

Trading Appendix 7 / Clearing Appendix 7

Fee List

Commodity Derivatives

Issued by Nasdaq Oslo ASA and Nasdaq Clearing AB

Effective date: 1 January 2026

FEE LIST

1 GENERAL

The Fee List is valid for Exchange Members and Account Holders only. All applicable fees are listed in this Fee List, the Trading and Clearing Rules and/or on the website of the Exchange and/or Clearinghouse, as applicable.

Annual fees are divided into four equal quarterly payments. The quarterly payments are billed and collected in advance by the Clearinghouse and will be due and payable during the first month of each quarter for the applicable period (Q1: January-March, Q2: April-June, Q3: July-September, and Q4: October-December). New memberships activated mid-quarter will be charged immediately upon approval for a prorated amount covering the remaining days of the current quarter.

No refund is given of quarterly payments in case of termination mid-quarter.

Variable fees are due and will be collected on an ongoing basis as part of the Daily Settlement.

The Clearing Agent is responsible for all fees, including technical access fees and delay fees, that are applicable to its Direct Clearing Clients and the fees are debited the Settlement Account owned by the Clearing Agent or sent as an invoice in the name of the Clearing Agent.

Clearing Members (except Clearing Agents and Clearing Members registering Clearing Transaction on behalf of Clients) and Direct Clearing Clients may nominate themselves as a "Small Clearing Customer", subject to the Clearinghouse's written confirmation, in which case the "Small Clearing Customer" rates shall apply.

Brokers can as NCM members – NCM Broker Member - access the Exchange and are exempted from annual fees as well as variable fees.

Account Holders may change their clearing fee structure only once each quarter following a written notice to the Clearinghouse, and subject to the Clearinghouse's written confirmation. The Clearinghouse will not refund any amount of the annual fee in case of change from a higher to a lower annual fee structure within the same calendar year. In case of changes from a lower to a higher annual fee structure the higher annual fee will be invoiced for the remainder of the applicable calendar year. "Quarters" follow the calendar year.

2 ANNUAL FEES¹

2.1 Exchange fees

2.1.1 All Contract types combined

Membership fee – Exchange Members	EUR 15 000
Membership fee – Block Broker Member	Free of charge
Membership fee – NCM Broker Member	Free of charge
Additional Trading Account (per account)	EUR 6 750

2.1.2 Nordic Power, European Energy, and UK Energy Contracts combined

Membership fee – Exchange Member	EUR 13 500
Membership fee – Block Broker Member	Free of charge
Membership fee – NCM Broker Member	Free of charge
Additional Trading Account (per account)	EUR 6 750

2.1.3 European Energy, UK Energy, and Allowances Contracts individually

Membership fee (per Contract type) – Exchange Members	EUR 1 500
Membership fee – Block Broker Member	Free of charge
Membership fee – NCM Broker Member	Free of charge
Additional Trading Account (per account)	EUR 750

2.2 Clearing fees

2.2.1 Nordic Power, European Energy, and UK Energy Contracts combined

Membership fee - General Clearing Member (GCM)	EUR 25 000
Membership fee - Clearing Member (CM) / Direct Clearing Client (DCC)	EUR 12 500
Additional fee - Clearing Agent (CA) (unlimited DCCs)	EUR 2 500
Small Clearing Customer	EUR 2000

2.2.2 European Energy, and UK Energy individually

Membership fee – all membership categories	Free of charge
Additional fee – Clearing Agent (CA) (unlimited DCCs)	Free of charge

2.2.3 Allowance Contracts

Membership fee – General Clearing Member (GCM)	EUR 3 000
Membership fee – Clearing Member (CM) / Direct Clearing Client (DCC)	EUR 1 500

2.2.4 *Additional account fees – all markets*

Additional Clearing Account / Portfolio (per account) - General Clearing Member (GCM)	Free of charge
Additional Clearing Account / Portfolio (per account) – Clearing Member (CM) / Direct Clearing Client (DCC)	EUR 1 500

