Example 1:

Stockholm member AA has made an OTC trade in ERIC B with a non-member BB, who has not an agreement with NASDAQ OMX Nordic. Member AA is a seller of the trade and reports the trade. AA reports the trade as an OTC internal trade (Instrument ERIC B, in market segment STO Equities) using the OTC publication service for NASDAQ OMX Nordic Instruments. Parties could also have agreed that BB reports the trade to an alternative venue for publication.

Example 2:

Stockholm member AA has made an OTC trade in ERIC B with another Stockholm member CC. Members have two options when reporting the trade, either each of them report their own leg or the seller reports the trade as an internal trade.

Example 3:

A member DD in Copenhagen has made an OTC trade in ERIC B with another Copenhagen member EE. The member DD is a seller and reports the trade as an NASDAQ OMX Nordic Instrument (Instrument ERIC B, in market segment STO Equities) by using the OTC publication service for NASDAQ OMX Nordic Instruments. All the NASDAQ OMX Nordic members will be authorized to report OTC trades to all of the NASDAQ OMX Nordic exchanges regardless of which one they are member of.

Model 2 - Reporting OTC trades in non NASDAQ OMX Nordic Instruments for publication

⁵ See "FIX for NASDAQ OMX Nordic Trade Reporting" for details.

⁶ FIX SecurityDesc (107) = O (OTC) or S (Systematic Internalizer) values.

OTC-trades in non-NASDAQ OMX Nordic Instruments – all transactions have to be sent to the OTC Publication Service.

- For non NASDAQ OMX Nordic Instruments the Execution report shall define the Instrument by entering ISIN, Currency, Price Type as well marking it as external.
- OTC trades are anonymous; no participant information is displayed or disseminated.

Only one party is required to report a trade and only one leg of the trade needs to be reported.

Reporting shall be carried out between the participants as described below:

	Members	Non-member	Client
Member	seller or as agreed	member or as agreed	member
Non-member	member or as agreed	seller or as agreed	non-member

Example 1:

Stockholm member AA has made a trade with another Stockholm member DD in a non NASDAQ OMX Nordic instrument. AA is the seller and reports the trade to the OTC Reporting service indicating the Instrument by ISIN and Currency.

1.6 Information to be entered when reporting an OTC Trade

Model 1 - NASDAQ OMX Nordic Instruments

The same trade reporting⁷ functionality is used when reporting these OTC trades as for Manual Trades and therefore the same information about a trade needs to be entered as when the trade is reported on the regulated market.

Model 2 - Non NASDAQ OMX Nordic Instruments

The same trade reporting method is used when reporting an OTC trade in non NASDAQ OMX Nordic instruments. The following information is required:

- Contrabroker: either Member ID or BIC code
- Buyer/Seller
- Amount
- Price
- Price Type
- Currency
- ISIN
- Trade Type
- Time of Agreement

1.7 Time for reporting

Trades that take place during Exchanges’ Trading Hour must be reported as close to real time as possible, however, not later than three minutes from the time of the agreement.

Manual Trades that take place after the market has been closed must be reported in the Pre-Open Session on the following Exchange Day prior to the opening of the Trading Hours on the following day.

Opening hours for reporting to NASDAQ OMX Nordic OTC Publication Service are the same as the opening hours for Manual Trades. See Art. 29 of the Commission Regulation (EC) No. 1287/2006 implementing Directive 2004/39/EC for further details on when the OTC Trades have to be published.

1.8 Price Risk and Order Capacity/Restrictions when reporting Manual Trades

⁷ See “FIX for NASDAQ OMX Nordic Trade Reporting” for details.

Section 5.6.4 of the NMR requires that trades shall be marked as executed on behalf of "own account" (Order Capacity equal to Principal) or "client" (Order Capacity equal to Agent), as well as in some specific cases as "issuer's holding" (Order Restrictions equal to Issuer Holding) or "market making" (Order Restrictions equal to Market Maker). The factor determining whether the member's trade must be marked as effected on behalf of a client or on behalf of own account is whether the member runs a *price risk* when executing the trade. The member runs a price risk:

- If the member trades shares on its own account and does not have a client behind the trade, or
- if the price at which the trade should be delivered is unknown at the time of the trade.

