

Nasdaq Nordic / Baltic

Business Continuity Plan Description

This document is valid for the legal entities:

Nasdaq Stockholm AB
Nasdaq Copenhagen A/S
Nasdaq Helsinki Ltd
Nasdaq Iceland h.f.
Nasdaq Tallinn AS
Nasdaq Riga AS
AB Nasdaq Vilnius
Nasdaq Oslo ASA
Nasdaq Clearing AB

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1 Document Data

1.1 Document Validity

This document is valid for the legal entities:

- Nasdaq Stockholm AB
- Nasdaq Copenhagen A/S
- Nasdaq Helsinki Ltd
- Nasdaq Iceland h.f.
- Nasdaq Tallinn AS
- Nasdaq Riga AS
- AB Nasdaq Vilnius
- Nasdaq Oslo ASA
- Nasdaq Clearing AB

The above listed entities use common trading systems, clearing system and related systems which enable efficient cross-border trading, cross membership, and one source for Nordic and Baltic market data.

In this document, Nasdaq refers to Nasdaq Nordic and Nasdaq Baltic:

Nasdaq Nordic refers to the Nordic exchanges and the clearing house:

- Nasdaq Stockholm AB
- Nasdaq Copenhagen A/S
- Nasdaq Helsinki Ltd
- Nasdaq Iceland h.f.
- Nasdaq Oslo ASA
- Nasdaq Clearing AB

Nasdaq Baltic refers to the Baltic exchanges:

- Nasdaq Tallinn AS
- Nasdaq Riga AS
- AB Nasdaq Vilnius

The document is valid for the following legal entities:

Legal entity	Markets
Nasdaq Stockholm AB	Stockholm Equities (including Oslo equities) Stockholm Derivatives market (including derivatives on Swedish, Danish, Finnish and Norwegian equities and indices) Stockholm Fixed Income
Nasdaq Copenhagen A/S	Copenhagen Equities Copenhagen Fixed Income
Nasdaq Helsinki Ltd	Helsinki Equities Helsinki Fixed Income
Nasdaq Iceland h.f.	Iceland Equities Iceland Fixed Income
Nasdaq Tallinn AS	Tallinn Equities Tallinn Fixed Income

Nasdaq Riga AS	Riga Equities Riga Fixed Income
AB Nasdaq Vilnius	Vilnius Equities Vilnius Fixed Income
Nasdaq Oslo ASA	Commodity Derivatives

Legal entity	Clearing of:
Nasdaq Clearing AB	Stockholm Equity and Index derivatives (including derivatives on Swedish, Danish, Finnish and Norwegian equities and indices) Stockholm Fixed Income derivatives (including derivatives on Swedish, Danish and Norwegian debt securities) Commodity derivatives

This document applies to the operation of the following systems:

System	Markets
<u>INET Nordics</u> Trading system for the Nordic and Baltic equities markets (and the Icelandic fixed income market).	Stockholm Equities (including Oslo equities) Copenhagen Equities Helsinki Equities Iceland Equities Iceland Fixed Income Tallinn Equities Riga Equities Vilnius Equities
<u>Genium INET Trading</u> Trading system for the derivatives, fixed income, and the commodity markets.	Stockholm Derivatives market (including derivatives on Swedish, Danish, Finnish and Norwegian equities and indices) Stockholm Fixed Income Copenhagen Fixed Income Helsinki Fixed Income Tallinn Fixed Income Riga Fixed Income Vilnius Fixed Income Commodity Derivatives
<u>Genium Market Info</u> Market data distribution system, for the market data product Genium Consolidated Feed (GCF). GCF disseminates consolidated real-time data from all Nasdaq Stockholm source systems.	Market data from all above markets

System	Products
<u>Genium INET Clearing</u> Clearing system for the equity, index, fixed income and commodity derivatives.	Stockholm Equity and Indices derivatives (including derivatives on Swedish, Danish, Finnish and Norwegian equities and indices)

	Stockholm Fixed Income derivatives (including derivatives on Swedish, Danish and Norwegian debt securities) Commodity derivatives
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System	Products
<u>Wizer</u> Collateral management for the equity, index, fixed income and commodity derivatives.	Stockholm Equity and Indices derivatives (including derivatives on Swedish, Danish, Finnish and Norwegian equities and indices) Stockholm Fixed Income derivatives (including derivatives on Swedish, Danish and Norwegian debt securities) Commodity derivatives

1.2 Document Objectives

This document describes the routines, organizations and arrangements that apply for maintaining the operation of Nasdaq’s trading, clearing and other relevant systems in the event of an emergency. It explains the Nasdaq organization for managing system disturbances, emergency and crisis situations, how the Business Continuity Plan is applied, and what features the Disaster Recovery sites offers. Furthermore, load testing and fail-over functionality are described. In addition, it describes the testing performed to maintain the arrangements above.

