

Quarterly report from Market Surveillance

This report includes the period from 1 January to 31 March 2023

Updates from Market Surveillance

The downward moving trend in risk reducing sell volumes from Norwegian market participants continued this quarter. Non-investment firms located in Norway reduced their risk reducing sell volumes with 64 %, compared to the first quarter in 2022. This is 46 % more than the reduction from non-investment firms located elsewhere. The decreased hedging volumes corresponds with statements in the media from Norwegian hydro producers, stating that because of changed taxation they can only hedge approx. 10 % of their expected production at Nasdaq. Market Surveillance is concerned that the reduced sell volumes from Norwegian hydro power producers reduces the informational value in the future reference price, thus creating asymmetrical information between large power producers and small/medium sized producers and consumers. A weakened reference price will have negative social economic effects, through weakened investment signals, increased capital costs for investments and suboptimal water disposals.

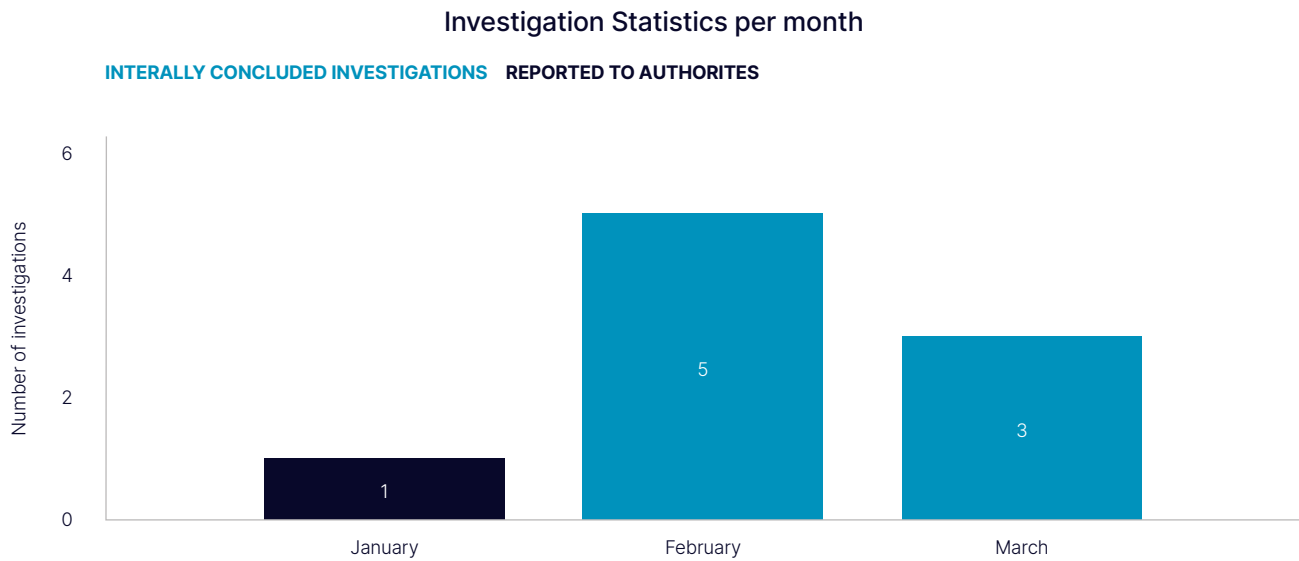
Market surveillance contacted market participants affected by the ION Group incident that occurred in the beginning of February but did not identify that any sensitive trading data related to their activity on Nasdaq Commodities was compromised by the data breach.

Investigation summary

For all incidents and relevant events that Market Surveillance investigate, we look at the incident both in isolation and in a greater perspective. In general, we assess the following components:

- Activity of relevant market participant(s) before and after the incident
- Activity of relevant market participant(s) in other correlated products before and after the incident
- Changes in price formation before and after the incident
- Activity of other market participants
- Market participant(s) position in relevant contracts
- Previous activity and knowledge about market participant(s)

Through analysis, automated alerts and incoming tips Market Surveillance has investigated and reported relevant cases to the relevant authorities, as presented in the figure below:



Selection of concluded investigations

During this period Market Surveillance had no incoming notifications from market participants.