If the member runs a *price risk*, the trade must be marked as effected on behalf of the member's own account and the trade with the client must subsequently be reported separately. This applies often to VWAP trades, trades concluded at the closing price, etc.

The member shall only report an own account trade if the member incurs an actual and real price risk, but not when the price risk may be deemed to be theoretical. The assessment of whether an actual and real price risk is present should be based on the specific situation, including the size of the trade relative to the amount available in the order book, liquidity at the time of the transaction, etc.

If the member does not run a *price risk* the trade must be marked as effected on behalf of a client. The subsequent client report is superfluous and no separate reporting shall be done. This rule ensures that all trades published within the opening hours of the trading system are current trades.

As a general rule, the price reported must be the price at which the member has traded, i.e. the gross price excluding any fee.

The owner category "Riskless principal" shall be used when the member firm enters orders in a principal capacity, but where there is an agreement by which executions of such orders are passed on to a client by back to back transactions, whereas the member firm is not exposed to any price risk. This is also known as Principal Brokerage.

Members shall when trading according to stabilisation rules in Commission Regulation (EC) No. 2273/2003 of 22 December 2003 (implementing directive 2003/6/EC of the European Parliament and of the Council as regards exemptions for buy-back programmes and stabilisation of financial instruments) mark the order with "Stabilisation" (Order Restrictions equal to Issue Price Stabilization).

"Issuer holding" shall be used when the client for which the trading takes place is the issuer of the financial instruments. The most common such situation is when a share repurchase is being conducted on behalf of a listed company.

"Market making" shall be used when trading takes place under a market making agreement with the Exchange, for example a liquidity provider agreement.

1.9 Minimum price requirement for trade reporting on NASDAQ OMX Nordic Exchange Helsinki

The price for on-exchange trade reporting/manual trades can not be under one (1) euro cent on NASDAQ OMX Helsinki.

2. Transactions subject to reporting obligations

The diagram below sets forth examples of various transaction situations and the reporting obligations applicable thereto if those transactions are made as Manual Trades or if the transactions in financial instruments have to be otherwise published on the basis on transparency requirements in MiFID or local legislation.

	Transaction situation	Reporting obligation	Trade type	Order Capacity/ Restrictions	Note
1.	Situations that relate to the financial instrument.				
1.1	Subscription for and sale of equities prior to stock market listing.	Shall not be reported. The equities are not admitted to trading on the Exchange at this time.			
1.2	Subscription for and sale of newly issued equities.	Shall not be reported. It is a transaction on the primary market.			
1.3	Manual Trades in equity rights admitted to trading on a regulated market, warrants and units in unit trusts.	Must be reported.	Depending on the applicable Trade Type		
1.4	Manual Trades in equities in conjunction with the admission to trading on a regulated market where the equity is traded on the Exchange as a "when-issued" equity.	Must be reported.	Standard Trade		Only applicable to NASDAQ OMX Stockholm

	Transaction situation	Reporting obligation	Trade type	Order Capacity/ Restrictions	Note
1.5	Sale of equities in conjunction with IPO on the date of admission to trading of an Instrument.	May be reported.	Pre-opening Trade		Only applicable to NASDAQ OMX Helsinki
1.6	Compulsory redemption of equities, which, at the time, are still admitted to trading on a regulated market, if made as a Manual Trade.	Must be reported.	Standard Trade		
1.7	Conversion of convertible debentures.	Shall not be reported.			
1.8	Conversion of equities into depository receipts or vice versa.	Shall not be reported.			
1.9a	Trades on a RM or an MTF within EEA in respect to financial instruments admitted to trading on NASDAQ OMX Nordic	Shall not be reported.			
1.9b	Trades in instruments admitted to trading on a regulated market within the EEA made outside any RM or MTF within the EEA	Shall not be reported as on-exchange.	OTC Standard		

	Transaction situation	Reporting obligation	Trade type	Order Capacity/ Restrictions	Note
1.9c	Trades on a foreign stock exchange outside the EEA with respect to financial instruments admitted to trading on NASDAQ OMX Nordic.		Standard Trade or OTC Standard		Trades can be made either as Manual Trades or as OTC Trades. ⁸
1.10	Trades on a foreign exchange with respect to depository receipts in respect of a traded equity admitted to trading on NASDAQ OMX Nordic.	Shall not be reported.			
1.11	Trades in equities on a foreign exchange where a depository receipt is admitted to trading on NASDAQ OMX Nordic.	Shall not be reported.			
2.	Situations that relate to the transaction.				
2.1	Trade between companies within the same group.	Must be reported. Entails a transfer of ownership between different legal entities.	Standard Trade	Both the buy and the sell sides must be marked as on behalf of "Client".	