3 VARIABLE FEES²

3.1 ETS/MTS Transactions

3.1.1 NORDIC POWER	Futures and DS Futures Contracts	Option Contracts
Trading fee	0.0075 EUR/MWh	0.0075 EUR/MWh, maximum fee per Transaction ³ =10 % of Option Premium
Clearing Fee ⁴		
0-3 TWh cleared in most recent quarter	0.0114 EUR/MWh	
3-8 TWh cleared in most recent quarter	0.0102 EUR/MWh	
8-15 TWh cleared in most recent quarter	0.0088 EUR/MWh	
15-25 TWh cleared in most recent quarter	0.0068 EUR/MWh	
>25 TWh cleared in most recent quarter	0.0056 EUR/MWh	
Option Premium Fee ⁵ : <i>In case of option exercise:</i> Exercise Fee: Contract base Futures		0.5 % <i>maximum fee = 0.0075 EUR/MWh</i> None 50 % discount None
Small Clearing Customer <i>Clearing Fee</i>	0.0202 EUR/MWh	
Option Premium and Option Exercise Fee		None
Clearing of Contract Base in case of Option Exercise		30 % discount
Combined Trading and Clearing Fee	Futures: None	
Futures and DS Futures standard combination orders	DS Futures: None	

3.1.2 EUROPEAN ENERGY		
3.1.2.1 European Power:	Futures Contracts	Option Contracts
Trading Fee German, Electricity	0.0048 EUR/MWh	0.0048 EUR/MWh, maximum fee per Transaction ⁶ =10 % of Option Premium
Clearing Fee German Electricity	0.0045 EUR/MWh	
Option Premium Fee ⁷ : <i>In case of option exercise:</i> Exercise Fee: Contract base Futures		0.5 % <i>maximum fee = 0.0048 EUR/MWh</i> None 50 % discount None

3.1.4 ALLOWANCE CONTRACTS	Day Futures Contracts and Futures Contracts	
Combined Trading and Clearing fee Transfer fee ⁸	0.0030 EUR/ tCO2 None	

3.2 Block Trades and Exchange Future for Swap (EFS) / Exchange Future for Physical (EFP)

3.2.1 NORDIC POWER	Futures Contracts and DS Futures Contracts	Option Contracts
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Combined Trading and Clearing fee Nordic Electricity⁹		
0-3 TWh cleared in most recent quarter	0.0114 EUR/MWh	
3-8 TWh cleared in most recent quarter	0.0102 EUR/MWh	
8-15 TWh cleared in most recent quarter	0.0088 EUR/MWh	
15-25 TWh cleared in most recent quarter	0.0068 EUR/MWh	
>25 TWh cleared in most recent quarter	0.0056 EUR/MWh	
Option Premium Fee ¹⁰ : <i>In case of option exercise:</i> Exercise Fee: Contract base Futures		0.5 % <i>maximum fee = 0.0075 EUR/MWh</i> None 50 % discount None
Small Clearing Customer: Clearing Fee Option Premium and Option Exercise Clearing fee Clearing of Contract Base in case of Option Exercise	0.0202 EUR/MWh	None 30 % Discount
Combined trading and clearing Fee for Futures/DS Futures standard combination orders	Futures: None DS Futures: None	

3.2.2 EUROPEAN ENERGY		
3.2.2.1 European Power	Futures Contracts	
Combined Trading and Clearing fee German Electricity	0.0045 EUR/MWh	
Option Premium Fee ¹¹ : <i>In case of option exercise:</i>		0.5 % <i>maximum fee = 0.0048 EUR/MWh</i>

Exercise Fee: Contract base Futures:		None 50 % discount None
Clearing Registration Fee	Futures	Option Contracts
German Electricity	0.0025 EUR/MWh	None

3.2.4 ALLOWANCE CONTRACTS	Day Futures Contracts and Futures Contracts	
Combined Trading and Clearing fee	0.0030 EUR/ tCO ₂	
Transfer fee ¹²	None	

3.3 Request for Quote Trading System (RFQS)

All applicable markets	Futures and DS Futures Contracts	Options Contracts
RFQ initiated as On Behalf	No trading fee. Applicable clearing fee applies.	No trading fee. Applicable clearing fee applies.
RFQ initiated directly by member	No trading fee. Applicable clearing fee applies.	No trading fee. Applicable clearing fee applies.

3.4 Third Party Exchange Transactions

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3.5 Incentive Programs

Liquidity, Market Maker and other Incentive Programs may be available as announced by the Exchange and/or the Clearinghouse.

