

## 1. Regulatory background

On 27 March 2024, the European Securities and Markets Authority ("ESMA") published a public statement explaining the changes introduced by Regulation (EU) 2024/791 (the "EU MiFIR Review"). The EU-MiFIR-Review introduced provisions that allow national competent authorities ("NCAs") to grant a new status as "Designated Publishing Entity" ("DPE"), replacing the existing status as Systematic Internaliser ("SI"), which is currently used for the determination of post-trade transparency reporting obligations under MiFIR, among others.

ESMA announced that the changes will come into force from 3 February 2025.

## 2. Status of a Designated Publishing Entity (DPE)

Investment firms can apply to their national supervisory authorities for DPE status in accordance with Article 21a (1) of the Markets in Financial Instruments Regulation (MiFIR). This voluntary status allows transactions to be published via an Approved Publication Arrangement (APA). The national supervisory authority grants DPE status for certain asset classes.

ESMA maintains a public DPE register for the information of market participants.

## 3. NORD/LB as Designated Publishing Entity (DPE)

As of 3 February 2025, NORD/LB will voluntarily become a Designated Publishing Entity for **Bonds and Structured Financial Products (SFPS)**.

For **OTC-EUR-Interest-Rate-Swaps** NORD/LB continues to offer to its clients bilateral reporting agreements.

## 4. NORD/LB takes over all post-trade transparency reporting obligations

Due to its DPE status NORD/LB will always have the obligation for real-time post-trade transparency reporting in transactions on above-mentioned bonds and structured financial products. An exception to this is the case when the client itself acts as the designated publishing entity as well as vendor.

This implies that there is **no need for a contractual arrangement** for post-trade transparency reporting between NORD/LB and its clients on above-mentioned bonds and structured financial products.

Hence, **clients of NORD/LB do not have any reporting obligation** in mentioned transactions.

With regard to the agreement on the responsibility for post-trade transparency publications for OTC-EUR-Interest-Rate-Swaps in accordance with Art. 21 MiFIR, the existing contract continues to apply. NORD/LB will have OTC-EUR-Interest-Rate-Swaps concluded between the parties that are subject to post trade transparency publication published by it through an approved APA, irrespective of the statutory regulation.

## 5. Publication arrangement (APA) of NORD/LB transparency reporting

NORD/LB will use the APA MarketAxess NL B.V. for its transparency reporting:

## 6. LEI of NORD/LB

Legal Name: **Norddeutsche Landesbank - Girozentrale -**

LEI: **DSNHHQ2B9X5N6OUJ1236**

## Contacts at NORD/LB

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Institutional Customers	+49 511 361-9440
Savings Banks & Regional Banks	+49 511 361-9400
MM/FX	+49 511 361-9460

### Corporate Sales

Real Estate/Structured Finance	+49 511 361-8150
Corporate Customers	+49 511 361-4003
FX/MM	+49 511 361-4006

### Markets Trading

Bond Trading	+49 511 361-9640
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