⁸ The publication requirements for OTC Trades in different types of financial instruments are specified in applicable national legislation.

	Transaction situation	Reporting obligation	Trade type	Order Capacity/ Restrictions	Note
2.2	Trades in accordance with terms and conditions of a published take-over bid (cash bids).	Must be reported. If the take-over bid is conditional the trades must be reported when the conditions have been met.	Standard Trade	The buy side of the trades with the other members must be marked on behalf of "Client". The final transfer of shares to the client shall not be reported.	Not applicable to NASDAQ OMX Stockholm
2.3	The member has <i>no</i> price risk: Client sell or buy order is placed in own trading book in order to be subsequently bought or sold, possibly together with a larger unit.	Client order shall not be reported as a trade.		The related Manual Trade between members shall be marked as on behalf of client	
2.4	The member <i>has</i> price risk: Client sell or buy order is placed in own trading book in order to be subsequently bought or sold, possibly together with a larger unit	Client order must be reported as a trade.	Standard Trade	The related Manual Trade between members shall be marked as on behalf of own account	
2.5	Manual Trades in which the price is set at a guaranteed VWAP (Volume-Weighted Average Price).	Must be reported when the client's price becomes known because of the member's price risk.	VWAP.	<p>The related trade between members shall be reported continuously with the indication that the trade is effected on behalf of "Own account".</p> <p>The final trade with the client must be marked on behalf of client on one side and on behalf of own account on the other side.</p>	

	Transaction situation	Reporting obligation	Trade type	Order Capacity/ Restrictions	Note
2.6	Buy and sell orders from clients matched internally at the member (internal Manual Trades).	Must be reported.	Standard Trade	The member reports the trade as a crossed client-client trade, i.e. both the buy and the sell sides are marked as on behalf of "Client".	
2.7	Trades according to a special permit from the Exchange	Must be reported.	Exchange granted trade		
2.8	Exercise or expiration of options, warrants and futures, with delivery where the underlying asset is admitted to trading on NASDAQ OMX Nordic.	May be reported.	Derivative Related Transaction		
2.9	When a member acts as a client to another member.	Shall only be reported by the member executing the trade on behalf of the client (the other member) <i>or</i> Both members must report the trade.	Standard Trade		
2.10	Manual trade with non-standard settlement period.	Must be reported.	Exchange granted trade		Requires to a special permit from the Exchange

3. Transactions that can be subject to deferred publication

For on-exchange trades, NASDAQ OMX Nordic allow waivers from the principle of immediate publication of a reported trade if the trade meets the criteria in table 2 and is a trade where the member takes on risk. A risk trade is a trade that the member executes between a client and the member's own account (i. e. a principal trade), without immediately doing an offsetting trade. If the risk of the trade is partially offset by another trade in the same instrument or a related instrument or if the member possesses the shares already in own account and can match the client order fully or partly, the remaining part must be of the minimum size in table 2 to qualify for deferred publication.

For OTC Trades the waiver in Art. 28 Commission Regulation (EC) No. 1287/2006 implementing Directive 2004/39/EC, which addresses deferred publication, will apply. An OTC trade has to be reported immediately (i.e. within three minutes). If it is a trade in NASDAQ OMX Nordic Instruments and if it is large enough to be allowed for deferred publication, the one who reports the trade selects the delay time and the system will validate this. If the deferral time is not valid, the best allowed deferral time will be used by the system instead of rejecting the transaction. If it is a trade in non NASDAQ OMX Nordic Instruments, and done in model 2, the one who reports the trade selects the delay time himself. No one will validate that it is correct or allowed. The responsibility is totally on the participant who reports the trade.

The minimum trade sizes required to qualify for deferred publications are given in table 2. The relevant thresholds are the ones expressed in the same currency as the order book in the respective instrument, e.g. for shares traded in Euro the Euro thresholds apply.

