

Date(Revision)	2011-09-29
Title	Investment Policy Principles (Appendix 4)
Reference	NASDAQ OMX Default Fund Policy Paper

## INVESTMENT POLICY PRINCIPLES

When a member chooses to provide default fund contributions in the form of cash, NASDAQ OMX will invest the cash in accordance with its Investment Policy. NASDAQ OMX will hold the whole investment risk in the chosen investments. The investment risk vests with NASDAQ OMX and Members' interest on funds provided is not dependent on the performance of the chosen investment by NASDAQ OMX.

NASDAQ OMX investment policy stipulates how NASDAQ OMX is allowed to invest the default fund cash contributions. The investment policy follows the international guidelines (CPSS / IOSCO) regarding how such assets should be invested. NASDAQ OMX will also ensure that any new regulations (EMIR) or changes to current recommendations (CPSS/IOSCO) are reflected and adhered to in its policy. The investment policy is subject to the Swedish FSA's consent.

The investment policy is conservative and NASDAQ OMX's fundamental objective when investing the cash is to minimize the credit, market, concentration and liquidity risk in order to ensure that any funds can be realized with minimum impact on invested value and within a very short time frame. Therefore, the investments will primarily be invested directly in government securities or through collateralized investments (reversed repos) with government securities as collateral. The securities, directly purchased or in the form of collateral, must be highly rated and denominated in the issuer's local currency. Furthermore, counterparties in collateralized investments must fulfill certain rating criteria.

A smaller share of the investments can be held as cash directly in commercial banks or central banks to accommodate for operational requirements.

The cash will be invested in the same currency as the contribution. Exemptions can be made under certain circumstances but any currency risk stemming from such exemptions must be hedged.

The average term of the investments must be less than 12 months in order to limit the market risk.