Cases reported to Authorities

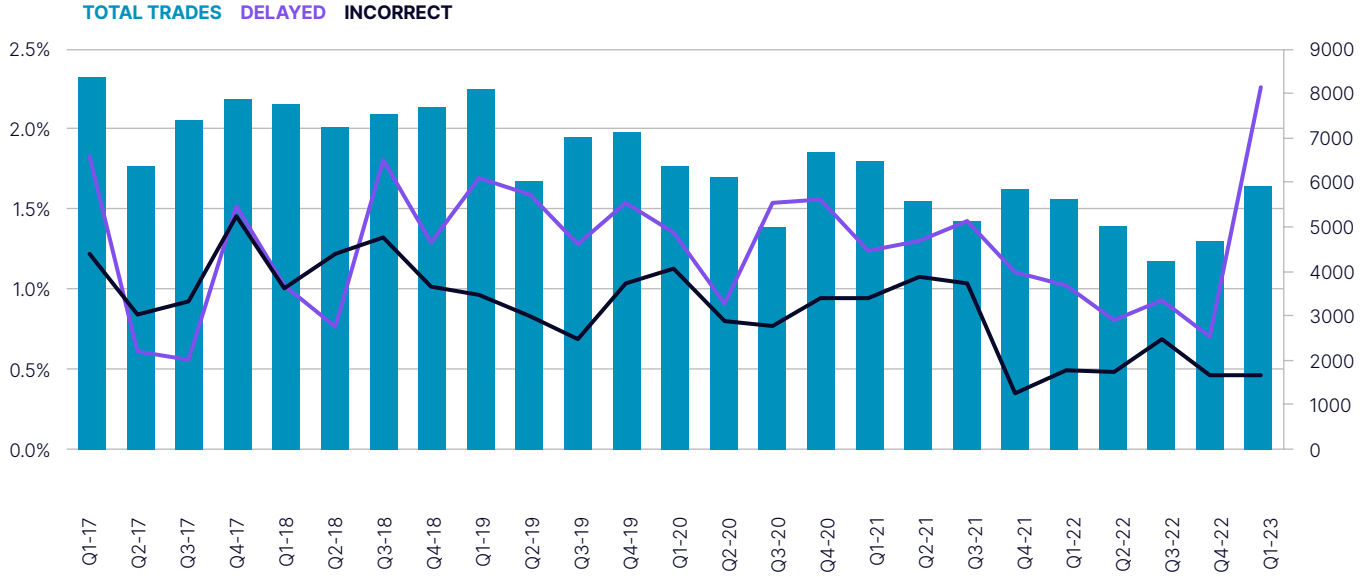
During the first quarter Market Surveillance forwarded one case to the Norwegian NRA regarding incorrect published unavailability at a Norwegian hydro power plant. Market Surveillance found no indications of insider dealing at Nasdaq related to this issue.

Reporting of block trades

The percentage of delays in reporting of block trades was 2.27 % in the first quarter of 2023, this is up from 0.69 % in the fourth quarter of 2023. The increase was driven by several factors, for example technical issues and block brokers waiting for allocation from their customers. Market surveillance will follow the development closely and consider taking necessary steps with the goal to reduce the number of delayed block transactions in the future.

The percentage of erroneous reported block trades was 0.46 % in the first quarter of 2023, this is up from 0.45 % in the fourth quarter of 2023.

Block transactions



*Block Trades with Contract Time within Exchange Opening Hours, or 15 minutes or less before the start of Exchange Opening Hours, reported later than 15 minutes after their Contract Time is defined as delayed.