Table 2

		Class of shares in terms of average daily turnover (ADT)			
		ADT < EUR 100 000	EUR 100 000 ≤ ADT < EUR 1000 000	EUR 1000 000 ≤ ADT < EUR 50 000 000	ADT ≥ EUR 50 000 000
		Minimum qualifying size of transaction for permitted delay			
Permitted delay for publication	60 minutes	EUR 10 000	Greater of 5%of ADT and EUR 25 000	Lower of 10%of ADT and EUR 3 500 000	Lower of 10%of ADT and EUR 7 500 000
	180 minutes	EUR 25 000	Greater of 15% of ADT and EUR 75 000	Lower of 15%of ADT and EUR 5 000 000	Lower of 20 %of ADT and EUR 15 000 000
	Until end of trading day(or roll-over to noon of next trading day if trade undertaken in final two hours of trading day)	EUR 45 000	Greater of 25 % of ADT and EUR 100 000	Lower of 25 %of ADT and EUR 10 000 000	Lower of 30 %of ADT and EUR 30 000 000

		Class of shares in terms of average daily turnover (ADT)			
		ADT < EUR 100 000	EUR 100 000 ≤ ADT < EUR 1000 000	EUR 1000 000 ≤ ADT < EUR 50 000 000	ADT ≥ EUR 50 000 000
		Minimum qualifying size of transaction for permitted delay			
Permitted delay for publication	Until end of trading day next after trade	EUR 60 000	Greater of 50 % of ADT and EUR 100 000	Greater of 50 % of ADT and EUR 1000 000	100 %
	Until end of second trading day next after trade	EUR 80 000	100 %of ADT	100 %of ADT	250 %of ADT
	Until end of third trading day next after trade		250 %of ADT	250 %of ADT	

The four different deferred publication share classes that are used to define what trade sizes that qualify a trade for deferred publication refers to the criteria in table 2.

A trade that is being deferred shall be reported as soon as possible and will be deferred by the Exchange in accordance with the table 2. If no time is set the trade will automatically be deferred as specified in the table.

The classification for all instruments admitted to trading on the NASDAQ OMX Nordic is to be found on www.nasdaqomxnordic.com.

4. Settlement date restrictions

The following settlement date restrictions / validations apply:

Main rule:

- CCP cleared instruments with settlement date T+1 – T+6 are accepted.
- Non CCP cleared instruments with settlement date ≥T+1 are accepted (i.e. T+6 is not the limit).

Detailed rule:

- CCP cleared instruments with settlement date > T+6 are regarded as OTC, and, therefore, must be reported as OTC.
- CCP cleared instruments reported as '*standard*' trades are per definition T+3.
 - If no settlement date is stated in tag 64 for such reportings, INET will calculate settlement as T+3 counting from 'agreement date', and add that date to the file sent to EMCF.
 - If a settlement date is stated in tag 64, INET will validate that the date is T+3 counting from 'agreement date'. If that is not the case, the report will be rejected. Please note that for reported trades that are old (traded sometime in the past), and the settlement date is a day in the past, INET will reject the trade (even if the validation is okay).

- CCP cleared instruments reported as 'exchange granted': validation on settlement date is counted from 'reporting date' (must be in the span T+1 – T+6).
- Non CCP cleared instruments: Any settlement date can be stated, as is the case today, with the exception of settlement date T+0 and dates in the past.
- Non CCP cleared instruments: For 'standard' trades we validate that settlement date is T+3 counting from 'agreement date'.
- OTC trades are not validated in respect of settlement date.

Below, find the rules in schematic form:

	On Exchange		OTC/SI	
	Standard Trade T = date of trade agreement	Non-standard Trade T = date when report is submitted	Standard Trade	Non-Standard Trade
CCP instruments	T+3	$\geq T+1$ $\leq T+6$	No validation	No validation
Non-CCP instruments	T+3	$\geq T+1$	No validation	No validation

Allowed Trade Types By Trade Date:

Trade Date	On-Exchange Trades	OTC/SI Trades
Today	All Trade Types	All Trade Types
Previous day	All Trade Types	All Trade Types
AS-OF (older than one day)	Exchange Granted Trade	All Trade Types

5. Revision history

Date	Revision	Change Description
January 21, 2010	1.0	Version of Guideline that enters into force February 8, 2010