

IT – Nasdaq Nordic and Nasdaq Baltic – Order Record Keeping updates – Technical go-live and Transitional Period advice (80/17)

As previously communicated, under MiFID II Article 25 and RTS 24, a trading venue has to keep a database of all order records, quotes, session changes, and changes to the indicative prices and volumes during auctions. Nasdaq will support short codes on selected order entry fields for the Equity, Equity Derivatives, Commodities and Fixed Income markets to prevent sensitive full text data to be submitted on orders. Mapping of short codes to long codes will be done via Nasdaq Member Portal; either through REST API, SFTP file upload, or manually through the Member Portal GUI. For a summary of the technical solution and a high level time plan for the roll-out please consult the *Nasdaq Order Record Keeping Guide*, available on the Nasdaq INET Nordic Technical Information website under <u>Protocol Specifications</u>. This page also contains updated versions of the API- and CSV specifications.

Technical go-live

The requirements for Order Record Keeping (ORK) come into force on January 3, 2018. However, Nasdaq's solution for ORK will go live already on November 20, 2017. This includes the implementation of new mandatory order fields in INET and Genium INET as well as the roll-out of new Member Portal functionality that will support administration of short code mappings. From this date, the end-of-day reconciliation process is enabled and daily email notifications, detailing the number of missing mappings for each MPID, will be automatically distributed to all portal users with the *Short Code Administrator* role.

The Short Code Administrator user role becomes available in Member Portal Production on November 20 and will allow its users access to all ORK functionalities in the portal. The user is responsible for ensuring that used short codes are mapped to long codes. There will also be a *Short Code Read Only* role. Each Member is responsible for creating and maintaining its own Member Portal accesses. The *Member Administrator* will be able to add user roles to existing accounts or to create new user accounts. Nasdaq encourages all Members to create at least one Short Code Administrator as soon as possible from November 20, and no later than January 3.

Transitional period

During the transitional period between November 20 and January 3, short codes submitted in orders should preferably be mapped to long codes in the Member Portal. However, the long code values can be dummy values or actual identities. Members choose, on their own discretion, if dummy codes are to be used or not. Members who use dummy codes can



switch to actual, correct codes at any time during the transition period, but must have done so by January 3 at the latest.

Before start of business on January 3, Nasdaq will have cleared all stored order data so that no NCA ORK reports can be produced for dates prior to when MiFID II came into force. However, to allow for Members to use real codes already from November 20, the database containing mappings of short codes to long codes will *not* be cleared. Therefore, Members are advised to consult the below recommendations and to carefully plan for their usage of short codes during the transition period.

Using dummy codes

Any used short code value between 4 and 4,294,967,295 will be referenced in the Member Portal and included in the list of unmapped short codes until it has been mapped to a long code. To simplify the administration and the forthcoming migration to actual long codes, Members are advised to use a limited number of short code values (If only *one* value is used for each ORK field and PartyRoleQualifier, there will be no more than six short codes in total) and to register long codes that clearly represent a fake identity, e.g. 'DUMMY'. <u>Most importantly, registered dummy identifiers should be assigned an End Date so that</u> <u>they are not treated as valid from January 3 and onwards.</u> (This will also allow the same short code value to be re-used and mapped towards an actual long code in the future.)

Switching to real codes

Members can start register actual identifiers from November 20, but must do so by January 3 at the latest. Any used short code value between 4 and 4,294,967,295 will be referenced in the Member Portal and included in the list of unmapped short codes until it has been mapped to a long code. Even if real codes are used, Members have no legal obligation to provide correct long codes on T until January 3. Even so, we strongly recommend completing all outstanding mappings each day in order to fine-tune systems and business processes and to facilitate administration by starting with no missing mappings on January 3.

It is possible to use real codes and dummy codes in parallel during the transition period as long as the dummy identifiers have been assigned an End Date of January 2 or earlier.

For further information and feedback concerning this information, please contact

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Best regards,

Nasdaq Nordic and Nasdaq Baltic



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