3.6 Clearing Portfolio Transfer

Transfers executed by the Clearinghouse

Portfolio transfer from a Direct Clearing Client or
Clearing Member to a General Clearing Member:

Free of charge¹³

External portfolio transfer (between two legal entities)
or internal portfolio transfer (within the same legal
entity):

Hourly fee rate¹⁴

	NOK/SEK	EUR	GBP	USD
Pr. Hour*	1 500	150	120	170

**Minimum fee of NOK/SEK 2 500, EUR 250, GBP 200 and USD 280*

The fee will be debited on the receiving Clearing Account, unless otherwise agreed between the parties¹⁵.

Transfers executed by the member through the Clearing Workstation

External portfolio transfer (between participants):

Clearing fee on both parties

Internal portfolio transfer (within the same participant):

Free of charge¹⁶

4 ETS AND CLEARING PLATFORM MONTHLY FEES¹⁷

All licenses and use of the ETS and/or the Clearing Platform are subject to the ETS User Terms and/or the Clearing System User Terms as applicable.

ETS and Clearing Platform access fees are charged on quarterly basis and debited the Settlement Account.

4.1 Trading License Fees

Unless otherwise specified, price is per user per calendar month¹⁸ and is charged on an incremental basis within its applicable license fee column. For example, the license fees for 3 Users of the same client are calculated as [fee for user 1] + [fee for user 2] + [fee for user 3] (and not as 3 x [fee for user 3]) and so on. Different columns are calculated separately on the same basis.

User	Standard Client ¹⁹ / Third Party Client ²⁰	Trayport ²¹	View only ²²
1	EUR 400	EUR 600	EUR 150
2	EUR 325	EUR 525	EUR 125
3	EUR 275	EUR 475	EUR 110
4	EUR 225	EUR 425	EUR 100
5	EUR 220	EUR 420	EUR 95
6 +	EUR 200	EUR 400	EUR 75

4.2 Preferred Third Party Client program

4.2.1 Trading Technologies

User	TT Next Gen – Standard	TT Next Gen – Pro ²³	View only
1 +	EUR 400	EUR 600	EUR 150 (Free of charge first 90 days)

4.2.3 European Market Data Pricing

Members data usage is not included in the fee described in this section please see separate fee list for European market data pricing here: <http://www.nasdaqomx.com/transactions/marketdata/europeanproducts/european-market-data-pricing>

4.3 TradeGuard Fees

TradeGuard Service	Monthly Fee
Per Pre Trade Limit Group / Account	EUR 20

TradeGuard User fee	Monthly Fee
Admin User 1-3	Free of charge
Admin User 4+	EUR 20
Read only User	Free of charge

4.4 Clearing Application License Fees

Clearing Workstation 1 license fee	Monthly Fee per User
User 1-2	Free of charge
User 3-10	EUR 150 per User
User 11-20	EUR 100 per User
User 21 and above	EUR 50 per User

Q-Port licensee fee	Monthly Fee per User
User 1-2	Free of charge
User 3-10	EUR 160 per User
User 11-20	EUR 110 per User
User 21 and above	EUR 60 per User

4.5 FTP Clearing Report Service

FTP Report dissemination service	Monthly Fee
FTP Account	EUR 50

4.6 Market Data Usage

Members data usage is included in the service fee described in this section when the data is used for “Internal usage” except the service in 4.2. Members using the data in any other way must sign a Nasdaq Global Data Agreement and are fee-liable for the market data usage. Nasdaq Global Data Agreement can be found here:

<http://www.nasdaqtrader.com/content/AdministrationSupport/AgreementsData/globaldataagreement.pdf> “Internal usages” means use within the Member firm by the Member’s authorized Exchange Traders, back office personnel, employees involved in the supervision of the Member’s technical equipment, employees engaged in risk monitoring or analysis of the Member’s trading, and consultants or contractors working as employees or under an outsourcing arrangement (consultant and contractors are regarded as employees). It shall also include usage within the Member’s business related to the following areas:

- Use by registered, certified traders
- Clearing and settlement
- A non-systematic use of information for support of customers in the trading of securities of trading securities
- Risk management of member trade
- Data control and data quality

- Technical Operations and support
- Testing

Other employees of the Member and any employees of affiliates of the Member do not constitute internal users. Usage within the following areas is also excluded:

- Any non-employee usage
- Non-employee order-routing
- Non-employee sponsored access/direct market access
- Any usage sourced from a vendor/distributor Data Feed