The purpose of the document is to provide information for audits or queries from external organizations.

1.3 Audience

The intended audience for this document is participants, information vendors, and regulatory or supervisory bodies

2 Introduction

It is of utmost importance for Nasdaq to provide solid and robust systems and procedures for the operation of the markets; including trading, clearing and other relevant systems. Any system disturbance or emergency must be addressed and resolved within the shortest time possible.

As a consequence, Nasdaq has made extensive efforts and spent significant resources on dedicated organizations, routines and system solutions to minimize the impact of system disturbances or emergencies.

3 Emergency Management

Nasdaq has a 24/7 organization ready to act in case of incidents or emergencies affecting Nasdaq's systems, facilities and staff. The organization includes Incident Management, Emergency Response and Crisis Management. Business Continuity and Disaster Recovery Plans can be initiated on several levels.

4 Disaster Recovery

The Disaster Recovery Plan (DRP) is part of the Nasdaq Business Continuity Plan (BCP). The aim of the Disaster Recovery Plan is to outline the process and procedures put in place by Nasdaq to ensure recovery and continuation of infrastructure critical to ensure that the business critical functions can be performed. The DRP focuses on the technology that supports business critical functions.

4.1 System Redundancy and Fail-over

Nasdaq's trading and clearing systems are designed to provide redundancy and fail-over functionality. The fail-over solution depends on the type of system and component involved. This is described in the following chapters (see 4.2 - 4.5).

4.2 Primary and Secondary Sites

Nasdaq distributes its production systems on two separate sites with independent infrastructure, including their own power supply in order to ensure protection from power grid blackouts. The primary site is located in the Stockholm area, approx. 30 km from the secondary site. The secondary site acts as a standby site, where systems and processes can be promoted to run as primary. From a connectivity standpoint the sites are equal. Customers are able to connect to either/both the primary or secondary site, thus being able to reduce their risk and lessen the impact of a system disturbance affecting one site. Both locations have a high security level both in terms of physical protection from fire or water etc., as well as any unauthorized access or other external threats.

4.3 System Fail-over Procedures

In the event of a serious system disturbance, making the primary site unable to continue operating, system operation will need to fail-over to the secondary site. The fail-over procedure differs between systems; it is partly manual for INET, Genium INET and Wizer, but automatic for Genium Market Info. Fail-over functionality is divided into fail-over of back-end systems or components thereof, and fail-over of customer connections. Again, the behavior is different depending on which system and which protocols/API that are affected. Below is a concise description of the failover functionality per system and protocol/API.

4.3.1 INET Nordics

The INET Nordic central system components run on the primary site. The central systems on the secondary site are in hot standby mode. The FIX, OUCH and ITCH protocol connectors are active and available on both sites. OUCH and ITCH allow concurrent logons to primary and secondary site, and FIX allows logon to either primary or to secondary port at a time.

4.3.1.1 FIX

The FIX protocol offers one FIX account use of ports on the primary or on the secondary site one at a time. FIX solution is hot-hot, meaning that FIX ports on both sites are on a listening state, and an instant failover with synchronized sequencing between primary and secondary site is available at any time. Failover is a client initiated process, and a logon made toward the secondary port will force a logoff if there is a client connected to the primary port (or vice versa). Customers are advised to use the ports on the primary site for the lowest latency.

In the event of a primary site failure, the FIX ports on the secondary site will not be possible to use until the routing engine is running in primary mode on the secondary site.

4.3.1.2 OUCH

The OUCH protocol offers one OUCH account concurrent use of ports on the primary and secondary site. Both OUCH ports will accept orders and cancel requests, and outbound messages will be sent on each port. Customers are advised to use the ports on the primary site for the lowest latency. In this configuration, a failover will be seamless as the secondary connection is immediately available.

In the event of a primary site failure, the OUCH ports on the secondary site will not be possible to use until the matching engine is running in primary mode on the secondary site.

4.3.1.3 ITCH

The ITCH protocol offers one ITCH account concurrent use of ports on the primary and secondary site. Market data messaging can be received on both ITCH ports. Customers are advised to use the ports on the primary site for the lowest latency. In this configuration, a failover will be seamless as the secondary connection is immediately available.

In the event of a primary site failure, the ITCH ports on the secondary site will not be possible to use until the matching engine is running in primary mode on the secondary site.