From time to time, and no more than once in any twelve (12) month period unless necessary due to suspected non-compliance with the material provisions of the Trading Rules, the Exchange may cause Member's (i) records relating to the information from the Trading System, which has been received via the Member's electronic connection to the Trading System, (ii) log of internal users and (iii) information related to any use of the Trading System by non-Internal Users to be reviewed by the Exchange personnel and/or auditors of the Exchange's choice. Member's liability shall be limited to unpaid fees, together with interest, for the three (3) years preceding the earlier of the date that Member, Member's auditors or Nasdaq first knew or determined that such underreporting, underpayment or other financial noncompliance has occurred. Further information regarding the compliance process can be found here:

<http://www.nasdaqtrader.com/content/AdministrationSupport/Policy/ONSITEREVIEWPOLICY.pdf>

5 ADMINISTRATION FEES

5.1 Delay fee in connection with Cash Optimization

If an Account Holder fails to have sufficient balance for the debit of any payment in accordance with the applicable Payment Report, the Account Holder will be debited a delay fee of $F + S/100\,000 \cdot D$. The delay fee is debited irrespective of whether the Clearing House has suffered any damage. The delay fee is applicable without prejudice to any other measures the Clearing House may take in connection with the late payments.

The fees are accumulated and are debited monthly in each currency to the appropriate Cash Settlement Bank Account.

	DKK / NOK / SEK	EUR	GBP	USD
F= Fixed fee	4 000	400	320	450
S = Settlement amount	Settlement amount divided by one hundred thousand and rounded up to nearest integer.			
D = Number of days delayed	First day delayed is = 1, any overnight deficit adds additional day.			

Any accrued negative interest in relation to the relevant account is applied on the first business day of each month. This may result in a deficit on the account and/or an obligation to settle a larger amount on such day. If, and to the extent that, an Account Holder due to the application of accrued negative interest, fails to have sufficient balance on the relevant account on the first business day of the month, this settlement delay fee will not be applied on such day.

5.2 Delay fee for late Delivery – Allowance Contracts

If an Account Holder fails to timely perform Delivery of Deliverable Instruments in respect of Allowance Contracts pursuant to the instructions of the Clearinghouse and the times specified in the applicable Contract Specification, the Account Holder will be debited a delay fee of $V \times S \times D + F1$. The delay fee is debited irrespective of whether the Clearinghouse has suffered any damage. If the Clearinghouse would fail to timely perform Delivery of Deliverable Instruments the affected Account Holder is credited $V \times S \times D + F2$. The delay fee is applicable without prejudice to any other measures the Clearinghouse may take in connection with the late payment.

The delay fee is calculated per Account Holder per day, and debited / credited to the appropriate Cash Collateral Bank Account

	SEK	EUR
V = Variable fee	100	10
S = Settlement amount	Settlement amount divided by one million and rounded up to nearest integer.	Settlement amount divided by one hundred thousand and rounded up to nearest integer.
D = Number of delayed days	Actual Settlement Date - Original Settlement Date	Actual Settlement Date - Original Settlement Date
F 1= Fixed fee Counterparty	4 000	400
F 1= Fixed fee Clearing House	1 500	150
Buy-in fee	15% of settlement amount	15% of settlement amount

5.3 Individual Client Segregated Account (ICA) Opening fee

A onetime opening fee will be debited when a General Clearing Member or Clearing Member opens a new ICA account.

	NOK/SEK	EURO	GBP	USD
Fee	5 000 per account	500 per account	400 per account	700 per account

If a General Clearing Member or Clearing Member chooses to immediately transfer an existing position into the newly opened ICA account, a position transfer discount will be applied. The discount is a maximum 250 EUR/GBP/USD or 2500DKK/NOK/SEK. Additional costs, such as e.g. additional position transfer costs, will be debited according to the fee list.

5.4 Indirect Clearing Account Opening fee

Opening up to 5 NOSA/GOSA* accounts in total to handle indirect clearing is free of charge.

A onetime opening fee will be debited per each additional account when a Clearing Member opens more than 5 accounts.

	NOK/SEK	EURO	GBP	USD
Fee	5 000 per account	500 per account	400 per account	700 per account

* NOSA - Net Omnibus Segregated Account

GOSA - Gross Omnibus Segregated Account

5.5 Additional Settlement Account fee

If an Account Holder requests settlement account(s), in addition to one in respect of principal flows and one in respect of client flows, a monthly fee will be debited the member for the additional settlement account(s).

	NOK/SEK	EURO	GBP	USD
Fee	300 per account and month	30 per account and month	25 per account and month	40 per account and month

5.6 Fee for insufficient Collateral and/or erroneous instructions in connection with Default Fund

If an Account Holder fails to perform deposits of Collateral to meet its Default Fund contribution on time, in accordance with the Clearing Rules, the Account Holder will be debited a fee of $F + S/100\,000 \cdot D$. The fee is debited irrespective of whether the Clearinghouse has suffered any damage.

If an Account Holder fails to ensure correct confirmation of Collateral transfer pursuant to the instructions of the Clearinghouse, the Account Holder will be debited a fee of $F + S/100\,000 \cdot D$. The fee is applicable for erroneous Collateral instructions on deposits and call back transactions. The fee is debited irrespective of whether the Clearinghouse has suffered any damage.

The fees are applicable without prejudice to any other measures the Clearinghouse may take in connection with erroneous Collateral transactions and late deposits of Collateral.

The fees are accumulated and are debited monthly in each currency to the appropriate Cash Settlement Bank Account.

	DKK / NOK / SEK	EUR	GBP	USD
F= Fixed fee	4 000	400	320	450
S = Settlement amount	Settlement amount divided by one hundred thousand and rounded up to nearest integer.			
D = Number of days delayed	First day delayed is = 1, any overnight deficit adds additional day.			

Any accrued negative interest in relation to the relevant account is applied on the first business day of each month. This may result in a deficit on the account and/or an obligation to settle a larger amount on such day. If, and to the extent that, an Account Holder due to the application of accrued negative interest, fails to deposit sufficient Collateral on the first business day of the month, this collateral delay fee will not be applied on such day.

5.7 Fee for Late Coverage of Intraday Margin Call

If an Account Holder fails to perform deposits of Collateral to meet its Intraday Margin Call requirement on time, in accordance with the Clearing Rules, the Account Holder will be debited a fee of $F + S/100\,000 \cdot D$. The fee is debited irrespective of whether the Clearinghouse has suffered any damage.

If an Account Holder fails to ensure correct confirmation of Collateral transfer pursuant to the instructions of the Clearinghouse, the Account Holder will be debited a fee of $F + S/100\,000 \cdot D$. The fee is debited irrespective of whether the Clearinghouse has suffered any damage.

The fees are applicable without prejudice to any other measures the Clearinghouse may take in connection with erroneous Collateral transactions and late deposits of Collateral.

The fees are accumulated and are debited monthly in each currency to the appropriate Cash Settlement Bank Account.

	DKK / NOK / SEK	EUR	GBP	USD
F= Fixed fee	4 000	400	320	450
S = Settlement amount	Settlement amount divided by one hundred thousand and rounded up to nearest integer.			
D = Number of days delayed	First day delayed is = 1, any overnight deficit adds additional day.			

5.8 Fee for Collateral Management Service (CMS)

The current Fees for Collateral Management Service (CMS) can be found on the Clearinghouse's website.

5.9 Historical Clearing Report Request Fee

If a Clearing Member submits a request in Nasdaq Member Portal for historical clearing reports, and the Clearing House provides the requested reports to the Clearing Member, the Clearing Member will be debited a fee per number of reports requested with a cap of M per request. The fee can be direct debited via daily Cash Optimization cycle via the Clearing Member's settlement account or paid by invoice issued to the Clearing Member.

	DKK / NOK / SEK	EUR
Maximum fee (M)	50 000	5 000
Variable fee per report	500	50

¹ Members Trading only in GBP, NOK, SEK or USD Contracts will be charged in GBP, NOK, SEK or USD applying such reasonable currency conversion rate as the Exchange and/or the Clearinghouse may determine in its discretion.

² Liquidity Provider Programs may be available as announced by the Exchange and/or the Clearinghouse. No variable fees apply to NCM Broker Members.

³ No variable Exchange Trading fee applies to the Contract Base when exercised in accordance with the Clearing Rules. Variable Clearing fees (discounted) will apply to Clearing of the Contract Base upon Option Exercise.