4.3.1.4 Co-Location services

Co-location customers have both the primary and the secondary ports located on the primary site. These customers are offered to enhance their Business Continuity plans by purchasing co-location cabinets and power at the secondary (i.e. disaster recovery) site.

In the event of a primary site failure, the FIX, OUCH and ITCH ports on the disaster recovery site will not be possible to use until the routing and/or matching engine are running in primary mode on the disaster recovery site.

4.3.2 Genium INET

The Genium INET central system components run on the primary site. The central systems on the secondary site are in hot standby mode. The OMnet Gateways are active and available on both sites.

4.3.2.1 OMnet

OMnet Gateways offers redundancy in two layers. The customers connect to single IP and port on a load balancer, which distributes the connection to one out of several physical OMnet Gateway behind it.

An individual OMnet Gateway failure will lead to loss of service for the customers connected to it. When the customer reconnects, the load balancer will direct the connection to another OMnet Gateway.

A failure of the connection between the OMnet Gateway and the transaction router that connects to the central system will cause a failover to another transaction router. The failover is automatic.

In the event of a primary site failure, customers will connect to the secondary site.

4.3.2.2 FIX

FIX fail-over is available in two phases, 1) between FIX gateways on the primary site, and 2) if the primary site is unavailable, to the secondary site:

The FIX gateways on the primary site are configured in pairs. Both FIX gateways in a pair are hosting primary connections. The corresponding secondary port is configured on the other FIX gateway. Customers are only able to connect to the primary port. In the event of a FIX gateway failure, the secondary ports will be enabled for connection. The FIX sequence numbers are shared between the FIX gateways, enabling a customer to continue on the secondary connection.

In the event of a primary site failure, the FIX gateways on the secondary site will be enabled for customer connections. Customers would need to connect to their primary port on the secondary site. The FIX gateways are in cold standby, meaning that sequence numbers from the primary site are not known, The FIX sessions are created as new sessions and customers need to reset the sequence numbers to 1. There are no secondary FIX gateways on the secondary site.

4.3.2.3 ITCH

The ITCH protocol offers one ITCH account concurrent use of ports on the primary and secondary site. Market data messaging can be received on both ITCH ports. Customers are advised to use the ports on the primary site for the lowest latency. In this configuration, a failover will be seamless as the secondary connection is immediately available.

In the event of a primary site failure, the ITCH ports on the secondary site will not be possible to use until the matching engine is running in primary mode on the secondary site.

4.3.2.4 Co-Location services

Co-location customers have both the primary and the secondary ports located on the primary site. These customers are offered to enhance their Business Continuity plans by purchasing cabinets and power at the secondary (i.e. disaster recovery) site.

OMnet is available on both sites. In the event of a primary site failure, the FIX and ITCH ports on the disaster recovery site will not be possible to use until the routing and/or matching engine are running in primary mode on the disaster recovery site.

4.3.3 Genium Market Info

Genium Market Info (GMI) offers concurrent connections to receive the Genium Consolidated Feed. The Genium Market Info central system runs as a primary instance on the primary site, with a secondary instance on the secondary site. Data is replicated real time to the secondary instance, making the Genium Consolidated Feed available to customers connecting to either site.

INET, Genium INET and ICS are the main sources of raw market data to Genium Market Info. The services on the Genium Market Info central system are separated per source, enabling backend failover on a per source basis. As an example, INET and ICS could be sources for the Genium Market

Info central system on one site, while Genium INET could have failed over to the other site. Irrespectively, the Genium Market Info system and hence the Genium Consolidated Feed will be available on both sites.

4.3.3.1 TIP

Genium Market Info offers concurrent connections to receive the Genium Consolidated Feed through the TIP protocol.

4.3.4 Wizer

The Wizer system is designed to provide redundancy and fail-over functionality. The WIZER central system components run on the primary site. The central systems on the secondary site are in hot standby mode.

4.4 Testing Site Functionality and Fail-over

As a baseline, the current exchange and clearing systems have undergone thorough fail-over tests as part of the pre-production integration tests.

To exercise procedures and safeguard against possible errors in configuration, full primary site failover tests in the production systems are performed on a yearly basis.

Central system component failover tests are performed as part of the required testing in conjunction with a major software release. Major releases are typically done 1 – 4 times per year..

4.5 Customer Fail-over Testing

Fail-over functionality is available for all protocols/API. As mentioned in 4.2 and 4.3, customers can connect to either or both of the primary and secondary sites. It is important that customers can verify that their applications and their failover arrangements work as expected. To what extent this can be done in the production system depends on the type of system they connect to.

Customers are recommended to implement fail-over capacity in their applications. Certification of application fail-over capacity is offered but it's not a mandatory requirement.

4.5.1 INET Nordics

Full site failover tests in the INET Nordic production systems are performed on a yearly basis. These tests are internal.

Customers are advised to test fail-over procedures in the INET Nordic test system (OTF). System generated fail-over events are performed according to a weekly schedule. For the current fail-over setup please check schedule on the member extranet.

4.5.2 Genium INET

Full site failover tests in the Wizer production system are performed on a yearly basis; participants and the financial market infrastructure are invited to test connectivity.

Customer failover testing can be performed and verified by the customers by dropping the connection to the primary site. If a customer should wish to simulate a fail-over without their own intervention, they can contact Nasdaq business operations for a forced shutdown of the chosen connection.

4.5.3 Genium Market Info

Full site failover tests in the GMI production systems are performed on a yearly basis. These tests are internal.

Genium Market Info offers concurrent connections to receive the Genium Consolidated Feed. Customers are recommended to connect to both sites in order to not lose any data. Fail-over can be tested and verified by customers by shutting down their own primary connections and switch to receiving data from the secondary connection, or in case of only connecting to the primary, reconnect to the secondary site. If a customer should wish to simulate a fail-over without their own intervention, they can contact Nasdaq business operations for a forced shutdown of the chosen connection.

4.5.4 Wizer

Full site failover tests in the Wizer production system are performed on a yearly basis; participants and the financial market infrastructure are invited to test connectivity.

5 Contingency Plan

The Contingency Plan, which is part of the Nasdaq Business Continuity Plan documentation (BCP), describes the objectives and procedures for how to keep business critical functions operating in a contingency mode in the event of an emergency situation. This includes procedures for relocation to the Contingency Office.

The complete Contingency Plan consists of a number of detailed documents and procedures describing:

- All business critical activities
- Business impact analysis
- Internal and external communication plans
- Training and education plans
- Contingency Office test plans

This chapter will summarize these procedures in order to provide a high level understanding of the processes and controls put in place in order to ensure that business critical functions will be available to customers, suppliers and regulators in the event a relocation to the Contingency Office is needed.

5.1 Contingency Office

In case of an emergency situation resulting in evacuation of the Nasdaq offices, the business operation will relocate to the relevant Contingency Offices depending on which unit is affected. The office facilities and equipment is configured for maintaining the business operations with limited staffing. In an emergency situation additional operational personnel can log in and work from their homes or other location via their laptops and VPN connections.

5.2 Mission Critical Activities

A thorough analysis has been performed to identify a number of business critical activities such as, but not limited to; technical support, surveillance and operations; trade support; trading surveillance; clearing, settlement, collateral and risk management. For each activity the maximal acceptable outage time has been decided and deadlines and fixed delivery schedules have been determined.

To ensure that all activities can be performed from the Contingency Office, all relevant business applications have been installed on a number of desktop computers. All activities, hardware and software are tested on a bi-monthly basis (see 5.4)

5.3 Business Impact Analysis

For each business critical activity, potential events or threats (internal and external) that can cause interruption or other failure are identified. In addition to establishing acceptable outage times for each activity, each risk event has a detailed response plan outlining how to recover and uphold the activity.

5.4 Testing of the Contingency Office

In order to ensure that business critical activities can be performed from the Contingency Office, employees handling these activities visit the site and execute critical routines on a rotating basis every 2nd month. Checklist reports are produced after each visit, and any issues such as faulty hardware, software and services are reported.

5.5 Communication Plan

In order to ensure regular updates to both internal and external parties in the event of a disaster, a communication plan has been established. The plan is a framework for internal and external communication and although the contents will vary depending on the situation it normally includes;

- Internal communication plans relating to:
 - Line management
 - Relevant Crisis Management Team
 - Affected staff
 - Internal Support Functions

- External communication plans relating to:
 - Customers (including members, vendors and listed companies)
 - Contractors and suppliers
 - Media
 - Regulating authorities
 - Cooperative ventures
 - Industry specific organizations

5.6 Education and Training of Staff

In order to ensure that staff is fully educated and trained; line managers are responsible for training staff on the BCP procedures. In addition to this the capabilities of staff, systems and processes are verified through the bi-monthly Contingency Office testing and regular training on emergency situations. Line managers are responsible for ensuring that such reviews and training exercises have been conducted. The Business Continuity Plan is revised and approved on a quarterly basis.