Delta hedge discount: An Exchange Transaction entailing a delta hedge in an Option Contract, i.e. an Option

Contract and its Contract Base in the same Exchange Transaction, has no Trading fee for the Contract Base provided that (i) the Option and delta trades are conducted simultaneously and (ii) MTS is notified before or within ten (10) minutes from Contract Time. The discount is only available when establishing an initial position.

Option strategy discount: Exchange Transactions consisting of two or more Option Contracts with the same Contract Base traded simultaneously receives a fee discount of 50 % of the trading fees that would normally apply to that Exchange Transaction. If the relevant Exchange Transaction also includes a delta trade, the delta hedging discount applies additionally.

⁴ For General Clearing Members (GCMs) and Clearing Members (CMs) registering Clearing Transaction on behalf of Clients, the number of Nordic and German power (not German Monthly DS Futures) TWh cleared in the most recent quarter is aggregated for House Accounts. For Individual Client Segregated Accounts and Clearing Portfolios (excluding Non-Clearing Members accounts) the number of TWh cleared in the most recent quarter is calculated per NCM membership or individually per segregated account/over account belonging to the same legal entity. For General Clearing Members and Clearing Members holding an Omnibus Account with only one Clearing Portfolio associated to it, the highest fee applies.

⁵ Regardless of Option Exercise

⁶ No variable Exchange Trading fee applies to the Contract Base when exercised in accordance with the Clearing Rules. Variable Clearing fees (discounted) will apply to Clearing of the Contract Base upon Option Exercise.

Delta hedge discount: An Exchange Transaction entailing a delta hedge in an Option Contract, i.e. an Option Contract and its Contract Base in the same Exchange Transaction, has no Trading fee for the Contract Base provided that (i) the Option and delta trades are conducted simultaneously and (ii) MTS is notified before or within ten (10) minutes from Contract Time. The discount is only available when establishing an initial position.

Option strategy discount: Exchange Transactions consisting of two or more Option Contracts with the same Contract Base traded simultaneously receives a fee discount of 50 % of the trading fees that would normally apply to that Exchange Transaction. If the relevant Exchange Transaction also includes a delta trade, the delta hedging discount applies additionally.

⁷ Regardless of Option Exercise

⁸ Excludes any fees from the applicable Allowance Registry which may apply to the individual Counterparty.

⁹ For General Clearing Members (GCMs) and Clearing Members (CMs) registering Clearing Transaction on behalf of Clients, the number of Nordic and German power (not German Monthly DS Futures) TWh cleared in the most recent quarter is aggregated for House Accounts. For Individual Client Segregated Accounts and Clearing Portfolios (excluding Non-Clearing Members accounts) the number of TWh cleared in the most recent quarter is calculated per NCM membership or individually per segregated account/over account belonging to the same legal entity. For General Clearing Members and Clearing Members holding an Omnibus Account with only one Clearing Portfolio associated to it, the highest fee applies.

¹⁰ Regardless of Option Exercise

¹² Excludes any fees from the applicable Allowance Registry which may apply to the individual Counterparty.

¹³ When terminating Direct Clearing Client Membership or Clearing Membership

¹⁴ Hourly Fee for internal and external portfolio transfers based on the actual workload of the Clearinghouse

¹⁵ Transfer can be executed in the following ways:

- 1) On trade level on original price (with or without premiums and fees)
- 2) On position level to the daily fix of the transfer day (option not applicable for DS Futures and EPADs)

¹⁶ Please contact clearing@nasdaq.com or +46 8 405 6880 to get a refund.

¹⁷ Members Trading only in GBP, NOK, SEK or USD Contracts will be charged in GBP, NOK, SEK or USD applying such reasonable currency conversion rate as the Exchange and/or the Clearinghouse may determine in its discretion.

¹⁸ Licenses starting or ending within a calendar month will accrue fees for the entire month.

¹⁹ Standard Clients include Trading Workstation and Genium WebTrade. Price is per User ID for use with any one (1) of the available Standard Clients.

²⁰ Access to and use of API is included. Client license (from third party) is not included.

²¹ Access to and use of the “ETS – Trayport” gateway and downstream account are included. Client license (from Trayport) is not included.

²² Access to and use of API is included. Client license is not included. User rights must be restricted to view only.

²³ In addition to the monthly fee TT transaction service fees applies, as per TT's own end user fees.